

NAVIGATING WHAT'S NEXT:

USDA Priorities and Dietary Guidelines for Americans



**School Nutrition Programs
Area Meetings
Spring, 2026**

Current Priorities At USDA



Current USDA Priorities

Current Key Themes with USDA:

- **Emphasis on “real food”**

Programs are encouraged to prioritize whole, nutrient-dense foods and gradually reduce reliance on highly processed items, particularly those high in added sugars, sodium, and refined grains.

- **Preparation for future meal pattern updates**

While there are not immediate changes to meal pattern requirements USDA is laying the groundwork for future rulemaking to better align school meals with the updated DGAs.



Current USDA Priorities

Legislative Update: USDA FNS Final Rule on Whole Milk at Breakfast

The U.S. Department of Agriculture's Food and Nutrition Service (FNS) has issued a final rule under the Whole Milk for Healthy Kids Act of 2025, restoring the option for schools and child nutrition providers to serve whole and reduced-fat (2%) milk in federally funded programs, **including the School Breakfast and Afterschool Snack Programs.**

Effective date: June 8, 2026

Milk options: Whole, 2%, 1%, fat-free, and flavored milks are now permitted alongside existing choices. SFAs participating in the NSLP and SBP may exclude the saturated fat from fluid milk when calculating the weekly average saturated fat requirement at lunch and breakfast.



Current USDA Priorities

- **Focus on food quality within existing rules**

Schools are encouraged to work within current regulations to improve menu quality, ingredient choices, and overall nutritional value.

- **Support for American agriculture and local procurement**

SFAs are encouraged to look for opportunities to strengthen connections with domestic producers, including locally sourced foods where feasible.

- **Continued commitment to program integrity and access**

Ensuring meals remain accessible, compliant, and fiscally responsible remains a central priority alongside nutrition improvements.



Current USDA Priorities

Further Guidance Provided on Program Integrity:

USDA reaffirmed that program operators are expected to maintain strong internal controls to ensure meals claimed are allowable, properly documented, and actually served to eligible participants. This guidance does not introduce new rules, but it clearly signals heightened attention to:

- Accuracy
- Oversight
- Documentation
- Accountability

Programs that are organized, proactive, and responsive to issues are best positioned to avoid findings and ensure continued success.



Current USDA Priorities

Operational Check Points for Programs:

- **Know Your Risks**
 - Highlight common risk areas, including meal pattern requirements, meal counting, lack of oversight, and ineffective corrective actions.
- **Prioritize Accurate Documentation**
 - Operators are reminded to maintain clear, complete, and timely records
 - Documentation is positioned as the primary safeguard against findings.
- **Strengthening Oversight and Monitoring**
 - Regular and meaningful site monitoring
 - Timely follow-up on findings
 - Documented corrective action and technical assistance
 - Monitoring is framed as a **preventive tool**, not just a compliance exercise.



Current USDA Priorities

Operational Check Points for Programs:

- **Require Timely Corrective Action**
 - Corrective actions must be prompt, specific, and documented
 - Repeated findings signal systemic issues and may escalate enforcement
 - Training alone may not be sufficient without procedural changes
- **Create an Environment of Shared Responsibility**
 - Program integrity is a shared responsibility among state agencies, sponsoring organizations, and sites.
 - Open communication and proactive problem-solving allow help prevent issues from becoming serious compliance concerns.



Current USDA Priorities



UNITED STATES DEPARTMENT OF AGRICULTURE

HOTLINE





Report violations of laws and regulations relating to USDA programs. Including:

- Threats to Public Health within the Food Supply Chain
- Animal Care and Welfare
- USDA Senior Management Misconduct
- Mismanagement and Fraud related to:
 - USDA Grants and Contracts
 - Farm Programs
 - Nutrition Programs (SNAP, WIC, Child and Adult Care, School Lunch, etc.)

The identity of complainants is protected under the provisions of the Whistleblower Protection Act of 1989.

USDA is an equal opportunity provider, employer, and lender.

