Sample Action Plan for Developing Policy for Meal Modifications in the Child and Adult Day Food Program

This sample is intended as a guide. Individual programs may require different actions, resources, or staff.

Step 1: Identify the objective and target date for completion. Complete a separate action planning form for each objective.

Objective	Target date
To develop a center policy and standard operating procedure (SOP) for providing meal modifications in the CACFP, ensuring that all participants with dietary restrictions for disability or non-disability reasons receive reasonable modifications in accordance with the USDA regulations and federal nondiscrimination laws.	September 30

Step 2: Identify the actions needed to meet the objective above. For each action, identify the materials and resources needed, the staff responsible, and the target date for completion.

Actions	Materials and resources needed	Staff responsible	Target date
1. Identify the center's procedures and timeline for approving policies and SOPs. Schedule time on the agenda for any required policy review and approval meetings.	Center's policy requirements and applicable committee meeting schedules (e.g., governing board or administrative team)	Program administrator	September 30

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Actions	Materials and resources needed	Staff responsible	Target date
2. Review the federal and state requirements for meal modifications for participants with and without disabilities in the CACFP.	Federal and state regulations • Section 504 of the Rehabilitation Act of 1973 (Section 504) • Individuals with Disabilities Education Act (IDEA) • Americans with Disabilities Act (ADA) of 1990, including changes made by the ADA Amendments Act of 2008 • USDA nondiscrimination regulations (7 CFR 15b) • USDA regulations for the CACFP (7 CFR 226.20(g)) • Connecticut State Department of Education (CSDE) resources (refer to "Resources" in this document):	Food service director, school nurse supervisor, special education director, pupil services director	October 30
3. Conduct a self-assessment of the center's current practices and procedures for meal modifications in the CACFP.	• **Child Care:** Self-assessment of Child Care Practices for Meal Modifications in the Child and Adult Care Food Program • **Adult Day Care:** Self-assessment of Adult Day Care Center Practices for Meal Modifications in the Child and Adult Care Food Program • Input from various disciplines, such as food service, health services, medical advisor, registered dietitian, special education, and district administration.	Program administrator, food service director, nurse, registered dietitian	October 30

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4. Identify existing policies and SOPs for meal modifications in the CACFP (federal, state, and local) through web searches and contacting other CACFP centers and organizations. If using other policy language as a template, review for consistency with federal and state requirements.	Sample policies, SOPs, resources, and webpages • Guidance and resources on SOPs in section 4 of the CSDE's Guide to Meal Modifications for Child Care Programs in the Child and Adult Care Food Program • Guidance and resources on SOPs in section 4 of the CSDE's Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program • Sample Standard Operating Procedure (SOP) for Meal Modifications for Children in the Child and Adult Care Food Program (CSDE) • Sample Standard Operating Procedure (SOP) for Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program (CSDE) • Additional CSDE resources (refer to "Resources" in this document) • Federal and state requirements (refer to step 2)	Food service director, nurse, registered dietitian, disability coordinator	November 30

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Actions	Materials and resources needed	Staff responsible	Target date
5. Identify topics for inclusion in the policy and SOPs, such as federal and state requirements; requesting meal modifications; making nutrition information available for CACFP meals and snacks; cleaning and handwashing procedures to prevent cross-contact of possible food allergens; ensuring staff communication and collaboration regarding meal modifications for participants whose disability restricts their diet; and training for staff (including substitutes) involved with planning, preparing, and serving CACFP meals and snacks. Write draft of policy and SOPs.	Sample policies, SOPs, resources, and webpages • Guide to Meal Modifications for Child Care Programs in the Child and Adult Care Food Program (CSDE) • Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program CSDE) • Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools (CSDE) *Applies to child care centers in public schools* • Sample Standard Operating Procedure (SOP) for Meal Modifications for Children in the Child and Adult Care Food Program (CSDE) • Sample Standard Operating Procedure (SOP) for Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program (CSDE) • Additional CSDE resources (refer to "Resources" in this document) • Federal and state requirements (refer to step 2)	Food service director, school nurse supervisor, support staff	January 31

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Actions	Materials and resources needed	Staff responsible	Target date
6. Get feedback on the draft policy and SOPs from the center's administration and other appropriate staff. Assemble review committee and submit draft policy for review.	Review committee of representatives from various disciplines, such as food service, nurse, registered dietitian, disability coordinator, administration, and program policy committee.	Program administrator, food service director	March 1
7. Make edits and submit draft policy and SOPs for final review and approval.	Program team responsible for final policy approval, e.g., policy committee, governing board, and administrator.	Program administrator, food service director	April 3
8. Convert final policy and SOPs to PDF documents for distribution and posting on center's website.	• Policy document and SOPs. • Access to center's computer technology staff for web posting.	Program administrator, computer technology staff	April 30

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Resources

Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/milk_substitutes_cacfp_adults.pdf

Allowable Fluid Milk Substitutes for Non-disability Reasons for Children in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/milk_substitutes_cacfp.pdf

CACFP Regulations 7 CFR 226.20(g)(1): Modifications for disability reasons (USDA):
https://www.ecfr.gov/current/title-7/part-226#p-226.20(g)(1)

CACFP Regulations 7 CFR 226.20(g)(3): Fluid milk substitutes for non-disability reasons (USDA):
https://www.ecfr.gov/current/title-7/part-226#p-226.20(g)(3)

Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide_meal_modifications_cacfp_adults.pdf

Guide to Meal Modifications for Child Care Programs in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide_special_diets_cacfp.pdf

Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools (CSDE):
https://portal.ct.gov/sde/publications/managing-life-threatening-food-allergies-in-connecticut-schools
Applies to child care centers in public schools

Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/identify_allowable_nondairy_milk_substitutes_snp.pdf

Medical Statements (CSDE's Special Diets in the Child and Adult Care Food Program webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-the-child-and-adult-care-food-program/medical-statements

Milk Substitutes for Non-disability Reasons (CSDE's Special Diets in the Child and Adult Care Food Program webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-the-child-and-adult-care-food-program/milk-substitutes-for-non-disability-reasons

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Sample Standard Operating Procedure (SOP) for Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp_adults.docx

Sample Standard Operating Procedure (SOP) for Meal Modifications for Children in the Child and Adult Care Food Program (CSDE) (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp.docx

Special Diets in the Child and Adult Care Food Program (CSDE webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-the-child-and-adult-care-food-program

Summary Charts of the Requirements for Meal Modifications for Adult Participants in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/summary_chart_meal_modifications_cacfp_adults.pdf

Summary Charts of the Requirements for Meal Modifications for Children in the Child and Adult Care Food Program (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/summary_chart_meal_modifications_cacfp.pdf

USDA Memo CACFP 01-2025: Nutrition Requirements for Fluid Milk and Substitutions in the CACFP, Questions and Answers:
https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-qas

USDA Memo CACFP 14-2017 and SFSP 10-2017: Policy Memorandum on Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program:
https://www.fna.usda.gov/cr/cacfp/modifications-accomodate-disabilities

USDA Nondiscrimination Regulations (7 CFR B):
https://www.ecfr.gov/current/title-7/subtitle-A/part-15b

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For more information, visit the CSDE's Special Diets in the Child and Adult Care Food Program webpage or contact the CACFP staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841. This document is available at https://portal.ct.gov/-/ media/ sde/nutrition/cacfp/specdiet/action_policy_meal_modifications_cacfp.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; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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