

Knox County Schools

Food & Nutrition Services

Special Dietary Accommodations Protocol

2019-20



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Introduction

Food allergies are common within the United States, but may create a challenge for school cafeterias. Many children with allergies are at risk for anaphylaxis, which is life threatening. Due to the fact that deaths have occurred in schools across the U.S. from allergic reactions, strict avoidance of food allergens is extremely important. Staff must be aware that even trace amounts of a food allergen can cause allergic reactions for some students.

Additionally, many children have food intolerances or sensitivities, which may impact gut health and other bodily functions. Celiac Disease and other food intolerance/sensitivity diagnoses are on the rise in the US.

USDA requires that schools accommodate children with any type of documented food restriction under the American Disability Act and ADA Amendment Act of 2008. Managing allergies and other food restrictions requires **ALL** employees to be aware of this protocol, as well as, techniques required to provide safe food for these children.

Collaboration with students, parents/guardians, cafeteria staff, registered dietitians, nurses, and principals, is an important part of the process to ensure adequate safety precautions are taking place and the child is being accommodated appropriately.

Regulatory Requirements

- ADA Amendment Act of 2008 and SP 59 – 2016 (Appendix A)
Term disability is defined as:
 - A physical or mental impairment that substantially limits one or more major life activities
 - A record of such impairment (See Medical Documentation)
 - Being regarded as having such impairment
- SP 59 – 2016 (Appendix A) -This USDA update for School Food Authorities (SFA) requires broader coverage for food restrictions :
 - Broadened the term 'disability' to include children with non-life threatening sensitivities or allergies
 - Restrictions must be documented by a state licensed individual who has prescription writing privileges (MD, NP, APRN, Dentist, DO, PA, Podiatrist)
- The National School Lunch Program (NSLP) and School Breakfast Program (SBP) mandate that all students are provided access to meals regardless of recorded disability status
- Reasonable modifications must be made for children with medical orders (including allergies) at no extra charge to the child

Medical Documentation

- According to the USDA, a meal modification that does not follow the program meal pattern **MUST** have a medical statement to receive reimbursement.
- Knox County Schools (KCS) **DOES** require a medical statement for any restriction(s) or modification whether or not it is within the meal pattern

Medical Documentation continued...

- The KCS Special Dietary Accommodations form (FSD-49) can be found at the end of this document (Appendix C) or may be obtained from the school nurse. However, any form can be used for the medical documentation as long as it includes the following:
 1. Information on impairment that is sufficient to allow the SFA to understand how it restricts the child's diet, and an explanation of what must be done to accommodate the child's disability
 2. Foods to be omitted
 3. Recommended substitutions to replace omitted food items (**may check subs statement on form**)
 4. Signature of an individual who is authorized to write medical prescriptions in the state of Tennessee (this includes, Physicians, Physician Assistants, Advanced Practice Registered Nurse/Nurse Practitioner, Podiatrist, Osteopathic Physician, Dentist, Optometrist, Veterinarian)
- If one of the items is not included in the medical statement, accommodations SHOULD NOT be delayed. Staff should follow the clear areas of the medical statement and request an amended medical statement from the parent. Full accommodations will occur once all information is received, reviewed, and a full accommodation plan is in place specific to each child's restrictions.
- Forms signed by parent ARE NOT accepted without medical provider signature

Students without Medical Documentation

- If the SFA is aware of a food restriction(s), staff cannot unduly delay providing modifications while awaiting the medical statement. Instead, staff should provide reasonable modifications to keep the child safe and request the family provide a medical statement as soon as possible (cafeteria may not be able to provide all meal components)
- Requests to provide a medical statement from the parent should be documented (See School Office, Cafeteria &/or Nurse to obtain form)
- All modifications outside the meal pattern will be accommodated per medical order. In the meantime, staff should be aware of possible allergens and provide foods that are safe for each child (although they may be limited). Parents may choose to pack or supplement with foods from home until full accommodations are in place. This will require close communication between parent and cafeteria. Managers should contact the school nurse and/or the district-wide nutritionist if they need clarification about medical orders:

Knox County Schools Nutritionist

Carolyn Perry-Burst, MS, RD, LDN

phone: 865.594.3801 **fax:** 865.594.1203 **email:** carolyn.perryburst@knoxschools.org

Release Statements

- If the parent/guardian wants the child to be served foods that are otherwise restricted on the medical form, they must fill out, sign, and return the *KCS Parental Release* statement (Appendix B).
- Staff must follow the medical order until release statement is signed and returned by parent.

Communication with Parents

- USDA requires the SFA to notify families of the process for requesting meal modifications and the individual responsible for coordinating modifications.
- Information should be available online to allow parent access to instructions on the process of diet modifications in the National School Lunch Program and School Breakfast Program.
- Parents may access food menus and online food product items lists, which list calories and nutrients (including carbs and sodium), along with allergens (included are those most common to our system needs). Parents/students may review and determine best food options until documentation, if needed, is in place.
- Communication between staff and parents can minimize confusion and streamline the process to approve modified diets and get medical requests in a timely manner.

