MASSACHUSETTS
Department of Elementary and Secondary Education
Pedro Martinez | Commissioner

August 4, 2025

Representative Andres X. Vargas
Massachusetts House of Representatives
24 Beacon Street, Room 26
Boston, MA 02133

Senator Jason Lewis
Massachusetts Senate
24 Beacon Street, Room 511-B
Boston, MA 02133

Dear Representative Vargas and Senator Lewis,

Enclosed with this letter is the report of the Massachusetts School Meal Nutrition Standards, established under Section 77 of Chapter 28 of the Acts of 2023.

Sincerely,

Pedro Martinez
Commissioner of Massachusetts
Department of Elementary and
Secondary Education
135 Santilli Highway
Everett, MA 02149

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Commissioner of Massachusetts
Department of Public Health
250 Washington Street
Boston, MA 02108

OFFICE FOR FOOD AND NUTRITION PROGRAMS
Fueling the Commonwealth

School Meal Nutrition Standards Commission Report

Established in Section 77 of Chapter 28 of the Acts of 2023

COMMONWEALTH OF MASSACHUSETTS
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Commission Members

- Co-Chairs:
  - Rachel Colchamiro, Director, Nutrition Division and Massachusetts WIC Nutrition Program, Department of Public Health
  - Robert Leshin, Director, Office for Food and Nutrition Programs, Department of Elementary and Secondary Education
- Legislative Representatives:
  - Senator Jason Lewis
  - Representative Andy Vargas
- Governor Appointees:
  - Juliana Cohen, Adjunct Professor of Nutrition, Harvard T.H. Chan School of Public Health, Director, Center for Health Innovation, Research, and Policy (CHIRP), Merrimack College
  - Jessie Curran, Sustainability and Wellness Manager, Sodexo
  - Aminah Herzig, School Programs Manager, Healthy Chelsea
  - Wendy Ng, Director of Food Services, Gloucester Public Schools
  - Sasha Palmer, Director of Food Services, Public Schools of Brookline
  - Kumara Sidhartha, Chief Health Equity and Wellness Officer, Cape Cod Healthcare
- Advocates:
  - Beth-Anne Farrow, MA Healthy School Lunch Coalition
  - Sam Icklan, Director of Community Nutrition Services, Project Bread
  - Sarah Littmann, Representative of the School Nutrition Association of Massachusetts

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Commission Overview

The Commission was further charged with making recommendations on the feasibility of implementing measures to increase the nutrition of school foods, including, but not limited to:

A. “enhancing standards for food served at schools in the commonwealth, including, but not limited to, the sugar content, dietary fiber content, limits of saturated fat and cholesterol in and ultra-processing of products;

B. providing clearly-labeled daily vegetarian or vegan options;

C. accommodating religious, cultural, medical and non-medical dietary restrictions, including, but not limited to, food allergies and lactose intolerance; and

D. requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed.”

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Commission Overview

The Commission met four times from November 2024 through March 2025. All meetings were subject to the Open Meeting Law and minutes were taken and approved for each meeting. Copies of all minutes approved by the Commission are posted on DPH's School Health Services web page.

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Commission Meeting 1

Commission Meeting #1

Meeting Date/Location	Commission Charge:	Agenda Items from Meeting:
November 20, 2024 Remote Meeting	Commission will review current and proposed federal standards, current K-12 school nutrition standards in the commonwealth, and nutrition standards determined to prevent chronic disease and optimize the short-term and long-term health of children.	Rob Leshin and Denise Courtney presented on the following: • Organizational structure and administration of the national school lunch program • The state of school meal nutrition standards and meals served in Massachusetts schools • Opportunities for Growth in School Meal Programs After the presentation, Rachel Colchamiro facilitated questions and comments from the commission.

Organizational Structure and Administration of the National School Lunch Program

Overview: Administration of School Meal Programs

- The administration of school meal programs involves a collaborative effort between federal, state, and local agencies to ensure that children receive nutritious meals during the school day.
- These programs are primarily funded and regulated by the U.S. Department of Agriculture (USDA); however, local educational agencies (LEAs) are responsible for implementing the programs at the school and/or district level.
- USDA's Food and Nutrition Services supports states implementing the regulations.
- In Massachusetts:
  - Department of Elementary and Secondary Education (DESE) Office for Food and Nutrition Programs (FNP) oversees compliance with school meal regulations.
  - Department of Public Health (DPH) oversees compliance with competitive foods and beverages in schools (G.L. c. 111, s. 223).

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Federal Agency: USDA

USDA sets the guidelines for the National School Lunch Program (NSLP) and School Breakfast Program (SBP). These regulations define meal requirements, eligibility criteria, and standards for nutrition, food safety, and quality.

- **Funding:** The USDA provides funding to states based on the number of meals served to eligible children. This funding covers part of the cost of the meals, and schools must meet certain eligibility and participation requirements to receive these federal funds.
- **Nutrition Standards:** USDA ensures that meals served through the school meal programs meet specific nutrition standards, food portion sizes, and calorie limits to provide children with balanced meals.
- **Monitoring and Compliance:** USDA, through the Food and Nutrition Service (FNS), conducts audits, reviews, and compliance checks to ensure schools are following the federal regulations and maintaining food safety and quality standards.

