Managing Food Allergies in Schools

USDA Food and Nutrition Service Agency
Samia Hamdan, MPH, RD
Julie Skolmowski, MPH, RD
Laura Walter, MPH, RD
Today’s Roadmap

* Overview of food allergies
* Accommodating students with food allergies in USDA school meals programs
  * Documentation requirements
  * Roles of school employees
* Strategies for preparing safe meals
* Food allergens and USDA Foods
* Food allergies have steadily increased among school-aged children between 1997-2011

Food Allergy Prevalence Among Children

- 3.4% in 1997-1999
- 5.1% in 2009-2011

*Trends in Allergic Conditions Among Children, United States, 1997-2011, CDC NCHS Data Brief, No 21, May 2013*
What is a food allergy?

* A **food allergy** is an abnormal immune response to a certain food that the body reacts to as harmful.
* A **food intolerance** is an adverse reaction to food that does not involve the immune system.
* **Milk allergy vs lactose intolerance**
Anaphylaxis is a potentially life threatening condition

Exposure to food allergens is the most common cause of anaphylaxis – peanuts, tree nuts, fish and shellfish
Top Food Allergens

- Cow’s milk
- Eggs
- Peanuts
- Tree nuts
- Fish
- Shellfish
- Soybeans
- Wheat
Food Allergies at School

* Nearly 18% of children with food allergies had reactions while in school
* 25% of anaphylaxis reactions in schools occur without previous diagnosis
* Schools should be ready to effectively manage students with known food allergies and potentially *unknown*
Food Allergy Emergency Plan

* 4 out of 6 deaths from a food allergy examined in one report occurred in schools

* School staff must be prepared and trained on how to handle reaction to allergic symptoms

Disability laws

Five laws and regulations ensure children with disabilities have access to USDA Child Nutrition Programs

- The Rehabilitation Act of 1973
- The Individuals with Disabilities Education Act
- Americans with Disabilities Act
- 7 Code of Federal Regulations Part 15b
- 7 Code of Federal Regulations 210.10(g)
What is the definition of disability?

* A condition that substantially limits one or more major life activities; or
* A record of such a condition; or
* Being regarded as having such a condition.

**BREATHING** can be impacted by food allergies.
ADA Amendments Act of 2008

- Amends federal definition of disability to include additional individuals
- Broadens definition of “major life activity” and includes “major bodily functions”
- May increase number of individuals diagnosed and requesting accommodations

_FNS Guidance Related to the ADA Amendments Act, SP 36-2013_
Major life activities and bodily functions

**Major Life Activity**
- Caring for oneself
- Performing manual tasks
- Seeing
- Hearing
- Eating
- Sleeping
- Walking
- Standing
- Lifting
- Bending
- Speaking
- Reading
- Concentrating
- Thinking
- Communications
- Working

**Major Bodily Functions**
- Immune system
- Normal cell growth
- Digestive
- Bowel
- Bladder
- Neurological
- Brain
- Respiratory
- Circulatory
- Cardiovascular
- Endocrine
- Reproductive functions

42 USC 12102(2)(B)
When are food allergies considered disabilities?

* Disability must be determined by a licensed physician and a written statement must be provided.
Required statement for children with disabilities

* Identify the disability
* How it restricts diet
* Major life activity affected
* Foods to be omitted
* Foods to be substituted
Everyone has a role in accommodating disabilities
Accommodation must be made
A disability determination can only be made by a licensed physician
No extra charge to the student
In the most integrated setting appropriate
A school should never revise, interpret or change a diet prescription or medical order
Parent/Guardian Role

* Notify school before start of school year
* Have doctor complete the necessary forms
* Deliver/provide approved medications to school nurse
* Meet with school nurse and other school staff
School Nurse Role

- Develop an Individual Health Care Plan with parents/guardians and 504/school team.
- Arrange for periodic review of plan at least annually.
- Provide education and training to all need-to-know school staff – especially the child’s teacher(s).
Establish a basic Medical Emergency Plan

Ensure that an IHCP for each child with a life-threatening allergy is created and implemented.

Establish a procedure for how and when school staff should communicate.

Develop policies and procedures on bullying

Establish protocols for class field trips and teacher substitutes
Transportation Staff Role

- School team meetings
- Training
- Communication
- Policy for food on bus
School Requirements for Children with Special Diet Needs (Not Disabilities)

* School are *encouraged* to make accommodations
* Accommodate on a case by case basis
Required Statement for Children with Special Diet Needs (Not Disability)

- Signed by a “recognized medical authority”
- Identifies medical or special dietary need
- Food(s) to be omitted
- Food(s) to be substituted
Fluid Milk Substitution Rule

* Establishes nutrient standards for nondairy beverage alternatives to fluid milk
* Allows schools to accept written request from parent or legal guardian

Fluid Milk Substitutions Rule in the School Nutrition Programs (73 FR 52903, September 12, 2008)
Resources
to help you effectively
manage food allergies
Offer vs Serve

* Implement OVS to help accommodate all special diet needs
  * Students can decline 2 of 5 components at lunch, and are only required to take 3 items at breakfast.
* Provide choices at breakfast and lunch to accommodate and integrate students
Coming Soon!

