



Stage 1 Business Analysis

California Department of Technology, SIMM 19A.3 (Ver. 3.0.9, 02/01/2022)

1.1 General Information

1. Agency or State Entity Name: 4265 - Public Health, Department of

If Agency/State entity is not in the list, enter here with the [organization code](#).

[Click or tap here to enter text.](#)

2. Proposal Name and Acronym: Assembly Bill (AB) 1264 Pupil Nutrition – Ultraprocessed Food

3. Proposal Description: (Provide a brief description of your proposal in 500 characters or less.)

The California Department of Public Health (CDPH) proposes implementing a new system allowing food vendors to report detailed information about food products sold to schools annually, including quantities, nutritional facts, and whether the products qualify as ultraprocessed by June 1, 2028. This effort will comply with Assembly Bill 1264, to promote healthier eating environments in California schools by reducing students' exposure to potentially harmful processed foods.

4. Project Planning Start Date: 9/10/2025

5. Proposed Project Execution Start Date: 1/1/2028

6. S1BA Version Number: Version 1

1.2 Submittal Information

1. Contact Information

Contact Name: [Tracy Langlands](#)

Contact Email: tracy.langlands@cdph.ca.gov

Contact Phone: [916-716-2704](tel:916-716-2704)

2. Submission Type: New Submission

If Withdraw, select Reason: [Choose an item.](#)

If Other, specify reason here: [Click or tap here to enter text.](#)

Sections Changed, if this is a Submission Update: (List all sections changed.)

N/A

Summary of Changes: (Summarize updates made.)

N/A

3. Attach [Project Approval Executive Transmittal](#) to your email submission.
4. Attach [Stage 1 Project Reportability Assessment](#) to your email submission.

1.3 Business Sponsorship

1. Executive Champion (Sponsor)

Title: Deputy Director

Name: [Ayanna Kiburi](#)

Business Program Area: [Center for Healthy Communities](#)

2. Business Owner

Title: [Health Program Manager II](#)

Name: [Jessie Gouck](#)

Business Program Area: [Nutrition and Physical Activity Branch](#)

3. Product Owner

Title: [Research Scientist IV](#)

Name: [John Pugliese](#)

Business Program Area: [Nutrition and Physical Activity Branch](#)

TIP: Copy and paste or click the + button in the lower right corner on any section to add additional Executive Champions, Business Owners, or Product Owners with their related Business Program Areas as needed.

1.4 Stakeholder Assessment

The Stakeholder Assessment is designed to give the project team an overview of communication channels that the state entity needs to manage throughout the project. More stakeholders may result in increased complexity to a project.

1. Indicate which of the following are interested in this proposal and/or the outcome of the project. (Select 'Yes' or 'No' for each.)

State Entity Only: No

Other Departments/State Entities: Yes

Public: Yes

Federal Entities: No

Governor's Office: Yes

Legislature: Yes

Media: No

Local Entities: Yes

Special Interest Groups: No

Other: Yes

2. Describe how each group marked 'Yes' will be involved in the planning process.

State Entity

The Nutrition and Physical Activity Branch within California Department of Public Health (CDPH) will be involved in planning and will be impacted by implementing the requirements of AB 1264.

Information Technology Services Division (ITSD) will be involved by supporting the department's mission to leverage the latest technology to ensure that CDPH delivers high quality public services efficiently and effectively. ITSD will develop and maintain databases, implement data integration solutions, and provide analytical support for public health research and decision-making.

Future of Public Health (FoPH) is a major modernization program containing nine initiatives. Initiative two focuses on licensing and surveillance. The initiatives seek to advance capabilities that form the basis of public health information. FoPH will not be involved in the planning process but may be interested in the outcome of the project.

Other Departments/State Entities

CalHHS Agency will be involved by reviewing planning efforts and related artifacts and will work with the department and with the California Department of Technology to align planning requirements with project risk. Additionally, to the extent that the work being proposed represents a Strategic capability for CalHHS, CalHHS will engage in the planning process to understand the technical approaches that might be leveraged or enhanced by other CalHHS efforts.

