

ALLERGEN AND GLUTEN AWARE PROGRAM

The Elior North America Allergen and Gluten Aware Program has been reviewed and approved by the food allergy expert team at MenuTrinfo®, LLC.

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INTRODUCTION

At Elior North America, we care about the people we serve each day. We are committed to ensuring that the food we serve is safe and is made with integrity.

To ensure our guests receive safe, quality meals, it is critically important that our team members follow the Elior North America Allergen and Gluten Aware Protocols set forth in this manual.

This manual provides our team members the guidance to:

- Execute an effective training program for food service team members
- Communicate with team members, individuals, family/caregivers, health and wellness personnel, counselors and others who may be involved in the care of the individual with food allergen needs
- Implement back-of-the-house purchasing and production procedures
- Implement front-of-the-house service, including requests to be served items normally self-served
- Introduce allergen and gluten terminology
- Identify and mitigate risk of allergen cross-contact
- Implement allergen identification through ingredient listings, labeling, digital or printed menu availability
- Implement use of standardized recipes

Thank you for your engagement and advocacy as we partner to serve our guests safe food at each and every meal.

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QUICK REFERENCE: CORE POINTS OF AN ALLERGEN AND GLUTEN AWARE PROGRAM

IMPLEMENT A SUCCESSFUL ALLERGEN AND GLUTEN AWARE PROGRAM BY ADHERING TO THE CRITERIA OUTLINED BELOW. Please reference the policy number or page number for more information.

	TOPIC	EXPECTATION
KNOWLEDGE	**Site Managers/ Supervisory Level Positions/ Person-in-Charge Training** Policy 1.1, pg. 19	• Completion of an ANAB (ANSI National Accreditation Board) course within 30 days of hire or as required by applicable health code. • Courses include ServSafe Allergen or AllerTrain as assigned by segment. • Maintain certification of such courses. • Complete Elior North America SAFE Allergen Training.
	All Team Members Policy 1.1, pg. 19	Initial Training • Successfully complete the Basic Food Safety and Allergen Training and on-site Allergen Awareness Training. • For all sites where allergen training is mandated by our client, contract, or where we are serving guest with known allergies (or where it is likely guest with food allergies may be served), Allergen Awareness Training should be completed prior to commencing service. • Complete the required annual business unit and/or facility allergen training as required.
	Job Change Training Policy 1.1, pg. 19	In the event the food production personnel or service personnel assigned to the allergen and gluten aware preparation areas are changed during the year, implement the following training protocols: • Initial Training: Initial orientation Food Safety and Allergy Training, Elior SAFE Allergen Training and completion of an approved ANAB training prior to change in position. • Menu and Allergen/Gluten Specific Diet Training: Review of individual diet plans, recipes, and procedures for food preparation and service according to the site.
ALLERGY AWARENESS	**Understanding an Individual's Allergen and Gluten Sensitivity** Pg. 9, 11, 12 & 13	Team members shall be aware of the following in relation to: • Allergies: o That an individual's allergen sensitivity can change at any time. o There is no cure for food allergies, instead strict avoidance of the food allergen is the only way to prevent an allergic reaction. o That a severe food allergy reaction may cause death if not treated immediately. • Celiac Disease (Gluten): o For an individual with celiac disease, the only treatment is a gluten-free diet. o That exposure to gluten causes damage to the small intestine, which may result in various symptoms. • Gluten Sensitivity: o The individual's with gluten sensitivity may have the same symptoms as individuals with celiac. Exposure to gluten may not cause long term harm to the body.

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	TOPIC	EXPECTATION
ALLERGY AWARENESS	**Allergen and Gluten Symbols** Pg. 10	Team members must be able to recognize the "major food allergen" symbols. Any changes to the "major food allergens" must be communicated through education and training.
	Comprehension of Allergen and Gluten Terminology Pg. 13	Team members must understand allergen and gluten/celiac terminology to be effective in the implementation and management of allergen and gluten aware procedures.
	Recognition of Allergen and Gluten Terms Utilized in Evaluating Ingredient Labels Pg. 70–74	Team members will recognize allergen and gluten terminology utilized in evaluating ingredient labels. (A reminder that there may be additions or changes of terminology and if questions check with the site manager/person-in-charge or Go-To team member.)
	Completion of Allergen and Gluten Aware Site Audit Pg. 14–16	Each site manager and/or person-in-charge will complete the Allergen and Gluten Aware pre- and post-audit when determining the capability of the unit to provide allergen and gluten aware meals. The post audit will be verified by the District Manager and retained on file.
COMMUNICATION	**Go-To Team Member** Policy 1.3, pg. 21	• Identify a Go-To team member for each shift. This individual will be a supervisor, assistant supervisor, chef or individual in a supervisory capacity. • Ensure individual completes training as outlined. • Develop procedures to maintain communication with Go-To team members on each shift that will include information on any menu, recipes, or ingredient substitutions.
	Menus Policy 1.10, pg. 28	Units with allergen and gluten programs will have menus, ingredients, and recipes available to guests.
	Marketing Policy 1.18, pg. 38–39	Sites should always post the Food Allergy and Allergen Disclaimer poster at prominent locations throughout the service areas. Reference the policy for more information regarding labeling and menu management systems. Posters can be ordered.
	Guest/Client Policy 1.19, pg. 40	Establish communication with guest/client specific to each type of business. Ensure Go-To team members communicate any substitutions to the guests/clients.
FLOW OF FOOD	**Receiving** Policy 1.6, pg. 24	When receiving food deliveries, team members must be trained to check the deliveries for ordered items, labels, and substitutions.
	Storage Policy 1.6, pg. 24	Adhere to individual unit storage guidelines to prevent cross-contact. • Store allergen and gluten free products in a designated area. • If there is no designated area, label and store on top shelf above allergen and gluten containing products.
	Food Preparation Policy 1.13, pg. 33	Team members must follow guidelines to avoid cross-contact when cooking allergen and gluten aware foods. • Ensure that proper ingredients are used in recipes. • Use proper food preparation and hygiene procedures to prevent cross-contact. • Use designated equipment, serviceware, and utensils to prevent cross-contact. • Establish time and location allergen and gluten aware foods will be prepared.

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	TOPIC	EXPECTATION
FLOW OF FOOD	**Holding Foods** Policy 1.13, pg. 33	Keep allergen and gluten aware foods covered. Ensure they do not touch any other food items, beverages, utensils, equipment, gloves, or surfaces.
	Service Policy 1.14, pg. 34	Team members must follow guidelines to avoid cross-contact when serving allergen and gluten aware foods. • Verify menu items with the chef on duty. Review any substitutions in pre-huddle service. • Ensure all service areas are cleaned and sanitized prior to placing food on serving lines. • Use designated equipment and serviceware. • Thoroughly wash hands and follow hygiene guidelines to prevent cross-contact.
HYGIENE AND SANITATION	**Allergen Hygiene** Policy 1.7, pg. 25	Team members preparing food for individuals with allergies, celiac disease, or gluten sensitivity must be aware and adhere to the appropriate allergen and gluten hygiene practices. • Team members must change gloves, aprons, and hair and beard covers prior to preparing allergen and gluten aware foods. • To prevent the transfer of allergen proteins, team members must wash hands and change aprons, gloves, and hair and beard covers when going from one preparation of one food to another. • Team members shall wash hands and exposed portion of arms according to the Elior North America handwashing policy.
	Allergen Cleaning and Sanitizing Policy 1.8, pg. 26	Cross-contact of allergens and gluten is minimized through effective cleaning and sanitizing. • Using cleaning solutions, cloths, and buckets, wash, rinse and sanitize according to the standard cleaning and sanitizing policy. • Note: Sanitizer does not remove allergen proteins from hands or surfaces.
FOLLOW-UP	**Communication** Policy 1.18, pg. 38–39	• Team must take proper measures to ensure that we have an open line of communication with our client/guest regarding allergen and gluten information. • Ensure allergen and gluten signage is properly displayed at the site. • Ensure Go-To team member is prepared to have a conversation about the menu with guests/clients. • Review posted menu and allergen and gluten information for accuracy. • Label packaged foods as required.

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ALLERGEN AND GLUTEN AWARE PROGRAM

It is important that we partner with our clients and guests to establish protocols for the prevention of an allergic reaction or accidental gluten exposure. The increase in food allergies and celiac disease among children and adults in the United States has become a concern for anyone serving food. It is estimated that 32 million individuals and 1 in 13 children (or approximately 8% of children) have food allergies. The prevalence of celiac disease in Americans is around 1% or 1 in 133 people. There is no current cure for food allergies, instead strict avoidance of the food allergen is the only way to prevent an allergic reaction. Strict avoidance of gluten is the only way to manage celiac disease, as there is no cure.

The FDA Food Code developed by the US Food and Drug Administration provides a uniform system of provisions that address food safety and protection offered at retail and food service operations. The provisions outline the requirements managers and staff must be able to adhere to regarding food allergens. The FDA Food Safety Modernization Act (FSMA), introduced in 2011, was implemented to improve food safety in the United States. As a part of the FSMA Act, the Center for Disease Control and Prevention of the US Department of Health and Human Services in consultation with the U.S. Department of Education, developed the Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs.

Section 2-201.11 states the certified manager or person-in-charge must be able to:

> *"Describe foods identified as major food allergens and the symptoms that a major food allergen could cause in a sensitive individual who has an allergic reaction" and "the person-in-charge ensures that team members are properly trained in food safety, including food allergy awareness, as it relates to their assigned duties." Section 2-103.11*

The Allergen and Gluten Aware Program is intended to comply with the requirements of the FDA Food Code. As members of our Elior North America team, it is critical that we recognize that our food and the way we store, prepare and serve it, can significantly impact the health and well-being of our guests. This manual is provided to set forth guidelines for serving safe food.

The FDA Food Code is clear that at each of our sites, the site manager or person-in-charge must be able to:

- Describe foods identified as major allergens
- Describe the symptoms a major food allergen could cause in individuals with allergic reactions
- Ensure team members are properly trained in food safety including allergy awareness

FDA Food Code Sections 2-201.11, 2-103.11

Gluten Identification

The Food and Drug Administration (FDA) does not require gluten to be labeled in the same fashion as allergens but has regulations for manufacturers regarding the voluntary claim of gluten-free labeling of packaged food products—put in place in 2014. The FDA defines the claims of gluten-free, no gluten, free of gluten or without gluten to mean the food item contains less than 20 parts per million (PPM) of gluten, a standard criteria used internationally.

In addition, foods that are inherently gluten free, such as fruits and vegetables, can be labeled gluten-free as long as the item has not had cross-contact with more than 20 PPM of gluten.

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TOP 9 MAJOR FOOD ALLERGENS AND GLUTEN SYMBOLS

The nine food allergens listed below are designated as "major food allergens." These foods cause an estimated 90% of food allergic reactions and are the food sources from which many other ingredients are derived. We have also identified our standard gluten symbol.

The Elior North American Top 9 Allergens and gluten symbol are identified below. See pending legislation references listed below regarding the sesame allergen and reference pages at the end of the manual regarding sesame education, etc.



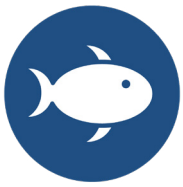
Eggs



Milk



Crustacean Shellfish



Fish



Peanuts



Tree Nuts



Wheat



Soy



Sesame



Gluten

Sesame Allergen. Sesame was declared as the 9th major food allergen to be recognized by the United States. The FASTER Act (Food, Allergy Safety, Treatment, Education, and Research) was signed into law on April 23, 2021. The labeling of sesame as an allergen will not be required until January 1, 2023. Please be aware of the changes that will be taking place as you begin to see information regarding sesame labeling as an allergen from manufacturer's and other sources. Reference the education pages from FARE located at the back of the manual for more information.

FARE (Food Allergy Research & Education): FARE now lists nine food allergens that cause the majority of allergen food reactions. For more information, visit: https://www.foodallergy.org/living-food-allergies/food-allergy-essentials/common-allergens/sesame

Allergy & Asthma Network: Sesame Allergy and Food Labels: For more information, visit: https://allergyasthmanetwork.org/news/sesame-the-9th-food-allergen/

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FOOD ALLERGEN REACTION – SIGNS AND SYMPTOMS

Food allergen reactions will usually occur where an individual lives and/or dines. Trace amounts of food can cause a reaction and some individuals may have a reaction simply from coming into contact with or breathing in a food protein. Our teams must be able to identify symptoms of an allergic reaction and implement the Emergency Response Plan identified at each site.

Signs and symptoms. Symptoms vary from individual to individual and from allergic reaction to allergic reaction. FARE (Food Allergy and Research Education) lists both mild and severe symptoms.

- **Mild symptoms** may include more than one of the following: sneezing, itchy runny nose, itchy mouth, rash or hives, mild nausea or discomfort.
- **Severe symptoms (Anaphylaxis)** include hives over the body, significant swelling of the tongue and lips, trouble breathing, or swallowing; pale, faint, weak pulse, dizzy, short of breath, wheezing, repetitive cough. The use of an epinephrine auto-injector ("Epi-Pen") is the primary treatment. (Reference the Allergic Reaction: Symptoms and Response pg. 12)

Reaction time. Reaction times vary but can occur from a few minutes up to a few hours after a food is eaten. A second wave of symptoms may occur after the first symptoms go away. This is called biphasic reaction and can start two to four hours later. This may require observation for four to six hours at a hospital.

Response for a suspected allergen reaction. Our team members should ensure they understand our clients' protocol for food allergies. Make sure you have a clear understanding of what the emergency response will be once you call your designated emergency number. Any site emergency response plan should incorporate our client's allergen and anaphylaxis emergency care plans.

- Follow the site Emergency Response Plan as indicated. Ensure that all team members understand the signs and symptoms and what emergency response is required.
- Call 911 immediately.
  - Unless the Emergency Response Plan indicates differently.
- Contact the designated on-site individual for assistance.
  - If no one is available at the unit to assist, following directions inject the epinephrine auto-injector pen if available.
  - If breathing is difficult, lay the person flat and raise their legs.
  - If the individual is vomiting, let them sit up or lay on their side (Reference the following Common Symptoms of Anaphylaxis on the next page).
- Your onsite emergency response plan may need revision if onsite responders report to the scene prior to deciding to call 911 or prior to mobilizing responders who carry epinephrine.

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Allergic Reaction: Symptoms and Response

FOR A SUSPECTED OR ACTIVE FOOD ALLERGY REACTION

SEVERE SYMPTOMS

For any of the following severe symptoms:

LUNG	Shortness of breath, wheezing, repetitive coughing
HEART	Pale, blue, fainting, pulse racing/decreasing, dizzy, confused
THROAT	Tight, hoarse, trouble breathing/swallowing
MOUTH	Significant swelling of tongue or lips
SKIN	Many hives over body, widespread redness
GUT	Repetitive vomiting, severe diarrhea
OTHER MENTAL SYMPTOMS	Feeling something bad is about to happen, anxiety, confusion
COMBINATION	Of above symptoms

MILD SYMPTOMS

Or more than one mild symptom:

NOSE	Itchy/runny nose, sneezing
MOUTH	Itchy mouth
SKIN	A few hives, mild itch
GUT	Mild nausea/discomfort

1

INJECT EPINEPHRINE IMMEDIATELY

2

Call 911.

Request ambulance with epinephrine.

Consider Additional Meds

(After epinephrine):

- Antihistamine
- Inhaler (bronchodilator) if asthma

Positioning

Lay the person flat and raise legs. If breathing is difficult or they are vomiting, let them sit up or lie on their side.

Next Steps

- If symptoms do not improve, or symptoms return, more doses of epinephrine can be given about 5 minutes or more after the last dose.
- Transport to and remain in Emergency Room (ER) for at least 4 hours because symptoms may return.

Adapted from FARE

When in doubt, call 911.

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ALLERGEN AND GLUTEN TERMINOLOGY

POLICY

Team members must understand allergen and gluten terminology to be effective in the implementation and management of allergen and gluten aware procedures.

PROCEDURE

REVIEW

Allergen and gluten terminology will be reviewed during training and throughout the instruction and implementation of policies and procedures in the food service facility. Key terms are listed below to be utilized in the training process.

