

# Summary Charts of the Requirements for Meal Modifications for Adult Participants in the Child and Adult Care Food Program

The charts in this document summarize the meal modification requirements for adult day centers that participate in the U.S. Department of Agriculture's (USDA) Child and Adult Care Food Program (CACFP). For detailed guidance, refer to 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](#) and visit the CSDE's [Special Diets in the Child and Adult Care Food Program](#) webpage.

## Overview of Requirements for Meal Modifications

The requirements for meal modifications for adult 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).

- **Disability reasons:** The USDA requires 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. [Chart 1](#) summarizes the requirements for meal modification requests for disability reasons.
- **Non-disability reasons:** Meal modifications for non-disability reasons are optional. [Chart 2](#) summarizes the requirements for meal modification requests for disability reasons.

For detailed guidance on meal modifications for disability and non-disability reasons, refer to the CSDE's resource, [Overview of the Requirements for Meal Modifications for Adult Participants in the Child and Adult Care Food Program](#) and [Guide to Meal Modifications for CACFP Adult Day Care Centers](#) and visit the CSDE's [Special Diets in the Child and Adult Care Food Program](#) webpage.

## Chart 1: Meal Modification Requests for Disability Reasons

The examples of medical conditions in chart 1 are not all-inclusive and might not require meal modifications for all participants. The determination of whether a participant has a physical or mental impairment that restricts their diet must be made on a case-by-case basis based on a medical statement signed by a state licensed healthcare professional or registered dietitian.

- "Case-by-case basis" means specific to the individual medical condition and dietary needs of each participant, based on the specific information provided by the state licensed healthcare

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professional or registered dietitian in the participant's medical statement or, if applicable, the participant's Section 504 plan or Individualized Education Program (IEP).

- 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).

Type of request	How disability determined	Plan on file	Examples of medical conditions	Required documentation
Participant determined to have disability (physical or mental impairment) under Section 504; disability restricts participant's diet; and required meal modification is outside USDA meal patterns	Section 504 meeting	504 plan and Individualized Health Care Plan (IHCP)  May also have Emergency Care Plan (ECP) depending on participant's medical condition	Medical conditions that substantially limit a major life activity and affect participant's diet  <b>Examples:</b> Metabolic diseases, (e.g., diabetes or phenylketonuria (PKU)) and food anaphylaxis (life-threatening food allergy)	Medical statement signed by state licensed healthcare professional or registered dietitian (or 504 plan, if applicable)  Medical statement must include: 1) information about how participant's physical or mental impairment restricts participant's diet; 2) explanation of what must be done to accommodate participant; and 3) food or foods to be omitted and recommended alternatives, if appropriate

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Type of request	How disability determined	Plan on file	Examples of medical conditions	Required documentation
Participant not determined to have disability (physical or mental impairment) under Section 504, but participant's medical condition meets definition of disability under ADA Amendments Act; disability restricts participant's diet; and required meal modification is outside USDA meal patterns	State licensed healthcare professional or registered dietitian	IHCP  May also have ECP depending on participant's medical condition	Medical conditions that do not qualify for disability under Section 504 or IDEA but may meet definition of disability under ADA Amendments Act (i.e., any condition that substantially limits participant's major life activity)  <b>Examples:</b> Celiac disease, gluten intolerance, lactose intolerance, non-life-threatening food allergies, obesity, and certain temporary disabilities	Medical statement signed by state licensed healthcare professional or registered dietitian (or 504 plan, if applicable)  Medical statement must include: 1) information about how participant's physical or mental impairment restricts participant's diet; 2) explanation of what must be done to accommodate participant; and 3) food or foods to be omitted and recommended alternatives, if appropriate

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## Chart 2: Meal Modification Requests for Non-disability Reasons

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

- 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 they only 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 participant. [Chart 1](#) summarizes the requirements for meal modification requests for disability reasons.
- 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 meal pattern requirements for reimbursable meals and snacks (refer to the CSDE's resource, [Noncreditable Foods in the Meal Patterns for the Child and Adult Care Food Program](#)). Examples include entrees that do not meet the crediting requirements for the [meats/meat alternates component](#) milk substitutes that do not meet the USDA's nutrition standards for fluid milk substitutes. 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.

Type of request	Required documentation for meals outside the USDA meal pattern	Required documentation for meals within the USDA meal pattern
Personal food preferences, e.g., gluten-free foods, organic foods	Medical statement signed by state licensed healthcare professional or registered dietitian that indicates: 1) information about how participant's personal food preferences restrict participant's diet; 2) explanation of what must be done to accommodate participant; and 3) food or foods to be omitted and recommended alternatives, if appropriate	None

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Type of request	Required documentation for meals outside the USDA meal pattern	Required documentation for meals within the USDA meal pattern
Nondairy milk substitutes that do not meet the <a href="#">USDA's nutrition standards for fluid milk substitutes</a> , e.g., almond milk and rice milk	Medical statement signed by state licensed healthcare professional or registered dietitian that indicates: 1) information about how participant's personal food preferences restrict participant's diet; 2) explanation of what must be done to accommodate participant; and 3) type of milk to be omitted and recommended alternatives, if appropriate	Not applicable: Nondairy milk substitutes for non-disability reasons must meet <a href="#">USDA's nutrition standards for fluid milk substitutes</a>  CSDE resource: <a href="#">Allowable Fluid Milk Substitutes for Non-disability Reasons for Adult Participants in the Child and Adult Care Food Program</a>
Vegetarian diets, e.g., flexitarian, pescatarian, lacto-ovo-vegetarian, and vegan	Medical statement signed by state licensed healthcare professional or registered dietitian that indicates: 1) information about how participant's personal food preferences restrict participant's diet; 2) explanation of what must be done to accommodate participant; and 3) food or foods to be omitted and recommended alternatives, if appropriate	None
Religious or moral convictions	Medical statement signed by state licensed healthcare professional or registered dietitian that indicates: 1) information about how participant's religious or moral convictions restrict participant's diet; 2) explanation of what must be done to accommodate participant; and 3) food or foods to be omitted and recommended alternatives, if appropriate	None

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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](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](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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/identify_allowable_nondairy_milk_substitutes_cacfp.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>

[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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/overview_meal_modifications_cacfp_adults.pdf)

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[Sample Standard Operating Procedure \(SOP\) for Meal Modifications for Adult Day Care Centers in the Child and Adult Care Food Program](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp.docx) (CSDE):

[https://portal.ct.gov/-](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp.docx)

[/media/sde/nutrition/cacfp/specdiet/sample\\_sop\\_meal\\_modifications\\_cacfp.docx](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/sample_sop_meal_modifications_cacfp.docx)

[Self-assessment of Adult Day Care Center Practices for Meal Modifications in the Child and Adult Care Food Program](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/assessment_meal_modifications_cacfp_adults.pdf) (CSDE):

[https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/assessment\\_meal\\_](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/assessment_meal_modifications_cacfp_adults.pdf)

[modifications\\_cacfp\\_adults.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/assessment_meal_modifications_cacfp_adults.pdf)

[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](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/summary_chart_meal_modifications_cacfp_adults.pdf) 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\\_meal\\_modifications\\_cacfp\\_adults.pdf](https://portal.ct.gov/-/media/sde/nutrition/cacfp/specdiet/summary_chart_meal_modifications_cacfp_adults.pdf).



# Summary Charts of the Requirements for Meal Modifications for Adult Participants in the CACFP

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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](mailto:program.intake@usda.gov)

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