



# SY 2024/25 SCHOOL NUTRITION TRENDS REPORT

## ABSTRACT

SNA surveyed its school nutrition director members in fall of 2024 to evaluate current challenges, understand the state of school nutrition program finances and staffing, examine concerns regarding forthcoming nutrition standards and assess menu trends.



## Table of Contents

<b>Objectives, Background and Sample</b>	<b>3</b>
<b>Executive Summary</b>	<b>5</b>
<b>Respondent Characteristics</b>	<b>9</b>
<b>Results</b>	
<i>Challenges for School Meal Programs</i>	<b>11</b>
<i>Meal Prices and Unpaid Meal Debt</i>	<b>15</b>
<i>Funding, Financial Sustainability, and Staffing</i>	<b>30</b>
<i>Federal School Nutrition Standards: Final Rule Concerns</i>	<b>37</b>
<i>Menu Trends</i>	<b>47</b>
<b>Appendices</b>	
<i>Appendix A – Please indicate the extent to which the following issues are a challenge for your school meal program: Disaggregated by USDA FNS region, Free-and-Reduced Rate, District Enrollment and selected variables</i>	<b>48</b>
<i>Appendix B – In April 2024, USDA published a final rule to update federal school nutrition standards. What is your level of concern about meeting each of the following requirements under this rule?: Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment</i>	<b>55</b>
<i>Appendix C – Please indicate your program’s need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment</i>	<b>60</b>
<i>Appendix D – Approximately how often does your program offer the following in reimbursable meals?: Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment</i>	<b>65</b>
<i>Appendix E – Which of the following concerns do you have regarding the non-domestic food purchases cap?: Open-Ended Responses</i>	<b>70</b>

Cover photo: Students in Glendale Elementary School District, Arizona, enjoy a healthy school lunch.  
Photo credit: Rick Brady/SNA.



## Objectives

- Identify the most salient current challenges facing school nutrition programs.
- Track the adequacy of reimbursement rates and trends in school meal prices.
- Evaluate the financial sustainability of school meals programs, the extent of unpaid meal charges and debt, and gauge the extent of staff vacancies in school nutrition programs.
- Examine concerns regarding the federal school nutrition final rule requirements.
- Capture emerging menu trends.

## Background and Sample

1. Background and Sample	
Survey open period	10/9/24 - 10/28/24
Full sample of surveyed school districts	3,987
Total number of unique respondent school districts	1,390
Response rate	34.9%

A note on interpreting statistical significance in this report: throughout this report, associations between variables that have been found to be statistically significant by a Chi-Square Test of Independence<sup>1</sup> are notated with the following symbols and corresponding meanings:

\*\* Statistically significant at the .001 level or lower (highest level of significance).

\*Statistically significant at the .05 level.

For example, if there is an \*\* next to 'Free-and-Reduced %' in a table of results for a question asking if the respondents are 'Not at all concerned', 'Moderately concerned' or 'Seriously concerned', then we can assume that the pattern of results to the question ("concern" in this example) are significantly statistically different based on the respondents' free-and-reduced % category.

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<https://libguides.library.kent.edu/spss/chisquare#:~:text=The%20Chi%2DSquare%20Test%20of%20Independence%20determines%20whether%20there%20is,Chi%2DSquare%20Test%20of%20Association.>



However, if there are no \*s, then it is not likely that the difference in responses is statistically significant – in other words, there is no real, measurable difference in the outcome value of one variable as it relates to the other, above and beyond the expected random chance of responses being what they may.

Statistically significant association is different from causation. While these statistical tests can determine if a difference in responses is significantly different based on the attributes of another variable, they cannot determine causation. In other words, while we may know two variables are significantly associated with this test, we cannot know if one is truly causing the difference in the other.



## Executive Summary

### *Challenges for School Meal Programs*

- The top 5 challenges for school meal programs, calculated by combining the percentages of each item rated as 'moderate' or 'significant' challenges, are:
  1. Food costs – 97.9% (n = 1,368)
  2. Labor costs – 94.9% (n = 1,297)
  3. Equipment costs – 91.4% (n = 1,248)
  4. Staff Shortages – 88.7% (n = 1,216)
  5. Procurement issues (e.g. long lead times, substitutions, late deliveries, insufficient bid responses) – 86.8% (n = 1,183)

Refer to **Appendix A** for response summary tables on each challenge, disaggregated by USDA FNS region, free-and-reduced percentage rate, district enrollment and other selected variables.

Several statistically significant associations were identified, including:

- The Southeast FNS region was the only region to report significant challenges with food costs, labor costs, and equipment costs at statistically significant levels higher than the overall reported rates of these challenges.
- Food costs were rated as a significant challenge at the highest rates by respondents in the Mid-Atlantic (82.7%, n = 86), the Southeast (79.9%, n = 187), and the Southwest (74.1%, n = 140) FNS regions.
- As district enrollment size increases, so does the percentage of respondents reporting significant challenges with labor costs. The percentage of respondents from the category with the highest number of students (25,000+) is 12 percentage points higher than the overall percentage.
- As district enrollment increases, so does the percentage of respondents reporting significant challenges with staff shortages. The percentage of respondents from the category with the highest number of students (25,000+) was 6.7% higher than the overall average.
- The rate of respondents reporting significant challenges with procurement issues (e.g. long lead times, substitutions, late deliveries, insufficient bid responses) was highest for districts with 25,000+ students (7.1% higher than the overall average) and lowest for districts with <1,000 students (6.1% lower than the overall average).
- 89.7% (n = 559) of respondents that do not serve all meals free rated getting families to submit free-and-reduced meal applications/household income forms as a



moderate or serious challenge, compared to 51.6% (n = 389) of respondents that do serve all meals free.

### *Meal Prices and Unpaid Meal Debt*

- The reported median per meal charge for students who pay full price for reimbursable meals increased in all categories for both breakfast and lunch from SY 2023/24 to SY 2024/25. For breakfast, the increases ranged from a 2.9% increase at the elementary level to an 11.1% increase at the high school level. Meanwhile, lunch price increases ranged from a 3.3% increase at the middle school level to a 4.9% increase at the high school level.
- The percentage of respondents reporting that their school nutrition program serves breakfast free to all students districtwide increased from 59.1% last year to 63.3% this year. Comparing back one year further, to SY 2022/23, there has been a 13.3% increase. The percentage of respondents reporting they serve lunch free to all students districtwide increased from 49.3% last year to 56.2% this year. Comparing back one year further, to SY 2022/23, there has been a 16.9% increase.<sup>2</sup>
- Among respondents that do not offer free meals to all students, 96.8% reported challenges with unpaid school meal charges/debt. Other reported challenges include families in need not receiving free and reduced-price benefits (89.3%), paperwork/administrative burden (88.7%), students going hungry/choosing not to eat (73.5%) and stigma for low-income students (68.9%).
- Median reported unpaid debt increased 25.6% from \$5,495 (n = 808) in fall of 2023 to \$6,900 (n = 766) in fall of 2024. This continues the nearly decade-long trend of increasing median unpaid meal debt. The reported unpaid meal debt of \$6,900 in fall 2024 was 102.9% higher than the median reported unpaid debt in SY 2017/18 (\$3,400, n = 570) and 245.0% higher than the median reported unpaid debt in SY 2014/15 (\$2,000, n=627).
- Notably, the largest percentages of directors reporting unpaid debt are from the Mountain Plains and the Midwest FNS regions, those programs with <26% free-

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<sup>2</sup> School nutrition programs offering free meals to all students districtwide may do so through several means: Community Eligibility Provision (CEP) districtwide, local or state provision of free meals for all students, or a combination of the previous. At the time of writing, eight states (California, Colorado, Maine, Massachusetts, Michigan, Minnesota, New Mexico, Vermont) have dedicated state funds to provide free school meals permanently.



and-reduced rate, and those programs not serving free meals to all students. In particular, the percentage of directors reporting unpaid meal debt that are not serving all meals free to all students is nearly 3.5 times higher than directors at programs serving all meals free to all students. There is also an inverse relationship between free-and-reduced percentage and reporting unpaid meal debt: the percentage of programs with <26% free-and-reduced rate reported having unpaid debt was three times higher than programs with >65% free-and-reduced.

### *Funding, Financial Sustainability, and Staffing*

- 62.6% of directors (n = 852) said the NSLP/SBP reimbursement rates were not sufficient to cover the cost of producing a breakfast and over two-thirds of directors (67.4%, n = 912) said they were not sufficient to cover the costs of producing a lunch.
- 92.1% (n = 1,258) of responding directors reported serious or moderate concern for the financial sustainability of their school meal programs three years from now, compared to 91.6% (n = 1,183) of responding directors who responded the same in SY 2023/24.
- 71.6% (n = 977) of respondents reported having at least one current staff vacancy. The overall vacancy rate of 8.7% is higher than the accommodation and food services industry job vacancy rate of 6.2% in October 2024, according to the [Bureau of Labor Statistics](#)<sup>3</sup>.
- The highest vacancy rates were reported by respondents in the Mid-Atlantic (12.76%, n=107) and those in districts with 25,000+ students (9.54%, n=141).

### *Federal School Nutrition Standards: Final Rule Concerns*

- The highest and most acute levels of concern regarding new federal school nutrition requirements established under the final rule are those effective July 1, 2027:
  - 78.6% of respondents (n = 1,053) reported 'serious concern' about the mandate to meet sodium limits that mirror Target 2 (a 10% reduction for breakfast and 15% for lunch)
  - 64.6% of respondents (n = 865) report 'serious concern' about the standard to limit added sugars to <10% of calories per week in school lunch and breakfast.

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<sup>3</sup> US Bureau of Labor Statistics. "Table 1. Job openings levels and rates by industry and region, seasonally adjusted", last modified January 7, 2025. Accessed on 1/7/2025.

<https://www.bls.gov/news.release/jolts.t01.htm>



- While there is concern regarding the July 1, 2025 product-based added sugar limits (78.4%, n = 1,044 report moderate/serious concern regarding flavored milk limits, for instance), it is not as acute as the concern for requirements effective in 2027.
- The top 3 methods programs have implemented to reduce added sugar in school breakfast are:
  - 1) Offer fresh produce in place of fruit with added sugar (64.7%, n = 851)
  - 2) Increase meat/meat alternative options (37.6%, n = 492)
  - 3) Increase scratch preparation (36.0%, n = 472)
- When asked about resources needed to achieve compliance with forthcoming limits on sodium and sugar:
  - 82.1% (n = 184) of responding programs from the Southeast FNS region reported 'extreme need' for increased funding, which was 12.6% higher than the overall percentage of all programs reporting 'extreme need' for increased funding (69.5%, n = 926).
  - 47.7% (n=62) of responding districts with 25,000+ students reported 'extreme need' for additional staff, which was 13.6% higher than the overall percentage of all responding programs reporting 'extreme need' for additional staff (34.1%, n = 454).

### *Menu Trends*

- 76.7% (n = 949) of respondents report their program offers scratch-prepared entrees on a daily or weekly basis. 70.6% (n = 839) of respondents report their program offers locally-grown/raised foods on a daily or weekly basis.
- Respondents from the largest districts (10,000+ students) and from districts with 26% or less free-and-reduced rate reported the highest rates of providing plant-based entrees on a daily or weekly basis.
- Respondents from the Northeast FNS region (44.4%, n = 56) and from districts with less than 26% free-and-reduced rate (36.7%, n = 66) reported the highest rates of providing customizable or made-to-order options.





## Respondent Characteristics

### 2. USDA FNS Region

Region	n	%
Mid-Atlantic	107	7.7
Midwest	373	26.9
Mountain Plains	126	9.1
Northeast	148	10.7
Southeast	237	17.1
Southwest	191	13.8
Western	207	14.9
Total	1,389	100.0

### 3. District Enrollment

	n	%
<1,000	197	14.2
1,000 - 2,499	331	23.8
2,500 - 4,999	299	21.5
5,000 - 9,999	229	16.5
10,000 - 24,999	193	13.9
25,000+	141	10.1
Total	1,390	100.0

### 4. Free-and-Reduced Rate

	n	%
<26%	225	16.3
26 - 50%	516	37.3
51 - 65%	293	21.2
>65%	348	25.2
Total	1,382	100.0



5. Do any of the schools in your district currently participate in the Community Eligibility Provision (CEP)?

	<b>n</b>	<b>%</b>
Yes	804	58.8
No	563	41.2
Total	1,367	100.0

6. What percentage of the schools in your district currently participate in the Community Eligibility Provision (CEP)?

	<b>n</b>	<b>%</b>
1 - 25%	81	10.1
26 - 50%	56	7
51 - 75%	61	7.6
76 - 99%	46	5.7
100%	560	69.7
Total	804	100.0
Note: Only respondents who answered 'Yes' to "Do any of the schools in your district currently participate in the Community Eligibility Provision (CEP)?" were asked this question.		

7. Do all schools in your district serve all meals free to all students?

	<b>n</b>	<b>%</b>
No	592	43.4
Yes	772	56.6
Total	1,364	100.0



## Results

### *Challenges for School Meal Programs*

- The top 5 challenges for school meal programs, calculated by combining the percentages of each item rated as 'moderate' or 'significant' challenges, are:
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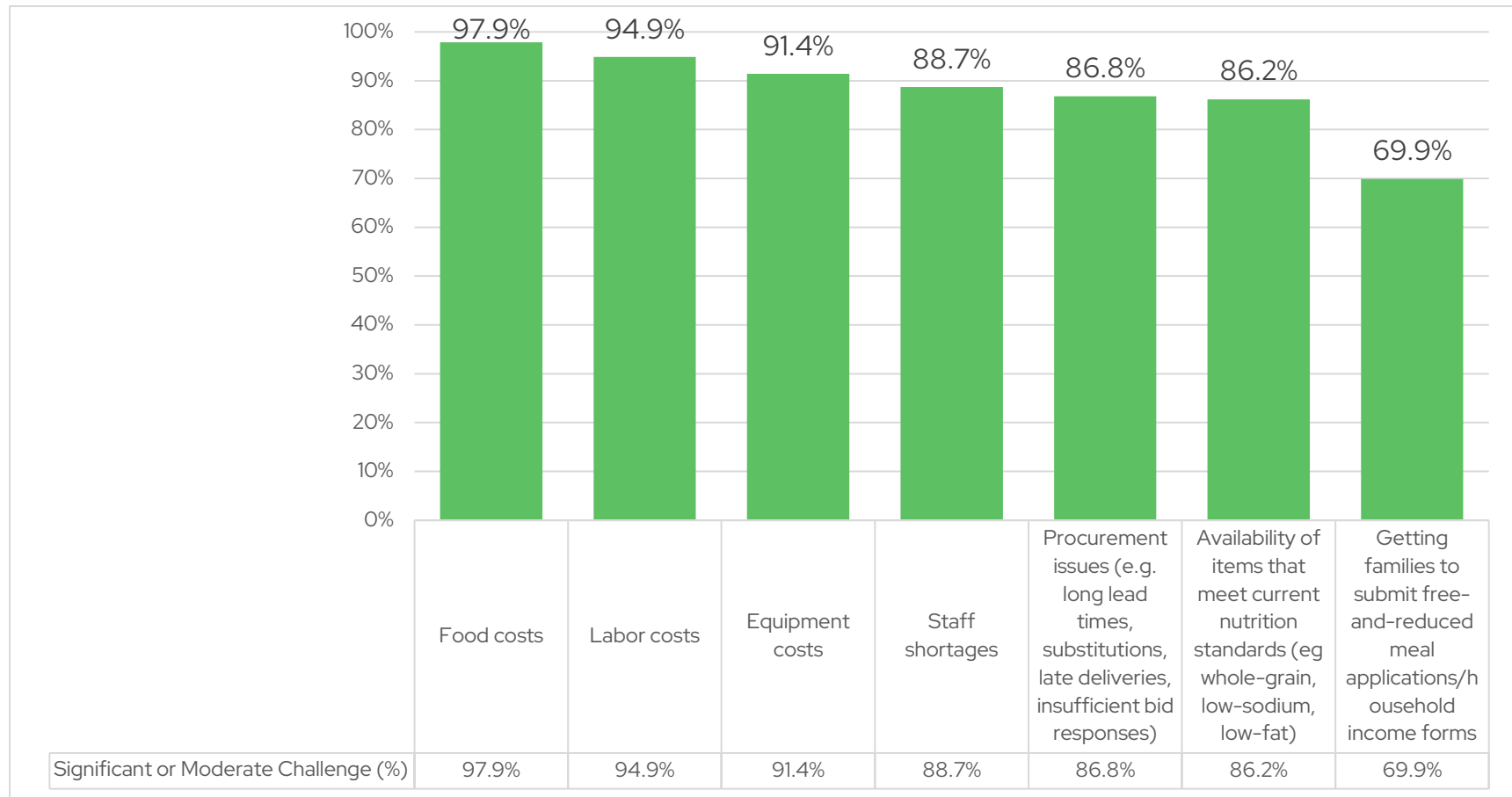
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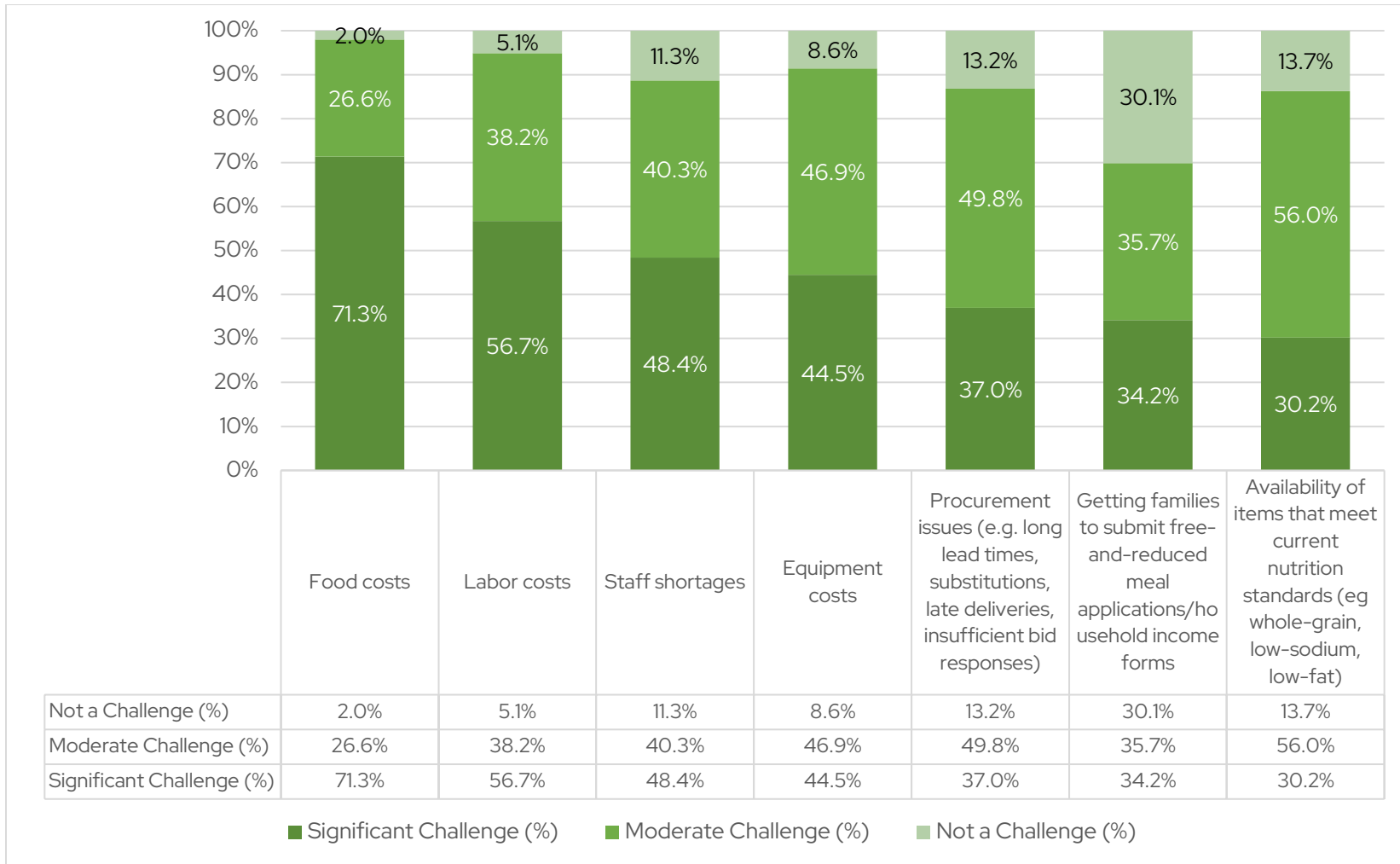
### 8. Significant or Moderate Challenges for Your School Meal Program (%)



Note: Each bar represents the percentage of school nutrition director respondents who identified a given item as either a 'Significant' or 'Moderate' challenge for their school meal program. Number of responses to items varies. Minimum n = 1,360; Maximum n = 1,371.



