

Food Substitutions and Variations

Regulation and guidance requires program operators to provide reasonable accommodations for children whose disability restricts their diet, for all meals and snacks, when supported by a medical statement signed by a licensed physician or a state licensed health care professional who is authorized to write medical prescriptions under state law.

Medical Statement Requirements

In order 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 CACFP-227 Medical Statement to Request Special Meals and/or Accommodations is recommended; however, an equivalent form provided by a medical authority which documents the requirements is acceptable.

Disability

When a child has a disability that affects food the child can consume, the parent or guardian must provide a medical statement form signed by a medical authority. The statement must be kept on file, handled confidentially and describe:

- The participant's disability and an explanation of why the disability restricts the participants diet;
- The major life activity affected by the disability;
- The food or foods to be omitted from the participants diet; and
- 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 recognized medical authority.

Note: Reimbursement for meals served with documented food substitutions are claimed at the same reimbursement rate as meals which 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 an institution is serving a child with special dietary needs that are not a disability, the parent/guardian may request substitutions by submitting an accurately completed Medical Statement to Request Special Meals and/or Accommodations form, signed by a recognized medical authority, 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.

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, even when accompanied by a medical statement. The facility may make such substitutions at its discretion, but not required. A written request for a fluid milk substitution must be made by a medical authority, parent/guardian and 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	500 IU.
Vitamin D	100 IU.
Magnesium	24 mg.
Phosphorus	222 mg.
Potassium	349 mg.
Riboflavin	0.44 mg.
Vitamin B-12	1.1 mcg.

Non-Dairy Beverages that meet USDA Substitution criteria per eight fluid ounces include:

- **8th Continent:** Original, Vanilla, and Light Chocolate Soymilk.
- **Pacific Natural:** All Natural Ultra Original and Vanilla Soymilk.
- **Kikkomon:** Pearl Organic Soymilk Smart Original, Creamy Vanilla and Chocolate.
- **Wal-Mart Great Value:** Original Soymilk.
- **Sunrich Naturals:** Original and Vanilla Soymilk.
- **Silk:** Original Soymilk.
- **Ripple:** Original, Vanilla, and Chocolate plant-based milk.

*Non-dairy beverages served to children one to five years of age must be unflavored.

Note: 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.

Any reasonable parent/guardian written request for a non-dairy milk substitution could be accepted at the discretion of the center, as described above, without providing a medical statement. As an 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 fluid milk substitute. 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.

For additional information, Sections 7.4A and 7.4B in the At-Risk Afterschool Program Policy Manual; FNS Instruction 783-2, Rev. 2 *Meal Substitutions for Medical or Other Special Dietary Reasons and Memorandum SP 13-2015, CACFP 13-2015, SFSP 15-2015, Statement Supporting Accommodations for Children with Disabilities in Child Nutrition Programs.*