Food Allergies for School Nutrition Directors

Creating a Food Allergy Management Plan

Instructor’s Manual
Food Allergies for School Nutrition Directors
Creating a Food Allergy Management Plan

Instructor’s Manual

Time: 12 hours

PROJECT COORDINATOR
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EXECUTIVE DIRECTOR
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Key Area: 2
Code: 2600 (Food Safety and HACCP)

2018
Institute of Child Nutrition

The University of Mississippi

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

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

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

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10/22/2018
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Background Information

**Instructor’s Note:** The purpose of the background information section is to help you become familiar with the context of the lesson. It is not a part of the lesson detail.

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

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

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

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

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

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

Prompts are as follows:

**SAY:** What the instructor is to say to participants. This is the content that 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 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 manual includes a Pre-/Post-Assessment that will be administered at the beginning and at the end of the training.
Professional Standards

FOOD SAFETY AND HACCP TRAINING – 2600

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

2620 - Food Safety - General
2630 - Federal, State, and Local Food Safety Regulations
2640 - Food Safety Culture

Key Area: 2

Training Objectives

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

The following are ground rules and expectations for this lesson.

1. Show up on time and come prepared.
2. Stay mentally and physically present.
3. Let everyone participate.
4. Listen with an open mind.
5. Think before speaking.
6. Attack the problem not the person.
## Training-At-A-Glance

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Introduction</strong></td>
<td>Warm-Up</td>
<td>• Flip chart paper&lt;br&gt;• Easel&lt;br&gt;• Markers&lt;br&gt;• Table tents</td>
<td>40 minutes</td>
</tr>
<tr>
<td></td>
<td>Pre-Assessment</td>
<td>• Pre-Assessment&lt;br&gt;• Pen or pencil</td>
<td>10 minutes</td>
</tr>
<tr>
<td><strong>Lesson 1: All About Food Allergies</strong></td>
<td>The Power of a Story</td>
<td>• Caitlin Remembered video&lt;br&gt;• Laptop speakers&lt;br&gt;• Projector&lt;br&gt;• Reflection and Impact worksheet&lt;br&gt;• Flip chart paper&lt;br&gt;• Markers</td>
<td>35 minutes</td>
</tr>
<tr>
<td></td>
<td>Epinephrine Auto-Injectors Demonstration</td>
<td>• Food Allergy Fact Sheet&lt;br&gt;• FARE Recognize and Respond to Anaphylaxis poster&lt;br&gt;• Sample Auto-Injectors&lt;br&gt;• FARE Food Allergy and Anaphylaxis Emergency Care Plan handout&lt;br&gt;• Food Allergy Emergency worksheet&lt;br&gt;• Flip chart paper&lt;br&gt;• Markers</td>
<td>45 minutes</td>
</tr>
<tr>
<td></td>
<td>Food Emergency Questions</td>
<td>• Eight Major Allergens handout&lt;br&gt;• FARE Tips for Avoiding Your Allergen handout</td>
<td>10 minutes</td>
</tr>
<tr>
<td></td>
<td>Distinguish between food allergy and food intolerance.</td>
<td>• Food Allergies and Food Intolerances handout&lt;br&gt;• CDC Guidelines for Managing Food Allergies handout&lt;br&gt;• Food Allergy Management Plan Outline</td>
<td>25 minutes</td>
</tr>
<tr>
<td>Objective</td>
<td>Activity</td>
<td>Materials</td>
<td>Duration</td>
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<tr>
<td><strong>Lesson 2: Reading Labels for Allergens</strong></td>
<td>Demonstrate how to find the eight major food allergens in the ingredient statement on the food label.</td>
<td>Hide and Seek Label Reading</td>
<td>Reading Ingredient Statements for Food Allergens handout</td>
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<td></td>
<td>FARE Tips for Avoiding Your Allergen handout</td>
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<td></td>
<td></td>
<td></td>
<td>Hide and Seek Label Reading worksheet</td>
</tr>
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<td></td>
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<td></td>
<td>Ingredient statement printouts</td>
</tr>
<tr>
<td>Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.</td>
<td></td>
<td></td>
<td>Tips for Managing Food Allergies in Bulk Items and USDA Foods handout</td>
</tr>
<tr>
<td>Outline methods for managing food labels.</td>
<td>Strategies for Managing Food Labels</td>
<td></td>
<td>Managing Allergies in a School video</td>
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<td></td>
<td>Speakers</td>
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<td></td>
<td></td>
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<td>Projector</td>
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<td></td>
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<td>Flip chart paper</td>
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<td></td>
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<td>Markers</td>
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<td></td>
<td></td>
<td></td>
<td>Strategies for Managing Food Labels worksheet</td>
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<td></td>
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<td></td>
<td>Food Allergy Management Plan Outline</td>
</tr>
</tbody>
</table>

<p>| <strong>Lesson 3: Avoiding Cross Contact</strong> | Explain cross contact. | Where Are the Allergens? | | 15 minutes |
| | | | Glo-germ® | |
| | | | 2 spatulas | |
| | | | Black light | |
| | | | Cleaning and Sanitizing Fact Sheet | |
| Examine how cross contact may occur, and develop strategies for preventing it. | Avoiding Cross Contact Preventing Cross Contact in the Kitchen | | Avoiding Cross Contact worksheet | 70 minutes |
| | | | Methods for Avoiding Cross Contact handout | |
| | | | Cleaning and Sanitizing Food Contact Surfaces Sample SOP | |
| | | | Serving Safe Food to Students with Food Allergies Sample SOP | |
| | | | Flow of Food SOPs worksheet | |
| | | | Food Allergy Management Plan Outline | |</p>
<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>List the laws for accommodating students with food allergies, and describe how they impact a school nutrition program.</td>
<td></td>
<td>• Food-Related Laws handout</td>
<td>35 minutes</td>
</tr>
<tr>
<td>Discuss accommodating child with food allergies and the documentation needed.</td>
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<td>• CDC Guidelines for Managing Food Allergies handout</td>
<td>20 minutes</td>
</tr>
<tr>
<td>Determine how to engage and educate stakeholders in managing food allergies in schools.</td>
<td>Develop Plan to Promote Food Allergy Awareness in Schools</td>
<td>• Food Allergy Stakeholders handout&lt;br&gt;• CDC Food Allergy Training Recommendations for Schools handout&lt;br&gt;• Develop Plan to Promote Food Allergy Awareness in Schools worksheet</td>
<td>40 minutes</td>
</tr>
<tr>
<td>Determine strategies to manage food prepared and served outside of the cafeteria.</td>
<td>Reduce the Risk</td>
<td>• Reduce the Risk handout&lt;br&gt;• Flip chart paper&lt;br&gt;• Markers&lt;br&gt;• Food Allergy Management Plan Outline</td>
<td>45 minutes</td>
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</tbody>
</table>

**Lesson 5: Food Allergy Management Plan**

| Analyze the roles of various stakeholders in food allergy management at a school. | Food Allergy Tabletop Exercise                                          | • Food Allergy Tabletop Exercise<br>• Food Allergy Tabletop Exercise handout                  | 160 minutes |
| Finalize an outline of a food allergy management plan. | Outline a Food Allergy Management Plan                                  | • CDC Guidelines for Managing Food Allergies handout<br>• Food Allergy Management Plan Outline | 35 minutes  |

**Wrap-Up**

| Make It Stick | • Flip chart paper<br>• Markers<br>• Sticky notes<br>• Pen or pencil<br>• Food Allergy Resources handout | 20 minutes |
| Post-Assessment | • Post-Assessment<br>• Course Evaluations | 10 minutes |

**Total time: 12 hours (720 minutes)**
### Preparation Checklist

**Instructions:** The following tasks are necessary for presenting this lesson. Assign each task to a specific person and determine the date that each task must be completed. Keep track of the progress by recording information on the tracking form and checking off tasks as they are completed. [Items may vary according to needs of particular lessons.]

<table>
<thead>
<tr>
<th>Task</th>
<th>Person Responsible</th>
<th>Completion Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Reserve equipment and gather supplies as needed for use on the day of class (6 weeks prior).</td>
<td>Instructor’s Manual</td>
<td></td>
</tr>
<tr>
<td>Participant’s Workbook (one per participant)</td>
<td></td>
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<tr>
<td>Roster of participants</td>
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<tr>
<td>Participants’ sign-in sheets</td>
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<tr>
<td>Agenda</td>
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<tr>
<td>FARE handouts (one of each for every participant)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>- Recognize and Respond to Anaphylaxis</td>
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<tr>
<td>- Food Allergy and Anaphylaxis Emergency Care Plan</td>
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<td></td>
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<tr>
<td>- Tips for Avoiding Your Allergen</td>
<td></td>
<td></td>
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<tr>
<td>Food Allergy Management Plan Outline</td>
<td></td>
<td></td>
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<tr>
<td>Evaluations</td>
<td></td>
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<tr>
<td>Pre-/Post-Assessments and answers are available at <a href="http://www.theicn.org">www.theicn.org</a></td>
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<tr>
<td>Sample Epinephrine Auto-Injectors <em>(3–5 of each brand)</em></td>
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<tr>
<td>Microphone (preferably wireless lapel/lavalier)</td>
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<tr>
<td>Computer to present slides and/or DVD</td>
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<td>Projector and screen</td>
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<td>Speakers</td>
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<tr>
<td>Wireless presenter device and laser pointer</td>
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<td>Item</td>
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<tr>
<td>Timer</td>
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<tr>
<td>Flip chart paper (self-adhesive strip)</td>
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<tr>
<td>Easel</td>
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<tr>
<td>Painter’s tape (do not use masking tape)</td>
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<tr>
<td>Pens, pencils, note paper, highlighters, self-adhesive notes, page markers, index cards (each table)</td>
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<tr>
<td>Name tags and table tents</td>
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<tr>
<td>Black light</td>
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<tr>
<td>Glo-germ® solution</td>
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<tr>
<td>Two spatulas or other kitchen utensils</td>
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<tr>
<td>Ingredient statement printouts (see Appendix)</td>
<td></td>
<td></td>
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<tr>
<td>Manager’s Corner: Food Allergies (one per participant)</td>
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<tr>
<td>found at <a href="http://www.theicn.org/foodsafety">www.theicn.org/foodsafety</a></td>
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<tr>
<td>Managing Food Allergies in Schools folder (if out of print, fact sheets available at <a href="http://www.theicn.org/foodsafety">www.theicn.org/foodsafety</a>)</td>
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</tr>
</tbody>
</table>

These three handouts will need to be downloaded and printed from www.foodallergy.org

- **Recognize and Respond to Anaphylaxis:**

- **Food Allergy & Anaphylaxis Emergency Care Plan:**

- **Tips for Avoiding Your Allergen:**
### Key Terms

<table>
<thead>
<tr>
<th>Key Terms</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>504 Plan</td>
<td>A written document that contains the services to be provided to a child with a disability, to comply with provisions in Section 504 of the Rehabilitation Act (1973)</td>
</tr>
<tr>
<td>Allergen</td>
<td>Usually harmless substance in a food that can trigger an immune response in a person and cause an allergic reaction</td>
</tr>
<tr>
<td>Allergic Reaction</td>
<td>Immune system reacts to a usually harmless substance in a food</td>
</tr>
<tr>
<td>Americans with Disabilities Act (1990) (ADA)</td>
<td>Prohibits discrimination and ensures equal opportunity for Americans with disabilities</td>
</tr>
<tr>
<td>Anaphylaxis</td>
<td>A serious food allergic reaction that is rapid in onset and can cause death</td>
</tr>
<tr>
<td>Celiac Disease</td>
<td>An immune reaction only in the small intestines caused by eating gluten and managed with a strict gluten-free diet</td>
</tr>
<tr>
<td>Cross Contact</td>
<td>Occurs when an allergen is accidentally transferred from a food containing an allergen to a food or surface that does not contain an allergen</td>
</tr>
<tr>
<td>Cross Contamination</td>
<td>Occurs when microorganisms from different sources contaminate food during preparation or storage</td>
</tr>
<tr>
<td>Epinephrine</td>
<td>Medicine (adrenaline) used to treat a serious allergic reaction</td>
</tr>
<tr>
<td>Family Educational Rights and Privacy Act (1974) (FERPA)</td>
<td>Federal program that protects the privacy of information entered into a student’s record</td>
</tr>
<tr>
<td>Food Allergen Labeling and Consumer Protection Act (FALCPA)</td>
<td>Labeling law that mandates labels of foods containing the major eight allergens and declare the allergen in plain language</td>
</tr>
<tr>
<td>Food Allergy</td>
<td>An immune reaction to a food protein. Symptoms range from mild to severe; could be life-threatening</td>
</tr>
<tr>
<td>Food Intolerance</td>
<td>An abnormal response to eating; not life-threatening and does not involve the body’s immune system</td>
</tr>
<tr>
<td>Key Terms</td>
<td>Definition</td>
</tr>
<tr>
<td>-----------------------------------------------</td>
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<tr>
<td>Gluten</td>
<td>Protein found primarily in wheat, barley, and rye; can sometimes be found in oats</td>
</tr>
<tr>
<td>Gluten Intolerance</td>
<td>Food intolerance that can cause digestive problems after eating gluten</td>
</tr>
<tr>
<td>Health Insurance Portability and Accountability Act (1996) (HIPAA)</td>
<td>Federal program that requires all medical records in any form to be kept properly confidential</td>
</tr>
<tr>
<td>Individualized Education Plan (IEP)</td>
<td>A written document that contains the program of special education provided to a child with a disability; to comply with provisions Part B of the Individuals with Disabilities Education Act 2006 (IDEA)</td>
</tr>
<tr>
<td>Individuals with Disabilities Education Act (IDEA) (1975, 2006)</td>
<td>Federal law that requires a free and appropriate public education be provided for children with disabilities</td>
</tr>
<tr>
<td>Lactose Intolerance</td>
<td>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</td>
</tr>
<tr>
<td>Phenylketonuria (PKU)</td>
<td>A rare condition in which a person cannot properly break down the amino acid phenylalanine</td>
</tr>
<tr>
<td>Rehabilitation Act of 1973</td>
<td>Federal law that prohibits discrimination against qualified persons with disabilities</td>
</tr>
<tr>
<td>State Licensed Healthcare Professional</td>
<td>Individual who is authorized to write medical prescriptions under state law; examples include doctor, nurse practitioner, or physician's assistant</td>
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</tbody>
</table>
# Introduction

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Warm-Up</td>
<td>• Flip chart paper</td>
<td>40 minutes</td>
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<td>• Easel</td>
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<td></td>
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<td>• Markers</td>
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<td>• Table tents</td>
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<tr>
<td></td>
<td>Pre-Assessment</td>
<td>• Pre-Assessment</td>
<td>10 minutes</td>
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<td>• Pen or pencil</td>
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Introduction

SHOW SLIDE:  *Food Allergies for School Nutrition Directors*

**SAY:** Welcome to the *Food Allergies for School Nutrition Directors* course. ICN partners with the United States Department of Agriculture’s (USDA) Food and Nutrition Service (FNS) to provide training opportunities for child nutrition professionals on current issues such as food allergies.

