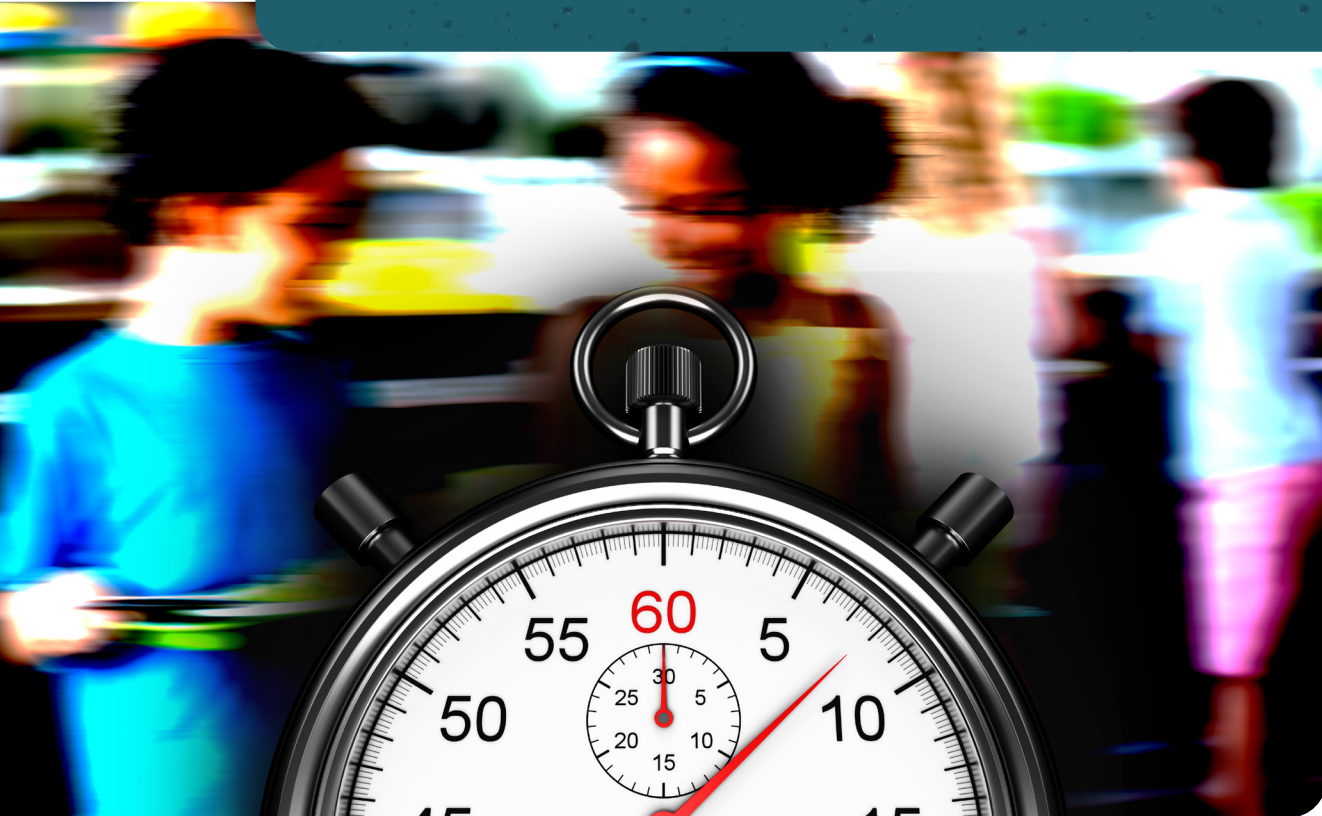




CENTER FOR
Science IN THE
Public Interest
Your Food and Health Watchdog

Making time to eat

A REVIEW OF STATE POLICIES AND GUIDANCE
ON SCHOOL MEALTIME DURATION



Photos: stock.adobe.com - Wavebreakmedia/Micro (children), vectorfusionart (stopwatch).

AUTHORS:

Catherine Cochran
Emily Friedman
Alla Hill
Antonia Scherlen
Erin Ogden
Meghan Maroney

Center for Science in the Public Interest
www.cspi.org

Center for Science in the Public Interest

The Center for Science in the Public Interest (CSPI) is your food and health watchdog. We are a rigorous driver of food system change to support healthy eating, safe food, and the public's health. We transform the food environment through leading-edge policy innovations grounded in meticulous research and powerful advocacy at the national, state, and local level. We galvanize allies to drive system-wide changes and healthier norms, leveraging the greatest benefits for people facing the greatest risk. CSPI is fiercely independent; we accept no funding from industry. Our work is supported by the hundreds of thousands of subscribers to our award-winning Nutrition Action and from foundations and individual donors.

For more information, contact:

Center for Science in the Public Interest (CSPI)
Email: policy@cspi.org

Acknowledgements

We would like to thank all the CSPI staff who contributed to this report (listed in alphabetical order): Jorge Bach, Rhea Jayaswal, Joelle Johnson, Anupama Joshi, Peter Lurie, and Sara Ribakove.

This report is supported by the From Now On Fund.

| Executive Summary

Advocates across the U.S. are working to ensure that all children have access to no-cost, nutritious meals at school. Nine states have implemented healthy school meals for all policies, and in 2024, the U.S. Department of Agriculture (USDA) issued updated school nutrition standards that make school meals healthier than ever before. However, it does not matter how accessible or nutritious school meals are if students do not have time to eat them. Short lunch periods are linked to significantly lower consumption of school meals and increased plate waste. To promote nutrition and reduce food waste, experts, including the Centers for Disease Control and Prevention (CDC), recommend students receive, at minimum, 20 minutes of seated time at lunch or a 30-minute lunch period total, and 10 minutes of seated time at breakfast, known as sufficient time to eat (TTE). Currently, no federal policies requiring minimum meal-period durations for schools exist, but minimum mealtimes are sometimes mandated at the state or district level.

The Center for Science in the Public Interest (CSPI) conducted a scan to establish the prevalence of state-level policies and guidance on sufficient TTE in schools in all 50 states and the District of Columbia (D.C.). Data was collected via a three-step process: a state agency website and Google search, email outreach to state agencies, and a LexisNexis search. The content of the policies and guidelines obtained in this search were further analyzed to determine alignment with CDC's recommendations for TTE.

Overall, 12 jurisdictions (24%) had either a policy or guidance that aligned with CDC TTE recommendations for at least one meal. Twenty-nine percent (15/51) of jurisdictions have an existing TTE policy and 13 of those also have accompanying agency-issued guidance. Thirty-one percent (16/51) of jurisdictions lack a policy but have issued guidance about TTE.

Of the 15 jurisdictions with a TTE policy, four (D.C., South Carolina, Washington, and West Virginia) have language that aligns with the CDC's quantitative recommendations for ensuring that students have enough TTE at lunch. Three state TTE policies (Florida, Virginia, and West Virginia) include language that aligns with CDC's recommendations for TTE at breakfast.

Of the 29 jurisdictions with guidance, 10 have language that aligns with the CDC's quantitative recommendations for ensuring that students have enough TTE at lunch (D.C., Michigan, Nevada, New Mexico, North Carolina, South Carolina, Utah, Virginia, Washington and West Virginia). Eight states' (Michigan, Nevada, North Carolina, South Carolina, Utah, Virginia, Washington and West Virginia) guidance documents align with CDC's recommendations for TTE at breakfast, and two states (Alabama and Florida) included quantitative recommendations for unspecified "meal(s)".

