

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](#) and the [Whole Milk for Healthy Kids Act of 2025](#). The school nutrition programs include the [National School Lunch Program \(NSLP\)](#), [School Breakfast Program \(SBP\)](#), [Afterschool Snack Program \(ASP\)](#) of the NSLP, [Seamless Summer Option \(SSO\)](#) 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.

Note: The information in this document for the allowable types of milk and the requirements for requesting fluid milk substitutes for non-disability reasons is based on the USDA's guidance in [USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program](#) and is subject to change. 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. The CSDE will update this document as the USDA issues future guidance.

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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 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.

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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 10-221g](#) 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.



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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.

Requirement	Grades K-12	Preschool (ages 1-5)
Fluid milk	<p>The milk component requires fluid milk as a beverage. Milk does not credit when cooked or baked in foods, such as cereals, puddings, cream sauces, and other foods.</p> <p>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).</p> <p>Resources</p> <p>Milk Component (CSDE's Crediting Foods in School Nutrition Programs webpage)</p> <p>USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals</p>	Same

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Requirement	Grades K-12	Preschool (ages 1-5)
Fat content	<p>SBP, ASP, and SMP: Must be low-fat or fat-free milk.</p> <p>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 any fat content: whole, reduced-fat (2%), low-fat (1%), or fat-free.</p> <p>Resources</p> <p>NSLP Regulations 7 CFR 210.10(d)(1)(ii): Types of fluid milk:</p> <p>NSLP Regulations 7 CFR 210.10(o)(2): Afterschool snacks served to K through 12 children</p> <p>SBP Regulations 7 CFR 220.8(d): Fluid milk requirements</p> <p>USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals</p> <p>USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program</p> <p>Whole Milk for Healthy Kids Act of 2025</p>	<p>Age 1: Must be whole milk.</p> <p>Ages 2-5: Must be low-fat milk or fat-free milk.</p> <p>Resources</p> <p>NSLP Regulations 7 CFR 210.10(d)(1)(ii): Preschooler breakfast meal pattern table</p> <p>NSLP Regulations 7 CFR 210.10(p)(2): Preschooler lunch meal pattern table</p> <p>NSLP Regulations 7 CFR 210.10(o)(3)(ii): Preschooler afterschool snack meal pattern table</p>

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Requirement	Grades K-12	Preschool (ages 1-5)
Flavored milk	<p>SBP, ASP, and SMP: Flavored milk must be low fat or fat free and cannot exceed the limit for added sugars.</p> <p>NSLP: Flavored milk may be whole, reduced fat (2%), low fat (1%), or fat free and cannot exceed the limit for added sugars.</p> <p>Limit for added sugars in 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.</p> <p>Resources</p> <p>USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals</p> <p>USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program</p> <p>Whole Milk for Healthy Kids Act of 2025</p> <p>NSLP Regulations 7 CFR 210.10(o)(2): Afterschool snacks served to K through 12 children</p> <p>NSLP Regulations 7 CFR 210.10(d)(1)(ii): Types of fluid milk</p> <p>SBP Regulations 7 CFR 220.8(d): Fluid milk requirements</p>	Not applicable: Milk must be unflavored.

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Requirement	Grades K-12	Preschool (ages 1-5)
Allowable types of milk	<p>SBP: Unflavored or flavored low-fat (1%) milk and fat-free milk, including lactose-free/reduced milk, acidified milk (e.g., acidified kefir milk and acidified acidophilus milk), cultured milk (e.g., cultured buttermilk, cultured kefir milk, and cultured acidophilus milk), and Ultra High Temperature (UHT) milk.</p> <p>NSLP: Unflavored or flavored whole, reduced-fat (2%), low-fat (1%), and fat-free milk, including lactose-free/reduced milk, acidified milk (e.g., acidified kefir milk and acidified acidophilus milk), cultured milk (e.g., cultured buttermilk, cultured kefir milk, and cultured acidophilus milk), and Ultra High Temperature (UHT) milk.</p> <p>Additional state requirements for public schools only: Milk available for sale to students in public schools must also meet the beverage requirements of C.G.S. Section 10-221q (refer to “Additional state milk requirements for public schools” in this chart).</p> <p>Resources</p> <p>Beverage Requirements (CSDE webpage)</p> <p>List 16: Milk (CSDE’s List of Acceptable Foods and Beverages webpage)</p> <p>Milk Component (CSDE’s Crediting Foods in School Nutrition Programs webpage)</p> <p>USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals</p> <p>USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program</p> <p>Whole Milk for Healthy Kids Act of 2025</p>	<p>Any of the following types of unflavored milk with the required fat content for each age group (refer to “Fat content” in this chart): whole milk for age 1 and low-fat or fat-free milk for ages 2-5, including lactose-free/reduced milk, acidified milk (e.g., acidified kefir milk and acidified acidophilus milk), cultured milk (e.g., cultured buttermilk, cultured kefir milk, and cultured acidophilus milk), and Ultra High Temperature (UHT) milk. Breastmilk meets the milk component and may be served in place of fluid milk.</p> <p>Resources</p> <p>Beverage Requirements (CSDE webpage)</p> <p>Milk Component (CSDE’s Crediting Foods in School Nutrition Programs webpage)</p> <p>Serving Milk in the CACFP (USDA)</p> <p>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</p>

