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June 23, 2025

MEMORANDUM

TO: School Nutrition Supervisors
Single Unit and Special School Administrators

FROM: Aimee F. Beam, MS, RD 
Director, Nutrition Programs

RE: **SY 2024-2025 Operational Memo #32**
Enhancing Child Nutrition Program Meal Standards

On June 2, 2025, the United States Department of Agriculture (USDA) Food and Nutrition Service (FNS) released the following policy guidance: SP 15-2025, Enhancing Child Nutrition Program Meal Standards.

This memorandum provides a reminder that additional State-level standards (beyond the Federal nutrition standards) can be implemented to further promote children's health. Additionally, USDA FNS states that *meals and snacks offered through the Child Nutrition Programs may be claimed for Federal reimbursement if they meet the Federal nutrition requirements and other Federal regulations. State agencies may not withhold Federal reimbursement for meals that meet the Federal requirements, even if additional State requirements are not met. However, if a State provides an additional reimbursement above the Federal reimbursement, they may withhold the State reimbursement.*

Per the memorandum, *USDA encourages States to take this opportunity to implement innovative ideas that support healthy choices and healthy outcomes for our Nation's children.*

The memo is attached for your review. Please contact our office with any questions.

Attachment: SP 15-2025

cc: Nutrition Team

Date: June 2, 2025

Memo code: SP 15-2025

Subject: Enhancing Child Nutrition Program Meal Standards

To: State Directors, Child Nutrition Programs, All States

The goal of the U.S. Department of Agriculture's (USDA) Child Nutrition Programs is to provide healthy, balanced meals to children. Every day across the Nation, the National School Lunch Program and School Breakfast Program serve around 30 million and 15 million students, respectively. In the summer months, USDA programs offer meals to nearly 4 million children at schools, summer camps, rural pick-up sites, and other approved settings.

As Secretary of Agriculture, Brooke Rollins has emphasized States' role as innovative collaborators and policy incubators. For too long, the USDA's school meal programs have been known by the regulations and rules they enforce instead of the flexibilities they provide. Schools should and do have the ability to provide children with interesting, healthy, and diverse meals. Whether it is purchasing from a local farmer or testing out a new recipe, the USDA supports and encourages States and school districts experimenting with the meals they provide.

The USDA maintains meal pattern guidelines to ensure that children are getting a variety of nutrients and are offered all the components of a healthy diet. While meals and snacks served through the Child Nutrition Programs must meet minimum Federal nutrition standards, additional State-level standards can further promote children's health. These stronger State-level standards can address reimbursable school meals as well as the food and beverages sold to students on campus throughout the school day through the competitive food requirements, also known as Smart Snacks in School (Smart Snacks). For example, State standards could require that yogurts served as part of reimbursable school meals and as a

Smart Snacks include less added sugars than Federal guidelines allow. Similarly, while the U.S. Food and Drug Administration (FDA) governs food additives like synthetic dyes, States have the flexibility to require schools to stop serving meals and snacks with these harmful additives ahead of the planned phase-out directed by FDA.¹ Other examples of State standards include limiting the sale of ultra-processed foods, further limiting how often juices can be served in place of whole fruits, and implementing a minimum amount of time children must be given to eat their meal.

As a reminder, meals and snacks offered through the Child Nutrition Programs may be claimed for Federal reimbursement if they meet the Federal nutrition requirements and other Federal regulations. State agencies may not withhold Federal reimbursement for meals that meet the Federal requirements, even if additional State requirements are not met. However, if a State provides an additional reimbursement above the Federal reimbursement, they may withhold the State reimbursement.

USDA encourages States to take this opportunity to implement innovative ideas that support healthy choices and healthy outcomes for our Nation's children. In developing these ideas, States also are encouraged to work with local partners to pursue policies that best serve their communities and enhance the health of children. States are invited to share their creative ideas with their Food and Nutrition Service (FNS) Regional Office, as they could become the model for other States and USDA.

¹ U.S. Food and Drug Administration. HHS, FDA to Phase Out Petroleum-Based Synthetic Dyes in Nation's Food Supply. April 22, 2025. Available at: <https://www.fda.gov/news-events/press-announcements/hhs-fda-phase-out-petroleum-based-synthetic-dyes-nations-food-supply>

State agencies are reminded to distribute this information to program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

Tina Namian
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Child Nutrition Programs