

- Promote good hand-washing practices before and after eating.
- Supervise children closely during mealtimes. Consider assigned seating for meals, especially in situations with family-style dining. Emphasize that children not share food.
- Put children’s names on cups, plates, and utensils to avoid confusion and cross-contact.
- Designate food storage areas for foods brought from home.<sup>6, 45, 77</sup>

**c. Make outside groups aware of food allergy policies and rules when they use school or ECE program facilities before or after hours.**

Local agencies, community groups, and community members who use school or ECE program facilities before or after operating hours should be aware of and comply with policies on food, cleaning, and sanitation procedures. If food is allowed in the building, consider banning food from specific classrooms or areas that children with food allergies use often. School and ECE program staff should be notified when outside groups are using their facilities.

**d. Create a positive psychosocial climate.**

Schools and ECE programs should foster a climate that promotes positive psychological and social development; that actively promotes safety, respect, and acceptance of differences; and fosters positive interpersonal relationships between staff members and children and between the children themselves. The psychosocial climate is influenced by clear and consistent disciplinary policies, meaningful opportunities for participation, and supportive behaviors by staff members and parents.<sup>78</sup>

Children with food allergies need an environment where they feel secure and can interact with caring people they trust. Bullying, teasing, and harassment can lead to psychological distress for children with food allergies which could lead to a more severe reaction when the allergen is present.<sup>22, 43, 44</sup> A positive psychosocial climate—coupled with food allergy education and awareness for all children, families, and staff members—can help remove feelings of anxiety and alienation among children with food allergies.<sup>43, 44</sup>

To create a positive psychosocial climate, staff members, children, and parents must all work together. School nurses, school counselors, or mental health consultants can provide leadership and guidance to set best practices and strategies for a positive psychosocial climate. Staff members should promote and reinforce expectations for a positive and supportive climate by making sure the needs of children with food allergies are addressed. For example, they can avoid using language and activities that isolate children with food allergies and encourage everyone’s help in keeping the classroom safe from food allergens. Children can help develop classroom rules, rewards, and activities.

All children and staff members share responsibility for preventing bullying and social isolation of children with food allergies. School and ECE program staff should recognize that acceptance by peers is one of the most important influences on a child’s emotional and social development.<sup>78</sup> Among adolescents, food allergy education and awareness can be an effective strategy to improve social interactions, reduce peer pressure, and decrease risk-taking behaviors that expose them to food allergens.<sup>22</sup> Children should be expected to treat others with respect and to be good citizens, not passive bystanders, when they are aware of bullying or peers who seem troubled. Children should understand the positive or negative consequences associated with their actions. Rules and policies against bullying behavior should be developed in partnership with staff members, families, and children. They should be posted in buildings; published in school handbooks; and discussed with staff members, children, and families. All children and staff members should be encouraged to report bullying and harassment of any child with food allergies.<sup>80, 81</sup>

## **Conclusion**

Schools and ECE programs are responsible for the health and safety of children with food allergies. The strategies presented in these guidelines can help schools and ECE programs take a comprehensive approach to managing food allergies. Through the collective efforts of school and ECE program staff members, parents, and health care providers, children with food allergies can be assured a safe place to thrive, learn, and succeed.

**Table 1. Recommended Practices for Reducing the Risk of Exposure to Food Allergens and Responding to Food Allergies in Schools and ECE Programs**

	<b>Classroom</b>	<b>Cafeteria</b>	<b>Transportation</b>	<b>School or ECE Program Events (Field Trips, Activities Before or After School)</b>	<b>Physical Education and Recess</b>
<b>School or ECE Program Policy or Environment</b>	<ul style="list-style-type: none"> <li>Consider designated allergy-friendly seating arrangements.</li> <li>Avoid the use of identified allergens in class projects, parties, holidays and celebrations, arts, crafts, science experiments, cooking, snacks, or rewards. Modify class materials as needed.</li> <li>Avoid ordering food from restaurants because food allergens may be present, but unrecognized.</li> <li>Have rapid access to epinephrine auto-injectors in cases of food allergy emergency and train staff to use them.</li> </ul>	<ul style="list-style-type: none"> <li>Consider designated allergy-friendly seating during meals (open to any child eating foods free of identified allergens).</li> <li>Have rapid access to epinephrine auto-injectors in cases of food allergy emergency and train staff to use them.</li> </ul>	<ul style="list-style-type: none"> <li>Train transportation staff in how to respond to food allergy emergencies.</li> <li>Have rapid access to epinephrine auto-injectors in cases of food allergy emergency and train staff to use them.</li> </ul>	<ul style="list-style-type: none"> <li>When planning a field trip, find out if the location is safe for children with food allergies.</li> <li>Make sure that events and field trips are consistent with food allergy policies.</li> <li>Do not exclude children with food allergies from field trips, events, or extra-curricular activities.</li> <li>Invite, but do not require, parents of children with food allergies to accompany their child in addition to the regular chaperone.</li> <li>Have rapid access to epinephrine auto-injectors in cases of food allergy emergency and train staff to use them.</li> </ul>	<ul style="list-style-type: none"> <li>Do not exclude children with food allergies from physical education or recess activities.</li> <li>Have rapid access to epinephrine auto-injectors in cases of food allergy emergency and train staff to use them.</li> </ul>

**Table 1. (continued)**

	<b>Classroom</b>	<b>Cafeteria</b>	<b>Transportation</b>	<b>School or ECE Program Events (Field Trips, Activities Before or After School)</b>	<b>Physical Education and Recess</b>
<p><b>Meals and Snacks</b></p> <ul style="list-style-type: none"> <li>• Use nonfood incentives for prizes, gifts, and awards.</li> <li>• Help students with food allergies read labels of foods provided by others so they can avoid ingesting hidden food allergens.</li> <li>• Consider methods (such as assigned cubicles) to prevent cross-contact of food allergens from lunches and snacks stored in the classroom.</li> <li>• Support parents of children with food allergies who wish to provide safe snack items for their child in the event of unexpected circumstances.</li> <li>• Encourage children to wash hands before and after handling or consuming food.</li> <li>• Include information about children with special needs, including those with known food allergies, in instructions to substitute teachers.</li> </ul>	<ul style="list-style-type: none"> <li>• Make reasonable meal accommodations after receiving approval from a doctor or allergist through dietary orders or as stated in the child's Emergency Care Plan (ECP). For more information, see the USDA Web site.<sup>a</sup></li> <li>• With parental cooperation, create standard procedures for identifying children with food allergies. For example, a recent picture of each child could be kept in a location that is not visible to other children or the public. Procedures must follow the requirements in FERPA. (See Section 5 for more information about FERPA.)</li> <li>• Designate an allergen-safe food preparation area.</li> <li>• Provide advanced copies of menus for parents to use in planning.</li> <li>• Be prepared to share food labels, recipes, or ingredient lists used to prepare meals and snacks with others.</li> </ul>	<ul style="list-style-type: none"> <li>• Do not allow food to be eaten on buses except by children with special needs such as those with diabetes.</li> <li>• Encourage children to wash hands before and after handling or consuming food.</li> </ul>	<ul style="list-style-type: none"> <li>• Identify special needs before field trips or events.</li> <li>• Package meals and snacks appropriately to prevent cross-contact.</li> <li>• Encourage children to wash hands before and after handling or consuming food.</li> </ul>	<ul style="list-style-type: none"> <li>• Encourage hand washing before and after handling or consuming food.</li> </ul>	

**Table 1. (continued)**

	Classroom	Cafeteria	Transportation	School or ECE Program Events (Field Trips, Activities Before or After School)	Physical Education and Recess
<p><b>Meals and Snacks</b></p>		<ul style="list-style-type: none"> <li>• Keep food labels from all foods served to children with allergies for at least 24 hours after servicing the food in case the child has a reaction.</li> <li>• Keep current contact information for vendors and suppliers so you can get food ingredient information.</li> <li>• Read all food labels and recheck with each purchase for potential food allergens.</li> <li>• Report mistakes such as cross-contact with an allergen or errors in the ingredient list or menu immediately to administrators and parents.</li> <li>• Wash all tables and chairs with soap and water or all-purpose cleaning agents before each meal period.</li> <li>• Encourage children, school staff, and volunteers to wash hands before and after handling or consuming food.</li> </ul>			

<sup>a</sup> USDA Web site: [www.fns.usda.gov/cnd/guidance/special\\_dietary\\_needs.pdf](http://www.fns.usda.gov/cnd/guidance/special_dietary_needs.pdf).

