

Determining if Nondairy Beverages Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in School Nutrition Programs

This document indicates how to determine if nondairy beverages credit as milk substitutes in the U.S. Department of Agriculture's (USDA) meal patterns for grades K-12 and preschoolers (ages 1-4) in the [National School Lunch Program \(NSLP\)](#), [School Breakfast Program \(SBP\)](#), [Seamless Summer Option \(SSO\)](#) of the NSLP, and [Afterschool Snack Program \(ASP\)](#) of the NSLP.



To credit in the school meal patterns, nondairy milk substitutes for children without a disability must meet the USDA's nutrition standards for fluid milk substitutes ([7 CFR 210.10\(d\)\(3\)](#)). Nondairy beverages that do not meet these requirements cannot be served in reimbursable meals and ASP snacks unless the child has a medically documented disability that specifically requires this substitution.

Instructions: Use the chart on page 2 to enter the product's information in column 3, then complete column 4 to determine if the nondairy 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. These nutrients and amounts are defined in [7 CFR 210.10\(d\)\(3\)](#).
- **Column 2** indicates the unrounded and rounded percent 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](#). 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 3:** 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 school food authority (SFA) must obtain this information from the manufacturer.
- **Column 4:** Check "yes" or "no" to indicate if the product meets each nutrient standard (either the nutrients per cup in column 1 or the unrounded or rounded % DV in column 2). If all "yes" boxes are checked, the product is an allowable nondairy milk substitute. Submit information to the CSDE so compliant products may be added to the list of allowable products (refer to list 17 of the CSDE's [List of Acceptable Foods and Beverages](#)).

Additional requirements: In addition to meeting the USDA's nutrition standards for fluid milk substitutes, nondairy milk substitutes must also comply with the applicable requirements below.

- Nondairy milk substitutes for preschoolers must be unflavored.

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- Nondairy milk substitutes sold in public schools must meet the state beverage requirements of [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 nondairy milk substitute, the product must meet each nutrient standard (either the nutrients per cup in column 1 or the unrounded or rounded % DV in column 2). Check that the product also meets the additional requirements for preschoolers and public schools indicated above.

Comparison of a nondairy milk substitute product with the USDA's nutrition standards				
Column 1	Column 2		Column 3	Column 4
USDA requirements: Minimum nutrients per cup (8 fluid ounces)	Percent DV (% DV)		Product information ³	Meets nutrient standard in column 1 or 2
	Unrounded ¹	Rounded ²		
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: 500 international units (IU) or 150 micrograms (mcg) retinol activity equivalent (RAE) ⁴	16.67%	20%		<input type="checkbox"/> Yes <input type="checkbox"/> No
Vitamin D: 100 IU or 2.5 micrograms (mcg) ⁴	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
<p>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).</p> <p>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).</p> <p>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.</p> <p>⁴ 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.</p>				

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Written Parent/Guardian Request Required for Nondairy Milk Substitute

Allowable nondairy milk substitutes 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. Schools and institutions must maintain requests for nondairy milk substitutes on file with children's medical records. For detailed guidance on the USDA's requirements for milk substitutes, refer to the CSDE's *Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs*.

Resources

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

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

Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Milk_Substitutes_SNP.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>

Final Rule: Fluid Milk Substitutions in the School Nutrition Programs (73 FR 52903):

<https://www.fns.usda.gov/cn/fr-091208>

Guide to Meal Modifications in School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Special_Diets_Guide_SNP.pdf

List 17 Beverages – Dairy Alternatives (CSDE's List of Acceptable Foods and Beverages webpage):

<https://portal.ct.gov/-/media/SDE/Nutrition/HFC/FBlist/AcceptableFoodsList17.pdf>

Milk Substitutes in School Nutrition Programs (CSDE's Special Diets in School Nutrition Programs webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-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>

Special Diets in School Nutrition Programs (CSDE webpage):

<http://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs>

USDA Memo SP 02-2009: Final Fluid Milk Substitution Rule:

<https://www.fns.usda.gov/final-fluid-milk-substitution-rule>

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>

USDA NSLP Regulations 7 CFR 210.10(d)(3)) Fluid milk substitutes:

[https://www.ecfr.gov/current/title-7/part-210#p-210.10\(d\)\(3\)](https://www.ecfr.gov/current/title-7/part-210#p-210.10(d)(3))

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For more information, visit the Connecticut State Department of Education's (CSDE) [Special Diets in School Nutrition Programs](#) webpage or contact the [school nutrition programs 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/NSLP/SpecDiet/Determining_Allowable_Nondairy_Milk_Substitutes_SNP.pdf.

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Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
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