- Release of the revised FNS Accommodating Special Diet Needs in the School Nutrition Programs Guidance
- Revised FNS Instruction 783-2, Revision 2, Meal Substitutions for Medical or Other Special Dietary Reasons
Healthy Meals Resource Systems
Food Allergy Resource and Education
Safe@School Training Program
www.foodallergy.com

* C.A.R.E
  * Comprehend basic
  * Avoid food allergens
  * Recognize reaction
  * Enact emergency plan

Free online interactive course for school personnel
* Identifies student
* The allergen
* Emergency contact info
* Clear instructions on when and how to administer medication, including Epi-Pen
Policy guide to assist K-12 school boards in developing a comprehensive food allergy plan

- Identification of students with food allergies and provision of school health services
- Individual written management plans
- Medication protocols: storage, access, and administration
- Healthy school environments: comprehensive and coordinated approach
- Communication and confidentiality
- Emergency response
- Professional development and training for school personnel
- Awareness education for students
- Awareness education and resources for parents/caregivers
- Monitoring and evaluation
Food Safety Tips and Resources
Food Allergy Book: What School Employees Need to Know

* Published in 2012, by NEA HIN in partnership with USDA
* Contains overview of food allergies and allergic reactions at school
* Explains the roles of various school employees
* Also available in Spanish

More information: http://www.neahin.org/educator-resources/foodallergybook.html
What Do School Employees Need to Know How to Do?

* Recognize an allergic reaction
* Respond to an allergic reaction
* Read an emergency care plan
Preventing Allergic Reactions

* The **only** way to prevent a reaction is to avoid exposure to the allergen
* Strategies to avoid exposure:
  * Read labels to identify food allergens
  * Avoid cross contact
Reading Labels

* Read every label, every time
* If you are not sure whether a product contains allergens, always contact someone to clarify
  * Supervisor
  * Manufacturer

* USDA and NFSMI Resources: http://nfsmi.org/foodallergy
USDA and NFSMI Food Allergy Fact Sheets

FOOD ALLERGY FACT SHEET

Managing Food Allergies: Child Nutrition Staff

1. Know your district or school food allergy policy.
   - Read your district or school food allergy policy.
   - Understand your role in keeping students with food allergies safe.
   - Know how to accept the school’s emergency action plan if a student has an allergic reaction.

2. Be familiar with each student’s medical statement and Food Allergy Action Plan.
   - Follow the instructions in the student’s medical statement.
   - Understand each student’s Food Allergy Action Plan and keep it in a place that is easy to find.
   - Seek clarification from the parent if the medical statement is unclear.
   - Know your school’s system to identify students who have food allergies.
   - Keep all student information current.

3. Read ingredient labels to check for allergens (foods that can cause allergic reactions).
   - Most ingredient labels list the top eight foods causing allergic reactions using four common names (eggs, milk, soy, tree nuts, wheat, fish, shellfish, and crustacean shellfish).
   - Check labels for wording such as “may contain,” “processed on shared equipment,” or “produced in a plant that uses.”
   - These foods should not be served to students with allergies.
   - Check labels for allergens on every product that is purchased. Contact the manufacturer of the label if it is unclear.
   - Maintain labels for a minimum of 24 hours after the food is served.

4. Avoid cross-contact when preparing and serving food.
   - Wash hands with soap and water before and after each task. Use separate knives, cutting boards, and utensils for food that is not removed from allergens.
   - Wash, rinse, and sanitize all equipment before and after each task when preparing allergen-free foods.
   - Clean and sanitize all food contact surfaces.
   - Designate an allergy-free zone in the kitchen. When working with multiple food allergies, set up procedures to prevent cross-contact.
   - Follow standard recipes exactly as written.
   - Use separate utensils and equipment for allergy-free foods.
   - Clean and sanitize tables and chairs before and after each use and as needed.

FOOD ALLERGY STANDARD OPERATING PROCEDURES

Serving Safe Food to Students with Food Allergies

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

SCOPE: This procedure applies to all staff involved in preparing and serving food to students with food allergies.

