Self-assessment of Local Practices for Meal Modifications in the School Nutrition Programs

This tool is intended to help local educational agencies (LEAs) assess their current practices for meal modifications in the U.S. Department of Agriculture's (USDA) school nutrition programs and identify areas in need of improvement. The school nutrition programs include the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program (ASP) of the NSLP, Seamless Summer Option (SSO) of the NSLP, Special Milk Program (SMP), Fresh Fruit and Vegetable Program (FFVP), and Child and Adult Care Food Program (CACFP) At-risk Supper Program implemented in schools.

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Required Modifications for Disability Reasons

The USDA's nondiscrimination regulations (7 CFR 15b) and school nutrition program regulations (7 CFR 210.10(m) and 7 CFR 220.8(m)) require school food authorities (SFAs) 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 the School Nutrition Programs*. Additional resources and medical statement forms are available on the CSDE's Special Diets in School Nutrition Programs webpage.

Optional Modifications for Non-disability Reasons

SFAs have the option to make meal modifications within or outside the school 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.

- **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 afterschool snacks (refer to the "Noncreditable Foods" section of the CSDE's Crediting Foods in School Nutrition Programs 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 patterns require a medical statement signed by a state licensed healthcare professional or registered dietitian.

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For guidance on optional meal modifications for non-disability reasons, refer to section 3 of the CSDE's *Guide to Meal Modifications in the School Nutrition Programs*.

Step 1 — Assessment

Check the appropriate box to indicate if each practice is fully implemented, partially implemented, or not implemented by the LEA. Refer to the LEA's policies, guidelines, and standard operating procedures (SOPs) for special diets and meal modifications, including the LEA's food allergy management plan. Check "Not known" if additional information is needed to determine whether the LEA implements the practice.

Part A — Federal and State Requirements	Full	Partial	None	Not known
1. The LEA complies with the following federal requirements for meal modifications: the USDA regulations for reimbursable meals (7 CFR 210.10(d)(2), 7 CFR 210.10(m)(1), and 7 CFR 210.10(m)(2)); the USDA nondiscrimination regulations (7 CFR 15b); Section 504 of the Rehabilitation Act of 1973; the Individuals with Disabilities Education Act (IDEA); 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 in the School Nutrition Programs.*				

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Part A — Federal and State Requirements	Full	Partial	None	Not known
2. The LEA 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 "Medical Statements" section of the CSDE's Special Diets in School Nutrition Programs webpage.				
3. The LEA 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).				
4. When identifying children during the meal service who require modified meals and afterschool snacks for disability reasons, the LEA implements policies and practices that protect children's privacy and maintain confidentiality of each child's medical condition. For more information, refer to "Identifying Students" in section 2 of the CSDE's *Guide to Meal Modifications in the School Nutrition Programs.*				

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Part A — Federal and State Requirements	Full	Partial	None	Not known
5. Optional meal modifications for non-disability reasons meet the USDA's meal patterns for school nutrition programs 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.				
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 210.10(d)(2)(ii) of the NSLP regulations. Fluid milk substitutes 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 the School Nutrition Programs* and the CSDE's resource, *Allowable Fluid Milk Substitutes for Non-disability Reasons in the School Nutrition Programs* and *Identifying Products that Meet the USDA's Nutrition Standards for Fluid Milk Substitutes in the School Nutrition Programs*.				

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Part A — Federal and State Requirements	Full	Partial	None	Not known
7. The LEA takes appropriate precautions to prepare and serve safe meals and afterschool snacks for children with food allergies.				
a. Procedures are in place to develop a food allergy action plan for each child with a life-threatening food allergy.				
b. Procedures are in place to check ingredients for all foods served to children with food allergies.				
c. Procedures are in place to designate an area in the kitchen for allergen-free meals, and use separate equipment and utensils during preparation, cooking, and serving.				
d. Procedures are in place to implement cleaning procedures to prevent cross-contact of possible allergens.				
e. As required by C.G.S. Section 10-212c, procedures are in place to provide annual and ongoing training for staff, including management of children with life-threatening food allergies and administration of epinephrine autoinjectors.				
8. The school food service department maintains current nutrition information for foods and beverages served in reimbursable meals and afterschool snacks. This nutrition information is available to students, families, school nurses, and others as needed. For more information, refer to "Nutrition Information" in section 2 of the CSDE's *Guide to Meal Modifications in the School Nutrition Programs*.				

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Part B — Team Approach	Full	Partial	None	Not known
9. The LEA includes an interdisciplinary team of appropriate personnel in the planning and implementation of meal modifications for disability reasons. Examples of team members include school food service staff, school administrators, school nurse, Section 504 team members, registered dietitian, and other school staff with relevant experience.				
10. The team develops the LEA's policy and procedures for meal modifications and communicates this information to parents/guardians, students, and school staff.				

