

# Comparison of Meal Pattern Requirements for the Milk Component in School Nutrition Programs

The U.S. Department of Agriculture (USDA) has different requirements for the milk component in the meal patterns for grades K-12 and preschoolers (ages 1-4) in the National School Lunch Program (NSLP), School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, Afterschool Snack Program (ASP) of the NSLP, and Special Milk Program (SMP). The requirements for milk are defined by the USDA regulations for the NSLP (7 CFR Part 210), SBP (7 CFR Part 220), and SMP (7 CFR Part 215); and the USDA's final rule, *Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements*. In addition to the USDA meal pattern requirements, milk and nondairy milk substitutes sold to students in public schools (as part of and separately from school meals) must also comply with the state beverage requirements of [Section 10-221q](#) of the Connecticut General Statutes (C.G.S.).

This document summarizes the federal and state milk requirements for each school nutrition program and provides applicable resources. School food authorities (SFAs) must ensure that milk meets the specific requirements for each school nutrition program and grade group. For additional guidance, review the Connecticut State Department of Education's (CSDE) [Operational Memorandum 06-19: Summary of Federal and State Milk Requirements for the National School Lunch Program \(NSLP\), School Breakfast Program \(SBP\), Afterschool Snack Program \(ASP\) of the NSLP, and Special Milk Program \(SMP\)](#).

For information on complying with the meal patterns for school nutrition programs, review the CSDE's guides, [Menu Planning Guide for School Meals for Grades K-12](#), [Menu Planning Guide for Preschoolers in the National School Lunch Program \(NSLP\)](#), [School Breakfast Program \(SBP\)](#), and [Afterschool Snack Program \(ASP\)](#), and [Afterschool Snack Program Handbook](#). For information on crediting foods, visit the CSDE's [Crediting Foods in School Nutrition Programs](#) and [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpages.



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USDA Requirements for the Milk Component in the Meal Patterns for the NSLP, SBP, ASP, SSO, and SMP				
Requirement	Grades K-12		Preschoolers (Ages 1-4)	
	NSLP, SBP, and SSO	ASP and SMP	NSLP, SBP, and SSO	ASP and SMP
<b>Fat content</b>	Must be low-fat or fat-free milk	Same	<b>Age 1:</b> Must be whole milk <b>Ages 2-4:</b> Must be low-fat milk or fat-free milk	Same
<b>Flavored milk</b>	Allowed if milk is low-fat or fat-free  <b>Resources</b> USDA final rule: Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements ( <a href="#">83 FR 63775</a> )	Same	Not allowed unless SFA serves the K-5 meal pattern to preschoolers (see below).  <b>Flavored milk for preschoolers and grades K-5 eating meals together:</b> SFAs that serve NSLP, SBP, and SSO meals to preschoolers and grades K-5 eating together in the same service area at the same time may choose to serve the K-5 meal pattern to both grade groups. The K-5 meal pattern requires a variety of milk choices, which could include flavored low-fat or fat-free milk (see “Varity of milk” on page 3). However, the USDA strongly encourages SFAs to find ways to serve grade-appropriate meals to preschoolers and grades K-5 to best address their nutritional needs.  The USDA allows the option to serve the K-5 meal pattern to preschoolers <b>only</b> when preschoolers are co-mingled with K-5 students during the meal service. SFAs must follow the preschool meal patterns when meals are served to preschoolers in a different area or at a different time than K-5 students.  <b>Resources</b> <a href="#">USDA Memo SP 37-2017</a> : Flexibility for Co-Mingled Preschool Meals: Questions and Answers	Not allowed for SMP.  Not allowed for ASP unless SFA serves the ASP K-12 meal pattern to preschoolers (see below).  <b>Flavored milk for preschoolers and grades K-12 eating snack together:</b> SFAs that serve ASP snacks to preschoolers and grades K-12 in the same service area at the same time may choose to serve the K-12 meal pattern to both grade groups. The ASP meal pattern for grades K-12 allows flavored low-fat or fat-free milk. However, the USDA strongly encourages SFAs to find ways to serve grade-appropriate meals to preschoolers and grades K-12 to best address their nutritional needs.  The USDA allows the option to serve the K-12 ASP meal pattern to preschoolers only when preschoolers are co-mingled with K-12 students during the snack service. SFAs must follow the preschool ASP meal pattern when snacks are served to preschoolers in a different area or at a different time than K-12 students.  <b>Resources</b> <a href="#">USDA Memo SP 37-2017</a> : Flexibility for Co-Mingled Preschool Meals: Questions and Answers

