ROLES AND RESPONSIBILITIES WHEN SERVING STUDENTS WITH UNIQUE MEALTIME NEEDS

This document is intended as guidance for school teams as they plan and implement mealtime supports and services for students who require them. *Mealtime supports and services* include an array of accommodations, modifications, direct and consultative services, equipment, procedures, and other required supports to ensure students can safely participate in all food-related activities at school and on fieldtrips. Local staff expertise and availability may or may not match the role delineation described here; some roles may need to be shared or filled by different professionals than outlined below. The important focus is that, given the number of details involved in successful provision of mealtime supports and services, everyone works together to meet the student’s needs. Open communication and teamwork are essential to this process.

Potential roles and responsibilities in serving students with unique mealtime needs include, but are not limited to the following. ([Ctrl+Click](#) to go to linked content for each role, or simply scroll down):

- **STUDENT**
- **PARENT**
- **STUDENT’S PHYSICIAN or MEDICAL AUTHORITY**
- **SCHOOL ADMINISTRATOR**
- **TEACHER/TEACHER ASSISTANT**
- **SCHOOL NURSE**
- **SCHOOL NUTRITION DIRECTOR, MANAGER, and STAFF**
- **EXCEPTIONAL CHILDREN PROGRAM DIRECTOR/COORDINATOR**
- **504 COORDINATOR**
- **SPEECH-LANGUAGE PATHOLOGIST**
- **OCUPATIONAL THERAPIST**
- **SCHOOL TRANSPORTATION COORDINATOR/BUS DRIVER/ BUS MONITOR**
- **OTHER SCHOOL STAFF (e.g., SCHOOL SECRETARY, SCHOOL COUNSELOR, AFTERSCHOOL STAFF, COACHES, etc.)**

This list is not exhaustive; it is intended to provide points for consideration by those involved in supporting students’ unique mealtime needs during school or school-sponsored events. A school or district mealtime supports and services team can be developed to coordinate the activities of each role group.
**STUDENT**

- Learn own health conditions that require precautions or meal/diet/food modification
- Learn the food and beverage components, type of food, and/or textures that require change or are unsafe
- Teach others at school/self-advocate regarding the food and beverage components, type of food, and/or textures that require change or are unsafe
- Question unknown foods and beverages when provided
- Avoid trading or sharing foods or beverages with others
- Wash hands before and after eating
- Learn to recognize individual symptoms of a food-related emergency
- Promptly inform an adult as soon as accidental exposure occurs or symptoms begin to appear
- Eat only foods and beverages supplied by parent or informed school nutrition service
- Avoid putting non-food items in mouth
- Develop a relationship with a member of school’s Student Support Team, school nurse, counselor, administrator, and/or another trusted adult(s) in the school to assist in identifying issues related to the management of the food-related issue at school

**PARENT**

- Inform school principal, nurse, or other member of the Student Support Team of student’s unique mealtime needs prior to the opening of school (or as soon as possible after a diagnosis is made by a physician)
- Provide school staff with written medical documentation, instructions, medications, and medical orders as directed by a physician
- Provide school staff with a current diet order from the medical provider, preferably using the appropriate school Medical Statement form
- Facilitate communication between authorized school staff, such as the school nurse, and the family/student’s community-based licensed provider related to the student’s unique mealtime needs
- Participate in the development of an Individualized Education Program (IEP), Section 504 Plan, and/or Individual Health Care Plan (IHP) with the school team
- Keep the school team informed of student’s medical condition, especially when there are changes
- Participate in team meetings or communicate with all staff members who will be in contact with the student (preferably before the opening of school) to:
  - Establish a detailed mealtime supports and services plan, which may include/be documented in an IEP, IHP, and/or Section 504 Plan
  - Participate in the establishment and ongoing review of an Emergency Action Plan (EAP), as needed
- Provide school staff with a way to reach parent at all times (cell phone, beeper, etc.).
- Provide school staff with properly labeled medications student must take during school hours and replace medications after use or upon expiration, per school policy
- Consider providing a medical alert bracelet for the student
- Provide a bag of “safe snacks” in student’s classroom so there is something student can choose from during an unplanned special event
- Provide a non-perishable lunch to keep at school, in case student forgets lunch one day or unanticipated conditions prevent student from eating the school lunch
- Collaborate with school team to plan for safe off-campus experiences for the student with unique mealtime needs
- Promptly notify the principal, teacher, or school nurse if there are concerns about the management of student’s unique mealtime needs at school
- Routinely teach the student to:
  - Recognize the first symptoms of a food-related emergency
  - Tell school staff as soon as symptoms begin to occur
  - Know where appropriate medication is kept and who has access to it
  - Carry his/her own medication when appropriate
  - Not share snacks, lunches or drinks
  - Help make others (friends, classmates) “aware” of the unique mealtime needs
  - Understand the importance of hand-washing before and after eating
  - Report teasing, bullying and threats to an adult authority immediately
  - Take as much responsibility as possible for his/her own safety
  - Recognize safe and unsafe foods and question unknown foods
  - Recognize strategies for avoiding unsafe food situations
- As the student grows older, consider teaching him/her to:
  - Communicate the seriousness of his/her unique mealtime need
  - Communicate emergency symptoms as they appear
  - Read labels
  - Carry their own medication, with proper school procedures followed
  - Administer their own medication and be able to train others in its use