Allergen and gluten aware. To utilize the terms "allergen and gluten aware" on a menu or marketing material, the unit must demonstrate and have an environment that is made as safe as possible from allergens. Utilizing the the internal allergen and gluten audit sheet, the criteria must be met where applicable to ensure the unit has can accommodate individuals with allergens (gluten). The unit must be able to demonstrate such through appropriate purchasing, adherence to menus and recipes, staff training, adherence to policies and procedures, and good communication.

Americans with Disabilities Act. Federal law that prohibits discrimination of people with disabilities. Allergens are considered a disability under the ADA.

Anaphylaxis. A serious allergic reaction that is of sudden onset and can cause death.

https://www.ada.gov/ada_intro.htm

https://www.justice.gov/opa/pr/justice-department-and-lesley-university-sign-agreement-ensure-meal-plan-inclusive-students

https://www.ada.gov/rider_sa.html

Celiac Disease. A chronic disease that is caused by eating gluten. (Chronic small intestinal immune-mediated enteropathy precipitated by exposure to dietary gluten in genetically predisposed individuals [from beyondceliac.org]).

Cross-contact. The transfer of allergen proteins from one surface or food to another.

Cross-contamination. Occurs when harmful bacteria or viruses spreads to food from other food, surfaces, hands, or equipment (transfer of pathogens from one surface or food to another).

Food allergy. A medical condition in which exposure to a food triggers a harmful immune response that may cause mild to serious symptoms including death.

Food intolerance. A reaction to food that does not involve the immune system.

Gluten. A protein found in specific grains, including all forms of wheat, rye, barley and triticale.

Gluten intolerance/sensitivity. Inability to tolerate gluten, but celiac testing is negative.

Histamine. A chemical the body releases in response to an allergen.

Lactose intolerance. The body is unable to breakdown lactose, a sugar found in milk. Symptoms include nausea, gas, cramping, bloating, and diarrhea, but the condition is not life-threatening.

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ALLERGEN AND GLUTEN AWARE AUDIT PROCESS

IMPLEMENTATION

Each site manager and/or person-in-charge should ensure that allergen and gluten aware meals can be safely prepared, produced, and served at their site. The Allergen and Gluten Aware Site Audit tool is to be used as a pre- and post-audit when defining the capability of the unit to provide allergen and gluten aware meals. The audit is to be completed annually to verify processes are still in place.

STEPS

1. Prior to commencing operations and/or serving allergen and gluten aware meals, the audit should be completed.
2. Complete the site audit. (Reference the Allergen and Gluten Aware Implementation Guide for Answering Audit Questions located in the Appendix.)
3. Corrective action is outlined with date of completion and submitted to District Manager and also uploaded into SharePoint.
4. Once corrective action is completed, the District Manager and/or designee should provide verification by completing the audit tool as directed and maintain on SharePoint.
5. Implement the preparation of allergen and gluten aware meals for guests.

Note:

- If you are already serving allergen and gluten aware meals, you must complete the audit to ensure you have the policies and procedures in place that verify the unit can accommodate individuals requesting allergen and gluten aware meals.
- If you are utilizing the words Allergen and Gluten Friendly on your menu, the wording will need to be changed to Allergen and Gluten Aware. However, in order to continue to indicate you can accommodate individuals with allergies (gluten), you must complete the Allergen and Gluten Aware Site Audit, correct any areas not incompliance, have verification by your District Manager, and maintain the audit on SharePoint.

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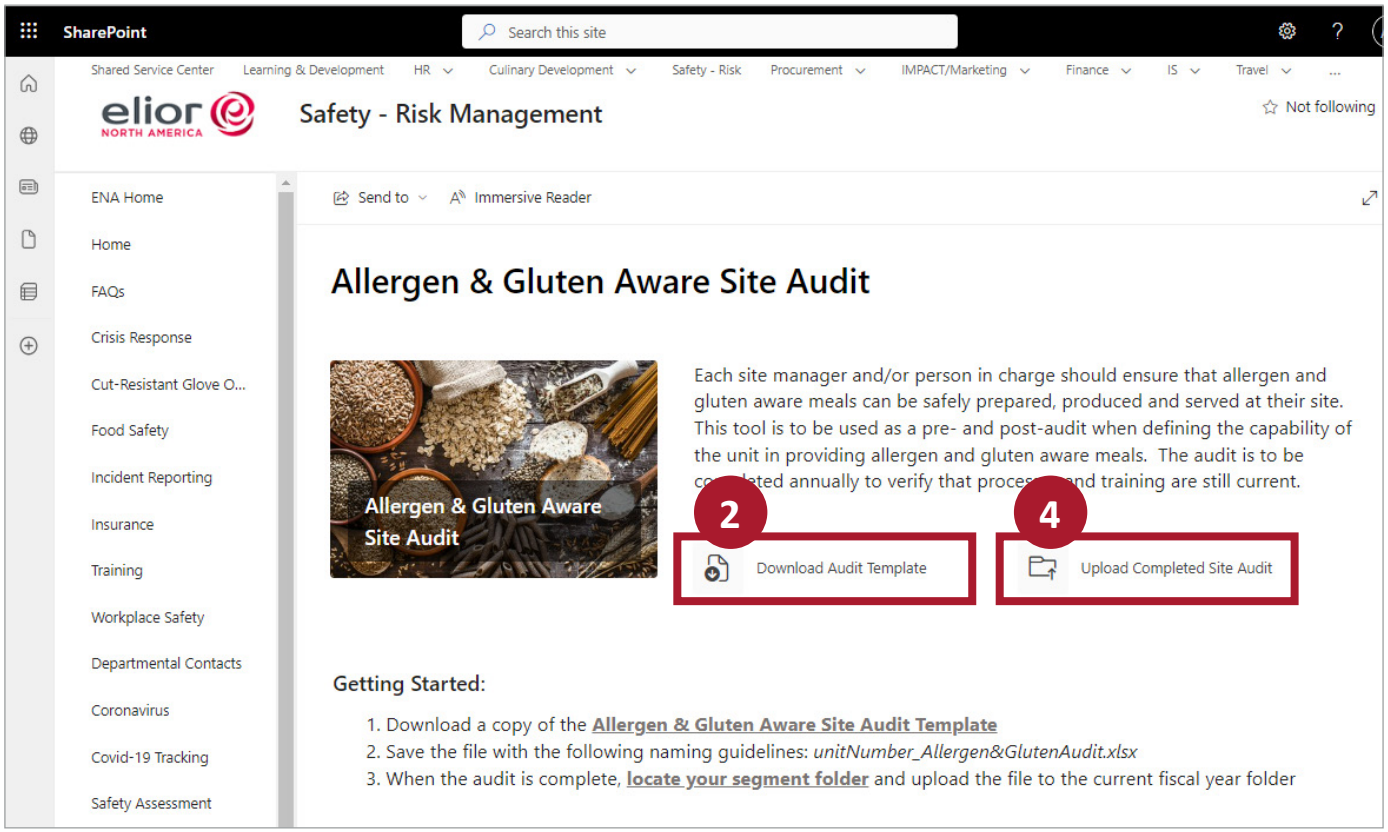
ALLERGEN AND GLUTEN AWARE SITE AUDIT

Each site manager and/or person-in-charge should ensure that allergen and gluten aware meals can be safely prepared, produced and served at their site. This tool is to be used as a pre- and post-audit when defining the capability of the unit in providing allergen and gluten aware meals. The audit is to be completed annually to verify that processes and training are still current.

GETTING STARTED

1. Access the Allergen & Gluten Aware Site Audit SharePoint page for audit resources
2. Download a copy of the Allergen & Gluten Aware Site Audit Template
3. Save the file with the following naming guidelines to your computer:
   unitNumber_Allergen&GlutenAudit.xlsx
4. When the audit is complete, **locate your segment folder** and upload the file to the current fiscal year folder

Allergen & Gluten Aware Site Audit SharePoint



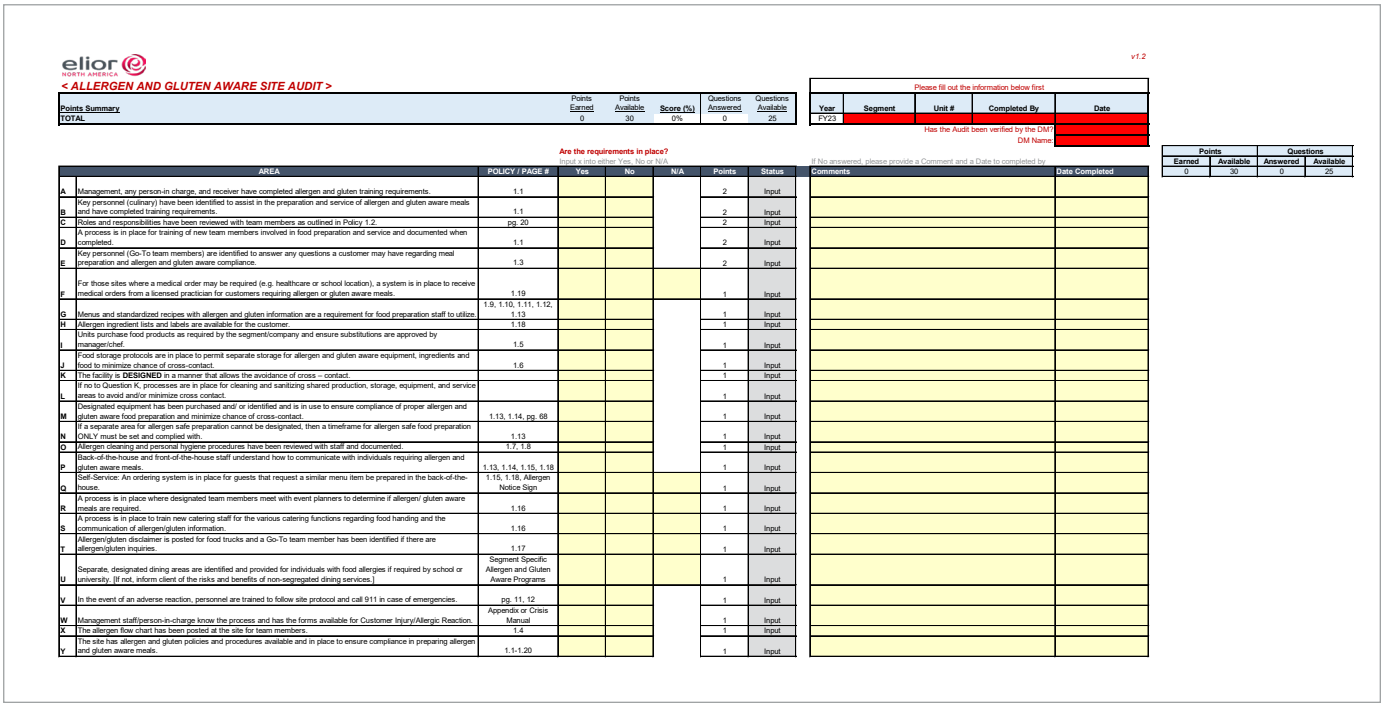
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Allergen & Gluten Aware Site Audit Template

On the Audit Sheet please mark an "x" in either the Yes, No or NA column for each question if the requirement is in place. If no, please outline the process to complete in the Comments column, and a Completed by Date.

Once the Audit Form has been dowloaded, rename the file appropriately (ie. *unitNumber_ Allergen&GlutenAudit.xlsx*).

Once completed, upload the Audit Form to the appropriate segment folder and current fiscal year on the Allergen & Gluten Aware Site Audit SharePoint page.



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< ALLERGEN AND GLUTEN AWARE SITE AUDIT >

Points Summary	Points Earned	Points Available	Score (%)	Questions Answered	Questions Available
TOTAL	0	30	0%	0	25

Please fill out the information below first

Year	Segment	Unit #	Completed By	Date
FY23				

Has the Audit been verified by the DM?

DM Name:

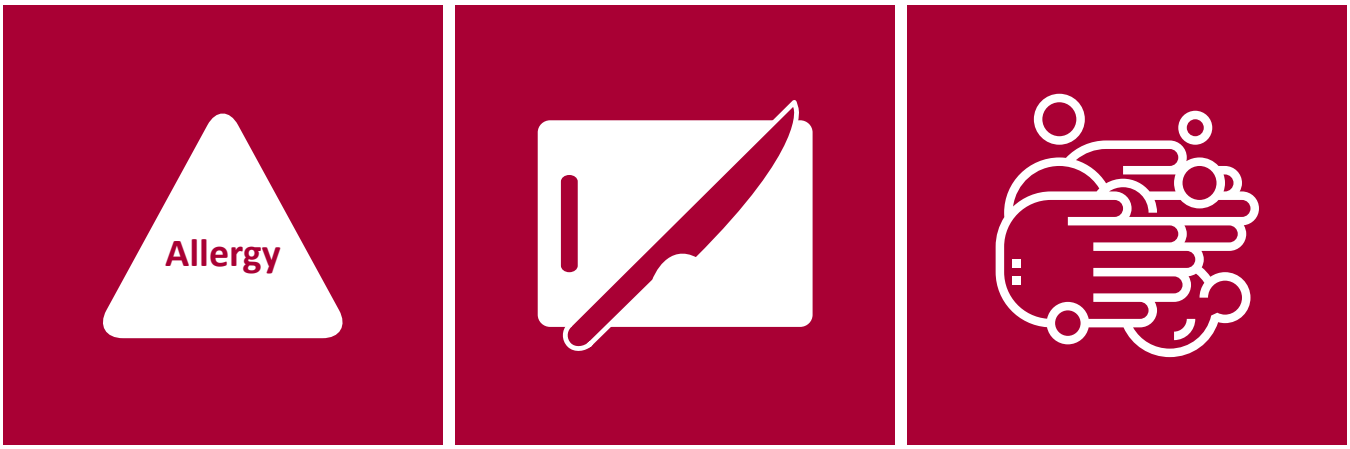
Points		Questions	
Earned	Available	Answered	Available
0	30	0	25

Are the requirements in place?
Input X into either Yes, No or N/A

If No answered, please provide a Comment and a Date to completed by

	AREA	POLICY / PAGE #	Yes	No	N/A	Points	Status	Comments	Date Completed
A	Management, any person-in charge, and receiver have completed allergen and gluten training requirements.	1.1				2	Input		
B	Key personnel (culinary) have been identified to assist in the preparation and service of allergen and gluten aware meals and have completed training requirements.	1.1				2	Input		
C	Roles and responsibilities have been reviewed with team members as outlined in Policy 1.2.	pg. 20				2	Input		
D	A process is in place for training of new team members involved in food preparation and service and documented when completed.	1.1				2	Input		
E	Key personnel (Go-To team members) are identified to answer any questions a customer may have regarding meal preparation and allergen and gluten aware compliance.	1.3				2	Input		
F	For those sites where a medical order may be required (e.g. healthcare or school location), a system is in place to receive medical orders from a licensed practician for customers requiring allergen or gluten aware meals.	1.19				1	Input		
G	Menus and standardized recipes with allergen and gluten information are a requirement for food preparation staff to utilize.	1.9, 1.10, 1.11, 1.12, 1.13				1	Input		
H	Allergen ingredient lists and labels are available for the customer.	1.18				1	Input		
I	Units purchase food products as required by the segment/company and ensure substitutions are approved by manager/chef.	1.5				1	Input		
J	Food storage protocols are in place to permit separate storage for allergen and gluten aware equipment, ingredients and food to minimize chance of cross-contact.	1.6				1	Input		
K	The facility is **DESIGNED** in a manner that allows the avoidance of cross – contact.					1	Input		
L	If no to Question K, processes are in place for cleaning and sanitizing shared production, storage, equipment, and service areas to avoid and/or minimize cross contact.					1	Input		
M	Designated equipment has been purchased and/ or identified and is in use to ensure compliance of proper allergen and gluten aware food preparation and minimize chance of cross-contact.	1.13, 1.14, pg. 68				1	Input		
N	If a separate area for allergen safe preparation cannot be designated, then a timeframe for allergen safe food preparation ONLY must be set and compled with.	1.13				1	Input		
O	Allergen cleaning and personal hygiene procedures have been reviewed with staff and documented.	1.7, 1.8				1	Input		
P	Back-of-the-house and front-of-the-house staff understand how to communicate with individuals requiring allergen and gluten aware meals.	1.13, 1.14, 1.15, 1.18				1	Input		
Q	Self-Service: An ordering system is in place for guests that request a similar menu item be prepared in the back-of-the-house.	1.15, 1.18, Allergen Notice Sign				1	Input		
R	A process is in place where designated team members meet with event planners to determine if allergen/ gluten aware meals are required.	1.16				1	Input		
S	A process is in place to train new catering staff for the various catering functions regarding food handing and the communication of allergen/gluten information.	1.16				1	Input		
T	Allergen/gluten disclaimer is posted for food trucks and a Go-To team member has been identified if there are allergen/gluten inquiries.	1.17				1	Input		
U	Separate, designated dining areas are identified and provided for individuals with food allergies if required by school or university. [If not, inform client of the risks and benefits of non-segregated dining services.]	Segment Specific Allergen and Gluten Aware Programs				1	Input		
V	In the event of an adverse reaction, personnel are trained to follow site protocol and call 911 in case of emergencies.	pg. 11, 12				1	Input		
W	Management staff/person-in-charge know the process and has the forms available for Customer Injury/Allergic Reaction.	Appendix or Crisis Manual				1	Input		
X	The allergen flow chart has been posted at the site for team members.	1.4				1	Input		
Y	The site has allergen and gluten policies and procedures available and in place to ensure compliance in preparing allergen and gluten aware meals.	1.1-1.20				1	Input		

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POLICIES

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1.3 IDENTIFICATION OF GO-TO TEAM MEMBER
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POLICIES CONTINUED...

