

Date: March 19, 2015

To: Authorized Representatives, Food Service Directors, and School Nurses of School Food Authorities Participating in the U.S. Department of Agriculture (USDA) Child Nutrition Programs

From: Jessica Sharkus, RDN, CD
Director-School Nutrition Team

Subject: Special dietary needs rules and carbohydrate counting for diabetic students participating in USDA Child Nutrition Programs

The Department of Public Instruction (DPI) School Nutrition Team has received an increasing number of questions regarding the role of the school food service department in the dietary management of diabetes. Many schools are relying on food service staff to assess carbohydrate counts for students participating in the National School Lunch Program, including the Afterschool Snack Program and School Breakfast Program. This memo will clarify the appropriate role of food service staff in accommodating the special dietary needs of students as it has been outlined by the USDA in the 2001 guidance “Accommodating Children with Special Dietary Needs in the School Nutrition Programs.”

Keeping any student with diabetes safe at school requires a multidisciplinary approach. The student’s health care team must work with the student and parents to help manage student’s condition; a registered dietitian or diabetic educator can be a very valuable addition to this team. At a local level, action must be taken by the school’s administrator, principal, school nurse, and the food service staff, as well as the student, parents, and teachers to ensure each student’s needs are met.

Diabetes may be diagnosed as a disability by a licensed physician. Providing special dietary accommodations for children with disabilities is required under Section 9(a) of the Richard B. Russell National School Lunch Act, 42 USC 1758(a), Child Nutrition Program regulations and in accordance with the Americans with Disabilities Act Amendments Act of 2008, P.L. 110-325. USDA regulations 7 CFR Part 15b require substitutions or modifications be made in school meals for children with disabilities that result in dietary restrictions. A child with a disability must be provided with a safe meal when that need is supported by a statement from a licensed physician identifying:

- ✓ the child's disability;
- ✓ an explanation of why the disability restricts the child's diet;
- ✓ the major life activity affected by the disability; and
- ✓ the food or foods to be omitted from the child's diet, and the food or choice of foods that must be substituted.

Additionally, schools are encouraged to accommodate students with special dietary needs who do not have a disability diagnosis when possible. This can be done usually with good communication and Offer vs. Serve (OVS). A reimbursable school lunch is required to offer

students five components, which are meat/meat alternate, grain, fruit, vegetable, and milk. However, a student is only required to select three of these components to have a reimbursable meal at a school that is implementing OVS. A reimbursable breakfast includes grains, fruit, and milk; students may be allowed to turn down some items, depending on the school's OVS option. Students with dietary restrictions unrelated to disabilities may be able to select a reimbursable meal that meets their needs with thorough communication with the food service staff.

The role of food service staff is to provide a safe meal using the diet prescription outlined by the physician using reasonable accommodations. Questions as to how this should be accomplished should be discussed with the student's physician and/or parents. USDA has reinforced on page 21 of the 2001 guidance that, "Under no circumstances should school food service staff diagnose health conditions, perform a nutritional assessment, prescribe nutritional requirements, or interpret, revise, or change a diet order."

To accommodate students with diabetes, school food service staff can and should provide menus, recipes, and product labels, as well as planned portion sizes for various menu items. The student's parents, in collaboration with the student's health care providers and school nurse, should use this information to determine which items the student can have and if portion sizes need to be adjusted to provide a safe meal for the student. In many cases, these resources provide enough information to make informed decisions on what the student can have without exact carbohydrate counts for every item, much as would be done when evaluating items made from scratch at home or ordered from a restaurant.

While falling outside of the required responsibilities, some school food service departments do use nutrient analysis software to provide a nutritional profile, including carbohydrates, of their planned menus. If relying on this analysis for carbohydrate counting, please be aware of the following considerations:

- The counts will only be as accurate as the ingredient, recipe, and portion size entered into the software. To have confidence in using the analysis to base carbohydrate counts on, the person completing the analysis should have the training and expertise needed to ensure accuracy.
- Any new or newly formulated ingredients, changes in recipes, or changes in planned portion sizes may change the original analysis.
- Carbohydrate counts will be provided for the planned menu item and in the planned portion size that have been entered into the software. If the student is allowed to select a smaller portion size of an item or self-serve a variable portion size, the count would be compromised.
- Nutrient analyses can only allow for the planned portion size and is not able to compensate for the amount actually consumed.
- Often times, the various condiments that may be offered are not included with the analysis of a specific menu item. Also, bulk condiments allow for students to determine the appropriate portion size, which could allow for a large range in carbohydrate content.
- There are times when last minute substitutions or menu changes occur, and these may not be reflected in the daily or weekly nutrient analysis provided. Also, schools may not have warning that a substitution will be required based on supply from their distributor.

- Any information provided on menus should include a disclaimer alerting parents and students that the information is an estimate that could vary with substitutions and students' selections.

Further information regarding the accommodation of the special dietary needs of students can be found on our website at http://fns.dpi.wi.gov/fns_market1, including a webcast created by DPI's school nurse consultant titled "School District's Roles and Responsibilities in Carbohydrate Counting." There are also two webcasts regarding special dietary needs of students on our training page at http://fns.dpi.wi.gov/fns_sntwebcasts#sdn.

Please feel free to contact the following School Nutrition Team members with questions or concerns regarding special dietary accommodations:

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