

**HEAD START/EARLY HEAD START  
NUTRITION POLICIES**

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**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject: Assessment of Nutritional Needs**  
**Program: Head Start/Early Head Start**

**Section: Nutrition**  
**Date Revised: February 22, 2021**

**Policy Council Approval: March 24, 2021**

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**Regulation Reference:** 45 CFR Part(s): 1302.42 (b)(4), 1302.81(a)  
1302.61(a)(b)(c)(1)(i-v), 1302.47(7)(vi)  
1302.80 (c), 1302.44(a)(1)

**Policy:**

All children enrolled in Head Start (HS) and Early Head Start (EHS) programs will have a nutrition assessment completed to identify family eating patterns, cultural preferences, and to identify those at nutritional risk. Pregnant women enrolled in Early Head Start will be provided with nutrition information for a healthy pregnancy, and referrals for nutrition counseling will be made to the Nutrition Specialist.

**Procedure:**

1. In order to identify current feeding practices, cultural preferences, and those children at risk for nutrition problems, a nutritional assessment will be completed as follows:
  - For all HS children and EHS children over one year of age, a “Child Nutrition History” form (HS.47) will be completed at application or upon enrollment and updated annually and/or as needed. A digital or hard copy of the HS.47 may be completed.
  - For all EHS children, under one year of age, an “Infant Nutrition History” form (EHS.03) will be completed at application or upon enrollment and updated regularly. A digital or hard copy of the EHS.03 may be completed.

Nutrition concerns will be referred on the “Interoffice Referral for Services” form (HS.79) to the Nutrition Specialist.

2. Heights and weights will be completed according to “Height and Weight Screening Policy”. If Body Mass Index (BMI) for children two years and older is at or above the 95<sup>th</sup> percentile or below the 5<sup>th</sup> percentile, the child will be referred to the Nutrition Specialist. Children under two will be assessed on an individual basis.
3. Children will be screened for anemia according to the “Hemoglobin/Hematocrit Screening” policy. The Nutrition Specialist will assist the health staff in monitoring results and providing information to parents.
4. Children will be screened for elevated lead according to the “Lead Screening, Referral and Follow-up” policy. The Nutrition Specialist will assist the health staff in monitoring results and providing information to parents.

## **Assessment of Nutritional Needs**

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5. HS/EHS staff members will refer children with nutrition related disabilities to the Nutrition Specialist for review. (See the policy, "Referral of Nutritional Problems")
6. HS/EHS staff members will refer children with food allergies or special diets to the Nutrition Specialist for review. (See the policy, "Special Diets and Food Allergies")
7. All children will be assessed by the Nutrition Specialist and appropriate follow-up will be provided.
8. Nutrition Specialists will coordinate with the appropriate staff to ensure that special needs children are accommodated during meal service and eat meals and snacks with their classmates.
9. The "Pregnant Woman Health and Nutrition Assessment" form (EHS.20) will be completed by the EHS nurse. Information will be provided on nutrition during pregnancy, infant feeding, and the benefits of breastfeeding. As appropriate, referrals will be made to the applicable specialists; including but not limited to nutrition counseling, oral health care, and mental health services.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject:** Child and Adult Care Food Program (CACFP)      **Section:** Nutrition  
Accountability  
**Program:** Head Start/Early Head Start      **Date Revised:** February 22, 2021  
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**Regulation Reference:** 45 CFR Part(s): 1302.44(a)(2)(iii)(iv)(b)

**Policy:**

Head Start/Early Head Start will comply with the Child and Adult Care Food Program (CACFP) guidelines for program accountability at the Cleveland and Nelson Street Centers. These centers will provide meals and snacks through a contracted public school food service department.

**Procedure:**

**Meal Service, Recordkeeping and Other Operational Requirements**

The Head Start/Early Head Start program will ensure that the following areas will be adhered to and closely monitored for program compliance.