State Agency: Office for Food and Nutrition Programs

DESE's Office for Food and Nutrition Programs (FNP) oversees the administration of the National School Lunch Program within the Commonwealth. FNP works closely with schools to ensure the child nutrition programs are operating according to USDA guidelines.

- **Allocating Federal Funds**: States distribute federal meal reimbursements to school districts based on the number of eligible meals served. These funds help cover the cost of meal preparation, staffing, and supplies.
- **Training and Technical Assistance**: FNP provides training for school nutrition professionals, business managers, administrators, and other stakeholders to ensure proper implementation of school meal programs.
- **Monitoring and Auditing**: FNP is responsible for conducting periodic audits and reviews of school meal programs to verify compliance with federal regulations.

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Fueling the Commonwealth: School Meals in Massachusetts

- MA is only **1 of 8 states** supporting universal free school meals with state funding.
  - As a result, school breakfast and lunch participation is at an all-time high in the state.
- 61,500 more students are eating lunch every school day.
- 12 million more lunches and 9 million more breakfasts are being served annually compared to School Year 2018-2019.
- Nutrition is an essential component in supporting the whole student, as outlined in DESE's Educational Vision, Strategic Objective 1:
  - DESE partners with districts, schools, and programs to cultivate systems to support the whole student and foster joyful, healthy, and supportive learning environments so that all students feel valued, connected, **nourished**, and ready to learn.

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Charge (i): Review current federal nutrition standards and the updates proposed on February 7, 2023 to 7 CFR Parts 210, 215, 220, 225 and 226 by the United States Department of Agriculture

Current Federal Nutrition Standards

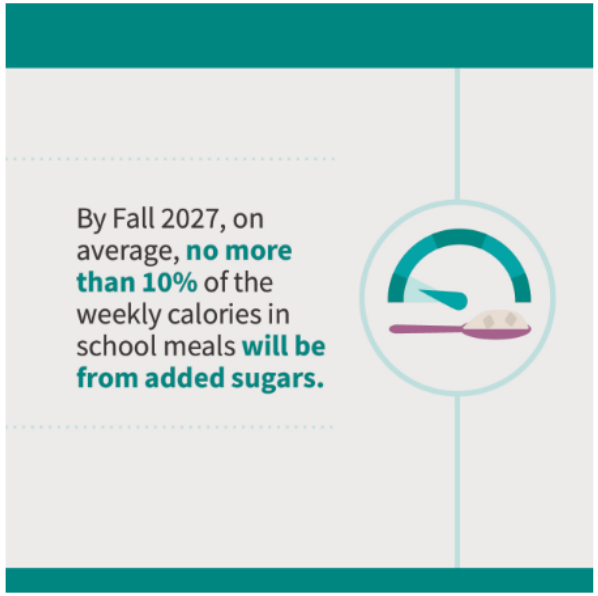
- The NSLP meal pattern includes five required components for each meal:
  - Fruits
    - No more than half of the fruit or vegetable offerings may be juice, and all juice must be 100% full-strength.
  - Vegetables are broken down into subgroups:
    - Dark green
    - Red/Orange
    - Beans, peas and lentils
    - Starchy
    - Other vegetables (for the purposes of the NSLP, the "Other vegetables" requirement may be met with any additional amounts from the dark green, red/orange, and bean, peas, and lentils vegetable subgroups).
  - Meat or Meat Alternate
  - Grains
    - At least 80% of grains offered weekly must be whole-grain rich.
  - Milk
    - All fluid milk must be fat-free or low-fat.

Current Federal Nutrition Standards

- NSLP meal pattern also limits calories based on the age of children being served to ensure proper portion size and increase the focus on reducing the amounts of saturated fat, trans fats, added sugars, and sodium.
  - According to the U.S. Food and Drug Administration (FDA), "Added sugars include sugars that are added during the processing of foods (such as sucrose or dextrose), foods packaged as sweeteners (such as table sugar), sugars from syrups and honey, and sugars from concentrated fruit or vegetable juices. They do not include naturally occurring sugars that are found in milk, fruits, and vegetables."
- Nutrition Standards are always evolving and take into consideration what is best for the whole child.
- USDA studies current scientific research and seeks public feedback when updating school meal standards.

Updates to Federal School Nutrition Standards: Added Sugars

Starting in school year 2025-26 (July 1, 2025), there will be a limit on the amount of added sugars allowed for specific foods. [Updated School Nutrition Standards for Added Sugars.]



