

FARE
F o o r y R



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Introduction

Researchers estimate that up to 32 million Americans, including one in 13 children, have food allergies. In fact, a 2013 report released by the Centers for Disease Control and Prevention found that the number of children with food allergies in the U.S. increased 50 percent between 1997 and 2011.

Food allergy reactions send someone to the emergency department every three minutes, resulting in more than 200,000 emergency department visits in the U.S. per year. The increasing number of people with food allergies, coupled with the fact that teenagers and young adults are at the highest risk for fatal food-induced anaphylaxis, makes this a critical issue for colleges and universities.

In addition, the settlement agreement between the U.S. Department of Justice and Lesley University in December 2012 increased awareness among higher education professionals that food allergies and celiac disease may qualify as a disability under the Americans with Disabilities Act (ADA).

A disability as defined by the ADA is a mental or physical impairment that substantially limits a major life activity, such as eating. Major life activities also include major bodily functions, such as the functions of the gastrointestinal system. Some individuals with food allergies have a disability as defined by ADA, particularly those with more significant or severe responses to certain foods. This would include individuals with celiac disease and others who have autoimmune responses to certain foods, the symptoms of which may include difficulty swallowing or breathing, asthma, or anaphylactic shock.¹

Establishing a campus-wide approach, solid policies and procedures, and effective training are essential to providing a safe and inclusive environment. Because no two schools are the same, the plans that work best on one campus may not be the best solution on another. This guide is a resource to assist colleges and universities in best serving their campus communities' needs and was developed with the input of various campus stakeholders from disability services, dining services, health services and resident life.

The Access Services Guidance for Students with Disabilities is intended to assist disability services, resident life, health services, student affairs and other departments in creating and implementing effective policies and services to meet the needs of students with food allergies and celiac disease throughout the college setting.

¹ U.S. Department of Justice Civil Rights Division. Questions and Answers About the Lesley University Agreement and Potential Implications for Individuals with Food Allergies. Available at www.ada.gov/q&a_lesley_university.htm. Accessed Nov. 5, 2014.

Access Services Guidance for Students with Disabilities

The number of college students with food allergies and celiac disease is growing. Many of these students have received important supports and services throughout their elementary and high school years that will only continue into college when they know to ask for them. When college students are connected to the appropriate services on campus, most dietary concerns can be successfully managed and the risk of potentially life-threatening reactions can be greatly reduced.

A critical first step to ensuring successful management of food allergies on campus is helping students understand the process for disclosing their food allergies and requesting services.

Best Practices for Food Allergy Management on Campus

The following principles represent best practices for addressing the needs of students with food allergies. Schools should develop and maintain:

- A collaborative, campus-wide approach.
- A transparent and flexible process capable of meeting student needs without being burdensome.
- A comprehensive food allergy policy that includes:
 - § A clear process for requesting accommodations/modifications,
 - § Documentation required to establish an individual's food allergy as a disability,
 - § A process for determining appropriate accommodations/modifications,
 - § Implementation of accommodations/modifications,
 - § Outreach and marketing, and
 - § Assessment of services.
- Emergency response plans and training.
- Confidentiality.
 - § As with other medical information, information about a student's food allergy or celiac disease should only be shared with those staff members directly involved in the implementation of accommodations/modifications, or in the emergency plans for these students.

See Appendix page 16 for examples of policies.

Components of an Effective Food Allergy Policy

A policy that covers food allergies may be written as a separate policy or included within a disability policy for the campus. Ensure that policies and procedures (including grievance procedures) are clear, well documented, widely publicized and regularly reviewed. Whether the policy stands on its own or is incorporated within your existing policies, following are important areas it must cover.

A Clear Process for Requesting Accommodations/Modifications

Communicating with college students requires ensuring that the message is repeated in different campus venues and programs. Colleges should seek to make the food allergy accommodation process easy to find in a centralized resource online, as well as easy to understand and follow. Students will likely seek out the information in different places, which is why all food allergy information should funnel students toward a centralized resource.

