

Self-assessment of Child Care Practices for Meal Modifications in the Child and Adult Care Food Program

This tool is intended to help child care centers and family day care homes assess their current practices for meal modifications in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP) and identify areas in need of improvement.

Required Modifications for Disability Reasons

The USDA's nondiscrimination regulations ([7 CFR 15b](#)) and CACFP regulations ([7 CFR 226.20\(g\)](#)) require CACFP facilities to make reasonable meal modifications on a case-by-case basis for children whose disability restricts their diet, based on written documentation from a state licensed healthcare professional (physician, physician assistant, doctor of osteopathy, or advanced practice registered nurse) or registered dietitian. "Case-by-case basis" means that the meal modifications are specific to the individual medical condition and dietary needs of each child.

For guidance on the meal modification requirements for disability reasons, refer to section 2 of the Connecticut State Department of Education's (CSDE) [Guide to Meal Modifications in CACFP Child Care Programs](#). Additional resources and medical statement forms are available on the CSDE's [Special Diets in CACFP Child Care Programs](#) webpage.

Optional Modifications for Non-disability Reasons

CACFP facilities have the option to make meal modifications within or outside the CACFP meal patterns on a case-by-case basis for children whose dietary needs do not constitute a disability. Optional modifications for non-disability reasons include requests related to religious or moral convictions, general health concerns, and personal food preferences. An example is a family's preference for gluten-free foods, organic foods, or almond milk because they believe these foods are healthier.

- **Modifications within the USDA meal patterns:** Meal modifications are within the meal patterns if they are only modified for texture (such as chopped, ground, or pureed foods) or include substitutions within the same meal component, such as a banana for strawberries (fruits component), lactose-free milk for regular milk (milk component), and chicken for pork (meats/meat alternates component). These modifications do not require a medical statement. However, the CSDE recommends obtaining a medical statement to ensure clear communication between parents/guardians and the CACFP facility regarding the appropriate meal modifications for the child.
- **Modifications outside the USDA meal patterns:** Meal modifications are outside the meal patterns if they include noncreditable foods. Noncreditable foods are foods and beverages that do not meet the CACFP meal pattern requirements for reimbursable meals and snacks (refer to the CSDE's resource, [Noncreditable Foods for Child Care Programs in the Child and Adult Care Food Program](#)). Examples include entrees that do not meet the meats/meat alternates component and substituting rice milk for cow's milk. Meal modifications for non-disability reasons that are outside the meal patterns require a medical statement signed by a state licensed healthcare professional or registered dietitian.

For guidance on optional meal modifications for non-disability reasons, refer to section 3 of the CSDE's [Guide to Meal Modifications in CACFP Child Care Programs](#).

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

Federal and State Requirements	Full	Partial	None	Not known
<p>1. The CACFP facility complies with the following federal requirements for meal modifications: the USDA regulations for meal modifications (7 CFR 226.20(g)); the 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 to Meal Modifications in CACFP Child Care Programs.</p>				
<p>2. The CACFP facility makes reasonable meal modifications for children whose disability restricts their diet, based on the medical statement signed by a state licensed healthcare professional or registered dietitian. 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. The CSDE’s medical statement form and instructions are available in English and Spanish in the Documents/Forms” section of the CSDE’s Special Diets in CACFP Child Care Programs webpage.</p>				
<p>3. The CACFP facility maintains one of the following on file for each child who requires a meal modification for disability reasons: 1) a medical statement signed by a state licensed healthcare professional or registered dietitian that includes the required information (refer to item 2); a written statement (such as a doctor’s note) signed by a state licensed healthcare professional or registered dietitian that includes the required information (refer to item 2); or 3) an Individualized Education Program (IEP) or Section 504 Plan that includes the required information (refer to item 2).</p>				
<p>4. When identifying children during the meal service who require modified meals and snacks for disability reasons, the CACFP facility 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 Children” in section 2 of the CSDE’s Guide to Meal Modifications in CACFP Child Care Programs.</p>				
<p>5. Optional meal modifications for non-disability reasons meet the USDA’s CACFP meal patterns unless the parent/guardian provides a medical statement signed by a state licensed healthcare professional or registered dietitian. Optional modifications for non-disability reasons include requests related to religious or moral convictions, general health concerns, and personal food preferences. An example is a family’s preference for gluten-free foods, organic foods, or almond milk because they believe these foods are healthier.</p>				

