

## Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP

This document indicates how to determine if nondairy beverages for participants without a disability credit as milk substitutes in the U.S. Department of Agriculture's (USDA) meal patterns for the Child and Adult Care Food Program (CACFP). This guidance applies to CACFP child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers.



To credit in the CACFP meal patterns, nondairy milk substitutes for participants without a disability must meet the USDA's nutrition standards for fluid milk substitutes ([7 CFR 226.20\(g\)\(3\)](#)). Nondairy beverages that do not meet these requirements cannot be served in reimbursable meals and snacks unless the participant has a medically documented disability that specifically requires this substitution.

**Instructions:** Use the chart on page 2 to enter the product's information in column 3, then complete column 4 to determine if the nondairy milk substitute complies with each standard.

- **Column 1** indicates the minimum nutrients per cup (8 fluid ounces) for the nine required nutrients of the USDA's nutrition standards for fluid milk substitutes.
- **Column 2** indicates the unrounded and rounded percent Daily Value (% DV) for each nutrient. The unrounded % DV is the current daily value for each nutrient indicated in the Food and Drug Administration's (FDA) [Reference Guide: Daily Values for Nutrients](#). The rounded % DV is based on the FDA labeling laws (refer to Appendix H of the FDA's [A Food Labeling Guide: Guidance for Industry](#)). It is listed on the Nutrition Facts label and indicates how each nutrient in the serving contributes to a daily diet of 2,000 calories.
- **Column 3:** Enter the nutrients per cup or % DV from the Nutrition Facts label or manufacturer's nutrient analysis. **Note:** Product information might list nutrient values, % DV (unrounded or rounded), or both. If any nutrient values are missing, the CACFP facility must obtain this information from the manufacturer.
- **Column 4:** Check "yes" or "no" to indicate if the product meets each nutrient standard (either the nutrients per cup in column 1 or the unrounded or rounded % DV in column 2). If all "yes" boxes are checked, the product is an allowable nondairy milk substitute. Submit information to the CSDE so compliant products may be added to the list of allowable products.

**Additional requirements:** In addition to meeting the USDA's nutrition standards for fluid milk substitutes, nondairy milk substitutes must comply with the applicable requirements below.

- Nondairy milk substitutes must be unflavored for ages 1-5. Nondairy milk substitutes may be flavored for ages 6 and older but the USDA's [CACFP Best Practices](#) recommends serving only unflavored nondairy milk substitutes.

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- Nondairy milk substitutes in child care programs that operate in public schools must meet the state beverage requirements of [Section 10-221q](#) of the Connecticut General Statutes. They cannot contain artificial sweeteners and cannot exceed 4 grams of sugar per ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fat.

To be an allowable nondairy milk substitute, the product must meet each nutrient standard (either the nutrients per cup in column 1 or the unrounded or rounded % DV in column 2). Check that the product also meets the additional requirements indicated above.

Comparison of a nondairy milk substitute with the USDA's nutrition standards				
Column 1	Column 2		Column 3	Column 4
USDA requirements: Minimum nutrients per cup (8 fluid ounces)	Percent DV (% DV)		Product information <sup>3</sup>	Meets nutrient standard in column 1 or 2
	Unrounded <sup>1</sup>	Rounded <sup>2</sup>		
<b>Calcium:</b> 276 milligrams (mg)	21.23%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Protein:</b> 8 grams (g)	16%	16%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Vitamin A:</b> 500 international units (IU) or 150 micrograms (mcg) retinol activity equivalent (RAE) <sup>4</sup>	16.67%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Vitamin D:</b> 100 IU or 2.5 micrograms (mcg) <sup>4</sup>	12.5%	15%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Magnesium:</b> 24 mg	5.71%	6%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Phosphorus:</b> 222 mg	17.76%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Potassium:</b> 349 mg	7.43%	10%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Riboflavin:</b> 0.44 mg	33.85%	35%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<b>Vitamin B12:</b> 1.1 mcg	45.83%	45%		<input type="checkbox"/> Yes <input type="checkbox"/> No
<sup>1</sup> The unrounded % DV is USDA's minimum nutrients per cup (column 1) divided by the current daily value for each nutrient (refer to the FDA's <a href="#">Reference Guide: Daily Values for Nutrients</a> ). <sup>2</sup> The rounded % DV is based on the FDA labeling laws and listed on the Nutrition Facts label (refer to Appendix H of the FDA's <a href="#">A Food Labeling Guide: Guidance for Industry</a> ). <sup>3</sup> Indicate the product's nutrients per cup or % DV (unrounded or rounded). The manufacturer's product information might list nutrient values, % DV, or both. <sup>4</sup> The 2016 FDA final rule, <a href="#">Food Labeling: Revision of the Nutrition and Supplement Facts Labels</a> , updated the Nutrition Facts label to change IUs to mcg for vitamins A and D.				

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### Written Request Required for Nondairy Milk Substitute

Allowable nondairy milk substitutes require a written request from the parent/guardian (child care programs) and the participant or their guardian/caregiver (adult day care centers) that identifies the medical or other special dietary need that restricts the participant's diet and requires the nondairy milk substitute. Requests for nondairy milk substitutes must be maintained on file with participants' medical records. For detailed guidance on the USDA's requirements for milk substitutes, refer to the CSDE's *Allowable Milk Substitutes for Children without Disabilities in the CACFP* or *Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP*.



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## Resources

A Food Labeling Guide: Guidance for Industry (FDA):

<https://www.fda.gov/media/81606/download>

Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk\\_Substitutes\\_CACFP\\_Adults.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP_Adults.pdf)

Allowable Milk Substitutes for Children without Disabilities in the CACFP (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk\\_Substitutes\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP.pdf)

CACFP Best Practices (USDA):

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

Final Rule 81 FR 33742: Food Labeling: Revision of the Nutrition and Supplement Facts Labels:

<https://www.federalregister.gov/documents/2016/05/27/2016-11867/food-labeling-revision-of-the-nutrition-and-supplement-facts-labels>

Guide to Meal Modifications for CACFP Adult Day Care Centers (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide\\_Special\\_Diets\\_CACFP\\_Adults.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Special_Diets_CACFP_Adults.pdf)

Guide to Meal Modifications in CACFP Child Care Programs (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide\\_Special\\_Diets\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Special_Diets_CACFP.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>

Milk Substitutes in CACFP Child Care Programs (Documents/Forms section of CSDE's Special Diets in CACFP Child Care Programs webpage):

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

Reference Guide: Daily Values for Nutrients (FDA):

<https://www.fda.gov/food/nutrition-facts-label/daily-value-nutrition-and-supplement-facts-labels>

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

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

Special Diets in CACFP Child Care Programs (CSDE):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Child-Care-Programs>

## Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP

USDA CACFP Regulations 7 CFR 226.20(g)(3)) Fluid milk substitutions for non-disability reasons:

[https://www.ecfr.gov/current/title-7/part-226#p-226.20\(g\)\(3\)](https://www.ecfr.gov/current/title-7/part-226#p-226.20(g)(3))

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>

USDA Memo SP 07-2010, CACFP 04-2010, and SFSP 05-2010: Questions and Answers: Fluid Milk Substitutions:

<https://www.fns.usda.gov/cn/qas-milk-substitution-children-medical-or-special-dietary-needs>

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

This document is available at [https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Determining\\_Allowable\\_Nondairy\\_Milk\\_Substitutes\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Determining_Allowable_Nondairy_Milk_Substitutes_CACFP.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](mailto:program.intake@usda.gov)

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