SHOW SLIDE:  *Food Allergy Background*

**SAY:** According to the CDC’s *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 that affect an estimated 4% – 6% of children in the United States. Food allergies are a fairly common health concern, and the number of children diagnosed with food allergies is increasing. In 2007, three million children were reported to have a food allergy. Research indicated an 18% increase in the prevalence of food allergies from 1997–2007. The National Center of Health Statistics estimates that about 4 of every 100 children have some type of food allergy. Consequences of food allergies can be grave because they are associated with chronic conditions, such as asthma, and may even lead to death. A fatal reaction can occur with even a trace amount of an allergen. Using the same tongs or gloves to handle an allergen food, then a non-allergen food (cross contact) can cause a reaction. According to Allergic Living magazine, a student in Canada unfortunately died in 2003 due to an anaphylactic reaction believed to be caused by cross contact at school. She was allergic to dairy. It was believed she used tongs to get fries that had been used to serve poutine, the French Canadian accompaniment of gravy and melted cheese curds. This is why it is very important to have procedures in place to protect children with food allergies.

SHOW SLIDE:  *Logistics*

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

We are hosted today by (insert name of 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 session will last twelve (12) hours. If you have questions at any time, please write them on a sticky note and put them on the Bike Rack flip chart paper during the breaks. We will have a roundtable discussion at the end.

**DO:** Write “Bike Rack” on top of a piece of flip chart paper and put it on a far wall.

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

**SAY:** As we begin our program, let’s get to know each other.

SHOW SLIDE:  *Warm-Up Activity*
DO: **ACTIVITY: Warm-Up**

**Materials:**
- Flip chart paper
- Easel
- Markers
- Table tents

**Time:** 30 minutes (2 minutes of individual work, 10–15 minutes of mingling, and 10–15 minutes of debrief)

**Instructions:** Participants will fold their table tents in half and write their first name in large letters on one side. On the back side, the participants will list at least three food allergy challenges that are present in their school or school district. For about 5 minutes, participants will move around the room introducing themselves and sharing their list.

**SAY:** Please take your table tent and fold it in half. On one side, please write your name. On the other side, list at least three food allergy challenges that are present in your school or school district.

**DO:** Allow participants 2 minutes to do this independently.

**SAY:** Now for about 2 minutes, take your table tent with your list and move around the room to find someone you do not know or do not know well. Introduce yourself and share your list with this person, and then allow them to introduce themselves and share their list. After a couple of minutes, move on to another person to share your name and list.

**DO:** Allow 10–15 minutes of group mingling.

**Instructor’s Note:** If your class is larger than 25 people, it is suggested to skip everyone reading out to save time. Instead, ask participants to return to their seats and ask for some volunteered responses.

**SAY:** Okay, please return to your seats. Let’s quickly share your name and one similarity on your list.

**DO:** Take about 10–15 minutes to write the participants’ comments on the flip chart, putting a check mark beside duplicate comments.

**FEEDBACK:**
- There are a lot more students with food allergies.
- Food is served outside the cafeteria.
- Parents or guardians want us to ban a certain food to keep his/her child safe at school.
- Ensure employees are preventing cross contact.
We can see that our schools have more food allergy issues than ever before. Today we will discuss food allergies (definitions, symptoms, and treatment), reading ingredient statements, preparing food for students with food allergies, understanding the laws related to food allergies, promoting food allergy awareness, and creating a food allergy management plan. At the end of this training, you will either have the outline of a food allergy management plan or have the opportunity to strengthen your existing plan.

Please refer to your workbooks as I cover the topics for today. Our lessons today include:
1. All About Food Allergies
2. Reading Labels for Allergens
3. Avoiding Cross Contact
4. Accommodating Food Allergies in Schools
5. Food Allergy Management Plan

Food allergies are considered a growing public health risk, so managing food allergies in your school will continue to be a priority focus area.

Pass the pre-assessment out to participants. Read the instructions for writing an identifier. Allow time for participants to take the pre-assessment, and then pick them back up.

I am going to pass out the pre-assessment. Please do not write your name on the assessment, instead write some kind of identifier in the top right corner. Identifiers can be the last four (4) digits of your phone number, a favorite word, etc. Please remember what your identifier is to use on your post-assessment. Answer the questions to the best of your ability. We will go over the content during the session, and we will review the answers at the end of our session. This activity should take about ten (10) minutes and is meant to be done individually.

As a filler, encourage participants who have completed the pre-assessment (while waiting for others to finish) to review the list of key terms that will be used during this training to familiarize themselves with some of the words and phrases that will be used. They should also review the professional standards and training objectives if time permits.
## Lesson 1: All About Food Allergies

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
</table>
| Evaluate the impact that an allergic reaction incident may have on a school. | The Power of a Story | • *Caitlin Remembered* video  
• Laptop speakers  
• Projector  
• Reflection and Impact worksheet  
• Flip chart paper  
• Markers | 35 minutes |
| Describe a food allergy, its symptoms, and treatment methods. | 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  
• Flip chart paper  
• Markers | 45 minutes |
| Identify the eight major food allergens. |  | • Eight Major Allergens handout  
• FARE Tips for Avoiding Your Allergen handout | 10 minutes |
| Distinguish between food allergy and food intolerance. |  | • Food Allergies and Food Intolerances handout  
• CDC Guidelines for Managing Food Allergies handout  
• Food Allergy Management Plan Outline | 25 minutes |
Lesson 1: All About Food Allergies

SHOW SLIDE: Lesson 1: All About Food Allergies

SAY: The first lesson is learning “All About Food Allergies.” We will go over the background, symptoms, and treatment of food allergies and food intolerances.

Our goals for this section are to learn about food allergies, identify the eight major food allergies, and understand the difference between food allergies and food intolerances. Later in the training, we will discuss how to accommodate students with food-related disabilities, such as a food allergy or a food intolerance. Even though there are differences between the two, both food-related allergies and intolerances have the potential to be considered a disability.

Before we get started, we are going to watch a video about a student with a food allergy. You do not need to write anything, 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 handout
• Flip chart paper (one per group)
• Markers

Time: 8-minute video, 1–2 minutes individual reflection, 5–10 minutes of group work, 10–15 minutes class discussion

Instructions: Play the Caitlin Remembered video. After the video, participants will take 1 minute to write their thoughts on the Reflection and Impact handout. Break the participants into five groups. The groups will discuss their thoughts on the video and write a summary of their responses on flip chart paper. The groups will then share their summary.

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

SHOW SLIDE: The Power of a Story Activity

SAY: I know this was a hard video to watch, and it has probably left you with some emotional feelings. 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 reflect on how you felt after watching the video.

DO: Allow 1–2 minutes for participants to self-reflect and write.

SAY: I am going to break you into 5 groups. Take about 1–2 minutes to share within your group your personal reflections. After your discussion, write a summary of what your group collectively took away from the video on the flip chart paper. Also, determine at least one thing you will do differently related to food allergies in the future.

DO: Have the participants break into groups of five. Allow 5–10 minutes for group work.

SAY: Now please choose a spokesperson to share what your group collectively took away from the video.

DO: Allow 10–15 minutes for class discussion. Write group reflections and action points on a flip chart.

Reflection and Impact

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

FEEL How do I feel from what I’ve just seen in the video?

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?

SAY: Please know that the video you just watched was a dramatization; no child actually died. Although this was staged, not following the procedures put into place can have real consequences. The children 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: We are now going to discuss more about food allergies. Please follow along on the Food Allergy Fact Sheet in your Participant’s Workbook.
Food Allergy Fact Sheet

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

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

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

How might a child describe an allergic reaction?

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

What is anaphylaxis?
A severe allergic reaction with rapid onset and may cause death

What are the treatment methods?

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

How to avoid an allergic reaction?

- Total avoidance of allergen food protein
SAY: A food allergy is defined as an immune-mediated adverse reaction to a food protein which can cause a life threatening response. In allergic individuals, certain foods can trigger the immune system to develop an antibody against the allergen (food protein). Every time that person consumes that allergen, it triggers a variety of 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 is in the beginning of the Instructor’s Manual and on the landing page for the training.

SHOW SLIDE: Allergic Symptoms

SAY: As you can see on the FARE Recognize and Respond to Anaphylaxis poster, there are a variety of symptoms for food allergies. One or more food allergic symptoms generally occur within minutes or up to two (2) hours after eating the food and can be mild to severe in nature. Occasionally an allergic reaction can occur after two hours. More than one symptom often presents itself.

A mild symptom could be hives (a reddish, swollen, itchy area on the skin), nausea or 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.

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 the awareness of food allergies with all members of the school community could prevent a tragedy.

Perhaps you have heard about the theory that an allergic reaction could occur from smelling or inhaling the food. These conditions could occur but are rare. The most common way for an allergic reaction to occur is by ingesting the food.

SHOW SLIDE: How a Child Might Describe Symptoms

SAY: Here are some ways a child might describe the symptoms of an allergic reaction. Remember, symptoms of a reaction can be mild to severe.

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

The person the child tells this information to will need to determine the next steps to care for the child. If you are the person the child is speaking to, you will have to decide if it is necessary to call 911.

SHOW SLIDE: **Anaphylaxis**

**SAY:** We'll now discuss anaphylaxis, a serious life-threatening reaction, and what treatment is needed.

Anaphylaxis is a severe allergic reaction known to be caused by food, insect venom, medications, and latex. Anaphylaxis onset is rapid and may cause death.

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 used to deliver a measured dose (or doses) of epinephrine. Trade names for this device include EpiPen®, Adrenaclick®, and Auvi-Q® (Allerject® in Canada).

**DO:** **ACTIVITY: Epinephrine Auto-Injectors Demonstration**

**Materials:**
• Sample trainer epinephrine auto-injectors of various brands
• FARE Food Allergy and Anaphylaxis Emergency Care Plan handout

**Time:** 5 minutes

**Instructions:** Pass around the sample auto-injector for each person. Use the FARE Food Allergy and Anaphylaxis Emergency Care Plan handout to demonstrate how to administer an auto-injector.

**Instructor’s Note:** Be familiar with the epinephrine auto-injector trainer and how to demonstrate them. Read the instructions before showing them as each brand may have different instructions.

**SAY:** I am going to pass around an epinephrine auto-injector trainer for you to see; note there are no medicine or needles in these.

**DO:** Refer participants to the FARE Food Allergy and Anaphylaxis Emergency Care Plan handout. Walk participants through a demonstration with the auto-injector trainers.

**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 beginning of the Instructor’s Manual and on the landing page for the training.

**SAY:** The FARE Food Allergy and Anaphylaxis Emergency Care Plan handout shows how to use different types of epinephrine auto-injectors. These trainers have no needles or medicine. General steps would be to remove the cap and stab the medicine into the thigh. You want to avoid seams in clothes and hold for at least 10 seconds. It is advised to massage the thigh afterward.
Please be aware, this demonstration was just to show you how the auto-injectors work. This demonstration does not qualify as medical training and does not qualify you to administer an epinephrine auto-injector.

**DO:** Collect all the sample auto-injectors.

**SHOW SLIDE:** **FARE Resources**

**SAY:** Please get the FARE Recognize and Response to Anaphylaxis poster and the Food Allergy and Anaphylaxis Emergency Care Plan handout from the resources you were provided. The poster provides quick resource for what to do in a suspected allergic reaction. The Emergency Care handout is another tool from FARE which is recommended for each child with a known food allergy. This tool supports the CDC’s recommendation of daily management of food allergies in individual children. There should be a Food Allergy Management Plan for each child with food allergies.

The mission of the Food Allergy Research & Education (FARE) is “to create a healthier, safer, and more inclusive world for those living with food allergies.” FARE is the nation’s leading organization dedicated to food allergy research, education, advocacy, and awareness, and it’s the world’s largest private source of funding for food allergy research. They are recognized as a leader in providing food allergy resources and are listed in the resource section of your workbook. The direct links for the specific FARE resources are at the bottom of each handout.

**DO:** **ACTIVITY:** Food Emergency Questions

**Materials:**
- Food Allergy Emergency worksheet
- Flip chart paper
- Markers

**Time:** 15 minutes

**Instructions:** In the following portion of the Instructor’s Manual, the trainer will ask several questions. Ask participants to follow along on the Food Allergy Emergency worksheet and write their answers as it pertains to their school in the notes section.

**SAY:** Please turn in your workbook to the Food Allergy Emergency worksheet. I will ask a series of questions as we discuss handling a food allergy emergency. In the “Notes” section, write some answers or ideas for your school as we discuss the questions as a class.
### Food Allergy Emergency

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

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

DO: Write the participants’ responses on the flip chart.

FEEDBACK:
- Do you know how epinephrine is administered?
  - By injection
- Who can administer epinephrine?
  - The school nurse, the child him/herself
- Where would you get epinephrine if you were in the presence of a child having an allergic reaction?
  - The school nurse, emergency responders

SAY: In the treatment of anaphylaxis with epinephrine, quick administration is key. A delay can be deadly. A serious food allergic reaction is an EMERGENCY. Call 911. Do not hesitate when anaphylaxis is suspected. Notify the emergency medical service that anaphylaxis is suspected so they will bring epinephrine. An expert panel held by the CDC revealed that state laws vary and not all EMS providers carry epinephrine.

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 so they will be available in a school in case they are needed.

When administering the dose of medicine, inject in the upper thigh, right through the person’s clothes. Avoid the seams of the pants as it can prevent the needle from getting into the muscle. Hold the auto-injector for about 5–10 seconds depending on the auto-injector to make sure the medicine is administered. The medicine is intended to slow or reverse the symptoms of the allergic reaction.

ASK: For your school:
- Does the child with a known life-threatening food allergy carry an auto-injector?
- Is the child’s auto-injector in the nurse’s office? Is the auto-injector available if the nurse is not in her/his office?
- What if the child is having a first time allergic reaction and there is no prescription auto-injector available?

DO: Allow participants to share responses.
SAY: Auto-injectors have an expiration date, so they have to be thrown away after the expiration and a new prescription has to be filled. Discuss with a medical authority how to dispose of expired epinephrine auto-injectors.

ASK: Have any of you had experience with administering epinephrine? If so, would you care to share with the group?

DO: Allow participants to share stories.

SAY: Thank you for sharing. There are many questions that need to be answered with handling an allergic reaction and epinephrine administration. I’ll share a few of those questions with you now.

SHOW SLIDE: Emergency Reaction Questions

ASK:
- Do you need to be trained to administer an auto-injector? Who is trained in your school?
- What if you inject the person and they are not really having an allergic reaction?
- Do substitutes know how to respond? Volunteers?
- Do the phones near you get an outside line to call 911?
- Will local EMTs have epinephrine available for use when they arrive?

SAY: These questions emphasize the need for being prepared. All of these questions should be asked and answered before anyone has an allergic reaction in your school.