1.13 BACK-OF-THE-HOUSE: PREPARING AND COOKING ALLERGEN & GLUTEN AWARE FOODS

1.14 FRONT-OF-THE-HOUSE: SERVING ALLERGEN & GLUTEN AWARE FOODS

1.15 FRONT-OF-THE-HOUSE: SELF-SERVICE AREAS

1.16 CATERING

1.17 FOOD TRUCKS

1.18 COMMUNICATING ALLERGENS TO GUESTS

1.19 ALLERGEN AND GLUTEN AWARE ORDER COMMUNICATION

1.20 ALLERGEN COMMUNICATION FLOW CHART

1.1 TRAINING

POLICY

For all sites where allergen and/or gluten training is mandated by our client, contract or where it is likely guests with food allergies may be served, team members must complete mandatory allergen and/or gluten training and maintain certifications necessary to successfully and safely perform their job duties.

PROCEDURE

TRAIN

Managers. All team members assigned to supervisory-level positions that require a food safety manager certification (e.g. district managers, director of operations, general managers, location supervisors, production managers, chefs, assistant managers or person-in-charge) must complete the following steps:

- **Allergen Certification Course.** Successfully complete an approved American National Standards Institute (ANAB) food safety allergen certification course, such as ServSafe Allergen or AllerTrain within 30 days of hire (or sooner if required by applicable health code).
- **Exam and Certification.** Maintain a current certification for the duration of employment.

All Team Members. All team members must complete the following steps:

- **Initial Training.** Successfully complete the Basic Food Safety Training and on-site Allergen Awareness Program. For all sites where allergen training is mandated by our client, contract or where we are serving guests with known allergies (or where it is likely guests with food allergies may be served), Allergen Awareness Training should be completed prior to commencing service.
- **Annual Training.** Complete the required annual business unit and/or facility allergen training as may be required.

Food Preparation and Job Change Position Training

- **Job Change Training.** In the event the food production personnel or service personnel assigned to the allergen and gluten aware food preparation are changed during the year, the following training protocols must be implemented:
    - Initial Training: Initial Orientation Food Safety and Allergen Training, Elior SAFE Allergen Training and completion of an approved ANAB training prior to change in job position.
    - Menu and Allergen/Gluten Specific Diet Training: Review of individual diet plans, recipes and procedures for food preparation and service according to the site.

RECORD

All training should be documented and maintained according to business unit requirements. For instructions on your specific business unit requirements, contact your District Manager. When customers are present in service area, then training certifications are posted where visible to guests (where feasible).

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1.2 ROLES AND RESPONSIBILITIES

POLICY

Each team member should be aware of and understand their responsibilities as they relate to food allergies and to sourcing, receiving, storing, preparing, cooking, serving, cleaning, personal hygiene and communication.

PROCEDURE

Although it may vary by site, in general the following positions should understand and complete the following responsibilities:

POSITION	RESPONSIBILITIES
Back-of-the-House Team Members (including, without limitation, chefs, cooks, team members involved in receiving, storing, preparing, cooking and cleaning)	• Follow standardized recipes. • Communicate recipe changes or ingredient substitutions to front-of-the-house service team prior to service. • Follow the procedures set forth in the Allergen and Gluten Aware Program and the Food Safety Manual to minimize the risk of cross-contact and cross-contamination.
Front-of-the-House Team Members (including, without limitation, servers, expediters and any other team member who may be asked about food allergens or ingredients)	• Follow procedures to accurately communicate allergen and gluten information to guests. • Ensure proper signage is posted and ingredient lists (with allergens) are available upon request. • Know who the Go-To team member is. • Attend all pre-service huddles where menu changes may be discussed.
Site Managers/ Person-in-Charge (operational teams)	• Have a folder, system, tool or process on site, where the Front-of-the-House and Back-of-the-House team can access recipes and any ingredient changes. • Establish systems for allergen containing substitutions and vendor/receiver communication. • Consider having (or adding to existing) pre-service huddles where important topics (like recipe changes) are discussed. • Ensure colleagues are trained and updated on allergen procedures (maintain records of the training). • Complete ANAB approved allergen training if you are at a site where allergen and gluten aware meals are required. • After dialing 911 and ensuring individual is safe, contact the Crisis Hotline (1.844.627.1339) or Response Team (responseteam@elior-na.com) if any guest or team member experiences a severe allergen incident.
Go-To Team Member	• In addition to the above requirements, understand recipes and ingredients (and changes thereto). • Consult culinary team regarding substitutions and cross-contact. • Discuss allergen and gluten needs with guests. • For each guest with an allergy, compare the identified allergen against the ingredient labels on the original packaging.
Receivers	• Receive allergen training. • Communicate ingredient substitutions to chef. • Follow the procedures set forth in the Allergen and Gluten Aware Program and the Food Safety Manual to minimize the risk of cross-contact and cross-contamination.

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1.3 IDENTIFICATION OF GO-TO TEAM MEMBER

POLICY

Each site should have a designated Go-To team member. This is the individual assigned to answer guests' questions about allergen and gluten aware menu offerings.

PROCEDURE

IDENTIFICATION

Identify the Go-To Team Member. Identify an individual for all hours of operation. Typically, this individual will be a supervisor, assistant supervisor or chef.

Training. Have the Go-To team member complete the ServSafe Allergen or AllerTrain courses and comply with all other training requirements.

Keep Informed. Ensure this individual communicates with management, chef, and/or production team to identify menu substitutions and key ingredient changes prior to service and is able to address the same with guests.

Communicate (After Double-Checking). Ensure your team is trained to refer any guest with allergen or gluten questions to the Go-To team member. The Go-To team member must double-check all ingredients and menu items before responding to any guest inquiries. If unsure of any answer, the Go-To team member needs to tell the guest that we could not validate that the requested menu item is allergen or gluten aware.

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1.4 ALLERGEN FLOW CHART

1 Training

Manager and/or Person-in-Charge Must Complete an Approved ANAB Training.
Team Members must complete Elior SAFE Allergen Training annually. (Reference Policy 1.1)

2 Create the Menu

Use approved ingredients and recipes from the menu management system or that have been approved by the segment's culinary or wellness team.

- Ordering (with a menu management system): Generate purchase orders using approved menu management ordering system.
- Ordering (without a menu management system): Generate purchase orders adhering to the standardized recipes.

3 Delivery

Ensure ingredients delivered are the same as those ordered.
Ensure substituted products are identified. Chef or production manager must approve substitution prior to their use. Check that deliveries have not been damaged, cross-contact has not occurred. Reject as appropriate.

4 Storage

Store food in accordance with Food Safety Guidelines.
Separate allergen-free and gluten-free foods from standard foods.

5 Production

All recipes must be approved and followed.
No additional garnishes, sauces/drizzles, or undisclosed ingredients should be used. All product substitutions should be identified. Follow proper protocol to avoid cross-contact.

6 Staff Communication

Prior to service, ensure staff is aware of ingredients and menu items.
Ensure the identified individual responsible for communicating to guests about allergens is aware of any substitutions. Site Managers, Person-in-Charge or Go-To team member should ensure that correct allergens and products are verified.

7 Service

Ensure appropriate signage is displayed.
Minimize cross-contact during service. Comply with procedures for special request foods. Ensure the team knows how to reach Go-To team member.
Only give accurate allergen and gluten advice.
NEVER GUESS

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1.5 PROCUREMENT: ORDERING FOOD & SUPPLIES

POLICY

Correct allergen information must be available for those purchasing ingredients or products to be utilized in preparation of food offerings for customers.

PROCEDURE

PROCUREMENT

Procurement and purchasing are essential in partnering with suppliers to ensure that accurate ingredients and allergen statements are available to the sites.

Vendors.

- Procurement will require that vendors have the ingredients, sub-ingredients, and allergen/gluten information for food products that will be purchased by sites.
- Procurement will ensure the availability of proper equipment and serviceware designed to help minimize allergen cross-contact.
- Procurement will send weekly notifications of order guide changes to menu management teams.
- Procurement category managers are dependent on manufacturers to notify them of ingredient and/or allergen changes for existing products. When Elior North America procurement is notified of a change in ingredients and/or allergens, they communicate with the menu management teams through the monthly contract release process. As part of the notification, procurement will make available the ingredients, sub-ingredients and allergen/gluten information from the manufacturers to the menu management teams and sites.
- If an ingredient change is identified at a site level, the unit will notify their menu management team so the change can be broadly shared.
- Where possible, vendors will adhere to company/facility policy regarding substitutions. If substitutions are made, the facility location manager or supervisor must be notified by vendor and/or individual receiving products with appropriate ingredient and allergen information, which will be communicated to the production staff.
- All substitutions must be labeled upon receipt and approved by the chef or production manager prior to being used.
- Before serving an ingredient to an individual who has an allergy or gluten intolerance, the site will always verify the ingredients.

Notation: USDA Commodities and/or Opportunity Buying. In the event USDA commodities or Opportunity Buying products are utilized by a unit, it is the site supervisor's responsibility to ensure the allergen notifications to recipes and menu items are communicated to the staff and allergen Go-To team member, and the correct menu items and ingredients are available to the clients. If it is a permanent change, it should be communicated to the menu management team.

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1.6 RECEIVING AND STORAGE

POLICY

When receiving food deliveries, team members must be trained to check the deliveries for ordered items, labels, damaged items and substitutions.

PROCEDURE

RECEIVING

Individuals receiving food and beverage products are essential in preventing cross-contact, identifying substituted products, and storing food items appropriately.

Inspect Deliveries.

- Assign and train specific team members to inspect and receive deliveries. Coordinate delivery times with vendors/suppliers to ensure that deliveries are made when assigned team members can check-in the products.
- Inspect the delivery truck when it arrives to ensure that it is clean, free of rotten odors and organized to prevent cross-contamination (e.g. no meat on top of produce) and cross-contact from allergens and gluten (e.g. broken bag of flour contaminating other products).
- Visually inspect and randomly check food items to ensure they are free from signs of spoilage or any large ice crystals.
- Place damaged items in properly identified areas and report to management.
- If a damaged item has broken in the truck, ensure there is no cross-contact with non-allergenic products. If cross-contact has occurred, report to management for return.

Segregation.

- Store allergen and gluten-free ingredients in a designated space if available. Where the site does not have a designated space for allergen and gluten-free ingredients, consider using tape or other markings to identify which shelves/storage areas are for allergen and gluten-free products. In such case, store products containing allergens and gluten on bottom shelves. Store allergen and gluten-free products on top shelves (or above products containing allergens or gluten) (e.g. rice above pasta).
- Consider consolidating higher risk allergen foods, such as nut oils, nuts for baking, and peanut butter, in a designated area where leaks are prevented (e.g. a bin in bake shop for all nut ingredients in operation).
- Ensure that specific cookware, tools and serviceware used for allergen and gluten-free cooking and service are separately stored from that used for standard service.

Alert.

Identify any different products or substitutions and report to person-in-charge to ensure ingredients, sub-ingredients and allergen and gluten-free products are the same. If different, an Allergen and Gluten Alert poster (see page pg. 60) will need to be immediately put into effect for production staff, front-of-the-house staff, and customers.

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1.7 ALLERGEN AND GLUTEN HYGIENE

POLICY

Team members preparing food for individuals food with allergies or gluten sensitivity must be aware and adhere to the appropriate allergen and gluten hygiene practices.

PROCEDURE

HYGIENE PRACTICES

When preparing allergen and gluten aware foods, team members must take the necessary precautions to prevent cross-contact.

- Team members must change gloves, aprons, and hair and beard covers prior to preparing allergen and gluten aware foods or when preparing different allergen and gluten aware foods (e.g. change gloves between preparing a gluten-free ham and cheese sandwich for a gluten aware customer and a chicken fillet sandwich for a milk allergic customer).
- When going from the preparation of one food to another, team members shall wash hands following proper hand washing procedures to prevent the transfer of allergen proteins. Wash hands prior to donning fresh gloves.
- Team members shall wash hands and exposed portions of arms in accordance with the Elior North America handwashing policy.

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1.8 ALLERGEN AND GLUTEN CLEANING & SANITIZING

POLICY

Cross-contact of allergens and gluten is minimized through effective cleaning and sanitizing.

PROCEDURE

CLEANING AND SANITIZING

Allergen and gluten cleaning and sanitizing procedures will be followed when preparing allergen and gluten aware foods for customers.

Wash, rinse, and sanitize in the following order utilizing **clean** water, cloths or single-use towels, and rinsing and sanitizing agents. ***Note: Sanitizer does not remove allergen proteins from hands or surfaces. Soap and water is required to remove allergen proteins from hands and surfaces.***

1. Remove food particles from the surface area.
2. Wash with **clean** warm, soapy water and a **clean** cloth or single-use towel wiping down all areas.
3. Rinse: Fill a spray bottle with fresh water. Spray surfaces that have been cleaned with soapy water. Wipe with a clean single-use towel.
4. Sanitize: With single-use or clean cloths.
5. Allow surfaces to air dry.

Required: Identify designated cleaning equipment and materials for allergen and gluten specific cleaning and sanitizing.

Never share cleaning materials for tables where customers eat and locations where food is prepared and served.

GLUTEN CLEANING AND SANITIZING

(FLOURS — DRY WIPE METHOD)

1. After flour settles, dry wipe the area using a dry paper towel and dispose of paper towel.
2. Use a damp cloth to clean surface thoroughly. Gluten becomes sticky when it is wet, so using a wet cloth will only move particles around.
3. Protect utensils, serviceware, and cookware from flour residues.

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1.9 PRODUCTION: STANDARDIZED/APPROVED RECIPES

POLICY

Use standardized recipes and the correct ingredients to prevent allergen and gluten risks.

PROCEDURE

RECIPES

All units should have the availability of standardized recipes with the proper product purchasing codes.

Standardized Recipes.

- Production staff are trained to utilize the standardized recipes with the specific product purchasing codes attached.
- Production staff are required to adhere to recipes unless a variance is approved by the location supervisor. Follow substitutions procedure below if a recipe variance is approved.
- All recipes are made available to all staff (including, without limitation, front-of-the-house staff) to review during the pre-meal huddle.
- Standardized recipes will utilize products from approved vendors with the ingredients, sub-ingredients and allergens and gluten identified.

Vendor Product Substitutions.

- In the event product substitutions are made and the ingredient is different from the product code on the recipe, production staff are required to review the ingredients, sub-ingredients, and allergens/gluten information to determine if the product has been changed.
- In the event the product substitution has a variance in ingredients that contain allergens or gluten, the appropriate Go-To team member will be notified to implement the alert to the staff and customers. The customer alert may include:
    - Information posted through appropriate social media
    - Allergen and Gluten Alert signage posted by the food
    - Notify the client to relay to participants or customers
- If the product change is permanent, the assigned recipe creation team (and where applicable, the menu management team) will be notified to change the recipe and product code.

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1.10 PRODUCTION: MENU ACCURACY

POLICY

Menus that identify allergens and gluten will be available to guests.

