



FISH



PEANUT



TREE NUTS



WHEAT



CRUSTACEANS



MILK



SOY



EGGS

# Food Allergies for School Nutrition Directors

*Creating a Food Allergy Management Plan*

Participant's Workbook



# Food Allergies for School Nutrition Directors

*Creating a Food Allergy Management Plan*

## Participant's Workbook

Time: 12 hours

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**Key Area: 2**

**Code:** 2600 (Food Safety and HACCP)

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# Institute of Child Nutrition

## The University of Mississippi

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### **PURPOSE**

Improve the operation of child nutrition programs through research, education and training, and information dissemination.

### **VISION**

Lead the nation in providing research, education, and resources to promote excellence in child nutrition programs.

### **MISSION**

Provide relevant research-based information and services that advance the continuous improvement of child nutrition programs.

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## Introduction

According to the Centers for Disease Control and Prevention (CDC), food allergies are a growing food safety and public health concern. It is estimated that they affect 4–6% of children in the United States.

The CDC also estimates that 16–18% of children with food allergies had a reaction at schools from accidentally eating food allergens. Sicherer and company found that 25% of the severe and potentially life-threatening reactions (anaphylaxis) reported at schools happened in children with no previous food allergy diagnosis.

Section 112 of the Food Safety Modernization Act (FSMA), Food Allergy and Anaphylaxis Management, provides guidance on voluntary food allergy and anaphylaxis management for schools and early childhood education programs. The CDC published the *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs* in 2013 to respond to FSMA expectations.

Since 2004, school nutrition programs have been required to have a school food safety program based on HACCP principles to reduce or eliminate risks of food safety hazards (biological, chemical, physical, or radiological); food allergens are considered a chemical food safety hazard. The school food safety program applies to all settings in the school where food is served as part of USDA's child nutrition programs, including the cafeteria, classrooms, and other settings.

Any food allergy or food intolerance could potentially be considered a disability. Schools are required by Federal law to make a meal accommodation for a disability diagnosis made in writing by a state licensed healthcare professional.

Allergic reactions can be life-threatening and have far-reaching effects on children and their families, as well as on the schools they attend. Staff in schools should develop plans for preventing an allergic reaction and responding to a food allergy emergency.

The Participant's Workbook contains helpful information, activities, and informational sheets. This book will be a resource you can use in your schools when developing your own food allergy plan.





## Professional Standards

### FOOD SAFETY AND HACCP TRAINING – 2600

**Employee will be able to effectively utilize all program safety guidelines and health department regulations to ensure optimal food safety.**

2620 - Food Safety - General

2630 - Federal, State, and Local Food Safety Regulations

2640 - Food Safety Culture

#### Key Area: 2

### Training Objectives

1. Evaluate the impact that an allergic reaction incident may have on a school.
2. Describe a food allergy, its symptoms, and treatment methods.
3. Identify the eight major food allergens.
4. Distinguish between food allergy and food intolerance.
5. Demonstrate how to find the eight major food allergens in the ingredient statement on the food label.
6. Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.
7. Outline methods for managing food labels.
8. Explain cross contact.
9. Examine how cross contact may occur, and develop strategies for preventing it.
10. List the laws for accommodating students with food allergies, and describe how they impact a school nutrition program.
11. Discuss accommodating child with food allergies and the documentation needed.
12. Determine how to engage and educate stakeholders in managing food allergies in schools.
13. Determine strategies to manage food prepared and served outside of the cafeteria.
14. Analyze the roles of various stakeholders in food allergy management at a school.
15. Finalize an outline of a food allergy management plan.



## Key Terms

| Key Terms   | Definition   |
|---|--|
| 504 Plan  | A written document that contains the services to be provided to a child with a disability, to comply with provisions in Section 504 of the Rehabilitation Act (1973) |
| Allergen  | Usually harmless substance in a food that can trigger an immune response in a person and cause an allergic reaction  |
| Allergic Reaction   | Immune system reacts to a usually harmless substance in a food   |
| Americans with Disabilities Act (1990) (ADA)                | Prohibits discrimination and ensures equal opportunity for Americans with disabilities   |
| Anaphylaxis   | A serious food allergic reaction that is rapid in onset and can cause death  |
| Celiac Disease  | An immune reaction only in the small intestines caused by eating gluten and managed with a strict gluten-free diet   |
| Cross Contact   | Occurs when an allergen is accidentally transferred from a food containing an allergen to a food or surface that does not contain an allergen                        |
| Cross Contamination   | Occurs when microorganisms from different sources contaminate food during preparation or storage   |
| Epinephrine   | Medicine (adrenaline) used to treat a serious allergic reaction  |
| Family Educational Rights and Privacy Act (1974) (FERPA)    | Federal program that protects the privacy of information entered into a student's record   |
| Food Allergen Labeling and Consumer Protection Act (FALCPA) | Labeling law that mandates labels of foods containing the major eight allergens and declare the allergen in plain language   |
| Food Allergy  | An immune reaction to a food protein. Symptoms range from mild to severe; could be life-threatening  |
| Food Intolerance  | An abnormal response to eating; not life-threatening and does not involve the body's immune system   |
| Gluten  | Protein found primarily in wheat, barley, and rye; can sometimes be found in oats  |

| Key Terms  | Definition   |
|--|--|
| Gluten Intolerance   | Food intolerance that can cause digestive problems after eating gluten   |
| Health Insurance Portability and Accountability Act (1996) (HIPAA) | Federal program that requires all medical records in any form to be kept properly confidential   |
| Individualized Education Plan (IEP)                                | A written document that contains the program of special education provided to a child with a disability; to comply with provisions Part B of the Individuals with Disabilities Education Act 2006 (IDEA) |
| Individuals with Disabilities Education Act (IDEA) (1975, 2006)    | Federal law that requires a free and appropriate public education be provided for children with disabilities   |
| Lactose Intolerance  | Food intolerance that causes digestive problems after eating or drinking lactose; individuals with lactose intolerance do not produce enough lactase enzymes in the small intestines.                    |
| Phenylketonuria (PKU)  | A rare condition in which a person cannot properly break down the amino acid phenylalanine   |
| Rehabilitation Act of 1973   | Federal law that prohibits discrimination against qualified persons with disabilities  |
| State Licensed Healthcare Professional                             | Individual who is authorized to write medical prescriptions under state law; examples include doctor, nurse practitioner, or physician's assistant   |

## Lesson 1: All About Food Allergies

### Objectives:

1. Evaluate the impact that an allergic reaction incident may have on a school.
2. Describe a food allergy, its symptoms, and treatment methods.
3. Identify the eight major food allergens.
4. Distinguish between food allergy and food intolerance.



# Reflection and Impact

**Instructions:** Take one minute to reflect on the *Caitlin Remembered* video. In groups, share your reflections. As a group, write and then share what you collectively took away from the video.

|              |   |
|--------------|---|
| <b>FEEL</b>  | <i>How do I feel from what I’ve just seen in the video?</i>                               |
| <b>THINK</b> | <i>What are the most important ideas I have heard from the group reflections?</i>         |
| <b>DO</b>    | <i>How can I use this reflection knowledge? What will I do differently in the future?</i> |





## Food Allergy Fact Sheet

### What is a food allergy?

An immune-mediated adverse reaction to a food protein that could cause a life threatening response

### What are the symptoms?

One or more symptoms can occur and can be MILD to SEVERE. According to Food Allergy Research and Education (FARE), symptoms may include:

- Hives (reddish, swollen, itchy areas on the skin)
- Eczema (a persistent dry, itchy rash)
- Itchy red rash
- Repetitive coughing
- Hoarse voice
- Nausea & vomiting
- Diarrhea
- Abdominal cramping
- Swelling
- Stomach pain
- Nasal congestion or a runny nose
- Sneezing
- Slight, dry cough
- Odd taste in mouth
- Trouble swallowing
- Shortness of breath
- Turning blue
- Drop in blood pressure (feeling faint, confused, weak, passing out)
- Loss of consciousness
- Chest pain
- A weak or “thready” pulse
- Sense of “impending doom”

### How might a child describe an allergic reaction?

- This food is too spicy.
- My tongue is hot (or burning).
- It feels like something is poking my tongue.
- My tongue (or mouth) is tingling.
- My tongue (or mouth) itches.
- My mouth feels funny.
- There is a frog in my throat.
- There's something stuck in my throat.
- My lips feel tight.
- My throat feels thick.
- It feels like there is a bump on the back of my tongue.

