

Special Dietary Needs Tip Sheet

Gluten-Free, Vegetarian, Vegan, Lactose Intolerance, Major Food Allergens, and Other Dietary Patterns

This tip sheet is designed to align with the most current Dietary Guidelines for Americans (DGAs) and to help nutrition professionals plan menus that accommodate common dietary needs and preferences without requiring individualized clinical intervention. It covers five categories that menu planners encounter regularly, including gluten-free eating, vegetarian and vegan patterns, lactose intolerance, and the nine major food allergens recognized under federal law.

The goal of this sheet is to provide a reference that consolidates sourcing, labeling, and cross-contact considerations across dietary categories that are often documented separately, so that accommodations can be planned consistently. This tip sheet does not cover medically tailored nutrition therapy (e.g., renal, diabetic, cardiac, etc.), which requires individualized guidance from a registered dietitian rather than general menu substitutions.

Providers are encouraged to accommodate special dietary needs when feasible. However, some highly specialized meals may not be possible within the program's available resources and services.

Gluten-Free

Gluten-free is a medical sensitivity accommodation, not a nutrient guideline distinction. The DGAs do not differentiate by gluten content, so compliance here means safe substitution within existing grain targets, not a different nutrient target.

DGA Grains Target	Gluten-Free Swap
≥ 3 oz eq whole grains per day	Certified gluten-free oats, brown rice, quinoa, buckwheat, certified gluten-free whole grain bread or pasta
< 3 oz eq refined grains per day	Gluten-free labeled refined pasta, rice-based products

Menu planning notes:

- Cross-contact is the primary risk, not ingredient formulation alone. Dedicated prep surfaces and utensils, or verified gluten-free certified purchasing, are necessary for a genuine gluten-free claim.
- Soy sauce, malt vinegar, breading, roux, and broth bases are common hidden-gluten points. Be sure to check these items before labeling a dish as gluten-free.

- Important note: meat, fruits, vegetables, and dairy products without added ingredients are naturally gluten-free.

Vegetarian and Vegan

The current DGAs do not have a standalone vegetarian dietary pattern. Use the general food pattern and substitute within the protein foods and dairy/fortified soy alternatives groups.

Protein Component	Vegetarian Options	Vegan Options
Meat and poultry	Eggs, dairy-based proteins (e.g., cottage cheese, Greek yogurt), veggie burgers, plant-based “chicken”	Tofu, tempeh, seitan, jackfruit, mushroom-based proteins
Eggs	Whole eggs or egg whites	Tofu scramble, chickpea flour egg substitute, commercial egg replacers for baking
Seafood	Can keep seafood if pescatarian, otherwise no alternative	Seaweed/nori can substitute for flavor profile in some dishes, but no nutritional value
Nuts and seeds	Core protein source: almonds, walnuts, sunflower seeds, pumpkin seeds, nut butters	Core protein source: almonds, walnuts, sunflower seeds, pumpkin seeds, nut butters
Soy products	Tofu, tempeh, edamame, soy-based meat products	Tofu, tempeh, edamame, soy-based meat products
Beans, peas, and lentils	Core protein source: black beans, chickpeas, lentils, split peas, kidney beans	Core protein source: black beans, chickpeas, lentils, split peas, kidney beans

Dairy Component	Vegetarian Options	Vegan Options
Milk	Dairy milk (whole, reduced-fat, fat-free)	Fortified soy milk (closest protein match to dairy); fortified pea milk (comparable protein); fortified oat, almond, rice, or coconut milk (lower in protein, supplement protein elsewhere)

Cheese	Dairy cheese (all varieties)	Fortified soy-based cheese, tofu-based ricotta or cream cheese alternatives; nutritional yeast for cheese-like flavor (not a direct swap, lower in calcium and protein)
Yogurt	Dairy yogurt (plain, Greek preferred for protein)	Fortified soy yogurt (best protein match), fortified pea-protein yogurt; coconut or almond yogurt (lower in protein, pair with another protein source)
Butter	Dairy butter	Plant-based butter or margarine (check for added allergens like tree nuts)

Nutrients to Plan Around

- B12 — absent from plant foods; requires fortified products (e.g., fortified soy milk, fortified cereals) or supplementation for vegan menus.
- Iron and zinc — pair plant iron sources (e.g., legumes, fortified grains) with vitamin C-rich foods to aid absorption.
- Complete protein coverage — varying protein sources across the week (e.g., legumes + grains + nuts and seeds) rather than requiring complementary proteins at a single meal.
- Calcium — fortified soy milk or yogurt, tofu set with calcium sulfate, calcium fortified juices if dairy and soy are both excluded.