Remember, quick administration of epinephrine is key. A delay can be deadly. Call 911 when a severe reaction is suspected. The person who had the reaction will need follow-up care and observation. Symptoms can improve or disappear, but a person may have a second reaction that could be worse than the first.

OBJECTIVE: Identify the eight major food allergens.

SHOW SLIDE: The Eight Major Food Allergens

SAY: Please turn in your workbook to the Eight Major Allergens handout. There are eight (8) food allergens that account for 90% of all food allergic reactions in the United States:

1. Milk
2. Eggs
3. Peanuts
4. Tree nuts (e.g. walnuts, almonds, cashews, pistachios, and pecans)
5. Wheat
6. Soy
7. Fish
8. Crustacean shellfish (e.g. shrimp, lobster, and crab)

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

**ASK:** Do you have any students in your school with one or more of the eight major allergens?

**DO:** Allow participants time to answer.

### Eight Major Allergens

<table>
<thead>
<tr>
<th>MILK</th>
<th>EGGS</th>
</tr>
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<tbody>
<tr>
<td><img src="image" alt="Milk" /></td>
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<th>PEANUTS</th>
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<td><img src="image" alt="Peanuts" /></td>
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<table>
<thead>
<tr>
<th>TREE NUTS</th>
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<tbody>
<tr>
<td>(e.g. walnuts, almonds, cashews, pistachios, and pecans)</td>
<td><img src="image" alt="Soy" /></td>
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<table>
<thead>
<tr>
<th>FISH</th>
<th>CRUSTACEAN SHELLFISH</th>
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<tbody>
<tr>
<td><img src="image" alt="Fish" /></td>
<td>(e.g. crab, lobster, and shrimp)</td>
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</table>
DO: Pass out 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 beginning of the Instructor’s Manual and on the landing page for the training.*

SAY: The FARE Tips for Avoiding Your Allergen handout shows common foods where the eight major allergens can be found.

ASK: What are some food items that you have found had one of the eight major allergens that you did not expect to have one?

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

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

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

Next, we are going to differentiate between a food allergy and a food intolerance.

**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 the differences and similarities of food allergies and food intolerances which we are about to discuss.
Food Allergies and Food Inttolerances

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

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

**SAY:** A food intolerance is an abnormal response to a food which usually involves the gastrointestinal system but not the immune system. Eliminating the food will eliminate the symptoms. The treatment is determined between a state licensed healthcare professional and the patient. Common food intolerances that you might hear about are gluten, monosodium glutamate (MSG), and lactose (aka milk intolerance). Food intolerances do not cause immediate life-threatening reactions. However, food intolerances may still be considered a disability on a case by case basis by a state licensed healthcare professional, so you may have to make accommodations to school meals. Some children may be able to ingest some food related to their food intolerance, such as yogurt for a milk intolerance, but it is up to the state licensed healthcare professional to prescribe such allowances.

A reaction to a food intolerance can be similar to, and is often confused with, a food allergic reaction. This is because they may have similar symptoms such as nausea, diarrhea, and/or vomiting.

**ASK:** What food intolerances are you dealing with in your school?
DO: Allow time for participants to respond.

SHOW SLIDE: **Celiac Disease**

**SAY:** Celiac disease is unique; it is a food intolerance that does involve the immune system but only in the small intestine. The adverse reaction occurs when someone with celiac disease eats gluten, a protein found in wheat, barley, and rye. Oats, although they do not naturally contain gluten, can sometimes be unsafe due to cross contact or cross pollination. There is no cure for celiac disease, so a strict gluten-free diet is followed to manage the symptoms and promote intestinal health. Celiac disease can have significant long-term health effects, and it can also have some significant acute neurological effects. Celiac disease is always considered a disability under the Americans with Disabilities Act (ADA) and must be accommodated, which we will discuss later. A note from a state licensed healthcare professional is still required to make these accommodations.

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

**DO:** Allow time for participants to respond.

**SAY:** Gluten-free products are becoming more available, but they are typically higher priced and considered a specialty food. The purchase of gluten-free bread and other gluten-free foods is an appropriate use of school nutrition program funds. Careful label reading is needed to assure “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. Turn up your creativity with menu planning and find foods that are naturally gluten-free. They can also fit into the school nutrition meal pattern and may be more affordable than gluten-free products.

**DO:** Refer participants to the *Managing Food Allergies in Schools* folder.

**SAY:** ICN provides the *Managing Food Allergies in Schools* folder for free. It holds the Food Allergy Fact Sheets which are also available for free at www.theicn.org/foodsafety. One of the fact sheets is the Wheat Allergies Fact Sheet which provides common foods that contain wheat as well as possible substitutes for them. There is a fact sheet for each of the eight major allergens.

SHOW SLIDE: **Food Allergy Management Plan**

**SAY:** It is important to create a food allergy management plan for your school or schools. You are not alone in creating and implementing a food allergy management plan. Check with your state Department of Health to see if they already have forms you can use.

The Centers for Disease Control and Prevention, *Voluntary Guidelines for Managing Food Allergies* recommends for each school to develop a food allergy management plan with five (5) priority areas. Please turn to the *CDC Guidelines for Managing Food Allergies* handout. As you can see on this handout, these five priority areas are:

1. Ensure the daily management of food allergies in individual children.
2. Prepare for food allergy emergencies.
3. Provide professional development on food allergies for staff members.
4. Educate children and family members about food allergies.
5. Create and maintain a healthy and safe educational environment.
### CDC Guidelines for Managing Food Allergies

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

1. **Ensure the daily management of food allergies in individual children.**
   - Identify children with food allergies.
   - Develop a plan to manage and reduce the risk of food allergy reactions in individual children.
   - Help students manage their own food allergies.

2. **Prepare for food allergy emergencies.**
   - Set up communication systems that are easy to use.
   - Make sure staff can get to epinephrine auto-injectors quickly and easily.
   - Make sure that epinephrine is used when needed and someone immediately contacts emergency medical services.
   - Identify the role of each staff member in an emergency.
   - Prepare for food allergy reactions in children without a prior history of food allergies.
   - Document the response to a food allergy emergency.

3. **Provide professional development on food allergies for staff members.**
   - Provide general training on food allergies for all staff.
   - Provide in-depth training for staff who have frequent contact with children with food allergies.
   - Provide specialized training for staff who are responsible for managing the health of children with food allergies on a daily basis.

4. **Educate children and family members about food allergies.**
   - Teach all children about food allergies.
   - Teach all parents or guardians and families about food allergies.

5. **Create and maintain a healthy and safe educational environment.**
   - Create an environment that is as safe as possible from exposure to food allergens.
   - Develop food-handling policies and procedures to prevent food allergens from unintentionally contacting another food.
   - Make outside groups aware of food allergy policies and rules when they use school or ECE program facilities before or after hours.
   - Create a positive psychosocial climate.

ASK: Do any of your schools have an allergy management plan? If so, are any of these five (5) areas in your plan?

DO: Allow some time for responses.

SAY: You will be outlining a food allergy management plan for your school as we go through the training today. At the end of each lesson, you will have the opportunity to complete and strengthen your plan.

SHOW SLIDE: **Food Allergy Management Plan Outline – Lesson 1**

DO: **ACTIVITY: Food Allergy Management Plan Outline – Lesson 1**

Materials:
- Food Allergy Management Plan Outline

Time: 10 minutes

Instructions: Tell participants to get the **Food Allergy Management Plan Outline**. Give participants 10 minutes to fill in **Food Allergy Emergency Preparedness** section of the outline.

SAY: Please get the **Food Allergy Management Plan Outline**. Find the **Food Allergy Emergency Preparedness** section. Fill out these sections according to your school; if you have multiple schools, choose one to focus on.

---

**Food Allergy Management Plan Outline**

<table>
<thead>
<tr>
<th>Task</th>
<th>Stakeholders Involved</th>
<th>Roles</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Emergency care plan</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• For child with a known food allergy</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• For unknown allergen</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Emergency procedures</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Epinephrine auto-injector storage</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Training to administer medicine</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
SHOW SLIDE:  Lesson 1 Review

SAY: We are now finished with 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 eight major allergens.
• Distinguish between food allergy and food intolerance.

ASK: What questions do you have before we proceed?
## Lesson 2: Reading Labels for Allergens

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
</table>
| Demonstrate how to find the eight major food allergens in the ingredient statement on the food label. | Hide and Seek Label Reading       | • Reading Ingredient Statements for Food Allergens handout  
• FARE Tips for Avoiding Your Allergen handout  
• Hide and Seek Label Reading worksheet  
• Ingredient statement printouts                                                                 | 35 minutes|
| Describe how to find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods. |                                   | • Tips for Managing Food Allergies in Bulk Items and USDA Foods handout                                                                     | 20 minutes|
| Outline methods for managing food labels.                                 | Strategies for Managing Food Labels | • *Managing Allergies in a School* video  
• Speakers  
• Projector  
• Flip chart paper  
• Markers  
• Strategies for Managing Food Labels worksheet  
• Food Allergy Management Plan Outline                                                                 | 50 minutes|
Lesson 2: Reading Food Labels for Allergens

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

SAY: Now we will begin Lesson 2: Reading Food Labels for Allergens.

OBJECTIVE: Demonstrate how to find the eight major allergens in the ingredient statement on the food label.

SHOW SLIDE: **Reading Ingredient Statements**

SAY: People with food allergies have to make wise food choices through careful label reading. They need to ask questions. They need to use careful food preparation and cleanup procedures. They check every label, every time.

Allergens are found in many foods. Manufacturers are required to list the ingredients and the presence of the eight major food allergens on the label. There is an art to reading labels, and you will find that parents or guardians of children with food allergies are quite skilled at reading labels.

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

SAY: Please turn in your workbook to the Reading Ingredient Statements for Food Allergens handout. This handout provides information about the Food Allergen Labeling and Consumer Protection Act and how to find the eight major food allergens on an ingredient statement.

---

Reading Ingredient Statements for Food Allergens

**Food Allergen Labeling**

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

<table>
<thead>
<tr>
<th>Eight Major Allergens</th>
</tr>
</thead>
<tbody>
<tr>
<td>Egg</td>
</tr>
<tr>
<td>Fish</td>
</tr>
<tr>
<td>Peanuts</td>
</tr>
<tr>
<td>Milk</td>
</tr>
<tr>
<td>Shellfish</td>
</tr>
<tr>
<td>Soy</td>
</tr>
<tr>
<td>Tree nuts</td>
</tr>
<tr>
<td>Wheat</td>
</tr>
</tbody>
</table>
There are specifics on where and how the information is to be presented. The food ingredient MUST be in the ingredient in parenthesis following the ingredient or written as the usual name of the major food allergen or listed after the ingredient list by stating product “Contains” the particular allergen.

---

**“Contains” followed by the name**
Example: “Contains: milk and wheat”

**Parenthetical statement or usual name in the list of ingredients**
Example: “wheat flour and albumin (egg)”

---

**Precautionary Labeling**

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

---

**“May Contain” statement**
Example: “May contain traces of peanuts”

**“Made on Equipment”**
Example: “Made on equipment that makes products containing eggs and tree nuts”

**“Processed in Facilities”**
Example: “Processed in facilities that also processing wheat.”

---

**Reading Ingredient Statements**

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

---

**Holding Labels**

It is recommended that labels of all products served be kept for 24 hours as a precaution so the label is available in case someone has an allergic reaction. Unlike a foodborne illness outbreak where the outbreak can occur days after a food is served, an allergic reaction will happen the day of service. If food is going to be served as leftovers or reused in another recipe, the label should be kept until all product is either consumed or disposed. Keeping a label library is a common practice; some keep the actual label, some schools can scan the label.
SAY: The Food Allergen Labeling and Consumer Protection Act is a Federal law that became effective January 2006. It mandates that the labels of foods containing the eight major food allergens be declared in plain language on the product. There are specifics on where and how the information is to be presented. The food ingredient MUST be in the ingredient list or listed after the ingredient list by stating product “Contains” the particular allergen. The two examples are on the handout.

“Contains” followed by the name
Example: “Contains: milk and wheat”

Parenthetical statement or usual name in the list of ingredients
Example: “wheat flour and albumin (egg)”

SHOW SLIDE: Label Samples

SAY: These two pictures show the different methods of labeling. The one ingredient label uses the “Contains” statement and the other label uses the parenthesis method.

Unfortunately, sometimes a food may be put onto the market with undeclared allergens. Recalls can be issued for food labels that do not declare one of the eight major allergens in food. According to a recent article in Food Engineering Magazine, the Food Industry Counsel LLC determined that almost 50% of recalls (218 out of 439 recalls) in 2017 were due to undeclared allergens. Food recalls due to undeclared allergens were higher than any other type of recall.

SHOW SLIDE: Recall Notifications

SAY: Food recalls are an important part of safety for food allergies. Your district is encouraged to subscribe to an automatic notification service to alert you to recalls. You can sign up for the notification service at www.foodsafety.gov. The notifications can arrive by email, phone, or both. Another site is www.recalls.gov, but includes both food and medical recalls. USDA has an app called USDA Foodkeeper which has an option to provide recall notifications. You may have a product that is being recalled, and you would want to remove the product from your shelves.

ASK:
• Are any of you already signed up for the notification service?
• What would happen if you were on vacation?
• Have you considered having a staff member receive the alerts, too?

FEEDBACK: Another staff member also receiving alerts

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

FEEDBACK:
• Checking inventory for recalled product
• Checking with distributor/manufacturer to see if you received recalled product
• Putting recalled product in a certain place in their respective areas – dry storage, fridge, or freezer – and marking as **DO NOT USE – RECALLED PRODUCT**

**SAY:** ICN has a sample SOP called *Handling a Food Recall* that you can adapt and use in your school if you do not already have a food recall SOP or want to update your existing plan.

**SHOW SLIDE:** *Precautionary Labeling*

**SAY:** There is another type of allergy labeling called Precautionary Labeling. This type of labeling is **NOT** covered in the *Food Allergen Labeling and Consumer Protection Act*, so it varies widely from manufacturer to manufacturer.

Precautionary labeling may have wording such as “May Contain,” “Made on Equipment,” and “Processed in Facilities.” Examples for 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.”

Products labeled with precautionary labeling are not safe for people with known food allergies.

**SHOW SLIDE:** *Hide and Seek Label Reading Activity*

**SAY:** Please retrieve the FARE Tips for Avoiding Your Allergen handout for how to read a food label to determine if it contains one of the eight major allergens.

**DO:** **ACTIVITY:** Hide and Seek Label Reading

**Materials:**
- FARE Tips for Avoiding Your Allergen handout
- Hide and Seek Label Reading worksheet
- Ingredient statement printouts

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

**Instructions:** Divide participants into six (6) groups. Each group starts at a label on the wall. The groups will have 1 minute to read the ingredient statement and determine the answer to the questions on the *Hide and Seek Label Reading* worksheet related to each label. After a minute, the groups will rotate to the next label. Participant can use the FARE Tips for Avoiding Your Allergen handout for help. After all groups have had a chance to read the labels, have the groups return to their first label and read out the answers. Then have groups return to their seats and share observations about reading labels.

