

Welcome to Tuesday Talks! Today we're going to talk about some important aspects of accommodating Special Dietary Needs requests in the CACFP.

# **Webinar Takeaways**

- Important
- 1. When a medical statement is required
- 2. Must offer modification(s) to accommodate a disability
- 3. When meals served for non-disability requests cannot be claimed
- 4. Special Dietary Needs Tracking Form

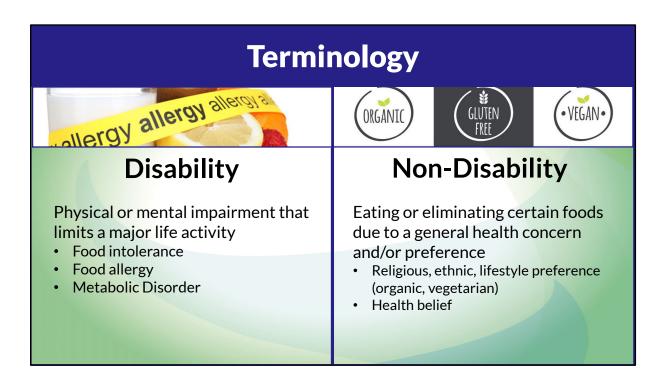


Today, we want you to walk away knowing these important points about Special Dietary Needs:

- 1. When a valid medical statement is required to be on file
- 2. That programs must offer meal modifications when a special diet request is due to a disability supported by a valid medical statement
- 3. When meals served for non-disability requests cannot be claimed, and
- 4. How to complete the Special Dietary Needs Tracking Form

We will go into these points in more detail.

All Special Dietary Needs information is under the Special Dietary Needs section of Guidance Memorandum 12.



First let's review some special dietary needs terminology.

In the CACFP, a disability is a physical or mental impairment that substantially limits one or more major life activities. The impairment does not need to be life threatening. Common disabilities in the CACFP include food intolerances, food allergies, and metabolic disorders.

A non-disability is eating certain foods or eliminating foods from the diet due to a general health concern and/or personal preference. This includes eating certain foods due to religion, ethnic background, lifestyle preference, such as eating organic or vegetarian, and general health beliefs; for example, it is a parent's belief that their child should not drink milk because of health reasons.



Now let's talk about when a medical statement is required to be on file.

- A valid medical statement must be on file when serving a meal that does not meet meal pattern requirements to accommodate a disability.
- This includes meals that do not contain all required components or meals that include non-creditable foods.
- The medical statement is required for the program to claim these meals.

A medical statement is not required for a disability when a program makes accommodations within meal pattern requirements, meaning the substitution is a creditable food and all required meal components are served. For example, serving lactose-free milk (which is a creditable milk) to a participant who has lactose intolerance.

# Valid Medical Statement



- Description of impairment
- How to accommodate the impairment
- Signed by licensed healthcare professional authorized to write medical prescriptions
  - · Physician, advanced nurse practitioner, physician assistant

When a statement is unclear, obtain clarification so proper and safe meal can be provided

A valid medical statement includes the following information:

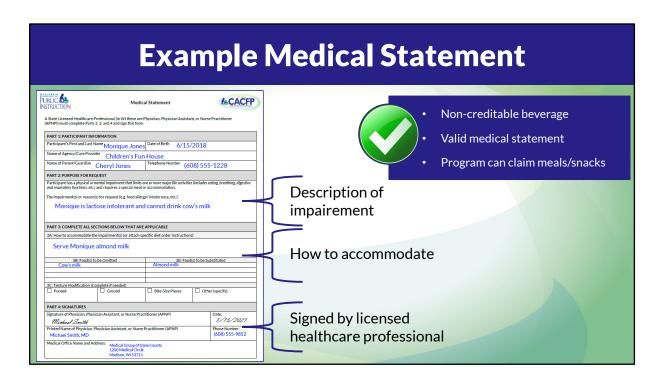
- Description of the impairment (or reason for request). This must identify, in some way,
  why the participant must be accommodated due to a physical or mental impairment.
  Examples are "participant is lactose intolerant," or "participant cannot eat foods with
  gluten due to digestive issues."
- The statement must also include how to accommodate the impairment. This must identify the foods to be avoided and appropriate substitutions that can be served to the participant.
- Last, a valid medical statement must be signed by a state licensed healthcare
  professional authorized to write medical prescriptions. In WI this is a physician,
  advanced nurse practitioner, or a physician assistant.