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Updates to School Nutrition Standards: Milk

- Flavored milk (fat-free and low-fat) may still be offered in all K-12 schools. Limits on added sugars for flavored milk must be implemented by school year 2025-26 (July 1, 2025).
- Updated School Nutrition Standards for Milk

Updates to School Nutrition Standards: Whole Grains

- There are no changes to whole grains nutrition requirements for school meals. Schools will continue to ensure that 80% of the weekly grains offered in the school meal programs are whole grain rich.
- Updated School Nutrition Standards for Whole Grains

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Updates to School Nutrition Standards: Sodium

- Based on public input, schools will have several years to gradually reduce sodium from current limits. USDA outlines the following updates:
  - For the next three school years, through school year 2026-27 (until June 30, 2027), schools will maintain current sodium limits (Sodium Target 1A for lunch and Sodium Target 1 for breakfast).
  - By school year 2027-28 (beginning July 1, 2027), schools will implement an approximate 15% reduction for lunch and an approximate 10% reduction for breakfast from current sodium limits.

National School Lunch Program Sodium Limits

Age/Grade Group	Current Sodium Limit: In place through June 30, 2027	Sodium Limit: Must be implemented by July 1, 2027
Grades K-5	≤ 1,110 mg	≤ 935 mg
Grades 6-8	≤ 1,225 mg	≤ 1,035 mg
Grades 9-12	≤ 1,280 mg	≤ 1,080 mg

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Charge (ii): current nutrition standards or guidelines used by K-12 schools in the commonwealth

Current Nutrition Standards

- Eating school meals is associated with healthier dietary intakes.[1]
- Children who ate school breakfast every day compared to children who ate 0–4 days/week, reported consuming **more fruits/vegetables, dietary fiber, whole grains, dairy, and calcium**.
- Children who ate school lunch every day compared to those who ate less frequently, consumed **more dairy and calcium**.
- No significant associations were observed between school meal consumption and energy-dense nutrient-poor foods or added sugars.

7 out of 10 MA students selected the healthiest meal available to children.

School meals are nutritious.[2,3] Research shows that students who participate in the school meal programs consume more whole grains, milk, fruits, and vegetables during meal times and have better overall diet quality, than nonparticipants.[2,4] And, eating breakfast at school is associated with better attendance rates, fewer missed school days, and better test scores.[5–8] Meals served through these programs must meet specific nutrition requirements which include fruit, vegetables, and whole grains.

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Culinary Advancements in the Commonwealth

- Federal limitations on sodium and saturated fat have increased scratch meal preparation. Culinary training available through school nutrition partners Project Bread and the John C. Stalker Institute at Framingham State University have supported this transition.
- In SY23-24, MA launched “Terrific Trays,” an initiative in which schools submit pictures of their meals along with recipes that highlight locally grown ingredients.

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Meal Accommodations in the Commonwealth

- Modifications within the Meal Pattern: If a meal modification for a child's disability can be made within the meal pattern, a medical statement is not necessary, and the Program Operator is not required to obtain a medical statement.

- Modifications Outside of the Meal Pattern: Meal modifications outside the meal pattern are reimbursable, with an IEP, 504, or medical statement that includes only:
  - Information about the child's physical or mental impairment that is sufficient to allow the Program Operator/SFA to understand how it restricts the child's diet,
  - An explanation of what must be done to accommodate the child's disability, and
  - The food or foods to be omitted and recommended alternatives in the case of a modified meal.

- Information is made available to students and parents on food allergies and gluten-free procedures; informed by a collaboration with DESE, Boston Children's Hospital, and the Celiac Disease Foundation.

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Fueling the Commonwealth's Future

Research evidence[9] supports the following strategies to increase school meal consumption:

1. offering students more menu choices;
2. adapting recipes to improve the palatability and/or cultural appropriateness of foods;
3. providing pre-sliced fruits;
4. rewarding students who try fruits and vegetables;
5. enabling students to have sufficient time to eat with longer (about 30 minutes) lunch periods;
6. having recess before lunch; and
7. limiting students' access to competitive foods during the school day.

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Opportunities for Growth in the Commonwealth

1. **Seat time:** Currently there is no state minimum time for lunch. Students can have less than 30 minutes for lunch time (anywhere from 15-25 minutes). This timeframe includes travel to and from the classroom and standing in line to receive lunch.
2. **Consumption:** Balancing varied student needs and preferences with general nutrition recommendations and operational limitations.
3. **Adequate Staffing:** Recruitment and retention.
4. **Capital Investments:** Renovations to kitchens and serving lines to support scratch cooking/speed of scratch cooking.
5. **Training:** Culinary training for frontline staff.

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Opportunities for Growth in the Commonwealth

6. **Improved communication:** With parents about availability of dietary accommodations and food safety practices.
7. **Expanded awareness of the need for Kosher/Halal meals:** Viable Kosher and Halal vended meal options. Administrative and staff training on Kosher/Halal diets and safe food production.
8. **Lack of standardization:** In the supply chain of how sourcing information is communicated/recorded. For example, most invoices do not list point of origin for each item.
9. **Support procurement process:** For schools and farms.
10. **Expand vegetarian, vegan choices and lactose-free choices.** Accommodations for students with lactose intolerance, ensuring culturally inclusive and nutritionally appropriate meals for all students.