**SAY:** Now, please 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 groups, and you will have 1 minute to look at a label. Then, you will rotate to the next one. Read each of the label ingredient statements and answer the questions corresponding to the label on the *Hide and Seek Label Reading* worksheet. Grab the FARE Tips for Avoiding Your Allergen handout that has been provided for you for assistance.
**DO:** Divide participants into six groups. Allow 5–8 minutes for participants to complete the activity and 10 minutes report back to the class.

**SAY:** Please return to your original label and select a spokesperson from your group to share your answer for that label.

---

**Hide and Seek Label Reading Answers**

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

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

---

**Questions for Label A**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Which allergens are listed in Label A?</td>
<td>Milk</td>
</tr>
<tr>
<td>Does the product label meet the allergen requirements of the labeling law?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**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**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Which ingredients in the statement cause the manufacturer to label the product: CONTAINS MILK?</td>
<td>Buttermilk</td>
</tr>
<tr>
<td>Can a child known to have a wheat allergy have this product?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Label B**

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

CONTAINS: MILK

---

**Questions for Label C**

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Would you prepare and serve this product to a child with an egg allergy?</td>
<td>No, risk of cross contact with eggs.</td>
</tr>
<tr>
<td>Does this statement meet the requirements of the labeling law?</td>
<td>No, it does not declare the allergen wheat correctly. Statement should be in “Contains”, in parenthesis, or in usual name.</td>
</tr>
</tbody>
</table>

**Label C**

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

### Questions for Label D

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Can this product be served to a child with a known peanut allergy?</td>
<td>Yes, it is stated that it is made in a peanut and tree nut free facility.</td>
</tr>
<tr>
<td>Can this product be served to a child with known egg, wheat, and soy allergies?</td>
<td>No, there is a risk of cross contact with soy.</td>
</tr>
</tbody>
</table>

**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

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>How many of the eight (8) major allergens are in this product? List the allergens.</td>
<td>4: soy, milk, fish, wheat</td>
</tr>
<tr>
<td>Can this product be served to a child with shellfish allergies?</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**Label E**

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

### Questions for Label F

<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>Which allergen is listed in the ingredient statement but is not listed in the contains statement?</td>
<td>Soy</td>
</tr>
<tr>
<td>Would the missing information in the contains statement be enough for the product to be recalled?</td>
<td>Yes, it is one of the major eight and is required to be declared.</td>
</tr>
</tbody>
</table>

**Label F**

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

ALLERGIES: 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 carefully read the label.

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

SHOW SLIDE: Managing Other Allergens

SAY: We will now discuss allergens that are not among the eight major, when they are in bulk items, and in USDA Foods. We know from earlier information presented in today’s training that eight foods account for 90% of food allergic reactions; that leaves 10% of food allergic reactions caused by other foods. According to the CDC’s Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs, there are more than 170 foods that can cause an allergic reaction. For instance, in Canada there are 11 foods on their priority allergen list: the same as the United States eight major allergens plus sulfites, mustard, and sesame. In the European Union there are 14 which include Canada’s 11 plus celery, mollusks, and lupin (a type of bean).

ASK: What foods are your students allergic to that are not in the eight major?

FEEDBACK: Strawberries, sesame, mustard, and sulfites

SAY: There are some allergens that may not be listed on the ingredient statement such as cinnamon or mustard. Different spices or herbs may be listed as just “spices” in the ingredient statement. If you have a child with food allergies to a spice, it is important to contact the manufacturer to determine what spices are included in a food.

SHOW SLIDE: Managing Allergens in Bulk Items

SAY: Please turn in your Participant’s Workbook to the Tips for Managing Food Allergies in Bulk Items and USDA Foods handout. This handout has tips for managing food allergies in these items. We are going to discuss some strategies for determining allergies in bulk items and USDA Foods.

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

1. Obtain the ingredient statement for the bulk product, and identify any known allergens; retain the labeling on bulk packages.
2. Develop a Standard Operating Procedure for how to handle bulk products. Include procedures for:
   - How many lots of bulk can be mixed in a storage container?
   - How to assure what is added has the same ingredient statement?
   - How product from the bulk container is scooped out during use?
   - How to prevent cross contact from utensils?
3. Clean the bulk storage container thoroughly to remove allergen residue before the container is used for a different product.

4. Contact the manufacturer for the ingredient statement if there is any doubt of the ingredients of bulk product.

Cross contact, which we will discuss further in the next lesson, is the accidental transfer of an allergen to an allergy-free food or surface. For example, if someone uses the flour scoop to scoop out some sugar, that would be cross contact.

**ASK:** Will a couple of you share your best practices of handling bulk products while managing for allergies?

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

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

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

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

**SAY:** USDA Foods should be addressed similarly to other institutional size commercial products; they have the same labeling requirements. USDA Foods and other supplier brands may change throughout the school year so label reading is important. When determining if a product is free of an allergen, use the actual label and read the ingredient statement. Do not rely on USDA fact sheets.

The process of managing food allergens demands time, attention, and rigorous procedures. Make sure your employees have time to follow these procedures. Build time into their daily or weekly schedule.

---

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

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

- Read the ingredient labels of all packages to verify the absence of allergens.
- Save or copy/scan package labels to include the ingredient list, allergen statements, and lot and run coding.

ASK: Are there any questions?

OBJECTIVE: Outline methods for managing food labels.

SHOW SLIDE: Strategies to Manage Food Labels

SAY: We will now further discuss some strategies used to manage labels and ingredient lists.

ASK:
- Who reads labels for allergens?
- How often do you read labels for allergens?
- Can you get ingredient statement information before you order products?

DO: Write responses on the flip chart.

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.

I will be asking you a series of questions that I’d like you to think about your process.

ASK:
- Do you keep product labels?
- How do you keep ingredient information for ‘foodservice packs’ where the labels are printed on the case which is thrown away after stocking the shelves?
- Where are labels stored, and who maintains the label list?

DO: Allow participants to respond.

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

**SAY:** There will be times when people ask you for food allergy labeling information. Some of the requests may come from the school nurse, parents or guardians, or students.

**ASK:**
- Would a couple of you care to share a time that you were asked for allergy label information?
- Did you have the information requested?

**DO:** Allow participants to respond.

**SAY:** Electronic records would be helpful so you can share the information on the district’s website, prepare handouts, or support a training for your staff or parents or guardians. One of the conditions of purchasing products from a supplier or through a cooperative may be the requirement for ingredient information to be supplied electronically.

If you communicate the school’s food allergy plan, families will understand what is being done to protect their child. Consider periodic communications about food allergies to let everyone know:

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

SHOW SLIDE: *Strategies for Managing Food Labels Activity*

**DO:** **ACTIVITY:** Strategies for Managing Food Labels

**Materials:**
- *Managing Allergies in a School – Reading and Managing Labels* video
- Laptop speakers
- Projector
- Flip chart
- Markers
- *Strategies for Managing Food Labels* worksheet

**Time:** 3-minute video, 5–8 minutes of individual work, 10 minutes of class discussion

**Instructions:** Play video. Allow participants 5–8 minutes to fill out the *Strategies for Managing Food Labels* worksheet. As a class, discuss strategies for managing food labels at schools.

**SAY:** We are going to watch a short video clip about reading labels.

**DO:** Press play on slide to watch clip.
SAY: We have just seen how a school nutrition director handles food labels that are from bulk items or USDA Foods in her school. Please turn in your workbook to Strategies for Managing Food Labels worksheet. Using the information presented in this lesson, answer the questions on the worksheet about different methods and strategies for managing labels.

DO: Allow participants 5–8 minutes to write down their thoughts.

Strategies for Managing Food Labels

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

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

How am I currently managing food labels at my school?

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

ASK: Would anyone like to share their current plan for managing food labels?

FEEDBACK:
• Create a binder to store labels.
• Read food labels before using food item.
• Use standardized recipes.
• Don’t serve food to a child with allergies if you are unsure if there is an allergen present in the food.
• Call the manufacturer if you are unsure if an allergen is present.

DO: Allow participants 10 minutes to respond. Write participants tips on a flip chart.

ASK: Did you see or hear some tips that you plan to implement when you return to your school?
DO: Allow participants 5 minutes to respond. Write participants tips on a flip chart.

SHOW SLIDE: *Food Allergy Management Plan Outline – Lesson 2*

DO: **ACTIVITY:** *Food Allergy Management Plan Outline – Lesson 2*

**Materials:**
- Food Allergy Management Plan Outline

**Time:** 10 minutes

**Instructions:** Tell participants to get the *Food Allergy Management Plan Outline*. Give participants 10 minutes to fill in *Staff Training on Food Allergies and Daily Management of Food Allergies* sections of the outline.

**SAY:** Please get the *Food Allergy Management Plan Outline*. Find the *Staff Training on Food Allergies and Daily Management of Food Allergies* sections. Fill out these sections according to your school; if you have multiple schools, choose one to focus on.
### Food Allergy Management Plan Outline

#### Daily Management of Food Allergies

<table>
<thead>
<tr>
<th>Task</th>
<th>Stakeholders Involved</th>
<th>Roles</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>504 and IEP meetings</td>
<td></td>
<td></td>
<td></td>
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<td>• Storing student information</td>
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<td>Accommodating children with disabilities</td>
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<td>Managing food labels</td>
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<td>• Reading food labels for eight major allergens</td>
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<td>• Keep ingredient statements for 24 hours</td>
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<td>Prepare and serve food safely</td>
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<td>• Eliminate risks of cross contact</td>
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<td>• Remove allergen residue from hard surfaces</td>
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### Staff Training on Food Allergies

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<th>Task</th>
<th>Stakeholders Involved</th>
<th>Roles</th>
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<td>Reading Labels</td>
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<td>• Avoiding cross contact</td>
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<td>Customer Service/Student Privacy</td>
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SHOW SLIDE:  *Lesson 2 Review*

**SAY:** We are now finished with our second lesson – Reading Labels for Allergens.

We have covered how to:

- Find the eight major allergens in the ingredient statement on the food label.
- Find allergens in the ingredient statement on the food label that are not among the eight major, are in bulk items, or are in USDA Foods.
- Outline methods for managing food labels.

**ASK:** What questions do you have before we proceed?
Lesson 3: Avoiding Cross Contact

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
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| Explain cross contact. | Where Are the Allergens? | • Glo-germ®  
• 2 spatulas  
• Black light  
• Cleaning and Sanitizing Fact Sheet | 15 minutes |
| Examine how cross contact may occur, and develop strategies for preventing it. | Preventing Cross Contact in the Kitchen | • Avoiding Cross Contact worksheet  
• Methods for Avoiding Cross Contact handout  
• Cleaning and Sanitizing Food Contact Surfaces Sample SOP  
• Serving Safe Food to Students with Food Allergies Sample SOP  
• Flow of Food SOPs worksheet  
• Food Allergy Management Plan Outline | 70 minutes |
Lesson 3: Avoiding Cross Contact

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

SAY: In this lesson, we will distinguish cross contact from cross contamination, describe how cross contact may occur, and strategies for preventing it.

**OBJECTIVE:** Explain cross contact.

SHOW SLIDE:  **Cross Contact vs. Cross Contamination**

SAY: Many people confuse cross contact and cross contamination. The terms are often used interchangeably; however, they should not as 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 foodborne illness. Examples of cross contamination include:

- Cutting raw meat on a cutting board, then chopping up fresh vegetables for the salad bar on the same cutting board without cleaning, rinsing, and sanitizing them 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, then putting bread in it.

SAY: Cross contact occurs when an allergen is transferred from a food containing an allergen to a food or surface that does not contain the allergen. Cooking **does not** reduce or eliminate the protein, so there is still the chance of a person with the allergy having a reaction to the food.

An example of cross contact would be using a knife to spread peanut butter, and only wiping it clean before being used to spread jelly. If the peanut butter goes into the jelly, the jelly cannot be used for a child with a peanut allergy. Peanut protein could remain on the knife and cause an allergic reaction for that child. Also, 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 child with a wheat allergy.

All equipment and utensils must be cleaned with hot, soapy water, rinsed, sanitized, and air dried before being used to prepare allergy-free food. A small trace of food, which could not be visible 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:

- Flour used to make bread aerosolizes and lands on another surface.
- Measuring out milk in a liquid measuring cup and then measuring out broth without cleaning in between.
- Spilling food on the serving line into others while serving it to children.
OBJECTIVE: Examine how cross contact may occur, and develop strategies for preventing it.

SHOW SLIDE: Potential Sources of Cross Contact

SAY: There are several potential sources of cross contact and ways to prevent it. Potential sources include:

- Food handling and preparation
- Insufficient handwashing
- Insufficient cleaning
- Shared equipment, utensils, cutting boards, and counters
- Splatter or steam from cooking
- Salad bars, buffets, and serving stations

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 work practices of employees.
- Inspection of raw materials.
- 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®
- 2 spatulas or other kitchen utensils (half should have Glo-germ® on them)
- Black light
- Cleaning and Sanitizing Fact Sheet

Time: 5–8 minutes of demonstration
Instructions: There will be two spatulas, one with Glo-germ® and one without. Discuss how allergens are not always visible to the naked eye, and ask which spatula has the “allergen” (Glo-germ®) on it. After giving the class a chance to answer, use the black light to show which spatula had the “allergens.” Have participants review the Cleaning and Sanitizing Fact Sheet and reinforce the importance of properly cleaning, rinsing, and sanitizing a surface. Cleaning with warm, soapy water, and the friction of scrubbing removes allergens, and the sanitizer helps kill microorganisms.

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.

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 allergy-free foods easily. Proper cleaning and sanitizing procedures in schools are needed to remove allergens. Please turn in your Participant’s Workbook to the Cleaning and Sanitizing Fact Sheet. This fact sheet provides the steps for properly cleaning and sanitizing all food contact surfaces and equipment. As you can see, it is important to wash, rinse, and sanitize all food contact surfaces and equipment. Cleaning with warm, soapy water and the friction of scrubbing removes allergens, and the sanitizer helps kill microorganisms.
Cleaning and Sanitizing Fact Sheet

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

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

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

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

Take corrective action to make sure that cleaning and sanitizing is done properly.
• Wash, rinse, and sanitize dirty food contact surfaces.
• Sanitize food contact surfaces if it cannot be determined if they have been sanitized properly.
• Discard food that comes in contact with food contact surfaces that have not been sanitized properly.

Remember, follow state or local health department requirements.
Next, we will describe some strategies that you may already use, as well as some strategies you have yet to consider when avoiding cross contact with food allergies.

Some ways you can prevent cross contact are:

- Color coding utensils, equipment, etc.
- Isolating ingredients containing allergens
- Individual preparation of menu items without allergens
- Sticker or color code wrapped food
- Having and enforcing Standard Operating Procedures for handwashing, cleaning, and sanitizing
- Including an allergen risk assessment in the HACCP-based food safety plan

Do you have any other potential sources or prevention ideas?

Do: Allow time for questions and responses.