1. All meals provided by the participating centers will meet USDA/TDA required meal patterns.
  - The Nutrition Specialists are responsible for menu planning and monitoring meal production records. For children one year of age and older, the kitchen manager of the site is responsible for meal preparation and completing Form 1530, Daily Meal Production Record. The infant classroom staff is responsible for completing Form 1530A, Daily Meal Production Record for Infants. Only TDA approved forms will be used. The USDA Food Buying Guide, standardized recipes, and Child Nutrition (CN) labels are used to ensure servings meet meal pattern requirements. The meal production records are reviewed by the Nutrition Specialists for accuracy and for use of TDA approved forms.
  - For non-congregate meals, see “Non-Congregate Meal Service” policy.
2. Civil Rights requirements will be met.
  - The Nutrition Specialists are responsible for ensuring that Civil Rights training requirements are met and that appropriate documentation is in place. All staff involved in meal counts, food service, or other key areas attend annual training. New employees attend training at new employee orientation prior to assuming any duties affiliated with the CACFP.
  - Notices from the Child and Adult Care Food Program are posted at each childcare center. Federal contact addresses are posted for discrimination complaints.
3. Complete and accurate recordkeeping are kept for enrollment, attendance, participant eligibility, meal counts, meal production and monthly claims.
  - The Nutrition Specialists are responsible for training designated employees in enrollment, attendance, eligibility, meal count requirements, completing the meal production record, meal patterns, and meal service requirements.
  - Daily meal counts are completed at time of meal service by classroom staff.
  - An Administrative Assistant enters the attendance and meal service data into a computerized program which produces daily, weekly, and monthly attendance counts, meal counts and participant eligibility counts.

## **CACFP Accountability**

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- Attendance, meal counts, and participant eligibility counts are verified for accuracy and completeness by the Nutrition Specialists and Coordinator of Fiscal Program.
- Counts are verified by the Nutrition Specialists and Coordinator of Fiscal Program prior to submitting the monthly claim for reimbursement so that only claims for eligible meals are submitted. Claims will be submitted online and no later than the 25<sup>th</sup> of the month for the preceding month.
- The Nutrition Specialists verify the meal production records for completeness and accuracy.

### **Training**

The Nutrition Specialists and Coordinator of Fiscal Program provide training to program staff based upon staff members' current responsibilities prior to staff assuming CACFP duties. Training is provided annually or as needed to all staff who perform CACFP duties according to the following training plan.

1. Nutrition Specialists will provide training to new program staff that performs key CACFP activities **prior** to beginning these key activities. The areas and subtopics to be covered will be based on current CACFP training guidelines.
2. Nutrition Specialists will provide training annually to program staff that performs key CACFP activities. The topics to be included in the training will be based on current CACFP training guidelines.
3. All new employees are trained at new employee orientation in the appropriate area before assuming any duties related to the CACFP.
4. Nutrition Specialists and Coordinator of Fiscal Program update their knowledge of CACFP guidelines through policy alerts or TDA training if available.
5. Nutrition Specialists will include the appropriate registration form(s) in their training materials to ensure that all registrants have all the required documented elements. The Head Start/Early Head Start Administrative Assistant will monitor CACFP training session registration and documentation to ensure that all the required elements in the training documentation are met.

### **Monitoring Schedule/Plan**

The Nutrition Specialists are responsible for monitoring reviews for the Child and Adult Care Food Program (CACFP) according to the following guidelines:

1. Form 1606, Monitor Review, is the tool used to review all participating centers to ensure compliance with the CACFP requirements.
2. Each center is monitored a minimum of three times per year according to CACFP guidelines.
3. All meal service types being claimed (breakfast, lunch, and snack) must be reviewed.
4. Two of the reviews conducted must be unannounced; the third review may be announced or unannounced at the Nutrition Specialist's discretion.

## **CACFP Accountability**

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5. An additional review is conducted each year using Form 1529, Food Service Management Company/Vendor Monitor Review. This review may be done in conjunction with the on-site monitoring reviews.
6. Findings and recommendations are reviewed with kitchen supervisor, Childcare Licensing Specialist, Coordinator of Fiscal Program, and Early Childhood Principal. These findings and recommendations are either corrected immediately on site or a corrective action plan is established. A copy is sent to the contracted public school foodservice director and a copy is kept on file by the Nutrition Specialists.
7. All documentation of reviews is kept on file for a minimum of three years from the last day of the program year to which they pertain.

### **Financial Monitoring at Program Level**

1. The Region 16 Education Service Center uses a computerized accounting system which is monitored to ensure that expenditures are not greater than the amount appropriated.
2. The Administrative Assistant in Business Services sends a copy of the food service management company invoice to the Director of Direct Services upon receipt. The Administrative Assistant for Direct Services notifies Business Services that the invoice can be paid.
3. The Coordinator of Fiscal Program monitors monthly the invoices from the food service management company and the reimbursements from CACFP and compares them to ensure fiscal integrity and accountability.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject:** Food Safety and Sanitation  
**Program:** Head Start/Early Head Start

**Section:** Nutrition  
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**Regulation Reference:** 45 CFR Part(s): 1302.47(a)(b)(1)(2)(3)(4)(6)(ii)(7)(vi)  
1302.44(a)(2)(iv-v)(viii)(ix)

**Policy:**

Evidence of compliance with Federal, State, Tribal, and local food safety and sanitation laws related to the storage, preparation, and service of food.