### What is anaphylaxis?

A severe allergic reaction with rapid onset and may cause death

### What are the treatment methods?

- Epinephrine
- Antihistamine, if ordered by healthcare provider
- Inhaler (bronchodilator), if ordered by healthcare provider

### How to avoid an allergic reaction?

- Total avoidance of allergen food protein



















## Food Allergy Emergency

**Instructions:** Answer the questions for your school district. If you have multiple schools, choose one to focus on while answering these questions.

| Question   | Notes |
|--|-------|
| A child has a reaction in the cafeteria, what do you do first?   |       |
| Do you know how epinephrine is administered?   |       |
| Who can administer epinephrine?  |       |
| Where would you get epinephrine if you were in the presence of a child having an allergic reaction?                          |       |
| Does the child with a known life-threatening food allergy carry an auto-injector?  |       |
| Is the child's auto-injector in the nurse's office?<br>Is the auto-injector available if the nurse is not in her/his office? |       |
| What if the child is having a first time allergic reaction and there is no prescription auto-injector available?             |       |
| Do you need to be trained to administer an auto-injector? Who is trained in your school?                                     |       |
| What if you inject the person and they are not really having an allergic reaction?   |       |
| Do substitutes know how to respond?<br>Volunteers?   |       |
| Do the phones near you get an outside line to call 911?  |       |
| Will local EMTs have epinephrine available for use when they arrive?   |       |



Eight Major Allergens

|   |  |
|---|--|
| <div>MILK</div> <div></div>   | <div>EGGS</div> <div></div>   |
| <div>WHEAT</div> <div></div>  | <div>PEANUTS</div> <div></div>  |
| <div>TREE NUTS<br/>(e.g. walnuts, almonds, cashews, pistachios, and pecans)</div> <div></div> | <div>SOY</div> <div></div>   |
| <div>FISH</div> <div></div>   | <div>CRUSTACEAN SHELLFISH<br/>(e.g. crab, lobster and shrimp)</div> <div></div> |



## Food Allergies and Food Intolerances

### Food Allergy

- Could possibly be life threatening
- Can cause anaphylaxis
- Involves the immune system
- Total avoidance of the known allergen
  - Touch
  - Eat
  - Smell
- Requires epinephrine for treatment
- Rapid onset

### Food Intolerance

- Similar symptoms: nausea, diarrhea, and/or vomiting
- Requires diet modification
- Schools may be required to make reasonable accommodations if there is a diagnosed disability
- Generally, is not life threatening
- Involves the digestive system with the exception of celiac disease which involves the digestive and immune system
- May be able to ingest some versions of the food such as yogurt for lactose intolerance
- Possible delayed onset





## CDC Guidelines for Managing Food Allergies

**Develop a food allergy management plan with five (5) priority areas.**

|  |
|--|
| <b>1. Ensure the daily management of food allergies in individual children.</b>  |
| <ul style="list-style-type: none"> <li>• Identify children with food allergies.</li> <li>• Develop a plan to manage and reduce the risk of food allergy reactions in individual children.</li> <li>• Help students manage their own food allergies.</li> </ul>   |
| <b>2. Prepare for food allergy emergencies.</b>  |
| <ul style="list-style-type: none"> <li>• Set up communication systems that are easy to use.</li> <li>• Make sure staff can get to epinephrine auto-injectors quickly and easily.</li> <li>• Make sure that epinephrine is used when needed and someone immediately contacts emergency medical services.</li> <li>• Identify the role of each staff member in an emergency.</li> <li>• Prepare for food allergy reactions in children without a prior history of food allergies.</li> <li>• Document the response to a food allergy emergency.</li> </ul> |
| <b>3. Provide professional development on food allergies for staff members.</b>  |
| <ul style="list-style-type: none"> <li>• Provide general training on food allergies for all staff.</li> <li>• Provide in-depth training for staff who have frequent contact with children with food allergies.</li> <li>• Provide specialized training for staff who are responsible for managing the health of children with food allergies on a daily basis.</li> </ul>  |
| <b>4. Educate children and family members about food allergies.</b>  |
| <ul style="list-style-type: none"> <li>• Teach all children about food allergies.</li> <li>• Teach all parents or guardians and families about food allergies.</li> </ul>  |
| <b>5. Create and maintain a healthy and safe educational environment.</b>  |
| <ul style="list-style-type: none"> <li>• Create an environment that is as safe as possible from exposure to food allergens.</li> <li>• Develop food-handling policies and procedures to prevent food allergens from unintentionally contacting another food.</li> <li>• Make outside groups aware of food allergy policies and rules when they use school or ECE program facilities before or after hours.</li> <li>• Create a positive psychosocial climate.</li> </ul>   |

Source: Centers for Disease Control and Prevention. (2013). *Voluntary guidelines for managing food allergies in schools and early care and education programs*. Retrieved from [www.cdc.gov/healthyyouth/foodallergies/](http://www.cdc.gov/healthyyouth/foodallergies/)



## Lesson 2: Reading Labels for Allergens

### Objectives:

1. Demonstrate how to find the eight major food allergens in the ingredient statement on the food label.
2. Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.
3. Outline methods for managing food labels.



## Reading Ingredient Statements for Food Allergens

### Food Allergen Labeling

The *Food Allergen Labeling and Consumer Protection Act* is a Federal law that became effective January 2006. It mandates that the labels of foods containing the eight major food allergens be declared in plain language on the product.

| Eight Major Allergens |           |
|-----------------------|-----------|
| Egg                   | Shellfish |
| Fish                  | Soy       |
| Peanuts               | Tree nuts |
| Milk                  | Wheat     |

There are specifics on where and how the information is to be presented. The food ingredient MUST be in the ingredient in parenthesis following the ingredient or written as the usual name of the major food allergen or listed after the ingredient list by stating product "Contains" the particular allergen.

#### **"Contains" followed by the name**

Example: "Contains: milk and wheat"

#### **Parenthetical statement or usual name in the list of ingredients**

Example: "wheat flour and albumin (egg)"

### Precautionary Labeling

There is another type of allergy labeling called precautionary labeling. This type of labeling is NOT covered in the *Food Allergen Labeling and Consumer Protection Act*, so it varies widely from manufacturer to manufacturer. One type of precautionary labeling is the "May Contain" statement. Other types of precautionary labeling are the "Made on Equipment" and "Processed in Facilities" statements.

#### **"May Contain" statement**

Example: "May contain traces of peanuts"

#### **"Made on Equipment"**

Example: "Made on equipment that makes products containing eggs and tree nuts"

#### **"Processed in Facilities"**

Example: "Processed in facilities that also processing wheat."

## Reading Ingredient Statements

Ingredient statements should be read when the product is received since suppliers may make product substitutions, formulas may change, or vendors could change. Check all labels carefully every time. Do not rely on specifications, fact sheets, or the last shipment. Read the label each time the product is received. Contact the manufacturer if you have any questions or are uncertain about the food item.

## Holding Labels

It is recommended that labels of all products served be kept for 24 hours as a precaution so the label is available in case someone has an allergic reaction. Unlike a foodborne illness outbreak where the outbreak can occur days after a food is served, an allergic reaction will happen the day of service. If food is going to be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed. Keeping a label library is a common practice; some keep the actual label, some schools can scan the label.

## Hide and Seek Label Reading

**Instructions:** Read the label ingredient statement on the wall and the **FARE Tips for Avoiding Your Allergen** handout. With your group, answer the activity questions for that label. You will have 1 minute before moving to the next label. Discuss the answers and your observations on label reading within your group. We will discuss the answers as a class.