**STUDENT’S PHYSICIAN or MEDICAL AUTHORITY**
- Guide and support school staff in managing food/beverage selection, preparation, and service for students with unique mealtime needs
- Complete all relevant sections of the Medical Statement
- Be as specific as possible about the nature of the student’s physical or mental impairment, its impact on the student’s diet, and major life activities that are affected
- For food allergies, indicate if the student’s condition is a food intolerance, an allergy that would affect performance and participation at school (e.g., severe rash, swelling, and discomfort), or a life-threatening allergy (e.g., anaphylactic shock)
- Refer the student/family to a registered dietitian, allergy specialist or other health professional for completion of the Medical Statement, if medical assessment does not yield sufficient data to make a determination about food substitutions, consistency modifications, or other dietary restrictions
- Provide any previous and/or existing feeding/nutrition evaluations, care plans, or other pertinent documentation housed in the student’s medical records
- Consider being available to consult with the student’s mealtime planning team as it implements the feeding/nutrition care plan
**SCHOOL ADMINISTRATOR**

- Review [NC General Statute § 115C-375.1](https://www.ncleg.gov/EnactedLegislation/Statutes/ByYear/Ga/115C/115C-3751.htm)
- Ensure unique mealtime needs are addressed through IEP, IHP, and/or Section 504 Plan, if appropriate for eligible students
- Include in the school’s Emergency Action Plan (EAP) a written plan outlining emergency procedures for managing students’ life-threatening mealtime risks:
  - Modify the plan to meet unique needs of individual students
  - Consider all possible strategies for risk reduction for students with life threatening food issues
  - Support faculty, staff and parents in implementing all aspects of the Emergency Action Plan (EAP)
- Provide training and education for faculty, staff, parents, volunteers, and others regarding:
  - The importance of education and cooperation in a “dietary aware” environment
  - Life-threatening food and eating disorders
  - The relationship between carbohydrates and diabetes management
  - Risk reduction procedures
  - Emergency Action Plans (EAP)
  - How to administer medications in an emergency
  - As needed, arrange for specialized food preparation training for school nutrition personnel in collaboration with LEA School Nutrition Director
- Provide emergency communication devices (two-way radio, intercom, walkie-talkie, cell phone) for all school activities, including transportation, that involve a student with a life-threatening mealtime/food issue
- Inform parent/guardian if any student experiences an adverse mealtime event for the first time at school
- Ensure a contingency plan is in place in case of a substitute teacher, nurse, school nutrition or other personnel
- Ensure the student is placed in a classroom where the teacher is trained and willing to administer medications, if needed
- Establish procedures for how special events such as field trips, fire drills, emergency situations, classroom parties, or other events will be handled to prevent unsafe food/eating situations
- Ensure foods brought in for special events are purchased in stores and contain complete ingredient declarations
- Conduct emergency response drills for food-related issues to ensure the efficiency/effectiveness of written plans

