

CELIAC AT SCHOOL

A 504 Plan is the only legally enforceable way to ensure gluten-free accommodations at school.

Children spend a large amount of their time at school, and many students eat at least one meal – sometimes two – provided by the school. In addition to food, gluten is found in many everyday supplies used in learning environments. Inadvertent or accidental ingestion of gluten affects the ability of a student with celiac disease to learn and seriously endangers their health, both immediately and in the long term. Additionally, some children with celiac disease face health challenges related to celiac disease and its management that affect their social and emotional development.

CELIAC DISEASE AS A DISABILITY

Section 504(a) of the Rehabilitation Act of 1973 prohibits discrimination in all institutions receiving federal financial assistance (including schools) on the basis of disability, including certain diseases like celiac disease. This requires any educational institution receiving federal funding to provide educational programming that is "designed to meet the student's individual educational needs as well as the needs of non-disabled students are met." (7 CFR 15b.22)

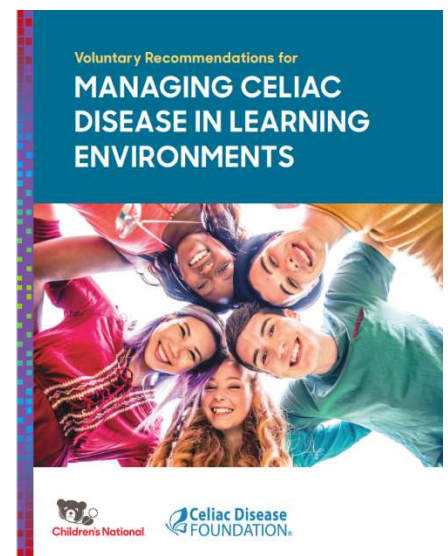
In short, the law requires reasonable accommodation to any student covered under Section 504 that appropriately meets the needs of the student without drastically altering the structure of the educational institution.

504 PLAN SERVICES AT CHILDREN'S NATIONAL

In 2020, The Celiac Disease Program at Children's National Hospital, in conjunction with the Celiac Disease Foundation, published the *Voluntary Recommendations for Managing Celiac Disease in Learning Environments* guide. It is intended to support the implementation of a Celiac Disease Management Plan for the creation and maintenance of an environment that reduces the risk of gluten exposure for children with celiac disease. The recommendations in the guide are based upon what is medically necessary for a child with celiac disease to succeed in a learning environment. You can download a copy of this guide for free at: <https://childrensnational.org/departments/ceeliac-disease-program/resources-for-families/gluten-free-at-school>.

The Celiac Disease Program at Children's National Hospital provides support for creating and implementing a 504 at school free of charge to patients who come through our Multi-Disciplinary Clinic.

Celiac disease qualifies for federal protections under the Americans with Disabilities Act.



HOW TO IMPLEMENT A 504 PLAN

- 1) Obtain a diagnosis letter. If you have not received one yet, please e-mail us at celiac@childrensnational.org
- 2) Choose your accommodations. If you would like our help in crafting a 504 Plan, please e-mail us at celiac@childrensnational.org so we can send you a survey to fill out. Alternatively, you can reference the 2020 Voluntary Recommendations for Managing Celiac Disease in Learning Environments.
- 3) Call the school. You need to request a "504 Plan Eligibility Meeting." They are required to grant this meeting in a "reasonable" time frame. The law is unfortunately silent on what "reasonable" is defined by, but we believe 60 days should be the maximum. Ensure that if you call the school, you also submit a formal, written request with the date on it.
- 4) Attend the meeting(s). The 504 Plan process has two meetings: an Eligibility Meeting and an Accommodations Meeting. Most schools combine the two meetings, but some keep them separate.
- 5) Check in annually. Most schools hold an annual 504 Plan check-in to "renew" your child's 504 Plan. Because celiac disease cannot be cured, it is considered a lifelong disease, and therefore a 504 Plan should never be rescinded.
- 6) If a school pushes back, contact us at celiac@childrensnational.org to learn more about advocacy services.

Eligibility Meeting	Accommodations Meeting
<ul style="list-style-type: none"> • Parents and the school meet to determine if the student is eligible for 504 Plans. • Often, teachers will discuss the student's performance at school as well as any difficulties he or she has had as a result of undiagnosed celiac disease. However, 504 Plans should <i>never</i> be refused as a result of a student performing well in school. • As parents, you can briefly discuss what celiac disease is and how the only treatment is a gluten-free diet. You can also discuss the student's symptoms and road to diagnosis. • With celiac disease, eating is the major life activity that is affected, and digestion and immune function are the major bodily functions that are affected. • A 504 Plan should never be denied for celiac disease. However, celiac can instead be added on to an existing IEP if the student already has one for another condition (see below table) 	<ul style="list-style-type: none"> • Parents and the school meet to discuss which accommodations the student would like to receive. • Keep a list handy of the accommodations you'd like your child to receive. • The school will note the accommodations in their system and should send you a version to check over before it's signed.

504 Plan	Individualized Education Program (IEP)	Individualized Health Plan (IHP)
<ul style="list-style-type: none"> • Legally enforceable • Accommodations in academic <i>and</i> non-academic areas 	<ul style="list-style-type: none"> • Legally enforceable • Accommodations in academic areas • Celiac can be added to existing IEP & include non-academic accommodations 	<ul style="list-style-type: none"> • NOT legally enforceable • Cleans up the mess instead of preventing the mess • Does not involve accommodations

Please note that an IEP for celiac disease should only be used if the child already has an existing IEP for another diagnosis (like ADHD). If the child does not have an IEP, you should use a 504 Plan. We never recommend an IHP for celiac disease.