When a medical statement is unclear, or lacks sufficient detail, programs must obtain appropriate clarification so that a proper and safe meal can be provided. For example, if the statement just says the child is lactose intolerant but does not indicate what to serve in place of milk, you will want to get more information on what to serve the child.

Another example is when the request is more complex, such as the request to not serve a participant eggs. A medical professional should provide information on the extent that the allergen should be avoided. For example, some participants cannot eat whole eggs but can have eggs baked into other foods, while other participants cannot consume foods with eggs as an ingredient

Valid	Medical State	ment
Medical Statement  A Size Licensed Healthcar Phofesional dis VM these are Physician Physician Assistant, or Phares Practitioner  A Size Licensed Healthcar Phofesional dis VM these are Physician Physician Assistant, or Phares Practitioner  A Size Licensed Healthcar Physical Assistant of the size pit to form.  PARTS PARKENDAM PROSPANTON  Physician Frame And Leat Nance    Date of Birch   Name of Parts of Leat Nance   Date of Birch   Name of Parts of Canadian   Name of Parts of	ONLINEAR OF CRAINED AND MARKED  These or Cold Control (Section 2014)  CHILD MEALTH REPORT — CHILD CARE CENTERS  OF LINEAR OF CRAINED AND CONTROL OF CONTRO	Medical Clinics of Wisconsin 555 Water Street Madison, WI 12345  November 15, 2015  Patient: Jackson Foster DOB: 1174/2018 Date of Visit: 1174/2018 To Whom It May Concern:  Jackson Foster was seen in my clinic for a well child visit. He has been diagnosed with lactose intolerance. He should be served coconut milk in place of cow's milk. He can have all other types of dairy products.  If you have any questions or concerns, please do not hesitate to call. Sincerely,
38 Foods Lib & Chested   38 Foods Lib & Schestuded	The _ Do Coat to deliver and hardy of "the _ deliver by commended the activities of the _ deliver by the _	Eloise McCallister, MD

The DPI has a medical statement that can be given to participants to take to their healthcare provider to complete. This is shown on this slide. It can be found under the special dietary needs section of GM 12. Also acceptable is the DCF Child Health Report, or a letter from the participant's healthcare professional's office, provided all required information for a valid medical statement is included.



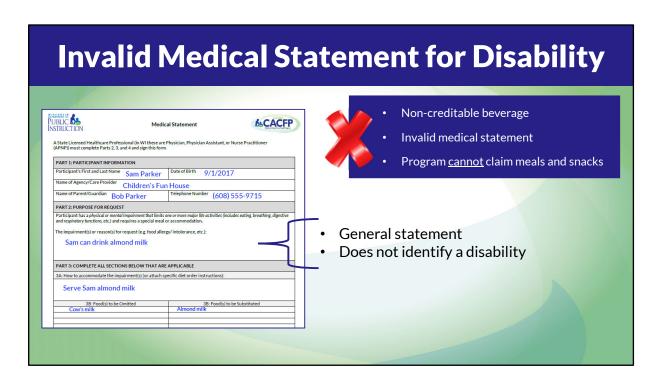
Let's go through an example of a valid medical statement. This participant is lactose intolerant.

#### The statement identifies:

- A description of the impairment: *Monique is lactose intolerant and cannot drink cow's milk*.
- How to accommodate the impairment: Serve Monique almond milk.

Last, the statement is signed by a state licensed healthcare professional.

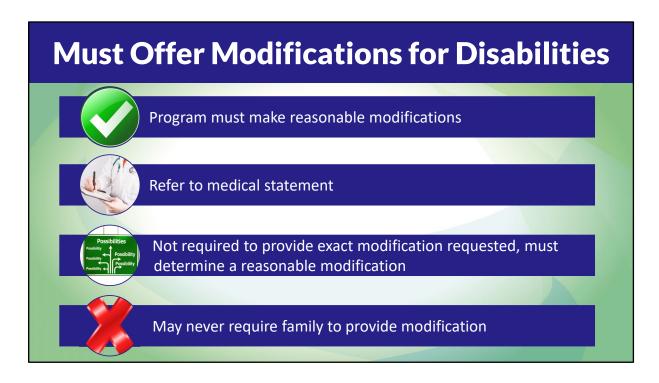
The statement indicates Monique is to be served almond milk, which is a non-creditable beverage. However, because the program has a valid medical statement on file for a disability, the program can claim all meals and snacks served to Monique when she is served almond milk.



