

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

## School Year 2024-25 (July 1, 2024, through June 30, 2025)

This document compares the requirements for milk in the U.S. Department of Agriculture’s (USDA) meal patterns for grades K-12 and preschool (ages 1-5) in the school nutrition programs, including the updates required by the USDA final rule, *Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans*. The school nutrition programs include 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 SSO follows the NSLP and SBP meal patterns.

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## Milk Component

The USDA regulations define different requirements for the milk component in the NSLP, SBP, ASP, and SMP meal patterns for grades K-12 and preschool.

- **Grades K-12:** The milk requirements for grades K-12 are defined by the USDA regulations for the NSLP ([7 CFR 210](#)), SBP ([7 CFR 220](#)), and SMP ([7 CFR 215](#)), and the updates required by the USDA final rule, [Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#) (89 FR 31962).
- **Preschool (ages 1-5):** The milk requirements for the preschool meal patterns are defined in [7 CFR 210.10\(p\)](#) (lunch), [7 CFR 220.8\(o\)](#) (breakfast), and [7 CFR 210.10\(o\)\(3\)](#) (snack), and the updates required by the USDA final rule, [Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#). The preschool meal patterns follow the requirements of the Child and Adult Care Food Program (CACFP) meal patterns for children ([7 CFR 226.20](#)).

School food authorities (SFAs) must ensure that milk meets the specific meal pattern requirements for each school nutrition program and grade group.

For information on the NSLP and SBP meal pattern and crediting requirements for grades K-12, refer to the Connecticut State Department of Education's (CSDE) [Menu Planning Guide for Grades K-12 in the National School Lunch Program and School Breakfast Program](#) and visit the CSDE's [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage and [Crediting Foods in School Nutrition Programs](#) webpage.

For information on the ASP meal pattern and crediting requirements for grades K-12, refer to the CSDE's [Afterschool Snack Program Handbook](#) and visit the CSDE's [Afterschool Snack Program \(ASP\)](#) webpage.

For information on the NSLP, SBP, and ASP preschool meal pattern and crediting requirements, refer to the CSDE's [Menu Planning Guide for the Preschool Meal Patterns of the School Nutrition Programs](#) and visit the CSDE's [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpage.

For information on the SMP, visit the CSDE's [Special Milk Program \(SMP\)](#) webpage.

## Additional State Requirements for Public Schools

In addition to the USDA meal pattern requirements, milk and nondairy milk substitutes sold to students in public schools must also comply with the state beverage requirements of [Section 10-221q](#) of the Connecticut General Statutes (C.G.S.). These requirements apply to all milk and nondairy milk substitutes sold as part of and separately from school meals in public schools. For more information, visit the CSDE's [Beverage Requirements](#) webpage.

## Change to Milk Component for School Year 2025-26

Effective July 1, 2025, the USDA final rule, [Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans](#), establishes a sugar limit for flavored milk. Flavored milk cannot exceed 10 grams of added sugars per 8 fluid ounces. Flavored milk sold as a competitive food in middle and high schools cannot exceed 15 grams of added sugars per 12 fluid ounces.

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## Comparison Chart for the Milk Component

Milk component requirement	Grades K-12: NSLP, SBP, and SSO	Grades K-12: ASP and SMP	Preschool (ages 1-5): NSLP, SBP, and SSO	Preschool (ages 1-5): ASP and SMP
<b>M1:</b> Fat content	Must be low-fat or fat-free milk.	Same	<b>Age 1:</b> Must be whole milk <b>Ages 2-5:</b> Must be low-fat milk or fat-free milk	Same
<b>M2:</b> Flavored milk	<p>Allowed: Must be low-fat or fat-free milk. <b>Sugar limit for flavored milk:</b> None through June 30, 2025</p> <p><b>Change for school year 2025-26:</b> Effective July 1, 2025, the USDA final rule, <i>Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans</i>, establishes a new sugar limit for flavored milk. Flavored milk cannot exceed 10 grams of added sugars per 8 fluid ounces. Flavored milk sold as a competitive food in middle and high schools cannot exceed 15 grams of added sugars per 12 fluid ounces.</p>	Same	<p>Not allowed. Milk must be unflavored.</p> <p><b>Sugar limit for flavored milk:</b> Not applicable: The preschool meal patterns do not allow flavored milk.</p>	Same