**TEACHER/TEACHER ASSISTANT (including substitutes)**

- Participate in the team development of IEP, IHP, EAP, and/or Section 504 Plan for students requiring mealtime supports and services
- Be an expert on the IEP, IHP, EAP, and/or Section 504 Plan for students requiring mealtime supports and services in the classroom
 Ensure the classroom has a functioning intercom, walkie-talkie, or other communication device for immediate communication with the school administrators

 Inform parents/caregivers if there is a data-based mealtime concern (e.g., documentation of student behavior/status at given frequency, duration, and time of day)

 Provide students with unique mealtime needs only unaltered food that has been prepared by the parent and/or School Nutrition personnel

 Participate in training which addresses the following areas:
  o Why specific foods are unsafe for some students
  o Steps to take to prevent life-threatening food-related occurrences
  o How to recognize symptoms of the student’s life-threatening food responses
  o Steps to manage an emergency
  o How to administer medications

 Keep the student’s Emergency Action Plan (EAP) with photograph accessible in the classroom

 Review the Emergency Action Plan before a field trip or other school-sponsored event

 Ensure volunteers, student teachers, aides, specialists and substitute teachers are informed of the student’s unique mealtime needs and necessary safeguards

 Leave information in an organized, prominent and accessible format for substitute teachers

 Educate classmates to avoid endangering, isolating, stigmatizing or harassing students with unique mealtime needs

 Be aware of how the student with unique mealtime needs is being treated; enforce school rules about bullying and threats

 Enlist help from school nurse, principal and parents in keeping the classroom food-safe

 Inform parents of any school events where food will be served

 Participate in planning for student’s re-entry to school after an adverse food occurrence

 Never question or hesitate to act if a student reports signs of an adverse food response

 Ensure a student with unique mealtime needs is accompanied by an adult at all times

A. Meal or snack time

 In the classroom, establish procedures to ensure students with unique mealtime needs eat only what is brought from home or is prepared by School Nutrition staff

 Prohibit students from sharing or trading snacks

 Teach students to ask about the safety any food before touching or tasting it

 Encourage parents/guardians to send in a supply of “safe” snacks for their student

 Have parents/guardians provide a non-perishable safe lunch in case their student forgets lunch

 Avoid cross-contamination of foods by wiping down eating surfaces with soap and water before and after eating

 Reinforce hand-washing for all students before and after eating
B. Classroom activities

- Ensure foods/beverages used for classroom activities (e.g., arts and crafts, counting, science projects, parties, holidays and celebrations, cooking, or other projects) are allowable for any students who may have unique mealtime needs
- Consider non-food treats for rewards, class parties, and special events
- Require students, staff, parents and visitors entering the classroom to wash their hands

C. Field trips

- Collaborate with administrator and/or school nurse, prior to planning a field trip to:
  - Ensure medications and instructions are taken on field trips
  - Ensure a functioning cell phone or other communication device is taken on field trip
  - Consider mealtime situations on field trips and plan for prevention for students with unique mealtime needs
  - Consider ways to wash hands before and after eating (e.g. provision of hand sanitizer, etc.)
  - Know where the closest medical facilities are located
- Invite parent of a student with unique mealtime needs to accompany the student on school field trips
- One to two people on the field trip should be trained in recognizing symptoms of life-threatening food responses, administration of medications, and emergency procedures

SCHOOL NURSE

A. Planning and supervision of daily care needs of students with UMN

- Introduce self to the student and show him/her how to get to the nurse’s office and/or how to contact the school nurse, as appropriate.
- Secure related food/diet orders and medical information from student’s health care provider and parent/guardian.
- Communicate with family, student and health care provider to obtain needed input and to develop a Nursing Care Plan (NCP), consistent with requirements of the North Carolina Board of Nursing.
- For students with non-life threatening meal related conditions, and for students with Emergency Action Plans (EAPs) who have additional health care needs, complete an assessment of student and health related needs.
- For students with life threatening meal-related conditions, complete an EAP immediately.
- Ensure the Emergency Action Plan (EAP) includes the student’s name, photograph, unique mealtime restrictions/needs, risk reduction procedures, emergency procedures, and required signatures.
- Meet with parents on a regular basis to discuss issues relating to plan implementation.
- Arrange follow-up at least semi-annually, or as often as necessary, to evaluate the Individual Healthcare Plan (IHP) and/or EAP and determine need for revision.
- Ensure access to emergency medication when developing plans for fire drills, lockdowns, etc.
- If present, in the event of an emergency, communicate with local EMS about the location of the student and type of unique mealtime need he/she has.
- Provide oversight for emergency response plans in the absence of the school nurse.