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Requirement	Grades K-12	Preschool (ages 1-5)
Additional state milk requirements for public schools	<p>In addition to the USDA's requirements for fluid milk (refer to "Allowable types of milk" in this chart), all milk available for sale to students in public schools must comply with the state beverage requirements of C.G.S. Section 10-221g. Milk cannot contain more than 4 grams of total sugars per ounce and cannot contain artificial sweeteners. These requirements apply to milk sold as part of and separately from reimbursable meals and afterschool snacks.</p> <p>Products that meet the federal and state requirements for milk are included on the CSDE's List of Acceptable Foods and Beverages webpage</p> <p>Resources</p> <p>Allowable Beverages for Connecticut Public Schools (CSDE)</p> <p>Beverage Requirements (CSDE webpage)</p> <p>List 16: Milk (CSDE's List of Acceptable Foods and Beverages webpage)</p>	Same
Milk variety	<p>NSLP and SBP: SFAs must serve at least two different choices of allowable milk (refer to "Allowable types of milk" in this chart). At least one choice must be unflavored.</p> <p>ASP and SMP: A milk variety is not required. SFAs may serve one type of allowable milk to all children (refer to "Allowable types of milk" in this chart).</p>	A milk variety is not required. SFAs may serve one type of allowable milk to all children.

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Requirement	Grades K-12	Preschool (ages 1-5)
Optional fluid milk substitutes (nondairy beverages) for non-disability reasons	<p>SFAs may choose to offer one or more fluid milk substitutes (nondairy beverages) to all children whose dietary needs do not constitute a disability. Fluid milk substitutes are plant-based beverages like fortified soy milk that are intended to replace cow's milk. Fluid milk substitutes must meet the USDA's nutrition standards for fluid milk substitutes (7 CFR 210.10(d)(2)(ii)).</p> <p>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>Additional state requirements for public schools only: Nondairy beverages available for sale to students in public schools must also meet the beverage requirements of C.G.S. Section 10-221q (refer to "Additional state nondairy beverage requirements for public schools" in this chart).</p> <p>Resources</p> <p>Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs (CSDE)</p> <p>Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs (CSDE)</p> <p>Guide to Meal Modifications in School Nutrition Programs (CSDE)</p> <p>List 17: Dairy Alternatives (CSDE's List of Acceptable Foods and Beverages)</p> <p>Milk Substitutes (CSDE's Special Diets in School Nutrition Programs webpage)</p> <p>USDA Memo SP 01-2025: Fluid Milk Requirements for School Meals</p> <p>USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program</p>	<p>Same</p>

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Requirement	Grades K-12	Preschool (ages 1-5)
Additional state nondairy beverage requirements for public schools	<p>In addition to the USDA's requirements for fluid milk substitutes (nondairy beverages) (refer to "Optional fluid milk substitutes (nondairy beverages) for non-disability reasons" in this chart), all nondairy beverages 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. These requirements apply to nondairy beverages sold as part of and separately from reimbursable meals and afterschool snacks.</p> <p>Products that meet the federal and state requirements for nondairy milk substitutes are included on the CSDE's List of Acceptable Foods and Beverages webpage.</p> <p>Resources</p> <p>Allowable Fluid Milk Substitutes for Non-Disability Reasons in the School Nutrition Programs (CSDE)</p> <p>Beverage Requirements (CSDE webpage)</p> <p>Guide to Meal Modifications in School Nutrition Programs (CSDE)</p> <p>Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs (CSDE)</p> <p>List 17: Dairy Alternative Beverages (CSDE's List of Acceptable Foods and Beverages)</p> <p>Milk Substitutes (CSDE's Special Diets in School Nutrition Programs webpage)</p>	Same

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Requirement	Grades K-12	Preschool (ages 1-5)
Documentation for requesting fluid milk substitutes for non-disability reasons	<p>SBP, ASP, and SMP: Milk substitutes for non-disability reasons require a written statement that identifies the need for the milk substitute. This statement may be submitted by the parent/guardian, a state licensed healthcare professional, or a registered dietitian. This statement must be maintained on file with the student's medical records.</p> <p>NSLP: Documentation is not required. Effective January 14, 2026, the Whole Milk for Healthy Kids Act of 2025 rescinds the requirement at lunch for a written statement that identifies the need for the milk substitute for non-disability reasons.</p>	<p>Milk substitutes for non-disability reasons require a written statement that identifies the need for the milk substitute. This statement may be submitted by the parent/guardian, a state licensed healthcare professional, or a registered dietitian. This statement must be maintained on file with the student's medical records.</p>

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Resources

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

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

[Allowable Beverages for Connecticut Public Schools](#) (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/compfoods/allowable_beverages_public_schools.pdf

[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

[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>

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

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

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[Menu Planning Guidance for School Meals for Grades K-12](#) (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](#) (CSDE):

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

[Milk Component](#) (CSDE's Crediting Foods in School Nutrition Programs webpage):

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

[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](#) (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>

[Preschool Meal Pattern Training for the School Nutrition Programs Module 4: Milk Component](#) (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>

[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>

[Special Milk Program Regulations \(7 CFR 215\)](#):

<https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-215>

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[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>

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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/resources_school_meal_patterns_snp.pdf.



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In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted to USDA by:

1. mail: U.S. Department of Agriculture
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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