## Food Allergy Management and Prevention Plan Checklist

Use this checklist to determine if your school or ECE program has appropriate plans in place to promote the health and well-being of children with food allergies. For each priority, check the box to the left if you have plans and practices in place. Develop plans to address the priorities you did not check.

You can also use the checklist to evaluate your response to food allergy emergencies. Ongoing evaluation and improvement can help you improve your plans and actions.

Review the full descriptions of the five priorities (pages 25-40) to make sure that your plans and practices are complete and that your plans for improvement will meet the needs of children, their families, administrators, and staff.

Check If You Have Plans or Procedures	<b>Priorities for a Food Allergy Management and Prevention Plan</b>
<b>1. Does your school or ECE program ensure the daily management of food allergies for individual children by:</b>	
<input type="checkbox"/>	Developing and using specific procedures to identify children with food allergies?
<input type="checkbox"/>	Developing a plan for managing and reducing risks of food allergic reactions in individual children through an Emergency Care Plan (Food Allergy Action Plan)?
<input type="checkbox"/>	Helping students manage their own food allergies? (Does not apply to ECE programs.)
<b>2. Has your school or ECE program prepared for food allergy emergencies by:</b>	
<input type="checkbox"/>	Setting up communication systems that are easy to use in emergencies?
<input type="checkbox"/>	Making sure staff can get to epinephrine auto-injectors quickly and easily?
<input type="checkbox"/>	Making sure that epinephrine is used when needed and that someone immediately contacts emergency medical services?
<input type="checkbox"/>	Identifying the role of each staff member in a food allergy emergency?
<input type="checkbox"/>	Preparing for food allergy reactions in children without a prior history of food allergies?
<input type="checkbox"/>	Documenting the response to a food allergy emergency?
<b>3. Does your school or ECE program train staff how to manage food allergies and respond to allergy reactions by:</b>	
<input type="checkbox"/>	Providing general training on food allergies for all staff?
<input type="checkbox"/>	Providing in-depth training for staff who have frequent contact with children with food allergies?
<input type="checkbox"/>	Providing specialized training for staff who are responsible for managing the health of children with food allergies on a daily basis?
<b>4. Does your school or ECE program educate children and family members about food allergies by:</b>	
<input type="checkbox"/>	Teaching all children about food allergies?
<input type="checkbox"/>	Teaching all parents and families about food allergies?
<b>5. Does your school or ECE program create and maintain a healthy and safe educational environment by:</b>	
<input type="checkbox"/>	Creating an environment that is as safe as possible from exposure to food allergens?
<input type="checkbox"/>	Developing food-handling policies and procedures to prevent food allergens from unintentionally contacting another food?
<input type="checkbox"/>	Making outside groups aware of food allergy policies and rules when they use school or ECE program facilities before or after operating hours?
<input type="checkbox"/>	Creating a positive psychosocial climate that reduces bullying and social isolation and promotes acceptance and understanding of children with food allergies?

## Section 2.

# Putting Guidelines into Practice: Actions for School Boards and District Staff

This section presents the actions that school district leaders can take to implement the voluntary recommendations in Section 1. Although the focus of the recommendations is on the management of food allergies at the school building level, district-level leadership and policy and staff support are essential for the success of school-level food allergy management.

### School District Policy Support

School boards can adopt written policies that direct and support clear, consistent, and effective practices for managing the risk of food allergies and response to food allergy emergencies. Data from CDC's 2006 *School Health Policies and Programs Study* indicate that only slightly more than 40% of school districts have model food allergy policies.<sup>8</sup>

A comprehensive and uniform set of district policies for managing food allergies in schools can:

- Communicate the district's commitment to effectively managing food allergies to school administrators and staff members, parents, and the community.
- Promote consistency of priorities, actions, and options for managing food allergies across the district to avoid confusion and haphazard responses.
- Align food allergy management plans in schools with federal and state laws, including regulations, and policies, as well as other established school policies.
- Make protective practices and strategies for managing food allergies in schools an integral part of ongoing school activities.
- Support the food allergy management decisions and practices of school administrators and staff members.
- Increase public knowledge about food allergies and applicable laws and public support for implementation of effective food allergy management practices in schools.<sup>82-85</sup>

Section 6 provides a list of resources with more information and strategies to inform school policymakers.

### School District Staff Support

District policies are implemented with the support of board members, the district superintendent, and district-level staff members.<sup>82</sup> District leaders and staff can:

- Communicate policy requirements and school system directives.
- Help schools implement and comply with applicable federal and state laws, including regulations, and policies.
- Help communicate lines of authority for managing food allergies in school buildings.

- Provide standardized forms, procedures, tools, and plans, including a sample Food Allergy Management and Prevention Plan (FAMPP), to schools.
- Coordinate training to improve consistency of practices across the district.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, during class parties, at athletic events, and during after-school programs.
- Help schools plan and implement their FAMPPs.

District staff might also provide direct assistance to schools to help them meet the needs of students with food allergies, especially when the school does not have key staff, such as a doctor or full-time registered nurse, working at the building level. District staff sometimes communicate directly with parents and doctors who might need additional information about a school's food allergy policies and practices. They also may communicate directly with parents whose children need help managing their food allergy as they move from one school to the next within the district.

## School Board Members

### ***1. Set the direction for the school district's coordinated approach to managing food allergies.***

- Develop a comprehensive set of school district policies to manage food allergies in school settings. Work with a variety of school staff, including school administrators, Section 504 coordinators, licensed health care professionals (e.g., doctors, registered nurses), school health advisory council members, teachers, paraeducators, school food service staff, bus drivers and other transportation staff, custodians and maintenance staff, after-school program staff, students, parents, community experts, and others who will implement policies. Section 6 provides a list of resources with more information and strategies to inform school policymakers.
- Align food allergy policies and practices with the district's "all-hazards" approach to emergency planning and with policies on the care of students with chronic health conditions.
- Be familiar with federal and state laws, including regulations, and policies relevant to the obligations of schools to students with food allergies and make sure local school policies and practices follow these laws and policies.
- Use multiple mechanisms, such as newsletters and Web sites, to disseminate and communicate food allergy policies to appropriate district staff, families, and the community.
- Give parents and students information about the school district's procedures they can use if they disagree with the food allergy policies and plans implemented by the school district.
- On a regular schedule, review and evaluate the district's food allergy-related policies and revise as needed.



## ***2. Prepare for food allergy emergencies.***

- Make sure that responding to life-threatening food allergy reactions is part of the school district’s “all-hazards” approach to emergency planning.
- Support and allocate resources to trained and appropriately certified or licensed staff members to respond to food allergy emergencies in all schools.
- Review data and information (e.g., when and where medication was used) from incident reports of food allergy reactions and assess the effect of the incident on all students involved. Modify your policies as needed.

## ***3. Support professional development on food allergies for staff.***

- Support and allocate resources and time for professional development and training on food allergies.
- Identify professional development and training needs to make sure that district and school staff, especially those on food allergy management teams, are adequately trained, competent, and confident to perform assigned responsibilities to help students with life-threatening food allergies and respond to an emergency.

## ***4. Educate students and family members about food allergies.***

- Encourage the inclusion of information about food allergies in the district’s health education or other curriculum for students to raise awareness.
- Support and allocate resources for awareness education for students and parents.