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Milk component requirement	Grades K-12: NSLP, SBP, and SSO	Grades K-12: ASP and SMP	Preschool (ages 1-5): NSLP, SBP, and SSO	Preschool (ages 1-5): ASP and SMP
<p><b>M3:</b> <b>Allowable types of milk</b></p>	<p><b>Allowable types:</b> Any of the following types of low-fat (1%) milk and fat-free milk, either unflavored or flavored: lactose-reduced milk, lactose-free milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT) milk.</p> <p><b>Additional state milk requirements for public schools:</b> In addition to the USDA’s requirements, milk available for sale to students 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 ounce. Products that meet the federal and state requirements are in <a href="#">list 16</a> 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="#">CSDE Operational Memorandum No. 06-19:</a>                      Summary of Federal and State Milk Requirements for the NSLP, SBP, SSO of the NSLP, ASP of the NSLP, and Special Milk Program (SMP)  <a href="#">List of Acceptable Foods and Beverages</a> (CSDE webpage)  <a href="#">Milk Component for Grades K-12</a> (CSDE webpage)</p>	<p>Same</p>	<p><b>Allowable types:</b> Any of the following types of unflavored milk that meet the fat content restrictions for each age group (refer to “<a href="#">M1: Fat content</a>”): lactose-reduced milk, lactose-free milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT) milk. Breastmilk meets the milk component and may be served in place of fluid milk.</p> <p><b>Additional state milk requirements for public schools:</b> Same</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="#">Milk Component for Preschoolers</a> (CSDE webpage)  <a href="#">Serving Milk in the CACFP</a> (USDA)</p>	<p>Same</p>

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

Milk component requirement	Grades K-12: NSLP, SBP, and SSO	Grades K-12: ASP and SMP	Preschool (ages 1-5): NSLP, SBP, and SSO	Preschool (ages 1-5): ASP and SMP
<b>M4:</b> <b>Milk variety</b>	<b>Required:</b> SFAs must serve at least two different choices of milk. At least one choice must be unflavored fat-free or low-fat milk.	Not required. SFAs may serve one type of allowable milk to all children (refer to “ <a href="#">M3: Allowable types of milk</a> ”).	Same	Same

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Milk component requirement	Grades K-12: NSLP, SBP, and SSO	Grades K-12: ASP and SMP	Preschool (ages 1-5): NSLP, SBP, and SSO	Preschool (ages 1-5): ASP and SMP
<p><b>M5:</b> <b>Nondairy milk substitutes for children without a disability</b></p>	<p><b>Allowable nondairy beverages:</b> Nondairy beverages that are nutritionally equivalent to cow’s milk may be served to children whose dietary needs do not constitute a disability if requested in writing by a parent or guardian. The nutrition standards for fluid milk substitutes are defined by the NSLP regulations (<a href="#">7 CFR 210.10</a>).</p> <p>Effective with school year 2024-25 (beginning July 1, 2024), the USDA final rule, <a href="#">Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans</a>, updates the units for vitamin A and vitamin D requirements for fluid milk substitutes to align with the Food and Drug Administration (FDA) labeling requirements. For vitamin A, instead of 500 IUs, the unit requirement is now 150 mcg retinol activity equivalents (RAE) per 8 fluid ounces. For vitamin D, instead of 100 IUs, the unit requirement is now 2.5 mcg per 8 fluid ounces. The amount of vitamin A and vitamin D required in fluid milk substitutes does not change; only the unit of measurement has changed to conform to FDA labeling requirements.</p> <p>For more information, refer to the CSDE’s resource, <a href="#">Allowable Milk Substitutes for Children without Disabilities in the USDA School Nutrition Programs</a>.</p> <p><b>Other beverages:</b> SFAs cannot offer any other beverages (including water and juice) in place of milk for reimbursable meals.</p>	<p>Same</p>	<p>Same</p>	<p>Same</p>

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Milk component requirement	Grades K-12: NSLP, SBP, and SSO	Grades K-12: ASP and SMP	Preschool (ages 1-5): NSLP, SBP, and SSO	Preschool (ages 1-5): ASP and SMP
<b>M5:</b> <b>Nondairy milk substitutes for children without a disability, continued</b>	<b>Additional state requirements for public schools:</b> In addition to the USDA requirements, nondairy milk substitutes available for sale to students in public schools must meet the beverage requirements of C.G.S. <a href="#">Section 10-221q</a> . Nondairy milk substitutes cannot contain artificial sweeteners and cannot exceed 4 grams of sugar per fluid ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fat. Products that meet the federal and state requirements are in <a href="#">list 17</a> on the CSDE's <a href="#">List of Acceptable Foods and Beverages</a> webpage.	Same	Same	Same
<b>M5:</b> <b>Nondairy milk substitutes for children without a disability, continued</b>	<b>Resources</b> <a href="#">Allowable Milk Substitutes for Children without Disabilities in the USDA School Nutrition Programs</a> (CSDE) <a href="#">Beverage Requirements</a> (CSDE webpage) <a href="#">Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in School Nutrition Programs</a> (CSDE) <a href="#">Guide to Meal Modifications in School Nutrition Programs</a> (CSDE) <a href="#">List of Acceptable Foods and Beverages</a> (CSDE webpage) <a href="#">USDA Memo SP 07-2010, CACFP 04-2010, and SFSP 05-2010: Questions and Answers: Fluid Milk Substitutions</a>	Same	Same	Same

