

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

This document summarizes the requirements for fluid milk substitutes for children who do not consume regular cow’s milk due to non-disability reasons. These requirements apply to all CACFP child care facilities that participate in the U.S. Department of Agriculture’s (USDA) Child and Adult Care Food Program (CACFP), including child care centers, family day care homes, emergency shelters, and at-risk afterschool care centers.

The requirements in this document do not apply to fluid milk substitutes for children 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](#).

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Allowable Substitutions for Regular Cow's Milk

The USDA allows two types of substitutions for children who do not consume regular cow's milk due to non-disability reasons.

1. Lactose-free/reduced milk

Lactose-free/reduced milk are fluid milk and credit the same as regular milk in the milk component for the [CACFP meal patterns for children](#). These types of milk are processed by adding lactase enzymes to reduce or eliminate the lactose (naturally occurring milk sugar) found in regular milk. Children who cannot digest the lactose found in regular milk may be able to drink lactose-free/reduced milk. The USDA recommends these types of milk as the first choice for children with lactose intolerance.

Lactose-free/reduced milk must meet the following meal pattern requirements for each age group: unflavored whole milk for age 1; unflavored low-fat or fat-free milk for ages 2-5; and low-fat or fat-free milk (either unflavored or flavored) for ages 6 and older. Lactose-free/reduced milk served in child care centers operating in public schools must also meet the additional state beverage requirements for milk under Connecticut General Statutes (C.G.S.) [Section 10-221q](#) (refer to "[Additional State Beverage Requirements for Public Schools](#)" in this document).

2. Fluid milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes

Section [7 CFR 226.20\(g\)\(3\)](#) of the CACFP regulations allow CACFP facilities to choose to offer one or more fluid milk substitutes for non-disability reasons. 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 for non-disability reasons must meet the USDA's nutrition standards for fluid milk substitutes (refer to [table 2](#)). Only certain brands of fluid milk substitutes meet these standards.

Fluid milk substitutes served in child care centers operating in public schools must also meet the additional state beverage requirements for nondairy milk substitutes under [C.G.S. Section 10-221q](#) (refer to "[Additional State Beverage Requirements for Public Schools](#)" in this document).

Table 1 summarizes these requirements.

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Table 1. Summary of federal and state requirements

Requirements	Lactose-free/reduced milk	Fluid milk substitutes
Federal nutrition standards (USDA)	<p>Must meet the appropriate CACFP meal pattern requirements for each age group.</p> <ul style="list-style-type: none"> • Age 1: whole milk, unflavored • Ages 2-5: low-fat or fat-free milk, unflavored • Ages 6 and older: low-fat or fat-free milk, unflavored or flavored 	<p>Must meet the USDA's nutrition standards for fluid milk substitutes (refer to table 2).</p>
State nutrition standards (C.G.S. Section 10-221q: beverages)	<p>Applies only to child care centers operating in public schools: No artificial sweeteners and cannot exceed 4 grams of sugar per ounce (refer to “Additional State Beverage Requirements for Public Schools” in this document).</p>	<p>Applies only to child care centers operating in public schools: No 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 (refer to “Additional State Beverage Requirements for Public Schools” in this document).</p>
Documentation	<p>None: Lactose-free/reduced milk are fluid milk and credit as the milk component in the CACFP meal patterns.</p>	<p>Written request from the parent/guardian, a state licensed healthcare professional, or a registered dietitian that identifies the reason for the fluid milk substitute. substitute (refer to “Required Documentation for Fluid Milk Substitutes” in this document). Maintain on file with the child's medical records.</p>

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USDA’s Nutrition Standards for Fluid Milk Substitutes

CACFP facilities that choose to offer one or more fluid milk substitutes for non-disability reasons must use commercial products that meet the USDA’s nutrition standards for fluid milk substitutes. These nutrition standards ensure that children who require a fluid milk substitute receive the important nutrients found in milk.

Fluid milk substitutes must meet each nutrient standard (nutrients per cup) or the percent daily value (% DV). The manufacturer’s nutrition information might list the nutrient values, the unrounded or rounded percent Daily Value (% DV), or both. If any nutrient values are missing, the CACFP facility must obtain this information from the manufacturer.

