

Six Changes USDA Made to Help Schools Serve More Plant-Based Foods

November 2024



Amazing Tofu LoMein, Credit: The Lunchbox

Background

In April 2024, USDA released its updated child nutrition meal patterns, including for school lunch and breakfast. The final rule,¹ along with recent guidance from USDA, includes six changes that make it easier for schools to serve more plant-based foods. As explained in the agency’s summary² of the changes, the intent is to provide more options to students who follow vegetarian or vegan diets.

This fact sheet summarizes these changes and serves as a tool to support schools in implementing the new opportunities. It is important to keep in mind that USDA will continue creating additional guidance for schools to accompany the final rule, so be sure to follow its website³ as well.

What’s Plant-Based, and Why Add or Expand Plant-Based Options?

“Plant-based” entrées contain no animal products or byproducts. These options could also be called “vegan.” In the context of school food, our focus is on adding plant-based entrées that include a protein source, called the Meat/Meat Alternates (M/MA) component (e.g., a black bean burger without egg or cheese, a falafel wrap, or tofu nuggets).

Students and their families are asking for plant-based options at school for a wide variety of reasons, including cultural, ethnic, health, and philosophical reasons. While there are many students who specifically follow plant-based diets and *need* to have plant-based options at school, there are many more students who *prefer* to choose plant-based options some or most¹ of the time. Beyond meeting student demand, adding plant-based options to menus also:

- reduces climate and other environmental impacts, providing climate-conscious students with an opportunity to take action;
- supports healthy diets, better aligning school menus with the *Dietary Guidelines for Americans*;
- boosts economic development;
- fosters inclusive, culturally relevant menus; and
- addresses food insecurity.

For more about the benefits of adding or expanding plant-based options, see [“Plant-Based & Plant-Forward Menus: Good for Kids, Good for the Planet.”](#)

¹ For example, a recent Bloomberg Intelligence Survey found that only 28% of Gen Z respondents reported eating meat on a weekly basis.

Opportunity #1: Provides greater flexibility for school districts to serve beans, peas, and lentils in lunch entrees, which will help to diversify center-of-the-plate protein sources.

- **Our summary:** The final rule allows beans, peas, and lentils offered as the meats/meat alternates meal component to also count toward the weekly pulse vegetable subgroup requirement. This should make it easier to serve beans, peas, and lentils as an entree (M/MA) instead of a side, which often means that kids are more likely to eat these under-consumed, nutritious powerhouse foods. This also will help accommodate students following vegetarian or vegan diets and can reduce the carbon footprint of menus by displacing some animal proteins. Note that beans, peas, and lentils can still be offered as meats/meat alternates or vegetables.
- **The fine print from USDA:** “Under the rule, schools may count beans, peas, and lentils offered as meats/meat alternates at lunch toward the weekly beans, peas, and lentils vegetable subgroup requirement. When offering beans, peas, and lentils as meats/meat alternates, schools may only count those items toward one meal component daily: either the meats/meats alternates component or the vegetables component. When schools offer beans, peas, and lentils as meat alternates, they are still required to offer additional vegetables to meet the daily and weekly vegetable meal component requirements.”⁴



Under the old rules, the black beans in these fajitas would not have credited toward the weekly pulse vegetable requirement because they are offered as a M/MA alongside a different vegetable. However, under the new rules, the black beans in the fajitas *may* count toward the weekly pulse vegetable requirement even if they fulfill the M/MA requirement.

- **Entree recipes for K-12 schools featuring beans, peas, and lentils**

- [Baja Bean Fajitas](#)
- [Enchilada Chili](#)
- [Fiesta Rice and Bean Bowl](#)
- [Kick'n Bean Tacos](#)
- [Ms. Patel's Rajma](#)
- [North African Red Lentils](#)
- [Pasta Fagioli](#)
- [Tuscan Tomato Pie](#)
- [Rockstar Lentil Burger](#)
- [Rainbow Hummus Wraps](#)
- [Rainbow Hummus Bowl](#)

Opportunity #2: Allows bean dips like hummus to be served as a Smart Snack.

- **Our summary:** The new rules add “bean dip” to the list of foods that qualify as Smart Snacks. The term “bean dip” includes hummus, as well as other dips made with beans, peas, and/or lentils.
- **The fine print from USDA:** “The final rule adds bean dip to the list of foods exempt from the total fat standard in the Smart Snacks regulations. This exemption applies to products marketed as hummus as well as bean dips made from any variety of beans, peas, or lentils. Bean dip will continue to be subject to the saturated fat standard for Smart Snacks, as well as all other Smart Snacks requirements. This change provides schools the option to sell bean dip, including hummus, as a Smart Snack.”⁵
- **Hummus and bean dip recipes:**
 - [Best Beet Hummus](#)
 - [Chocolate Chip Cookie Dough Hummus](#)
 - [Hummus](#)
 - [Refried Bean Dip](#)
 - [Sweet Potato Hummus](#)
 - [Sunshine Hummus](#)



Hummus, Credit: The Lunchbox

Opportunity #3: Allows nuts and seeds to credit for the full meats/meat alternates meal component.