**Label Requirement:** List major allergens in plain language in the ingredient statement. Display allergens in plain language shown: 1) in parenthesis after the ingredient in the ingredient statement [e.g. albumin (eggs)] or written as the usual name or 2) in a "Contains Statement" [e.g. Contains: eggs]

| QUESTIONS FOR LABEL A  | ANSWERS |
|--|---------|
| Which allergens are listed in Label A?                                     |         |
| Does the product label meet the allergen requirements of the labeling law? |         |

|   |
|---|
| <p><b>Label A</b></p> <p>INGREDIENTS: CULTURED PASTEURIZED SKIM MILK, MILK, WHEY PROTEIN CONCENTRATE, SALT, WHEY, NATURAL FLAVOR, XANTHAN GUM, LOCUST BEAN GUM, GUAR GUM, VITAMIN A PALMITATE, SORBIC ACID AND CARBON DIOXIDE (TO MAINTAIN FRESHNESS).</p> <p><b>CONTAINS: MILK</b></p> |
|---|

| QUESTIONS FOR LABEL B  | ANSWERS |
|--|---------|
| Which ingredients in the statement cause the manufacturer to label the product: CONTAINS MILK? |         |
| Can a child known to have a wheat allergy have this product?                                   |         |

|   |
|---|
| <p><b>Label B</b></p> <p>INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEARATE, PARTIALLY HYDROGENATED CANOLA OIL, BUTTERMILK PRODUCT, TURMERIC (COLOR).</p> <p><b>CONTAINS: MILK</b></p> |
|---|

| QUESTIONS FOR LABEL C  | ANSWERS |
|--|---------|
| Would you prepare and serve this product to a child with an egg allergy? |         |
| Does this statement meet the requirements of the labeling law?           |         |

|   |
|---|
| <p><b>Label C</b></p> <p>Ingredients: Durum flour &amp; semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid.</p> <p>Information: has wheat ingredients and is manufactured in a facility that uses eggs.</p> |
|---|

## Hide and Seek Label Reading

| QUESTIONS FOR LABEL D   | ANSWERS |
|---|---------|
| Can this product be served to a child with a known peanut allergy?              |         |
| Can this product be served to a child with known egg, wheat, and soy allergies? |         |

### Label D

Ingredients: Sunflower Seed, Sugar, Mono-Diglycerides, to prevent separation, Salt, and Natural Mixed Tocopherols to preserve freshness. Made on equipment that processes soybeans. Processed in a peanut and tree nut free facility.

| QUESTIONS FOR LABEL E  | ANSWERS |
|--|---------|
| How many of the eight (8) major allergens are in this product? List the allergens. |         |
| Can this product be served to a child with shellfish allergies?                    |         |

### Label E

INGREDIENTS: WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC\*, EXTRA VIRGIN OLIVE OIL, CONTAINS LESS THAN 2% OF: OMEGA 3 [FISH OIL AND FISH GELATIN (CONTAINS TILAPIA, SARDINE AND ANCHOVY)], ANCHOVY (FISH), LEMON JUICE CONCENTRATE, SPICE, SALT, FERMENTED WHEAT PROTEIN, YEAST EXTRACT, MALTODEXTRIN, XANTHAN GUM, PROPYLENE GLYCOL ALGINATE, POTASSIUM SORBATE, SODIUM BENZOATE AND CALCIUM DISODIUM EDTA AS PRESERVATIVES. \*DRIED.

| QUESTIONS FOR LABEL F   | ANSWERS |
|---|---------|
| Which allergen is listed in the ingredient statement but is not listed in the contains statement? |         |
| Would the missing information in the contains statement be enough for the product to be recalled? |         |

### Label F

BEEF, WATER, TEXTURED SOY PROTEIN, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY  
ALLERGIES: CONTAINS EGGS, MILK, AND WHEAT



## Tips for Managing Food Allergies in Bulk Items and USDA Foods

- Obtain the ingredient statement for the bulk product and identify any known allergens; retain the labeling on bulk packages.
  - Develop a Standard Operating Procedure for how bulk products will be handled.
    - How many lots of bulk can be mixed in one storage container?
    - How to assure what is added has the same ingredient statement?
    - How is the product scooped from bulk container?
    - How to prevent cross contact from utensils?
  - Clean the bulk storage container thoroughly to remove allergen residue before the container is used for a different product.
  - If there is any doubt of the ingredients of bulk product, contact the manufacturer for the ingredient statement.
- **Always** read USDA Foods product labels for allergens, product brands may change throughout the school year. Do not rely on USDA fact sheets.
- USDA Foods should not be labeled differently than other food items.
  - Build time in work schedule to manage food labels.



## Strategies for Managing Food Labels

**Instructions:** Using the information presented in this lesson, record what food label managing method(s) your school is currently doing and what method(s) you plan to implement in your school. As you think through managing labels, remember areas such as label storage, staff training on reading labels, dealing with bulk items, dealing with USDA Foods, and communication with manufacturers and distributors. The questions below reflect some of the points that were discussed in the lesson.

- Who reads labels for allergens?
- How often do you read labels for allergens?
- Can you get ingredient statement information before you order products?
- Do you keep product labels?
- How do you keep ingredient information for foodservice packs where the labels are printed on the case which is thrown away after stocking the shelves?
- Where are labels stored and who maintains the label list?

**How am I currently managing food labels at my school?**

**The method(s) I will implement to manage food labels are:**



## Lesson 3: Avoiding Cross Contact

### Objectives:

1. Explain cross contact.
2. Examine how cross contact may occur, and develop strategies for preventing it.



## Cleaning and Sanitizing Fact Sheet

### Introduction

Cleaning and sanitizing is an important prerequisite program for food safety in any school nutrition program. School nutrition employees who follow proper cleaning and sanitizing practices reduce the risk of cross contamination that can lead to foodborne illness and cross contact, which can contribute to an allergic reaction.

### Here Are the Facts

Research conducted by the U.S. Food and Drug Administration shows that contaminated equipment is a risk factor for food safety in retail foodservice establishments, which include schools, hospitals, nursing homes, and restaurants. This is an area in which a high number of foodservice operations did not follow appropriate practices.

### Application

**Clean and sanitize work surfaces, equipment, and other food contact surfaces using proper procedures.**

- Follow state and local health department requirements.
- Follow manufacturer's instructions regarding the use and cleaning of equipment.
- Follow manufacturer's instructions regarding the use of chemicals for cleaning and sanitizing food contact surfaces.
- Refer to the Safety Data Sheet (SDS) provided by the manufacturer if you have questions about the use of specific chemicals.
- Wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment:
  - Before each use.
  - Between uses when preparing different types of raw animal foods such as eggs, fish, meat, and poultry.
  - Between uses when preparing ready-to-eat foods and raw animal foods such as eggs, fish, meat, and poultry.
  - Any time contamination occurs or is suspected.
  - After a food with a food allergen has been prepared and before preparing an allergy-free food.
- Wash, rinse, and sanitize food contact surfaces using the following procedures:
  - Wash surface with detergent solution to clean.
  - Rinse surface with clean water to remove debris and detergent.
  - Sanitize surface using a sanitizing solution mixed at the concentration specified on the manufacturer's label.
  - Allow items to air dry.

**Take corrective action to make sure that cleaning and sanitizing is done properly.**

- Wash, rinse, and sanitize dirty food contact surfaces.
- Sanitize food contact surfaces if it cannot be determined if they have been sanitized properly.
- Discard food that comes in contact with food contact surfaces that have not been sanitized properly.

**Remember, follow state or local health department requirements.**

## Avoiding Cross Contact

**Instructions:** Work in groups to determine the solutions for different situations of possible cross contact.

| Problem  | Solution |
|--|----------|
| A knife used to spread peanut butter may also be dipped in the jelly jar, tainting the jelly with peanut protein.  |          |
| You prepare an allergen (e.g. chopping walnuts on a cutting board) and then another food (e.g. slicing tomatoes) without properly cleaning.  |          |
| Ingredients from an allergenic food may splatter, splash, or spill into the allergy-free food when making a catering platter.  |          |
| You know that a student has a severe peanut allergy. You observe that another student in the dining room has a hand full of peanuts and is laughing with friends and pointing at the boy with the allergy. |          |
| Allergy-free foods may come in contact with an allergen in storage, in the refrigerator, or the dry storage.   |          |
| Kitchens may slice various meats and cheeses on shared equipment. Meats could contain allergenic ingredients such as milk, soy, wheat, or nuts.  |          |
| Cafeteria lines and buffets may have greater risk of cross contact due to shared utensils and spills.  |          |



## Methods for Avoiding Cross Contact

**Cross Contact:** Occurs when an allergen is transferred from a food containing an allergen to a food or surface that does not contain the allergen.

**Example:** Using a knife to spread peanut butter for peanut butter and jelly sandwiches and then using the same knife to cut a turkey sandwich without cleaning and sanitizing between uses



### How to Avoid It

- Wash hands before preparing foods that are allergy-free.
- Wear single-use gloves.
- Use a clean apron when preparing allergy-free food.
- Wash with hot, soapy water making sure to scrub, then rinse and sanitize all utensils, equipment, and food contact surfaces before and after each use.
- If possible, designate an allergy-free zone in the kitchen. When working with multiple food allergies, set up procedures to prevent cross contact within the allergy-free zone.
- Prepare food items that do not contain allergens first. Label and store the allergy-free items separately.
- If possible, use clean potholders and oven mitts for allergy-free foods to prevent cross contact.





