

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

The requirements in this document apply only to adult day care centers that participate in the Child and Adult Care Food Program (CACFP), and offer milk substitutes for adult participants whose dietary needs do not constitute a disability. Meal modifications for adult participants whose disability restricts their diet must follow the federal nondiscrimination laws and regulations. For more information, review the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*, and visit the CSDE's [Special Diets in CACFP Adult Day Care Centers](#) webpage.



Adult day care centers that participate in the CACFP must follow the U.S. Department of Agriculture's (USDA) requirements for milk substitutes for adult participants without disabilities. These requirements apply only to meal modifications for adult participants without disabilities who cannot drink milk.

CACFP adult day care centers have the option to make this accommodation by offering one or more allowable fluid milk substitutes for adult participants without disabilities. If the CACFP adult day care center chooses to make allowable milk substitutes available, they must be available for all adult participants when requested by the adult participant or guardian/caregiver. The USDA does not provide additional reimbursement for these substitutions.

## Allowable Fluid Milk Substitutes

CACFP adult day care centers may choose to offer one or more allowable milk substitutes for adult participants whose dietary needs do not constitute a disability. The two types of allowable substitutes include:

- lactose-reduced or lactose-free milk (unflavored low-fat (1%) and unflavored or flavored fat-free); and
- nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes, such as certain brands of soy milk.

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

CACFP adult day care centers may choose to offer only one milk substitute, such as lactose-free low-fat unflavored milk. If adult participants decide not to take this option, the CACFP adult day care center is not obligated to offer any



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other milk substitutes. CACFP adult day care centers 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.

### USDA's Nutrition Standards for Milk Substitutes

CACFP adult day care centers that choose to offer a nondairy milk substitute for adult participants without disabilities must use products that meet the USDA's nutrition standards for fluid milk substitutes. Table 1 lists these standards. CACFP adult day care centers may serve flavored nondairy milk substitutes, but the USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.

For adult participants without disabilities, reimbursable CACFP meals and snacks cannot contain nondairy beverages that do not comply with the USDA's nutrition standards for fluid milk substitutes, even with a medical statement signed by a recognized medical authority. A noncompliant nondairy beverage cannot replace milk unless the adult participant's medically documented disability specifically requires it.

| 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) <sup>1</sup> |
| 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 <sup>1</sup>                            |
| Potassium   | 349 mg or 10% DV <sup>1</sup>                            |
| Riboflavin  | 0.44 mg or 25% DV <sup>1</sup>                           |
| Vitamin B-12  | 1.1 micrograms (mcg) or 20% DV <sup>1</sup>              |
| <sup>1</sup> The Food and Drug Administration (FDA) labeling laws require manufacturers to round nutrition values to the nearest 5 percent. The unrounded 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. Source: <a href="#">How to Determine if a Soy-Based Beverage Meets the Nutrient Requirements to Qualify as an Authorized Milk Substitute in WIC</a> , USDA Food and Nutrition Services (FNS) Office of Research, Nutrition, and Analysis (ORNA), 2006. |  |

### Identifying acceptable nondairy beverages

The Nutrition Facts label does not usually include all of the nutrients required to identify a product's compliance with the USDA's nutrition standards for fluid milk substitutes. If the Nutrition Facts label is missing any of the required nutrient information, CACFP adult day care centers must contact the manufacturer to obtain a product specification sheet that documents the product's compliance with each of the nine nutrients (see [table 1](#)).

CACFP adult day care centers can use the USDA's protein standard to screen nondairy products and determine if they might meet the USDA's nutrition standards. The USDA requires that fluid milk substitutes contain 8 grams of protein per cup (8 fluid ounces). If the product's Nutrition Facts label lists less than 8 grams of protein per 1-cup serving, the product does not meet the USDA's nutrition standards.

If the product's Nutrition Facts label lists at least 8 grams of protein per 1-cup serving, the product might comply with the USDA's nutrition standards. CACFP adult day care centers must obtain additional information from the manufacturer to determine if the product also meets the standards for calcium, vitamin A, vitamin D, magnesium, phosphorus, potassium, riboflavin, and vitamin B12. CACFP adult day care centers are encouraged to submit this information to the CSDE so that new acceptable products can be identified. [Table 2](#) lists currently approved products.

### Required Documentation

Milk substitutions for adult participants without disabilities do not require a medical statement from a recognized medical authority. The adult participant or guardian/caregiver may request a nondairy milk substitute in writing. The written request must identify the medical or other special dietary need that restricts the adult participant's diet and requires the substitution. Requests for milk substitutes must be maintained on file with the adult participant's medical records.

The provision allowing a written request applies only to milk substitutions for adult participants without disabilities. It does not apply to any other substitutions of foods or beverages in CACFP meals and snacks for adult participants without disabilities. For information on meal modifications for adult participants without disabilities, review section 3 of the CSDE's guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*.

## Other Beverages

If a participant's dietary restriction is not related to a disability, CACFP adult day care centers cannot substitute any other beverages for milk, even with a medical statement signed by a recognized medical authority. Examples of beverages that cannot be substituted for milk include:

- juice;
- water;
- milk substitutes that do not comply with the USDA's nutrition standards for fluid milk substitutes, such as almond milk, rice milk, and cashew milk;
- nutrition supplement beverages, such as Abbott's Ensure and Nestle's Boost;
- powdered milk beverages.
- soda (regular and diet); and
- coffee and tea.