**Procedure:**

1. The food service inspection form will be posted at each Head Start/Early Head Start site, and food handler's cards will be available for review.
2. All sites will comply with the Texas Food Establishment laws and rules.
3. The Texas Department of State Health Services or the local health department will inspect local schools and childcare centers on a regular basis.
4. Parents have the right to breast feed or provide breast milk to their child. A private place will be provided upon request.
5. Early Head Start staff members at facilities serving infants and toddlers will follow current food safety guidelines regarding the handling of breast milk, formula, and commercially prepared baby food. Parents should not bring pre-made bottles of formula for their infant.
6. Early Head Start staff members at facilities serving infants will ensure sterilization of dishes and utensils used during meals and snacks.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject:** Meal Service  
**Program:** Head Start/Early Head Start

**Section:** Nutrition  
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**Regulation Reference:** 45 CFR Part(s): 1302.44(a)(1)(2)(b), 1302.31(e)(2)

**Policy:**

Nutrition services will contribute to the development and socialization of children enrolled in Head Start and Early Head Start programs.

**Procedure:**

1. A variety of foods will be served that broaden a child's food experience.
  - New foods will be introduced along with familiar foods to enhance acceptability.
  - Discussion of new or unusual foods before, during, or after meals will be encouraged.
  - Discussion will include color, texture, cultural aspects, etc.
  - Children will be encouraged but not forced to try new foods.
2. All children in morning center-based settings, who have not received breakfast upon arrival will be offered a nourishing breakfast.
3. Food or physical activity will not be used as a reward or punishment.
4. Sufficient time will be allowed for each child to eat. In general, ½ hour is allowed for meals but may be adjusted if necessary.
5. Designated classroom staff, or volunteers, will eat together family style and share the same menu to the extent possible. Some locations will pass the food around the table as each person serves himself or herself while other locations will have the food served on an individual tray to each child. The focus of the family style dining experience will be on pleasant conversation or simple nutrition education activities to ensure the experience is relaxed, social, and educational.
6. Infants will be held while feeding and not laid down to sleep with a bottle.
7. The Nutrition Specialist must be consulted regarding any medically based diets, food allergies, or special diet requests. These requests will be reviewed and accommodated on an individual basis according to the "Special Diets and Food Allergies" and the "Care of Students with Diagnosed Food Allergies at Risk for Anaphylaxis" policy.
8. All Head Start and Early Head Start centers will follow the requirements for the Food and Nutrition Programs administered by the USDA/Texas Department of Agriculture.



**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject:** Non-Congregate Meal Service                      **Section:** Nutrition  
**Program:** Head Start/Early Head Start                      **Date Revised:** February 22, 2021

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**Regulation Reference:**      45 CFR Part(s):                      1302.44(a)(2)(i-iv)(b)

**Policy:**

In the event of a crisis that requires a classroom or center to be temporarily closed, or a child to be quarantined, enrolled and eligible children may be served a meal using a non-congregate delivery option. Children who receive meals from their Head Start/Early Head Start center may not also receive the same meal from a school site.

**Procedure:**

1. The Family Services Assistant (FSA) or teacher/classroom staff will contact the family of the enrolled child and offer the non-congregate meals. Parents/guardians must be informed that they may not receive duplicate meals for their child(ren). Texas Department of Agriculture (TDA) poster, which explains the prohibition of duplicate meals, will be posted at the center.
2. If the family chooses to accept the non-congregate meals, the parents/guardians may come to the center at the designated time to receive the meals. Meals may be picked up for enrolled child(ren) without the child(ren) being present. Parents/guardians must provide appropriate identification. Up to two meals and one snack will be provided per child per day. Parents/guardians of infants will be allowed to receive up to one week of meals for their infant.
3. Parents/guardians will sign for the meals on the “Non-Congregate Meal Form”. Head Start Staff will note the time the meal was received and initial.
4. Meals pattern requirements will adhere to the current USDA guidelines.
5. Non-Congregate meals will be entered and verified according to the “Child and Adult Care Food Program (CACFP) Accountability” policy.
6. Any waivers required by the USDA/TDA for non-congregate meals will be submitted.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject: Nutrition Education for Children**  
**Program: Head Start/Early Head Start**

**Section: Nutrition**  
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**Regulation Reference:** 45 CFR Part(s): 1302.31(b)(1)(i-iv)(e)(2)(4), 1302.32(a)(1)  
1302.35(d)(e)

**Policy:**

As developmentally appropriate, opportunity is provided for the involvement of children in food-related activities.

