

Illinois State Board of Education
Nutrition Department
Child and Adult Care Food Program

Allowable Milk Substitutions for Children Without Disabilities in the Child and Adult Food Care Program

Fluid milk served in Child and Adult Care Food Program (CACFP) must follow the federal requirements for milk substitutions for children without disabilities. These requirements apply only to meal accommodations for children without disabilities who cannot drink cow's milk.

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

The following criteria apply only to milk substitutes for children without disabilities. Dietary accommodations for children with disabilities must follow the requirements as specified by the U.S. Department of Agriculture (USDA). See [Accommodating Children with Disabilities in the School Meal Programs](#).

Fluid Milk Basics

Ages and Milk Requirements

- Age 1 year:
 - Unflavored whole milk
- Ages 2-5 years:
 - Unflavored low-fat milk (1%)
 - Unflavored fat-free milk (skim)
- Ages 6 years and older, and adults
 - Unflavored low-fat milk (1%)
 - Unflavored fat-free milk (skim)
 - Flavored fat-free milk (skim)

Requirements

- Milk served to 1-year-old children must be unflavored whole milk.
- For a period of one month, when children are 12 to 13 months of age, meals that contain infant formula may be reimbursed to facilitate the weaning from infant formula to cow's milk. While weaning, infants should be presented with both types of foods at the same meal service to gradually encourage acceptance of the new food.
- Flavored milk, including flavored non-dairy beverages and flavored straws, cannot be served to children 1 through 5 years old.
- Fat-free flavored milk may be served to children 6 years and older. Flavored milk may be commercially prepared or flavored with syrup or flavored milk powders (including flavored straws) using fat-free milk.

- Low fat (1%) flavored milk may be served to children 6 years and older and adults. Flavored milk may be commercially prepared or flavored with syrup or flavored milk powders (including flavored straws) using low-fat milk.

Non-dairy Milk Substitute

- If children cannot consume fluid cow’s milk due to medical or other special dietary needs other than a disability, non-dairy beverages may be served in place of fluid cow’s milk.
- Non-dairy milk substitutes that are nutritionally equivalent to cow’s milk may be served to children or adults with special dietary needs.
- Non-dairy milk substitutes must meet the nutritional standards found in cow’s milk as outlined in [7 CFR 226.20\(g\)\(3\)](#).

USDA Minimum Nutrients per Cup (8 fl oz) for Milk Substitutes	
Nutrient	Nutrient Values
Calcium	276 mg
Protein	8 g
Vitamin A	500 IU or 150 mcg
Vitamin D	100 IU or 2.5 mcg
Magnesium	24 mg
Phosphorus	222 mg
Potassium	349 mg
Riboflavin	0.44 mg
Vitamin B-12	1.1 mcg
g=grams; mg=milligrams; mcg=micrograms; IU=international unit	

- Parents or guardians may request in writing that a non-dairy milk substitute *that meets the above nutrition standards* be served in place of cow’s milk.
- A medical statement signed by a state-recognized medical authority is only required for non-dairy substitutions due to a disability that does *not* meet the nutritional standards of cow’s milk as described in 7 CFR 22.6.20(g)(3). Refer to the [Medical Authority Modified Meal Request Form](#) for additional information.

Required Documentation

Milk substitutions for children without disabilities do not require a medical statement from a recognized medical authority. Parents or guardians may request a non-dairy 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 statement from a parent or guardian applies only to milk substitutions for children without disabilities. Any other meal variations for children without disabilities require written documentation on a medical statement from a recognized medical authority. For more information, see the ISBE

[Accommodating Children With Special Dietary Needs webpage.](#)

Allowable Fluid Milk Substitutes

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

- **Lactose-free or lactose-reduced milk** that is low-fat (1%) or fat-free (skim); and
- **Allowable non-dairy beverages**, such as soy milk, that meet the USDA nutrition standards for milk substitutes.

The USDA recommends that lactose-free or lactose-reduced milk is the first choice for children with lactose intolerance. Lactose-free and lactose-reduced milk must be low-fat (1%) or fat-free (skim) for children ages 2 and older and must be whole milk for ages 12 through 23 months. ISBE encourages CACFP facilities to use only unflavored products for children 6 years and older. This is consistent with the USDA's recommendation to serve only plain milk in the CACFP.

It is at the discretion of the daycare to provide a non-dairy milk substitute if it is not related to a disability. However, the USDA Food and Nutrition Service strongly encourages centers and day care homes to make meal modifications to accommodate participants' non-disability special dietary needs.

CACFP facilities **cannot** serve juice or water as fluid milk substitutions for children without disabilities. If a CACFP facility chooses to make milk substitutions available, they can only include either lactose-free or lactose-reduced milk, or a nondairy beverage that meets the USDA nutrition standards for milk substitutes. These are the **only** options allowed for milk substitutions that are not related to a disability.

Acceptable Milk Substitute Products

CACFP facilities must obtain nutrition information from the manufacturer to document that a product contains the required amount of each nutrient in the USDA nutrition standards for milk substitutions (see chart on previous page). The Nutrition Facts label might not include all of the nutrients required to identify a product's compliance with the USDA nutrition standards. Please contact ISBE at CNP@isbe.net or 217-782-2491 if you have questions about evaluating products for compliance.

Non-Dairy Milk Substitutes Meeting USDA Substitution Criteria

The lists below are for informational purposes only and do not imply endorsement by ISBE or the USDA. CACFP facilities remain responsible for obtaining the nutrition information to document that a product meets the requirements of the USDA nutrition standards for milk substitutions.

Milk Substitutes Meeting the USDA Nutrition Standards

Unflavored Milk Substitutes

Manufacturer	Product Name	Container Size (Fl Oz)
West Life	West Life Organic Plain Soy Milk with Calcium and Vitamin D	32 or 64 oz
Silk	Silk Original Soymilk	Quart, half gallon, twin pack, or three pack
Silk	Silk Kids Oatmilk Blend (pea and oatmilk blend)	59 fl oz
Stremicks Heritage Foods	8 th Continent Original Soymilk	Half gallon or 8 oz carton
Kikkoman	Pearl Organic Soymilk-Smart Original	8.25 oz boxes (24/case)
Walmart	Great Value Original Soymilk	64 oz carton
Campbell's Foodservice	Pacific Foods Ultra Soy Original Plant-based Beverage	32 fl oz
Ripple Foods	Ripple Dairy-free Milk, Original, aseptic package	Shelf Stable 8 OZ & 32 OZ Plant Based Milks

Flavored Milk Substitutes Meeting the USDA Nutrition Standards

Flavored Milk Substitutes (only for children aged 6 and older)

Product Name	Manufacturer	Container Size (Fl Oz)
Kikkoman	Pearl Organic Soymilk, Smart Chocolate, aseptic package	8 oz
Kikkoman	Pearl Organic Soymilk, Smart Creamy Vanilla, aseptic package	8 oz
West Life	West Life Organic Vanilla Soymilk with Calcium and Vitamin D	32 oz
Ripple Foods	Ripple Dairy-Free Milk, Vanilla, aseptic package	8 oz or 32 oz
Ripple Foods	Ripple Dairy-Free Milk, Chocolate, aseptic package	8 oz or 32 oz
Stremicks Heritage Foods	8th Continent Soymilk, Vanilla, refrigerated	64 oz
Silk	Shelf-Stable Chocolate Soymilk	8 oz
Silk	Shelf-Stable Vanilla Soymilk	8 oz