Table 2. USDA’s nutrition standards for fluid milk substitutes

Nutrients per cup (8 fluid ounces)	Unrounded % DV ¹	Rounded % DV ²
Calcium: 276 milligrams (mg)	21.23%	20%
Protein: 8 grams (g)	16%	16%
Vitamin A: 150 micrograms (mcg) retinol activity equivalent (RAE)	16.67%	20%
Vitamin D: 2.5 micrograms (mcg)	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 divided by the current daily value for each nutrient (refer to the Food and Drug Administration’s (FDA) [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](#)).

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Effective July 1, 2024, the USDA final rule, *Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans*, updated the units for the vitamin A and vitamin D requirements for fluid milk substitutes to align with the FDA labeling requirements (FDA final rule 81 FR 33742, *Food Labeling: Revision of the Nutrition and Supplement Facts Labels*). The unit requirement for vitamin A is now 150 mcg RAE per 8 fluid ounces, instead of 500 IUs. The unit requirement for vitamin D is now 2.5 mcg per 8 fluid ounces, instead of 100 IUs. The amount of vitamin A and vitamin D required in fluid milk substitutes does not change; only the unit of measurement has changed to conform to FDA labeling requirements.

Commercial products that meet the USDA's nutrition standards for fluid milk substitutes are identified in table 3 (unflavored products allowed for all ages) and table 4 (flavored products allowed only for ages 6 and older). These lists are for informational purposes only and do not imply endorsement by the CSDE or USDA. Since manufacturers may discontinue products or change their formulation, CACFP facilities are responsible for checking fluid milk substitutes to ensure they meet the USDA's requirements (refer to table 2).

Before purchasing any type of fluid milk substitute, CACFP facilities must ensure it complies with the USDA's nutrition standards for fluid milk substitutes (refer to [table 2](#)).

Certain brands of soy milk and oat milk are the only currently available commercial 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 be offered as fluid milk substitutes for non-disability reasons in the CACFP.

When a commercial product is not listed in table 3 or 4, 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 needed to identify if a fluid milk substitute product complies with the USDA's nutrition standards for fluid milk substitutes. If any nutrient information is missing, CACFP facilities must contact the manufacturer to obtain documentation that 1 cup provides the minimum amount of each nutrient (refer to table 2).

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Screening products using the USDA's protein standard

CACFP facilities may use the USDA's protein standard to screen commercial products and determine if they might meet the USDA's nutrition standards for fluid milk substitutes. These standards require at least 8 grams of protein per cup (8 fluid ounces).

- If the product's Nutrition Facts label lists less than 8 grams of protein per cup, the product does not meet the USDA's nutrition standards for fluid milk substitutes.
- If the product's Nutrition Facts label lists at least 8 grams of protein per cup, the product might meet the USDA's nutrition standards for fluid milk substitutes. 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. CACFP facilities are encouraged to submit this information to the CSDE so that new acceptable fluid milk substitutes can be added to the list of approved products

For guidance on how to determine if nondairy beverages credit as fluid milk substitutes, refer to the CSDE's resource, [Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the Child and Adult Care Food Program](#).

Additional State Beverage Requirements for Child Care Programs in Public Schools

In addition to meeting the USDA's requirements, child care programs in public schools must comply with the state beverage requirements of [C.G.S. Section 10-221q](#). These requirements apply to all types of fluid milk (including lactose-free/reduced milk) and fluid milk substitutes available for sale to students in public schools as part of and separately from reimbursable meals and snacks.

- Lactose-free/reduced milk cannot contain artificial sweeteners and cannot exceed 4 grams of sugar per ounce.
- Fluid 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.

The state beverage statute does not apply to any other child care programs.

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Table 3. Unflavored fluid milk substitutes (allowed for all ages)

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 ¹	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 ¹	8	Unit: 7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package ¹	32	Unit: 7-82758-33232-8
Walmart	Great Value Soymilk, Original, paper carton ¹	32	Unit: 0-78742-09387-1

¹ **Not allowed in child care programs operating in public schools:** These beverages exceed the fat limit for nondairy milk substitutes required by [C.G.S. Section 10-221q](#) and cannot be served as a fluid milk substitute in CACFP child care programs that operate in public schools.

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Table 4. Flavored fluid milk substitutes (allowed only for ages 6 and older)

Flavored milk substitutes are allowed for ages 6 and older. However, the USDA's [CACFP best practices](#) recommend serving only unflavored fluid milk substitutes.

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 ¹	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 **Not allowed in child care programs operating in public schools:** These beverages exceed the fat limit for nondairy milk substitutes required by [C.G.S. Section 10-221q](#) and cannot be served as a fluid milk substitute in CACFP child care programs that operate in public schools.