A determination of whether or not the information supplied adequately documents the existence of a current disability and need for accommodation/modification is critical. If the documentation does not meet the institution's requirements, the student should be notified in a timely manner so that additional documentation may be gathered.

While not required for documentation, some students may also provide a more comprehensive medical evaluation from their physician. Additional information from the student's doctor can help guide the institution and student on the most appropriate plan to meet the student's individual needs. A comprehensive medical evaluation can be reviewed in consultation with health services on campus and might include the following items:

- Documentation of a past severe allergic reaction to a particular food(s).
- Records of allergy testing, which might include skin prick tests, blood tests, oral food challenges or elimination diets.
- Specific recommendations for appropriate accommodations through housing services, dining services or other departments. This might include options for a single room accommodation, access to a kitchen with separate storage of

Academic Accommodations

- Flexibility with attendance and/or deadlines when students experience a food allergy or celiac reaction.
- Class adjustments, if necessary and appropriate. For example, a culinary student may need to prepare only foods without their allergen(s) or a biology student may need to avoid handling their allergen(s) in a lab.

Implementation of Accommodations/Modifications

Initial research shows that the most effective food allergy strategy for a college or university is to appoint a centralized department to oversee food allergy accommodation requests, manage the implementation of a food allergy policy, and champion the needs of students with food allergies on campus. However, it must be noted that no single department can effectively reach all students on campus. Instead, a college should develop a Food Allergy Team of key stakeholders that share the responsibilities of reaching students and ensuring accommodations are effectively implemented. At minimum, the team should consist of at least one representative from dining services, housing services, disability services, health services, and campus emergency responders. Departments to consider for inclusion:

- **Disability Services** - to manage the process that students must follow in order to qualify for accommodations.
- **Dining Services** - to implement the food accommodations and emergency response plans for the dining halls.
- **Housing Services** - to implement housing accommodations and emergency response plans for the dorms.
- **Health Services** - to address medical concerns, documentation and training laypeople as needed.
- **Campus emergency responders** - to assist with and implement emergency plans.
- **Marketing/communications team** - to help with communication of food allergy policy/plan to students.
- **University attorney** - to assist with policy creation/disclaimers as needed.

In addition, a group of liaisons should be developed to broaden outreach to students with food allergies and celiac disease to ensure they are able to fully participate in university events and programs. Those liaisons would be targeted for outreach efforts. The departments/offices in this liaison group could include, but are not limited to:

- **Office for Parent Programs**
- **Event Planning Staff/Catering**
- **Athletics**
- **Greek Life**
- **Alumni Groups**
- **ROTC**
- **Student Groups**
- **Student Affairs**
- **Incoming Student Orientation Staff**

Consider what programs and activities are held on your campus to determine which departments should be included in your outreach efforts.

In addition to helping with the implementation of food allergy accommodations/modifications, partnering with these departments will serve multiple functions. First, it will help educate key personnel on food allergy policies. Secondly, it will strengthen existing relationships between the departments, which ensures an effective flow of information during the implementation process. Lastly, including key department representatives will ensure the university staff around campus

are aware of the centralized channel for requesting and receiving food allergy accommodations, regardless of which department takes this role.

Outreach and Marketing

It is important that students disclose their food allergies or celiac disease to the institution, preferably before arriving

- Develop a one-on-one connection with students with food allergies and celiac disease that allows for open communication. Do this via whatever method the student is most comfortable with (text messages, email, in-person meetings, etc.). It'll allow you to customize your approach to each student and will help you gauge the success of your program.
- Talk with other departments to gauge how the accommodations/modifications process is working in different areas.

In addition, create an incident report system for students and staff to report any food allergy or celiac reactions. When mistakes happen, follow up on them to see where the process broke down. Develop plans to avoid the same mistakes in the future.

Components of an Effective Food Allergy Policy Section Checklist

- Create a clear process for requesting food allergy accommodations, and make sure this information is easy to find online from multiple sources (dining services website, university homepage, etc.).
- Determine what documentation is required to establish students' dietary restrictions as a disability.
- Create a process for determining what appropriate accommodations will be. Note that accommodations will need to be determined on a case-by-case basis and in collaboration with the student.
- Develop partnerships with other departments to implement accommodations.
- Leverage your partnerships with other departments to market and communicate food allergy policies and procedures to staff and students.
- Create a process to assess the services being offered and identify areas for improvement.