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Facilitated Discussion Points

Commission members identified the following key considerations when assessing the school nutrition environment at the end of the first commission meeting:

- Individual school capacity
- Supporting schools for success
- Consideration of dietary fiber
- Consideration of milk and vegetarian options to meet dietary needs and cultural/religious preferences
- Importance of sufficient seat time
- Timing of recess
- Need to promote workforce development and retention
- Need to align recommendations with health equity efforts
- Consideration of how existing efforts and policies are meeting needs
- Consideration of any unintended consequences of recommendations

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Charge (iii): nutrition requirements or best practices of states with enhanced standards beyond federal requirements

Texas - Implemented in 2007 before Healthy, Hunger-Free Kids Act (HHFKA)

"The following specific nutrition standards pertain to all foods and beverages served or made available in reimbursable school meals, a la carte and competitive foods to students on high school campuses.

1. Fats and Fried Foods:

    a) Schools and other vendors may not serve individual food items that contain more than 23 grams of fat with an exception of one individual food item per week. No individual food items can exceed 28 grams of fat at any time. This excludes peanut butter when served as part of a reimbursable meal.

    b) Schools must eliminate deep-fat frying as a method of on-site preparation for foods served as part of reimbursable school meals, a la carte, snack lines and competitive foods. For the definition of fried foods see Section II. This standard is effective immediately. Schools that must make extensive equipment or facility changes must be in compliance by the 2009-10 school year.

    c) Foods that have been pre-fried, flash-fried or par-fried by the manufacturer may be served but must be baked or heated by a method other than deep fat frying.

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Texas - Implemented in 2007 before HHFKA

1. Fats and Fried Foods: (Continued)

d) Potato products

- a. French fries and other fried potato products that have been pre-fried, flash-fried or par-fried by the manufacturer may be served but must be baked or heated by a method other than deep-fat frying. Servings must not exceed 3 ounces, and students may only purchase one serving at a time. (This does not pertain to potato chips, which are mentioned specifically in “2. Portion Sizes” below.)
- b. Baked potato products (wedges, slices, whole, new potatoes) that are produced from raw potatoes and have not been pre-fried, flash-fried or par-fried in any way may be served without restriction.

e) Schools must include a request for trans fat information in all product specifications. Beginning with the 2007-08 school year, schools must reduce the purchase of any products containing trans fats. (Federal labeling of trans fats on all food products was required by January 1, 2006.)

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California - Implemented in SY 23/24

- Limits food dyes in both reimbursable meals and competitive foods, specifically: (A) Blue 1 (CAS 3844-45-9). (B) Blue 2 (CAS 860-22-0). (C) Green 3 (CAS 2353-45-9). (D) Red 40 (CAS 25956-17-6). (E) Yellow 5 (CAS 1934-21-0). (F) Yellow 6 (CAS 2783-94-0).
- Codifies the new federal limits on sugar and sodium: "If the federal School Breakfast Program and federal National School Lunch Program allow more added sugar or sodium than is recommended by the most recent Dietary Guidelines for Americans, established by the United States Department of Agriculture and the United States Department of Health and Human Services, the State Department of Education shall convene representatives from the California School Nutrition Association and cafeteria workers, or their representatives, to work in partnership to provide the following:
  - Maximum daily added sugar intake recommendations for each grade level commensurate with the American Academy of Pediatrics' standards for children two years of age or older.
  - Maximum daily added sodium intake recommendations for each grade level commensurate with recommendations for children and adolescents in the Dietary Guidelines for Americans.

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West Virginia – Implemented March 2025

- West Virginia passed House Bill 2354 into law, which prohibits certain harmful food dyes in school lunches and unhealthy food items for sale in West Virginia.

Charge (iv) nutrition standards determined to prevent chronic disease and optimize the short-term and long-term health of children in the commonwealth

Meal Patterns are driven by most current Dietary Guidelines for Americans

The National School Lunch Program (NSLP) meal pattern is determined by the USDA and is based on the Dietary Guidelines for Americans (DGA). The DGA's purpose is:

- Promoting Health and Preventing Disease:
  - The guidelines aim to help individuals make informed food and beverage choices to improve overall health and reduce the risk of chronic diseases like heart disease, type 2 diabetes, and certain cancers.
- Meeting Nutrient Needs:
  - The guidelines emphasize the importance of consuming a variety of nutrient-rich foods to ensure individuals meet their daily nutritional requirements at every stage of life.