We urge USDA, state legislatures, state education departments, local education agencies, and school districts to consider TTE policies to ensure that the maximum benefits of school meal programs to students can be realized.

| Background

NUTRITIONAL BENEFITS OF SCHOOL MEALS

Approximately 30 million children across the country participate in the National School Lunch Program (NSLP) every day, and about 16 million participate in the School Breakfast Program (SBP).^{1,2} The NSLP and SBP are administered federally by the U.S. Department of Agriculture's (USDA) Food and Nutrition Services (FNS), at the state level by state agencies (typically departments of education or agriculture), and locally through school food authorities (SFAs).^{3,4} For example, USDA regulates nutrition standards for meals served by schools participating in the programs, and SFAs are responsible for administering the school meal programs at the local and district level. School meals are one of the healthiest sources of food for kids in the United States and consuming them is

associated with higher diet quality.^{5,6} This is because school meals include a wide range of fruits and vegetables, whole grains, and must follow age-specific limits on calories, sodium, and—starting in 2027—added sugars. These requirements were established under the 2012 rule, *Nutrition Standards in the National School Lunch and School Breakfast Programs* and the 2024 rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020–2025 Dietary Guidelines for Americans*.^{7,8}

Notably, USDA regulates nutrition standards but not meal period duration. TTE refers to the amount of seated time students have to eat their food after they have received their meal. The Centers for Disease Control and Prevention (CDC) recommends that students be given at least 10 seated minutes for breakfast and 20 minutes for lunch once they have received their meal, and in total, a minimum 30-minute lunch break.^{9,10}

IMPORTANCE OF SUFFICIENT TIME TO EAT

While the evidence base is somewhat limited, research has demonstrated multiple benefits of sufficient TTE, including greater consumption of school meals and reduced food waste, which can mitigate the environmental impact of school meals. A 2021 systematic review of the research on interventions, policies, and initiatives to improve school meal consumption identified four research studies examining the relationship between school lunch duration and school meal consumption.¹¹ In three of these studies, greater lunch duration was positively associated with various school meal consumption outcomes, including average total meal consumption and increased odds of consuming fruits and whole grains. The researchers concluded that enabling students to have sufficient TTE with longer (~30 minute) lunch periods is an evidence-based strategy to improve school meal consumption. Similarly, a 2026 study in elementary schools found that greater TTE was associated with reduced food waste, particularly for milk, fruits, and whole grain sides.¹²

The most recent national-level data on the sufficiency of students' TTE was published in 2019 and based on School Year 2014-2015.¹³ USDA's School Nutrition Meal Cost Study found that 79% of students reported that they had enough TTE after they got their lunch and were seated, 8% of students reported that they did not have enough TTE, and 13% said they sometimes did not have enough TTE.¹⁴ In a 2016 study, researchers observing students in Massachusetts found that among lunch periods reported by schools to be 20–30 minutes, actual seated time ranged from just 10 to 33 minutes (some students arrived early or late to lunch, extending the total time to greater than the lunch period).¹⁵ A 2026 study in Arizona, California, Connecticut, and Massachusetts found this to be relatively unchanged: among lunch periods reported by schools to be 20–30 minutes, actual seated time ranged from just 7 to 33 minutes.¹⁶

IMPACTS OF INSUFFICIENT TIME TO EAT

Insufficient TTE poses equity and food security concerns for students who rely on free school meals because their families cannot afford to send food from home, younger students who take longer to eat, and students with disabilities. Recent research found that schools in high-poverty areas providing free school meals to all students through the Community Eligibility Provision (CEP) were more likely to have shorter lunch periods than non-CEP participating schools.¹⁷ This concerning finding requires more examination, given that CEP seeks to reduce the social stigma of school meal participation, but could be resulting in decreased intake of school meals for students who rely on them. Further examination into why this trend does not persist at the state level is also needed.

FEDERAL GUIDANCE AND LIMITATIONS

Current federal regulations dictate timing of lunches (between 10 A.M. and 2 P.M.), but not the duration.¹⁸ USDA's FNS "encourages schools to provide sufficient lunch periods that are long enough to give all students adequate time to be served and to eat their lunches."¹⁹

The U.S. Department of Education does not provide guidance or requirements on meal duration, but the CDC states:²⁰

- “Schools can schedule lunch periods that are longer than 20 minutes”
- “Some studies suggest that a 30-minute lunch period allows students to have the recommended 20 minutes of seat time”
- “States can consider policies that address sufficient seat time, which is associated with schools providing at least 30 minutes for lunch”

STATE LAWS

State authority over school schedules, including how time is allocated to instruction, meals, and other parts of the school day, plays a central role in whether students have sufficient TTE. States set minimum, and sometimes maximum, time allotted as “instructional time,” which varies by state but can roughly be defined as the total time students are in school.²¹ The Covid-19 pandemic led to widespread declines in academic achievement, making instructional time more valuable as schools work to address learning loss. Because lunch periods can expressly fall outside of instructional time, decisions about meal duration are often shaped by how states and districts balance instructional time mandates with other parts of the school day.²²

In the absence of a federal requirement setting a minimum school meal duration, states (or school districts in “local control” states) can mandate or recommend meal durations. Local control states grant local governing bodies such as school boards autonomy to make most decisions about public education.²³ A 2018 analysis found that only 16 states and the District of Columbia (D.C.) had laws requiring a minimum lunch duration. Schools in these states were more likely to provide students with at least 30 minutes to eat lunch after being seated as compared to states without laws that mandate a minimum amount of time for lunch (43% vs 27%, $P=0.042$).²⁴

Nine states have also implemented permanent statewide healthy school meals for all (HSMFA), which, like CEP, allow all students to receive free meals.²⁵ However, while recent research found that students in CEP schools had less time to eat, and seated time was inversely associated with school poverty levels, state-level free school meals (HSMFA) policies were not adversely associated with seated time or consumption.²⁶

SCHOOL DISTRICT POLICIES

The CDC’s nationally representative 2016 study of health policies and practices in public schools found that 19% of districts required and 33% of districts recommended a minimum amount of TTE breakfast, and 36% required and 40% recommended a minimum amount of TTE lunch.²⁷ Among the districts with a policy or practice that either required or recommended a minimum amount of seat time, 88% required or recommended CDC’s recommended 10 minutes or more for breakfast, and 66% required or recommended CDC’s recommended 20 minutes or more for lunch. This means that of the districts with policies or practices on TTE, the majority at least recommend alignment with CDC’s recommendations. Yet 48% of districts did not have policies or practices regarding TTE breakfast and 24% do not have policies or practices on TTE lunch.

Existing data on TTE policies paint an incomplete picture. The most recent study reporting which states had time-to-eat policies was published in 2018. That research examined state laws related to promotional strategies and duration of lunch periods, but did not explore compliance mechanisms or state-level enforcement.²⁸ This CSPI report sheds light on progress since 2018 through a scan of TTE policies and guidance in all states nationwide and to our knowledge is the first to explore state-level compliance and enforcement.

I Methods

Data was collected for all 50 states and D.C. between July-December 2025 via a three-step process: a state agency (typically education or agriculture department) website and Google search, email outreach to state agencies (typically education or agriculture department), and a LexisNexis search. First, CSPI conducted an internet search on Google and state agency websites to locate publicly accessible materials related to TTE policies and guidance. Search terms included: “time to eat,” “mealtime duration,” “lunchtime duration,” “mealtime schedule,” and “lunchtime schedule.” If additional terms were used, the data collector noted those separately. Notably, district-level policies and guidance were excluded from this search and sample.

“Policies” were defined as active state-level statutes and regulations that specify the minimum time requirements for breakfast and/or lunch periods in K-12 public schools.

“Guidance” was defined as non-binding regulatory materials, such as agency guidance documents, memos, toolkits, and trainings that specify the minimum time recommendations for breakfast and/or lunch periods in K-12 public schools.

Second, CSPI conducted email outreach to senior school nutrition representatives at all state agencies administering USDA school meals programs (typically the state education or agriculture department). The purpose of this email outreach was to corroborate findings from the state TTE policy and guidance searches and gather information about enforcement and compliance practices. We contacted agency staff with titles ranging from Director, Chief, Program Manager, to Program Administrator related to school meals. Up to three people per jurisdiction were contacted, depending on available contact information and response rate. Questions were tailored based on results of the internet search findings. CSPI adjusted our initial determinations of whether states had policies or guidance based on agency responses.

If the policy and guidance search returned both a TTE policy and TTE guidance, CSPI asked the agency representative three questions:

- 1 Is this policy and guidance the most up to date time-to-eat policy for schools in your state?
- 2 Is the linked policy/guidance being enforced? If so, can you share details on how and by whom it is being enforced?
- 3 Do you have data on how many schools are compliant with this policy/ guidance?

If the policy and guidance search returned either a TTE policy or TTE guidance, but not both, CSPI asked the following:

- 1 Is there guidance for schools, provided from the Department of Education or another agency, about this policy? OR;
- 2 Is there a state statute or regulation that informs this guidance?

If the policy and guidance search returned neither a TTE policy nor TTE guidance, CSPI asked:

- 1 I was unable to find any information online about whether your state has an official policy or guidance for mealtime scheduling in schools. Does that information exist, and if so, could you share it with me?