Emergency Response Plans and Training for Food Allergies

The majority of allergic reactions will occur where a student lives and eats, which includes dining halls, residence halls, sports arenas and even classrooms. While your university likely has emergency procedures already in place, it is important that a consistent emergency response plan for food allergies is created and distributed.

Creating an Emergency Response Plan

For severe allergic reactions known as anaphylaxis, administering epinephrine promptly is the best way to save lives. Any delay in administering epinephrine increases the risk of death, so ensuring rapid access to epinephrine needs to be a top priority. When creating an emergency response plan for food allergy reactions and anaphylaxis, consider the following questions:

1. If someone dials 911 from a university phone, will they reach an outside emergency services provider or campus security? How quickly can emergency responders arrive?
2. Will campus or city emergency responders be sent when 911 is dialed? Will the emergency responders sent have epinephrine with them? Note: In some jurisdictions, emergency responders do not automatically carry epinephrine.
3. Will you keep stock epinephrine (undesignated epinephrine that can be used for any person experiencing a severe allergic reaction) around your campus and allow key staff to be trained to administer it?
 - § Many states have legislation allowing public places, like colleges and universities, to keep epinephrine on hand for use in an emergency. Visit foodallergy.org/access to learn more.
 - § To learn how to recognize and respond to anaphylaxis, visit foodallergy.org/savealife
4. If a student has an epinephrine auto-injector, but is unable to inject themselves during a reaction, will university staff—including resident advisors—be trained on how to administer it? If not, what will the plan be for getting the epinephrine administered in a timely manner?
 - § For information on the different types of epinephrine auto-injectors and how to use them, please visit: foodallergy.org/treating-an-allergic-reaction/epinephrine.
5. Where is the nearest medical center that can treat an allergic reaction?
6. Who will undergo emergency response training? At minimum, this should be staff who work in areas where students live and eat.

A student with a prescription for epinephrine should always carry their auto-injector with them, but in case a student does not have their epinephrine, or a person with a previously undiagnosed allergy has a reaction, it is important to consider the timeliest way to access epinephrine.

Training

Staff who will be involved with food allergy accommodations should undergo proper training so that they can effectively serve students. Most people realize, for example, that dining services staff need to understand how to safely prepare foods for diners with food allergies and celiac disease. However, it is also important that others working with students, particularly those who work where students consume food, receive training.

Consider, will a resident advisor know what to do if a student experiences an allergic reaction in a dorm room? Will a cashier in the dining hall know what to do if a student experiences an allergic reaction? Proper training can save lives. Food allergy training should include the following information:

1. Food allergy and celiac disease basics (including statistics and descriptions).
 - § To learn more about food allergies, visit foodallergy.org.
 - § To learn more about celiac disease, visit celiaccentral.org.



RAs should also know that anaphylaxis and intoxication share many of the same symptoms, including flushed skin, confusion, vomiting and passing out. They should never assume a student with a food allergy is intoxicated, as the student may be in anaphylaxis and in immediate need of medical attention.

Dining Services Additional Training

In addition to the training mentioned above, dining services staff will need in-depth training on how to plan, prepare and serve food safe for diners with food allergies and celiac disease. Additional information for dining services can be found in FARE's Pilot Guidelines for Managing Food Allergies at foodallergy.org/collegeresources.

Emergency Response and Training Section Checklist

- Create an emergency plan that considers the quickest way to get epinephrine to a student experiencing anaphylaxis.
- Train staff involved in food allergy accommodations, particularly staff in dining services and housing services, on food allergies, how to recognize and respond to a food allergy reaction, and on campus emergency plans for anaphylaxis.
- Provide additional training for resident advisors (RAs) on helping students become their own self-advocates, mediating conflicts surrounding food in dorm rooms and recognizing the symptoms of anaphylaxis.