California Department of Education (CDE) is required to consult with CDPH on the submission of required reports. CDPH may confer with CDE on the content/questions to be included in the data collection system.

CDE, the California Department of Food and Agriculture, the Office of Environmental Health and Hazard Assessment, the University of California, and others are required to consult with

CDPH on regulations to define Ultraprocessed Food (UPF) of concern and restricted school foods which will impact the development of the data system.

Public

The public will not be involved in the planning process; however, they may be interested in and affected by the outcome of this project.

Governor's Office

The Governor released Executive Order N-1-25 directing CDPH to make recommendations to reduce health harm related to consumption of ultraprocessed foods. The Governor's Office is likely to be interested in the outcome of the project.

State Legislature

The legislature will not be involved in the planning process; however, they are interested in and affected by the outcome of this project. CDPH must report to the Legislature the data collected pursuant to AB 1264 and the method used to collect that data.

Local Entities

Local Entities (i.e., schools) will not be involved in the planning process; however, they may be interested in and affected by the outcome of this project.

Other Interested Parties

School food vendors will not be involved in the planning process; however, they may be interested in and affected by the outcome of this project.

Future of Public Health (FoPH) is a major modernization program containing nine initiatives. Initiative two focuses on licensing and surveillance. The initiatives seek to advance capabilities that form the basis of public health information. FoPH will not be involved in the planning process; however they may be interested in the outcome of the project.

1.5 Business Program

- 1. Business Program Name:** Nutrition and Physical Activity Branch
- 2. Program Background and Context:** Provide a brief overview of the entity's business program(s) current operations.

The CDPH's mission is to advance the health and well-being of California's diverse people and communities and work to protect the public's health. CDPH strategic goals include improving the quality of health outcomes, reducing health disparities, and utilizing data to drive better decisions and results. CDPH serves as a fundamental pillar of public health in the state, committed to protecting and improving the health of all Californians. Established with a vision to create a healthier California, the CDPH addresses a range of health issues, databases, research and decisions through comprehensive departments, community support programs, surveillance

activities and databases, and initiatives. CDPH's **Nutrition and Physical Activity Branch (NPAB)** currently funds local and state level healthy eating interventions. NPAB researches and has recommended interventions to address ultraprocessed food and beverage consumption, works with schools and other institutional settings on strengthening nutrition standards, and provides training and technical assistance to schools to support healthy eating behaviors and environments. CDPH has the expertise to support the regulatory process required to create the definitions for UPF of concern and restricted school foods.

The **Information Technology Services Division (ITSD)** plays a critical role in supporting the department's mission to protect and improve the health of all Californians. By leveraging the latest technology, ITSD ensures that CDPH can deliver high-quality public health services efficiently and effectively. ITSD's core services include but are not limited to: network and infrastructure management, cybersecurity, application development and support, data management and analytics. Data is at the heart of public health, and ITSD provides the tools and expertise needed to collect, manage, and analyze large volumes of data. This includes developing and maintaining databases, implementing data integration solutions, and providing analytical support for public health research and decision-making.

AB 1264 requires CDPH to adopt regulation on or before June 1, 2028 to restrict ultraprocessed foods from school foods. This bill, on or before February 1, 2028, and on or before February 1 of each year thereafter through February 1, 2032, would require a vendor to report specified information to the office State Department of Public Health for each food product sold to a school in the past calendar year, including, among others, the total quantity of food product sold to schools and whether that food product is an ultraprocessed food or particularly harmful ultraprocessed food, a restricted school food, or an ultraprocessed food of concern.

AB 1264, on or before July 1, 2028, and on or before July 1 of each year thereafter through July 1, 2032, would require the office, department, in consultation with the State Department of Education, to submit to the Legislature and the Governor a report that contains, among other things, a summary and analysis of the information reported to the office State Department of Public Health by vendors and recommendations for state and local legislative actions that could reduce the consumption of ultraprocessed foods and particularly harmful ultraprocessed foods, restricted school foods, and ultraprocessed foods of concern in schools.