HOW TO REPORT

Scan code above or visit
<https://usdaoig.oversight.gov/resources/hotline-information>



REPORT FRAUD, WASTE, AND ABUSE

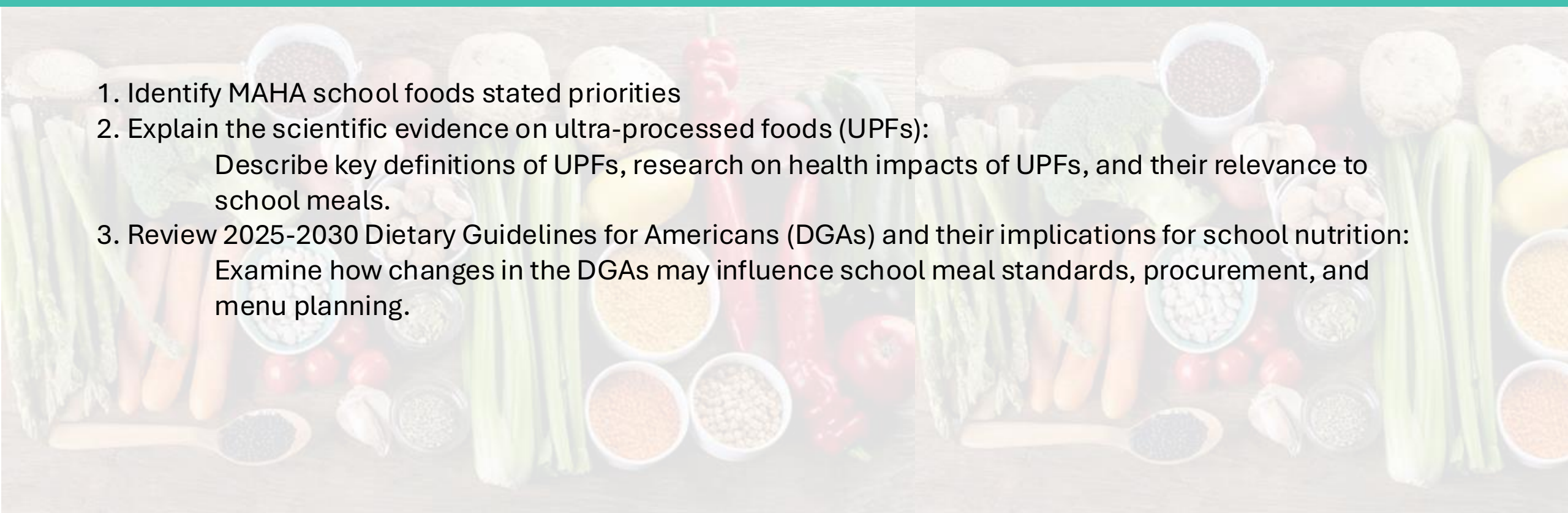


Dietary Guidelines for Americans 2026

USDA



Learning Objectives

- 
1. Identify MAHA school foods stated priorities
 2. Explain the scientific evidence on ultra-processed foods (UPFs):
Describe key definitions of UPFs, research on health impacts of UPFs, and their relevance to school meals.
 3. Review 2025-2030 Dietary Guidelines for Americans (DGAs) and their implications for school nutrition:
Examine how changes in the DGAs may influence school meal standards, procurement, and menu planning.

Speaker



Rachel Fowler, MS, RD, SNS
Education Specialist, ALSDE x 1 year!
CNP Director x 14 years

Background: Clinical Nutrition in Healthcare
settings, Restaurant and culinary training

Mom of 2 beautiful girls and a German Shepherd

Based in Birmingham

The MAHA Report

- Poor diet and ultra-processed foods identified as a one of four potential drivers behind increasing childhood chronic disease
- Noted that school meal patterns “do not set limits on UPF consumption, leading to excessive intake of sugar, processed carbohydrates, processed fats, and sodium among children
- Critique reformulation and “minor ingredient adjustments” to meet Smart Snacks
- Highlight other countries’ approaches, including France, Japan, Sweden, and Finland



[The MAHA Report - The White House](#)

Strategy Report

- Limit or prohibit the use of petroleum-based food dyes; USDA will apply the framework to food served through the school lunch program.
- Continue efforts to develop a definition for “Ultraprocessed Food”
- Remove restrictions on whole milk sales in schools
- Eliminate mandatory reduced-fat requirements in federal nutrition programs



