Using Bulk Milk Dispensers in the School Nutrition Programs

This guidance applies to the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 and preschool (ages 1-5) in the National School Lunch Program (NSLP) and School Breakfast Program (SBP). The Seamless Summer Option (SSO) of the NSLP follows the NSLP and SBP meal patterns.

For information on the meal patterns for the school nutrition programs, visit the Connecticut State Department of Education's (CSDE) Meal Patterns for Grades K-12 in School Nutrition Programs webpage, Meal Patterns for Preschoolers in School Nutrition Programs webpage, and ASP webpage. For information on the crediting requirements, visit the CSDE's Crediting Foods in School Nutrition Programs webpage and Crediting Documentation for the Child Nutrition Programs webpage.

Overview

Milk is a required meal component in the NSLP and SBP meal patterns for grades K-12 and preschool. Bulk milk dispensers are an alternative option to serving milk in disposable cartons or plastic bottles. This milk service option provides environmental, economic, and nutritional benefits. Using bulk milk dispensers can help schools to:

- reduce milk waste and decrease milk costs;
- reduce trash and decrease waste collection expenses; and
- provide milk that stays cold and tastes better, which can increase students' milk consumption for better nutrition.

School food authorities (SFAs) that implement this meal service option for grades K-12 or preschool must comply with all applicable meal pattern requirements for fluid milk.



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Milk Requirements

Milk must be pasteurized, meet all state and local requirements, and contain vitamins A and D at levels specified by the Food and Drug Administration (FDA). Milk served to each age or grade group must provide the minimum meal pattern serving, meet the applicable fat content, and comply with the restrictions for flavored milk.

Milk component for grades K-12

The minimum portion size is 1 cup (8 fluid ounces). SFAs must offer a variety of milk at breakfast and lunch (at least two different choices). At least one choice must be unflavored.

Effective January 14, 2026, the Whole Milk for Healthy Kids Act of 2025 revised the NSLP meal patterns to allow whole and reduced fat (2%) milk, in addition to the previously allowed low-fat (1%) and fat-free milk. Effective June 8, 2026, the USDA final rule, *Expanding Fluid Milk Options in Child Nutrition Programs*, revises the SBP meal patterns to allow whole milk, reduced fat milk, low-fat milk and fat-free milk. Allowable types of milk also include lactose-free and lactose-reduced milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT). For guidance on lactose-free/reduced milk, refer to the CSDE's resource, *Offering Lactose-Free and Lactose-Reduced Milk in the School Nutrition Programs*.

For the meal patterns for grades K-12, flavored milk served in reimbursable meals cannot exceed 10 grams of added sugars per 8 fluid ounces. Flavored milk sold la carte in middle and high schools cannot exceed 15 grams of added sugars per 12 fluid ounces.

Milk component for preschool

The minimum portion size of milk in the NSLP and SBP preschool meal patterns is ½ cup (4 fluid ounces) for ages 1-2 and ¾ cup (6 fluid ounces) for ages 3-5. The preschool meal pattern for age 1 requires unflavored whole milk. Effective June 8, 2026, the USDA final rule, *Expanding Fluid Milk Options in Child Nutrition Programs*, revises the preschool meal patterns for ages 2 and older to allow unflavored whole milk and reduced fat milk, in addition to the previously allowed low-fat and fat-free milk. Allowable types of milk also include lactose-free and lactose-reduced milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT). For guidance on lactose-free/reduced milk, refer to the CSDE's resource, *Offering Lactose-Free and Lactose-Reduced Milk in the School Nutrition Programs*.

A variety of milk is not required for the preschool meal patterns. SFAs may offer any one type of allowable milk to each age group.

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Additional state requirements for public schools

In addition to the USDA's requirements, milk available for sale to students in public schools (as part of and separately from reimbursable meals and afterschool snacks) must comply with the state beverage requirements of Section 10-221q of the Connecticut General Statutes. Milk cannot contain more than 4 grams of total sugars per ounce and cannot contain artificial sweeteners. For more information, visit the CSDE's Beverage Requirements webpage.

Considerations for Bulk Milk

SFAs should assess the following considerations when deciding if bulk milk dispensers are suitable for their schools:

- storage space needed for milk bags, cups, and other equipment;
- dispenser electrical outlet and space requirements;
- reusable or disposable cups;
- additional labor costs to wash reusable cups;
- availability of bulk milk and variety options (fat-free, low-fat, flavored, unflavored) from vendors;
- initial equipment costs such as bulk milk dispenser, cups, dishwashing racks for reusable cups and rack dollies, and optional lids to prevent spilling;
- physical labor required to replace milk bags;
- flow of meal service line and dispenser location; and
- staff and student training and education.