If the email response indicated the state or territory provided no official TTE policy or guidance, CSPI followed with a second question:

- 2 Is there a reason why your agency does not provide guidance on time to eat?

Third, we conducted a LexisNexis search using the same search terms described for the Google search above to search the state code of each of the 50 states.

ANALYSIS

We analyzed the content of each policy and guidance document to determine its alignment with CDC recommendations for sufficient TTE and documented enforcement and compliance practices for the jurisdictions with policies. Individual policies and guidance were rated as “strong,” “moderate,” or “weak” according to the criteria listed in Figure 1. These ratings are based on the strength of the policy or guidance language, where the strongest policies used language for mandatory seated time at each meal period and aligned with CDC’s quantitative recommendations for sufficient TTE; relatively weaker policies used vague language related to seated time during meals or specified seated time at each meal that did not meet CDC’s quantitative recommendations. Policies and guidance that only restate federal requirements, which stipulate that schools must schedule lunch periods between 10 AM – 2 PM, were categorized as “weak.” We made this distinction not to shame states that are meeting federal requirements, but to celebrate states that are going above and beyond federal requirements, which we discuss further in the “Discussion” portion of the report.

Figure 1. TTE Policy and Guidance Ratings

TTE Policy and Guidance Rating

STRONG (aligned with CDC recommendations)

- **Required** seated time for breakfast, or TTE after receiving meal, of at least 10 minutes OR
- **Required** seated time for lunch, or TTE after receiving meal, of at least 20 minutes, or a 30-minute lunch period OR
- **Required** minimum time for lunch period of at least 30 minutes

MODERATE

- **Required** seated time for breakfast, or TTE after receiving meal, of nine minutes or less OR
- **Required** seated time for lunch, or TTE after receiving meal, of 19 minutes or less OR
- **Required** minimum time for lunch period of 29 minutes or less OR
- **Recommended or encouraged** seated time for breakfast, or TTE after receiving meal, of at least 10 minutes OR
- **Recommended or encouraged** seated time for lunch, or TTE after receiving meal, of at least 20 minutes OR
- **Recommended or encouraged** 30-minute lunch period

WEAK

- **Required, recommended, or encouraged** adequate or sufficient TTE.

Results

We found that 29% (15/51) of jurisdictions (California, Colorado, Connecticut, D.C., Florida, Kentucky, Massachusetts, Mississippi, New Hampshire, New Mexico, New York, South Carolina, Virginia, Washington, and West Virginia) have a TTE policy, of which 13 also have accompanying agency-issued guidance (Table 1). We found that 31% (16/51) of states have no statewide policy but do have agency-issued guidance about TTE. Finally, we identified that 39% (20/51) of states had neither policy nor guidance. Appendix A details all state TTE policies and guidance and their strength rating.

Table 1. Inventory of Time-to-Eat Policy and Guidance in U.S. States (2026)

Jurisdiction	State Policy	Guidance	Jurisdiction	State Policy	Guidance
Alabama		✓	Montana		
Alaska		✓	Nebraska		
Arizona*		✓	Nevada		✓
Arkansas			New Hampshire*	✓	✓
California	✓	✓	New Jersey*		
Colorado	✓	✓	New Mexico	✓	✓
Connecticut	✓	✓	New York	✓	✓
Delaware			North Carolina		✓
District of Columbia	✓	✓	North Dakota		
Florida*	✓	✓	Ohio		
Georgia			Oklahoma		
Hawaii*		✓	Oregon		✓
Idaho			Pennsylvania		
Illinois		✓	Rhode Island		
Indiana		✓	South Carolina*	✓	✓
Iowa		✓	South Dakota		
Kansas		✓	Tennessee		
Kentucky*	✓		Texas*		✓
Louisiana			Utah		✓
Maine			Vermont		✓
Maryland			Virginia	✓	✓
Massachusetts	✓	✓	Washington	✓	✓
Michigan		✓	West Virginia	✓	✓
Minnesota			Wisconsin		✓
Mississippi*	✓		Wyoming		
Missouri					

*Indicates that data was not verified by a state agency representative.

Six of the 15 policies analyzed had language that we rated as “strong,” three were rated as “moderate,” and six were rated as “weak.” Of the 15 jurisdictions with a TTE policy, four (D.C., South Carolina, Washington, and West Virginia) have language that aligns with the CDC’s quantitative recommendations for ensuring that students have enough TTE at lunch. Three state TTE policies

(Florida, Virginia, and West Virginia) include language that aligns with CDC's recommendations for TTE at breakfast. Seven policies address lunch and breakfast, seven address lunch only, and one state policy applies to breakfast only.

Twelve of the 29 guidance materials analyzed had language that we rated as "strong," 10 were rated as "moderate," and seven were rated as "weak." Of the twelve states with "strong" guidance, 10 have language that aligns with the CDC's quantitative recommendations for ensuring that students have enough TTE at lunch (D.C., Michigan, Nevada, New Mexico, North Carolina, South Carolina, Utah, Virginia, Washington and West Virginia), eight states' (Michigan, Nevada, North Carolina, South Carolina, Utah, Virginia, Washington and West Virginia) guidance documents align with CDC's recommendations for TTE at breakfast, and two states (Alabama and Florida) included quantitative recommendations for unspecified "meal(s)." Seventeen guidance materials address lunch and breakfast, seven address lunch only, and one policy applies to breakfast only. Additionally, four guidance materials did not specify which meal(s) they apply to.

Overall, 12 jurisdictions (24%) had either a policy or guidance that aligned with CDC TTE recommendations for at least one meal.

In total, school nutrition staff from 42 agencies responded to our email outreach (82%, 42/51 agencies). We attempted to collect information about enforcement and compliance practices from state agency staff for the 15 jurisdictions with TTE policies. Eight of the fifteen jurisdictions responded to CSPI's questions about enforcement and compliance. Two jurisdictions, D.C. and Virginia, reported that enforcement and compliance with their TTE policy is assessed as part of the Administrative Review process, which is a federally mandated process in which SFAs participating in the NSLP and SBP must complete on a five-year cycle to ensure compliance with federal requirements.²⁹ Massachusetts reported that the Massachusetts Department of Elementary and Secondary Education enforces its TTE guidance as part of the "school lunch review." Similarly, New York reported that TTE is assessed during "on-site monitoring reviews of school meal services," and West Virginia reported that mealtimes are required when districts complete their annual application to the state agency to receive federal reimbursement. One state, New Mexico, reported not enforcing its TTE policy due to it being a "local decision." Connecticut reported the most robust enforcement plan, which includes an annual approval of school meal schedules by the state department of education.

Discussion

Overall, our findings highlight three interrelated themes shaping the landscape of TTE policies: variability in policy design and authority, challenges related to implementation and compliance, and emerging—but still limited—evidence on policy efficacy. Less than a third of all U.S. states have a mandatory, statewide policy covering adequate seated time for school breakfast or lunch meals. To our knowledge, the most recent assessment of statewide TTE policies conducted in 2018 reported state laws addressing adequate TTE in school lunch were available in 17 jurisdictions.³⁰ In at least one case, a state regulation on adequate TTE in Delaware was repealed in 2016,³¹ and the state has not adopted a mandatory TTE policy since then. However, the differences in the prevalence of statewide TTE policies in our two studies may be due to differences in policy search methods, such as search terms, or differences in classification of "state laws" which included "any state health or nutrition education standards incorporated by reference into the codified law" in the 2018 study from Turner and colleagues that were not captured in our review of active state-level statutes or regulations. For example, while we did not identify statewide TTE policies in Alabama, Kansas, New Jersey, Texas, or Delaware, we did identify TTE guidance in four of those states. Our policy scan indicates that the national prevalence of state-level TTE policies is virtually unchanged in the last eight years.

Recent research highlights the relationship between scheduled lunch period length and students' seated TTE. Cohen et al, 2026, examined elementary school lunch periods in 20 schools across Arizona, California, Connecticut, and Massachusetts, and found that longer lunch periods were associated with greater average TTE.³² Among the lunch periods observed (20, 25, and 30 minutes), students with 30-minute lunch periods had the highest average seated time, and 89% met CDC recommendations for seated time. These findings suggest that a 30-minute lunch period can be considered a best practice for supporting at least 20 minutes of seated TTE, though it does not guarantee that CDC recommendations will be met in all settings. Connecticut, the only state in the study with a statewide TTE policy requiring a minimum lunch duration, had both the highest average seated time and the greatest number of schools offering 30-minute lunch periods. While this research does not establish the effectiveness of a TTE policy, it suggests that statewide TTE requirements may be associated with structural conditions that support increased TTE.

