Introduction

The Bethel Public Schools recognize that food allergies may be life-threatening. For this reason, the district is committed to developing strategies and practices to minimize the risk of accidental exposure to life-threatening food allergens and to ensure prompt and effective medical response should a child experience such an allergic reaction while at school.

The district further recognizes the importance of collaborating with parents and appropriate medical staff in developing such practices and encourages strategies to enable the student to become increasingly proactive in the care and management of his/her food allergy, as developmentally appropriate. To this end, the Bethel Public Schools have developed the following guidelines related to the management of life threatening food allergies for students enrolled in district schools.

The Bethel Public Schools’ Food Allergy Management Plan includes elements of prevention, education, awareness, communication, and emergency response. This district-wide plan is based on a collaborative process and represents a balance between individual, school, and community needs, while fostering normal development of the child. This plan addresses the requirements of CGS 10-217a to effectively manage the health and safety needs of children with life threatening food allergies in schools.

Goals

The goals of the Bethel Public Schools’ Food Allergy Management Plan include:

1. To define a formal process for identifying, managing, and ensuring continuity of care for students with life-threatening food allergies across all transitions, Pre-K through Grade 12.
2. To maintain the health and protect the safety of children who have life-threatening food allergies in ways that are developmentally appropriate, promote self-advocacy and competence in self-care, and provide appropriate educational opportunities.
3. To ensure that interventions and individual health care plans for students with life-threatening food allergies are based on medically accurate information and evidence-based practices.

Identification of Students with Food Allergies

Early identification of students with life-threatening food allergies is important. Bethel Public Schools utilizes strategies for the early identification of students with such allergies in order to facilitate proper planning prior to the beginning of the school year.

First, the district encourages parents/guardians of children with a life-threatening food allergy to notify the school of the allergy, providing as much information about the extent and nature of the food allergy as is known, as well as any known effective treatment for the allergy. In addition, the school nurse collects medical and health assessment information from the child’s parents and health assessment form at the time of Kindergarten registration or the child’s first entry into the Bethel
The Individualized Health Care Plan and the Emergency Care Plan

If the district determines that a child has a life-threatening food allergy, an individualized health care plan (IHCP) and an emergency care plan (ECP) are developed for the child. An IHCP is developed for students with special health needs or whose health needs require daily interventions. The IHCP describes how to meet the child’s health and safety needs within the school environment and should address the student’s needs across school settings. It includes a description of the functional health issues (nursing diagnoses), student objectives (expected outcomes) for promoting self-care and age appropriate independence, responsibilities of parents, school nurse, and other school personnel. An ECP includes the emergency responses for a suspected ingestion of allergens.

The written Individualized Health Care Plan (IHCP) may include the following information:

- Child’s name, date of birth, grade, and teacher
- The nature of the child’s allergy and responses to the allergens
- Necessary prevention measures, including consideration of school activities and settings such as: classroom and cafeteria environments; participation in school food service programs; snacks, birthday and other celebrations; hand-washing; risk management during lunch and recess times; special events; field trips, fire drills, and lockdowns.
- Responsibilities of the school nurse, parent and student
- A plan for communication of the IHCP to all those who are responsible for the child, including substitute teachers
- Training and staff education to be provided by the school nurse
- Methods of informing others who visit the classroom or bring food into the classroom, other students or parents.

The IHCP is reviewed at least annually, or whenever there is a change in the student’s allergy management or emergency response plans, changes in self-monitoring and self-care abilities of the student, or following an emergency event requiring the administration of medication or the implementation of other emergency protocols.

The written Emergency Care Plan provides the following information:

- The child’s name, date of birth, grade, and photo
- The child’s specific allergy
- The child’s sign and symptoms of an allergic reaction
- The physician’s prescribed plan in response to exposure, including medication to be administered in the event of an allergic reaction
- The location and storage of medications and epinephrine auto-injector(s)
- Who will administer the medication (including self-administration options as appropriate)
- Other emergency procedures, such as calling 911, notifying the parents or physician
- Emergency contact information for parents/family and medical provider
Developing the Plans

The district has a formalized process for the development of the IHCP and ECP. This process includes the use of a standardized template for both, with individualization for the particular child and circumstances.