### B. Prepare staff who care for students with UMN
- For students with life threatening conditions, prior to entry into school or, for a student who is already in school, immediately after the diagnosis, meet with the student’s team (everyone who comes in contact with the student), including but not limited to: parents, principal, teachers, teacher assistants, specialists, school nutrition personnel, physical education teacher, custodian, bus driver, local EMS, etc. to share and train on the EAP.
- From the NCP complete an IHP, in non-medical terms, for use by all staff that come in contact with the student, as listed above.
- Familiarize teachers with IHPs and Section 504 Plans of their students by the opening of school, or as soon as the plans are written.
- Provide information to all staff on a need-to-know basis (including bus drivers) about student’s unique mealtime needs, symptoms, risk reduction procedures, emergency procedures, and how to administer medication.

### C. Policy and/or procedural considerations
- Refer student to Section 504 Coordinator for eligibility, or contribute to exiting Section 504 plan, as appropriate.
- Track in-service attendance of all involved parties to ensure that they have been appropriately trained.
- Implement a periodic ‘food emergency drill’ similar to a fire drill
- Post school district’s emergency protocol and have available all IHPs and EAPs in the principal’s office, or designated location.
- Post the location of emergency medications.
- Assure storage of emergency medications in a manner that provides quick access, consistent with school policy and state statute.
- Periodically check medications for expiration dates to ensure they are current.
- Determine how emergency medications will accompany the student with special dietary needs on field trips; review emergency procedures with classroom teachers prior to field trips as needed

### SCHOOL NUTRITION DIRECTOR, MANAGER, & ASSISTANT MANAGER

#### A. Participate in the school’s coordinated approach to managing unique mealtime needs.
- Participate in the development of IEP, IHP, EAP, and/or Section 504 Plan. Discuss each of these with members of the school’s multi-disciplinary team to ensure consistency in practices and expectations.
- Communicate and collaborate with parents to gather helpful information and to keep them informed of the specific actions that will be taken at school to provide appropriate meals and snacks.
• Help plan and implement procedures for addressing students’ unique mealtime needs including specific practices for managing food allergens in school meals served inside and outside of the dining area.

B. Prepare for and respond to unique mealtime needs.
• Become familiar with all completed Medical Statements and provide training for appropriate school nutrition staff on these. Keep these on file in an appropriate place.
• Identify students with unique mealtime needs at the Point of Sale (POS) with POS software or another method of identifying students, without compromising students’ privacy or confidentiality rights.
• Be familiar with students’ Emergency Care Plans (ECP) and what actions must be taken if a food allergy emergency occurs in the dining room. Make sure that school nutrition staff are able to respond to a food allergy emergency in the dining room or food service area and implement an ECP.
• If appropriate and allowed by state and local laws and regulations, keep an epinephrine auto-injector in a secure place in the dining room or kitchen. If you are delegated and trained according to state laws, be ready to use an epinephrine auto-injector.
• After each food allergy emergency, participate in a review of how it was handled with the school administrator, school nurse, parents, staff members involved in the response, EMS responders, and the student to identify ways to prevent future emergencies and improve emergency response.