Operational considerations are critical to successful implementation. The Center for Ecoliteracy identifies best practices to support sufficient TTE, including additional points of service and multiple points of sale.³³ However, a 2025 report from the School Nutrition Association found that the majority of school nutrition professionals interviewed are facing "moderate" or "significant" operational challenges, including labor costs (94.9%), equipment costs (91.4%), and staff shortages (88.7%).³⁴ These challenges may be more acutely felt in states and districts experiencing increased meal participation associated with Healthy School Meals for All (HSMFA) policies, as higher participation can place additional demands on existing foodservice infrastructure.

Many states leave decisions about mealtime scheduling to localities (i.e., schools, districts, school food authorities). Effective implementation of local TTE policies requires consideration and buy-in from multiple stakeholders, including food service staff, teachers' unions, and school administrators. During data collection, several state agencies reported that the absence of a statewide TTE policy or guidance reflected a state priority of local decision-making. Specifically, 10 states self-identified as "local control" states, and two additional states reported that mealtime scheduling was a "local decision." In these states, local school boards, not the state department of education, are responsible for developing policies that comply with state and federal law. Additionally, at least three state agencies provide guidance on TTE in their model [local wellness policy](#). These findings suggest that while state level policy may have a greater reach than local level policy, advocating for sufficient TTE at the local level may be the best avenue for policy change in the states that lean towards local control.

Of note, states vary considerably in how they monitor and enforce TTE policies. In light of recent research showing schools in Connecticut, a state with annual review of lunch schedules and timing, had the highest prevalence of 30-minute lunch periods among states studied, its enforcement mechanisms may offer a potential model for other states seeking to ensure sufficient TTE. However, further research is needed to determine which enforcement strategies are the most effective.

- ▶ The Connecticut State Department of Education's (CSDE) Bureau of Child Nutrition enforces state and federal regulations related to lunch timing and duration through multiple mechanisms, including annual approval of school meal schedules, review of local educational agency's (LEA's) requests for scheduling variances, and evaluation of lunch periods as part of the federally mandated Administrative Review period.

Broader policy context also shapes state action on TTE. State and local agencies are required to comply with federal laws pertaining to school mealtime scheduling; however, current federal regulations only specify the timing of meals, not the duration. Many states reported that they do not have a statewide TTE policy because it is not currently a federal requirement.

One state agency stated,

“If the USDA sent a policy memo and guidance to specify that students have 20 minutes seat time during meals, we would follow the policy and guidance.”

Other states noted that they do not have the statutory authority from their state legislature to make TTE specifications.

| Policy Recommendations

Based on our findings, to facilitate students having sufficient time to consume nutritious meals and reduce food waste, we recommend CDC’s recommendation (30 minutes lunch period and 20 minutes of seated time) be elevated and operationalized in the following ways:

- 1** At the federal level, USDA should publish guidance recommending states and districts require and implement CDC recommendations.
- 2** At the state level, state legislatures should pass policies requiring CDC’s recommendations be implemented.
- 3** At the local level, Local Education Agencies (LEA) and school districts should include language in local wellness policies requiring CDC recommendations be implemented. At a minimum, CEP participating schools and/or districts should follow these recommendations. Additionally, LEAs should provide scheduling and logistical support to teachers and school foodservice personnel to support implementation.

| Limitations

The first limitation is that we did not receive email responses from 10 states, which limited our ability to verify that the data collected were current.

Another limitation of this study is that we did not explore the timing of lunch periods with respect to recess. Research shows that the time of day that meals are served is associated with how much of the meals students consume.³⁵ Similarly, research suggests that recess before lunch is associated with reduced plate waste and increased student consumption of food.^{36,37} We posit that policies combining timing and duration of lunch would be more effective than policies on duration alone.

FUTURE RESEARCH NEEDS

Future research should further investigate the relationship between meal period length and the actual time students have to eat breakfast and lunch, in both states with and without HSMFA policies and districts with and without CEP. School- and district-level studies are needed to evaluate the impacts of these policies and guidance documents and to determine which enforcement method(s) are the most effective for increasing students’ TTE, and in turn, improving consumption and reducing plate waste. Research should also examine the relationship between state-level TTE policy and local TTE policy, specifically in local wellness policies, to determine whether one or the other is more effective in ensuring that students have enough TTE their school meals.

Nationally representative, up-to-date data are essential to inform these efforts. The USDA School Nutrition and Meal Cost Study (SNMCS) remains the most robust, nationally representative data available on school nutrition, but data from the last published version was collected in School Year 2014-2015. To support evidence-based policymaking and evaluation of both state and local TTE policies, the USDA should prioritize releasing a robust update to SNMCS that includes state-level data.

| Conclusions

TTE is a critical yet often overlooked component of school nutrition policy, with implications for students' meal consumption, food waste, and overall student well-being. Our review found that just 12 jurisdictions (24%) had either a policy or guidance that aligned with CDC TTE recommendations for at least one meal. Among jurisdictions with policies, enforcement varies widely, with Connecticut demonstrating the most robust approach. While research suggests that longer lunch periods—particularly 30-min lunch periods—can help students achieve CDC-recommended seated time, many states defer to localities, and operational challenges such as staffing, point-of-sale systems are important considerations for implementation.

As more states expand access to school meals through HSMFA policies, ensuring adequate seat time becomes even more relevant. Coordinated action at the federal, state, and local levels, combined with up-to-date nationally representative data, will be essential to guide evidence-based policy, monitor compliance, and maximize student consumption of nutritious school meals.

For questions about this report, please contact policy@cspi.org.

Appendix A: Selected Characteristics of State TTE Policies (n= 15) and Guidance (n= 29), 2026

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Alabama	None identified	N/A	N/A	The Alabama Implementation of USDA Smart Snacks in School and Fundraising Activities Nutrition Implementation Guidelines state, "After being seated with their meal, students must have a minimum of 15-20 minutes to consume their meal." ³⁸	Not specified	Strong
Alaska	None identified	N/A	N/A	The Alaska Department of Education & Early Development Administrative Handbook states, "Schools are encouraged to provide sufficient lunch periods that give all students enough time to be served and to eat their lunches; at least ten minutes after receiving breakfast and twenty minutes after receiving lunch." ³⁹	Breakfast and Lunch	Moderate
Arizona	None identified	N/A	N/A	The Arizona Department of Education School Nutrition Program Guidance Manual "encourages schools to provide sufficient lunch periods that are long enough to give all students adequate time to be served and to eat their lunches." ⁴⁰	Lunch	Weak
California ^a	Cal. Ed. Code § 49501.5 requires a school district, county superintendent of schools, or charter school maintaining kindergarten or any of grades 1 to 12, inclusive, shall make available a nutritionally adequate breakfast and a nutritionally adequate lunch free of charge and with adequate time to eat. ⁴¹	Breakfast and Lunch	Weak	The California Department of Education (CDE) website recommends that "students have at least 10 minutes to eat breakfast and 20 minutes to eat lunch once they are seated." ⁴²	Breakfast and Lunch	Moderate
Colorado	Colo. Rev. Stat. § 22-32-136(3) provides that: On or before July 1, 2006, each school district board of education is encouraged to adopt policies ensuring that: (a) each student has access to healthful food choices in appropriate portion sizes throughout the school day. At a minimum, this includes the provision of: (I) Healthful meals in the school cafeteria made available to students with an adequate time to eat. ⁴³	Breakfast and Lunch	Weak	The Colorado Department of Education "provide[s] best practices to the field regarding time to eat. In Colorado, when there isn't a policy in place via federal or state legislation, districts have discretion on whether or not they implement those best practices (Brehan Riley, MS, RD, SNS, email communication, July 2025)."	Not specified	Weak
Connecticut	Conn. Gen. Stat. § 10-221o requires each local and regional board of education shall require each school under its jurisdiction to (1) offer all full day students a daily lunch period of not less than twenty minutes. ⁴⁴	Lunch	Moderate	The Connecticut State Department of Education Guide to Meal Service Requirements for Grades K-12 in the National School Lunch Program and School Breakfast Program recommends that "scheduled mealtimes provide students with at least 10 minutes to eat after sitting down for breakfast." ⁴⁵ The guide also reiterates that "C.G.S. Section 10-221o requires that all public schools must provide a minimum 20-minute daily lunch period for full-day students" and provides several "meal schedule resources."	Breakfast and Lunch	Moderate