PROCEDURE

MENUS

Units with allergen programs will have menus available with allergens and gluten identified; matched to recipes and products.

Menus.

- Menus are developed in accordance with the applicable rules of each segment, although in most cases by regional managers, corporate chefs and/or dietitians. Menus shall be put in place based on requirements and or standards set forth by the company, contract or applicable regulation or law.
- Menus should include a standardized recipe or product preparation instruction with product codes and required ingredients and identification of allergens and gluten.

Menu Substitutions.

- If menu substitutions are made, the modified ingredient list (including allergens), will be made available to the guest. Allergen and Gluten Alert sign will be posted. (Refer to substitutions policy and p. pg. 60.)
- Where possible, staff shall use best efforts to attempt to alert those guests, whom staff knows have identified food allergies or gluten intolerance, if a consistent product offering that had been allergen/gluten-free, now contains an allergen or gluten.
- Where the ingredient change introduced an allergen, the same shall be noted on the ingredient/allergen list and a substitute offering shall be identified (or alternate ingredient) where possible.
- In the case of a menu substitution in a menu item created specifically for a continuing guest (for example, where we have developed menus for specific guests, particularly in K-12 schools, higher education sites, corrections sites, healthcare and hospital sites), the guest will be notified of the modified menu item, the ingredients in the modified menu item and, where appropriate, of an alternative recommendation.
- Every effort will be made to avoid run-outs and substitutions of products required to meet the needs of continuing guests with food allergies or celiac.
- Menu items cannot be changed from the original recipe and served to the guest with a known allergy, without providing notice that the recipe has changed.

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1.11 SITES WITHOUT MENU MANAGEMENT SYSTEMS

POLICY

Team members must be able to communicate allergen and gluten information to guests for all foods served when using a manual process for the flow of food.

PROCEDURE

All sites must be able to provide allergen information for each menu item. When a menu management system is not available the manual system may be utilized for all business segments.

At sites where we serve repeat guests with allergies (K-12 schools, higher education sites, corrections sites, healthcare and hospital sites), it is recommended that the manual process be utilized. At sites where we may have reoccurring customers that have food allergies (retail), it is recommended that a Go-To team member is available to answer food allergen questions or the manual system is utilized.

Option A. Assign a Go-To team member to know the ingredients, recipes, preparation methods and menus. The individual will be responsible for verification of ingredients on labels for available menu items.

Option B. If there is no individual(s) that can be assigned as the Go-To team member, utilize the manual process by completing the matrix (see page pg. 31) for the recipes.

Manual Process. For each menu offering prepared at a site, the site must:

- Write down the ingredients and sub-ingredients using the allergen matrix form. Include the supplier's name, product brand and ingredient description.
- Record the original date of preparation.
- Check the ingredient lists on the product and indicate on the matrix which ingredients contain the presence of allergens and/or gluten. If the label states that the product "may contain an allergen" also check that box in the matrix.
- Carefully review the labels to determine whether the product includes any of the key allergens (do not solely rely on the allergen list on the label) and/or gluten.
- Repeat this for all ingredients used in each dish.
- Remember to include all ingredients in your recipe including: sauces, dressings, garnishes or other addition (e.g. parmesan cheese) that are added at the point of service.
- For ingredients that contain nuts or cereal with gluten, record the specific type of nut or cereal.
- Preparation method. For recipes prepared on a flat-top grill, deep fryer, etc., note that the recipe must be prepared using segregated equipment per policy 1.13.
- Maintain this in the site allergen file. Verify that there have not been any changes to ingredients when making this recipe on any occasion. If there have been substitutions, complete a new form, with a new date, indicating that the product was a substituted product and document the allergens.

Follow Segment-specific and Client-specific Requirements for Allergens. Review and ensure understanding of segment-specific policies. In addition, clients may have site specific requirements for the provision of allergen and gluten information in a format other than the standard company procedure. In these instances, flag this information to the District Manager to ensure we can comply with the client requirements without creating a risk of liability or incident.

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1.12 SITES WITH MENU MANAGEMENT SYSTEMS

POLICY

Team members must be able understand and to communicate to guests allergen and gluten information for the food served. Our sites either use a manual process for the flow of food (procurement to production service) or they have a menu management system. The site will follow the appropriate procedure for their type of site.

PROCEDURE

All sites must be able to provide allergen and gluten information for each menu item. The manner in which this is provided will depend both on the menu management system availability and use and the business segment requirements. The manual process may be used by all areas of the business.

Menu Management System. If substitutions are made, the site needs to notify its menu management team of any identified change in ingredient or substitution to ensure accurate information is available.

Follow Segment-specific and Client-specific requirements for Allergens. Review and ensure understanding of segment-specific policies. In addition, clients may have site specific requirements for the provision of allergen and gluten information in a format other than the standard company procedure. In these instances, flag this information to District Manager to ensure we can comply with these client requests without creating a risk of liability or incident.

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ALLERGEN & GLUTEN MATRIX FOR MANUAL PROCESS

Recipe Name: _____ **Recipe Number:** _____

Original Date of Production: _____ **Subsequent Dates of Production:** _____

Ingredient Description Supplier name/product brand/ingredient description	Eggs	Fish	Gluten	Milk	Peanuts	Cr. Shellfish	Soy	Tree Nuts	Wheat	Sesame		Other Provide a written description or substitution

Key

X = Contains allergen **M** = May contain allergen **Blank** = Does not contain allergen

ALLERGEN & GLUTEN MATRIX FOR MANUAL PROCESS

Recipe Name: Lasagna **Recipe Number:** 0000344

Original Date of Production: 1/27/22 **Subsequent Dates of Production:**

Ingredient Description Supplier name/product brand/ingredient description	Eggs	Fish	Gluten	Milk	Peanuts	Cr. Shellfish	Soy	Tree Nuts	Wheat	Sesame		Other Provide a written description or substitution
Beef, Ground Bulk – Sysco												UPC 7190084 Beef
Fresh Yellow Onions – Sysco												UPC 5440211
Cheese Ricotta, Whole Milk – Sysco				X								UPC 8446827: Contains milk
Spice, Garlic Granulated – Sysco												UPC 6659165: Made from garlic cloves
Spice, Basil Leaves – Sysco												UPC 5238341: Basil—does not contain obligatory allergens as listed in regulations
Cheese Parmesan – Sysco				X								UPC 187 3301: Contains milk
Egg, Whole Liquid – Sysco	X											UPC 2565539: Contains egg
Marinara Sauce – Sysco												UPC 4981086: Does not contain obligatory allergens as listed in regulations
Pasta Lasagna Sheet – Sysco	X		X									UPC 2290922: Contains wheat and eggs
Cheese, Mozzarella, Whole Milk – Sysco				X								UPC 2856108: Contains milk

SAMPLE

Key

X = Contains allergen **M** = May contain allergen **Blank** = Does not contain allergen

1.13 BACK-OF-THE-HOUSE: PREPARING AND COOKING ALLERGEN & GLUTEN AWARE FOODS

POLICY

Team members must follow guidelines to avoid cross-contact when cooking allergen and gluten aware foods.

PROCEDURE

Ingredients. Ensure that proper ingredients are used in each recipe. Use the required brand of ingredients as different brands can contain different formulas. Check every label every time to ensure allergens have not changed.

Preparation Area. Use a separate preparation area for allergen and gluten aware menu items. If separate areas are not available, thoroughly clean and sanitize the surface prior to preparation of menu items for individuals with allergies or gluten intolerance. Equipment such as blenders, food processors, and slicers should be taken apart and thoroughly cleaned if being used for allergen/gluten aware foods. If separate cookware, utensils, equipment or serviceware are unavailable, inform guests. Whenever possible, non-allergenic ingredients or meals should be prepared **PRIOR** to preparing meals containing allergens and gluten. If this is not possible, food may need to be prepared at designated times or in designated areas in order to prevent cross-contact.

Hygiene. Ensure hands and cloths are clean to avoid transferring allergen and gluten containing food particles. Use a clean apron, gloves and hair coverings. Thoroughly wash hands prior to donning gloves. (See hygiene and handwashing policies.)

Cookware and Serviceware. Use cookware, utensils, equipment and serviceware specifically identified for allergen and gluten aware food. This includes, without limitation, chopping boards, knives, mixers, bowls, pots, pans, woks, griddles and utensils. Do not use a shared griddle for allergen/gluten aware foods: use a clean frying pan. If separate items are not available, wash and rinse all items thoroughly prior to preparation of menu items for individuals with allergies or gluten intolerance. Where separate cookware, utensils, equipment or serviceware are unavailable, inform guests. Avoid using cookware that is encrusted with carbonized or burnt food residues.

Equipment. Use separate fryers and cooking oils when frying food for customers with food allergies, celiac disease, or gluten sensitivity. If using a separate fryer is not possible, then prior to preparing allergen and gluten food, discard the oil, clean the equipment and replace with fresh oil. Or, fry in clean oil in a clean pan. Use separate thermometers. Designated equipment such as toasters, microwaves, separate cooking utensils, toaster ovens, grills and table top fryers may also be needed when preparing allergen and gluten aware foods.

Holding Foods. Keep allergen and gluten aware foods covered, labeled and dated. Ensure they do not touch any other food item, beverage, utensil, equipment, glove or surface.

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1.14 FRONT-OF-THE-HOUSE: SERVING ALLERGEN AND GLUTEN AWARE FOODS

POLICY

Team members must follow guidelines to avoid cross-contact when serving allergen and gluten aware foods.

PROCEDURE

Menu Items. Verify with the chef on duty that proper ingredients were utilized in preparing each menu item. Review any substitutions during the pre-service huddle.

Service Line Area. When serving from a service line, ensure all areas have been cleaned and sanitized prior to placing food on the service line. Ensure all utensils are part of the designated equipment used to serve allergen and gluten aware foods. (Note: If allergen and gluten aware meals are prepared and stored in a specific location, ensure the storage area is cleaned and sanitized prior to storing the food and allergen and gluten aware food handling precautions are followed when serving the customer the prepared menu items.)

Service Process. The server should take the order from the customer, answering any questions, then place the meal on a clean plate and hand it to the customer along with clean flatware.

Hygiene. Ensure hands and cloths are clean to avoid transferring allergen and gluten containing food particles. Use a clean apron, gloves and hair coverings. Thoroughly wash hands prior to donning gloves. (See hygiene and handwashing policies.)

Serviceware. Use utensils, equipment and serviceware specifically identified for allergen and gluten aware food. Ensure the equipment has been cleaned and sanitized according to the allergen and gluten aware guidelines. If dedicated serviceware is not available, inform the guests that cross-contact may be possible.

Separate Foods. Keep allergen and gluten aware foods covered. Ensure they do not touch any other food items, beverages, utensils, equipment, gloves or surfaces.

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1.15 FRONT-OF-THE-HOUSE: SELF-SERVICE AREAS

POLICY

Team members must follow guidelines for layout of all self-service areas to group like allergen and gluten containing items together.

PROCEDURE

Menu Items. Team members who are preparing food for self-service areas will communicate with staff to ensure no menu items or food substitutions have been made prior to set-up. Ensure that extra menu products are available for preparation and labeled if a guest requests a menu item be prepared separately from the self-service area (e.g. salad or deli sandwich). Post signage indicating that food allergic customers should request their item be prepared specifically for them.

Service Line Area. Ensure all menu items in self-service areas are set-up to group like allergen and gluten containing items together (e.g. fresh or canned single ingredient fruits and vegetables in one area of the salad bar, separate from cheeses, eggs, and composed salads). Ensure all food items on the self-service areas are clearly labeled and there are separate tongs or serving utensils for every item. Ensure staff do not overfill containers and that the self-service areas are kept free from spills and debris.

Ingredient information. Ensure that full ingredient information is available on-site or online for all menu items.

Hygiene. Ensure hands and clothes are clean to avoid transferring allergen containing food particles. Use a clean apron, gloves and hair coverings. Thoroughly wash hands prior to donning gloves. (See hygiene and handwashing policies.)

Cleaning. Ensure staff use fresh cleaning supplies for cleaning self-service areas.

Desserts. Notify customers that your on-site bake shop uses allergen/gluten ingredients, such as wheat, milk, eggs, peanuts and tree nuts. Have customers ask the Go-To team member for dessert alternatives without their allergens or gluten.

Frozen yogurt or soft serve ice cream dispensers. Consider reserving one machine or side for vanilla only and labeling as such.

Toppings bars. Consider eliminating peanuts and tree nuts as toppings for oatmeal, ice cream, or salad bars. If nut toppings are used, have available in one central location rather than at each individual bar.

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1.16 CATERING

POLICY

Designated team members will meet with event planners and determine if allergen or gluten aware meals are required.

PROCEDURE

Planning. Catering directors or designee will communicate with event planners regarding any individuals who may need separate menu preparation. Event planners should include questions on dietary requirements with invitation to invitees. Event planner should give food allergic guest contact information for catering.

Communication. Catering manager or Go-To team member will inform catering staff of separate meals or accommodations being made for guests. All food items on buffets will be labeled with the menu name, allergens and/or gluten.

Ingredients. Use only standardized and approved ingredients. If non-standardized ingredients or recipes are used, complete allergen matrix. Ensure that proper ingredients are used in each recipe. Use caution to ensure that we are using the required brand of ingredient as different brands can use different formulas.

Preparation Area. Where possible, use a separate preparation area for allergen and gluten aware menu items. If separate areas are not available, thoroughly clean and sanitize the surface prior to preparation of menu items for individuals with allergies or gluten intolerance. Where separate cookware, utensils, equipment or serviceware was unavailable, inform guests of the same. Whenever possible, non-allergenic ingredients or meals should be prepared prior to preparing meals with allergens. For off-site catering, consider preparing allergen-aware items in the main kitchen prior to arriving at off-site location.

Hygiene. Ensure hands and clothes are clean to avoid transferring allergen containing food particles. Use a clean apron, gloves and hair coverings. Thoroughly wash hands prior to donning gloves. (See hygiene and handwashing policies.)

Cookware and Serviceware. Use cookware, utensils, equipment and serviceware specifically identified for allergen and gluten aware food. This includes, without limitation, chopping boards, knives, mixers, bowls, pots, pans, woks, griddles and utensils. If separate items are not available, wash and rinse all items thoroughly prior to preparation of menu items for individuals with allergies or gluten intolerance. Where separate cookware, utensils, equipment or serviceware was unavailable, inform guests. Avoid using cookware that is encrusted with carbonized or burnt food residues.

Catering Staff. Catering staff will follow all allergen and gluten protocols through proper training and safe food handling. Pre-meal huddles to reemphasize the protocols of safe food handling and the prevention of cross-contact when serving meals is recommended. For waited table service, manager or servers need to inquire about food allergy and/or gluten concerns prior to serving first course.

Guest Responsibility. It is the responsibility of the guest to alert event planners to their allergy needs and to alert the on-site server and manager about allergies upon arriving at the function.

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1.17 FOOD TRUCKS

POLICY

Team members must take proper measures to ensure that we are able to properly communicate allergen and gluten information to our guests.

PROCEDURE

Staff Responsibility.

- Post disclaimer warning of allergen containing ingredients and risk of cross-contact.
- Food truck staff should demonstrate knowledge of allergens as they pertain to the food truck menu.
- Staff should be able to identify major food allergens and symptoms of an allergic reaction.
- When possible use separate area, smallwares, and ingredients for allergen and gluten aware items.
- Share recipes and ingredient labels with customers on request.
- Person-in-charge is responsible for ensuring that team members are properly trained in food allergy awareness and opportunities to avoid cross-contact.

Customer Responsibility.

- Is proactive about communicating their allergies and needs to the food truck staff.
- May request recipes, ingredient labels, or allergen/gluten information for meals served.
- Recognizes signs and symptoms of an allergic reaction and carries epi-pen.
- Understands risk of cross-contact in a food truck.

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1.18 COMMUNICATING ALLERGENS TO GUESTS

POLICY

Team members must take proper measures to ensure that we are able to properly communicate allergen and gluten information to our guests.

