

Summary of Requirements for Accommodating Special Diets for Adult Participants in the Child and Adult Care Food Program (CACFP)

This document summarizes the requirements for meal modifications for adult participants in adult day care centers that participate in the U.S. Department of Agriculture (USDA) [CACFP](#). The USDA’s regulations require reasonable modifications for adult participants whose disability restricts their diet, based on a written medical statement signed by a recognized medical authority.

Under the [Americans with Disabilities \(ADA\) Amendment Act of 2008](#), most physical and mental impairments will constitute a disability. This includes conditions that impair immune, digestive, neurological, and bowel functions, as well as many others. A physical or mental impairment does not need to be life threatening to constitute a disability. It is sufficient that it limits a major life activity. For example, an adult participant whose digestion is impaired by a food intolerance (such as lactose intolerance or gluten intolerance) may be a person with a disability, regardless of whether consuming the food causes the adult participant severe distress. All disability considerations must be reviewed on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each adult participant.

CACFP adult day care centers may choose to make optional modifications (within the CACFP adult meal patterns) for adult participants whose dietary restrictions do not constitute a disability. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as adult participants who prefers eating a gluten-free diet or organic foods because they believe it is better for their health. For information on the requirements for meal modifications, refer to the Connecticut State Department of Education’s (CSDE) guide, [Accommodating Special Diets in CACFP Adult Day Care Centers](#), and visit the CSDE’s [Special Diets in CACFP Adult Day Care Centers](#) webpage.

Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	What medical statement must include
Adult participant is determined to have a disability (physical or mental impairment) under Section 504, and the disability restricts the adult participant’s diet	Recognized medical authority ¹	<ul style="list-style-type: none"> Individualized Health Care Plan (IHCP) and/or Section 504 Plan May also have an Emergency Care Plan (ECP) depending on adult participant’s medical condition 	Medical conditions that substantially limit a major life activity and affect the adult participant’s diet, for example: <ul style="list-style-type: none"> metabolic diseases, such as diabetes or phenylketonuria (PKU) food anaphylaxis (life-threatening food allergy) 	Yes	Medical statement signed by recognized medical authority ²	<ul style="list-style-type: none"> Information about how the adult participant’s physical or mental impairment restricts the adult participant’s diet An explanation of what must be done to accommodate the adult participant The food or foods to be omitted and recommended alternatives, if appropriate

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Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	What medical statement must include
<p>Adult participant is not determined to have a disability (physical or mental impairment) under Section 504, but the adult participant's medical condition:</p> <ul style="list-style-type: none"> meets the definition of disability under the ADA Amendments Act; and <p>the disability restricts the adult participant's diet</p>	Recognized medical authority ¹	<ul style="list-style-type: none"> IHCP May also have an ECP depending on adult participant's medical condition 	<p>Medical conditions that do not qualify for a disability under Section 504, but may meet the definition of disability under the ADA Amendments Act (any condition that substantially limits a major life activity), for example:</p> <ul style="list-style-type: none"> celiac disease gluten intolerance lactose intolerance ⁴ non-life-threatening food allergies obesity certain temporary disabilities <p>Note: Not all conditions require meal modifications for all adult participants.</p>	Yes	Medical statement signed by recognized medical authority	<ul style="list-style-type: none"> Information about how the adult participant's physical or mental impairment restricts the adult participant's diet An explanation of what must be done to accommodate the adult participant The food or foods to be omitted and recommended alternatives, if appropriate
Personal food preferences	Not applicable	Not applicable	Not applicable	No ^{3,4}	Not applicable	Not applicable
Vegetarianism	Not applicable	Not applicable	Not applicable	No ^{3,4}	Not applicable	Not applicable
Religion	Not applicable	Not applicable	Not applicable	No ^{3,4}	Not applicable	Not applicable

¹ Recognized medical authorities include physicians, physician assistants, doctors of osteopathy, and advanced practice registered nurses (APRNs). The CSDE's medical statement form, *Medical Statement for Meal Modifications in CACFP Adult Day Care Centers*, is available in English and Spanish in the "[Documents/Forms](#)" section of the CSDE's Special Diets in CACFP Adult Day Care Centers webpage.

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- ² These examples of medical conditions are not all-inclusive and may not require meal modifications for all adult participants. The determination of whether an adult participant has a physical or mental impairment that restricts their diet must be made on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each adult participant.
- ³ CACFP adult day care centers may choose to offer one or more allowable milk substitutes for adult participants whose dietary needs do not constitute a disability. The two types of allowable substitutes include: 1) lactose-free or lactose-reduced milk (unflavored low-fat (1%), unflavored fat-free, or flavored fat-free); and 2) nondairy milk substitutes that meet the USDA's nutrition standards for fluid milk substitutes, such as certain brands of soy milk. Nondairy milk substitutes require a written request from the adult participant or guardian/caregiver, but they do not require a medical statement. The written request must identify the dietary need that restricts the adult participant's diet, and the requested allowable milk substitute. For more information, refer to the CSDE's resource, [*Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP*](#).
- ⁴ USDA regulations do not require meal modifications for adult participants without disabilities, such as religion, personal preference, or general health concerns. CACFP adult day care centers can choose to make these accommodations on a case-by-case basis. All meal modifications for adult participants without disabilities must comply with the CACFP adult meal patterns. For more information, refer to the CSDE's [Meal Patterns for CACFP Adult Day Care Centers](#) webpage.

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Resources

Accommodating Special Diets in CACFP Adult Day Care Centers (CSDE guide):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Special_Diets_CACFP_Adults.pdf

Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP_Adults.pdf

CSDE Operational Memorandum No. 2C-18 and 2H-18: Requirements for Meal Modifications in CACFP Child Care Programs:

http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02C18_02H18.pdf

Meal Patterns for CACFP Child Care Programs (CSDE webpage):

<http://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs>

Medical Statements for CACFP Adult Day Care Centers (“Documents/Forms” section of CSDE’s Special Diets in CACFP Adult Day Care Centers webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers/Documents#MedicalStatements>

Requirements for Meal Modifications in CACFP Adult Day Care Centers (CSDE presentation):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal_Modifications_CACFP_Adults_Presentation.pdf

Self-assessment of Adult Day Care Center Practices for Special Diets in the CACFP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Assessment_Special_Diets_CACFP_Adults.pdf

Special Diets in CACFP Adult Day Care Centers (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Adult-Day-Care-Centers>

USDA Memo CACFP 14-2017 and SFSP 10-2017: Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program:

<https://www.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp>

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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 document is available at https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Summary_Chart_Special_Diets_CACFP_Adults.pdf.

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- (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.

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