



# Food Allergy & Medical Conditions Protocol

## Mission

Chartwells is committed to providing a safe and nurturing environment for students during meal times. We understand the importance of providing accurate nutrition, ingredient, and allergen information for students to make informed choices for their health and well-being and we are dedicated to creating a foodservice environment that ensures information accuracy at all times. Furthermore, we understand the impact that food allergies and medical conditions can have on the life of young people and we commit to strict observance of USDA regulations for accommodating children with special needs. We will also collaborate with school personnel, parents and caregivers, and medical providers to provide a safe food environment.



## Goal of the Protocol

The goal of the Chartwells Protocol is to provide instruction and expectations to our foodservice teams in order to fulfill our commitment to providing accurate nutrition, ingredient, and allergen information to all customers, and to successfully accommodate children with special dietary needs.



## Part I: Annual Requirements for All Districts

The following activities must be completed on an annual basis in all school districts operated by Chartwells K12, including school districts and individual schools where a student dietary need has not been identified.

### // Chartwells Director of Dining Services Training

Directors of Dining Services (DDS) must stay current with their food allergy and medical conditions training modules. Annual training includes a series of four online modules, plus one additional optional module, with a certificate of completion kept on file for three years. Directors must also complete annual online training for specific medical conditions present in their district.

### // Foodservice Associate Training

All associates working in a school meal program must be trained on information accuracy and the principles and techniques necessary to accommodate students with allergies and food-related medical conditions. Training will be led by the DDS on-site with a training sign-in sheet kept on file for three years.

### // Food Label Collection

Food labels containing nutrition, ingredient, and allergen information must be compiled for the start of the school year for all products served to students, and must be stored in the food service office **and** in each school for parent review. As per Chartwells' policy, allergen information is managed exclusively by the label, not verbal or written letters/statements from manufacturers. Chartwells' employees should not contact manufacturers to inquire about any allergen information.

### // Review School District Allergy Policy

The DDS must identify the district policies and procedures in place for managing students requesting diet modifications and clarify which, if any, non-disability requests will be accommodated. The district must also notify families of the process for requesting meal modifications and the individual responsible for coordinating modifications. All school district policies and procedures will be strictly enforced. If the district policy contradicts the Chartwells protocol it is important to contact your regional dietitian.

### Chartwells Nut Policy

Do not serve any product containing peanuts, tree nuts, or coconut or products that contain advisory statements on the label

You may serve peanut butter except in peanut free schools. It is vital that you follow strict food safety practices to avoid cross contact if you serve peanut butter.



# Annual Director of Dining Services Training Module Topics

- Module 1 // Fundamentals
- Module 2 // Laws & Regulations
- Module 3 // Safe Meals for All Students
- Module 4 // Modified Menus
- Module 5 // Menu Modifications for Students with Food Allergies *(optional)*

## Part II: Safe Meals for All Students

Directors are expected to adhere to the following procedures to ensure that accurate information is provided to all students, families, and school nursing personnel. The steps are intended to create an accurate Webtrition menu consistent with the account's order guide and planned purchasing. This process is followed at the start of each school year and when menus are implemented.

### 1 // Menu Development and Product Selection

The Director of Dining Services:

- a. Uses the Chartwells Model Menus and Approved Product List (APL) to plan menus.
- b. Works with Regional Chef to ensure the products on the menu are on order guide and available for purchase.
- c. Ensures recipes in the menu reflect the local bakery products to be purchased, and USDA Foods.
- d. If ingredients or recipes necessary for the district's menu implementation do not exist in Webtrition, both are requested and approved through the Chartwells Request Portal, before they are served to students.

Attention: When planning menus, remember the Chartwells Nut Policy.

- Do not serve any product containing peanuts, tree nuts, or coconut or products that contain advisory statements on the label
- You may serve peanut butter except in peanut free schools. It is vital that you follow strict food safety practices to avoid cross contact if you serve peanut butter.

### 2 // Ordering

The Director of Dining Services:

- a. Creates and maintains a shopping list in MyOrders, to reflect the specific products on the menu and to ensure the correct products are consistently ordered.

## Part II: Safe Meals for All Students



### 2 // Ordering (Continued)

#### Managing Product Changes During Ordering

Product substitutions can cause severe issues for students with allergies, insulin dependence, or for those who are avoiding certain types of foods. The best course of action is to avoid accepting unplanned substitutions whenever possible.

- a. **Permanent Product Changes:** If a product is intentionally and permanently changed on the order guide, the director is notified by the Broadline Distributor in advance. The director takes the steps to transition to the new product in Webtrition.
- b. **Temporary Substitutions:** The account may be notified during the ordering process that a product will be substituted. If this occurs, the director should:
  - i. Consider rearranging the menu for a short time, and update the order with a product that is currently in-stock at the distributor and used on the menu elsewhere.
  - ii. The director needs to be signed up for alerts from MyOrders. Alerts can be received via text or email and will provide order status updates, including if any product shortages are anticipated. This will allow the director to plan a course of action prior to product delivery.
  - iii. If the product is needed and cannot be replaced, accept the substitution and follow the procedures in the “Receiving Products” section to manage the product once it is delivered on-site.
  - iv. Utilize the [Purchasing Playbook](#) as a resource for purchasing questions or issues that may arise. The playbook includes information on MyOrders, including shopping lists, alerts, and how to submit a Buysmart case to request products or report issues, such as product substitutions.

