

Hill View Montessori Charter Public School

Meal Modification Policy for Child Nutrition Programs (NSLP and SBP)

Purpose

Hill View Montessori Charter Public School (HVMCPS) is committed to providing equitable access to nutritious meals through the National School Lunch Program (NSLP) and School Breakfast Program (SBP) under our Community Eligibility Provision (CEP), where all students receive free meals. This policy ensures compliance with federal laws (e.g., Americans with Disabilities Act Amendments Act of 2008, Section 504 of the Rehabilitation Act of 1973, Individuals with Disabilities Education Act—IDEA) and Massachusetts Department of Elementary and Secondary Education (DESE) guidance, prohibiting discrimination based on disability (a protected class under civil rights rules). We accommodate meal modifications for disabilities at no extra cost and encourage them for non-disability needs to promote inclusion, health, and participation, aligning with our Montessori values of grace, courtesy, respect, and responsibility (as in our Parent Complaint Procedure).

This policy formalizes our current process: Families note allergens/preferences on student health forms; the School Nurse reviews and communicates to the Front Desk Administrator, who coordinates with our food vendor to adjust orders (e.g., eliminating bananas school-wide for a student's severe allergy). Modifications are provided promptly to ensure safety and equity.

Scope and Definitions

- **Disability-Related Modifications:** Mandatory for physical/mental impairments substantially limiting major life activities (e.g., eating, breathing), including severe allergies (anaphylaxis or inhalation risks). These may deviate from standard meal patterns if needed for equal access.
- **Non-Disability Modifications:** Encouraged for preferences like mild allergies, religious (e.g., halal/kosher), cultural (e.g., vegetarian), or ethical reasons. These must align with USDA meal patterns for reimbursement.
- **Applies To:** All students (K-8, 306 enrollment), including those with IEPs/504 plans. No extra fees; modifications integrated into CEP free meals.

Roles and Responsibilities

- **Coordinator:** Front Desk Administrator oversees requests, vendor coordination, and tracking.
- **Team Collaboration:** Involves School Nurse, Director of Finance and Administration, and special education staff. Food vendor ensures compliant substitutions.
- **Families/Staff:** Report needs via health forms, email, or verbal contact; provide medical statements as needed.

Procedures for Requesting and Implementing Modifications

1. **Request Submission:**
 - Families/staff submit via student health forms (preferred, as in current practice), email (tpolanco@hvmcps.org), phone (978-521-2616 ext. 1019), or in-person. No formal form required initially for non-disabilities; use DESE's Medical Statement template (Attachment A in DESE memo) for disabilities outside patterns.
 - Timely Response: Acknowledge within 1-2 business days; implement immediately for safety (e.g., no delays for forms in urgent allergy cases). Annually confirm ongoing needs at enrollment or via emails (e.g., tied to August meals notifications).
2. **Evaluation:**

- **Disabilities:** Require a medical statement signed by a state-licensed healthcare professional (e.g., MD, DO, PA, NP) detailing impairment, diet impact, and substitutions (e.g., for banana allergy: "Omit all banana products due to anaphylaxis risk"). IEPs/504 plans substitute if equivalent info included—no duplicate forms. Evaluate collaboratively; deny only if unreasonable (e.g., fundamental program alteration) with written reasons and grievance rights.
 - **Non-Disabilities:** No medical statement needed; accommodate if feasible (e.g., swap pork for turkey for religious reasons). Deny if it deviates from patterns without justification.
3. **Implementation:**
- Adjust vendor orders promptly (e.g., eliminate allergens school-wide if safest). Label meals discreetly for privacy (FERPA compliance).
 - Track in a secure log: Student ID (anonymized), request date/type, medical support, actions taken, and annual reviews. Retain 3+ years for ARs.
 - Monitor: Nurse/admin review effectiveness; revise as needed (e.g., if allergy severity changes).
4. **Denials and Grievances:**
- Rare; if denied, provide written explanation, alternatives, and appeal options (via Parent Complaint Procedure: start with coordinator, escalate to Executive Director/Board Chair at hvmbotchair@hvmcps.org). Also reference USDA civil rights processes (program.intake@usda.gov) and tie to our Title IX/Staff Complaint Procedures if overlapping (e.g., sex-based disability discrimination).
 - Prohibit retaliation; ensure confidentiality.

Training and Notification

- **Staff Training:** Annual sessions for food service, nurse, admin, and teachers on policy, recognizing disabilities (broad ADA definitions), and civil rights (e.g., no discrimination in meal access).
- **Public Notification:** Post policy on website (www.hvmcps.org), in parent handbooks, and email annually (e.g., with meals info). Include in IEP workshops (flyer topics like "Accommodations and Modifications"). Multilingual versions (Spanish/Portuguese) for diverse families.
- **Recordkeeping:** Maintain logs/forms in secure files; available for DESE ARs.

Nuances, Edge Cases, and Implications

- **Nuances:** For severe allergies, school-wide eliminations are reasonable but document as disability accommodations to avoid over-accommodation claims. For non-disabilities, balance with costs (e.g., vendor limits).
- **Edge Cases:**
 - IEP/504 Overlap: Use IEP data (e.g., functional performance sections) as medical statements; coordinate with Director of Faculty and Student Services.
 - Vendor Constraints: If unavailable substitution, seek alternatives (e.g., DESE-approved lists); reimburse only compliant meals.
 - Temporary Needs: Handle short-term (e.g., post-surgery) without full forms if urgent.
 - Religious/Cultural: Encourage but not mandatory; ties to civil rights (national origin/religion protections).
- **Implications:** Enhances safety (reduces allergy incidents), equity, and compliance (avoids AR findings/withheld funds). Positively impacts participation (higher meal uptake under CEP) and aligns with Montessori holistic education. Legal: Reduces liability (e.g., ADA suits); consult DESE for small-school flexibilities (e.g., streamlined logs).

For questions, contact the Coordinator or DESE (nutrition@doe.mass.edu). Review annually or with regulatory changes.