Lactose intolerance

Distinct from a milk allergy, this is a digestive enzyme issue, not an immune response, and tolerance is often dose-dependent rather than all-or-nothing.

Rather than eliminating dairy, official nutrition guidance recommends that people with lactose intolerance still work in three daily servings of dairy, using lactose-free or reduced-lactose options rather than full avoidance.

Menu Options

In order of typical tolerance:

- Hard, aged cheeses (naturally low in lactose)
- Yogurt with live active cultures (lactase aids digestion)
- Lactose-free milk and lactose-free dairy products
- Fortified soy milk or yogurt (zero lactose)

Menu planning notes:

- Do not default straight to full dairy elimination for lactose intolerance.
- Offering lactose-free dairy preserves the intended calcium/protein/vitamin D profile better than switching to a non-fortified plant milk.

Most Common Allergies

The Food Allergen Labeling and Consumer Protection Act (FALCPA) (2004) and the Food Allergy Safety, Treatment, Education, and Research Act (FASTER Act) (2021) require that the nine major food allergens (milk, egg, fish, crustacean shellfish, tree nuts, peanuts, wheat, soybeans, sesame) be clearly disclosed on food labels in the U.S. This allows nutrition programs to read labels for commonly found allergens.

Allergen	Common Hidden Sources
Milk	Casein, whey, ghee, butter flavoring
Egg	Mayonnaise, some pastas, glazes, meringue
Fish	Worcestershire source, Caesar dressing, fish sauce
Crustacean shellfish	Broths, stocks, flavoring bases
Tree nuts	Nut oils, pesto, some cereals, cross-contact in bakeries
Peanuts	Sauces (satay, some Asian cuisines), baked goods
Wheat	Soy sauce, roux, malt, breading, thickeners
Soybeans	Vegetable oil blends, lecithin, some broths
Sesame	Tahini, hummus, some breads/buns, spice blends

Menu planning notes specific to sesame:

- Sesame labeling was not required until 2023. This is important to know because some labels may predate this requirement. Good practice is to always scan ingredients on labels to ensure the allergen or common hidden sources are not present.
- Some bakery supply chains use sesame flour as an inexpensive wheat-flour extender.

General allergen protocol for menus, regardless of which of the nine:

- Keep an up-to-date list of ingredients and allergens for each menu item and update it whenever something changes.
- Always scan ingredients on labels to ensure the allergen or common hidden sources are not present, and recheck ingredient lists on products. A product may be allergen-free the first time you buy it. The next time, the ingredients could have changed.

- Allergen-free claims on labels are not regulated, and the product may be made in a facility where the allergen is present, causing possible cross-contamination.
- Keep track of whether the product “contains” or “may contain” an allergen.
 - When a label states “contains” an allergen ingredient, it means the allergen is confirmed in the product.
 - When a label states “may contain” an allergen ingredient, it means there was a possibility of cross-contact during production
 - Remember, these claims are not mandatory or regulated. The absence of this statement does not mean that the product has had no cross-contact.
- Provide training to staff when allergies are present. It is important that staff identify major food allergens, prevent cross-contact, and communicate effectively.
- Always remember that shared cooking equipment (e.g., toasters, fryers, grills, cutting boards, etc.) often can cause cross-contamination.

Other Special Dietary Patterns

There are other nutrition guidelines that may require certification and facility protocols rather than nutrient substitution. Below are a couple of more common patterns that may help with menu planning.

Kosher (Kashrut)

Core structure: All foods fall into three categories — meat, dairy, or neutral. Meat and dairy can never be prepared, served, or eaten together.

