

## CACFP Tuesday Talks: Special Dietary Needs Webinar Questions and Answers

The following are questions asked during the CACFP Tuesday Talks: Special Dietary Needs webinar, including those that could not be answered during the allotted time for the webinar.

- 1. Do I need to keep a separate menu that identifies meal substitutions served to each participant?**  
No. Programs complete the *Special Dietary Needs Tracking Form* to document substitutions provided to participants. This serves as the menu. For example, if you serve a milk substitute to a participant, the type of substitute served is documented on the *Special Dietary Needs Tracking Form*. Or, if you serve a different type of meat substitute to a participant who does not eat pork, you will list the different types of meat or meat alternates served when pork is on the menu, such as beef, chicken, cheese.
- 2. Why do I need to complete the Special Dietary Needs Tracking Form? It is more paperwork.**  
This form was developed because of USDA requirements that programs document substitutions and accommodations made for disability and non-disability requests. This form takes place of needing to keep separate daily menus for everyone with a meal modification.
- 3. I have a 4-year-old that is not growing enough for mom or doctor's liking. They want him to eat food served at lunch, but if he only eats a few bites they want to supplement with Pediasure. Do we need a doctor's note, and is this a disability? Can mom bring them in and supplement without a doctor note?**  
If Pediasure is a supplement served in addition to the meal, the family can provide Pediasure without a doctor's note. However, it is recommended to obtain a written statement from the family specifying that Pediasure is being provided, along with instructions to serve in addition to the meal. The program can claim the child's meals when the program serves the child a full reimbursable meal.
- 4. We have an infant whose parents would like a certain formula because the infant gets constipated if he drinks a regular formula our center provides.**  
Families of infants can decline the formula offered by the program and provide a different type of formula. Therefore, this family may provide a formula of their choosing. When a program serves an infant family-provided formula, meals and snacks can be claimed when:
  - Formula is the only component the infant is served at a meal or snack.
  - The program provides all food components served to the infant when the infant is developmentally ready to eat foods (ex. iron fortified infant cereal, baby foods).
- 5. If a family chooses not to participate in the CACFP and brings their own meals (i.e., vegetarian diet), is a form filled out as such-not participating?**  
A program may only exclude participants from the CACFP if the family has provided a written statement certifying they do not want their child to be enrolled in the CACFP. These participants must not be included in the meal counts claimed for reimbursement, on the Household Size Income Record, and they would not be required to have a completed *Special Dietary Needs Tracking Form* on file.
- 6. When a child has a medical statement with all the correct information and the family chooses to provide a non-creditable milk such as lactose-free milk, can meals be counted in meal counts?**  
To clarify, lactose-free milk is creditable to the CACFP meal pattern, as long as the correct fat content is served to the child depending on their age (ex. lactose free whole milk must be served to a 1-year-old).

Because there is a medical statement on file for a disability (ex. lactose intolerance), your program must offer a reasonable modification that effectively accommodates the disability. For example, if the medical statement states the child must be served lactose-free milk, your program must offer to provide

lactose-free milk. The family can choose to decline the accommodation made by the program and provide their own. In either situation, the program can claim the child's meals and snacks when lactose-free milk is served.

**7. When a family provides a "written statement" asking not to serve juice and the center chooses to provide fresh food in place of the juice can that child be counted in meal counts?**

Yes, as long as you are providing a full reimbursable meal by serving all required components of the meal and creditable foods. In this specific situation, serving creditable fresh fruit in place of juice is a creditable substitute and meals can be counted in the meal counts.

**8. I have a child that has a gluten allergy at my center. We provide him some food (fruit/veg), and he brings in some of his own (carbs). How would I count him?**

Participants with a gluten allergy may not be able to consume foods required to be served to meet the CACFP meal pattern. Because of this, a valid medical statement must be obtained and kept on file. The statement must identify the disability, foods to be omitted and appropriate substitutions/foods that can be served. With a valid medical statement on file for a disability, your program must offer a reasonable modification that effectively accommodates the disability (ex. serving food substitutions that do not contain gluten). The family can choose to decline the accommodation and provide their own. The program must complete Section I of the *Special Dietary Needs Tracking Form*. If the family chooses to decline the accommodations and provide their own, the program can claim the child's meals and snacks when the program provides at least one component of the meal or snack. When the family provides all components of the meal or snack, these meals and snacks cannot be claimed.

**9. If a provider supplies the lactose-free milk, do the parents still have to provide a diet statement to the provider if the provider is claiming the child's meals?**

Lactose-free milk is creditable to the CACFP meal pattern, therefore, a medical statement from a doctor is not required. However, the program should obtain a written statement from the family to document why lactose-free milk is being served to their child. Section II of the *Special Dietary Needs Tracking Form* must be completed by the program. If lactose-free milk is listed on menus as a milk type that is served, a written statement from the family is not required and the *Special Dietary Needs Tracking Form* does not need to be completed.