### 9. Challenges for Your School Meal Program by Severity



Note: Number of responses to items varies. Minimum n = 1,360; Maximum n = 1,371

## *Meal Prices and Unpaid Meal Debt*

- The reported median per meal charge for students who pay full price for reimbursable meals increased in all categories for both breakfast and lunch from SY 2023/24 to SY 2024/25. For breakfast, the increases ranged from a 2.9% increase at the elementary level to an 11.1% increase at the high school level. Meanwhile, lunch price increases ranged from a 3.3% increase at the middle school level to a 4.9% increase at the high school level.
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- Among respondents that do not offer free meals to all students, 96.8% reported challenges with unpaid school meal charges/debt. Other reported challenges include families in need not receiving free and reduced-price benefits (89.3%), paperwork/administrative burden (88.7%), students going hungry/choosing not to eat (73.5%) and stigma for low-income students (68.9%).
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- Notably, the largest percentages of directors reporting unpaid debt are from the Mountain Plains and the Midwest FNS regions, those programs with <26% free-and-reduced rate, and those programs not serving free meals to all students. In particular, the percentage of directors reporting unpaid meal debt that are not serving all meals free to all students is nearly 3.5 times higher than directors at

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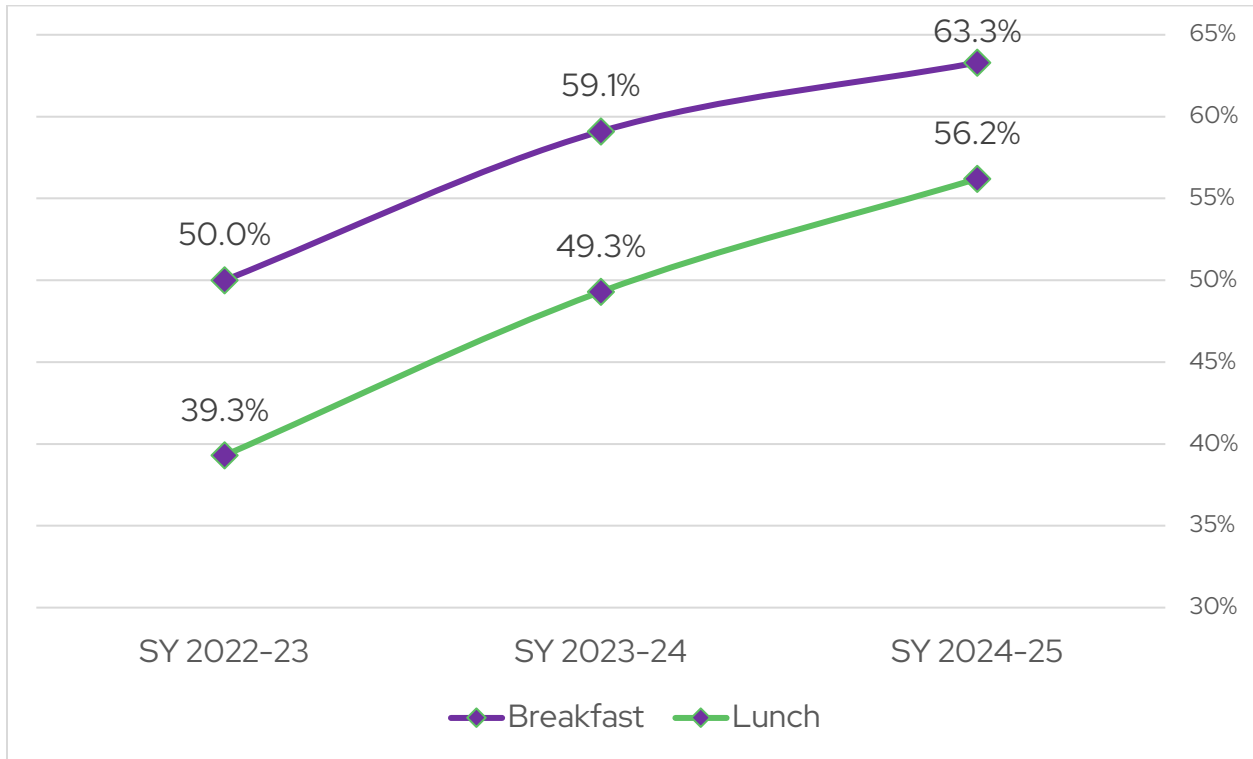


programs serving all meals free to all students. There is also an inverse relationship between free-and-reduced percentage and reporting unpaid meal debt: the percentage of programs with <26% free-and-reduced rate reported having unpaid debt was three times higher than programs with >65% free-and-reduced.





10. Is your program currently offering free school breakfast and/or lunch to ALL students districtwide? - SY 2024/25 vs. SY 2023/24



Note: School nutrition programs offering free meals to all students districtwide may do so through several means: Community Eligibility Provision (CEP) districtwide, local or state provision of free meals for all students, or a combination of the previous. SN 2024-25: n = 1,387. SY 2023-24: n = 1,343. SY 2022-23: n = 1,224. Percentages may not total to 100.0% due to rounding.



11. Per meal charge for students who pay full price for reimbursable meals for SY 2024/25

	School Level	10th percentile	25th percentile	50th percentile (median)	75th percentile	90th percentile	Average	n
Breakfast	Elementary	\$1.35	\$1.50	\$1.80	\$2.00	\$2.32	\$1.84	445
	Middle	\$1.45	\$1.60	\$1.90	\$2.25	\$2.50	\$1.92	445
	High	\$1.50	\$1.70	\$2.00	\$2.25	\$2.50	\$1.97	446
Lunch	Elementary	\$2.30	\$2.65	\$2.95	\$3.25	\$3.50	\$2.93	564
	Middle	\$2.50	\$2.80	\$3.10	\$3.45	\$3.75	\$3.13	563
	High	\$2.63	\$2.85	\$3.20	\$3.50	\$3.80	\$3.21	554

Note: This question only asked of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.

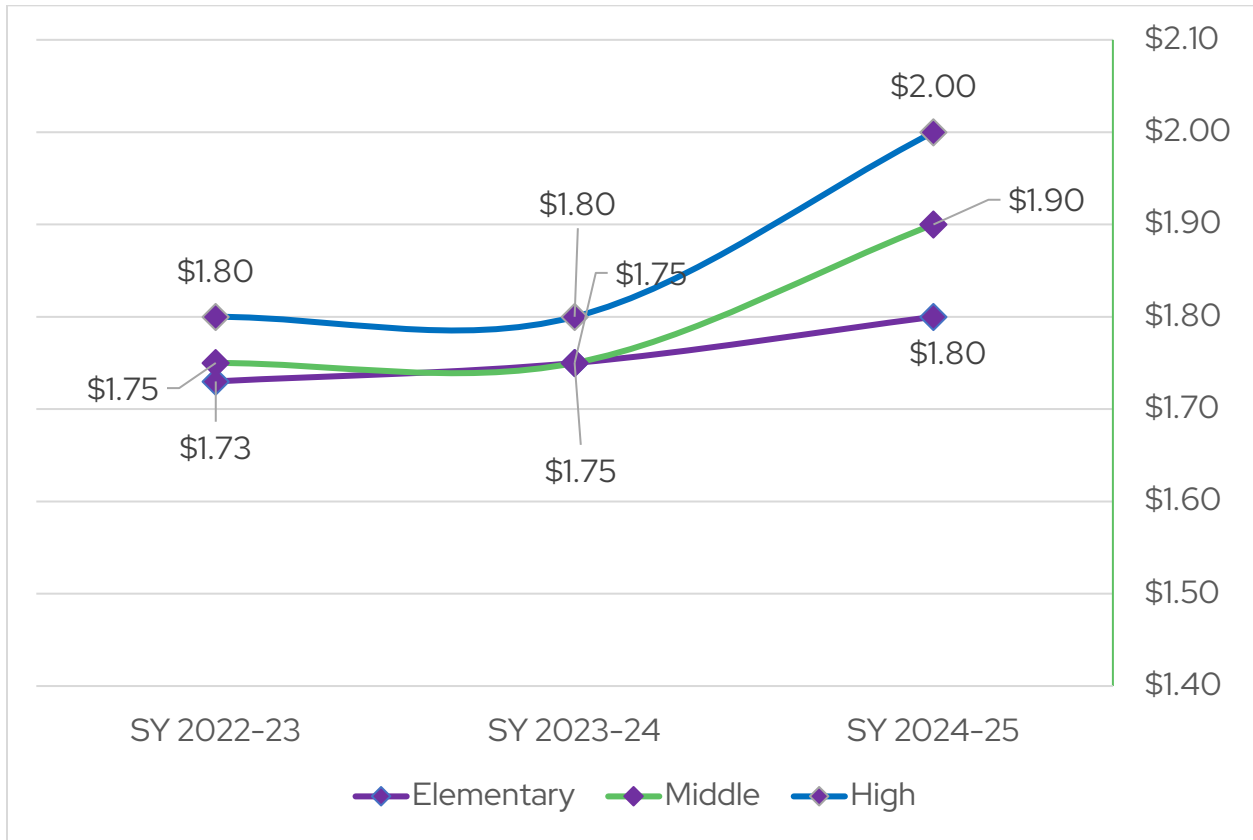


12. Median per meal charge for students who pay full price for reimbursable meals - SY 2024/25 vs. 2023/24

	<b>School Level</b>	<b>SY 2024/25 Median</b>	<b>SY 2023/24 Median</b>	<b>% Difference</b>
Breakfast	Elementary	\$1.80	\$1.75	2.9%
	Middle	\$1.90	\$1.75	8.6%
	High	\$2.00	\$1.80	11.1%
Lunch	Elementary	\$2.95	\$2.83	4.2%
	Middle	\$3.10	\$3.00	3.3%
	High	\$3.20	\$3.05	4.9%
<p>Note: This question only asked of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.</p> <p>Color code: Red indicates a price increase, gold indicates no change, green indicates price reduction from SY 2023-24 to SY 2024-25.</p>				



13. Median per meal charge for students who pay full price for breakfast by grade level: SY 2022/23 to SY 2024/25



Note: This question asked only of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.

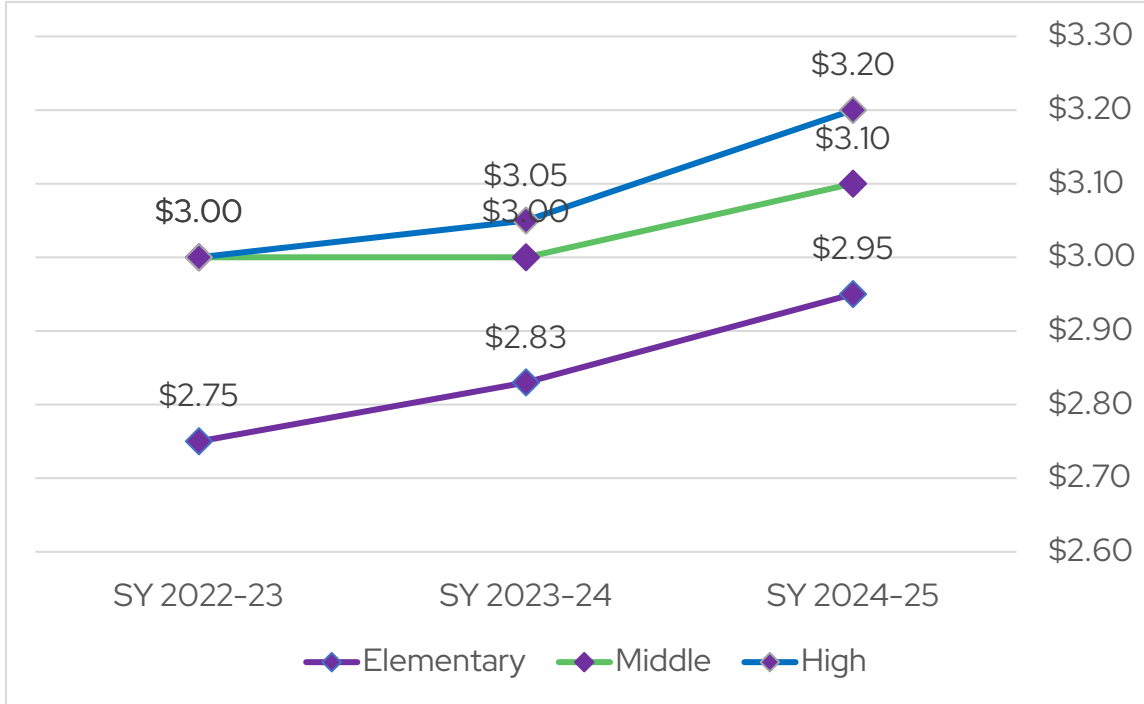


14. Median per meal charge for students who pay full price for breakfast for SY 2024/25 -  
Breakouts

	Overall	Elementary (n)	Middle (n)	High (n)
		<b>\$1.80 (445)</b>	<b>1.90 (445)</b>	<b>\$2.00 (446)</b>
USDA FNS Region	Mid-Atlantic	\$1.65 (25)	\$1.65 (24)	\$1.65 (23)
	Midwest	\$1.75 (141)	\$1.85 (139)	\$1.93 (140)
	Mountain Plains	\$1.93 (70)	\$2.00 (70)	\$2.00 (69)
	Northeast	\$2.00 (29)	\$2.25(31)	\$2.25 (33)
	Southeast	\$1.75 (54)	\$1.75 (55)	\$1.75 (55)
	Southwest	\$1.60 (86)	\$1.75 (86)	\$1.75 (85)
	Western	\$2.25 (40)	\$2.28 (40)	\$2.45 (41)
Free-and-Reduced%	<26%	\$2.00 (109)	\$2.00 (110)	\$2.10 (107)
	26 - 50%	\$1.75 (238)	\$1.85 (238)	\$1.95 (237)
	51 - 65%	\$1.75 (70)	\$1.83 (70)	\$1.85 (74)
	>65%	\$1.53 (28)	\$1.55 (27)	\$1.65 (28)
District Enrollment	<1,000	\$1.78 (56)	\$1.90 (55)	\$1.93 (58)
	1,000 - 2,499	\$2.00 (103)	\$2.00 (103)	\$2.00 (102)
	2,500 - 4,999	\$1.85 (88)	\$2.00 (89)	\$2.00 (91)
	5,000 - 9,999	\$1.85 (70)	\$1.98 (70)	\$2.00 (66)
	10,000 - 24,999	\$1.75 (73)	\$1.85 (73)	\$1.85 (75)
	25,000+	\$1.50 (55)	\$1.60 (55)	\$1.60 (54)
<p>Note: This question only asked of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.</p> <p>n = the number of responses for that specific category's (FNS region, Free-and-Reduced, or District Enrollment).</p>				



15. Median per meal charge for students who pay full price for lunch by grade level: SY 2022/23 to SY 2024/25



Note: This question asked only of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.

