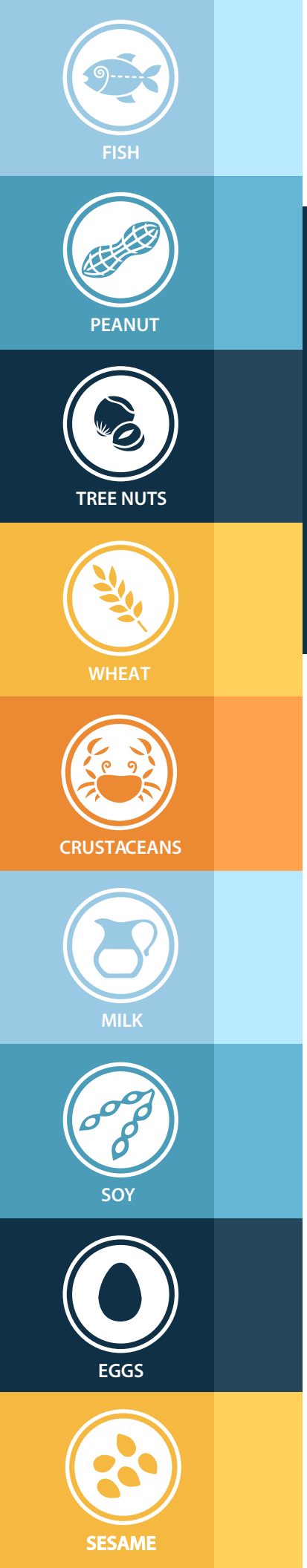

Food Allergies for School Nutrition

Instructor's Manual

INSTITUTE OF child nutrition
RESOURCES • TRAINING • RESEARCH

Food Allergies for School Nutrition

Instructor's Manual

Time: 4 hours

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EXECUTIVE DIRECTOR

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Key Area: 2

Code: 2600 (Food Safety and HACCP)

2023

Disclaimer

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Background Information

Note to Instructor: The purpose of the background information section is to help you become familiar with the context of the lesson.

According to the Centers for Disease Control and Prevention (CDC) V*oluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*, food allergies are a growing food safety and public health concern. The Food Allergy Research & Education (FARE) organization estimates that food allergies affect about 1 in every 13 children in the United States. The CDC also estimates that 16%–18% of children with food allergies experience a reaction at school from accidentally eating food allergens. Sicherer et al. 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 and Drug Administration (FDA) *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.

As explained in USDA's *Accommodating Children with Disabilities in the School Meals Programs*, school nutrition programs are required to have a school food safety program based on HACCP principles to reduce or eliminate risks of food safety hazards; food allergens are considered a safety hazard. The school food safety program applies to all settings in the school where food is stored, prepared, and served as part of USDA's child nutrition programs, including the cafeteria, classrooms, and other settings.

According to the USDA's guidance, any food allergy or intolerance could be considered a disability. Schools are required by Federal law to make meal modifications 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 students and their families, as well as on the schools they attend. School staff should follow plans to prevent an allergic reaction and respond to a food allergy emergency.

There are prompts for the instructor throughout the training to assist in teaching. Prompts are as follows:

SAY:
What the instructor is to say to participants. This content teaches the learning objectives.

ASK:
This prompt is used when the instructor should ask the participants a question. If the question warrants feedback, it will be followed by the FEEDBACK prompt.

FEEDBACK:
This prompt is used to ensure certain elements are covered in discussions, including possible answers for the instructor to give.

DO:
This prompt is used to explain what the instructor/participants are to do. It may be used to lead into activities, do demonstrations, show videos, or any other action the instructor would need to know to do.

SHOW SLIDE:
This prompt is used for showing slides. Each slide has its own unique title. All content in the slide presentation is in the Instructor's Manual using the "DO," "ASK," or "SAY" commands. Slides are not content heavy nor contain content that is not covered in the Instructor's Manual in case the slide presentation is unable to be used.

PRE-/POST-ASSESSMENTS:
This training includes a pre-/post-assessment that will be administered at the beginning and the end of the training.

Competencies, Knowledge, and Skills

Competency 2.1: Maintains sanitation, safety, and security practices in compliance with local, State, and Federal policies, procedures, and regulations.

Competency 2.2: Maintains sanitation, safety, and security practices to protect the health and well-being of students, customers, and employees.

Source: Institute of Child Nutrition. (2018). *Competencies, Knowledge, and Skills for School Nutrition Managers*. https://theicn.org/icn-resources-a-z/ckssnmanagers21

Professional Standards

FOOD SAFETY AND HACCP TRAINING – 2600

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

2620 – Practice general food safety procedures.
2630 – Practice Federal, State, and local food safety regulations and guidance.
2640 – Promote a culture of food safety behaviors in the school community (includes training on food allergens).

Key Area: 2 – Operations

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 nine major food allergens.
4. Distinguish between food allergy and food intolerance.
5. Demonstrate how to find the nine 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 nine major, are in bulk items, or are in USDA Foods.
7. Describe the procedures for reading ingredient statements.
8. Define cross-contact.
9. Examine how cross-contact may occur in a school nutrition program.
10. Develop strategies for preventing cross-contact.
11. Describe methods for accommodating and supporting students with food allergies.
12. Determine strategies to manage food prepared and served outside of the cafeteria.

Ground Rules

ICN has developed Ground Rules to help the class run smoothly and allows all participants to benefit from the course instruction and information. (These Ground Rules can be found on the ICN website – Ground Rules for Training Mini-Posters.)

Training-at-a-Glance

Time	Topic
25 minutes	Introduction • Warm-Up • Pre-Assessment
60 minutes	Lesson 1 • Food Allergies • Recognizing the symptoms of an allergic reaction • Responding to a food allergy emergency • Major nine food allergens • Food intolerances
70 minutes	Lesson 2 • Federal laws for food allergen labeling • Reading food labels for nine major allergens • Reading food labels for allergens other than the major nine, including bulk and USDA Foods • Managing food labels
45 minutes	Lesson 3 • Cross-contact • How cross-contact occurs • Methods for preventing cross-contact
25 minutes	Lesson 4 • School nutrition's role in accommodating students with food allergies • Managing outside food for food allergens
15 minutes	Wrap Up • Action plan • Post-Assessment
4 hours (240 minutes)	

Preparation Checklist

Instructions: The following tasks are necessary for presenting this training. Assign each task to a specific person and determine the date that each task must be completed. Keep track of the progress by checking off tasks as they are completed. **Reserve equipment and gather supplies as needed for use on the day of class (6 weeks prior).**

Task	Person Responsible	Completion Date	✓
Instructor's Manual Participant sign-in sheets			
List of equipment and supplies needed Microphone (preferably wireless lapel/lavalier) Projector and screen Speakers Computer to present slides and/or DVD Chart paper (self-adhesive strip) Easel Markers Timer Wireless presenter device and laser pointer Sample epinephrine auto-injectors **(1 of each brand)** Painter's tape Pens Pencils Highlighters Self-adhesive notes Name tags Table tents Black light Glo Germ® solution Two spatulas or other kitchen utensils			
Participant's Workbook			
Training Documents Agenda Roster of presenters/participants			

Task	Person Responsible	Completion Date	✓
Caitlin Remembered video (download from www.theicn.org/foodsafety) Handouts from Appendix • Allergen picture printouts • Ingredient statement printouts • Label Reading Role-Play Cards • Avoiding Cross-Contact Scenario Cards Training Evaluations Certificate of Completion			
Pre-/Post-Assessments and answers (QR code)			
Other handouts FARE handouts (one of each for every participant, see after chart for name and website locations) *Food Safety Spotlight: Food Allergies* (one per participant) found at www.theicn.org/foodsafety *School Nutrition Food Allergy Fact Sheets* resource folder (if out of print, fact sheets are available at www.theicn.org/foodsafety) USDA's *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*			

These three handouts will need to be downloaded and printed:

- **Recognize and Respond to Anaphylaxis** poster
  https://www.foodallergy.org/resources/recognizing-and-responding-reaction
- **Food Allergy & Anaphylaxis Emergency Care Plan** handout
  https://www.foodallergy.org/living-food-allergies/food-allergy-essentials/food-allergy-anaphylaxis-emergency-care-plan
- **Tips for Avoiding Your Allergen** handout
  https://www.foodallergy.org/living-food-allergies/food-allergy-essentials/common-allergens/tips-avoiding-your-allergen

Key Terms

Key Terms	Definition
504 Plan	A written document that contains the services to be provided to a student with a disability to comply with provisions in Section 504 of the *Rehabilitation Act* (1973)
Allergen	Usually harmless food protein that can trigger an immune response in a person and cause an allergic reaction
Allergic reaction	Immune system reacts abnormally to a usually harmless substance
Americans with Disabilities Act (1990) (ADA)	Prohibits discrimination and ensures equal opportunity for Americans with disabilities
Anaphylaxis	A serious allergic reaction with rapid onset that may cause difficulty breathing and death
Celiac disease	An autoimmune disorder that affects the small intestine that is triggered 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 Allergy Safety, Treatment, Education, and Research Act (2021)(FASTER)	Federal law establishing sesame as the ninth major food allergen in the United States. Law requires that sesame be listed on food label in plain language like the other major allergens. Law became effective on January 1, 2023.
Food Allergen Labeling and Consumer Protection Act (2004) (FALCPA)	Labeling law that mandates labels of foods containing the eight major allergens disclose the allergen in plain language
Food allergy	An immune-mediated adverse reaction to a food protein that could cause a life-threatening response
Food allergy management plan	A school-wide plan designed to reduce the risk of exposure to food allergens and procedures for food allergy emergencies
Food intolerance	An abnormal response to eating a certain food; not life-threatening and does not involve the body's immune system

Key Terms	Definition
Gluten	Protein found primarily in wheat, barley, and rye; can sometimes be found in oats from cross-pollination
Gluten intolerance	A form of 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 confidential
Individualized Education Plan (IEP)	A written document that contains the program of special education provided to a student with a disability; to comply with provisions found in Part B of the *Individuals with Disabilities Education Act* 2006 (IDEA)
Individualized Healthcare Plan (IHP)	A written document that outlines the requirements of student healthcare services; developed by the school nurse
Individuals with Disabilities Education Act (IDEA) (1975, 2006)	Federal law that requires a free and appropriate public education be provided for students 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

Introduction

Time	Topic	Activity	Materials
15 minutes	Introduction	Warm Up	• Chart paper • Easel • Allergen picture printouts • Painter's tape • Markers • Table tents • Sticky notes • Pen or pencil
10 minutes	Pre-Assessment	Pre-Assessment	• Pre-Assessment • Pen or pencil • Smartphone with camera
25 minutes			

Introduction

Instructor's Note: Throughout the Instructor's Manual, copies of the handouts and worksheets in the Participant's Workbook are outlined in orange. These versions may have modified formatting to fit in the Instructor's Manual, but the content will be the same.

SHOW SLIDE: *Food Allergies for School Nutrition*

SAY: Welcome to the *Food Allergies for School Nutrition* training.

SHOW SLIDE: *Food Allergies in Children*

According to the Centers for Disease Control and Prevention's (CDC) *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*, food allergies are a growing food safety and public health concern. The Food Allergy Research & Education (FARE) organization estimates that food allergies affect about 1 in 13 children in the United States. Food allergies are fairly common, and the number of children diagnosed with food allergies is increasing. The CDC guidelines report an 18% increase in the prevalence of food allergies in children from 1997 to 2007, but more recent data from 2011 found in *Trends in Allergic Conditions Among Children: United States, 1997–2011* indicates that this increase may be as high as 50%.

The consequences of food allergies can be severe. A fatal reaction can occur with even a trace amount of an allergen.

Today, we will learn more about food allergies. Before we start, let's review some logistics, complete introductions, and complete the pre-assessment.

SHOW SLIDE: *Logistics*

SAY: Each of you has a Participant's Workbook with valuable take-home resources and the activities we will be doing together.

We are hosted today by (insert name of the organization that provided the room for training). The restrooms are located (describe where the restrooms are located), and the emergency exits are located (describe where the emergency exits are located). The training will last four hours. If you have questions at any time, please write them on a sticky note and put them on the Bike Rack chart paper during the breaks.

DO: Write "Bike Rack" on top of a piece of chart paper and put it on a far wall.

ASK: Are there any questions I may answer for you at this time?

SAY: Please fold your table tents in half and write your first name in large letters on one side.

SHOW SLIDE: *Ground Rules*

SAY: ICN has developed the following Ground Rules to help this training run smoothly and allow all participants to benefit from the instruction and information.

- **Show up on time and come prepared.** Be prompt in arriving and in returning from breaks. Come with a positive attitude.
- **Stay mentally and physically present.** Be present and stay on task. Listen attentively to others and avoid disruptive side conversations.
- **Let everyone participate.** Be patient when listening to others speak. Treat all participants with the same respect that you would want from them.
- **Listen with an open mind.** Stay open to new ways of doing things, and listen for understanding. You can respect another person's point of view without agreeing with them.
- **Think before speaking.** Seek first to understand, then to be understood.
- **Attack the problem, not the person.**

SHOW SLIDE: Warm-Up Activity

DO: Activity: Warm Up

Materials: Chart paper, Allergen picture printout, painter's tape, sticky notes, pens or pencils, and easel

Time: 10 minutes (1–2 minutes of individual work, 4 minutes of mingling, and 4 minutes of debriefing)

Instructions:

1. Tape the allergen pictures to a piece of chart paper with room underneath each.
2. Give participants about 1–2 minutes to list three food allergies that students have in their school or district on sticky notes (one per sticky note).
3. For 2 minutes, have participants move around the room, introduce themselves and share their food allergies with another person. Then, cue them to move to another person for another 2 minutes.
4. Have participants place their sticky notes under the designated allergen on the chart paper.
5. Ask participants to return to their seats.
6. For 4 minutes, summarize the participants' allergies.

Instructor's Note: You will refer back to this chart paper with the allergens in Lesson 2 when discussing the nine major allergens and allergens that are not the major nine.

SAY: We can see that our schools have to manage several types of food allergies.

SHOW SLIDE: Topics for Today

SAY: Today, we will discuss the following:

- What food allergies are (definitions, symptoms, and treatment)
- How to read ingredient statements for allergens
- How to safely store, prepare, and serve food to students with food allergies
- How to accommodate and support students with food allergies in your school

SHOW SLIDE: Pre-Assessment

DO: Activity: Pre-Assessment

Materials: Pre-Assessment slide with QR Code, smartphones (each participant)

Time: 10 minutes of individual work

Instructions:

1. Read the following instructions to the participants:
    a. Using your smartphone, open the camera app.
    b. Point your camera at the QR code on this slide. Your browser should open with an ICN pre-assessment.
    c. Read the instructions on the screen. Then, read each question carefully and select the best answer.
    d. Once you have finished, select "Submit" at the bottom of the screen.
2. Allow time for participants to take the pre-assessment.

Instructor's Note: While waiting for others to finish, encourage participants who have completed the pre-assessment to review the list of key terms to familiarize themselves with some of the words and phrases that will be used during this training. They should also review the competencies, professional standards, and training objectives if time permits.

Lesson 1: All About Food Allergies

Time	Topic	Activity	Materials
	Introduction to lesson		
Objective: Evaluate the impact that an allergic reaction incident may have on a school.			
20 minutes	Impact of food allergies	The Power of a Story	• *Caitlin Remembered* video • Laptop speakers • Projector • Reflection and Impact worksheet
Objective: Describe a food allergy, its symptoms, and treatment methods.			
30 minutes	• Food Allergies • Recognizing the symptoms of an allergic reaction • Responding to a food allergy emergency	• Epinephrine Auto-Injectors Demonstration • Food Emergency Questions	• Food Allergy Fact Sheet • *FARE Recognize and Respond to Anaphylaxis* poster • Sample auto-injectors • *FARE Food Allergy and Anaphylaxis Emergency Care Plan* handout • Food Allergy Emergency worksheet
Objective: Identify the nine major food allergens.			
5 minutes	Major nine allergens	Handout and group discussion	• Nine Major Allergens handout • *FARE Tips for Avoiding Your Allergen* handout
Objective: Distinguish between food allergy and food intolerance.			
5 minutes	Food intolerances	Handout and group discussion	• Food Allergies versus Food Intolerances handout • *School Nutrition Food Allergy Fact Sheets* folder
60 minutes (1 hour)			

Lesson 1: All About Food Allergies

SHOW SLIDE: *Lesson 1: All About Food Allergies*

SAY: The first lesson is "All About Food Allergies." Our objectives for this section are to realize the impact an allergic reaction can have on students, learn about food allergies, identify the nine major food allergens, and understand the difference between food allergies and food intolerances.