For additional guidance, SFAs may contact their assigned CSDE school nutrition team member.

Implementation Guidelines

- **Location of milk dispenser:** Place the milk dispenser on a counter or table just before the point of service and closer to seating areas to help reduce spills. Make sure that there is space for students to place their tray while using the milk dispenser.

- **Cup size:** Use durable reusable cups that are at least the minimum size to accommodate the minimum meal pattern serving for each age group. Use a 10-fluid ounce cup to provide 8 fluid ounces for grades K-12. Use an 8-fluid ounce cup to provide 6 fluid ounces for ages 3-5. Use a 6-fluid ounce cup to provide 4 fluid ounces for ages 1-2. Mark cups with a line at the correct level to help students pour the correct amount. For example, mark cups for grades K-12 with a line at the 8-fluid ounce level.

- **Milk varieties for grades K-12 at breakfast and lunch:** Students must have access to at least two allowable varieties of milk, one of which must be unflavored (refer to "Milk component for grades K-12" in this document).

- **Staff training:** Train food service staff on how to use, refill, and clean the milk machine (refer to "Refills" and "Food safety" in this document). Train point of service staff on how to identify the minimum size required for each age group. For example, staff must be able to visually recognize if a cup contains 8 fluid ounces for grades K-12.

- **Signage for students:** Use positive language to provide age-appropriate instruction for students on how to use the milk dispenser and prevent spills, and encourage students to take the full serving of milk. Put signage on or near the milk dispenser that explains how much milk students must pour, depending on the meal service style and other selected meal components.

- **Offer versus serve (OVS) for grades K-12:** If a school implements OVS, students may select less than the full portion of milk if they select the minimum required meal components (lunch) or food items (breakfast) for a reimbursable meal. For guidance on OVS, visit the CSDE's Offer versus Serve for School Nutrition Programs webpage.

- **Refills:** Implement a plan for food service staff to manage milk dispenser refills during or between meal services.

- **Food safety:** Milk dispensers must be cleaned and sanitized on a regular basis. Follow local food safety and sanitation guidelines to ensure that dispensers keep milk within safe temperature ranges and milk spouts are kept clean. SFAs should reference the Institute of Child Nutrition's (ICN) applicable standard operating procedures (SOPs) in their Hazard Analysis Critical Control Point (HACCP) food safety plan, including Hot and Cold Holding for Time Temperature Control for Safety Foods, Preventing Contamination at Food Bars, and Receiving Deliveries Standard Operating Procedures.

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Resources

Beverage Requirements (CSDE webpage):
https://portal.ct.gov/sde/nutrition/beverage-requirements

Bulk Milk Success Guide (New England Dairy):
https://www.newenglanddairy.com/wp-content/uploads/Bulk-Milk-Success-Guide-2024.pdf

Crediting Documentation for the Child Nutrition Program (CSDE webpage):
https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs

Crediting Foods in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs

Hazard Analysis Critical Control Point (HACCP) (CSDE's Food Safety for Child Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/food-safety-for-child-nutrition-programs/haccp

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/meal-patterns-school-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

Milk Component (CSDE's Crediting Foods in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/milk

NSLP Regulations 7 CFR 210.10(d): Fluid Milk Requirements (USDA):
https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210#p-210.10(d)

NSLP Regulations 7 CFR 210.10(p)(2): Preschooler lunch meal pattern table (USDA):
https://www.ecfr.gov/current/title-7/part-210#p-210.10(p)(2)

Offer versus Serve for School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/offer-versus-serve-for-school-nutrition-programs

Offering Lactose-Free and Lactose-Reduced Milk in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/lactose_free_reduced_milk_snp.pdf

SBP Regulations 7 CFR 220.8(d): Fluid Milk Requirements (USDA):
https://www.ecfr.gov/current/title-7/part-220#p-220.8(d)

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SBP Regulations 7 CFR 220.8(o): Breakfast requirements for preschoolers (USDA):
https://www.ecfr.gov/current/title-7/part-220#p-220.8(o)

Standard Operating Procedures (Institute of Child Nutrition):
https://theicn.org/icn-resources-a-z/standard-operating-procedures/

USDA Final Rule: Expanding Fluid Milk Options in Child Nutrition Programs (91 FR 25073):
https://www.fna.usda.gov/cn/fr-050826

USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program:
https://www.fna.usda.gov/nslp/wmfhka-implementation

Whole Milk for Healthy Kids Act of 2025:
https://www.congress.gov/bill/119th-congress/senate-bill/222/text

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For more information, visit the CSDE's Crediting Foods in School Nutrition Programs webpage or contact the school nutrition programs staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/bulk_milk_snp.pdf.

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