Overview of the Requirements for Meal Modifications in the School Nutrition Programs

This document summarizes the U.S. Department of Agriculture's (USDA) requirements for meal modifications in public schools, private schools, and residential child care institutions (RCCIs) that participate in the school nutrition programs. 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. For detailed guidance, refer to the CSDE's *Guide to Meal Modifications in School Nutrition Programs* and visit the CSDE's Special Diets in School Nutrition Programs webpage.

Contents

Required Meal Modifications for Disability Reasons 2
Optional Meal Modifications for Non-disability Reasons 3
Optional Fluid Milk Substitutes (Nondairy Beverages) for Non-disability Reasons 4
Documentation for fluid milk substitutes 5
Required Meal Modification Documentation for Disability Reasons 6
Medical information in Individualized Education Program (IEP) or 504 plan 6
Medical information in doctor's note or electronic medical statements 6
Determining if Meal Modifications are Required 6
Procedural Safeguards 7
Resources 7



Overview of the Requirements for Meal Modifications in the School Nutrition Programs

The requirements for meal modifications for children participating in the school nutrition programs are defined by the USDA's nondiscrimination regulations (7 CFR 15b) and school nutrition program regulations (7 CFR 210.10(m) and 7 CFR 220.8(m)). These regulations outline the required modifications for children whose disability restricts their diet (disability reasons) and the optional modifications for children 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 school food authorities (SFAs) must 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 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 children with disabilities have equal opportunity to participate in or benefit from a program. The general guideline in making a reasonable modification is that children with disabilities must be able to participate in and receive benefits from programs that are available to children without disabilities.

- **Case-by-case basis** means that the meal modifications are specific to the individual medical condition and dietary needs of each child, based on the specific information provided by the state licensed healthcare professional or registered dietitian in the child's medical statement or, if applicable, the child'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).

- 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 in School Nutrition Programs*.

Optional Meal Modifications for Non-disability Reasons

SFAs may choose to make optional 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.

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

- **Non-disability 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. For information on the USDA meal patterns for the school nutrition programs, visit the CSDE webpages below.
    - Afterschool Snack Program Meal Patterns
    - Meal Patterns for Grades K-12 in School Nutrition Programs
    - Meal Patterns for Preschoolers in School Nutrition Programs

> While a medical statement is not required for non-disability modifications within the meal patterns, SFAs are encouraged to maintain documentation acknowledging the child's meal modification. Local educational agencies (LEAs) may also choose to apply stricter guidelines and require a medical statement to ensure clear communication between food service staff and parents/guardians regarding the appropriate meal modifications for the child.

- **Non-disability 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. 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 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 in the Meal Patterns for the School Nutrition Programs*.

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

Optional Fluid Milk Substitutes (Nondairy Beverages) for Non-disability Reasons

The USDA allows optional fluid milk substitutes (nondairy beverages) for children who do not consume regular cow's milk due to non-disability reasons, such as personal preferences or health concerns. Fluid milk substitutes are plant-based beverages like fortified soy milk that are intended to replace cow's milk. SFAs may choose, but are not required, to offer one or more nondairy beverages to all students.

Nondairy milk substitutes for non-disability reasons must meet the USDA's nutrition standards for fluid milk substitutes defined in 7 CFR 210.10(d)(2)(ii) of the NSLP regulations and must be fortified in accordance with the Food and Drug Administration's (FDA) fortification guidelines. In addition to the USDA's nutrition standards, fluid milk substitutes offered in public schools must also meet the state beverage requirements for nondairy milk substitutes under Section 10-221q of the Connecticut General Statutes (C.G.S.); they cannot exceed 4 grams of sugar per ounce, 35 percent of calories from fat, and 10 percent of calories from saturated fat.

Only certain brands of fluid milk substitutes meet these standards. List 17: Dairy Alternative Beverages of the CSDE's List of Acceptable Foods and Beverages webpage identifies commercial nondairy beverage products that meet the USDA's nutrition standards for fluid milk substitutes and the requirements of the state beverage statute. Nondairy beverages that do not meet these requirements cannot be served in reimbursable meals and afterschool snacks unless the child has a medically documented disability that specifically requires this substitution.

