

Arizona Healthy Schools Act

ARIZONA HEALTHY SCHOOLS ACT

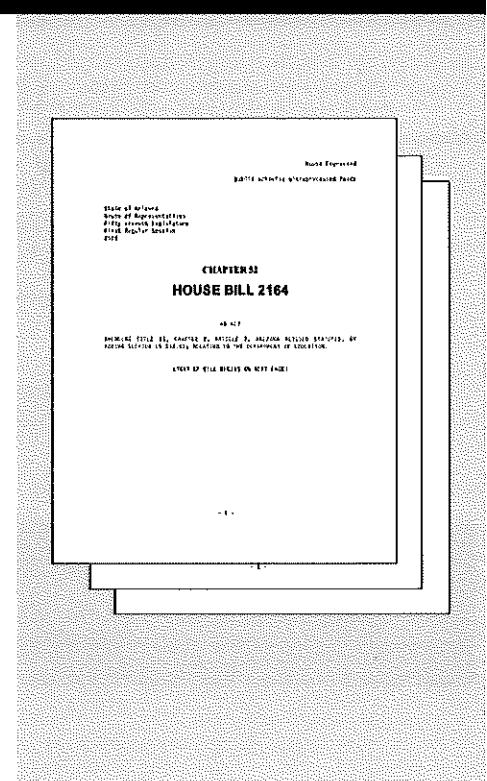
Arizona Healthy Schools Act, prohibits public schools participating in federally funded or assisted meal programs from serving, selling, or allowing a third party to sell ultraprocessed food on the school campus during the regular school day.

This new law led to the amendment of Title 15, Chapter 2, Article 2, Arizona Revised Statutes, by adding Section 15-242.01 (ARS 15-242.01).

The new law takes effect at the start of the 2026-2027 school year, giving schools over a year to review products sold and served on campus and to remove items that contain one or more ingredients prohibited by law.



ARS 15-242.01 does not prevent a student's parent or guardian from providing ultra-processed food to the student during the regular school day.



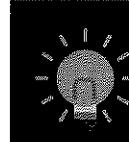
Arizona Healthy Schools Act

DEFINING ULTRA-PROCESSED FOODS

Arizona schools on the National School Lunch Program (NSLP) and School Breakfast Program (SBP) are already required to meet federal guidelines for school meals. These standards limit calories, sodium, and unhealthy fats and mandate the inclusion of fruits, vegetables, and whole grains.

The law enhances the initiatives already in place by the NSLP and the SBP by focusing on the specific group of food additives that are not presently banned from federal regulations. The law defines ultra-processed foods as those with the following ingredients:

- potassium bromate;
- propylparaben;
- titanium dioxide;
- brominated vegetable oil;
- yellow dye 5 or 6;
- blue dye 1 or 2;
- green dye 3; or
- red dye 3 or 40.



LEA's must adhere to serving foods that do not contain the 11 specified food additives in lunches, vending machines, snack bars, and school stores during the regular school day.

Arizona Healthy Schools Act

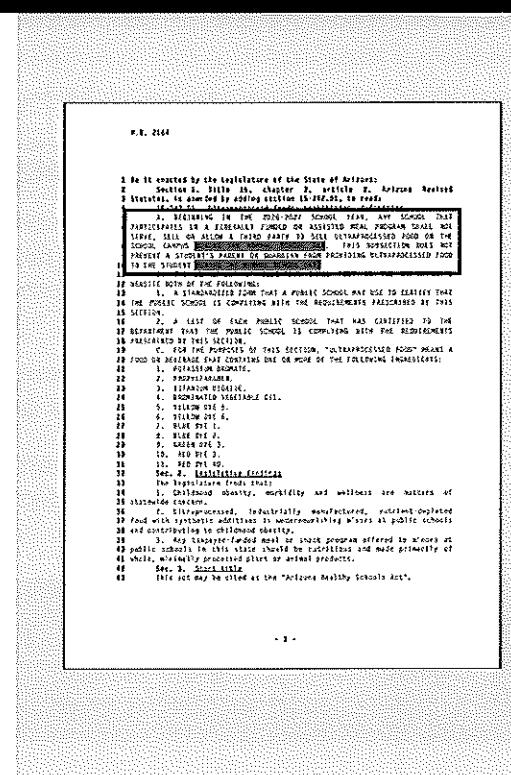
DEFINING SCHOOL DAY

A school day, for the applicability of this law, is defined in Smart Snacks and Arizona Nutrition Standards guidance as: midnight before to 30 minutes after the end of the instructional day.