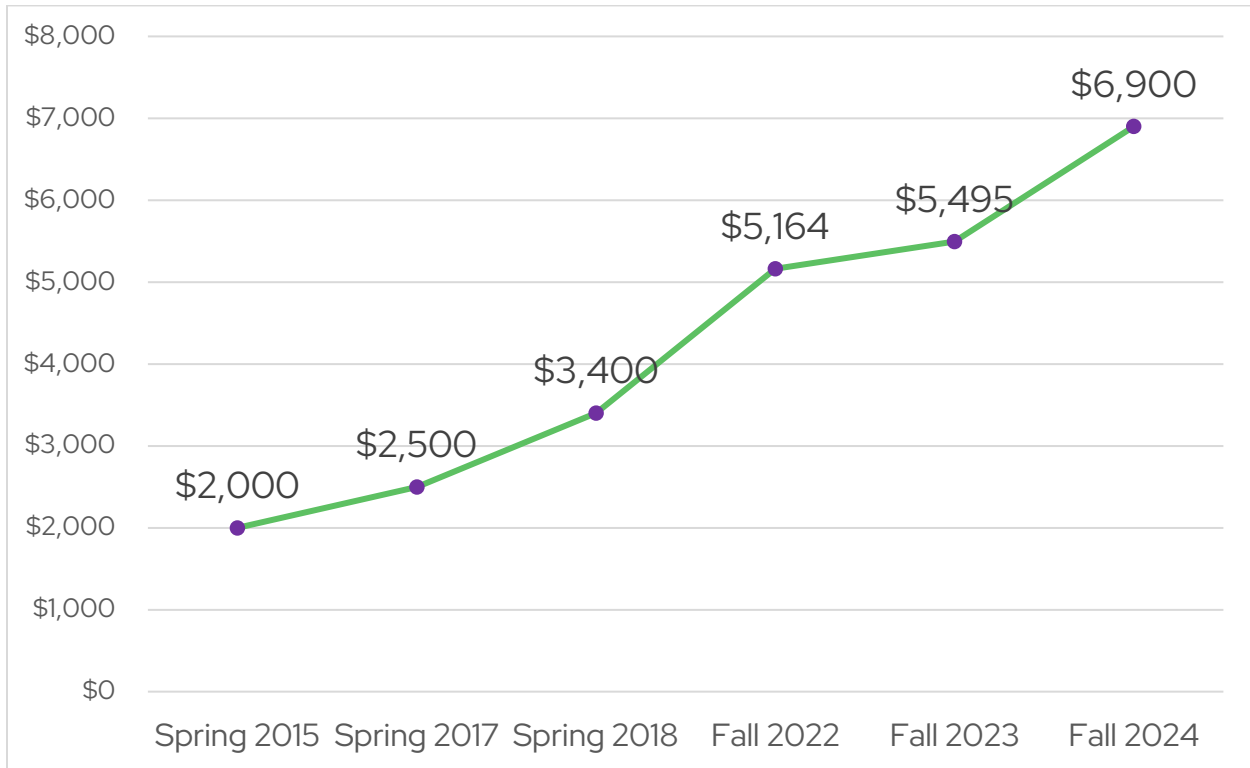


16. Median per meal charge for students who pay full price for lunch for SY 2024/25 - Breakouts

16. Median per meal charge for students who pay full price for lunch for SY 2024/25 - Breakouts				
	Overall	Elementary	Middle	High
		<b>\$2.93 (564)</b>	<b>\$3.10 (563)</b>	<b>\$3.20 (554)</b>
USDA FNS Region	Mid-Atlantic	\$2.90 (52)	\$3.05 (51)	\$3.10 (51)
	Midwest	\$2.90 (177)	\$3.05 (177)	\$3.20 (175)
	Mountain Plains	\$3.00 (76)	\$3.15 (76)	\$3.15 (74)
	Northeast	\$3.25 (32)	\$3.50 (32)	\$3.50 (33)
	Southeast	\$2.75 (73)	\$3.00 (73)	\$3.00 (71)
	Southwest	\$2.75 (105)	\$2.95 (105)	\$3.10 (102)
	Western	\$3.39 (49)	\$3.65 (49)	\$3.70 (48)
Free-and-Reduced%	<26%	\$3.10 (137)	\$3.25 (138)	\$3.35 (131)
	26 - 50%	\$2.95 (286)	\$3.10 (286)	\$3.20 (279)
	51 - 65%	\$2.75 (101)	\$3.00 (102)	\$3.00 (106)
	>65%	\$2.75 (40)	\$2.90 (37)	\$3.00 (38)
District Enrollment	<1,000	\$3.00 (77)	\$2.95 (66)	\$3.00 (66)
	1,000 - 2,499	\$3.00 (132)	\$3.15 (133)	\$3.25 (131)
	2,500 - 4,999	\$2.90 (119)	\$3.10 (121)	\$3.25 (119)
	5,000 - 9,999	\$2.90 (88)	\$3.08 (88)	\$3.20 (84)
	10,000 - 24,999	\$2.95 (81)	\$3.10 (81)	\$3.20 (84)
	25,000+	\$2.75 (67)	\$2.95 (66)	\$3.00 (66)
<p>Note: This question only asked of those who indicated that they were not 100% CEP districts and indicated that they were not providing breakfast and/or lunch for free to all students in their district.</p> <p>n = the number of responses for that specific category's (FNS region, Free-and-Reduced, or District Enrollment).</p>				



17. Reported median unpaid charges/debt: spring 2015 – fall 2024



Note: spring 2015 n = 627. spring 2017 n = 897. spring 2018 n = 570. fall 2022 n = 808. fall 2023 n = 847. fall 2024 n = 766.





18. Median unpaid meal charges/debt - SY 2024/25 vs. SY 2023/24

		SY 2024/25 Median	SY 2023/24 Median	Difference	SY 2024/25 n	SY 2023/24 n
<b>Overall</b>		<b>\$6,900.00</b>	<b>\$5,495.50</b>	<b>\$1,404.50</b>	<b>766</b>	<b>807</b>
USDA FNS Region	Mid-Atlantic	\$18,108.00	\$10,000.00	\$8,108.00	65	89
	Midwest	\$4,000.00	\$3,800.00	\$200.00	249	271
	Mountain Plains	\$6,861.50	\$7,150.00	(\$288.50)	88	108
	Northeast	\$4,996.50	\$4,000.00	\$996.50	68	73
	Southeast	\$7,527.00	\$5,931.00	\$1,596.00	100	103
	Southwest	\$12,000.00	\$7,881.00	\$4,119.00	121	98
	Western	\$10,000.00	\$13,315.50	(\$3,315.50)	75	66
Free-and-Reduced%	<26%	\$4,964.00	\$4,000.00	\$964.00	176	170
	26 - 50%	\$8,000.00	\$6,000.00	\$2,000.00	360	382
	51 - 65%	\$7,736.00	\$6,000.00	\$1,736.00	147	177
	>65%	\$5,000.00	\$5,000.00	\$0.00	83	79
District Enrollment	<1,000	\$1,353.00	\$1,055.00	\$298.00	111	117
	1,000 - 2,499	\$4,200.00	\$3,500.00	\$700.00	181	205
	2,500 - 4,999	\$5,300.00	\$5,931.00	(\$631.00)	165	173
	5,000 - 9,999	\$10,000.00	\$7,300.00	\$2,700.00	129	135
	10,000 - 24,999	\$22,916.50	\$19,030.00	\$3,886.50	104	103
	25,000+	\$40,713.50	\$39,500.00	\$1,213.50	76	75
Offer Free Meals to ALL students districtwide?	Yes	\$3,500.00	\$3,500.00	\$0.00	203	181
	No	\$8,040.00	\$6,394.00	\$1,646.00	561	627

Color coding: red=reported debt increased from SY 2023/24 to SY 2024/25, gold=reported debt stayed the same from SY 2023/24 to SY 2024/25, green=reported debt increased from SY 2023/24 to SY 2024/25.



## 19. Reported unpaid meal charges/debt: Breakouts

	Overall	Reported Unpaid Meal Debt (%)	10th percentile	25th percentile	50th percentile (median)	75th percentile	90th percentile	Average	Total Reported Debt	n
		55.1%	\$500.00	\$2,000.00	\$6,900.00	\$25,000.00	\$65,000.00	\$26,456.74	\$20,265,861	766
USDA FNS Region**	Mid-Atlantic	60.7%	\$1,027.20	\$4,464.00	\$18,108.00	\$56,887.50	\$150,000.00	\$75,387.18	\$4,900,167	65
	Midwest	66.8%	\$400.00	\$1,000.00	\$4,000.00	\$13,000.00	\$40,000.00	\$12,360.08	\$3,077,660	249
	Mountain Plains	69.8%	\$326.40	\$1,309.00	\$6,861.50	\$27,936.00	\$75,810.20	\$24,507.67	\$2,156,675	88
	Northeast	45.9%	\$168.00	\$1,000.00	\$4,996.50	\$11,500.00	\$35,037.20	\$12,684.62	\$862,554	68
	Southeast	42.2%	\$1,410.00	\$3,000.00	\$7,527.00	\$22,500.00	\$74,500.00	\$22,224.66	\$2,222,466	100
	Southwest	63.4%	\$1,775.20	\$4,100.00	\$12,000.00	\$48,750.00	\$123,000.00	\$38,989.37	\$4,717,714	121
	Western	36.2%	\$515.00	\$2,500.00	\$10,000.00	\$32,000.00	\$77,800.00	\$31,048.33	\$2,328,625	75
Free-and-Reduced%**	<26%	78.2%	\$354.70	\$1,350.00	\$4,964.00	\$23,512.50	\$47,332.20	\$19,945.44	\$3,510,398	176
	26 - 50%	69.8%	\$510.60	\$2,473.75	\$8,000.00	\$25,000.00	\$69,700.00	\$30,627.19	\$11,025,787	360
	51 - 65%	50.2%	\$690.00	\$2,000.00	\$7,736.00	\$30,000.00	\$61,000.00	\$25,735.94	\$3,783,183	147
	>65%	23.9%	\$500.00	\$1,500.00	\$5,000.00	\$22,000.00	\$75,000.00	\$23,41.72	\$1,946,493	83
District Enrollment	<1,000	56.3%	\$220.00	\$500.00	\$1,353.00	\$4,800.00	\$15,600.00	\$6,979.51	\$774,726	111
	1,000 - 2,499	54.7%	\$467.40	\$1,148.00	\$4,200.00	\$10,000.00	\$24,878.00	\$9,583.37	\$1,734,590	181
	2,500 - 4,999	55.2%	\$748.00	\$2,500.00	\$5,300.00	\$17,554.00	\$40,000.00	\$15,481.22	\$2,554,401	165
	5,000 - 9,999	56.3%	\$587.00	\$3,568.50	\$10,000.00	\$34,525.00	\$73,000.00	\$25,807.31	\$3,329,143	129
	10,000 - 24,999	53.9%	\$2,680.00	\$6,292.25	\$22,916.50	\$54,879.00	\$137,000.00	\$45,731.00	\$4,756,037	104
	25,000+	53.9%	\$2,710.00	\$9,140.50	\$40,713.50	\$96,750.00	\$250,000.00	\$93,644.26	\$7,116,964	76
Offer Free Meals to ALL students districtwide?**	Yes	26.3%	\$182.00	\$576.00	\$3,500.00	\$13,000.00	\$43,000.00	\$17,221.85	\$3,496,035	203
	No	94.8%	\$813.80	\$2,800.00	\$8,040.00	\$28,655.50	\$72,993.80	\$29,627.14	\$16,620,826	561

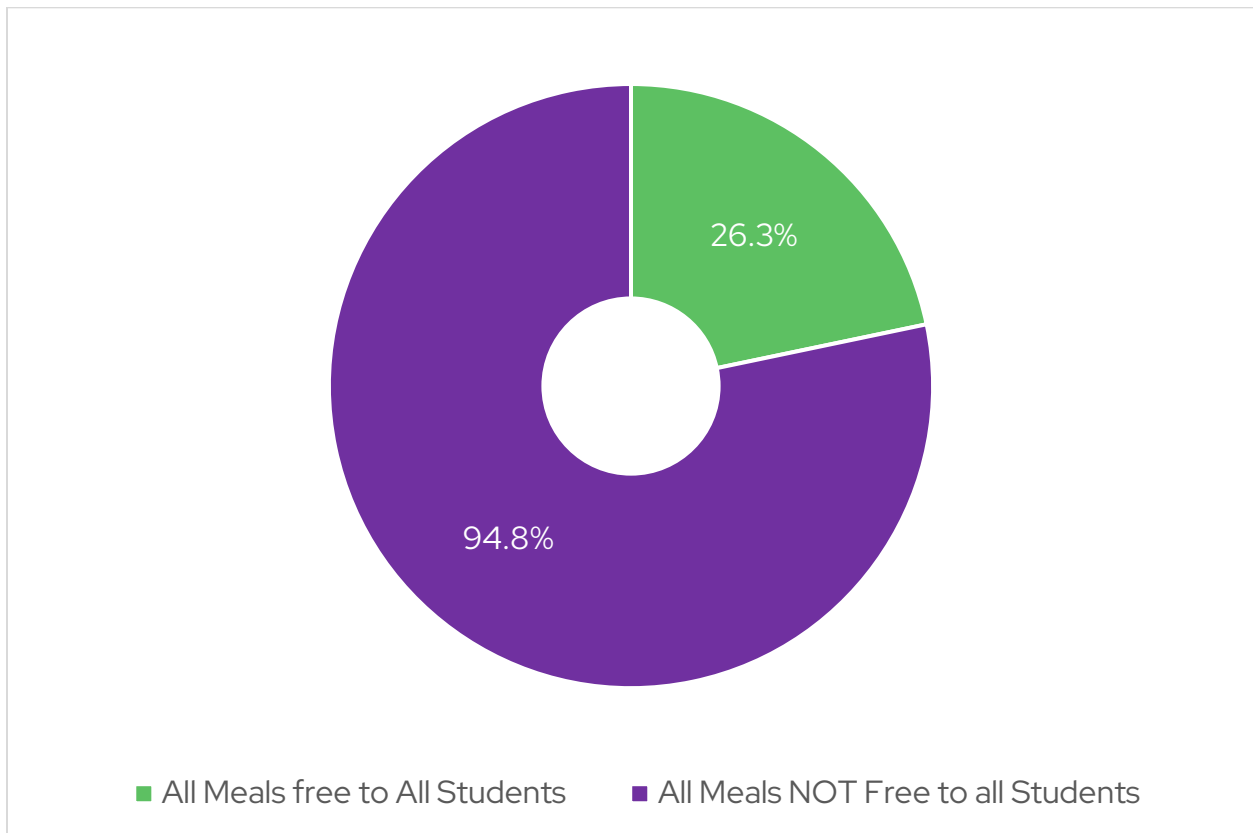
Note: Debt ranges from \$12.00 to \$1,600,000. Among the 766 unique school districts that reported their unpaid meal debt, total accumulated debt equaled \$20,265,861.

\*\*Chi-square tests of independence showed there are statistically significant associations between FNS Region, Free-and-Reduced%, and Offering Free Meals to ALL students districtwide, and reporting that a school district has unpaid meal debt.  $p < .001$ .

Note: School nutrition programs offering free meals to all students districtwide may do so through several means: Community Eligibility Provision (CEP) districtwide, local or state provision of free meals for all students, or a combination of the previous. At the time of writing, eight states (California, Colorado, Maine, Massachusetts, Michigan, Minnesota, New Mexico, Vermont) have dedicated state funds to provide free school meals permanently.



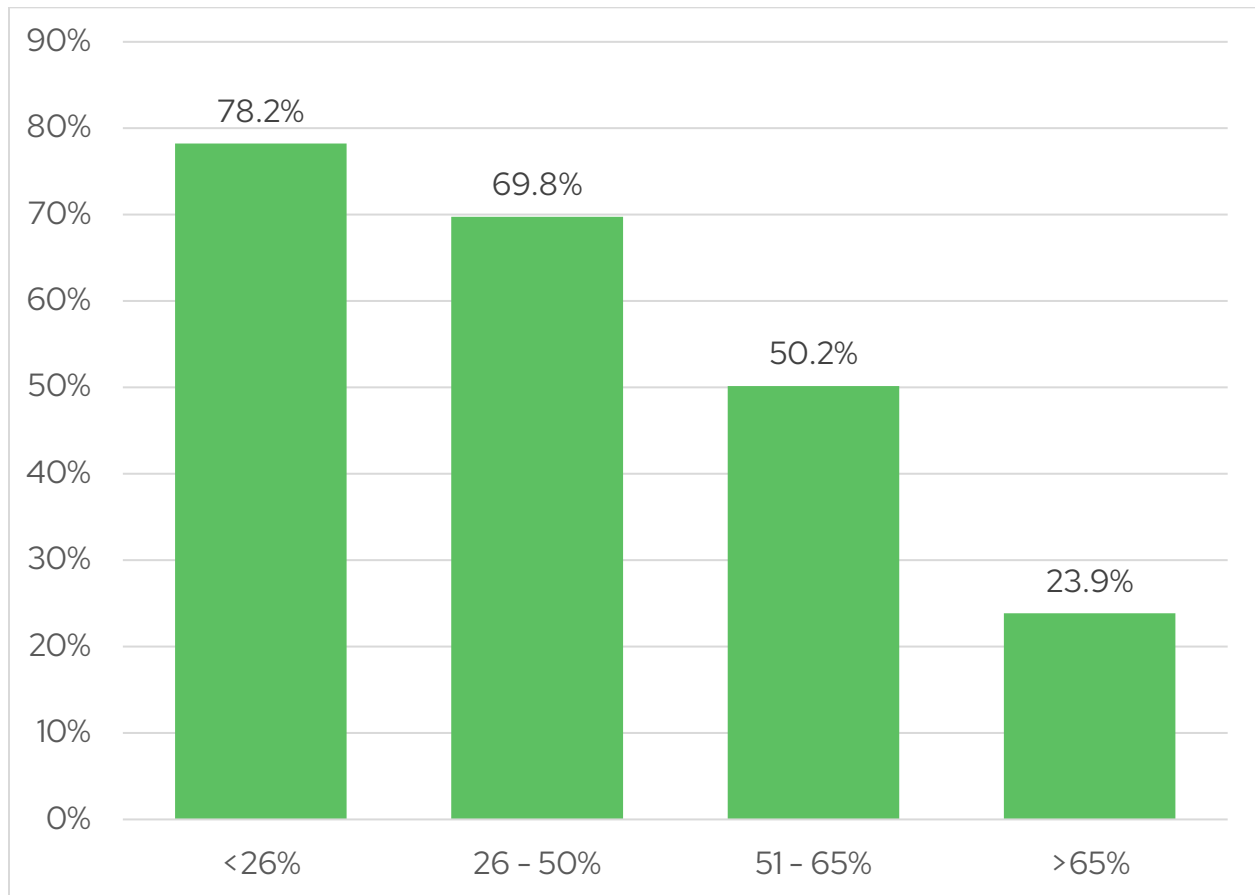
## 20. Percentage of programs reporting any unpaid meal charges/debt by All Meals Free Status



Note: School nutrition programs offering free meals to all students districtwide may do so through several means: Community Eligibility Provision (CEP) districtwide, local or state provision of free meals for all students, or a combination of the previous. At the time of writing, eight states (California, Colorado, Maine, Massachusetts, Michigan, Minnesota, New Mexico, Vermont) have dedicated state funds to provide free school meals permanently. n = 764.



