Food Allergy* Management at CTY: Information for Parents and Students

*(Some of this also applies to other medical dietary restrictions such as gluten intolerance)*

Each summer at CTY, many students who have severe food allergies and/or other medical dietary restrictions attend summer programs. To handle the precautions necessary to keep these students safe, CTY has developed procedures and expectations for food allergy management.

Summary of Responsibilities in Food Allergy/Dietary Restriction Management
(adapted from FAAN “Guidelines for Managing Food Allergies at Camp”-  www.foodallergy.org)

Family Responsibility
Parents/guardians need to work to ensure they are providing key information and ask key questions regarding their child’s allergy. They should:

✓ Notify CTY of the student’s allergies or suspected allergies as early in the process as possible to allow time to arrange appropriate accommodations if needed.

✓ Complete **CTY’s Allergy Action Plan** This form provides CTY health and non-health staff more detailed information about the student’s allergy to support the student in managing the allergy on site and to be directed in what to do in case of an emergency. If a child has been prescribed epinephrine, this form must be completed and signed by physician. Families may also submit plan used by the student’s school during the regular year assuming it includes comparable information.

✓ Request appropriate accommodations if needed and provide needed documentation as early as possible in the process of registering. This should be done by May 15th at the latest.

✓ Have a list of questions prepared related to the child’s site/course/program such as if field trips or trips off campus are involved and what arrangements for food might be made for these. Pose these questions to full-time CTY staff prior to the summer.

✓ Make contact with full-time CTY staff to see about talking directly with host institution dining hall staff prior to the summer and/or on opening day.

✓ Ensure all medical forms are completed in their entirety with allergies documented.

✓ Ensure medications, including epinephrine, are up-to-date and documented on appropriate medical forms.

✓ Educate and review often with the child self-management skills of the allergy including:
  - Safe and unsafe foods
  - Strategies for avoiding exposure to unsafe foods
  - Symptoms of an allergic reaction
  - How and when to tell an adult about a possible allergic response
  - How to read a food label (e.g., at the campus bookstore, in pre-packaged foods in the dining hall)
  - How to use his/her epinephrine auto-injector
  - Strategies for keeping track of his/her epinephrine auto-injector at site

Student Responsibility
The student should be prepared to abide by the following guidelines in relation to his/her allergy while at CTY:

✓ Never trade food with other students.

✓ Eat only foods that s/he knows what the ingredients are (ask dining hall staff/CTY staff for help in identifying these things as needed).

✓ Read available labels of foods and check with CTY staff if needed.

✓ Be proactive in the management of mild reactions, such as seeking assistance from CTY staff if suspect having a reaction.
Tell an adult immediately if reaction seems to be starting, even if no visible appearance.
Do NOT go off alone if symptoms seem to be starting.
If prescribed an epinephrine auto-injector, the student should carry it at all times and share confidentially with CTY staff where does he/she carries the epinephrine auto-injector.
Do NOT share medication or leave it unattended at any time.

**CTY/Host Responsibility**
CTY, working with each host institution, also has several responsibilities. These include:

- Being informed of the availability of emergency care. (knowing how to contact EMT/ambulance, typically how much time it takes for these services to arrive, distance to nearest hospital, if hospital has a MD present at all times).
- Ensuring that for trips off campus (field trips or residential trips to nearby stores/areas) or across a large campus, staff have a way to communicate quickly back to the main office/health office of the site and to call appropriate emergency services.
- Reviewing all student medical forms carefully and follow-up with parents/physicians about questions or concerns.
- Establishing prevention protocols for the site. This should include:
  - Discussing meal plans and any necessary accommodations with the parents/student ahead of time so alternative plans can be made if required.
  - Maintaining an appropriate sense of confidentiality and respect for individual privacy.
  - Plans so that students with allergies can safely participate in all activities.
  - Planning for any off campus trips (ensuring necessary medications and plans accompany a student with allergy, alternative plans for meals are made if needed, and staff accompanying student are appropriately trained).
  - Informing appropriate host institution and CTY staff about a student’s allergy.
  - Ensuring all dining hall/cafeteria staff are aware of and can identify any student with food allergy (whether knowing the child themselves or knowing CTY staff to ask).
  - Training all staff on use of epinephrine auto-injectors.
  - Educating CTY staff that will be in contact with the student about symptoms to look for that may indicate an allergic reaction, protocols on any individual student’s Allergy Action Plan, and what action to take when.
  - Ensuring proper medication storage and distribution according to CTY and state regulations.
  - Establishing and communicating a plan for treatment of allergic reactions in students who had no known allergies before coming to CTY; this should include procuring a general “site” EpiPen® if possible to be administered by the site nurse in case of a reaction.

