

Self-assessment of Local Practices for Special Diets in School Nutrition Programs

This tool is intended to help local educational agencies (LEAs) assess current practices for meal modifications in the U.S. Department of Agriculture’s (USDA) school nutrition programs and identify areas in need of improvement. The school nutrition programs include the National School Lunch Program (NSLP), Afterschool Snack Program (ASP) of the NSLP, School Breakfast Program (SBP), Seamless Summer Option (SSO) of the NSLP, Special Milk Program (SMP), Fresh Fruit and Vegetable Program (FFVP), and Child and Adult Care Food Program (CACFP) At-risk Supper Program implemented in schools.

The USDA’s nondiscrimination regulations ([7 CFR 15b](#)) and regulations for the school nutrition programs ([7 CFR 210.10\(m\)](#) and [7 CFR 220.8\(m\)](#)) require reasonable meal modifications for children whose disability restricts their diet, based on documentation from a recognized medical authority. A recognized medical authority is a state-licensed healthcare professional who is authorized to write medical prescriptions under state law, including physicians, physician assistants, doctors of osteopathy, and advanced practice registered nurses. For information on the requirements for meal modifications, refer to the Connecticut State Department of Education’s (CSDE) guide, *Accommodating Special Diets in School Nutrition Programs*, and visit the CSDE’s [Special Diets in School Nutrition Programs](#) webpage.

For children whose dietary restrictions are not related to a disability, LEAs may choose to make optional modifications within the USDA’s meal patterns. For information on the meal patterns for school nutrition programs, visit the CSDE’s webpages, [Meal Patterns for Grades K-12 in School Nutrition Programs](#), [Afterschool Snack Program](#), and [Meal Patterns for Preschoolers in School Nutrition Programs](#); and refer to the CSDE’s guides, *Menu Planning Guide for School Meals for Grades K-12*, *Menu Planning Guide for Preschoolers in the NSLP and SBP*, and *ASP Handbook*.



Step 1 — Assessment. Check the appropriate box to indicate if each practice is fully implemented, partially implemented, or not implemented by the LEA. Refer to the LEA’s policies, guidelines, and standard operating procedures (SOPs) for special diets and meal modifications, including the LEA’s food allergy management plan. Check “Not known” if additional information is needed to determine whether the LEA implements the practice.

Federal and state requirements	Implementation			
	Full	Partial	None	Not known
1. The LEA complies with the federal requirements for meal modifications, including the USDA regulations for school meals (7 CFR 210 and 7 CFR 220), USDA nondiscrimination regulations (7 CFR 15b), Section 504 of the Rehabilitation Act of 1973, the Individuals with Disabilities Education Act (IDEA), the Americans with Disabilities Act (ADA), and the ADA Amendments Act . For more information, refer to section 1 of the CSDE’s guide, <i>Accommodating Special Diets in School Nutrition Programs</i> .				
2. The LEA makes reasonable meal modifications for children whose disability restricts their diet, based on the medical statement signed by a recognized medical authority. The medical statement identifies: 1) how the child’s physical or mental impairment restricts the child’s diet; 2) an explanation of what must be done to accommodate the child; and 3) the food or foods to be omitted and recommended alternatives, if appropriate. Note: The CSDE’s form, <i>Medical Statement for Meal Modifications in School Nutrition Programs</i> , is available in English and Spanish in the “Documents/Forms” section of the CSDE’s Special Diets in School Nutrition Programs webpage.				

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Federal and state requirements, <i>continued</i>	Implementation			
	Full	Partial	None	Not known
3. The LEA maintains a medical statement for each child who requires a meal modification due to a disability. Note: A separate medical statement is not required if the child has an Individualized Education Program (IEP) or Section 504 Plan that includes the required information (see item 2), or the required information is obtained during the development or review of the IEP or 504 Plan.				
4. When identifying children during the meal service who require modified meals and ASP snacks due to a disability, the LEA implements policies and practices that protect children’s privacy and maintain the confidentiality of each child’s medical condition. For more information, refer to “Identifying Students” in section 2 of the CSDE’s guide, <i>Accommodating Special Diets in School Nutrition Programs</i> .				
5. Optional modified meals and ASP snacks for children without a disability comply with the USDA’s meal patterns for school nutrition programs. Examples of optional modifications include requests related to religious or moral convictions, general health concerns, and personal food preferences, such as a family’s preference that their child eats a gluten-free diet or organic foods because they believe it is healthier.				
6. Optional milk substitutions for children without a disability include only lactose-free or lactose-reduced milk (unflavored or flavored low-fat (1%) or fat-free), and/or nondairy milk substitutes that meet the USDA’s nutrition standards for fluid milk substitutes and the state beverage requirements of Section 10-221q of the Connecticut General Statutes (C.G.S.). For more information, refer to section 3 of the CSDE’s guide, <i>Accommodating Special Diets in School Nutrition Programs</i> , and the CSDE’s resource, <i>Milk Substitutes for Children without Disabilities in School Nutrition Programs</i> . Note: For children without a disability, LEAs can never substitute juice, water, or any other beverages for milk, even with a medical statement signed by a recognized medical authority.				
7. The LEA takes appropriate precautions to prepare and serve safe meals and ASP snacks for children with food allergies. Procedures are in place to: <ul style="list-style-type: none"> • develop a food allergy action plan for each child with a life-threatening food allergy; • check ingredients for all foods served to children with food allergies; • designate an area in the kitchen for allergen-free meals, and use separate equipment and utensils during preparation, cooking, and serving; • implement cleaning procedures to prevent cross-contact of possible allergens; and • as required by C.G.S. Section 10-212c, provide annual and ongoing training for staff, including management of children with life-threatening food allergies and administration of epinephrine autoinjectors. 				
8. The school food service department maintains current nutrition information for foods and beverages served in school meals and ASP snacks, which is available to students, families, school nurses, and others as needed. For more information, refer to “Nutrition Information” in section 2 of the CSDE’s guide, <i>Accommodating Special Diets in School Nutrition Programs</i> .				
Team	Full	Partial	None	Not known
9. The LEA includes an interdisciplinary team of appropriate personnel in the planning and implementation of meal modifications for children whose disability restricts their diet. Examples of team members include school food service personnel, school administrators, school nurse, Section 504 team members, registered dietitian, and other school staff with relevant experience.				
10. The team develops and communicates the LEA’s policy and procedures for meal modifications.				