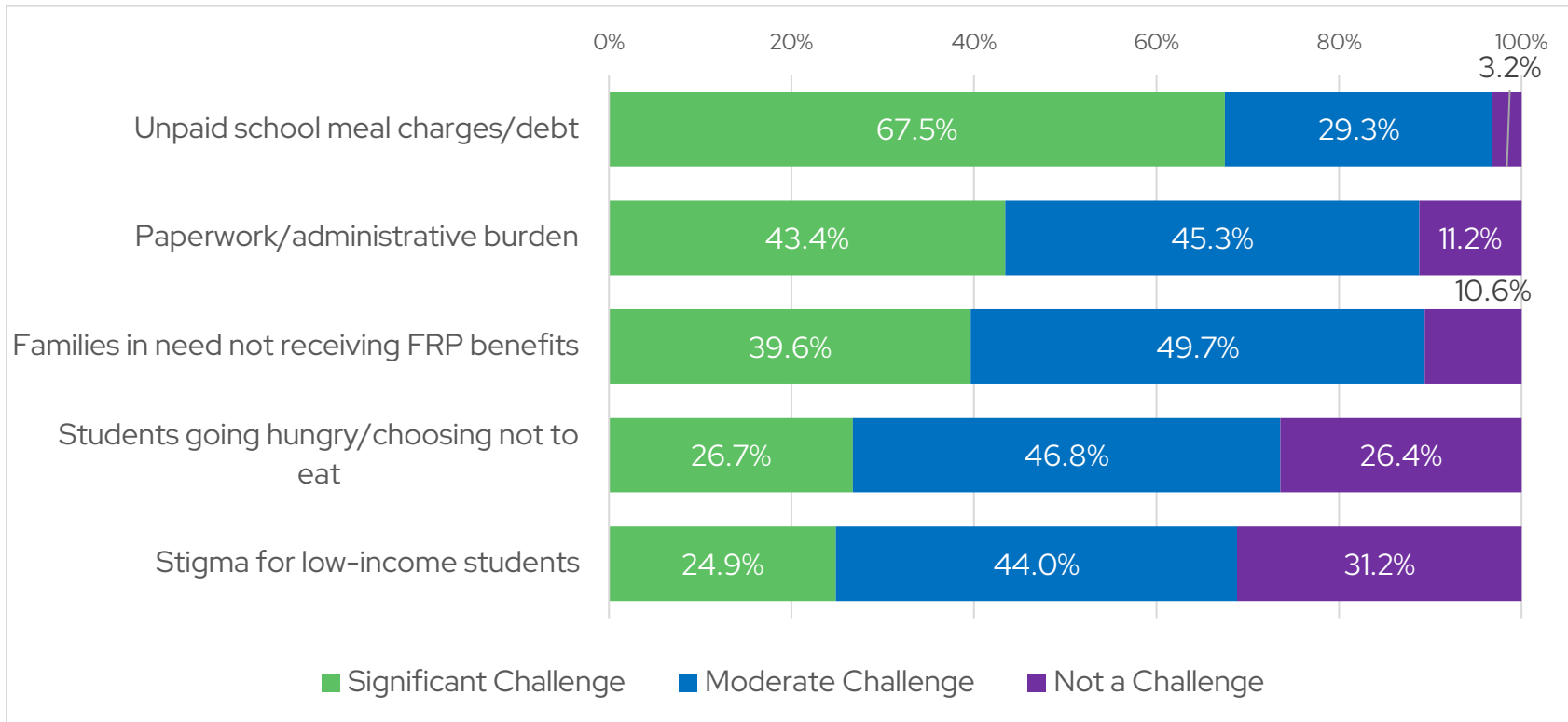
21. Percentage of programs reporting any unpaid meal charges/debt by Free-and-Reduced %



Note: n = 766.



22. In your school(s) that do NOT offer free meals to ALL students, to what extent are the following issues a challenge for your program?



Note: This question only asked of those who indicated they were not serving free school breakfasts and/or lunches to all students in their district. n varies by item, minimum n = 583, maximum n = 587.



### *Funding, Financial Sustainability, and Staffing*

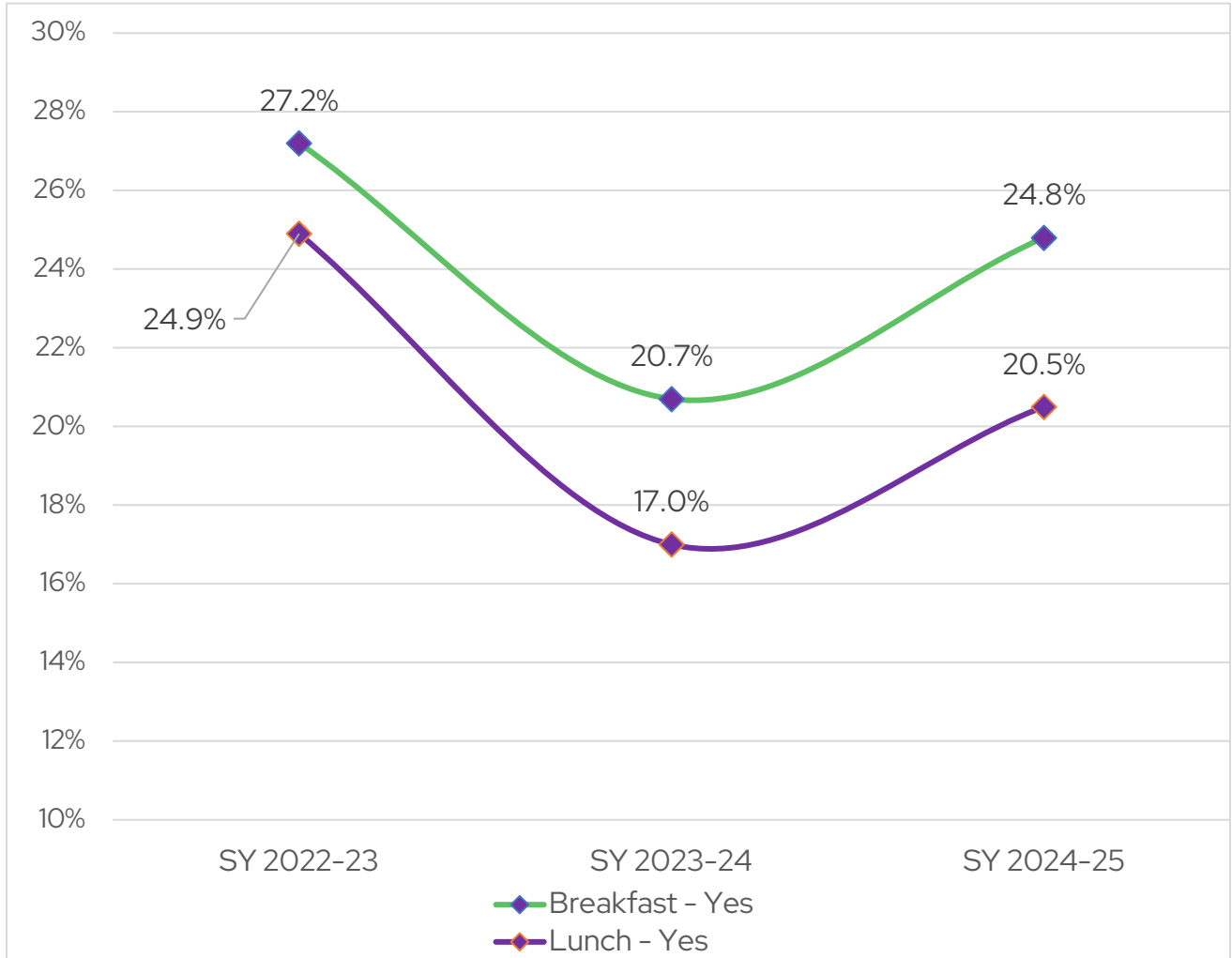
- 62.6% of directors (n = 852) said the NSLP/SBP reimbursement rates were not sufficient to cover the cost of producing a breakfast and over two-thirds of directors (67.4%, n = 912) said they were not sufficient to cover the costs of producing a lunch.
- 92.1% (n = 1,258) of responding directors reported serious or moderate concern for the financial sustainability of their school meal programs three years from now, compared to 91.6% (n = 1,183) of responding directors who responded the same in SY 2023/24.
- 71.6% (n = 977) of respondents reported having at least one current staff vacancy. The overall vacancy rate of 8.7% is higher than the accommodation and food services industry job vacancy rate of 6.2% in October 2024, according to the [Bureau of Labor Statistics](#)<sup>5</sup>.
- The highest vacancy rates were reported by respondents in the Mid-Atlantic (12.76%, n=107) and those in districts with 25,000+ students (9.54%, n=141).

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<sup>5</sup> US Bureau of Labor Statistics. "Table 1. Job openings levels and rates by industry and region, seasonally adjusted", last modified January 7, 2025. Accessed on 1/7/2025.  
<https://www.bls.gov/news.release/jolts.t01.htm>



23. Are SY 2024/25 NSLP/SBP per meal reimbursement rates alone sufficient to cover the cost of producing a meal (including food, labor, supplies and other costs) in your program?<sup>6</sup>



<sup>6</sup> The 2023 question read, "At the current time, are the SY 2022/2023 NSLP/SBP per meal reimbursement rates sufficient to cover the cost of producing a reimbursable meal (including food, labor, supplies, and other costs)?" The 2024 question read, "Since the expiration of the Keep Kids Fed Act additional reimbursements (15 cents per breakfast, 40 cents per lunch), are the current SY 2023/24 NSLP/SBP reimbursement rates sufficient to cover the cost of producing a meal (including food, labor, supplies and other costs) in your program?". The 2025 question read, "Are SY 2024/25 NSLP/SBP per meal reimbursement rates alone sufficient to cover the cost of producing a meal (including food, labor, supplies and other costs) in your program?".



24. Are SY 2024/25 SBP per meal reimbursement rates alone sufficient to cover the cost of producing a **breakfast** (including food, labor, supplies and other costs) in your program?

	Overall	Yes	No	Don't know/Not sure	n
		24.8%	62.6%	12.6%	1,361
USDA FNS Region	Midwest	18.6%	66.7%	14.7%	102
	Mid-Atlantic	24.2%	61.4%	14.3%	363
	Mountain Plains	19.4%	66.9%	13.7%	124
	Northeast	23.6%	68.8%	7.6%	144
	Southeast	29.5%	58.5%	12.0%	234
	Southwest	21.8%	67.6%	10.6%	188
	Western	30.7%	56.1%	13.2%	205
Free-and-Reduced%*	<26%	19.5%	69.7%	10.9%	221
	26 - 50%	21.7%	65.0%	13.4%	508
	51 - 65%	30.1%	60.2%	9.7%	289
	>65%	28.6%	56.6%	14.9%	343
District Enrollment**	<1,000	17.2%	64.6%	18.2%	192
	1,000 - 2,499	23.9%	59.2%	16.9%	326
	2,500 - 4,999	29.7%	62.2%	8.1%	296
	5,000 - 9,999	26.7%	66.2%	7.1%	225
	10,000 - 24,999	23.9%	62.8%	13.3%	188
	25,000+	25.4%	62.7%	11.9%	134

\*Chi-square tests of independence showed there is a statistically significant association between Free-and-Reduced % category and whether the SY 2024/2025 SBP per meal reimbursement rates were sufficient for a school meal program to cover the cost of producing a reimbursable breakfast (including food, labor, supplies, and other costs). p = .005.

\*\*Chi-square tests of independence showed there are statistically significant associations between district enrollment category and whether the SY 2024/2025 SBP per meal reimbursement rates were sufficient for a school meal program to cover the cost of producing a reimbursable breakfast (including food, labor, supplies, and other costs). p < .001.



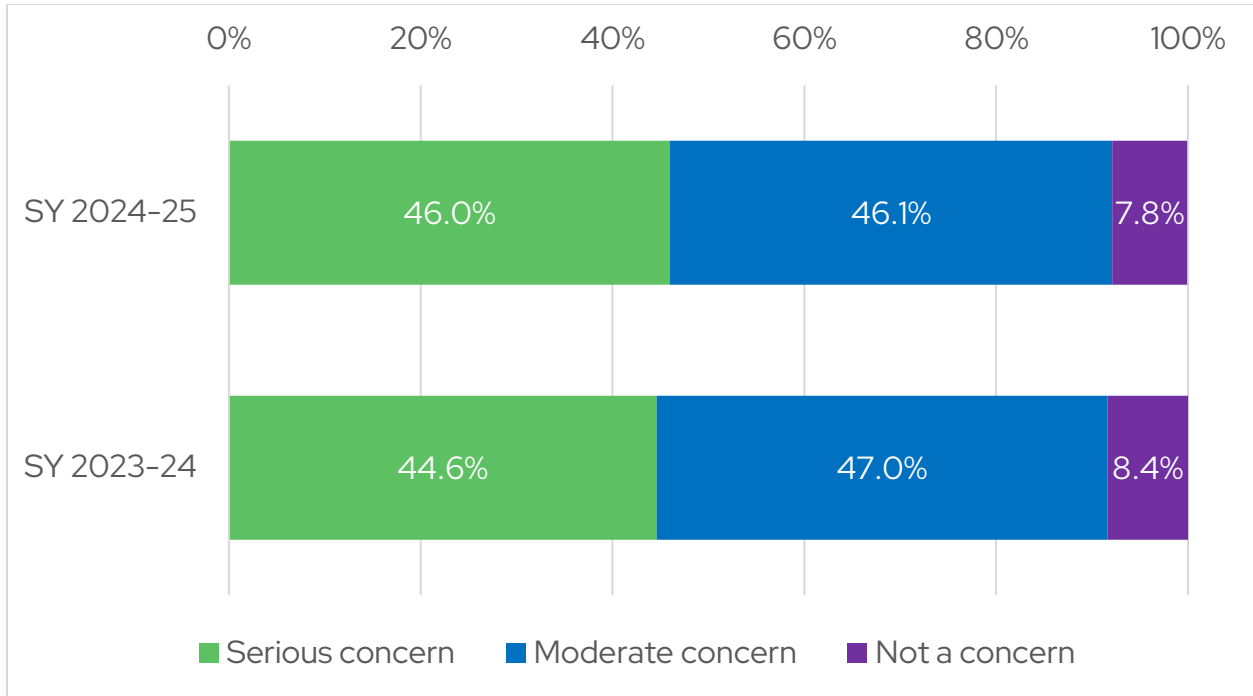


25. Are SY 2024/25 SBP per meal reimbursement rates alone sufficient to cover the cost of producing a **lunch** (including food, labor, supplies and other costs) in your program?

	Overall	Yes	No	Don't know/Not sure	n
		<b>20.5%</b>	<b>67.4%</b>	<b>12.2%</b>	<b>1,354</b>
USDA FNS Region*	Mid-Atlantic	10.8%	74.5%	14.7%	102
	Midwest	21.4%	64.6%	14.0%	364
	Mountain Plains	11.4%	75.6%	13.0%	123
	Northeast	27.7%	63.8%	8.5%	141
	Southeast	17.2%	71.2%	11.6%	233
	Southwest	21.6%	69.2%	9.2%	185
	Western	26.8%	60.5%	12.7%	205
Free-and-Reduced%*	<26%	18.0%	72.1%	9.9%	222
	26 - 50%	17.4%	70.2%	12.4%	507
	51 - 65%	22.2%	67.6%	10.2%	284
	>65%	25.2%	59.8%	15.0%	284
District Enrollment**	<1,000	11.6%	70.0%	18.4%	190
	1,000 - 2,499	22.3%	61.6%	16.1%	323
	2,500 - 4,999	23.2%	68.7%	8.1%	297
	5,000 - 9,999	21.4%	71.9%	6.7%	224
	10,000 - 24,999	19.3%	68.4%	12.3%	187
	25,000+	22.6%	65.4%	12.0%	133
<p>*Chi-square tests of independence showed there are statistically significant association between FNS region (<math>p = .005</math>), Free-and-Reduced% (<math>p = .017</math>), and whether the SY 2024/25 NSLP per meal reimbursement rates were sufficient for a school meal program to cover the cost of producing a reimbursable lunch (including food, labor, supplies, and other costs).</p> <p>**A chi-square test of independence showed there are statistically significant association between District Enrollment and whether the SY 2024/25 NSLP per meal reimbursement rates were sufficient for a school meal program to cover the cost of producing a reimbursable lunch (including food, labor, supplies, and other costs). <math>p &lt; .001</math>.</p>					



26. What is your level of concern regarding the financial sustainability of your school nutrition program 3 years from now?



Note: SY 2024-25 n = 1,366; SY 2023-24 n = 1,292.



27. What is your level of concern regarding the financial sustainability of your school nutrition program 3 years from now? - Breakouts

	Overall	Serious Concern	Moderate Concern	Not a Concern	n
		<b>46.0%</b>	<b>46.1%</b>	<b>7.8%</b>	<b>1,366</b>
USDA FNS Region**	Mid-Atlantic	46.1%	51.0%	2.9%	102
	Midwest	39.2%	52.6%	8.2%	367
	Mountain Plains	37.9%	55.6%	6.5%	124
	Northeast	42.4%	45.8%	11.8%	114
	Southeast	53.4%	41.0%	5.6%	234
	Southwest	54.3%	40.4%	5.3%	188
	Western	50.0%	37.9%	12.1%	206
Free-and-Reduced%	<26%	42.9%	50.0%	7.1%	224
	26 - 50%	46.4%	46.4%	7.3%	509
	51 - 65%	46.9%	46.2%	6.9%	290
	>65%	46.9%	43.1%	9.9%	343
District Enrollment**	<1,000	44.3%	50.0%	5.7%	194
	1,000 - 2,499	46.3%	44.2%	9.5%	328
	2,500 - 4,999	41.1%	51.9%	7.1%	297
	5,000 - 9,999	47.6%	43.1%	9.3%	225
	10,000 - 24,999	52.1%	41.0%	6.9%	188
	25,000+	47.8%	44.8%	7.5%	134
Offer Free Meals to ALL students	No	49.6%	45.6%	4.8%	601
	Yes	43.2%	46.6%	10.2%	762
<p>**Chi-square tests of independence showed there are statistically significant associations between both FNS region and free meals status, and reported level of concern regarding the financial sustainability of your school nutrition program 3 years from now. <math>p &lt; .001</math>.</p>					



## 28. Reported vacancies and vacancy rate

		% reporting a vacancy	Employees, Fully Staffed	# Current Vacancies	Vacancy Rate	n
<b>Overall</b>		<b>71.6%</b>	<b>130,796</b>	<b>11,295</b>	<b>8.64%</b>	<b>1,364</b>
USDA FNS Region**	Mid-Atlantic	78.5%	14,642	1868	12.76%	107
	Midwest	62.5%	18,347	1,664	9.07%	373
	Mountain Plains	65.9%	9,504	616	6.48%	126
	Northeast	69.6%	4,499	375	8.34%	148
	Southeast	79.3%	32,314	2,184	6.76%	237
	Southwest	74.3%	29,812	2,691	9.03%	191
	Western	69.6%	21,647	1,897	8.76%	207
Free-and-Reduced%	<26%	68.4%	11,896	907	7.62%	225
	26 - 50%	69.6%	40,462	3,711	9.17%	516
	51 - 65%	70.0%	29,008	2,201	7.59%	293
	>65%	74.4%	49,430	4,476	9.06%	348
District Enrollment**	<1,000	38.6%	1,400	118	8.43%	197
	1,000 - 2,499	54.1%	6,617	468	7.07%	331
	2,500 - 4,999	72.6%	10,810	731	6.76%	299
	5,000 - 9,999	84.7%	14,608	964	6.60%	229
	10,000 - 24,999	92.2%	24,677	2,077	8.42%	193
	25,000+	94.3%	72,684	6,937	9.54%	141
Offer Free Meals to ALL students	Yes	69.4%	68,981	6,274	9.10%	778
	No	70.4%	61,663	5,018	8.14%	609

\*\*Chi-square tests of independence showed there are statistically significant association between FNS region, district enrollment, and the percentage of respondents reporting a vacancy. < .001.



