

### How to Create a 504 Plan for Your Child w/ Celiac

# WHAT IS A 504 PLAN?

A 504 plan is a blueprint for how schools will provide supports and remove barriers for a student with a disability. Its purpose is to give equal access to the general education curriculum.

It stems from the Rehabilitation Act of 1973 (Section 504 of the Rehabilitation Act) which applies to all institutions receiving federal financial assistance, such as public schools.

Under this law, public schools *must* provide a free, appropriate public education and not discriminate against disabled students.

This law acknowledges that the disability may not require special education services, but a plan is needed to ensure the student receives an appropriate education accommodating the disability within the classroom. This law must accommodate a special diet, including the gluten-free diet for children with celiac disease.

Note: 504 plans are PERSONALIZED. There are no set rules for what a 504 plan should look like or what it should include. The only things schools have to put in writing are their policies on 504 plans.

# WHY SHOULD YOU CREATE A 504 PLAN?

It's a personal decision whether or not to create a 504 plan, but here are some reasons why:

- It may help educate teachers and school administrators understand the potential complications (physical and mental) someone with celiac may face after ingesting even the tiniest bit of gluten. Without a 504 plan, any verbal conversation you have with teachers and school administration does not legally need to be honored.
- It's a great educational tool for yourself and your child. The plan needs to be reviewed each year, so it's a good way to stay on top of "best practices for celiac disease".
- It may better prepare your child for the teenage years, and make her/him less likely to stray from a strict gluten free diet in order to "fit in".
- You can help support others by 1) bringing more attention to celiac disease, and 2) sharing your plan with others, and helping them facilitate the process.

# **HOW TO GET STARTED CREATING A 504 PLAN**

1. Identify the 504 Plan Coordinator & request a 504 plan meeting with your school administration. (Check the school website or call the school administration office and ask). **Ask if a specific form needs to be completed or if they simply need a letter from your child's physician.** 

# 2. Ask your child's physician for a letter, or to complete a form if needed. Information that might be included:

- a. The diagnosis and date of disability (e.g., celiac disease)
- b. Explanation of why the disability restricts the child's diet or activity
- c. The major life activities affected (e.g., eating, toileting, learning)
- d. The child's developmental/educational level in terms of managing his/her celiac disease (i.e. ability to read food labels, ability to wash hands before eating, ability to recognize what non-food items may contain gluten, etc
- 3. Discuss the plan with your child before the meeting. Depending on their age, ask them what challenges, if any, they are having at school, and what they would like to include in the plan.
- 4. Meet with the 504 coordinator to develop the plan. (Note: You can decide whether or not you want your child to attend the meeting) The coordinator will typically decide who else should be involved in developing the plan, including teachers, district dietitian, school food service staff, etc.

# WHAT TO INCLUDE IN A 504 PLAN

As mentioned earlier, all 504 plans are personalized-there are no set requirements of what to include. That being said, here are some elements other parents have included in their child's 504 plan.

Start with an objective of the plan, explaining what celiac disease, potential complications, and what physical, academic, and social hurdles children with celiac disease can face.

#### Other elements that might be included:

- Teachers/Staff will provide at least 48 hours' notice provided for in-school or school-sponsored activities that the student is registered for in which gluten containing food or other items (i.e. art supplies) will be used.
- Parents will notify school of student's participation in school-sponsored activities which may reasonably be expected to involve food. And, the school will provide a gluten-free snack for the child which has been pre-approved by the parent
- Student must not ingest gluten and must avoid touching food containing gluten.
- Encouragement of proper hand washing to avoid incidental ingestion of gluten (e.g. from surrounding students' snacks). *Note:* Hand sanitizer is not sufficient for the purposes of potentially removing gluten.
- Food items or items containing gluten (e.g. Play Dough) not to be used as a classroom learning tool non-gluten substitutions can be made for classroom and parent can provide input/assistance.
- The teacher/school will provide information to the parent about any gluten free food or no-food item they are giving to the child, including: manufacturer, flavor, ingredient list, container size, etc, so the parent can decide if safe to consume/use.
- In instances where food items are provided by the school, the same snacks are provided to all children whenever possible. If not possible, gluten free option(s) available. Collaboration with parent welcome. Parent is notified of all food that is provided to the student.
- Gluten-free lunch options are made available to child.
   Collaboration between parent and food services professionals will take place.
- For all snacks provided by parents, parent will provide gluten free snacks for student.