In comparison, you may receive medical statements from families that are not valid for a disability. For example, a medical statement may be written in support of a family's eating preference but does not identify a disability and only includes general instructions to serve a non-creditable food item. If the medical statement does not identify the participant has a disability, a program cannot claim meals that include non-creditable foods or meals that do not meet meal pattern requirements.

In the example statement on the slide, the statement indicates *Sam can drink almond milk*. It does not identify that he has a disability.

If the program serves almond milk (which is a non-creditable beverage) to this participant, the program cannot claim this participant's meals for reimbursement.



Next, when there is a valid medical statement on file, programs must make reasonable modifications to meals at no extra charge, to effectively accommodate the disability. Doing so provides the participant equal opportunity to participate in the CACFP.

To understand how to accommodate the disability, refer to the written medical statement.

Programs are not required to provide the exact modification requested; however, you must work with the family to determine a reasonable modification. For example, a program is not required to provide a particular brand name but must offer a substitute that does not contain the specific allergen.

Programs may never require the family to provide the accommodation. However, families can choose to decline an appropriate accommodation made by the program and provide the substitutions.



Here are some examples of ways programs can accommodate disability requests:

- Serve an appropriate food substitution. For example, serve a specified milk substitute to accommodate lactose intolerance, or gluten free foods to accommodate celiac.
- Read food labels to ensure foods do not contain an allergen, for example, a participant with an egg allergy is not served foods containing eggs.
- Prepare and serve different menu items. For example, a program can serve a participant with an egg allergy a tofu scramble or yogurt in place of an egg bake.

Again, meals served for disability reasons can be claimed, even when meals do not meet meal pattern requirements, when supported with a valid medical statement.



Next, let's discuss serving meals for non-disability requests and when meals can and cannot be claimed. Remember, non-disability requests are due to eating or eliminating specific foods for personal reasons such as religious, ethnic, or lifestyle preference, for example eating organic or vegetarian. They also include other health reasons that are not supported by a valid medical statement.

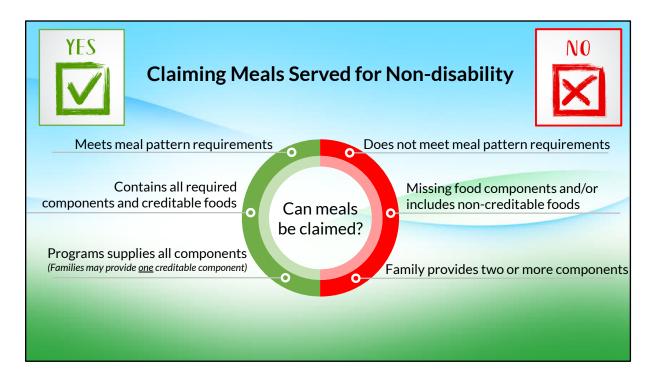


Programs are not required, but are encouraged, to accommodate non-disability requests and make substitutions.

Families may provide one creditable component for non-disability reasons.

All accommodations made for non-disability requests must be creditable and all required components must be served.

Last, non-disability special dietary needs requests are not intended to accommodate picky eaters by allowing families to provide meal substitutions to replace something their child doesn't like. Programs must serve the participant a complete meal with all required components, and families can provide items to be served in addition to the reimbursable meal.



Now let's go over when meals served for non-disability requests can and cannot be claimed.

- Meals can be claimed when the meal meets CACFP meal pattern requirements.
- Meals cannot be claimed when the meal does not meet CACFP meal pattern requirements.
- More specifically, meals can be claimed when the meal contains all required components and creditable foods.
- Meals cannot be claimed when missing required food components and/or the meal includes non-creditable foods.
- Last, meals can be claimed when the program supplies all components of the meal, or the family provides one creditable component.
- Meals cannot be claimed when the family provides two or more components.