Developing an ICHP and ECP is a collaborative process between the school, family, and the child’s physician. The process starts with the establishment of a primary core team responsible for developing the IHCP and the ECP consisting of the school nurse, parent, and possibly the child, as appropriate, depending on age and grade. The school nurse has lead role on this team. Depending on the age and maturity of the student, and other factors related to the nature and extent of accommodations necessary, the nurse and parent may draw up a draft and meet with an expanded core team that includes the classroom teacher and administrator, and may include the student’s counselor. As necessary or appropriate, other relevant school staff may be included.

The school nurse and parent review available information about the student and food allergy and the student’s history of exposure to the food allergens. The school nurse obtains current medical information, including the physician’s response to the Bethel Public Schools’ medical questionnaire, diagnostic information about the presence of food allergy, a prescribed emergency response, including medications, dosages, and any other medical prescriptive information or recommendations. Such medical information should be provided to the school by the physician each year, and kept current by the parent and physician during the year should the child’s needs change. The primary and expanded core teams consider developmentally and age appropriate accommodations and draft language for consideration at the core team meeting. While health care providers can offer recommendations for the types of accommodations needed in the school setting, it is the core team’s responsibility for the development and choice of these recommendations based on the student’s needs and the school environment for the student. Based on the student’s health status, the team determines the minimum frequency with which health information will be reviewed and the plan updated accordingly.

The IHCP and ECP are communicated to all school staff who have responsibility for the student with life-threatening food allergies. The original plan remains in the child’s confidential health record. A student identified as having a life-threatening food allergy is entitled to an IHCP and an ECP, regardless of his/her status as a child with as disability, as that term is understood under Section 504 or the IDEA. If or when a child is believed to have a disability, the team should refer the child to appropriate team, the Section 504 Accommodation Team or the Planning and Placement Team process for consideration.

The Issue of Disability and Section 504 of the Rehabilitation Act

Section 504 of the Rehabilitation Act of 1973 prohibits all programs and activities receiving federal financial assistance, including public schools, from discriminating against students with disabilities, as defined in the law. A student with a disability under Section 504 is defined as one who has a physical or mental health impairment (in this case, life-threatening food allergy) that “substantially limits a major life activity,” such as walking, seeing, hearing, speaking, breathing, learning,
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working, caring for oneself, and performing manual tasks (29 U.S.C. 794 § 504; 34 C.F.R. § 104 et seq.).

“Substantially limited” is not defined in the law or Section 504 regulations. It is the responsibility of the Section 504 team to determine eligibility criteria and placement as outlined in the regulations. In order to determine a child’s qualification, an individualized assessment of the child is required. The law provides that a team of persons knowledgeable about the child must make eligibility determinations on a case-by-case basis.

The law in the State of Connecticut requires that all schools must develop processes to identify all students with food allergies and develop and implement an individualized health care plan and emergency care plan for every student with life-threatening food allergies. Whether students with life-threatening food allergies are identified under Section 504 as disabled individuals or not, the Bethel Public Schools provides these students with individualized health care plans and emergency care plans to address their health and safety needs.

Participation in Food Service

Bethel Public Schools’ students who have a life threatening food allergy will be provided with safe and nutritious meals should their parents choose to have them participate in the school lunch program. See Appendix A: Participation in Food Service for Students with Life-Threatening Food Allergies for specific information.

