

Action Planning Form

Sample Action Plan: 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.	<p>Applicable federal and state regulations</p> <ul style="list-style-type: none"> • Section 504 of the Rehabilitation Act of 1973 (Section 504); • the Individuals with Disabilities Education Act (IDEA); • the 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) <ul style="list-style-type: none"> ○ 7 CFR 226.20(g)(1): Modifications for disability reasons ○ 7 CFR 226.20(g)(2): Variations for non-disability reasons ○ 7 CFR 226.20(g)(3): Fluid milk substitutes for non-disability reasons • Connecticut General Statutes (C.G.S.) Section 10-212c: School District Plan for Life-threatening Food Allergies • Additional Connecticut State Department of Education (CSDE) resources: Refer to “CSDE Resources for CACFP Child Care Programs” and “CSDE Resources for CACFP Adult Day Care Centers” in this document. 	Program administrator, food service director, nurse, registered dietitian	October 30
3. Conduct a self-assessment of the center’s current practices and procedures for meal modifications in the CACFP.	<ul style="list-style-type: none"> • 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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Actions	Materials and resources needed	Staff responsible	Target date
<p>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.</p>	<ul style="list-style-type: none"> • Sample policies, SOPs, guides, handouts, and webpages. • Federal and state requirements (refer to step 2). <p>Child care programs</p> <ul style="list-style-type: none"> • Guidance and resources on SOPs: Section 4 of the CSDE’s Guide to Meal Modifications in CACFP Adult Day Care Centers • Sample Standard Operating Procedure (SOP) for Meal Modifications in Adult Day Care Centers in the Child and Adult Care Food Program • Additional CSDE resources: Refer to “CSDE Resources for CACFP Child Care Programs” in this document. <p>Adult day care centers</p> <ul style="list-style-type: none"> • Guidance and resources on SOPs: Section 4 of the CSDE’s Guide to Meal Modifications in CACFP Adult Day Care Centers • Sample Standard Operating Procedure (SOP) for Meal Modifications in Adult Day Care Centers in the Child and Adult Care Food Program • Additional CSDE resources: Refer to “CSDE Resources for CACFP Adult Day Care Centers” in this document. 	<p>Food service director, nurse, registered dietitian, disability coordinator</p>	<p>November 30</p>

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Actions	Materials and resources needed	Staff responsible	Target date
<p>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.</p>	<ul style="list-style-type: none"> • Federal and state requirements (refer to step 2). • Sample policies and SOPs. <p>Child care programs</p> <ul style="list-style-type: none"> • Guide to Meal Modifications in CACFP Child Care Programs • Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools (applies only to child care centers in public schools) • Sample Standard Operating Procedure (SOP) for Meal Modifications in Adult Day Care Centers in the Child and Adult Care Food Program <p>Adult day care centers</p> <ul style="list-style-type: none"> • Guide to Meal Modifications in CACFP Adult Day Care Centers • Sample Standard Operating Procedure (SOP) for Meal Modifications in Adult Day Care Centers in the Child and Adult Care Food Program 	<p>Program administrator, food service director, nurse, registered dietitian, disability coordinator</p>	<p>January 31</p>

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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.	<ul style="list-style-type: none"> ● 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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CSDE Resources for CACFP Child Care Programs

- [Allowable Fluid Milk Substitutes for Non-disability Reasons for Children in the Child and Adult Care Food Program](#)
- [Allowable Fluid Milk Substitutes for Non-Disability Reasons in the Child and Adult Day Food Program](#)
- [Developing Policies for Meal Modifications](#) (“What’s Next” section of CSDE’s Special Diets in CACFP Child Care Programs webpage)
- [Guide to Meal Modifications in CACFP Child Care Programs](#)
- [Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools](#) (applies only to child care centers in public schools).
- [Meal Patterns for CACFP Child Care Programs](#) (CSDE webpage)
- [Overview of the Requirements for Meal Modifications for Children in the Child and Adult Care Food Program](#)
- [Resource List for Special Diets in the Child Nutrition Programs](#)
- [Sample Standard Operating Procedure \(SOP\) for Meal Modifications in Child Care Facilities in the Child and Adult Care Food Program](#)
- [Self-assessment of Child Care Practices for Meal Modifications in the Child and Adult Care Food Program](#)
- [Special Diets in CACFP Child Care Programs](#) (CSDE webpage)
- [Summary Charts of the Requirements for Meal Modifications for Children in the Child and Adult Care Food Program](#)

CSDE Resources for CACFP Adult Day Care Centers

- [Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the Child and Adult Care Food Program](#)
- [Allowable Milk Substitutes for Adult Participants without Disabilities in the CACFP](#)
- [Developing Policies for Meal Modifications](#) (“What’s Next” section of CSDE’s Special Diets in CACFP Adult Day Care Centers webpage)
- [Guide to Meal Modifications in CACFP Adult Day Care Centers](#)
- [Meal Modifications in Adult Day Care Centers in the Child and Adult Care Food Program](#)
- [Meal Patterns for CACFP Adult Day Care Centers](#) (CSDE webpage)
- [Overview of the Requirements for Meal Modifications for Adult Participants in the Child and Adult Care Food Program](#)
- [Resource List for Special Diets in the Child Nutrition Programs](#)
- [Self-assessment of Adult Day Care Center Practices for Meal Modifications in the CACFP](#)
- [Special Diets in CACFP Adult Day Care Centers](#) (CSDE webpage)
- [Summary Charts of Requirements for Meal Modifications for Adult Participants in the CACFP](#)

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For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage or [Special Diets in CACFP Adult Day Care Centers](#), 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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