

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

This document indicates how to determine if commercial 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.

The guidance in 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 in CACFP Child Care Programs](#) or [Guide to Meal Modifications in CACFP Adult Day Care Centers](#).

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The USDA allows CACFP sponsors to offer fluid milk substitutes for participants who do not consume regular cow's milk due to non-disability reasons. These fluid milk substitutes must comply with the USDA's nutrition standards for fluid milk substitutes ([7 CFR 210.10\(d\)\(3\)](#)). Beverages that do not meet these requirements cannot be served in CACFP 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](#).

Fluid milk substitutes are plant-based beverages designed to replace cow's milk, such as soy milk, almond milk, rice milk, and oat milk. Fluid milk substitutes must meet the USDA's nutrition standards for fluid milk substitutes. CACFP sponsors may offer allowable fluid milk substitutes as a replacement for cow's milk in meals and snacks for participants who do not consume milk due to non-disability reasons. Only certain brands of fluid milk substitutes meet the USDA's standards.

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 fluid milk substitute for a non-disability reason, CACFP child care programs and adult day care centers must obtain a written request that identifies the reason for the milk substitute from one of the following:

- 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 for child care centers in public schools: 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 offered in child care centers in public schools must meet the state beverage requirements for nondairy milk substitutes under [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 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).

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Check that the product also meets the additional requirements for ages 1-5 and child care centers in public schools 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 ¹	Column 3 Rounded % DV ²	Column 4 Product information ³	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

¹ 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](#)).

² 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](#)).

³ 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

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

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))

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 in CACFP Adult Day Care Centers (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide_meal_modifications_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

Milk Substitutes (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>

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 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 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 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.

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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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