Charge: Making recommendations on the feasibility of implementing measures to increase the nutrition of school foods

Commission Meeting 2

Commission Meeting #2

Meeting Date/Location	Commission Charge	Agenda Items from Meeting:
January 22, 2025 Remote Meeting	Commission will make recommendations on the feasibility of implementing measures to increase the nutrition of school foods, including, but not limited to: (A) enhancing standards for food served at schools in the commonwealth, including, but not limited to, the sugar content, dietary fiber content, limits of saturated fat and cholesterol in and ultra-processing of products; (B) providing clearly-labeled daily vegetarian or vegan options; (C) accommodating religious, cultural, medical and non-medical dietary restrictions, including, but not limited to, food allergies and lactose intolerance; and (D) requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed	Commission members had an open discussion on the feasibility of implementing measures A-D as outlined St. 2023, c. 28, § 77

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Topic A: Enhancing Standards for food served at schools in the Commonwealth

Commission members discussed the following related to saturated fats:

- The New 2025 Dietary Guidelines are focusing on decreasing saturated fats. The USDA Guidelines already limit saturated fat in school meals (saturated fat must be <10% of total calories/day).
  - Most saturated fats on school meal menus come from animal proteins (cheese, dairy, beef, chicken).
- A Research study[10] was shared with the commission that analyzed the current levels in school meals and lunch, which are, on average, 6 grams of saturated fat (approximately 9% of calories).
- A School Nutrition Director noted that with the current standards, restricting saturated fat to less than the federal limit of <10% of total calories over the course of a week would be very difficult to implement; for example, with current guidelines, a program can only serve a beef burger once per week. When planning a menu, food service directors must plan items that meet the current guidelines, consider allergies, and what students want to eat.

Topic A: Enhancing Standards for food served at schools in the Commonwealth

Commission members discussed the following related to fiber:

Current research shows that school lunches have, on average, 7.8 grams of fiber and 3.4 grams of fiber at school breakfast.[11]

- Chicago Public Schools specify fiber in their meals
  - 3 grams at breakfast and 7 grams at lunch.
- School Nutrition Programs are required to offer a legume at least once per week.
  - Based on student preference, some schools offer legumes more frequently.
  - Increased training on scratch cooking leads to increasing menu options.

Fiber and School Breakfast

Section 1C of Chapter 69 of the Massachusetts General Laws requires all schools with 60% or more free and reduced price eligibility to offer breakfast "after the instructional day has begun and the tardy bell rings."

The Breakfast After the Bell language was also included in Massachusetts General Law - Part I, Title XII, Chapter 69, Section 1C. Specifically, the language states that "All public schools required to serve breakfast under subsection (b) and where not less than 60 per cent of the students at the school are eligible for free or reduced-price meals under the National School Lunch Program, as determined by the department, shall offer all students a school breakfast after the beginning of the instructional day."

Requiring breakfast leads to increased options for whole foods and whole fruits at breakfast, also increasing fiber intake for students.

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Topic A: Enhancing Standards for food served at schools in the Commonwealth (Fiber)

NSLP school meal pattern has components that must be offered (two of those components are fruit/vegetables) and are the best sources of dietary fiber.

- Students are required to take a fruit or vegetable at lunch or it's not free.
- 2 oz. of grains (additional component) are offered
  - 80% of grains must be whole grains
- Research shows that once a child has fruit on their tray, they eat, on average, half of it. There are often concerns that students throw fruit away untouched, which of course sometimes happens as with any food item. The fruit requirement has led to more children eating half a fruit.[12]
- USDA's Fresh Fruit and Vegetable Program (FFVP) introduces new foods to students and provides nutrition education. A school nutrition director shared that since starting the FFVP Program in 2019, there has been a significant increase in fruit and vegetable intake amongst their students.

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Topic A: Enhancing Standards for food served at schools in the Commonwealth (Fiber)

Barriers:

- Commission members discussed “unintended consequences” when focusing on a single nutrient versus a whole food approach. For example, if the focus is specifically on fiber (versus sources such as; whole grains, fruits, and vegetables), then a product reformulation is created with fiber added to meet the regulation. A reformulated product may not have the same benefits as getting fiber from whole foods.
- A school nutrition director noted that it is difficult to make a recommendation on grams of fiber when students can choose their options, and therefore, fiber intake varies amongst students.

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Topic A: Enhancing Standards for food served at schools in the Commonwealth

Commission members discussed the following related to added sugars:

- Starting next year, federal standards will be implemented to reduce sugar in milk, yogurt, and cereal.
- Commission suggests Massachusetts to be at the forefront of limiting non-nutritive sweeteners. Members are concerned about increased artificial sweeteners as an unintended consequence of enhanced federal sugar limitations.
- From a medical standpoint it is important for schools to consider the sugar-to-fiber ratio of a product.

Barriers: Industry will be reformulating their products to meet federal limits to added sugars. They may replace added sugars with non-nutritive sweeteners to maintain the sweet taste. If K-12 products begin to increase the use of non-nutritive sweeteners it may reduce the market availability of processed products that MA schools want to use, requiring increased training, labor and kitchen capacity to scratch prepare products.

Topic A: Enhancing Standards for food served at schools in the Commonwealth

While there was general agreement that whole foods should be prioritized, the Commission members did not make additional specific recommendations about ultra processed foods (UPF). They discussed that Universal Free School Meals schools have increased capacity to receive and prepare meals with minimally processed ingredients. Discussion was focused on promoting the procurement and service of whole foods, specifically produce, bean, peas, and lentils.

We anticipate that additional guidance regarding UPF will be released in future versions of the DGA. Given meal patterns are recommendations of food served based on the DGA's age specific recommendations, this guidance from the DGA will be important to consider when issued.