Additional information on Smart Snacks and the Arizona Nutrition Standards can be found in memorandum [HNS 04-2015](#).



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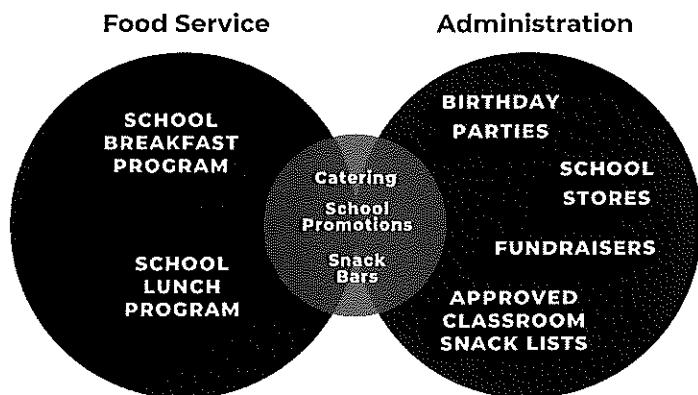


Arizona Healthy Schools Act

COMPLIANCE

ARS 15-242.01 is not specific to school meal service. Compliance is required in all areas of administration.

- Food service can be helpful to other areas of the school/district in identifying the ultra processed ingredients, but compliance must be adhered to at an LEA-wide level, not solely in school meals.
- School Administration must comply with the requirements of ARS 15-242.01.
- Schools are defined in ARS 15-101, which eliminates the federally funded Child Nutrition Programs (CNPs) that are not schools from having to comply (i.e., preschool and Child and Adult Care Food Program (CACFP) operators)

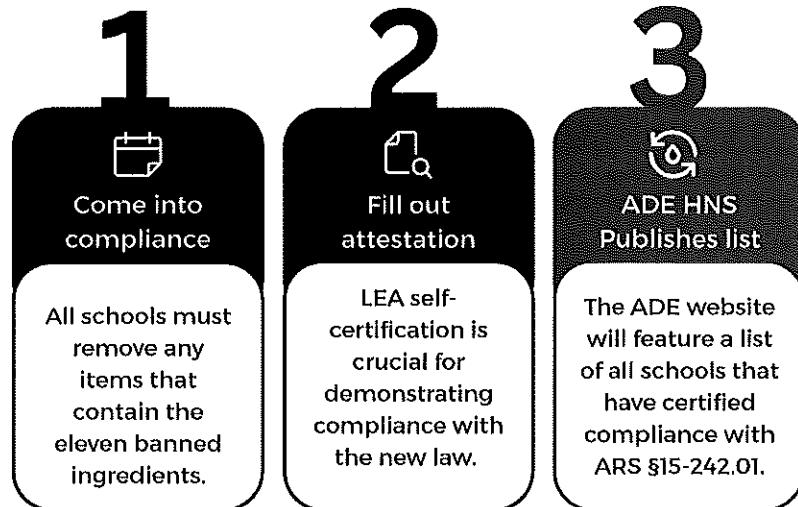


Arizona Healthy Schools Act

COMPLIANCE

ARS 15-242.01 is both a regulatory change and a student health initiative designed to maximize the health benefits of Arizona students.

Going forward, all school operations that involve food must be in compliance with the new regulations. Schools have until the start of the 2026-2027 school year to fulfill this requirement. However, ADE strongly recommends that operators begin this process as soon as possible to ensure they do not fall out of compliance in the future.



Arizona Healthy Schools Act

EVALUATING FOODS

Foods often contain ultra-processed ingredients for several reasons tied to manufacturing: shelf life, cost, and consumer expectations.

Packaged products found in stores or vending machines are the most common sources of the 11 banned ingredients. These items typically depend on additives, artificial colors, and preservatives to ensure shelf life and visual appeal, which may make them a potential risk compared to freshly prepared foods.

Going forward all schools will need to do this and remove any items that have the 11 banned ingredients.



ARS 15-242.01 does not prevent a student's parent or guardian from providing ultra-processed food to the student during the regular school day.



ASSESSMENT OF COMPLIANCE

Questions regarding compliance with ARS 15-242.01 should be directed to each LEA's Administration.