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
District of Columbia	D.C. Code § 38-822.03 provides: Public schools, public charter schools, and participating private schools shall...Provide at least 30 minutes for students to eat lunch and sufficient time during the lunch period for every student to pass through the food service line. ⁴⁶	Lunch	Strong	The Office of the State Superintendent of Education presents the requirement at the annual School Meals Programs training (Rachel Sadlon, MPH, CHES, email communication, August 2025).	Lunch	Strong
Florida	Fla. Stat. § 595.405 provides: Each school operating a breakfast program shall...allow the student at least 15 minutes to eat the breakfast. ⁴⁷ Fl. Admin. Code § 5P-2.002 provides: Meal Service Times. School Nutrition Program lunches must be served in accordance with the timing requirements specified in 7 CFR 210.10(l)(1), incorporated in Rule 5P-2.001, F.A.C. Schools must offer breakfasts meeting the requirements of 7 CFR 220.8(l)(1), incorporated in Rule 5P-2.001, F.A.C., at or near the beginning of the school day. Schools must provide sufficient meal periods that are long enough to give all students time to be served and to eat their meals. ⁴⁸	Breakfast and Lunch	Strong	The Florida Department of Agriculture and Consumer Services offers a Model Local School Wellness Policy that includes the following provision: "Students will be provided an adequate amount of time to consume their meal with a minimum of 20 minutes after receiving their food from the line." ⁴⁹	Not specified	Strong
Hawaii	None identified	N/A	N/A	The Hawaii State Department of Health Recess Before Lunch Toolkit recommends that schools "Allow adequate time for the students to play and to eat lunch (a minimum of 20 minutes is recommended from the time students are seated). Keep in mind that the younger students require more time to get through the serving line and to eat." ⁵⁰	Lunch	Moderate
Illinois	None identified	N/A	N/A	The Illinois State Board of Education School Nutrition Programs Administrative Handbook notes that "The USDA recommends students are given enough time to eat and socialize, at least ten minutes after receiving breakfast and at least twenty minutes after receiving lunch." ⁵¹	Breakfast and Lunch	Moderate
Indiana	None identified	N/A	N/A	The Indiana Healthy Schools Toolkit states, "The CDC cites four ways to encourage students to participate in school meal programs...[including] ensuring students have adequate time to eat their meals (10 minutes for breakfast and 20 minutes for lunch)." Further, it recommends ensuring adequate time (20 minutes) for students to eat, as a tip for "making the change" towards offering recess before lunch. ⁵²	Breakfast and Lunch	Moderate

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Iowa	None identified	N/A	N/A	The Iowa Department of Education Time to Eat School Meals fact sheet includes the recommendations from USDA and the American Academy of Pediatrics. It also offers several strategies for increasing time to eat school meals and considerations for each. Lastly, it concludes, "Adjustments to the school day schedule do not happen often, but when they do, make sure there is ample time for school breakfast and lunch [...] There is not a one size fits all when it comes to the amount of time." ⁵³	Lunch	Moderate
Kansas	None identified	N/A	N/A	The Kansas State Department of Education (KSDE) Food Service Facts states, "while it is the responsibility of each sponsor to determine the length of its meal periods, KSDE has established the following guidelines [...] provide students adequate time to eat." Further, it recommends allowing "a minimum of 15 minutes from the time a student receives a lunch until he/she is required to leave the food service area. KSDE recommends allowing at least 25 minutes for students to get lunch, eat and pass to class." For breakfast, it recommends allowing "a minimum of 10 minutes from the time a student receives a breakfast until he/she is required to leave the food service area. KSDE recommends allowing at least 20 minutes for students to get breakfast, eat, and pass to class. For schools electing to offer breakfast via an innovative breakfast delivery model, the amount of time required can be reduced if students are permitted to eat in the classroom or other common areas." Lastly, it states, "Sponsors are encouraged to adopt policy allowing longer meal times." ⁵⁴	Breakfast and Lunch	Moderate

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Kentucky	<p>Ky. Rev. Stat. § 158.070 provides that: Notwithstanding the provisions of KRS 158.060(4) and the provisions of subsection (2) of this section, a school district shall arrange bus schedules so that all buses arrive in sufficient time to provide breakfast prior to the beginning of the student attendance day. The superintendent of a school district that participates in the Federal School Breakfast Program may also authorize up to fifteen (15) minutes of the student attendance day to provide the opportunity for children to eat breakfast during instructional time.⁵⁵</p> <p>702 Ky. Admin. Reg. § 6:060 provides that: The school lunch period, if a part of a closed schedule, shall allow adequate time for each child to take care of his personal hygiene and enjoy a complete meal in an educational setting and the school breakfast period shall be a part of the school day that also allows adequate time for each child to enjoy a complete breakfast.⁵⁶</p>	Breakfast and Lunch	Weak	None identified	N/A	N/A
Massachusetts	<p>Mass. Gen. Laws Ch. 111, § 223(d)(iii) provides: The department, in collaboration with the department of elementary and secondary education, shall assist public schools...the assistance may include...recommendations on the duration of school lunch periods.⁵⁷</p>	Lunch	Weak	The Healthy Students, Healthy Schools guidance, developed by the Massachusetts Department of Public Health, Massachusetts Department of Elementary and Secondary Education, and others states: "recommend that students be provided with at least 10 minutes to eat after sitting down for breakfast and 20 minutes after sitting down for lunch." ⁵⁸	Breakfast and Lunch	Moderate

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Michigan	None identified	N/A	N/A	<p>The Michigan Department of Education (MI DOE) issued a memorandum to Local and Intermediate School District Superintendents Public School Academy Directors that included recommended strategies for increasing time to eat. One recommendation stated: "Adjust the duration of meal periods: add additional time to meal service to ensure students have enough time to eat. The Center for Disease Control and Prevention (CDC) recommends at least 10 minutes of seat time with a meal for breakfast and at least 20 minutes of seat time for lunch."⁵⁹</p> <p>The MI DOE Local Wellness Policy Sample Goals includes two relevant sample goals: 1) "The school shall provide at least thirty (30) minutes daily for students to eat"; and 2) After obtaining food, students will have at least 20 minutes to eat lunch."⁶⁰</p>	Breakfast and Lunch	Strong
Mississippi	07-000-003 Miss. Code. R. § 38.11 provides: Schools shall schedule a minimum of 24 minutes to ensure an adequate eating time for school lunch. The factors influencing the lunch period are wait time, consumption time, standard deviation/variability and social time. ⁶¹	Lunch	Moderate	None identified	N/A	N/A
Nevada	None identified	N/A	N/A	<p>The Nevada School Wellness Policy includes the following language: "It is the intent of this policy to allow each student adequate time to eat their meals; therefore, time spent acquiring the meal is not included in the time to consume the meal.</p> <p>Each LEA shall:</p> <ul style="list-style-type: none"> • Provide at least 15 minutes for each student to consume the breakfast meal (providing the school offers breakfast); and • Provide at least 20 minutes for each student to consume the lunch meal."⁶² 	Breakfast and Lunch	Strong
New Hampshire	N.H. Code of Admin. Rules Ed. 306.10(k) states that students shall be provided with an adequate time to consume meals in each elementary, middle, and high school in accordance with the federal Child Nutrition and WIC Reauthorization Act of 2004 (Public Law 108- 265). ⁶³	Breakfast and Lunch	Weak	The New Hampshire Department of Education Technical Advisory notes that if a school elects to serve breakfast, the meal must be provided during school hours and students must be provided with adequate time to consume the meal. ⁶⁴	Breakfast	Weak