- **Our summary:** The final rule allows nuts and seeds to credit for 100% [previously 50%] of the meats/meat alternates component with an implementation date of July 1, 2024. In other words, under the previous rules, if an operator offered a 1-oz package of sunflower seeds, they would only credit toward half of a 2-oz M/MA requirement and another 1-oz M/MA equivalent, such as a 1-oz string cheese, would have been required. Under the new rules, a 2-oz package of sunflower seeds is sufficient to fulfill the full 2-oz M/MA requirement.
- **The fine print from USDA:** “This final rule allows nuts and seeds to credit for the full meats/meat alternates component in all meals (breakfast, lunch, and supper) offered through the CNP. Also, nuts and seeds can continue to meet the entire meats/meat alternates requirement at snack. Serving nuts and seeds is an option, not a requirement; Program operators are not required to make any changes to their menus to comply with this provision. When offering nuts and seeds, operators may choose to offer them to meet the full component or a portion of it, alongside other meats/meat alternates.”⁶
- **Recipes featuring nuts and seeds:²**
 - [Breakfast Granola](#)
 - [Chewy Granola Bars](#)

Opportunity #4: Clarifies when and how schools can provide non-dairy milk as a fluid milk substitution.

- **Our summary:** While USDA did not make significant changes to the rules around offering non-dairy milk options, USDA did offer new guidance clarifying when and how schools can provide non-dairy milk as a fluid milk substitution:⁷
 - For students without a disability, schools *are encouraged* to offer fortified soy milk for students with a note from a medical authority OR a parent/guardian.
 - For students with a disability that is documented by a written medical statement, schools *must* offer a fluid milk substitute. USDA considers lactose intolerance a disability for these purposes.⁸
- **The fine print from USDA:** Substitutions for non-disability reasons: The 2024 final rule did not change the requirements related to non-dairy fluid milk substitutes. The process for providing a fluid milk substitute for *non-disability* reasons is required by the National School Lunch Act ([42 USC 1758\(a\)\(2\)\(B\)](#)). To provide a non-dairy fluid milk substitute for a non-disability reason, the statute and supporting regulations require: that the substitutions may be made if the school notifies the state agency that the school is implementing a variation allowed under this subparagraph ([42 USC 1758\(a\)](#)

2 Note that these recipes contain honey, making them not fully plant-based/vegan. Maple syrup or agave can be substituted for honey to make these recipes vegan.

(2)(B)(ii)); that the substitution is requested in writing by a medical authority or a child's parent or legal guardian ([42 USC.1758\(a\)\(2\)\(B\)\(ii\)](#)); that fluid milk substitutions must be nutritionally equivalent to fluid milk and must meet the nutrition standards established by the Secretary ([42 USC 1758\(a\)\(2\)\(B\)\(i\)](#)); and that the school cover any expenses related to providing fluid milk substitutes in excess of program reimbursements ([42 USC 1758\(a\)\(2\)\(B\)\(iii\)](#)). As supported by the governing statute, USDA regulations found at [7 CFR 210.10\(d\)\(2\)\(i\)](#) and [7 CFR 210.10\(d\)\(2\)\(ii\)](#) further describe who may write the requests for a fluid milk substitution for non-disability reasons and outline the nutrition requirements for non-dairy milk substitutes. While schools are not required to provide fluid milk substitutes for *non-disability* reasons, USDA encourages schools to do so.

- Substitutions for students with a disability: As a reminder, meal modifications must be provided for students with a disability that restricts their diet ([7 CFR 210.10\(m\)](#)). For example, if a student cannot consume cow's milk due to a disability, and a written medical statement as documentation of the student's disability is obtained by the school food authority, the school is required to provide a substitution for cow's milk. When providing a meal modification for a participant's disability, the substitution for cow's milk does not need to meet the *non-disability* fluid milk substitute requirements. The nutrition requirements for *non-disability* fluid milk substitutes apply only in *non-disability* situations.

Opportunity #5: Makes it easier to feature plant-based proteins at breakfast.

- **Our summary:** The final rule provides more flexibility at breakfast by allowing schools to offer meats and meat alternates (including plant-based options like soy yogurt; beans, peas, and lentils; and tofu) alongside or instead of grains.⁹
- **The fine print from USDA:** "The final rule establishes a combined grains and meats/meat alternates meal component in the [School Breakfast Program] and removes the requirement for schools to offer [1.0 ounce](#) equivalent of grains each day at

breakfast. Schools may offer grains, meats/meat alternates, or a combination of both to meet the minimum ounce equivalent in this combined meal component requirement."¹⁰

- **Breakfast recipes and products featuring plant-based proteins:**

- [Baja Breakfast Bowl](#)
- [Breakfast Sushi](#)
- **Meatless Sausage Crumble Products:** [Adda Veggie](#), [Ground Pro Crumbles](#), [Hungry Planet](#), [Rebelloys](#), [Planetarians](#)
- **Plant-Based Egg Products:** [Vegg](#), [Zero Egg](#)

Opportunity #6: Allows tofu to be served as part of the Summer Food Service Program, as well as to infants 6-11 months participating in CACFP and NSLP preschools; and clarifies creative ways to serve tofu across all child nutrition programs.