Administrators are encouraged to clarify questions regarding compliance scenarios by referencing the relevant statutory language.

RECOMMENDED NEXT STEPS

- **Conduct a Compliance Audit:** Inventory all food/beverage sources on campus; compare ingredients to the banned-ingredient list.
- **Train Staff & Vendors:** Educate cafeteria, vending, store, and event personnel to identify disallowed ultra-processed foods.
- **Submit Certification:** Complete the attestation to confirm compliance status.
- **Update Community Communication:** Provide clear guidance to the public and external vendors on prohibited items.
- **Monitor Ongoing Compliance:** Review new products, fundraising plans, and third-party sales ahead of events.

Arizona Healthy Schools Act

COMMON ITEMS QUICK GUIDE

To assist in compliance, here are common items that may not meet the requirements of ARS 15-242.01

Potassium Bromate	Propylparaben	Titanium Dioxide	Brominated Vegetable Oil	Yellow Dyes 5 & 6	Blue Dyes 1 & 2	Green Dye 3	Red Dye 3	Red Dye 40
Commercial breads, rolls, hamburger buns	Packaged baked goods (tortillas, cookies, cinnamon rolls)	Frostings, icings, white glazes, ice cream, yogurt	Citrus-flavored sodas	Gummies, fruit snacks, gelatin desserts	Colored candies, ice pops, yogurts, ice creams, frostings	Candies, dessert gels, drinks	Candied cherries	Candies, cake mixes, frosting
Pizza crusts	Packed snacks and trail mixes	Candies, chewing gum, confections	Select sports drinks	Bright colored cereals, chips, crackers	Blue colored cereals, baked goods	Ice cream, baked goods	Candy canes, gelatins, strawberry flavored dessert	Soft drinks, sport drinks
Some crackers & pastries	Packaged dry sausage	Powdered mixes, soups, snack bars	Select energy drinks and citrus punches	Soft drinks, energy drinks, sauces, salad dressing	Select sodas, energy drinks, and sports drinks	Canned vegetables, salad dressing	Cake mixes, fruit snacks	Yogurt, cereal, red sauces

Arizona Healthy Schools Act

EVALUATING FOODS

MENUS	<p>Start by analyzing current school menus.</p> <ul style="list-style-type: none"> • Schools must review and revise menus to eliminate the 11-banned ingredients.
À LA CARTE ITEMS OR SNACK BAR ITEMS	<p>Schools serving à la carte items or snack bar items that are not part of the school meal menus must review and revise quick service items to eliminate banned ingredients.</p>
SCHOOL STORES AND VENDING MACHINES	<p>Schools that sell food items in stores or vending machines must evaluate these food items and eliminate those with banned ingredients.</p> <p>School stores and vending machines are typically not stocked by school food services. Those who stock and sell these items in the school must be made aware of and adhere to the regulations in ARS 15-242.01.</p>
FUNDRAISERS	<p>Analyze all school fundraisers to ascertain compliance with ARS 15-242.01.</p>

Arizona Healthy Schools Act

FUNDRAISERS

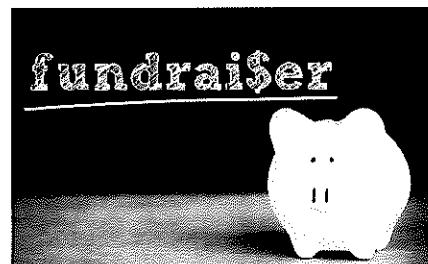
All competitive food sold on the school campus during the school day must meet Smart Snacks standards. This includes foods sold as a fundraiser.

Currently, ADE HNS's fundraiser policy explains that food-related fundraisers must:

- Be infrequent, single events of duration not exceeding one week; and
- Not be in competition with school meals in the food service area during meal service.