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Written policy and procedures	Implementation			
	Full	Partial	None	Not known
11. The LEA has a written plan for the management of students with life-threatening food allergies, as required by C.G.S. Section 10-212c . For more information, refer to the CSDE’s Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools .				
12. The LEA has a written policy addressing the requirements and procedures for meal modifications in school nutrition programs. For more information, refer to section 5 of the CSDE’s guide, Accommodating Special Diets in School Nutrition Programs , and visit the “What’s Next” section of the CSDE’s Special Diets in School Nutrition Programs webpage.				
13. The LEA has written SOPs for meal modifications, such as:				
• preparing foods for special diets, e.g., texture modifications, food allergies, celiac disease, and diabetes;				
• reviewing menus, reading food labels, and making nutrition information available to students, families, school nurses, and others as needed;				
• cleaning to prevent cross-contact of possible food allergens;				
• handwashing to prevent cross-contact of possible food allergens;				
• ensuring that school food service personnel, school nurses, and other appropriate school staff (e.g., school dietitian, cafeteria aides, teachers, teachers’ aides, and administrators), regularly communicate and collaborate regarding the planning and implementation of meal modifications for children whose disability restricts their diet;				
• obtaining consultation services (such as a registered dietitian), as needed, to plan meals and ASP snacks for children whose disability restrict their diet; and				
• training for all staff (including substitutes) involved with preparing and serving modified meals and ASP snacks to children whose disability restricts their diet.				
14. LEAs with 15 or more employees: The LEA designates at least one person to coordinate compliance with the disability requirements of the USDA nondiscrimination regulations (7 CFR 15b.6). For more information, refer to section 5 of the CSDE’s guide, Accommodating Special Diets in School Nutrition Programs . Note: In many cases, the Section 504 Coordinator is responsible for addressing requests for accommodations in the school in general and may also be responsible for ensuring compliance with disability requirements related to meals and the meal service.				
15. As required by USDA regulations 7 CFR 15b.25 and 7 CFR 15b.6(b) , the LEA has a written procedural safeguards process that provides notice and information to parents and guardians regarding how to request a reasonable meal modification and their procedural rights for grievance procedures. For more information, refer to section 5 of the CSDE’s guide, Accommodating Special Diets in School Nutrition Programs .				

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Communication	Implementation			
	Full	Partial	None	Not known
16. The school health services department regularly communicates with all school nurses regarding the requirements for meal modifications, the LEA's policy and SOPs, and the individual accommodations for each child whose disability requires a meal modification.				
17. School nurses regularly communicate with the food service director and cafeteria managers regarding the individual accommodations for each child whose disability requires a meal modification.				
18. The food service director and cafeteria managers regularly communicate with all school food service personnel regarding the requirements for meal modifications, the LEA's policy and SOPs, and the individual accommodations for each child whose disability requires a meal modification.				
19. The LEA regularly communicates with parents and guardians regarding meal modifications for children, including:				
• the LEA's policy and SOPs for managing meal modifications for children whose disability restricts their diet;				
• procedures for parents and guardians to request meal modifications for children whose disability restricts their diet, including how to complete the medical statement (items 2 and 3);				
• procedures for managing life-threatening food allergies, including the food allergy management plan (item 11).				
• procedures for obtaining nutrition information for school meals and ASP snacks (item 8); and				
• procedural rights for grievance procedures (item 15).				
20. The LEA's policy and SOPs for meal modifications are posted on the LEA's website and shared with children and parents/guardians through other means, such as parent and student handbooks, newsletters, e-mails, handouts, menu backs, bulletin boards and displays, meetings, school events, and public service announcements.				
21. As required by C.G.S. Section 10-212 , the LEA's allergy management plan for children with life-threatening food allergies is available publicly via the district's website, individual school's website, or other appropriate means if a website does not exist.				