AB 1264 would require the department to consult with the State Department of Education regarding compliance training and technical assistance for school food service and procurement staff for these purposes and would require the State Department of Public Health to establish a structure to deliver training and technical assistance to local educational agencies.

Beginning July 1, 2035, AB 1264 would prohibit a school district, county superintendent of schools, or charter school maintaining kindergarten or any of grades 1 to 12, inclusive, from offering a nutritionally adequate breakfast or lunch that includes, restricted school foods or ultraprocessed foods of concern, as provided, and would prohibit a school operated and maintained by a school district or county office of education from selling food or beverages, except for food items sold as part of a school fundraising event, containing those restricted school foods or ultraprocessed foods of concern.

3. How will this proposed project impact the product or services supported by the state entity?

Assembly Bill (AB) 1264 defines ultraprocessed food (UPF), requires California Department of Public Health (CDPH) to adopt regulations to define “UPF of concern” and “restricted school foods”, and requires California schools to begin phasing out UPF of concern and restricted school foods by July 1, 2029. The bill requires CDPH to manage a regulatory process to initially define and continuously update the definitions for UPF of concern and restricted school foods. CDPH is also required to receive data from food vendors disclosing information about their products sold to schools and requires CDPH to submit annual reports on progress of the bill’s provisions.

AB 1264 requires CDPH to adopt regulations to define subsets of food: “Ultraprocessed Foods (UPF) of Concern” and “Restricted School Foods.” The purpose of defining these subsets of food is to regulate what foods can be served and sold in California school settings. Beginning July 1, 2029, schools must begin phasing out the service or sale of UPF of concern and restricted school foods, and by July 1, 2032 school food vendors can no longer make UPF of concern or restricted school foods available for sale to schools.

To comply with AB 1264’s requirements, CDPH must develop the following processes and procedures:

A regulatory framework and processes that include all required stakeholder engagement and evidence gathering. This process will include written communications and meeting facilitation as well as research and regulation writing.

A data system to collect information from school vendors about what foods are offered and sold to schools. The data system will require the ability to link with existing external food databases and requirements to make determinations about the classifications of foods based on the vendor submission. CDPH staff will develop processes and procedures to clean and interpret the data for use in required reporting. In addition to the development of the system, CDPH will need to determine the list of possible school food vendors and create a communication and training plan to support compliance with reporting requirements.

Develop a communication and training plan to support local school food professionals to understand the new law and support procurement practices (local food purchasing and sourcing).

Submit annual reports on the progress of the provisions of the bill based on the analysis and evaluation of data submitted through the new vendor reporting system. CDPH will also use the data system to inform the required regulatory updates to the definitions of UPF of concern and restricted school foods.

An organizational change management process will be engaged to account for newly funded and hired staff and will lead to a modified organizational chart for the Branch.

The project will position CDPH to better serve the people, specifically the youth, of California by providing access to the aggregated data that can be used for demographic analysis, fulfilling reporting requirements, and guiding policy or funding decisions that contribute to improving equity, diversity, and inclusivity and the health and human safety of California youth.

1.6 Project Justification

1. Strategic Business Alignment

Enterprise Architect

Title: Senior Enterprise Architect

Name: Craig Stone

Strategic Plan Last Updated? 5/31/2019

Strategic Business Goal: Better Services to the People of California; Improved Health and/or Human Safety

Alignment: The project value aligns with the CDPH's state mission, vision, objectives, and goals. Areas of CDPH's alignment with the bill include working with schools and other institutional settings on strengthening nutrition standards and providing training and technical assistance to schools to support healthy eating behaviors and environments. CDPH has the expertise to support the regulatory process required to create the definitions for UPF of concern and restricted school foods. CDPH was recently tasked with providing recommendations to the Governor's Office related to reducing health harms affiliated with UPFs (California Executive Order N-1-25). CDPH recommended that California adopt a legal definition for UPFs and a set of healthy eating interventions.