### 3 // Receiving Products

#### The Associate Receiving Grocery (Broadline) Deliveries:

- a. Reviews the deliveries for cross-contact. If something is damaged or contaminated, it must be rejected.
- b. Reviews the delivery invoice for unexpected substitutions. Substituted products will be clearly marked on the invoice.

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## Part II: Safe Meals for All Students



### 3 // Receiving Products (Continued)

- c. Notifies the kitchen manager of any products that were rejected or substituted by the distributor. If the kitchen manager cannot immediately review the substituted product, the product must be secured to ensure it does not end up in food production prior to inspection.

#### The Kitchen Manager:

Determines if the unexpected substitutes are acceptable or must be rejected, based on menu, food quality, and allergy concerns.

- i. The manager must review the ingredients of the substituted product for the 8 major allergens and any allergens and medical conditions represented in the school. Use the label binder kept on-site to determine if the substituted product has different allergens than the product ordered. If a new allergen is present in the substituted product, the product must be set aside, not used, and returned to the distributor for credit (rejected).
  - ii. If a product contains another ingredient that represents harm to a child with a medical condition (such as fruit in syrup for a diabetic child) that product must also be rejected.
  - iii. Substituted products without ingredient labels must be rejected.
- a. Initials next to each substituted item on the invoice after reviewing these decisions.
  - b. For products that were rejected, determines what recipes/product(s) will be used to replace the item on the menu and communicates this to the onsite team.

#### The Director of Dining Services or Designee:

- a. Assists the onsite team with questions regarding whether to accept a substitution and how to replace rejected products on the menu.

### 4 // Storage

#### The Foodservice Team Onsite:

- a. Stores all products in their original packaging. If the original packaging does not fit in the storage area, it must be kept in the kitchen for 24 hours.
- b. Stores products to avoid cross contact.

## Part II: Safe Meals for All Students

### Allergen & Ingredient Inquiries

If a student, parent, or school faculty member asks an associate about a specific allergen in a food on the menu or sold a la carte, the question needs to be directed to the café manager. No other associate should ever answer questions about the presence of allergens in food. The manager can refer to product labels that are required to be kept on-site to answer any questions about specific ingredients or allergens.

### 5 // Preparation and Service

The Foodservice Team Onsite:

- a. Ensures recipes are followed at all times and proper food handling procedures are followed to prevent cross-contact.

### 6 // Follow Up and Maintenance

The Director of Dining Services:

- a. Maintains Webtrition menus, recipe Favorites list, and MyOrders shopping list to accurately reflect what is actually being purchased in the district.
- b. Makes corrections to recipes used in Webtrition menus collections and/or purchasing as a result of the annual Webtrition Accuracy Audits performed by the Chartwells Dietitian.
- c. Visits schools regularly to ensure the ordering, receiving, storage, and service procedures are being followed correctly.
- d. Consult with school principals and nursing to ensure that student food allergies are being managed to their satisfaction.

## Part III: Modified Menus

In addition to the instructions above, Directors of Dining Service must follow these additional procedures to successfully make meal accommodations for students with allergies or medical conditions.

### 1 // Receive Request

The Director of Dining Services:

- a. Ensures that all of the necessary information is included in the written request and is signed by the student's physician or medical provider depending upon the condition and disability status. Once the school café manager has been notified of the allergy, has spoken with the parents or student to make an assessment of how the modified menu will be handled, and reviewed the medical statement or discussed with the nurse, the student can begin to participate in the school meals and retail program.
- b. If the accommodations required by the student are minor and easily understood by the Director of Dining Services, the kitchen manager, under his/her direction can begin to make modifications immediately for the student immediately. The final plans should be implemented within 5 school days.

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## Part III: Modified Menus

### 1 // Receive Request (Continued)

- c. If the original request from the physician or medical provider cannot be shared with foodservice according to district policy, a separate request from the nursing staff must provide a signed document which includes all of the required information as well as an indication that there is a request on file from the ordering medical provider.

The Director of Dining Services (Continued):

- b. Follows the internal communication protocol within the foodservice department.
- c. Determines whether the request constitutes a disability or a non-disability.
- d. May elect to other milk substitutes such as soymilk or lactose-free milk for students without disabilities with a statement from a parent/legal guardian or from a medical authority identifying the student's need.
- e. If the request is not a disability and will not be accommodated according to district policy, communicate this to the requestor according to the district policy.

### 2 // Gather Information

The Director of Dining Services:

- a. Talks with the parent/caregiver or student about likes and dislikes, how often the student will participate in the school meals program, and which specific meals.
- b. Explains that the student should not participate in the meal program until the final menu has been approved and a start date has been agreed upon, recognizing that accommodations should be made as soon as possible.

