

Summary of Requirements for Meal Modifications in Child and Adult Care Food Program (CACFP) Child Care Programs

This document summarizes the requirements for meal modifications for children in the U.S. Department of Agriculture's (USDA) [CACFP](#). These requirements apply to all CACFP child care facilities, including child care centers, at-risk afterschool care centers, emergency shelters, and family day care homes.

Required modifications for children whose disability restricts their diet

The USDA's nondiscrimination regulations ([7 CFR 15b](#)) and CACFP regulations ([7 CFR 226.20\(g\)](#)) require reasonable meal modifications for children whose disability restricts their diet, based on written documentation from a recognized medical authority. A recognized medical authority is a state-licensed healthcare professional authorized to write medical prescriptions under state law, i.e., physicians (MD), physician assistants (PA) and certified physician assistants (PAC), doctors of osteopathy (DO), and advanced practice registered nurses (APRN). For guidance on the meal modification requirements for children with a disability, 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.

Under the [Americans with Disabilities \(ADA\) Amendments Act of 2008](#), most physical and mental impairments will constitute a disability. This includes conditions that impair immune, digestive, neurological, and bowel functions, as well as many others. A physical or mental impairment does not need to be life threatening to constitute a disability. If a recognized medical authority determines that food intolerance is a disability for a particular child, the school food authority (SFA) must make a reasonable meal modification based on the medical statement.

Optional modifications for children without a disability

CACFP facilities may choose to make optional modifications within the CACFP meal patterns on a case-by-case basis for children whose dietary restrictions are not related to a disability. A medical statement is required if these optional modifications are outside the school meal patterns. For information on the CACFP meal patterns, visit the CSDE's [Meal Patterns for CACFP Child Care Programs](#) webpage and review the CSDE's [Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs](#).

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Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	Medical statement must include
Child is determined to have a disability (physical or mental impairment) under Section 504, and the disability restricts the child's diet	Section 504 meeting	<ul style="list-style-type: none"> • 504 plan and Individualized Health Care Plan (IHCP) • May also have an Emergency Care Plan (ECP) depending on child's medical condition 	Medical conditions that substantially limit a major life activity and affect the child's diet, for example: <ul style="list-style-type: none"> • metabolic diseases, such as diabetes or phenylketonuria (PKU) • food anaphylaxis (life-threatening food allergy) 	Yes	Medical statement signed by recognized medical authority (or 504 plan, if applicable)	<ul style="list-style-type: none"> • Information about how the child's physical or mental impairment restricts the child's diet. • An explanation of what must be done to accommodate the child. • The food or foods to be omitted and recommended alternatives, if appropriate.
Child is determined to have a disability (physical or mental impairment) under the Individuals with Disabilities Education Act (IDEA), and the disability restricts the child's diet	Planning and Placement Team (PPT) Meeting	<ul style="list-style-type: none"> • Individualized Education Program (IEP) and IHCP • May also have an ECP depending on child's medical condition 	Medical conditions that meet the IDEA recognized disability categories, require related services under IDEA, and affect the child's diet, for example: <ul style="list-style-type: none"> • autism • traumatic brain injury other health impairment, e.g., heart condition and diabetes	Yes	Medical statement signed by recognized medical authority (or IEP, if applicable)	<ul style="list-style-type: none"> • Information about how the child's physical or mental impairment restricts the child's diet. • An explanation of what must be done to accommodate the child. • The food or foods to be omitted and recommended alternatives, if appropriate.

