



**Georgia Dept  
of Early Care  
and Learning**

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Area Memo: Meals/  
Food Service  
Programs CACFP, SFSP

## Meal Pattern Updates due to 2020-2025 Dietary Guidelines for Americans

### Purpose

The purpose of this memorandum is to provide CACFP institutions and facilities and SFSP sponsors with guidance on CACFP specific regulation changes pertaining to the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans* ("Final Rule").

### Legal Authority

CACFP 07-2024, SFSP 12-2024

### Background

On April 25, 2024, FNS published the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans* ([89 FR 31962](#), April 25, 2024). This rule finalized practical, science-based, long-term school nutrition requirements based on the goals of the *Dietary Guidelines for Americans, 2020-2025 (Dietary Guidelines)*, extensive stakeholder input, and lessons learned from prior rulemakings. This rule also included minor updates to the Child and Adult Care Food Program (CACFP) to better align Child Nutrition Program (CNP) requirements.

### CACFP Program Requirements

#### Added Sugars for Cereal and Yogurt

Prior regulatory requirements advised that breakfast cereals must contain no more than 6 grams of total sugars per dry ounce and yogurt must contain no more than 23 grams of total sugars per 6 ounces (7 CFR 226.20(a)(4)(ii) and 226.20(a)(5)(iii)(B)).

The Final Rule modifies this requirement and changes product-based limits for breakfast cereals and yogurt from total sugars to added sugars, consistent with the NSLP and SBP product-based added

sugars limits. The specifics regarding these changes are below:

- Breakfast cereals must contain no more than 6 grams of added sugars per dry ounce (7 CFR 226.20(a)(4)(ii)).
- Yogurt must contain no more than 12 grams of added sugars per 6 ounces (2 grams of added sugars per ounce) (7 CFR 226.20(a)(5)(iii)(B)).

To support cross-program alignment, CACFP operators may use any State's WIC list to identify breakfast cereals and yogurts that may be offered in CACFP.

### **Implementation Date**

The implementation date for this rule change is October 1, 2025; however, with State Agency approval, CACFP operators may choose to implement the added sugars limits for breakfast cereals and yogurt early.

## **Meal Modifications and Registered Dietitians**

Under current CACFP regulations, substitutions for disability reasons must be supported by a written statement signed by a licensed physician or licensed healthcare professional who is authorized by State law to write medical prescriptions (7 CFR 226.20(g)(1)(i)).

The Final Rule outlines in regulation that State licensed healthcare professionals and registered dietitians may write medical statements to request meal modifications on behalf of participants with disabilities in the CACFP; and defines a State licensed healthcare professional as an individual authorized to write medical prescriptions under State law (7 CFR 226.20(g)).

In addition, the Final Rule encourages CACFP institutions and facilities to meet participants' non-disability dietary preferences when planning and preparing CACFP meals (7 CFR 226.20(g)).

### **Implementation Date**

The implementation date to accept medical statements from registered dietitians is October 1, 2025.

## **Fluid Milk Substitutes: Nutrient Requirements and Units of Measurement**

Non-dairy beverages (fluid milk substitutes) must be nutritionally equivalent to milk and meet the nutritional standards for fortification of calcium, protein, vitamin A, vitamin D, and other nutrients to levels found in cow's milk. Vitamin A and vitamin D requirements are currently specified in International Units (IUs) (226.20(g)(3)).

The Final Rule 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 (226.20(g)(3)(ii)) as described below:

- For vitamin A, instead of 500 IUs, the unit requirement is now 150 mcg retinol activity equivalents (RAE) per 8 fl oz.
- For vitamin D, instead of 100 IUs, the unit requirement is now 2.5 mcg per 8 fl oz.

Below is a chart of the nutrient standards for non-dairy beverages:

| Nutrient         | Per cup (8 fl oz) |
|------------------|-------------------|
| Calcium          | 276 mg.           |
| Protein          | 8 g.              |
| <b>Vitamin A</b> | <b>150 mcg.</b>   |
| <b>Vitamin D</b> | <b>2.5 mcg.</b>   |
| Magnesium        | 24 mg.            |
| Phosphorus       | 222 mg.           |
| Potassium        | 349 mg.           |
| Riboflavin       | 0.44 mg.          |
| Vitamin B-12     | 1.1 mcg.          |

**Please note:** 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.

### **Implementation Date**

The implementation date for this rule change is July 1, 2024; however, no changes to menus or operations are required as a result of this change.

### **Whole Grain Rich Definition**

The Final Rule adds the following definition for "whole grain-rich" in CACFP regulations (7 CFR 226.2).

*Whole grain-rich is the term designated by FNS to indicate that the grain content of a product is between 50 and 100 percent whole grain with any remaining grains being enriched.*

This definition does not change the meaning of whole grain-rich, and program operators can continue to identify whole grain-rich products as described in current guidance.

### **Implementation Date**

The implementation date for this rule change is July 1, 2024; however, CACFP is only impacted by the addition of the whole grain-rich definition to regulations. CACFP operators are not required to change menus or operations as a result of this provision.

## **CACFP and SFSP Program Requirements**

### **Nuts and Seeds Credited for Full Meats/Meat Alternates Components**

Prior, nut and seed crediting was limited to 50 percent of the meats/meat alternates component. Program operators choosing to serve nuts and seeds were to serve them alongside another meat/meat alternate to fully meet the component requirement (7 CFR 225.16(d)(2), 225.16(e)(5), 226.20(a)(5)(ii), and 226.20(c)(2)).

The Final Rule allows nuts and seeds to credit for the full meats/meat alternates component in all CACFP and SFSP meals and snacks, removing the 50 percent crediting limit for nuts and seeds at breakfast, lunch, and supper (7 CFR 225.16(d)(2), 225.16(e)(5), and 226.20(a)(5)(ii)).

### **Implementation Date**

The implementation date for this rule change is July 1, 2024; however, this rule only provides menu planning flexibility. CACFP and SFSP operators are not required to change menus or operations as a result of this provision.

### **Substituting Vegetables for Grains in Tribal Communities**

The Final Rule allows for CACFP institutions and facilities and SFSP sponsors that serve primarily American Indian or Alaska Native children the option to substitute vegetables for grains (7 CFR 225.16(f)(3) and 226.20(f)). In addition, the Final Rule allows CACFP and SFSP operators in Guam and Hawaii to serve vegetables to meet the grains or breads requirement.

### **Implementation Date**

The implementation date for this rule change is July 1, 2024; however, this rule only provides menu planning flexibility. CACFP and SFSP operators are not required to change menus or operations as a result of this provision.

## **Comments**

For questions concerning this memorandum, please contact the Policy Administrator at (404) 651-8193.