

# Identifying Products that Meet USDA's Nutrition Standards for Fluid Milk Substitutes in the Child and Adult Care Food Program

This document indicates how to determine if commercial nondairy beverage products credit as fluid 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 adult day care centers, child care centers, family day care homes, emergency shelters, at-risk afterschool care centers, and adult day care centers.

This document does not apply to fluid milk substitutes for participants whose disability restricts their diet. For detailed guidance on the meal modification requirements for disability reasons, refer to the Connecticut State Department of Education's (CSDE) [Guide To Meal Modifications For Child Care Programs In The Child And Adult Care Food Program](#) or [Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program](#).

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# Identifying Products that Meet USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP

The USDA allows CACFP sponsors to offer optional fluid milk substitutes (nondairy beverages) for participants who do not consume regular cow's milk due to non-disability reasons. Fluid milk substitutes are plant-based beverages like fortified soy milk that are intended to replace cow's milk. CACFP sponsors may choose, but are not required, to offer one or more nondairy beverages to all participants.

## Allowable Fluid Milk Substitutes (Nondairy Beverages)

Nondairy milk substitutes for non-disability reasons must meet the USDA's nutrition standards for fluid milk substitutes defined in [7 CFR 210.10\(d\)\(3\)](#) of the CACFP regulations and must be fortified in accordance with the Food and Drug Administration's (FDA) fortification guidelines. Only certain brands of fluid milk substitutes meet these standards.

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. For detailed guidance on the USDA's requirements for fluid milk substitutes, refer to the CSDE's resources, [Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the Child and Adult Care Food Program](#) and [Allowable Fluid Milk Substitutes for Non-disability Reasons for Children in the Child and Adult Care Food Program](#).

## Required documentation for fluid milk substitutes

CACFP sponsors must have documentation on file to claim reimbursement for meals and snacks that contain fluid milk substitutes. Prior to providing a nondairy beverage for non-disability reasons, CACFP child care programs and adult day care centers must obtain a written request that identifies the reason for the milk substitute. This statement may be submitted by:

- the child's parent/guardian (or for adult participants, the participant or their guardian/caregiver);
- a state licensed healthcare professional, i.e., physician (MD), physician assistant (PA) and certified physician assistant (PAC), doctors of osteopath (DO), and advanced practice registered nurse (APRN); or
- a registered dietitian (RD) or registered dietitian nutritionist (RDN).

For example, a parent may submit a written request for an allowable brand of soy milk because her child is a vegetarian. CACFP child care programs and adult day care centers must maintain all requests for fluid milk substitutes on file with participants' other medical records

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## Instructions for Identifying Allowable Fluid Milk Substitutes

Use the chart on page 3 ([Comparison Chart: Meeting the USDA's Nutrition Standards](#)) to enter the product's information in column 4, then complete column 5 to determine if the fluid milk substitute complies with each standard.

- **Column 1** indicates the minimum nutrients per cup (8 fluid ounces) for the eight required nutrients of the USDA's nutrition standards for fluid milk substitutes.
- **Column 2** indicates the unrounded 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](#).
- **Column 3** indicates the rounded percent % DV for each nutrient. 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 4:** 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 sponsor must obtain this information from the manufacturer.
- **Column 5:** Check "yes" or "no" to indicate if the product meets each nutrient standard (either the nutrients per cup in column 1 or the unrounded % DV in column 2 or the rounded % DV in column 3). If all "yes" boxes are checked, the product is an allowable fluid 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, fluid milk substitutes must also comply with the applicable requirements below.

- Fluid milk substitutes for ages 1-5 must be unflavored.
- Fluid milk substitutes in child care programs that operate in public schools must meet the state beverage requirements for nondairy milk substitutes under [Section 10-221g 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, or 10 percent of calories from saturated fat.

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To be an allowable fluid milk substitute, a commercial 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 Chart: Meeting the USDA's Nutrition Standards

Column 1: USDA requirements: Minimum nutrients per cup (8 fluid ounces)	Column 2: Unrounded % DV <sup>1</sup>	Column 3: Rounded % DV <sup>2</sup>	Column 4: Product information <sup>3</sup>	Column 5: Meets nutrient standard in column 2 or 3
Calcium: 276 milligrams (mg)	21.23%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Protein: 8 grams (g)	16%	16%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Vitamin A: 150 micrograms (mcg) retinol activity equivalent (RAE)	16.67%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Vitamin D: 2.5 micrograms (mcg)	12.5%	15%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Magnesium: 24 mg	5.71%	6%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Phosphorus: 222 mg	17.76%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Potassium: 349 mg	7.43%	10%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Riboflavin: 0.44 mg	33.85%	35%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Vitamin B12: 1.1 mcg	45.83%	45%		<input type="checkbox"/> Yes <input type="checkbox"/> No

<sup>1</sup> The unrounded % DV is the minimum nutrients per cup divided by the current daily value for each nutrient (refer to the FDA's [Reference Guide: Daily Values for Nutrients](#)).

<sup>2</sup> The rounded % DV is based on the FDA labeling laws and is listed on the Nutrition Facts label (refer to Appendix H of the FDA's [A Food Labeling Guide: Guidance for Industry](#)).

<sup>3</sup> Indicate the product's nutrients per cup or % DV (either unrounded or rounded). The manufacturer's product information might list nutrient values, % DV, or both.

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## Resources

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

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

### Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the Child and Adult Care Food Program (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 Fluid Milk Substitutes for Non-disability Reasons for Children in the Child and Adult Care Food Program (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)

### FDA 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 Adult Day Care Centers in the Child and Adult Care Food Program: (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide\\_meal\\_modifications\\_cacfp\\_adults.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide_meal_modifications_cacfp_adults.pdf)

### Guide to Meal Modifications for Child Care Programs in the Child and Adult Care Food Program (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 for Non-disability Reasons (CSDE's Special Diets in the Child and Adult Care Food Program webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-the-child-and-adult-care-food-program/milk-substitutes-for-non-disability-reasons>

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

[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))

### Reference Guide: Daily Values for Nutrients (FDA):

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

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Special Diets in the Child and Adult Care Food Program (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-the-child-and-adult-care-food-program>

USDA Final Rule: Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans (89 FR 31962):

<https://www.federalregister.gov/documents/2024/04/25/2024-08098/child-nutrition-programs-meal-patterns-consistent-with-the-2020-2025-dietary-guidelines-for>

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

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

USDA Memo CACFP 01-2025: Nutrition Requirements for Fluid Milk and Fluid Milk

Substitutions in the Child and Adult Care Food Program, Questions and Answers:

<https://fns-prod.azureedge.us/sites/default/files/resource-files/CACFP01-2025os.pdf>

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For more information, visit the Connecticut State Department of Education's (CSDE) [Special Diets in the Child and Adult Care Food Program](#) 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/identify\\_allowable\\_nondairy\\_milk\\_substitutes\\_cacfp.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/identify_allowable_nondairy_milk_substitutes_cacfp.pdf).



# Identifying Products that Meet USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP

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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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