

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

The guidance in this document applies to meals and snacks served in child care centers, family day care homes, emergency shelters, and at-risk afterschool care centers that participate in the U.S. Department of Agriculture’s (USDA) Child and Adult Care Food Program (CACFP).

This document summarizes the requirements for meal modifications for children without a disability who cannot drink milk. The requirements for meal modifications for children with a disability that restricts their diet are different and must comply with the federal nondiscrimination laws and regulations. For detailed guidance on meal modifications in the CACFP, refer to the Connecticut State Department of Education’s (CSDE) [*Guide to Meal Modifications in CACFP Child Care Programs*](#).



CACFP facilities have the option to offer one or more allowable fluid milk substitutes for children whose special dietary needs do not constitute a disability. If the CACFP facility chooses to make allowable milk substitutes available, they must be available for all children when requested by a parent or guardian. The USDA does not provide additional reimbursement for these substitutions.

Allowable Fluid Milk Substitutes

The USDA allows two types of milk substitutes for children whose special dietary needs do not constitute a disability: 1) lactose-free or lactose-reduced milk that meets the appropriate fat content and flavor restriction for each age group of the CACFP meal patterns; and 2) nondairy milk substitutes that meet the USDA’s nutrition standards for fluid milk substitutes. All milk substitutes in child care centers that operate in public schools must also meet the state beverage requirements of [Section 10-221q](#) of the Connecticut General Statutes (C.G.S.) (refer to “[Additional State Requirements for Milk Substitutes in Public Schools](#)” in this document).

Nondairy milk substitutes (such as soy milk) require a written request from the parent or guardian that identifies the medical or other special dietary need that restricts the child’s diet. A medical statement signed by a recognized medical authority is not required. Lactose-free milk and lactose-reduced milk are fluid milk and credit as the milk component in the CACFP meal patterns; they do not require a written statement from a parent or guardian.

Table 1 summarizes the requirements for each type of allowable milk substitute in the CACFP meal patterns for children. CACFP facilities may choose to offer only one milk substitute. If children decide not to take this option, the CACFP facility is not obligated to offer any other milk substitutes.

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Table 1. Requirements for fluid milk substitutes in the CACFP meal patterns for children		
Allowable substitution	Nutrition requirements	Required documentation
Nondairy milk substitutes, e.g., soy milk	<ul style="list-style-type: none"> Must meet the USDA's nutrition standards for fluid milk substitutes (refer to table 2). Must be unflavored for ages 1-5. May be flavored for ages 6 and older but the USDA's CACFP Best Practices recommends serving only unflavored nondairy milk substitutes. Additional requirements for child care centers in public schools: Must meet the state requirements for nondairy milk substitutes (refer to "Additional Milk Substitute Requirements for Child Care Programs in Public Schools" in this document). 	Written request from the parent or guardian that identifies the medical or other special dietary need that restricts the child's diet. Maintain on file with child's medical records.
Lactose-free or lactose-reduced milk	<ul style="list-style-type: none"> Must meet the appropriate fat content for each age group of the CACFP meal patterns: whole milk (unflavored) for age 1; and low-fat or fat-free milk (unflavored) for ages 2 and older. May be flavored for ages 6 and older, but the USDA's CACFP Best Practices recommends serving only unflavored milk. Additional requirements for child care centers in public schools: Must meet the state requirements for milk (refer to "Additional Milk Substitute Requirements for Child Care Programs in Public Schools" in this document). <p>These types of milk are regular fluid milk modified by the addition of lactase enzymes to reduce or eliminate lactose (milk sugar). Lactose-reduced milk has part of the lactose removed, while lactose-free milk has all lactose removed. Like other types of fluid milk, lactose-reduced milk and lactose-free milk come in a variety of flavors and fat contents, such as fat free (skim), low fat, and whole. The USDA recommends that lactose-free or lactose-reduced milk is the first choice for children with lactose intolerance.</p>	None. Lactose-reduced milk and lactose-free milk credit as the milk component in the CACFP meal patterns.

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USDA's Nutrition Standards for Milk Substitutes

CACFP facilities that choose to offer a nondairy milk substitute for children without a disability must use products that meet the USDA's nutrition standards for fluid milk substitutes (refer to table 2 below). Products might list nutrient values, percent Daily Value (% DV) (either unrounded or rounded), or both. If any nutrient values are missing, this information must be obtained from the manufacturer.

To be an allowable nondairy milk substitute, the product must meet each nutrient standard (nutrients per cup) in column 1 or the unrounded or rounded % DV in column 2).