**Food Allergy/Dietary Restriction Management Practices at all CTY sites:**
Families can expect all of the following to be the case at all CTY sites barring any unusual circumstances. Please note that these items may operate differently from site to site. For example, some sites have dining hall staff that is far more accessible than others (and this can vary from year to year at the same site).

- Have dining hall staff/managers available on opening day (and ready) to answer parent/guardian and student questions about food preparation and ingredients. CTY staff is typically involved in these conversations at some point so we are in the loop about what is being communicated, can assist students in navigating the cafeteria, and can also be more aware about what the site is able to do for individual students with dietary restrictions.
- Have dining hall staff available and easily identifiable/approachable during meal times so students and/or CTY staff are able to ask about ingredients of foods without labels.
- Allow and encourage students to carry an epinephrine auto-injector at all times.
- Train all staff on use of epinephrine auto-injectors (primarily EpiPens).
• Ensure staff are aware of and have chance to ask questions about students’ Allergy Action Plan (if applicable).

* Some sites have additional food allergy management practices. For example, the Lancaster, PA (7-10th grade) site is typically “nut sensitive” which means no nut products are served in the dining hall, all staff and students are requested to not bring nuts or nut products to the site, CTY staff monitors student purchases at the bookstore and local market for any nut products, and CTY staff explain the importance of not having nut products during students’ first hall meeting and take any nut products students turn over to them at this meeting. If you have questions about any additional universal design elements of a given site in relation to food allergies, please contact the site’s program manager or CTY Disability Services.

**Requesting Accommodations for Food Allergies**

If your child requires more precautions to be taken during the program than those indicated in the previous section, know that severe food allergies can qualify a CTY student for reasonable accommodations during our summer programs. To request accommodations, you will need to contact CTY Disability Services at cty-disabilities@jhu.edu or 410-735-6215, complete Request for Accommodations form, and submit documentation that supports your request. The Request for Accommodations form and documentation guidelines can be found at: [http://cty.jhu.edu/disability/accommodations/summer.html](http://cty.jhu.edu/disability/accommodations/summer.html)

Be aware that from year to year and site to site, the ability of the different host campuses’ dining services to provide particular accommodations/supports can vary. Parent and student patience and willingness to speak with full-time CTY staff before each summer, even if the student is returning to the same site, is greatly appreciated for this reason. Please also be aware that different sites have different arrangements with each hosts’ dining services, so while at one site you may have been able to work directly with a dining services staff member, this may not be possible at a different site.

**Why might an allergy be considered a “disability”?**

The label of “disability” can have negative connotation, but the label is used in regards to allergies that may qualify for special accommodations under the American with Disabilities Act Amendments Act (ADAAA) recently put into practice. With the passing of ADAAA a few key supreme course cases were reversed that previously were go-to case law in deciding cases involving food allergies as disability. The cases narrowly defined a disability and particularly the idea of an allergy “substantially limiting” major life activity. With the ADAAA, this has been expanded and courts have been directed that even if a condition is treated by mitigating measures (such as an asthma inhaler), the condition still qualifies an individual as an individual with disability under the law if a major life activity is affected at essentially any time. Thus, with a food allergy that could result in anaphylaxis, the major life activity of breathing can be affected during a reaction. This means that, by law (the ADA/ADAAA), an individual with a severe food allergy can be entitled to reasonable accommodations. While it seems the “disability” label is a negative one, in the world of disability services it is one that gives individuals with potentially life-threatening allergies the opportunity for the reasonable accommodations needed to support their medical safety so that they can participate in programs. Without this label, individuals with food allergies are not entitled to any accommodations (whether this be to the environment, menu, food preparation, policies) at CTY, school, the workplace, college, etc.