To start, we will watch a video, *Caitlin Remembered*, about a student with a food allergy. The video was produced by the Center for Food Safety Research in Child Nutrition Programs. You do not need to take any notes; just give your full attention to the video.

Objective: Evaluate the impact that an allergic reaction incident may have on a school.

SHOW SLIDE: *Caitlin Remembered*

DO: Activity: The Power of a Story

Materials: *Caitlin Remembered* video, laptop speakers, projector, **Reflection and Impact** worksheet

Time: 20 minutes (8-minute video, 2 minutes individual reflection, 10 minutes class discussion)

Instructions:
1. Play the *Caitlin Remembered* video.
2. After the video, give participants 2 minutes to write their thoughts on the "FEEL" questions on the **Reflection and Impact** worksheet.
3. For 10 minutes, have some participants share and discuss their thoughts about the video. Encourage class discussion about the impact the video had on them.

Instructor's Note: This video is an impact video to reinforce the importance of having a food allergy management plan. Please reinforce at the end that this video is not real and that the people involved are actors.

Reflection and Impact

Instructions: Take 1 minute to reflect on the Caitlin Remembered video.	
FEEL	*How do I feel about what I just watched?*
THINK	*What are the most important ideas I have heard from the group reflections?*
DO	*How can I use this reflection knowledge? What will I do differently in the future?*

DO: Show video.

SHOW SLIDE: ***The Power of a Story Activity***

SAY: I know this video was hard to watch, and it has probably left you with some emotions. Let's take some time to reflect on how we feel. Please turn in your workbook to the **Reflection and Impact** worksheet. Take a minute and write down how you felt after watching the video under the "FEEL" question.

DO: Allow 2 minutes for participants to self-reflect and write.

ASK: Would anyone like to share how the video affected you?

DO: Allow 5-8 minutes for class discussion.

SAY: Please take a few moments to complete the rest of the worksheet.

DO: Allow 2 minutes for participants to self-reflect and write.

SAY: Please know that the video you just watched was a dramatization; no student actually died. Although this was staged, not following procedures for food allergies can have real consequences. The students in our schools depend on us to keep their food safe.

Objective: Describe a food allergy, its symptoms, and treatment methods.

SHOW SLIDE: ***What Is a Food Allergy?***

SAY: A food allergy is when the body mistakenly reacts to the protein of a food or ingredient as if it were harmful. The food protein that causes the reaction is called an allergen. In allergic individuals, certain foods cause the immune system to develop antibodies against the allergen (food protein). Afterward, every time that person consumes that food allergen, it can trigger various allergic symptoms.

DO: Pass out the **FARE Recognize and Respond to Anaphylaxis** poster.

Instructor's Note: The **FARE Recognize and Respond to Anaphylaxis** poster is outside of this manual in the tool kit. The link for it is in the Preparation Checklist of the Instructor's Manual.

SAY: Food Allergy Research and Education (FARE) is the nation's leading organization dedicated to food allergy research, education, advocacy, and awareness, and it is the world's largest private source of funding for food allergy research. FARE provides up-to-date food allergy resources on its website (www.foodallergy.org).

We will now discuss how to recognize the symptoms of a food allergic reaction. The content on the following few slides is found in the **Food Allergy Fact Sheet** in your Participant's Workbook and on the **FARE Recognize and Respond to Anaphylaxis** poster. Please follow along and highlight any information that you want to remember.

Food Allergy Fact Sheet

What is a food allergy?

A food allergy is when the body mistakenly reacts to the protein of a food or ingredient as if it were harmful. The food protein that causes the reaction is called an allergen.

What are the symptoms of an allergic reaction?

Knowing the symptoms of an allergic reaction can save a student's life. One or more allergic symptoms can occur and can be mild to severe. Symptoms can happen within a few minutes or up to a few hours after consuming the allergen. Students can display different symptoms, even if they have the same allergy (e.g., one student with a peanut allergy may have trouble breathing when exposed to peanuts, while another student with a peanut allergy gets hives after consuming it). Each time a student has a reaction, the symptoms may be different.

Knowing the symptoms of an allergic reaction is vital, as a student may have a reaction but not have a known allergy. As shown in the following chart, Food Allergy Research and Education (FARE) details how various symptoms can appear in the body.

Mild Symptoms	Severe Symptoms
• Gut: mild nausea or discomfort (stomach pain, abdominal cramping) • Mouth: itchy; odd taste; slight, dry cough • Nose: itchy, runny nose; sneezing; congestion • Skin: a few hives (reddish, swollen, itchy areas on the skin), mild itch (sometimes in the ear canal)	• Body: lightheadedness, fainting or loss of consciousness, anaphylaxis • Gut: repetitive vomiting or severe diarrhea • Heart: pale, turning blue, faint, weak or "thready" pulse, dizziness, chest pain, drop in blood pressure • Lung: shortness of breath, wheezing, repetitive cough, difficulty breathing • Mouth: significant swelling of the tongue or lips • Psychological: feeling something bad is about to happen, sense of impending doom, anxiety, confusion, feeling weak • Skin: many hives over the body, widespread redness, eczema • Throat: tight, hoarse, trouble swallowing or breathing, swelling

What are the treatment methods for an allergic reaction?

Treatment for an allergic reaction for a student will be determined by the State licensed healthcare professional and written in the emergency care section of the student's food allergy plan. Include specific State rules and licensing regulations about how school nutrition professionals can administer medicines in the food allergy plan. Follow the student's individual food allergy emergency care plan when responding to an allergic reaction. School nutrition staff cannot provide treatment outside of what is written in the plan. Treatments for an allergic reaction may include:

- Epinephrine (administered by an epinephrine auto-injector)
- Antihistamine
- Inhaler (bronchodilator)

How might a student describe an allergic reaction?

- This food is too spicy.
- My tongue or mouth is hot (or burning, tingling, itching, etc.).
- My tongue or mouth feels full (or heavy or funny).
- It feels like something is poking my tongue.
- My tongue feels like there is hair on it.
- It feels like there is a bump on the back of my tongue (throat).
- There's something stuck in my throat (or a frog in my throat).
- My throat feels thick.
- My lips feel tight.
- It feels like there are bugs in there. (to describe itchy ears)
- My eyes are burning (or itchy).
- My skin feels itchy.
- My stomach (or tummy) hurts.
- My chest is tight.
- Something is wrong.
- Something bad is happening.

What are some nonverbal signs of an allergic reaction?

- Putting their hands in their mouths
- Pulling or scratching at their tongues
- Slurring their words
- Their voices may change (e.g., become hoarse or squeaky)

What is anaphylaxis?

Anaphylaxis is a severe allergic reaction with a rapid onset that may cause difficulty breathing and death. It may disrupt breathing and blood circulation. An anaphylactic reaction usually occurs within minutes of being exposed to an allergen, but in some rare instances, it can occur a couple of hours later.

Symptoms of anaphylaxis include:

- Difficulty breathing, constriction of airways, tightness of the throat, hoarse voice
- Drop in blood pressure (e.g., pale, weak pulse, confusion, dizziness, fainting, weakness, loss of consciousness)
- Feeling of doom
- Gastrointestinal symptoms (e.g., abdominal pain, nausea, vomiting, diarrhea, cramping)
- Rapid pulse, cardiac arrest
- Shock (i.e., drop in blood pressure and narrowing of airways)
- Skin symptoms (e.g., hives, swelling)
- Swollen lips

How to avoid an allergic reaction?

Total avoidance of allergen food protein

Sources:

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SHOW SLIDE: *Allergic Reaction Symptoms*

SAY: Looking at the **FARE Recognize and Respond to Anaphylaxis** poster, you can see that there are a variety of symptoms for food allergies that affect different parts of the body. One or more allergic symptoms can occur and can be mild to severe.

Symptoms can occur within a few minutes or up to a few hours after the allergen is eaten. More than one symptom often presents itself.

A mild symptom could be hives (a reddish, swollen, itchy area on the skin), nausea, and vomiting, stomach pain, nasal congestion, or runny nose. A severe symptom could be swelling of the lips, tongue, or throat; shortness of breath; or a drop in blood pressure. We will review the treatment for severe symptoms in just a few minutes. Students can display different symptoms, even if they have the same allergy (e.g., one student with a peanut allergy may have trouble breathing when exposed to peanuts, while another student with a peanut allergy gets hives after consuming it). Each time a student has a reaction, the symptoms may be different.

Knowing the symptoms of an allergic reaction is vital, as a student may have a reaction but not have a known allergy. In their food allergy statistics, FARE discusses how roughly 20%–25% of epinephrine administrations in schools involve a student who does not have a known allergy. Also, more than 15% of students with food allergies have had a reaction at school.

Not everyone is aware of the symptoms of food allergic reactions, and a delay in responding to the symptoms can be life-threatening. Education and training to increase awareness of food allergies among all school community members could prevent a tragedy. Hanging posters like the **FARE Recognize and Respond to Anaphylaxis** poster can provide people with a quick resource for what to do in a suspected allergic reaction. The newest Food and Drug Administration (FDA) *Food Code* requires job-appropriate food allergy training for school nutrition professionals that needs to include how to recognize symptoms of an allergic reaction.

Perhaps, you have heard that an allergic reaction could occur from smelling or inhaling food such as peanut dust. These conditions can occur but are rare. Eating or drinking a food allergen is the most common way to trigger an allergic reaction.

SHOW SLIDE: *Treatment for Allergic Reaction*

Treatment for an allergic reaction for a student will be determined by the State licensed healthcare professional and written in the emergency care section of the student's food allergy plan. The food allergy plan should include specific State rules about how school nutrition professionals can administer medicines. When responding to an allergic reaction, follow the student's individual food allergy emergency care plan. School nutrition staff cannot provide treatment outside of what is written in the plan.

Treatments for an allergic reaction may include:

- Epinephrine (administered by an epinephrine auto-injector)
- Antihistamine
- Inhaler (bronchodilator)

SHOW SLIDE: *How a Student Might Describe Symptoms*

SAY: FARE shares *How a Child Might Describe a Reaction*. Remember, symptoms of a reaction can be mild to severe. Students might state:

- This food is too spicy.
- My tongue or mouth is hot (or burning, tingling, itching, etc.).
- My tongue or mouth feels full (or heavy or funny).
- It feels like something is poking my tongue.
- My tongue feels like there is hair on it.
- It feels like there is a bump on the back of my tongue (throat).
- There's something stuck in my throat (or a frog in my throat).
- My throat feels thick.
- My lips feel tight.
- It feels like there are bugs in there. (to describe itchy ears)
- My eyes are burning (or itchy).
- My skin feels itchy.
- My stomach (or tummy) hurts.
- My chest is tight.
- Something is wrong.
- Something bad is happening.

The person who the student tells this information will need to determine the next steps to care for the student from that student's food allergy emergency plan. If you are the person the student is speaking to, you will need to know what emergency actions to take.

SHOW SLIDE: *Nonverbal Signs of Allergic Reaction*

A student, especially a young one, may not know how to verbally communicate or understand that they are having a reaction. Some nonverbal cues of an allergic reaction include:

- Putting their hands in their mouths
- Pulling or scratching at their tongues
- Slurring their words
- Their voices may change (e.g., become hoarse or squeaky)

SHOW SLIDE: *Anaphylaxis*

SAY: The American Academy of Allergy Asthma and Immunology explains that anaphylaxis is a severe, possibly life-threatening allergic reaction known to be caused by food, insect venom, medications, and latex. Anaphylaxis onset is rapid and may cause death. It may disrupt breathing and blood circulation. An anaphylactic reaction usually occurs within minutes of being exposed to an allergen, but in some rare instances, it can occur a couple of hours later. Symptoms of anaphylaxis include:

- Difficulty breathing, constriction of airways, tightness of the throat, hoarse voice
- Drop in blood pressure (e.g., pale, weak pulse, confusion, dizziness, fainting, weakness, loss of consciousness)
- Feeling of doom
- Gastrointestinal symptoms (e.g., abdominal pain, nausea, vomiting, diarrhea, cramping)
- Rapid pulse, cardiac arrest
- Shock (i.e., drop in blood pressure and narrowing of airways)
- Skin symptoms (e.g., hives, swelling)
- Swollen lips

SHOW SLIDE: *Epinephrine*

SAY: The treatment for anaphylaxis is to administer a medication called epinephrine, which is also known as adrenaline. An epinephrine auto-injector is a medical device that gives a person a measured dose (or doses) of epinephrine. Trade names for this device include EpiPen®, Adrenaclick®, and Auvi-Q® (Allerject® in Canada). There are also generic versions available.

DO: Show the trainer epinephrine auto-injectors of various brands. Refer participants to the FARE Food Allergy and Anaphylaxis Emergency Care Plan handout.

Instructor's Note: The **FARE Food Allergy and Anaphylaxis Emergency Care Plan** handout is outside of this manual in the tool kit. The link is in the Preparation Checklist of the Instructor's Manual.

SHOW SLIDE: *FARE Resources*

SAY: The **FARE *Food Allergy and Anaphylaxis Emergency Care Plan*** handout shows how to use different types of epinephrine auto-injectors. This is an epinephrine auto-injector trainer. Note, there are no medicine or needles in these. Each State and/or school district has different policies for who can administer an epinephrine auto-injector and where to store the auto-injector. It is crucial for those designated to administer an epinephrine auto-injector to receive the appropriate training in how to do so. The school nurse can be an excellent resource for information on this training.

SHOW SLIDE: *Food Allergy Management Plan*

Instructor's Note: This slide is animated. Read the priority areas as they appear on the screen.

SAY: Each school should have a food allergy management plan. The CDC's *Voluntary Guidelines for Managing Food Allergies* recommends that each school develop a food allergy management plan with five priority areas.

1. Ensure the daily management of food allergies in individual students.
2. Prepare for food allergy emergencies.
3. Provide professional development on food allergies for staff members.
4. Educate students and families about food allergies.
5. Create and maintain a healthy and safe educational environment.

Throughout these lessons, we will discuss different topics that should be in your school's food allergy management plan and ask you questions about them. If you do not know the answers to some of the questions today, you can go back and discuss them with your director or school nurse or do additional research yourself. Our first set of questions is about food allergy emergencies.

ASK: Before we get started, have any of you had experience with administering epinephrine or seen someone respond to an allergic reaction? If so, would you care to share it with the group?

DO: Allow participants to share stories
.
SAY: Thank you for sharing.

SHOW SLIDE: ***Food Allergy Emergency Activity***

DO: Activity: Food Allergy Emergency

Materials: Food Allergy Emergency worksheet

Time: 15 minutes

Instructions:
1. Participants will fill out the **Food Allergy Emergency** worksheet by sections as the content is covered in the Instructor's Manual.
2. Ask the section questions when instructed by the content.
3. Ask participants to write their answers **Food Allergy Emergency** worksheet for that section. They should answer as it pertains to their school in the "Answers" section. If they do not know the answer, tell them to check "Research."
4. Ask a few volunteers to give their answers after each section.
5. Discuss the next section of the content, which covers information about the questions.
6. Ask the next section of questions and repeat.