Thank you for sharing your ideas. It is our responsibility to provide allergy safe food to students each and every time. We are now going to do an activity to practice what we have discussed.

Materials:

- Avoiding Cross Contact worksheet
- Methods for Avoiding Cross Contact handout

Time: 5 minutes of group work, 10–15 minutes class discussion

Instructions: Break participants into seven (7) groups. Assign each group a cross contact scenario from the Avoiding Cross Contact worksheet. Give the groups 5 minutes to come up with solutions to their scenario using the Methods for Avoiding Cross Contact handout for ideas. Encourage participants to write down solutions on their worksheet as groups report out.

Please turn in your Participant’s Workbook to the Avoiding Cross Contact worksheet. I am going to split you into seven groups. Each group will have one scenario of cross contact. Work in your group to determine the solutions for your scenario of possible cross contact. Use the Methods for Avoiding Cross Contact handout as a reference.

Allow participants 5 minutes to come up with solutions. Have participants choose a spokesperson to report out.

Select a spokesperson from your group to share with the class. Write down solutions on your Avoiding Cross Contact worksheet.

Allow participants 10–15 minutes to say their solutions.
## Avoiding Cross Contact Possible Answers

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

<table>
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<th>Problem</th>
<th>Solution</th>
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| 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 child with allergies. Use clean spoon to put jelly on 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 properly cleaning. | Make the allergen safe food first. Clean cooking equipment including the cooking area with hot, soapy water. |
| Ingredients from an allergenic food may splatter, splash, or spill into the allergy-free food when making a catering platter. | Prepare the allergy-free foods first, cover, and remove from the cooking area prior to preparing the foods for others. |
| You know that a student has a severe peanut allergy. You observe that another student in the dining room has a hand full of peanuts and is laughing with friends and pointing at the boy with the allergy. | Go to the student with the peanut allergy and escort him from the dining room. Make sure you know where his epinephrine auto-injector is located. Tell the principal about the situation, and sit in on the meeting with the students. Also, remove the bully. |
| Allergy-free foods may come in contact with an allergen in storage, in the refrigerator, or the dry storage. | Designate a separate shelf in the refrigerator and cupboard for allergy-free foods. This shelf should be above the shelf that may store foods with potential allergens. Consider using stickers to identify “safe” foods. Discard anything that is suspected of cross contact, or do not use it for the child with allergies. |
| Kitchens may slice various meats and cheeses on shared equipment. Meats could contain allergenic ingredients such as milk, soy, wheat, or nuts. | • Make sure staff are following Standard Operating Procedures to clean equipment.  
• Slice allergy-free food first. |
| Cafeteria lines and buffets may have greater risk of cross contact due to shared utensils and spills. | Have the school nutrition manager keep the safe food separate to prevent cross contact. |
Methods for Avoiding Cross Contact

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

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

How to Avoid It

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

SHOW SLIDE: Standard Operating Procedures

SAY: Let’s go into detail about two of the prevention ideas: 1) Standard Operating Procedures for cleaning and sanitizing, and 2) including an allergen risk assessment in the HACCP-based food safety plan.

For cleaning and sanitizing, allergen residue can only be removed with soap, water, and friction. You need to know that sanitizing alone will NOT remove allergen residue.

ASK: What method is used to clean cafeteria tables?
DO: Pause to listen to participant responses.

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

ASK:
- How often are tables cleaned with soap, water, and friction?
- Can you see from this example the risk of cross contact?
- How can the risk be reduced or eliminated?

SAY: I ask these questions for you to think about your procedures for cleaning. How will you communicate this information to your staff and others in your school, and do your Standard Operating Procedures need to be updated to accommodate for allergies?

SHOW SLIDE: Examples of Food Allergy Management SOPs

SAY: Please turn in your Participant’s Workbook to the ICN’s Cleaning and Sanitizing Food Contact Surfaces (Sample SOP) and Serving Safe Food to Students with Food Allergies (Sample SOP). The first sample SOP is for cleaning and sanitizing food contact surfaces. The SOP includes a purpose, scope of who the SOP applies to, key words, instructions for completing a task safely, monitoring procedures, corrective actions for detected issues, verification processes to ensure the SOP is effective, and a method of record-keeping to ensure documentation of all procedures taken to keep food safe. Be sure to include the author and date when first written as well as when changes or annual review are completed.

The second SOP outlines ways of safely preparing and serving food to a child with food allergies. It also details ways to prevent cross contact during preparation and meal service. These example SOPs can be adapted to your school setting.

DO: Quickly touch on other main points in the SOPs such as proper set up for cleaning, what equipment may be needed, and how to avoid cross contact.
Cleaning and Sanitizing Food Contact Surfaces
(Sample SOP)

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

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

KEY WORDS: Food Contact Surface, Cleaning, Sanitizing

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

1. During all hours of operation, visually and physically inspect food contact surfaces of equipment and utensils to ensure that the surfaces are clean.

2. In a 3-compartment sink, on a daily basis:
   • Visually monitor that the water in each compartment is clean.
   • Take the water temperature in the first compartment of the sink by using a calibrated thermometer.
   • If using chemicals to sanitize, test the sanitizer concentration by using the appropriate test kit for the chemical.
   • If using hot water to sanitize, use a calibrated thermometer to measure the water temperature. It should be at or above 171 °F. Refer to Using and Calibrating Thermometers SOPs.

3. In a dish machine, on a daily basis:
   • Visually monitor that the water and the interior parts of the machine are clean and free of debris.
   • Continually monitor the temperature and pressure gauges, if applicable, to ensure that the machine is operating according to the data plate.
   • For hot water sanitizing dish machine, ensure that food contact surfaces are reaching the appropriate temperature by placing a piece of heat sensitive tape on a smallware item or a maximum registering thermometer on a rack and running the item or rack through the dish machine.
   • For chemical sanitizing dish machine, check the sanitizer concentration on a recently washed food contact surface using an appropriate test kit.

CORRECTIVE ACTION:

1. Retrain any school nutrition employee found not following the procedures in this SOP.
2. Wash, rinse, and sanitize dirty food contact surfaces. Sanitize food contact surfaces if it is discovered that the surfaces were not properly sanitized. Discard food that comes in contact with food contact surfaces that have not been sanitized properly.

3. In a 3-compartment sink:
   • Drain and refill compartments periodically and as needed to keep the water clean.
   • Adjust the water temperature by adding hot water until the desired temperature is reached.
   • Add more sanitizer or water, as appropriate, until the proper concentration is achieved.

4. In a dish machine:
   • Drain and refill the machine periodically and as needed to keep the water clean.
   • Contact the appropriate individual(s) to have the machine repaired if the machine is not reaching the proper wash temperature indicated on the data plate.
   • For a hot water sanitizing dish machine, retest by running the machine again. If the appropriate surface temperature is still not achieved on the second run, contact the appropriate individual(s) to have the machine repaired. Wash, rinse, and sanitize in the 3-compartment sink until the machine is repaired, or use disposable single service/single-use items if a 3-compartment sink is not available.
   • For a chemical sanitizing dish machine, check the level of sanitizer remaining in bulk container. Fill, if needed. “Prime” the machine according to the manufacturer’s instructions to ensure that the sanitizer is being pumped through the machine. Retest. If the proper sanitizer concentration level is not achieved, stop using the machine and contact the appropriate individual(s) to have it repaired. Use a 3-compartment sink to wash, rinse, and sanitize until the machine is repaired.
VERIFICATION AND RECORD KEEPING:
School nutrition employees will record monitoring activities and any corrective action taken on the Food Contact Surfaces Cleaning and Sanitizing Log. The school nutrition manager will verify that employees have taken the required temperatures and tested the sanitizer concentration by visually monitoring school nutrition employees during the shift and reviewing, initialing, and dating the Food Contact Surfaces Cleaning and Sanitizing Log. The log will be kept on file for at least 1 year. The school nutrition manager will complete the Food Safety Checklist daily. The Food Safety Checklist is to be kept on file for a minimum of 1 year.

DATE IMPLEMENTED: ________________ BY: ____________________

DATE REVIEWED: ________________ BY: ____________________

DATE REVISED: ________________ BY: ____________________
Serving Safe Food to Students with Food Allergies  
(Sample SOP)

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

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

KEY WORDS: Allergies, Cleaning, Cross contact, Handwashing

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

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

CORRECTIVE ACTION:
1. Retrain any child nutrition employee found not following the procedures in this SOP.
2. Do not serve any food to a student with a food allergy if there is any question as to whether or not an allergen might be present in that particular food.
3. Activate the school emergency action plan immediately if a student with the potential for anaphylaxis consumes a food allergen.
SAY: ICN has an extensive library of SOPs that can be used when developing your SOPs. They can be accessed at www.theicn.org. These SOPs are available in Word so that they can be adapted to your school.

SHOW SLIDE: **HACCP-Based Food Safety Plan**

SAY: The goal of a HACCP-based food safety plan is to control, prevent, and minimize food safety hazards that may cause illness or injury. There are four hazards that are addressed in a food safety plan: biological, chemical, physical, and radiological. Food allergens are considered a chemical food safety hazard. Your plan might need to be updated to incorporate information from this training on the risks of cross contact and controlling allergens.

**Instructor’s Note:** If people want to know why food allergens are considered a chemical hazard, refer to FDA Food Code Annex 4 – The HACCP Principles which states that they are naturally occurring chemical hazards.

ASK:
- What method do you use to assure that your staff follows your food safety plan and follows Standard Operating Procedures?
- How do you make sure that they do not take short cuts and stop the process if they make a mistake?

DO: Allow time for participant responses.

FEEDBACK:
- Train staff in the importance of proper cleaning procedures – wash, rinse, sanitize – when it comes to managing food allergies.
- Monitor employees during production.
- Have an SOP in place for food allergies.
- Check sanitation logs.
Thank you for sharing your methods, and please consider how you will challenge your staff to prevent cross contact. Since our customers trust us to provide safe food, we should consider how we assure that safety.

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

### SHOW SLIDE:  *Flow of Food SOPs Activity*

### DO:  **ACTIVITY:** Flow of Food SOPs Activity

**Materials:**
- Cleaning and Sanitizing Food Contact Surfaces (Sample SOP)
- Serving Safe Food to Students with Food Allergies (Sample SOP)
- Flow of Food SOPs worksheet

**Time:** 10 minutes of individual work, 10 minutes class discussion

**Instructions:** Participants will reflect on what they have learned in Lesson 3. Using the *Flow of Food SOPs* worksheet, participants will write where cross contact can occur during the flow of food process. Then, participants will write what procedures and SOPs they can use to prevent that situation of cross contact in their kitchen. Participants can refer to the *Cleaning and Sanitizing Food Contact Surfaces* (Sample SOP) and *Serving Safe Food to Students with Food Allergies* (Sample SOP) for ideas.

Please turn in your Participant’s Workbook to the *Flow of Food SOPs* worksheet. For your school kitchen, write situations where cross contact can occur during the flow of food process. Then, write what procedures and SOPs you can use to prevent those situations.

Use the *Cleaning and Sanitizing Food Contact Surfaces* and *Serving Safe Food to Students with Food Allergies Sample SOPs* for ideas.
### Flow of Food SOPs

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

<table>
<thead>
<tr>
<th>Flow of Food Chart</th>
<th>Cross Contact Occurs</th>
<th>SOP and Procedure for Avoiding It</th>
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<tbody>
<tr>
<td>Receive</td>
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<td>Store</td>
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**Instructor's Note:** This is an example list of procedures for preventing cross contact in the Receiving Area of the kitchen.

**Example:**
- 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 10 minutes for individual work.

**ASK:** Now that we worked on our individual procedures, would a couple of you like to share your procedures for avoiding cross contact in your kitchen with the group?

**DO:** Spend about 10 minutes having people report out a situation and procedure for each process.

**SHOW SLIDE:** *Food Allergy Management Plan Outline – Lesson 3*

**DO:** **ACTIVITY:** *Food Allergy Management Plan Outline – Lesson 3*

**Materials:**
- Food Allergy Management Plan Outline

**Time:** 10 minutes

**Instructions:** Tell participants to get the *Food Allergy Management Plan Outline*. Give participants 10 minutes to fill in the *Staff Training on Food Allergies and Daily Management of Food Allergies* sections of the outline.

**SAY:** Please get the *Food Allergy Management Plan Outline*. Find the *Staff Training on Food Allergies* and *Daily Management of Food Allergies* sections. Fill out these sections according to your school; if you have multiple schools, choose one to focus on.
### Food Allergy Management Plan Outline

#### Daily Management of Food Allergies

<table>
<thead>
<tr>
<th>Task</th>
<th>Stakeholders Involved</th>
<th>Roles</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>504 and IEP meetings</td>
<td></td>
<td></td>
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<tr>
<td>Student privacy</td>
<td></td>
<td></td>
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<tr>
<td>• Storing student information</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Accommodating children with disabilities</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Managing food labels</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Reading food labels for eight major allergens</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>• Keep ingredient statements for 24 hours</td>
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<tr>
<td>• SOPs</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>Prepare and serve food safely</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Eliminate risks of cross contact</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Remove allergen residue from hard surfaces</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• SOPs</td>
<td></td>
<td></td>
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</tr>
</tbody>
</table>

#### Staff Training on Food Allergies

<table>
<thead>
<tr>
<th>Task</th>
<th>Stakeholders Involved</th>
<th>Roles</th>
<th>Notes</th>
</tr>
</thead>
<tbody>
<tr>
<td>General food allergies</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Reading Labels</td>
<td></td>
<td></td>
<td></td>
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<tr>
<td>SOPs</td>
<td></td>
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<td></td>
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<tr>
<td>• Cleaning to remove allergens</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Preparing and serving food safely</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Avoiding cross contact</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Customer Service/Student Privacy</td>
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<td></td>
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</tbody>
</table>
SHOW SLIDE: Lesson 3 Review

SAY: We have now finished our third lesson – Avoiding Cross Contact.

We have covered how to:
• Explain cross contact.
• Examine how cross contact may occur and develop strategies for preventing it.

ASK: What questions do you have before we proceed?
# Lesson 4: Acommodating Food Allergies in Schools

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>List the laws for accommodating students with food allergies, and describe how they impact a school nutrition program.</td>
<td>• Food-Related Laws handout</td>
<td></td>
<td>35 minutes</td>
</tr>
<tr>
<td>Discuss accommodating child with food allergies and the documentation needed.</td>
<td>• CDC Guidelines for Managing Food Allergies handout</td>
<td></td>
<td>20 minutes</td>
</tr>
<tr>
<td>Determine how to engage and educate stakeholders in managing food allergies in schools.</td>
<td>Develop Plan to Promote Food Allergy Awareness in Schools</td>
<td>• Food Allergy Stakeholders handout</td>
<td>40 minutes</td>
</tr>
<tr>
<td></td>
<td>• CDC Food Allergy Training Recommendations for Schools handout</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Develop Plan to Promote Food Allergy Awareness in Schools worksheet</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Determine strategies to manage food prepared and served outside of the cafeteria.</td>
<td>Reduce the Risk</td>
<td>• Reduce the Risk handout</td>
<td>45 minutes</td>
</tr>
<tr>
<td></td>
<td>• Flip chart paper</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Markers</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>• Food Allergy Management Plan Outline</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Lesson 4: Accommodating Food Allergies in Schools

SHOW SLIDE: Lesson 4: Accommodating Food Allergies in Schools

SAY: In this lesson, we will discuss how to manage food allergies in schools successfully, including the laws related to food allergies, recognizing stakeholder responsibilities, and managing food from outside of the cafeteria.