Overview of the Requirements for Meal Modifications in the School Nutrition Programs

Documentation for fluid milk substitutes

With the implementation of the Whole Milk for Healthy Kids Act of 2025, effective January 14, 2026, a written statement is not required to request a fluid milk substitute for non-disability reasons for the NSLP meal patterns for grades K-12.

Milk substitutes for non-disability reasons continue to require a written statement for the SBP and ASP meal patterns for grades K-12; the NSLP, SBP, and ASP preschool meal patterns; and the SMP. This statement must identify the need for the milk substitute and may be submitted by the parent/guardian, a state licensed healthcare professional, or a registered dietitian. Written requests for fluid milk substitutes must be maintained on file with the student's medical records.

For detailed guidance on the requirements for fluid milk substitutes, refer to the CSDE's resources, *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*.



Overview of the Requirements for Meal Modifications in the School Nutrition Programs

Required Meal Modification Documentation for Disability Reasons

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

1. Information about the child's physical or mental impairment that is sufficient to allow the SFA to understand how it restricts the child's diet.
2. An explanation of what must be done to accommodate the child'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 child 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 Individualized Education Program (IEP) or 504 plan

SFAs are not required to obtain a separate medical statement if the child has an IEP or 504 plan that includes the three required elements, or the LEA obtains the required information during the development or review of the child's IEP or 504 plan.

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. SFAs are not required to obtain a separate medical statement when an alternate written or electronic statement provides the required information.

Determining if Meal Modifications are Required

SFAs can determine if a child requires a meal modification by reviewing question 1 in section B of the CSDE's medical statement form, *Medical Statement for Meal Modifications in the School Nutrition Programs.* This question asks the state licensed healthcare professional or registered dietitian to indicate if the child has a physical or mental impairment that restricts their diet.

- If the answer is "Yes," the SFA must make a reasonable meal modification.
- If the answer is "No," the SFA may choose to make a reasonable meal modification.

Overview of the Requirements for Meal Modifications in the School Nutrition Programs

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.

Procedural Safeguards

The USDA nondiscrimination regulations (7 CFR 15b.25) require local educational agencies (LEAs) to establish a procedural safeguards process that provides notice and information to parents and guardians regarding how to request a reasonable meal modification to accommodate a child's disability, and their procedural rights for grievance procedures (7 CFR 15b.6(b)).

At minimum, LEAs must notify parents and guardians of the process for requesting meal modifications to accommodate a child's disability and arrange for an impartial hearing process to resolve grievances related to requests for meal modifications based on a disability. LEAs employing at least 15 individuals must ensure their procedural safeguards process provides for a prompt and equitable resolution of grievances and must designate at least one person to coordinate compliance with disability requirements. This individual is often referred to as the Section 504 Coordinator.

For more information on procedural safeguards, refer to the CSDE's resource, *Requirements for Procedural Safeguards for Meal Modifications in the School Nutrition Programs*.

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

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

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

Overview of the Requirements for Meal Modifications in the School Nutrition Programs

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 School Nutrition Programs webpage):
https://portal.ct.gov/sde/nutrition/special-diets-in-school-nutrition-programs/medical-statements

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

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)

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

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

Overview of the Requirements for Meal Modifications in the 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: Expanding Fluid Milk Options in Child Nutrition Programs (91 FR 25073):
https://www.federalregister.gov/documents/2026/05/08/2026-09212/expanding-fluid-milk-options-in-child-nutrition-programs

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

Whole Milk for Healthy Kids Act of 2025:
https://www.congress.gov/bill/119th-congress/senate-bill/222/text

Overview of the Requirements for Meal Modifications in the School Nutrition Programs

For more information, visit the Connecticut State Department of Education's (CSDE) 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/overview_meal_modifications_snp.pdf.

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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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