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Professional Development	Full	Partial	None	Not known
22. School food service personnel receive professional development on accommodating special diets at least annually.				
23. Professional development for school food service personnel includes training on:				
• the USDA requirements for meal modifications and documentation, i.e., medical statement, IEP, or Section 504 Plan (items 1-3);				
• types of special diets and required modifications for menus and recipes;				
• how to read food labels for nutrition information and ingredients;				
• cleaning and handwashing procedures to prevent cross-contact of possible food allergens;				
• planning, preparing, and serving appropriate and safe meals and ASP snacks;				
• how to implement the LEA’s policy and SOPs for meal modifications (items 11-15); and				
• procedures for maintaining the confidentiality of each child’s medical condition during the meal service (item 4).				
24. School nurses receive ongoing professional development on accommodating special diets.				
25. Professional development for school nurses includes training on:				
• the USDA requirements for meal modifications and documentation, i.e., medical statement, IEP, or Section 504 Plan (items 1-3);				
• medical diagnoses and management of special diets; and				
• how to implement the LEA’s policy and SOPs for meal modifications (items 11-15).				
26. Other school personnel receive professional development as appropriate to their job responsibilities (e.g., cafeteria aides, teachers, teacher’s aides, bus drivers, and other school staff).				
Monitoring and review	Full	Partial	None	Not known
27. The LEA implements monitoring procedures to ensure that each school consistently follows the LEA’s policy and SOPs for meal modifications.				
28. The LEA implements monitoring procedures to ensure that meal modifications are reasonable, appropriate, and meet each child’s dietary needs.				
29. The LEA reviews the policy and SOPs for meal modifications at least annually, and makes changes as needed.				

Step 2 — Prioritize the areas for change. Refer to the areas rated “none” or “partial” and identify the priority areas for change in the LEA.

1. _____
2. _____
3. _____
4. _____
5. _____

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Step 3 — Develop an action plan for each priority area. For more information, refer to the CSDE’s form, *Action Planning Form*, and the CSDE’s sample completed action planning forms, *Sample Action Plan: Developing District Policy for Accommodating Special Diets* and *Sample Action Plan: Promoting District Policy for Accommodating Special Diets*.

Resources

Accommodating Children with Disabilities in the School Meal Programs (USDA):

<https://fns-prod.azureedge.net/sites/default/files/cn/SP40-2017a1.pdf>

Accommodating Special Diets in School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Special_Diets_Guide_SNP.pdf

Action Planning Form (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Action_Planning_Form.docx

Allowable Milk Substitutes for Children without Disabilities in School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Milk_Substitutes_SNP.pdf

CSDE Operational Memorandum No. 13-17: Requirements for Meal Modifications in the School Nutrition Programs:

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Memos/OM2017/OM13-17.pdf>

Managing Food Allergies in the Cafeteria: The Role of School Food Service Managers and Staff (CSDE Presentation):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Managing_Food_Allergies_Cafeteria_SNP_Presentation.pdf

Meal Modifications in School Nutrition Programs (CSDE Presentation):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Meal_Modifications_SNP_Presentation.pdf

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-School-Nutrition-Programs>

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):

<https://portal.ct.gov/SDE/Nutrition/Meal-Patterns-Preschoolers-in-School-Nutrition-Programs>

Medical Statements for School Nutrition Programs (“Documents/Forms” section of CSDE’s Special Diets in School Nutrition Programs webpage):

<https://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs/Documents#MedicalStatements>

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Requirements for Meal Modifications in School Nutrition Programs (CSDE Presentation):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/SpecialDietsPresentation.pdf>

Sample Action Plan: Developing District Policy for Meal Modifications in School Nutrition Programs:

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Action_Policy_Special_Diets_SNP.pdf

Sample Action Plan: Promoting District Policy for Meal Modifications in School Nutrition Programs:

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Action_Promote_Special_Diets_SNP.pdf

Special Diets in School Nutrition Programs (CSDE webpage):

<http://portal.ct.gov/SDE/Nutrition/Special-Diets-in-School-Nutrition-Programs>

Summary of Requirements for Accommodating Special Diets in School Nutrition Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/SpecDiet/Summary_Chart_Special_Diets_SNP.pdf

USDA Memo SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As):

<https://www.fns.usda.gov/school-meals/accommodating-disabilities-school-meal-programs-guidance-and-qas>

USDA Memo SP 59-2016: Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs:

<https://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs>

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For more information, visit the Connecticut State Department of Education's (CSDE) [Special Diets in School Nutrition Programs](#) webpage or contact the [school nutrition programs 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/NSLP/SpecDiet/Assessment_Special_Diets_Schools.pdf.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: <https://www.usda.gov/oascr/how-to-file-a-program-discrimination-complaint>, and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (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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