## ***5. Create and maintain a healthy and safe school environment.***

- Endorse the use of signs and other strategies to increase awareness about food allergies throughout the school environment.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, during class parties, at athletic events, and during after-school programs.
- Support collaboration with district and community experts to integrate the management of food allergies with the management of other chronic health conditions.
- Support collaboration with district and community experts to make sure schools have healthy and safe physical environments.
- Develop and consistently enforce policies that prohibit discrimination and bullying against all students, including those with food allergies.

## School District Superintendent

### **1. Lead the school district's coordinated approach to managing food allergies.**

- Provide leadership and designate school district resources to implement the school district's comprehensive approach to managing food allergies.
- Promote, disseminate, and communicate food allergy-related policies to all school staff, families, and the community.
- Make sure that each school has a team that is responsible for food allergy management.
- Be familiar with federal and state laws, including regulations, and policies relevant to the obligations of schools to students with food allergies and make sure your policies and practices follow these laws and policies.
- Give parents and students information about the school district's procedures they can use if they disagree with the food allergy policies and plans implemented by the school district.
- On a regular schedule, review and evaluate the school district's food allergy policies and practices and revise as needed.
- Establish evaluation strategies for determining when the district's food allergy policies and practices or the school's FAMPP are not effectively implemented.

### **2. Prepare for food allergy emergencies.**

- Make sure that responding to life-threatening food allergy reactions is part of the school district's all-hazards approach to emergency planning.
- Make sure that each school has trained and appropriately certified or licensed staff members develop and implement written Emergency Care Plans (ECPs) for students with food allergies. Additional plans can include Individualized Healthcare Plans (IHPs), Section 504 plans, or, if appropriate, Individualized Education Programs (IEPs).
- Encourage periodic emergency response drills and practice on how to handle a food allergy emergency in schools.
- Review data and information (e.g., when and where medication was administered) from incident reports of food allergy reactions and assess the effect of the incident on all students involved. Modify policies as needed.

### **3. Support professional development on food allergies for staff.**

- Make sure that district and school staff, especially those responsible for implementing the FAMPP, have professional development and training opportunities to become adequately trained, competent, and confident to perform assigned responsibilities to help students with food allergies and respond to an emergency.

#### ***4. Educate students and family members about food allergies.***

- Help ensure that information about food allergies is included in the district's health education curriculum for students to raise awareness.
- Communicate with parents about the district's policies and practices to protect the health of students with food allergies.

#### ***5. Create and maintain a healthy and safe school environment.***

- Increase awareness of food allergies throughout the school environment.
- Collaborate with school board members, school administrators, and other school staff to create a safe environment for students with food allergies. Provide oversight of schools with children who have food allergies.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, during class parties, at athletic events, and during after-school programs.
- Consistently enforce policies that prohibit discrimination and bullying against all students, including those with food allergies.

### **Health Services Director**

The health services director can be a doctor or registered nurse working at the district level.

#### ***1. Participate in the school's coordinated approach to managing food allergies.***

- Help develop a school district's comprehensive approach to managing life-threatening food allergies that will support the FAMPP used in each school.
- Provide leadership and obtain the resources needed to implement the district's comprehensive approach to managing food allergies.
- Promote, disseminate, and communicate the food allergy policies and practices to all school staff, families, the school community, and the local medical community.
- Know and educate others about federal and state laws, including regulations and policies relevant to the obligations of schools to students with food allergies and make sure policies and practices follow these laws.
- Make sure a doctor or registered nurse reviews all FAMPPs and ECPs. Create other plans as needed.
- Provide direct assistance to help schools develop procedures and plans for monitoring students with food allergies, including, if appropriate, through Section 504 plans, or IEPs.
- Coordinate with other district staff, including the food service director, curriculum coordinator, and student support services director.

- Make sure that food allergy policies and practices address competitive foods (foods and beverages sold outside of the federal reimbursable school meals program), such as those available in vending machines, in school stores, during class parties, at athletic events, and during after-school programs.
- On a regular schedule, review and evaluate the school district’s food allergy policies and practices and revise as needed.

## **2. Ensure the daily management of food allergies for individual students.**

- Help the school team responsible for the FAMPP write this plan. If a student is eligible to receive services under Section 504 or, if appropriate, IDEA, make sure all provisions of these federal laws are met.
- Create standard forms, such as health forms, school registration forms, and ECPs, for schools to use to identify students<sup>e</sup> with food allergies and develop individual management plans for them. Establish protocols for tasks related to developing management plans, such as how to interview parents, get appropriate documentation from doctors, and coordinate meals with food service staff.
- Help schools implement policies and procedures for managing student medications. These policies should include how epinephrine auto-injectors are stored and accessed, how their use is monitored, and the schedule for regularly inspecting auto-injector expiration dates. They should also include plans for supporting students who are permitted and capable of managing their own food allergies by carrying and using epinephrine auto-injectors.
- Help schools that do not have a registered nurse on site develop plans to manage food allergies in individual students, provide health services when needed, and respond to food allergy emergencies.
- Help schools link students with food allergies and their families to community health services and family support services when needed.

## **3. Prepare for food allergy emergencies.**

- Develop protocols for responding to food allergy emergencies that can guide practices at the building level.
- If allowed by state laws, including regulations, and district policy, obtain or write nonpatient-specific prescriptions and standing orders for epinephrine auto-injectors that can be used to respond to anaphylaxis emergencies.
- Work directly with local emergency responders to confirm that they carry epinephrine auto-injectors for anaphylaxis emergencies.
- Review school emergency response plans to make sure they include the actions needed to respond to food allergy emergencies.
- Help schools conduct periodic emergency response drills and practice how to handle food allergy emergencies.
- Help schools conduct debriefing meetings after a food allergy reaction or emergency.

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e. Regardless of what forms schools use, school districts must comply with Federal requirements to locate, identify, and evaluate children who may have disabilities because of a food allergy and may be eligible for services under Federal law. Under Section 504 of the Rehabilitation Act of 1973, these requirements are found in 34 C.F.R. §§104.32 and 104.35. See also 34 C.F.R. §300.111 and §§300.301 through 300.311 of the Individuals with Disabilities Education Act regulations.

- Review data and information (e.g., when and where medication was administered) from incident reports of food allergy reactions and assess the effect of the incident on all students involved. Provide input to modify policies and practices as needed.
- Collect school data to monitor and track food allergy emergencies across the district. Use these data to guide improvements in policies and practices.

#### ***4. Support professional development on food allergies for staff.***

- Seek professional development opportunities to learn updated information about managing food allergies.
- Educate district and school staff about food allergies so they are adequately trained, competent, and confident to perform assigned responsibilities to help students with food allergies and respond to an emergency.
- Coordinate district training for school nurses and others who might lead school teams responsible for implementing FAMPPs to make sure they have the information they need to develop effective plans.
- Know and educate others about federal and state laws, including regulations, and policies relevant to the obligations of schools to students with food allergies and make sure district policies and practices follow these laws and policies.
- Help school building leaders plan and provide food allergy training for staff, parents, and students.
- Help train delegated staff members on how to store, access, and administer epinephrine auto-injectors.

#### ***5. Educate students and family members about food allergies.***

- Work collaboratively with the curriculum coordinator or health education coordinator at the district level to identify appropriate food allergy content for the district's health education curriculum.
- Help school administrators communicate the district's policies and practices for managing food allergies to parents through newsletters, announcements, and other methods.

#### ***6. Create and maintain a healthy and safe school environment.***

- Work collaboratively with district staff to enforce policies that promote healthy physical environments.
- Work collaboratively with student support services staff at the district level to enforce policies that prohibit discrimination and bullying against all students, including those with food allergies.

## Student Support Services Director

The student support services director can be a school psychologist, school counselor, or child and family services director.

