

Requirement to Accept Medical Statements from Registered Dietitians for Schools and Child and Adult Care Institutions and Facilities: North Carolina-Specific Program Information and Guidance for School Food Authorities

SP07-2025 Questions and Answers (adapted from USDA with North Carolina-specific guidance)

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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, School Food Authorities (SFAs) may choose to require a written medical statement for all meal modifications related to a documented disability, even meal modifications that meet the Program meal pattern requirements. SFA should consider the potential 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 student's disability that allows the SFA to understand how the disability restricts the student's diet,
- An explanation of how to accommodate the student's disability, and
- The food or foods that must not be served as well as recommended alternatives, in the case of a modified meal.

Using the North Carolina Medical Statement Form can help ensure compliance with these required elements.

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

State licensed healthcare professionals and Registered Dietitian Nutritionists (RD/RDNs) may write medical statements to request meal modifications on behalf of students 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 Dietitian Nutritionists (RD/RDNs) must be implemented by July 1, 2025, for school meal programs, and October 1, 2025, for CACFP.

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 current State law

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 professionals, credentialed by the Commission on Dietetic Registration. RDs and RDNs are required to complete specific

educational requirements, from an ACEND accredited dietetics program, including a supervised practice requirement; pass a national exam; and continue learning through ongoing continuing education. In addition to RD/RDN credentialing, many States have regulatory laws and licensure requirements for RDNs.

6. Are RD/RDNs providing medical statements required to be licensed?

Under the Federal rule, no. Only RD/RDNs 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 RD/RDNs to hold a State license or certification to legally practice or use a protected title within that State. **NORTH CAROLINA:** The State of North Carolina does require Registered Dietitian Nutritionists (RD/RDNs) to hold an active license with the NC Board of Dietetics/Nutrition to provide Medical Nutrition Therapy (MNT) and use specific titles. However, the law also provides for some exemptions from this requirement, for state-funded or federally funded RD/RDN positions. For example, if a medical statement is coming from an RD/RDN at an NC-county health department, that RD/RDN is not required to be licensed because they are exempt under NCGS § 90-368(5) for working in a State-funded position. If a medical statement is coming from an RD/RDN in private practice, that RD/RDN should have the credential "Licensed Dietitian/Nutritionist (LDN)" because they are required to be licensed in NC to provide MNT and are **not** in an exempt position. For further guidance, please contact your School Nutrition Consultant.

7. Are RD/RDNs who are employed by SFAs or the State administering agencies (NCDPI Office of School Nutrition for NSLP/SBP; NCDHHS for CACFP) allowed to write medical statements for students?

RD/RDNs 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.

NORTH CAROLINA: See above for whether an RD/RDN requires a license under NC State law. Under NCGS §90-368(3) or (5) an RD/RDN may be working in an exempt position. For further guidance, please contact your School Nutrition Consultant.

8. Can SFAs 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 student 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 student is located. **NORTH CAROLINA:** The requirement of licensure is based upon where the care is being **received**. Therefore, if an RD/RDN is providing MNT for a participant physically located in North Carolina, that RD/RDN would require an active NC Licensed Dietitian/Nutritionist license (LDN), regardless of where the RD/RDN physically lives or works if outside of North Carolina.

Resources ¹

School Meal Programs (NSLP and SBP)

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

Registered Dietitian Credentialing Licensure

- [Commission on Dietetic Registration \(CDR\)](#) – the credentialing organization for Registered Dietitians/Registered Dietitian Nutritionists
 - [Verify an individual credential](#)
 - [Code of Ethics and Complaints](#)
- [North Carolina Board of Dietetics/Nutrition \(NCBDN\)](#) – the state licensure organization for Licensed Dietitian Nutritionists (LDN)
 - [Verify an individual license](#)
 - [Report a complaint](#)

Nutrition Certifications, Credentials, and Licensure Definitions

Table 1: Nutrition Credentials Accepted and Not Accepted under 7 CFR 210.10(m)(1)(i)

Nutrition Credentials Accepted under 7 CFR 210.10(m)(1)(i)	Nutrition Credentials Not Accepted under 7 CFR 210.10(m)(1)(i)
Registered Dietitian (RD)	CNS (Certified Nutrition Specialist)
Registered Dietitian Nutritionist (RDN)	DACBN (Diplomat of the American Board of Nutrition)
Registered Dietitian, Licensed Dietitian/Nutritionist (RD, LDN)	Nutrition and Dietetics Technician, Registered (NDTRs)
Registered Dietitian Nutritionist, Licensed Dietitian/Nutritionist (RDN, LDN)	Health Coach
	LN (Licensed Nutritionist) [NC-specific]
	CNC (Certified Nutrition Coach)

Definitions ²

- **Registered Dietitian Nutritionist (RDN):** An individual registered with the Commission on Dietetic Registration. Review the complete definition of a Registered Dietitian Nutritionist (RDN) in the [Definition of Terms List provided by the Commission on Dietetic Registration](#). For additional information, review this [fact sheet about becoming a Registered Dietitian Nutritionist](#).
- **Registered Dietitian (RD):** Equivalent to the Registered Dietitian Nutritionist (RDN) credential.
- **Nutrition and Dietetics Technician, Registered (NDTR):** An individual registered with the Commission on Dietetic Registration. Review the complete definition of a Nutrition and Dietetics Technician, Registered (NDTR) in the [Definition of Terms List provided by the Commission on Dietetic Registration](#). For additional information, review this [fact sheet about becoming a Nutrition and Dietetics Technician, Registered](#).
- **Dietetic Technician, Registered (DTR):** Equivalent to the Nutrition and Dietetic Technician, Registered (NDTR) credential.
- **Certified Nutrition Specialist (CNS):** An individual certified by the Board for Certification of Nutrition Specialists.
- **Certified Nutrition Coach (CNC):** An individual that obtains a Certified Nutrition Coach credential through the National Academy of Sports Medicine (NASM). This certification is not recognized in North Carolina in terms of the ability to use the protected titles “registered dietitian” and “nutritionist,” or the ability to provide medical nutrition therapy.
- **Health Coach:** This is a generic term for someone who generally guides and encourages people to adopt and maintain a healthy lifestyle, a goal they have set for themselves. This person is not a State-licensed registered dietitian or nutritionist and does not hold himself or herself out to be a dietitian or nutritionist.
- **Diplomat of the American Board of Nutrition (DACBN):** An individual certified by the American Clinical Board of Nutrition.
- **Licensed Dietitian/Nutritionist (LDN):** An individual licensed in good standing to practice dietetics, nutrition, or both. This person must also be an RD/RDN (see above). For more information, please review this [summary of nutrition-related licensure in North Carolina](#).
- **Licensed Nutritionist (LN):** An individual licensed in good standing to practice nutrition. This person must be a CNS (see above). For more information, please review this [summary of nutrition-related licensure in North Carolina](#).

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

² Reference: NC General Statute § 90-352; Commission on Dietetic Registration (<https://www.cdrnet.org/use-misuse> and <https://www.cdrnet.org/rdncredentialfaq>)