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Federal and State Requirements, <i>continued</i>	Full	Partial	None	Not known
6. Optional fluid milk substitutes (i.e., plant-based beverages such as soy milk) for non-disability reasons meet the USDA's nutrition standards for fluid milk substitutes. Fluid milk substitutes offered in child care centers in public schools also meet 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 to Meal Modifications in CACFP Child Care Programs and the CSDE's resources, Allowable Fluid Milk Substitutes for Non-disability Reasons for Children in the Child and Adult Care Food Program and Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the Child and Adult Care Food Program . Note: CACFP facilities cannot substitute any other beverages for non-disability reasons (such as juice and water), even with a medical statement signed by the child's state licensed healthcare professional or registered dietitian.				
7. The CACFP facility takes appropriate precautions to prepare and serve safe meals and 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; 				
<ul style="list-style-type: none"> • check ingredients for all foods served to children with food allergies; 				
<ul style="list-style-type: none"> • designate an area in the kitchen for allergen-free meals, and use separate equipment and utensils during preparation, cooking, and serving; 				
<ul style="list-style-type: none"> • implement cleaning procedures to prevent cross-contact of possible allergens; and 				
<ul style="list-style-type: none"> • provide annual and ongoing training for staff, including management of children with life-threatening food allergies and administration of epinephrine autoinjectors. 				
8. The CACFP facility maintains current nutrition information for foods and beverages served in reimbursable meals and snacks. This nutrition information is available to children (when age appropriate), families, medical professionals, and others as needed. For more information, refer to "Nutrition Information" in section 2 of the CSDE's Guide to Meal Modifications in CACFP Child Care Programs .				

Team Approach	Full	Partial	None	Not known
9. The CACFP facility includes an interdisciplinary team of appropriate personnel in the planning and implementation of meal modifications for disability reasons. Examples of team members include program administrator, sponsoring organization representative, health consultant (e.g., nurse), registered dietitian, disability coordinator, and other individuals with relevant experience.				
10. The team develops the CACFP facility's policy and procedures for meal modifications and communicates this information parents/guardians and staff.				

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Written Policy and Procedures	Full	Partial	None	Not known
11. The CACFP facility has a written policy addressing the requirements and procedures for meal modifications in the CACFP. For more information, refer to section 4 of the CSDE's Guide to Meal Modifications in CACFP Child Care Programs and visit the "What's Next" section of the CSDE's Special Diets in CACFP Child Care Programs webpage.				
12. The CACFP facility has a written SOP for meal modifications in the CACFP. For more information, refer to the CSDE's Sample Standard Operating Procedure (SOP) for Meal Modifications in Child Care Facilities in the Child and Adult Care Food Program .				
13. The CACFP facility has written SOPs for other meal modification procedures applicable to the program's specific needs, such as.				
<ul style="list-style-type: none"> • preparing foods for different types of special diets, e.g., texture modifications, food allergies, celiac disease, and diabetes; 				
<ul style="list-style-type: none"> • reviewing menus, reading food labels, and making nutrition information available to children (when age appropriate), families, medical professionals, and others as needed; 				
<ul style="list-style-type: none"> • cleaning to prevent cross-contact of possible food allergens; 				
<ul style="list-style-type: none"> • handwashing to prevent cross-contact of possible food allergens; 				
<ul style="list-style-type: none"> • ensuring that food service staff and child care program staff regularly communicate and collaborate regarding the planning and implementation of meal modifications for disability reasons; 				
<ul style="list-style-type: none"> • obtaining consultation services (such as a registered dietitian), as needed, to plan and prepare modifications for disability reasons; and 				
<ul style="list-style-type: none"> • training for all staff and substitutes involved with preparing and serving modified meals and snacks. 				
14. CACFP facilities with 15 or more employees: The CACFP facility designates at least one person to coordinate compliance with the disability requirements of the USDA nondiscrimination regulations (7 CFR 15b.6 (a)). Note: In many cases, the Section 504 Coordinator is responsible for addressing accommodation requests in general and may also be responsible for ensuring compliance with meal modifications for disability reasons. For more information, refer to section 4 of the CSDE's Guide to Meal Modifications in CACFP Child Care Programs .				
15. CACFP facilities with 15 or more employees: As required by USDA regulations 7 CFR 15b.25 and 7 CFR 15b.6(b) , the CACFP facility has written grievance procedures that incorporate appropriate due process standards and that provide for the prompt and equitable resolution of complaints. For more information, refer to section 4 of the CSDE's Guide to Meal Modifications in CACFP Child Care Programs				