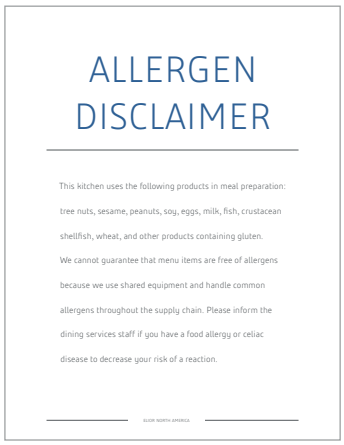
PROCEDURE

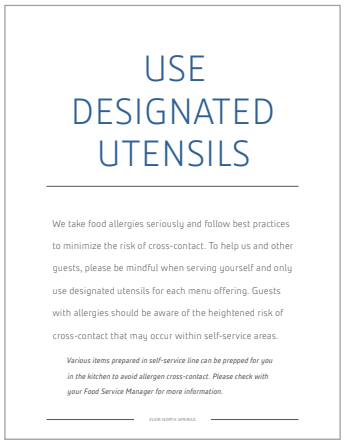
Menu Management System. If a site has a menu management system with a digital display for consumers (StarChef, CBORD, etc.), the site should verify daily that allergens and gluten are properly displayed in the system. If information is not properly displayed, the site supervisor should contact their menu management team or their wellness team. When online information is incorrect, the Allergen and Gluten Alert Sign should also be posted.

Signage.
Sites should always post:

- A sign notifying guests that if they have a food allergy they should request to speak with the Go-To team member to answer their questions and to help ensure we can meet their needs.
- The allergen disclaimer is posted in the dining locations.
- Where self-serve options are available, post the self-service sign indicating that food allergic customers should request their item be prepared specifically for them (See Policy 1.15).







Go-To Team Member Discussions. The Go-To team member should be prepared to have a conversation with guests who are requesting additional information about allergens and gluten. In so doing, the Go-To team member should:

- Understand the guest's needs.
- Verify that their requested menu item meets that need by checking the matrix or menu management system and verifying with the chef that the information matches the ingredient labels of the product.
- If the Go-To team member is unable to determine (e.g. the chef has left) whether the product contains the allergen or gluten, the Go-To team member should inform the guest that they cannot confirm that the requested menu item is allergen or gluten aware.
- The Go-To team member should generally advise against fried foods or self-serve items. These items may be specifically prepared to avoid cross-contact.

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LABELING

For self-service areas, all labeling and signage requirements must be followed as set forth in policy 5.2 Self-Service Labeling of the Food Safety Manual (reference the policy below).

Label food located in self-service areas, including bulk self-dispensing items, bulk unpackaged foods and packaged foods.

Self-dispensing Bulk Food. Label bulk food that is available for consumer self-dispensing (cereal, ice cream, etc.) with one of the following:

- The manufacturer's or processor's label that was provided with the food, which must include ingredients and allergens. If product contains gluten from a non-wheat source, this must be added.
- A card, sign or another method of notification that includes the following:
    - The common name of the food or adequate description.
    - If made from two or more ingredients, a list of ingredient and sub-ingredients in descending order of predominance by weight, including a declaration of artificial colors, artificial flavors and chemical preservatives, if contained in the food.
    - List allergens and gluten and "may contain" or the precautionary warning label per manufacturer's label.

Unpackaged Bulk Foods. Bulk, unpackaged foods, such as bakery products and unpackaged foods, that are portioned to consumer specification (rolls, toppings bars) must be labeled the same as above unless:

- A health, nutrient content or other claim is not made. AND
- There are no state or local code requiring the labeling.
- The food is manufactured or prepared on the premises of the food establishment or at another food establishment or a food processing plant that is owned by the same person and is regulated by the food regulatory agency that has jurisdiction.

Packaged Foods. Label foods packaged for grab-and-go with the following:

- Common name of the food or a statement that clearly identifies it.
- If prepared for offsite consumption, quantity of the food (net weight or volume statement in metric and grams/ounces).
- A use-by date.
- If prepared for offsite consumption:
    - List of ingredients and sub-ingredients in descending order by weight. This is necessary if the item contains two or more ingredients.
    - List of artificial colors, chemical preservatives and flavors in the food.
    - List of major food allergens and gluten in product.
    - Heating instructions if applicable.
    - Name, city, state and zip code of the manufacturer, packer or distributor. Full address is needed if the location is not listed in a current city directory and/or telephone book.

Carry-Out Containers. Labeling requirements do not apply to customers' leftover food items placed in carry-out containers.

DINING AREAS

Sites may have designated dining areas in which individuals with allergies/gluten intolerance may eat their meals where there has been no cross-contact with the top nine allergens/gluten. The dining areas must be cleaned according to the Policy 1.8: Allergen and Gluten Cleaning and Sanitizing. The designated areas do not prevent airborne transfer of allergen/gluten particles. The benefit of a designated dining area: reduced risk for surface transfer of allergen/gluten particles. The risk of a designated dining areas: less social interaction for guests with allergies or gluten intolerance.

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1.19 ALLERGEN AND GLUTEN AWARE ORDER COMMUNICATION

POLICY

For sites where we repeatedly serve the same guests with allergens (for example, K-12 schools, higher education sites, corrections sites, healthcare and hospital sites), the food service department will request a medical order by a licensed physician in order to ensure that we can continuously provide an allergen aware or gluten aware menu option. In the case of in-house retail sites or in-house food trucks where we may not have repeated visits by the same guests (such as restaurants, cultural attractions, business and industry or catered events), we will work with guests to satisfy their allergen and gluten requirements.

PROCEDURE

REQUIREMENT

Sites where we repeatedly serve the same guests with allergens (for example, K-12 schools, higher education sites, corrections sites, healthcare and hospital sites), the food service department will request and whenever possible require a medical order communication form indicating the type of food allergy or gluten intolerance, omitted foods and/or allowed meal substitutions prior to serving an allergen or gluten aware meal. If an order is requested but not received, the stated diet restrictions will be documented and honored while waiting for the order to arrive.

Some settings (healthcare) require a diet order to feed the individual. However, it the diet order is “regular” and the patient states that they have an allergy, we will honor that statement with meals free of stated allergens.

Sites where we may not have repeated visits by the same guests (such as restaurants, cultural attractions, business and industry or catered events). It is understood that the customer will communicate their allergen and gluten needs with the service personnel and that we will have designated team members trained to ensure correct information is related to the back-of-the house production staff and front-of-the house staff.

COMMUNICATION

Sites where we repeatedly serve the same guests with allergens (for example, K-12 schools, higher education sites, corrections sites, healthcare and hospital sites). Upon receipt of medical order communication, the information will be reviewed, and the appropriate staff will be informed regarding the allergen and gluten requirements of the individual(s). The location manager or person-in-charge should contact the regional dietitian or on-site registered dietitian for further discussion and/or information when reviewing the menu and products to be purchased.

MEDICAL RECORDS

The dining team should NOT wait for medical documentation before implementing accommodations to keep food allergic and celiac individuals safe. In the event that the dining team feels that medical clarification of diet restrictions is necessary, the onsite or regional registered dietitian may communicate with physicians (with student, guardian, guest permission) or the college health, accessibility services department, nursing, or other medical praticitioner licensed to do so. Medical communication is confidential and should be obtained and filed by the appropriate person and in a secure location.

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FOOD SERVICE RECORDS

A copy of menus and recipes utilized in the preparation of allergen and gluten aware meals should be maintained on file. Purchasing records, including product substitutions, should also be maintained according to company timelines.

INCIDENT RECORDS

If a guest has an adverse reaction, the incident should be reported to responseteam@elior-na.com. All team members who have access to medical information must comply with the Elior North America's Health Insurance Portability and Accountability Act (HIPAA).

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1.20 ALLERGEN COMMUNICATION FLOW CHART

Hot Counters/Deli/ Salad Bar/Coffee Bar

Pre-service huddle.
Follow pre-service huddle protocol. Go-To team member will notify pre-service huddle team members of any product substitutions.

Signs.
Ensure guest notice, disclaimer and self-service signs are posted. Link

Review high risk areas.
Visually review the high risk service areas for cleanliness, Elior North America disclaimer and self-service allergen and gluten notices.

Allergen/Gluten information availability.
If allergen/gluten information is available by digital or printed means, verify information is correct prior to publication. Provide information to guest as required.

Grab & Go

Signs.
Ensure guest notice and disclaimer signs are posted. Link

Label.
Ensure grab & go items are properly labeled in accordance with legal requirements.

Go-To team member.
The Go-To team member should verify the ingredients and allergens/gluten labeled. The Go-To team member should inform the team of any product substitutions. Notify customer of allergen/ gluten changes based on segment requirement.

Allergen/Gluten information availability.
If allergen/gluten information is available by digital or printed means, verify information is correct prior to publication. Provide information to guest as required.

Alcohol

Pre-service huddle.
Go-To team member notifies pre-service huddle team members of any product substitutions.

Signs.
Ensure guest notice and allergen disclaimer signs are posted. Link

For alcohol served from the bottle.
Provide the information from the bottle label to the guest for review.

Allergen/Gluten information availability.
If allergen/gluten information is available by digital or printed means, verify information is correct prior to publication. Provide information to guest as required.

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Restaurants/Catered Events

Pre-service huddle.
Go-To team member notifies pre-service huddle members of any product substitutions and special guest requests received in advance.

Signs.
Ensure guest notice and disclaimer sign is posted or included on menus.

Prior to the guest placing an order.
Ask guests about food allergies or intolerances. If allergies or intolerances are identified, prepare separate allergen and gluten aware dishes or verify the selected dish meets their needs.

Go-To team member.
The Go-To team member should deliver the verified meal to the guest and/or verify the meal prior to wait staff delivering.

Posting allergen information.
Consider using tent cards or menu displays to provide information about allergens to guests.

Allergen/Gluten information availability.
If allergen/gluten information is available by digital or printed means, verify information is correct prior to publication. Provide information to guest as required.

Communication with Medical Order

Medical order.
School, universities, healthcare, hospitals and corrections food service departments must have on file a medical order outlining the food allergen/gluten meal requirements. Medical communication is confidential and should be filed according to Elior North America HIPPA policy.

Production/purchasing.
Menu items required to meet individual food allergen/gluten needs per medical order are communicated to purchasing and production in order to comply with requests.

Pre-service huddle.
Go-Team member will update the staff on changes in medical orders and new medical orders for each service period.

Service.
Team members who directly serve individuals requiring allergen and/or gluten aware meals will follow allergen and gluten food handling and service protocols.

Allergen/Gluten information availability.
If allergen/gluten information is available by digital or printed means, verify information is correct prior to publication. Provide information to guest as required.

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SEGMENT SPECIFIC ALLERGEN AND GLUTEN AWARE PROGRAMS

K-12/INDEPENDENT SCHOOLS

COLLEGE/UNIVERSITY

HOSPITAL/HEALTHCARE

CONGREGATE MEALS

K-12/INDEPENDENT SCHOOLS

As parents prepare to send their children with a food allergy or intolerance to school, they must partner with a campus-wide team of individuals that will be involved in managing their children's food allergies. The campus-wide team may consist of administrators, school health professionals, faculty, food service department, coaches, environmental and transportation staff. Each team member along with the parents and students has certain responsibilities. Below you will find the recommendations that support the allergen and gluten aware process. The key is to ensure that there is open communication and dialogue with all team members.

School Responsibility.

- Lead the school's team approach to implementing a Food Allergy Management and Prevention Plan (FAMPP).
- Meet with parents and students who have food allergies/intolerances to ensure medical paperwork is available.
- Staff members will be trained to understand food allergy basics, recognize symptoms, know emergency plan protocols, and participate in the elimination of potential food allergens during class time.
- Develop and implement policies regarding student medications being held by students themselves or by school nurse or others.
- Consider implementing stock epinephrine depending on state law and specific circumstances.
- Be prepared to handle a reaction and consider designating a trained staff member to be available to administer medication at the site.
- Ensure health professionals are available to help teach students with food allergies how to develop self-management skills and how to recognize a food allergy reaction.
- Ensure that the health professionals meet with the location supervisor (cafeteria/dining food service director or person-in-charge) and provide a list of students who have food allergies/intolerances.
- Provide a safe/designated (as needed) eating area for student(s) with allergy needs or risks, along with a cleaning plan for this area.
- Ensure that cafeteria staff practices safe preparation for allergen and gluten aware foods.
- Ensure the health professionals provide updated information to the cafeteria/dining hall team members appropriate to their role, regarding the students who have food allergies/intolerances.
- Communicate to parents, students, and faculty, through announcements, educational programs and other methods, the policies and procedures used to prevent food allergy reactions.
- Take threats or harassment against a student with allergies seriously.
- Ongoing team meetings to review FAMPP (Food Allergy Management and Prevention Plan).
- Ensure transportation (bus) policies are in place: emergency protocol, no sharing, assigned seats.
- Recognizing students that qualify for section 504 of the Rehabilitation Act of 1973, the Americans with Disability Act (ADA) and understanding responsibilities.

Parent Responsibility.

- Inform the school that your student has a food allergy/intolerance when he/she enrolls or is newly diagnosed with a food allergy/intolerance.
- Meet with the food service director/chef prior to the start of school to review the food protocols and menu. Include student and family as age-appropriate.
- Provide documentation including a medical order, type(s) of food allergy/intolerance, requested meal accommodations and a list of "yes" foods (safe foods that the student likes and will eat) and a list of "no" foods (foods that are unsafe for the student.)

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- Provide labeled epinephrine auto-injector and/or other medications needed and parent/guardian signed consent to administer all medications. Parent responsible to replace when near expiration date.
- Participate in team meetings and communicate with team members to discuss implementation of medical plans of care, establish prevention plan, and periodically review and update plans with the team.
- Inform appropriate team members about their student's potential food allergy reactions during school activities.
- Teach their student common symptoms of anaphylaxis and how to react:
    - Recognize the first symptoms of an allergic/anaphylactic reaction.
    - Communicate clearly as soon as they feel a reaction starting.
    - Carry an epinephrine auto-injector when appropriate or know where one is kept and who has access.
    - Provide emergency contact information.

Student Responsibility.

- Should be proactive in the management of their food allergy/intolerance, based on age and developmental level.
- Should develop a relationship with health professionals and other allergen team members to identify, review, and discuss any allergy/gluten management related issues.
- Have knowledge of and work with (age appropriate) the campus-wide team to establish procedures for reviewing the menu and receiving meals. Those procedures should be documented in the student's individual health plan.
- Will have ongoing communication with food service director/chef regarding menus and cafeteria workers who will serve the meals adhering to the following protocols:
    - Weekly meeting with food service director/chef to review menus and any changes in menus.
    - Understanding what the food items will look like (pictures of food items may be included).
    - Recognizing who will serve the meal and/or the location of the meal if the meal is to be picked up by the student.
    - Verify with the manager or person-in-charge that the food items are the ones designated for that day and meal to be served.
    - Verify with assigned manager or person-in-charge questions regarding allergens or nutrition.
    - If selecting his/her own meals from the cafeteria line, other venues or vending machines, the student will be responsible for selecting allergen and/or gluten-free foods and should not eat any food items with unknown ingredients or not clearly labeled as free of the student's allergens or gluten. In the case of meals provided on the serving line, the cafeteria will provide the allergen (Top 9)/gluten information regarding the food that is served.
- Take as much responsibility as possible for his/her own safety (age appropriate).
    - Recognize safe and unsafe foods and the strategies to avoid potential unsafe foods.
    - Understand the importance of handwashing before and after eating.
    - Understand that specific allergen aware eating areas may be available (as needed).
    - Establish communication with the food service director/chef or other individuals serving the student's meal.
    - Should not share meals or food items with other students.
- Be aware of surroundings and make reasonable efforts to avoid triggering an allergic reaction. Depending on the student's individual medical need, those efforts could involve but are not limited to:
    - Avoiding an area where an allergen spill has taken place.
    - Avoiding an area in the cafeteria that is intended to provide or does provide known food allergens (e.g. for a child with a dairy allergy, the area near milk or ice cream dispensers) or in the case of an airborne food allergen avoid an entire area where the foods are located.

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- Symptoms and/or allergic reaction:
    - Inform teachers, nurse, or other school staff members immediately if exposure to an allergen or symptoms occur.
    - Have epinephrine auto-injector (age appropriate) or access to one.

Food Service Responsibility.

