

BOARD OF EDUCATION
FAIRFIELD PUBLIC SCHOOLS
FAIRFIELD, CT

Policy Committee Meeting

Monday, June 24, 2014
Education Center
501 Kings Highway East
Superintendent's Conference Room
5:00 p.m.

Agenda

- I. Call to Order
- II. Approval of June 2, 2014, Minutes
- III. Policy
 - Policy #5516 Students – Management of Food Allergies in Schools; review of Shipman Goodwin sample policy
- IV. Open Discussion/Public Comment
- V. Adjournment
- VI. Future Items:
 - Policy #5225 Students – Requirements for Graduation
 - Policy #4240 Personnel – Electronic Mail
 - Policy #4110 Personnel – Recruitment and Selection
 - Policy #5542 Students – On Campus Recruitment
 - Policy #6511 Instruction – Special Education
 - New policy request for Monthly Financial Reporting to BOE

Future Mtg. Dates and Times: **Monday, August 25**; *TUESDAY, September 2 (Monday is Labor Day)*; *Monday, September 15*; *Monday, October 13*; *Monday, November 17*; *Monday, December 1, 2014*.

All meetings will be held at 501 Kings Highway East, Superintendent's Conference Room unless otherwise noted.

BOARD OF EDUCATION
FAIRFIELD PUBLIC SCHOOLS
FAIRFIELD, CT
Policy Committee Meeting
Monday, June 2, 2014
Education Center
501 Kings Highway East
Superintendent's Conference Room
4:15 p.m.

Minutes

- I. Call to Order – The meeting was called to order at 4:39 p.m. In attendance were Jennifer Kennelly, Chairperson, Donna Karnal and John Convertito. Karen Parks was also in attendance representing the administration and several parents were also in attendance.
- II. Approval of May 12, 2014, Minutes – 3:0:0
- III. Several committee members discussed conflicts with the date of the next meeting. As a result the committee voted to change the next meeting from June 16 to Tuesday, June 24 at 5:00 in the Superintendent's Conference Room. Vote: 3:0:0
- IV. Policy
 - Policy #5516 Students – Management of Food Allergies in Schools; review of Shipman Goodwin sample policy continued from March 31 discussion

Several recommendations to the language of the sample policy were made, and several sections were added from the Chicago Policy. The committee members requested that Karen research with legal counsel whether or not 504 eligibility must occur with all students identified with life threatening food allergies. She agreed to either research or ask legal counsel to attend the next meeting.
- V. Open Discussion/Public Comment – Several parents stated that FPS should advertise that all students with life threatening food allergies should have a 504 plan because it is now considered a disability. There was some disagreement from Mr. Convertito and Mrs. Parks which resulted in a request to get a legal opinion.
- VI. Adjournment – Meeting adjourned at 6:37 p.m.
- VII. Future Items

Future Mtg. Dates and Times: **Tuesday, June 24 at 5:00**; *Monday, August 25; TUESDAY, September 2 (Monday is Labor Day); Monday, September 15; Monday, October 13; Monday, November 17; Monday, December 1, 2014.*

A version of this policy developed by Shipman and Goodwin update to reflect new legislation.

Students

Students with Special Health Care Needs

5516

Food Allergy Management Plan and Guidelines

The Fairfield 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 glycogen storage disease and to ensure prompt and effective medical response should a child suffer 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(ies), or glycogen storage disease as developmentally appropriate. To this end, the Fairfield Public Schools adopt the following guidelines related to the management of life threatening food allergies for students enrolled in district schools.