SAY: As we go through the next section, I will stop and ask you some questions on handling a food allergy emergency. Please turn in your workbook to the **Food Allergy Emergency** worksheet. In the "Answers" section, write answers based on your school's food allergy management plan. If you do not know the answer, check "Research" to remind yourself to find out the answer when you get back to your school. Let's look at the Emergency Reaction section.

Food Allergy Emergency

Instructions: Answer the questions for your school's food allergy management plan. If you do not know the answer, check "Research" to remind yourself to find out the answer when you get back to your school.

Questions	Answers	Research
Emergency Reaction		
A student has a reaction in the cafeteria, what do you do first? Who do you contact?		
Who can administer epinephrine? Do you need to be trained to administer an auto-injector? Who is trained in your school?		
Epinephrine Auto-Injector		
What is the policy for a student with a known life-threatening food allergy for carrying an auto-injector?		
Is the student's auto-injector in the nurse's office or somewhere else? Is the auto-injector available if the nurse is not in their office?		
What if the student has a first-time allergic reaction and no prescription auto-injector is available? Who do you contact?		
Responding to an Emergency		
Is all staff trained on how to respond to an emergency? Do substitutes know how to respond? Part-time staff? Volunteers?		
Do the phones near you get an outside line to call 911?		
Will local EMS have epinephrine available for use when they arrive?		

SHOW SLIDE: *Emergency Reaction Questions*

ASK:
- A student has a reaction in the cafeteria, what do you do first?
- Who do you contact?
- Who can administer epinephrine?
- Do you need to be trained to administer an auto-injector?
- Who is trained in your school?

DO: Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE: *Response to Reaction*

SAY: In treating anaphylaxis with epinephrine, quick administration is key. A delay can be deadly. A serious food allergic reaction is an EMERGENCY. Call 911 or follow your school's food allergy emergency policy. Do not hesitate when anaphylaxis is suspected. Notify the emergency medical service (EMS) that anaphylaxis is suspected so that they will bring epinephrine. An expert panel held by the CDC revealed that State laws vary and not all EMS providers carry epinephrine.

If the student has an epinephrine auto-injector, administer the epinephrine. Let's look at the Epinephrine Auto-Injector Questions section of the **Food Allergy Emergency** worksheet.

SHOW SLIDE: *Auto-Injector Questions*

ASK: For your school:
- What is the policy for a student who has a known life-threatening food allergy carrying an auto-injector?
- Is the student's auto-injector in the nurse's office?
- Is the auto-injector available if the nurse is not in their office?
- What if the student has a first-time allergic reaction and no prescription auto-injector is available?
- Who do you contact?

DO: Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE: *Epinephrine Auto-Injector*

SAY: Know where epinephrine is available in your school. Typically, an auto-injector is only available by prescription for a particular person. Many states have written legislation to allow 'stock' auto-injectors to be available in a school if needed. The medicine is intended to slow or reverse the allergic reaction symptoms, but students who receive an auto-injector will need follow-up care and observation. After epinephrine is used, call 911. Symptoms can improve or disappear, but a person may have a second reaction that could be worse than the first. Up to 20% of people with food allergies have had a second reaction. The student will need to be transported to the hospital in an emergency vehicle to be monitored and receive further treatment if needed. Contact the student's parents/guardians as soon as possible.

There are many questions about training staff about allergies, which we will now discuss. Let's look at the final set of questions, Responding to an Emergency, on the **Food Allergy Emergency** worksheet.

SHOW SLIDE: *Responding to an Emergency*

ASK:
- Is all staff trained on how to respond to an emergency?
- Do substitutes know how to respond? Part-time staff? Volunteers?
- Do the phones near you make an outside line to call 911?
- Will local EMS have epinephrine available for use when they arrive?

DO: Do give participants a few minutes to write their responses. Ask a few volunteers to give their answers.

SHOW SLIDE: *Preparation Is the Key to Success*

SAY: These questions emphasize the need to be prepared. Ask and answer these questions before anyone has an allergic reaction in your school.
- Be prepared to recognize the symptoms of an allergic reaction. Know who is authorized to administer medication and where it is stored.
- Be prepared to react in case of an allergic reaction emergency. Remember, quick administration of epinephrine is key. A delay can be deadly. Call 911 when a severe reaction is suspected.
- After an emergency, review what went smoothly and what needs improvement with those involved so you are better prepared for next time.

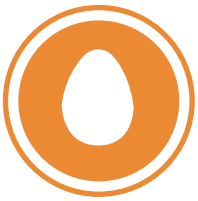
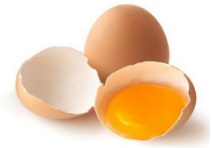
Objective: Identify the nine major food allergens.

SHOW SLIDE: *The Nine Major Food Allergens*

SAY: Please turn in your workbook to the **Nine Major Allergens** handout. Nine food allergens account for 90% of all food allergic reactions in the United States:
1. Crustacean shellfish (e.g., shrimp, lobster, and crab)
2. Eggs
3. Fish
4. Milk
5. Peanuts
6. Sesame
7. Soy
8. Tree nuts (e.g., walnuts, almonds, cashews, pistachios, and pecans)
9. Wheat

Be aware that oysters, mussels, and clams do not fall under crustacean shellfish, as they are in the mollusk family of shellfish. Consideration must be taken with allergies related to them, as they are not listed as one of the nine major allergens.

Nine Major Allergens

MILK	EGGS
 	 
WHEAT	**PEANUTS**
 	 
TREE NUTS (e.g., walnuts, almonds, cashews, pistachios, and pecans)	**SOY**
 	 
FISH	**CRUSTACEAN SHELLFISH** (e.g., crab, lobster, and shrimp)
 	 
SESAME	
 	

Sources:
U.S. Food and Drug Administration. (2022, March 7). *Food allergen labeling and consumer protection act of 2004* (FALCPA). https://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106187.htm
U.S. Library of Congress. (2021, April 23). *Summary: S.578 — FASTER Act of 2021*. https://www.congress.gov/bill/117th-congress/senate-bill/578?q=%7B%22search%22%3A%5B%22S.+578%22%5D%7D&s=1&r=1

SHOW SLIDE: ***Only Way to Prevent an Allergic Reaction***

DO: Pass out the **FARE Tips for Avoiding Your Allergen** handout.

Instructor's Note: The **Tips for Avoiding Your Allergen** handout is outside of this manual in the tool kit. The link is in the Preparation Checklist of the Instructor's Manual.

SAY: The **FARE Tips for Avoiding Your Allergen** handout shows common foods that contain the major allergens.

ASK: What are some food items on this handout that may contain one of the nine major allergens that you did not expect?

FEEDBACK:
- Milk – meatballs
- Eggs – mayonnaise
- Wheat – taco seasoning
- Peanuts – enchilada sauce
- Tree nuts – cereals
- Soy – hamburger
- Fish – Worcestershire sauce
- Sesame – hummus
- Shellfish – fish sticks (cross-contact)

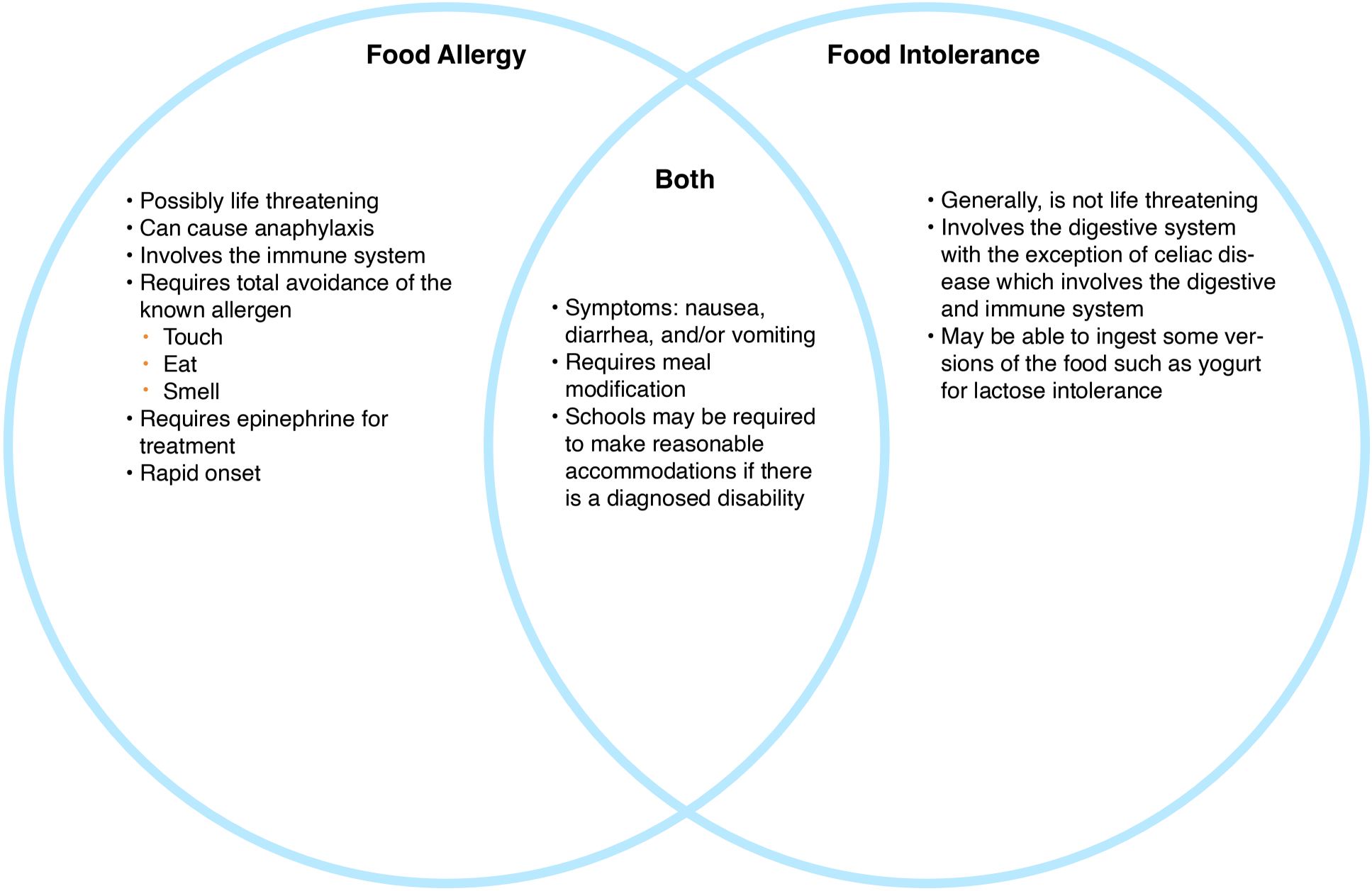
SAY: There is no cure for food allergies. Total avoidance of a food allergen is the only way to prevent an allergic reaction.

Objective: Distinguish between food allergy and food intolerance.

SHOW SLIDE: ***What Is a Food Intolerance?***

SAY: Please turn to the **Food Allergies and Food Intolerances** handout in your workbook. This handout shows us the differences and similarities between food allergies and food intolerances that we are about to discuss.

Food Allergies and Food Intolerances



SAY: A food intolerance is a physiological response that often starts in the digestive system. Reactions to food intolerances may affect the skin, respiratory tract, digestive system, or a combination. A reaction to a food intolerance can be similar to and is often confused with a food allergic reaction. This confusion is because they may have similar symptoms, such as nausea, diarrhea, and vomiting. Students with food intolerances may have a delayed onset of symptoms, unlike food allergies, which can have a rapid reaction.

Food intolerances do not cause immediate life-threatening reactions; however, food intolerances may still be considered a disability. Disability is determined by a State licensed healthcare professional, such as a general practice physician, registered nurse, or allergist, in consultation with the patient. Eliminating the food will eliminate the symptoms.

Common food intolerances that you might hear about are gluten, monosodium glutamate (MSG), and lactose (milk intolerance). Some students may be able to ingest some food related to their food intolerance, such as yogurt for milk intolerance. Those with a milk allergy could not consume any milk products.

ASK: What food intolerances are you dealing with in your school?

DO: Allow time for participants to respond.

SHOW SLIDE: *Celiac Disease*

SAY: The Celiac Disease Foundation explains that celiac disease is unique; it is an inherited, or genetic, autoimmune disorder characterized by sensitivity to gluten. Gluten is a protein found in wheat, barley, and rye. Although they do not naturally contain gluten, oats can sometimes be unsafe due to cross-contact or cross-pollination.

The immune system of a person with celiac disease incorrectly perceives gluten as harmful and, as a result, damages tissues of the small intestine when this protein is eaten. This immune response differs from an immunoglobulin E (IgE) mediated response that causes food allergies.

Symptoms of celiac disease are not generally life-threatening but can have long-term negative effects on health. Many of the nutrients found in food are absorbed in the small intestine. A damaged small intestine may be unable to absorb these nutrients properly. This malabsorption may cause various unpleasant gastrointestinal symptoms, such as diarrhea and abdominal pain, as well as medical conditions, such as bone disease and anemia.

There is no cure, so a strict gluten-free diet is followed to manage the symptoms and promote intestinal health. Celiac disease is always considered a disability under the *Americans with Disabilities Act* (ADA) and must be accommodated. A note from a State licensed healthcare professional is still required to make meal modifications outside of the school meal pattern.

SHOW SLIDE: *Gluten-Free Meals*

ASK: Do you purchase and serve gluten-free products in your cafeteria?

DO: Allow time for participants to respond.

SAY: Gluten-free products, useful in managing celiac disease, are becoming more readily available. Careful label reading is needed to ensure "Gluten-Free" products are purchased. Do not be confused by other terms used on labels: "Wheat-Free" does not mean "Gluten-Free," as gluten is in food products other than wheat. We will discuss more about reading labels in the next lesson.

You can also turn up your creativity with menu planning and find naturally gluten-free foods, such as rice. Naturally, gluten-free foods can also fit into the school meal pattern and may be more affordable than commercial gluten-free products.

DO: Refer participants to the *School Nutrition Food Allergy Fact Sheets* folder.

SAY: ICN provides the *School Nutrition Food Allergy Fact Sheets* folder for free. The food allergy fact sheets for schools are also available free on the ICN website (www.theicn.org/foodsafety). There is a fact sheet for each of the nine major allergens. Each fact sheet provides common food sources and possible substitutes for them.

SHOW SLIDE: *Lesson 1 Review*

SAY: We finished the first lesson, All About Food Allergies. We have covered how to:

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

ASK: What questions do you have before we proceed?

Lesson 2: Reading Labels for Allergens

Time	Topic	Activity	Materials
	Introduction to lesson		
Objective: Demonstrate how to find the nine major food allergens in the ingredient statement on the food label.			
25 minutes	• Federal laws for food allergen labeling • Reading food labels for nine major allergens	• Hide and Seek Label Reading • Group discussion of recall	• Reading Ingredient Statements for Food Allergens handout • FARE Tips for Avoiding Your Allergen handout • Hide and Seek Label Reading worksheet • Hide and Seek Label Reading Answers handout • Ingredient statement printouts • Painter's tape
Objective: Describe how to find allergens in the ingredient statement on the food label that are not among the nine major, are in bulk items, or are in USDA Foods.			
10 minutes	Reading food labels for allergens other than the major nine, including bulk and USDA Foods	Group discussion of handout	Tips for Recognizing Food Allergies in Bulk Items and USDA Foods handout
Objective: Describe the procedures for reading ingredient statements.			
35 minutes	Managing food labels	• Reading Food Labels • Label Reading Role-Play	• Reading Food Labels worksheet • Tips for Managing Food Labels handout • Label Reading Role-Play Cards • Chart Paper • Markers
70 minutes (1 hour, 10 minutes)			

Lesson 2: Reading Food Labels for Allergens

SHOW SLIDE: *Lesson 2: Reading Food Labels for Allergens*

SAY: We will begin Lesson 2: Reading Food Labels for Allergens. During this lesson, our objectives are to discuss how to read food labels for the major nine allergens, read food labels for allergens other than the major nine, including bulk and USDA Foods, and manage food labels. First, we will discuss some Federal laws regarding how allergens are written on a food label.