- The teacher will provide each substitute teacher a list of child's accommodations.
- Student will be permitted to go to the bathroom as necessary.
- Parents will provide an extra set of clothes in the health office.
- Student should be allowed to rest in nurse's office as necessary.
- Student will be included on allergy/medical conditions notification list given to school and transportation staff.
- Student will have access to counselor and/or health officer when feeling an uncomfortable level of anxiety.
- Student will communicate to teacher that they have been "glutened" & request 50% extended time on a test, homework, or class assignment.
- Counselor will give student preferential class selection to avoid classes where accidental gluten exposure could occur regularly.

Be sure to note all persons responsible (i.e. teacher, parent, student, nurse, nutrition services, other staff) for each accommodation.

# **HOW TO MONITOR YOUR CHILD'S 504 PLAN**

- Keep a written list of contacts for everyone who is involved in the plan.
- Periodically review the plan with your child so he/she understands what's in the plan. Encourage them to let you know if the plan isn't being followed. Role play w/ your child how to address teacher/staff to ensure needs are being met.
- Establish a good relationship with your child's teacher & staff administrators. Find out what type of communication they prefer (i.e. email v. phone call) If you have any concerns the plan isn't being followed, reach out as soon as possible.
- Schedule an annual 504 plan meeting to review the plan and update it as needed.

# WHAT TO DO IF THE 504 PLAN ISN'T BEING FOLLOWED

- 1. Ask for a meeting w/ the teacher (or whomever isn't following the plan). Share any concerns you have based on what you're seeing at home. Ask for an honest opinion about what the teacher thinks is and isn't working in the 504 plan. Be very specific about why plan needs to be followed, & ask what help you can provide as a parent.
- 2. Talk to principal and/or assistant principal. See above. Agree on a timetable for needed supports, and put it in writing.
- 3. Talk to school 504 coordinator. Does plan need to be revised? If so, agree on a timetable, contact all parties involved, and get it in writing.
- 4. Talk to school district 504 Compliance Officer (i.e. see link below for SDUHSD Section 504 Compliance Officer) if plan is still not being followed after all steps above.
- 5. Contact TASK for assistance. (link in resources)
- 6. Contact California's Office of Civil Rights in writing, if steps above have been undertaken, and the 504 Plan still isn't being followed.

Note: Save ALL email correspondence and cc yourself.

#### **BEYOND HIGH SCHOOL**

Section 504 still protects college age students from discrimination. They won't necessarily have a "504 Plan", but they can still receive accommodations. The process is very different, and varies from college

to college. Check the website and contact Disability Support Services for each school your child in considering attending.

In addition, you will want to contact dining services at each college and ask about gluten free diet options on campus.

# **REFERENCES & RESOURCES**

- Gluten Free San Diego Resource Page
- Navigating the Gluten Free School Years at Beyond Celiac
- Back to School & 504 Plan Guide at Celiac Disease Foundation
- Sample 504 Plan developed by the American Celiac Disease Alliance
- Accommodating Children w/ Disabilities in the School Meal Programs
   USDA Guide
- Blog conversation w/ parents around 504 plan for celiac: at Gluten Dude
- <u>Food Allergies/Special Dietary Needs</u> San Diego Unified School District Policy:
- Special Meal Accommodations Poway Unified School District:
- <u>Section 504 Information & Appeals Process</u> San Dieguito Union High School District
- TASK Help and support in California for people & their families w/ disabilities.