### ***1. Participate in the school's coordinated approach to managing food allergies.***

- Help develop a school district's comprehensive approach to managing food allergies that will support the FAMPP used in each school.
- Promote, disseminate, and communicate food allergy policies to all school staff, families, and the community.
- Know and inform others about federal and state laws, including regulations, and policies relevant to the obligations of schools to students with food allergies and make sure district policies and practices follow these laws and policies.
- Provide direct assistance to help schools establish procedures and plans for monitoring students with food allergies, including, if appropriate, through Section 504 plans or IEPs.
- Coordinate with other district staff, including the food service director, curriculum coordinator, and health services director.
- On a regular schedule, review and evaluate the school district's food allergy policies and practices and revise as needed.

### ***2. Ensure the daily management of food allergies for individual students.***

- Help the school team responsible for implementing the FAMPP write this plan. If a student is eligible to receive services under Section 504 or, if appropriate, IDEA, make sure all provisions of these federal laws are met.
- Help schools link students with food allergies and their families to community health services and family support services when needed.

### ***3. Prepare for food allergy emergencies.***

- Help develop protocols for responding to food allergy emergencies that can guide practices in district schools.
- Review school emergency response plans to make sure they include the actions needed to respond to food allergy emergencies.
- Help schools conduct periodic emergency response drills and practice how to handle a food allergy emergency.
- Review data and information (e.g., when and where medication was administered) from incident reports of food allergy reactions and assess the effect of the incident on affected students. Provide input to modify policies and practices as needed.

#### ***4. Support professional development on food allergies for staff.***

- Help educate district and school staff about food allergies so they are adequately trained, competent, and confident to perform assigned responsibilities to help students with food allergies and respond to an emergency.
- Help develop district training for all school staff to help them improve their FAMPPs.
- Know and educate others about federal and state laws, including regulations, and policies relevant to the obligations of schools to students with food allergies and make sure district and school policies and practices follow these laws and policies.
- Help school building leaders plan and provide food allergy training for staff, parents, and students.

#### ***5. Educate students and family members about food allergies.***

- Help school administrators communicate the district's policies and practices for preventing food allergy reactions to parents through newsletters, announcements, and other methods.

#### ***6. Create and maintain a healthy and safe school environment.***

- Work collaboratively with district staff to enforce policies that promote healthy physical environments.
- Work collaboratively with district health services staff, school principals, school counselors, and others to help enforce policies that prohibit discrimination and bullying against all students, including those with food allergies.

### **District Food Service Director**

#### ***1. Participate in the school's coordinated approach to managing food allergies.***

- Help develop a school district's comprehensive approach to managing food allergies that will support the FAMPP used in each school.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Access and use resources and guidance from local health departments and the state agency that administers child nutrition programs.
- Promote, disseminate, and communicate the food allergy policies to school staff, families, and the community.
- Know and educate others about federal and state laws, including regulations, and policies on food allergies and the need to follow these laws and policies, including those regulations that pertain to the U.S. Department of Agriculture's (USDA's) Child Nutrition Program.

- Ensure that food service staff understand USDA's required doctor's statement as written and that the statement provides sufficient information to provide a safe meal.
- Help establish school-level procedures and plans for monitoring students with food allergies, including plans for accommodating the special nutritional needs of individual students when necessary.
- Coordinate with other district staff, including the student support services director, curriculum coordinator, and health services director.
- On a regular schedule, review and evaluate the school district's food allergy policies and practices and revise as needed.

## ***2. Ensure the daily management of food allergies for individual students.***

- Develop and implement procedures in each school for identifying students with food allergies in school cafeterias. Make sure that procedures governing access to personally identifiable information from education records are consistent with student rights under the Family Educational Rights and Privacy Act of 1974 (FERPA) and any other federal and state laws that protect the privacy or confidentiality of student information. (See Section 5 for more information about FERPA.)
- Work with the health services director, principals and other school staff responsible for implementing FAMPPs to set up procedures for handling food allergies in the cafeteria. These plans should be consistent with the student's IHP, Section 504 plan, or, if appropriate, IEP, and USDA regulations on meals and food substitutions, as reflected in the USDA's Accommodating Children with Special Dietary Needs in the School Nutrition Programs. Procedures should be established for children who participate in school meals programs and those who bring food from home.
- Work with school teams responsible for developing ECPs for students with food allergies. For schools that participate in the USDA's Child Nutrition programs, make sure that documents that list appropriate food substitutions for a student with a food allergy disability are signed by a licensed doctor. The doctor's statement must identify:
  - The child's food allergy.
  - An explanation of why the allergy restricts the child's diet.
  - The major life activity affected by the allergy.
  - The food or foods to be omitted from the child's diet and the foods or choices that can be substituted.
- Establish procedures for obtaining information to clarify food substitutions and other relevant medical information from a student's doctor as needed.
- Coordinate food substitutions for all schools with students who have food allergies, in consultation as necessary with each child's doctor, and manage the documentation of these activities. When possible, use foods that are already served in school meals or snacks to make appropriate substitutions.



- Provide oversight and tracking of each student’s dietary plans, including tracking allergic reactions that occur during school meals.
- Develop and implement policies and procedures to prevent allergic reactions and cross-contact during meal preparation and service. Communicate these policies and procedures to school food service staff.
- Keep information about ingredients for all foods bought and served by school food service programs and keep labels of foods given to food-allergic children for at least 24 hours so that the labels can be reviewed if needed.
- Be prepared to share information about ingredients in recipes and foods served by food service programs with parents.

### ***3. Prepare for food allergy emergencies.***

- Help develop protocols for responding to food allergy emergencies that can guide practices in district schools.
- Help the health services director communicate the appropriate ways to avoid exposure to food allergens and respond to food allergy emergencies to all staff members who are involved in managing a student’s food allergy in the cafeteria.
- Make sure that food service staff are able to respond to a food allergy emergency in the cafeteria and implement an ECP.
- Review school emergency response plans to make sure they include the actions needed to respond to food allergy emergencies during school meals.
- Help schools conduct periodic emergency response drills and practice how to handle a food allergy emergency.
- Review data and information (e.g., when and where medication was administered) from incident reports on any food allergy reactions and assess the effect of the incident on affected students. Provide input to modify policies and practices as needed.

### ***4. Support professional development on food allergies for staff.***

- Help educate district and school staff about food allergies so they are adequately trained, competent, and confident to perform assigned responsibilities to help students with food allergies and respond to an emergency.
- Provide training opportunities for school food service staff to help them understand how to follow policies and procedures for preparing and serving safe meals and snacks for students with food allergies.
- Make sure that school food service staff participate in district training on food allergies.
- Make sure that all school staff understand their role in preventing and responding to emergencies in the school cafeteria.
- Help school building leaders plan and provide food allergy training for staff, parents, and students.

## ***5. Educate students and family members about food allergies.***

- Help the curriculum coordinator or health education coordinator integrate food allergy lessons, such as how to read food labels, into the district's health education curriculum.
- Communicate with parents about any foods that might be served as part of school meals programs such as the School Breakfast Program or the Fresh Fruit and Vegetable Program.
- Share information about options for food substitutions with the parents of students with food allergies. Schools are encouraged to make substitutions with foods that have already been bought, when possible.
- Work with administrators, classroom teachers, and parent-teacher organizations to offer food allergy education to parents in schools.
- Help school administrators communicate the policies and procedures used in food service programs to prevent food allergy reactions to parents through newsletters, announcements, and other methods.

## ***6. Create and maintain a healthy and safe school environment.***

- Work collaboratively with district staff to help enforce policies that promote healthy physical environments.
- Work collaboratively with district health services staff, school principals, school food service staff, and others to help enforce policies that prohibit discrimination and bullying against students with food allergies.
- Provide guidance to school food service staff that helps them to meet the dietary needs of students with food allergies and protect their health during school meals, while guarding against practices that could result in alienation of or discrimination against these students.