Objective: Demonstrate how to find the nine major food allergens in the ingredient statement on the food label.

SHOW SLIDE: *Reading Ingredient Statements*

SAY: Make food choices for students with food allergies after carefully reading the food label. Check every label, every time. Manufacturers are required to list the nine major food allergens on the label.

SHOW SLIDE: *Food Allergen Labeling and Consumer Protection Act of 2004 (FALCPA)*

SAY: Please turn in your workbook to the **Reading Ingredient Statements for Food Allergens** handout. This handout provides information about how to find the major food allergens in an ingredient statement.

Reading Ingredient Statements for Food Allergens

Food Allergen Labeling

Although there are over 170 foods that can cause food allergies, nine major food allergens account for 90% of all food-allergic reactions in the United States.

The *Food Allergen Labeling and Consumer Protection Act of 2004* (FALCPA) is a Federal law that became effective in January 2006. It mandates that manufacturers identify any of the eight major food allergens in plain language on the food label.

In 2021, the *Food Allergy Safety, Treatment, Education, and Research Act* (FASTER) was passed into law. This law added sesame to the list of major allergens in the U.S. This law took effect in January 2023 and required food manufacturers to list sesame in the ingredient statement like the other major allergens.

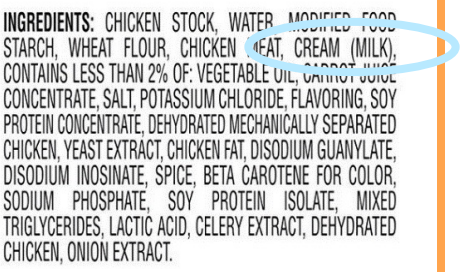
Nine Major Allergens		
Crustacean shellfish*	Milk	Soy
Egg	Peanuts	Tree nuts
Fish	Sesame	Wheat

*Mollusk shellfish are not considered a major allergen by FALCPA, so all the ingredient information for mollusks may not be on the label.

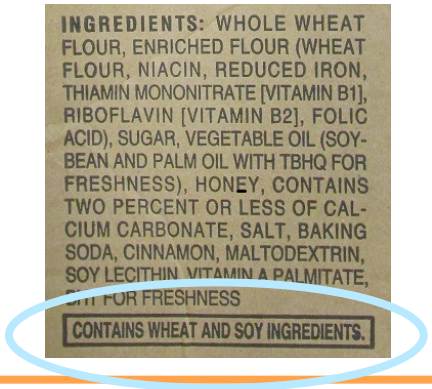
FALCPA specifies where and how allergen information is presented in the ingredient list on the food label. The food ingredient MUST be written in one of three ways.

1. Written as the **common or usual name** of the major food allergen
   - Example: "wheat flour"

2. **In parenthesis,** following the ingredient that is not the common name
   - Example: "cream (milk)"



3. Listed after the ingredient statement in a **"Contains" statement**
   - Example: "Contains: wheat and soy"

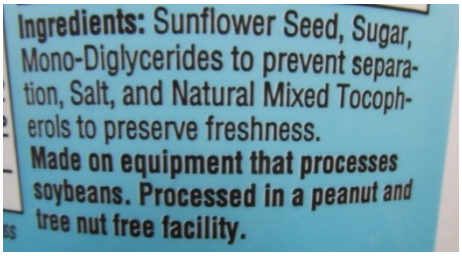


Advisory Statements

Advisory statements are NOT covered in the *Food Allergen Labeling and Consumer Protection Act*, so the wording varies widely from manufacturer to manufacturer. Some common types of advisory statements are the "May Contain," "Made on Equipment," and "Processed in Facilities" statements. According to the Food Allergy Research & Education (FARE) organization, products labeled with an advisory statement are unsafe for people with known food allergies.

"May Contain"
- 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 process 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. Carefully check all labels every time. Do not rely on specifications, fact sheets, or the last shipment. Read the label each time the product is received. Contact the food manufacturer if you have any questions or are uncertain about the food item.

Holding Labels

The Centers for Disease Control and Prevention (CDC) recommends keeping all food labels of all served food products 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 on the day of service. If the food will be served as leftovers or reused in another recipe, keep the label until all product is either consumed or disposed of. Some ideas for managing food labels include keeping a label library, keeping the actual label, and scanning or taking a picture of the label.

Sources:

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U.S. Library of Congress. (2021, April 23). Summary: S.578 — FASTER Act of 2021. https://www.congress.gov/bill/117th-congress/senate-

SAY: The *Food Allergen Labeling and Consumer Protection Act of 2004* (FALCPA) is a Federal law that became effective in January 2006. It mandates that manufacturers identify the eight major food allergens in plain language on the food label. There are specifics on where and how the information is to be presented. The food ingredient MUST be:

1. Written as the **common or usual name** of the major food allergen
    - Example: "wheat flour"
2. **In parenthesis** following the ingredient that is not the common name
    - Example: "albumin (egg)"
3. Listed after the ingredient statement in a **"Contains" statement**
    - Example: "Contains: milk and wheat"

SHOW SLIDE: *Food Allergy Safety, Treatment, Education, and Research Act (FASTER)*

SAY: In 2021, the *Food Allergy Safety, Treatment, Education, and Research Act* (FASTER) was passed into law. This act adds sesame as the ninth major allergen in the United States. Food manufacturers are required to list sesame in the ingredient statement just like the other major allergens. This law went into effect on January 1, 2023.

SHOW SLIDE: *Label Samples*

SAY: These slides show the different labeling methods: a "Contains" statement, using the common or usual name, and using parenthesis.

Instructor's Note: This slide is animated. Please read the label types and examples as they appear on the screen.

SHOW SLIDE: *Advisory Statements*

SAY: Advisory statements are NOT covered in the *Food Allergen Labeling and Consumer Protection Act*, so the wording varies widely from manufacturer to manufacturer.
Some common types of advisory statements are the "May Contain," "Made on Equipment," and "Processed in Facilities" statements. Examples of these statements could say:

- "Product may contain traces of tree nuts."
- "Made on equipment that is also used for products containing eggs and milk."
- "Processed in facilities that also process peanuts."

According to FARE, products labeled with an advisory statement are unsafe for people with known food allergies. Therefore, they should not be served to a student with an allergy listed in an advisory statement. Read the labels carefully when creating your menus and preparing food.

SHOW SLIDE: *Other Food Labels*

SAY: You may see other terms on food labels, such as "gluten-free" or "egg-free." Some of these terms may not be regulated by the Food and Drug Administration (FDA). When looking for food allergies on a food label, it is essential to read the ingredient list and look for the language required by FALCPA.

The term "gluten-free" is regulated by the FDA. However, when checking the ingredient list for a student with a wheat allergy, staff should check the label for "wheat," not "gluten," as other parts of the wheat plant could be used in the food. "Gluten-free" is not the same thing as "wheat-free." Gluten is a protein that can be found in other grains, such as barley and rye.

Terms on the label such as "dairy-free," "peanut-free," or "egg-free" are not regulated by the FDA and are not covered in FALCPA. These items could still contain the allergen through cross-contact—the accidental transfer of allergens to an allergen-free food or surface. Contact the food manufacturer to ensure whether or not the allergen could be present in the food.

SHOW SLIDE: *Hide and Seek Label Reading Activity*

DO: Activity: Hide and Seek Label Reading

Materials: FARE Tips for Avoiding Your Allergen handout, **Hide and Seek Label Reading** worksheet, **Hide and Seek Label Reading Answers** handout, Ingredient statement printouts, painter's tape

Time: 5–8 minutes of group work, 10 minutes of class discussion

Instructions:
1. Divide participants into six groups.
2. Assign each group one of the labels on the wall.
3. Have participants turn to the **Hide and Seek Label Reading** worksheet in their Participant's Workbook.
4. Give the groups 5 minutes to read the ingredient statement and determine the answer to the questions for that label on the worksheet. Participants can use the **FARE Tips for Avoiding Your Allergen** handout for help.
5. After 5 minutes, have each group read the answers for their label. Answers are available on the **Hide and Seek Label Reading Answers** handout.
6. Have groups return to their seats and share observations about reading labels.

SAY: Please retrieve the **FARE Tips for Avoiding Your Allergen** handout and turn in your workbook to the **Hide and Seek Label Reading** worksheet. Six labels have been placed on the walls. I will divide you into six groups, and each group will be assigned one label. You will have 5 minutes to read the ingredient statements and answer the questions corresponding to your label on the **Hide and Seek Label Reading** worksheet. Use the **FARE Tips for Avoiding Your Allergen** handout that has been provided for you for assistance.

DO: Divide participants into six groups. Allow 5 minutes for participants to complete the activity and 10 minutes to report to the class.

Hide and Seek Label Reading Answers

Instructions: Read the assigned 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. Discuss the answers and your observations on label reading within your group. We will also discuss the answers as a class.

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).
CONTAINS: MILK

QUESTIONS FOR LABEL B	Answers
Which ingredients in the statement cause the manufacturer to label the product: CONTAINS MILK?	**Buttermilk***
Can a student known to have a wheat allergy have this product?	**Yes**

*Calcium stearoyl lactylate does not contain milk protein and is safe for those with milk allergies to consume. This shows the importance of looking up unknown ingredients.

Label B

INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEAROYL LACTYLATE, PARTIALLY HYDROGENATED CANOLA OIL, BUTTERMILK PRODUCT, TURMERIC (COLOR).
CONTAINS: MILK

QUESTIONS FOR LABEL C	Answers
Would you prepare and serve this product to a student with an egg allergy?	**No, there is a risk of cross-contact with eggs.**
Does this statement meet the requirements of the labeling law for wheat?	**No, durum and semolina are types of wheat, but the label only says flour. The wheat allergen should be declared in a "Contains" statement, in parenthesis, or by the usual name.**

Label C

Ingredients: Durum flour & semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid.
Allergy Information: has flour 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 student 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 student with known egg, wheat, and soy allergies?	**No, there is a risk of cross-contact with soy.**

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 nine (9) major allergens are in this product? List the allergens.	**5: soy, milk, fish, sesame, wheat**
Can this product be served to a student with shellfish allergies?	**Yes**

Label E

INGREDIENTS: WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, SESAME SEEDS, 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 not in the "Contains" statement?	**Tofu, which is soy**
Would the missing information in the "Contains" statement be enough for the product to be recalled?	**Yes, it is one of the major nine and is required to be declared.**

Label F

BEEF, WATER, TEXTURED TOFU, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY

CONTAINS: EGGS, MILK, AND WHEAT

ASK: What are some of your observations about reading labels for allergens?

FEEDBACK:

- The font on labels can be different.
- Some manufacturers use all caps, and others do not.
- You have to read the label carefully.

SHOW SLIDE: *Recall Notifications*

SAY: Unfortunately, sometimes food may be sold with undeclared allergens. Recalls can be issued for food labels that do not declare one of the major allergens in a food product. According to a 2020 article in *Food Safety Magazine*, almost 52% of recalls in 2019 were due to undeclared allergens. Food recalls due to undeclared allergens were higher than any other type of recall.

SHOW SLIDE: *Recall Procedures*

SAY: Food recalls are an important part of safety for food allergies. Coordinate with your staff about how food recall information is received. If you have a product being recalled, follow your school district's policies on handling recalls. It is essential to have a Standard Operating Procedure (SOP) in place to help with recalls. A Standard Operating Procedure is a set of step-by-step instructions to help school nutrition employees follow the school's food safety processes. The Institute of Child Nutrition has the *Serving Safe Food to Students With Food Allergies* and *Handling a Food Recall* sample Standard Operating Procedures available on their website that you can download free and customize to your school. Samples of these SOPs can be found in your Participant's Workbook.

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 the 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 food.
   - Wear single-use gloves.
   - Use a clean apron when preparing allergen-free food.
   - Wash, rinse, and sanitize all cookware before and after each use.
   - Wash, rinse, and sanitize food contact surfaces.
   - 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 allergen-free items separately.
   - Use a clean, sanitized cutting board when preparing food.
   - Use clean potholders and oven mitts for allergen-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 allergen-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.

Serving Safe Food to Students With Food Allergies, continued

(Sample SOP)

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. Refrain from serving 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 emergency action plan immediately if a student with the potential for anaphylaxis consumes a food allergen.

VERIFICATION AND RECORD KEEPING:

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

DATE IMPLEMENTED: _____ **BY:** _____

DATE REVIEWED: _____ **BY:** _____

DATE REVISED: _____ **BY:** _____

Adapted from: Institute of Child Nutrition. (2016). *Serving safe food to students with food allergies*. University, MS: Author.

Handling a Food Recall

(Sample SOP)

PURPOSE: To prevent foodborne illness in the event of a product recall.

SCOPE: This procedure applies to school nutrition employees who prepare or serve food.

KEY WORDS: Food Recalls

INSTRUCTIONS:

1. Train school nutrition employees on using the procedures in this SOP.
2. Follow State or local health department requirements.
3. Review the food recall notice and specific instructions identified in the notice.
4. Communicate the food recall notice to feeding sites.
5. Hold the recalled product using the following steps:
   - Physically separate the product, including any open containers, leftover product, and food items in current production that contain the recalled product.
   - If an item is suspected of containing the recalled product, but label information is unavailable, follow the district's procedure for disposal.
6. Mark recalled products "Do Not Use" and "Do Not Discard." Inform the entire staff not to use the product.
7. Do not destroy any USDA Foods without official written notification from the State Distributing Agency, USDA Food Safety Inspection Services (FSIS), or State or local health department.
8. Inform the school district's public relations coordinator of the recalled product.
9. Identify and record whether any of the product was received in the district, locate the food recall product by feeding site, and verify that the food items bear the product identification code(s) and production date(s) listed in the recall notice.
10. Obtain accurate inventory counts of the recalled products from every feeding site, including the amount in inventory and the amount used.
11. Account for all recalled products by verifying inventory counts against records of food received at the feeding site.

MONITORING:

School nutrition employees and the school nutrition manager will visually observe that school sites have segregated and secured all recalled products.

Handling a Food Recall, continued

(Sample SOP)

CORRECTIVE ACTION:

1. Retrain any school nutrition employee found not following the procedures in this SOP.

2. Determine if the recalled product is to be returned and to whom, or destroyed and by whom.

3. Notify feeding site staff of procedures, dates, and other specific directions to be followed for collecting or destroying the recalled product.

4. Consolidate the recalled product as quickly as possible, but no later than 30 days after the recall notification.

5. Conform to the recall notice using the following steps:
   a. Report quantity and site where the product is located to the manufacturer, distributor, or State agency for collection. The quantity and location of the affected USDA Foods must be submitted to the State Distributing Agency within 10 calendar days of the recall.
   b. Obtain the necessary documents from the State Distributing Agency for USDA Foods. Submit necessary documentation for reimbursement of food costs.
   c. Complete and maintain all required documentation related to the recall, including:
      - Recall notice
      - Records of how food product was returned or destroyed
      - Reimbursable costs
      - Public notice and media communications
      - Correspondence to and from the public health department and State agency

VERIFICATION AND RECORD KEEPING

School nutrition employees will record the name of the contaminated food, date, time, and the reason why the food was discarded on the Damaged or Discarded Product Log. The school nutrition manager will verify that appropriate corrective actions are being taken by reviewing, initialing, and dating the Damaged or Discarded Product Log each day. Maintain the Damaged or Discarded Product Logs for a minimum of 1 year.

DATE IMPLEMENTED: _____ **BY:** _____

DATE REVIEWED: _____ **BY:** _____

DATE REVISED: _____ **BY:** _____

Adapted from: Institute of Child Nutrition. (2016). *Responding to a food recall*. University, MS: Author.

ASK:
- What SOP do you have in place to handle a recall?
- Do you have a quarantine procedure in place for recalled products?