- **Our summary:** In November 2023, USDA issued updated guidance that allows tofu to be served as part of the Summer Food Service Program, as well as to infants 6-11 months participating in CACFP and NSLP preschools.¹¹ Previously tofu was only creditable for students 1 year and older in NSLP, SBP, and CACFP. The guidance also provides examples of creative and acceptable ways to serve tofu, including in stir-fries, omelets, miso soup, and minced in lasagna as a ricotta cheese replacement.
- **The fine print from USDA:** Schools participating in the National School Lunch Program (NSLP) and School Breakfast Program (SBP) (School Meal Programs) were provided the option to offer commercially prepared tofu as a meat alternate on July 1, 2012. This option was extended to centers and day care homes participating in the Child and Adult Care Food Program (CACFP) on October 1, 2017, for children ages 1 and older and adult participants. This memorandum clarifies that the same option also extends to the Summer Food Service Program (SFSP), as well as to infants 6-11 months participating in CACFP and NSLP preschools. The ability to offer tofu as a meat alternate allows meal providers in the School Meal Programs, CACFP, and SFSP to further diversify their menus and better meet the dietary needs of vegetarians and culturally diverse groups.

- Tofu is widely recognized as a meat substitute, comes in a variety of textures (such as silken, soft, firm, and extra firm), and may be served many ways, including in culturally appropriate and traditional dishes. Firm or extra firm tofu, in stir-fries, omelets, miso soup and minced in lasagna as a ricotta cheese replacement, for example, may credit toward the meats/meat alternates component. Meat substitute products such as links and sausages made from tofu are also easily recognizable as meat substitutes and can be included as creditable items in a meal or snack if minimum protein requirements for the tofu ingredient are met. However, tofu that is incorporated into items to add texture or improve nutrition, but is not easily recognizable as a meat substitute, such as in smoothies, sauces, and baked desserts, does not credit toward the meats/meat alternates component.

- **Recipes featuring tofu:**

- [Amazing Tofu LoMein](#)
- [Grilled Tofu Gyros](#)
- [Outrageous Orange Tofu Wrap](#)
- [Pineapple Tofu Fried Rice](#)
- [Teriyaki Tofu Bowl](#)
- [Tofu Sofritas Burrito Bowl](#)

Marketing Your Menu

Once you make the effort to adapt menus, how will students know? There are many [Climate-Friendly School Food Marketing and Promotional Materials](#) available for your use, including:

- [Plant-based protein food fact](#) posters (for specific beans, peas, and lentils)
- [“I tried it”](#) stickers
- [“What is climate-friendly school food?”](#) posters
- [The Benefits of Beans, Peas, and Lentils](#) graphics, fact sheets, posters, and more

Additional Resources for Schools to Expand Plant-Based Options

- [Balanced](#)
- [Coalition for Healthy School Food](#)
- [Forward Food](#)
- [Friends of the Earth](#)
- [Meatless Monday](#)
- [Physicians Committee for Responsible Medicine](#)

Have questions or need additional support?
Email climatefriendlyfood@foe.org.

Endnotes

- 1 *Final Rule - Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 DGAs | Food and Nutrition Service.* (n.d.). www.fns.usda.gov. <https://www.fns.usda.gov/cn/fr-042524>
- 2 *Summary of Provisions in the Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans Final Rule.* (n.d.). <https://fns-prod.azureedge.us/sites/default/files/resource-files/DGARuleFinalSummary5.2.24.pdf>
- 3 *Final Rule - Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 DGAs | Food and Nutrition Service.* (n.d.). www.fns.usda.gov. <https://www.fns.usda.gov/cn/fr-042524>
- 4 *Summary of Provisions in the Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans Final Rule.* (n.d.). <https://fns-prod.azureedge.us/sites/default/files/resource-files/DGARuleFinalSummary5.2.24.pdf>
- 5 *Summary of Provisions in the Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans Final Rule.* (n.d.). <https://fns-prod.azureedge.us/sites/default/files/resource-files/DGARuleFinalSummary5.2.24.pdf>
- 6 *Summary of Provisions in the Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans Final Rule.* (n.d.). <https://fns-prod.azureedge.us/sites/default/files/resource-files/DGARuleFinalSummary5.2.24.pdf>
- 7 <https://www.fns.usda.gov/cn/fluid-milk-requirements-schools>
- 8 *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans.* (2024, April 25). *Federal Register.* <https://www.federalregister.gov/documents/2024/04/25/2024-08098/child-nutrition-programs-meal-patterns-consistent-with-the-2020-2025-dietary-guidelines-for>
- 9 *Updates to the School Nutrition Standards | Food and Nutrition Service.* (n.d.). www.fns.usda.gov. <https://www.fns.usda.gov/cn/school-nutrition-standards-updates>
- 10 *Summary of Provisions in the Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans Final Rule.* (n.d.). <https://fns-prod.azureedge.us/sites/default/files/resource-files/DGARuleFinalSummary5.2.24.pdf>
- 11 https://drive.google.com/file/d/1_wt8NA4lJoby9R6f5a8MOwCcYqdUO8c1/view