Topic B: Providing Clearly labeled vegan or vegetarian options

Key discussion points:

- School nutrition directors noted that from a cost perspective, state and federal funds don't cover expenses, limiting the feasibility. It is difficult to source predominately plant-based items with current procurement guidelines.
- Commission discussed current best practices when offering vegan/vegetarian items:
  - Student-led movements are very helpful. For example, peer-to-peer surveys ask what vegetarian, and vegan options students want and why.
    - Students can also note allergies and cultural preferences for menu items.
  - Schools can offer "pop-up" menu items, allowing students to try dishes before putting them on the menu.
  - Customizable dishes are best practices; however, they take additional time during the line. Without expanded time for lunch these types of build-your-own meals are not feasible.
- Brookline Public Schools has pledged to make 50% of meals be plant-based meals.
  - Currently, 46% are plant-based – this is something the students requested and was driven by students. Their local wellness policy and sustainability policy outlines vegan options.
  - Additional support is needed for this to be feasible for all programs in the Commonwealth. Brookline partners with the Humane Society, which helps with training, menus, and recipes and provides a chef.

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Topic B: Providing Clearly labeled vegan or vegetarian options

Barriers: Processed gluten free and vegan alternatives are often not nutritionally equivalent and may not credit towards a reimbursable meal. Additionally, these products are difficult to procure (expensive and unavailable for consistent purchase). Additional training for staff and school nutrition directors related to menu and recipe development is needed to make this more feasible.

Topic C: Accommodating religious, cultural, medical, and non-medical dietary restrictions

Key Discussion Points:

- This isn't a one-size-fits-all model. It is imperative to understand specific students and environments.
- Communication between families, school nurses, and school nutrition departments is critical. Local wellness policies can help leverage these conversations.
- School Nutrition Directors noted procurement challenges and finding reliable, accessible vendors for products. The main concerns are the feasibility of procurement of these items, but also, in nut-free kitchens, cannot offer almond or coconut milk.
- Commission agreed that final recommendation should consider how to make these options equitable, safe, and accessible for students.

Barriers: School nutrition directors noted that non-dairy and lactose-free items are difficult to procure due to limited product availability and poor quality of products. Nut-free kitchens also limit alternative milk options.

Topic D: Requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed

- School Nutrition Programs are required to use produce grown in the US. Many programs label local produce on menus and serving lines.
- School Nutrition Directors noted the importance of supporting the farm-to-school movement. Massachusetts Farm to School is a strong partner and provides support and technical assistance to schools with the procurement of local products.
    - Best Practice: Brookline Public Schools uses a 250-mile radius for local foods and are also investing in hyperlocal, growing some of their own items used in recipes.

Barrier: Navigating state and federal procurement processes to properly procure local produce takes skilled labor that is not available to all districts. Recently these efforts have been supported by grant funding.

Topic D: Requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed

Providing transparency on a food's nutrition content and where it comes from helps build trust amongst families and helps them make informed decisions.

Many districts use digital menu tools that allow for menus and nutrition information to be publicly available, however, they are expensive:

- School Nutrition Director noted using a software costing $10,000 per year
- School Nutrition Director noted using a software costing $18,000 per year
- School Nutrition Director noted using a software costing $30,000 per year and software includes a website and interactive menu that allows parents to filter meal accommodations

Barrier: There is limited feasibility for small to medium size districts to purchase software and maintain this information as products and formulations change due to the software's cost and the skilled labor needed to properly calculate and communicate this detailed nutrition information.

Additional Topic Discussion: Seat Time

Commission members agreed to prioritizing a discussion on seat time. Key points from discussion:

Lunches consumed from school are the most nutritious. Students need ample time to enjoy this meal. As outlined in the Universal Free School Meals Report:

The 2022-23 school year was the first for state-supported universal free school meals, and compared to the 2018-19 school year:

- 12.2 million more lunches were served
- 61,500 more students ate lunch every school day
- 9 million more breakfasts were served
- 43,400 more students ate breakfast every school day

Additional Topic Discussion: Seat Time

School meal participation in Massachusetts has increased significantly; however, facilities have remained the same. The cafeteria is the largest classroom in the school district, and additional seat time for students to consume meals is critical.

- There are currently 27 states that address Time to Eat policies around school lunch
- Amount of Time to Eat Lunch is Associated with Children's Selection and Consumption[13]
  - Students were significantly less likely to choose a fruit for their tray if they had <20 min to eat lunch
  - Students who had <20 minutes for lunch ate 13% less of their entree, 10% less of their milk, and 12% less vegetables compared to students who had >20 minutes to eat

Barriers: The time that students spend in line for lunch has increased and time on lunch is not addressed in any state statutes or regulations leaving some students without enough time to consume the meal. Many facilities were not built to prepare meals from minimally processed ingredients and serving lines are designed to accommodate lower participation prior to Universal Free School Meals. These structural limitations can make serving more complex meals to more student challenging to many districts without capital investments.

