

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

School Year 2025-26 (July 1, 2025, through June 30, 2026)

This document compares the requirements for the milk component 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, SBP, and ASP 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 the "[Meal Patterns and Crediting](#)" section of the 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.



Contents

Milk Component.....	2
Additional State Requirements for Public Schools.....	3
Comparison Chart for the Milk Component	3
Resources.....	9

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

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 the NSLP, SBP, and ASP meal patterns 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). In addition, effective January 14, 2026, the [Whole Milk for Healthy Kids Act of 2025](#) amends the Richard B. Russell National School Lunch Act to revise the milk requirements for the NSLP only.
- **Preschool (ages 1-5):** The milk requirements for the NSLP, SBP, and ASP 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 all milk offered in reimbursable meals and afterschool snacks meets the specific meal pattern requirements for each school nutrition program and grade group.

For information on the meal patterns for the school nutrition programs, visit the CSDE's [Meal Patterns for Grades K-12 in School Nutrition Programs](#) webpage, [ASP](#) webpage, and [Menu Planning Guidance for School Meals for Grades K-12](#) 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.

For information on the NSLP, SBP, and ASP preschool meal pattern and crediting requirements, 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.

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

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 reimbursable meals and afterschool snacks in public schools. For more information, visit the CSDE's [Beverage Requirements](#) webpage.

Comparison Chart for the Milk Component

The chart below compares the milk requirements for the meal patterns for grades K-12 and preschool (ages 1-5) in the school nutrition programs.

Note: The information in this chart is based on the current guidance in [USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program](#). Additional guidance from the USDA may impact how the [Whole Milk for Healthy Kids Act of 2025](#) applies to school nutrition programs other than the NSLP, including the SBP, SSO, ASP, and SMP.

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Fat content	SBP: Must be low-fat or fat-free milk. NSLP: Effective January 14, 2026, the Whole Milk for Healthy Kids Act of 2025 amends the Richard B. Russell National School Lunch Act to revise the milk requirements for the NSLP. Milk may be whole, reduced-fat (2%), low-fat (1%) or fat-free.	Age 1: Must be whole milk Ages 2-5: Must be low-fat milk or fat-free milk

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Flavored milk	Allowed: Must be low-fat or fat-free milk for the SBP, ASP, and SMP. May be whole, reduced-fat (2%), low-fat (1%) or fat-free for the NSLP. Added sugars limit for flavored milk: Flavored milk in reimbursable meals and afterschool snacks 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.	Not applicable: Milk must be unflavored.

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Allowable types of milk	SBP: Any of the following types of unflavored or flavored low-fat (1%) or fat-free milk: lactose-reduced milk, lactose-free milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT) milk. NSLP: Any of the following types of unflavored or flavored whole, reduced-fat (2%), low-fat (1%) or fat-free milk: lactose-reduced milk, lactose-free milk, acidified milk, cultured milk, cultured buttermilk, and Ultra High Temperature (UHT) milk. Resources Beverage Requirements (CSDE webpage) CSDE Operational Memorandum No. 06-19: Summary of Federal and State Milk Requirements for the NSLP, SBP, SSO of the NSLP, ASP of the NSLP, and Special Milk Program (SMP) List 16: Milk (CSDE's List of Acceptable Foods and Beverages) Milk Component (CSDE's Crediting Foods in School Nutrition Programs webpage) USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program Whole Milk for Healthy Kids Act of 2025	Any of the following types of unflavored milk that meet the fat content restrictions for each age group (refer to "Fat content"): 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. Resources Beverage Requirements (CSDE webpage) Milk Component (CSDE's Crediting Foods in School Nutrition Programs webpage) Serving Milk in the CACFP (USDA) USDA Memo CACFP 01-2025: Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the Child and Adult Care Food Program, Questions and Answers

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Additional state milk 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 C.G.S. Section 10-221q. Milk cannot contain more than 4 grams of total sugars per ounce and cannot contain artificial sweeteners. Products that meet the federal and state requirements are in list 16 on the CSDE's List of Acceptable Foods and Beverages webpage. Resources Allowable Beverages for Connecticut Public Schools (CSDE) Beverage Requirements (CSDE webpage) List 16: Milk (CSDE's List of Acceptable Foods and Beverages)	Same
Milk variety	Required for NSLP, SBP, and SSO: SFAs must serve at least two different choices of allowable milk (refer to "Allowable types of milk"). At least one choice must be unflavored. Not required for ASP and SMP: SFAs may serve one type of allowable milk to all children (refer to "Allowable types of milk").	Not required. SFAs may serve one type of allowable milk to all children.