Mandate(s): State

Bill Number/Code, if applicable: AB 1264 - Pupil nutrition: restricted school foods and ultraprocessed foods of concern: prohibition

Add the Bill language that includes system-relevant requirements:

This bill does not mandate a new IT system to do the work, but it does require specific data to be collected, analyzed, and reported on within specified timeframes. The most feasible way to achieve compliance is through automation.

This bill, on or before February 1, 2028, and on or before February 1 of each year thereafter through February 1, 2032, would require a vendor to report the following information to the State Department of Public Health:

- (1) *The total quantity of food product(s) sold to schools.*
- (2) *The name of the food product.*
- (3) *Whether the food product is an ultraprocessed food.*
- (4) *Whether the food product is a restricted school food or an ultraprocessed food of concern.*
- (5) *The category or categories of food to which the food product belongs.*
- (6) *The average total calories in each food product sold to schools that year.*
- (7) *The ingredient list of the food product.*
- (8) *The nutritional facts of the food product.*

CDPH is also required to, in consultation with the State Department of Education, submit to the Legislature and the Governor a report that contains a summary and analysis of the information

reported to the department by vendors and recommendations for state and local legislative actions that could reduce the consumption of ultraprocessed foods and particularly harmful ultraprocessed foods in schools.

The bill defines “ultraprocessed food” and ultimately prohibits schools from offering restricted school foods or ultraprocessed foods of concern, with the following implementation timeline:

- June 1, 2028: CDPH shall adopt regulations to define ultraprocessed foods of concern and restricted school foods.
- February 1, 2028: Vendors are required to begin annual reporting of specified information to CDPH for each food product sold to a school in the past calendar year.
- July 1, 2028: CDPH shall annually submit to the Legislature and the Governor a report that contains a summary and analysis of the information reported to CDPH by vendors and recommendations for state and local legislative actions that could reduce the consumption of ultraprocessed food, ultraprocessed foods of concern, and restricted school foods.
- July 1, 2029: Schools must begin to phase out restricted school foods and ultraprocessed foods of concern.
- July 1, 2032: Vendors are prohibited from offering restricted school foods and ultraprocessed foods of concern.
- July 1, 2035: Schools are prohibited from offering food or beverages that are determined to be restricted school foods or ultraprocessed foods of concern. State-mandated local programs will be implemented.

2. Business Driver(s)

Financial Benefit: No

Increased Revenue: No

Cost Savings: No

Cost Avoidance: No

Cost Recovery: No

Will the state incur a financial penalty or sanction if this proposal is not implemented? No

If the answer to the above question is “Yes,” please explain:

[Click or tap here to enter text.](#)

Improvement

Better Services to the People of California: Yes

Efficiencies to Program Operations: No

Improved Equity, Diversity, and/or Inclusivity: No

Improved Health and/or Human Safety: Yes

Improved Information Security: No

Improved Business Continuity: No

Improved Technology Recovery: No

Technology Refresh: No

Technology End of Life: No

1.7 Business Outcomes Desired

Executive Summary of the Business Problem or Opportunity:

The mission of CDPH is to advance the health and well-being of California's diverse people and communities and work to protect the public's health. CDPH strategic goals include improving the quality of health outcomes, reducing health disparities, and utilizing data to drive better decisions and results. To comply with the provisions of the bill, as outlined in proposed Health and Safety Code Section 104665(a), CDPH is required to build a data system and associated public facing portal allowing food vendors to upload sales data and associated nutritional information for each product sold to a school.

Effective February 1, 2028, AB 1264 would require vendors to begin annual reporting of specified information as outlined in the bill to CDPH for each food product sold to a school in the past calendar year.

AB 1264 also requires CDPH to consult with the State Department of Education and submit a report to the State of California Legislature and Governor by July 1, 2028, and annually thereafter. The report must include a summary of information provided by the vendors and recommendations to help reduce the use of ultraprocessed foods, especially harmful ultraprocessed foods that are sold in schools.

Objective ID: 1

Objective: Enable vendors to report on food-related data to CDPH in the timeframes outlined in AB 1264.

Metric: % of vendors submitting food-related data

Baseline: 0%, as the system does not exist yet

Target Result: Within six months of implementation, 95% of vendors will submit food-related data to CDPH for analysis.