I. Identifying Students with Life-Threatening Food Allergies

- A. Early identification of students with life-threatening food allergies is **vital to the effective implementation of this policy**. The district therefore **requests** parents/guardians of children with life-threatening food allergy(ies) to **promptly** notify the school **in writing** of the allergy(ies), providing as much information about the extent and nature of the food allergy(ies) as is known.
- B. When a parent/guardian reports that their child has diagnosed food allergy(ies) or other life threatening allergy(ies), the school shall request the parent/guardian to provide the following:
 1. Written authorization to obtain detailed medical information **in writing** on the child's condition from the physician;
 2. Written consent to administer or self-administer medications during the school day, as applicable in accordance with in the **District's** Administration of Medication Policy;
 3. An Emergency **Care** Plan and Treatment Authorization ("**Emergency Care Plan**") completed and signed by their child's licensed health care provider and signed by the parent;
 4. Any medications necessary to prevent or treat allergic reactions along with relevant prescription and dosage information, **and to** replace medications after use or expiration;
 5. A **written** description of the student's past allergic reactions, including triggers and warning signs;
 6. Current emergency contact information and prompt notice of any updates;
 7. A description of the student's emotional response to the condition and the need for intervention; and
 8. Recommendations on age-appropriate ways to include the student in planning or care.

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

I. Identifying Students with Life-Threatening Food Allergies (continued)

- C. **Suspected Allergies:** In the event the School Nurse or other principal designated personnel suspect that a student has a food allergy or other life threatening allergy(ies) the school shall provide the parent/guardian written notification and request for the student to be evaluated.
- D. **Non-Cooperation:** If the parent/guardian of a student with known or suspected food allergy(ies) or other life threatening allergy(ies) fails or refuses to cooperate with the school for an evaluation or implementation of an appropriate Individualized Health Care Plan (IHCP) and Emergency Care Plan (ECP), the school shall implement an Emergency Care Plan stating to call 911 immediately upon recognition of symptoms and administer medication in compliance with District Policy, along with sending written notification to the parent/guardian of the student's ECP.

II. Individualized Health Care Plans and Emergency Care Plans

- A. If the District is notified pursuant to Section I of this policy that child has life-threatening food allergy(ies), the district shall develop an individualized health care plan (IHCP) for the child. Each IHCP shall contain information relevant to the child's participation in school activities, and should attempt to strike a balance between individual, school and community needs, while fostering normal development of the child.
- B. The IHCP shall be developed by the parents/guardians and appropriate school personnel. Such personnel may include, but are not limited to, the school nurse, school or food service administrator(s); classroom teacher(s); and the student, if appropriate. The school may also consult with the school's medical advisor, as needed.

In addition to the IHCP, the district shall also develop an Emergency Care Plan (ECP) for each child identified as having a life threatening food allergy. The ECP is part of the IHCP and describes the specific directions about what to do in a medical emergency. The ECP should include the following information at a minimum:

- a. The child's name and other identifying information, such as date of birth, grade and photo;
- b. The child's specific allergy(ies);
- c. The child's signs and symptoms of an allergic reaction;
- d. The medication, if any, or other treatment to be administered in the event of exposure;
- e. The location and storage of the medication;

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

II. Individualized Health Care Plans and Emergency Care Plans (continued)

- f. Who will administer the medication (including self-administration options, as appropriate);
 - g. Other emergency procedures, such as calling 911, contacting the school nurse, and/or calling the parents or physician;
 - h. Recommendations for what to do if the child continues to experience symptoms after the administration of medication; and
 - i. Emergency contact information for the parents/family and medical provider.
- C. IHCPs are 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. Information to be contained in an IHCP should include a description of the functional health issues (diagnoses); student objectives for promoting self care and age appropriate independence; and the responsibilities of parents, school nurse and other school personnel. The IHCP may also include strategies to minimize the student's risk for exposure, such as considerations regarding:
- a. classroom environment, including allergy free considerations;
 - b. cafeteria safety;
 - c. participation in school nutrition programs;
 - d. snacks, birthdays and other celebrations;
 - e. alternatives to food rewards or incentives;
 - f. hand-washing;
 - g. location of emergency medication;
 - h. risk management during lunch and recess times;
 - i. special events;
 - j. field trips;
 - k. extracurricular activities;
 - l. school transportation;
 - m. staff notification; and
 - n. transitions to new classrooms, grades and/or buildings.
- D. The IHCP shall be updated annually, or upon newly diagnosed allergies or new medical response instructions for known allergens.