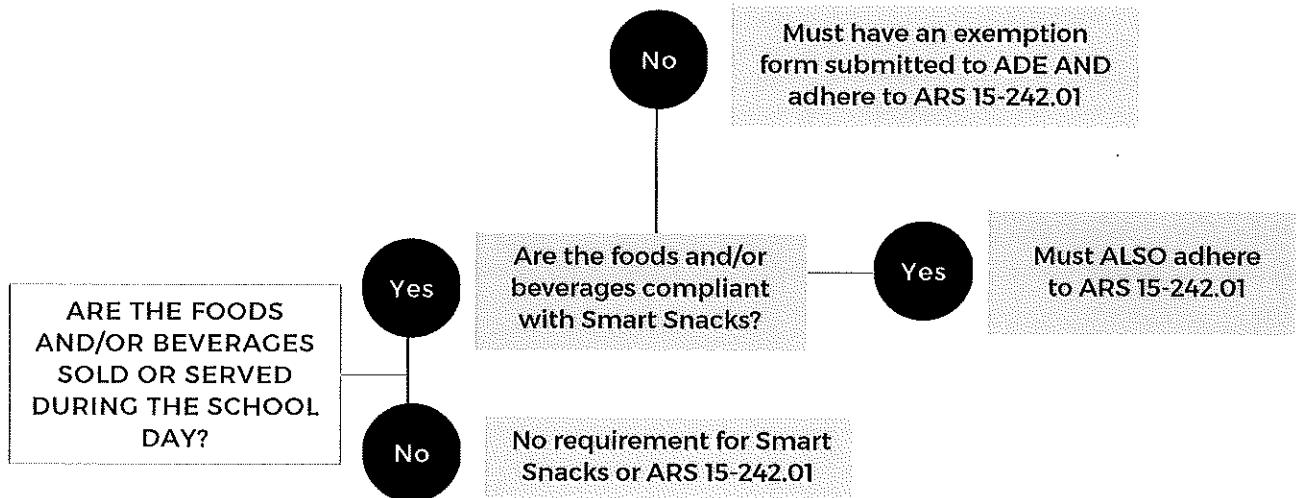
It also states that SFAs may request an exemption for up to 75 fundraisers involving foods/beverages that do not meet the Smart Snacks guidelines.

ARS 15-242.01 requirements are not exempted. The exemption only allows for food/beverages that do not meet Smart Snacks guidelines. Exempted fundraiser food must still comply with ARS 15-242.01.



Arizona Healthy Schools Act

FUNDRAISERS DECISION TREE



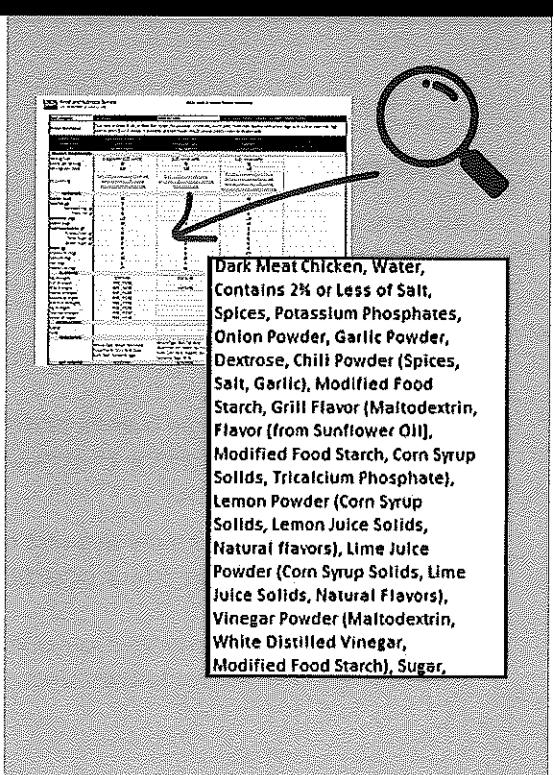
Arizona Healthy Schools Act

USDA FOODS COMPLIANCE

The foods available for direct delivery via USDA Foods are being reviewed for compliance with ARS 15-242.01. Only foods that are compliant will be available to schools in the 2026-2027 school year.

Schools that choose to process their USDA Foods into other end-products will be required to review each food label for compliance with ARS 15-242.01.

Department of Defense (DoD) Fresh foods are compliant as they do not contain added ingredients.



Arizona Healthy Schools Act

SELF-CERTIFICATION

ADE is creating a standardized attestation for schools to certify compliance with ARS 15-242.01.

To demonstrate and certify compliance, LEAs must:

1. Use the standardized attestation provided by the Arizona Department of Education (ADE).
2. Submit the attestation to ADE.
3. Continue to meet existing federal guidelines under the National School Lunch Program (NSLP) and School Breakfast Program (SBP).

Annual self-certification should be at the LEA level.*

School administrators should aim to comply by the start of the 2026-2027 school year.*



ARS 15-242.01 does not prevent a student's parent or guardian from providing ultra-processed food to the student during the regular school day.