Part C — Written Policy and Procedures	Full	Partial	None	Not known
11. The LEA has a written plan for the management of students with life-threatening food allergies, as required by C.G.S. Section 10-212c. For more information, refer to the CSDE's *Guidelines for Managing Life-threatening Food Allergies in Connecticut Schools*.				
12. The LEA has a written policy addressing the requirements and procedures for meal modifications in the school nutrition programs. For more information, refer to section 4 of the CSDE's *Guide to Meal Modifications in the School Nutrition Programs* and visit the "Policy for Meal Modifications" section of the CSDE's Special Diets in School Nutrition Programs webpage.				

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Part C — Written Policy and Procedures	Full	Partial	None	Not known
13. The LEA has a written SOP for meal modifications in the school nutrition programs. For more information, refer to the CSDE's *Sample Standard Operating Procedure (SOP) for Meal Modifications in the School Nutrition Programs*.				
14. The LEA has written SOPs for other meal modification procedures applicable to the LEA's specific needs.				
a. The LEA 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 LEA has a written SOP for reviewing menus, reading food labels, and making nutrition information available to students, families, school nurses, and others as needed.				
c. The LEA has a written SOP for cleaning to prevent cross-contact of possible food allergens.				
d. The LEA has a written SOP for handwashing to prevent cross-contact of possible food allergens.				
e. The LEA has a written SOP for ensuring that school food service staff, school nurses, and other appropriate school staff (e.g., registered dietitian, cafeteria aides, teachers, teachers' aides, and administrators), 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 LEA 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 LEA has a written SOP for training for all staff and substitutes involved with preparing and serving modified meals and afterschool snacks.				
15. **LEAs with 15 or more employees:** The LEA 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 for the school in general and may also be responsible for ensuring compliance with meal modifications for disability reasons. For more information, refer the CSDE's resource, *Requirements for Procedural Safeguards for Meal Modifications in School Nutrition Programs*.				
16. As required by USDA regulations 7 CFR 15b.25 and 7 CFR 15b.6(b), the LEA has a written procedural safeguards process that notifies parents/guardians of the process for requesting meal modifications for disability reasons and arranges for an impartial hearing process to resolve grievances related to these requests. For more information, refer the CSDE's resource, *Requirements for Procedural Safeguards for Meal Modifications in School Nutrition Programs*.				

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Part D — Communication	Full	Partial	None	Not known
17. The school health services department regularly communicates with all school nurses regarding the requirements for meal modifications, the LEA's policy and SOPs, and the individual accommodations for each child whose disability requires a meal modification.				
18. School nurses regularly communicate with the food service director and cafeteria managers regarding the individual accommodations for each child whose disability requires a meal modification.				
19. The food service director and cafeteria managers regularly communicate with all school food service staff regarding the requirements for meal modifications, the LEA's policy and SOPs, and the individual accommodations for each child whose disability requires a meal modification.				
20. The LEA regularly communicates with parents/guardians regarding meal modifications for children:				
a. Communication includes the LEA'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 (item 11).				

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Part D — Communication	Full	Partial	None	Not known
d. Communication includes procedures for students, parents/guardians, medical professionals, and other applicable individuals to obtain nutrition information for reimbursable meals and afterschool snacks (item 8).				
e. Communication includes procedural rights for grievance procedures (item 16).				
21. The LEA's policy and SOPs for meal modifications are posted on the LEA's website and shared with students and parents/guardians through a variety of communication channels, such as parent and student handbooks, newsletters, emails, handouts, menu backs, bulletin boards and displays, meetings, school events, and public service announcements.				
22. As required by C.G.S. Section 10-212, the LEA's allergy management plan for children with life-threatening food allergies is available publicly via the district's website, individual school's website, or other appropriate means if a website does not exist.				

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Part E — Professional Development	Full	Partial	None	Not known
23. School food service staff receive professional development on accommodating special diets at least annually.				
a. Professional development for school 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 school food service staff includes training on types of special diets and required modifications for menus and recipes.				
c. Professional development for school food service staff includes training on how to read food labels for nutrition information and ingredients.				
d. Professional development for school food service staff includes training on cleaning and handwashing procedures to prevent cross-contact of possible food allergens.				
e. Professional development for school food service staff includes training on planning, preparing, and serving appropriate and safe reimbursable meals and afterschool snacks.				
f. Professional development for school food service staff includes training on how to implement the LEA's policy and SOPs for meal modifications (refer to items 11-14).				