Table 2. USDA's nutrition standards for fluid milk substitutes		
Column 1	Column 2	
Nutrients per cup (8 fluid ounces)	% DV Unrounded ¹	% DV Rounded ²
Calcium: 276 milligrams (mg)	21.23%	20%
Protein: 8 grams (g)	16%	16%
Vitamin A: 500 international units (IU) or 150 micrograms (mcg) retinol activity equivalent (RAE) ³	16.67%	20%
Vitamin D: 100 IU or 2.5 micrograms (mcg) ³	12.5%	15%
Magnesium: 24 mg	5.71%	6%
Phosphorus: 222 mg	17.76%	20%
Potassium: 349 mg	7.43%	10%
Riboflavin: 0.44 mg	33.85%	35%
Vitamin B12: 1.1 mcg	45.83%	45%
¹ The unrounded % DV is the minimum nutrients per cup (column 1) 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 The 2016 FDA final rule, Food Labeling: Revision of the Nutrition and Supplement Facts Labels , updated the Nutrition Facts label to change IUs to mcg for vitamins A and D.		

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

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For children 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 child has a medically documented disability that specifically requires this substitution. For guidance on noncompliant beverages, refer to "[Noncompliant Substitutions](#)" in this document.

Additional Milk Substitute Requirements for Child Care Programs in Public Schools

In addition to meeting the USDA's nutrition standards for fluid milk substitutes, nondairy milk substitutes (such as soy milk) served by child care programs that operate in public schools must meet the state beverage requirements of [C.G.S. Section 10-221q](#). The state beverage statute requires that nondairy milk substitutes 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.

In addition to meeting the requirements for fluid milk in the CACFP meal patterns, all lactose-free or lactose-reduced milk served by child care programs that operate in public schools must meet the state beverage requirements of [C.G.S. Section 10-221q](#). The state beverage statute requires that milk cannot contain artificial sweeteners and cannot exceed 4 grams of sugar per ounce.

Acceptable Milk Substitute Products

[Table 3](#) identifies commercial products that meet the USDA's nutrition standards for fluid milk substitutes. This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA.

Certain brands of soy milk and oat milk are the only currently available nondairy milk products that meet these requirements. Almond milk, cashew milk, rice milk, some brands of soy milk, most brands of oat milk, and other nondairy milk products do not meet these requirements and cannot substitute for milk in the CACFP meal patterns.

Not all brands of soy milk or oat milk meet the USDA's requirements. Before purchasing any type of nondairy milk substitute, CACFP facilities must ensure that the product complies with the USDA's nutrition standards for fluid milk substitutes (refer to [table 2](#)).

If a commercial product is not included in table 3, the CACFP facility must determine if it meets the USDA's nutrition standards for fluid milk substitutes. The Nutrition Facts label does not usually include all 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

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nutrient information, the CACFP facility 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 2](#)).

CACFP facilities 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. The CACFP facility 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 (refer to [table 2](#)). CACFP facilities are encouraged to submit this information to the CSDE so that new acceptable products may be added to the list of approved products (refer to [table 3](#)).

For guidance on how to determine if nondairy beverages credit as milk substitutes, refer to the CSDE's *[Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP](#)*. For child care programs operating in public schools, nondairy milk substitutes that meet the USDA's nutrition standards must also meet the state beverage requirements (refer to "[Additional Milk Substitute Requirements for Child Care Programs in Public Schools](#)" in this document).

Required Documentation

Milk substitutes for children without a disability do not require a medical statement from a recognized medical authority. However, nondairy milk substitutes (such as soy milk) require a written request from the parent or guardian that identifies the medical or other special dietary need that restricts the child's diet and requires the nondairy milk substitute. CACFP facilities must maintain requests for nondairy milk substitutes on file with children's medical records.

The USDA's provision allowing a written request from parents or guardians instead of a medical statement applies only to milk substitutes for children without a disability. It does not apply to any other substitutions of foods or beverages in reimbursable meals and snacks for children without a disability. For more information on the requirements for meal modifications for children without a disability, refer to section 3 of the CSDE's *[Guide to Meal Modifications in CACFP Child Care Programs](#)*.

Lactose-free milk and lactose-reduced milk are fluid milk and credit as the milk component in the CACFP meal patterns; they do not require a written statement from a parent or guardian.