# Cleaning and Sanitizing Food Contact Surfaces

(Sample SOP)

**PURPOSE:** To prevent foodborne illness and allergic reactions by ensuring that all food contact surfaces are properly cleaned and sanitized.

**SCOPE:** This procedure applies to school nutrition employees involved in cleaning and sanitizing food contact surfaces.

**KEY WORDS:** Food Contact Surface, Cleaning, Sanitizing

## INSTRUCTIONS:

1. Train school nutrition employees on using the procedures in this SOP.
2. Follow state or local health department requirements.
3. Follow manufacturer's instructions regarding the use and maintenance of equipment and use of chemicals for cleaning and sanitizing food contact surfaces. Refer to Storing and Using Poisonous or Toxic Chemicals SOP.
4. If state or local requirements are based on the FDA *Food Code*, wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment:
  - Before each use
  - Between uses when preparing different types of raw animal foods, such as eggs, fish, meat, and poultry
  - Between uses when preparing ready-to-eat foods and raw animal foods, such as eggs, fish, meat, and poultry
  - Any time contamination occurs or is suspected
  - After a food with an allergen is prepared and before preparing an allergy-free food
5. Wash, rinse, and sanitize food contact surfaces of sinks, tables, equipment, utensils, thermometers, carts, and equipment using the following procedure:
  - Wash surface with detergent solution.
  - Rinse surface with clean water.
  - Sanitize surface using a sanitizing solution mixed at a concentration specified on the manufacturer's label.
  - Place wet items in a manner to allow air drying.
6. If a 3-compartment sink is used, set up and use the sink in the following manner:
  - In the first compartment, wash with a clean detergent solution at or above 110 °F or at the temperature specified by the detergent manufacturer.
  - In the second compartment, rinse with clean water.
  - In the third compartment, sanitize with a sanitizing solution mixed at a concentration specified on the manufacturer's label or by immersing in hot water at or above 171 °F for 30 seconds. Test the chemical sanitizer concentration by using an appropriate test kit.
7. If a dish machine is used:
  - Check with the dish machine manufacturer to verify that the information on the data plate is correct.
  - Refer to the information on the data plate for determining wash, rinse, and sanitization (final) rinse temperatures; sanitizing solution concentrations; and water pressures, if applicable.
  - Follow manufacturer's instructions for use.
  - Ensure that food contact surfaces reach a surface temperature of 160 °F or above if using hot water to sanitize.

**MONITORING:**

School nutrition employees will:

1. During all hours of operation, visually and physically inspect food contact surfaces of equipment and utensils to ensure that the surfaces are clean.
2. In a 3-compartment sink, on a daily basis:
  - Visually monitor that the water in each compartment is clean.
  - Take the water temperature in the first compartment of the sink by using a calibrated thermometer.
  - If using chemicals to sanitize, test the sanitizer concentration by using the appropriate test kit for the chemical.
  - If using hot water to sanitize, use a calibrated thermometer to measure the water temperature. It should be at or above 171 °F. Refer to Using and Calibrating Thermometers SOPs.
3. In a dish machine, on a daily basis:
  - Visually monitor that the water and the interior parts of the machine are clean and free of debris.
  - Continually monitor the temperature and pressure gauges, if applicable, to ensure that the machine is operating according to the data plate.
  - For hot water sanitizing dish machine, ensure that food contact surfaces are reaching the appropriate temperature by placing a piece of heat sensitive tape on a smallware item or a maximum registering thermometer on a rack and running the item or rack through the dish machine.
  - For chemical sanitizing dish machine, check the sanitizer concentration on a recently washed food contact surface using an appropriate test kit.

**CORRECTIVE ACTION:**

1. Retrain any school nutrition employee found not following the procedures in this SOP.
2. Wash, rinse, and sanitize dirty food contact surfaces. Sanitize food contact surfaces if it is discovered that the surfaces were not properly sanitized. Discard food that comes in contact with food contact surfaces that have not been sanitized properly.
3. In a 3-compartment sink:
  - Drain and refill compartments periodically and as needed to keep the water clean.
  - Adjust the water temperature by adding hot water until the desired temperature is reached.
  - Add more sanitizer or water, as appropriate, until the proper concentration is achieved.
4. In a dish machine:
  - Drain and refill the machine periodically and as needed to keep the water clean.
  - Contact the appropriate individual(s) to have the machine repaired if the machine is not reaching the proper wash temperature indicated on the data plate.
  - For a hot water sanitizing dish machine, retest by running the machine again. If the appropriate surface temperature is still not achieved on the second run, contact the appropriate individual(s) to have the machine repaired. Wash, rinse, and sanitize in the 3-compartment sink until the machine is repaired, or use disposable single service/single-use items if a 3-compartment sink is not available.
  - For a chemical sanitizing dish machine, check the level of sanitizer remaining in bulk container. Fill, if needed. "Prime" the machine according to the manufacturer's instructions to ensure that the sanitizer is being pumped through the machine. Retest. If the proper sanitizer concentration level is not achieved, stop using the machine and contact the appropriate individual(s) to have it repaired. Use a 3-compartment sink to wash, rinse, and sanitize until the machine is repaired.

**VERIFICATION AND RECORD KEEPING:**

School nutrition employees will record monitoring activities and any corrective action taken on the Food Contact Surfaces Cleaning and Sanitizing Log. The school nutrition manager will verify that employees have taken the required temperatures and tested the sanitizer concentration by visually monitoring school nutrition employees during the shift and reviewing, initialing, and dating the Food Contact Surfaces Cleaning and Sanitizing Log. The log will be kept on file for at least 1 year. The school nutrition manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

**DATE IMPLEMENTED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVIEWED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVISED:** \_\_\_\_\_ **BY:** \_\_\_\_\_



# Serving Safe Food to Students with Food Allergies

## (Sample SOP)

**PURPOSE:** To serve safe and nutritious meals to students with food allergies.

**SCOPE:** This procedure applies to child nutrition employees involved in preparing and serving food to students with food allergies.

**KEY WORDS:** Allergies, Cleaning, Cross contact, Handwashing

### INSTRUCTIONS:

1. Follow policies and procedures of your child nutrition operation and school district.
2. Use your receiving procedures.
  - Check all ingredient labels each time a food is purchased.
  - Date each food item when received.
3. Store food items that contain allergens in a separate location from the non-allergenic items.
4. Keep ingredient labels for a minimum of 24 hours after serving the product.
5. Prevent cross contact during food preparation.
  - Wash hands before preparing foods.
  - Wear single-use gloves.
  - Use a clean apron when preparing allergy-free food.
  - Wash with hot, soapy water, rinse, and sanitize all cookware before and after each use.
  - Wash with hot, soapy water, rinse and sanitize food contact surfaces with wash cloths and buckets that are designated allergy-free.
  - Designate an allergy-free zone in the kitchen. When working with multiple food allergies, set up procedures to prevent cross contact within the allergy-free zone.
  - Prepare food items that do not contain allergens first. Label and store the allergy-free items separately.
  - Use a clean, sanitized cutting board when preparing food.
  - Use clean potholders and oven mitts for allergy-free foods to prevent cross contact.
6. Prevent cross contact during meal service.
  - Set aside food for students with food allergies from self-service food areas, such as salad bars, before the food is set out.
  - Use dedicated serving utensils and gloves for allergy-free foods.
  - Label items on the serving line correctly and clearly so that items containing food allergens are easily recognizable.
  - Ensure that tables and chairs are cleaned and sanitized before and after each meal and when needed.
7. Follow your school's procedures for identifying students with food allergies.

### MONITORING:

A child nutrition employee continually monitors receiving, preparation, and serving areas to assess whether food allergy procedures are being followed.

### CORRECTIVE ACTION:

1. Retrain any child nutrition employee found not following the procedures in this SOP.
2. Do not serve any food to a student with a food allergy if there is any question as to whether or not an allergen might be present in that particular food.
3. Activate the school emergency action plan immediately if a student with the potential for anaphylaxis consumes a food allergen.

**VERIFICATION AND RECORD KEEPING:**

The school nutrition manager will observe school nutrition staff to make sure they are following these procedures and are taking all necessary corrective actions. Keep a list of corrective actions taken.

