

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

This tool is intended to help adult day care centers that participate in the U.S. Department of Agriculture’s (USDA) [Child and Adult Care Food Program \(CACFP\)](#) assess their current practices for meal modifications and identify areas in need of improvement.



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Required Modifications for Disability Reasons

The USDA's nondiscrimination regulations ([7 CFR 15b](#)) and CACFP regulations ([7 CFR 226.20\(g\)](#)) require Adult day care centers to make reasonable meal modifications on a case-by-case basis for participants 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 participant.

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 for Adult Day Care Centers in the Child and Adult Care Food Program](#). Additional resources and medical statement forms are available on the CSDE's [Special Diets in the Child and Adult Care Food Program](#) webpage.

Optional Modifications for Non-disability Reasons

Adult day care centers have the option to make meal modifications within or outside the CACFP adult meal patterns on a case-by-case basis for participants 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 CACFP adult 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.
- **Modifications outside the CACFP adult 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 meal pattern requirements for reimbursable meals and snacks (refer to the "[Noncreditable Foods](#)" section of the CSDE's Crediting Foods in the Child and Adult Care Food Program webpage). Examples include entrees that do not meet the crediting requirements for the [meats/meat alternates component](#) and substituting rice milk for cow's milk. Meal modifications for non-disability reasons that are outside the meal

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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 for Adult Day Care Centers in the Child and Adult Care Food Program](#).

Step 1 — Assessment

Check the appropriate box to indicate if each practice is fully implemented, partially implemented, or not implemented by the adult day care center. Refer to the adult day care center'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 adult day care center implements the practice.

Part A — Federal and State Requirements	Full	Partial	None	Not known
1. The adult day care center 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; and 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 for Adult Day Care Centers in the Child and Adult Care Food Program .				

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Part A – Federal and State Requirements	Full	Partial	None	Not known
<p>2. The adult day care center makes reasonable meal modifications for participants 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 participant’s physical or mental impairment restricts the participant’s diet; 2) an explanation of what must be done to accommodate the participant; 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 “Medical Statements” section of the CSDE’s Special Diets in the Child and Adult Care Food Program webpage.</p>				
<p>3. The adult day care center maintains one of the following on file for each participant 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>				

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Part A – Federal and State Requirements	Full	Partial	None	Not known
<p>4. When identifying participants during the meal service who require modified meals and snacks for disability reasons, the adult day care center implements policies and practices that protect participants' privacy and maintain confidentiality of each participant's medical condition. For more information, refer to "Identifying Participants" in section 2 of the CSDE's <u>Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program</u>.</p>				
<p>5. Optional meal modifications for non-disability reasons meet the CACFP adult meal patterns unless the participant or their guardian/caregiver 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 participant's preference for gluten-free foods, organic foods, or almond milk because they believe these foods are healthier.</p>				

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Part A – Federal and State Requirements	Full	Partial	None	Not known
<p>6. Optional fluid milk substitutes for non-disability reasons (e.g., nondairy plant-based beverages like fortified soy milk) meet the USDA’s nutrition standards for fluid milk substitutes defined in 7 CFR 226.20(g)(3) of the CACFP regulations. For more information, refer to section 3 of the CSDE’s Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program and the CSDE’s resources, Allowable Fluid Milk Substitutes for Non-disability Reasons for Participants 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: Adult day care centers cannot substitute any other beverages for non-disability reasons (such as juice and water), even with a medical statement signed by the participant’s state licensed healthcare professional or registered dietitian.</p>				
<p>7. The adult day care center takes appropriate precautions to prepare and serve safe meals and snacks for participants with food allergies. Procedures are in place to:</p>				
<p>a. develop a food allergy action plan for each participant with a life-threatening food allergy;</p>				
<p>b. check ingredients for all foods served to participants with food allergies;</p>				
<p>c. designate an area in the kitchen for allergen-free meals, and use separate equipment and utensils during preparation, cooking, and serving;</p>				

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Part A – Federal and State Requirements	Full	Partial	None	Not known
d. implement cleaning procedures to prevent cross-contact of possible allergens; and				
e. provide annual and ongoing training for staff, including management of participants with life-threatening food allergies and administration of epinephrine autoinjectors.				
8. The adult day care center maintains current nutrition information for foods and beverages served in reimbursable meals and snacks. This nutrition information is available to participants and their guardians/caregivers, medical professionals, and others as needed. For more information, refer to “Nutrition Information” in section 2 of the CSDE’s <u>Guide to Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program</u> .				

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Part B – Team Approach	Full	Partial	None	Not known
9. The adult day care center 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, nurse, registered dietitian, disability coordinator, and other individuals with relevant experience.				
10. The team develops the adult day care center’s policy and procedures for meal modifications and communicates this information to participants and their guardians/caregivers and center staff.				

Part C – Written Policy and Procedures	Full	Partial	None	Not known
11. The adult day care center has a written plan 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 for Adult Day Care Centers in the Child and Adult Care Food Program and visit the “ Policy for Meal Modifications ” section of the CSDE’s Special Diets in the Child and Adult Care Food Program webpage.				