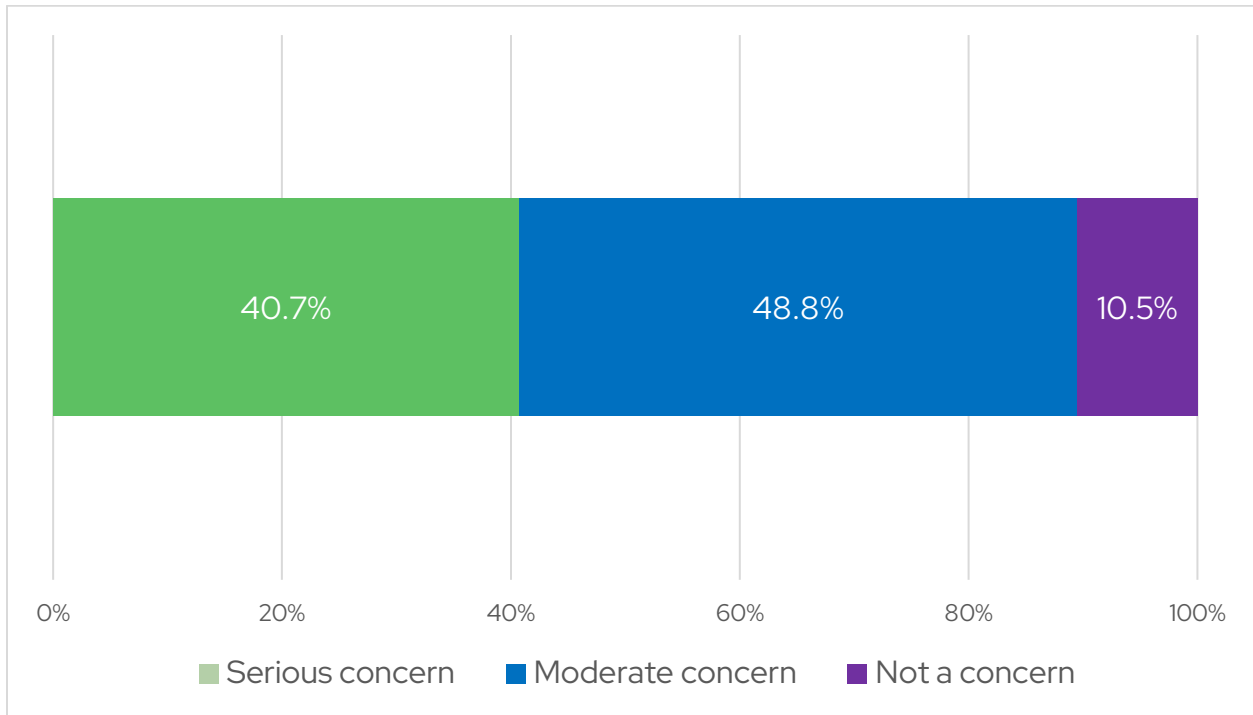
### *Federal School Nutrition Standards: Final Rule Concerns*

- The highest and most acute levels of concern regarding new federal school nutrition requirements established under the final rule are those effective July 1, 2027:
  - 78.6% of respondents (n = 1,053) reported 'serious concern' about the mandate to meet sodium limits that mirror Target 2 (a 10% reduction for breakfast and 15% for lunch)
  - 64.6% of respondents (n = 865) report 'serious concern' about the standard to limit added sugars to <10% of calories per week in school lunch and breakfast.
  - While there is concern regarding the July 1, 2025 product-based added sugar limits (78.4%, n = 1,044 report moderate/serious concern regarding flavored milk limits, for instance), it is not as acute as the concern for requirements effective in 2027.
- The top 3 methods programs have implemented to reduce added sugar in school breakfast are:
  - 1) Offer fresh produce in place of fruit with added sugar (64.7%, n = 851)
  - 2) Increase meat/meat alternative options (37.6%, n = 492)
  - 3) Increase scratch preparation (36.0%, n = 472)
- When asked about resources needed to achieve compliance with forthcoming limits on sodium and sugar:
  - 82.1% (n= 184) of responding programs from the Southeast FNS region reported 'extreme need' for increased funding, which was 12.6% higher than the overall percentage of all programs reporting 'extreme need' for increased funding (69.5%, n = 926).
  - 47.7% (n=62) of responding districts with 25,000+ students reported 'extreme need' for additional staff, which was 13.6% higher than the overall percentage of all responding programs reporting 'extreme need' for additional staff (34.1%, n = 454).



29. USDA's final rule updated Buy American requirements, establishing a new cap on non-domestic food purchases.

What is your level of concern about meeting the non-domestic food purchase cap?



n = 1,335.



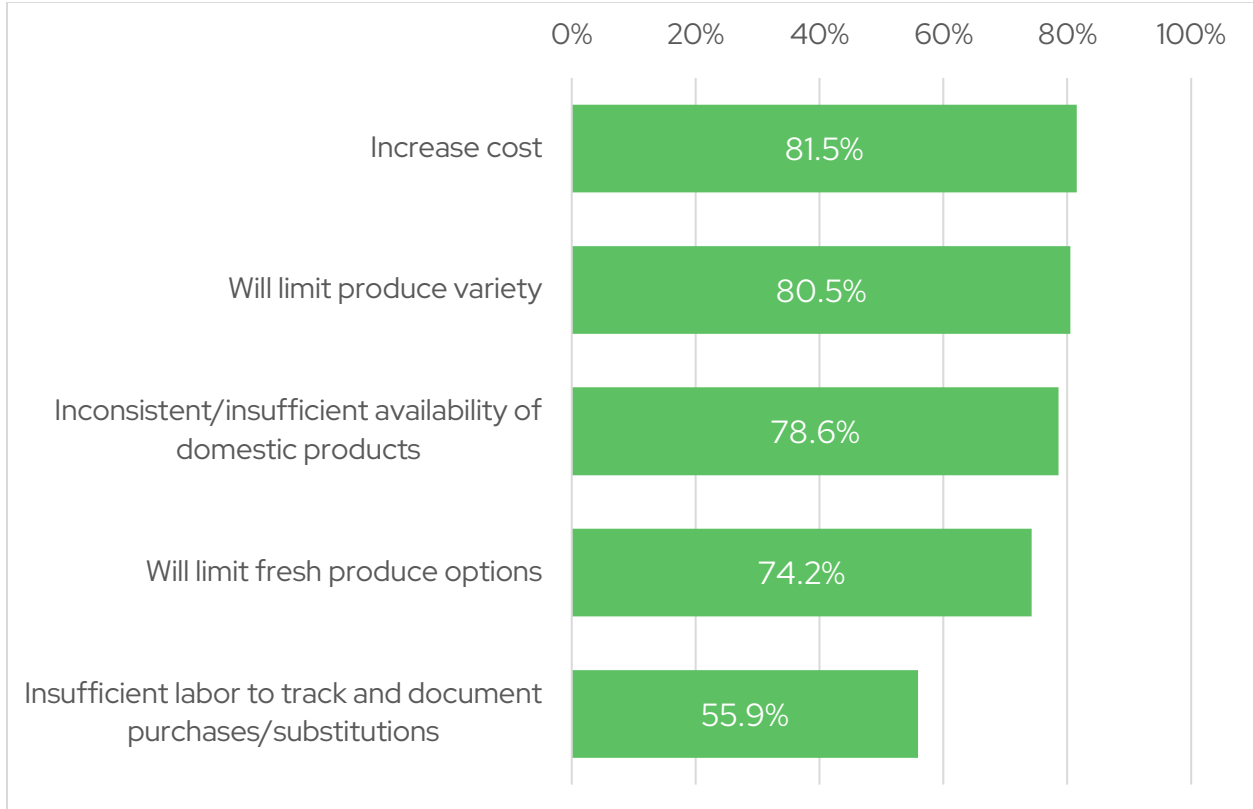
30. USDA's final rule updated Buy American requirements, establishing a new cap on non-domestic food purchases.

What is your level of concern about meeting the non-domestic food purchase cap?

	Overall	Serious concern	Moderate concern	No, not a challenge	n
		40.7%	48.8%	10.5%	1,335
USDA FNS Region*	Mid-Atlantic	27.7%	60.4%	11.9%	101
	Midwest	36.1%	53.5%	10.4%	355
	Mountain Plains	48.3%	40.8%	10.8%	120
	Northeast	34.0%	51.8%	14.2%	141
	Southeast	44.2%	48.2%	7.5%	226
	Southwest	47.0%	44.3%	8.6%	185
	Western	46.1%	41.7%	12.1%	206
Free-and-Reduced%	<26%	36.8%	46.8%	16.4%	220
	26 - 50%	39.2%	51.3%	9.5%	497
	51 - 65%	42.3%	47.5%	10.2%	284
	>65%	44.3%	47.3%	8.4%	334
District Enrollment	<1,000	37.2%	53.9%	8.9%	191
	1,000 - 2,499	38.6%	51.4%	10.0%	319
	2,500 - 4,999	39.5%	51.0%	9.5%	294
	5,000 - 9,999	41.3%	42.2%	16.5%	218
	10,000 - 24,999	47.5%	44.3%	8.2%	183
	25,000+	43.8%	46.9%	9.2%	130
*A chi-square test of independence showed there is a statistically significant association between FNS region and reported level of concern about meeting the non-domestic food purchase cap. P = .007.					



31. Which of the following concerns do you have regarding the non-domestic food purchase cap?



Note: This question was only asked of those who responded "Serious concern" or "Moderate concern" to the prior question, "USDA's final rule updated Buy American requirements, establishing a new cap on non-domestic food purchases. What is your level of concern about meeting the non-domestic food purchase cap?" An 'Other, please specify' option was provided, and received 66 responses. They can be found in Appendix E of this report.

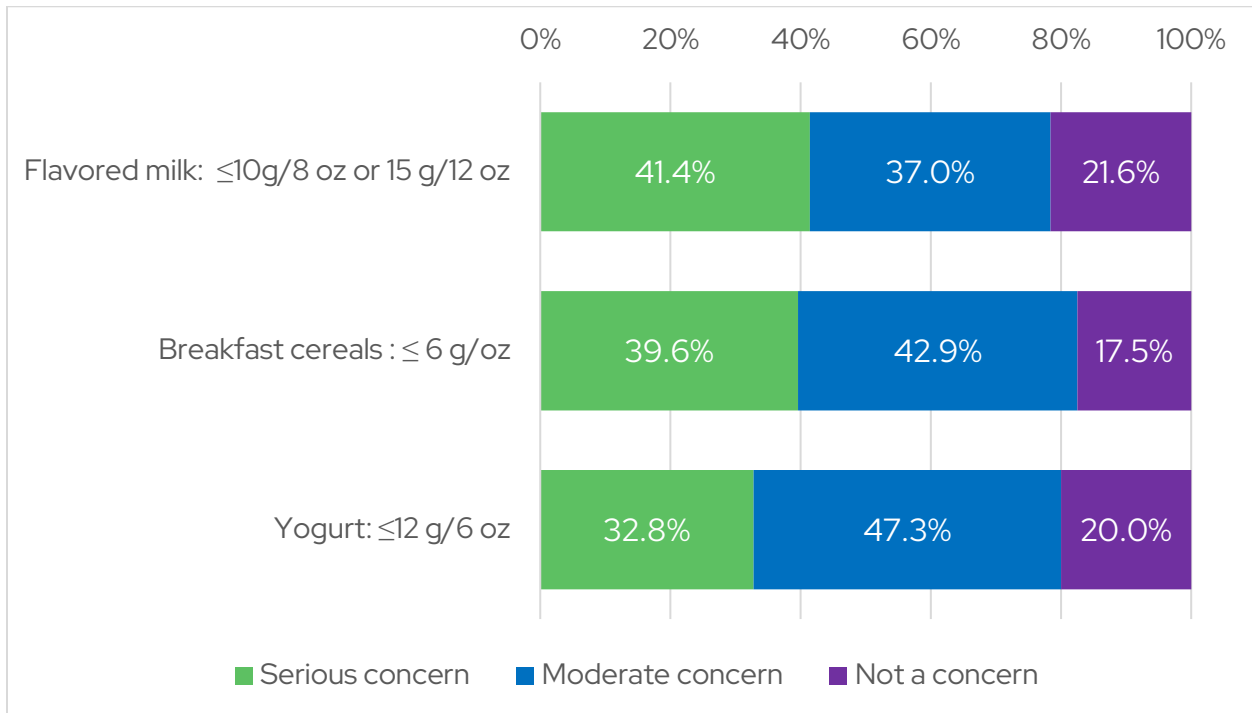




32. In April 2024, USDA published a final rule to update federal school nutrition standards.

What is your level of concern about meeting each of the following requirements under this rule?

Beginning July 1, 2025, new product-based added sugar limits for:

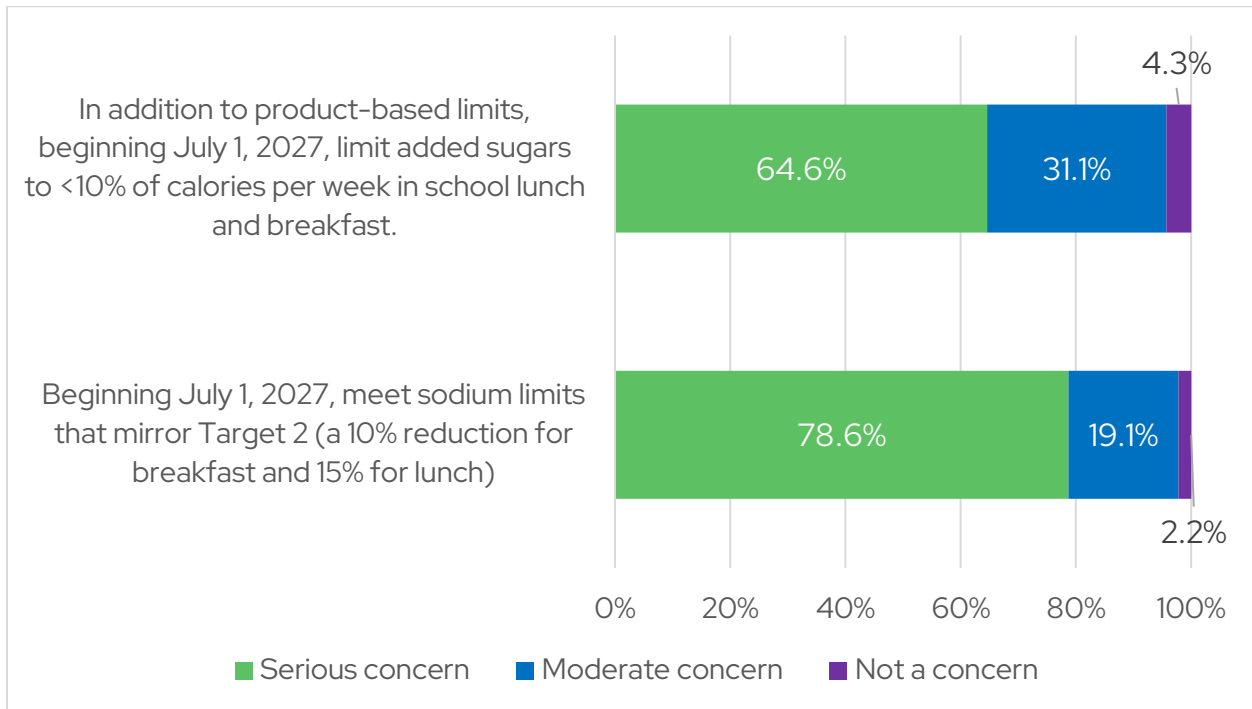


n varies by item. Minimum= 1,332 to maximum= 1,337. See Appendix B for breakdowns by FNS region, Free-and-reduced %, and student enrollment size. The wording of this question in the survey that respondents took read, "In January 2024..." in error. This error has been corrected in this report.



33. In April 2024, USDA published a final rule to update federal school nutrition standards.

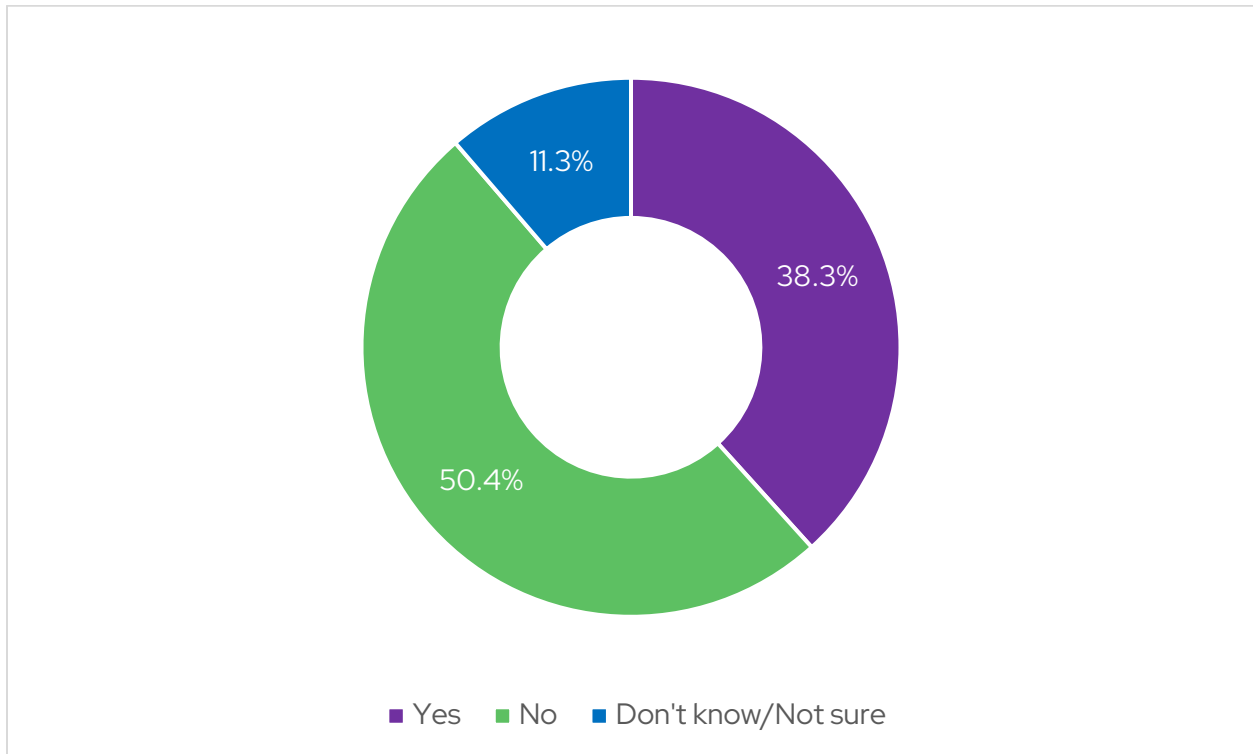
What is your level of concern about meeting each of the following requirements under this rule?



n varies by item: minimum = 1,338 to maximum= 1,339. See Appendix B for breakdowns by FNS region, Free-and-reduced %, and student enrollment size. The wording of this question in the survey that respondents took read, "In January 2024..." in error. This error has been corrected in this report.