Children with 504/IEP that Includes Dietary Accommodations

- If possible, someone from School Food & Nutrition Services (SFNS) will attend all meetings that have a food-related component that will require dietary modification.
- SFNS will provide accommodations specified in the medical form including substitutions, restrictions, specialty items, individualized menu, etc.
- If at all possible, all members of the school team (nutritionist, school nurse, parents/guardians cafeteria manager, teacher, and principal or other administrative representative) should attend meetings.

Milk Substitutions

- In order for the SFNS to receive reimbursement for milk substitutions, federal regulations require that we provide substitutes with the same nutritional profile as dairy milk.
- Child must have medical documentation for any milk sub variation including soy, lactose free, almond, etc. Milk substitutions are made as noted below:
 - Milk protein allergy: soy milk provided
 - Milk Lactose Intolerance: Lactose-free milk provided
 - Milk + Soy Allergies: Almond milk provided (not reimbursable)
 - Other milk substitutions provided per medical order
- Manager should contact nutritionist to prevent delay in accommodating child, but continued requests for medical form from doctor should be made (Nurse).
- We do not provide specific brand requests from parents or doctors (i.e. "Silk Soy" or "Almond Breeze Almond Milk"), but do provide alternatives, per medical order.

Lifestyle Accommodations

- We are not required by the USDA to provide special food items for students based on lifestyle choice (vegetarian, religious, etc.), but strive to offer enough variety for these families who decide to eat meals from the cafeteria.

Lifestyle Accommodations continued...

- Our menus offer a variety of meat choices and non-meat options, such as daily PBJ & Soy Butter & Jam Sandwiches, as well as many cheese entrée items. Therefore, Offer vs. Serve should allow most of these accommodations to be met.
- We do not provide oversight for children's food choices regarding lifestyle accommodations. However, parents may request a copy of our menu and visit our menu webpage to find a listing of our foods that will provide more detail of ingredients/allergens. Parents are encouraged to discuss menu options and selections with their children to assist them in making choices that meet their lifestyle needs.

Offer Vs Serve

- According to USDA regulations, children with disabilities must have access to all food components available to other children (grain, meat/meat alternative, vegetable, fruit, milk/milk substitute). Therefore, Offer vs. Serve cannot be used to meet children's restrictions when Offer vs. Serve does not allow child access to safe options for all components.
- Cafeterias cannot eliminate meal components that are offered to other children (i.e. if other children get a roll with meal, a gluten free child must be accommodated with gluten free bread choice), unless multiple restrictions do not allow for provision of food components. In this case other foods will be added to the child's special menu to ensure adequate calorie and nutrient intake.

Family Responsibilities

- Notify the school of the child's allergies through the school nurse and/or cafeteria.
- Provide foods free of allergens at home and review with your child, foods that are safe and available at school (obtain approved food lists from cafeteria, RN, or Central Office RD).
- Provide accurate written and signed medical documentation, instructions, medications, and medical orders, as requested by school, and updated information and medicines, as requested by school nurse.
(Dietary Accommodation Form-Appendix C)
- Work with the school team to develop a plan that accommodates the child's needs.
- Work with cafeteria staff and district nutrition services to ensure safe school meal options are selected if the child eats at school.
- Notify school of updates or changes in the child's care plan, emergency action plan, or medical orders.
- Notify school when moving, and be responsible for transfer of necessary information, paperwork, and medical documentation.
- Meet with or contact school's nurse and cafeteria before child attends a new school (includes transfer or moving up a school level) to ensure all medical paperwork is in place.
- If a special meal is being made for child (i.e. the child does not select all foods from the line, but must ask staff for a tray), the family should review the special menu with the child and notify cafeteria staff of absences.
- Educate the child in self-management of his/her allergy (as age appropriate):
 - ✓ Safe and unsafe foods
 - ✓ Symptoms of an allergic reaction
 - ✓ How and when to tell adult if they are having an allergic reaction
 - ✓ How to read food labels
 - ✓ The importance of not eating foods from other children
 - ✓ If applicable, inform child that he/she is expected to pick up specially prepared cafeteria trays at school and help child establish contact with the cafeteria manager.

Student Responsibilities

Pre-K & Elementary School:

- Should not trade or share foods with others
- Should not share utensils with others
- Should notify adult immediately if they eat something they believe may contain food to which they are allergic
- Should notify adult if they are being bullied or threatened by another student as it relates to their allergy
- Should pick up specially prepared tray from the cafeteria line

Middle & High School:

- Should communicate with nurse and cafeteria staff regarding meal restrictions/modifications
- Should be aware of their allergy/restriction and use food lists provided by schools when determining what they can have in the cafeteria
- If special menu or tray is made for student, tray should be picked up in the cafeteria
- If special meal is being made for child, cafeteria should be notified by either student or parent of absences
- If student brings lunch some days, a schedule should be made between student/family and staff
- Student should notify adult immediately if they eat something they believe may contain food to which they are allergic

Cafeteria Responsibilities

- Keep each child's meal modification/dietary order information in a designated location within the food prep area where staff may easily access it (but not visible to public)
- Use food list forms made by nutritionist to assure safe food is served to meet child's dietary request
- Identify each child's teacher and meal service time; along with child's name, note teacher & meal time on the special dietary foods lists
- Ensure food inventory includes safe food for each child who requires dietary accommodations
- Use specialized menus made by nutritionist for students with numerous restrictions and order special products according to menus (these children may not follow the meal pattern, but menus are designed to meet nutrient and caloric requirements)
- Follow cross-contamination prevention principles to ensure safety
- Upon parent request, work with school staff and parents to provide an "allergy safe" table in the cafeteria, where friend/s may sit as well

Cafeteria Responsibilities continued...