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## Regulations and Policy

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

Final Rule (81 FR 24347): CACFP Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010  
<https://www.fns.usda.gov/cacfp/fr-042516>

National School Lunch Program Regulations (7 CFR 210):  
<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210>

Program Legislation and Regulations (USDA):  
<https://www.fns.usda.gov/cn/program-legislation-regulations>

School Breakfast Program Regulations (7 CFR 220):  
<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220>

Special Milk Program Regulations (7 CFR 215):  
<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-215>

USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962):  
<https://www.federalregister.gov/documents/2024/04/25/2024-08098/child-nutrition-programs-meal-patterns-consistent-with-the-2020-2025-dietary-guidelines-for>

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>

USDA Memo SP 38-2019: Meal Requirements under the National School Lunch Program and School Breakfast Program: Q&As for Program Operators:  
<https://www.fns.usda.gov/cn/meal-requirements-under-national-school-lunch-program-and-school-breakfast-program>

## 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/asp\\_handbook.pdf](https://portal.ct.gov/-/media/sde/nutrition/asp/asp_handbook.pdf)

CSDE Operational Memorandum No. 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>

Food Buying Guide Section 5: Overview of Crediting Requirements for the Milk Component (USDA):  
[https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/USDA\\_FBG\\_Section5\\_Milk.pdf](https://foodbuyingguide.fns.usda.gov/Content/TablesFBG/USDA_FBG_Section5_Milk.pdf)

Food Buying Guide Section 5: Yield Table for Milk (USDA):  
[https://foodbuyingguide.fns.usda.gov/files/Reports/USDA\\_FBG\\_Section5\\_MilkYieldTable.pdf](https://foodbuyingguide.fns.usda.gov/files/Reports/USDA_FBG_Section5_MilkYieldTable.pdf)

Laws and Regulations for Child Nutrition Programs (CSDE webpage):  
<https://portal.ct.gov/sde/nutrition/laws-and-regulations-for-child-nutrition-programs>



## Comparison of the Milk Component Requirements in the Meal Patterns for 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>

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 the Preschool Meal Patterns of the School Nutrition Programs (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/nslp/preschool/menu\\_planning\\_guide\\_preschool.pdf](https://portal.ct.gov/-/media/sde/nutrition/nslp/preschool/menu_planning_guide_preschool.pdf)

Menu Planning Guide for Grades K-12 in the National School Lunch Program and School Breakfast Program (CSDE):

<https://portal.ct.gov/sde/nutrition/menu-planning-guide-for-school-meals>

Milk Component for Grades K-12 (“Documents/Forms” section of CSDE’s Crediting Foods in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/crediting-foods-in-school-nutrition-programs/documents#Milk>

Milk Component for Grades K-12 in the ASP (“Documents/Forms” section of the CSDE’s Afterschool Snack Program webpage):

<https://portal.ct.gov/sde/nutrition/afterschool-snack-program/documents#MilkK12>

Milk Component for Preschool (“Related Resources” section of the CSDE’s Meal Patterns for Preschoolers in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/related-resources#Milk>

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 Child Nutrition Programs (USDA FNS Documents & Resources webpage):

<https://www.fns.usda.gov/resources>

Program Guidance for School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/program-guidance-school-nutrition-programs>

Resources for the Preschool Meal Patterns (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/nslp/preschool/resources\\_preschool\\_meal\\_patterns.pdf](https://portal.ct.gov/-/media/sde/nutrition/nslp/preschool/resources_preschool_meal_patterns.pdf)

Resources for the School Meal Patterns for Grades K-12 (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/nslp/meal\\_pattern/resources\\_school\\_meal\\_patterns\\_grades\\_k-12.pdf](https://portal.ct.gov/-/media/sde/nutrition/nslp/meal_pattern/resources_school_meal_patterns_grades_k-12.pdf)

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>

Upcoming Meal Pattern Changes (CSDE’s Meal Patterns for Grades K-12 in School Nutrition Programs webpage):

[https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs#Upcoming\\_Meal\\_Pattern\\_Changes](https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs#Upcoming_Meal_Pattern_Changes)

Updates to the School Nutrition Standards (USDA webpage):

<https://www.fns.usda.gov/cn/school-nutrition-standards-updates>

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

For more information, visit the CSDE's [Crediting Foods in School Nutrition Programs](#) and [Meal Patterns for Preschoolers in School Nutrition Programs](#) webpages 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/comparison\\_milk\\_requirements\\_snp.pdf](https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/comparison_milk_requirements_snp.pdf)

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Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: [program.intake@usda.gov](mailto:program.intake@usda.gov)

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