34. Has your program calculated total added sugars for your weekly school breakfast and lunch menus?



n = 1,331.



35. Has your program calculated total added sugars for your weekly school breakfast and lunch menus? - Breakouts

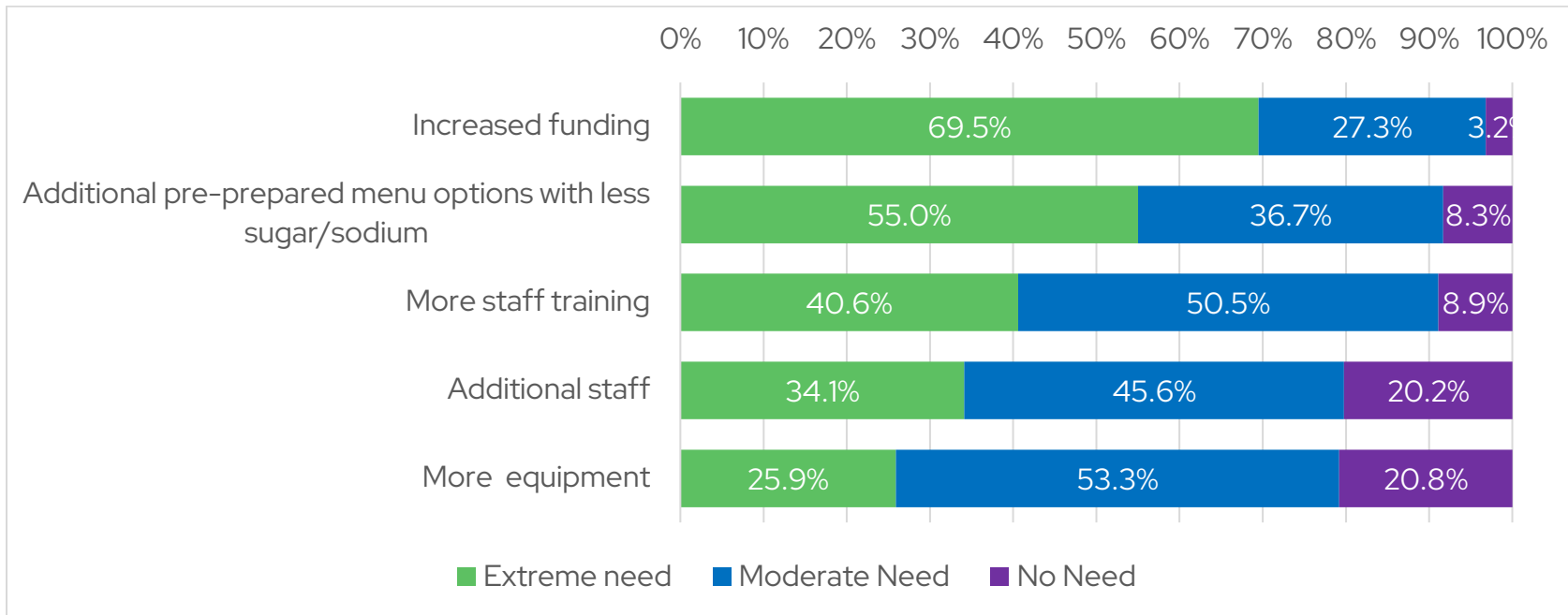
35. Has your program calculated total added sugars for your weekly school breakfast and lunch menus? - Breakouts					
	Overall	Yes	No	Don't know/Not sure	n
		38.3%	50.4%	11.3%	1,331
USDA FNS Region*	Mid-Atlantic	27.0%	65.0%	8.0%	100
	Midwest	33.8%	54.1%	12.1%	355
	Mountain Plains	35.8%	55.0%	9.2%	120
	Northeast	37.6%	55.3%	7.1%	141
	Southeast	41.5%	44.6%	13.8%	224
	Southwest	47.3%	40.8%	12.0%	184
	Western	41.7%	46.1%	12.1%	206
Free-and-Reduced %*	<26%	34.1%	56.4%	9.5%	220
	26 - 50%	35.8%	53.7%	10.5%	495
	51 - 65%	40.3%	50.2%	9.5%	283
	>65%	43.2%	41.7%	15.0%	333
District Enrollment**	<1,000	34.0%	54.5%	11.5%	191
	1,000 - 2,499	38.5%	51.1%	10.4%	317
	2,500 - 4,999	35.0%	58.2%	6.8%	294
	5,000 - 9,999	37.8%	52.1%	10.1%	217
	10,000 - 24,999	42.6%	42.1%	15.3%	183
	25,000+	46.5%	34.1%	19.4%	129

\*A chi-square test of independence showed there is a statistically significant association between FNS region ( $p = .006$ ) and Free-and-Reduced % ( $p = .007$ ) and whether or not program has calculated total added sugars for their weekly school breakfast and lunch menus.

\*\*A chi-square test of independence showed there is a statistically significant association between district enrollment and whether or not program has calculated total added sugars for their weekly school breakfast and lunch menus.  $p < .001$ .



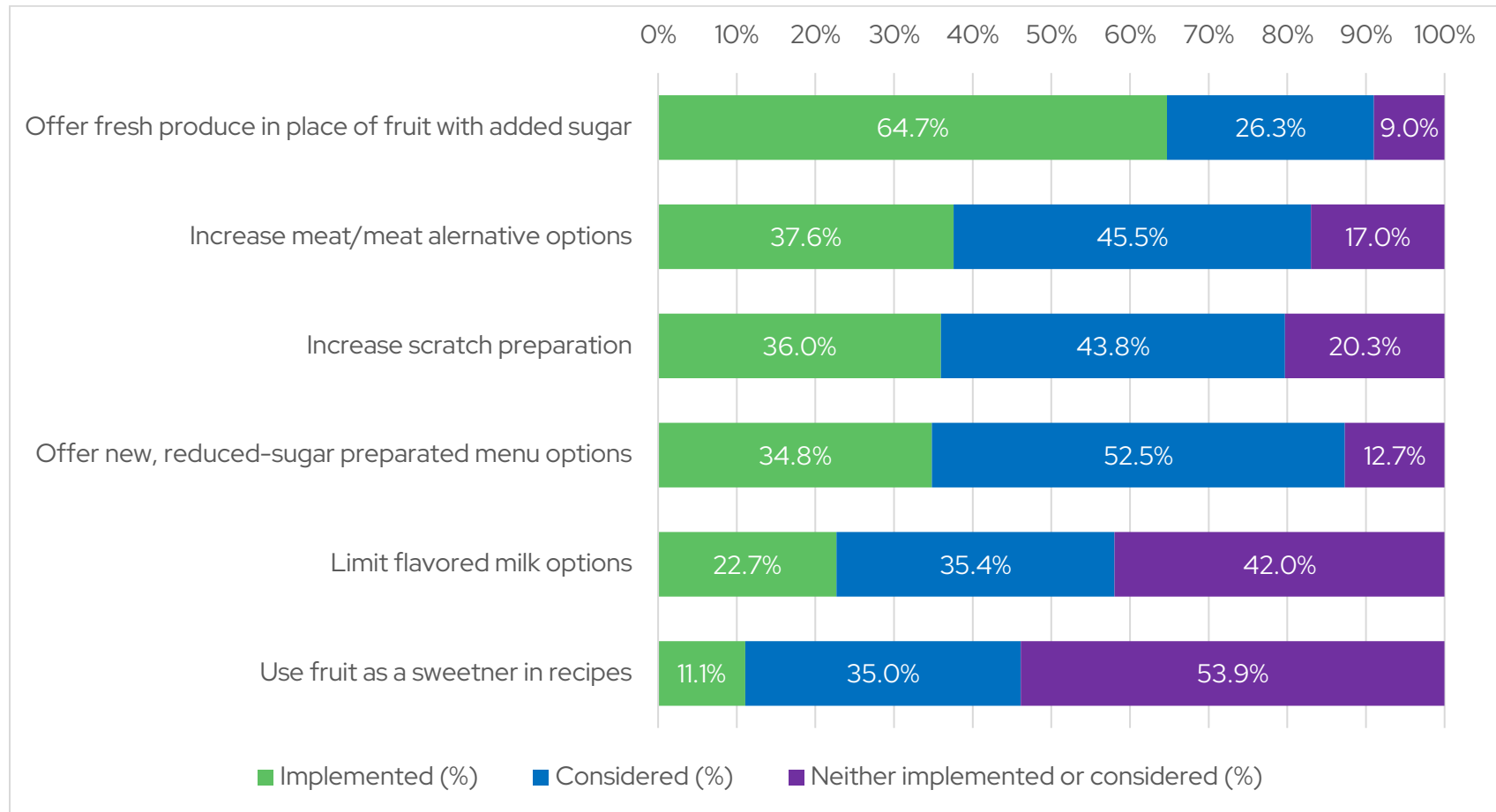
36. Please indicate your program’s need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar.



n varies by item: minimum = 1,319 to maximum = 1,325. See Appendix C for breakdowns by FNS region, Free-and-reduced %, and student enrollment size.



37. Which of the following methods has your program implemented or are being considered to reduce added sugar in school breakfast?



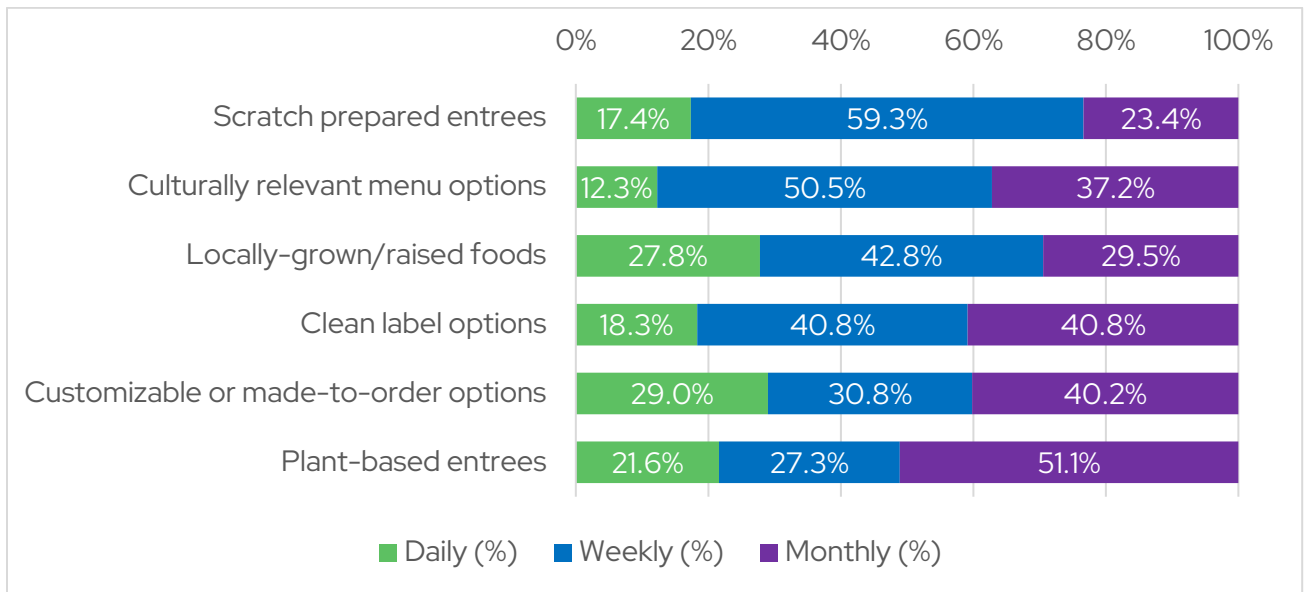
n varies by item: minimum = 1,304 to maximum =1,316.



### Menu Trends

- 76.7% (n = 949) of respondents report their program offers scratch-prepared entrees on a daily or weekly basis. 70.6% (n = 839) of respondents report their program offers locally-grown/raised foods on a daily or weekly basis.
- Respondents from the largest districts (10,000+ students) and from districts with 26% or less free-and-reduced rate reported the highest rates of providing plant-based entrees on a daily or weekly basis.
- Respondents from the Northeast FNS region (44.4%, n = 56) and from districts with less than 26% free-and-reduced rate (36.7%, n = 66) reported the highest rates of providing customizable or made-to-order options.

38. Approximately how often does your program offer the following in reimbursable meals?



n varies by item: minimum = 948 to maximum =1,237.



Appendix A: Please indicate the extent to which the following issues are a challenge for your school meal program: Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment and selected variables

Table A1. Please indicate the extent to which the following issues are a challenge for your school meal program. - Food costs					
	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		2.0%	26.6%	71.3%	1,368
USDA FNS Region**	Mid-Atlantic	2.9%	14.4%	82.7%	104
	Midwest	2.2%	29.5%	68.3%	366
	Mountain Plains	2.4%	26.6%	71.0%	124
	Northeast	2.1%	40.0%	57.9%	145
	Southeast	1.3%	18.8%	79.9%	234
	Southwest	1.1%	24.9%	74.1%	189
	Western	2.9%	28.3%	68.8%	205
Free-and-Reduced%	<26%	1.8%	33.6%	64.6%	223
	26 - 50%	1.8%	26.2%	72.1%	512
	51 - 65%	2.1%	25.9%	72.1%	290
	>65%	2.6%	23.3%	74.1%	343
District Enrollment	<1,000	2.6%	20.8%	76.6%	192
	1,000 - 2,499	1.8%	22.7%	75.5%	326
	2,500 - 4,999	2.0%	27.6%	70.4%	297
	5,000 - 9,999	2.2%	32.2%	65.6%	227
	10,000 - 24,999	1.1%	27.9%	71.1%	190
	25,000+	2.9%	30.9%	66.2%	136

\*\*Chi-square tests of independence showed there are statistically significant associations between FNS Region the rating of the severity of the challenge of food costs by respondents.





Table A2. Please indicate the extent to which the following issues are a challenge for your school meal program. - Labor costs

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		5.1%	38.2%	56.8%	1,365
USDA FNS Region*	Mid-Atlantic	2.9%	44.7%	52.4%	103
	Midwest	5.7%	45.1%	49.2%	368
	Mountain Plains	5.6%	38.7%	55.6%	124
	Northeast	6.2%	44.1%	49.7%	145
	Southeast	3.9%	29.6%	66.5%	233
	Southwest	6.4%	32.6%	61.0%	187
	Western	3.9%	32.7%	63.4%	205
Free-and-Reduced%	<26%	5.8%	42.2%	52.0%	223
	26 - 50%	4.3%	40.2%	55.5%	510
	51 - 65%	6.2%	34.8%	59.0%	290
	>65%	4.7%	35.6%	59.8%	343
District Enrollment*	<1,000	5.7%	42.7%	51.6%	192
	1,000 - 2,499	6.8%	38.9%	54.3%	324
	2,500 - 4,999	3.4%	43.2%	53.4%	296
	5,000 - 9,999	5.3%	39.2%	55.5%	227
	10,000 - 24,999	4.2%	31.6%	64.2%	190
	25,000+	4.4%	27.0%	68.6%	137

\*Chi-square tests of independence showed there are statistically significant associations between FNS Region ( $p = .003$ ) and District Enrollment size ( $p = .020$ ), and the rating of the severity of the challenge of labor costs by respondents.



Table A3. Please indicate the extent to which the following issues are a challenge for your school meal program. -  
Equipment costs

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		8.6%	46.8%	44.6%	1,364
USDA FNS Region*	Mid-Atlantic	4.8%	48.1%	47.1%	104
	Midwest	11.9%	46.9%	41.2%	369
	Mountain Plains	10.4%	52.0%	37.6%	125
	Northeast	8.4%	51.7%	39.9%	143
	Southeast	6.9%	37.7%	55.4%	231
	Southwest	7.4%	46.6%	46.0%	189
	Western	6.4%	50.2%	43.3%	203
Free-and-Reduced%	<26%	9.4%	52.0%	38.6%	223
	26 - 50%	9.2%	46.8%	44.0%	509
	51 - 65%	9.4%	46.7%	43.9%	287
	>65%	6.4%	43.9%	49.7%	346
District Enrollment	<1,000	7.2%	47.2%	45.6%	195
	1,000 - 2,499	8.6%	43.1%	48.3%	325
	2,500 - 4,999	7.8%	49.0%	43.2%	294
	5,000 - 9,999	8.0%	46.2%	45.8%	225
	10,000 - 24,999	7.4%	50.5%	42.1%	195
	25,000+	14.7%	47.1%	38.2%	136

\*A chi-square test of independence showed there is a statistically significant association between FNS Region and the rating of the severity of the challenge of equipment costs by respondents.  $p = .016$ .



Table A4. Please indicate the extent to which the following issues are a challenge for your school meal program. - Staff shortages

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		11.3%	40.3%	48.4%	1,370
USDA FNS Region	Mid-Atlantic	5.8%	34.6%	59.6%	104
	Midwest	12.4%	43.0%	44.6%	370
	Mountain Plains	13.6%	45.6%	40.8%	125
	Northeast	8.4%	39.9%	51.7%	143
	Southeast	10.3%	34.6%	55.1%	234
	Southwest	11.1%	42.9%	46.0%	189
	Western	14.1%	39.5%	46.3%	205
Free-and-Reduced%	<26%	8.1%	44.8%	47.1%	223
	26 - 50%	12.9%	38.8%	48.2%	510
	51 - 65%	10.3%	42.1%	47.6%	292
	>65%	11.8%	38.2%	50.0%	346
District Enrollment*	<1,000	19.1%	36.6%	44.3%	194
	1,000 - 2,499	10.7%	42.8%	46.5%	327
	2,500 - 4,999	11.1%	40.2%	48.6%	296
	5,000 - 9,999	10.1%	43.2%	46.7%	227
	10,000 - 24,999	7.3%	40.3%	52.4%	191
	25,000+	9.6%	35.3%	55.1%	136

\*A chi-square test of independence showed there is a statistically significant association between district enrollment size and the rating of the severity of staff shortages by respondents.  $p = .038$ .



