









This comparison chart provides a brief overview of **proposed and final** provisions included in the 2024 final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans*. This final rule impacts the school meal programs, including the National School Lunch Program (NSLP) and School Breakfast Program (SBP), as well as the Special Milk Program (SMP), where indicated. The purpose of this chart is to show provisions that were finalized from the proposed rule. This chart also highlights provisions that were not finalized or were revised based on feedback received from public comments.



Some provisions included in this rulemaking also impact the Summer Food Service Program (SFSP) and the Child and Adult Care Food Program (CACFP). A comparison chart of the changes impacting SFSP and CACFP can be found [here](#).

Legend:  = proposal was finalized     = proposal was not finalized     = revisions made to the proposal



At a Glance: Comparison Chart for School Meals Programs National School Lunch Program (NSLP) and School Breakfast Program (SBP) of the 2023 Proposed Rule Requirements and 2024 Final Rule Finalized Requirements

Provision	Proposed Rule		Final Rule
<p><b>Added Sugars</b></p>	<p>Proposed product-based limits and a weekly limit for added sugars:</p> <p><u>Product-based limits</u> for grain-based desserts, breakfast cereals, yogurt, and flavored milk with a proposed implementation date of July 1, 2025.</p> <p><u>Weekly added sugars limit</u> that must average less than 10% of calories per week, per program, with a proposed implementation date of July 1, 2027.</p>	<p></p> <p></p> <p></p>	<p><b>Finalizes the proposed product-based limits for breakfast cereals, yogurt, and flavored milk</b> in NSLP and SBP with an implementation date of July 1, 2025. Product-based limit for flavored milk also applies to Smart Snacks in School.</p> <p>Does <b>NOT finalize</b> the proposed product-based limit for grain-based desserts at breakfast. USDA will collect additional information about how to address grain-based deserts in child nutrition programs.</p> <p><b>Finalizes the proposed weekly 10% limit for added sugars</b> in NSLP and SBP with an implementation date of July 1, 2027.</p>







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<p><b>Flavored Milk</b></p>	<p>Proposed two options:</p> <p><u>Alternative A:</u> Allow only unflavored, fat-free and low-fat milk for grades K-8 and allow flavored and unflavored, fat-free and low-fat milk for grades 9-12 with a proposed implementation date of July 1, 2025.</p> <p><u>Alternative B:</u> Continue to allow flavored and unflavored, fat-free and low-fat milks for all grades (K-12).</p> <p><i>Both proposals included the new product-based added sugars limit for flavored milk and would maintain the requirement that unflavored milk is offered at each school meal service.</i></p>	<p></p> <p></p>	<p>Does not finalize Alternative A.</p> <p><b>Finalizes Alternative B and maintains the current requirement to allow flavored and unflavored, fat-free and low-fat milk for all grades.</b></p> <p>This fluid milk standard applies to NSLP, SBP, and Smart Snacks in School, as well as SMP for children 6 and up.</p>



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<p><b>Whole Grains</b></p>	<p>Proposed to maintain the current requirement: at least 80% of the weekly grains offered in school meals must be whole grain-rich, based on ounce equivalents; any remaining grain items offered must be enriched.</p> <p>Offered two additional proposals:</p> <ul style="list-style-type: none"> <li>• Add definition of whole grain-rich to regulations.</li> <li>• Update definition of entrée item to clarify that whole grain-rich and enriched grain entrées may be sold as a “Smart Snack.”</li> </ul>		<p><b>Maintains current whole grain requirements.</b></p> <p>Finalizes the two proposed definitions with an implementation date of July 1, 2024.</p>
<p><b>Sodium: School Lunch</b></p>	<p>Proposed the following sodium reductions for school lunch:</p> <ul style="list-style-type: none"> <li>• Three 10% reductions in SY 2025-2026, SY 2027-2028, and SY 2029-2030 (30% reduction total).</li> </ul>		<p><b>School lunch:</b> Does not finalize proposed sodium limits at lunch.</p> <p><b>Maintains current sodium limit, Sodium Target 1A, at lunch through June 30, 2027.</b></p> <p><b>Finalizes one 15% sodium reduction from current limit for school lunch,</b> which schools must implement by July 1, 2027.</p>