See Section 6 for more resources and tools that might assist in managing food allergies and allergy-related emergencies in schools.

## Section 3.

# Putting Guidelines into Practice: Actions for School Administrators and Staff

Effective management of food allergies in schools requires the participation of many people. This section presents the actions that school building administrators and staff can take to implement the recommendations in Section 1. Some actions duplicate responsibilities required under applicable federal and state laws, including regulations, and policies. Although many of the actions presented here are not required by statute, they can contribute to better management of food allergies in schools.

Some actions are intentionally repeated for different staff positions to ensure that critical actions are addressed even if a particular position does not exist in the district or school (e.g., school doctor). This duplication also reinforces the need for different staff members to work together to manage food allergies effectively. All actions are important, but some will have a greater effect than others.

Some actions may be most appropriately carried out by district-level staff members whose roles are to support food allergy management plans and practices across schools or to provide specific services to schools that do not have an on-site staff person to provide these services. Ultimately, each school district or school must determine which actions are most practical and necessary to implement and who should be responsible for those actions.

## School Administrator

The school administrator can be a principal or assistant principal.

### ***1. Lead the school's coordinated approach to managing food allergies.***

- Coordinate planning and implementation of a comprehensive Food Allergy Management and Prevention Plan (FAMPP) for your school. If your school has an on-site registered nurse, work with this person and the members of any relevant team—such as the school wellness team, school health team, or school improvement team—to plan and implement the FAMPP. Designate a qualified person (e.g., the registered nurse) to lead development of the FAMPP and designate responsibilities for implementing the plan as appropriate. If your school does not have an on-site nurse, ask for help from a registered nurse at the district level or from a public health nurse in the community.
- Make sure staff understand the school's responsibilities under Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act (ADA), the Individuals with Disabilities Education Act (IDEA), and the Richard B. Russell National School Lunch Act to students who are or may be eligible for services under those laws. Make sure they understand the need to comply with the Family Educational Rights and Privacy Act of 1974 (FERPA) and any other federal and state laws that protect the privacy of student information. (See Section 5 for information about applicable federal laws.)
- Communicate school district policies and the school's practices for managing food allergies to all school staff, substitute teachers, classroom volunteers, and families.
- Make sure staff implement school district policies for managing food allergies.

- Help staff implement the school's FAMPP.
- On a regular basis, review and evaluate your school's FAMPP and revise as needed.

## **2. Ensure the daily management of food allergies for individual students.**

- Make sure that mechanisms—such as health forms, registration forms, and parent interviews—are in place to identify students with food allergies.
- If your school does not have an on-site registered nurse, work with the parents of children with food allergies and their doctor to develop a written Emergency Care Plan (ECP) (sometimes called a Food Allergy Action Plan). This plan is needed to manage and monitor students with food allergies on a daily basis, whether they are at school or at school-sponsored events. If a student has been determined to be eligible for services under Section 504 or, if appropriate, IDEA, make sure that all provisions of these federal laws are met.
- Share information about students with food allergies with all staff members who need to know, provided the exchange of information occurs in accordance with FERPA and any other federal and state laws that protect the confidentiality or privacy of student information. (See section 5 for more information about FERPA.) Make sure these staff members are aware of what actions are needed to manage each student's food allergy on a daily basis.

## **3. Prepare for and respond to food allergy emergencies.**

- Make sure that responding to life-threatening food allergy reactions is part of the school's "all-hazards" approach to emergency planning.
- Make sure that parents of students with food allergies provide epinephrine auto-injectors to use in food allergy emergencies, if their use is called for in a student's ECP.
- Set up communication systems that are easy to use for staff who need to respond to food allergy reactions and emergencies.
- Make sure that staff who are delegated and trained to administer epinephrine auto-injectors can get to them quickly and easily.
- Make sure that local emergency responders know that epinephrine may be needed when they are called to respond to a school emergency.
- Prepare for food allergy reactions in students without a prior history of food allergies or anaphylaxis.
- Make sure that staff plan for the needs of students with food allergies during class field trips and during other extracurricular activities.
- Conduct periodic emergency response drills and practice how to handle a food allergy emergency.
- Contact parents immediately after any suspected allergic reaction and after a child with a food allergy ingests or has contact with a food that may contain an allergen, even if an allergic reaction does not occur. If the child may need treatment, recommend that the parents notify the child's primary health care provider or allergist.

- Document all responses to food allergy emergencies. Review data and information (e.g., when and where medication was used) from incident reports of food allergy emergencies and assess the effect on affected students. Provide input to modify your school district’s emergency response policies and practices as needed.

#### ***4. Support professional development on food allergies for staff.***

- Make sure staff receive professional development and training on food allergies.
- Coordinate training with licensed health care professionals, such as school or district doctors or nurses or local health department staff, and with other essential school or district professionals, such as the district’s food service director, if appropriate. Invite parents of students with food allergies to help develop the content for this training.

#### ***5. Educate students and family members about food allergies.***

- Make sure that the school’s curricular offerings include information about food allergies to raise awareness among students.
- Communicate the school’s responsibilities, expectations, and practices for managing food allergies to all parents through newsletters, announcements, and other methods.

#### ***6. Create and maintain a healthy and safe school environment.***

- Increase awareness of food allergies throughout the school environment.
- Emphasize and support practices that protect and promote the health of students with food allergies across the school environment, during before- and after-school activities, and during transportation of students.
- Make sure that students with food allergies have an equal opportunity to participate in all school activities and events.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Reinforce the school’s rules that prohibit discrimination and bullying as they relate to students with food allergies.

## **Registered School Nurses**

### ***1. Participate in the school’s coordinated approach to managing food allergies.***

- Take the lead in planning and implementing the school’s FAMPP or help the school administrator with this task.
- Support partnerships among school staff and the parents and doctors (e.g., pediatricians or allergists) of students with food allergies.
- Consult state and local Nurse Practice Acts and guidelines to guide the roles and responsibilities of school nurses.

## ***2. Supervise the daily management of food allergies for individual students.***

- Make sure that students with food allergies are identified. Share information with other staff members as needed, provided the exchange of information occurs in accordance with FERPA and any other federal and state laws that protect the confidentiality or privacy of student information.
- Obtain or develop an ECP for each student with a food allergy or food allergy disability. Get the medical information needed to care for children with food allergies when they are at school, such as medical records and emergency information. Communicate with parents and health care providers (with parental consent) about known food allergies, signs of allergic reactions, relevant use of medications, complicating conditions, and other relevant health information.
- Make sure that USDA's required doctor's statement is completed and provides clear information to assist in the preparation of a safe meal accommodation. This statement can be part of an ECP or a separate document.
- Use a team approach to develop an Individualized Healthcare Plan (IHP) for each student with a food allergy, and, if required by Federal law, a Section 504 plan, or an Individualized Education Program (IEP), if appropriate.
- Monitor each student's ECP or other relevant plan on a regular basis and modify plans when needed.
- Refer parents of children who do not have access to health care to services in the community.
- For students who have permission to carry and use their own epinephrine auto-injectors, regularly assess their ability to perform these tasks.

## ***3. Prepare for and respond to food allergy emergencies.***

- Develop instructions for responding to an emergency if a school nurse is not immediately available. Add these instructions to the school's FAMPP.
- File ECPs in a place where staff can get to them easily in an emergency. Distribute ECPs to staff on a need-to-know basis.
- Make sure that the administration of an epinephrine auto-injector follows school policies and state mandates. Make sure that medications are kept in a secure place that staff can get to quickly and easily. Keep back-up epinephrine auto-injectors for students who carry their own. Regularly inspect the expiration date on all stored epinephrine auto-injectors.
- Train and supervise delegated staff members how to administer an epinephrine auto-injector and recognize the signs and symptoms of food allergy reactions and anaphylaxis.
- If allowed by state and local laws, work with school leaders to get extra epinephrine auto-injectors or nonpatient-specific prescriptions or standing orders for auto-injectors to keep at school for use by staff delegated and trained to administer epinephrine in an anaphylaxis emergency.
- Assess whether students can reliably carry and use their own epinephrine auto-injectors and encourage self-directed care when appropriate.