FEEDBACK:
- Checking inventory for the recalled product
- Checking with the director to see if you received the recalled product
- Putting the recalled product in a specific place in their respective areas—dry storage, fridge, or freezer—and marking as DO NOT USE – RECALLED PRODUCT

Objective: Describe how to find allergens in the ingredient statement on the food label that are not among the nine major, are in bulk items, or are in USDA Foods.

SHOW SLIDE: *Reading Labels for Other Allergens*

SAY: We will now discuss allergens that are not among the nine major, when they are in bulk items, and when they are in USDA Foods. We know from earlier information presented in today's training that nine foods account for 90% of food allergic reactions; that means other foods cause 10%. According to the CDC, more than 170 foods can cause an allergic reaction.

DO: Refer back to the Warm-Up Activity chart paper and discuss any allergens in the "Other Allergen" category.

ASK: What other allergens are your students allergic to that are not one of the major nine?

FEEDBACK: Strawberries, mustard, sulfites

SAY: Finding these allergens may be more difficult because there is no specific regulation about labeling them. You will need to check the entire ingredient statement for any allergen that is not one of the nine major allergens. Work with the school nurse and parents to be familiar with different ways a food may be listed in an ingredient statement. Always discuss any questions about reading labels for food allergies that are not among the major nine with your coworkers. Some ingredients, such as cinnamon or mustard, may not be listed on the ingredient statement. Different spices or herbs may be listed as just "spices" in the ingredient statement. If you have a student with food allergies to a spice, it is important to talk to the manufacturer to determine what spices are included in a food product. Contacting the food manufacturer to confirm the allergen is not in a product may be necessary.

SHOW SLIDE: *Recognizing Allergens in Bulk Items*

SAY: Bulk items are large quantities of single food items such as flour, rice, or sugar. Please turn in your Participant's Workbook to the **Tips for Recognizing Food Allergies in Bulk Items and USDA Foods** handout. We are going to discuss some strategies for determining allergens in these items.

Tips for Recognizing Food Allergies in Bulk Items and USDA Foods

- Obtain the ingredient statement for the bulk product and identify known allergens; retain the labeling on bulk packages.
- Use your Standard Operating Procedure for how bulk products will be handled.
  - Determine the number of bulk lots mixed in one storage container.
  - Ensure that the food product added has the same ingredient statement.
  - Prevent cross-contact from utensils and scoops. (For example, do not use the flour scoop to scoop sugar.)
  - Clean the bulk storage container thoroughly to remove allergen residue before using the container for a different product.
- If there is any doubt about the bulk product ingredients, contact the manufacturer.
- **Always** read USDA Foods product labels for allergens; product brands may change throughout the school year. Do not rely on USDA Foods Fact Sheets.
- Build time in the work schedule to read food labels.

Source:

Institute of Child Nutrition. (2017). *Food safety fact sheets: Cleaning and sanitizing food contact surfaces*. www.theicn.org/foodsafety

SAY: With bulk foods, there are some allergen risks. The following steps can help to prevent hazards.

- Obtain the ingredient statement for the bulk product, and identify any known allergens; retain the labeling on bulk packages.
- Use your Standard Operating Procedure for how bulk products will be handled.
  - Determine the number of bulk lots mixed in one storage container.
  - Ensure that the food product added has the same ingredient statement.
  - Prevent cross-contact from utensils and scoops. (For example, do not use the flour scoop to scoop sugar.)
  - Clean the bulk storage container thoroughly to remove allergen residue before the container is used for a different product.
- If there is any doubt about the ingredients of bulk products, contact the manufacturer.

Cross-contact, which we will discuss further in the next lesson, is the accidental transfer of an allergen to an allergen-free food or surface. Someone using the flour scoop to scoop out corn meal is an example of cross-contact.

ASK: What are some best practices for handling bulk products to eliminate risks for students with allergies?

DO: Allow time for participants to share some of their best practices.

SAY: Thank you for sharing this information with the group.

SHOW SLIDE: *Food Allergens in USDA Foods*

ASK: How do you handle USDA Foods regarding food allergens?

FEEDBACK: Obtain and read labels for known allergens, prevent cross-contact, and keep labels for 24 hours

SAY: USDA Foods should be addressed similarly to other institutional-size commercial products as they have the same labeling requirements. USDA Foods and other supplier brands may change throughout the school year, so label reading is vital. When determining if a product is allergen-free, use the actual label and read the ingredient statement. Schools can now use the new USDA Foods Database to check for allergens. It can be found at https://www.fns.usda.gov/usda-fis/usda-foods-database. It provides up-to-date, vendor-specific nutrition, allergen, and ingredient information for direct delivered USDA Foods for child nutrition programs. The database must be downloaded to use it. After selecting a food category and material code, the allergen information for the major nine allergens for the different food products will be displayed by the vendor. If a product contains one of the major nine allergens, it will say "Contains" in the row of the sheet. Always check the date at the bottom of the sheet to see when the food product information was last updated. The database is updated regularly and must be re-downloaded to get the new content. Read the instructions on the website landing page for how to use the database. Do not rely on USDA Foods Fact Sheets' current food allergy information.

ASK: Are there any questions?

Objective: Describe the procedures for reading ingredient statements.

SHOW SLIDE: *Procedures for Reading Food Labels*

SAY: Recognizing food allergens demands time, attention, and rigorous procedures. Make sure your employees have time to read labels. Build time into their daily or weekly schedule. As a best practice, write 'reminder' instructions on production sheets for allergen-free recipes such as:

- Read the ingredient statements of all packages to verify there are no allergens.
- Save or copy/scan package labels to include the ingredient list, allergen statements, and lot and run coding.

SHOW SLIDE: *Reading Food Labels Activity*

SAY: We will further discuss strategies for reading labels and ingredient lists. As we talked about in Lesson 1, this should be in your school's food allergy management plan. We will go through a series of questions about the process and procedures for reading labels.

DO: Activity: Reading Food Labels

Materials: Reading Food Labels worksheet

Time: 15 minutes

Instructions:

1. Ask questions as prompted by the following script. Questions are asked in four sections.
2. Ask participants to follow along and answer questions on the **Reading Food Labels** worksheet as prompted. Participants should write their answers as it pertains to their school in the "Answers" section. If they do not know the answer, they should check "Research."

SAY: Please turn in your workbook to the **Reading Food Labels** worksheet. Like before, with the food allergy emergency questions, we will discuss this content in sections. Write your answers in the "Answers" section, and if you do not know the answer, check "Research" to remind yourself to find the answer when you return to school.

Reading Food Labels

Instructions: Answer the questions for your school's food allergy management plan. If you do not know the answer, check "Research" to remind yourself to find out the answer when you get back to your school.

Questions	Answers	Research
Procedures for Reading Food Labels		
Who reads labels for food allergens?		
If that person is out, who takes on that responsibility?		
Could substitutes read the labels?		
How often do you read labels for allergens?		
Storing Food Labels		
Do you keep food labels?		
How long?		
What do you do if you cannot find the food label?		
How do you find ingredient information for food items where the labels are printed on the case, which is thrown away after stocking the shelves?		
Where are food labels stored?		
Procedures for Changes in Food Labels		
What would you do if a substitute product contains a food allergen, the product recipe has changed to contain an allergen, or the product now has an advisory statement.		
What is your chain of command for communicating that a food label now contains a food allergen?		
Who do you tell if you realize that you made a mistake reading a food label and it actually does contain a food allergen?		
Communicating Food Allergy Information		
How does your school district share food allergy information about menu items?		
How do you communicate with a parent or guardian requesting additional food allergy information?		
How do you communicate with other school employees, such as the school nurse, principal, or teacher, requesting additional food allergy information?		
If you cannot answer the question, who do you tell that person to contact?		

SHOW SLIDE: *Procedures for Reading Food Labels*

ASK:

- Who reads labels for food allergens? If that person is out, who takes on that responsibility? Could substitutes read the labels?
- How often do you read labels for allergens?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: *Reading Food Labels*

SAY: Labels should be read when the product is received. Since this is time-consuming, build time into the schedule for this procedure. Because suppliers may make product substitutions, formulas may change, or vendors could change, check all labels carefully every time. You cannot rely on specifications, fact sheets, or the last shipment. Read the label each time the product is received.

SHOW SLIDE: *Storing Food Labels*

ASK:

- Do you keep food labels? How long?
- What do you do if you cannot find the food label?
- How do you find ingredient information for food items where the labels are printed on the case, which is thrown away after stocking the shelves?
- Where are food labels stored?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: *Food Label Storage*

SAY: The CDC recommends keeping all labels for served food products 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 on the day of service. If food will be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed of. Keeping a label library is a common practice. Some schools keep the actual label, scan the label, or take a picture with a cell phone.

SHOW SLIDE: *Procedures for Changes in Food Labels*

SAY: Letting others know if you see a new allergen on a food label is very important. You may need to tell the director, school nurse, teacher, or students. We will now discuss how an employee would communicate this information.

ASK:

- What would you do if a substitute product contains a food allergen, the product recipe has changed to contain an allergen, or now has an advisory statement?
- What is your chain of command for communicating that a food label now contains a food allergen?
- Who do you tell if you realize that you made a mistake reading a food label and it actually does contain a food allergen?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

SHOW SLIDE: *Changes in Food Labels*

SAY: As mentioned earlier, recipes for food products can change. Knowing the chain of command for communicating that a food product now contains a food allergen can prevent an allergic reaction. Every school district should clearly outline the chain of command in their food allergy management plan and communicate this to all employees. The food allergy management plan should also cover actions employees should take if a food label is misread and contains a food allergen. If this happens, contact the person outlined in the chain of command, and do not serve the food to the student with the allergy.

SHOW SLIDE: *Communicating Food Allergy Information*

SAY: There are times that you need to communicate information about allergens in the food you serve to people outside the kitchen. Some requests may come from the school nurse, parents or guardians, or students.

ASK:

- How does your school district share food allergy information about menu items?
- How do you communicate with a parent or guardian requesting additional food allergy information?
- How do you communicate with other school employees, such as the school nurse, principal, or teacher, requesting additional food allergy information?
- If you cannot answer the question, who do you tell that person to contact?

DO: Give participants 1–3 minutes to write their responses. Have a few participants volunteer to share their answers.

ASK: Would a couple of you share a time that you were asked for allergy label information?

SHOW SLIDE: *Communicating Food Allergies*

SAY: If you are uncertain about any questions being asked, contact the food manufacturer.

Electronic records can help share information on the district's website. Other ways are to prepare handouts or provide training for your staff, parents, or guardians. If you communicate the school's food allergy management plan, families will understand what is being done to protect their children.

- It is an important priority of the school nutrition department.
- Precautions are being taken to keep students safe.
- You have an emergency action plan if something unexpected occurs.

The **Tips for Managing Food Labels** handout in your Participant's Workbook captures the tips we have discussed for reading food labels for allergens.

Tips for Managing Food Labels

Reading Food Labels

- Check all labels carefully every time.
  - Read the label each time the product is received.
    - Suppliers may make product substitutions.
    - Formulas may change.
    - Vendors could change.
  - Read labels before preparing food.
- Build time into the schedule for this procedure.
- Do not rely on specifications, fact sheets, or the last shipment.

Storing Food Labels

- The CDC's *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs* recommends keeping all labels for 24 hours for all food products served.
  - This is a precaution, so the label is available if 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 on the day of service.
- If food will be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed of.
- Methods for maintaining the label:
  - Keep a label library.
  - Keep the actual label in a designated spot for service that day.
  - Scan or photograph the label.

Changes in Food Labels

- Knowing the chain of command for communicating that a food product now contains a food allergen can prevent an allergic reaction.
- Every school district should have a food allergy management plan.
  - Clearly outline the chain of command.
  - Detail what actions employees should take if a food label is misread and contains a food allergen.
    - Contact your director.
    - Do not serve the food to the student with the allergy.
- Train employees on the plan.

Communicating Food Allergies

- Methods for communicating:
  - Electronic records can help share information on the district's website.
  - Prepare handouts.
  - Provide training for your staff, parents, or guardians.
- If you communicate the school's food allergy management plan, families will understand what is being done to protect their children.
  - It is an important priority of the school nutrition department.
  - Precautions are being taken to keep students safe.
  - You have an emergency action plan if something unexpected occurs.

Sources:
Centers for Disease Control and Prevention. (2013). *Voluntary guidelines for managing food allergies in schools and early care and education programs*. www.cdc.gov/healthyyouth/foodallergies/
Food Allergy Research and Education. (n.d.). *How to read food labels*. https://www.foodallergy.org/life-with-food-allergies/living-well-everyday/how-to-read-food-labels
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SHOW SLIDE: *Label Reading Role-Play Activity*

DO: Activity: Label Reading Role-Play

Materials: Label Reading Role-Play Cards (see Appendix)

Time: 5–8 minutes of group work, 15–20 minutes to present the skit to the class

Instructions:
1. Divide participants into four to six groups depending on class size.
2. Assign each group a role-playing scenario.
3. Give the groups 5–8 minutes to discuss the scenario and assign roles. The group will develop a skit to introduce the scenario and show a solution. Not everyone in the group is required to be involved in the skit, but everyone should be involved in the discussion.
   A. A student allergic to peanuts was served a soy butter sandwich. Her very upset parent comes to you because the student did not eat lunch since she thought it was a peanut butter sandwich.
   B. The cook reviewed a food label and noticed a food allergen that was not normally on the label and was not flagged. The food is on the line about to be served.
   C. You pull frozen chicken tenders from the freezer, but no food label is on the bag. All ingredient information was on the box that was recycled.
   D. While reading a food label, you notice that the pasta sauce now contains wheat.
   E. The substitute cook could not find the label for the USDA Foods meatballs, so he used the USDA Foods Fact Sheet.
   F. The person that usually reads the labels is out today, and a substituted product has been delivered.
4. Give each group 3–4 minutes to act out their skit.

SAY: I am going to divide everyone into groups and give you a role-playing scenario. Your group will come up with a short skit to introduce the scenario and show a solution. Not everyone in the group will need to participate in the skit, but everyone should be involved in the discussion. Have fun and be creative!

DO: Allow groups 5 minutes to create their skit. Each group will have 3–4 minutes to present their skit.

SAY: Great job! Everyone came up with some great solutions!

SHOW SLIDE: *Lesson 2 Review*

SAY: We finished our second lesson, Reading Labels for Allergens. We have covered the following:

- Finding the nine major allergens in the ingredient statement on the food label
- Finding allergens in the ingredient statement on the food label that are not among the nine major, are in bulk items, or are in USDA Foods
- Procedures for reading food labels

ASK: What questions do you have before we proceed?

Lesson 3: Avoiding Cross-Contact

Time	Topic	Activity	Materials
	Introduction to lesson		
Objective: Define cross-contact.			
5 minutes	Cross-contact	Cross-Contact or Cross-Contamination?	Slide deck
Objective: Examine how cross-contact may occur in a school nutrition program.			
10 minutes	How cross-contact occurs	• Where are the Allergens?	• Glo Germ® • Two spatulas • Black light • Cleaning and Sanitizing Fact Sheet
Objective: Develop strategies for preventing cross-contact.			
30 minutes	Methods for preventing cross-contact	• Preventing Cross-Contact Plan • Avoiding Cross-Contact Scenarios	• Methods for Avoiding Cross-Contact handout • Preventing Cross-Contact Plan worksheet • Avoiding Cross-Contact Scenario Cards • Avoiding Cross-Contact Scenarios Potential Answers handout
45 minutes			

Lesson 3: Avoiding Cross-Contact

SHOW SLIDE: *Lesson 3: Avoiding Cross-Contact*

SAY: This lesson discusses cross-contact. Our objectives for this lesson are to define cross-contact, examine how cross-contact may occur in school nutrition programs, and develop strategies for preventing it.

We will start this lesson by defining cross-contact and how it differs from cross-contamination.

Objective: Define cross-contact.