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<b>Sodium: School Breakfast</b>	Proposed the following sodium reductions for school breakfast: <ul style="list-style-type: none"> <li>Two 10% reductions in SY 2025-2026 and SY 2027-2028 (20% reduction total).</li> </ul>	 <p><b>School breakfast:</b> Does not finalize proposed sodium limits at breakfast.</p> <p><b>Maintains current sodium limit, Sodium Target 1, at breakfast through June 30, 2027.</b></p> <p><b>Finalizes one 10% sodium reduction from current limit for school breakfast,</b> which must be implemented by July 1, 2027.</p>
<b>Meats/Meats Alternates at Breakfast</b>	Proposed a combined meats/meat alternates and grains meal component at school breakfast: <ul style="list-style-type: none"> <li>Schools may offer grains, meats/meat alternates, or a combination of both to meet the minimum ounce equivalents in this combined meal component requirement at school breakfast.</li> <li>Removes the requirement to offer 1.0 ounce equivalent of grains each day at breakfast.</li> </ul>	 <p><b>Finalizes the proposal to allow schools, at their option, to offer grains, meats/meat alternates, or a combination of both at breakfast</b> with an implementation date of July 1, 2024.</p>
<b>Substituting Vegetables for Fruits at Breakfast</b>	Proposed to update the vegetable variety requirement for schools that choose to substitute vegetables for fruits at breakfast more than one day per school week: <ul style="list-style-type: none"> <li>Schools choosing to offer vegetables at breakfast <u>one day per school week</u> have the option to offer any vegetable, including a starchy vegetable.</li> </ul>	 <p><b>Finalizes the proposal to allow schools to continue to substitute vegetables for fruits at breakfast and updates the vegetable variety requirement as proposed</b> with an implementation date of July 1, 2024.*</p>




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	<ul style="list-style-type: none"> <li>Schools choosing to substitute vegetables for fruits at breakfast on <u>two or more days per school week</u> are required to offer vegetables from at least two different vegetable subgroups.</li> </ul>		<p>*For School Year 2024-2025, Congress has provided schools the option to offer any vegetables in place of fruits at breakfast (no subgroup requirements).</p>
<p><b>Substituting Vegetables for Grains in Tribal Communities</b></p>	<p>Proposed to allow schools that are Tribally operated, operated by the Bureau of Indian Education, and that serve primarily American Indian or Alaska Native children to serve vegetables to meet the grains requirement.</p>		<p><b>Finalizes the proposal to allow school food authorities and schools that are Tribally operated, operated by the Bureau of Indian Education, and that serve primarily American Indian or Alaska Native children to serve vegetables to meet the grains requirement with an implementation date of July 1, 2024.</b></p>
<p><b>Substituting Vegetables for Grains in Guam and Hawaii</b></p>	<p>Proposed to allow all schools in Guam and Hawaii to substitute vegetables for grains.</p>		<p><b>Finalizes the proposal to allow all schools in Guam and Hawaii to substitute vegetables for grains with implementation date of July 1, 2024.</b></p>

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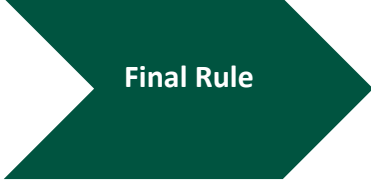



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<b>Traditional Indigenous Foods</b>	<p>Proposed to explicitly include in regulation that traditional foods may be served as part of a reimbursable school meal.</p> <p>Proposed to reference the definition from the Agriculture Improvement Act of 2014, which defines traditional food as “food that has traditionally been prepared and consumed by an [American] Indian Tribe.”</p>		<p><b>Finalizes the proposal to include in regulation that traditional Indigenous foods may be served as part of a reimbursable school meal</b> with an implementation date of July 1, 2024.</p>
<b>Afterschool Snacks</b>	Proposed to align NSLP afterschool snack standards with the CACFP snack standards.		<p><b>Aligns NSLP afterschool snack standards with the CACFP snack standards</b> with an implementation date of July 1, 2025.</p> <p>Makes two minor changes to the proposal, to apply a weekly (rather than daily) juice limit and whole grain-rich requirement to NSLP snacks.</p>
<b>Beans, Peas, and Lentils at Lunch</b>	Proposed to allow legumes offered toward the meats/meat alternates meal component to also count toward the weekly requirement to offer ½ cup of the legumes vegetable subgroup per week at lunch, while maintaining the daily and weekly total vegetables requirement.		<p><b>Finalizes the proposal to allow beans, peas, and lentils offered toward the meats/meat alternates meal component to also count toward the weekly vegetable subgroup requirement</b> with an implementation date of July 1, 2024.</p>

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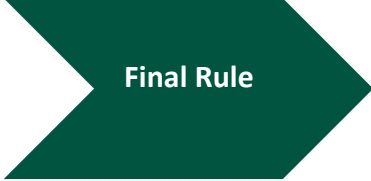