- Make sure that school emergency plans include procedures for responding to any student who experiences signs of anaphylaxis, whether the student has been identified as having a food allergy or not.
- Make sure that staff plan for the needs of students with food allergies during class field trips and during other extracurricular activities.
- Contact parents immediately after any suspected allergic reaction and after a child with a food allergy ingests or has contact with a food that may contain an allergen, even if an allergic reaction does not occur. If the child may need treatment, recommend that the parents notify the child's primary health care provider or allergist.
- After each food allergy emergency, review how it was handled with the school administrator, school doctor or nurse (if applicable), parents, staff members involved in the response, emergency medical services (EMS) responders, and the student to identify ways to prevent future emergencies and improve emergency response.
- Help students with food allergies transition back to school after an emergency.
- Talk with students who may have witnessed a life-threatening allergic reaction in a way that does not violate the privacy rights of the student with the food allergy.

#### ***4. Help provide professional development on food allergies for staff.***

- Stay up-to-date on best practices for managing food allergies. Sources for this information include allergists or other doctors who are treating students with food allergies, local health department staff, national school nursing resources, and the district's food service director or registered dietitian.
- Educate teachers and other school staff about food allergies and the needs of specific students with food allergies in a manner consistent with FERPA, USDA, and any other federal and state laws that protect the privacy or confidentiality of student information. (See Section 5 for more information about FERPA.)
- Advise staff to refer students to the school nurse when food allergy symptoms or side effects interfere with school activities so that medical and educational services can be properly coordinated.

#### ***5. Provide food allergy education to students and parents.***

- Teach students with food allergies about food allergies and help them develop self-management skills.
- Make sure that students who are able to manage their own food allergies know how to recognize the signs and symptoms of their own allergic reactions, are capable of using an epinephrine auto-injector, and know how to notify an adult who can respond to a food allergy reaction.
- Help classroom teachers add food allergy lessons to their health and education curricula.
- Find ways for the parents of students with food allergies to share their knowledge and experience with other parents.
- Work with administrators, classroom teachers, and parent-teacher organizations to offer food allergy education for parents at school.
- Help the school administrator communicate the school's policies and practices for preventing food allergy reactions to parents through newsletters, announcements, and other methods.

## **6. Create and maintain a healthy and safe school environment.**

- Work with other school staff and parents to create a safe environment for students with food allergies. On a regular basis, assess the school environment, including the cafeteria and classrooms, to identify allergens in the environment that could lead to allergic reactions. Work with appropriate staff to develop strategies to help children avoid identified allergens.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Work with school counselors and other school staff to provide emotional support to students with food allergies.
- Promote an environment that encourages students with food allergies to tell a staff member if they are bullied because of their allergy.

## **School Doctors**

A school doctor works full-time or part-time to provide consultation and a wide range of health services to the school population.

### **1. Participate in the school's coordinated approach to managing food allergies.**

- Lead or help plan and implement the school's FAMPP.
- Support partnerships among school staff and the parents and doctors (e.g., allergists, pediatricians) of students with food allergies.
- Keep current on federal, state, and local guidance on food allergy management.
- Consult state and local Nurse Practice Acts to make sure the roles and responsibilities of school nurses are appropriate.
- Guide and support the food allergy management practices of school nursing staff.
- Help evaluate school FAMPPs.

### **2. Ensure the daily management of food allergies for individual students.**

- Help the school nurse perform the actions necessary to manage students with food allergies on a daily basis. (See the items under Action 2 for Registered School Nurses.)



### ***3. Prepare for and respond to food allergy emergencies.***

- Help the school nurse make sure that all students with food allergies have an ECP.
- If allowed by state and local laws, write prescriptions or standing orders for nonpatient-specific epinephrine auto-injectors so the school can stock back-up medication for use in food allergy emergencies.
- Help the school nurse assess whether students can reliably carry and use their own epinephrine auto-injector and encourage self-directed care when appropriate.
- Help the school nurse train staff how to use epinephrine auto-injectors and recognize the signs and symptoms of food allergy reactions and anaphylaxis.
- Help the school nurse and health assistants regularly inspect the expiration date on all stored epinephrine auto-injectors.
- Make sure that school emergency plans include procedures for responding to any student who experiences signs of anaphylaxis, whether diagnosed with a food allergy or not.
- Make sure that staff plan for the needs of students with food allergies during class field trips and during other extracurricular activities.
- Contact parents immediately after any suspected allergic reaction and after a child with a food allergy ingests or has contact with a food that may contain an allergen, even if an allergic reaction does not occur. If the child may need treatment, recommend that the parents notify the child's primary health care provider or allergist.
- After each food allergy emergency, review how it was handled with the school administrator, school nurse, parents, staff members involved in the response, EMS responders, and the student to identify ways to prevent future emergencies and improve emergency response.

### ***4. Help provide professional development on food allergies for staff.***

- Share current and relevant knowledge of best practices for managing food allergies with school leaders (e.g., school administrator, school nurse).
- Help educate teachers and other school staff about food allergies and the needs of specific students with food allergies, in a manner consistent with FERPA, USDA, and any other federal and state laws that protect the privacy or confidentiality of student information. (See Section 5 for more information about FERPA.)
- Advise staff to refer students to the school doctor or nurse when symptoms or side effects of a food allergy interfere with school activities so that medical and educational services can be coordinated.

### ***5. Provide food allergy education to students and parents.***

- Help teach students with food allergies about food allergies and help them develop self-management skills.

- Help the school nurse make sure that students who are able to manage their food allergies know how to recognize the signs and symptoms of their own allergic reactions, are capable of using an epinephrine auto-injector, and know how to notify an adult who can respond to a food allergy reaction.
- Help classroom teachers add food allergy lessons to their health and education curricula.
- Help find ways for parents of students with food allergies to share their knowledge and experience with other parents.
- Work with administrators, the school nurse, classroom teachers, and parent-teacher organizations to offer food allergy education for parents at school.
- Help the school administrator communicate the school's policies and practices for preventing food allergy reactions to parents through newsletters, announcements, and other methods.

## **6. Create and maintain a healthy and safe school environment.**

- Work with other school staff and parents to create a safe environment for students with food allergies.
- On a regular basis, assess the school environment, including the cafeteria and classrooms, to identify allergens in the environment that could lead to allergic reactions. Work with appropriate staff to manage identified allergens.
- Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Work with school counselors, the school nurse, and other school staff to provide emotional support to students with food allergies.
- Promote an environment that encourages students with food allergies to tell a staff member if they are bullied or harassed because of their allergy.

## **Health Assistants, Health Aides, or Other Unlicensed Personnel**

These staff members work with the school or district nurse or doctor.

### **1. Help with the daily management of food allergies for individual students.**

- Help the school nurse identify students with food allergies. Review the medical records and emergency information of all students.
- Talk with the school nurse about any allergic reactions and changes in a student's health status.

## ***2. Prepare for and respond to food allergy emergencies.***

- Get a copy of the ECP for every student with food allergies. Make sure the plan includes information about signs and symptoms of an allergic reaction, how to respond, and whether medications should be given.
- File ECPs in a place where staff can get to them easily in an emergency.
- Be ready to respond to a food allergy emergency if a nurse is not immediately available. If school policies and state mandates allow you to give medication and you are delegated to perform this task, complete training on how to administer epinephrine, regularly review instructions, and practice this task. Make sure that medications are kept in a secure place that you or other delegated staff members can get to quickly and easily. Regularly inspect the expiration date on all stored epinephrine auto-injectors.
- After each food allergy emergency, participate in a review of how it was handled with the school administrator, school doctor (if applicable), school nurse, parents, staff members involved in the response, EMS responders, and the student to identify ways to prevent future emergencies and improve emergency response.