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Part C – Written Policy and Procedures	Full	Partial	None	Not known
12. The adult day care center has a written SOP for meal modifications in the CACFP. For more information, refer to the CSDE’s <u>Sample Standard Operating Procedure (SOP) for Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program.</u>				
13. The adult day care center has written SOPs for other meal modification procedures applicable to the program’s specific needs.				
a. The adult day care center has a written SOP for preparing foods for different types of special diets, e.g., texture modifications, food allergies, celiac disease, and diabetes.				
b. The adult day care center has a written SOP for reviewing menus, reading food labels, and making nutrition information available to participants, guardians/caregivers, and others as needed.				
c. The adult day care center has a written SOP for cleaning to prevent cross-contact of possible food allergens.				
d. The adult day care center has a written SOP for handwashing to prevent cross-contact of possible food allergens.				
e. The adult day care center has a written SOP for ensuring that food service staff and center staff regularly communicate and collaborate regarding the planning and implementation of meal modifications for disability reasons.				

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Part C – Written Policy and Procedures	Full	Partial	None	Not known
f. The adult day care center has a written SOP for obtaining consultation services (such as a registered dietitian), as needed, to plan and prepare modifications for disability reasons.				
g. The adult day care center has a written SOP for training for all staff and substitutes involved with preparing and serving modified meals and snacks.				
<p>14. Adult day care centers with 15 or more employees: The adult day care center 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 for Adult Day Care Centers in the Child and Adult Care Food Program.</p>				
<p>15. Adult day care centers with 15 or more employees: As required by USDA regulations 7 CFR 15b.25 and 7 CFR 15b.6(b), the adult day care center 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 for Adult Day Care Centers in the Child and Adult Care Food Program.</p>				

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Part D – Communication	Full	Partial	None	Not known
16. The adult day care center regularly communicates with all food service and applicable center staff regarding the requirements for meal modifications, the meal modifications policy and SOPs, and the individual accommodations for each participant whose disability requires a meal modification.				
17. The adult day care center regularly communicates with participants or their guardians/caregivers regarding meal modifications.				
a. Communication includes the adult day care center’s policy and SOPs for managing meal modifications for disability reasons.				
b. Communication includes procedures for parents/guardians to request meal modifications for disability reasons, including how to complete the medical statement (refer to items 2 and 3).				
c. Communication includes procedures for managing life-threatening food allergies, including the food allergy management plan (refer to item 7a).				
d. Communication includes procedures for participants or their guardians/caregivers, medical professionals, and other applicable individuals to obtain nutrition information for reimbursable meals and snacks (refer to item 8).				
e. Communication includes procedural rights for grievance procedures (refer to item 15).				

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Part D – Communication	Full	Partial	None	Not known
<p>18. The adult day care center’s policy and SOPs for meal modifications are posted on the adult day care center’s website and shared with participants and guardians/caregivers through a variety of communication channels, such as program handbooks, newsletters, emails, handouts, menu backs, bulletin boards and displays, meetings, center events, and public service announcements.</p>				

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Part E – Professional Development	Full	Partial	None	Not known
19. Food service staff receive professional development on accommodating special diets at least annually.				
a. Professional development for food service staff includes training on the USDA requirements for meal modifications and documentation, i.e., medical statement, IEP, or Section 504 Plan (refer to items 1-3).				
b. Professional development for food service staff includes training on the types of special diets and required modifications for menus and recipes.				
c. Professional development for food service staff includes training on how to read food labels for nutrition information and ingredients.				
d. Professional development for food service staff includes training on cleaning and handwashing procedures to prevent cross-contact of possible food allergens.				
e. Professional development for food service staff includes training on planning, preparing, and serving appropriate and safe reimbursable meals and snacks.				
f. Professional development for food service staff includes training on how to implement the adult day care center’s policy and SOPs for meal modifications (refer to items 11-13).				

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Part E – Professional Development	Full	Partial	None	Not known
g. Professional development for food service staff includes training on procedures for maintaining the confidentiality of each participant’s medical condition during the meal service (refer to item 4).				
20. Other adult day care center staff receive professional development about meal modifications, as appropriate to their job responsibilities, e.g., administrators and other center staff.				

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Part F – Monitoring and Review	Full	Partial	None	Not known
21. The adult day care center 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.				
22. The adult day care center implements monitoring procedures to ensure that meal modifications are reasonable, appropriate, and meet each participant's dietary needs. Any issues or concerns are promptly addressed.				
23. The adult day care center reviews the policy and SOPs for meal modifications at least annually, and makes necessary adjustments based on feedback, regulatory changes, local policies, and best practices.				

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Step 2 — Prioritize 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.

Step 3 — Develop 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 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

[CACFP Adult Meal Patterns](#) (CSDE's Meal Patterns for the Child and Adult Care Food Program webpage):

<https://portal.ct.gov/sde/nutrition/meal-patterns-for-the-child-and-adult-care-food-program#AdultMealPatterns>

[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\(g\)\(1\)](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\(g\)\(3\)](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

[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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[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>

[Offering Lactose-Free and Lactose-Reduced Milk in the Child and Adult Care Food Program](#) (CSDE):

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

[Overview 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/overview_meal_modifications_cacfp_adults.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 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

[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

[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>

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[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.fns.usda.gov/modifications-accommodate-disabilities-cacfp-and-sfsp)

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

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

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

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/assessment_meal_modifications_cacfp_adults.pdf.



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To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: <https://www.usda.gov/sites/default/files/documents/ad-3027.pdf>, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

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