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

II. Individualized Health Care Plans and Emergency Care Plans (continued)

- E. An individualized health care plan and glycogen storage disease action plan shall also be developed for any student with glycogen storage disease. Such plan shall include, but is not limited to, the provision of food or dietary supplements by the school nurse or by an employee approved by the school nurse to a student with glycogen storage disease. Such plan may not prohibit a parent/guardian or a person they so designate, for providing food or dietary supplements to the affected student on school grounds during the school day, **nor shall it prevent the parent/guardian from requesting a 504 plan for the student.**
- F. **The IHCP and ECP shall be disseminated to all school staff who supervise the student during the school day and at school sponsored activities or are responsible for the provision of food to the student. Plan distribution includes, but not limited to, the student's teachers, classroom assistants, food service staff, coaches, transportation staff, school health professionals, school case managers, custodial staff, student aides and the parents/guardians of the student.**

II. Training/Education

- 1. All school personnel will be educated on how to recognize symptoms of allergic reactions, **preventive strategies to minimize a child's risk of exposure to life-threatening allergens**, and what to do in the event of an emergency. Staff training and education will be coordinated by **the principal and school nurse**. Any such training regarding the administration of medication shall be done **in** accordance with **District Policy and State Law**.
- 2. The District shall **also** provide appropriate education and training for **all** school personnel regarding the management of students with life threatening food allergies and glycogen storage disease. Such training shall include, as appropriate for each school (and depending on the specific needs of the individual students at the school) training in the administration of medication with cartridge injectors.
- 3. ~~Each school within the district~~ **The District** shall provide **each school with** age-appropriate information to students about food allergies, how to recognize symptoms of an allergic reaction and the importance of adhering to the school's policies regarding food and/snacks.

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

IV. Prevention

~~Each school will develop appropriate practices to minimize the risk of exposure to life threatening allergens. Practices which may be considered may include, but are not limited to:~~

- ~~1. Encouraging hand washing;~~
- ~~2. Discouraging students from swapping food at lunch or other snack/meal times;~~
- ~~3. Encouraging the use of non food items as incentives, rewards or in connection with celebrations.~~

- A. **SCHOOL-WIDE EVALUATION:** Each school shall annually identify common food allergens that require school-wide management and risk reduction. Each school shall report school-wide allergy information to the principal, school nurse, and food service director.
- B. **MULTI-DISCIPLINARY TEAM:** The principal or principal designee shall assemble a multi-disciplinary team to undertake school-wide allergen risk prevention and the management of the individual health needs of the students with food allergies or other life threatening allergies. The multi-disciplinary team may include teachers, classroom assistants, food service staff, coaches, transportation staff, school health professionals, school case managers or social workers, custodial staff, student aides and the parent(s)/guardian(s) of the student with a food allergy. The team shall utilize best practices outlined in the CPS Food Allergy Guidelines to identify measures that will promote the prevention of exposure to allergens, promote a familiarity with the signs and symptoms of an allergic reaction and a familiarity with the emergency response plan for each student with a life threatening allergy, including but not limited to emergency medications.
- C. **SCHOOL-WIDE EXPOSURE PREVENTION MEASURES:** The multi-disciplinary team shall identify schools areas, events, programs, activities, student travel, art projects, parties, and holiday celebrations, student rewards, hidden food ingredients, substitute teacher situations, etc., where there is a high or higher risk of exposure to allergens and develop a plan and procedures to reduce these risks. Plans to reduce instances of allergen exposure may include issuing parent notices that certain food items are restricted from a classroom or the school building. The principal shall ensure that protocols to prevent exposure do not result in the exclusion of students from school activities solely based on their food allergies. The principal shall ensure that protocols and measures are updated during the school year to reflect newly enrolled students with food allergies or new food allergy diagnoses or medical response for current students.