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Requirement	Grades K-12		Preschoolers (Ages 1-4)	
	NSLP, SBP, and SSO	ASP and SMP	NSLP, SBP, and SSO	ASP and SMP
<b>Allowable types of milk</b>	<ul style="list-style-type: none"> <li>Low-fat milk (unflavored or flavored)</li> <li>Fat-free milk (unflavored or flavored)</li> </ul> <p><b>Additional state requirements for milk in public schools:</b> In addition to the USDA meal pattern requirements, all milk sold in public schools (as part of and separately from school meals) must comply with the state beverage requirements of <a href="#">C.G.S. Section 10-221q</a>. Milk cannot contain more than 4 grams of sugars per fluid ounce. Products that comply with the federal and state milk requirements are listed on the CSDE’s <a href="#">List of Acceptable Foods and Beverages</a> webpage.</p> <p><b>Resources</b>  <a href="#">Beverage Requirements</a> (CSDE webpage)  <a href="#">List of Acceptable Foods and Beverages</a> (CSDE webpage)</p>	Same	<p><b>Age 1:</b> Must be unflavored whole milk.  <b>Ages 2-4:</b> Must be unflavored low-fat milk or unflavored fat-free milk.</p> <p><b>Note:</b> Breastmilk meets the milk component and may be served in place of fluid milk. A written request is not required.</p> <p><b>Additional state requirements for milk in public schools:</b> In addition to the USDA meal pattern requirements, all milk sold in public schools (as part of and separately from school meals) must comply with the state beverage requirements of <a href="#">C.G.S. Section 10-221q</a>. Milk cannot contain more than 4 grams of sugars per fluid ounce. Products that comply with the federal and state milk requirements are listed on the CSDE’s <a href="#">List of Acceptable Foods and Beverages</a> webpage.</p> <p><b>Resources</b>  <a href="#">Beverage Requirements</a> (CSDE webpage)  <a href="#">List of Acceptable Foods and Beverages</a> (CSDE webpage)  <a href="#">Serving Milk in the CACFP</a> (USDA)</p>	Same

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Requirement	Grades K-12		Preschoolers (Ages 1-4)	
	NSLP, SBP, and SSO	ASP and SMP	NSLP, SBP, and SSO	ASP and SMP
<b>Variety of milk</b>	Required: SFAs must serve at least two different choices of milk. SFAs that choose to offer flavored milk (fat-free or low-fat) must also offer unflavored milk (fat-free or low-fat) at the same meal service.	Not required: SFAs may serve one type of allowable milk (such as unflavored low-fat milk) to all grades.	Not required: SFAs may serve one type of allowable milk to each age group. For example, unflavored whole milk for age 1, unflavored low-fat milk for ages 2-5, and unflavored low-fat milk for ages 6 and older.	Same

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	NSLP, SBP, and SSO	ASP and SMP	NSLP, SBP, and SSO	ASP and SMP
<p><b>Nondairy milk substitutes for children without a disability</b></p>	<p>For children whose dietary needs do not constitute a disability, SFAs may choose to serve nondairy beverages that meet the USDA’s nutrition standards for fluid milk substitutes in place of milk. Parents or guardians must submit a written request for a nondairy milk substitute for their child. The nutrition standards for fluid milk substitutes are defined by the NLSP regulations (<a href="#">7 CFR 210.10</a>).</p> <p><b>Note:</b> For children whose dietary needs do not constitute a disability, SFAs cannot offer any other beverages (including water and juice) in place of milk for reimbursable meals.</p> <p><b>Additional state requirements for nondairy milk substitutes in public schools:</b> In addition to the USDA meal pattern requirements, all nondairy milk substitutes served in public schools must comply with the state beverage requirements of C.G.S. <a href="#">Section 10-221q</a>. Nondairy milk substitutes cannot contain artificial sweeteners; and cannot contain more than 4 grams of sugar per ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fats. Products that comply with the federal and state requirements for nondairy milk substitutes are listed on the CSDE’s <a href="#">List of Acceptable Foods and Beverages</a> webpage.</p>	<p>Same</p>	<p>For children whose dietary needs do not constitute a disability, SFAs may choose to serve nondairy beverages that meet the USDA’s nutrition standards for fluid milk substitutes in place of milk. Parents or guardians must submit a written request for a nondairy milk substitute for their child. The nutrition standards for fluid milk substitutes are defined by the NLSP regulations (<a href="#">7 CFR 210.10</a>).</p> <p><b>Note:</b> For children whose dietary needs do not constitute a disability, SFAs cannot offer any other beverages (including water and juice) in place of milk for reimbursable meals.</p> <p><b>Additional state requirements for nondairy milk substitutes in public schools:</b> In addition to the USDA meal pattern requirements, all nondairy milk substitutes served in public schools must comply with the state beverage requirements of C.G.S. <a href="#">Section 10-221q</a>. Nondairy milk substitutes cannot contain artificial sweeteners; and cannot contain more than 4 grams of sugar per ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fats. Products that comply with the federal and state requirements for nondairy milk substitutes are listed on the CSDE’s <a href="#">List of Acceptable Foods and Beverages</a> webpage.</p>	<p>Same</p>

