

PROCEDURES FOR IMPLEMENTING BOARD POLICY: **FOOD ALLERGY** 8235  
**MANAGEMENT PROGRAM** Page 1 of 8 pages

Section A - Implementing a Food Allergy Management Program

The following procedure implements Policy **Food Allergy Management Program** (8235), which is based upon the joint Illinois State Board of Education (ISBE) and Illinois Department of Public Health (IDPH) publication, *Guidelines for Managing Life-Threatening Food Allergies in Schools (ISBE/IDPH Guidelines)*, (105 ILCS 5/2-3.18 (the “Act”), as amended from time to time. The District’s Food Allergy Management Program is developed by the District and collectively implemented by school officials, District staff, students and parents/guardians.

Section B - Glossary of Terms

For purposes of this procedure, the following definitions apply:

**Emergency Action Plan (EAP)** – A written plan that identifies a student’s food allergens and provides the specific steps to be taken by school personnel should the student have exposure to a food allergen and/or is suspected of having an allergic reaction to a food allergen. The EAP must provide, that, at a minimum, when the student has been or is suspected of having been exposed to a food allergen and/or exhibiting symptoms of an allergic reaction, designated school personnel will (1) administer epinephrine to the student, if the parent/guardian has provided written consent for the administration of medication, (2) seek emergency medical services (i.e., call 911) for emergency transport of the student to the nearest hospital, and (3) send a written notice to the parents/guardians. The EAP must be included as part of the Individual Health Care Plan (IHCP), Section 504 Plan, or IEP of a student with life-threatening food allergy.

**Food Allergy Management Program (Program)** - The overall process that the Superintendent, administrators, and District staff use to implement Policy **Food Allergy Management Program** (8235), which is consistent with the Act.

**Food Allergy Management Committee (Committee)** - A team of District personnel selected by the Superintendent. The Committee develops and monitors a Food Allergy Management Program to ensure the Program’s continued legal compliance and consistency with the *ISBE/IDPH Guidelines*.

**Individual Food Allergy Management** - The process used by District personnel in each building to manage and reduce the risk of anaphylaxis of students with life-threatening food allergies. The process identifies: (a) students with allergies, (b) procedures to attempt to prevent exposure to known allergens, and (c) appropriate responses to allergic reactions. The process includes the development, implementation, and periodic review of a student’s Individual Health Care Plan (IHCP), Section 504 Plan, or IEP.

**Individual Health Care Plan (IHCP)** – A written plan that outlines the needs of a student with life-threatening allergies in the school environment. The IHCP will include precautions to be taken by school personnel and/or the student to minimize the student’s exposure to a food allergen, procedures to respond to a student’s allergic reaction, and emergency procedures to be followed should the student have exposure to a food allergen and/or is suspected of having an allergic reaction to a food allergen (i.e., an EAP). An IHCP is developed when a student with life-threatening allergies is not otherwise eligible for special education and related services as a student with disabilities under the IDEA or Section 504 of the *Rehabilitation Act of 1973*.

**Life-Threatening Food Allergy** – The general term used in these procedures for when a student’s food allergy poses a risk of anaphylaxis, which is the medical term for a severe allergic reaction. Symptoms of anaphylaxis may include hives, itching, vomiting, coughing, wheezing, swelling, difficulty breathing or swallowing, and a loss or sudden change in extent of/degree of consciousness.

**Parent/Guardian** – The parent or court-appointed guardian if the student is disabled or under the age of 18; or the student, if the student is not under a disability and is 18 years of age or older, unless the student has authorized a parent or guardian to act in his or her behalf.

Section C - Food Allergy Management Program

<b>Actor</b>	<b>Action</b>
<p>Superintendent or designee</p>	<p>Establish a Food Allergy Management Committee (Committee) to operate as a Superintendent committee. This committee is to include, but is not limited to, the following:</p> <ul style="list-style-type: none"> <li>Assistant Superintendent for Education Services</li> <li>Director of Operations and Purchasing</li> <li>Director of Special Education</li> <li>Associate Principals for Administrative Services</li> <li>School Nurses</li> <li>Parents/Guardians (optional)</li> <li>Community members (optional)</li> <li>Students (optional)</li> </ul> <p>Inform Board of Education of the Committee’s activities and any issues raised by and/or to the Committee.</p>
<p>Food Allergy Management Committee</p>	<p>Review existing Board Policies, administrative procedures and forms relevant to the implementation of the Program.</p> <p>Provide the Superintendent or designee with recommended policy changes to submit to the Board of Education for consideration.</p> <p>Provide the Superintendent or designee with recommended changes to administrative procedures. Assess the feasibility of providing staff training during a Periodic Emergency Response Drill to the District’s School Safety Drill Program.</p> <p>If the District participates in a federally-funded nutrition program, assess the availability of substitutions or modifications in school meals.</p> <p>Assist the Superintendent or designee during meetings with Building Principals and other appropriate staff, to discuss implementation of the Program.</p> <p>Recommend possible presenters and topics related to students with food allergies, such as first aid, resuscitative techniques, recognizing symptoms of allergic reactions/anaphylaxis, and the use of epinephrine devices, to the Superintendent or designee for</p>