**Common Accommodations and Supports Requested for Students with Allergies**

Some students with allergies or other medical dietary restrictions request accommodations and/or supports to remain safe and to receive assistance in managing their allergies during the program in order to be able to fully participate.

Please be aware that anything that is above and beyond what is listed in the previous section does constitute an accommodations request and should be requested through CTY Disability Services.
Below is a list of some accommodations/supports that students have received in the past.

For any accommodation to be granted, documentation may be requested if this is something the particular site does routinely provide. This documentation must specifically address the accommodation requested and why the accommodation requested is medically necessary for the student to remain safe. Please also be aware that host institutions can vary greatly in the ability to provide the accommodations as described. Any questions you can have can be discussed with CTY Disability Services, and CTY Disability Services, in conjunction with Johns Hopkins Disability Officer, will ultimately decide what accommodations are granted. Documentation guidelines can be found at: http://cty.jhu.edu/disability/documentation/

Here are some examples of accommodations that may be able to be granted for students with food allergies (each accommodation requested is considered on a case-by-case basis):

- A single room to help in keeping the student’s living space free from possible allergens a roommate may unknowingly bring in.
- Contacting the roommate(s) of student with an allergy prior to the start of the program to notify them of the student’ allergy and request compliance with not bringing the allergen into room and requesting the roommate will wash hands appropriately if s/he comes into contact with allergen. Then, work to ensure CTY staff check in with the roommate and the student with an allergy regularly to make sure these things are happening. (CTY makes this contact for the family of the student with an allergy.) (Note: Not all students at CTY will have a roommate, if you feel that it is really important for your child to have a roommate, please advise CTY staff of this).
- Implement a policy that restricts certain foods from the student’s environment. This might involve: posting signs in the student dorm, hall restroom, classroom, etc. that alert people that there is an individual with a severe allergy sharing that space and to refrain from eating a particular food item; sending a letter out to parents/staff informing them that the food item is restricted on the site; reminding staff and students about this policy regularly and having a policy in place for handling situations where the restriction is violated.
- Create an “allergen sensitive” table or zone in the dining hall. (This would likely involve: ensuring table is cleaned properly before the student with an allergy sits there to eat; allowing the student to use a placement to eat there; monitoring the food items others bring to eat at the table).
- Put hand-washing policies into place (*recognizing hand sanitizer is not sufficient) particularly after meals are eaten and before shared supplies are used.
- Arranging for a hall and/or class meeting to discuss a student’s allergy and how everyone can help create a safe and supportive environment for the student.
- Direct contact with the host institution’s dining services to gather further information on their practices in regards to cross contamination, information about ingredients of items offered on the menu, etc. (Note: This is not always possible at every site depending on how the dining arrangements are made. At some sites, this communication may need to go through the site program manager).
- Permission to bring/store “safe foods” in the student’s dorm room (including bringing a refrigerator) or the site health office refrigerator (Note: These foods often cannot be taken into the dining hall due to host food services policies and food safety laws and/or guidelines they are required to meet.)
- Permission to bring/store “safe foods” in the site dining hall (Note: Due to host food service policies and food safety laws/guidelines which they are required to meet, this is not always possible.)
- Working with the host institution to create an alternate dining arrangement for a student if outside food cannot be brought in (For example, designate another room that is comparable to the dining hall in that it is indoors, air conditioned, etc. as an allergen-free dining area that a student with an allergy (and any friends) can eat food from home in safely. Ensure a plan for staff supervision is established in this area.)
- At some sites in the past, separate meals are able to be prepared. This can vary from year to year and site to site though.