

Peace Lutheran School Non-Dairy Milk Substitution Policy

1) Purpose and Scope

This policy establishes Peace Lutheran School's process and responsibilities for considering and, when required, providing **non-dairy milk substitutions** during reimbursable school meals under the NSLP. The policy applies to all Peace Lutheran students participating in school meals. It reflects federal requirements and Wisconsin Department of Public Instruction (DPI) guidance. [ecfr.gov], [dpi.wi.gov]

2) Policy Summary (What Peace Will and Will Not Do)

- **Required accommodations (disability):** Peace **will provide** a milk substitute (including a non-dairy beverage) when a **documented disability** affects the student's diet. A parent or legal guardian may provide a written request for a fluid milk substitute at school lunch, for **disability reasons**.

Documentation must:

- Be signed by a parent/guardian or licensed medical professional,
 - Clearly state the disability and how the disability restricts the diet.
- **Discretionary (non-disability/special dietary needs):** Peace **will not** offer non-dairy milk substitutions for personal/parental preference, cultural/religious preference, or other non-disability reasons. USDA allows schools to provide such substitutes at their discretion; Peace opts **not** to provide them for reasons such as but not limited to:
 - Parent or student preference
 - Taste preference
 - Lifestyle choices
 - Vegan or vegetarian choice
 - Cultural or personal beliefs

Note: This policy does **not** restrict Peace from offering allowable **dairy** milk options (e.g., low-fat/fat-free, lactose-free) to all students as part of normal menu planning; those options are governed by USDA fluid milk rules. [usda.gov]

3) Definitions

- **Disability:** A disability is a physical or mental impairment that substantially limits one or more major life activities, including but not limited to eating or digestion. Under the ADA Amendments Act, most such impairments qualify; meal modifications must be provided as needed for equal program access.
- **Non-dairy milk substitute:** A plant-based beverage (e.g., soy, pea, oat) used **in place of** cow's milk when specified for a student with a disability. (For schools that choose to

offer non-disability substitutions, USDA requires specific nutrient equivalency; Peace is **not** opting to offer those.)

4) How to Request a Disability-Related Milk Substitution

1. **Submit Documentation:** Parent/guardian provides the school office with a complete statement identifying the disability, the restriction.
2. **Processing Time:** Peace will begin providing the specified substitution **as promptly as practicable** after receiving sufficient documentation; if clarification is needed, Peace will implement the **clear portions** while promptly seeking additional information.
3. **Annual Review/Updates:** Parents/guardians are required to update the medical statement annually or when needs change. Peace may request updated documentation to ensure student safety and program compliance.

5) Type of Milk Substitute Provided for Disability Accommodations

- Peace will not provide a specific type of non-dairy substitute unless a specific beverage (dairy or non-dairy) **is prescribed** by a medical provider. (If prescribed, disability accommodations **do not have to meet** USDA's non-disability nutrient-equivalency standards.)
- If the statement specifies a **non-dairy** beverage (e.g., soy, pea), Peace will procure and serve that beverage consistent with food safety, labeling, and age-appropriateness requirements.

6) Roles and Responsibilities

- **Parents/Guardians**
 - Obtain/submit required documentation; notify the school of changes in the student's condition or provider instructions.
- **Food Service Manager**
 - Review documentation; coordinate procurement; train cafeteria staff; ensure the correct milk substitute is provided; maintain records for Administrative Review.
- **Teachers and Meal Service Staff**
 - Follow the documented accommodation; verify the correct beverage is served to the correct student; report issues immediately.
- **Administration**
 - Ensure policy implementation, staff training, maintenance of procedural safeguards and grievance process consistent with Section 504/ADA and USDA civil rights requirements.