Sample Access Services Policies

Here are two examples of policies addressing food allergy accommodations. The first, adapted from Siena College's policy, is specifically written to address accommodations for students with food allergies.

Siena College

Policy on Food Allergy Accommodations for Students¹

Introduction

Siena College recognizes that mealtimes provide a social opportunity to enjoy conversation, relaxation and good food. We offer a variety of foods that promote a healthy lifestyle. We also recognize that some individuals have one or more food allergies that require them more time and effort in managing their diet. We make every effort to provide helpful information to members of our campus community who have to manage their food allergies when eating on campus.

If an individual has been diagnosed by a physician with a life threatening food allergy, this may constitute a disability under the Americans with Disability Act. Siena College complies with Title III of the Americans with Disabilities Act

Dining Services provides the following:

1. Individual counseling
2. Nutrition facts on their website
3. A trained staff to answer questions and help with selections who wear badges to inform the public of their status
4. Precautions to prevent cross-contact, including a freezer for gluten free foods and one for nut free foods
5. Special foods available on a daily basis, including many gluten-free foods, soy milk, lactose free milk, and foods cooked to order
6. Signs posted at point-of-sale alerting students to foods containing the eight major food allergens (shellfish, fish, peanuts, tree nuts, soy, wheat, milk, eggs)
7. Use of canola or corn oil

We train our food staff on the severity of food allergies. This training includes instruction on food allergies, including food products that contain allergens, cross-contact and proper food storage and preparation, how to answer inquiries regarding food allergies and Siena's policy for requesting an accommodation for a food allergy.

We label items with possible allergen-containing ingredients. We understand that there is always a risk of cross-contact. We ask that students with food allergies be aware of this risk.

We also recognize that students with food allergies may wish to not eat at the dining hall but want to visit with friends. Students may go through meal plan/dining services accommodation procedures to access the dining hall; they will not be charged for any meals however.

Nutrition counseling is available to Siena students on a year-round basis. The services of a Licensed, Registered Dietitian are available to students wanting information on general nutrition, weight management, food allergies, or specific therapeutic diets. The nutrition office is located in the Lower Serra Hall and appointments can be made by calling XXXXXXXX XXXXXXXXX, Sodexo.

Procedures

Students with special requests due to a food allergy are strongly encouraged to make the College aware of these needs as early as possible when they begin their studies. The following procedure must be followed.

1. Students must contact the Director of Health Services to request the following form: *Meal Plan Modification Due to Medical Circumstances*.
2. Students must provide current and appropriate medical documentation to support their request for a meal plan accommodation that is completed by the student's physician.
3. Students will be asked to sign a general release so information related to their food allergies can be shared with others, including, but limited to: the Director of Services for Students with Disabilities, Director of Dining Services, Sodexo's

responsibility and student's responsibility for safely managing food allergies while attending classes or functions or residing on campus. Items on these plans will include ways to notify individuals about allergic reactions and access emergency responders at the College. The student, Director of Health Services and Director of Services for

Rather than creating a separate policy for food allergies and celiac disease, Lesley University incorporated food allergies and celiac disease into its existing disability policy.

Lesley University

Reasonable Modifications of Policies, Practices, and Procedures for Students with Disabilities³

Lesley University is committed to the full participation of its students in all of its programs. In addition to this long-standing Lesley philosophy, students with disabilities have specific legal rights guaranteed by the Americans with Disabilities Act (ADA), a civil rights law enacted to protect individuals from discrimination on the basis of disability. Title III of the ADA prohibits discrimination on the basis of disability in the full and equal enjoyment of goods, services, facilities, privileges, advantages, and accommodations of public accommodations, such as universities. The following is a summary of Lesley University's policies and procedures for students with disabilities seeking reasonable modifications under the ADA (sometimes colloquially termed and referred to by Lesley as "reasonable accommodations").

