Special Dietary Needs and the CACFP

USDA requires programs make reasonable modifications to accommodate participants with disabilities to provide equal opportunity to participate. This is required only when supported by a written medical statement from a Wisconsin Licensed Healthcare Professional authorized to write medical prescriptions: Physician, Physician Assistant, Nurse Practitioner (APNP).

**What is a disability?**
Physical or mental impairment that substantially limits one or more major life activities (includes eating, breathing, digestive and respiratory functions, etc.). Most physical and mental impairments will constitute a disability, it does not need to be life threatening.
Ex. Digestion is impaired by lactose intolerance, whether or not consuming milk causes severe distress.

**What is NOT a disability?**
Eating certain foods or eliminating foods from the diet due to a general health concern and/or preference.
Ex. Request that a participant does not drink cow’s milk because of a preference, not because the participant has lactose intolerance.

**DISABILITY**
Supported by a valid written medical statement

Program must offer a reasonable modification(s)* that effectively accommodates the participant’s disability & provides equal opportunity to participate in CACFP

Modification(s) may or may not meet CACFP meal pattern requirements

Meals are reimbursable (whether or not the CACFP meal pattern is met)

*Reasonable Modification(s):
- Related to disability or limitation caused by disability
- Not required to provide exact modification requested, however, must work with family to determine a reasonable modification that effectively accommodates the disability. Ex., not required to provide a particular brand name, but must offer a substitute that does not contain the specific allergen
- A disability may require modifications to more than one meal component
- Programs may never require the family to provide the accommodation

Effectively accommodate ALL participants with the same type of disability: Design a plan to accommodate common disabilities. Many can be managed within the meal pattern when a variety of foods is available. Examples:
- Offer one type of lactose-free milk to accommodate participants with lactose intolerance.
- Have a variety of fruits on hand, so participants with an allergy to a particular fruit can be served a different fruit.

**Written Medical Statement:**
A valid medical statement for a disability must be completed and signed by a WI Licensed Healthcare Professional authorized to write medical prescriptions: Physician, Physician Assistant, or Nurse Practitioner (APNP)

It must include the following information:
1. Description of impairment (reason for request)
2. How to accommodate the impairment (e.g. items(s) to be avoided and recommended substitution(s))

Seek clarification if statement is unclear or lacks sufficient detail so a proper and safe meal can be provided

**Examples of Medical Statements**

**ACCEPTABLE:**

STATEMENT
Cal is lactose intolerant and cannot drink cow’s milk. He should be served almond milk.

Dr. Dan Physician

**NOT ACCEPTABLE:**

STATEMENT
Serve Sam almond milk.

Dr. Dan Physician

Disability not supported by a valid medical statement:
Programs may choose to accommodate requests related to a disability not supported by a valid medical statement if the requested modifications can be made while meeting CACFP meal pattern requirements.
Such meals are reimbursable.

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Examples of non-disability special dietary need requests:

**Request for a non-creditable beverage**

The following beverages are not creditable. When served in place of milk, meals and snacks cannot be claimed for reimbursement:

- Non-dairy beverages not nutritionally equivalent to cow's milk including almond, cashew, coconut, hemp, oat, rice and some soy milks
- 2% milk
- Water

**Request for ethnic, religious, vegetarian reasons**

- Programs may choose to supply creditable food(s) and/or a creditable beverage substitute. Meals and snacks can be claimed for reimbursement.
- Families may choose to provide **ONE** creditable component; the program must supply all other components with creditable foods. Meals and snacks can be claimed for reimbursement.

**Accommodate requests within the meal pattern:**

In many cases, requests can be managed within meal pattern requirements when a well-planned variety of foods is available. Examples:

- Offer one type of creditable soymilk to accommodate participants requesting a non-dairy beverage. Because this modification is creditable, the meal meets CACFP requirements and is reimbursable
- Accommodate vegetarian participants by serving creditable meat alternates

**Written Statement from Family:**

1. Identifies the non-disability special dietary need, including items not to be served and allowable substitutions
2. May include a statement that the family chooses to provide foods (if applicable)

**Parent-Provided Component:**

A family may choose to provide **one creditable component** towards a reimbursable meal for a non-disability special dietary need

- Religious
- Ethnic
- Lifestyle preference (organic, vegetarian)
- Other (i.e. health reason not supported by a valid written medical statement)

**Special Dietary Needs Tracking Form:**

1. The program completes one for each participant accommodated for a disability or non-disability special dietary need.
2. Keep form and documentation, as specified, on file.

*Find in Guidance Memorandum 12*

**Call or email your consultant when you have a question about special dietary needs**

This institution is an equal opportunity provider.
Special Dietary Needs and the CACFP
What to Do Next:

**Designate Responsible Staff**
- Designate staff responsible for managing all special dietary needs. This point person will ensure:
  - Valid documentation is on file for participants with disabilities and participants’ needs are met
  - Meals/snacks for non-disability special dietary needs meet CACFP meal pattern requirements
  - Only creditable meals/snacks for non-disability special dietary needs are claimed for reimbursement

**Obtain Appropriate Documentation**
- Special Dietary Needs Tracking Form complete for each participant with a disability or non-disability special dietary need request
- Disability: Written medical statement for physical or mental impairment that substantially limits one or more major life activities. Must be signed by a Wisconsin Licensed Healthcare Professional authorized to write medical prescriptions (Physician, Physician Assistant, Nurse Practitioner (APNP))
- Non-disability special dietary need: Written statement from family, DCF Health History and Emergency Care Plan form, medical statement from a non-licensed health care professional authorized to write medical prescriptions, or statement from a licensed health care professional that specifies a family’s dietary preference, not a disability

**Train Staff on Accommodating Disabilities**
- Participants with a disability that affects the diet must be accommodated. It is vital to follow the directive of a written medical statement to ensure the safety of a participant
- Kitchen staff must know how to properly manage special dietary needs and make substitutions (ex. know appropriate food substitutions, reading labels for food allergens).
- Classroom staff must inform the designated staff responsible for managing special dietary needs when a family brings in a food/beverage to the classroom so the request can be handled appropriately
- Staff completing meal counts must know that meals/snacks CANNOT be claimed when:
  - A participant is served a meal or snack that does not meet meal pattern requirements unless the participant is being accommodated for a disability that is supported with a written medical statement
  - A participant is served non-creditable food item(s) provided by the Program or the family
  - A participant is served more than one component supplied by the family
  **Examples:**
    - Non-creditable beverage is provided by Program or family
    - Family provides two components of a meal, ex. the grain and meat alternate
    - Family provides a non-creditable component, ex. non-creditable meatless substitute

**Menu Evaluation**
- Review menus and determine if your program will design a meal plan within the CACFP meal pattern to accommodate common disabilities or other non-disability requests. Examples:
  - Offer lactose-free milk to accommodate participants with lactose intolerance
  - Offer a creditable non-dairy beverage nutritionally equivalent to cow’s milk
  - Offer a daily vegetarian option