## ***3. Participate in professional development on food allergies.***

- Complete training to help you recognize and understand the following:
  - Signs and symptoms of allergic reactions and how they are communicated by students.
  - How to read food labels and identify allergens.
  - How to use an epinephrine auto-injector (if delegated and trained to do so).
  - How to deal with emergencies in the school in ways that are consistent with a student's ECP.
  - Your role in implementing a student's ECP.
  - When and how to call EMS and parents.
  - How FERPA, USDA, and other federal and state laws that protect the privacy and confidentiality of student information apply to students with food allergies and food allergy disabilities.
  - General strategies for reducing or preventing exposure to food allergens in the classroom, such as cleaning surfaces, using nonfood items for celebrations, and getting rid of nonfood items that contain food allergens (e.g., clay, paste).
  - Policies on bullying and discrimination against all students, including those with food allergies.

## ***4. Provide food allergy education to students and parents.***

- Get help from the school counselor or other mental health professionals to teach students about bullying of and discrimination against students with food allergies.
- Help communicate policies on bullying and discrimination to parents.

## **5. Create and maintain a healthy and safe school environment.**

- Work with other school staff and parents to create a safe environment for students with food allergies.
- Promote an environment that encourages support for students with food allergies and promotes positive interactions between students.
- Report all cases of bullying against students, including those with food allergies, to the school administrator, school nurse, or school counselor.

## **Classroom Teachers**

This category includes classroom teachers in all basic subjects, as well as physical education teachers, instructional specialists such as music or art teachers, paraeducators, student teachers, long-term substitute teachers, classroom aides, and classroom volunteers.

### **1. Participate in the school's coordinated approach to managing food allergies.**

- Ask the school nurse or school administrator for information on current policies and practices for managing students with food allergies, including how to manage medications and respond to a food allergy reaction.
- Help plan and implement the school's FAMPP.

### **2. Help with the daily management of food allergies for individual students.**

- Make sure you understand the essential actions that you need to take to help manage food allergies when students with food allergies are under your supervision, including when meals or snacks are served in the classroom, on field trips, or during extracurricular activities. Seek guidance and help from the school administrator, school nurse, or school food service director as needed.
- Be available and willing to help students who manage their own food allergies.
- Work with parents and the school nurse and other appropriate school personnel to determine if any classroom modifications are needed to make sure that students with food allergies can participate fully in class activities.
- With parental consent, share information and responsibilities with substitute teachers and other adults who regularly help in the classroom (e.g., paraeducators, volunteers, instructional specialists). (Depending on a school district's FERPA notice as to which individuals would constitute school officials with legitimate educational interests, FERPA may not require parental consent in these circumstances. FERPA also includes an emergency exception to the prior consent requirement if there is an articulable and significant threat to the health or safety of the student or others. See Section 5 for more information about FERPA.)
- Refer students with undiagnosed but suspected food allergies to the school nurse for follow-up.<sup>f</sup>

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f. See footnote e. infra.

- If your school does not have a nurse on-site, talk with parents about the signs and symptoms you have seen and recommend that they discuss them with their primary health care provider.
- If you suspect a severe food allergy reaction or anaphylaxis, take immediate action, consistent with your school's FAMPP or "all-hazards" emergency response protocol.

### ***3. Prepare for and respond to food allergy emergencies.***

- Read and regularly review each student's ECP. Never hesitate to activate the plan in an emergency. If you are delegated and trained according to state laws, including regulations, be ready to use an epinephrine auto-injector.
- Keep copies of ECPs for your students in a secure place that you can get to easily in an emergency. With parental consent, share information from the ECP with substitute teachers and other adults who regularly help in the classroom to help them know how to respond to a food allergy emergency. (Depending on a school district's FERPA notice as to which individuals would constitute school officials with legitimate educational interests, FERPA may not require parental consent in these circumstances. FERPA also includes an emergency exception to the prior consent requirement if there is an articulable and significant threat to the health or safety of the student or others. See Section 5 for more information about FERPA.)
- Support and help students who have permission to carry and use their own epinephrine in cases of an allergic reaction.
- Make sure that the needs of students with food allergies are met during class field trips and during other extracurricular activities.
- Immediately contact the school administrator and if available, the school nurse after any suspected allergic reaction.
- After each food allergy emergency, review how it was handled with the school administrator, school nurse, parents, other staff members involved in the response, EMS responders, and the student to identify ways to prevent future emergencies and improve emergency response.
- Help students with food allergies transition back to school after an emergency.
- Address concerns with students who witness a life-threatening allergic reaction in a way that does not compromise the confidentiality rights of the student with the allergy.

### ***4. Participate in professional development on food allergies.***

- Complete training to help you recognize and understand the following:
  - Signs and symptoms of food allergies and how they are manifested in and communicated by students.
  - How to read food labels and identify allergens.
  - How to use an epinephrine auto-injector (if delegated and trained to do so).
  - How to respond to food allergy emergencies in ways that are consistent with a student's ECP, if appropriate, a Section 504 Plan, or IEP, if appropriate.

- When and how to call EMS and parents.
- Your role in implementing a student’s ECP.
- FERPA, USDA, and other federal and state laws that protect the privacy or confidentiality of student information, and other legal rights of students with food allergies. (See Section 5 for more information about federal laws.)
- General strategies for reducing or preventing exposure to food allergens in the classroom, such as cleaning surfaces, using nonfood items for celebrations, getting rid of nonfood materials that contain food allergens (e.g., clay, paste), and preventing cross contact of allergens when meals or snacks are served in the classroom.
- Policies that prohibit discrimination and bullying against all students, including those with food allergies.

## ***5. Provide food allergy education to students and parents.***

- Look for ways to add information about food allergies to your curriculum. Work with other teachers to plan lessons and activities to teach students how they can prevent allergic reactions.
- Work with the school nurse to educate parents about the presence and needs of students with food allergies in the classroom. Raise awareness and educate the parents of children without food allergies about “food rules” for the classroom. Ask parents to help you keep certain foods out of the classroom during meals, celebrations, and other activities that might include food.
- Ask the school counselor or other mental health professionals for help or resources to teach students about policies that prohibit discrimination and bullying against all students, including those with food allergies.
- Communicate policies on bullying and discrimination to all parents.

## ***6. Create and maintain a healthy and safe school environment.***

- Promote a safe physical environment through the following actions:
  - Create classroom rules and practices for dealing with food allergies. Tell parents about these rules and practices at the beginning of the school year or when you find out that a student with a food allergy will be in your class.
  - Create ways for students with food allergies to participate in all class activities.
  - Avoid using known allergens in classroom activities, such as arts and crafts, counting, science projects, parties, holidays and celebrations, or cooking.
  - Enforce hand washing before and after eating, particularly for younger students.
  - Use nonfood items for rewards or incentives.
  - Encourage the use of allergen-safe foods or nonfood items for birthday parties or other celebrations in the classroom. Support parents of students with food allergies who wish to send allergen-safe snacks for their children.

- Discourage trading or sharing of food with a student with a food allergy in the classroom, particularly for younger students.
- Enforce food allergy prevention practices while supervising students in the cafeteria.
- Manage food allergies on field trips through the following actions:
  - Determine if the intended location is safe for students with food allergies. If it is not safe, the field trip might have to be changed or cancelled if accommodations cannot be made. Students cannot be excluded from field trips because of food allergies.
  - Invite the parents of students with food allergies to chaperone or go with their child on the field trip. Many parents may want to go, but they cannot be required to go.
  - Work with school food service staff to plan meals and snacks.
  - Make sure you include someone who is delegated and trained to administer epinephrine, that you have quick access to an epinephrine auto-injector, and that you know where the nearest medical facilities are located. If a food allergy emergency occurs, activate the student's ECP and notify the parents.
  - Make sure there are appropriate emergency protocols and mechanisms in place to respond to a food allergy emergency when away from the school.
  - Make sure that communication devices are working so you can respond quickly during an emergency.
- Promote a positive psychosocial climate through the following actions:
  - Be a role model by respecting the needs of students with food allergies.
  - Help students make decisions about and manage their own food allergies.
  - Encourage supportive and positive interactions between students.
  - Reinforce the school's rules against discrimination and bullying.
  - Take action to address all reports of bullying or harassment of a student with a food allergy.
  - Tell parents if their child has been bullied, and report all cases of bullying to the school administrator.
  - Tell parents and the school nurse if you see negative changes in a student's academic performance or behavior.