[The-MAHA-Strategy-WH.pdf](#)

Ultra-processed Foods



- NOVA Classification System
- Criteria: **extent** and **purpose** of processing
- Developed by Dr. Carlos Monteiro in 2010 in response to increasing rates of obesity and chronic disease and displacement of traditional diets in Brazil
- Goal: Describe the foods interfering with and transforming traditional Brazilian diets to the detriment of public health

NOVA Classification

Group	Extent of processing	Purpose of processing	Examples
Nova 1: Unprocessed and minimally processed foods	Edible parts of plants or animals that remain whole or undergo minimal alterations like cutting, drying, freezing, or pasteurization. No other food substances added to the original food.	To extend food life, enable longer storage, make preparation easier.	Milled grains, raw meat, fresh fruits and vegetables, milk, eggs, nuts 

NOVA Classification

Group	Extent of processing	Purpose of processing	Examples
Nova 2: Processed culinary ingredients	Substances extracted from Nova 1 foods through pressing, refining, or grinding.	For use in the preparation, seasoning, and cooking of Nova 1 foods. <i>May contain preservatives</i>	Oil, butter, sugar, salt 

NOVA Classification

Group	Extent of processing	Purpose of processing	Examples
Nova 3: Processed foods	Nova 1 foods with added Nova 2 ingredients, using preservation methods such as canning, pickling, curing, smoking, or fermentation.	To increase the durability of Nova 1 foods and make them more enjoyable by modifying or enhancing their sensory qualities. <i>May contain preservatives</i>	Canned vegetables in brine; salted nuts; cured meats, fruits in syrup, freshly made unpackaged breads and cheeses. 

NOVA Classification

Group	Extent of processing	Purpose of processing	Examples
Nova 4: Ultra-processed foods	Industrial formulations using extracted substances, chemically modified ingredients, and cosmetic additives (flavors, colors, emulsifiers). Multiple processing steps.	To create highly profitable products (low-cost ingredients, long shelf-life, branding + marketing) that are convenient (ready-to-consume) and hyper-palatable. Liable to displace all other Nova food groups, especially Nova 1 foods.	Soda, packaged bread, breakfast cereal, frozen pizza, hot dogs, ice cream 

NOVA Classification

- Nova Category 4 are industrial formulations designed for the purpose of competing with the other three Nova groups and maximizing industry profits
- Manufacturers do not disclose purpose of processing/formulation, so Nova uses additives as markers for manufacturer intent:
 - Food substances of no culinary use (e.g., high-fructose corn syrup, modified starches)
 - Cosmetic additives (e.g., flavors, colors)

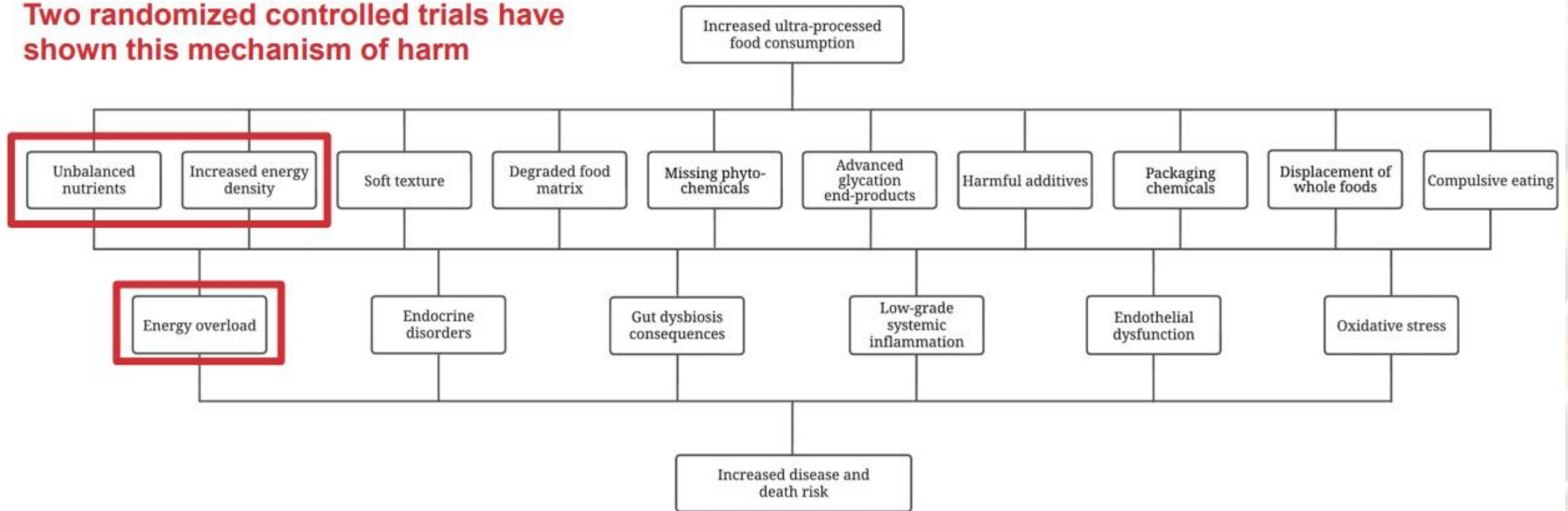
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UPFs