Additional Topic Discussion: Recess Prior to Lunch

Commission members agreed to prioritizing a discussion on seat time. Key points from discussion:

- Research shows that recess before lunch is important and gives students the opportunity to burn off energy.
- Recess before lunch also allows staff more time to scratch cook and prepare more options.
- American Academy of Pediatrics Policy Statement[14] notes the Crucial Role of Recess before Lunch (RBL):
  - RBL leads to more time for eating which leads to less food being wasted
  - RBL improves student behavior at mealtime and in the classroom

Facilitated Discussion Points

Commission members identified the following key considerations when assessing the school nutrition environment at the end of the second commission meeting:

- School nutrition directors want to offer as many options as possible, and additional training and support is needed, especially around beans and legumes. These are low-cost, easy to prep, and recognizable food options.
- School nutrition professionals are often moms/caregivers re-entering the workforce. Scratch cooking training is necessary to increase menu options.
- A commission member suggested increasing documentation when operating the FFVP program, recording which classrooms are receiving FFVP, and looking at the nutritional analysis; that helps to increase the overall amount of fiber offered.

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Commission Feasibility Recommendations

Commission Meeting #3

Meeting Date/Location	Commission Charge	Agenda Items from Meeting:
February 5, 2025 Remote Meeting	Commission will make recommendations on the feasibility of implementing measures to increase the nutrition of school foods, including, but not limited to: (A) enhancing standards for food served at schools in the commonwealth, including, but not limited to, the sugar content, dietary fiber content, limits of saturated fat and cholesterol in and ultra-processing of products; (B) providing clearly-labeled daily vegetarian or vegan options; (C) accommodating religious, cultural, medical and non-medical dietary restrictions, including, but not limited to, food allergies and lactose intolerance; and (D) requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed	The Commission voted on final recommendations and came to a consensus for each recommendation outlined in this report.

Commission Recommendations

- Prior to the February 5, 2025 meeting, Commission members received a draft of feasibility recommendations to implement the various measures to improve the nutrition standards of school meals.
- The Commission voted on final recommendations and came to consensus for each recommendation outlined in this report.
- The Commission presents the following on the feasibility of implementing measures to increase the nutrition of school foods to the Massachusetts Legislature:

Feasibility Scale

- School Nutrition Programs have different levels of feasibility and there is a wide range in how they operate. Examples:
  - There are high-level operators with skilled culinary staff, and large kitchen spaces to receive unprocessed ingredients and make food from scratch.
  - There is another level of small, rural, charter or parochial schools, where it can be very hard to find vendors to deliver to the location or in the small quantities.
    - Some programs don't have kitchens in their buildings, and they need to contract with a vendors that can bring pre-prepared meals into the schools. These schools also may need to rely heavily on processed products.
- Therefore, the Commission structured the recommendations as either broadly, moderately or limited as it relates to statewide feasibility.

Topic A: Enhancing standards for food served at schools in the commonwealth, including, but not limited to, the sugar content, dietary fiber content, limits of saturated fat and cholesterol in and ultra-processing of products;

- **Broadly feasible:** Continue to prioritize state resources and technical assistance available to School Food Authorities to support menu planning and culinary preparation using whole foods, including but not limited to increased beans, peas, and lentils. Offering beans, peas, and lentils beyond the current minimal federal requirements of once per week with the goal of three or more times per week.
- **Moderately feasible:** Limit offering foods and beverages that contain non-nutritive sweeteners in reimbursable meals.
- **Limited feasibility:** Select stricter dietary specifications around saturated fat beyond the current maximum federal requirements of 10 % of calories over the course of a week.

Topic A: Enhancing standards for food served at schools in the commonwealth, including, but not limited to, the sugar content, dietary fiber content, limits of saturated fat and cholesterol in and ultra-processing of products;

Barriers include:

- *Difficult procurement processes and sometimes inconsistent availability of products (specifically non-dairy items).*
- *Finding high-quality products and quantity of products (specifically lactose-free products)*
- *Increasing costs of products.*
- *Student acceptance of meals. Additional staff is needed to help engage with students and provide education when offering new meals.*
- *Cost and availability of nutrient analysis software.*
- *Continued and expanded training is needed for staff and school nutrition directors.*
- *Continued investment in infrastructure of school cafeterias is needed (considering schools without kitchens that must contract with vendors to provide meals).*

Topic B: Providing clearly labeled daily vegetarian or vegan options

- **Broadly feasible:** Clearly label and promote vegetarian and vegan entrees and prepared sides served.
- **Moderately feasible:** Collect and review local data (student surveys, racial and ethnic data, parent feedback) to identify demand for vegetarian and vegan meals. Consider ways to increase frequency accordingly.
- **Limited feasibility:** Offer vegetarian or vegan meals daily. Focus on adapting the main entrée to be a vegetarian or vegan equivalent.
- *Barriers include:*
  - *Difficult procurement processes and sometimes inconsistent availability of products (specifically non-dairy items).*
  - *Student acceptance of meals. Additional staff is needed to help engage with students and provide education when offering new meals.*
  - *Continued investment in infrastructure of school cafeterias is needed (considering schools without kitchens that must contract with vendors to provide meals).*