SHOW SLIDE: *Cross-Contact / Cross-Contamination*

SAY: Many people confuse cross-contact and cross-contamination. The terms are often used interchangeably; however, they have different meanings.

Cross-contamination occurs when microorganisms are transferred from a food, person, or surface to another food. Cooking **does** reduce or eliminate the chances of a person getting a foodborne illness.

Examples of cross-contamination include:

- Cutting raw meat on a cutting board and then chopping up fresh vegetables for the salad bar on the same cutting board without cleaning, rinsing, and sanitizing it in between
- Not changing gloves and washing hands in between handling raw chicken and fresh fruit.
- Not properly cleaning a container that held raw meat and then putting bread in it

As FDA *Food Code* explains, cross-contact occurs when an allergen is transferred from a food containing an allergen to a food or surface that does not have the allergen. Cooking **does not** reduce or eliminate the allergen protein, so a person with a food allergy can still have a reaction to cooked food.

An example of cross-contact would be using a knife to spread peanut butter and only wiping it clean before using it to spread jelly. If the peanut butter goes into the jelly jar, the jelly cannot be used for a student with a peanut allergy. Peanut protein could remain on the knife and cause an allergic reaction for that student. In addition, if that knife was used to spread peanut butter on wheat bread and then placed back into the peanut butter, that peanut butter cannot be used for a student with a wheat allergy.

All equipment and utensils must be cleaned with hot, soapy water, rinsed, sanitized, and air-dried before preparing allergen-free food. Even a small trace of food, which could be invisible to the naked eye, can cause an allergic reaction. Even food that is burnt onto pans and grills may cause a reaction.

Other examples of cross-contact include:

- The flour used to make bread lands on another surface
- Measuring milk in a liquid measuring cup and then measuring broth in the same measuring cup without cleaning in between
- Spilling food on the serving line into other food while serving it to students

SHOW SLIDE: *Cross-Contact or Cross-Contamination? Activity*

DO: Activity: Cross-Contact or Cross-Contamination?

Materials: Slide deck

Time: 5 minutes of group participation and discussion

Instructions:
1. The slide deck shows a series of four pictures.
2. Participants will decide whether the picture is an example of cross-contact or cross-contamination. To vote for an example, participants will use their arms to create a "U" for cross-contact and an "X" for cross-contamination.
3. The trainer will then lead a brief group discussion on how to fix the scene.

SAY: I am going to show pictures of scenarios. I want you to decide if the scenario shows cross-contact or cross-contamination. Make a "U" shape with your arms to vote for cross-contact. If you believe it is cross-contamination, make an "X."

SHOW SLIDE: *1. Cross-Contact or Cross-Contamination?*

DO: Give participants a chance to vote.

SAY: This is an example of both cross-contamination and cross-contact. As raw meat and fresh vegetables are being chopped on the same cutting board at the same time, cross-contamination from the raw meat occurs. As one of the featured meats is fish, this also shows an example of cross-contact.

ASK: How would you prevent this scenario?

FEEDBACK:
- Prep raw meat and fresh vegetables using separate cutting boards and knives. Color-coded cutting boards designated for certain foods, such as red for red meat, green for produce, and blue for fish, can also be used.
- Wash, rinse, sanitize, and air-dry the knife and cutting board between preparing food items.
- Wash hands and change gloves between foods.

SHOW SLIDE: *2. Cross-Contact or Cross-Contamination?*

DO: Give participants a chance to vote.

SAY: This is an example of cross-contact as the knife used to cut a peanut butter and jelly (PB&J) sandwich was also used to cut a turkey sandwich without cleaning in between. Peanut butter is on the turkey sandwich.

ASK: How would you prevent this scenario?

FEEDBACK:

- Prep the sandwiches on different cutting boards using different knives.
- Wash, rinse, sanitize, and air-dry the knife and cutting board between preparing food items.
- Have separate workers prepare sandwiches so no allergens transfer with the gloves.

SHOW SLIDE: *3. Cross-Contact or Cross-Contamination?*

DO: Give participants a chance to vote.

SAY: This is an example of cross-contamination. The employee is tasting the food with the serving spoon over the pan of food. They are also not wearing a hairnet.

ASK: How would you prevent this scenario?

FEEDBACK:

- Wear a hair restraint to prevent hair from getting into food.
- Use proper tasting techniques, which include placing a small portion of the food in a separate bowl, stepping away from the main dish, and using a different spoon than the one being used to prepare the food to taste it.
- Train employees on proper attire and food-tasting procedures.

SHOW SLIDE: *4. Cross-Contact or Cross-Contamination?*

DO: Give participants a chance to vote.

SAY: This is an example of both cross-contact and cross-contamination. Cross-contact occurs because the flour on the dirty apron allows wheat allergens to transfer. Cross-contamination occurs as the spaghetti sauce and flour on the dirty apron can grow and transfer microorganisms.

ASK: How would you prevent this scenario?

FEEDBACK:

- Train employees on proper attire.
- Have employees change their aprons once they become dirty. Ensure that extra, clean aprons are available for employees to use.

Objective: Examine how cross-contact may occur in a school nutrition program.

SHOW SLIDE: *Potential Sources of Cross-Contact*

SAY: There are several potential sources of cross-contact. The following are some examples.

- The food mixes during handling and preparation.
- Insufficient handwashing allows allergens to remain on hands.
- Insufficient cleaning allows allergens to remain on food contact surfaces such as food preparation tables.
- Shared equipment, utensils, cutting boards, and counters are not properly cleaned between uses.
- Cooking food splatters into an allergen-free food.
- Steam from cooking foods like shellfish and fish gets into an allergen-free food.
- Utensils on salad bars, buffets, and serving stations are used for multiple foods.

ASK: Can you think of any other situations of cross-contact?

DO: Allow participants to respond.

ASK: How do you know if there has been cross-contact in your facility?

FEEDBACK:

- Observe the work practices of employees.
- Store allergen-free foods below those containing allergens.
- When it happens, speak professionally to the employee, and remove the food.

SHOW SLIDE: *Where Are the Allergens? Activity*

SAY: We will now do the activity Where are the Allergens?

DO: Activity: Where Are the Allergens?

Materials: Glo Germ®, two spatulas or other kitchen utensils (one should have Glo Germ® on it), black light, **Cleaning and Sanitizing Fact Sheet**

Time: 2–3 minutes of demonstration

Instructions:

1. There will be two spatulas, one with Glo Germ® and one without. Show them to the participants and ask which spatula has the "allergen" (Glo Germ®) on it.
2. After giving the class a chance to answer, use the black light to show which spatula had the "allergens."
3. Discuss how allergens are not always visible to the naked eye.
4. Have participants review the **Cleaning and Sanitizing Fact Sheet** and reinforce the importance of properly cleaning, rinsing, and sanitizing.

SAY: You see two spatulas in front of you. Please let me know if you can tell which one has allergens on it.

DO: Allow time for participants to guess which utensils have allergens on them. Then, use the black light to show which utensils have allergens.

SHOW SLIDE: *Cleaning and Sanitizing*

SAY: You can see why it is important to be aware of the possibility of cross-contact. Allergens are generally not visible to the naked eye and, therefore, can be accidentally transferred to allergen-free foods easily. Proper cleaning and sanitizing procedures in schools are needed to remove allergens. The **Cleaning and Sanitizing Fact Sheet** provides the steps for properly cleaning and sanitizing all food contact surfaces and equipment. The FDA recommends washing, rinsing, sanitizing, and air-drying surfaces (full cleaning) to remove allergen residue and minimize allergen transfer. In their study, FDA found that pre-scraping food from surfaces before full cleaning helps remove more of an allergen.

Writing SOPs for cleaning, sanitizing, and serving food to students with food allergies is essential. All staff should be trained on SOPs.

Cleaning and Sanitizing Fact Sheet

Introduction
Cleaning and sanitizing is a crucial 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, which 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. Cleaning and sanitizing is an area where many food service 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 the manufacturer's instructions regarding the use and cleaning of equipment.
- Follow the manufacturer's instructions regarding using chemicals for cleaning and sanitizing food contact surfaces.
- Refer to the Safety Data Sheet (SDS) provided by the manufacturer if you have questions about using specific chemicals.
- Wash, rinse, and sanitize food contact surfaces of sinks, tables, 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 food with a food allergen has been prepared and before preparing an allergen-free food
- Wash, rinse, and sanitize food contact surfaces using the following procedures:
  - Wash the surface with a detergent solution to clean it.
  - Rinse the surface with clean water to remove debris and detergent.
  - Sanitize the 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 are properly done.

- 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 into contact with food contact surfaces that have not been cleaned and sanitized correctly.

Remember, follow State or local health department requirements.

Source:
Institute of Child Nutrition. (2017). *Food safety fact sheets: Cleaning and sanitizing food contact surfaces*. www.theicn.org/foodsafety

ASK: What method is used to clean cafeteria tables?

DO: Pause to listen to participant responses.

SAY: Sometimes sanitizing wipes are used, and the tables are only cleaned with a sanitizing solution. These methods will not remove the allergen residue and may increase the risk of exposure to a student with food allergies.

ASK:

- How often are tables washed, rinsed, and sanitized?
- How can the risk of cross-contact be reduced or eliminated?

SAY: Think about your procedures for cleaning and sanitizing. They may need to be updated to reduce the risk of cross-contact.

Next, we will describe some strategies that you may already use and some strategies you have yet to consider when avoiding cross-contact with food allergies.

Objective: Develop strategies for preventing cross-contact.

SHOW SLIDE: *Preventing Cross-Contact*

SAY: Please turn in your Participant's Workbook to the **Methods for Avoiding Cross-Contact** handout. This handout provides tools and tips for how school nutrition professionals can prevent cross-contact throughout the foodservice process. The handout also contains example scenarios of cross-contact and possible solutions for preventing it.

Storing, preparing, and serving food to prevent cross-contact can reduce the risk of exposing a student to a food allergen.

Storage

- Have shelves in the dry storage, refrigerator, and freezer that are only for allergen-free foods. A best practice is to use the top shelf so nothing can fall on the food (e.g., wheat flour falling on brown rice flour).

Preparation

- Follow SOPs for handwashing, cleaning, and sanitizing.
- Wash hands before preparing allergy-free foods.
- Wear single-use gloves.
- Use a clean apron, potholders, and oven mitts when preparing allergy-free foods to prevent cross-contact.
- Wash, rinse, and sanitize all utensils, equipment, and food contact surfaces before and after each use.
- Use color-coded or designated utensils, equipment, etc., that are for specific allergen-free foods if possible.
- Prepare food items that do not contain allergens first.
- Cover, label, and store the allergy-free items separately. Sticker or color-code-wrapped food to make all staff easily aware that the food is allergen-free.
- Designate an allergy-free zone in the kitchen if possible. When working with multiple food allergies, set up procedures to prevent cross-contact within the allergy-free zone.

Serving

- Encourage students to wash their hands before and after each meal.
- Designate an allergen-free cafeteria table. Ensure the seats and countertop are washed, rinsed, and sanitized between lunch services. Also, students with food allergies cannot be forced to eat at this table.
- Take extra care with serving utensils and serving containers to prevent cross-contact. Replace any utensils and food suspected of cross-contact on a self-serve or serving line.

DO: Read a few examples from the **Methods for Avoiding Cross-Contact** handout and ask participants for solutions.

Methods for Avoiding Cross-Contact

Cross-contact occurs when an allergen is accidentally transferred from a food containing an allergen to a food or surface that does not have the allergen.

Example of Cross-Contact
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

Potential Sources of Cross-Contact

- The food mixes during handling and preparation.
- Insufficient handwashing allows allergens to remain on hands.
- Insufficient cleaning allows allergens to remain on food contact surfaces such as food preparation tables.
- Shared equipment, utensils, cutting boards, and counters are not properly cleaned between uses.
- Cooking food splatters into an allergen-free food.
- Steam from cooking foods like shellfish and fish gets into an allergen-free food.
- Utensils on salad bars, buffets, and serving stations are used for multiple foods.

How to Avoid Cross-Contact

Storage

- Have shelves in the dry storage, refrigerator, and freezer that are only for allergen-free foods. A best practice is to use the top shelf so nothing can fall on the food (e.g., wheat flour falling on brown rice flour).

Preparation

- Follow SOPs for handwashing, cleaning, and sanitizing.
- Wash hands before preparing allergy-free foods.
- Wear single-use gloves.
- Use a clean apron, potholders, and oven mitts when preparing allergy-free foods to prevent cross-contact.
- Wash, rinse, and sanitize all utensils, equipment, and food contact surfaces before and after each use.
- Use color-coded or designated utensils, equipment, etc., that are for specific allergen-free foods if possible.
- Prepare food items that do not contain allergens first.
- Cover, label, and store the allergy-free items separately. Sticker or color-code-wrapped food to make all staff aware that the food is allergen-free.
- Designate an allergy-free zone in the kitchen if possible. When working with multiple food allergies, set up procedures to prevent cross-contact within the allergy-free zone.

Serving
- Encourage students to wash their hands before and after each meal.
- Designate an allergen-free cafeteria table. Ensure the seats and countertop are washed, rinsed, and sanitized between lunch services. Also, students with food allergies cannot be forced to eat at this table.
- Take extra care with serving utensils and serving containers to prevent cross-contact. Replace any utensils and food suspected of cross-contact on a self-serve or serving line.

Examples for Avoiding 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.	• Keep a separate jelly jar for the student with allergies. Use a clean spoon to put jelly on the bread. • Put jelly on first using a separate spoon.
You prepare an allergen (e.g., chopping walnuts on a cutting board) and then another food (e.g., slicing tomatoes) without proper cleaning.	• Make allergen-free food first—wash, rinse, sanitize, and air-dry the foodservice equipment, including the cooking area. • Use color-coded cutting boards designated for specific food items.
Ingredients from an allergenic food may splatter, splash, or spill into the allergy-free food when making a catering platter.	Prepare the allergen-free foods first; cover and remove them from the preparation area before preparing other foods.
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.
Allergy-free foods may come in contact with an allergen in storage, such as the refrigerator or dry storage.	Designate a separate shelf in the refrigerator and dry storage area for allergen-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 suspected of cross-contact, or do not use it for a student with allergies.
Kitchens may slice various meats and cheeses on shared equipment. Meats could contain allergenic ingredients such as milk, soy, wheat, or nuts.	• Make sure staff are following Standard Operating Procedures to clean equipment. • Slice allergen-free food first.
Cafeteria lines and buffets may have a greater risk of cross-contact due to shared utensils and spills.	Have the school nutrition manager keep the allergen-free food separate to prevent cross-contact.

Sources:

Food Allergy Research & Education. (2020). *Prevent cross-contact*. https://www.foodallergy.org/resources/cross-contact-poster-set-eng

Institute of Child Nutrition. (2017). *Serving safe food to students with food allergies (Sample SOP)*. www.theicn.org/foodsafety

Institute of Child Nutrition. (2022). *Family child care food allergy fact sheet – Avoiding cross-contact*. www.theicn.org/foodsafety

ASK: Do you have any other potential solutions or prevention ideas?

DO: Allow time for questions and responses.

SAY: Thank you for sharing your ideas. It is our responsibility to provide allergen-safe food to students each and every time.

SHOW SLIDE: *HACCP-Based Food Safety Plan*

SAY: HACCP stands for Hazard Analysis Critical Control Points. It is a detailed food safety plan that looks at your specific facility and addresses possible food safety problems. The goal of a HACCP-based food safety plan is to control, prevent, and minimize food safety risks that may cause illness or injury. A HACCP-based food safety plan contains Standard Operating Procedures (SOPs). A Standard Operating Procedure is a set of step-by-step instructions to help school nutrition employees follow the school's food safety processes. Following SOPs can reduce the risk of a foodborne illness outbreak and allergic reactions. Speak to your director about your district's specific SOPs. ICN provides sample SOPs (www.theicn.org/foodsafety), such as **Cleaning and Sanitizing Food Contact Surfaces** and **Serving Safe Food to Students With Food Allergies**.

