

Substituting Milk in the CACFP



Fluid milk is a required component in the Child and Adult Care Food Program (CACFP) meal pattern. But what do you do if you have a participant who cannot have fluid milk as required?

The Basics

- A **written request** by the parent, guardian, adult participant, or person on behalf of an adult participant must be provided for a milk substitute.
- A milk substitute must be **nutritionally equivalent** to fluid milk in order to be reimbursed in the CACFP.
- If a milk substitute is not nutritionally equivalent, then a **medical statement written by a licensed healthcare professional** is required in order for the meal to be reimbursed.
- Children 1-5 years old must be served unflavored milk substitutes.

Could You Serve These Substitutes?

Compare the nutrition profiles to fluid milk to determine if you can serve them without a medical statement.

Nutrition Facts	
About 8 servings per container	
Serving size 1 cup (240 mL)	
Amount per serving	
Calories	110
% Daily Value*	
Total Fat 4.5 g	6%
Saturated Fat 0.5 g	3%
Trans Fat 0g	
Cholesterol 0 mg	0%
Sodium 90 mg	4%
Total Carbohydrate 9g	3%
Dietary Fiber 2g	7%
Total Sugars 6g	
Includes 5g Added Sugars	10%
Protein 8g	16%
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Vitamin D 3 mcg	Calcium 450 mg
Iron 1.3 mg	Potassium 380 mg
Vitamin A 150 mcg	Riboflavin .5 mg
Folate 40 mcg	Vitamin B ₁₂ 3 mcg
Phosphorus 220 mg	Magnesium 50 mg

This substitute **meets or exceeds** all nutrients on milk's profile. The meal can be reimbursed without a medical statement.

Nutrition Facts	
About 6 servings per container	
Serving size 1 cup (240 mL)	
Amount per serving	
Calories	90
% Daily Value*	
Total Fat 1.5 g	2%
Saturated Fat 0 g	0%
Trans Fat 0g	
Cholesterol 0 mg	0%
Sodium 120 mg	5%
Total Carbohydrate 19g	7%
Dietary Fiber 2g	8%
Total Sugars 4g	
Includes 0g Added Sugars	0%
Protein 2g	4%
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Vitamin D 4 mcg	Calcium 350 mg
Iron 0.3 mg	Potassium 400 mg
Vitamin A 180 mcg	Riboflavin .1 mg
Folate 20 mcg	Vitamin B ₁₂ 2 mcg
Phosphorus 270 mg	Magnesium 30 mg

This substitute **does not meet** the profile in protein or riboflavin. It would require a medical statement for meal reimbursement.

Nutrition Profile of Fluid Milk

Nutrient	Per cup (8 fl oz)
Calcium	276 mg
Protein	8 g
Vitamin A	500 IU (150 mcg)
Vitamin D	100 IU (2.5 mcg)
Magnesium	24 mg
Phosphorus	222 mg
Potassium	349 mg
Riboflavin	.44 mg
Vitamin B ₁₂	1.1 mcg

Things to Remember

- A home or center is not required to provide a milk substitute if it is not related to a disability.
- Providers do not receive additional meal reimbursements if they must provide a milk substitution. They also may not require a parent or guardian to pay the difference between fluid milk and the substitute.
- A parent or guardian may provide a milk substitute only if it is nutritionally equivalent, which the provider may serve to the participant and claim reimbursement for the meal.
- Milk substitutes are not required to be low-fat or fat-free when served to participants 2 years and older.
- Medical statements are required to accommodate requests for a higher-fat fluid milk for participants 2 years and older.

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Frequently Asked Questions

If a child has a food allergy with a medical statement, does that mean they have a disability?

Yes, allergies are considered disabilities under the Americans with Disabilities Act. CACFP providers are required to provide substitutions for participants with disabilities.

Is almond milk nutritionally equivalent to fluid milk?

Most commercial almond beverages are not nutritionally equivalent to fluid milk, and therefore not reimbursable in the CACFP. If a milk substitute is not nutritionally equivalent, then a medical statement written by a licensed healthcare professional for that participant is required for it to be reimbursable in the CACFP.

The participant is allergic to cow's milk, but not soy milk, and they have a medical statement for almond milk. Do I have to provide the almond milk?

If the only milk substitute listed on the medical statement is almond milk, then yes, you must provide the almond milk.

If I receive a written note from a parent that their 4-year-old child cannot have fluid milk and requires an oat milk substitute, what should I do?

This could be a preference or a disability, so it is important to connect with the parent and discuss which case this is. Then, see if there is an oat milk that is nutritionally equivalent to fluid milk. If you do find one that is nutritionally equivalent, the parent note is enough to keep on file along with the oat milk food label. If you cannot find one that is nutritionally equivalent, then a medical statement written by a licensed healthcare professional is required in order for it to be reimbursable in the CACFP meal pattern.

If you have a medical statement for a milk allergy, and the statement says to only serve water, would the meal be creditable?

If the medical statement only indicates that water can be served and no milk substitute is given, then yes, you are required to serve the water and the meal will be 100% reimbursable.

Can I serve vanilla-flavored pea milk to 3-5 year olds if it is nutritionally equivalent to fluid milk?

No, you cannot serve any flavored milk substitutes unless indicated in a medical statement written by a licensed healthcare professional - because it is a flavored milk substitute. Milk substitutes must be both nutritionally equivalent to fluid milk and also unflavored when serving 3-5-year-old children. Additionally, an unflavored milk substitute that is nutritionally equivalent to fluid milk for this age group requires a written note from a parent to serve this milk substitute.

Can homemade flavored milk be added to unflavored fluid milk and still be creditable?

It depends on what age you are serving. If you are serving children that are 6 years and older, then yes, this is creditable in the CACFP. You can flavor fat-free or low-fat milk by adding flavored straws, syrups and powders to unflavored milk. Flavored milk is not part of a reimbursable meal or snack for children 5 years old and younger; they must be served unflavored milk.

