

Allowable Milk Substitutes for Children without Disabilities in the Child and Adult Care Food Program

Child care centers, Head Start centers, at-risk afterschool care centers, emergency shelters, and family day care homes that participate in the Child and Adult Care Food Program (CACFP) must follow the U.S. Department of Agriculture's (USDA) requirements for milk substitutes for children without disabilities. These requirements apply only to meal accommodations for children without disabilities who cannot drink milk.

CACFP facilities have the option to make this accommodation by offering one or more allowable fluid milk substitutes for children without disabilities. These substitutes are at the expense of the CACFP facility. If the CACFP facility chooses to make allowable milk substitutes available, they must be available for all children when requested by their parent or guardian.

Note: The following criteria apply only to milk substitutes for children without disabilities. Dietary accommodations for children with disabilities must follow the USDA's requirements. For more information, see the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Child Care Programs*.

Allowable Fluid Milk Substitutes

CACFP facilities can choose to offer one or more allowable fluid milk substitutes, including:

- **lactose-free or lactose-reduced milk that meets the appropriate fat content for each age group** (i.e., unflavored whole milk for age 1; unflavored low-fat (1%) milk or unflavored fat-free milk for ages 2-5; and unflavored low-fat (1%) milk, unflavored fat-free milk, or flavored fat-free milk for ages 6-12); and
- **allowable nondairy milk substitutes**, such as soy milk, that meet the USDA's nutrition standards for milk substitutes. For more information, see "USDA's nutrition standards for Milk Substitutes" on page 2.

The USDA recommends that lactose-free or lactose-reduced milk is the first choice for children with lactose intolerance.

CACFP facilities may choose to offer only one milk substitute such as lactose-free milk. If a child or family decides not to take this option, the CACFP facility is not obligated to offer any other milk substitutes. CACFP facilities may also choose (but are not required) to offer a second option of a nondairy beverage that meets the USDA's nutrition standards for milk substitutes



Juice and Water Substitutes

CACFP facilities can never offer juice or water as milk substitutes for children without disabilities, even with a medical statement signed by a recognized medical authority. If CACFP facilities chooses to make milk substitutes available, they must include either lactose-free or lactose-reduced milk that is the appropriate fat content for each age group, or a nondairy beverage that meets the USDA’s nutrition standards for milk substitutes (see table 1). These are the only two options allowed by the USDA as milk substitutes for children without disabilities in the CACFP.

Required Documentation

Milk substitutes for children without disabilities do not require a medical statement from a recognized medical authority. Parents or guardians may request a nondairy milk substitute in writing. The written request from the parent or guardian must identify the medical or other special dietary need that restricts the child’s diet and requires the substitution.

The provision allowing a written request from a parent or guardian applies only to milk substitutes for children without disabilities. It does not apply to any other substitutions of foods or beverages in CACFP meals for children without disabilities. For information on meal accommodations for children without disabilities, see the CSDE’s guide, *Accommodating Special Diets in CACFP Child Care Programs*.

USDA’s Nutrition Standards for Milk Substitutes

CACFP facilities that choose to offer a nondairy milk substitute as part of reimbursable meals for children without disabilities must use products that meet the USDA’s nutrition standards for fluid milk substitutes (see table 1). Nondairy milk substitutes that do not meet these nutrition standards cannot be served in reimbursable meals and snacks for children without disabilities, even if the child’s family provides a medical statement signed by a recognized medical authority.



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Table 1 summarizes the USDA’s nutrition standards for fluid milk substitutes.

Table 1. USDA’s nutrition standards for fluid milk substitutes	
Minimum Nutrients per Cup (8 fluid ounces)	
Calcium	276 milligrams (mg) or 30% Daily Value (DV) ¹
Protein	8 grams (g)
Vitamin A	500 international units (IU) or 10% DV
Vitamin D	100 IU or 25% DV
Magnesium	24 mg or 6% DV
Phosphorus	222 mg or 20% DV ¹
Potassium	349 mg or 10% DV ¹
Riboflavin	0.44 mg or 25% DV ¹
Vitamin B-12	1.1 micrograms (mcg) or 20% DV ¹
¹ The FDA labeling laws require manufacturers to round nutrition values to the nearest five percent. The actual minimum DV is 27.6% for calcium, 22.2% for phosphorus, 9.97% for potassium, 25.88% for riboflavin, and 18.33% for vitamin B12.	