Table A5. Please indicate the extent to which the following issues are a challenge for your school meal program. - Availability of menu items that meet current nutrition standards (e.g. whole-grain, low-sodium, low-fat)

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		13.7%	56.1%	30.3%	1,368
USDA FNS Region	Mid-Atlantic	18.3%	54.8%	26.9%	104
	Midwest	14.6%	55.8%	29.5%	369
	Mountain Plains	15.3%	62.9%	21.8%	124
	Northeast	13.3%	55.2%	31.5%	143
	Southeast	15.9%	52.4%	31.8%	233
	Southwest	7.4%	58.7%	33.9%	189
	Western	12.1%	55.3%	32.5%	206
Free-and-Reduced%	<26%	13.8%	58.0%	28.1%	224
	26 - 50%	14.9%	57.1%	28.0%	511
	51 - 65%	12.1%	58.3%	29.7%	290
	>65%	13.4%	51.2%	35.5%	344
District Enrollment	<1,000	10.8%	56.7%	32.5%	194
	1,000 - 2,499	11.0%	56.4%	32.5%	326
	2,500 - 4,999	15.5%	53.2%	31.3%	297
	5,000 - 9,999	16.4%	55.1%	28.4%	225
	10,000 - 24,999	13.6%	59.2%	27.2%	191
	25,000+	16.2%	57.4%	26.5%	136



Table A6. Please indicate the extent to which the following issues are a challenge for your school meal program. - Getting families to submit free-and-reduced meal applications/household income forms

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		30.1%	35.7%	34.2%	1,359
USDA FNS Region**	Mid-Atlantic	47.6%	27.2%	25.2%	103
	Midwest	15.5%	42.7%	41.8%	368
	Mountain Plains	12.2%	41.5%	46.3%	123
	Northeast	39.0%	28.4%	32.6%	141
	Southeast	46.8%	28.6%	24.7%	231
	Southwest	29.8%	34.6%	35.6%	188
	Western	33.7%	38.0%	28.3%	205
Free-and-Reduced%**	<26%	12.3%	42.9%	44.7%	219
	26 - 50%	18.1%	41.1%	40.9%	509
	51 - 65%	33.7%	37.5%	28.9%	291
	>65%	56.6%	21.4%	22.0%	341
District Enrollment	<1,000	25.4%	44.6%	30.1%	193
	1,000 - 2,499	30.2%	32.7%	37.0%	324
	2,500 - 4,999	33.1%	32.4%	34.5%	293
	5,000 - 9,999	34.5%	31.8%	33.6%	223
	10,000 - 24,999	26.7%	39.3%	34.0%	191
	25,000+	27.9%	38.2%	33.8%	136
All Meals Free Status**	All Meals Not Free	7.3%	47.6%	45.1%	603
	All Meals Free	48.4%	26.1%	25.5%	754

\*\*Chi-square tests of independence showed there are statistically significant associations between FNS Region, Free-and-Reduced%, and All Meals Free Status, and the rating of the severity of the challenge of getting families to submit free-and-reduced meal applications/household income forms.



Table A7. Please indicate the extent to which the following issues are a challenge for your school meal program. - Procurement issues (e.g., long lead times, substitutions, late deliveries, insufficient bid responses)

	Overall	Not a Challenge	Moderate Challenge	Significant Challenge	n
		13.1%	49.9%	37.0%	1,362
USDA FNS Region**	Mid-Atlantic	10.6%	48.1%	41.3%	104
	Midwest	17.7%	56.1%	26.2%	367
	Mountain Plains	14.4%	50.4%	35.2%	125
	Northeast	12.7%	50.7%	36.6%	142
	Southeast	13.9%	46.5%	39.6%	230
	Southwest	9.5%	46.3%	44.2%	190
	Western	8.3%	45.6%	46.1%	204
Free-and-Reduced%	<26%	12.2%	54.3%	33.5%	221
	26 - 50%	13.7%	50.8%	35.5%	512
	51 - 65%	13.6%	50.5%	35.9%	287
	>65%	12.8%	44.9%	42.3%	343
District Enrollment*	<1,000	19.6%	49.5%	30.9%	194
	1,000 - 2,499	14.8%	55.7%	29.5%	325
	2,500 - 4,999	13.3%	44.6%	42.2%	294
	5,000 - 9,999	12.1%	49.6%	38.4%	224
	10,000 - 24,999	9.5%	49.5%	41.1%	190
	25,000+	7.4%	48.5%	44.1%	136

\*\*A chi-square tests of independence showed there are statistically significant associations between FNS Region and the rating of the severity of the challenge of procurement issues (e.g., long lead times, substitutions, late deliveries, insufficient bid responses).

\*A chi-square tests of independence showed there are statistically significant associations between district enrollment size and the rating of the severity of the challenge of procurement issues (e.g., long lead times, substitutions, late deliveries, insufficient bid responses).



*Appendix B – In April 2024, USDA published a final rule to update federal school nutrition standards. What is your level of concern about meeting each of the following requirements under this rule?: Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment<sup>7</sup>*

B1. In April 2024, USDA published a final rule to update federal school nutrition standards.					
What is your level of concern about meeting each of the following requirements under this rule?					
Beginning July 1, 2025, new product-based added sugar limits for: Breakfast cereals : ≤ 6 g/oz					
	Overall	Serious concern	Moderate Challenge	Not a Concern	n
		39.6%	42.9%	17.5%	1,335
USDA FNS Region*	Mid-Atlantic	36.6%	49.5%	13.9%	101
	Midwest	42.3%	38.3%	19.4%	355
	Mountain Plains	26.7%	50.0%	23.3%	120
	Northeast	36.4%	48.6%	15.0%	140
	Southeast	49.6%	36.7%	13.7%	226
	Southwest	39.8%	45.7%	14.5%	186
	Western	35.4%	44.2%	20.4%	206
Free-and-Reduced%	<26%	33.5%	43.6%	22.9%	218
	26 - 50%	41.3%	41.9%	16.8%	494
	51 - 65%	39.4%	44.0%	16.5%	284
	>65%	41.3%	43.1%	15.6%	339
District Enrollment	<1,000	41.3%	41.8%	16.9%	189
	1,000 - 2,499	44.7%	43.1%	12.2%	320
	2,500 - 4,999	42.0%	40.7%	17.3%	295
	5,000 - 9,999	34.2%	42.9%	22.8%	219
	10,000 - 24,999	37.5%	44.0%	18.5%	184
	25,000+	31.3%	47.7%	21.1%	128
*A chi-square test of independence showed there is a statistically significant association between FNS region and reported level of concern about meeting the July 1, 2025, new product-based added-sugar limits for breakfast cereals: ≤ 6 g/oz. p = .004.					

<sup>7</sup> The wording of this question in the survey that respondents took read, "In January 2024..." in error. This error has been corrected in this report.



B2. In April 2024, USDA published a final rule to update federal school nutrition standards.

What is your level of concern about meeting each of the following requirements under this rule?

Beginning July 1, 2025, new product-based added sugar limits for: Yogurt: ≤12 g/6 oz

	Overall	Serious concern	Moderate Challenge	Not a Concern	n
		32.8%	47.3%	20.0%	1,337
USDA FNS Region	Mid-Atlantic	23.8%	53.5%	22.8%	101
	Midwest	36.8%	43.3%	19.9%	356
	Mountain Plains	20.8%	52.5%	26.7%	120
	Northeast	32.9%	50.0%	17.1%	140
	Southeast	37.9%	45.4%	16.7%	227
	Southwest	32.8%	51.1%	16.1%	186
	Western	31.6%	45.1%	23.3%	206
Free-and-Reduced%	<26%	31.5%	42.5%	26.0%	219
	26 - 50%	32.7%	48.8%	18.5%	496
	51 - 65%	30.7%	48.4%	20.8%	283
	>65%	35.4%	47.2%	17.4%	339
District Enrollment*	<1,000	37.2%	48.2%	14.7%	191
	1,000 - 2,499	34.8%	50.2%	15.0%	319
	2,500 - 4,999	32.2%	45.8%	22.0%	295
	5,000 - 9,999	31.1%	44.3%	24.7%	219
	10,000 - 24,999	32.6%	48.9%	18.5%	184
	25,000+	25.6%	45.0%	29.5%	129

\*Chi-square tests of independence showed there are statistically significant associations between district enrollment and reported level of concern for July 1, 2025, new product-based added sugar limits for: Yogurt: ≤12 g/6 oz.





B3. In April 2024, USDA published a final rule to update federal school nutrition standards.

What is your level of concern about meeting each of the following requirements under this rule?

Beginning July 1, 2025, new product-based added sugar limits for: Flavored milk:  $\leq 10\text{g}/8\text{ oz}$  or  $15\text{ g}/12\text{ oz}$

	Overall	Serious concern	Moderate Challenge	Not a Concern	n
		41.4%	37.0%	21.6%	1,332
USDA FNS Region**	Mid-Atlantic	40.0%	42.0%	18.0%	100
	Midwest	41.2%	36.4%	22.4%	356
	Mountain Plains	36.7%	38.3%	25.0%	120
	Northeast	35.5%	42.8%	21.7%	138
	Southeast	58.8%	27.0%	14.2%	226
	Southwest	40.5%	41.1%	18.4%	185
	Western	30.7%	38.5%	30.7%	205
Free-and-Reduced%*	<26%	34.9%	33.9%	31.2%	218
	26 - 50%	42.7%	36.0%	21.3%	494
	51 - 65%	42.0%	37.8%	20.1%	283
	>65%	43.0%	39.8%	17.2%	337
District Enrollment	<1,000	44.0%	40.8%	15.2%	191
	1,000 - 2,499	45.5%	35.1%	19.4%	319
	2,500 - 4,999	41.3%	36.9%	21.8%	293
	5,000 - 9,999	39.0%	38.1%	22.9%	218
	10,000 - 24,999	38.0%	37.5%	24.5%	184
	25,000+	36.2%	33.9%	29.9%	127

\*\*A chi-square test of independence showed there is a statistically significant association between FNS Region and the rating of the level of concern regarding the July 1, 2025, new product-based added sugar limits for: Flavored milk:  $\leq 10\text{g}/8\text{ oz}$  or  $15\text{ g}/12\text{ oz}$ .

\*A chi-square test of independence showed there is a statistically significant association between free-and-reduced % and the rating of the level of concern regarding the July 1, 2025, new product-based added sugar limits for: Flavored milk:  $\leq 10\text{g}/8\text{ oz}$  or  $15\text{ g}/12\text{ oz}$ .



B4. In April 2024, USDA published a final rule to update federal school nutrition standards.

What is your level of concern about meeting each of the following requirements under this rule?

In addition to product-based limits, beginning July 1, 2027, limit added sugars to <10% of calories per week in school lunch and breakfast.

	Overall	Serious concern	Moderate Challenge	Not a Concern	n
		64.6%	31.1%	4.3%	1,338
USDA FNS Region**	Mid-Atlantic	66.3%	32.7%	1.0%	101
	Midwest	64.7%	32.8%	2.5%	357
	Mountain Plains	60.8%	35.8%	3.3%	120
	Northeast	52.1%	42.1%	5.7%	140
	Southeast	75.3%	18.9%	5.7%	227
	Southwest	66.1%	29.6%	4.3%	186
	Western	61.7%	32.0%	6.3%	206
Free-and-Reduced %*	<26%	56.2%	40.2%	3.7%	219
	26 - 50%	64.7%	31.7%	3.6%	496
	51 - 65%	66.2%	27.5%	6.3%	284
	>65%	68.7%	27.4%	3.8%	339
District Enrollment*	<1,000	63.4%	33.5%	3.1%	191
	1,000 - 2,499	70.6%	25.6%	3.8%	320
	2,500 - 4,999	65.1%	32.9%	2.0%	295
	5,000 - 9,999	63.9%	30.1%	5.9%	219
	10,000 - 24,999	62.5%	31.0%	6.5%	184
	25,000+	55.0%	38.8%	6.2%	129

\*\*A chi-square test of independence showed there is a statistically significant association between FNS Region and the rating of the level of concern regarding the July 1, 2027, limit added sugars to <10% of calories per week in school lunch and breakfast.

\*A chi-square test of independence showed there is a statistically significant association between free-and-reduced % (p = .016), district enrollment (p = .040), and the rating of the level of concern regarding the July 1, 2027, limit added sugars to <10% of calories per week in school lunch and breakfast.



B5. In April 2024, USDA published a final rule to update federal school nutrition standards.

What is your level of concern about meeting each of the following requirements under this rule?

Beginning July 1, 2027, meet sodium limits that mirror Target 2 (a 10% reduction for breakfast and 15% for lunch)

	Overall	Serious concern	Moderate Challenge	Not a Concern	n
		78.6%	19.1%	2.2%	1,339
USDA FNS Region*	Mid-Atlantic	77.2%	20.8%	2.0%	101
	Midwest	80.4%	17.9%	1.7%	357
	Mountain Plains	71.7%	26.7%	1.7%	120
	Northeast	72.1%	23.6%	4.3%	140
	Southeast	86.4%	11.4%	2.2%	228
	Southwest	81.2%	17.2%	1.6%	186
	Western	74.3%	23.3%	2.4%	206
Free-and-Reduced%*	<26%	73.1%	25.6%	1.4%	219
	26 - 50%	78.1%	20.1%	1.8%	497
	51 - 65%	82.7%	14.1%	3.2%	284
	>65%	79.6%	17.7%	2.7%	339
District Enrollment	<1,000	73.8%	24.1%	2.1%	191
	1,000 - 2,499	83.1%	15.0%	1.9%	320
	2,500 - 4,999	80.3%	18.3%	1.4%	295
	5,000 - 9,999	74.9%	21.9%	3.2%	219
	10,000 - 24,999	79.9%	17.9%	2.2%	184
	25,000+	75.4%	20.8%	3.8%	130

\*A chi-square test of independence showed there is a statistically significant association between FNS region ( $p = .031$ ), free-and-reduced % ( $p = .040$ ), and the rating of the level of concern regarding the July 1, 2027, meet sodium limits that mirror Target 2 (a 10% reduction for breakfast and 15% for lunch).



*Appendix C – Please indicate your program’s need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar:  
Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment*

C1. Please indicate your program’s need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: More equipment					
	Overall	Extreme Need	Moderate Need	No Need	n
		25.9%	53.3%	20.8%	1,329
USDA FNS Region**	Mid-Atlantic	26.7%	52.5%	20.8%	101
	Midwest	20.6%	53.7%	25.7%	354
	Mountain Plains	20.0%	51.7%	28.3%	120
	Northeast	25.0%	50.7%	24.3%	140
	Southeast	30.7%	53.3%	16.0%	225
	Southwest	23.9%	60.9%	15.2%	184
	Western	35.3%	48.5%	16.2%	204
Free-and-Reduced%	<26%	22.8%	53.9%	23.3%	219
	26 - 50%	25.1%	53.9%	21.0%	495
	51 - 65%	27.8%	49.5%	22.8%	281
	>65%	27.5%	55.1%	17.4%	334
District Enrollment	<1,000	29.3%	52.4%	18.3%	191
	1,000 - 2,499	24.6%	52.7%	22.7%	313
	2,500 - 4,999	23.5%	57.0%	19.5%	293
	5,000 - 9,999	26.0%	53.9%	20.1%	219
	10,000 - 24,999	29.0%	47.5%	23.5%	183
	25,000+	24.6%	54.6%	20.8%	130

\*\*A chi-square test of independence showed there is a statistically significant association between FNS Region and the rating of the need for more equipment.



C2. Please indicate your program's need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: Additional staff

	Overall	Extreme Need	Moderate Need	No Need	n
		34.1%	45.6%	20.2%	1,330
USDA FNS Region*	Mid-Atlantic	40.6%	46.5%	12.9%	101
	Midwest	27.3%	47.3%	25.4%	355
	Mountain Plains	29.4%	47.9%	22.7%	119
	Northeast	37.9%	50.0%	12.1%	140
	Southeast	41.1%	39.7%	19.2%	224
	Southwest	34.4%	44.6%	21.0%	186
	Western	35.3%	45.6%	19.1%	204
Free-and-Reduced%	<26%	30.9%	50.0%	19.1%	220
	26 - 50%	36.3%	44.0%	19.8%	491
	51 - 65%	30.7%	48.8%	20.5%	283
	>65%	36.0%	42.6%	21.4%	336
District Enrollment**	<1,000	28.6%	41.3%	30.2%	189
	1,000 - 2,499	30.5%	50.0%	19.5%	318
	2,500 - 4,999	35.3%	46.9%	17.8%	292
	5,000 - 9,999	30.9%	50.7%	18.4%	217
	10,000 - 24,999	38.6%	42.9%	18.5%	184
	25,000+	47.7%	33.8%	18.5%	130

\*A chi-square test of independence showed there is a statistically significant association between FNS Region and the rating of the need for additional staff.  $p = .011$ .

\*\*A chi-square test of independence showed there is a statistically significant association between district enrollment and the rating of the need for additional staff.



C3. Please indicate your program's need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: Additional pre-prepared menu options with less sugar/sodium

	Overall	Extreme Need	Moderate Need	No Need	n
		55.0%	36.7%	8.3%	1,335
USDA FNS Region	Mid-Atlantic	54.5%	35.6%	9.9%	101
	Midwest	55.2%	35.9%	9.0%	357
	Mountain Plains	51.3%	37.8%	10.9%	119
	Northeast	52.5%	39.7%	7.8%	141
	Southeast	63.0%	30.8%	6.2%	227
	Southwest	57.0%	36.6%	6.5%	186
	Western	48.3%	42.9%	8.9%	203
Free-and-Reduced%	<26%	52.3%	35.9%	11.8%	220
	26 - 50%	55.4%	37.0%	7.7%	495
	51 - 65%	56.5%	35.0%	8.5%	283
	>65%	54.9%	38.3%	6.8%	337
District Enrollment*	<1,000	54.5%	34.6%	11.0%	191
	1,000 - 2,499	61.1%	33.9%	5.0%	319
	2,500 - 4,999	58.0%	34.8%	7.2%	293
	5,000 - 9,999	54.1%	34.4%	11.5%	218
	10,000 - 24,999	46.4%	46.4%	7.1%	183
	25,000+	47.3%	41.2%	11.5%	131

\*A chi-square test of independence showed there is a statistically significant association between district enrollment and the rating of the need for additional pre-prepared menu options with less sugar/sodium  $p = .007$ .