Actor	Action
	<p>the required in-service training program(s) for staff working with students.</p> <p>Provide Building Principals with information about the Program for distribution to students and their parents/guardians. Establish linkages and partnerships with community organizations that can assist the Committee with providing education to the school community about food allergy management issues in the school setting.</p> <p>Monitor the Program by periodically assessing its implementation and effectiveness and compliance with the Act.</p> <p>Identify and consider updated medical best practices.</p>
Building Principal	<p>Provide information about the Program to students and their parents/guardians. Inform the school community of the opportunities to better understand food allergy management issues.</p> <p>Implement the Program in the building by meeting with the School Nurse and other relevant staff to review the Program and the <i>ISBE/IDPH Guidelines</i> under the Act.</p> <p>Ensure that staff members and volunteers receive training about the Program and their responsibilities for Individual Food Allergy Management of students with life-threatening allergies. The training must inform staff members and volunteers to first use the student’s epinephrine auto-injector and then call 911 anytime an allergic reaction is suspected.</p> <p>Ensure that information about the District’s Program and any other building-related specifics of the Program is included in student handbooks.</p> <p>Facilitate the implementation of Individual Food Allergy Management and IHCP upon receipt of information from parents/guardians that a student has a food allergy.</p>
School Board	<p>Monitor Policy <b>Food Allergy Management Program</b> (8235) and consider recommendations made by the Committee.</p> <p>Consider and allocate the resources necessary for the Superintendent to successfully implement the Program.</p>

Individual Food Allergy Management

This section’s procedures are implemented each time the school identifies a student with a food allergy.

**Phase One: Identification of Students with Food Allergies**

<b>Actor</b>	<b>Action</b>
Parent/Guardian	<p>Inform the Building Principal, School Nurse, or designee of the student’s food allergy.</p> <p>Complete Allergy History Form and School Medication Authorization Form (see procedures <b>Administering Medication to Students</b> (8310). Return them to the Nurse.</p> <p>Provide consent for school personnel and the student’s private medical providers to exchange information.</p> <p>Participate in all meetings to assess and manage the student’s health needs in the school environment.</p>
Building Principal and/or School Nurse or Designee	<p>Convene a meeting with appropriate school personnel and the student, student’s parents/guardians to assess the student’s allergy management needs in the school environment.</p>
IEP, Section 504, or IHCP Team	<p>Gather relevant health/medical, and other information related to the student’s food allergy from the parents/guardians of the student.</p> <p>Request written consent from the parents/guardians to exchange information with the student’s health care provider(s).</p> <p>For a student who is not already identified as eligible for special education and related services under the IDEA or Section 504, review all available information and determine whether a referral for an evaluation is warranted using the District’s child find procedures under IDEA or Section 504 (see Board procedures <b>Programs for Students with Disabilities</b> (7110).</p> <p>If the District determines that an IDEA or Section 504 evaluation is not warranted, or conducts an IDEA or Section 504 evaluation and the team (including the parents/guardians) determines that the student is not IDEA- or Section 504-eligible, notify the parent/guardian in writing of the reasons for this determination, and provide an additional copy of the procedural safeguards and develop an Individual Health Care Plan (IHCP) for the student that includes, at a minimum, the following:</p> <ol style="list-style-type: none"> <li>1. Procedures to reduce the risk of the student’s exposure to the food allergens.</li> <li>2. Identification of school personnel and volunteers who need to be familiar with the student’s food allergy and</li> </ol>

<b>Actor</b>	<b>Action</b>
	<p>IHCP, such as food service staff, custodial staff, transportation staff, coaches or extracurricular supervisors.</p> <ol style="list-style-type: none"> <li>3. Identification of District personnel who are trained to administer epinephrine auto-injectors (EpiPens). For District personnel other than the school nurse/RN/LPN, identify the staff members who volunteer to administer an EpiPen to the student. Note: Under no circumstances shall teachers or other non-administrative school employees, except certified school nurses or non-certificated registered professional nurses, be required to administer medication to students.</li> <li>4. Identification of the location(s) in which the EpiPens will be stored, including a backup storage location.</li> <li>5. Process for the school nurse/RN/LPN or designee to monitor the EpiPens for expiration dates.</li> <li>6. An Emergency Action Plan (EAP) that provides the procedures to be followed by school personnel if the student is or suspected of being exposed to a food allergen and/or having an allergic reaction during the school day, traveling to or from school, during school-related events, and while on field trips. The EAP must address accidental exposures to a food allergen and take into consideration that exposure is more likely to occur during unusual/unplanned events, and in off-campus school activities.</li> <li>7. Determine whether medication will be administered to the student and/or whether the student will self-administer medication during the school day and/or at school-related events. See Board Policy and Procedures Administering Medication to Students (<b>8310.</b>)</li> </ol> <p>If the District determines that an IDEA or Section 504 evaluation is warranted and conducts an evaluation, and if the team (including the parents/guardians) determines that the student is IDEA- or Section 504-eligible, develop or revise the IEP or Section 504 plan in accordance with legal requirements, including the following:</p> <ol style="list-style-type: none"> <li>1. Identify the student’s individual needs in the school environment as a result of his/her allergy.</li> <li>2. Identify all necessary special education, related services, and/or accommodations to address the student’s needs.</li> <li>3. Determine which District staff members will be</li> </ol>