Objective ID: 2

Objective: Within timeframes outlined in AB 1264, enable program to submit reports of food-related data to the legislature and the Governor with recommendations and actions that could reduce the consumption of ultraprocessed foods.

Metric: % of reports submitted to the legislature

Baseline: 0%, as CDPH does not currently collect the data to inform these reports

Target Result: By July 1, 2028, program will begin to provide annual reports and recommendations to the legislature and the governor.

Objective ID: 3

Objective: Enable program to identify ultraprocessed foods of concern and restricted school foods to inform legislative reports and future regulations.

Metric: Ability for CDPH program to identify and report on ultraprocessed foods.

Baseline: 0% as CDPH does not currently collect this data.

Target Result: Within 12 months of implementation, program will have the ability to identify and develop a list of ultraprocessed foods of concern and restricted foods sold to schools.

1.8 Project Management

1. Project Management Risk Score: .1

Follow the instructions in [Statewide Information Management Manual \(SIMM\) Section 45 Appendix B Project Management Risk Assessment Preparation Instructions](#).

Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix A Project Management Risk Assessment Template](#) to the email submission.

2. Project Approval Lifecycle Completion and Project Execution Capacity Assessment

Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants, or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

Answer: Yes

Does the Agency/state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

Answer (No, New, Existing, or Both): New Processes

1.9 Initial Complexity Assessment

1. Complexity Assessment (Business Score): 1.2

Follow the instructions in the [Statewide Information Management Manual \(SIMM\) Section 45 Appendix D Complexity Assessment Instructions](#).

Attach a completed [Statewide Information Management Manual \(SIMM\) Section 45 Appendix C Complexity Assessment Template](#) to the email submission.

NOTE: Business complexity is initially completed in PAL Stage 1. Technical complexity is initially completed in PAL Stage 2.

2. Noncompliance Issues: Indicate if your current operations include noncompliance issues and provide a narrative explaining how the business process is non-compliant.

Programmatic regulations: **No**

HIPAA/CIIS/FTI/PII/PCI: **No**

Security: **No**

ADA: **No**

Other: **No**

Not Applicable: **Yes**

Noncompliance Description: **N/A**

3. Additional Assessment Criteria

If there is an existing Privacy Threshold Assessment/Privacy Information Assessment, include it as an attachment to your email submission. **N/A**

How many locations and total users is the project anticipated to affect?

Number of locations: **TBD**

Estimated Number of Transactions/Business Events (per cycle): **TBD**

Approximate number of internal end-users: **10**

Approximate number of external end-users: **TBD**

1.10 Funding

Planning

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to *complete planning* through the project approval lifecycle framework? **Yes**

If Yes, when will a budget action be submitted to your Agency/DOF for planning dollars?

A Planning dollars BCP will be submitted to Budgets within 3 days after the bill is chaptered.

2. Please provide the Funding Source(s) and dates funds for planning will be made available:

General Fund

Project Implementation Funding

1. Has the funding source(s) been identified for *project implementation*? **Yes**

If known, please provide the Funding Source(s) and dates funds for implementation will be made available:

General Fund

Will a budget action be submitted to your Agency/DOF? **Yes**

If “Yes” is selected, specify when this BCP will be submitted: The BCP will be submitted within three (3) days of AB 1264 being signed.

2. Please provide a rough order of magnitude (ROM) estimate as to the total cost of the project: **Less than \$10 Million**

End of agency/state entity document.

Please ensure ADA compliance before submitting this document to CDT.

When ready, submit Stage 1 and all attachments in an email to ProjectOversight@state.ca.gov.

Department of Technology Use Only

Original "New Submission" Date: [10/22/2025](#).

Form Received Date: [10/22/2025](#).

Form Accepted Date: [10/22/2025](#).

Form Status: [Completed](#).

Form Status Date: [10/22/2025](#).

Form Disposition: [Approved](#).

If Other, specify: [Click or tap here to enter text](#).

Form Disposition Date: [10/22/2025](#).

Department of Technology Project Number (0000-000): [4265-098](#)