## School Food Service Managers and Staff

### **1. Participate in the school's coordinated approach to managing food allergies.**

- Use resources and guidance from the district food service director, local board of health, USDA, and dietitians to reduce exposure to food allergens.
- Help plan and implement the school's FAMPP. Make sure that it includes specific practices for managing food allergens in school meals served inside and outside of the cafeteria.

### **2. Help with the daily management of food allergies for individual students.**

- Identify students with food allergies in a way that does not compromise students' privacy or confidentiality rights.
- Make sure you have and understand dietary orders, or the doctor's statement, and other relevant medical information that you need to make meal accommodations for students with food allergies and food allergy disabilities.
- Consult with the district foodservice director to help develop individual dietary and cafeteria management plans for each student with a food allergy and food allergy disability. These plans should be consistent with the student's IHP, and if the student has a food allergy, the student's Section 504 plan, or, if appropriate, IEP, and USDA regulations on meals and food substitutions, as reflected in the USDA's *Accommodating Children with Special Dietary Needs in the School Nutrition Programs*.
- Help communicate appropriate actions to avoid allergic reactions and respond to food allergy emergencies to all staff members and food service staff who are expected to help manage a student's food allergy in the cafeteria.
- Follow policies and procedures to prevent allergic reactions and cross-contact of potential food allergens during food preparation and service.
- Understand how to read labels to identify allergens in foods and beverages served in school meals. Work with the school foodservice director, the district food service director, or the food manufacturer if additional information or clarification is needed on the product's ingredients.
- Manage food substitutions for students with food allergies and food allergy disabilities and manage the documentation of these activities. Work with the school administrator or school nurse and the district food service director to make sure that the information needed to meet USDA and state regulations for food service is documented as required.
- Be prepared to share information about ingredients in recipes and foods served by the school food service program with parents.

### **3. Prepare for and respond to food allergy emergencies.**

- Be familiar with student's ECPs and the doctor's statement required by USDA, what actions must be taken if a food allergy emergency occurs in the cafeteria. Make sure that food service staff are able to respond to a food allergy emergency in the cafeteria and implement an ECP.



- If you are delegated and trained according to state laws, including regulations, be ready to use an epinephrine auto-injector.
- If appropriate and allowed by state laws, including regulations, school policy, and the school's FAMPP, keep an epinephrine auto-injector in a secure place in the cafeteria that you can get to quickly and easily.
- Provide support and help to students who carry and use their own medication.
- After each food allergy emergency, participate in a review of how it was handled with the school administrator, school doctor (if applicable), school nurse, parents, staff members involved in the response, EMS responders, and the student to identify ways to prevent future emergencies and improve emergency response.

#### ***4. Participate in professional development on food allergies.***

- Complete training to help you recognize and understand the following:
  - Signs and symptoms of food allergies and how they are communicated by student.
  - How to read food labels and identify allergens.
  - How to plan meals for students with food allergies and allergy disabilities and how to prevent cross-contact of allergens. Consult with the district school food service director when necessary.
  - How to deal with emergencies in the school in ways that are consistent with a student's ECP.
  - The role of the food service manager and staff in implementing a child's doctor statement under USDA requirements and ECP, if applicable.
  - How to use an epinephrine auto-injector (if delegated and trained to do so).
  - FERPA, USDA, and other federal and state laws that protect the privacy or confidentiality of student information and other legal rights of students with food allergies. (See Section 5 for more information about federal laws.)
  - General strategies for reducing or preventing allergic reactions in the cafeteria.
  - Policies on bullying and discrimination against all students, including those with food allergies.

#### ***5. Provide food allergy education to students and parents.***

- Help classroom teachers add food allergy lessons into their health and education curriculum, including teaching students how to read food labels.
- Share menu ideas with parents of students with food allergies to identify potential allergens and improve healthy eating.
- Find ways for parents of students with food allergies to share their knowledge and experience with other parents.
- Help the school administrator communicate the policies and practices used by the food service staff to prevent food allergy reactions to parents through newsletters, announcements, and other methods.

## **6. Create and maintain a healthy and safe school environment.**

- Reduce the potential for allergic reactions through the following actions:
  - Be able to recognize students with food allergies and food allergy disabilities in the cafeteria.
  - Follow procedures for handling food allergies in the cafeteria, even if a student is not participating in the Child Nutrition Program school meals program.
  - Read food labels to identify allergens.
  - Follow policies and procedures to prevent cross-contact of potential food allergens during food preparation and service.
  - Make sure that food allergy policies and practices address competitive foods, such as those available in vending machines, in school stores, fundraisers, during class parties, at athletic events, and during after-school programs.
- Promote a positive psychosocial climate in the cafeteria through the following actions:
  - Encourage supportive and positive interactions between students.
  - Reinforce the school's rules against bullying and discrimination.
  - Take action to address all reports of bullying or harassment of a student with a food allergy.
  - Report all cases of bullying and harassment against students, including those with food allergies, to the school administrator, school nurse, or school counselor.

## **School Counselors and Other Mental Health Services Staff**

This category includes school psychologists and school social workers.

### **1. Participate in the school's coordinated approach to managing food allergies.**

- Help plan and implement the school's FAMPP.

### **2. Help with the daily management of food allergies for individual students.**

- Address immediate and long-term mental health problems, such as anxiety, depression, low self-esteem, negative behavior, or eating disorders, among students with food allergies.
- Address adolescent oppositional behavior, such as noncompliance with IHPs.
- Make referrals to mental health services and professionals outside the school for students who need them, consistent with applicable requirements of Section 504 and IDEA, if appropriate.
- Work with school health service staff (e.g., school doctor, school nurse) to develop consistent protocols for referrals.

### ***3. Prepare for and respond to food allergy emergencies.***

- Read and regularly review each student's ECP. Never hesitate to activate the plan in an emergency. If you are the person delegated and trained according to state laws, including regulations, be ready to use an epinephrine auto-injector if needed.
- After each food allergy emergency, participate in a review of how it was handled with the school administrator, school doctor (if applicable), school nurse, parents, staff members involved in the response, EMS responders, and the student to identify ways to prevent future allergic reactions and to improve emergency response.
- Help students with food allergies transition back to school after an emergency.
- Be prepared to respond to the emotional needs of students who witness a life-threatening allergic reaction in a way that does not compromise the students' privacy or confidentiality rights.

### ***4. Participate in professional development on food allergies.***

- Work with the school or district nurse and other health professionals to support training and education for staff on the mental and emotional health issues faced by a student with food allergies.
- Complete training to help you recognize and understand the following:
  - Signs and symptoms of food allergies and how they are communicated by students.
  - How to read food labels and identify allergens.
  - How to use an epinephrine auto-injector (if delegated and trained to do so).
  - How to deal with emergencies in the school in ways that are consistent with a student's ECP.
  - Your role in implementing a child's ECP.
  - FERPA, USDA, and other federal and state laws that protect the privacy or confidentiality of student information and other legal rights of students with food allergies. (See Section 5 for more information about federal laws.)
  - Policies that prohibit discrimination and bullying against students with food allergies.

### ***5. Provide food allergy education to students and parents.***

- Work with classroom teachers and other school staff to educate parents and students about bullying and discrimination against students with food allergies.