**DATE IMPLEMENTED:** \_\_\_\_\_ **BY:** \_\_\_\_\_








**DATE REVIEWED:** \_\_\_\_\_ **BY:** \_\_\_\_\_

**DATE REVISED:** \_\_\_\_\_ **BY:** \_\_\_\_\_



## Flow of Food SOPs

**Instructions:** For your school kitchen, write situations where cross contact can occur during the flow of food process. Then, write what procedures and SOPs you can use to prevent those situations. Use the **Cleaning and Sanitizing Food Contact Surfaces (Sample SOP)** and **Serving Safe Food to Students with Food Allergies (Sample SOP)** for ideas.

| Flow of Food Chart  |                      |                                   |
|---|----------------------|-----------------------------------|
|   | Cross Contact Occurs | SOP and Procedure for Avoiding It |
| <b>Receive</b><br>   |                      |                                   |
| <b>Store</b><br>     |                      |                                   |
| <b>Prepare</b><br> |                      |                                   |
| <b>Cook</b><br>    |                      |                                   |
| <b>Hold</b><br>    |                      |                                   |
| <b>Serve</b><br>   |                      |                                   |
| <b>Store</b><br>   |                      |                                   |



## Lesson 4: Accommodating Food Allergies in Schools

### Objectives:

1. List the laws for accommodating students with food allergies, and describe how they impact a school nutrition program.
2. Discuss accommodating child with food allergies and the documentation needed.
3. Determine how to engage and educate stakeholders in managing food allergies in schools.
4. Determine strategies to manage food prepared and served outside of the cafeteria.



## Food-Related Laws

| Federal Laws   |   |
|--|---|
| Law  | How it Relates to School Nutrition  |
| Rehabilitation Act of 1973   | Prohibits discrimination against qualified persons with disabilities in programs or activities of any agency of the Federal government's executive branch or any organization receiving Federal financial assistance: <ul style="list-style-type: none"> <li>• National School Lunch Program</li> <li>• School Breakfast Program</li> <li>• Fresh Fruit &amp; Vegetable Program</li> <li>• After School Snack Program</li> </ul> 504 Plan derived from this law |
| Individuals with Disabilities Education Act (IDEA )1975, Part B 2006 | Requires a free and appropriate public education be provided for children with disabilities aged 3–21<br>IEP Plan derived from this law   |
| Americans with Disabilities Act (ADA) 1990 and 2008 Amendments       | Broadens and extends civil rights protections for approximately 50 million Americans with disabilities<br>According to the ADA, all food allergies and intolerances have the potential to be considered disabilities  |
| The Health Insurance Portability & Accountability Act (HIPPA) 1996   | Requires all medical records disclosed be kept properly confidential<br>Gives the patient rights to control how health information is used  |
| Family Educational Rights and Privacy Act (FERPA) 1974               | Protects the privacy of health information entered into a student's record  |

Source: USDA. (2017). *Accommodating children with disabilities in the school meal programs - Guidance for school food service professionals*. Retrieved from <https://www.fns.usda.gov/2017-edition-accommodating-children-disabilities-school-meal-programs>



## Food Allergy Stakeholders

### School Administrator (Principal)

- Ensure that food allergy policies are being implemented by all school staff.
- Ensure that school rules are being followed to prohibit discrimination and bullying.
- Provide professional development on food allergies to all school staff.
- Ensure that students with food allergies accommodations are met according to their 504 or Individual Education Plan (IEP).
- Ensure emergency response protocol to accommodate students with food allergies are in place.

### School Nutrition Staff

- Prevent cross contact of potential food allergens by following food safety Standard Operating Procedures (SOP).
- Follow food allergy policies and procedures set by school district.
- Communicate and share with school staff, parents or guardians, and students the ingredient statement information.
- Ensure a safe school environment by reporting any discrimination or bullying.
- Have in place a system to identify students with food allergies without compromising privacy or confidentiality rights.
- Make food accommodations for students with food allergies according to their individual emergency care plan.
- Know the emergency response protocol to accommodate students with food allergies.
- Attend professional development on food allergies.

### School Nurse

- Follow food allergy policies and procedures set by school district.
- Ensure that each student with food allergies has an emergency care plan on file.
- Communicate and share with school nutrition the emergency care plans of all students with food allergies.
- Know the emergency response protocol to accommodate students with food allergies.
- Attend professional development on food allergies.
- Follow medication protocol as written by a state licensed health care professional.
- Ensure a safe school environment by reporting any discrimination or bullying.

### Teachers, Teaching Assistants, Volunteers, Paraeducators, etc.

- Follow food allergy policies and procedures set by school district.
- Work with the parent(s) or guardian(s) and student with food allergies to determine any needed classroom accommodations.
- Know the emergency response protocol to accommodate students with food allergies.
- Ensure a safe school environment by reporting any discrimination or bullying.
- Ensure all parents or guardians and students know classroom and/or school policies for foods brought from home as they pertain to food allergies.
- Attend professional development on food allergies.

**Athletic Coach**

- Follow food allergy policies and procedures set by school district.
- Work with the parent(s) or guardian(s) and student with food allergies to determine any needed accommodations.
- Know the emergency response protocol to accommodate students with food allergies.
- Ensure a safe school environment by reporting any discrimination or bullying.
- Ensure all parents or guardians and students know school policies for foods brought from home as they pertain to food allergies.
- Attend professional development on food allergies.

**Parent or Guardian of Student with Food Allergies**

- Ensure school has the student's emergency care plan prescribed by a state licensed healthcare professional.
- Provide school with needed medication as prescribed by a state licensed healthcare professional.
- Work with school nutrition on parts of the care plan that involve food substitutions.
- Educate child about their food allergies.

**Student with Food Allergies**

- Understand known allergies depending on developmental level.
- Do not trade food with other students.
- Do not eat food with unknown ingredients list or a food known to contain allergens.
- Report any bullying.
- Report immediately if food allergen was consumed.
- Talk with school nutrition staff if unsure food served contains food allergen.

**Custodian**

- Follow food allergy policies and procedures set by school district.
- Work with school nutrition staff to ensure tables in cafeteria are cleaned properly to remove food allergens.
- Work with teachers to ensure desks in classroom are cleaned properly to remove food allergens.
- Attend professional development on food allergies.

**Bus Driver**

- Follow food allergy policies and procedures set by school district.
- Do not allow any eating on the bus.
- Know the emergency response protocol to accommodate students with food allergies.
- Ensure a safe school environment by reporting any discrimination or bullying.
- Attend professional development on food allergies.

Source: Centers for Disease Control and Prevention. (2013). *Voluntary guidelines for managing food allergies in schools and early care and education programs*. Retrieved from [www.cdc.gov/healthyyouth/foodallergies/](http://www.cdc.gov/healthyyouth/foodallergies/)



## CDC Food Allergy Training Recommendations for Schools

| General training for all staff  |  |
|---|--|
| Who this includes   | Training recommendations   |
| <ul style="list-style-type: none"> <li>• Administrators</li> <li>• School nutrition staff (including contract staff)</li> <li>• Classroom and specialty teachers</li> <li>• Athletic coaches</li> <li>• School counselors</li> <li>• Bus drivers</li> <li>• Custodial and maintenance staff</li> <li>• Therapists</li> <li>• Paraeducators</li> <li>• Special education service providers</li> <li>• Librarians and media specialists</li> <li>• Security staff</li> <li>• Substitute teachers</li> <li>• Volunteers such as playground monitors and field trip chaperones</li> </ul> | <ul style="list-style-type: none"> <li>• School program policies and practices</li> <li>• Overview of food allergies</li> <li>• Definitions of key terms, including food allergy, major allergens, epinephrine, and anaphylaxis</li> <li>• Difference between potentially life-threatening food allergy and other food-related problems</li> <li>• Signs and symptoms of a food allergy reaction and anaphylaxis</li> <li>• Information on common emergency medications</li> <li>• General strategies for reducing and preventing exposure to allergens (in food and nonfood items)</li> <li>• Policies on bullying and harassment for children with food allergies</li> <li>• School's emergency plans, including who will be contacted in the case of an emergency, how staff will communicate during a medical emergency, and what essential information they will communicate</li> </ul> |

