

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

This document summarizes the requirements for fluid milk substitutes (nondairy beverages) for participants who do not consume regular cow’s milk due to non-disability reasons. These requirements apply to all adult day care centers that participate in the U.S. Department of Agriculture’s (USDA) [Child and Adult Care Food Program \(CACFP\)](#).

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 Adult Day Care Centers in the Child and Adult Care Food Program](#).



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Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the CACFP

The USDA allows optional fluid milk substitutes (nondairy beverages) for participants who do not consume regular cow's milk due to non-disability reasons. Adult day care centers may choose, but are not required, to offer one or more nondairy beverages to all students.

Allowable Fluid Milk Substitutes (Nondairy Beverages)

Section [7 CFR 226.20\(g\)\(3\)](#) of the CACFP regulations allows adult day care centers to choose to offer one or more fluid milk substitutes (nondairy beverages) for non-disability reasons. Fluid milk substitutes are plant-based beverages like fortified soy milk that are intended to replace cow's milk.

Nondairy milk substitutes for non-disability reasons must meet the USDA's nutrition standards for fluid milk substitutes defined in [7 CFR 226.20\(g\)\(3\)\(ii\)](#) of the CACFP regulations (refer to [table 2](#)) 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.

Required Documentation for Nondairy Beverages

Nondairy milk substitutes for non-disability reasons require a written statement that identifies the need for the milk substitute. This statement may be submitted by the participant or their guardian/caregiver, a state licensed healthcare professional, or a registered dietitian.

Adult day care centers must maintain all requests for fluid milk substitutes on file with participants' other medical records.

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

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USDA’s Nutrition Standards for Fluid Milk Substitutes

Adult day care centers that choose to offer one or more nondairy 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 participants who require a nondairy milk substitute receive the important nutrients found in milk.

Nondairy 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, adult day care centers must obtain this information from the manufacturer.

Table 1. 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) ³	16.67%	20%
Vitamin D: 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 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 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](#)).

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Identifying Acceptable Nondairy Beverage Products

Commercial products that meet the USDA's nutrition standards for fluid milk substitutes are identified in tables 2 and 3. 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, adult day care centers are responsible for checking fluid milk substitutes to ensure they meet the USDA's requirements (refer to table 2).

Screening products using the USDA's protein standard

Adult day care centers may use the USDA's protein standard to screen commercial nondairy beverages 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 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. Adult day care centers are encouraged to submit this information to the CSDE so 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](#).

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Table 2. Allowable Unflavored Fluid 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

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Table 3. Allowable Flavored Fluid Milk Substitutes

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	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

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Considerations for Offering Nondairy Milk Substitutes

The considerations below apply to adult day care centers that choose to offer allowable nondairy milk substitutes for participants who do not consume regular cow's milk due to non-disability reasons.

Variety of choices

Since nondairy milk substitutes are optional, adult day care centers may decide how many choices to offer. Adult day care centers may choose to offer only one nondairy milk substitute. If participants decide not to take this option, adult day care centers are not obligated to offer any other nondairy milk substitute.

Availability

If adult day care centers choose to offer allowable nondairy beverages, they must be available for all participants when requested by their parents/guardians. If the adult day care center grants a request for any nondairy beverage, all requests for that substitute must be granted.

- **Example:** An adult day care center chooses to provide an allowable brand of soy milk at a participant's request. That allowable brand of soy milk must be available to all participants who make any request for fluid milk substitutes.

The participant's nondairy beverage approval must remain in effect until the participant, their parent/guardian, state licensed healthcare professional, or registered dietitian revokes the request in writing, or until the adult day care center changes its fluid milk substitute policy.

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Beverages Not Allowed for Non-disability Reasons

Adult day care centers cannot substitute any other beverages as modifications to reimbursable meals and snacks for non-disability reasons. Some examples of beverages that are not allowed include:

- juice;
- water;
- nondairy 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;
- lactase-free/reduced milk that does not meet the required fat content or flavor restrictions for each CACFP meal pattern;
- nutrition supplement beverages; and
- powdered milk beverages.

Adult day care centers can never substitute water or 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 participant 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 for Adult Day Care Centers in the Child and Adult Care Food Program](#).

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Summary of Requirements for Optional Nondairy Milk Substitutes

The table below summarizes the federal and state requirements for optional nondairy milk substitutes in the CACFP.

Table 4. Summary of federal and state requirements

Requirement	Implementation guidance
Allowable types (USDA meal pattern regulations)	Nondairy beverages must meet the USDA’s nutrition standards for fluid milk substitutes (refer to “ USDA’s Nutrition Standards for Fluid Milk Substitutes ” and table 2 in this document).
Documentation required	Nondairy beverages require a written statement that identifies the need for the milk substitute (refer to “ Required Documentation for Nondairy Beverages ” in this document).
Identifying allowable products	Commercial products that meet the federal and state requirements for nondairy beverages are included in tables 3 and 4 (refer to “ Identifying Acceptable Nondairy Beverage Products ” in this document).

Resources

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

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

[Bite Size: Meeting the Child and Adult Care Food Program \(CACFP\) Meal Patterns Module 5: Milk Component](#) (“Bite Size Meal Pattern Training” section of CSDE’s Meal Patterns for the Child and Adult Care Food Program webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-for-the-child-and-adult-care-food-program/bite-size-meal-pattern-training>

[CACFP Adult Meal Patterns](#) (CSDE’s Meal Patterns for the Child and Adult Care Food Program webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-for-the-child-and-adult-care-food-program#AdultMealPatterns>

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[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 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

[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 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>

[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>

[Serving Milk in the CACFP](#) (USDA):

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

[Summary Charts of the Requirements for Meal Modifications in CACFP Adult Day Care Centers](#) (CSDE):

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

[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>

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[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)

<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)

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

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/milk_substitutes_cacfp_adults.pdf.



Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the CACFP

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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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