- Carefully monitor foods that are being served to students with restrictions/allergies and read labels as needed
- Communicate with school nutritionist regarding any questions or clarifications related to diet orders and meal modifications
- Under no circumstances should school food service staff diagnose health conditions, prescribe nutritional requirements, interpret, or revise/change a diet order

Nurse Responsibilities

The nurse is the “front line” for communication with parents and students, along with compiling medical documentation that is needed. The nurse must be contacted as soon as a student is identified with an allergy to obtain the dietary request form and/or develop the required Allergy Action Plan.

- Review medication and dietary forms and request updates as required
(Dietary Accommodation Form-Appendix C)
- Contact families of students requiring medical forms and document communication attempts
- Send medical documentation to school dietitian (RD) and provide a copy to the school cafeteria
- Attend 504/IEP meeting as necessary
- Communicate with RD and family, as needed

Teacher Responsibility

- Understand student needs as they relate to cafeteria and classroom
- Call 911 first when allergy related symptoms occur or ingestion is suspected, per established medical protocol
- Know emergency action plan
- Inform teacher substitutes of children with dietary restrictions or modifications and ensure all paper work is current and available
- Review food for field trips and notify cafeteria 2 weeks prior to field trip to ensure food is available for special dietary needs
- Be prepared for special events (parties); work with parents to determine how best to handle foods for special occasions)
- Emphasize hand washing and table surface washing before and after eating or handling food
- Train all students not to share food or eating utensils
- Know the location of all emergency information and medications
- Communicate with students’ parents/guardians and cafeteria workers regarding child’s allergies and needs to be sure all are working together for the child’s benefit
- Attend IEP/504 meeting as necessary

School Nutrition Program/RD Responsibility

- Know ingredients of school foods items
- Annually review food labels or as new foods come into inventory

School Nutrition Program/RD Responsibility continued...

- Compile lists of foods options safe for specific allergy (based on best information available-lists are reviewed at least annually, but reformulation or food substitutions may occur due to food availability and manufacturing changes)
- Make menu accommodations as needed and communicate these changes with cafeteria manager/teacher/nurse/family of student
- Coordinate special food care plan for cafeteria staff, parents, students, and nurse
- Attend IEP/504 meetings as necessary
- Provide guidance/training and consultation to school food service staff on how to modify a child's meals to comply with requirements

Appendix A

Resource Citation

Resource Citation

1. **USDA Accommodating Children with Disabilities in the School Meal Programs, Guidance for School Food Professionals.** 7/28/17. <https://www.fns.usda.gov/2017-edition-accommodating-children-disabilities-school-meal-programs>. Accessed 25 July 2019.
2. **SP 59 2016:** Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs, September 27, 2016 <https://fnsprod.azureedge.net/sites/default/files/cn/SP59-2016os.pdf>. Accessed 25 July 2019.
3. **Equal Employment Opportunity Commission (US). ADA AMENDMENTS ACT OF 2008.** PL 110-325 (S 3406). September 25, 2008. <https://www.eeoc.gov/laws/statutes/adaaa.cfm>. Accessed 15 July 2019.

The Americans with Disabilities Act Amendments Act of 2008 (Amendments Act), effective January 1, 2009, amended the Americans with Disabilities Act of 1990 (ADA) and included a conforming amendment to the Rehabilitation Act of 1973 (Rehabilitation Act) that affects the meaning of disability in Section 504. The standards adopted by the ADA were designed not to restrict the rights or remedies available under Section 504. The Title II regulations applicable to free appropriate public education issues do not provide greater protection than applicable Section 504 regulations. This guidance focuses primarily on Section 504.

Appendix B

Knox County Schools Food and Nutrition Services Parental Release of Dietary Restrictions

Knox County Schools Food and Nutrition Services Parental Release of Dietary Restrictions

School _____

Student's Teacher _____

Statement A- Complete Release from Dietary Restrictions

I, _____ parent/legal guardian of _____ request
(please print name) (circle as appropriate) (please print student name)

that my child be **totally released** from the following dietary restrictions (please list all that apply):

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

Statement B- Partial Release from Dietary Restrictions

I, _____ parent/legal guardian of _____ request
(please print name) (circle as appropriate) (please print student name)

that my child follow **all dietary restrictions** noted on medical order, **with the exceptions of the following foods/beverages**, which are well tolerated at home:

_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

(parent/guardian signature) (date)

(KCS personnel signature) (date)

Appendix C

Knox County Schools Food & Nutrition Services Dietary Request Form