| In-depth training for staff who have frequent contact with children with food allergies   |  |
|---|--|
| Who this includes   | Training recommendations   |
| <ul style="list-style-type: none"> <li>• Identified classroom and specialty teachers</li> <li>• Paraeducators</li> <li>• Athletic coaches</li> <li>• Bus drivers</li> <li>• School nutrition managers</li> <li>• Other school nutrition staff who prepare, handle, or serve food</li> </ul> | <ul style="list-style-type: none"> <li>• Responding to a food allergy emergency</li> <li>• Information about Federal laws (i.e. ADA, Section 504, and FERPA), state laws (including regulations), or district policies</li> <li>• Administering an epinephrine auto-injector for trained staff</li> <li>• Helping children treat their food allergy episodes</li> <li>• Effects of food allergies on children's behavior and ability to learn</li> <li>• Importance of giving emotional support to children with food allergies and to children who witness a food allergy reaction</li> <li>• Common risk factors, triggers, and areas of exposure to food allergens in schools</li> <li>• Strategies for integrating children with food allergies into school and class activities while reducing the risk of exposure to allergens in classrooms, during meals, during nonacademic outings, on field trips, during official activities before and afterschool, and during events sponsored by schools that are held outside of regular hours</li> <li>• Some strategies include:             <ul style="list-style-type: none"> <li>▪ Special seating arrangements when age and circumstances are appropriate</li> <li>▪ Procedures for keeping foods with allergens separated from allergy-free foods</li> </ul> </li> </ul> |

- Washing hands and cleaning surfaces to reduce the risk of cross contact
- Importance of not sharing food
- Reading food labels for food allergens

### Specialized training for staff responsible for managing the health of children with food allergies on a daily basis

| Who this includes   | Training recommendations   |
|---|--|
| <ul style="list-style-type: none"> <li>• District nurses</li> <li>• School nurses</li> <li>• School doctors</li> <li>• Professionally qualified health coordinators or managers</li> <li>• School nutrition director</li> </ul> | <ul style="list-style-type: none"> <li>• Creating an emergency care plan               <ul style="list-style-type: none"> <li>▪ Review or develop other individual care plans as needed</li> </ul> </li> <li>• Managing and storing medication</li> <li>• Delegating and training unlicensed assistive personnel to administer epinephrine</li> <li>• Helping children manage their food allergies</li> <li>• Documenting the tasks performed for food allergy management</li> <li>• Evaluating emergency responses and staff members' ability to respond to food allergy emergencies</li> </ul> |

### Training recommendations for teaching children

- Identifying signs and symptoms of anaphylaxis and other food allergy reactions
- Knowing and understanding why it is wrong to tease or bully people with food allergies
- Knowing and understanding the importance of finding a staff member when there is a suspected food allergy emergency
- Understanding rules on handwashing, food sharing, allergy-safe zones, and personal conduct

### Training recommendations for teaching all parents or guardians and families

- Increase awareness and understanding of food allergies, the policies and practices that protect children with food allergies
- Roles of all staff members in protecting children with food allergies
- Measures parents or guardians of children with and without food allergies can take to help ensure this protection
- Teachers
  - Measures preventing food allergy reactions in the classroom
- School nutrition staff
  - USDA regulations and practices that protect children
  - Managing food allergies during meals served
- District and school administration
  - Policies and protocols to prevent bullying
  - Responding to food allergy emergencies
  - Creating a safe environment for all children

Source: Centers for Disease Control and Prevention. (2013). *Voluntary guidelines for managing food allergies in schools and early care and education programs*. Retrieved from [www.cdc.gov/healthyyouth/foodallergies/](http://www.cdc.gov/healthyyouth/foodallergies/)

# Develop Plan to Promote Food Allergy Awareness in Schools

**Instructions:** Review the **Food Allergy Stakeholders** handout and select one stakeholder from the list. Write out at least one way to promote food allergy awareness to that stakeholder.

| Who is my target audience?<br>(Stakeholder) | How will I promote? | What is my timeline? |
|---|---------------------|----------------------|
|   |                     |                      |



## Reduce the Risk

**Instructions:** Work in small groups to determine how to safely provide food from an outside source to a child with known life-threatening food allergies. You will be given a description of a child faced with a particular situation. Record the actions you would take to provide for the child on the flip chart paper. Select a spokesperson from your group to share the situation and the actions your group would take to provide for the child.

| Group    | Scenario  | Actions to Provide |
|----------|---|--------------------|
| <b>A</b> | Xander has allergies to peanuts and tree nuts. His eighth grade class is planning a field trip to a Japanese restaurant.  |                    |
| <b>B</b> | Ashlee was exposed to eggs in food brought into the classroom by a parent or guardian for a celebration. The celebration food was served at the same time breakfast was being served in the classroom. She had an anaphylactic response. Her teacher recognized the allergic symptoms and called school nutrition staff for help. |                    |
| <b>C</b> | Chris, age 7, is allergic to wheat and soy. You are serving food from a local Mexican restaurant to celebrate Cinco de Mayo.  |                    |
| <b>D</b> | Jasmine has a history of anaphylaxis in response to milk. Jasmine goes to the afterschool program where snacks are prepared by the cafeteria staff and served by the program staff. Snacks from donations are served, too.  |                    |
| <b>E</b> | Rachel, age 12, tells the cafeteria monitor that "my throat is sore." The teacher notices that Rachel is flushed and developing hives. Rachel has no history of a food allergy. The school nurse is at another school today.  |                    |



## Lesson 5: Food Allergy Management Plan

### Objectives:

1. Analyze the roles of various stakeholders in food allergy management at a school.
2. Finalize an outline of a food allergy management plan.





## Food Allergy Tabletop Exercise

These fictitious events unfold at the beginning of a holiday weekend. As the events in this scenario are described, consider what would happen after an emergency like this one if it were to happen in your school district. Are there policies in place for review that includes school administrators, school nurses, transportation staff, bus drivers, parents or guardians, EMS responders, teachers and other school staff, students, and other stakeholders?

This scenario starts outside of the cafeteria but shows how different stakeholders are involved in food allergy management at a school. At each time marker in this following scenario, consider these questions as they apply to your school district's food allergy response policies and procedures.

## Friday, October 6 – 1:47 pm

Bus 715 departs from Zinnia Glade Elementary School immediately after lunch is served, with 48 excited K-5th graders on board. It is an early release day, and the kids are headed home for a holiday weekend. The kids are animated and full of energy. Several girls who don't usually ride the bus are on Bus 715, with plans to attend a birthday sleepover at the home of a child on this route. This, along with the holiday, has caused more chaos than usual for a Friday afternoon.

Tammy, the driver who regularly covers route 715, is on duty. Tammy strictly enforces the school district's established "no eating" policy on her bus. She is an experienced and conscientious driver who has been consistently recognized for excellent service.

1. Does your state (or district, if applicable) recognize bus drivers as school officials (i.e. have access to student information)?

As such, do they have access to student information, including approved reasonable modifications, IEPs, 504 plans, or allergy action plans? If so, do they know where these documents are kept?

If they have access to student information, are they authorized to have any of this information with them on the vehicle? In what form?

2. Since there are kids on the bus that do not normally ride Bus 715, or ride the bus at all ("guest riders"), is there a contingency plan to cover this scenario?

Is there a mechanism for informing the bus driver that guests have serious allergies or other conditions?

3. Do bus drivers understand Federal and state laws that protect the privacy and confidentiality of students' medical information?

## Friday, October 6 – 1:51 pm

The bus has reached its first stop. As kids are exiting the bus, several students near the back of the bus shout with alarm. Celia, a third grader who is one of the guest riders on Bus 715, is in obvious distress. Celia's face appears to be swollen, and she is struggling to take a full breath. Other students are gathered around her, some trying to help, and others in fear. Tammy stops the bus and proceeds to clear a path to Celia.

1. Is medical emergency/allergy response training offered to school transportation officials in your school district?

Who provides the training?

2. Are bus drivers trained in how to recognize and manage any emergency inside the vehicle that requires their immediate attention?
3. Are medical emergency and safety trainings provided to all school personnel to include how to recognize and treat allergic reactions?
4. Are transportation assistants or patrols employed in your school district?

Have they received training?

5. Does a plan for substitute drivers exist to make them aware of policies, procedures and students' needs?

## Friday, October 6 – 1:52 pm

Tammy reaches the back of the bus. She recognizes the severity of the situation and calls 9-1-1 from her mobile phone. She returns to the front of the bus to use her radio to communicate to the school.