KEY WORDS: Allergies, Gluten, Cross-contact, Hand washing

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 foods 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 allergen-free food.
   - Wash, rinse, and sanitize all equipment before and after each use.
   - Wash, rinse, and sanitize all food contact surfaces.
   - Designate an allergy-free zone in the kitchen.
   - When working with multiple food allergies, set up procedures to prevent cross-contact within the allergy-free zone.
   - Prepare food items that do not contain allergens first. Label and store the allergy-free items separately.
   - Use a clean, sanitized cutting board when preparing food.
   - Use clean utensils and equipment for allergy-free foods.
   - Follow your school’s procedures for sanitizing equipment.
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 served.
   - Use dedicated serving utensils and gloves for allergen-free foods.
   - Label items on the serving line correctly and clearly so that items containing food allergies 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 staff continually monitors receiving, preparation, and serving areas to assess whether food allergy procedures are being followed.

USDA and NFSMI Food Allergy Fact Sheets (cont.)

FOOD ALLERGY FACT SHEET

Milk Allergies

What age group is most likely to have a milk allergy?

Two to five percent of children under the age of three have a milk allergy, and cow’s milk allergy is the most common cause of allergic reactions in young children. This allergy is usually outgrown by the first few years of life, so it is more common in infants and young children than in adults.

Many proteins in milk can cause an allergic reaction. There are two main categories of proteins in milk:

1. Caseins—proteins found in the solid part or curd (part of milk that curdles)
2. Whey—proteins found in the liquid part of milk (what remains after milk curdles)

What are the symptoms?

Milk allergies can cause a range of symptoms that occur within a few minutes to a few hours after exposure. Milk allergy can cause sneezing, which is a skin-reacting allergic reaction.

Symptoms of a milk allergy might include:

- Hives (urticaria)
- Diarrhea
- Rash
- Vomiting

Symptoms that may take more time to develop include:

- Wheezing, which may contain blood
- Cramps
- Abdominal cramps
- Coughing or wheezing
- Itchy nose
- Watery eyes
- Red or itchy skin, often around the mouth
- Colds in babies

What foods contain milk?

Individuals with a milk allergy need to follow a completely milk-free diet to avoid exposure. Eliminating milk and other dairy products such as cheese from the diet is obvious, but many non-dairy products and processed foods contain casein and whey (the proteins in milk). Reading food labels is important to eliminate exposure to ingredients that contain milk. Below is a list of products that contain milk and should be avoided:

- Butter
- Cheese (all types)
- Cottage cheese
- Cream
- Cream cheese
- Milk
- Cream
- Yogurt
- Ice cream
- Margarine
- Sour cream
- Trivia

Additional Label Reading Resources

* FDA
  * [http://www.fda.gov/food/resourcesforyou/consumers/ucm079311.htm](http://www.fda.gov/food/resourcesforyou/consumers/ucm079311.htm)
  * [http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106890.htm](http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106890.htm)

* FARE
Avoiding Cross Contact

* Use separate equipment and utensils when preparing foods for students with food allergies
* Prepare and store food for students with allergies separately
* Clean and sanitize all food preparation surfaces
A Few Food Allergy Topics

- Epinephrine
- Handwashing
- Classroom environments
What is epinephrine?

* A prescription medication
* Primary treatment for anaphylactic reactions
Handwashing

* Proper handwashing can help reduce the risk of exposure to food allergens

* Encourage students to wash hands with soap and water before and after food is handled or eaten

* Encourage school staff and volunteers who assist children with meals or snacks to wash hands with soap and water
Effective Handwashing

* Wet hands with clean running water and apply soap
* Rub hands together, scrubbing backs of hands, between fingers, and under nails for **20 seconds**
* Rinse hands under running water
* Dry hands using a clean towel or air dry them
Effective Handwashing (cont.)

* When soap and water are not available, use disposable hand wipes before and after eating

* The following methods are **NOT effective** in removing food allergens:
  * Alcohol-based hand sanitizers
  * Washing with water alone
Strategies to Manage Food Allergies When Meals and Snacks Are Served in Classrooms

* Wash hands
* Label and separate foods containing allergens
* Avoid cross contact
* Clean and sanitize desks and other surfaces
Other Food Allergy Concerns in Classroom Environments

* Be aware of potential allergens in both food and non-food items
  * Arts and crafts supplies
  * Science experiments
  * Counting exercises
  * Cooking activities
  * Celebrations

* Examples: modeling clay, finger paints, science kits, paper mache, crayons, seeds, etc.
Additional Food Allergy Topics

- Bullying and mental health
- School buses
- After school activities
USDA Office of Food Safety

Schools need nutrition and allergen information to make ordering decisions
USDA Foods Solutions

* Short term – Add language to require info as part of company’s bid response (example: CN labeling requirement for beef patties)

* Long term – Explore centralized database for nutrition, ingredient, allergen info
* Assist States/Schools with obtaining vendor information
* Review all specifications for SY 2014-2015
* Explore easily to understand indicators for allergens on the Foods Available List
* Make it easier for schools to provide feedback through website
Despite the challenges and frustrations, remember the goal!