- Ensures food service director, chef, and supervisory personnel have completed an approved ANAB allergen certification program.
- Holds annual allergen training for all team members prior to start of school.
- Team members are trained to recognize symptoms of food allergy reactions and to respond to emergency.
- Ensures new team member orientation includes allergen/gluten training.
- Ensures individuals who change positions within the department and who may assume responsibility for allergen and gluten aware food preparation have completed the ANAB allergen certification program.
- Complete Allergen and Gluten Aware Site Audit to ensure the following:
    - Dedicated equipment is in place to prepare the allergen and gluten aware foods.
    - Allergen and gluten aware sanitation, ware washing, and hygiene policies and procedures are in place.
    - Appropriate storage areas for allergen and gluten-free food are designated.
    - Recipes and labeled ingredients are available for individuals who may have questions.
    - Team members recognize that allergen and gluten aware food(s) may need to be prepared at certain times or in designated areas in order to prevent cross-contact.
    - Go-To team member has been trained and identified for each shift.
- Participates in the school's team approach to managing food allergies/gluten intolerances.
- Reviews student's health plan with school health professional to ensure understanding of student needs.
- Location food service director/chef and regional dietitian meets with parent(s) and student(s) to review menus, discuss the food allergies, review "yes" foods and "no" foods, and review processes to prevent cross-contact of potential food allergens/intolerances during food preparation and service.
- Introduces student to food service staff who will be preparing and holding the meals for the student in process outlined. (Note: If student takes responsibility – he/she may want a dedicated location to retrieve meals.)

The information in this manual has been obtained from various sources. Guidance from sections 2.102.11 and 2-103.11 of the FDA Food Code 2022 were used to support policies around allergen and gluten awareness and training. States and/or local authorities may have more stringent or different requirements. Version | 061523

COLLEGE/UNIVERSITY

The number of students in colleges and universities with food allergies and other special dietary needs is growing. College freshman are functioning without their previous family and school support systems in dining and all aspects of the college experience. It is important that college and university students are connected to the appropriate services on campus to ensure their food allergies and dietary needs can be met.

College/University Responsibility.

- Lead the college/university's team approach to managing food allergies/intolerances.
- Provide a clear process for requesting accommodations/modifications by students and parent/guardians through outreach and marketing programs.
- Establish communication channels to promote student disclosure of food allergies/intolerances.
- Provide links to college/university websites that will explain the current food allergen/dietary policies on campus.
- Provide the current medical documentation process to establish an individual's food allergy and dietary needs in consultation with the campus health/wellness center. Ensure accommodations can begin prior to medical documentation.
- Establish emergency procedures to respond to an allergen reaction and consider designating trained staff member(s) to administer medication at the site.
- Provide policies regarding residential life accommodations, food accommodations and training.
- Provide a safe/designated eating area for student(s) with allergy/gluten needs or risks if required.
- Provide a communication process for on-campus health professionals to provide updated student food allergen/dietary needs to the team members.
- Provide communication to students and faculty through announcements and education programs to aid in the prevention of food allergy reactions.
- Ensure policies are in place for students to request a modification or release from mandatory meal plans.
- Take threats or harassment against a student with allergies seriously.
- Provide ongoing team meetings to review the campus-wide allergen program.

Student Responsibility.

- Should be proactive in the management of their food allergy and/or special dietary needs.
- Should develop a relationship with health professionals and other allergen team members to identify, review and discuss allergy/gluten management related issues.
- Should work with the campus-wide team to establish an individual dining plan and then follow such procedures for selecting and receiving meals. The procedures should be articulated in the student's conversations with the site supervisor and/or dietitian. The procedures could include having specially trained dining team members prepare separate meals or allowing the student to select food directly from designated stations as discussed in individual plan.

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- Will have ongoing communication with food service director/chef/person-in-charge regarding menus and dining team members who will serve the meals adhering to the following protocols:
    - Weekly meetings with the food service director/chef to review menus and any changes in menus.
    - Recognize who will serve the meal and/or the location of the meal if the meal is to be picked up by the student.
    - Verify with the food service director/chef/Go-To team member that the food items are the ones designated for that day and meal to be served.
    - Verify with assigned food service director/chef/Go-To team member questions regarding allergens or nutrition information.
    - If selecting his/her own meals from the cafeteria line, other venues, or vending machines, the student will be responsible for selecting allergen and/or gluten-free foods and should not eat any food items with unknown ingredients or not clearly labeled as free of the student's allergens. In the case of meals provided on the serving line, the cafeteria will have available the major food allergens and gluten information regarding the food that is served.
- Should be aware of surroundings and make reasonable efforts to avoid triggering an allergic reaction. Depending on the student's individual food allergen/dietary needs, and as discussed in the individual plan, those efforts could involve but not be limited to:
    - Avoiding an area where a food allergen spill has taken place.
    - Avoiding an area in the cafeteria that is intended to provide or does provide the known food allergy/gluten items.
    - Avoiding a self-service area where there may be cross-contact.
    - Avoiding an entire area in the case of an airborne food allergen.
- Will be able to recognize signs and symptoms of an allergic reaction and:
    - If prescribed, have epinephrine auto-injector (i.e., EpiPen) on person at all times.
    - Always carry emergency contact information.
    - Inform faculty, health professionals, or fellow students immediately if exposure to an allergen or if symptoms occur.

Food Service Responsibility.

- Participates in the college/university's team approach to managing food allergens/gluten.
- Works with other departments to encourage disclosure of food allergies, and to manage medical documentation.
- Ensures food service director, chef, and supervisory personnel have completed an approved ANAB allergen certification program.
- Holds annual allergen training for all team members prior to start of school.
- Individuals are trained to recognize symptoms of food allergy reactions and to respond to emergency.
- Ensures new team member orientation includes allergen training.
- Ensures individuals who change positions within the department and who may assume responsibility for allergen and gluten-free food preparation have completed an ANAB allergen certification program.

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- Completes the Allergen and Gluten Aware Site Audit to ensure the following:
  - Dedicated equipment is in place to prepare the allergen and gluten aware foods.
  - Allergen and gluten sanitation, ware washing, and hygiene policies and procedures are in place.
  - Appropriate storage areas for allergen and gluten aware food are designated.
  - Recipes and labeled ingredients are available for individuals who may have questions.
  - Staff are aware that allergen and gluten-free food may need to be prepared at certain times or in designated areas in order to prevent cross-contact.
  - Go-To team member has been trained and identified for each shift.
- Designated on-site central point-of-contact (site supervisor, person-in-charge, and/or dietitian) meet with student to develop individual plan, review menus, discuss the food allergies and processes to prevent cross-contact of potential food allergens/intolerances during food preparation and service, discuss methods of communication and student responsibilities.
- Introduces student to food service staff who will be preparing and holding the meals for the student in the process outlined.
- Utilizes dedicated equipment for preparing the meals and appropriate sanitation techniques for cleaning the dedicated equipment.
- The Go-To team member will be available for questions regarding any food ingredients.
- Commitments made in student plans for availability of individual foods items will be honored or communicated to student if item is temporarily unavailable.
- Provides access to recipes and labeled ingredients if requested.
- Team members preparing food for individuals with food allergies or gluten sensitivity must be aware and adhere to the appropriate allergen and gluten hygiene practices. (See 1.7 Allergen Hygiene policy.)

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HOSPITAL/HEALTHCARE

Food allergies continue to be a risk from infancy through adulthood. It is important that on admission, patients/residents with known food allergies, understand that food allergy policies are in place to ensure their safety. Below are sample policies that may be utilized to implement allergen/gluten awareness in healthcare facilities.

Facility/Complex Responsibility.

- Provision of policies from admission to discharge to ensure individuals with food allergies are identified and that they are not served foods to which they are allergic.
- Nursing staff will be responsible for ensuring that the patient/resident food allergies are documented on their admission assessment.
    - If the patient is to receive a meal or snack prior to completion of the admission assessment, their food allergy status must be determined prior to ordering the meal.
- Nursing staff will provide a medical order to the food service staff regarding the patient/resident food allergy needs. Medical orders may be placed by practitioners according to state law and the credentialling policies on the institution.
- Electronic medical records must be designed so that food allergies noted on previous admissions will be brought forward with the medical order on subsequent admissions.
- Patients with an admitting diagnosis of anaphylaxis will have a second review of their medical order by the physician, nurse or dietitian prior to receiving a meal.
- Nursing staff will provide to food service staff any new relevant information regarding food allergies of the patient/resident.
- Policies are in place if there is an allergic reaction to a food item.
- Systems are developed and staff is trained to ensure that the patient/resident is provided with the correct menu options free of their allergens.
- Provisions are made to ensure all staff are trained regarding the facility/complex protocols for treating individuals who have food allergies.

Patient/Resident Responsibility (where applicable).

- At admission and intake, discuss your food allergies/intolerances with the nurse.
- Ask for a wristband that indicates food allergies if you do not have one.
- Ask if you can speak to the location supervisor or dietitian to discuss your food allergies and foods they have to offer.
- Check that the menu slip or ticket on your tray indicates your correct food allergies.
- If you receive a food tray before you have spoken with a food service team member, ask to speak to the dietitian or location supervisor before eating.
- In the case where you receive a tray that is incorrect, notify nursing and the food service department immediately.
- If you feel you may need to bring your own food, inquire of the facility/complex if there is refrigeration and a microwave you may use and/or if the food service department could assist.

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Food Service Responsibility.

- Diet orders should be received by the food service regarding patients/residents with food allergies through the facility diet order process prior to food or fluids being served from the kitchen. In the case where the order is not received, the stated diet restrictions from nursing or the dietitian will be documented and honored while waiting for the order to arrive.
- Patient/resident allergy information will be printed on the meal tickets and the meal ticket will be provided with the meal from the food service department.
- Trained food service team leaders are responsible for checking that the meal provided matches the items on the meal tickets for food allergic patients/residents.
- In the case where a food service team member serves the patient/resident, in addition to the two identifiers required by the organization, they will also verify the patient/resident allergies are consistent between the identification band and the meal ticket.
- A meal that has been prepared for an individual with a known food allergy will not be left at bedside if the patient/resident is not present. Notify nursing staff if the tray is to be held until patient returns.
- If food allergies are not communicated from previous admissions, food service managers and clinical nutrition manager must advocate for changes to the electronic medical record system.
- Anaphylaxis shall be considered a high risk admitting diagnosis for dietitians' patient screening.
- A list will be maintained of patients with food allergies and those menus will be double checked at each meal to ensure that documentation of food allergies is maintained through diet order changes (Example: a food allergic patient going to surgery is now on clear liquids. Allergies must still show on meal ticket with diet order.)
- All meals will be transported to the patients/residents as outlined by the facility protocols. No changes can be made to the meals during transportation. (Example: ice cream cannot be added at patient unit.)
- Food service team members will utilize dedicated equipment for preparing the meals and appropriate sanitation techniques for cleaning and sanitizing the dedicated equipment. (Reference Policy 1.8 Allergen and Gluten Cleaning and Sanitizing)
- Patients/residents will have access to ingredient lists and package labels if requested.
- All food service team members will participate in yearly allergen staff training and complete the allergen training course as outlined by the food service company.
- Team members preparing food for individuals with food allergies or gluten sensitivity must be aware and adhere to the appropriate allergen and gluten hygiene practices. (See 1.7 Allergen Hygiene policy.)

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CONGREGATE MEALS

Congregate meals sites may also deliver to schools and other programs.

The number of individuals with allergies and special dietary needs is growing. Prior to receiving home delivered or congregate meals, many seniors (participants) have known the ingredients of their meals. Congregate sites offer various services and may or may not provide allergen or gluten aware meals. Participants need to know what meal services are available through their congregate sites.

Client Responsibility.

- Develops the mission for the senior nutrition program in their area, which may include customizing programs to meet the special dietary needs or allergen and gluten aware needs of the customer base.
- Provides a clear process for requesting accommodations/modifications for participants in the nutrition program through outreach and marketing programs.
- Provides resources that will explain the current food allergen/dietary programs for senior meals available.
- Provides procedures to handle an allergic reaction and ensures that a trained staff member is available to administer medication at the site and can respond in case of an emergency.
- Provides a communication process for the food service department to receive the number of meals or special meals in the case of home delivered. In the case of congregate meals, the seniors will choose from the posted menu and may inquire for a special meal if applicable. (In the case of serving K-12, medical orders must be provided to the food service department and updated annually.)
- Provides communication to participants through announcements and education programs on the policies and procedures utilized by food service to aid in the prevention of food allergy reactions.
- Communicates with the food service director, chef, and registered dietitian (if available) regarding menus.
- Schedules ongoing team meetings to review the senior nutrition allergy and gluten program (where applicable).

Participant Responsibility.

- Is proactive in the management of their food allergy and/or special dietary needs.
- Develops a relationship with site professionals to identify, review and discuss issues related to allergy/gluten management.
- Works with the site team to establish procedures and follows such procedures for selecting and receiving meals.
- Selects allergen and gluten aware foods (if available) when choosing meals from a cafeteria line and avoids any foods with unknown ingredients.
- May request ingredient or allergen information for meals served.
- Recognizes signs and symptoms of an allergic reaction and:
    - Carries emergency contact information.
    - Informs site supervisors, health professionals, or fellow participants immediately if exposure to an allergen or if symptoms occur.
    - Has epinephrine auto-injector (age-appropriate) or access to one (i.e., EpiPen).

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Food Service Responsibility.

- Participates in the site's team approach to managing food allergies and gluten as applicable.
- Provides allergen and ingredient information as requested. (In the event there is a menu or pamphlet with allergen information and product changes occur, the registered dietitian and food service director will ensure that senior site managers and participants are made aware of the changes.)
- Ensures food service director, chef, and supervisory personnel have completed an approved ANAB allergen certification program.
- Holds annual allergen training for all team members.
- Ensures new team member orientation includes allergen training.
- Ensures individuals who change positions within the department and who may assume responsibility for allergen and gluten-free food preparation have completed the ANAB allergen certification program.
- If applicable, completes the Allergen and Gluten Aware Site Audit to ensure the following:
    - Dedicated equipment is in place to prepare the allergen and gluten aware foods.
    - Allergen and gluten sanitation and hygiene policies and procedures are in place.
    - Appropriate storage areas for allergen and gluten-free foods are designated.
    - Recipes and ingredients are available for individuals who may have questions.
    - Staff are aware that allergen and gluten aware food may need to be prepared at certain times or in designated areas in order to prevent cross-contact.
    - Go-To team member has been identified, had appropriate training and will be able to provide allergen/gluten information upon request or has the knowledge to contact the dietitian for more information.
- Receives specific counts for allergen aware or special diet meals daily.
- Utilizes dedicated equipment for preparing the meals and appropriate sanitation techniques for cleaning and sanitizing the dedicated equipment.
- The food service director and chef will be available for questions regarding any food ingredients.
- Team members preparing food for individuals with food allergies or gluten sensitivity must be aware and adhere to the appropriate allergen and gluten hygiene practices. (See 1.7 Allergen Hygiene policy.)