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
New Mexico	Both N.M. Stat. § 22-13C-10 and N.M. Admin. Code § 6.12.16.8(D)(2) provide that all students, kindergarten through grade five, shall have up to 20 minutes of seat time to eat lunch. Schools shall provide sufficient lunch periods that are long enough to give all students adequate time to eat. ^{65,66}	Lunch	Moderate	The New Mexico Public Education Department 2025 Healthy Universal School Meals Guidance states, "The required food waste reduction strategies in the HUSM program include: Twenty (20) Minute Seat Time: permitting students in grades kindergarten through fifth grade to have at least twenty minutes of seated lunchtime at each school, providing all students with adequate time to eat." ⁶⁷	Lunch	Strong
New York	N.Y. Ed. § 813 provides: Each school shall schedule a reasonable time for each full day pupil attending pre-kindergarten through grade twelve to consume lunch. ⁶⁸	Lunch	Weak	A memorandum published by the New York State Education Department states: "[New York State law] requires each school to schedule a reasonable time for every student attending pre-kindergarten through grade twelve to consume lunch[...]" ⁶⁹	Lunch	Weak
North Carolina	None Identified	N/A	N/A	The North Carolina Department of Public Instruction 2022-2023 Agreement Renewal to Administer the Federally Assisted School Nutrition Programs includes the following language: "provide sufficient meal periods that are long enough to give all students adequate time to consume breakfast and lunch meals or a minimum of fifteen (15) minutes of seat time to consume breakfast and a minimum of twenty (20) minutes of seat time to consume lunch." ⁷⁰	Breakfast and Lunch	Strong
Oregon	None identified	N/A	N/A	The Oregon Department of Education "educate[s] LEAs on the benefits to students and staff of setting a minimum of 20 minutes to eat," and "also strongly encourage LEAs to include language about seat time in their local school wellness policies (Mari Adatto MAT, email communication, August 2025)."	Not specified	Moderate
South Carolina	S.C. Code of Laws § 59-10-350 states that each elementary school shall provide students a minimum of twenty minutes to eat lunch once they have received their food. In determining the total length of the lunch period, time to and from the cafeteria, time to go through the line, and time to bus trays at the end of lunch must be considered. ⁷¹	Lunch	Strong	The South Carolina Department of Education Nutrition Programs Reference Manual provides the following: "Lunch: A minimum of 15 to 20 minutes from the time a student is seated until they leave the cafeteria/dining area is recommended. For public and charter schools serving a K-5 population, the South Carolina Student Health and Fitness Act requires a minimum of 20 minutes for students to eat once served. According to student focus groups conducted in several South Carolina schools, anything less than 25 minutes is inadequate. Many students prefer to skip lunch rather than to stand in line and be rushed. Breakfast: A minimum of 10 to 20 minutes from the time a student is seated until they leave the cafeteria/dining area is recommended." ⁷²	Breakfast and Lunch	Strong

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Texas	None identified	N/A	N/A	<p>The Texas Association of School Boards Wellness Policy worksheet states, "the District shall allow sufficient time for students to eat meals in cafeteria facilities that are clean, safe, and comfortable."⁷³</p> <p>The Texas Department of Agriculture's 2026 NSLP Handbook for administrators states, "USDA encourages sites to make every effort to establish meal periods that are long enough for students to fully consume their meals and to provide an environment conducive to eating those meals. It is important, both nutritionally and socially, to give students sufficient time, a conducive atmosphere, and a safe environment to eat nutritious meals."⁷⁴ The handbook mentions two peer-reviewed articles on "current research related to adequate meal service periods" as informational resources for administrators.</p>	Breakfast and Lunch	Weak
Utah	None identified	N/A	N/A	<p>The Utah State Board of Education Model Health & Wellness Policy provides: "Students shall be provided at a minimum 10 minutes for traditional breakfast and breakfast after the bell models and 20 minutes for lunch, which excludes time to arrive at the cafeteria and waiting in line."⁷⁵</p>	Breakfast and Lunch	Strong
Vermont	None identified	N/A	N/A	<p>The Vermont Agency of Education Local Wellness Policy Guide states: "Establish meal periods that provide adequate time to eat and are scheduled at appropriate hours."⁷⁶</p>	Breakfast and Lunch	Weak
Virginia	8 Va. Admin Code. § 20-580-10 provides: Students must be provided a minimum of 10 minutes to eat breakfast after the meal is served. ⁷⁷	Breakfast	Strong	<p>The Virginia Department of Education Model Local Wellness Policy states: "Students will be allowed adequate meal times counting from the time they have received their meal and are seated. Adequate meal times include at least 10 minutes to eat breakfast and at least 20 minutes to eat lunch"⁷⁸</p>	Breakfast and Lunch	Strong

State	Summary of Relevant TTE Policy Language	Meal(s) Covered by State Policy	CSPI Strength Rating	Summary of Relevant TTE Guidance	Meal(s) Covered by Guidance	CSPI Strength Rating
Washington	<p>Wash. Admin. Code § 392-157-125 provides: School breakfast and school lunch periods must allow a reasonable amount of time for each child to take care of personal hygiene and enjoy a complete meal.⁷⁹</p> <p>Lunch duration for grades kindergarten through five. Under Wash. Admin. Code § 392-157-125, beginning in the 2029-30 school year, schools must provide students in grades kindergarten through five the opportunity to eat lunch for a minimum of 20 minutes, once the students have received their food through the meal service line.⁸⁰</p>	Breakfast and Lunch	Strong	<p>A Washington Office of Superintendent of Public Instruction (OSPI) bulletin notified school business officials and food service supervisors of an update to seated lunchtime rulemaking, stating: "School breakfast and school lunch periods must allow a reasonable amount of time for each child to take care of personal hygiene and enjoy a complete meal. Lunch Duration for Grades K-5: Beginning in the 2029-30 school year, schools must provide students in grades K through 5 with the opportunity to eat lunch for a minimum of 20 minutes, once the students have received their food through the meal service line."⁸¹</p>	Breakfast and Lunch	Strong
Wisconsin	None identified	N/A	N/A	<p>School Nutrition Bulletin 2324-09 from the Wisconsin Department of Public Instruction states, "USDA regulations regarding meal service are general and indicate the following...Schools are encouraged to provide sufficient lunch periods that are long enough to give all students adequate time to be served and eat their lunches. ... In Wisconsin schools, meal-time length is determined at the local level. The specifics regarding the amount of time allowed for meal service at each grade level should be addressed in the Local Wellness Policy."⁸²</p>	Lunch	Weak
West Virginia	<p>W.V. Admin. Code § 126-86-8 provides that adequate time is necessary for student meal consumption. Each student shall be allowed a minimum of ten minutes for breakfast and 20 minutes for lunch after the student received the meal.⁸³</p>	Breakfast and Lunch	Strong	<p>The West Virginia Department of Education School Nutrition Programs' Operations Manual states, "WVDE State Board Policy 4321.1 requires that each student shall be allowed a minimum of 10 minutes for breakfast and 20 minutes for lunch after the student received the meal. Schools must provide access to meals to all students who are enrolled and present during meal services."⁸⁴</p>	Breakfast and Lunch	Strong

N/A, not applicable.

^a The representative from California stated via email, "Our web page on adequate time to eat is not guidance or policy- it is a resource of information, best practices, and tips to use as schools establish mealtimes. There is no current federal or state mandates for the amount of time allotted for breakfast and lunch meal periods."