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Topic C: Accommodating religious, cultural, medical, and non-medical dietary restrictions

- **Broadly feasible:** Expand communication and information available to students and families requesting and receiving meal modifications. Increase the variety of modified meals, adapting a close equivalent to the main entrée.
- **Moderately feasible:** Provide lactose-free and/or dairy-free nutritionally equivalent fluid milk alternatives 7 CFR § 210.10(d)(2) for students to select independently.
- **Limited feasibility:** Collect and review local data (student surveys, racial and ethnic data, parent feedback) to identify demand for culturally relevant, religious, and nonmedical dietary restrictions. Meet identified demand as able.
- *Barriers include:*
  - *Difficult procurement processes and sometimes inconsistent availability of products (specifically non-dairy items).*
  - *Finding high-quality products and quantity of products (specifically lactose-free products).*
  - *Continued and expanded training is needed for staff and school nutrition directors.*

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Topic D: Requiring food service providers to provide information to schools on the nutritional content of menu items and the location where the purchased produce is grown and processed

- **Broadly feasible:** Identify additional products served in school meals that can be sourced regionally.
- **Moderately feasible:** Denote locally sourced produce and other food products.
- **Limited feasibility:** Publicly provide nutrition information, including but not limited to dietary specifications outlined in 7 CFR § 210.
- *Barriers include:*
  - *Cost and availability of nutrient analysis software.*
  - *Difficult to procure, track and communicate the source of products when purchased on a large scale.*

School Meals for All has forever changed student's meal experience

MA NSLP meals served in 2024

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Empowering meal variety, student choice and consumption of new/whole foods takes more time.

MA NSLP meals served in 2025

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Foundational Message from the Commission:

Continued support of Universal Free School Meals is essential to providing a stable source of funding from which school nutrition programs can begin to plan and invest in progress. Additionally, to optimize the benefits of Universal Free School Meals, attention should be paid to the amount of time that students have to select and consume the meals as well as the timing of recess to maximize consumption. Research shows increased consumption of school meals and reduced food waste with stronger minimum seated time policies.

Based on this research and Commission members' experience, the Commission recommends a 30-minute lunch period to achieve a minimum of 20 minutes of seated time to ensure students have enough time to consume high-quality meals served in the School Meal Programs. Recess before lunch is an important complement, which research has also shown to increase school meal consumption and reduce food waste.

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Broadly Feasible Recommendations

A. Continue to prioritize state resources and technical assistance available to School Food Authorities to support menu planning and culinary preparation using whole foods, including but not limited to increased beans, peas, and lentils. Offering beans, peas, and lentils beyond the current minimal federal requirements of once per week with the goal of three or more times per week.

B. Clearly label and promote vegetarian and vegan entrees and prepared sides served.

C. Expand communication, and information available to students and families requesting and receiving meal modifications. Increase the variety of modified meals, adapting a close equivalent to the main entrée.

D. Identify additional products served in school meals that can be sourced regionally.

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Local Priorities Need to Be Centered

Federal regulations set a strong set of standards that all schools are held to. As advancements are considered, each school and district has an inherently unique set of opportunities, needs and challenges. Supporting the advancement of school meals requires a targeted and tailored approach by DESE and partners, so that local community priorities are centered, and SMART (Specific, Measurable, Achievable, Reasonable and Timed) goals can be set and advancements sustained.

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The Power of the Local Wellness Policy

- Code of Federal Regulations 7 CFR 210.31(f) requires every district participating in the National School Lunch Program and/or School Breakfast Program to have a written wellness policy.
- A local wellness policy is a written document that guides a school district's efforts to establish an environment that promotes student health, well-being and ability to learn.
- Local wellness policies allow districts to set goals and standards specific to their own district. The Commission notes that local wellness policies are an effective way to engage with students and caregivers.
- DESE is working in partnership with School Wellness Initiative for Thriving Community Health (SWITCH) to help schools set stricter standards and targeted goals for school meals that meet local priorities.
- Development of a tool that provides sample language to districts looking to set specific goals on ingredients, local procurement, vegetarian/vegan meals, etc., is in process.

Continued Analysis and Report Out

- During the final commission meetings, a recommendation to establish a standing school nutrition advisory board for school meals in the Commonwealth was proposed. A vote was taken to recommend such a board as part of this report and the motion passed.
- Annually there is a Universal Free School Meals Report submitted by DESE to the legislature. DESE will leverage this report to continue analysis and report out on progress, including input from DPH as needed:
  - Each set of feasibility recommendations made in this report will be outlined for School Nutrition Professionals.
  - Resources that schools can use to support implementation will be identified.
  - Direction of how the new state-specific SWITCH local wellness policy evaluation tool can be used to leverage local school wellness policy to institutionalize local change.
  - Progress towards each level of feasibility will be measured and progress reported, beginning with the broad feasibility category.

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