OBJECTIVE: List the laws for accommodating students with food allergies, and describe how they impact a school nutrition program.

SHOW SLIDE: Respect and Protect Children with Food Allergies

SAY: Along with ensuring that the food we serve children is safe, respecting and protecting the privacy of children 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 accommodation. Children with food allergies should not be singled out, and their privacy is to be respected. You may have heard of schools or be a school that ban foods thinking they are going to prevent an allergic reaction. Allergens are everywhere, and most experts recommend we understand and manage rather than ban foods. There is no way to monitor a ban on foods or provide 100% confidence that the allergen won’t be introduced. We should not guarantee what cannot be measured or controlled. The CDC’s Voluntary Guidelines to Managing Food Allergies recommends providing Allergy Safe Zones coupled with education and training. However, children with allergies should never be forced to use these zones.

Children with food allergies can be bullied, teased, or harassed at school, not only by other children, but sometimes by teachers and school staff. Verbal abuse appears to be the most common offense. In reported cases, children describe being physically threatened by having the allergen thrown at or dangled in front of them, or being smeared with their allergen. If your school has a food allergy policy or plan, disciplinary actions should be outlined and enforced for anyone caught bullying someone with food allergies.

Please turn to the Food-Related Laws handout in your Participant’s Workbook. We will be discussing the laws on this handout and how they related to food allergy management in schools.
Food Allergies for School Nutrition Directors

Instructor's Manual

SHOW SLIDE: Food-Related Laws

SAY: There are three Federal laws that we’ll review. I want you to know how they impact school nutrition programs.

The first is the Rehabilitation Act of 1973; Section 504 of the Act. This law prohibits discrimination against qualified persons with disabilities in programs or activities of any agency of the Federal government’s executive branch, as well as any organization receiving Federal financial assistance. The school nutrition programs are provided with Federal assistance through:

- National School Lunch Program
- School Breakfast Program

<table>
<thead>
<tr>
<th>Law</th>
<th>How it Relates to School Nutrition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rehabilitation Act of 1973</td>
<td>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:</td>
</tr>
<tr>
<td></td>
<td>• National School Lunch Program</td>
</tr>
<tr>
<td></td>
<td>• School Breakfast Program</td>
</tr>
<tr>
<td></td>
<td>• Fresh Fruit &amp; Vegetable Program</td>
</tr>
<tr>
<td></td>
<td>• After School Snack Program</td>
</tr>
<tr>
<td></td>
<td>504 Plan derived from this law</td>
</tr>
<tr>
<td>Individuals with Disabilities Education Act (IDEA )1975, Part B 2006</td>
<td>Requires a free and appropriate public education be provided for children with disabilities aged 3–21</td>
</tr>
<tr>
<td></td>
<td>IEP Plan derived from this law</td>
</tr>
<tr>
<td>Americans with Disabilities Act (ADA) 1990 and 2008 Amendments</td>
<td>Broadens and extends civil rights protections for approximately 50 million Americans with disabilities</td>
</tr>
<tr>
<td></td>
<td>According to the ADA, all food allergies and intolerances have the potential to be considered disabilities</td>
</tr>
<tr>
<td>The Health Insurance Portability &amp; Accountability Act (HIPPA) 1996</td>
<td>Requires all medical records disclosed be kept properly confidential</td>
</tr>
<tr>
<td></td>
<td>Gives the patient rights to control how health information is used</td>
</tr>
<tr>
<td>Family Educational Rights and Privacy Act (FERPA) 1974</td>
<td>Protects the privacy of health information entered into a student’s record</td>
</tr>
</tbody>
</table>

• Fresh Fruit & Vegetable Program
• After School Snack Program

USDA has its own non-discrimination statement adapted from this law which can be found at 7 CFR 15b, *Nondiscrimination on the Basis of Handicap in Programs or Activities Receiving Federal Financial Assistance.*

SHOW SLIDE: **Federal Laws: IDEA**

SAY: The second law is the *Individuals with Disabilities Education Act (IDEA).* This act requires a free and appropriate public education for children with disabilities. It requires that public agencies, like schools, take steps to ensure that children with disabilities, such as food allergies and intolerances, have an equal opportunity to benefit from extracurricular services and activities including meals.

SHOW SLIDE: **Federal Laws: ADA**

SAY: The third law is ADA. The *Americans with Disabilities Act* was passed in 1990 and extended civil rights protections for Americans with disabilities. The *ADA Amendments Act* in 2008 broadened the definition of disabilities to encompass impairments that limit Major Life Activities; Major Bodily Functions was added as part of extending the definition of disability. USDA’s *Accommodating Children with Disabilities in the School Meal Programs* gives examples of major life activities and major bodily functions.

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 functions 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.

A child’s condition does not have to be life-threatening to be considered a disability; for example, a food allergy may still be considered a disability even if it does not cause anaphylaxis and is not life-threatening.

SHOW SLIDE: **Privacy Laws**

SAY: The two laws that deal with privacy for children 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 medical information be kept confidential and protect privacy of information entered into a student’s record. When you get medical information (in any form) about a child with life-threatening food allergies or food intolerances, the information must be kept confidential.

HIPPA requires that all medical records disclosed by Federal programs in any form be kept properly confidential and gives the patient, or in the case of a minors their parents or legal guardians, the rights to understand and control how health information is used.

FERPA protects the privacy of information (including health information) entered into a student’s record. Parents or guardians can review the records, and when a student becomes 18 or is attending college, the right to view transfers to the student. Review your district’s
procedures and make sure the parents or guardians are aware of and agree with them.

**ASK:** How do you keep 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

**ASK:** Would some people volunteer to explain how your school handles information for children with food allergies, and who is involved in each step?

**DO:** Write flow charts on the flip chart.

**FEEDBACK:**
School Nurse → School Nutrition Director (keeps it in locked cabinet) → School Nutrition Staff (aware of children 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 with the use of SOPs and training will help to alleviate possible combative situations such as a civil rights complaint. Showing the parents or guardians that the school has a food allergy action plan in place and that you understand the necessity of following what the state licensed healthcare professional’s statement requires will build trust with the family.

We want you to understand your roles and responsibilities so that you can work appropriately with parents or guardians, students, and the rest of the school community so there will not be a reason for a civil rights complaint or investigation.

**ASK:** This was a very quick overview of regulations. Are there any questions you might 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:** *Student’s Rights and Responsibilities*

**SAY:** A student has a right to nutrition services at school without discrimination, but the student has some responsibilities of his or her own too. Students must be proactive in the care and management of food allergies and reactions based on developmental level. They should notify an adult immediately if something eaten is believed to contain the food to which he/she is allergic. They should also notify an adult if he/she is being harassed or threatened by other students or adults as it relates to their food allergy.

**SHOW SLIDE:** *Tools Schools Use to Implement Laws*
Schools need a mechanism to implement the laws. These are two tools that schools use: the 504 Plan and the Individualized Education Plan (IEP).

The 504 Plan comes from the Rehabilitation Act of 1973, Section 504. Other tools or other terms for these tools may be used in your school.

IEPs are written and agreed to by a team of professionals at the school, the parent or guardian, and the student when he/she is age appropriate. When there is a food-related item listed in the plan, someone from the School Nutrition Department should be involved in the meeting or receive the information from someone who attended the meeting. Establish your communication methods to determine how you will receive the information. You need to know about these plans. These are formal meetings with written plans and the expectation is that what is written in the plan will be followed.

Have any of you participated in a 504 or IEP meeting? If so, will you share your experience with the group?

Allow some time for sharing.

Objective: Discuss accommodating child with food allergies and the documentation needed.

SHOW SLIDE: Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals

Thank you for sharing this information. USDA provides guidance for school nutrition programs to meet the needs of children with food allergies called Accommodating Children with Disabilities in the School Meal Programs – Guidance for School Food Service Professionals.

State agencies also provide support tools for SNP’s managing special dietary needs. Some State agencies and/or school districts have forms for state licensed healthcare professionals and families, frequently asked questions, and links to guidance documents like the CDC Voluntary Guidelines for Managing Food Allergies and the USDA Guidance document.

SHOW SLIDE: Strategies to Accommodate Students with Food Allergies

There are several strategies to accommodate students with food allergies. Step 1 is to be aware of the food allergies in your school as you do menu planning, read labels, and follow HACCP principles.

Step 2 is to know the requirements for serving food to students with special dietary needs. This information is in the USDA guidance, and if your school has a food allergy policy, the information would be there as well. Your State agency can also provide more information and answer questions.
SHOW SLIDE: **School Meal Requirements**

**SAY:** When a student’s disability prevents them from consuming a school meal as prepared, meal accommodations must be made. Such meals are reimbursable at the free, reduced price, or paid rates even if they do not meet the meal pattern. If a disability causes a child to have a meal that does not follow the meal pattern, a written medical statement signed by a state licensed healthcare professional is required. As mentioned earlier in the presentation, school nutrition services should be part of the team that discusses the management plan related to the care of the student. Schools are responsible for ensuring the student’s educational and nutritional components are met.

Meals provided to students with food-related disabilities must be provided to them at no extra charge. 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 is not able to absorb such costs, other funds may be available, including general school district funds, Special Education funds, and/or other sources of funding. If this becomes an issue for a School Food Authority (SFA), it is recommended the school work with their State agency and possibly other offices in the Department of Education to identify possible funding sources.

The disability determination can only be made by a state licensed healthcare professional. To determine what your state considers a state licensed healthcare professional, contact your State agency. The school staff must ensure that they understand the information provided by the state licensed healthcare professional, and if not, they must ask for clarification from the parent/guardian before a meal can be provided.

SHOW SLIDE: **The Partnership**

**SAY:** Step 3 of accommodating a child with food allergies gets to the core of managing food allergies – developing a partnership with open communication and education for all those involved with the child’s care. Parents or guardians of students with food allergies have a lot of experience and expertise in the topic, so they can be an asset to the team at the school.

We will discuss later how different people in the partnership have different responsibilities, but to briefly cover it:

**School’s Responsibility:**
- Create an environment where children with food allergies will be safe.
- Use prevention and avoidance strategies.
- Be prepared to handle an allergic reaction.
- Address teasing and/or bullying.

**The Family’s Responsibility:**
- Notify school of the child’s allergies.
- Provide written medical documentation, instructions, and medications as directed by a state licensed healthcare professional.
- Provide properly labeled medications, keep them current.
- Provide emergency contact information.
The Student's Responsibility:
  • No food trading.
  • Don't eat anything with unknown ingredients or a food known to contain allergens.
  • Be proactive in managing his or her own food allergy depending on their developmental level.
  • Notify an adult immediately if something is eaten that may contain an allergen.

Through the collaboration of the school and community, take action to develop and implement a written food allergy management plan for each school in your district that includes emergency care plans for children with food allergies.

SHOW SLIDE: **Accommodating Students with Food-Related Disabilities**

**SAY:** Step 4 is to implement the instructions of the state licensed healthcare professional. There are sample forms available that should be returned to the school signed by a state licensed healthcare professional. If the form indicates the student has a food-related DISABILITY, school nutrition services is required to make the accommodation, and any action the nutrition services takes is based on information on the form from the state licensed healthcare professional. You, your staff, others in the family, and the school cannot make changes in the directives of the state licensed healthcare professional.

SHOW SLIDE: **Medical Statement**

**SAY:** With the new *Accommodating Children with Disabilities in the School Meal Programs Guidance for School Food Service Professionals*, some clarification has been given on when a medical statement is needed. If the accommodations for the meal do not meet the meal pattern regulations, a medical statement must include:
  • “Information about the child's physical or mental impairment that is sufficient to allow the [School Food Authority] SFA to understand how it restricts the child's diet,
  • An explanation of what must be done to accommodate the child's disability, and
  • The food or foods to be omitted and recommended alternatives, in the case of a modified meal.”

If you are unclear about anything, contact the state licensed healthcare physician.

SHOW SLIDE: **When Medical Statement Required**

**SAY:** If a child’s food allergy can be accommodated within the meal pattern, a medical statement is not required at the Federal level, although it may be required at the State. USDA Food and Nutrition Services strongly encourages SFAs to have detailed documentation about the actions taken to accommodate a child with a food allergy if no medical statement is on file. An important factor in all foods being served is preventing cross contact during preparation; students and their families trust us to always serve safe food. If the disability goes outside of the meal pattern, a medical statement is required for reimbursement.

If there is no disability the accommodation is not required but can be made as a gesture of support and customer service. An example would be a request based dietary preference for religious or cultural reasons. In many cases, preferences can be dealt with through “Offer Versus Serve” (OVS) or by providing additional selections.
It is not up to the School Food Authority (SFA) to question whether a condition is a disability or not. That is the responsibility (and expertise) of the state licensed healthcare professional. Once a SFA has a complete statement containing all needed elements, the school must provide the student a meal in accordance with the healthcare professional’s instructions.

Serving students with food-related disabilities can sometimes be handled through OVS. Offer Versus Serve allows children to choose what foods they eat. You can use this offering of a variety of options for children with food allergies. For example, if a child is allergic to apples but you offer apples and bananas using OVS, then the child can take the banana with no additional menu adjustment required. The food provided for a child with the food allergy must be nutritionally equivalent. For example, you could not give a child with a wheat allergy an extra piece of fruit to avoid wheat; the child must be given a nutritional equivalent such as wheat-free bread.

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

**DO:** Allow participants time to respond.

**SAY:** A young student will need assistance with food choices to avoid the allergen. As the student gets older, he or she will need less assistance making choices. Use of careful preparation and service, following Standard Operating Procedures, and verifying that the procedures are effective will prevent cross contact.

**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 contained 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.

**SHOW SLIDE:** *Methods to Boost Food Allergy Awareness*

**ASK:** Have you been thinking about your school and what you might do when you return?

**DO:** Allow time for participant responses.

**SAY:** Since food allergies and intolerances are on the rise, the topic deserves your attention. Here is a starting place:

- Determine knowledge level and training needs for school nutrition staff and school colleagues.
- Verify process to respond to product recalls due to allergens.
- Brainstorm what action to take after attending this course.
- Identify food allergy resources.
OBJECTIVE: Determine how to engage and educate stakeholders in managing food allergies in schools.

SHOW SLIDE: *Communication with Key Partners*

SAY: Keeping children with allergies safe in schools is a community effort. There are several stakeholders involved in the process of creating a food allergy management plan for a child. Communication with key partners will support your efforts to provide safe food to all of your students and staff. Think about the *Caitlin Remembered* video and where the communication failed.