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Milk substitutes for non-disability reasons	SFAs may choose to offer optional nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes (7 CFR 210.10(d)(2)(ii)) to children whose dietary needs do not constitute a disability. For more information, refer to the CSDE's resource, Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs. SFAs cannot offer any other beverages (including water and juice) in place of milk for reimbursable meals. Milk substitutes for the SBP, ASP, SSO, and SMP require a written statement from the parent/guardian that identifies the need for the milk substitute. This statement is not required for the NSLP. Resources Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs (CSDE) Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs (CSDE) Guide to Meal Modifications in School Nutrition Programs (CSDE) List 17: Dairy Alternatives (CSDE's List of Acceptable Foods and Beverages) Milk Substitutes (CSDE's Special Diets in School Nutrition Programs webpage) USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program	Same, except the written statement from the parent/guardian that identifies the need for the milk substitute is required for all preschool school nutrition programs (NSLP, SBP, ASP, SSO, and SMP)

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Requirement	Grades K-12: NSLP, SBP, ASP, SSO, SMP	Preschool (ages 1-5): NSLP, SBP, ASP, SSO, SMP
Additional state requirements for nondairy milk substitutes in public schools:	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. Section 10-221q. 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 list 17 on the CSDE's List of Acceptable Foods and Beverages webpage. Resources Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs (CSDE) Beverage Requirements (CSDE webpage) Guide to Meal Modifications in School Nutrition Programs (CSDE) Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs (CSDE) List 17: Dairy Alternatives (CSDE's List of Acceptable Foods and Beverages) Milk Substitutes (CSDE's Special Diets in School Nutrition Programs webpage)	Same

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

Resources

[Afterschool Snack Program](#) (CSDE webpage):

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

[Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs](#) (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/milk_substitutes_snp.pdf

[Crediting Documentation for the Child Nutrition Programs](#) (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/crediting-documentation-for-the-child-nutrition-programs>

[Crediting Summary Charts for the Meal Patterns for the School Nutrition Programs](#) (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/crediting/crediting_summary_charts_snp.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/om07-19.pdf>

[Food Buying Guide for Child Nutrition Programs, Section 5: Milk Component](#) (USDA):

<https://www.fns.usda.gov/tn/fbg>

[Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs](#) (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/identify_allowable_nondairy_milk_substitutes_snp.pdf

[List of Acceptable Foods and Beverages](#) (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/list-of-acceptable-foods-and-beverages>

[Meal Pattern and Crediting Resources for the School Nutrition Programs](#) (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/meal_pattern/resources_school_meal_patterns_snp.pdf

[Meal Patterns for Grades K-12 in School Nutrition Programs](#) (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs>

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

[Meal Patterns for Preschoolers in School Nutrition Programs](https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs) (CSDE webpage):

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

[Menu Planning Guidance for School Meals for Grades K-12](https://portal.ct.gov/sde/nutrition/menu-planning-guidance-for-school-meals) (CSDE):

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

[Menu Planning Guidance Series for the Preschool Meal Patterns of the School Nutrition Programs](https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs#MenuPlanningGuidanceSeries) (CSDE):

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

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

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

[Milk Substitutes](https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs/milk-substitutes) (CSDE's Special Diets in School Nutrition Programs webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs/milk-substitutes>

[Module 3: Meal Pattern Comparison of Preschool and Grades K-12](https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/preschool-meal-pattern-training#module3) (CSDE's Preschool Meal Pattern Training for the School Nutrition Programs):

<https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/preschool-meal-pattern-training#module3>

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

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210>

[Preschool Meal Pattern Training for the School Nutrition Programs Module 4: Milk Component](https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/preschool-meal-pattern-training) (CSDE):

<https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs/preschool-meal-pattern-training>

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

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220>

[Special Diets in School Nutrition Programs](https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs) (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs>

[Special Milk Program](https://portal.ct.gov/sde/nutrition/special-milk-program) (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/special-milk-program>

Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

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

<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 01-2025: Fluid Milk Requirements for School Meals:](https://www.fns.usda.gov/cn/fluid-milk-requirements-schools)

<https://www.fns.usda.gov/cn/fluid-milk-requirements-schools>

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

<https://www.fns.usda.gov/nslp/wmfhka-implementation>

[What's in a Meal Module 9: Milk Component](https://portal.ct.gov/sde/nutrition/meal-pattern-training-materials#module9) (CSDE's Training Program, What's in a Meal: National School Lunch Program and School Breakfast Program Meal Patterns for Grades K-12):

<https://portal.ct.gov/sde/nutrition/meal-pattern-training-materials#module9>

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

<https://www.congress.gov/bill/119th-congress/senate-bill/222/text>

For more information, visit the CSDE's [Crediting Foods in School Nutrition Programs](https://portal.ct.gov/sde/nutrition/nslp/crediting/resources_school_meal_patterns_snp.pdf) webpage or contact the [school nutrition programs staff](https://portal.ct.gov/sde/nutrition/nslp/crediting/resources_school_meal_patterns_snp.pdf) 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/resources_school_meal_patterns_snp.pdf.



Comparison of the Milk Component Requirements for the Meal Patterns for School Nutrition Program

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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

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