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Table 3. Milk substitutes meeting the USDA's nutrition standards ¹

Unflavored milk substitutes (allowed for ages 1 and older)

Manufacturer	Product	Container size (fluid ounces)	UPC codes
Campbell's Food Service	Pacific Foods Ultra Soy Original Plant-based Beverage	32	Unit: 0-52603-08200-6 12-count case: 100-52603-08200-3
Kikkoman	Pearl Organic Soymilk, Smart Original, aseptic package	8	Unit: 0-41390-06183-7 24-count case: 100-41390-06183-4
Marcel's Modern Pantry	Plant-based Oat Protein Beverage, 8 fl oz aseptic container	8	Unit 7-54686-00279-6 27 count case: 107-54686-00279-
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	32	Unit: 0-52603-08200-6 12-count case: 100-52603-08200-6
Ripple Foods	Ripple Dairy-free Milk, Original, aseptic package ²	8	Unit: 8-55643-00611-3 48-count case: 108-10029-77028-3
Stremick's Heritage Foods	8th Continent Soymilk, Original, refrigerated	64	Unit: 0-53859-07066-3
Sunrich Naturals	Soymilk, Original, aseptic package ²	8	Unit: 7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package ²	32	Unit: 7-82758-33232-8
Walmart	Great Value Soymilk, Original, paper carton ²	32	Unit: 0-78742-09387-1

¹ This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA. CACFP facilities are responsible for ensuring that all nondairy milk substitutes served in reimbursable meals and snacks meet the USDA's requirements. Manufacturers may discontinue products or change product formulations.

² These beverages exceed the fat limit for nondairy milk substitutes required by [C.G.S. Section 10-221q](#). They cannot be served as a milk substitute in CACFP child care programs that operate in public schools.

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Table 3. Milk substitutes meeting the USDA's nutrition standards ¹, *continued*

Flavored milk substitutes (allowed only for ages 6 and older) ^{2, 3}

Manufacturer	Product	Container size (fluid ounces)	UPC codes
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8	Unit: 0-41390-06185-1 24-count case: 100-41390-06185-8
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8	Unit: 0-41390-06184-4 24-count case: 100-41390-06184-1
Ripple Foods	Ripple Dairy-free Milk, Chocolate, aseptic package	8	Unit: 8-55643-00615-1 48-count case: 108-10029-77030-6
Ripple Foods	Ripple Dairy-free Milk, Vanilla, aseptic package	8	Unit: 8-55643-00612-0 48-count case: 108-10029-77029-0
Stremick's Heritage Foods	8th Continent Soymilk, Vanilla, refrigerated	64	Unit: 0-53859-07067-0
Sunrich Naturals	Soymilk, Unsweetened Vanilla, aseptic package ²	32	Unit: 7-82758-33932-7
Sunrich Naturals	Soymilk, Vanilla, aseptic package	32	Unit: 7-82758-33132-1
Sunrich Naturals	Soymilk, Vanilla, aseptic package	8	Unit: 7-82758-33208-3

¹ This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA. Manufacturers may discontinue products or change product formulations. CACFP facilities are responsible for ensuring that all nondairy milk substitutes served in reimbursable meals and snacks meet the USDA's requirements.

² These beverages exceed the fat limit for nondairy milk substitutes required by [C.G.S. Section 10-221q](#). They cannot be served as a milk substitute in CACFP child care programs that operate in public schools.

³ Flavored nondairy milk substitutes are allowed for ages 6 and older but the USDA's [CACFP Best Practices](#) recommends serving only unflavored milk substitutes.

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Noncompliant Substitutions

If a child's dietary restriction is not related to a disability, CACFP facilities 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 (e.g., substitutes (e.g., almond milk, rice milk, cashew milk, some brands of soy milk, and most brands of oat milk);
- nutrition supplement beverages (e.g., Abbott's Pediasure); and
- powdered milk beverages (e.g., Nestle's NIDO).

CACFP meals and snacks for children without a disability are not reimbursable if they contain any of these beverages in place of milk. If the CACFP facility chooses to make milk substitutes available, they must include at least one choice of either lactose-reduced or lactose-free milk, 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 children without a disability.

Resources

Bite Size: Meeting the CACFP Meal Patterns for Children: Module 3: Milk Component (CSDE webinar):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs/Related-Resources#BiteSize>

CACFP Best Practices (USDA):

https://fns-prod.azureedge.us/sites/default/files/cacfp/CACFP_factBP.pdf

CACFP Meal Patterns for Children (CSDE):

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

Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the CACFP (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Determining-Allowable-Nondairy-Milk-Substitutes-CACFP.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>

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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 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](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](https://www.fda.gov/food/nutrition-facts-label/daily-value-nutrition-and-supplement-facts-labels)

Requirements for Meal Modifications in CACFP Child Care Programs (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/
Meal_Modifications_CACFP_Presentation.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal_Modifications_CACFP_Presentation.pdf)

Serving Milk in the CACFP (USDA):

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

Special Diets in CACFP Child Care Programs (CSDE):

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

Summary of Requirements for Meal Modifications for Children in the CACFP (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/
Summary_Chart_Meal_Modifications_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary_Chart_Meal_Modifications_CACFP.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](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 Child Care Programs](#) 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/Milk_Substitutes_CACFP.pdf.

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1. mail: U.S. Department of Agriculture
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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

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