Endnotes

- ¹ U.S. Department of Agriculture, Food and Nutrition Service. National School Lunch Program: Participation and Lunches Served. Updated April 10, 2026. Accessed May 7, 2026. <https://fns-prod.azureedge.us/sites/default/files/resource-files/slsummar-4.pdf>
- ² U.S. Department of Agriculture, Food and Nutrition Service. School Breakfast Program Participation and Meals Served. Updated April 10, 2026. Accessed May 7, 2026. <https://fns-prod.azureedge.us/sites/default/files/resource-files/sbsummar-4.pdf>
- ³ U.S. Department of Agriculture, Food and Nutrition Service. National School Lunch Program. January 2021. Accessed May 7, 2026. <https://www.fns.usda.gov/fns-101-nslp>
- ⁴ U.S. Department of Agriculture, Food and Nutrition Service. The School Breakfast Program. November 2017. Accessed May 7, 2026. <https://www.fns.usda.gov/sbp/factsheet>
- ⁵ Liu J, Micha R, Li Y, Mozaffarian D. Trends in Food Sources and Diet Quality Among US Children and Adults, 2003-2018. *JAMA Netw Open*. 2021;4(4):e215262. doi:10.1001/jamanetworkopen.2021.5262
- ⁶ Au LE, Gurzo K, Gosliner W, Webb KL, Crawford PB, Ritchie LD. Eating school meals daily is associated with healthier dietary intakes: the healthy communities study. *J Acad Nutr Diet*. 2018;118(8):1474-81. doi:10.1016/j.jand.2018.01.010
- ⁷ 77 FR 4088
- ⁸ 89 FR 31962
- ⁹ U.S. Department of Health and Human Services, Center for Disease Control and Prevention. Making Time for School Lunch. September 11, 2019. Accessed May 7, 2026. https://www.cdc.gov/healthy-schools/media/pdfs/310518-A_FS_SchoolLunchUpdate_508.pdf
- ¹⁰ U.S. Department of Health and Human Services, Center for Disease Control and Prevention. School Meals. July 23, 2024. Accessed May 7, 2026. <https://www.cdc.gov/school-nutrition/school-meals/index.html>
- ¹¹ Cohen JFW, Hecht AA, Hager ER, Turner L, Burkholder K, Schwartz MB. Strategies to improve school meal consumption: A systematic review. *Nutrients*. 2021;13(10):1-51. doi:10.3390/nu13103520
- ¹² Cohen J, Gombi-Vaca M, Chui K, et al. Associations between time to eat and school meal selection and consumption among elementary schools with varying lunch period lengths and free school meal policies. NOURISH Lab. January 2026. Accessed May 7, 2026. https://www.childnourishlab.org/_files/ugd/383bcd_e8d10051f8fc4627b4786fb15b4ba330.pdf
- ¹³ U.S. Department of Agriculture, Food and Nutrition Service. School Nutrition and Meal Cost Study: Study Design, Sampling and Data Collection (Summary). April 2019. Accessed May 7, 2026. https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Methods-Report-Summary_1.pdf
- ¹⁴ U.S. Department of Agriculture, Food and Nutrition Service. School Nutrition and Meal Cost Study Volume 4. April 2019. Accessed May 7, 2026. <https://fns-prod.azureedge.us/sites/default/files/resource-files/SNMCS-Volume4.pdf>
- ¹⁵ Cohen JFW, Jahn JL, Richardson S, Cluggish SA, Parker E, Rimm EB. Amount of Time to Eat Lunch Is Associated with Children's Selection and Consumption of School Meal Entrée, Fruits, Vegetables, and Milk. *J Acad Nutr Diet*. 2016 Jan;116(1):123-128. doi:10.1016/j.jand.2015.07.019
- ¹⁶ Cohen J, Gombi-Vaca M, Chui K, et al. Associations between time to eat and school meal selection and consumption among elementary schools with varying lunch period lengths and free school meal policies. NOURISH Lab. January 2026. Accessed May 7, 2026. https://www.childnourishlab.org/_files/ugd/383bcd_e8d10051f8fc4627b4786fb15b4ba330.pdf
- ¹⁷ Cohen J, Gombi-Vaca M, Chui K, et al. Associations between time to eat and school meal selection and consumption among elementary schools with varying lunch period lengths and free school meal policies. NOURISH Lab. January 2026. Accessed May 7, 2026. https://www.childnourishlab.org/_files/ugd/383bcd_e8d10051f8fc4627b4786fb15b4ba330.pdf
- ¹⁸ 7 C.F.R. § 210.10(l)(1).
- ¹⁹ 7 C.F.R. § 210.10(l)(2).
- ²⁰ U.S. Department of Health and Human Services, Center for Disease Control and Prevention. Time for Lunch. July 23, 2024. Accessed May 7, 2026. <https://www.cdc.gov/school-nutrition/school-meals/time-for-lunch.html>
- ²¹ Education Commission of the States. Instructional Time Policy 101. March 2021. Accessed May 7, 2026. <https://www.ecs.org/wp-content/uploads/Instructional-Time-Policy.pdf>
- ²² National Center for Education Statistics. Table 1.1. Minimum number of instructional days and hours in the school year, minimum number of hours per school day, and school start/finish dates, by state: 2020. Accessed May 7, 2026. https://nces.ed.gov/programs/statereform/tab1_1-2020.asp
- ²³ The Glossary of Education Reform. Local Control. Updated February 18, 2016. Accessed May 7, 2026. <https://www.edglossary.org/local-control/>
- ²⁴ Turner L, Leider J, Piekarz-Porter E, et al. State Laws Are Associated with School Lunch Duration and Promotion Practices. *J Acad Nutr Diet*. 2018;118(3):455-463. doi:10.1016/j.jand.2017.08.116
- ²⁵ Bylander, A. Healthy School Meals for All State Advocacy Guide: Reducing Childhood Hunger Through Innovative Policy. Food Research & Action Center. August 2025. Accessed May 7, 2026. <https://frac.org/wp-content/uploads/HSMFA-State-Advocacy-Guide.pdf>
- ²⁶ Cohen J, Gombi-Vaca M, Chui K, et al. Associations between time to eat and school meal selection and consumption among elementary schools with varying lunch period lengths and free school meal policies. NOURISH Lab. January 2026. Accessed May 7, 2026. https://www.childnourishlab.org/_files/ugd/383bcd_e8d10051f8fc4627b4786fb15b4ba330.pdf
- ²⁷ Centers for Disease Control and Prevention, National Center for HIV/AIDS, Viral Hepatitis, STD, and TB Prevention, Division of Adolescent and School Health. Results from the School Health Policies and Practices Study 2016. August 2017. Accessed May 7, 2026. <https://stacks.cdc.gov/view/cdc/48414>
- ²⁸ Turner L, Leider J, Piekarz-Porter E, et al. State Laws Are Associated with School Lunch Duration and Promotion Practices. *J Acad Nutr Diet*. 2018;118(3):455-463. doi:10.1016/j.jand.2017.08.116
- ²⁹ 7 CFR 210.18(c)
- ³⁰ Turner L, Leider J, Piekarz-Porter E, et al. State Laws Are Associated with School Lunch Duration and Promotion Practices. *J Acad Nutr Diet*. 2018;118(3):455-463. doi:10.1016/j.jand.2017.08.116
- ³¹ 14 Del. Admin. Code 852
- ³² Cohen J, Gombi-Vaca M, Chui K, et al. Associations between time to eat and school meal selection and consumption among elementary schools with varying lunch period lengths and free school meal policies. NOURISH Lab. January 2026. Accessed May 7, 2026. https://www.childnourishlab.org/_files/ugd/383bcd_e8d10051f8fc4627b4786fb15b4ba330.pdf
- ³³ Center for Ecoliteracy. Seven Proven Strategies to Increase Students' Time to Eat. September 19, 2023. Accessed May 7, 2026. <https://www.ecoliteracy.org/article/seven-proven-strategies-increase-time-eat>