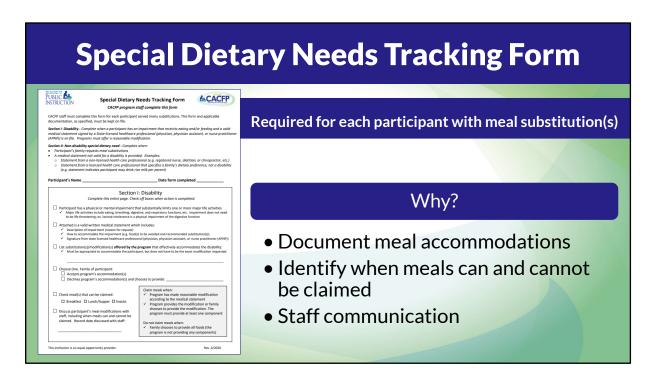


Here are some examples of non-disability request meal accommodations that <u>cannot</u> be claimed.

- When a participant is served a non-creditable non-dairy beverage, such as almond milk, coconut milk, cashew milk, or oat milk.
- When the family provides a non-creditable food item, such as a meatless burger that is not credited with a child nutrition label or product formulation statement.
- When omitting a component altogether, such as the grains component, or
- · When serving water or juice in place of milk.



When a participant is served a non-creditable meal to accommodate a non-disability request, their meal cannot be claimed and must not be counted in the meal count. For example, on this slide there are 7 children at this table eating a meal. The one child circled in green has been served a breakfast without milk due to family preference. Because the child's meal does not include all required components, the child's meal cannot be claimed. In this situation, you can claim 6 breakfasts, not 7 for this table. Or, if meal counts are recorded by child, such as on the Greater than 3 meal count form, this child is not marked for meals.



Last, let's go over the Special Dietary Needs Tracking Form.

This form must be completed for each participant served a meal substitution due to a disability or non-disability request.

# This is required to:

- · Document accommodations made to meals for disability and non-disability requests
- Identify when meals can and cannot be claimed, and
- Document that this information was communicated to staff



The Special Dietary Needs Tracking Form is an internal form. Program staff complete it. Do not have families or medical professionals complete this form.

You are not required to update this form annually. Only when changes occur do you need to update the form.

This form is not required when the request is to not serve a participant a food that your program does not serve. For example, if the request is to not serve a participant peanuts or peanut butter, but your program never serves these foods.

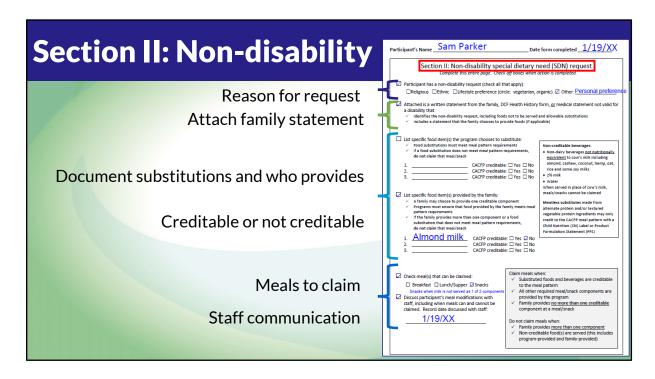


Let's go through how to complete the Special Dietary Needs Tracking Form.

Section 1 of the tracking form is to be completed when the request is due to a disability. Read all information in this section, check off all boxes, and document the required information.

#### This includes:

- Confirming the participant has a disability and attaching the medical statement to the form.
- Documenting the substitution or modification offered by the program and indicating if the family accepts or declines the accommodation. If the family declines, you must document what the family chooses to provide as the accommodation.
- Last, you must indicate meals that can be claimed by the program, and when the participant's meal modifications were communicated with applicable staff. You must also discuss with staff when meals can and cannot be claimed.

