

This document details the requirements specific to FDCH sponsors for administering the Child and Adult Care Program (CACFP) Special Dietary Needs (SDN) requirements.

Use the following resources for instructions on meeting the CACFP SDN requirements:

[Special Dietary Needs and the CACFP Handout](#)

Explains:

- The definition of disability and non-disability related SDN
- The requirements on making accommodations for disability-related SDN
- Documentation requirements (e.g. definition of a valid medical statement)
- Guidance on SDN oversight at the sponsor level

[CACFP Special Dietary Needs Tracking Form](#)

Instructions are provided on the form for completing one for each child who has SDN

[DPI Guidance Memorandum L: Special Dietary Needs Requirements](#)

[Determining if Meal Modifications are Required Flowchart](#)

Assists in determining whether the provider is required to accommodate a child's SDN

[Creditable Non-Dairy Beverages List](#)

Provider Responsibilities:

- Obtain medical statements/written family requests and fully complete the [CACFP Special Dietary Needs Tracking Form](#) for both disability and non-disability related SDN, even when the accommodations are being met within the meal pattern requirements.
Medical statements must be valid and written family requests must provide adequate information on omitted foods and substitutions.
- Ensure that the SDN identifier is selected on the enrollment form for children with SDN
- Retain each child's SDN documentation onsite with their CACFP records for reference on meeting each child's SDN and whether the child's meals can be claimed for reimbursement.
- Submit copies (both the completed SDN Tracking Forms and medical statements/written family requests) to the sponsor for approval to receive reimbursement for the child's meals.

Sponsor Responsibilities

- Oversee SDN documentation and eligibility of meal reimbursement for children with SDN at the claim processing level and home visit level
- Claim Level:
 - Software System Controls for Claim Level Monitoring:
Sponsors must use their software disabling/enabling function to control meal reimbursement for children with SDN.
 - Most importantly for children whose SDN accommodations are not met within the meal pattern requirements and whose families are supplying any components of their children's meals

- Children's Enrollment Information:
Families (or providers) must select the SDN option within their children's CACFP enrollment information when they have any SDN (both disability-related and non-disability related).
 - This is in order to trigger the SDN tracking function within the sponsor's software system.
 - Sponsors should run a query of children whose eligibility status is pending approval of their SDN documentation
- Sponsor Verification of SDN Documents:
The sponsor must verify the completeness and validity of each child's SDN documents before activating the child's meal eligibility status within the software system.
 - When a child's SDN accommodations fall outside the meal pattern requirements, the provider must not receive payment for a child's meals if the required documentation is not submitted by the end of the claim month.
- Home Visits:
Monitor SDN at each home visit:
 - Review the children's SDN documents onsite to verify the provider is accommodating the children, as specified on their *CACFP Special Dietary Needs Tracking Form* and medical statement/written family request information.
 - Check for any children with SDN who do not have the required documentation and are not identified as having SDN on their enrollment forms.
 - During a home visit, if the monitor becomes aware of a child who has a SDN, does not have the required SDN documentation, and whose meals have been reimbursed, the monitor must:
 - **Contact the admin office for putting the child in "pending" or "inactive" status within the claims system, in order to immediately stop any further reimbursement until the required SDN documentation is submitted and verified by the sponsor as valid.**

Exception: Meal reimbursement for a child's meals does not need to be stopped when the child's SDN is being met within the meal pattern requirements and all components are being supplied by the provider.

However, the required SDN documentation still must be obtained and submitted to the admin office.

FDCH Sponsor Questions/DPI Answers - Implementation of CACFP SDN Tracking Form
Submitted during FFY 2019

Question/Scenario:

Do we need a SDN tracking form for any of the creditable milks that aren't on the non-dairy sub list, for the following milks of appropriate fat content for child's age?

Goat milk; lactose-free; lactose-reduced; buttermilk (fat free or low-fat); acidified milk

DPI Answer:

Yes, a CACFP SDN Tracking Form should be completed, but a medical statement would not be required, as long as the fat content is appropriate.