C4. Please indicate your program's need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: Increased funding

	Overall	Extreme Need	Moderate Need	No Need	n
		69.5%	27.3%	3.2%	1,332
USDA FNS Region**	Mid-Atlantic	67.3%	30.7%	2.0%	101
	Midwest	63.9%	32.2%	3.9%	357
	Mountain Plains	67.5%	29.2%	3.3%	120
	Northeast	59.4%	36.2%	4.3%	138
	Southeast	82.1%	16.1%	1.8%	224
	Southwest	75.1%	23.2%	1.6%	185
	Western	69.9%	25.7%	4.4%	206
Free-and-Reduced%	<26%	64.4%	31.1%	4.6%	219
	26 - 50%	71.0%	26.2%	2.8%	496
	51 - 65%	72.1%	25.1%	2.8%	283
	>65%	68.6%	28.1%	3.3%	334
District Enrollment	<1,000	70.4%	26.5%	3.2%	189
	1,000 - 2,499	68.7%	28.2%	3.1%	319
	2,500 - 4,999	66.0%	31.3%	2.7%	294
	5,000 - 9,999	67.3%	29.0%	3.7%	217
	10,000 - 24,999	73.8%	23.5%	2.7%	183
	25,000+	76.2%	19.2%	4.6%	130

\*\*A chi-square test of independence showed there is a statistically significant association between FNS region and the rating of the need for increased funding.



C5. Please indicate your program's need for increased resources in the following categories to achieve compliance with forthcoming limits on sodium and sugar: More staff training

	Overall	Extreme Need	Moderate Need	No Need	n
		40.6%	50.5%	8.9%	1,331
USDA FNS Region*	Mid-Atlantic	45.5%	47.5%	6.9%	101
	Midwest	35.9%	54.4%	9.7%	351
	Mountain Plains	24.6%	61.0%	14.4%	118
	Northeast	44.7%	50.4%	5.0%	141
	Southeast	50.2%	41.0%	8.8%	227
	Southwest	40.3%	51.1%	8.6%	186
	Western	42.7%	49.0%	8.3%	206
Free-and-Reduced%*	<26%	39.2%	52.5%	8.3%	217
	26 - 50%	35.2%	55.6%	9.3%	495
	51 - 65%	45.0%	46.5%	8.5%	282
	>65%	46.0%	45.1%	8.9%	337
District Enrollment	<1,000	40.5%	45.8%	13.7%	190
	1,000 - 2,499	38.9%	52.5%	8.5%	316
	2,500 - 4,999	39.4%	55.5%	5.1%	292
	5,000 - 9,999	45.9%	44.5%	9.6%	218
	10,000 - 24,999	40.2%	51.1%	8.7%	184
	25,000+	39.7%	50.4%	9.9%	131

\*A chi-square test of independence showed there is a statistically significant association between FNS region ( $p = .002$ ), free-and-reduced % ( $p = .039$ ) and the rating of the need for more staff training.





*Appendix D – Approximately how often does your program offer the following in reimbursable meals? – Disaggregated by USDA FNS region, Free-and-Reduced Rate, and District Enrollment*

D1. Approximately how often does your program offer the following in reimbursable meals? – Scratch prepared entrees					
	Overall	Daily	Weekly	Monthly	n
		17.4%	59.3%	23.4%	1,237
USDA FNS Region**	Mid-Atlantic	14.1%	46.7%	39.1%	92
	Midwest	14.0%	57.6%	28.3%	321
	Mountain Plains	16.1%	66.1%	17.9%	112
	Northeast	21.0%	52.2%	26.8%	138
	Southeast	11.5%	64.4%	24.0%	208
	Southwest	20.8%	63.1%	16.1%	168
	Western	25.4%	60.4%	14.2%	197
Free-and-Reduced%	<26%	17.6%	54.9%	27.5%	204
	26 - 50%	16.3%	63.0%	20.7%	460
	51 - 65%	14.1%	59.9%	26.0%	269
	>65%	21.7%	55.9%	22.4%	304
District Enrollment*	<1,000	22.0%	62.6%	15.4%	182
	1,000 - 2,499	13.7%	65.1%	21.2%	292
	2,500 - 4,999	14.8%	58.5%	26.7%	277
	5,000 - 9,999	20.5%	52.0%	27.5%	200
	10,000 - 24,999	19.2%	59.3%	21.6%	167
	25,000+	17.6%	53.8%	28.6%	119
<p>**A chi-square test of independence showed there is a statistically significant association between FNS region and the frequency of offering scratch-prepared entrees.</p> <p>*A chi-square test of independence showed there is a statistically significant association between district enrollment and the frequency of offering scratch-prepared entrees. p = .019.</p>					



D2. Approximately how often does your program offer the following in reimbursable meals? - Culturally relevant menu options

	Overall	Daily	Weekly	Monthly	n
		12.3%	50.5%	37.2%	1,153
USDA FNS Region**	Mid-Atlantic	11.9%	52.4%	35.7%	84
	Midwest	11.6%	45.2%	43.2%	294
	Mountain Plains	9.1%	51.5%	39.4%	99
	Northeast	5.9%	43.0%	51.1%	135
	Southeast	8.4%	55.3%	36.3%	190
	Southwest	17.6%	56.4%	26.1%	165
	Western	18.9%	53.0%	28.1%	185
Free-and-Reduced%*	<26%	14.6%	45.2%	40.2%	199
	26 - 50%	10.2%	49.9%	39.9%	421
	51 - 65%	10.0%	50.8%	39.2%	240
	>65%	15.7%	54.6%	29.7%	293
District Enrollment**	<1,000	9.4%	36.9%	53.7%	149
	1,000 - 2,499	10.5%	42.5%	47.0%	266
	2,500 - 4,999	8.3%	52.8%	39.0%	254
	5,000 - 9,999	16.6%	54.4%	29.0%	193
	10,000 - 24,999	14.1%	60.0%	25.9%	170
	25,000+	19.0%	60.3%	20.7%	121

\*\*A chi-square test of independence showed there is a statistically significant association between FNS region, district enrollment, and the frequency of offering culturally-relevant menu options.

\*A chi-square test of independence showed there is a statistically significant association between free-and-reduced % and the frequency of offering culturally-relevant menu options.



D3. Approximately how often does your program offer the following in reimbursable meals? - Plant-based entrees

	Overall	Daily	Weekly	Monthly	n
		21.6%	27.3%	51.1%	948
USDA FNS Region*	Mid-Atlantic	23.0%	33.8%	43.2%	74
	Midwest	20.3%	21.1%	58.6%	256
	Mountain Plains	23.9%	18.3%	57.7%	71
	Northeast	25.6%	33.3%	41.1%	129
	Southeast	17.3%	25.9%	56.8%	139
	Southwest	17.2%	29.5%	53.3%	122
	Western	26.1%	33.1%	40.8%	157
Free-and-Reduced%*	<26%	30.8%	23.8%	45.3%	172
	26 - 50%	22.0%	26.7%	51.3%	345
	51 - 65%	18.0%	31.1%	51.0%	206
	>65%	17.3%	27.6%	55.1%	225
District Enrollment**	<1,000	15.3%	21.6%	63.1%	111
	1,000 - 2,499	15.4%	24.8%	59.8%	214
	2,500 - 4,999	22.4%	22.4%	55.2%	210
	5,000 - 9,999	20.4%	25.7%	53.9%	167
	10,000 - 24,999	30.9%	36.0%	33.1%	139
	25,000+	29.0%	39.3%	31.8%	107

\*A chi-square test of independence showed there is a statistically significant association between FNS region ( $p = .007$ ), free-and-reduced % ( $p = .034$ ) and the frequency of offering plant-based entrees.

\*\*A Chi-square test of independence showed there is a statistically significant association between district enrollment and the frequency of offering plant-based entrees.



D4. Approximately how often does your program offer the following in reimbursable meals? - Customizable or made-to-order options

	Overall	Daily	Weekly	Monthly	n
		29.0%	30.8%	40.2%	969
USDA FNS Region**	Mid-Atlantic	36.4%	27.3%	36.4%	77
	Midwest	32.2%	34.4%	33.3%	270
	Mountain Plains	25.0%	27.6%	47.4%	76
	Northeast	44.4%	27.0%	28.6%	126
	Southeast	18.9%	28.3%	52.8%	159
	Southwest	25.9%	33.0%	41.1%	112
	Western	21.5%	31.5%	47.0%	149
Free-and-Reduced%*	<26%	36.7%	27.2%	36.1%	180
	26 - 50%	31.9%	33.0%	35.1%	342
	51 - 65%	26.2%	32.5%	41.3%	206
	>65%	21.6%	28.6%	49.8%	241
District Enrollment	<1,000	25.6%	30.2%	44.2%	129
	1,000 - 2,499	28.8%	27.5%	43.8%	233
	2,500 - 4,999	31.9%	31.5%	36.6%	216
	5,000 - 9,999	35.8%	24.8%	39.4%	165
	10,000 - 24,999	24.2%	39.4%	36.4%	132
	25,000+	22.3%	36.2%	41.5%	94

\*\*A chi-square test of independence showed there is a statistically significant association between FNS region and the frequency of offering customizable or made-to-order options.

\*A chi-square test of independence showed there is a statistically significant association between free-and-reduced % (p = .003) and the frequency of offering customizable or made-to-order options.



D5. Approximately how often does your program offer the following in reimbursable meals? - Clean label options

	Overall	Daily	Weekly	Monthly	n
		18.3%	40.8%	40.8%	999
USDA FNS Region	Mid-Atlantic	16.5%	49.4%	34.2%	79
	Midwest	21.5%	40.4%	38.1%	260
	Mountain Plains	19.8%	33.7%	46.5%	86
	Northeast	13.3%	43.3%	43.3%	120
	Southeast	17.8%	38.0%	44.2%	163
	Southwest	15.1%	39.7%	45.2%	126
	Western	19.5%	43.3%	37.2%	164
Free-and-Reduced%	<26%	25.6%	37.8%	36.6%	172
	26 - 50%	18.9%	40.8%	40.3%	360
	51 - 65%	14.2%	39.9%	45.9%	218
	>65%	16.1%	43.8%	40.2%	249
District Enrollment	<1,000	15.7%	38.1%	46.3%	134
	1,000 - 2,499	15.5%	44.2%	40.3%	226
	2,500 - 4,999	16.0%	38.7%	45.3%	225
	5,000 - 9,999	21.5%	39.5%	39.0%	172
	10,000 - 24,999	22.3%	38.8%	38.8%	139
	25,000+	22.3%	46.6%	31.1%	103



*Appendix E - Which of the following concerns do you have regarding the non-domestic food purchases cap? – Open-Ended Responses*

Which of the following concerns do you have regarding the non-domestic food purchases cap?
All of these- this is yet another unfunded administrative burden on child nutrition programs.
All the new regulations are very restrictive. The more restrictions the less flexibility we have. This will amount to serving things like bananas, broccoli, grapes, melons and berries, once a month by SY 32? All very popular and are served weekly. Of course this is not a complete list but these are all being served fresh at this time. I for see availability becoming more of an issue. We may have no choice but to start serving more frozen produce. Another thing to track as well.
Almost all Juice comes from China
Availability of spices
breakfast fruit cups and Juices are not always made in US and are harder to bring in at a reasonable cost
Common items will not be able to be served, e.g. apple juice
Current prime vendor does not have any transparency in the ordering system regarding where the produce is currently being sourced from so it's hard to make decisions on what to purchase. I'm very concerned about cost and nutrient value and variety if being capped.
District size makes it difficult to source locally grown produce in sufficient quantities. The amount of work it takes for local procurement for each farm/farmer is not possible or sustainable for a program our size. I am 100% behind increasing the sustainability of our programs, but I think we need to be allowed to use our USDA foods entitlement dollar for dollar and spend w/ local farms. If we can divert to food corporations, we should be able to spend our entitlement locally with our local farmers.
Eliminates student favorite fresh fruit items such as pineapple, bananas, mandarin oranges, etc.
Even our vendors can't tell us from week to week where the produce will come from
FF&Veg program is an educational program. How much education is necessary for apples, oranges and bananas? New and different things are not available in the USA most times and yet the nutritional benefits are there.
FFVP produce is factored into the limits.
FFVP will have limited options
How to track fresh produce when sometimes it comes from USA and other times it's Mexico. Price gouging - juice USA brand \$.30 each non domestic juice \$.18 each.
I have an amazing FFVP program for our students = this is going to limit what I can do for them. It is our job to introduce children to different fruits and vegetables - giving them experiences, food knowledge, we are being limited to do the "fun" things with kids and being forced to be "basic".



I love using domestic foods but the funding needs to be increased to be able to afford domestic food purchases.
I needed to key in somewhere that I have 6-7 staff members that will be retiring in the next one or two years. That is almost 1/2 of my staff!
I understand and agree with buying American but I do not believe American only will be able to meet the supply and demand of these changes.
If it's necessary to increase the focus in Buy American we should have better programs for DOD produce so we're not just purchasing apples and pears every week. Also pineapple and bananas are the kids favorite! We wont limit kids based on geography.
If you keep taking away flavor at some point manufacturers are going to pull out of K12. Too many regulations to follow that keep changing. All that this has accomplished is more paperwork, no time to train for scratch cooking. Which we used to do mostly scratch cooking because we didn't have to worry about calories or sodium. Student enjoyed our meals, we produced less pre-packaged processed meals. Kids need calories and fat to develop their brains. Most families do not cook from scratch. So students were able to eat a true homecooked meal at school that tasted and looked appetizing.
In KS, 95% of produce comes from elsewhere, when there is a potential dock strike where food comes in, we worry we won't get produce. Also worry how state interpretation of this rule will cause administrative burden
In the volume we purchase, one item will meet the cap.
Inconsistent sourcing by supplier; don't know what will be delivered
Increasing difficulty collecting documentation from vendors/ distributors.
Is it only for fresh fruits and vegetables? The language is not clear.
It is not broadly stated when ordering if a product comes from outside of the US. It's very hard to tell until a product actually arrives.
It will be a large burden to track the purchases by domestic and non-domestic. I wonder if there could be some lee-way given for non-domestic purchases that owned by companies from the USA?
It will force me to retire to many regulations and rules it continues to be an oversight nightmare with constant changes and challenges!!
Limit options and Limit variety are the same thing. Having another hoop to jump through, data to track is the true hardship! And if it comes to not offering certain fruits or veggies because of the mandated limit, it is a loss for the students we serve.
Limited support from vendors to provide the necessary information in a timely manner
Living in the middle of the country harder to get certain things during sprecific times
Menus will be limited.
More wasted time when I could be working with my staff.
My concern with the non-domestic food purchases cap is whether products that are not readily available domestically, either because they are not grown here or are not produced in sufficient quantities, will qualify for exceptions. Ensuring access to fresh, high-quality products



<p>is paramount, and limiting these purchases could drive up costs or compromise freshness, especially when domestic alternatives are not feasible.</p>
<p>No more bananas for breakfast</p>
<p>not sure</p>
<p>Our students like bananas and we purchase bananas at all campuses a couple of times per week. Although they are inexpensive, they are likely more than 5% of our total spend (produce) due to the quantity that we purchase. We also purchase canned mandarin oranges and the students enjoy those. They are not coming in regularly at this time though.</p>
<p>Our students LOVE bananas, kiwi and avocados. We are also trying to source more cultural food for our students</p>
<p>Produce variety will be a thing of the past. The burden of tracking this will be immense.</p>
<p>Produce vendors need to have the option to import to meet our menu needs when there are no domestic crops available. We are required to use standardized recipes for our menu items, how can we do that if we can't get products in recipes for salads, etc.</p>
<p>Student favorites such as pineapple and bananas would potentially not be allowed</p>
<p>Students like a variety of Fresh fruit and Veggies. Bananas and Pineapple and other fruits are very important to get to off set the ones grown in the USA. Yes I do understand that we need to use them sparingly, however, bananas are good for the kids. They love them.</p>
<p>Supporting Documents</p>
<p>The additional administrative burden. USDA should be able to document what is available and what is not available domestically. Additionally, how will the government ensure that schools have access? We export so much food for profit!!!</p>
<p>The admin work to track these items to prove that we meet the threshold will be taxing</p>
<p>The administrative burden to track this</p>
<p>The increasingly lower cap will limit choices &amp; create needless paperwork</p>
<p>The regulation for knowing what items are domestic vs non-domestic and what percentage of each item is non-domestic needs to be at the National regulation level. If we are expected to track this there needs to be law and regulations that entities that purchase non-domestic items and bring them into the country should be tracking these foods, including what companies (or re-packers) are receiving them. The companies should then have to represent on the product the percentage of non-domestic item in each container. All non-domestic items should be carefully tracked at the national level the health of our children rely on this. Producers and distributors should be regulated to provide the appropriate foods to child nutrition programs. Honestly it is ridiculous to put this on the individual school lunch programs. A cap of 10 percent of our fresh produce from from non-domestic sources is reasonable, but it is truly impossible for us to know what we are really buying when you take into account that currently nothing is mandated to be labeled that it is not grown in this country. Just looking at labels will show nothing, I do not know how we will be audited on something like this.</p>
<p>The rule is not clear and does not provide specifics... 10% of what? Total dollars spent? Pounds purchased?</p>





<p>There are items that the students like - Bananas, Canned Mandarin/Pineapple that the students enjoy and are not available in country. We have several items that are significantly lower cost non domestic, than domestic!</p>
<p>There is only one juice brand/variety (that I am aware of) that is sourced domestically. Juice is a major factor in our grab and go and vended breakfast programs</p>
<p>They want our students to have a variety of foods, but then limit what we can introduce to them. Some of our students may never have some of these items if we don't introduce it to them. And they really like some of them.</p>
<p>This puts not only a burden on our staff to track this, but the students suffer once again, because the limits set will prevent them from enjoying a variety of fruits and vegetables.</p>
<p>This will definitely limit fresh produce options, especially for my school in the northeast. From November until April, we are extremely limited on fresh produce that is US grown, even from other parts of the country. Produce that we can get from US is expensive.</p>
<p>Time taken to track products.</p>
<p>Total</p>
<p>Tremendous burden on common foods that are not available and will greatly impact rural districts</p>
<p>Unrealistic goals of buy American.</p>
<p>We live in Maine, so growing season is limited and availability of products will increase our costs.</p>
<p>We provide items like bananas every week for our students, but have never calculated the %. Items like that could be taken away as choices with this ruling. They along with other items are not grown in the US.</p>
<p>We will have a limited amount of offerings. Not as much variety.</p>
<p>What happen when natural causes effects crops and non domestic is all that is available.</p>
<p>Will limit ingredients that are culturally relevant and support diverse menu options (coconut milk, balsamic, agave, etc).</p>
<p>Will limit juice (juice concentrate is not Buy American) Will limit schools' abilities to provide ethnic/culturally relevant dishes to diverse populations. When student loved fresh produce goes out of season or when natural disasters wipe out farmland (like the citrus groves killed in TX from the devastating freeze) we will just have to remove them from the menu. I foresee in the future, menu planners will need to either be in compliance with buy American OR be in compliance with the vegetable subgroups on their menus because of limited domestic AND subgroup options. They will not always be able to maintain compliance with both.</p>
<p>Will products on the USDA's exempt list count towards the Buy American cap or not? Want &amp; need clarity on this.</p>
<p>Will require using multiple vendors, making procurement &amp; ordering much more complex. Again, more administrative burden.</p>
<p>With the push for global cuisine some items will need to be non-domestic.</p>