

Dairy Requirements in Senior Nutrition Programs

Dairy Questions and Answers Overview

Does the senior nutrition program require milk?

No. The Title III-C senior nutrition program requires that meals meet the nutritional needs of older adults as outlined in the Dietary Guidelines for Americans (DGAs) and Dietary Reference Intakes (DRIs).

Both sets of standards are designed to promote health and decrease the risk of disease. Dairy intake is encouraged to help older adults meet calcium and vitamin D needs, which are critical for bone health and fall prevention.

One of the most common sources of calcium is milk, and many state nutrition policies require serving liquid milk (e.g., lactose-free and ultra-high temperature milk, etc.). However, other sources of calcium may be considered in place of liquid milk.

Does an older adult have to take milk if they do not want it?

No. The senior nutrition program is an offer-versus-serve program. This means that a program is required to offer food or beverages, such as milk, but someone can refuse them. A refusal does not determine whether a program can receive funding for the meal.

Does fruit or salad count as a milk alternative?

No. The program can use alternatives that provide nutrients similar to those in milk. Salads, vegetables, and fruits generally do not have the same nutrients as milk. Toward the end of this document is a list of alternatives to milk for use in senior nutrition programs. The program's nutrition expert should keep in mind that some milk alternatives may be high-cost and adjust accordingly.

Does milk have to be delivered as fresh and cold?

No. The senior nutrition program allows milk served in congregate and home-delivered meals to be powdered and shelf-stable in situations involving long meal routes, deliveries, supply chain issues, and emergencies. Please see local state policies regarding milk substitutions.

Does my program have to accommodate someone's preference?

It depends. Programs should provide meals, to the maximum extent practicable, that are adjusted to meet any special dietary needs of program participants. This may include meals adjusted for regional considerations and preferences, as well as medically tailored meals (OAA, Title III Section 339). Nutrition providers are not federally required to provide special diets that are not feasible with limited resources or

expertise to provide them safely. Nutrition programs are encouraged to work with local hospitals, restaurants, and other food service providers to supply medical and specific dietary preferences. Religious, regional, or traditional dietary practices may be provided if food and preparations are available and they meet the nutritional needs of older adults as outlined in the DGAs and DRIs. Please see local state policies regarding accommodation requirements.

Is lactose intolerance or difficulty in digesting milk and milk products common?

Yes, in some regions of the world, lactose intolerance or difficulty in digesting milk and milk products is common. It is estimated that about 36% of people in the U.S. have lactose malabsorption.

Lactose intolerance is a condition in which one may have digestive symptoms after consuming foods or drinks that contain lactose. Lactose malabsorption is a condition in which one cannot digest, or break down, all the lactose that has been consumed. While lactose malabsorption causes lactose intolerance, not all people with lactose malabsorption have lactose intolerance. Risk factors for lactose intolerance include age, ethnicity, diseases of the small intestine (e.g., celiac), and medical treatments (e.g., cancer). Lactose intolerance and malabsorption are very common conditions, and their prevalence increases with age. The most at-risk populations are people of African, Asian, American Indian, and Hispanic descent.

Some people who are lactose intolerant may be able to tolerate small amounts of milk over the course of a day, such as in coffee. Others may be able to tolerate lactose-free dairy products, yogurt, or cheese, particularly aged cheddar or Swiss cheese, rather than younger cheeses, such as Colby. This varies by individual.

For individuals who are lactose intolerant, lactose-free whole milk, plain full-fat yogurt, and aged cheese (e.g., cheddar or Swiss) are common substitutes. However, some individuals may not tolerate any dairy products. For those individuals, other food substitutes, often fortified with calcium, are listed in the milk alternatives table below. Individuals who are vegan and consume no meat, fish, eggs, or dairy products may substitute calcium-fortified products. Note the DGAs caution that vegan diets may require careful planning and supplementation to avoid gaps in calcium, vitamin D, vitamin B12, and other key nutrients.

Menu Planning Tips

- The DGAs recommend milk, plain yogurt, and natural cheeses.
- Try to incorporate dairy several times a week and a milk alternative, such as cheese or plain yogurt, about once a week.
- Select dairy products that are good sources of calcium (see list below). Note that some dairy products are not good sources of calcium, even though they are in the dairy category. These include butter, cream, cream cheese, sour cream, cottage cheese, ice cream, and frozen desserts. It is recommended that these sources not be counted toward dairy/calcium goals.
- The DGAs recommend a limit of no more than 10 grams of added sugars per meal. Many flavored milks (e.g., chocolate or strawberry) may exceed this limit — check labels carefully. The naturally occurring sugar in plain milk does not count toward the added sugars limit.

- Calcium fortified orange juice may have added sugar (20+ grams) or be too high in natural sugars for some populations. Milk substitutes made from nuts or grains (e.g., almond milk, oat milk, soy milk, etc.) may contain little or no calcium or protein. Check labels, as calcium content varies widely.
- Policies requiring nutrient analysis rather than meal patterns can be considered and may allow for maximum flexibility since this approach may not require specific meal components.
- Consider the participant population you are serving when choosing dairy and non-dairy products.