2



Fill out
attestation

LEA self-
certification is
crucial for
demonstrating
compliance with
the new law.

Arizona Healthy Schools Act

LIST OF COMPLIANT SCHOOLS

The ADE website will feature a publicly accessible list of all schools that have certified compliance with ARS §15-242.01.

LEAs must:

- Complete an attestation provided by the Arizona Department of Education (ADE).
- Attest annually to demonstrate compliance.
- Be listed on ADE's public registry of compliant schools.

Annual self-certification should be at the LEA level.*

School administrators should aim to comply by the start of the 2026-2027 school year.*

3



ADE HNS
Publishes list

The ADE website
will feature a list
of all schools that
have certified
compliance with
ARS §15-242.01.

House Engrossed

public schools; ultraprocessed foods

State of Arizona
House of Representatives
Fifty-seventh Legislature
First Regular Session
2025

CHAPTER 52
HOUSE BILL 2164

AN ACT

AMENDING TITLE 15, CHAPTER 2, ARTICLE 2, ARIZONA REVISED STATUTES, BY
ADDING SECTION 15-242.01; RELATING TO THE DEPARTMENT OF EDUCATION.

(TEXT OF BILL BEGINS ON NEXT PAGE)

1 Be it enacted by the Legislature of the State of Arizona:

2 Section 1. Title 15, chapter 2, article 2, Arizona Revised

3 Statutes, is amended by adding section 15-242.01, to read:

4 15-242.01. Ultraprocessed foods; prohibition; definition

5 A. BEGINNING IN THE 2026-2027 SCHOOL YEAR, ANY SCHOOL THAT

6 PARTICIPATES IN A FEDERALLY FUNDED OR ASSISTED MEAL PROGRAM SHALL NOT

7 SERVE, SELL OR ALLOW A THIRD PARTY TO SELL ULTRAPROCESSED FOOD ON THE

8 SCHOOL CAMPUS DURING THE NORMAL SCHOOL DAY. THIS SUBSECTION DOES NOT

9 PREVENT A STUDENT'S PARENT OR GUARDIAN FROM PROVIDING ULTRAPROCESSED FOOD

10 TO THE STUDENT DURING THE NORMAL SCHOOL DAY.

11 B. THE DEPARTMENT OF EDUCATION SHALL POST ON THE DEPARTMENT'S

12 WEBSITE BOTH OF THE FOLLOWING:

13 1. A STANDARDIZED FORM THAT A PUBLIC SCHOOL MAY USE TO CERTIFY THAT

14 THE PUBLIC SCHOOL IS COMPLYING WITH THE REQUIREMENTS PRESCRIBED BY THIS

15 SECTION.

16 2. A LIST OF EACH PUBLIC SCHOOL THAT HAS CERTIFIED TO THE

17 DEPARTMENT THAT THE PUBLIC SCHOOL IS COMPLYING WITH THE REQUIREMENTS

18 PRESCRIBED BY THIS SECTION.

19 C. FOR THE PURPOSES OF THIS SECTION, "ULTRAPROCESSED FOOD" MEANS A

20 FOOD OR BEVERAGE THAT CONTAINS ONE OR MORE OF THE FOLLOWING INGREDIENTS:

21 1. POTASSIUM BROMATE.

22 2. PROPYLPARABEN.

23 3. TITANIUM DIOXIDE.

24 4. BROMINATED VEGETABLE OIL.

25 5. YELLOW DYE 5.

26 6. YELLOW DYE 6.

27 7. BLUE DYE 1.

28 8. BLUE DYE 2.

29 9. GREEN DYE 3.

30 10. RED DYE 3.

31 11. RED DYE 40.

32 Sec. 2. Legislative findings

33 The legislature finds that:

34 1. Childhood obesity, morbidity and wellness are matters of

35 statewide concern.

36 2. Ultraprocessed, industrially manufactured, nutrient-depleted

37 food with synthetic additives is undernourishing minors at public schools

38 and contributing to childhood obesity.

39 3. Any taxpayer-funded meal or snack program offered to minors at

40 public schools in this state should be nutritious and made primarily of

41 whole, minimally processed plant or animal products.

42 Sec. 3. Short title

43 This act may be cited as the "Arizona Healthy Schools Act".

APPROVED BY THE GOVERNOR APRIL 14, 2025.

FILED IN THE OFFICE OF THE SECRETARY OF STATE APRIL 14, 2025.

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