

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

Child care centers, Head Start centers, at-risk afterschool care centers, emergency shelters, and family day care homes that participate in the Child and Adult Care Food Program (CACFP) must follow the U.S. Department of Agriculture's (USDA) requirements for milk substitutes for children without disabilities. These requirements apply only to meal accommodations for children without disabilities who cannot drink milk.

CACFP facilities have the option to make this accommodation by offering one or more allowable fluid milk substitutes for children without disabilities. These substitutes are at the expense of the CACFP facility. If the CACFP facility chooses to make allowable milk substitutes available, they must be available for all children when requested by their parent or guardian.

Note: The following criteria apply only to milk substitutes for children without disabilities. Dietary accommodations for children with disabilities must follow the USDA's requirements. For more information, see the Connecticut State Department of Education's (CSDE) guide, *Accommodating Special Diets in CACFP Child Care Programs*.

Allowable Fluid Milk Substitutes

CACFP facilities can choose to offer one or more allowable fluid milk substitutes, including:

- **lactose-free or lactose-reduced milk that meets the appropriate fat content for each age group** (i.e., unflavored whole milk for age 1; unflavored low-fat (1%) milk or unflavored fat-free milk for ages 2-5; and unflavored low-fat (1%) milk, unflavored fat-free milk, or flavored fat-free milk for ages 6-12); and
- **nondairy milk substitutes** that meet the USDA's nutrition standards for fluid milk substitutes (see table 1), such as certain brands of soy milk. For more information, see "USDA's Nutrition Standards for Milk Substitutes" on page 2.

The USDA recommends that lactose-free or lactose-reduced milk is the first choice for children with lactose intolerance.

CACFP facilities may choose to offer only one milk substitute such as lactose-free milk. If a child or family decides not to take this option, the CACFP facility is not obligated to offer any other milk substitutes. CACFP facilities may also choose (but are not required) to offer a second option of a nondairy beverage that meets the USDA's nutrition standards for milk substitutes



Juice and Water Substitutes

CACFP facilities can never offer juice or water as milk substitutes for children without disabilities, even with a medical statement signed by a recognized medical authority. If CACFP facilities chooses to make milk substitutes available, they must include either lactose-free or lactose-reduced milk that is the appropriate fat content for each age group, or a nondairy beverage that meets the USDA’s nutrition standards for milk substitutes (see table 1). These are the only two options allowed by the USDA as milk substitutes for children without disabilities in the CACFP.

Required Documentation

Milk substitutes for children without disabilities do not require a medical statement from a recognized medical authority. Parents or guardians may request a nondairy milk substitute in writing. The written request from the parent or guardian must identify the medical or other special dietary need that restricts the child’s diet and requires the substitution.

The provision allowing a written request from a parent or guardian applies only to milk substitutes for children without disabilities. It does not apply to any other substitutions of foods or beverages in CACFP meals for children without disabilities. For information on meal accommodations for children without disabilities, see the CSDE’s guide, *Accommodating Special Diets in CACFP Child Care Programs*.

USDA’s Nutrition Standards for Milk Substitutes

CACFP facilities that choose to offer a nondairy milk substitute as part of reimbursable meals for children without disabilities must use products that meet the USDA’s nutrition standards for fluid milk substitutes (see table 1). Nondairy milk substitutes that do not meet these nutrition standards cannot be served in reimbursable meals and snacks for children without disabilities, even if the child’s family provides a medical statement signed by a recognized medical authority.



Allowable Milk Substitutes for Children without Disabilities in the CACFP

Table 1 summarizes the USDA's nutrition standards for fluid milk substitutes.

Table 1. USDA's nutrition standards for fluid milk substitutes	
Minimum nutrients per cup (8 fluid ounces)	
Calcium	276 milligrams (mg) or 30% Daily Value (DV) ¹
Protein	8 grams (g)
Vitamin A	500 international units (IU) or 10% DV
Vitamin D	100 IU or 25% DV
Magnesium	24 mg or 6% DV
Phosphorus	222 mg or 20% DV ¹
Potassium	349 mg or 10% DV ¹
Riboflavin	0.44 mg or 25% DV ¹
Vitamin B-12	1.1 micrograms (mcg) or 20% DV ¹
¹ The FDA labeling laws require manufacturers to round nutrition values to the nearest 5 percent. The unrounded minimum DV is 27.6% for calcium, 22.2% for phosphorus, 9.97% for potassium, 25.88% for riboflavin, and 18.33% for vitamin B12. Source: <i>How to Determine if a Soy-Based Beverage Meets the Nutrient Requirements to Qualify as an Authorized Milk Substitute in WIC</i> , USDA Food and Nutrition Services (FNS) Office of Research, Nutrition, and Analysis (ORNA), 2006.	

Nondairy milk substitutes must be unflavored for ages 1-5. Flavored nondairy milk substitutes may be served to ages 6 and older, but the USDA's *CACFP Best Practices* recommends serving only unflavored nondairy milk substitutes.

Allowable Milk Substitutes for Children without Disabilities in the CACFP

Acceptable Milk Substitute Products

Certain brands of soy milk are the only currently available nondairy milk products that meet the USDA's nutrition standards for fluid milk substitutes. Table 2 provides a list of allowable milk substitute products. Nondairy milk substitutes must be unflavored for ages 1-5. This list is for informational purposes and does not imply endorsement by the CSDE or the USDA.