Nutrition Education

- Calcium is an important mineral that the body needs as it ages. Older adults often do not consume adequate amounts of calcium, and their ability to absorb it also decreases with age. Encouraging older adults to increase their calcium intake — primarily through whole, minimally processed dairy foods — can help keep bones and teeth healthy and improve the way muscles, nerves, and hormones function.
- The nutrient recommendations in this tip sheet are based on general guidelines for older adults. Individual needs may vary depending on health conditions, medications, and other personal factors. Participants should consult with their doctor or a registered dietitian to determine the nutrient intake that is right for them.
- Visit the Nutrition and Aging Resource Center for more resources on [Nutrition Education](#) and [Nutrition Guidelines](#).

Milk Alternatives

The following table provides substitutions for 8 ounces (1 cup) of milk. It also includes a variety of other foods that can be incorporated into menus and meals.

Dairy and Fortified Soy Alternatives	Serving Size	Calories	Calcium (mg)
Yogurt, plain, whole milk (full fat)	8 ounces	~150	~275
Yogurt, plain, nonfat	8 ounces	~137	488
Yogurt, plain, low fat	8 ounces	154	448
Kefir, plain, whole milk (full fat)	1 cup	~160	~317
Kefir, plain, low fat	1 cup	104	317
Milk, whole, plain	1 cup	150	300
Milk, 1 % - 2% plain	1 cup	102	305
Milk, skim, plain	1 cup	83	298

Soy beverage (soy milk), unsweetened	1 cup	80	301
Yogurt, soy, plain	8 ounces	150	300
Buttermilk, low fat	1 cup	98	284
Yogurt, Greek, plain, whole milk (full fat)	8 ounces	~190	~250
Yogurt, Greek, plain, low fat	8 ounces	166	261
Yogurt, Greek, plain, nonfat	8 ounces	134	250
Cheese, natural (e.g., cheddar, Swiss)	1 ½ ounces	~155-170	~300-450
Cheese, reduced, low, or fat free (various)	1 ½ ounces	~55-155	~85-485
Vegetables	Serving Size	Calories	Calcium (mg)
Lamb's quarters, cooked	1 cup	58	464
Nettles, cooked	1 cup	37	428
Mustard spinach, cooked	1 cup	29	284
Amaranth leaves, cooked	1 cup	28	276
Collard greens, cooked	1 cup	63	268
Spinach, cooked	1 cup	41	245
Nopales, cooked	1 cup	22	244
Taro root (dasheen or yautia), cooked	1 cup	60	204
Turnip greens, cooked	1 cup	29	197
Bok choy, cooked	1 cup	24	185
Jute, cooked	1 cup	32	184
Kale, cooked	1 cup	43	177
Mustard greens, cooked	1 cup	36	165
Beet greens, cooked	1 cup	39	164
Pak choi, cooked	1 cup	20	158
Dandelion greens, cooked	1 cup	35	147

Protein	Serving Size	Calories	Calcium (mg)
Tofu, raw, regular, prepared with calcium sulfate	1/2 cup	94	434
Sardines, canned	3 ounces	177	325
Salmon, canned, solids with bone	3 ounces	118	181
Tahini (sesame butter or paste)	1 tablespoon	94	154
Fruit	Serving Size	Calories	Calcium (mg)
Grapefruit juice, 100%, fortified	1 cup	94	350
Orange juice, 100%, fortified	1 cup	117	34
Other Sources	Serving Size	Calories	Calcium (mg)
Almond beverage (almond milk), unsweetened	1 cup	36	442
Rice beverage (rice milk), unsweetened	1 cup	113	283

Adapted from [USDA Food Data Central](#).

Note on cooked vs. raw vegetables: The calcium values above reflect cooked vegetables. Leafy greens like spinach or kale wilt down dramatically when cooked because they lose volume as water cooks out. So, a cup of raw spinach is mostly air and loosely packed leaves, while a cup of cooked spinach represents several cups' worth of raw leaves compressed into that same cup. Cooking doesn't add calcium; it only packs more spinach into the same cup. When serving raw vegetables, larger portions are needed to achieve a comparable calcium contribution.

For example, it can take roughly 10 cups of raw spinach to yield 1 cup of cooked spinach. So, the calcium (and most other nutrients) per cup goes up proportionally, even though the calcium per gram of spinach hasn't really changed much.

Raw Vegetable Calcium Sources

Vegetable	Serving Size	Calories	Calcium (mg)
Turnip Greens, raw	1 cup	18	104
Dandelion greens, raw	1 cup	25	103
Kale, raw	1 cup	9	53
Bok Choy, raw	1 cup	20	62

Pak choi, raw	1 cup	9	74
Mustard spinach, raw	1 cup	32	315
Amaranth leaves, raw	1 cup	6	60
Nopales, raw	1 cup	24	141
Taro root (dasheen or yautia), raw	1 cup	116	12.2
Jute, raw	1 cup	10	58
Beet greens, raw	1 cup	8	45
Collard greens, raw	1 cup	11	84
Mustard greens, raw	1 cup	15	64
Broccoli, raw	1 cup	31	43
Spinach, raw	1 cup	7	30

Adapted from [USDA Food Data Central](#).

Resources

[Dietary Guidelines for Americans](#)

[Nutrition Services and OAA Requirements](#)

[Nutrition and Aging Resource Center](#)

[Nutrition Guidelines](#)

[National Institute of Diabetes and Digestive and Kidney Disease](#)

[USDA Food Data Central](#)

[Nutrition Needs for Older Adults: Calcium](#)

Disclaimer: All resources provided are from government websites.

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