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APPENDIX

ALLERGEN DISCLAIMER

ALLERGEN NOTICE SIGN

ALLERGEN AND GLUTEN ALERT SIGN

SELF-SERVICE SIGN

ALLERGEN POSTER

MEDICAL ORDER FORM (SAMPLE)

FARE: EMERGENCY CARE PLAN

EQUIPMENT: DESIGNATED FOR ALLERGENS

FACILITY: ALLERGEN AWARE DESIGN

ALLERGEN GLOSSARY

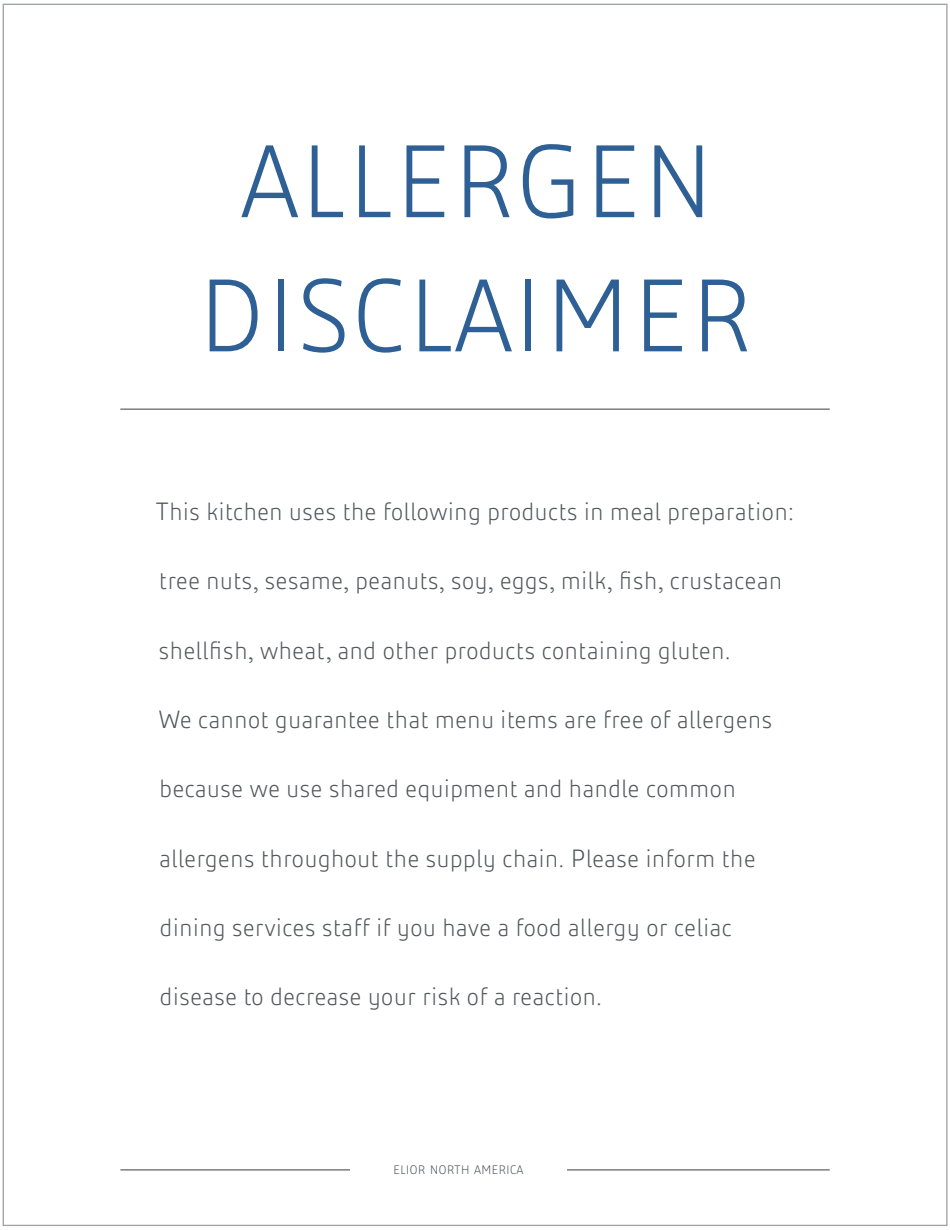
ALLERGEN AND GLUTEN AWARE GUIDELINE FOR ANSWERING AUDIT QUESTIONS

ADDITIONAL RESOURCES

ALLERGEN DISCLAIMER

Use the Allergen Disclaimer signs from our BeWell wellness approach.

Disclaimer. This kitchen uses the following products in meal preparation: tree nuts, sesame, peanuts, soy, eggs, milk, fish, crustacean shellfish, wheat, and other products containing gluten. We cannot guarantee that menu items are free of allergens because we use shared equipment and handle common allergens throughout the supply chain. Please inform the dining services staff if you have a food allergy or celiac disease to decrease your risk of a reaction.



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ALLERGEN NOTICE SIGN

FOOD
ALLERGY

If you have a food allergy, please notify the location supervisor or chef to discuss your allergy requirements to help ensure we can meet your needs.

Various items prepared in self-service line can be prepped for you in the kitchen to avoid allergen cross-contact. Please check with your Food Service Manager for more information.

ELIOR NORTH AMERICA

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ALLERGEN AND GLUTEN ALERT SIGN

Post this sign to alert customers that there has been an allergen change in a product or recipe.



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SELF-SERVICE SIGN

USE DESIGNATED UTENSILS

We take food allergies seriously and follow best practices to minimize the risk of cross-contact. To help us and other guests, please be mindful when serving yourself and only use designated utensils for each menu offering. Guests with allergies should be aware of the heightened risk of cross-contact that may occur within self-service areas.

Various items prepared in self-service line can be prepped for you in the kitchen to avoid allergen cross-contact. Please check with your Food Service Manager for more information.

ELIOR NORTH AMERICA

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ALLERGEN POSTER

Use the Food Allergies poster from our Food Safety Manual.



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CUSTOMER INJURY/ALLERGIC REACTION

STABILIZE THE SITUATION

Emergency. If a customer has a medical emergency, immediately call 911. Have someone notify the client-designated emergency contact (if any).

> Examples: severe allergic reaction, amputation, severe bleeding, persistent breathing difficulty, severe burns, severe chest pains, uncontrollable choking, severe head, back or neck injury, poisoning or unconsciousness.
>
> Common Symptoms of Severe Allergic Reaction: shortness of breath, fainting, breathing difficulty, swollen tongue or lips, hives covering the body, repeated vomiting or a combination of symptoms.

First Aid. Follow first aid guidelines or guidance by emergency responders to treat the victim.

Medical Provider. If an injury or reaction is not an emergency, yet requires medical attention and relates to our product or service, suggest that the customer seek medical attention and inform us of the outcome.

EVALUATE THE SEVERITY LEVEL AND CALMLY COMMUNICATE (INTERNALLY)

Work with the Team to Respond.

Level	SIGNIFICANT	CRITICAL
Allergic Reaction	One (1) individual who is having an allergic reaction and/or requires medical treatment or use of epi-pen	One (1) individual having a sudden, severe, life-threatening event such as trouble breathing, swelling of lips, tongue, face, turning blue, drop in blood pressure, fainting, anaphylaxis which results in use of epi-pen, hospitalization, and/or death
Contact	**Elior North America Response Team responseteam@elior-na.com**	**Crisis Hotline 1.844.627.1339**
Team	• Elior North America Response Team • Food Safety Lead (for segment) • Subject Matter Expert • Insurance Carrier • District Manager • Segment Vice President/ Regional Manager	• Elior North America Response Team • Subject Matter Expert • Insurance Carrier • District Manager • Segment Vice President/Regional Manager • Company President

Investigate. Within 24 hours of accident/injury/allergic reaction, analyze the root cause and begin working toward a solution. Complete Customer Injury Report Form and return to the assigned Risk Manager.

CALMLY COMMUNICATE (EXTERNALLY)

Report to Carrier. Work with the local Risk Manager to report injuries to the appropriate insurance carrier within 24 hours.

Client. Where there are work-related fatalities or serious injuries, work with the Segment Vice President/ Regional Manager and the Elior North America Response Team to properly inform and address the situation with the client.

Media. Do not provide any statements to the media. Refer all media inquiries and/or statements related to allergic reactions to the Elior North America Communications at laura.rojo-eddy@elior-na.com.

CUSTOMER INJURY REPORT

Submit the completed report to the assigned Risk Manager and contact them for assistance completing this form.

SITE INFORMATION

Site Name: _____ **Manager Name**: _____

Reporting Individual: _____ **Date/Time of Report:** _____

Explanation of Customer Injury:

CONTACT INFORMATION

CUSTOMER

Name: _____ **Contact Person (if different):** _____

Phone Number: _____ **Address:** _____

MEDICAL PROFESSIONAL

Name: _____ **Contact Person (if different):** _____

Phone Number: _____ **Address:** _____

WITNESSES

Name: _____ **Contact Person (if different):** _____

Phone Number: _____ **Phone Number:** _____

INJURY INFORMATION

Date/Time Injury: _____

Type of Injury (explain):

Was Medical Treatment Received? ___ Yes ___ No (Check One)

Diagnosis or any Medical Treatment: _____

OTHER

Has There Been Legal Action? ___ Yes ___ No (Check One)

Has Customer Incurred Expenses Related to Incident? ___ Yes ___ No Amount: $_____

MEAL INFORMATION (ONLY COMPLETE IF INJURY RELATES TO FOOD)

Date/Time Consumed: _____

Food Prepared at Site: ___ Yes ___ No (Check One)

FOOD ITEMS CONSUMED

Type of Food: _____

Distributor: _____ **Manufacturer:** _____

Invoice: _____ **Lot#/Code#/Date:** _____

Signature: _____

MEDICAL ORDER FORM

Name	DOB
Address and Phone Number	E-Mail
Additional Address (if Previous Address is Temporary)	Emergency Contact Information
Licensed Physician Name	Licensed Physician Address and Phone Number

FOR LICENSED PHYSICIAN USE ONLY

Food Allergies and Medical Conditions (please check all that apply)

Food Allergy to:

- ☐ Dairy
- ☐ Egg
- ☐ Fish
- ☐ Peanut
- ☐ Crustacean Shellfish
- ☐ Other (please specify):
- ☐ Soy
- ☐ Tree Nut
- ☐ Wheat
- ☐ Sesame

- ☐ Gluten Intolerance
- ☐ Other Medical Conditions requiring Dietary Accommodations (please specify):

Diet Prescription: Foods Omitted and Substitutions

Please list specific food(s) to be omitted and food(s) that may be substituted. You may attach an additional sheet if necessary.

Omitted Foods	**Substitutions**
_____	_____
_____	_____
_____	_____
_____	_____

Indicate Length of Time Special Dietary Accommodations will be required

☐ Ongoing ☐ Temporary Start Date: _____ End Date: _____

I certify that the above named individual's needs special dietary accommodations as described above, due to the individual's food allergies and/or medical conditions.

Licensed Physician Signature _____ **Date:** _____

FARE Food Allergy Research & Education

FOOD ALLERGY & ANAPHYLAXIS EMERGENCY CARE PLAN

Name: _____ D.O.B.: _____

Allergy to: _____

Weight: _____ lbs. Asthma: ☐ **Yes (higher risk for a severe reaction)** ☐ **No**

NOTE: Do not depend on antihistamines or inhalers (bronchodilators) to treat a severe reaction. USE EPINEPHRINE.

Extremely reactive to the following allergens: _____

THEREFORE:

☐ If checked, give epinephrine immediately if the allergen was LIKELY eaten, for ANY symptoms.

☐ If checked, give epinephrine immediately if the allergen was DEFINITELY eaten, even if no symptoms are apparent.

FOR **ANY** OF THE FOLLOWING:

SEVERE SYMPTOMS



LUNG
Shortness of breath, wheezing, repetitive cough



HEART
Pale or bluish skin, faintness, weak pulse, dizziness



THROAT
Tight or hoarse throat, trouble breathing or swallowing



MOUTH
Significant swelling of the tongue or lips



SKIN
Many hives over body, widespread redness



GUT
Repetitive vomiting, severe diarrhea



OTHER
Feeling something bad is about to happen, anxiety, confusion

OR A COMBINATION of symptoms from different body areas.

1. **INJECT EPINEPHRINE IMMEDIATELY.**
2. **Call 911.** Tell emergency dispatcher the person is having anaphylaxis and may need epinephrine when emergency responders arrive.

- Consider giving additional medications following epinephrine:
  - » Antihistamine
  - » Inhaler (bronchodilator) if wheezing
- Lay the person flat, raise legs and keep warm. If breathing is difficult or they are vomiting, let them sit up or lie on their side.
- If symptoms do not improve, or symptoms return, more doses of epinephrine can be given about 5 minutes or more after the last dose.
- Alert emergency contacts.
- Transport patient to ER, even if symptoms resolve. Patient should remain in ER for at least 4 hours because symptoms may return.

MILD SYMPTOMS



NOSE
Itchy or runny nose, sneezing



MOUTH
Itchy mouth



SKIN
A few hives, mild itch



GUT
Mild nausea or discomfort

FOR **MILD SYMPTOMS** FROM **MORE THAN ONE** SYSTEM AREA, GIVE EPINEPHRINE.

FOR **MILD SYMPTOMS** FROM **A SINGLE SYSTEM** AREA, FOLLOW THE DIRECTIONS BELOW:

1. Antihistamines may be given, if ordered by a healthcare provider.
2. Stay with the person; alert emergency contacts.
3. Watch closely for changes. If symptoms worsen, give epinephrine.

MEDICATIONS/DOSES

Epinephrine Brand or Generic: _____

Epinephrine Dose: ☐ 0.1 mg IM ☐ 0.15 mg IM ☐ 0.3 mg IM

Antihistamine Brand or Generic: _____

Antihistamine Dose: _____

Other (e.g., inhaler-bronchodilator if wheezing): _____

_____

PATIENT OR PARENT/GUARDIAN AUTHORIZATION SIGNATURE DATE PHYSICIAN/HCP AUTHORIZATION SIGNATURE DATE

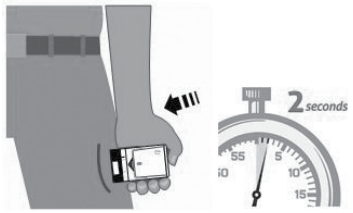
FORM PROVIDED COURTESY OF FOOD ALLERGY RESEARCH & EDUCATION (FARE) (FOODALLERGY.ORG) 5/2018

FOOD ALLERGY & ANAPHYLAXIS EMERGENCY CARE PLAN

FARE
Food Allergy Research & Education

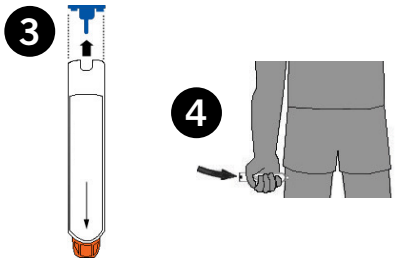
HOW TO USE AUVI-Q® (EPINEPRHINE INJECTION, USP), KALEO

1. Remove Auvi-Q from the outer case.
2. Pull off red safety guard.
3. Place black end of Auvi-Q against the middle of the outer thigh.
4. Press firmly until you hear a click and hiss sound, and hold in place for 2 seconds.
5. Call 911 and get emergency medical help right away.



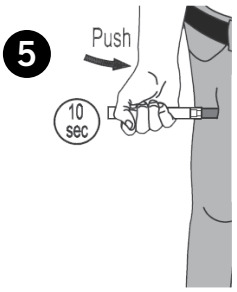
HOW TO USE EPIPEN® AND EPIPEN JR® (EPINEPHRINE) AUTO-INJECTOR AND EPINEPHRINE INJECTION (AUTHORIZED GENERIC OF EPIPEN®), USP AUTO-INJECTOR, MYLAN AUTO-INJECTOR, MYLAN

1. Remove the EpiPen® or EpiPen Jr® Auto-Injector from the clear carrier tube.
2. Grasp the auto-injector in your fist with the orange tip (needle end) pointing downward.
3. With your other hand, remove the blue safety release by pulling straight up.
4. Swing and push the auto-injector firmly into the middle of the outer thigh until it 'clicks'.
5. Hold firmly in place for 3 seconds (count slowly 1, 2, 3).
6. Remove and massage the injection area for 10 seconds.
7. Call 911 and get emergency medical help right away.



HOW TO USE IMPAX EPINEPHRINE INJECTION (AUTHORIZED GENERIC OF ADRENACLICK®), USP AUTO-INJECTOR, IMPAX LABORATORIES

1. Remove epinephrine auto-injector from its protective carrying case.
2. Pull off both blue end caps: you will now see a red tip.
3. Grasp the auto-injector in your fist with the red tip pointing downward.
4. Put the red tip against the middle of the outer thigh at a 90-degree angle, perpendicular to the thigh.
5. Press down hard and hold firmly against the thigh for approximately 10 seconds.
6. Remove and massage the area for 10 seconds.
7. Call 911 and get emergency medical help right away.



HOW TO USE TEVA'S GENERIC EPIPEN® (EPINEPHRINE INJECTION, USP) AUTO-INJECTOR, TEVA PHARMACEUTICAL INDUSTRIES

1. Quickly twist the yellow or green cap off of the auto-injector in the direction of the "twist arrow" to remove it.
2. Grasp the auto-injector in your fist with the orange tip (needle end) pointing downward.
3. With your other hand, pull off the blue safety release.
4. Place the orange tip against the middle of the outer thigh (upper leg) at a right angle (perpendicular) to the thigh.
5. Swing and push the auto-injector firmly into the middle of the outer thigh until it 'clicks'.
6. Hold firmly in place for 3 seconds (count slowly 1, 2, 3).
7. Remove and massage the injection area for 10 seconds.
8. Call 911 and get emergency medical help right away.