1. Who should call 9-1-1 in a food allergy emergency, and by what method (personal phone, work phone, radio to school, etc.)?
2. Does your school district have procedures in place to handle medical emergencies while students are on buses?
3. How frequently are communications devices checked to ensure they are in working order?

Are bus drivers and schools aware of any areas with poor reception?

## Friday, October 6 – 1:53 pm

Tammy returns to the back of the bus to comfort and support Celia. She tries to create space around Celia, while striving to keep the other kids calm. Tammy asks several of the fifth grade bus patrol helpers to help keep the younger kids quiet.

1. If there is a medical emergency on a bus in your school district, who will explain the situation to the students on the bus?

What will they do to assure and calm students?

2. Who will explain the situation to parents or guardians who may be meeting their children at the bus stop?

What information can be shared, and what information must be protected?

## Friday, October 6 – 1:54 pm

Administrative staff at Zinnia Glade Elementary School contacts Celia's parents immediately and informs them that emergency personnel are on the way to the reported location of Bus 715.

1. Is there a procedure for contacting parents or guardians in an emergency?

Does the responsible party for contacting the parents or guardians have immediate access to emergency contact information?

2. Will school staff be able to tell parents or guardians which medical facility the student will be transported to?

## Friday, October 6 – 1:58 pm

Celia's condition continues to deteriorate, and she is having more and more trouble breathing. The swelling in her face has worsened as well. Tammy is concerned that help might not arrive in time.

1. Do you know your state laws regarding EpiPen/epinephrine use and/or bus driver procedures during severe allergic reactions?
2. Can bus drivers or transportation aides carry stock epinephrine in your state?
3. What kind of training is authorized for bus drivers or transportation aides who carry stock epinephrine?

Who conducts the training?

## Friday, October 6 – 2:00 pm

The ambulance arrives, determines that anaphylactic shock is in progress, administers epinephrine, and transports Celia to the hospital for further care.

1. If this situation occurs in your school district, will someone accompany the student in the ambulance?
2. If your district authorizes the use of transportation aides, what role would they play in this situation?



## Friday, October 6 – 2:15 pm

Tammy reassures the other students that their classmate is receiving the best care possible. Although Tammy is shaken, she completes her route and returns to the school to debrief her management.

1. Are the buses that operate in your school district routinely cleaned, using methods that will remove possible allergens?
2. Are there reporting procedures for bus drivers to follow in relaying information about emergencies to their management?

Who receives the reports?

## Tuesday, October 10 – 8:30 am

After the holiday, Principal Skinner visits the School Nutrition Department, accompanied by the nursing supervisor for the school district, Anna. Celia has recovered fully from Friday's allergic reaction and is back at school. Celia has a documented severe allergy to soy. Based on school records, Principal Skinner and Anna have determined that Celia purchased a school prepared meal on Friday. They have requested records to learn what foods were offered last Friday, and what Celia purchased for lunch.

1. Would the school nutrition program have the documentation of Celia's severe allergy to soy?

Where is it located?

2. Does your school have detailed point of sale records that indicate which meals or a la carte items were purchased by students?

Is it easily accessible by school authorities?

How long is this information kept on file?

3. Has your school district provided notice to families that it does not discriminate on the basis of disability in its programs and activities?
4. Does your school district provide special meals (reasonable modification), at no extra charge, to students whose allergy or disability impacts their diet?

## Tuesday, October 10 – 9:15 am

A review of school nutrition records show that Italian chicken made with Italian dressing as a marinade was on the menu that day, and there is some suspicion that a soy ingredient may have been present in that entrée. A closer review shows that Celia did purchase Italian chicken on Friday.

1. What procedure does your school district use to identify students with severe food allergies during meal service?

How often are procedures and records reviewed?

2. Does your school district have a procedure in place for parents or guardians to request a reasonable modification(s) to accommodate food allergies?

Are members of the school staff trained on these procedures?

How are these procedures communicated to parents or guardians?

3. Has your school district designated a person to coordinate compliance with disability civil rights requirements?

Is there a grievance procedure available to families to resolve complaints of non-compliance?

Has notice been provided to students and families identifying the coordinator and explaining the complaints procedures?

## Tuesday, October 10 – 2:00 pm

Additional information identifies cold pressed soy oil as an ingredient in the Italian dressing used as a marinade for the chicken. While school nutrition staff regularly checks incoming product labels, the addition of cold pressed soy oil is a recent formulation change made by a vendor. The ingredient change went unnoticed until this incident prompted a review of the current product's labeling.

1. Does your school nutrition staff routinely review incoming product labels for ingredient changes and possible presence of food allergens?

Is this activity part of a Standard Operating Procedure?

2. Are product labels retained for future reference?

For how long?

3. Does your school nutrition management have a relationship with its distributors or vendors that would include a notification of ingredient changes made by suppliers, especially when major food allergens are involved?

Are distributors or vendors willing and/or able to provide alternative meals for students with food allergies and disabilities?

4. Does your school require vendors to provide notice of formula changes?

## Conclusion

Zinnia Glade Elementary School decides to learn and grow from their experience with Celia's allergen exposure, and they are reviewing all of their Standard Operating Procedures to make sure that responding to events like these are included in their training activities. They are gathering their resources and are answering some additional important questions about what happened on Friday, October 6.

Zinnia Glade will emphasize these facts to their stakeholders: Federal law clearly requires schools to protect the rights and privileges of children with disabilities and to ensure they have equal access to benefits when compared to children without disabilities. Federal laws and statute require schools to make meal accommodations for students that cannot consume a school meal as prepared due to a food related disability. The request for a meal accommodation must be accompanied by a note from a licensed physician or state licensed health care professional authorized to write medical prescriptions.

1. Are all school officials, including the school nutrition department, aware of the Federal laws that mandate meal accommodations for students with food related disabilities?
2. Is yearly training provided on meal accommodations and food safety to prevent cross contact and cross contamination of foods?

- For reference: May1 2017, SP 26-2017: *Accommodating Disabilities in the School Meal Programs: Guidance and Questions and Answers (Q&As)* and September 27, 2016, SP 59-2016: *Policy Memorandum on Modifications to Accommodate Disabilities in the School Meal Programs*.

## Food Allergy Resources

### Manuals

- Centers for Disease Control and Prevention. *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs.*
- National School Boards Association. *Safe at School and Ready to Learn: A Comprehensive Policy Guide for Protecting Students with Life Threatening Food Allergies.*
- U.S. Department of Agriculture, Food and Nutrition Service. *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals.*

### Website Resources

- Centers for Disease Control and Prevention  
<http://www.cdc.gov/healthyyouth/foodallergies/>
- Food Allergy Research and Education (FARE)  
<http://www.foodallergy.org/>
- NEA Health Information Network
  - <http://healthyfutures.nea.org/wpcproduct/food-allergy-book-what-school-employees-need-to-know-english/>
  - <http://healthyfutures.nea.org/wpcproduct/food-allergy-book-what-school-employees-need-to-know-spanish/>
- United States Department of Agriculture, Food and Nutrition Service  
<https://www.fns.usda.gov/ofsf/food-safety>

### ICN Resources

- Food Allergy Resources: [www.theicn.org/foodsafety](http://www.theicn.org/foodsafety)
- Food Allergy Fact Sheets: [www.theicn.org/foodsafety](http://www.theicn.org/foodsafety)
- Food Allergy Mini-poster: [www.theicn.org/foodsafety](http://www.theicn.org/foodsafety)
- Food Safety Standard Operating Procedures: <https://theicn.org/icn-resources-a-z/standard-operating-procedures/>





**APPENDIX**



## Hide and Seek Label Reading Answers

**Instructions:** Read the label ingredient statement on the wall and the **FARE Tips for Avoiding Your Allergen** handout. With your group, answer the activity questions for that label. You will have 1 minute before moving to the next label. Discuss the answers and your observations on label reading within your group. We will discuss the answers as a class.