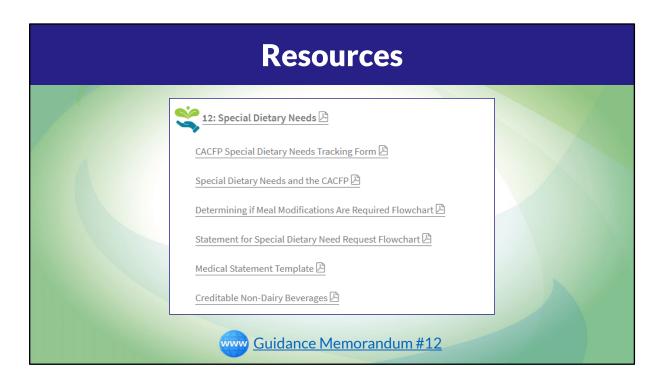


Section 2 of the tracking form is to be completed when the request is due to a non-disability. Read and check off all boxes and document the required information.

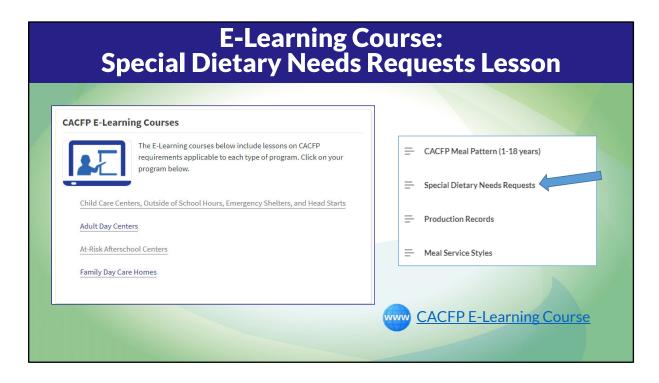
### This includes:

- Documenting the reason for the request and attaching the written statement from the family to the form.
- Documenting substitutions or modifications made. This includes who is providing the substitutions, the program or the family, and indicating if the substitutions or modifications are creditable to the CACFP.
- Last, you must indicate which meals can be claimed by the program and when the participant's meal modifications were communicated with applicable staff. You must also discuss with staff when meals can and cannot be claimed.

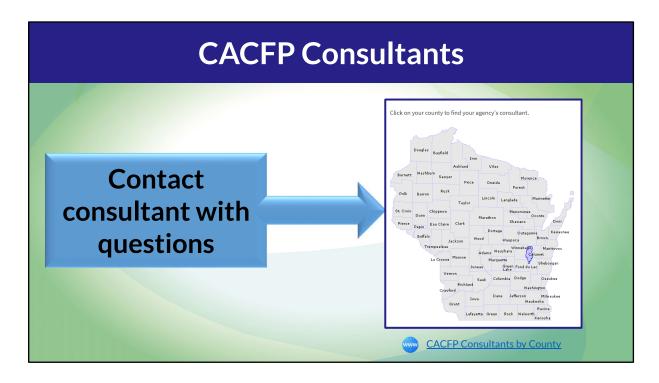
This Special Dietary Needs tracking form on this slide is an example for a participant with a personal preference request. Sam's family does not want him to drink regular milk and is providing almond milk, which is not creditable. Breakfasts and lunches served to Sam cannot be claimed because milk is a required component and Sam is being served a non-creditable substitute. Snack may be claimed when almond milk is not served as one of the 2 components. It was documented that staff were notified of this information, so they know what to serve Sam and know when not to claim Sam's meals.



This is the end of the presentation portion of the webinar. We covered a lot of information about special dietary needs in a short amount of time. For guidance and additional resources to help you manage special dietary needs requests in your program, go to the Special Dietary Needs section of Guidance Memorandum 12.



There is also more information in the Special Dietary Needs Requests lesson in the CACFP E-Learning Course. The link to access the E-Learning courses is on this slide.



Last, anytime you have questions about special dietary needs at your program, or about the CACFP in general, please reach out to your assigned consultant. You can find your agency's consultant at the *Consultants by County* link on this slide.

The live webinar included time for questions and to complete a survey. These slides were omitted from this handout. Only individuals who attended the live webinar event are able to complete the survey and receive a Registry Certificate.



Our next Tuesday Talks is scheduled for March 16<sup>th</sup> from 2:00- 2:30 and will be on Financial Management. This is applicable to all programs except for family daycare home sponsoring organizations and family daycare home providers.

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Thank you for attending today's CACFP Tuesday Talks. The webinar was recorded and the link will be posted on the Tuesday Talks webpage, along with a handout of the slides and notes.

Email: program.intake@usda.gov

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