



HNS # 05-2026

Original Signed

MEMORANDUM

To: Public School Administrators, Public Charter School Administrators, School Food Authorities

From: Melissa Conner, Senior Deputy Associate Superintendent
Arizona Department of Education, Health and Nutrition Services Division

Date: May 4, 2026

Subject: Guidance on Compliance with the Arizona Healthy Schools Act for Child Nutrition Program Participating Public Districts and Charter Schools

The Arizona Healthy Schools Act and Title 15, Chapter 2, Article 2, Arizona Revised Statutes (A.R.S.), was amended to add Section 15-242.01. Under A.R.S. §15-242.01, any public school that participates in a federally funded or assisted meal program is prohibited from serving, selling, or allowing a third party to sell ultraprocessed food on the school campus during the regular school day. The requirement becomes effective at the start of School Year 2026-27. For the purposes of this section, "ultraprocessed food" means a food or beverage that contains one or more of the following ingredients:

1. Potassium bromate.
2. Propylparaben.
3. Titanium dioxide.
4. Brominated vegetable oil.
5. Yellow dye 5.
6. Yellow dye 6.
7. Blue dye 1.
8. Blue dye 2.
9. Green dye 3.
10. Red dye 3.
11. Red dye.

Local Education Agency-Wide Compliance Expectations

Compliance with A.R.S. §15-242.01 is a Local Education Agency (LEA) responsibility and must be implemented systemwide, not solely within school meal programs. School administrators are responsible for ensuring that all food access points across campuses comply with the statute.

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This includes, but is not limited to:

- School meal programs and à la carte offerings
- Vending machines
- School stores
- Fundraisers
- Classroom-based food distribution
- Contracts or agreements with third-party vendors operating on campus during the regular school day

School administrators are required to ensure that all products served or sold on campus are reviewed for compliance and to direct the removal of items containing one or more ingredients prohibited by the statute. This may require coordinated efforts among:

- School nutrition programs
- Procurement and contracting staff
- Site administration
- Student activities and athletics
- Community partners and vendors

LEA policies, procedures, contracts, and site-level practices must be reviewed and, where necessary, revised to align with statutory requirements.

Certification of Compliance with A.R.S. §15-242.01 and Public Posting

- Who Must Submit: All public districts and charter schools participating in National School Lunch Program, School Breakfast Program, Child and Adult Care Food Program and Summer Food Service Program
- How to Submit: [*Certification of Compliance for A.R.S. 15-242.01: Ultraprocessed Foods Prohibition*](#)

Additionally, the Arizona Department of Education (ADE) is required to collect and publish a list of public schools that have certified compliance with the requirements of A.R.S. §15-242.01. The list will be published on July 1, 2026, on the ADE public website. ADE will maintain and update the list as certification forms are received. Failure to submit the compliance certification will result in the LEA not being listed as compliant on the ADE public website.

ADE offers Online Training: [*What Schools Need to Know About the Arizona Healthy Schools Act*](#) to assist LEAs with understanding how to comply with A.R.S. 15-242.01.

If you have questions or concerns regarding this memo, please contact your assigned Health and Nutrition Services Specialist or submit a request for service through HelpDesk by using the link: <https://helpdeskexternal.azed.gov/> .

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1. **Mail:** U.S. Department of Agriculture, Office of the Assistant Secretary for Civil Rights, 1400 Independence Avenue, SW, Mail Stop 9410, Washington, D.C. 20250-9410;
2. **Fax:** (202) 690-7442; or
3. **Email:** program.intake@usda.gov.

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