

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

The guidance in this document applies to meals and snacks served in adult day 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 participants without a disability who cannot drink milk. The requirements for meal modifications for participants 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 for CACFP Adult Day Care Centers\*](#).



Adult day care centers have the option to offer one or more allowable fluid milk substitutes for participants whose special dietary needs do not constitute a disability. If the adult day care center chooses to make allowable milk substitutes available, they must be available for all participants when requested by the participant or their guardian/caregiver. The USDA does not provide additional reimbursement for these substitutions.

## Allowable Fluid Milk Substitutes

The USDA allows two types of milk substitutes for participants whose special dietary needs do not constitute a disability: 1) lactose-free or lactose-reduced milk that is low fat or fat free; and 2) nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes.

Nondairy milk substitutes (such as soy milk) require a written request from the participant or their guardian/caregiver that identifies the medical or other special dietary need that restricts the participant'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 adult meal patterns; they do not require a written statement from the participant or their guardian/caregiver.

Table 1 summarizes the requirements for each type of allowable milk substitute in the CACFP adult meal patterns. Adult day care centers may choose to offer only one milk substitute. If participants decide not to take this option, the adult day care center is not obligated to offer any other milk substitutes.

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**Table 1. Requirements for fluid milk substitutes in the CACFP adult meal patterns**

Allowable substitution	Nutrition requirements	Required documentation
<b>Nondairy milk substitutes, e.g., soy milk</b>	<ul style="list-style-type: none"> <li>Must meet the USDA's nutrition standards for fluid milk substitutes (refer to <a href="#">table 2</a>).</li> <li>May be flavored but the USDA's <a href="#">CACFP Best Practices</a> recommends serving only unflavored nondairy milk substitutes.</li> </ul>	Written request from the participant or their guardian/caregiver that identifies the medical or other special dietary need that restricts the participant's diet. Maintain on file with participant's medical records.
<b>Lactose-free or lactose-reduced milk</b>	<ul style="list-style-type: none"> <li>Must be low-fat or fat-free.</li> <li>May be flavored but the USDA's <a href="#">CACFP Best Practices</a> recommends serving only unflavored milk.</li> </ul> <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 participants with lactose intolerance.</p>	None. Lactose-reduced milk and lactose-free milk credit as the milk component in the CACFP adult meal patterns.

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## USDA's Nutrition Standards for Milk Substitutes

Adult day care centers that choose to offer a nondairy milk substitute for participants 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 <sup>1</sup>	% DV Rounded <sup>2</sup>
<b>Calcium:</b> 276 milligrams (mg)	21.23%	20%
<b>Protein:</b> 8 grams (g)	16%	16%
<b>Vitamin A:</b> 500 international units (IU) or 150 micrograms (mcg) retinol activity equivalent (RAE) <sup>3</sup>	16.67%	20%
<b>Vitamin D:</b> 100 IU or 2.5 micrograms (mcg) <sup>3</sup>	12.5%	15%
<b>Magnesium:</b> 24 mg	5.71%	6%
<b>Phosphorus:</b> 222 mg	17.76%	20%
<b>Potassium:</b> 349 mg	7.43%	10%
<b>Riboflavin:</b> 0.44 mg	33.85%	35%
<b>Vitamin B12:</b> 1.1 mcg	45.83%	45%
<sup>1</sup> 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 <a href="#">Reference Guide: Daily Values for Nutrients</a> ). <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 href="#">A Food Labeling Guide: Guidance for Industry</a> ). <sup>3</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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Adult day care centers may serve flavored nondairy milk substitutes, but the USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.

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

### 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 adult meal patterns.

Not all brands of soy milk or oat milk meet the USDA's requirements. Before purchasing any type of nondairy milk substitute, adult day care centers 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 adult day care centers 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 nutrient information, the adult day care center 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](#)).

Adult day care centers 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

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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 adult day care center 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](#)). Adult day care centers 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 assistance with evaluating products for compliance, please contact the CSDE.

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](#).

### Required Documentation

Milk substitutes for participants 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 participant or their guardian/caregiver that identifies the medical or other special dietary need that restricts the participant's diet and requires the nondairy milk substitute. Adult day care centers must maintain requests for nondairy milk substitutes on file with participant's medical records.

The USDA's provision allowing a written request from the participant or their guardian/caregiver instead of a medical statement applies only to milk substitutes for participants without a disability. It does not apply to any other substitutions of foods or beverages in reimbursable meals and snacks for participants without a disability. Any other optional modifications for participants without a disability must meet the CACFP adult meal patterns. For more information on the requirements for meal modifications for participants without a disability, refer to section 3 of the CSDE's [Guide to Meal Modifications for CACFP Adult Day Care Centers](#).

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

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**Table 3. Milk substitutes meeting the USDA's nutrition standards <sup>1</sup>**

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

<sup>1</sup> This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA. CACFP adult day care centers 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.

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

### Flavored milk substitutes <sup>2</sup>

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 <sup>1</sup>	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

<sup>1</sup> This list is for informational purposes only and does not imply endorsement by the CSDE or the USDA. CACFP adult day care centers 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.

<sup>2</sup> The USDA's [\*CACFP Best Practices\*](#) recommends serving only unflavored milk substitutes.

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## Noncompliant Substitutions

If a participant's dietary restriction is not related to a disability, adult day care centers 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, such as Abbott's Ensure and Nestle's Boost;
- powdered milk beverages.
- soda (regular and diet); and
- coffee and tea.

CACFP meals and snacks for participants without a disability are not reimbursable if they contain any of these beverages in place of milk. If the adult day care center 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 participants without a disability.

## Resources

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)

CACFP Meal Patterns for Adults (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/Adult\\_Meal\\_Pattern\\_CACFP.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/Adult_Meal_Pattern_CACFP.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](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>



## Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP

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

[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)

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>

Reference Guide: Daily Values for Nutrients (FDA):

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

Requirements for Meal Modifications in CACFP Adult Day Care Centers (CSDE presentation):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal\\_Modifications\\_CACFP\\_Adults\\_Presentation.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal_Modifications_CACFP_Adults_Presentation.pdf)

Serving Milk in the CACFP (USDA):

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

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

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

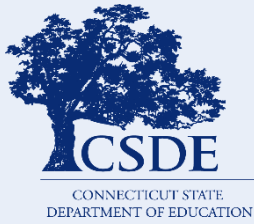
Summary of Requirements for Meal Modifications for Adult Participants in the CACFP (CSDE):

[https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary\\_Chart\\_Meal\\_Modifications\\_CACFP\\_Adults.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary_Chart_Meal_Modifications_CACFP_Adults.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>

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For more information, visit the CSDE's [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/Milk\\_Substitutes\\_CACFP\\_Adults.pdf](https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP_Adults.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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