

Overview of the Requirements for Meal Modifications for Adult Participants in the Child and Adult Care Food Program

This document summarizes the U.S. Department of Agriculture’s (USDA) requirements for meal modifications for adult participants in the Child and Adult Care Food Program (CACFP). These requirements apply to all adult day care centers that participate in the CACFP. For detailed guidance, refer to the Connecticut State Department of Education’s (CSDE) [Guide to Meal Modifications for CACFP Adult Day Care Centers](#) and visit the CSDE’s [Special Diets in CACFP Adult Day Care Centers](#) webpage.



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The requirements for meal modifications for participants in the CACFP are defined by the USDA's nondiscrimination regulations ([7 CFR 15b](#)) and CACFP regulations ([7 CFR 226.20\(g\)](#)). These regulations outline the required modifications for participants whose disability restricts their diet (disability reasons) and the optional modifications for participants who do not have a disability but have other special dietary needs (non-disability reasons). The different requirements for disability and non-disability meal modifications are summarized below.

Required Meal Modifications for Disability Reasons

The USDA requires that adult day care centers must 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 or registered dietitian. Meal modifications must be related to the disability or limitations caused by the disability.

- A **reasonable modification** is a change or alteration in policies, practices, and/or procedures to accommodate a disability that ensures participants with disabilities have equal opportunity to participate in or benefit from a program. The general guideline in making a reasonable modification is that participants with disabilities must be able to participate in and receive benefits from programs that are available to participants without disabilities.
- **Case-by-case basis** means that the meal modifications are specific to the individual medical condition and dietary needs of each participant, based on the specific information provided by the state licensed healthcare professional or registered dietitian in the participant's medical statement or, if applicable, the participant's Section 504 plan.
- A **state licensed healthcare professional** is an individual who is authorized to write medical prescriptions under state law. The Connecticut State Department of Public Health (DPH) defines these individuals as physicians (MD), physician assistants (PA) and certified physician assistants (PAC), doctors of osteopathy (DO), and advanced practice registered nurses (APRN).
- A **registered dietitian** (RD) or registered dietitian nutritionist (RDN) is an individual with a minimum of a graduate degree from an accredited dietetics program and who completed a supervised practice requirement, passed a national exam, and completes continuing professional educational requirements to maintain registration. For more information, visit the Academy of Nutrition and Dietetics' (AND) [Registered Dietitian Nutritionist Fact Sheet](#) website.

For detailed guidance on the meal modification requirements for disability reasons, refer to section 2 of the CSDE's [Guide to Meal Modifications for CACFP Adult Day Care Centers](#).

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Optional Meal Modifications for Non-disability Reasons

Adult day care centers may choose to make optional 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 participant's preference for gluten-free foods, organic foods, or almond milk because they believe these foods are healthier.

The requirements for optional meal modifications for non-disability reasons depend on whether they are within or outside the CACFP adult meal patterns.

- **Modifications within the CACFP adult meal patterns:** Meal modifications are within the CACFP adult meal patterns if they are only modified for texture (such as chopped, ground, or pureed foods) or they 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 the adult day care center and the participant or their guardian/caregiver regarding the appropriate meal modifications for the participant. For information on the CACFP adult meal patterns, visit the "[CACFP Adult Meal Patterns](#)" section of the CSDE's [Meal Patterns for CACFP Adult Day Care Centers](#) webpage.
- **Modifications outside the CACFP adult meal patterns:** Meal modifications are outside the CACFP adult meal patterns if they include noncreditable foods. Noncreditable foods are foods and beverages that do not meet the CACFP adult meal pattern requirements for reimbursable meals and snacks. 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 CACFP adult meal patterns require a medical statement signed by a state licensed healthcare professional or registered dietitian. For information on noncreditable foods, refer to the CSDE's resource, [Noncreditable Foods for Adult Day Care Centers in the Child and Adult Care Food Program](#).

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

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Optional Fluid Milk Substitutes for Non-disability Reasons

Fluid milk substitutes are plant-based beverages designed to replace cow's milk, such as soy milk, almond milk, rice milk, and oat milk. Adult day care centers may choose to offer one or more allowable fluid milk substitutes for participants who do not consume regular cow's milk for non-disability reasons. All fluid milk substitutes for non-disability reasons must meet the USDA's nutrition standards for fluid milk substitutes.

These substitutions require a written request that identifies the reason for the milk substitute. This written request must be from the participant, their guardian/caregiver, a state licensed healthcare professional, or a registered dietitian.

For detailed guidance on the requirements for fluid milk substitutes, refer to the CSDE's resources, [Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult 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](#).

Required Meal Modification Documentation for Disability Reasons

Meal modifications for disability reasons that are outside the CACFP adult meal patterns require a medical statement signed by a state licensed healthcare professional or registered dietitian. The medical statement must include the three elements below.

1. Information about the participant's physical or mental impairment that is sufficient to allow the adult day care center to understand how it restricts the participant's diet.
2. An explanation of what must be done to accommodate the participant's disability.
3. If appropriate, the food or foods to be omitted and recommended alternatives.

In some cases, more information may be required. For example, if the participant requires caloric modifications or the substitution of a liquid nutritive formula to accommodate a disability, the state licensed healthcare professional or registered dietitian should include this information in the medical statement.

Medical information in 504 plan

Adult day care centers are not required to obtain a separate medical statement if the participant has a 504 plan that includes the three required elements, or the adult day care center obtains the required information during the development or review of the participant's 504 plan.

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Medical information in doctor's note or electronic medical statements

Acceptable documentation for meal modifications includes any written or electronic statement that includes the three required elements and is signed by a state licensed healthcare professional or registered dietitian. Examples include a doctor's note and medical statements with electronic signatures. Adult day care centers are not required to obtain a separate medical statement when an alternate written or electronic statement provides the required information.

Determining if a Meal Modification is Required

Adult day care centers can determine if a participant requires a meal modification by reviewing question 1 in section B of the CSDE's medical statement form, *Medical Statement for Meal Modifications for Adult Participants in the Child and Adult Care Food Program*. This question asks the state licensed healthcare professional or registered dietitian to indicate if the participant has a physical or mental impairment that restricts their diet.

- If the answer is "yes," the adult day care center must make a reasonable meal modification.
- If the answer is "no," the adult day care center may choose to make a reasonable meal modification.

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 Adult Day Care Centers](#) webpage.



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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

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)(2): Variations for non-disability reasons (USDA):

[https://www.ecfr.gov/current/title-7/part-226#p-226.20\(g\)\(2\)](https://www.ecfr.gov/current/title-7/part-226#p-226.20(g)(2))

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 CACFP Adult Day Care Centers (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 Child and Adult Care Food Program (CSDE):

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

Medical Statements (“Documents/Forms” section of CSDE’s Special Diets in CACFP Adult Day Care Centers webpage)

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

Sample Standard Operating Procedure (SOP) for Meal Modifications in 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 CACFP Adult Day Care Centers (CSDE):

<https://portal.ct.gov/sde/nutrition/special-diets-in-cacfp-adult-day-care-centers>

Summary Charts of the Requirements for Meal Modifications in CACFP Adult Day Care Centers (CSDE):

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

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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>

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For more information, visit the CSDE's [Special Diets in CACFP Adult Day Care Centers](#) 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/overview_meal_modifications_cacfp_adults.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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