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Required Documentation for Fluid Milk Substitutes

CACFP facilities 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 facilities must obtain a written request from the parent/guardian, a state licensed healthcare professional (i.e., physician, physician assistant, certified physician assistant, doctor of osteopathy, and advanced practice registered nurse), or a registered dietitian or registered dietitian nutritionist that identifies the reason for the fluid milk substitute. For example, a parent may submit a written request for an allowable brand of soy milk because her child is a vegetarian. CACFP facilities must maintain all requests for fluid milk substitutes on file with children's other medical records.

The provision allowing parents or guardians to submit a written request applies only to fluid milk substitutes for non-disability reasons. The USDA does not allow written parent/guardian requests for any other substitutions of foods or beverages in reimbursable meals and snacks for children with or without a disability.

Documentation is not required for lactose-free/reduced milk. These products are fluid milk and credit as the milk component in the CACFP meal patterns.



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Considerations for Fluid Milk Substitutes

The considerations below apply to CACFP facilities that choose to offer allowable fluid milk substitutes for children who do not consume regular cow's milk due to non-disability reasons.

Variety of choices

Since fluid milk substitutes are optional, CACFP facilities may decide how many types to offer. CACFP facilities that offer more than one allowable milk substitute must inform all parents/guardians of the options and allow all parents/guardians to choose one.

CACFP facilities may choose to offer only one fluid milk substitute. If children decide not to take this option, the CACFP facility is not obligated to offer any other fluid milk substitutes.

Availability

If CACFP facilities choose to offer allowable fluid milk substitutes, they must be available for all children when requested by their parents/guardians. If the CACFP facility grants a request for any fluid milk substitute, all requests for that substitute must be granted.

- **Example:** A child care center chooses to provide an allowable brand of soy milk at a parent's request. That allowable brand of soy milk must be available to all students whose parents/guardians make any request for fluid milk substitutes.

The child's fluid milk substitute approval must remain in effect until the student's parent/guardian, state licensed healthcare professional, or registered dietitian revokes the request in writing, or until the CACFP facility changes its fluid milk substitute policy.

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Beverages Not Allowed for Non-disability Reasons

Except for lactose-free/reduced milk and allowable fluid milk substitutes, CACFP facilities cannot substitute any other beverages for non-disability reasons. Some examples of beverages that are not allowed include:

- juice;
- water;
- fluid milk substitutes that do not comply with the USDA's nutrition standards for fluid milk substitutes, such as almond milk, rice milk, cashew milk, some brands of soy milk, and most brands of oat milk;
- nutrition supplement beverages, such as Abbott's Pediasure; and
- powdered milk beverages, such as Nestle's NIDO.

CACFP facilities can never substitute water and juice for milk for non-disability reasons in reimbursable meals and snacks.

Meals and snacks that offer these types of beverages in place of milk are not reimbursable unless the child has a medically documented disability that specifically requires this substitution. For information on the requirements for meal modifications for disability reasons, refer to the CSDE's [Guide to Meal Modifications in CACFP Child Care Programs](#).



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Resources

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

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

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 Meal Patterns for Children (CSDE's Meal Patterns for CACFP Child Care Programs webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-cacfp-child-care-programs/#MealPatternsChildren>

CACFP Meal Pattern Updates (CSDE Child and Adult Care Food Program (CACFP) webpage):

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

CACFP regulations 7 CFR 226.20(g)(1): Modifications for disability reasons (USDA):

[https://www.ecfr.gov/current/title-7/part-226#p-226.20\(g\)\(1\)](https://www.ecfr.gov/current/title-7/part-226#p-226.20(g)(1))

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))

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

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

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

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

Milk Substitutes ("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>

Serving Milk in the CACFP (USDA):

<https://www.fns.usda.gov/tn/serving-milk-cacfp>

Special Diets in CACFP Child Care Programs (CSDE):

<https://portal.ct.gov/sde/nutrition/special-diets-in-cacfp-child-care-programs>

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Summary Charts of the 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

USDA 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>

USDA Final Rule (89 FR 31962): Child Nutrition Programs: Meal Patterns Consistent with the 2020-2025 Dietary Guidelines for Americans:
<https://www.federalregister.gov/documents/2024/04/25/2024-08098/child-nutrition-programs-meal-patterns-consistent-with-the-2020-2025-dietary-guidelines-for>

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/qas-milk-substitution-children-medical-or-special-dietary-needs-non-disability>

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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
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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