



Date: December 30, 2024

Memo code: SP 07-2025, CACFP 07-2025

Subject: Requirement to Accept Medical Statements from Registered Dietitians for Schools and Child and Adult Care Institutions and Facilities

To: Regional Directors, Child Nutrition Programs, All Regions
State Directors, Child Nutrition Programs, All States

On April 25, 2024, the U.S. Department of Agriculture's (USDA) Food and Nutrition Service (FNS) published the final rule, *Child Nutrition Programs: Meal Patterns Consistent With the 2020-2025 Dietary Guidelines for Americans* ([89 FR 31962](#), April 25, 2024). The rule finalized practical, science-based, long-term school nutrition requirements consistent with the goals of the *Dietary Guidelines for Americans, 2020-2025 (Dietary Guidelines)*, extensive partner input, and lessons learned from prior rulemakings. The final rule also included minor updates to the Child and Adult Care Food Program (CACFP) and Summer Food Service Program (SFSP) to better align Child Nutrition Program (CNP) requirements. These updates represent continued progress toward supporting the nutritional quality of school meals, strengthening the CNPs, and advancing USDA's commitment to nutrition security.

This memorandum and the attached Questions and Answers (Q&A) clarify the updated regulatory requirement for Program operators to accept medical statements from registered dietitians. This requirement applies to Program operators of the National School Lunch Program and School Breakfast Program (collectively, the school meal programs) ([7 CFR 210.10\(m\)\(1\)\(i\)](#), [220.8\(m\)](#)) and the CACFP ([7 CFR 226.20\(g\)\(1\)\(i\)](#)). The change requiring Program operators to accept medical statements from registered dietitians must be implemented by July 1, 2025, for school meal programs and October 1, 2025, for CACFP.

Program operators have the option, but are not required, to implement this change prior to the implementation dates.

With the final rule, USDA is balancing the importance of improving participant access to meals that meet their individual needs with the importance of ensuring that Program operators have the information necessary to keep participants safe.

State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agencies should direct questions to the appropriate FNS Regional Office.

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for
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Attachment**Questions and Answers****1. When is a medical statement required to support meal modification requests for disability reasons?**

A medical statement is only required by USDA when the requested modification cannot be accomplished within the Program meal pattern requirements ([7 CFR 210.10\(m\)\(1\)\(i\)](#), [220.8\(m\)](#), and [226.20\(g\)\(1\)\(i\)](#)). However, Program operators may choose to require a written medical statement for all disability meal modifications, even those that fall within the Program meal pattern requirements. Program operators should consider the burden of requiring medical statements and must inform parents, guardians, and their children, if age appropriate, of the process for requesting meal modifications ([7 CFR 210.10\(m\)\(1\)\(ii\)](#), [220.8\(m\)](#), and [226.20\(g\)\(1\)\(i\)](#)).

2. In situations when a medical statement is necessary, what must be included in the medical statement?

A medical statement must include:

- Information about the participant's disability that allows the Program operator to understand how the disability restricts the participant's diet,
- An explanation of how to accommodate the participant's disability, and
- The food or foods that must not be served as well as recommended alternatives, in the case of a modified meal.

3. Which professionals may submit medical statements on behalf of participants with disabilities?

State licensed healthcare professionals and registered dietitians may write medical statements to request meal modifications on behalf of participants with disabilities in the school meal programs ([7 CFR 210.10\(m\)\(1\)\(i\)](#)) and CACFP ([7 CFR 226.20\(g\)\(1\)\(i\)](#)). The

requirement to accept medical statements from registered dietitians must be implemented by July 1, 2025, for school meal programs, and October 1, 2025, for CACFP. Program operators have the option, but are not required, to implement this change prior to the implementation date.

4. How is “State licensed healthcare professional” defined in school meal program and CACFP regulations?

A State licensed healthcare professional is defined as an individual who is authorized to write medical prescriptions under State law ([7 CFR 210.2](#) and [226.2](#)). This may include, but is not limited to, a licensed physician, nurse practitioner, or physician assistant, depending on State law. Program operators should contact their State agency with any questions about which professions are included in this definition within their State.

5. Who is a “registered dietitian” or “registered dietitian nutritionist”?

The terms “registered dietitian” (RD) and “registered dietitian nutritionist” (RDN) are equivalent credentials. Both are nutrition healthcare practitioners, credentialed by the Commission on Dietetic Registration. RDs and RDNs are required to complete specific educational requirements, from an accredited dietetics program, including a supervised practice requirement; pass a national exam; and continue learning through ongoing education. In addition to RD/RDN credentialing, many States have regulatory laws and licensure requirements for RDs.

6. Are RDs providing medical statements required to be licensed?

No. Only RDs who practice in States that require State licensure must be licensed. Some States do not have licensing requirements and are therefore excepted (see [map](#)). Most States require RDs to hold a State license or certification to legally practice or use a protected title within that State. Requirements vary from State to State. Visit this

Academy of Nutrition and Dietetics' website for more information: [licensure map and statutes by State](#).

7. Are RDs who are employed by local Program operators or State administering agencies allowed to write medical statements for participants?

RDs submitting medical statements must follow their State regulations as well as the Code of Ethics for the Nutrition and Dietetics Profession. As a best practice, healthcare professionals submitting medical statements should have an established professional-patient relationship with the individual requesting the reasonable accommodation. Program operators with questions should contact the State administering agency for assistance.

8. Can Program operators accept medical statements from healthcare professionals licensed in a different State than where the school, child and/or adult care institution, or facility serving the participant is located?

USDA regulations do not require healthcare professionals providing medical statements to be licensed by and operating in the State where the school, child and/or adult care institution, or facility serving the participant is located. However, individual States may have these requirements. Healthcare professionals must adhere to the healthcare regulations for the States in which they are licensed. Program operators are strongly encouraged to communicate with State agencies administering the Child Nutrition Programs in their State should they require tailored guidance.

Resources¹

School Meal Programs (NSLP and SBP)

- Meal Modifications Section 14 of [Final Rule \(89 FR 31962\)](#), April 25, 2024)

¹ As of memorandum publication, some resources on this list may require updates to fully align with current Program regulations.

- [Fluid Milk Requirements for School Meals](#)
- [2017 Edition of Accommodating Children with Disabilities in the School Meal Programs](#)
- [Accommodating Disabilities in the School Meal Programs: Guidance and Q&As](#)
- [Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs](#)

CACFP

- Meal Modifications Section 14 of [Final Rule \(89 FR 31962, April 25, 2024\)](#)
- [Modifications to Accommodate Disabilities in the CACFP and SFSP](#)
- [Nutrition Requirements for Fluid Milk and Fluid Milk Substitutions in the CACFP, Questions and Answers](#)
- [Feeding Infants and Meal Pattern Requirements in CACFP: Questions and Answers](#)