¹ These examples of medical conditions are not all-inclusive and might not require meal modifications for all children. The determination of whether a child has a physical or mental impairment that restricts their diet must be made on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

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Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	Medical statement must include
Child is not determined to have a disability (physical or mental impairment) under Section 504 or IDEA, but the child's medical condition meets the definition of disability under the ADA Amendments Act and the disability restricts the child's diet	Recognized medical authority	<ul style="list-style-type: none"> • IHCP • May also have an ECP depending on child's medical condition 	<p>Medical conditions that do not qualify for a disability under Section 504 or IDEA, but may meet the definition of disability under the ADA Amendments Act (i.e., any condition that substantially limits a child's major life activity), for example:</p> <ul style="list-style-type: none"> • celiac disease • gluten intolerance • lactose intolerance • non-life-threatening food allergies • obesity • certain temporary disabilities <p>Note: Not all conditions require meal modifications for all children.</p>	Yes	Medical statement signed by recognized medical authority	<ul style="list-style-type: none"> • Information about how the child's physical or mental impairment restricts the child's diet. • An explanation of what must be done to accommodate the child. • The food or foods to be omitted and recommended alternatives, if appropriate.

¹ These examples of medical conditions are not all-inclusive and might not require meal modifications for all children. The determination of whether a child has a physical or mental impairment that restricts their diet must be made on a case-by-case basis, i.e., specific to the individual medical condition and dietary needs of each child.

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Scenario	Determination of disability	Plan on file	Examples of medical conditions ¹	Modification required?	Required documentation	Medical statement must include
Personal food preferences	Not applicable	Not applicable	Not applicable	No ^{2, 3}	Not applicable	Not applicable
Vegetarianism	Not applicable	Not applicable	Not applicable	No ^{2, 3}	Not applicable	Not applicable
Religion	Not applicable	Not applicable	Not applicable	No ^{2, 3}	Not applicable	Not applicable

- ¹ CACFP facilities are not required to make meal modifications for children whose dietary restrictions are not related to a disability, such as individual food preferences, general health concerns, and religious, ethnic, and moral reasons. CACFP facilities may choose to make these optional modifications on a case-by-case basis. A medical statement is not required for optional modifications within the meal patterns. A medical statement is required for optional modifications outside the meal patterns.
- ² CACFP facilities may choose to offer one or more allowable milk substitutes for children whose dietary needs do not constitute a disability. The allowable substitutes include: 1) lactose-reduced or lactose-free milk with the appropriate fat content for each grade group, i.e., low-fat milk and fat-free milk (unflavored or flavored) for grades K-12; whole unflavored milk for age 1; and unflavored low-fat or fat-free milk for ages 2-4; and 2) nondairy milk substitutes that meet the USDA’s nutrition standards for fluid milk substitutes, such as certain brands of soy milk. Nondairy milk substitutes require a written request from the parent or guardian that identifies the medical or other special dietary need that restricts the child’s diet and requires the nondairy milk substitute. For more information, refer to the CSDE’s resource, [*Allowable Milk Substitutes for Children without Disabilities in the CACFP*](#).

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Resources

Allowable Milk Substitutes for Children without Disabilities in the CACFP (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Milk_Substitutes_CACFP.pdf

CSDE Operational Memorandum No. 2C-18 and 2H-18: Requirements for Meal Modifications in CACFP Child Care Programs:

http://portal.ct.gov/-/media/SDE/Nutrition/CACFP/Memos/OM2018/OM02C18_02H18.pdf

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

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Guide_Meal_Modifications_CACFP.pdf

Guide to Meeting the Meal Pattern Requirements for CACFP Child Care Programs (CSDE):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/MealPattern/Guide_CACFP_Meal_Patterns.pdf

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

<http://portal.ct.gov/SDE/Nutrition/Meal-Patterns-CACFP-Child-Care-Programs>

Medical Statements for CACFP Child Care Programs (“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>

Requirements for Meal Modifications in CACFP Child Care Programs (CSDE presentation):

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Meal_Modifications_CACFP_Presentation.pdf

Self-assessment of Child Care Practices for Meal Modifications in the CACFP (CSDE).

https://portal.ct.gov/-/media/SDE/Nutrition/CACFP/SpecDiet/Assessment_Meal_Modifications_CACFP.pdf.

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

<http://portal.ct.gov/SDE/Nutrition/Special-Diets-in-CACFP-Child-Care-Programs>

USDA Memo CACFP 14-2017 and SFSP 10-2017: 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 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/Summary_Chart_Special_Diets_CACFP.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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