CACFP meals and snacks for adult participants without disabilities are not reimbursable if they contain any of these beverages in place of milk. If the CACFP adult day care center chooses to make milk substitutes available, they must include at least one choice of either lactose-reduced or lactose-free milk (unflavored low-fat (1%), unflavored fat-free, or flavored fat-free), or an allowable nondairy beverage that meets the USDA's nutrition standards for milk substitutes. These are the only two options allowed for milk substitutes for adult participants without disabilities.

## Acceptable Milk Substitute Products

Certain brands of soy milk are the only nondairy milk products that meet the USDA's nutrition standards for fluid milk substitutes. Almond milk, rice milk, and other nondairy milk products do not currently meet these standards.

[Table 2](#) provides a list of allowable milk substitute products. This list is for informational purposes and does not imply endorsement by the CSDE or the USDA.

For milk substitutes not listed, CACFP adult day care centers must obtain nutrition information from the manufacturer to document that the product contains the required amount of each nutrient in the USDA's nutrition standards for milk substitutes. 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.

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| Table 2. Milk substitutes meeting the USDA's nutrition standards |   |                                  |   |
|--|---|----------------------------------|---|
| Unflavored milk substitutes                                      |   |                                  |   |
| Manufacturer   | Product   | Container size<br>(fluid ounces) | Container<br>UPC code   |
| Kikkoman   | Pearl Organic Soymilk,<br>Smart Original, aseptic<br>package          | 8                                | Code 06183; UPC<br>0-41390-06183-7;<br>Case (24 count)<br>UPC 100-41390-<br>06183-4 |
| Kirkland Signature   | Organic Soymilk, Plain  | 64                               | 0-96619-49000-4   |
| Pacific Natural Foods  | Ultra Soy All Natural<br>Nondairy Beverage,<br>Plain, aseptic package | 8                                | 0-52603-08311-9   |
| Pacific Natural Foods  | Ultra Soy All Natural<br>Nondairy Beverage,<br>Plain, aseptic package | 32                               | 0-52603-08200-6   |
| Stremick's Heritage<br>Foods                                     | 8th Continent Soymilk,<br>Original, refrigerated                      | 64                               | 0-53859-07066-3   |
| Sunrich Naturals   | Soymilk, Original,<br>aseptic package                                 | 8                                | 7-82758-33108-6   |
| Sunrich Naturals   | Soymilk, Original,<br>aseptic package                                 | 32                               | 7-82758-33232-8   |
| Walmart  | Great Value Soymilk,<br>Original, paper carton                        | 32                               | 0-78742-09387-1   |

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**Table 2. Milk substitutes meeting the USDA’s nutrition standards, *continued***

| Flavored milk substitutes <sup>1</sup> |   |                                  |   |
|--|---|----------------------------------|---|
| Manufacturer                           | Product   | Container size<br>(fluid ounces) | Container<br>UPC code   |
| Kikkoman                               | Pearl Organic Soymilk,<br>Smart Chocolate, aseptic<br>package           | 8                                | Code 06185; UPC<br>0-41390-06185-1;<br>Case (24 count)<br>UPC 100-41390-<br>06185-8 |
| Kikkoman                               | Pearl Organic Soymilk,<br>Smart Creamy Vanilla,<br>aseptic package      | 8                                | Code 06184; UPC<br>0-41390-06184-4;<br>Case (24 count)<br>UPC 100-41390-<br>06184-1 |
| Pacific Natural Foods                  | Ultra Soy All Natural<br>Nondairy Beverage,<br>Vanilla, aseptic package | 32                               | 0-52603-08225-9   |
| Stremick’s Heritage<br>Foods           | 8th Continent Soymilk,<br>Vanilla, refrigerated                         | 64                               | 0-53859-07067-0   |
| Sunrich Naturals                       | Soymilk, Unsweetened<br>Vanilla, aseptic package <sup>1</sup>           | 32                               | 7-82758-33932-7   |
| Sunrich Naturals                       | Soymilk, Vanilla, aseptic<br>package                                    | 32                               | 7-82758-33132-1   |
| Sunrich Naturals                       | Soymilk, Vanilla, aseptic<br>package                                    | 8                                | 7-82758-33208-3   |

<sup>1</sup> CACFP adult day care centers may serve flavored nondairy milk substitutes to adult participants, but the USDA’s *CACFP Best Practices* recommends serving only unflavored milk substitutes.

## Resources

Accommodating Special Diets in CACFP Adult Day Care Centers (CSDE):

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

CACFP Adult Meal Patterns:

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

CACFP Best Practices (USDA):

[https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP\\_factBP.pdf](https://fns-prod.azureedge.net/sites/default/files/cacfp/CACFP_factBP.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>

Milk Substitutes in CACFP Adult Day Care Centers (Documents/Forms section of CSDE's Special Diets in CACFP Adult Day Care Centers webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers/Documents#MilkSubstitutes>

Requirements for Meal Modifications in CACFP Adult Day Care Centers (CSDE Presentation):

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

Resource List for Special Diets in Child Nutrition Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/Resources/ResourcesSpecialDiets.pdf>

Serving Milk in the CACFP (USDA):

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

Special Diets in CACFP Adult Day Care Centers (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers>

Summary of Requirements for Accommodating Special Diets for Adult Participants in the CACFP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/ChartSpecialDietsCACFPAdults.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 Adult Participants without Disabilities in the CACFP



For more information, visit the CSDE's [Special Diets in CACFP Adult Day Care Centers](#) 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/MilkSubstitutesCACFPAdults.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](mailto:program.intake@usda.gov).

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