Nondairy milk substitutes must be unflavored for ages 1-5. Flavored nondairy milk substitutes may be served to ages 6 and older, but the USDA’s *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.

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Acceptable Milk Substitute Products

Certain brands of soy milk are the only currently available nondairy milk products that meet the USDA’s nutrition standards for fluid milk substitutes. Table 2 provides a list of allowable milk substitute products. Nondairy milk substitutes must be unflavored for ages 1-5. This list is for informational purposes and does not imply endorsement by the CSDE or the USDA.

Table 2. Milk substitutes meeting the USDA’s nutrition standards			
Allowable for ages 1 and older			
Manufacturer	Product	Container Size (Fluid Ounces)	Container UPC Code
Kikkoman	Pearl Organic Soymilk, Smart Original, aseptic package	8.25	0-41390-06137-0
Kirkland Signature	Organic Soymilk, Plain	64	0-96619-49000-4
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	8	0-52603-08311-9
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	32	0-52603-08200-6
Stremick’s Heritage Foods	8th Continent Soymilk, Original, refrigerated	64	0-53859-07066-3
Sunrich Naturals	Soymilk, Original, aseptic package ¹	8	7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package ¹	32	7-82758-33232-8
Walmart	Great Value Soymilk, Original, paper carton ¹	32	0-78742-09387-1
Allowable only for ages 6 and older ²			
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8.25	0-41390-06151-6
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8.25	0-41390-06141-7
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Vanilla, aseptic package	32	0-52603-08225-9
Stremick’s Heritage Foods	8th Continent Soymilk, Vanilla, refrigerated	64	0-53859-07067-0
Sunrich Naturals	Soymilk, Unsweetened Vanilla, aseptic package ¹	32	7-82758-33932-7
Sunrich Naturals	Soymilk, Vanilla, aseptic package	32	7-82758-33132-1
Sunrich Naturals	Soymilk, Vanilla, aseptic package	8	7-82758-33208-3
<p>¹ These beverages cannot be served in child care programs in public schools because they exceed the fat limit for nondairy beverages specified by Section 10-221q of the Connecticut General Statutes.</p> <p>² Flavored nondairy milk substitutes may be served to ages 6 and older, but the USDA’s <i>CACFP Best Practices</i> recommends serving only unflavored milk substitutes.</p>			

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For milk substitutes not listed, CACFP facilities must obtain nutrition information from the manufacturer to document that a product contains the required amount of each nutrient in the USDA's nutrition standards for milk substitutes (see table 1). The Nutrition Facts label might not include all of the nutrients required to identify a product's compliance with the USDA nutrition standards. For assistance with evaluating products for compliance, please contact the CSDE.

Resources

Accommodating Special Diets in CACFP Child Care Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/NPGspdiet.pdf>

CACFP Best Practices (USDA):

https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_factBP.pdf

CACFP Meal Patterns for Children (USDA):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/CACFPmealpattern.pdf>

Final Rule: Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (81 FR 24348):

<https://www.gpo.gov/fdsys/pkg/FR-2016-04-25/pdf/2016-09412.pdf>

Serving Milk in the CACFP (USDA):

<https://fns-prod.azureedge.net/sites/default/files/tn/cacfp-servingmilk.pdf>

USDA Memo CACFP 17-2016: Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the CACFP, Q&As:

<https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-and-fluid-milk-substitutions-cacfp-qas>

Allowable Milk Substitutes for Children without Disabilities in the CACFP



For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This handout is available at <https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/CACFPmilksub.pdf>.

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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