We will now do an activity to tie what you have learned back to your school.

SHOW SLIDE: *Preventing Cross-Contact Plan Activity*

DO: Activity: Preventing Cross-Contact Plan

Materials: Preventing Cross-Contact Plan worksheet

Time: 5 minutes of individual work, 5 minutes of reporting out

Instructions:
1. Have participants reflect on what they have learned in Lesson 3.
2. Tell participants to turn to the **Preventing Cross-Contact Plan** worksheet.
3. Give participants 5 minutes to write where cross-contact can occur during the flow of food process in their school foodservice process. Then, have participants write what processes their district uses to prevent that situation of cross-contact.
4. Take 5 minutes and encourage a few participants to report for each process.

SAY: It is crucial that avoiding cross-contact be included in your school's food allergy management plan. Please turn in your Participant's Workbook to the **Preventing Cross-Contact Plan** worksheet. For your school kitchen, write situations where cross-contact can occur during the flow of food process. Then, write what processes your district uses to prevent that situation of cross-contact. If you have any questions you need to research, write them at the bottom.

Preventing Cross-Contact Plan

Instructions: For your school kitchen, write situations where cross-contact can occur during the flow of food process. Then, write what procedures your district uses to prevent that situation of cross-contact. If you have any questions you need to research, write at the bottom.

	Cross-Contact Occurs	Procedure for Avoiding It
Receive 		
Store 		
Prepare 		
Cook 		
Hold 		
Serve 		
Store 		

Research:

Instructor's Note: This is an example list of processes for preventing cross-contact in the Receiving Area of the kitchen.

Example:
- Inspect the delivery vehicle for possible cross-contact.
- Visually inspect all items and look for signs of contamination or container damage.
- Check expiration and pack dates.
- Check substitutions for approved brands and check product labels.
- Reject unacceptable items.

DO: Allow participants 5 minutes for individual work. For another 5 minutes, ask some participants to share their best practices as you walk through each process.

SHOW SLIDE: ***Avoiding Cross-Contact Scenario Activity***

DO: Activity: Avoiding Cross-Contact Scenario

Materials: Avoiding Cross-Contact Scenario Cards (see Appendix), **Avoiding Cross-Contact Scenarios Potential Answers** handout, and **Best Practice for Cross-Contact Scenarios** worksheet

Time: 5 minutes of group work, 15 minutes to present to the class

Instructions:
1. Ask participants to turn in their Participant's Workbooks to the **Best Practice for Cross-Contact Scenarios** worksheet.
2. Divide participants into six groups.
3. Assign each group a given scenario.
4. Tell them to read the scenario, identify the hazard, discuss how their school addresses this hazard, and create a best practice to share with the class for preventing this hazard. Participants can write their answers on the **Best Practice for Cross-Contact Scenarios** worksheet.
5. Give participants 5 minutes to come up with an answer to their scenario.
6. Have participants read their scenarios and provide their best practice for the next 15 minutes.
7. Encourage other groups to add additional best practices after the group is finished presenting.

SAY: I am going to divide everyone into six groups and give each group a scenario for avoiding cross-contact. You will need to discuss the scenario and identify the hazard that may or has occurred. Your group will discuss what your schools do to address this hazard. As a group, create a best practice for avoiding cross-contact for your scenario.You can record your responses on the **Best Practice for Cross-Contact Scenarios** worksheet.

DO: Allow groups 5 minutes to discuss their scenario and create a best practice. Each group will present their best practice to the class. Possible answers have been provided in the **Avoiding Cross-Contact Scenarios Potential Answers** handout.

Avoiding Cross-Contact Scenarios Potential Answers

Receiving

- Scenario: When receiving dry goods, you notice flour all over the back of the truck. The driver explained that a bag had broken open. The flour is on everything, including the canned goods you just received.
- Hazard: Possibility of flour getting into foods in the truck.
- Best Practice:
  - Option 1: Have a procedure in place to refuse unsafe deliveries.
  - Option 2: Thoroughly wash cans with soap and water before using.

Storing

- Scenario: The designated allergen-free food shelf has an allergen-containing food on it.
- Hazard: Chance of allergen getting into allergen-free food.
- Best practice: Check to ensure that the allergen-free items are in secure packaging. Discard any allergen-free foods that may have come in contact with the allergen.

Preparing

- Scenario: The cans of fruit cocktail pulled for lunch are covered in flour.
- Hazard: Flour can get into the fruit cocktail when the can is opened.
- Best practice: Thoroughly wash cans with soap and water before using.

Cooking

- Scenario: The pan used to bake fish sticks is used for baking skinless chicken breasts without cleaning in between.
- Hazard: Fish proteins may still be present on the pan and cross-contact with chicken.
- Best practice: Mark the chicken breasts in accordance with your school food allergy management plan that they are not safe to serve to students with fish allergies.

Serving

- Scenario: While serving food on the line, you realize you have used the fish stick tongs to serve French fries.
- Hazard: Fish protein may be present on the tongs. The French fries may now have fish proteins in them.
- Best practice: Replace both tongs with washed, rinsed, and sanitized tongs. Replace French fries with a fresh batch.

Holding

- Scenario: The remaining burgers are moved to the same pan to place in the hot-holding cabinet between lunches. Burgers containing soy are placed on one side of the pan, and soy-free burgers are on the other.
- Hazard: Cross-contact may have occurred between soy burgers and beef burgers.
- Best practice: Mark the burgers in accordance with your school food allergy management plan that they are not safe to serve to students with soy allergies.

Best Practice for Cross-Contact Scenarios

Instructions: Read the scenario assigned by the trainer. From the scenario, identify the hazard, discuss how your school addresses this hazard, and create a best practice to share with the class for preventing this hazard.

Scenario name (receiving, storing, etc)**:**

What are the hazard(s) in this scenario (physical, chemical, bacteria, radiological)**?**

How does your school nutrition program address this hazard?

What are some best practices for preventing this situation of cross-contact?

SAY: Great job!

SHOW SLIDE: ***Lesson 3 Review***

SAY: We have now finished our third lesson, Avoiding Cross-Contact. We have covered how to:

- Define cross-contact.
- Examine how cross-contact may occur in a school nutrition program.
- Develop strategies for preventing cross-contact.

ASK: What questions do you have before we proceed?

Lesson 4: Accommodating Students With Food Allergies

Time	Topic	Activity	Materials
	Introduction to lesson		
Objective: Describe methods for accommodating and supporting students with food allergies.			
10 minutes	School nutrition professionals' role in accommodating students with food allergies	Group discussion of handouts	• Laws Related to Disabilities and Privacy handout • Role of the School Nutrition Staff in Food Allergy Management handout
Objective: Determine strategies to manage food prepared and served outside of the cafeteria.			
15 minutes	Managing outside food for food allergens	Reduce the Risk	• Reduce the Risk worksheet • Chart paper • Markers
25 minutes			

Lesson 4: Accommodating Students With Food Allergies

SHOW SLIDE: *Lesson 4: Accommodating Students With Food Allergies*

SAY: In our last lesson, we will discuss ways to provide meal modifications for students with food allergies safely. Our objectives include defining the roles of school nutrition professionals in accommodating students with food allergies and managing food from outside of the cafeteria. We will start our discussion with how to respect and protect students with food-related disabilities.

Objective: Describe methods for accommodating and supporting students with food allergies.

SHOW SLIDE: *Respect Students With Food Allergies*

SAY: Along with ensuring that the food we serve students is safe, respecting and protecting the privacy of students with food allergies is important. Civil rights and privacy laws apply to all of us. When food allergies or intolerances are considered a disability, schools are required by Federal laws and regulations to make a meal modification.

You may have heard of schools or be a school that bans certain allergens. Unfortunately, allergens are everywhere, and most experts recommend we understand and manage allergens rather than ban foods. There is no way to provide 100% confidence that the allergen will not be introduced. The CDC recommends providing Allergy Safe Zones coupled with education and training. However, students with allergies should never be forced to use these zones or singled out for their allergy. Students with food allergies often want to fit in with their peers and not be singled out for their allergies.

SHOW SLIDE: *Protect Students With Food Allergies*

SAY: Research done by FARE shows that students with food allergies may be bullied, teased, or harassed at school, not only by other students but sometimes by teachers and school staff. Verbal abuse appears to be the most common offense. In reported cases, students describe being physically threatened by having the allergen thrown at them, dangled in front of them, or smeared on them. You should know what steps to take when someone is bullying a student with food allergies. Always encourage them to notify an adult if they are being harassed or threatened by other students or adults regarding their food allergies.

Please turn to the **Laws Related to Disabilities and Privacy** handout in your Participant's Workbook. This handout details the laws related to food allergy management in schools. We will only briefly cover these laws, but this handout provides further information.

Laws Related to Disabilities and Privacy

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: • National School Lunch Program • School Breakfast Program • Fresh Fruit & Vegetable Program • Afterschool Snack Program 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 students with disabilities ages 3–21 IEP Plan derived from this law
Americans with Disabilities Act (ADA) 1990 and 2008 Amendments	Broadens and extends civil rights protection for approximately 50 million Americans with disabilities All food allergies and intolerances have the potential to be considered disabilities Major life activities examples include (but are not limited to) caring for oneself, performing manual tasks, seeing, hearing, eating, sleeping, walking, standing, lifting, bending, speaking, breathing, learning, reading, concentrating, thinking, communicating, and working Major bodily function examples include (but are not limited to) functions of the immune system; normal cell growth; and digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions
The Health Insurance Portability & Accountability Act (HIPAA) 1996	Requires all medical records disclosed to be kept confidential Gives patients the right 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*. https://www.fns.usda.gov/2017-edition-accommodating-children-disabilities-school-meal-programs

SHOW SLIDE: *Federal Disability Laws*

SAY: In *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*, the USDA outlines three Federal laws that cover the treatment of those with disabilities participating in Federal programs, like Child Nutrition Programs.

1. *Rehabilitation Act of 1973; Section 504 of the Act*
2. *Individuals with Disabilities Education Act (IDEA)*
3. *Americans with Disabilities Act (ADA)*

For school nutrition programs, these laws prohibit the discrimination of people with disabilities and require accommodations be made so that those individuals have an equal opportunity to benefit from Federal programs.

In 2008, *ADA Amendments Act* broadened the definition of disabilities to include most food allergies and intolerances. ADA broadened the definition of disabilities to encompass impairments that limit major life activities and major bodily functions. More details about major life activities and bodily functions are featured on the **Laws Related to Disabilities and Privacy** handout. A State licensed healthcare professional will determine whether a student has a disability. A student's condition does not have to be life-threatening to be considered a disability; for example, a food allergy may be considered a disability even if it does not cause anaphylaxis and is not life-threatening.

SHOW SLIDE: *Federal Privacy Laws*

SAY: The two laws that deal with privacy for students with disabilities are the *Health Insurance Portability and Accountability Act* of 1996 (HIPAA) and the *Family Educational Rights and Privacy Act* of 1974 (FERPA). These laws require schools to keep medical information (in any form) about a student, including a food allergy or food intolerance, confidential and to protect the privacy of the student.

ASK: How does your district keep the information you receive confidential?

FEEDBACK:

- Keep it in a locked file cabinet.
- Keep it electronically in a password-protected file.
- Look at it in the office and leave it in the office.
- Point-of-sale system
- Cafeteria manager's copy
- School Nurse ⟶ School Nutrition Director (keeps it in a locked cabinet) ⟶ School Nutrition Staff (aware of students with allergies and what not to serve them)

SAY: If these laws are violated, a civil rights complaint could be filed, and an investigation would ensue. Creating an environment of responsible communication of confidential information will help to alleviate possible complaints. SOPs and training for how the school keeps student information private should be provided to all staff. Showing the parents or guardians that the school has a food allergy management plan in place and that you understand the necessity of following the student's medical statement will build trust with the family.

ASK: This was a quick overview of regulations. What questions do you have?

DO: Allow some time for questions. Answer any questions to the best of your abilities. Write down any questions you cannot answer and contact ICN for clarification.

SHOW SLIDE: *Strategies to Accommodate Students With Food Allergies*

SAY: The FDA launched the new Food Code in December 2022. It added sesame to the list of major allergens. It also requires the Person in Charge, or food safety trained person on-site at a school, to properly train employees in food safety, including food allergy awareness. This training needs to relate to an employee's assigned duties. Food allergy awareness includes being able to identify the major food allergens and the symptoms of an allergic reaction.

Be aware of the food allergies in your school. This means knowing which students have allergies and protecting those students when food is prepared and served. Also, be mindful of what food allergies are in your school when planning menus, ordering inventory, and receiving products.

Develop a partnership with open communication and education for all involved in the student's care. Communication and education will help the school nutrition department get the needed information about a student's food allergy. This partnership could include students (if age-appropriate), parents/guardians, school nurses, teachers, principals, etc.

School nutrition programs (SNP) need to understand what is required of them to serve food safely to students with food-related disabilities such as food allergies. Required meal modifications will be communicated in a written food allergy care plan for the student. It is vital that the school nutrition department implement the meal modifications from the State licensed healthcare professional as described in the student's plan.

SHOW SLIDE: *Written Plans for Food Allergies*

SAY: Students with disabilities, including food allergies, should have a written plan for managing their disabilities. This plan could be a 504 Plan, Individualized Education Plan (IEP), or Individualized Healthcare Plan (IHP). These plans are written and agreed to by a team. This team may include professionals at the school, the parent or guardian, and the student (when they are age appropriate). If the plan involves meal modifications from the school nutrition program, someone from the SNP should be part of the meeting, or a team member should clearly communicate to the SNP what meal modifications are written in the plan.

ASK: How do you know which students in your school have food allergies and what they are?

SHOW SLIDE: *School Meal Requirements*

SAY: USDA *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals* is clear that when a student's disability prevents them from eating or drinking a school meal **as prepared**, meal modifications **must** be made. Modifications include but are not limited to, procedures such as providing an allergen-free meal and a safe environment for consuming the meals. Such meals are reimbursable at the free, reduced price, or paid rates even if they do not meet the meal pattern. If a food-related disability causes a student to need a meal that does not follow the school meal pattern, a written medical statement signed by a State licensed healthcare professional is required for reimbursement. Cashiers need to be notified when a meal modification does not meet the meal pattern regulations so they know that the substitution is allowed.

A student cannot be charged extra for these meal modifications. Any additional cost of providing meals to students with disabilities is an allowable use of nonprofit school food service account funds. When the nonprofit account cannot absorb such costs, additional funds, including general school district funds, Special Education funds, and/or other funding sources, may be available. If asked to provide an expensive food item, have a discussion with the parents or guardians first to talk about alternatives. School nutrition programs are not required to make exact substitutions (i.e., specific brand names) if another reasonable meal modification is available (i.e., store brand) that effectively accommodates the disability and provides equal opportunity to participate in or benefit from the program. If funding meal modifications becomes an issue, SNPs are encouraged to work with their State agency and possibly other offices in the Department of Education to identify possible funding sources.

SHOW SLIDE: *Medical Statement Requirement for Federal Reimbursement*

Only a State licensed healthcare professional can make a disability determination. If a student's food allergy meal modification does not meet the school meal pattern requirements, a medical statement from the State licensed healthcare professional is required. If a meal modification for a student's disability can be made within the meal pattern, USDA, Food and Nutrition Service (FNS) does not require a medical statement for reimbursement. A medical statement may still be required by a school district, local health authority, or State agency, and it may help select appropriate foods within the meal pattern.

SHOW SLIDE: *Medical Statement*

The medical statement should contain each of the following:

1. A clear description of the student's physical or mental impairment that explains how the disability restricts the student's diet (i.e., school nutrition staff should know the student's food allergy(s) and what allergic reactions they have)
2. An explanation of what must be done to accommodate the student's disability
3. The food or foods to be omitted and recommended alternatives (i.e., a substitution or modified meal)

It is vital to follow the medical instructions of the State licensed healthcare professional. Do not make guesses or variations from the medical statement. The school staff must ensure that they understand the information provided. If your program is unable to make the meal modifications as instructed, does not understand something in the statement, or if the statement does not provide enough information, seek additional information from the parents or guardians and the State licensed healthcare professional (as permitted by the parents or guardians).

