

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 Care Food Program (CACFP)**

Fluid milk served in the 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 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. 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 U.S. Department of Agriculture (USDA) requirements specified in the Illinois State Board of Education's (ISBE) [Accommodating Children With Special Dietary Needs](#).**

**Fluid Milk Basics**

Ages and Milk Requirements

- Age 12 months through 23 months:
  - 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)
  - Flavored low fat (1%)

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, and adults. Flavored milk may be commercially prepared or flavored using syrup or flavored milk powders (included 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 using syrup or flavored milk powders (included flavored straws) using low-fat milk.

**Non-Dairy Milk Substitute**

- If children cannot consume fluid milk due to medical or other special dietary needs, other than a disability, non-dairy beverages may be served in place of fluid 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 beverages must meet the nutritional standards found in cow’s milk as outlined in 7 CFR 226.20(g)(3).

<b>Minimum Nutrients per Cup (8 fluid ounces)</b>	
<b>Nutrient</b>	<b>Nutrient Values</b>
Calcium	276 MG
Protein	8 g
Vitamin A	500 IU
Vitamin D	100 IU
Magnesium	24 mg
Phosphorus	222 mg
Potassium	349 mg
Riboflavin	.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 nutrition standards be served in place of milk.
- A medical statement signed by a state recognized medical authority is only required for non-dairy substitutions due to a disability that do not meet the nutritional standards of cow’s milk as described in 7 CFR 22.6.20(g)(3). Download 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 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 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 ISBE’s [Accommodating Children with Special Dietary Needs](#).

**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 nondairy 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. This is consistent with the USDA final rule’s recommendation to serve only plain milk in the CACFP.

It is at the centers or day care home’s discretion to provide a non-dairy milk substitute if it is not related to a disability. However, FNS 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.

**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 above). The Nutrition Facts label might not include all the nutrients required to identify a product’s compliance with the USDA nutrition standards. For assistance with evaluating products for compliance, please contact ISBE.

**Non-Dairy Beverages Meeting USDA Substitution Criteria**

**The list below may be used for informational purposes only. 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.**

Product Name	WESTSOY OrganicPlus Plain & Vanilla Soymilk	Sunrich Naturals Plain, Original, Unsweetened or Vanilla Soymilk	Silk Original Soymilk	8 <sup>th</sup> Continent Original or Vanilla Soymilk	Pearl Organic Soymilk-Smart Original, Smart Creamy Vanilla or Smart Chocolate	Great Value Original Soymilk	Ripple ‘ON-THE-GO’ Dairy-Free Shelf-Stable Plant-Based Milk
Possible Vendors	Wholesale Food Suppliers	Wholesale Food Suppliers	Retail Grocer	Retail Grocer	Wholesale Food Suppliers	Retail Grocer	Retail Grocer
Container Size	32 oz or 64 oz	8 oz or 32 oz carton	Quart, half gallon, twin pack, or three pack	Half gallon or 8ozcarton	8.25 oz boxes (24/case)	64 oz carton	8 ounce “on-the-go” cartons  <small>*(Ripple 48oz. refrigerated container is <i>not</i> equivalent and is <i>not</i> approved)</small>
Shelf Stable	No	Yes	No	No	Yes, 1 year unopened	No	Yes
Storage Type	Refrigerate	12-month shelf life	Refrigerate	Refrigerate, use in 7-10 days	Refrigerate after opening	Refrigerate	Refrigerate after opening