Label Requirement: List major allergens in plain language in the ingredient statement. Display allergens in plain language shown: 1) in parenthesis after the ingredient in the ingredient statement [e.g. albumin (eggs)] or written as the usual name or 2) in a "Contains Statement" [e.g. Contains: eggs]

| QUESTIONS FOR LABEL A  | ANSWERS |
|--|---------|
| Which allergens are listed in Label A?                                     | Milk    |
| Does the product label meet the allergen requirements of the labeling law? | Yes     |

| Label A   |
|---|
| INGREDIENTS: CULTURED PASTEURIZED SKIM MILK, MILK, WHEY PROTEIN CONCENTRATE, SALT, WHEY, NATURAL FLAVOR, XANTHAN GUM, LOCUST BEAN GUM, GUAR GUM, VITAMIN A PALMITATE, SORBIC ACID AND CARBON DIOXIDE (TO MAINTAIN FRESHNESS). |
| <b>CONTAINS: MILK</b>   |

| QUESTIONS FOR LABEL B  | ANSWERS    |
|--|------------|
| Which ingredients in the statement cause the manufacturer to label the product: CONTAINS MILK? | Buttermilk |
| Can a child known to have a wheat allergy have this product?                                   | Yes        |

| Label B   |
|---|
| INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEARATE, PARTIALLY HYDROGENATED CANOLA OIL, BUTTERMILK PRODUCT, TURMERIC (COLOR). |
| <b>CONTAINS: MILK</b>   |

| QUESTIONS FOR LABEL C  | ANSWERS  |
|--|--|
| Would you prepare and serve this product to a child with an egg allergy? | No, risk of cross contact with eggs.   |
| Does this statement meet the requirements of the labeling law?           | No, it does not declare the allergen wheat correctly. Statement should be in "Contains", in parenthesis, or in usual name. |

| Label C  |
|--|
| Ingredients: Durum flour & semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid. |
| Information: has wheat ingredients and is manufactured in a facility that uses eggs.   |

## Hide and Seek Label Reading Answers

| QUESTIONS FOR LABEL D   | ANSWERS   |
|---|---|
| Can this product be served to a child with a known peanut allergy?              | Yes, it is stated that it is made in a peanut and tree nut free facility. |
| Can this product be served to a child with known egg, wheat, and soy allergies? | No, there is a risk of cross contact with soy.                            |

|  |
|--|
| <p><b>Label D</b></p> <p>Ingredients: Sunflower Seed, Sugar, Mono-Diglycerides, to prevent separation, Salt, and Natural Mixed Tocopherols to preserve freshness. Made on equipment that processes soybeans. Processed in a peanut and tree nut free facility.</p> |
|--|

| QUESTIONS FOR LABEL E  | ANSWERS                   |
|--|---------------------------|
| How many of the eight (8) major allergens are in this product? List the allergens. | 4: soy, milk, fish, wheat |
| Can this product be served to a child with shellfish allergies?                    | Yes                       |

|   |
|---|
| <p><b>Label E</b></p> <p>INGREDIENTS: WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, EXTRA VIRGIN OLIVE OIL, CONTAINS LESS THAN 2% OF: OMEGA 3 [FISH OIL AND FISH GELATIN (CONTAINS TILAPIA, SARDINE AND ANCHOVY)], ANCHOVY (FISH), LEMON JUICE CONCENTRATE, SPICE, SALT, FERMENTED WHEAT PROTEIN, YEAST EXTRACT, MALTODEXTRIN, XANTHAN GUM, PROPYLENE GLYCOL ALGINATE, POTASSIUM SORBATE, SODIUM BENZOATE AND CALCIUM DISODIUM EDTA AS PRESERVATIVES. *DRIED.</p> |
|---|

| QUESTIONS FOR LABEL F   | ANSWERS   |
|---|---|
| Which allergen is listed in the ingredient statement but is not listed in the contains statement? | Soy   |
| Would the missing information in the contains statement be enough for the product to be recalled? | Yes, it is one of the major eight and is required to be declared. |

|   |
|---|
| <p><b>Label F</b></p> <p>BEEF, WATER, TEXTURED SOY PROTEIN, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY</p> <p>ALLERGIES: CONTAINS EGGS, MILK, AND WHEAT</p> |
|---|

## Avoiding Cross Contact Possible Answers

**Instructions:** Work in groups to determine the solutions for different situations of possible cross contact.

| Problem  | Solution  |
|--|---|
| A knife used to spread peanut butter may also be dipped in the jelly jar, tainting the jelly with peanut protein.  | <ul style="list-style-type: none"> <li>• Keep a separate jelly jar for the child with allergies. Use clean spoon to put jelly on bread.</li> <li>• Put jelly on first using a separate spoon.</li> </ul>  |
| You prepare an allergen (e.g. chopping walnuts on a cutting board) and then another food (e.g. slicing tomatoes) without properly cleaning.  | Make the allergen safe food first. Clean cooking equipment including the cooking area with hot, soapy water.  |
| Ingredients from an allergenic food may splatter, splash, or spill into the allergy-free food when making a catering platter.  | Prepare the allergy-free foods first, cover, and remove from the cooking area prior to preparing the foods for others.  |
| You know that a student has a severe peanut allergy. You observe that another student in the dining room has a hand full of peanuts and is laughing with friends and pointing at the boy with the allergy. | Go to the student with the peanut allergy and escort him from the dining room. Make sure you know where his epinephrine auto-injector is located. Tell the principal about the situation, and sit in on the meeting with the students. Also, remove the bully.  |
| Allergy-free foods may come in contact with an allergen in storage, in the refrigerator, or the dry storage.   | Designate a separate shelf in the refrigerator and cupboard for allergy-free foods. This shelf should be above the shelf that may store foods with potential allergens. Consider using stickers to identify "safe" foods. Discard anything that is suspected of cross contact, or do not use it for the child with allergies. |
| Kitchens may slice various meats and cheeses on shared equipment. Meats could contain allergenic ingredients such as milk, soy, wheat, or nuts.  | <ul style="list-style-type: none"> <li>• Make sure staff are following Standard Operating Procedures to clean equipment.</li> <li>• Slice allergy-free food first.</li> </ul>   |
| Cafeteria lines and buffets may have greater risk of cross contact due to shared utensils and spills.  | Have the school nutrition manager keep the safe food separate to prevent cross contact.   |

## Reduce the Risk Possible Answers

**Instructions:** Work in small groups to determine how to safely provide food from an outside source to a child with known life-threatening food allergies. You will be given a description of a child faced with a particular situation. Record the actions you would take to provide for the child on the flip chart paper. Select a spokesperson from your group to share the situation and the actions your group would take to provide for the child.

| Group    | Scenario  | Actions to Provide  |
|----------|---|---|
| <b>A</b> | Xander has allergies to peanuts and tree nuts. His eighth grade class is planning a field trip to a Japanese restaurant.  | Obtain a copy of the restaurant's menu and speak with the child to make a food selection free of peanuts and tree nuts. Speak with the restaurant manager before the field trip and alert them that a child with allergies will be in the group. Assure field trip chaperone is aware and knowledgeable on food allergies. Be sure Xander's auto-injector is in the medical pack and goes with him on the field trip. |
| <b>B</b> | Ashlee was exposed to eggs in food brought into the classroom by a parent or guardian for a celebration. The celebration food was served at the same time breakfast was being served in the classroom. She had an anaphylactic response. Her teacher recognized the allergic symptoms and called school nutrition staff for help. | Follow emergency food allergy action plan. Immediately call 911 for emergency medical services to come to the school; tell them an allergic reaction is suspected and to bring epinephrine. Notify parents or guardians. Make sure Ashlee is only offered allergy-free foods.   |
| <b>C</b> | Chris, age 7, is allergic to wheat and soy. You are serving food from a local Mexican restaurant to celebrate Cinco de Mayo.  | Obtain a copy of the restaurant's menu and speak to the restaurant manager about what allergens are in the foods. Make some wheat and soy free menu options. Assist child to select wheat and soy free menu choices. Have servers serve the food to prevent cross contact from utensils or if the risk is too great, make a plate for the child when the food arrives; keep food separate and in a warmer.            |
| <b>D</b> | Jasmine has a history of anaphylaxis in response to milk. Jasmine goes to the afterschool program where snacks are prepared by the cafeteria staff and served by the program staff. Snacks from donations are served, too.  | Train afterschool staff to manage food allergies. Assure donations come with ingredient statements to look for allergies. Train the children in the afterschool program on the importance of no food sharing. Be sure Jasmine's auto-injector is available during the afterschool program. Have SOP for managing food allergies for afterschool program.  |
| <b>E</b> | Rachel, age 12, tells the cafeteria monitor that "my throat is sore." The teacher notices that Rachel is flushed and developing hives. Rachel has no history of food allergy. The school nurse is at another school today.  | Follow emergency food allergy action plan. Immediately call 911 for emergency medical services to come to the school; tell them an allergic reaction is suspected and to bring epinephrine. Notify parents or guardians. Notify school nurse or district nurse of the situation.  |

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