However, the school nutrition staff should not delay in providing a meal modification and a safe environment (i.e., prevent exposure to known allergens) while awaiting clarification of the medical statement. Staff should follow the portion of the medical statement that is clear to the greatest extent possible while waiting on the additional information or amended statement. USDA, FNS strongly encourages school nutrition programs to document in detail the actions taken to provide meal modifications for a student with food allergies.

SHOW SLIDE: *Menu Planning Tips*

When planning meals for students with food allergies, see what allergen-free options are already available in the menu cycle. From there, determine if a reimbursable meal can be made for the student with the existing allergen-free food options. This approach will minimize the need for special recipes or menu substitutions.

Offer Versus Serve (OVS) is another method for serving students with food-related disabilities. OVS allows students to choose what foods they eat. Schools can use OVS to offer various options for students with food allergies. For example, if a student is allergic to apples, but you offer apples and bananas using OVS, then the student can take the banana without additional menu adjustment needed. The food provided for a student with a food allergy must be nutritionally equivalent. For example, you could not give a student with a wheat allergy an extra piece of fruit to avoid bread; the student must be given a nutritional equivalent, such as wheat-free bread.

In many cases, meal modifications for students with special dietary needs based on cultural, religious, or other preferences can also be addressed through OVS or by providing additional selections. For example, a school could provide another meat/meat alternate when pork is served. Since there is no disability, accommodation is not required, but schools are encouraged to meet these requests as a gesture of support and customer service.

ASK: What modifications has your school made for a student with a food allergy or food intolerance?

DO: Allow participants time to respond.

SAY: A young student will need assistance with food choices to avoid allergens. As the student gets older, they will need less assistance making choices. Use of careful preparation and service, following SOPs, and verifying that the procedures are effective will prevent cross-contact.

ASK: Do any of you help students make selections from regular offerings?

DO: Allow participants time to respond.

SHOW SLIDE: *The Team*

SAY: Please turn in your Participant's Workbook to the **Roles of School Nutrition Staff in Food Allergy Management** handout. This handout details ways you can be part of a team with open communication and education for all those involved with your district's food allergy management.

Roles of School Nutrition Staff in Food Allergy Management

Some of the ways you do your part for the food allergy team are to:

- Create an environment where students with food allergies will be safe.
- Read food labels carefully.
- Communicate and share the ingredient statement information with school staff, parents or guardians, and students.
- Prevent cross-contact with potential food allergens by following food safety SOPs.
- Follow the food allergy management plan set by the school district.
- Ensure a safe school environment by reporting any discrimination or bullying.
- Have a system in place to identify students with food allergies without compromising privacy or confidentiality rights.
- Make meal modifications for students with food allergies according to their individual allergy plans.
- Know the emergency response protocol to respond to an allergic reaction incident.
- Train all your staff, including substitutes, on food allergies.
- 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*. www.cdc.gov/healthyyouth/foodallergies/

SAY: Keeping students with allergies safe in schools is a community effort. Have a good communication system with your school nurse and other food allergy management team members. Together you can coordinate accommodations. Always make sure to include the point of contact for food allergy information in your school nutrition in the conversation so that everyone knows the same information. Communication with key team partners will support efforts to provide safe food to all your students and staff. As you remember, in the *Caitlin Remembered* video we watched earlier, a lack of communication contributed to a student dying from an allergic reaction.

SHOW SLIDE: *Accommodating Students With Other Food-Related Disabilities*

SAY: Food allergies are not the only food-related disabilities that you may encounter and need to accommodate. For instance, diabetes and phenylketonuria (PKU) both require that accommodations be made in school meals. There are also accommodations needed in other situations, such as for students who are tube-fed or require food to be pureed for medical reasons. The information in USDA's guidance, *Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals*, applies to all of these situations.

Objective: Determine strategies to manage food prepared and served outside of the cafeteria.

SHOW SLIDE: *Strategies to Manage Outside Food*

SAY: Besides the food you prepare and serve in the cafeteria, there may be food made by an outside source that is prepared and served in the cafeteria (e.g., food supplied by a restaurant or caterer).

ASK: How do you communicate about food allergies with these outside suppliers?

DO: Pause to listen to participant responses.

SAY: There are many opportunities for you to prepare food in the cafeteria and serve it outside the cafeteria, for instance, Breakfast in the Classroom or the Fresh Fruit and Vegetable Program.

ASK: What are some other instances where food prepared in the cafeteria is served outside of the cafeteria?

DO: Pause to listen to participant responses.

FEEDBACK: Afterschool program, field trip, PTA meeting, sporting event, etc.

ASK: How do you distinguish an allergen-free food from other food items for a program such as Breakfast in the Classroom?

DO: Pause for participant responses.

FEEDBACK:
- Wrap, separate, and label allergen-free food
- Have separate allergen-free travel container

ASK: What other food allergy problems could happen once this food leaves the kitchen?

DO: Pause for participant responses.

FEEDBACK:
- Lose control once the food is delivered
- Not sure what cleaning methods are used on surfaces
- Not sure what handwashing procedures are used
- Not sure how leftovers are stored

SAY: Then, there are other situations where outside food is served throughout the school, such as potluck celebrations, classroom projects, school organizations, or club and sporting events.

ASK:
- What are the food allergy complications surrounding this food?
- Are you involved with any of these events?
- Would you be questioned or implicated if there was a food allergy emergency?
- Would the people think the food came from nutrition services?

DO: Pause to listen to participant responses.

SHOW SLIDE: *Reduce the Risk Activity*

SAY: The next activity presents scenarios where you must manage food from outside sources.

DO: Activity: Reduce the Risk

Materials: Reduce the Risk worksheet, **Reduce the Risk Answers** handout, chart paper (one per table), markers

Time: 5 minutes of group work, 15 minutes of class discussion

Instructions:
1. Divide participants into five groups.
2. Give each group a scenario of a student with a food allergy being fed food from an outside vendor.
3. Have the group discuss possible solutions for keeping the student safe.
4. Have groups write their solutions on the chart paper and choose a spokesperson to report out. If participants need assistance, use the **Reduce the Risk Answers** handout to provide potential solutions.

SAY: Please turn in your Participant's Workbook to the **Reduce the Risk** worksheet. I'm going to count you off into five groups. Each group will be assigned one of the scenarios. You will determine how to safely provide food to a student with known life-threatening food allergies from an outside food source. Record the actions you would take to provide for the student on the chart paper. Select a spokesperson from your group to share.

DO: Assign a scenario to each group. Allow 5 minutes for groups to discuss and write out solutions. Then ask each group to choose a spokesperson and report their solution.

Reduce the Risk Possible Answers

Instructions: For your assigned scenario, work in a group to determine how to safely provide food from an outside source to a student with known life-threatening food allergies. Record the actions you would take to provide for the student on the chart paper. Select a spokesperson from your group to share how you would provide for the student.

Group	Scenario	Actions to Provide
A	Xander has a wheat allergy. His eighth-grade class does Breakfast in the Classroom. Pre-made omelets with cheese sauce are on the menu. The cheese sauce contains wheat.	Determine an appropriate substitute for Xander that does not contain wheat. Prepare the substitute so that cross-contact does not occur. Wrap, label, and separate Xander's food to prevent cross-contact.
B	Ashlee is going on a field trip with her fourth-grade class. The students will get lunch from a local fast-food restaurant that serves fried fish. Ashlee is allergic to fish.	Coordinate with the school staff to provide an appropriate substitution, such as a meal from the school nutrition program. Alternatively, review the fast food menu to identify the items that should be avoided.
C	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 the student in selecting 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 student when the food arrives; keep food separate and in a warmer.
D	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. Ensure donations come with ingredient statements to look for allergens. Train the students 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 the afterschool program.
E	Rachel, age 12, tells the cafeteria monitor, "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.	Follow the 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 the school nurse or district nurse of the situation.

SAY: Please select a spokesperson and share your findings with the group.

DO: Allow 15 minutes for groups to report.

SHOW SLIDE: ***Lesson 4 Review***

SAY: We finished our fourth lesson, Accommodating Students with Food Allergies. We have covered ways to manage food allergies in schools through:

- Describing methods for accommodating and supporting students with food allergies
- Determining strategies to manage food prepared and served outside of the cafeteria

ASK: Do you have any questions?

Wrap Up

Time	Topic	Activity	Materials
5 minutes	Action plan	Make It Stick	• Participant's Workbook • Pen or pencil • Food Allergy Resources handout • *Food Safety Spotlight: Food Allergies*
10 minutes		Post-Assessment	• Post-Assessment • Course Evaluations • Certificates
15 minutes			

Wrap Up

SAY: We have learned a lot about food allergies today. We are going to take some time now to discuss some items and answer questions that you have.

DO: Review and answer any question on the "Bike Rack" chart paper.

SHOW SLIDE: *Make It Stick*

DO: Activity: Make It Stick

Materials:
- Participant's Workbook
- Pen or pencil

Time: 5 minutes of individual work

Instructions:
1. Ask participants to find their **Food Allergy Emergency** worksheet in Lesson 1 and the **Reading Food Labels** worksheet in Lesson 2.
2. On the front of their Participant's Workbook, have participants list questions to research.
3. Next, have participants answer, "What is the FIRST food allergy task I plan to do when I get back?"
4. Ask a few participants what they wrote.

SAY: Please turn to look at the **Food Allergy Emergency** worksheet in Lesson 1 and the **Reading Food Labels** worksheet in Lesson 2. Please take a second to review them and gather your thoughts. Then on the front of your Participant's Workbook, list questions to ask your director and write your answer to this question, "What is the FIRST food allergy task that I plan on doing when I get back?"

DO: Allow 1–2 minutes for participants to write their answers.

ASK: Would a few of you share what you wrote?

DO: Allow 1–2 minutes for participant responses.

SAY: In your Participant's Workbook, there is a list of resources about food allergies. You can use these resources to help educate your staff and school.

Food Allergy Resources

Manuals

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

Food Allergy Research & Education. (2020). *Your food allergy field guide*. https://www.foodallergy.org/resources/field-guide-english

U.S. Department of Agriculture, Food and Nutrition Service. (2017, July 25). *Accommodating children with disabilities in the school meal programs – Guidance for school food service professionals*. https://www.fns.usda.gov/2017-edition-accommodating-children-disabilities-school-meal-programs

Website Resources

Centers for Disease Control and Prevention
http://www.cdc.gov/healthyyouth/foodallergies/

Food Allergy Research and Education (FARE)
http://www.foodallergy.org/

Institute of Child Nutrition
- Food Allergy Resources, including fact sheets and micro-trainings: www.theicn.org/foodsafety
- *Food Allergies for School Nutrition* online courses: www.theicn.org/elearning
- Food Safety Standard Operating Procedures: www.theicn.org/foodsafety

United States Department of Agriculture, Food and Nutrition Service
https://www.fns.usda.gov/ofs/food-safety

SHOW SLIDE: *Food Safety Spotlight: Food Allergies*

SAY: ICN created a resource for training your staff on the food allergy topics you learned today. *Food Safety Spotlight: Food Allergies* is designed to give managers an easy-to-use lesson plan for training staff in various food safety topics. Each lesson is roughly 15 minutes and contains the following:
- Learning objective
- Statement explaining the importance of the topic
- List of materials
- Instructions on how to present the information
- Questions to ask staff
- Suggested responses to questions
- Additional resources to strengthen or refresh the knowledge of the manager

SHOW SLIDE: *Post-Assessment*

SAY: We have just a few more things before today's class ends. I will have you complete the post-assessment and course evaluation, and we will be sure everyone signed the roster.

DO: Activity: Post-Assessment

Materials: Post-Assessment slide with QR Code, smartphones (each participant)

Time: 10 minutes of individual work

Instructions:

1. Read the following instructions to the participants:
   a. Using your smartphone, open the camera app.
   b. Point your camera at the QR code on this slide. Your browser should open with an ICN post-assessment.
   c. Read the instructions on the screen. Then, read each question carefully and select the best answer.
   d. Once you have finished, select "Submit" at the bottom of the screen.
2. Allow time for participants to take the post-assessment.

SAY: I will now post the QR code for the post-assessment. Answer the questions to the best of your ability. We have gone over all the content during the training.

DO: Refer to the answer key and review the answer for each question.

SHOW SLIDE: *Training Wrap Up*

ASK: What questions may I answer for you?

DO: Provide participants with the course evaluation form. Make sure all participants have signed the attendee roster. Provide attendees with a Certificate of Attendance.

SAY: Please complete the training evaluation forms.

SHOW SLIDE: *Thank You!*

SAY: Accessing ICN via the web is an excellent way to access important, timely, and expertly designed resources. Numerous food allergy, food safety, food security, and emergency management resources are available to download free from the ICN website (www.theicn.org).

Thank you for participating today; be a PAL by Protecting a Life from food allergies.

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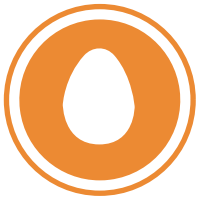
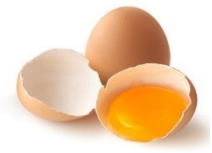
Appendix

Allergen Picture Printouts
Ingredient Statement Printouts
Label Reading Role-Play Cards
Avoiding Cross-Contact Scenario Cards

Nine Major Allergens

MILK	EGGS
 	 
WHEAT	**PEANUTS**
 	 
TREE NUTS (e.g., walnuts, almonds, cashews, pistachios, and pecans)	**SOY**
 	 
FISH	**CRUSTACEAN SHELLFISH** (e.g., crab, lobster, and shrimp)
 	 
SESAME	**OTHER ALLERGENS**
 	

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). **CONTAINS: MILK**

Label B

INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEAROYL LACTYLATE, PARTIALLY HYDROGENATED CANOLA OIL, BUTTERMILK PRODUCT, TURMERIC (COLOR).
CONTAINS: MILK

Label C

Ingredients: Durum flour & semolina blend, fiber, niacin, iron (ferrous sulfate), thiamin mononitrate, riboflavin, folic acid.

Allergy Information: has flour ingredients and is manufactured in a facility that uses eggs.

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.

Label E

INGREDIENTS: WATER, DISTILLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, SESAME SEEDS, 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

Label F

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

Label Reading Role-Play Cards

Instructions: Cut each scenario into individual word strips to give to groups.

1. A student allergic to peanuts was served a soy butter sandwich. Her very upset parent comes to you because the student did not eat lunch since she thought it was a peanut butter sandwich.

2. The cook reviewed a food label and noticed a food allergen that was not normally on the label and was not flagged. The food is on the line about to be served.

3. You pull frozen chicken tenders from the freezer, but no food label is on the bag. All ingredient information was on the box that was recycled.

4. While reading a food label, you notice that the pasta sauce now contains wheat.

5. The substitute cook could not find the label for the USDA Foods meatballs, so he used the USDA Foods Fact Sheet.

6. The person that usually reads the labels is out today, and a substituted product has been delivered.

Avoiding Cross-Contact Scenario Cards

Instructions: Cut each scenario into individual word strips to give to groups.

Receiving
When receiving dry goods, you notice flour all over the back of the truck. The driver explained that a bag had broken open. The flour is on everything, including the canned goods you just received.

Storing
The designated allergen-free food shelf has an allergen-containing food on it.

Preparing
The cans of fruit cocktail pulled for lunch are covered in flour.

Cooking
The pan used to bake fish sticks is used for baking skinless chicken breasts without cleaning in between.

Serving
While serving food on the line, you realize you have used the fish stick tongs to serve French fries.

Holding
The remaining burgers are moved to the same pan to place in the hot-holding cabinet between lunches. Burgers containing soy are placed on one side of the pan, and soy-free burgers are on the other.

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