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Communication	Full	Partial	None	Not known
16. The CACFP facility regularly communicates with all food service and applicable child care staff regarding the requirements for meal modifications, the meal modifications policy and SOPs, and the individual accommodations for each child whose disability requires a meal modification.				
17. The CACFP facility regularly communicates with parents/guardians regarding meal modifications for children, including:				
<ul style="list-style-type: none"> • the CACFP facility’s policy and SOPs for managing meal modifications for disability reasons; 				
<ul style="list-style-type: none"> • procedures for parents/guardians to request meal modifications for disability reasons, including how to complete the medical statement (items 2 and 3); 				
<ul style="list-style-type: none"> • procedures for managing life-threatening food allergies, including the food allergy management plan (item 7). 				
<ul style="list-style-type: none"> • procedures for obtaining nutrition information for CACFP meals and snacks (item 8); and 				
<ul style="list-style-type: none"> • procedural rights for grievance procedures (item 15), 				
18. The CACFP facility’s policy and SOPs for meal modifications are posted on the CACFP facility’s website and shared with families through a variety of communication channels, such as parent handbooks, newsletters, emails, handouts, menu backs, bulletin boards and displays, meetings, school events, and public service announcements.				

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Professional Development	Full	Partial	None	Not known
20. Food service staff receive professional development on accommodating special diets at least annually.				
21. Professional development for food service staff includes training on: <ul style="list-style-type: none"> • 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 snacks; • how to implement the CACFP facility’s policy and SOPs for meal modifications (items 11-14); and • procedures for maintaining the confidentiality of each child’s medical condition during the meal service (item 4). 				
22. CACFP facility staff receive professional development about meal modifications, as appropriate to their job responsibilities (e.g., administrators, health consultants, teachers, teacher’s aides, bus drivers, and other child care staff).				

Monitoring and Review	Full	Partial	None	Not known
23. The CACFP facility implements monitoring procedures and conducts periodic reviews to ensure that all staff consistently follow the policy and SOPs for meal modifications. Any issues or concerns are promptly addressed.				
24. The CACFP facility implements monitoring procedures to ensure that meal modifications are reasonable, appropriate, and meet each child’s dietary needs. Any issues or concerns are promptly addressed.				
25. The CACFP facility reviews the policy and SOPs for meal modifications at least annually, and makes necessary adjustments based on feedback, regulatory changes, policies, and best practices.				

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

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

Step 3 — Develop an action plan for each priority area. For more information, refer to the CSDE’s [Action Planning Form](#) and the sample completed forms, [Sample Action Plan: Developing Policy for Meal Modifications in the CACFP](#) and [Sample Action Plan: Promoting Policy for Meal Modifications in the CACFP](#).

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Resources

Action Planning Form (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/action_planning_form.docx

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

Guide to Meal Modifications in CACFP Child Care Programs (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/guide_special_diets_cacfp.pdf

Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/identify_allowable_nondairy_milk_substitutes_cacfp.pdf

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

<https://portal.ct.gov/sde/nutrition/meal-patterns-cacfp-child-care-programs>

Medical Statements ("Documents/Forms" section of CSDE's Special Diets in CACFP Child Care Programs webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-cacfp-child-care-programs/documents#MedicalStatements>

Overview 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/overview_meal_modifications_cacfp.pdf

Sample Action Plan: Developing Policy for Meal Modifications in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/action_policy_meal_modifications_cacfp.pdf

Sample Action Plan: Promoting Policy for Meal Modifications in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/action_promote_meal_modifications_cacfp.pdf

Sample Standard Operating Procedure (SOP) for Meal Modifications in Child Care Facilities in the Child and Adult Care Food Program (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp.docx

Special Diets in CACFP Child Care Programs (CSDE webpage):

<https://portal.ct.gov/sde/nutrition/special-diets-in-cacfp-child-care-programs>

Summary Charts of the Requirements for Meal Modifications for Children in the CACFP (CSDE):

https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/summary_chart_meal_modifications_cacfp.pdf

USDA Nondiscrimination Regulations (7 CFR B):

<https://www.ecfr.gov/current/title-7/subtitle-A/part-15b>

USDA Memo CACFP 14-2017, and SFSP 10-2017: Modifications to Accommodate Disabilities in CACFP and SFSP:

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

USDA Memo CACFP 17-2016: Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the CACFP, Q&As:

<https://www.fns.usda.gov/cacfp/nutrition-requirements-fluid-milk-and-fluid-milksubstitutions-cacfp-qas>

USDA CACFP regulations 7 CFR 226.20(g): Modifications and variations in reimbursable meals and snacks:

[https://www.ecfr.gov/current/title-7/part-226#p-226.20\(g\)](https://www.ecfr.gov/current/title-7/part-226#p-226.20(g))

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For more information, visit the CSDE's [Special Diets in CACFP Child Care Programs](#) 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/assessment_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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