C. Help with the daily management of unique mealtime needs.
• Follow the Medical Statement as written by the recognized medical authority. Contact the health care provider if more information is needed to understand and properly address the unique mealtime needs of the student.
• Make appropriate substitutions or modifications for meals served to students with unique mealtime needs.
• Identify students with food allergies in a way that does not compromise students’ privacy or confidentiality rights.
• Educate all school nutrition personnel on reading product food labels, recognizing unsafe ingredients and allergens as specified by the Medical Statement in foods, and creating food-safe and allergen aware procedures in purchasing, receiving, storing, recipe development, preparing and serving meals/snacks to students with unique mealtime needs.
• Be prepared to provide current information on nutritional content of school-prepared menu items, meals and snacks to parents, students, administrators and others. This may include carbohydrate counts, ingredients lists, and nutrient facts labels.
• Maintain contact information for manufacturers of food products and request additional information or clarification if needed on products and ingredients.
• Discuss appropriate precautions with food distributors to help them understand that all food substitutions must be approved by the school nutrition director, in writing, in advance of delivery to the school.
• Follow policies and procedures to prevent allergic reactions and cross-contact of potential food allergens during food preparation and service.
Review and follow sound food handling practices to avoid cross contamination cross-contact with unsafe foods.

- Strictly follow cleaning and sanitation protocol to avoid cross-contamination.
- Thoroughly clean and sanitize all tables, chairs and floors after each meal service to decrease risk of cross-contact.
- Thoroughly clean and sanitize tables and chairs for the “food safe” table or zone immediately before meal service to students with unique mealtime needs.
- Establish written policies and specific storage, preparation and service procedures for school nutrition personnel that are specific for students with unique mealtime needs.
- Create specific areas in the food preparation/service areas and dining area that will be designated as “food safe” areas or zones.
- Enforce proper hand washing for all school nutrition personnel, and encourage handwashing for all students before and after meals.
- Establish and monitor procedure for cleaning and sanitizing dishes and utensils that have been used in classrooms.

- Coordinate with other appropriate school staff if the purchase of specialized equipment or specific foods is required.
- Provide advance copies of the menu to parents/guardians and notification if the menu is changed.

D. Participate in professional development on unique mealtime needs and food allergies.

- Communicate the policies and practices used by the school nutrition staff to prevent food allergy reactions to parents through newsletters, announcements, and other methods.
- Provide continuing education to school nutrition staff to help recognize and understand various unique mealtime needs.
- Review specific strategies for reducing/preventing allergic reactions in the dining room.
  - Signs and symptoms of a food allergy reaction and emergency procedures.
- Help develop policies against bullying and discrimination of students with unique mealtime needs.

E. Create and maintain a healthy and safe school environment.

- Be in compliance with the unique mealtime needs of the student.
- Be able to recognize students with unique mealtime needs in the dining room.
- Follow policies and procedures to prevent cross-contact and cross-contamination of potential food allergens during food preparation and service.
- Ensure that unique mealtime needs policies and procedures are followed and address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Promote a positive psychosocial climate in the dining area and encourage supportive and positive interactions between students.
- Individualized HACCP Plans may be necessary for some unique mealtime needs and high risk populations.
- Plan ahead to have safe meals for field trips and other school events.
- Avoid the use of latex gloves by school nutrition personnel; use non-latex, single-use gloves.
EXCEPTIONAL CHILDREN PROGRAM DIRECTOR/COORDINATOR

- Maintain a cooperative relationship with other central office personnel, principals and school personnel, other related service agencies, and parents to ensure effective, coordinated, compliant programming related to mealtime supports for student with disabilities
- Ensure all relevant Exceptional Children (EC) personnel have appropriate training and resources to serve and educate students with unique mealtime needs
- Ensure EC staff coordinate IEP team meetings to discuss unique mealtime needs with appropriate IEP Team participants
- Ensure EC staff monitor student progress in response to supports and/or services developed to address unique mealtime needs
- In coordination with School Nutrition Director:
  - establish and monitor policies and procedures for provision of mealtime supports and services for students with disabilities, including:
    - identifying students with disabilities who have unique mealtime needs
    - ensuring appropriate documentation of unique mealtime need in IEPs and other required forms
    - training classroom personnel on appropriate food storage, preparation and service procedures
  - maintain records/reports/inventories related to student mealtime supports in accordance with local/state/federal policies
- Develop and maintain a mealtime planning team to provide technical assistance to schools
- Include special mealtime programming in parent engagement/education efforts, including orientation to all relevant procedures and forms
- Coordinate with other appropriate school staff if the purchase of special equipment or foods is required