How do they hurt health?

20

Two randomized controlled trials have shown this mechanism of harm



Monteiro & Astrup, ASN Great Debates in Nutrition, 2022; TL Fazzino et al. *Nature Food* 4:144-147 (2023); TL Fazzino et al. *Obesity* 27:1761-1768 (2019); L Johnson et al. *Obes Rev* 10:681-692 (2009); Hall et al unpublished analysis (N=36): ClinicalTrials.gov NCT05290064

UPFs

How do they hurt health?

What the Food Matrix Is

The food matrix is the **physical structure** in which nutrients exist — including protein networks, fat globules, fiber, and water — that influences how nutrients are released, absorbed, and interact with the body.

The food matrix “Governs the metabolic fate of nutrients”

It affects:

Oral processing (chewing, texture)

Nutrient bioavailability

Satiety signals

Gut microbiota interactions

Metabolic hormone responses

UPFs

How do they hurt health?

Degradation happens when:

Processing (e.g., extrusion, high-heat cooking, chemical additives) breaks down natural structures.

Fiber and water are removed or altered, changing texture and nutrient release.

Protein and fat networks are disrupted, affecting satiety and hormone signaling

For example, turning whole corn into chips reduces fiber and alters the rate of nutrient release, affecting glycemic response and satiety. AGEs are the end result.

UPFs

How do they hurt health?

Health Implications...A degraded matrix can:

Speed up eating by softening texture, reducing chewing, and weakening early satiety signals

Increase nutrient absorption rate, suppressing distal gut hormones like GLP-1 and PYY, which regulate appetite

Promote insulin resistance and **hepatic fat production** due to rapid nutrient flux

Disrupt gut microbiota and weaken the intestinal barrier, leading to low-grade inflammation

Be linked to higher disease risk: obesity, type 2 diabetes, cardiovascular disease

UPFs

How do they hurt health?