**10. If we have multiple children who drink soy milk, and they are offered the pitcher of soy milk but choose to drink a glass of water, can we still claim their meal?**

If meals are served family style, the pitcher of soy milk must be passed around to each child who drinks soy milk, so they have the opportunity to pour the soy milk into their glass. With family style, children can choose to decline the soy milk and drink water instead. In this situation the meals can be claimed. It is recommended to place two glasses in front of each child so they can choose both soy milk and water.

If meals are pre-plated and served to children (ex. a staff member pours milk into cups and then places in front of each child), soy milk cannot be declined. Pre-plated meal service also includes when staff go around the table and ask each child, "Do you want soy milk?" Staff must pour a glass of soy milk and serve it to each child. A second glass of water can also be served at the same time. Children cannot decline any meal component when staff pre-plate meals or walk around with bowls of food or pitchers of milk asking a child if they want the item. Pre-plated meals or snacks cannot be claimed when they are missing a meal pattern component.

**11. When you make a non-disability accommodation, do we need to require written documentation request from the family?**

Yes, you must obtain a written statement from the family documenting their request that a menu substitution be served. Section II of the *Special Dietary Needs Tracking Form* must also be completed by the program.

- 12. All kids are offered both milk and water at all meals, but some prefer water. How do we claim that?**  
If meals are served family style, milk must be passed around to each child, so they have the opportunity to pour it into their glass. With family style dining, children can choose to decline milk and drink water instead. In this situation the meals can be claimed. It is recommended to place two glasses in front of each child so they can choose both milk and water.

If meals are pre-plated and served to children (ex. a staff member pours milk into cups and then places in front of each child), milk cannot be declined. Pre-plated meal service also includes when staff go around the table and ask each child, "Do you want milk?" Staff must pour a glass of milk and serve it to each child. A second glass of water can also be served at the same time. Children cannot decline any meal component when staff pre-plate meals or walk around with bowls of food or pitchers of milk asking a child if they want the item. Pre-plated meals or snacks cannot be claimed when they are missing a meal pattern component.

- 13. We have one gluten free child. I shop for him each week to find whatever gluten free items I can find. If the item does not meet child nutrition, can we still count the meal?**

When your program serves foods that do not meet meal pattern requirements, a valid medical statement for a disability must be obtained and kept on file. The statement must identify the disability, foods to be omitted and appropriate substitutions/foods that can be served. With a valid medical statement on file for a disability, your program must offer a reasonable modification that effectively accommodates the disability and provides equal opportunity to participate in the CACFP. For example, serving food substitutions that do not contain gluten. The program must also complete Section I of the *Special Dietary Needs Tracking Form*. These meals and snacks can be claimed.

- 14. We have a participant with a disability, and we can easily substitute another creditable food for the required component. Is a medical statement required?**

A medical statement is not required for a disability when the modification can be met by substituting a creditable food item and the program is willing to do so. However, because you are serving a menu substitute, your program must obtain a written statement from the family requesting that a different food item be served. Your program must complete Section II of the *Special Dietary Needs Tracking Form* because you are serving the participant something different from the regular menu.

- 15. If a parent has a severe fish allergy and asked not to serve their child fish products, would a medical statement or written statement be needed? OR can we replace it with another creditable food?**

Since the child does not have a disability (allergy to fish), and your program is able to serve another creditable meat/meat alternate in place of fish, a medical statement is not required. However, because you are serving a menu substitute for a family request, your program must obtain a written statement from the family requesting that a different meat/meat alternate be served in place of fish and your program must complete Section II of the *Special Dietary Needs Tracking Form*. Meals can be claimed as long as you are serving a creditable meat/meat alternate in place of the fish.

- 16. If a child is allergic to fish and we substitute with chicken, do we still have to fill out special dietary needs paperwork?**

Since your program is serving a creditable food substitute in place of fish, a medical statement from a doctor is not required to be on file. However, because you are serving a menu substitute your program must obtain a written statement from the family requesting that a different meat/meat alternate be served in place of fish. Your program must complete Section II of the *Special Dietary Needs Tracking Form*.

- 17. For religious reasons, a child is not eating certain items. Our center is making accommodations for those children such as turkey instead of pork. Is this creditable?**

Foods that are creditable to the CACFP meal pattern (ex. turkey, chicken, fish) can be served in place of pork when making accommodations for a non-disability special dietary need request (i.e., religious

reasons). Because you are serving a menu substitute, your program must obtain a written statement from the family requesting that a different meat/meat alternate be served in place of pork and your program must complete Section II of the *Special Dietary Needs Tracking Form*.