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

IV. Prevention (continued)

- D. **FOOD SERVICES:** The principal shall consult with the Office of Special Education and Supports and the Department of Nutrition Support Services to determine what school-wide food service accommodations, if any, are recommended.
- E. **SCHOOL EMERGENCY RESPONSE PLAN:** Beginning with the 2011-2012 school year, the principal shall ensure that the school's annual School Emergency Management Plan includes provisions for students with food allergies including a response plan for incidents involving mass allergen exposure. The School Emergency Management Plan shall incorporate provisions to annually practice food/allergy emergency protocols and procedures as part of the school-wide drill program.

V. Communication

1. As described above, the school nurse shall be responsible for coordinating the communication between parents, a student's individual health care provider and the school regarding a student's life threatening allergic condition. School staff responsible for implementing a student's IHCP will be notified of their responsibilities and provided with appropriate information as to how to minimize risk of exposure and how to respond in the event of an emergency.
2. The school administrative staff and school nurse shall communicate annually to all school personnel the availability of training regarding the management of students with life-threatening food allergies and glycogen storage disease.
3. Each school will ensure that there are appropriate communication systems available within each school (i.e. telephones, cell phones, walkie-talkies) and for off-site activities (i.e. field trips) to ensure that school personnel are able to effectively respond in case of emergency.
4. The District shall develop standard letters to be sent home to parents, whenever appropriate, to alert them to food restrictions within their child's classroom or school.
5. All district staff are expected to follow district policy and/or federal and state law regarding the confidentiality of student information, including medical information about the student.

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

VI. Monitoring the District's Plan and Procedures

The District should conduct periodic assessments of its Food Allergy Management Plan and Procedures. Such assessments should occur at least annually and after each emergency event involving the administration of medication to determine the effectiveness of the process, why the incident occurred, what worked and what did not work.

Legal Reference: Connecticut General Statutes
CSDE Guidelines for Managing Life-Threatening Food Allergies in CT Schools
10-15b Access of parent or guardian to student's records.
10-154a Professional communications between teacher or nurse and student.
10-207 Duties of medical advisors.
10-212a Administrations of medications in schools
10-212c Life threatening food allergies; Guidelines; district plans
10-212a(d) Administration of medications in schools by a paraprofessional.
10-212c Life threatening food allergies; Guidelines; district plans, as amended by P.A. 12-198)
10-220i Transportation of students carrying cartridge injectors
19a-900 Use of cartridge injectors by staff members of before or after school programs, day camp or day care facility.
52-557b Good Samaritan Law. Immunity from liability for emergency medical assistance, first aid or medication by injection
The Regulations of Connecticut State Agencies section 10-212a through 10-212a-7, Administration of Medication by School Personnel.
Guidelines for Managing Life-Threatening Food Allergies in Connecticut Schools, Connecticut State Department of Education (2006)
Federal Legislation
Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794 § 504; 34 C.F.R. § 104 et seq.)

Students

Students with Special Health Care Needs

Food Allergy Management Plan and Guidelines

5516

Legal Reference (continued)

Americans with Disabilities Act (ADA) of 1990 (42 U.S.C. §12101 et seq.; 29C.F.R. §1630 et seq.

The Family Education Rights and Privacy Act of 1974 (FERPA)

Land v. Baptist Medical Center, 164F3d423 (8th Cir. 1999)

The Individuals with Disabilities Education Act of 1976 (IDEA) (20 U.S.C. § 1400 et seq.); 34 C.F.R. § 300 et seq.

FCS Instruction783-2, Revision 2, Meal substitution for medical or other special dietary reasons.

P.A. 09-155 An Act Concerning the Use of Asthmatic Inhalers and Epinephrine Auto-Injectors While at School.

Changes made at 3/31/2014 meeting (red)

Policy adopted: cps 8/09, rev 5/12