### 3 // Modify Menu

The Director of Dining Services:

- a. Where the food allergy is one of the eight most common food allergies or is a medical condition, the director completes the online training module(s) for the specific allergy or condition.
- b. The most common and complex allergies and conditions for which online modules have been developed include: diabetes; peanut and tree nut allergy; egg allergy; Celiac disease and gluten free; wheat allergy; milk allergy; soy allergy; fish and shellfish allergy; and PKU and inborn errors of metabolism.



What is a Disability?

All public school districts are required to provide meal accommodations to students with disabilities. Disabilities are defined in Section 504 of the Rehabilitation Act and in the Americans with Disabilities Act. Both laws define a disability as a physical or mental impairment that substantially limits a major life activity, such as eating, breathing, or the operation of major bodily functions such as the respiratory or gastrointestinal system.

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## Part III: Modified Menus



### POS Procedure

In districts where Chartwells is responsible for the entry of diet restrictions into the POS, no one but the director should enter any allergy or medical condition information into the point of sale system for a particular student. Information should be entered only for students where foodservice has the appropriate written documentation of an allergy or medical condition. The information in the point of sale system should match the information in the written documentation from the medical provider.

### 3 // Modify Menu (Continued)

#### The Director of Dining Services (Continued)

- c. Modifies the existing menus to omit the foods of concern using the following steps:
  - i. Uses the Webtrition allergen screening tools to initially identify foods currently in the account that may contain the allergens of concern. However, THIS INITIAL SCREENING CANNOT BE THE SOLE REFERENCE FOR MENU DEVELOPMENT.
  - ii. After screening the menu, inspects package labels of the menu and recipe items that are currently purchased and utilized in the district. This will determine if each individual food product or ingredient is free from the offending allergen(s) or meets other requirements for menu modification for medical conditions such as carbohydrate count.
  - iii. Once this initial inspection is complete the menu can be developed or approved by the director, however, label inspection must be completed on a daily basis at the school before any food is prepared for students with food allergies or medical conditions.
- d. The modified menu is sent to the parent/caregiver, either by the Director or the school nurse. The nurse and parent/caregiver should be given the opportunity to personally inspect food labels before the menu is approved.
- e. The menu includes the name of the student, parent/caregiver name and signature, date of approval, and who received the approval, such as the Director or school nurse.
- f. Date of implementation is agreed upon.
- g. The Director of Dining Services enters menu restrictions in to the Point of Sale (POS) system. NOTE: If the entry of diet restrictions into the POS is not managed by Chartwells, the director must follow district procedures.

## Part III: Modified Menus



### 4 // Prepare Menu

The Director of Dining Services

- a. Designates an appropriate associate (either school manager or assigned associate) to manage the student's menu.
- b. If the allergy or condition is on the list requiring further training at the school level, the Director trains the associate utilizing the Chartwells Online Modules.
- c. Reviews the modified menu and implementation procedures with the associate.

The Assigned On-Site Associate(s):

- a. Trains other on-site staff on the menu implementation procedures.
- b. Ensures products for the modified menu are stored to prevent cross-contact.
- c. Reviews labels on all foods used in preparing the daily menu to ensure the allergens are not present and that foods are safe for the student.
- d. Follows the recipes specified in the modified menu.
- e. Follows preparation and cleaning procedures to prevent cross-contact.
- f. Keeps the meal covered and away from other foods to prevent cross-contact, and labels the meal if needed to ensure it is served to the correct student.

#### Role of the Cashier

The cashier is the last line of defense to ensure every student's meal is safe. They are responsible for identifying students with food allergies through information in the point of sale system but are not responsible for eliminating all allergens from the student's tray unless the allergen is very obvious such as a peanut butter sandwich for peanut allergic students or a milk carton for a milk allergic student. The cashier will only verify that the student is receiving their customized modified meal, but the meal should already have been reviewed by the assigned foodservice associate in the school to confirm it is safe for the student.

### 5 // Serve Menu

The Foodservice Team Onsite:

- a. Ensures the modified meal is served to the correct student.
- b. If applicable, utilize the POS system to confirm the student is receiving the meal assigned to them. NOTE: The student's meal should already have been reviewed by the assigned associate in the school to confirm it is safe for the student.

## Part III: Modified Menus

### 6 // Record Keeping

The following is kept on-site at the school and in the central foodservice office:

- a. Any specific procedures for how kitchen associates should respond to requests from students, parents, or nurses and who to contact in case of a question or emergency.
- b. A copy of the sign-in sheet from the annual associate training
- c. All food labels for products being used in menus
- d. The following on file for EACH student with a diet modification:
  - a. Medical Statement or Diet Request
  - b. Modified Menu with date approved and date implemented
  - c. Allergen-specific module training certificate(s) for both Director and on-site kitchen staff

### 7 // Follow Up & Maintenance

The Chartwells Director or designee must visit the site regularly to ensure the established procedures are being followed by the kitchen staff and school personnel. The Director may also choose to notify the school personnel or parent/caregiver of on-site visits as a time to also follow up on menu implementation and update the student's file if needed.