**Procedure:**

1. Developmentally appropriate nutrition activities/experiences for children will be offered in the classroom or by virtual format. These may include any of the following:
  - Physical activity as it relates to the lesson plan.
  - Participation in activities that convey how food relates to good health.
  - Discussion of the daily menu and any unusual or different foods offered.
  - Comparison and contrasting of the taste, texture, shape, size, and color of the foods served.
  - Discussion of similarities and differences in preparation of cultural foods (e.g., bread and tortillas).
  - Participation in food preparation or tasting experiences that are age appropriate.
  - Participation in the different aspects of meal service according to developmental readiness. (e.g., preparing food, setting the table, cleaning up after meals)
2. The Nutrition Specialists will correspond with the Education Specialist to make available appropriate nutrition education curricula for classroom teachers. In developing the nutrition education curricula, the specialists will use a variety of resources.
3. Nutrition activities will be documented on the HS/EHS lesson plans for classrooms and home-based programs.
4. Home-based children will be offered similar opportunities at home visits and Group Socialization Activities (GSA's).
5. Parents will be encouraged to participate in the classroom nutrition education activities with the children.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject: Nutrition Education for Parents/Staff**  
**Program: Head Start/Early Head Start**

**Section: Nutrition**  
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**Regulation Reference:** 45 CFR Part(s): 1302.46(a)(b)(1)(ii)

**Policy:**

Head Start and Early Head Start staff will collaborate with parents to promote children's health and well-being by providing nutrition education that is understandable to individuals, including those with low health literacy.

**Procedure:**

1. Nutrition education will be offered annually to parents, including how to select and prepare nutritious foods that meet the family's nutrition and food budget needs.
2. Healthy food choices will be offered at parent functions, including Group Socialization Activities (GSA). Meals or snacks for GSAs must be approved by the appropriate Nutrition Specialist prior to the activity. Infant formula and baby food will be available as needed.
3. General nutrition information will be offered to all parents.
4. Parents will be given the opportunity to consult with the Nutrition Specialist to address individual nutrition concerns, including the importance of healthy eating, beverage choices, and selecting and preparing nutritious foods to meet the nutrition and budget needs of the family.
5. Parents will be invited to participate in the planning of nutrition activities through the Health Advisory Committee, Policy Council, home visits and GSA meetings.
6. Parents will be involved in evaluating nutritional services, including but not limited to, the annual self-assessment (Assessment for Continuous Excellence) and parent surveys.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject:** Nutrition Services  
**Program:** Head Start/Early Head Start

**Section:** Nutrition  
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**Regulation Reference:** 45 CFR Part(s): 1302.40(a)(b), 1302.42(b)(4)  
1302.44(a)(1)(2)(b), 1302.47(b)(7)(vi)  
1302.35(e)(2)(3)

**Policy:**

Head Start and Early Head Start will design and implement nutrition services that are culturally and developmentally appropriate to meet the nutritional needs and feeding requirements of each child, including those with special dietary needs and children with disabilities. Parents and appropriate community agencies will be involved in planning, implementing, and evaluating the agencies' nutritional services.

**Procedure:**

1. Head Start and Early Head Start schools and centers will utilize funds from the USDA Food and Nutrition Services Child Nutrition Programs as the primary source of reimbursement for meals and snacks. Costs not allowed through USDA programs will be funded through Head Start or Early Head Start. Meals and snacks will be individualized as necessary to accommodate children with special needs and those with special dietary requirements.
2. All children in a part-day program will receive at least 1/3 of the child's daily nutritional needs and all children in a full-day program will receive 1/2 to 2/3 of the child's daily nutritional needs. Meal patterns will follow USDA guidelines.
3. Children enrolled in the morning program who have not received breakfast, will receive a nourishing breakfast when they arrive at Head Start or Early Head Start.
4. Infants and toddlers will be fed per their individual developmental readiness and feeding skills. The following guidelines will be followed:
  - USDA meal pattern for infants/toddlers per age.
  - Breast milk or formula and solid foods will be served per CACFP guidelines.
  - Children between the ages of one and two receive whole milk.
  - Foods that are a choking hazard will not be served (nuts, hot dogs, popcorn, etc.).
  - Information concerning feeding will be shared with parents and updated regularly.
  - Infants and young toddlers will be fed on demand to the extent possible.
5. Meals and snacks for children 3-5 years of age will conform to USDA requirements.
6. Foods served for group experiences at center-based settings will be high in nutrients and low in fat, sugar, and salt. The Nutrition Specialist will be available for consultation as needed to fulfill the following guidelines:
  - Children over the age of 2 years will receive 1% milk.
  - Additional sugar, fat, butter, and salt will not be placed on tables during meal or snack time.
  - 100% fruit or vegetable juice will be served rather than fruit drinks.
  - Alternatives to items high in sugar, fat, and salt will be offered.