An essential component of Title III of the ADA is the right of a qualified individual with a disability to a reasonable modification of policies where necessary to afford such individual an equal benefit. The process for obtaining a reasonable

Sample Forms From Universities

College of the Holy Cross, Dining Statement of Student Responsibility

Allergy Kitchen Usage Agreement

By accepting access to the Kimball Main "Allergy Pantry" I am acknowledging my responsibility to:

- Maintain proper allergy precautions to **prevent cross-contact**.
- **Never bring any foods into** the allergy kitchen.
- **Never bring another person** into the allergy kitchen.
- Abide by the honor system you may consume as much food as you like while in Kimball, only take out of Kimball "one snack" per meal.
- Acknowledge that I may be monitored by closed circuit camera while in the Allergy Pantry.
- Protect myself by **reading labels**, sanitizing counters before use and/or put down protective paper on counter.
- Use protective gloves when appropriate.
-



Medical Statement for Students Requesting Dietary Accommodations for Medical Reasons

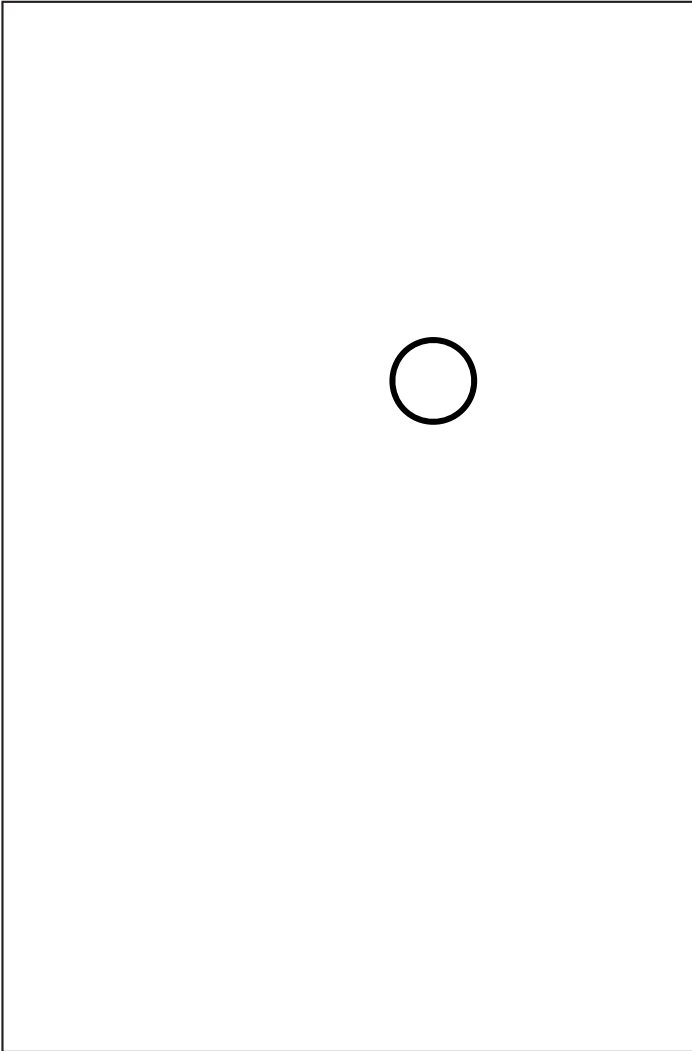
Student Name	Student DOB
Campus Address and Phone Number	E-Mail
Permanent Address	Emergency Contact Information
Medical Doctor Name	Medical Doctor Address and Phone Number

Student with a documented food allergy



Courtesy of University of Kansas

FARE Food Allergy & Anaphylaxis Emergency Care Plan





[Empty rectangular box for notes or additional information]

[Empty rectangular box for notes or additional information]

EMERGENCY CONTACTS — CALL 911		OTHER EMERGENCY CONTACTS	
RESCUE SQUAD: _____	PHONE: _____	NAME/RELATIONSHIP: _____	PHONE: _____
DOCTOR: _____	PHONE: _____	NAME/RELATIONSHIP: _____	PHONE: _____
PARENT/GUARDIAN: _____	PHONE: _____	NAME/RELATIONSHIP: _____	PHONE: _____

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