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	NSLP, SBP, and SSO	ASP and SMP	NSLP, SBP, and SSO	ASP and SMP
<b>Nondairy milk substitutes for children without a disability,</b> <i>continued</i>	<b>Resources</b> <a href="#">Accommodating Special Diets in School Nutrition Programs (CSDE)</a> <a href="#">Allowable Milk Substitutes for Children without Disabilities in the USDA School Nutrition Programs (CSDE)</a> <a href="#">Beverage Requirements (CSDE webpage)</a> <a href="#">List of Acceptable Foods and Beverages (CSDE webpage)</a> <a href="#">USDA Memo SP 07-2010 CACFP 04-2010 SFSP 05-2010: Questions and Answers: Fluid Milk Substitutions</a>		<b>Resources</b> <a href="#">Accommodating Special Diets in School Nutrition Programs (CSDE)</a> <a href="#">Allowable Milk Substitutes for Children without Disabilities in the USDA School Nutrition Programs (CSDE)</a> <a href="#">Beverage Requirements (CSDE webpage)</a> <a href="#">List of Acceptable Foods and Beverages (CSDE webpage)</a> <a href="#">USDA Memo SP 07-2010 CACFP 04-2010 SFSP 05-2010: Questions and Answers: Fluid Milk Substitutions</a>	

## Regulations and Policy

Code of Federal Regulations (CFR) for the National School Lunch Program (7 CFR 210):  
<https://www.ecfr.gov/cgi-bin/text-idx?SID=4c211a738d6109939c6054a6286ac109&mc=true&node=pt7.4.210&rgn=div5>

Code of Federal Regulations for the School Breakfast Program (7 CFR 220):  
<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=1efda750af767569cda912c147528a21&ty=HTML&h=L&mc=true&r=PART&n=pt7.4.220>

Code of Federal Regulations for the Special Milk Program (7 CFR 215):  
<https://www.ecfr.gov/cgi-bin/retrieveECFR?gp=1&SID=1efda750af767569cda912c147528a21&ty=HTML&h=L&mc=true&r=PART&n=pt7.4.215>

Final Rule Corrections: Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (81 FR 75671): <https://www.fns.usda.gov/es/cacfp/fr-110116>

Final Rule: Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (81 FR 24348):  
<https://www.gpo.gov/fdsys/pkg/FR-2016-04-25/pdf/2016-09412.pdf>

Final Rule: Child Nutrition Programs: Flexibilities for Milk, Whole Grains, and Sodium Requirements (83 FR 63775):  
<https://www.fns.usda.gov/school-meals/fr-121218>

Nutrition Standards in the National School Lunch and School Breakfast Programs (77 FR 4088):  
<https://www.gpo.gov/fdsys/pkg/FR-2012-01-26/pdf/2012-1010.pdf>

School Meals Legislation and Regulations (USDA):  
<https://www.fns.usda.gov/school-meals/program-legislation-regulations>

USDA Memo SP 37-2017: Flexibility for Co-Mingled Preschool Meals: Questions and Answers:  
<https://www.fns.usda.gov/school-meals/flexibility-co-mingled-preschool-meals-questions-and-answers>

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## Websites and Resources

Afterschool Snack Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Afterschool-Snack-Program>

Afterschool Snack Program Handbook (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/ASP/ASPHandbook.pdf>

CSDE Operational Memorandum 06-19: Summary of Federal and State Milk Requirements for the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP) of the NSLP, and Special Milk Program (SMP):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2019/OM06-19.pdf>

Laws and Regulations for Child Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Laws-and-Regulations-for-Child-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs>

Meal Patterns for School Nutrition Programs (Grades K-12) (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Pattern-Training-Materials>

Menu Planning Guide for Preschoolers in the NSLP, SBP, and ASP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Preschool/mpgpreschool.pdf>

Menu Planning Guide for School Meals for Grades K-12 (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Menu-Planning-Guide-for-School-Meals>

Nutrition Standards for CACFP Meals and Snacks (USDA webpage):

<https://www.fns.usda.gov/cacfp/meals-and-snacks>

Operational Memoranda for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Lists/Operational-Memoranda-for-School-Nutrition-Programs>

Policy Memos for School Meals (USDA webpage):

<https://www.fns.usda.gov/school-meals/policy>

Policy Memos for the CACFP (USDA webpage):

<https://www.fns.usda.gov/cacfp/policy>

Program Guidance for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Program-Guidance-School-Nutrition-Programs>

Seamless Summer Option (SSO) of the NSLP (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Seamless-Summer-Option-SSO-of-the-NSLP>

Special Diets in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs>

Special Milk Program (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Milk-Program>

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For more information, visit the Connecticut State Department of Education's (CSDE) [Crediting Foods in School Nutrition Programs](#) and [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpages, or contact the [school nutrition programs staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This document is available at <https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Crediting/ComparisonMilkRequirements.pdf>.

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Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: [program.intake@usda.gov](mailto:program.intake@usda.gov).

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