

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

This guidance applies to meals and snacks served in adult day care centers that participate in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP). For more information on meal modifications in the CACFP, refer to the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*.



Adult day care centers that participate in the CACFP must follow the USDA's requirements for milk substitutes for adult participants without a disability. These requirements apply only to meal modifications for adult participants *without* a disability who cannot drink milk. Meal modifications for adult participants with a disability that restricts their diet must comply with the federal nondiscrimination laws and regulations.

Adult day care centers have the option to make this accommodation by offering one or more allowable fluid milk substitutes for adult participants without a disability. If the 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

The USDA allows only two types of milk substitutes for adult participants whose dietary needs do not constitute a disability.

1. **Lactose-free or lactose-reduced milk** that is unflavored low-fat (1%), unflavored fat-free milk, or flavored fat free. The USDA recommends that lactose-free or lactose-reduced milk is the first choice for adult participants with lactose intolerance. **Note:** The USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.
2. **Nondairy milk substitutes** that meet the USDA's nutrition standards for fluid milk substitutes (refer to table 1), such as certain brands of soy milk.



Adult day care centers may choose to offer only one milk substitute. If an adult participant decides not to take this option, the adult day care center is not obligated to offer any other milk substitutes.

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USDA’s Nutrition Standards for Milk Substitutes

Adult day care centers that choose to offer a nondairy milk substitute for adult participants without a disability must use products that meet the USDA’s nutrition standards for fluid milk substitutes (refer to table 1). 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 a disability, 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 has a medically documented disability that specifically requires this substitution.

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 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: <i>How to Determine if a Soy-Based Beverage Meets the Nutrient Requirements to Qualify as an Authorized Milk Substitute in WIC</i> , USDA Food and Nutrition Services (FNS) Office of Research, Nutrition, and Analysis (ORNA), 2006.	

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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, 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 (refer to [table 1](#)).

Adult day care centers may 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 must 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* meet the USDA's nutrition standards. 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. Adult day care centers are encouraged to submit this information to the CSDE so that new acceptable products can be added to the list of approved products (refer to [table 2](#)).

Required Documentation

Nondairy milk substitutes for adult participants without a disability 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 nondairy milk substitutes for adult participants without a disability. It does not apply to any other substitutions of foods or beverages in CACFP meals and snacks for adult participants without a disability. For information on meal modifications for adult participants without a disability, refer to section 3 of the CSDE's guide, *Accommodating Special Diets in CACFP Adult Day Care Centers*.

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Other Beverages

If a participant's dietary restriction is not related to a disability, 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, oat 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 a disability are not reimbursable if they contain any of these beverages in place of milk. If the 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 a disability.

Acceptable Milk Substitute Products

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

Not all brands of soy milk meet the USDA's requirements. Before purchasing any type of soy milk, adult day care centers should review products to make sure they comply with the USDA's requirements.

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, adult day care centers must obtain nutrition information from the manufacturer to

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document that the product contains the required amount of each nutrient in the USDA’s nutrition standards for milk substitutes (refer to [table 1](#)). The Nutrition Facts label might not include all 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.

Table 2. Milk substitutes meeting the USDA’s nutrition standards			
Unflavored milk substitutes			
Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Original, aseptic package	8	Code 06183; UPC 0-41390-06183-7; Case (24 count) UPC 100-41390- 06183-4
Kirkland Signature	Organic Soymilk, Plain	64	0-96619-49000-4
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	32	0-52603-08200-6; Case (12 count) 100-52603-08200-6
Stremick’s Heritage Foods	8th Continent Soymilk, Original, refrigerated	64	0-53859-07066-3
Sunrich Naturals	Soymilk, Original, aseptic package	8	7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package	32	7-82758-33232-8
Walmart	Great Value Soymilk, 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 ¹			
Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8	Code 06185; UPC 0-41390-06185-1; Case (24 count) UPC 100-41390- 06185-8
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8	Code 06184; UPC 0-41390-06184-4; Case (24 count) UPC 100-41390- 06184-1
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 Flavored nondairy milk substitutes are allowed but the USDA’s <i>CACFP Best Practices</i> recommends serving only unflavored milk substitutes.</p>			

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Resources

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

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Special_Diets_CACFP_Adults.pdf

CACFP Meal Patterns for Adults (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/Adult_Meal_Pattern_CACFP.pdf

CACFP Best Practices (USDA):

https://fns-prod.azureedge.us/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/Meal_Modifications_CACFP_Adults_Presentation.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/Summary_Chart_Special_Diets_CACFP_Adults.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>

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For more information, visit the CSDE's [Special Diets in CACFP Adult Day Care Centers](#) webpage or contact the [CACFP staff](#) at the Connecticut State Department of Education, School Health, Nutrition and Family Services, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841

This document is available at https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP_Adults.pdf.

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1. **mail:** U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or
2. **fax:** (833) 256-1665 or (202) 690-7442; or
3. **email:** program.intake@usda.gov

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