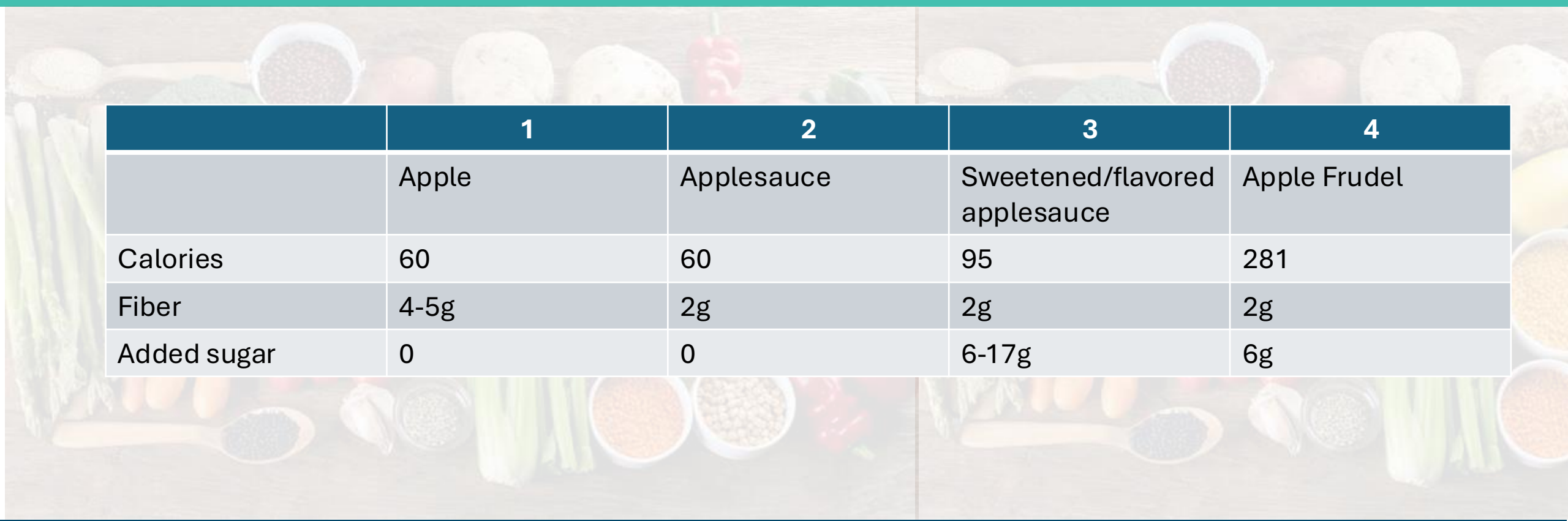
Why It Matters

Nutrition science is shifting from focusing solely on **nutrient composition** to also evaluating **matrix integrity**. The “**3V index**” (Real, Vegetal, Varied) prioritizes the preservation of the original food matrix as the most important factor for health

A 2017 Study of 9,317 people showed UPFs provided significantly less protein, fiber, Vitamins A,C,D,E, zinc, potassium, phosphorus, magnesium and calcium and MORE sugar and saturated fat relative to the calories they provide compared to the processed/minimally processed. Unbalanced nutrients = Calorie QUALITY matters!

UPFs

NOVA 1 2 3 4



	1	2	3	4
	Apple	Applesauce	Sweetened/flavored applesauce	Apple Frudel
Calories	60	60	95	281
Fiber	4-5g	2g	2g	2g
Added sugar	0	0	6-17g	6g

How does your school measure up?

Figure 1. Spectrum of processing of school foods based on the NOVA classification*

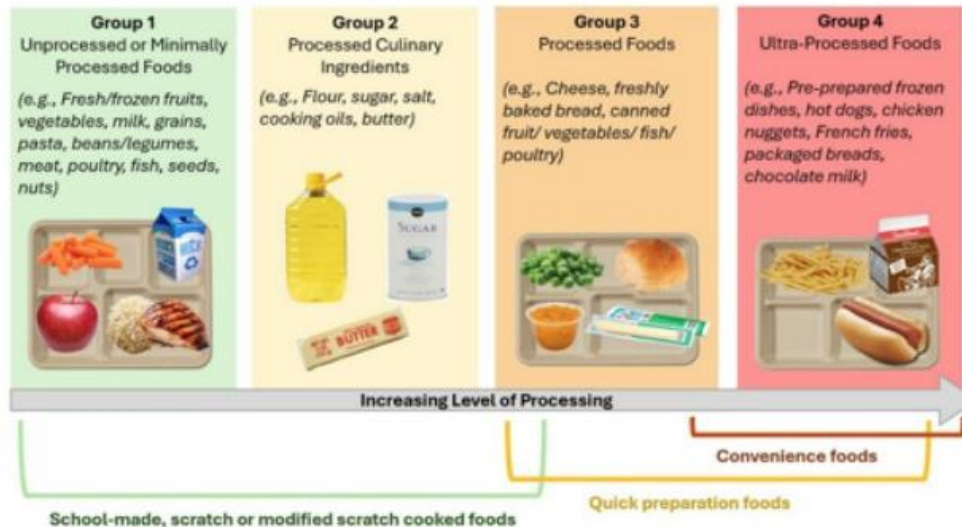


Image adapted from [Crimarco et al.](#) Definitions adapted from [Monteiro et al.](#)
Source: [Cohen et al., 2025](#)

In a 2025 survey of 1,226 school food authorities across 8 states:

- 25% offered convenience foods daily
- 52% offered convenience foods at least 3x/week
- 30% offered quick preparation foods daily
- 54% offered quick prep foods at least 3x/week
- 17% offered scratch/modified scratch cooked foods daily
- 44% offered scratch/modified scratch cooked foods at least 3x/week
- 3% offered scratch/modified scratch cooked foods exclusively

Source: [Cohen et al., 2025](#)

Dietary Guidelines



The U.S. Departments of Agriculture (USDA) and Health and Human Services (HHS) released the new guidelines on January 7, 2026, marking what they call a “historic reset” in federal nutrition policy, shifting focus back to “real food” and nutrient-dense choices.

The guidelines introduce a new inverted food pyramid, prioritizing high-quality protein (animal and plant), full-fat dairy, vegetables, fruits, healthy fats, and whole grains, while calling for dramatic reduction in highly processed foods.



Dietary Guidelines- What does that mean for schools?

Update to DGA

Added Sugars: no added sugars recommended for children through age 10; age 11+: no more than 10 grams of added sugars per meal.

- Snack foods should follow FDA "Healthy" claim limits for added sugars
- Dairy should have no added sugars

Protein: increase in recommended intake from 0.8 g/kg/day to 1.2 - 1.6 g/kg/day

Potential CNP Change

- No added sugars for programs serving children through age 10 (i.e., no flavored milk, yogurt, sweetened items, etc.)
- Per meal limits rather than weekly or product limits for ages 11+
- Updates to Smart Snacks (school competitive foods)
- Application of FDA "Healthy" definition to some foods

- Reclassification of how protein is "counted" in meal patterns

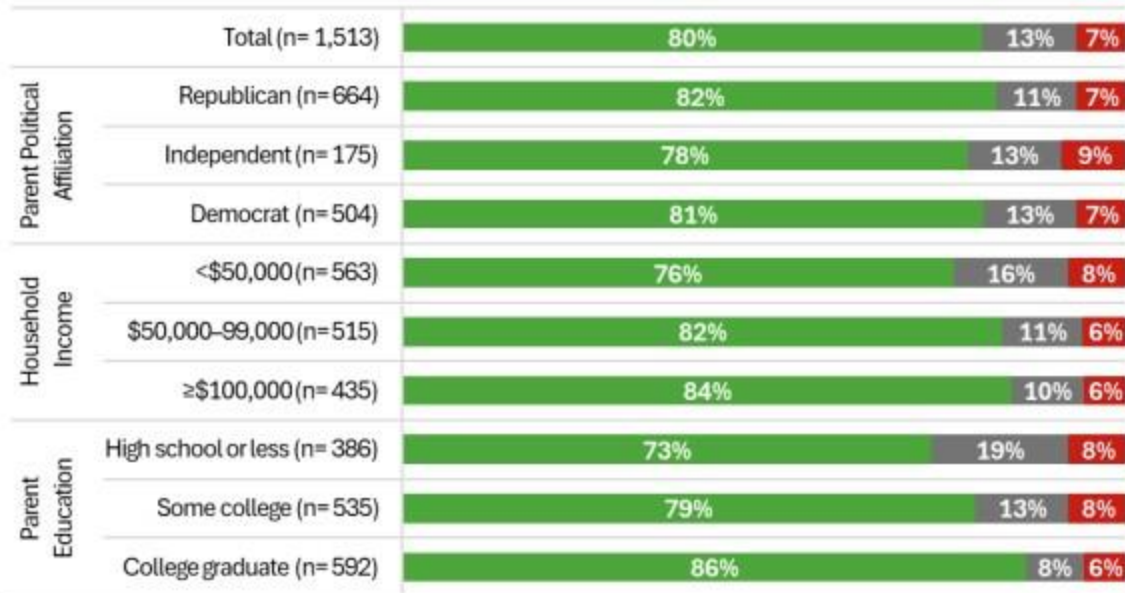
Dietary Guidelines- What does that mean for schools?