504 COORDINATOR

- Maintain a cooperative relationship with other central office personnel, principals and school personnel, other related service agencies, and parents to ensure effective, coordinated, compliant programming related to mealtime supports for student with disabilities
- Provide ongoing training and support to district and school-based staff regarding Section 504 and the implementation of the Section 504 procedures
- Ensure all relevant personnel have appropriate resources to prohibit discrimination of students with unique mealtime needs
- Ensure 504 committees discuss unique mealtime needs of students with disabilities and develop/implement accommodation and intervention plans
- In coordination with School Nutrition Director:
  - establish and monitor policies and procedures for provision of mealtime supports and services for students with disabilities, including:
    - identifying students with disabilities who have unique mealtime needs
ensuring appropriate documentation of unique mealtime need in 504 plans
training classroom personnel on appropriate food storage, preparation and service procedures
  o maintain records/reports/inventories related to student mealtime supports in accordance with local/state/federal policies
Include special mealtime programming in parent engagement/education efforts, including orientation to all relevant procedures and forms
Coordinate with other appropriate school staff if the purchase of special equipment or food/beverage is required

**SPEECH-LANGUAGE PATHOLOGIST**
- Participate in and possibly coordinate the Mealtime Supports and Services Team at the school or LEA level
- Provide evaluation, consultation, intervention, training and other needed support for team members related to students’ unique mealtime needs
- Refer students who are suspected of having mealtime issues to the Mealtime Supports and Services Team
- Provides guidance on adaptive equipment, diet, food preparation, feeding techniques, and optimal positioning
- Facilitate and support family acquisition of community-based evaluations, interventions, or other services, as needed
- Communicate and consult with community-based providers on issues related to students’ unique mealtime needs
- Provide direct intervention for unique mealtime needs
- Support the Mealtime Supports and Services Team in providing quality control and risk management of the mealtime routine

**OCCUPATIONAL THERAPIST**
- Provide evaluation, consultation, intervention, training, and other needed support for team members related to student’s unique mealtime needs, especially related to:
  o Mealtime routines  
  o Mealtime environment  
  o Sensory issues related to mealtime participation  
  o Biomechanics/motor skills, seating, and positioning for mealtime participation
- Provide direct intervention to students related to unique mealtime needs
- Facilitate acquisition of needed mealtime equipment and supplies
- Participate on and/or coordinate the LEA Mealtime Supports and Services Team
- Consult with community providers to obtain diagnostic and treatment plan information about the student with unique mealtime needs
- Facilitate and support family acquisition of community evaluations and intervention

**SCHOOL TRANSPORTATION COORDINATOR/BUS DRIVER/ BUS MONITOR**
• Provide a representative from the Transportation Department for meetings to discuss student’s Emergency Action Plan (EAP), 504 Plan, IHP, or IEP should a crisis occur while the student is on the school bus
• Provide training for all school bus drivers on managing student health risks related to unique mealtime needs
• Provide bus staff with functioning emergency communication device (e.g., cell phone, two-way radio, or similar device) at all times
• Know how to communicate with Emergency Medical Services when en route
• Enforce a general policy of no food or eating allowed on the school bus, unless medically indicated
• Provide training for bus drivers and bus monitors, including substitute drivers and monitors, to adequately prepare for action in the event of a food-related emergency

OTHER SCHOOL STAFF (e.g. AFTERSCHOOL STAFF OR COACHES)
• Participate in the development of IEP, IHP, EAP, and/or Section 504 Plan as appropriate
• Conduct activities in accordance with all school policies and procedures regarding unique mealtime needs
• Store student’s EAP in a known and readily accessible place for appropriate school staff
• Make certain emergency communication device (e.g. walkie-talkie, intercom, cell phone, etc.) is always functional and available
• Ensure 1-2 people are present/nearby who have been trained and are authorized to administer emergency medication
• Clearly identify who is responsible for keeping emergency medication if it is not the student
• Maintain current emergency medication in the first aid kit
• Establish emergency medical procedures with EMS
• If for safety reasons, medical alert identification needs to be removed during specific activities, remind student to replace this identification immediately after the activity is completed