- ³⁴ School Nutrition Association. SY 2024/25 School Nutrition Trends Report. 2025. Accessed May 7, 2026. <https://schoolnutrition.org/resource/position-paper-2025-trends-report/>
- ³⁵ Chapman LE, Cohen J, Canterbury M, Carton TW. Factors Associated with School Lunch Consumption: Reverse Recess and School “Brunch”. *J Acad Nutr Diet*. 2017;117(9):1413-1418. doi:10.1016/j.jand.2017.04.016
- ³⁶ Chapman LE, Cohen J, Canterbury M, Carton TW. Factors Associated with School Lunch Consumption: Reverse Recess and School “Brunch”. *J Acad Nutr Diet*. 2017;117(9):1413-1418. doi:10.1016/j.jand.2017.04.016
- ³⁷ McLoughlin GM, Edwards CG, Jones A, et al. School Lunch Timing and Children’s Physical Activity During Recess: An Exploratory Study. *J Nutr Educ Behav*. 2019;51(5):616-622. doi:10.1016/j.jneb.2019.01.006
- ³⁸ Alabama State Department of Education. Alabama Implementation of USDA Smart Snacks in School and Fundraising Activities. Updated March 27, 2015. Accessed January 23, 2026. <https://www.alabamaachieves.org/wp-content/uploads/2021/02/Smart-Snack-and-Fundraiser-Guidance-and-Implementation.pdf>
- ³⁹ Alaska Department of Education & Early Development. School Nutrition Programs Administrative Handbook School Year 2016-2017. 2016. Accessed January 23, 2026. https://education.alaska.gov/tls/cnp/NSLP/pdf/Administrative_Handbook.pdf
- ⁴⁰ Arizona Department of Education. School Nutrition Programs Guidance Manual. Updated March 12, 2020. Accessed January 23, 2026. <https://www.azed.gov/sites/default/files/2017/02/SNP%20Guidance%20Manual%202015-16Revised03122020.pdf?id=58adf4291130c10a4c1e8b27>
- ⁴¹ Cal. Ed. Code § 49501.5
- ⁴² California Department of Education. Ensuring Adequate Time to Eat. June 24, 2025. Accessed January 23, 2026. <https://www.cde.ca.gov/ls/nu/sn/timetoeat.asp#:~:text=The%20CDC’s%20%22Making%20Time%20for,enjoy%20their%20meals%20and%20socialize>
- ⁴³ Colo. Rev. Stat. § 22-32-136(3)
- ⁴⁴ Conn. Gen. Stat. § 10-221o
- ⁴⁵ Connecticut State Department of Education. Guide to Meal Service Requirements for Grades K-12 in the National School Lunch Program and School Breakfast Program. Updated February 2026. Accessed April 14, 2026. https://portal.ct.gov/-/media/sde/nutrition/mpg/guide_meal_service_nslp_sbp_k12.pdf?rev=89a978aab21d406bbabedcae17c7e889&hash=DB37A4164110D4B5F0C-848F7EA5F670C
- ⁴⁶ D.C. Code § 38-822.03
- ⁴⁷ Fla. Stat. § 595.405
- ⁴⁸ Fl. Admin. Code § 5P-2.002
- ⁴⁹ Florida Department of Agriculture and Consumer Services. Model Local School Wellness Policy. Updated February 2024. Accessed January 23, 2026. <https://www.fdacs.gov/content/download/116069/file/Model-Policy-District-%28updated-2.2024%29.docx>
- ⁵⁰ Hawaii State Department of Health. Recess Before Lunch Toolkit For Hawaii Schools. September 2009. Accessed January 23, 2026. <https://health.hawaii.gov/physical-activity-nutrition/files/2013/08/Recess-Before-Lunch-Toolkit.pdf>
- ⁵¹ Illinois State Board of Education. School Nutrition Programs Administrative Handbook. Updated April 29, 2022. Accessed January 24, 2026. <https://www.isbe.net/Documents/admin-handbook.pdf>
- ⁵² Indiana Department of Health Division of Nutrition & Physical Activity. Indiana Healthy Schools Toolkit. May 25, 2022. Accessed January 24, 2026. <https://www.in.gov/health/dnpa/files/5.25.22-Healthy-Schools-Toolkit.pdf>
- ⁵³ Iowa Department of Education. Time to Eat School Meals. January 2019. Accessed January 24, 2026. <https://educate.iowa.gov/media/4598/download?inline>
- ⁵⁴ Kansas State Department of Education. *Food Service Facts*. Updated April 2025. Accessed January 25, 2026. https://cnw.ksde.gov/docs/default-source/snp/snp---food-service-facts/chapters/chpt_4_meal_service_policies_04_2025.pdf?sfvrsn=246bb75a_3
- ⁵⁵ Ky. Rev. Stat. § 158.070
- ⁵⁶ 702 Ky. Admin. Reg. § 6:060
- ⁵⁷ Mass. Gen. Laws Ch. 111, § 223(d)(iii)
- ⁵⁸ Massachusetts Department of Public Health, Healthy Students, Healthy Schools: Revised Guidance for Implementing the Massachusetts School Nutrition Standards for Competitive Foods and Beverages. June 2012. Accessed January 24, 2026. <https://www.mass.gov/files/documents/2016/07/tq/school-nutrition-guide.pdf>
- ⁵⁹ Michigan Department of Education. Memorandum: Best Practices When Serving More School Meals. February 15, 2024. Accessed January 24, 2026. <https://www.michigan.gov/mde/-/media/Project/Websites/mde/Memos/2024/02/More-Time-to-Eat-Serving-More-Meals.pdf?rev=1f313b424b7846bdb578a57a17032b43>
- ⁶⁰ Michigan Department of Education. Local Wellness Policy Sample Goals. February 6, 2020. Accessed April 21, 2026. https://www.michigan.gov/mde/-/media/Project/Websites/mde/Year/2020/02/06/LWP_Sample_Goals_002.pdf?rev=68fbbaf7adef4c1782b-112bcb37840f&hash=F93E41779196E44EBA26A3D827B6653C
- ⁶¹ 07-000-003 Miss. Code. R. § 38.11
- ⁶² Nevada Department of Agriculture. Nevada School Wellness Policy. Updated December 2024. Accessed January 24, 2026. https://agri.nv.gov/uploadedFiles/agrinvgov/Content/Food/Wellness/2024%20Wellness%20Policy_1.15.2025_r.pdf
- ⁶³ N.H. Code of Admin. Rules Ed. 306.10(k)
- ⁶⁴ New Hampshire Department of Education. Technical Advisory: Food and Nutrition Programs—Meal Availability for all enrolled students. March 27, 2024. Accessed January 24, 2026. <https://www.education.nh.gov/sites/g/files/ehbemt326/files/inline-documents/sonh/technical-advisory-one-meal-available-rsa-189-11-a.pdf>
- ⁶⁵ N.M. Stat. § 22-13C-10
- ⁶⁶ N.M. Admin. Code § 6.12.16.8(D)(2)
- ⁶⁷ New Mexico Public Education Department. 2025 Healthy Universal School Meals Guidance. June 2025. Accessed January 24, 2026. <https://web.ped.nm.gov/wp-content/uploads/2025/06/2025-Healthy-Universal-School-Meals-Program-Guidance-FINAL.pdf>
- ⁶⁸ N.Y. Ed. § 813
- ⁶⁹ New York State Education Department & The University of the State of New York. Memorandum: Time for Lunch – Scheduling Lunch Periods. August 14, 2012. Accessed January 24, 2026. <https://www.cn.nysed.gov/content/time-lunch-scheduling-lunch-periods>
- ⁷⁰ North Carolina Department of Public Instruction. 2022-2023 Agreement Renewal to Administer the Federally-Assisted School Nutrition Programs. 2022. Accessed January 26, 2026.
- ⁷¹ S.C. Code of Laws § 59-10-350

- ⁷² South Carolina Department of Education. Nutrition Programs Reference Manual. 2020. Accessed January 24, 2026. <https://ed.sc.gov/districts-schools/health-and-nutrition/nutrition-program-administrative-resources/nutrition-programs-reference-manual/chapter-10-meal-service/>
- ⁷³ Texas Association of School Boards. Wellness Plan Template. 2019. Accessed January 24, 2026. <https://www.tasb.org/resources/local-wellness-policy-resources>
- ⁷⁴ Texas Department of Agriculture. NSLP Handbook: Administrator’s Reference Manual. Section 21. Meal Service. March 11, 2026. Accessed May 13, 2026. https://squaremeals.org/Portals/8/files/ARM/ARM_Section21_MealService_260311.pdf?ver=MzeusfpG_nA3zz...
- ⁷⁵ Utah State Board of Education. Model Health and Wellness Policy. March 2024. Accessed January 24, 2026. https://schools.utah.gov/cnp/cnp_snp/nslp/forms/Utah%20State%20Board%20of%20Education%20Model%20Health%20and%20Wellness%2005.03.2024.pdf
- ⁷⁶ State of Vermont Agency of Education. Local Wellness Policy Guide. Updated February 26, 2024. Accessed January 24, 2026. <https://education.vermont.gov/document/model-local-wellness-policy>
- ⁷⁷ 8 Va. Admin Code. § 20-580- 10
- ⁷⁸ Virginia Department of Education. Local School Wellness Policy. 2025. Accessed January 24, 2026. <https://www.doe.virginia.gov/programs-services/school-operations-support-services/school-nutrition/training-resources>
- ⁷⁹ Wash. Admin. Code § 392-157-125
- ⁸⁰ Wash. Admin. Code § 392-157-125
- ⁸¹ Reykdal C. Bulletin No. 012-25 Child Nutrition Services. Washington Office of Superintendent of Public Instruction. February 21, 2025. Accessed January 25, 2026. https://ospi.k12.wa.us/sites/default/files/2025-02/bulletin_012-25-seated-lunchtime.pdf
- ⁸² Wisconsin Department of Public Instruction. School Nutrition Bulletin 2324-09. October 4, 2023. Accessed January 25, 2026.
- ⁸³ W.V. Admin. Code § 126-86-8
- ⁸⁴ West Virginia Department of Education. School Nutrition Programs’ Operations Manual. June 2022. Accessed January 25, 2026. <https://wvde.us/sites/default/files/2022/06/School-Nutrition-Program-Operations-Manual.pdf>