ASK:
- What methods of communications do you use regarding food allergies with your stakeholders?
- Do you know who the stakeholders are in your school?

DO: Allow for responses.

SHOW SLIDE: *Food Allergy Stakeholders*

SAY: In your workbook, please turn to the *Food Allergy Stakeholders* handout. This is a list of stakeholders and their responsibilities as they relate to a school’s food allergy management program. We are going to look at strategies for working with stakeholders to meet the needs of students with allergies.

DO: Review handout with participants.

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**Food Allergy Stakeholders**

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

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

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

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

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

Parent or Guardian of Student with Food Allergies
• Ensure school has the student’s emergency care plan prescribed by a state licensed healthcare professional.
• Provide school with needed medication as prescribed by a state licensed healthcare professional.
• Work with school nutrition on parts of the care plan that involve food substitutions.
• Educate child about their food allergies.
Student with Food Allergies
- Understand known allergies depending on developmental level.
- Do not trade food with other students.
- Do not eat food with unknown ingredients list or a food known to contain allergens.
- Report any bullying.
- Report immediately if food allergen was consumed.
- Talk with school nutrition staff if unsure food served contains food allergen.

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

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


SHOW SLIDE: **CDC Recommendations for Food Allergy Training in Schools**

**SAY:** Please turn in your Participant’s Workbook to the CDC Food Allergy Training Recommendations for Schools handout. In the CDC Voluntary Guidelines for Managing Food Allergies there are training recommendations for schools:
- Provide professional development on food allergies for staff:
  - General training on food allergies for all staff
  - In-depth training for staff who have frequent contact with children with food allergies
  - Specialized training for staff responsible for managing the health of children with food allergies on a daily basis
- Teach all children about food allergies.
- Teach all parents or guardians and families about food allergies.
# CDC Food Allergy Training Recommendations for Schools

## General training for all staff

<table>
<thead>
<tr>
<th>Who this includes</th>
<th>Training recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Administrators</td>
<td>• School program policies and practices</td>
</tr>
<tr>
<td>• School nutrition staff (including contract staff)</td>
<td>• Overview of food allergies</td>
</tr>
<tr>
<td>• Classroom and specialty teachers</td>
<td>• Definitions of key terms, including food allergy, major allergens, epinephrine, and anaphylaxis</td>
</tr>
<tr>
<td>• Athletic coaches</td>
<td>• Difference between potentially life-threatening food allergy and other food-related problems</td>
</tr>
<tr>
<td>• School counselors</td>
<td>• Signs and symptoms of a food allergy reaction and anaphylaxis</td>
</tr>
<tr>
<td>• Bus drivers</td>
<td>• Information on common emergency medications</td>
</tr>
<tr>
<td>• Custodial and maintenance staff</td>
<td>• General strategies for reducing and preventing exposure to allergens (in food and nonfood items)</td>
</tr>
<tr>
<td>• Therapists</td>
<td>• Policies on bullying and harassment for children with food allergies</td>
</tr>
<tr>
<td>• Paraeducators</td>
<td>• School’s emergency plans, including who will be contacted in the case of an emergency, how staff will communicate during a medical emergency, and what essential information they will communicate</td>
</tr>
<tr>
<td>• Special education service providers</td>
<td></td>
</tr>
<tr>
<td>• Librarians and media specialists</td>
<td></td>
</tr>
<tr>
<td>• Security staff</td>
<td></td>
</tr>
<tr>
<td>• Substitute teachers</td>
<td></td>
</tr>
<tr>
<td>• Volunteers such as playground monitors and field trip chaperones</td>
<td></td>
</tr>
</tbody>
</table>

## In-depth training for staff who have frequent contact with children with food allergies

<table>
<thead>
<tr>
<th>Who this includes</th>
<th>Training recommendations</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Identified classroom and specialty teachers</td>
<td>• Responding to a food allergy emergency</td>
</tr>
<tr>
<td>• Paraeducators</td>
<td>• Information about Federal laws (i.e. ADA, Section 504, and FERPA), state laws (including regulations), or district policies</td>
</tr>
<tr>
<td>• Athletic coaches</td>
<td>• Administering an epinephrine auto-injector for trained staff</td>
</tr>
<tr>
<td>• Bus drivers</td>
<td>• Helping children treat their food allergy episodes</td>
</tr>
<tr>
<td>• School nutrition managers</td>
<td>• Effects of food allergies on children’s behavior and ability to learn</td>
</tr>
<tr>
<td>• Other school nutrition staff who prepare, handle, or serve food</td>
<td>• Importance of giving emotional support to children with food allergies and to children who witness a food allergy reaction</td>
</tr>
<tr>
<td></td>
<td>• Common risk factors, triggers, and areas of exposure to food allergens in schools</td>
</tr>
<tr>
<td></td>
<td>• Strategies for integrating children with food allergies into school and class activities while reducing the risk of exposure to allergens in classrooms, during meals, during nonacademic outings, on field trips, during official activities before and afterschool, and during events sponsored by schools that are held outside of regular hours</td>
</tr>
<tr>
<td></td>
<td>• Some strategies include:</td>
</tr>
<tr>
<td></td>
<td>▪ Special seating arrangements when age and circumstances are appropriate</td>
</tr>
<tr>
<td></td>
<td>▪ Procedures for keeping foods with allergens separated from allergy-free foods</td>
</tr>
</tbody>
</table>
### Specialized training for staff responsible for managing the health of children with food allergies on a daily basis

<table>
<thead>
<tr>
<th>Who this includes</th>
<th>Training recommendations</th>
</tr>
</thead>
</table>
| • District nurses  
• School nurses  
• School doctors  
• Professionally qualified health coordinators or managers  
• School nutrition director | • Creating an emergency care plan  
  ▪ Review or develop other individual care plans as needed  
  ▪ Managing and storing medication  
  ▪ Delegating and training unlicensed assistive personnel to administer epinephrine  
  ▪ Helping children manage their food allergies  
  ▪ Documenting the tasks performed for food allergy management  
  ▪ Evaluating emergency responses and staff members’ ability to respond to food allergy emergencies |

### Training recommendations for teaching children

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

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

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

ASK:
• Does your school conduct training for all the staff and families?
• How would you go about getting the topic of food allergies on the agenda?

FEEDBACK:
• Speak to the PTA
• Ask the principal
• Conduct your own training

SAY: You could very well know the most about food allergies in your school.

ASK:
• Would you be willing to share your knowledge?
• What community resources would be able to help if you are too busy to provide the information?

FEEDBACK:
• Health department
• Cooperative extension
• State agency
• Professional associations
• School nurse

SAY: You need to think of ways to:
• Increase your knowledge and the knowledge of your staff.
• Identify what are food allergies.
• Identify how to recognize the symptoms of an allergic reaction.
• Describe how to respond in an emergency.

SHOW SLIDE: Develop Plan to Promote Food Allergy Awareness in Schools Activity

DO: ACTIVITY: Develop Plan to Promote Food Allergy Awareness in Schools

Materials:
• Develop Plan to Promote Food Allergy Awareness in Schools worksheet
• Food Allergy Stakeholders handout

Time: 10 minutes of individual work; 5 minutes class discussion

Instructions: Using the Develop Plan to Promote Food Allergy Awareness in Schools worksheet and Food Allergy Stakeholders handout, participants will select one stakeholder from the list and write out at least one way to promote food allergy awareness to that stakeholder.
SAY: Please turn to the Develop Plan to Promote Food Allergy Awareness in Schools worksheet in your Participant’s Workbook. Using the Food Allergy Stakeholders handout, select one stakeholder from the list and write out at least one way to promote food allergy awareness to that stakeholder.

DO: Allow participants 10 minutes to write out activity.

<table>
<thead>
<tr>
<th>Who is my target audience? (Stakeholder)</th>
<th>How will I promote?</th>
<th>What is my timeline?</th>
</tr>
</thead>
</table>

SAY: Who would like to share their plan with the group?

DO: Allow 5 minutes for people to report out. Thank the volunteers.

SAY: Establishing a relationship with stakeholders and determining how to communicate and work with them will advance your efforts to manage food allergens. **Communication, communication, communication!** Develop the lines of communication and keep them open.

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 manage food allergies with these suppliers?
- If you don’t have personal experience with outside suppliers, can you come up with some ideas on how those who do use outside suppliers would manage them?
- Are there any tools you have heard about today that would reduce food allergy risks with 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?

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

ASK: What are the food allergy problems you could have with this food that you prepare?

FEEDBACK:
- Lose control once 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 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?
- If there was a food allergy emergency, would you be questioned or implicated?
- Would the people think the food came from nutrition services?

DO: Pause to listen to participant responses.

SAY: Encouraging and increasing food allergy awareness throughout the school community might have a positive impact on how food is handled and served. Building food allergy education for teachers, students, and school staff should be included in a school’s Food Allergy Management Plan. Communicating with outside providers such as restaurants and caterers about what food allergies you have in the school can make them aware and help reduce food allergy risk.
SHOW SLIDE:  *Reduce the Risk Activity*

SAY:  The next activity deals with food from outside sources.

DO:  **ACTIVITY: Reduce the Risk**

Materials:
- **Reduce the Risk** handout
- Flip chart paper (one per table)
- Markers

Time:  5–10 minutes of group work, 15 minutes class discussion

Instructions:  Participants will work in groups of five (5). Each group will be given a scenario of a child with a food allergy being fed food from an outside vendor. The group will discuss possible solutions for keeping the child safe. Groups will then write their solutions on the flip chart paper.

SAY:  Please turn in your Participant’s Workbook to the **Reduce the Risk** handout. I’m going to count you off into groups of five. Each group will be assigned one of the scenarios. You will determine how to safely provide food to a child with known life-threatening food allergies from an outside food source. You will be given a description of a child faced with a particular situation.

Record the actions you would take to provide for the child on the flip chart paper. Select a spokesperson from your group to share the situation and the actions your group would take to provide for the child.

DO:  Assign a scenario to each group. Allow 5–10 minutes for groups to discuss and write out solutions.
## Reduce the Risk Possible Answers

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

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

DO: Allow 15 minutes for groups to report out.

SHOW SLIDE:  *Food Allergy Management Plan Outline – Lesson 4*

DO: **ACTIVITY:** *Food Allergy Management Plan Outline – Lesson 4*

Materials:
- Food Allergy Management Plan Outline

Time: 10 minutes

Instructions: Tell participants to get the *Food Allergy Management Plan Outline*. Give participants 10 minutes to fill in *Food Allergy Education for Children and Families and Healthy and Safe Educational Environment* sections of the outline.

SAY: Please get the *Food Allergy Management Plan Outline*. Find the *Food Allergy Education for Children and Families and Healthy and Safe Educational Environment* sections. Fill out these sections according to your school; if you have multiple schools, choose one to focus on.

<table>
<thead>
<tr>
<th>Food Allergy Management Plan Outline</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Food Allergy Education for Children and Families</strong></td>
</tr>
<tr>
<td><strong>Task</strong></td>
</tr>
<tr>
<td>Educate children</td>
</tr>
<tr>
<td>Educate family members</td>
</tr>
</tbody>
</table>

| **Healthy and Safe Educational Environment** |
| **Task** | **Stakeholders Involved** | **Roles** | **Notes** |
| Anti-bullying policy |  |  |  |
| Not singling out child |  |  |  |
| Managing food outside of the cafeteria |  |  |  |
SHOW SLIDE:  *Lesson 4 Review*

**SAY:** We are now finished with our fourth lesson – Managing Food Allergies in Schools. We have covered ways to successfully manage food allergies in schools by:

- Recognizing laws for accommodating students with food allergies.
- Describing strategies for working with stakeholders to meet the needs of students with allergies.
- Determine strategies to manage food prepared and served outside of the cafeteria.

**ASK:** Do you have any questions?
# Lesson 5: Food Allergy Management Plan

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>Analyze the roles of various stakeholders in food allergy management at a school.</td>
<td>Food Allergy Tabletop Exercise</td>
<td>• Food Allergy Tabletop Exercise&lt;br&gt;• Food Allergy Tabletop Exercise handout</td>
<td>160 minutes</td>
</tr>
<tr>
<td>Finalize an outline of a food allergy management plan.</td>
<td>Outline a Food Allergy Management Plan</td>
<td>• CDC Guidelines for Managing Food Allergies handout&lt;br&gt;• Food Allergy Management Plan Outline</td>
<td>35 minutes</td>
</tr>
</tbody>
</table>
Lesson 5: Food Allergy Management Plan

SHOW SLIDE: Lesson 5: Food Allergy Management Plan

SAY: In this lesson, we will discuss the impact an allergic reaction can have on a school and how to begin developing a food allergy management plan for your school nutrition program. Now we are going to walk through a mock scenario of an allergic reaction incident which occurs in a school.

OBJECTIVE: Analyze the roles of various stakeholders in food allergy management at a school.

SHOW SLIDE: Food Allergy Tabletop Exercise

SAY: It is important to work with your partners when creating a food allergy management plan for a child with allergies. It may be helpful to have meetings to discuss strategies and needs for the child. This will help in the case of an emergency situation involving a food allergy.

DO: ACTIVITY: Food Allergy Tabletop Exercise

Materials:
- Food Allergy Tabletop Exercise handout
- Food Allergy Tabletop Exercise (slide presentation)
- Flip chart paper
- Markers

Time: 160 minutes

Instructions: Participants will be broken into groups of six (6). The instructor will guide the participants through the scenario using the slide presentation and reading the full story to go along with the highlighted points on the slides. One slide will present the scene, and the following slide will have discussion questions. Each participant should respond to the discussion questions from the perspective of their own school and then discuss as a group.

Instructor’s Note: Because there will be many “report-in” opportunities, encourage each group to rotate the group discussion/sharing responsibilities among the group members.

Also, the beginning scenarios tend to go slower, but as the participants become more familiar with the format, the exercise will go a bit faster. Scenarios with fewer questions tend to go faster than those with more.
SAY: We are going to do a tabletop exercise involving a food allergy mock incident. This incident is meant to help you think about all the stakeholders involved in food allergy management in school. Please turn to the Food Allergy Tabletop Exercise handout in your Participant’s Workbook. You have the scenario and questions for the scenario in this handout. I will break you into groups of six (6) and walk you through each scene. You will have 3–5 minutes to answer the questions from the perspective of your school policies and then 3–5 minutes to discuss answers with your group. We will then have a short discussion after each scenario.

DO: Put the participants in groups of six (6), and walk them through a scenario of an allergic reaction that occurred outside of the cafeteria. Read the scenario in the Instructor’s Manual and change the slides as guided below. Give the groups about 10–20 minutes for each scenario. It will take 2 hours or more to go through the exercise depending on the amount of group discussion.

Food Allergy Tabletop Exercise

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

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

SHOW SLIDE: Friday, October 6 – 1:47 pm Scene

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

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

SHOW SLIDE: Friday, October 6 – 1:47 pm Questions

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK: Now that you have had a chance to discuss the scenario, would some people like to give their responses?

