Sample Action Plan for Developing District Policy for Meal Modifications in the School Nutrition Programs

This sample is intended as a guide. Each district may require different actions, resources, or staff.

Step 1: Identify the objective and target date for completion. Complete a separate action planning form for each objective.

Objective	Target date
To develop a district policy and standard operating procedure (SOP) for providing meal modifications in the U.S. Department of Agriculture's (USDA) school nutrition programs.	September 30

Step 2: Identify the actions needed to meet the objective above. For each action, identify the materials and resources needed, the staff responsible, and the target date for completion.

Actions	Materials and resources needed	Staff responsible	Target date
1. Identify district procedures and timeline for approving policies and SOPs. Schedule time on the agenda for any required policy review and approval meetings.	District policy requirements and applicable committee meeting schedules (e.g., board of education)	Food service director, school nurse supervisor	September 30

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2. Review the federal and state requirements for meal modifications for students with and without disabilities in the school nutrition programs.	Connecticut State Department of Education (CSDE) resources • Allowable Fluid Milk Substitutes for Non-disability Reasons in the School Nutrition Programs • CSDE webpage: Special Diets in School Nutrition Programs • Guide to Meal Modifications in the School Nutrition Programs • Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools • Overview of the Requirements for Meal Modifications in the School Nutrition Program • Summary Charts of the Requirements for Meal Modifications in the School Nutrition Programs Federal and state regulations • Section 504 of the Rehabilitation Act of 1973 (Section 504) • Individuals with Disabilities Education Act (IDEA) • Americans with Disabilities Act (ADA) of 1990, including changes made by the ADA Amendments Act of 2008 • USDA nondiscrimination regulations (7 CFR 15b) • USDA regulations for the school nutrition programs (7 CFR 210.10(m) and 7 CFR 220.8(m)) • Connecticut General Statutes (C.G.S.) Section 10-212c: School District Plan for Life-threatening Food Allergies	Food service director, school nurse supervisor, special education director, pupil services director	October 30

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Actions	Materials and resources needed	Staff responsible	Target date
3. Conduct a self-assessment of the district's current practices and procedures for meal modifications in school nutrition programs.	• Self-assessment of Local Practices for Meal Modifications in the School Nutrition Programs (CSDE) • Input from various disciplines, such as food service, health services, medical advisor, registered dietitian, special education, and district administration	Food service director, school nurse supervisor, special education director, pupil services director	October 30
4. Identify existing policies and SOPs for meal modifications in school nutrition programs (federal, state, and local) through web searches and contacting other schools and organizations. If using other policy language as a template, review for consistency with federal and state requirements.	• Sample policies, SOPs, resources, and webpages (refer to the CSDE's Sample Standard Operating Procedure (SOP) for Meal Modifications in the School Nutrition Programs and section 4 of the CSDE's Guide to Meal Modifications in the School Nutrition Programs) • Federal and state requirements (refer to step 2) • Sample Standard Operating Procedure (SOP) for Meal Modifications in the School Nutrition Programs (CSDE)	Food service director, school nurse supervisor, special education director, pupil services director, support staff	November 30

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Actions	Materials and resources needed	Staff responsible	Target date
5. Identify topics for inclusion in the policy and SOPs, such as federal and state requirements; requesting meal modifications; making nutrition information available for school meals; cleaning and handwashing procedures to prevent cross-contact of possible food allergens; ensuring staff communication and collaboration regarding meal modifications for students whose disability restricts their diet; and training for staff (including substitutes) involved with planning, preparing, and serving school meals. Write draft of policy and SOPs.	• Guide to Meal Modifications in the School Nutrition Programs (CSDE) • Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools (CSDE) • Federal and state requirements (refer to step 2) • Sample policies and SOPs (refer to the CSDE's Sample Standard Operating Procedure (SOP) for Meal Modifications in the School Nutrition Programs and section 4 of the CSDE's Guide to Meal Modifications in the School Nutrition Programs)	Food service director, school nurse supervisor, support staff	January 31

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Actions	Materials and resources needed	Staff responsible	Target date
6. Get feedback on the draft policy and SOPs from other appropriate school staff. Assemble review committee and submit draft policy for review.	Review committee of representatives from various disciplines, such as food service, health services, medical advisor, registered dietitian, special education, administration, board of education policy committee, and parent/teacher organizations.	Food service director, school nurse supervisor	March 1
7. Make edits and submit draft policy and SOPs for final board of education review and approval.	District team responsible for final policy approval, e.g., policy committee, superintendent, and board of education	Food service director, school nurse supervisor, support staff	April 3
8. Convert final policy and SOPs to PDF documents for distribution and posting on district website.	• Policy document and SOPs • Access to district's computer technology staff for web posting	Food service director, district's computer technology staff	April 30

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For more information, visit the CSDE's Special Diets in School Nutrition Programs webpage or contact the school nutrition programs staff at the Connecticut State Department of Education, Bureau of Child Nutrition Programs, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.This document is available at https://portal.ct.gov/-/media/sde/nutrition/nslp/specdiet/action_policy_meal_modifications_snp.pdf.

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