Table 2. Milk substitutes meeting the USDA's nutrition standards			
Unflavored milk substitutes (allowed for ages 1 and older)			
Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Original, aseptic package	8.25	UPC 0-41390-06183-7; Case (24 count) UPC 100-41390-06183-4
Kirkland Signature	Organic Soymilk, Plain	64	0-96619-49000-4
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	8	0-52603-08311-9
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Plain, aseptic package	32	0-52603-08200-6
Stremick's Heritage Foods	8th Continent Soymilk, Original, refrigerated	64	0-53859-07066-3
Sunrich Naturals	Soymilk, Original, aseptic package ¹	8	7-82758-33108-6
Sunrich Naturals	Soymilk, Original, aseptic package ¹	32	7-82758-33232-8
Walmart	Great Value Soymilk, Original, paper carton ¹	32	0-78742-09387-1
<p>¹ These beverages exceed the fat limit for nondairy beverages specified by Section 10-221q of the Connecticut General Statutes. They cannot be served in child care programs located in public schools.</p>			

Allowable Milk Substitutes for Children without Disabilities in the CACFP

Table 2. Milk substitutes meeting the USDA’s nutrition standards, continued

Flavored milk substitutes (allowed only for ages 6 and older) ^{1, 2}

Manufacturer	Product	Container size (fluid ounces)	Container UPC code
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8	UPC 0-41390- 06185-1; Case (24 count) UPC 100- 41390-06185-8
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8	UPC 0-41390- 06184-4; Case (24 count) UPC 100- 41390-06184-1
Pacific Natural Foods	Ultra Soy All Natural Nondairy Beverage, Vanilla, aseptic package	32	0-52603-08225-9
Stremick's Heritage Foods	8th Continent Soymilk, Vanilla, refrigerated	64	0-53859-07067-0
Sunrich Naturals	Soymilk, Unsweetened Vanilla, aseptic package ¹	32	7-82758-33932-7
Sunrich Naturals	Soymilk, Vanilla, aseptic package	32	7-82758-33132-1
Sunrich Naturals	Soymilk, Vanilla, aseptic package	8	7-82758-33208-3

¹ These beverages exceed the fat limit for nondairy beverages specified by [Section 10-221q](#) of the Connecticut General Statutes. They cannot be served in child care programs located in public schools.

² Flavored nondairy milk substitutes may be served to ages 6 and older, but the USDA’s *CACFP Best Practices* recommends serving only unflavored milk substitutes.

Allowable Milk Substitutes for Children without Disabilities in the CACFP

For milk substitutes not listed, CACFP facilities must obtain nutrition information from the manufacturer to document that a product contains the required amount of each nutrient in the USDA's nutrition standards for milk substitutes (see table 1). The Nutrition Facts label might not include all of the nutrients required to identify a product's compliance with the USDA nutrition standards. For assistance with evaluating products for compliance, please contact the CSDE.

Resources

Accommodating Special Diets in CACFP Child Care Programs (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/NPGspdiet.pdf>

CACFP Best Practices (USDA):

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

CACFP Meal Patterns for Children (USDA):

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/CACFPmealpattern.pdf>

Final Rule: Child and Adult Care Food Program: Meal Pattern Revisions Related to the Healthy, Hunger-Free Kids Act of 2010 (81 FR 24348):

<https://www.gpo.gov/fdsys/pkg/FR-2016-04-25/pdf/2016-09412.pdf>

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

<https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/CACFPspecialDietsPresentation.pdf>

Serving Milk in the CACFP (USDA):

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

Allowable Milk Substitutes for Children without Disabilities in the CACFP



For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage or contact the [CACFP staff](#) in the CSDE's Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This handout is available at <https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/CACFPmilksub.pdf>.

In accordance with Federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, the USDA, its Agencies, offices, and employees, and institutions participating in or administering USDA programs are prohibited from discriminating based on race, color, national origin, sex, disability, age, or reprisal or retaliation for prior civil rights activity in any program or activity conducted or funded by USDA.

Persons with disabilities who require alternative means of communication for program information (e.g. Braille, large print, audiotape, American Sign Language, etc.), should contact the Agency (State or local) where they applied for benefits. Individuals who are deaf, hard of hearing or have speech disabilities may contact USDA through the Federal Relay Service at (800) 877-8339. Additionally, program information may be made available in languages other than English.

To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

This institution is an equal opportunity provider.

The Connecticut State Department of Education is committed to a policy of equal opportunity/affirmative action for all qualified persons. The Connecticut Department of Education does not discriminate in any employment practice, education program, or educational activity on the basis of age, ancestry, color, criminal record (in state employment and licensing), gender identity or expression, genetic information, intellectual disability, learning disability, marital status, mental disability (past or present), national origin, physical disability (including blindness), race, religious creed, retaliation for previously opposed discrimination or coercion, sex (pregnancy or sexual harassment), sexual orientation, veteran status or workplace hazards to reproductive systems, unless there is a bona fide occupational qualification excluding persons in any of the aforementioned protected classes.

Inquiries regarding the Connecticut State Department of Education's nondiscrimination policies should be directed to: Levy Gillespie, Equal Employment Opportunity Director/Americans with Disabilities Coordinator (ADA), Connecticut State Department of Education, 450 Columbus Boulevard, Suite 607, Hartford, CT 06103, 860-807-2071, levy.gillespie@ct.gov.