When the parent requests this substitution, but doesn't provide a valid medical statement, the provider should fill out the "Non-Disability" side of the tracking form. (But if the fat content of the milk substitution is not appropriate for the child's age, then a valid medical statement must be obtained in order to claim meals serving this milk.)

Question/Scenario:

Is it true that we need to keep on file any and all special diets, whether or not they can be reimbursed, including the following situations? Or do we only have to keep on file those special diets that can be reimbursed?

- Child allergic to strawberries but provider has no medical statement, so provider substitutes from same food group (blueberries)
- Parent brings all foods for preference reasons, and provider knows she doesn't claim meals for that child
- Child drinks lactaid, a creditable milk
- Parent had doctor sign a medical form for plant milk for parent preference reasons, not medical disability, and provider knows she can't claim

DPI Answer: Yes, providers should complete and submit the CACFP SDN Tracking Form along with the family requests/medical statements to the FDCH sponsor, for any and all special diets regardless whether or not they can be reimbursed, including these example situations. This is to ensure that the provider is properly accommodating disability-related SDN, that creditable foods are being served, and for the provider's certification of her/his understanding of not being able to claim a child's meals in the case where the substitution is not creditable or the family supplies more than one component for a non-disability SDN.

Question/Scenario:

A parent would like the provider to serve a non-dairy substitute for milk that is on the approved list

A. Is this a scenario when a family's written request is needed?

B. And if yes, does it make a difference if the parent prefers it, but the provider is purchasing it?

DPI Answer:

A. The family needs to provide a written request to document their request, the reason, and the substitution to be served.

B. It does not make a difference on whether the provider or parent supplies.

Question/Scenario:

If the provider/parent has provided a written request for a non-dairy beverage form, do they also need to fill out the tracking form?

DPI Answer: Yes, the tracking form must be completed; there are too many "if-then-buts" scenarios to set parameters for when the tracking form does or does not need to be completed. Non-Dairy beverages can be for a physical/mental impairment (disability) or lifestyle preference (non-disability). If the SDN is disability-related (and has a valid medical statement), then the provider would have to offer to accommodate for the child's SDN by offering to supply the substitution; If the provider does not offer to supply, she/he is not compliant with the ADA and thus the CACFP requirements.

Question/Scenario:

Can we reimburse this special diet for child A? Here's the situation.

Child A has a medical form signed by physician saying "No dairy milk. Reason: lifestyle preference and family history of lactose intolerance, we don't buy dairy milk in our home. Substitute cashew milk or almond milk, no soy."

Child B is sibling of Child A and also in care at same provider. Child B sibling has a medical form signed by physician for almond milk and coconut based yogurt for reasons of milk allergy with hives.

If family members have dairy issues, does that count as a medical disability for Child A who may also have issues but hasn't been exposed to dairy to find out?

DPI's Answer:

Child A's medical statement is not sufficient to support serving cashew or almond milk to this child for claiming his/her meals for reimbursement.

That child A has a milk allergy OR lactose intolerance as an impairment must be determined for this child in his/her own right, not alleged based on family history. Furthermore, the reason of lifestyle preference and that the family doesn't buy dairy milk "in our home" cannot be justified by a medical statement for claiming meals that contain non-creditable substitutions. The reason must be for an impairment that affects a major life activity, such as digestion, for which allergies and intolerances can be as such.

Aside from this, even if one were to accept one child's valid medical statement supporting a disability-related special dietary need as justification for accepting his/her sibling's invalid statement to allow meal reimbursement, child A's medical statement is not the same as Child B's statement, as far as the specific impairment and the recommended substitutions. Lactose intolerance is not the same as a milk allergy; child B's statement says almond and coconut milk and child A's statement says cashew or almond milk.

Question/Scenario:

Which medical professionals are authorized to write RXs in MN?

DPI Answer:

Very similar to WI, except the credentials for nurse practitioners may look a little different.

- Licensed physicians
 - Physician assistants
 - Advanced practice registered nurses such as a certified nurse practitioners
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