## **Nutrition Services**

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7. Meal and snack periods will be appropriately scheduled and adjusted as necessary.
  - Children with disabilities or special needs will be accommodated during meal and snack times to participate with classmates.
  - Any concerns related to eating patterns will be referred to the Nutrition Specialist.
8. The Head Start and Early Head Start home-based programs will provide appropriate snacks and meals to each child during group socialization activities. The Nutrition Specialist will be available for consultation by staff or parents.
9. Menus for meals and snacks will be posted at each facility and will be accessible to parents. Copies will be available for parents upon request.
10. Safe drinking water will be made available to children during the program day.

### **Cleveland and Nelson Centers**

Head Start and Early Head Start centers will follow best practice policies by not allowing outside food to be brought into or removed from the centers, including birthdays and holidays.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject: Referral of Nutritional Concerns**  
**Program: Head Start/Early Head Start**

**Section: Nutrition**  
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**Regulation Reference:** 45 CFR Part(s): 1302.40(a), 1302.42(b)(4)(d)  
1302.47(b)(7)(vi), 1302.44(a)

**Policy:**

Infants and children at nutritional risk will be referred for follow-up services.

**Procedure:**

1. Children will be screened utilizing a variety of assessments, including but not limited to height/weight, lead/hemoglobin, physician documentation, and the “Child Nutrition History” form (HS.47) for children one year of age and older or the “Infant Nutrition History” form (EHS.03) for children birth through 11 months of age. The following problems require a written referral by any Head Start/Early Head Start staff member to the Nutrition Specialist:
  - Special diets
  - Food allergies
  - Disabilities that affect nutritional status
  - Children two years and older with a BMI at or above the 95<sup>th</sup> percentile or below the 5<sup>th</sup> percentile
  - Inadequate or excessive breast milk or formula intake
  - Inappropriate foods introduced for child’s age
  - Dietary problems (i.e., eating substances other than food, and/or parent requests)
2. The Nutrition Specialist will assess the child and determine intervention. The intervention may include, but is not limited to, any or all the following:
  - Providing an informational packet to parent/caregiver regarding the nutrition concern
  - Counseling with parent/caregiver regarding nutrition concern
  - Making a home visit, virtual visit, or phone call to the family to aid with nutrition issues
  - Discussing the nutrition problem with appropriate HS/EHS staff members
  - Referring to another HS/EHS specialist
  - Referring to a primary care provider for further evaluation
  - Requesting a staffing to address multiple concerns
  - Coordinating with Early Childhood Intervention (ECI) as appropriate
  - Coordinating with Student Support Team (SST)
3. Information regarding referrals will be documented on the “Interoffice Referral for Services” form (HS.79). The Nutrition Specialist will be given the white and yellow copies.
4. Once the referral has been completed, the white copy of the “Interoffice Referral for Services” form (HS.79) will be given to the center LVN, or Family Services Assistant to be filed in the child’s folder/notebook.

**REGION 16 EDUCATION SERVICE CENTER**  
**Head Start/Early Head Start**

**Subject: Special Diets and Food Allergies**  
**Program: Head Start/Early Head Start**

**Section: Nutrition**  
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**Regulation Reference:** 45 CFR Part(s): 1302.42(b)(4), 1302.44(a)(1),  
1302.47(b)(7)(vi)

**Policy:**

Special diets and food allergies will be documented and referred for follow up services.

**Procedure:**

1. Food allergies and special diets will be referred to the Nutrition Specialist by a health staff or Head Start/Early Head Start staff member.
2. Children with food allergies **MUST** have a written care plan signed by the medical provider, according to center and/or district policy. The Nutrition Specialist will provide a copy of the care plan to the Health Specialist RN.
3. Special diets and food intolerances must have appropriate documentation on file. Substitutions will be made on a case-by-case basis.
4. Family Services Assistants or health staff will place the documentation in the child's folder.
5. Cafeteria, classroom, and health staff will be notified of restrictions.
6. The Nutrition Specialist will provide the classroom staff and kitchen staff with appropriate documentation of the food allergy and/or special diet according to district or center policies. This information will be posted in the Emergency Binder, in the classroom, and posted in a visible location in the kitchen.
7. The Nutrition Specialist will coordinate with other specialists and staff members to ensure individualization of meals and snacks.
8. For children with severe food allergies, the "Care of Students with Diagnosed Food Allergies at Risk for Anaphylaxis" policy will be followed.