

Food Substitutions and Variations

Program regulations require program operators to make reasonable modifications to meals and snacks, including providing special meals at no extra charge to accommodate disabilities that restrict a participant's diet. In many cases, disabilities can be managed within the Child and Adult Care Food Program (CACFP) meal pattern requirements when a well-planned variety of nutritious foods is available to participants.

However, in other cases, the needs of a participant with a disability may involve requests for accommodations that result in the service of meals that do not meet the meal pattern requirements.

Program regulations require CACFP operators to provide modifications for participants with disabilities on a case-by-case basis only when requests are supported by a written statement from a registered dietitian or a state-licensed healthcare professional, which is defined as an individual authorized to write medical prescriptions under state law. In Missouri, state-licensed healthcare professionals include physicians, physician assistants, or nurse practitioners. Meals that do not meet the meal pattern requirements are not eligible for reimbursement unless supported by a medical statement. However, CACFP operators may choose to accommodate requests related to a disability that are not supported by a medical statement if the requested modifications can be accomplished within the meal pattern requirements. Such meals are reimbursable. (Reference [CACFP 14-2017 Policy Memorandum on Modifications to Accommodate Disabilities in the Child and Adult Care Food Program and Summer Food Service Program](#))

Medical Statement Requirements

To claim a meal that does not conform to the regulatory meal pattern, there must be a medical reason or a special dietary need and a signed statement on file. Use of the [Medical Statement to Request Special Meals and/or Accommodations \(CACFP-227\)](#) is recommended; however, an equivalent form provided by a medical authority that documents the requirements is acceptable.

Disability

When a child has a disability that affects the food the child can consume, the parent or guardian must provide a medical statement form signed by a physician, physician assistant, nurse practitioner, or registered dietitian. The statement must be kept on file, handled confidentially, and include the following:

- A description of the participant's physical or mental impairment that is sufficient to allow the program operator to understand how it restricts the participant's diet.
- An explanation of what must be done to accommodate the child's disability.
- The food or foods to be omitted from the participant's diet.
- The appropriate food substitutions.

Child care centers participating in the CACFP are required to make substitutions or modifications to the meal pattern when a disability restricts the diet. Substitutions must be made only when supported by a written statement signed by a physician, physician assistant, nurse practitioner, or registered dietitian.

If it is necessary for a parent to furnish a particular food item(s) for medical reasons as described in [7 CFR 226.20\(g\)](#), the meal may still be claimed for reimbursement if the request is

supported by a written statement signed by a physician, physician assistant, nurse practitioner, or registered dietitian and the center supplies at least one required meal component.

Note: Reimbursement for meals served with documented food substitutions is claimed at the same reimbursement rate as meals that meet the meal pattern. The center may not charge for the substituted food item. Substitutions that exceed program reimbursement are at the center's expense.

Special Dietary Need

If a center is serving a child with special dietary needs that are not a disability, the parent or guardian may request substitutions by submitting an accurately completed [Medical Statement to Request Special Meals and/or Accommodations](#) form signed by a physician, physician assistant, nurse practitioner, or registered dietitian listing the foods to be omitted and appropriate substitutions. Substitutions may be made on a case-by-case basis, at the discretion of the center, for a participant who is unable to consume a food item because of a non-disability medical or other special dietary need. Centers are encouraged to meet participants' non-disability dietary preferences when planning and preparing CACFP meals.

Fluid Milk (Non-Dairy) Substitutions

Milk substitutions that are made due to special dietary needs that are not a disability must be nutritionally equivalent to fluid milk. The facility may make such substitutions at its discretion, but it is not required. A written request for a fluid milk substitution may be made by a physician, physician assistant, nurse practitioner, registered dietitian, or parent or guardian. The request must identify the medical or other special dietary need that restricts the diet of the child. Fluid milk substitutes must contain all nutrients in the minimum quantities specified to be considered nutritionally equivalent to fluid cow's milk:

Fluid Milk Substitute - Minimum Nutrient Requirements

Nutrient	Per one (1) cup 8 ounces
Calcium	276 mg.
Protein	8 gm.
Vitamin A	150 mcg retinol activity equivalents (RAE)
Vitamin D	2.5 mcg
Magnesium	24 mg.
Phosphorus	222 mg.
Potassium	349 mg.
Riboflavin	0.44 mg.
Vitamin B-12	1.1 mcg.

A medical statement is required for non-dairy substitutions due to a disability that do not meet the nutritional standards of cow's milk as described above.

Non-dairy beverages that meet USDA Substitution criteria per eight fluid ounces include:

- **8th Continent:** Original
- **Pacific Natural:** All Natural Ultra Original
- **Kikkoman:** Pearl Organic Soymilk Smart Original

- **Wal-Mart Great Value:** Original Soymilk
- **Sunrich Naturals:** Original Soymilk
- **Silk:** Original Soymilk
- **Ripple:** Original, Vanilla, and Chocolate plant-based milk

Note: The Missouri Department of Health and Senior Services-Community Food and Nutrition Assistance (DHSS-CFNA) does not endorse the companies or products listed. This list is not all-inclusive. Read the nutrition facts panel or contact the manufacturer to ensure that product formulations are current. Non-dairy beverages served to children 1 through 5 years old must be unflavored due to the higher sugar content of flavored varieties. (Reference: [CACFP 17-2016](#))

Any reasonable parent or guardian written request for a non-dairy milk substitution that is nutritionally equivalent to fluid milk could be accepted at the discretion of the center without providing a medical statement. For example, if a parent has a child who follows a vegan diet, the parent can submit a written request to the child's caretaker asking that soy milk be served in lieu of cow's milk. The written request must identify the medical or other special dietary need that restricts the diet of the child. Non-dairy milk substitutions are at the option and expense of the facility. Other examples that may be considered a reasonable written request would be for religious, cultural or ethical reasons. However, a request which only states that a child "does not like milk" would not be a reasonable request for a fluid milk substitute.