**18. We have a participant whose parent prefers their child be served a beverage that is non-creditable. What do we do?**

Talk with the family and find out if the reason for serving a non-creditable beverage is because the participant has a disability. If so, ask the family to provide a valid medical statement. You may claim the meals/snacks supported by the medical statement.

- If the reason is due to preference and not a disability, your program is not required to provide the beverage. The family can provide the beverage. However, if the beverage is not creditable to the CACFP meal pattern, those meals cannot be claimed. This affects breakfast, lunch, and supper. You can serve the participant two creditable components at snack (not the milk component) and claim these snacks.
- You may also want to discuss creditable milk substitutes with the family and determine if one of those can be served instead of cow's milk. You may claim the meals/snacks where a creditable milk substitute is served. Some soy milks are creditable. The [Creditable Non-Dairy Beverages](#) handout lists creditable soy milks. This handout can also be found under GM 12: Special Dietary Needs.

**19. Can I claim meals if a non-creditable substitute is provided by the family?**

If a family is providing a non-creditable substitute for a non-disability request, and this substitute replaces a meal component offered by your program, the meals and/or snacks that include the substituted item cannot be claimed for reimbursement. However, because you are serving a menu substitute, your program must obtain a written statement from the family requesting that a different food item be served. The program must complete Section II of the *Special Dietary Needs Tracking Form*. Note, USDA states that programs must offer all participants without a documented disability a complete, reimbursable meal and families can provide foods to serve as extra, in addition to the full, reimbursable meal served by your program. These meals can be claimed.

If a participant with a documented disability requires a non-creditable substitute based off their completed valid medical statement, the meals and/or snacks can be claimed. Programs must offer a reasonable modification to accommodate a disability. The family can choose to decline the accommodation and provide their own. The program must complete Section I of the *Special Dietary Needs Tracking Form*. If the family chooses to decline the accommodations and provide their own, the program can claim the child's meals and snacks when the program provides at least one component of the meal or snack. When the family provides all components of the meal or snack, these meals and snacks cannot be claimed.

**20. I make lactose-free milk and soy milk available to families. Am I required to provide other substitutes, like almond milk?**

Programs must offer accommodations for participants with a disability according to a valid medical statement. If a medical statement indicates a participant must be served almond milk, you can work with the family to determine if soy milk or lactose free milk is acceptable. However, it may not be as this participant could have a milk and soy allergy, so lactose-free milk and soy milk would not be appropriate. If these types of milks are not acceptable to the family, you must follow the medical statement and provide almond milk as an appropriate substitution for the participant in accordance with their medical statement.

**21. Can I claim meals if my program provides some of the meal, but the family provides milk and M/MA?**

If the family is bringing in foods because of a non-disability request, meals cannot be claimed because the family is providing more than one component. However, because you are serving menu substitutes, your program must obtain a written statement from the family requesting that a different food item be

served and indicate they are providing the foods. The program must complete Section II of the *Special Dietary Needs Tracking Form*.

If the participant has a documented disability with a valid medical statement on file, programs must offer a reasonable modification to accommodate a disability. The family can choose to decline the accommodation and provide their own. The program must complete Section I of the *Special Dietary Needs Tracking Form*. If the family chooses to decline the accommodations and provide their own, the program can claim the child's meals and snacks when the program provides at least one component of the meal or snack. When the family provides all components of the meal or snack, these meals and snacks cannot be claimed.

**22. We have vegan participants who are served veggie burgers. Can we claim meals when a veggie burger is served as the meat alternate?**

Veggie burgers are a processed combination food item that contain ingredients that may not be creditable to the meal pattern as a meat alternate. Therefore, a Child Nutrition (CN) label or Product Formulation Statement (PFS) is required to be on file to credit these items. If a CN label or PFS cannot be obtained, the item is not creditable and the meal cannot be claimed.

**23. If I cannot get reimbursed for meals that do not meet meal pattern requirements, can I require the family to bring in the full meal?**

No. Programs participating on the CACFP must offer Program benefits to all enrolled participants. This includes offering meals to participants whose families choose not to eat certain foods. Programs must offer a full, reimbursable meal to all participants. Families can provide foods to serve in addition to the full, reimbursable meal served by your program.

**24. Some meal accommodations for disabilities are more expensive. Can I charge a family for the increase cost to their child's meal?**

No. USDA requires that programs make reasonable modifications to meals at no extra charge to accommodate disabilities which restrict a participant's diet.