

Final Rule Summary: Updates to School Nutrition Standards

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On April 25, 2024, USDA [released the long-awaited final rule](#) for updates to the school nutrition standards for the National School Lunch Program and School Breakfast Program.

Key takeaways:

- Schools will *not* have to do anything for SY24-25 – everything will remain the same.
- Sodium is far less stringent than the original proposal – there will only be one more reduction.
- Milk and whole grain rules remain the same as now.
- Moving forward states are not required to take fiscal action against districts who are not able to be in compliance due to supply chain disruptions for other issues.

Summary of Provisions:

Sodium: The final rule for sodium is less stringent than the proposed levels we saw in 2023, which proposed 3 separate reductions of sodium. The final rule requires one phased-in reduction of sodium, stopping at Target 2. Schools will have until SY27-28 to be in compliance.

National School Lunch Program Sodium Limits

Age/Grade Group	Current Sodium Limit: In place through June 30, 2027	Sodium Limit: Must be implemented by July 1, 2027
Grades K-5	≤ 1,110 mg	≤ 935 mg
Grades 6-8	≤ 1,225 mg	≤ 1,035 mg
Grades 9-12	≤ 1,280 mg	≤ 1,080 mg

School Breakfast Program Sodium Limits

Age/Grade Group	Current Sodium Limit: In place through June 30, 2027	Sodium Limit: Must be implemented by July 1, 2027
Grades K-5	≤ 540 mg	≤ 485 mg
Grades 6-8	≤ 600 mg	≤ 535 mg
Grades 9-12	≤ 640 mg	≤ 570 mg

The changes to the sodium policy were a significant win for AASA. We advocated for USDA to reevaluate their sodium proposal [in our comments](#) due to its negative impact on palatability of meals. We urged USDA to remain at the current sodium levels, but understanding the pressures to move on sodium proposed this as a compromise. We know the existing limits are already challenging, but we believe this is a more reasonable and achievable path forward. Additionally, USDA has committed to conducting a study on potential associations between sodium reduction and student participation.

Added Sugars: For the first time, USDA is creating limits on added sugar in products served. First, beginning in fall of 2025, the rule limits added sugars in certain products:

- Breakfast cereals may have no more than 6 grams of added sugars per dry ounce.
- Yogurt may have no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce).
- Flavored milk may have no more than 10 grams of added sugars per 8 fluid ounces or, for flavored milk sold as a competitive food for middle and high schools, 15 grams of added sugars per 12 fluid ounces.

In SY27-28, added sugars will be limited as part of the entire meal (the same way sodium is) - no more than 10% of the daily calories.

The proposed rule included a limit to how many days schools could serve “grain-based desserts” (i.e. cereal bars, doughnuts, sweet rolls, toaster pastries, coffee cakes, and fruit turnovers), that was removed from the final rule and will not be implemented.

Milk: Flavored low-fat or nonfat milk can continue to be served, it will just be subject to the new added sugar limits (effective SY25-26). Unflavored milk must still be offered at each school lunch and breakfast meal service.

Administrative Changes:

Buy American: Adds limited exceptions to the Buy American requirements related to product availability and/or cost. Requires schools to maintain documentation to demonstrate the use of exceptions and allows schools to utilize an exceptions list when products are not available in sufficient and reasonably available quantities in the U.S. Schools must also include the Buy American requirements when making purchases and entering into contracts for food used in the school lunch and breakfast programs, beginning July 1, 2024.

The rule also implements a cap on the amount of non-domestic food purchases a school may make when utilizing the exceptions, beginning in school year 2025-2026 (July 1, 2025). USDA will use a phased-in approach to gradually reach the 5 percent cap on non-domestic food purchases:

- 10 percent cap on non-domestic food purchases beginning SY25-26 (July 1, 2025)
- 8 percent cap beginning in SY28-29 (July 1, 2028)
- 5 percent cap beginning in SYS31-32 (July 1, 2031)

For schools that cannot meet the cap, States may provide an accommodation for temporary relief from the requirement. Items that appear on the exceptions list still count toward the cap.

Hiring Standards: Allows State agencies the discretion to approve the hiring of a professional with 10 or more years of school nutrition program experience but who does not hold a postsecondary degree to serve as a school nutrition program director in a medium or large school district. Directors hired under this exception must have a high school diploma or GED. (Current regulation does not require directors for small districts to have postsecondary degrees so they are not impacted by this decision). A “medium” district has an enrollment of between 2,500 to 9,999 students and “large” district has the enrollment of more than 10,000 students.

Meal modifications: Allows registered dietitians to write medical statements to request meal modifications on behalf of a student with disabilities. Previously, regulation only allowed for a State licensed healthcare professional to write the request.

Geographic preference: Allows “locally grown,” “locally raised,” or “locally caught” as procurement specifications for unprocessed or minimally processed food items. State agencies and program operators are able to adopt their own definition of “local”.

Other Meal Planning Changes:

Meat/meat alternatives at breakfast: The final rule establishes a combined grains and meats/meat alternates meal component in the SBP and removes the requirement for schools to offer 1.0 ounce equivalent of grains each day at breakfast. Schools may offer grains, meats/meat alternates, or a combination of both to meet the minimum ounce equivalent in this combined meal component requirement.

This was an additional recommendation from AASA, originally to mitigate the impact of limiting how often grain based desserts could be offered. This change will just provide more options to schools for how to serve breakfast.

Nuts and seeds: Allows nuts and seeds to credit for the full meats/meat alternates component in all child nutrition programs and meals.

Substituting vegetables for fruits in school breakfast: The final rule simplifies the vegetable variety requirement: 1) Schools choosing to offer vegetables at breakfast one day per school week have the option to offer a vegetable from any of the vegetable subgroups. 2) Schools choosing to substitute vegetables for fruits at breakfast on two or more days per school week are required to offer vegetables from at least two different subgroups.

Traditional Indigenous Foods: The final rule specifically states in regulation that tribally operated schools, schools operated by the Bureau of Indian Education, and schools primarily serving American Indian or Alaska Native children, vegetables may be served to meet the grain requirement. “Primarily serve” means that American Indian or Alaska Native children represent the largest demographic group of enrolled children. Individual schools can qualify for this if overall districts do not.

Additionally, the final rule explicitly states that traditional Indigenous foods, in accordance with current meal pattern requirements, may be served in reimbursable school meals. The definition of traditional foods as “food that has traditionally been prepared and consumed by an [American] Indian tribe.” This existing definition includes wild game meat, fish, seafood, marine animals, plants, and berries.

Smart Snacks: Adds “bean dip” to the list of exempted snacks from the total fat standard for Smart Snacks. The change was made in reference to hummus but is using a broader term to compass other possible products that are nutrient dense.

Additional Resources:

- [Comparison Chart](#): 2023 Proposed Standards v. 2024 Final Standards
- [Implementation Timeline](#)
- Video: [Rule Overview](#) , Video: [Added Sugars](#)