<b>Actor</b>	<b>Action</b>
	<p>responsible for implementing the special education, related services, and/or accommodations.</p> <ol style="list-style-type: none"> <li>4. Determine whether medication will be administered to the student and/or whether the student will self-administer medication during the school day and/or at school-related events. See Board Policy and Procedures Administering Medication to Students (<b>8310.</b>)</li> <li>5. Include all of the requirements for a IHCP as set forth above, including an Emergency Action Plan (EAP).</li> <li>6. Identify any staff members who volunteer to administer medication to the student in an emergency. Under no circumstances shall teachers or other non-administrative school employees, except certified school nurses, and non-certificated registered professional nurses, be required to administer medication to students.</li> </ol>

**Phase Two: Prevention of Exposure to Known Allergens**

<b>Actor</b>	<b>Action</b>
School Nurse or Designee	<p>Convene a meeting to educate all the staff members who will implement the IEP/Section 504 Plan/IHCP about their responsibilities.</p> <p>Identify all additional staff training need to implement the IEP/Section 504 Plan/IHCP.</p> <p>Ensure individual staff members perform their responsibilities as stated in the student’s IEP/Section 504 plan/IHCP.</p> <p>Facilitate the dissemination of accurate information to school personnel and volunteers about the student’s food allergy while respecting privacy rights.</p> <p>Provide a medical alert to other students and their parents/guardians. The communication should inform other students and their parents/guardians about the importance of keeping the educational setting free of the food allergen, however:</p> <ul style="list-style-type: none"> <li>• Request prior written consent from the student’s parents/guardians to disclose information about the student’s food allergy to other students and their parents/guardians.</li> <li>• If the parents/guardians do not provide written consent to disclose student information, ensure that disseminated information about the student’s food allergy does not disclose the student’s personally identifiable information.</li> </ul>

	<p>Prepare a list of answers to anticipated questions about managing the student’s health needs, as needed.</p> <p>Check any known competing interests between the student’s health needs and the needs of other individuals in the school (e.g., diabetes, service animals, etc.). Manage identified competing interests by:</p> <ol style="list-style-type: none"> <li>1. Consulting the Board Attorney, with approval of the Superintendent.</li> <li>2. Creating a method to monitor identified competing interests.</li> <li>3. Responding to future identified competing interests and managing them immediately.</li> <li>4. Modifying any other conditions as the facts of the situation require.</li> </ol> <p>Consult with the building principal or designee about needed staff training(s) or required resources related to students with food allergies, such as first aid, resuscitative techniques, recognizing symptoms of allergic reactions/anaphylaxis, and the use of epinephrine devices.</p>
District Personnel	<p>Implement and follow all identified responsibilities in the student’s IEP/Section 504 Plan/IHCP.</p> <p>Know the emergency procedures outlined in the student’s EAP and be prepared to follow them.</p>
Parent/Guardian	<p>Inform the School nurse or designee of any changes in the student’s health and/or medications.</p> <p>Provide the school nurse or designee with the student’s medication, in the original package with the proper prescription label. See Policy Board Policy and Procedures Administering Medication to Students <b>(8310.)</b></p>
Student	<p>Inform District personnel immediately if a food allergen is suspected in the school environment.</p> <p>Inform District personnel immediately if an allergic reaction is suspected.</p> <p>If appropriate, carry an epinephrine auto-injector (EpiPen) with him/her at all times in the school environment and at off-campus school activities.</p>

**Phase Three: Response to Allergic Reactions**

<b>Actor</b>	<b>Action</b>
IEP/Section 504/IHCP Team	Follow the procedures in the student's EAP that is included in the IEP/Section 504 Plan/IHCP.
School Personnel and Volunteers	Any time an allergic reaction is suspected, administer the epinephrine auto-injector to the student first, and then call 911 and the school nurse. Fatalities occur when epinephrine is delayed or withheld.
School Nurse or Designee	Complete the applicable items in the <i>Return to School After a Reaction Checklist</i> .  Upon receipt of the parent/guardian's written consent, consult with the students' medical provider.

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