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Part E — Professional Development	Full	Partial	None	Not known
g. Professional development for school food service staff includes training on procedures for maintaining the confidentiality of each child's medical condition during the meal service (item 4).				
24. School nurses receive ongoing professional development on accommodating special diets.				
25. Professional development for school nurses includes training on relevant topics for complying with the federal requirements for meal modifications.				
a. Professional development for school nurses includes training on the USDA requirements for meal modifications and documentation (refer to items 1-3).				
b. Professional development for school nurses includes training on medical diagnoses and management of special diets.				
c. Professional development for school nurses includes training on how to implement the LEA's policy and SOPs for meal modifications (refer to items 11-14).				
26. Other school personnel receive professional development as appropriate to their job responsibilities, e.g., cafeteria aides, teachers, teacher's aides, bus drivers, and other school staff.				

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Part F — Monitoring and Review	Full	Partial	None	Not known
27. The LEA implements monitoring procedures and conducts periodic reviews to ensure that each school consistently follows the LEA's policy and SOPs for meal modifications. Any issues or concerns are promptly addressed.				
28. The LEA 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.				
29. The LEA reviews the policy and SOPs for meal modifications at least annually, and makes necessary adjustments based on feedback, regulatory changes, school 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 District Policy for Meal Modifications in the School Nutrition Programs* and *Sample Action Plan: Promoting District Policy for Meal Modifications in the School Nutrition Programs*.

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Resources

Accommodating Children with Disabilities in the School Meal Programs: Guidance for School Food Service Professionals (USDA):
https://www.fns.usda.gov/cn/2017-edition-accommodating-children-disabilities-school-meal-programs

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 in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/milk_substitutes_snp.pdf

CSDE Operational Memo No. 13-17: Requirements for Meal Modifications in the School Nutrition Programs:
https://portal.ct.gov/-/media/sde/nutrition/nslp/memos/om2017/om13-17.pdf

Guide to Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/guide_meal_modifications_snp.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

Meal Patterns for Grades K-12 in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/meal-patterns-school-nutrition-programs

Meal Patterns for Preschoolers in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/meal-patterns-preschoolers-in-school-nutrition-programs

Medical Statement for Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/medical_statement_snp.docx

Milk Substitutes for Non-disability Reasons (CSDE's Special Diets in School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs/milk-substitutes-for-non-disability-reasons

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NSLP Regulations (7 CFR 210):
https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-210

NSLP regulations 7 CFR 210.10(d)(2): Fluid milk substitutes for non-disability reasons (USDA):
https://www.ecfr.gov/current/title-7/part-210#p-210.10(d)(2)

NSLP regulations 7 CFR 210.10(m)(1): Modifications for disability reasons (USDA):
https://www.ecfr.gov/current/title-7/part-210#p-210.10(m)(1)

NSLP regulations 7 CFR 210.10(m)(2): Variations for non-disability reason (USDA):
https://www.ecfr.gov/current/title-7/part-210#p-210.10(m)(2)

Overview of the Requirements for Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/overview_meal_modifications_snp.pdf

Requirements for Procedural Safeguards for Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/procedural_safeguards_snp.pdf

Sample Action Plan: Developing District Policy for Meal Modifications in School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/action_policy_meal_modifications_snp.pdf

Sample Action Plan: Promoting District Policy for Meal Modifications in School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/action_promote_meal_modifications_snp.pdf

Sample Standard Operating Procedure (SOP) for Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/sample_sop_meal_modifications_snp.docx

SBP Regulations (7 CFR 220):
https://www.ecfr.gov/current/title-7/subtitle-B/chapter-II/subchapter-A/part-220

SBP regulations 7 CFR 220.8(m): Modifications and variations in reimbursable meals:
https://www.ecfr.gov/current/title-7/part-220#p-220.8(m)

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Special Diets in School Nutrition Programs (CSDE webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs

Summary Charts of the Requirements for Meal Modifications in the School Nutrition Programs (CSDE):
https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/summary_chart_meal_modifications_snp.pdf

USDA Final Rule: Fluid Milk Substitutions in the School Nutrition Programs (73 FR 52903):
https://www.fns.usda.gov/school-meals/fr-091208

USDA Memo SP 01-2026: Whole Milk for Healthy Kids Act of 2025 – Implementation Requirements for the National School Lunch Program:
https://www.fns.usda.gov/nslp/wmfhka-implementation

USDA Memo SP 26-2017: Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As):
https://www.fns.usda.gov/cn/accommodating-disabilities-school-meal-programs-guidance-qas

USDA Memo SP 59-2016: Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs:
https://www.fns.usda.gov/policy-memorandum-modifications-accommodate-disabilities-school-meal-programs

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

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For more information, visit the CSDE's Special Diets in School Nutrition Programs webpage or contact the school nutrition programs 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/nslp/specdiet/summary_chart_meal_modifications_snp.pdf.

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Self-assessment of Local Practices for Meal Modifications in the School Nutrition Programs

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Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

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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