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<b>Nuts and Seeds</b>	Proposed to allow nuts and seeds to credit for 100% of the meats/meat alternates component in all Child Nutrition Programs and meals.		<b>Finalizes the proposal to allow nuts and seeds to credit for 100% of the meats/meat alternates component</b> with an implementation date of July 1, 2024.
<b>Competitive Foods: Bean Dip Exemption</b>	Proposed to add hummus to the list of foods exempt from the total fat standard in the competitive foods regulations (Smart Snacks in Schools), allowing hummus to be sold as a Smart Snack.		<b>Finalizes the proposal to add “bean dip” to the list of foods exempt from the total fat standard in the Smart Snacks in School regulations</b> with an implementation date of July 1, 2024.  The term “bean dip” includes hummus, as well as other dips made with beans, peas, and/or lentils.
<b>Professional Standards: Hiring Exception</b>	Proposed to allow State agency discretion to allow medium or large local educational agencies (LEAs) to hire an individual without a bachelor’s or associate’s degree as a school nutrition program director, if they have at least 10 years of school nutrition program experience.		<b>Finalizes the proposal to allow State agency discretion to allow medium or large LEAs to hire an individual without a bachelor’s or associate’s degree as a school nutrition program director, if they have at least 10 years of school nutrition program experience</b> with an implementation date of July 1, 2024.






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<b>Meal Modifications</b>	Proposed to codify that State licensed healthcare professionals may write medical statements to request modifications on behalf of students with disabilities and to define the term “State licensed healthcare professional” in the school meal program regulations.	 <p><b>Finalizes the proposal</b> with an implementation date of July 1, 2024.</p> <p><b>This final rule also expands the authority to write medical statements to registered dietitians</b> with an implementation date of July 1, 2025.</p>
<b>Fluid Milk Substitutes Nutrient Requirements</b>	Proposed to update Vitamin A and Vitamin D requirements for fluid milk substitutes from International Units to micrograms, consistent with labeling requirements in 2016 rulemaking from the U.S. Food and Drug Administration (FDA).	 <p><b>Finalizes updated Vitamin A and Vitamin D units of measurements for fluid milk substitutes as proposed</b> with an implementation date of July 1, 2024.</p> <p>This applies to fluid milk substitutes offered in NSLP, SBP, and SMP.</p> <p><i>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.</i></p>
<b>Geographic Preference</b>	Proposed to allow “locally grown,” “locally raised,” or “locally caught” to be used as procurement specifications for unprocessed or minimally processed food items.	 <p><b>Finalizes the proposal to allow “locally grown,” “locally raised,” or “locally caught” to be used as procurement specifications</b> with an implementation date of July 1, 2024.</p>

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<b>Buy American</b>	Proposed the following: <ul style="list-style-type: none"> <li>• Update Federal regulations to include current exceptions related to product availability and cost that were previously only provided in guidance.</li> <li>• Set a 5% limit on non-domestic food purchases when a school food authority uses an exception.</li> <li>• Require school food authorities to maintain documentation showing that they do not exceed the non-domestic food purchases limit.</li> <li>• Require school food authorities to include the Buy American provision in all applicable procurement procedures, solicitations, and contracts.</li> <li>• Clarify that over 51% of a food product must consist of agricultural commodities that were grown domestically.</li> <li>• Explain how Buy American applies to fish and fish products.</li> </ul>	 <p><b>Finalizes the proposal but adopts a phased-in approach to implementation of the non-domestic food purchases limit.</b> While the overall implementation date for the Buy American changes is July 1, 2024, the non-domestic food purchases limit will be phased in as follows:</p> <ul style="list-style-type: none"> <li>○ 10% beginning in SY 2025-2026.</li> <li>○ 8% beginning in SY 2028-2029.</li> <li>○ 5% beginning in SY 2031-2032.</li> </ul>
<b>Clarification on Potable Water Requirements</b>	Proposed to expand potable water requirement to include calorie-free, noncarbonated, naturally flavored water.	 <p>Does not finalize the proposal.</p> <p><b>Instead, this final rule clarifies the existing requirement to include in regulation that schools must make “plain” potable water available during the meal service</b> with an implementation date of July 1, 2024.</p>

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			The final rule adds the word “plain” to the potable water regulations to clarify this existing requirement.
<b>Synthetic <i>Trans</i> Fat</b>	Proposed to remove the synthetic <i>trans</i> fat prohibition for NSLP, SBP, and other foods sold to children on campus during the school day.		<b>Removes the synthetic <i>trans</i> fat dietary specification requirement</b> with an implementation date of July 1, 2024.
<b>Misc. Changes: Terminology Changes</b>	<p><b>Terminology Change: Beans, Peas, and Lentils</b> Proposed to change the name of the “legumes (beans and peas)” vegetable subgroup to “beans, peas, and lentils.”</p> <p><b>Terminology Change: Protein Sources</b> Proposed to change the name of the meats/meat alternates meal component in regulations to “protein sources.”</p>	  	<p><b>Changes the name of the “legumes (beans and peas)” vegetable subgroup to “beans, peas, and lentils”</b> with an implementation date of July 1, 2024.</p> <p>Terminology change for protein sources was not finalized. Maintains the meats/meat alternates meal component terminology.</p>