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

- As such, do they have access to student information, including approved reasonable modifications, IEPs, 504 plans, or allergy action plans? If so, do they know where these documents are kept?
- If they have access to student information, are they authorized to have any of this information with them on the vehicle? In what form?

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

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

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

DO: Pause after each question and allow participants to answer.

SHOW SLIDE:  *Friday, October 6 – 1:51 pm Scene*

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

SHOW SLIDE:  *Friday, October 6 – 1:51 pm Questions*

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK:
1. Is medical emergency/allergy response training offered to school transportation officials in your school district?
   - Who provides the training?

2. Are bus drivers trained in how to recognize and manage any emergency inside the vehicle that requires their immediate attention?

3. Are medical emergency and safety trainings provided to all school personnel to include how to recognize and treat allergic reactions?

4. Are transportation assistants or patrols employed in your school district?
   - Have they received training?

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

DO: Pause after each question and allow participants to answer.
SHOW SLIDE:  *Friday, October 6 – 1:52 pm Scene*

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

SHOW SLIDE:  *Friday, October 6 – 1:52 pm Questions*

**DO:** Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

**ASK:**
1. Who should call 9-1-1 in a food allergy emergency, and by what method (personal phone, work phone, radio to school, etc.)?
2. Does your school district have procedures in place to handle medical emergencies while students are on buses?
3. How frequently are communications devices checked to ensure they are in working order?
   - Are bus drivers and schools aware of any areas with poor reception?

**DO:** Pause after each question and allow participants to answer.

SHOW SLIDE:  *Friday, October 6 – 1:53 pm Scene*

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

SHOW SLIDE:  *Friday, October 6 – 1:53 pm Questions*

**DO:** Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

**ASK:**
1. If there is a medical emergency on a bus in your school district, who will explain the situation to the students on the bus?
   - What will they do to assure and calm students?
2. Who will explain the situation to parents or guardians who may be meeting their children at the bus stop?
   - What information can be shared, and what information must be protected?

**DO:** Pause after each question and allow participants to answer.

SHOW SLIDE:  *Friday, October 6 – 1:54 pm Scene*

**SAY:** Administrative staff at Zinnia Glade Elementary School contacts Celia’s parents or guardians immediately and informs them that emergency personnel are on the way to the reported location of Bus 715.
SHOW SLIDE:  *Friday, October 6 – 1:54 pm Questions*

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK:
1. Is there a procedure for contacting parents or guardians in an emergency?
   - Does the party responsible for contacting the parents or guardians have immediate access to emergency contact information?
2. Will school staff be able to tell parents or guardians which medical facility the student will be transported to?

DO: Pause after each question and allow participants to answer.

SHOW SLIDE:  *Friday, October 6 – 1:58 pm Scene*

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

SHOW SLIDE:  *Friday, October 6 – 1:58 pm Questions*

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

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

DO: Pause after each question and allow participants to answer.

SHOW SLIDE:  *Friday, October 6 – 2:00 pm Scene*

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

SHOW SLIDE:  *Friday, October 6 – 2:00 pm Questions*

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.
ASK:
1. If this situation occurs in your school district, will someone accompany the student in the ambulance?
2. If your district authorizes the use of transportation aides, what role would they play in this situation?

DO: Pause after each question and allow participants to answer.

SHOW SLIDE: **Friday, October 6 – 2:15 pm Scene**

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

SHOW SLIDE: **Friday, October 6 – 2:15 pm Questions**

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

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

DO: Pause after each question and allow participants to answer.

SHOW SLIDE: **Tuesday, October 10 – 8:30 am Scene**

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

SHOW SLIDE: **Tuesday, October 10 – 8:30 am Questions**

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK:
1. Would the school nutrition program have the documentation of Celia’s severe allergy to soy?
   • Where is it located?
2. Does your school have detailed point of sale records that indicate which meals or a la carte items were purchased by students?
   • Is it easily accessible by school authorities?
   • How long is this information kept on file?
3. Has your school district provided notice to families that it does not discriminate on the basis of disability in its programs and activities?

4. Does your school district provide special meals (reasonable modification), at no extra charge, to students whose allergy or disability impacts their diet?

DO: Pause after each question and allow participants to answer.

SHOW SLIDE:  **Tuesday, October 10 – 9:15 am Scene**

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

SHOW SLIDE:  **Tuesday, October 10 – 9:15 am Questions**

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK:

1. What procedure does your school district use to identify students with severe food allergies during meal service?
   • How often are procedures and records reviewed?

2. Does your school district have a procedure in place for parents or guardians to request a reasonable modification(s) to accommodate food allergies?
   • Are members of the school staff trained on these procedures?
   • How are these procedures communicated to parents or guardians?

3. Has your school district designated a person to coordinate compliance with disability civil rights requirements?
   • Is there a grievance procedure available to families to resolve complaints of non-compliance?
   • Has notice been provided to students and families identifying the coordinator and explaining the complaints procedures?

DO: Pause after each question and allow participants to answer.

SHOW SLIDE:  **Tuesday, October 10 – 2:00 pm Scene**

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

SHOW SLIDE:  **Tuesday, October 10 – 2:00 pm Questions**

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.
ASK:

1. Does your school nutrition staff routinely review incoming product labels for ingredient changes and possible presence of food allergens?
   - Is this activity part of a Standard Operating Procedure?
2. Are product labels retained for future reference?
   - For how long?
3. Does your school nutrition management have a relationship with its distributors or vendors that would include a notification of ingredient changes made by suppliers, especially when major food allergens are involved?
   - Are distributors or vendors willing and/or able to provide alternative meals for students with food allergies and disabilities?
4. Does your school require vendors to provide notice of formula changes?

DO: Pause after each question and allow participants to answer.

SHOW SLIDE: Conclusion Scene

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

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

SHOW SLIDE: Conclusion Questions

DO: Give participants 3–5 minutes to answer the questions individually and then 3–5 minutes to discuss in groups.

ASK:

1. Are all school officials, including the school nutrition department, aware of the Federal laws that mandate meal accommodations for students with food-related disabilities?
2. Is yearly training provided on meal accommodations and food safety to prevent cross contact and cross contamination of foods?
3. Where might the breakdown in communication have been that allowed Celia to be served, or to take food items from the lunch line or a la carte that she should have avoided?
4. What processes and procedures could be put into place to avoid this situation?
5. What after-action procedures, or review of procedures after an emergency incident, are in place at your school?
6. Is your school prepared for an emergency like this?
Instructor’s Manual

DO: Pause after each question and allow participants to answer.

SAY: This tabletop exercise was designed to help you think through an allergic reaction at your school environment. Hopefully it has shown you some places where you can strengthen your food allergy management program. We will now go into more detail about developing and strengthening your food allergy management plan.

OBJECTIVE: Finalize an outline for a food allergy management plan.

SHOW SLIDE: Preparation is the Key to Success

SAY: Some of you might have been Scouts (Girl Scout or Boy Scout).

ASK: Do you remember the motto?

FEEDBACK: Responses may vary; the motto is “Be Prepared.”

SAY: Managing food allergies requires you to “Be Prepared.” 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. Quickly administer medication or call emergency services. Delay could result in deadly consequences.

ASK:
• What is your role?
• What is the role of other school nutrition staff members?
• Who else in school would be involved with a food allergic reaction emergency?

SAY: The Institute of Child Nutrition has developed the Manager’s Corner: Food Allergies resource to assist you in teaching your training about food allergies. It contains several short, roughly 15-minute training lessons that reflect the day-to-day practices for food allergy management. During staff training, you could do a role-playing exercise to play out what would happen during an emergency. At the end of the role-play, take a few minutes to review with those involved what went smoothly and what needs improvement. This activity should be done soon after the emergency to capture the details. Perhaps you have a Standard Operating Procedure (SOP) on how to handle an emergency; however, after an emergency the SOP may need to be updated.

ASK:
• Are you prepared to react to a severe allergic reaction?
• What role would you play in this situation?
• What role would your staff play?
• What steps have you already taken to protect children with food allergies?
• Who all is needed to create and review this plan?
SHOW SLIDE:  *Finalize Your Food Allergy Management Plan Outline Activity*

DO:  **ACTIVITY:** Finalize Your Food Allergy Management Plan Outline

**Materials:**
- Food Allergy Management Plan Outline worksheet
- CDC Guidelines for Managing Food Allergies handout

**Time:** 15 minutes of individual work. 20 minutes of partner work.

**Instructions:** Participants will finalize their Food Allergy Management Plan Outline worksheet. They can use the CDC Guidelines for Managing Food Allergies handout to find any areas they may have excluded. After 15 minutes of individual work, participants will partner up and review each other’s plan for about 20 minutes.

**SAY:** Please pull out your Food Allergy Management Plan Outline. We have discussed a lot of different parts of how to manage food allergies in schools in this training. We are going to take some time to allow everyone take finalize their food allergy management plan outlines, or look at where you can strengthen your existing plan.

You will have 15 minutes to think of some components of a food allergy management plan for your particular school. Then we will partner up and help each other fill in any gaps. You can use the CDC Guidelines for Managing Food Allergies handout to help you create your outline.

**DO:** Allow participants 15 minutes to fill in the components of a Food Allergy Management Plan Outline handout. Allow 20 minutes for class discussion.

**SHOW SLIDE: Lesson 5 Review**

**SAY:** We are now finished with our fifth lesson – Food Allergy Management Plan. We have:
- Analyzed the roles of various stakeholders in food allergy management at a school.
- Finalized an outline of a food allergy management plan.

**ASK:** Do you have any questions?
## Wrap-up

<table>
<thead>
<tr>
<th>Objective</th>
<th>Activity</th>
<th>Materials</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Make It Stick</td>
<td>• Flip chart paper&lt;br&gt;• Markers&lt;br&gt;• Sticky notes&lt;br&gt;• Pen or pencil&lt;br&gt;• Food Allergy Resources handout</td>
<td>20 minutes</td>
</tr>
<tr>
<td></td>
<td>Post-Assessment</td>
<td>• Post-Assessment&lt;br&gt;• Course Evaluations</td>
<td>10 minutes</td>
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</tbody>
</table>
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.

**SHOW SLIDE:** *Make It Stick*

**DO:** **ACTIVITY:** *Make It Stick*

**Materials:**
- Flip chart paper
- Markers
- Sticky notes
- Pen or pencil
- *Food Allergy Management Plan Outline* worksheet

**Time:** 5 minutes of walking around. 5 minute of individual work. 10 minutes of class discussion.

**Instructions:** On the piece of flip chart paper, write the question, “What is the first food allergy task that I plan on doing when I get back?” Ask participants to walk around the room and take a look at what was covered in the training. Then have participants write their answers on sticky notes and stick them on the flip chart paper. Also, have the participants write their answer at the top of the *Food Allergy Management Plan Outline* worksheet. Read out responses, acknowledging repeated responses, but not necessarily reading all of them.

**SAY:** Please take a second and walk around the room to review all the items we have discussed today and gather your thoughts.

**DO:** Allow participants 5–10 minutes to wander around the room to the different flip charts.

**SAY:** Please return to your seats. On a sticky note, write your answer to this question, “What is the first food allergy task that I plan on doing when I get back?” Then, write your answer on the top of the *Food Allergy Management Plan Outline*, and put your sticky note up here on the flip chart paper.

**DO:** Allow 5 minutes for participants to write their answers and bring them up. Spend 10 minutes reading out responses to the group.

**SAY:** In your Participant’s Workbook, there is list of resources about food allergies. You can use these resources to help educate your staff and school about food allergies.
Food Allergy Resources

Manuals
- Centers for Disease Control and Prevention. *Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education 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/
- NEA Health Information Network
- United States Department of Agriculture, Food and Nutrition Service
  https://www.fns.usda.gov/ofn/food-safety

ICN Resources
- Food Allergy Resources: www.theicn.org/foodsafety
- Food Allergy Fact Sheets: www.theicn.org/foodsafety
- Food Allergy Mini-poster: www.theicn.org/foodsafety
- Food Safety Standard Operating Procedures: https://theicn.org/icn-resources-a-z/standard-operating-procedures/

SHOW SLIDE: **Manager’s Corner – Food Allergies**

SAY: ICN created a resource for you for training your staff on the food allergy topics you learned today. *Manager’s Corner: Food Allergies* is designed to give directors/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 director/manager

SHOW SLIDE:  *Post-Assessment*

SAY: We have just a few more things to do before today’s class comes to an end. I will have you do the post-assessment, complete a course evaluation, and we’ll be sure everyone signed the roster. Please make sure to put the identifier that you used for the pre-assessment in the top right corner.

DO: **ACTIVITY: Post-Assessment**

Materials:
• Post-Assessment

Time: 10 minutes of individual work

Instructions: Pass out post-assessment out to participants. Remind them to write their identifier. Allow time for participants to take the post-assessment, and then pick them back up.

SAY: I will now pass out the post-assessment. Answer the questions to the best of your ability. We have gone over all of the content during the session.

DO: Refer to answer key in the Instructor’s Manual and review answer for each question.

SHOW SLIDE:  *Training Wrap-Up*

ASK: What questions may I answer for you?

DO: Provide participants the course evaluation form. Make sure all participants have signed the attendee roster. Provide attendees 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 have access to important, timely, and expertly designed resources. Numerous food allergy, food safety, food security, and emergency management resources are available to download for free from www.theicn.org.

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

Ingredient Statement Print-Outs
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
Food Allergies for School Nutrition Directors     Instructor's Manual

Institute of Child Nutrition
Label B

INGREDIENTS: SALT, MONOSODIUM GLUTAMATE, MALTODEXTRIN, GARLIC, ONION, PARSLEY, SPICE, CARRAGEENAN, CALCIUM STEARATE, 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.
Information: has wheat 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, DISTILLLED VINEGAR, VEGETABLE OIL (SOYBEAN AND/OR CANOLA), CIDER VINEGAR, ROMANO CHEESE (CULTURED MILK, SALT, ENZYMES), SUGAR, GARLIC*, EXTRA VIRGIN OLIVE OIL, CONTAINS LESS THAN 2% OF: OMEGA 3 [FISH OIL AND FISH GELATIN (CONTAINS TILAPIA, SARDINE AND ANCHOVY)], ANCHOVY (FISH), LEMON JUICE CONCENTRATE, SPICE, SALT, FERMENTED WHEAT PROTEIN, YEAST EXTRACT, MALTODEXTRIN, XANTHAN GUM, PROPYLENE GLYCOL ALGINATE, POTASSIUM SORBATE, SODIUM BENZOATE AND CALCIUM DISODIUM EDTA AS PRESERVATIVES. *DRIED.
Label F
BEEF, WATER, TEXTURED SOY PROTEIN, EGGS, DEHYDRATED ONION, GARLIC, SPICES, BREAD CRUMBS, WHEY
ALLERGIES: CONTAINS EGGS, MILK, AND WHEAT
References


The University of Mississippi
School of Applied Sciences
800-321-3054
www.theicn.org