Category	Category Includes	Menu Implication
Meat	Kosher-slaughtered mammals, poultry meeting kashrut criteria	Requires certified sourcing; cannot share equipment or service with dairy
Dairy	Milk, cheese, yogurt, butter from a kosher animal	Requires certification even when “just milk,” since kosher status depends on production oversight, not just ingredients
Pareve	Fish (with fins and scales), eggs, vegetables, fruits, grains, legumes	Neutral — can be served with either meat or dairy meals

Menu planning notes:

- A product being vegetarian or “non-dairy” by FDA labeling standards does not make it pareve or kosher. Kosher status requires certification of the full production chain, not just the ingredient inspection.
- Genuine kosher service requires separate equipment, utensils, and pre/storage areas for meat and dairy. This is a facility-level commitment, not a recipe-level swap. If you are not operating a certified kosher kitchen, label items “kosher-style” rather than “kosher” to avoid misrepresenting observant-level compliance.

- Fish must have both fins and scales to be kosher (e.g., shellfish and most non-scaled fish are excluded), and it is not eaten together with meat, though it may be served alongside meat as a separate course.
- Recognized certifying agencies include the Orthodox Union, Star-K, and the Chicago Rabbinical Council. Look for these symbols on supplier products rather than assuming “kosher-adjacent” claims are equivalent.
- Observance levels vary by community. Confirm acceptable certifications and practices with that community rather than assuming a single standard.

Halal

Core Structure: Foods are halal (permissible) or haram (forbidden), governed by slaughter method, ingredient sourcing, and absence of prohibited substances. Pork and alcohol are the clearest exclusions, but hidden sourcing issues are the more common compliance risk.

Requirement	Details
Slaughter	Meat and poultry must come from animals slaughtered according to the Islamic method. Humane slaughter with a specific invocation, by an authorized method.
Alcohol	Ethanol beverage alcohol is prohibited as an ingredient. Some non-intoxicating alcohols (e.g., processing/cleaning agents) may be treated differently depending on the certifying body. Do not assume, verify.
Gelatin	Permitted only if sourced from a halal-slaughtered animal or a halal source (fish, plant). Pork-derived or non-zabiha gelatin is not acceptable.
Cross-Contact	Facilities must avoid contact between halal and non-halal (especially pork) products across shared equipment and storage.

Menu planning notes:

- Hidden risk points mirror kosher’s but are not identical. Rennet in cheese, gelatin in desserts, alcohol-based extracts (e.g., vanilla) or wine-based sauces, and Worcestershire or fish sauces are common, unexpected sources of non-halal ingredients.
- Kosher-certified is not automatically halal-equivalent. Kosher gelatin can be pork-derived under kosher rules in some cases, and kosher certification says nothing about alcohol content, which halal certification specifically restricts.
- Certification in the U.S. isn't centralized the way FDA allergen labeling is; multiple certifying bodies exist (e.g., Halal Food Standards Alliance of America, USA Halal Chamber of Commerce) with somewhat different standards, particularly around trace-alcohol tolerance and machine vs. hand slaughter. If serving a defined population, confirm which certification(s) your audience or institution accepts.
- As with kosher, "halal-style" or "no pork/no alcohol" labeling is more honest than an unverified "halal" claim if you don't have certified sourcing and facility controls in place.

Where Kosher and Halal Overlap

- Both exclude shellfish/pork-adjacent cross-contact concerns.
- Vegetarian and vegan dishes are not automatically kosher or halal. Verify the presence of rennet, gelatin, and alcohol-based ingredients, even in plant-forward dishes.

Resources

- [Plant-Based Diets](#) (Nutrition and Aging Resource Center)
- [Food Allergen Labeling Consumer Protection Act \(FALCPA\)](#) (FDA)
- [FASTER Act, 2021](#) (Congress.Gov)
- [Supporting Kosher and Halal Communities](#) (USDA)
- [General Nutrition Resources, Recipes, and Healthy Eating Guidance](#) (USDA)
- [ACL Nutrition Services and OAA Requirements](#) (ACL)