Update to DGA	Potential CNP Change
Saturated Fat & Dairy: emphasis on full-fat dairy, animal proteins with saturated fat; maintained 10% limit on kcal from saturated fat	• Allowance of full-fat dairy in all programs • Removal of weekly saturated fat limit or specific product exemptions for whole milk, whole-milk yogurt
Highly Processed Foods: avoid highly processed packaged and prepared foods that are salty or sweet. Limit artificial flavors, petroleum-based dyes, artificial preservatives, low-calories non-nutritive sweeteners.	• New processing criteria/limits • Bans on products with dyes, artificial preservatives, non-nutritive sweeteners
Vegetables: no inclusion of specific subgroup recommendations, such as dark green, red/orange, beans/peas/lentils	• Removal of 5 vegetable subgroups for school meals • Reduced variety of vegetables required

Community Support

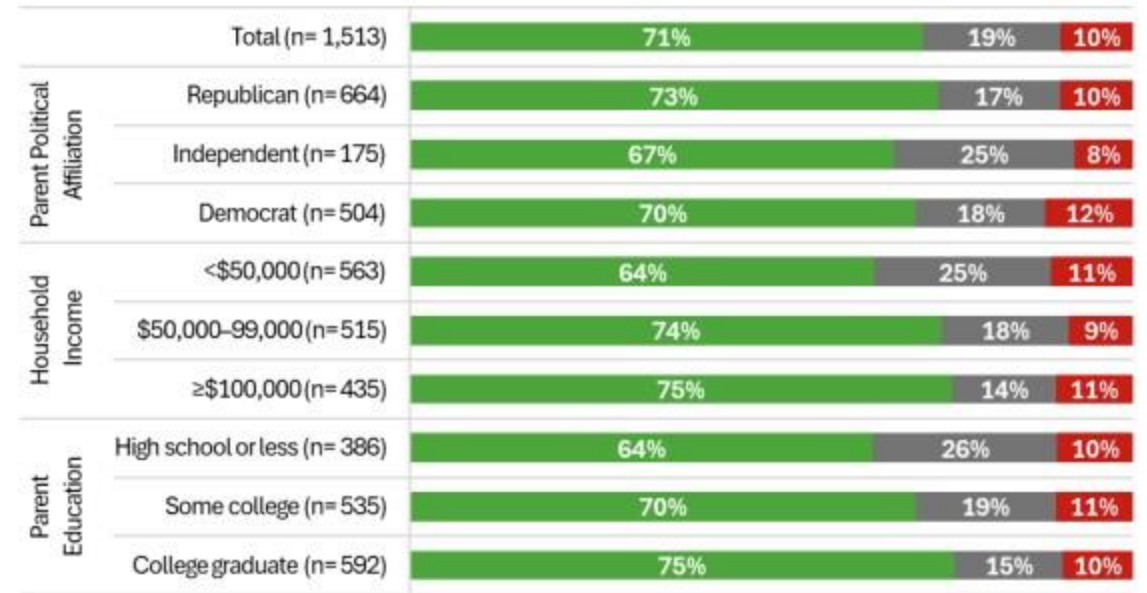
All foods with potentially harmful additives should be banned in the National School Lunch Program and School Breakfast Program

■ Agree (strongly and somewhat) ■ Neither agree nor disagree ■ Disagree (strongly and somewhat)



All ultra-processed foods should be banned in the National School Lunch Program and School Breakfast Program

■ Agree (strongly and somewhat) ■ Neither agree nor disagree ■ Disagree (strongly and somewhat)



Planning for the future

NOVA:

Ultra-processed foods are industrially manufactured “formulations made mostly or entirely from substances derived from foods and additives”. These include common ingredients like sugars, oils, and salt, but also highly processed substances not found in home cooking. UPFs also contain additives, some shared with processed foods (e.g. preservatives and stabilizers), but also dyes, artificial flavors, non-nutritive sweeteners, and processing aids like emulsifiers, anti-caking agents, and glazing agents.

Source: Monteiro et al., 2017



Planning for the future

The best preparation right now is intentional progress, not perfection. Programs that focus on menu quality, staff training, and operational readiness will be in a strong position when USDA releases the next round of meal pattern updates.

1. Strengthen menu foundations
2. Get ahead on product review
3. Build staff knowledge & skills
4. Assess equipment and infrastructure
5. Communicate early with administration
6. Stay informed without becoming overwhelmed



Questions?

Ask US