Prevention and Training Measures

In order to eliminate accidental exposure to allergens for the child who has a life-threatening food allergy, prevention measures promoted by the Bethel Public Schools include:

- Effective sanitation and cleaning measures.
- Promotion of hand-washing practices following eating to prevent cross-contact using recommended procedures of soap and water or hand wipes when soap and water are not available.
- Encouragement of safe practices among students, such as discouraging meal/snack swapping, utensil swapping among students, and prohibiting eating on school transportation.
- Consideration of promoting areas where typical food allergens are avoided, such as the classroom or lunch tables, in an attempt to decrease exposure to allergen. However, allergen free areas can never be guaranteed and should not provide a false sense of security.
- Sharing information, including the contents of the IHCP and ECP of students with life-threatening food allergies to substitute staff for school nurses and teachers.
- Training of all school staff in the recognition of symptoms of anaphylaxis and emergency plans for students with known allergies.
- Sharing information and awareness of the existence and prevention of life-threatening food allergies to peers of children with such allergies.
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- Adherence to OSHA and Universal Precautions Guidelines for disposal of epinephrine auto injectors after use.

In general, training provided by the Health Services Coordinator and the school nurses includes information about the existence of life-threatening food allergies, anaphylaxis, symptoms, emergency responses, prevention measures, and safe practices. The Health Services Coordinator and the school nurses provide awareness, intervention, and prevention practices to parents, students, and staff.

All school nurses have a copy of CSDE’s *Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools*. The Coordinator of Health Services provides the nurses access to up to date and research-based practices in the management of food allergies.

Bethel Public Schools’ school nurses are trained in the management and prevention of allergic responses and anaphylaxis and its treatment; the development of individualized health care plans and emergency care plans; reasonable accommodations within regular education; the requirements of Section 504; appropriate school district policies and procedures; the process of collaborating with families; and the implications of normal development in drafting care plans. Records of training are maintained by the district’s Health Services Coordinator and the school nurses.

This plan will be reviewed and revised as necessary.

APPENDIX

A Participation in Food Service Program for Students with Life-Threatening Food Allergies
Assuring the student’s participation in the school food service program is a collaborative effort between parents, food service workers, and school nurses with support from school and district administration. To assure the student’s participation in school food service program, the following procedures are in place:

1. The school nurse notifies the Food Service Director and the Cafeteria Manager of students with life-threatening food allergies as they are identified. The school nurse shares with them all relevant information, including the information on the physician’s medical statement, to ensure that the food service workers know the requirements for accommodating the student’s special dietary needs.

2. A medical statement on the form entitled *Medical Statement for Children With Disabilities* or *Medical Statement for Children without Disabilities*, completed in its entirety, signed by a licensed physician, and containing detailed information on the child’s diet plan, including those foods the student cannot eat, as well as foods the student can eat, (e.g., foods that should be substituted,) and will be maintained in the child’s health record and shared with the Food Service Director and school food service staff. *Note: this statement must be signed by a licensed physician. The school food service program cannot make any accommodations unless this form is completed, signed, and on file.*

3. Parents can check monthly menus for the meals to be served at school either by obtaining a print copy of the month’s menu from the school, or by checking online in the following manner: From the district’s website, [www.bethel.k12.ct.us](http://www.bethel.k12.ct.us), go to “Quick Links” and click on “School Lunch Information.” At the bottom of the page, click on the link to the school lunch menus. This brings you to the Sodexho website, [www.sodexoeducation.com/usa](http://www.sodexoeducation.com/usa). Under “Public K-12 School Districts” put in the name of the State and City to locate the Bethel School Lunch Menus.

4. The school food service program makes nutrition and ingredient information available so that parents can identify items that are safe for the student to eat. The ingredients and contents of the foods and beverages used in the meals are located in a product information binder at each school. Parents and staff can review the product information and menus of meals to be served prior to the start of each month. Access to this information can be arranged through contact with the Food Service Director or the school’s Cafeteria Manager.

5. Based on menus and product information, parents should develop a list of foods and beverages that are safe for the child to eat based on the documentation in the medical statement signed by the licensed physician.

6. When unexpected substitutions are made in the food products delivered and available on any given day, the Cafeteria Manager will notify the child and a previously identified safe food choice can be chosen for the day.

7. If a student does not see a safe food or beverage choice for lunch, the student can ask the cashier/cafeteria manager to provide one.

8. Cafeteria workers and managers and the Food Service Director are all trained by the school nurse in the presence of life-threatening food allergies, prevention measures, food service accommodations, and emergency responses to a student who is experiencing an allergic reaction.