ADMINISTRATION AND SAFETY INFORMATION FOR ALL AUTO-INJECTORS:

1. Do not put your thumb, fingers or hand over the tip of the auto-injector or inject into any body part other than mid-outer thigh. In case of accidental injection, go immediately to the nearest emergency room.
2. If administering to a young child, hold their leg firmly in place before and during injection to prevent injuries.
3. Epinephrine can be injected through clothing if needed.
4. Call 911 immediately after injection.

OTHER DIRECTIONS/INFORMATION (may self-carry epinephrine, may self-administer epinephrine, etc.)**:**

Treat the person before calling emergency contacts. The first signs of a reaction can be mild, but symptoms can worsen quickly.

EMERGENCY CONTACTS — CALL 911

RESCUE SQUAD: _____

DOCTOR: _____ PHONE: _____

PARENT/GUARDIAN: _____ PHONE: _____

OTHER EMERGENCY CONTACTS

NAME/RELATIONSHIP: _____ PHONE: _____

NAME/RELATIONSHIP: _____ PHONE: _____

NAME/RELATIONSHIP: _____ PHONE: _____

FORM PROVIDED COURTESY OF FOOD ALLERGY RESEARCH & EDUCATION (FARE) (FOODALLERGY.ORG) 1/2019

EQUIPMENT: DESIGNATED FOR ALLERGENS

In order to provide allergen and gluten aware meals, the following equipment and utensils may need to be utilized at the site depending on menu requirements. Please evaluate your kitchen area before purchasing any of the commercial equipment. Top recommendations are the designated purple allergen food preparation kits.

Recommended

- Thermometer
- Allergen Cooking Kit
- Allergen Food Prep Kit
- Designated Knife Rack
- Designated Colander
- Designated Mixer Container
- Designated Food Processor Container
- Storage Containers
- Designated Pop-up Toaster for GF bread
- Commercial Microwave Oven
- Compact Refrigerator (if required)
- Designated stove top and pots & pans
- Designated cart (labeled or color coded)
- Designated speed rack for prepped foods
- Designated can opener
- Cutting boards – purple replace white, need designated green and red for allergen-free items

Optional

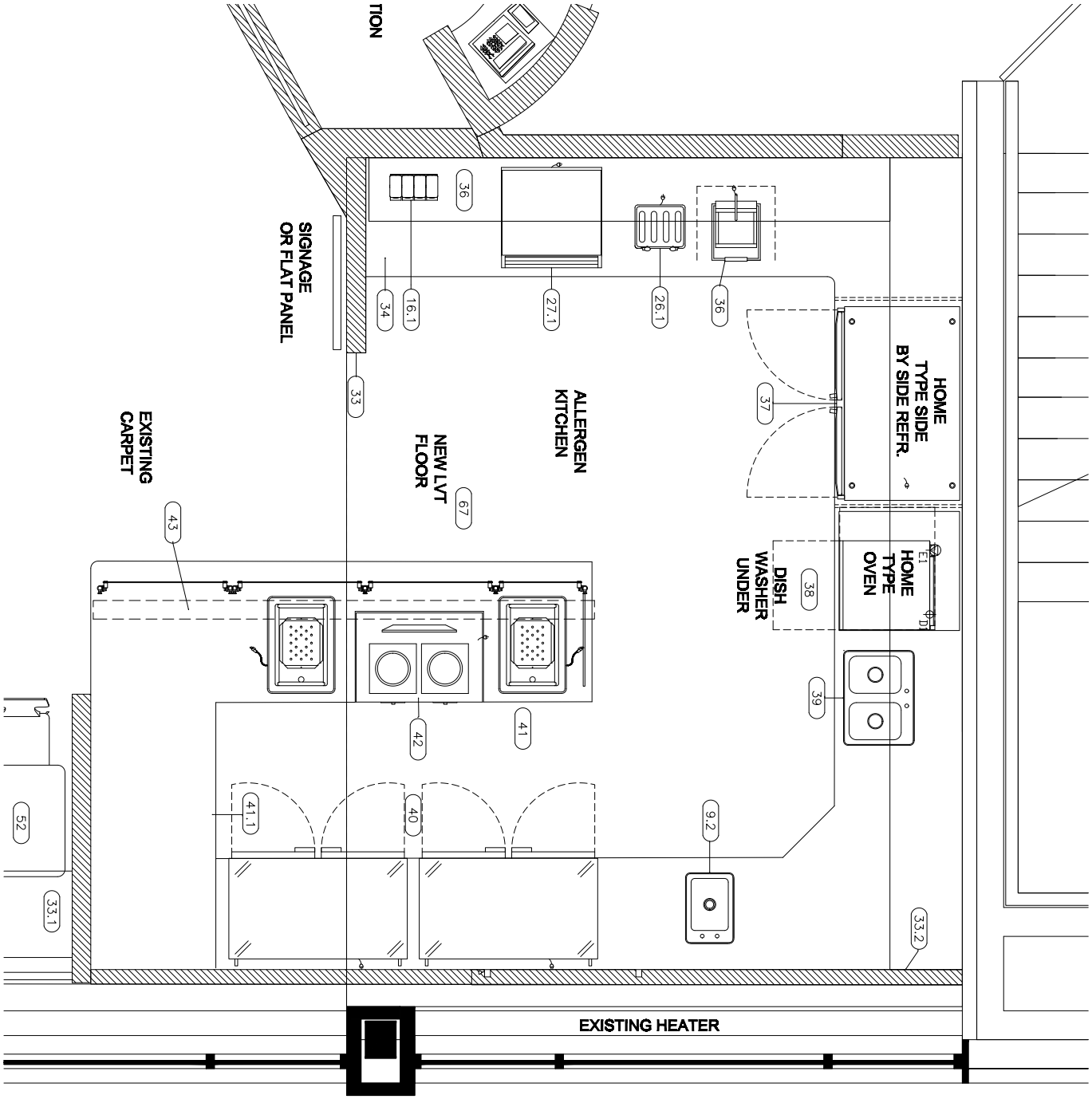
- Countertop Steamer
- Designated convections -or- combi oven
- Countertop fryer
- Allergen Baking Kit
- Allergen Pizza Kit
- Designated Pop-Up Toaster for GF Bread

Please purchase from approved smallware vendors.

The information in this manual has been obtained from various sources. Guidance from sections 2.102.11 and 2-103.11 of the FDA Food Code 2022 were used to support policies around allergen and gluten awareness and training. States and/or local authorities may have more stringent or different requirements. Version | 061523

FACILITY: ALLERGEN AWARE DESIGN

When evaluating kitchens and possible redesign, it may be feasible to include an allergen and gluten aware kitchen design. Below you will find a sample layout. Due to the continuous flow of food from delivery to service, the kitchens are considered allergen and gluten aware. Consider traffic pattern and ventilation, as well as proximity to high-risk areas, such as stand mixers.



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ALLERGEN & GLUTEN GLOSSARY

On the following pages you will find additional allergen terms and a list of items containing gluten. The information provided may be helpful when evaluating ingredient labels.

Note: The Allergen Glossary is not all inclusive. Always be aware of possible allergen changes.

Tree Nuts

Avoid foods that contain these ingredients:

- Almond
- Artificial nuts
- Beech nut
- Brazil nut
- Butternut
- Cashew
- Chestnut
- Chinquapin nut
- Coconut
- Filbert/hazelnut
- Gianduja
- Ginkgo nut
- Hickory nut
- Litchi/lychee nut
- Macadamia nut
- Marzipan
- Nangai nut
- Natural nut extracts
- Nut meal, meat or paste
- Nut oils
- Pecan
- Pesto
- Pili nut
- Pinon nut
- Pistachio
- Praline
- Walnut

Tree Nuts may be found in:

- Walnut and black walnut hull extract (flavoring)
- Natural nut extract
- Nut distillates/alcoholic extracts
- Nut oils (walnut oil, almond oil)
- Mortadella

Coconut is the seed of a drupaceous fruit; FDA identifies coconut as a tree nut.

Peanuts

Avoid foods that contain these ingredients:

- Artificial nuts
- Arachis
- Arachis hypogaea
- Beer nuts
- Cold pressed, expeller pressed, extruded peanut oil (Also may be called Arachic oil)
- Goobers
- Ground nuts
- Mixed nuts
- Monkey nuts
- Nut pieces
- Nut meal, Nutmeat
- Peanut butter
- Peanut flour
- Peanut paste
- Peanut sauce, peanut syrup
- Spanish peanuts
- Virgina peanuts
- Hydrolyzed peanut protein
- Mandelonas

Peanuts may be found in:

- African, Asian & Mexican dishes
- Baked goods
- Candies
- Chili
- Egg rolls
- Enchilada sauce
- Hydrolyzed plant protein, hydrolyzed vegetable protein
- Marzipan
- Mole sauce
- Nougat

Lupin or Lupine may cause a cross-reaction with peanuts.

Source www.foodallergy.org | kidswithfoodallergies.org

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Crustacean Shellfish

Avoid foods that contain these ingredients:

- Barnacle
- Crab
- Crawfish (crawdad, crayfish, ecrevisse)
- Krill
- Lobster (langouste, langoustine, Moreton bay bugs, scampi, tomalley)
- Prawns
- Shrimp (crevette, scampi)

Crustacean shellfish may be found in:

- Bouillabaisse
- Cuttlefish ink
- Glucosamine
- Fish stock
- Seafood flavoring (crab or clam extract)
- Surimi

Mollusks are not considered major allergen under food labeling laws, but may be avoided by persons with a shellfish allergy.

- Abalone
- Clams (cherrystone, geoduck, littleneck, pismo, quahog)
- Cockle
- Cuttlefish
- Limpet
- Mussels
- Octopus
- Oysters
- Periwinkle
- Scallops
- Sea cucumber
- Sea urchin
- Snails (escargot)
- Squid (calamari)
- Whelk (turban shell)

Soy

Avoid foods that contain these ingredients:

- Edamame
- Miso
- Natto
- Soy (soy albumin, soy cheese, soy fiber, soy flour, soy grits, soy ice cream, soy milk, soy sprout, soy yogurt)
- Soya
- Soybean (curd, granules, flour, paste)
- Soy protein (concentrate, hydrolyzed, isolate)
- Shoyu
- Surimi
- Soy sauce
- Tamari
- Bean curd
- Kinako (roasted soybean flour)
- Koya dofu (freeze dried tofu)
- Okara (soy pulp)
- Supro (brand name for a soy protein isolate)
- Yuba (bean curd)
- Tempeh
- Textured vegetable protein (TVP)
- Textured soy flour (TSF)
- Textured soy protein (TSP)
- Tofu (Yaki-dofu, grilled tofu)

Soy may be found in:

- Asian cuisine
- Vegetable broth
- Vegetable gum
- Vegetable starch

Highly refined soybean oil is exempt from labeling per the FDA.

Most people allergic to soybeans do not react adversely to soy lecithin.

Source www.foodallergy.org | https://farrp.unl.edu/soy-lecithin

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Egg

Avoid foods that contain these ingredients:

- Albumin (albumen)
- Egg (dried, powdered, solids, white, yolk)
- Eggnog
- Egg wash
- Globulin
- Livetin
- Lysozyme
- Mayonnaise
- Meringue (meringue powder)
- Simplesse
- Surimi
- Vitellin (Apovitellin)
- Also avoid eggs from duck, turkey, goose, quail as they can be cross-reactive

Egg may be found in:

- Baked goods
- Breaded items
- Drink foam (specialty coffee or alcoholic)
- Egg substitutes
- Fried rice
- Ice cream
- Lecithin
- Marzipan
- Marshmallows
- Meatloaf or meatballs
- Nougat
- Pasta

Milk

Avoid foods that contain these ingredients:

- Acidophilus milk
- Butter, butter fat, butter oil, butter acid, butter esters, butter solids
- Buttermilk
- Casein in all forms (hydrolyzed, rennet, hydrolysate)
- Caseinates (ammonium, calcium, iron, magnesium, potassium, sodium, zinc)
- Cheese
- Cottage cheese
- Cream
- Curds
- Custard
- Diacetyl
- Ghee
- Half and half
- Lactalbumin
- Lactoferrin
- Lactose
- Lactulose
- Milk (in all forms – condensed, derivative, dry, evaporated, low-fat, malted, milkfat, nonfat, powder, protein, skimmed solids, whole)
    - Also avoid milk from domestic animals, including goat and sheep.
- Milk protein hydrolysate
- Pudding
- Recaldent
- Sour cream, sour cream solids
- Sour milk solids
- Tagatose
- Whey (in all forms, Delactosed, demineralized, sweet, powder, protein concentrate, protein hydrolysate)
- Whipped topping
- Natural butter flavor
- Yogurt

Milk may be found in:

- Artificial butter flavor
- Baked goods
- Caramel
- Chocolate
- Lactic acid starter
- Culture and other bacterial cultures
- Luncheon meat
- Margarine
- Nisin
- Non-dairy products
- Nougat

Source www.foodallergy.org

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Fish

Fish may be found in:

- Barbeque sauce
- Bouillabaisse
- Caesar salad
- Caviar
- Deep fried items
- Fish flavoring
- Fish flour
- Fish fume
- Fish gelatin (kosher gelatin)
- Fish oil
- Fish sauce (has various names)
- Fish stock
- Fishmeal
- Anchovy
- Roe
- Salad dressing
- Seafood flavoring
- Shark cartilage
- Shark fin
- Surimi
- Sushi and sashimi
- Worcestershire sauce

Wheat

Avoid foods that contain these ingredients:

- Bread crumbs
- Bulgur
- Cereal extract
- Club wheat
- Couscous
- Cracker meal
- Durum
- Einkorn
- Emmer
- Farina
- Farro
- Flour (all purpose, bread, cake, durum, enriched, graham, high gluten, high protein, pastry, self-rising, soft wheat, steel ground, stone ground, whole wheat)
- Freekah
- Khorasan wheat (Kamut)
- Malt and malt extract
- Matzo (matzo meal (matzoh, matzah, matza
- Seitan
- Semolina
- Spelt
- Sprouted wheat
- Triticale
- Vital wheat gluten
- Wheat (bran, durum, germ, gluten, grass, malt, sprouts, starch)
- Wheat bran hydrolysate
- Wheat germ oil
- Wheat grass
- Wheat protein isolate
- Whole wheat berries

Wheat may be found in:

- Glucose syrup
- Oats
- Soy sauce
- Starch (gelatinized starch, modified starch, modified food starch, vegetable starch)
- Surimi

Source www.foodallergy.org

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Gluten is Present in the Grains

- Wheat
  - Wheatberries
  - Durum
  - Emmer
  - Semolina
  - Spelt
  - Farina
  - Farro
  - Graham
  - Kamut Khorasan wheat
  - Einkorn wheat
- Rye
- Barley
- Triticale
- Malt
- Malted barley flour
- Malted milk
- Malt extract/syrup/flavoring
- Malt vinegar
- Brewer's Yeast
- Wheat Starch

Source www.celiac.org

Gluten-free Grains Include

- Buckwheat
- Quinoa
- Corn
- Rice
- Teff
- Sorghum
- Potato
- Millet
- Arrowroot
- Chia
- Soy
- Tapioca
- Yucca
- Cassava

Oats are considered to be cross-contaminated with gluten unless certified gluten free. Reference article explaining gluten free oats: https://gfjules.com/oatmeal-gluten-free/

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Sesame

Avoid foods that contain these ingredients:

- Sesame Salt (Gomasio)
- Halvah (candy made from sesame paste)
- Sesame Flour
- Sesame Oil
- Sesame paste
- Sesame seeds
- Sesamol (phenol in sesame seed)
- Tahini

Sesame may also be called:

- Anjonjoli
- Benne, benne seed
- Gingelly and gingelly oil
- Sim sim
- Til
- Teel
- Sesamum indicum

Sesame may be found in:

- Asian cuisines
- Baked goods (hamburger buns, bread sticks, rolls, bagels)
- Bread crumbs
- Cereals
- Chips (bagel chips or tortilla chips)
- Crackers (sesame snaps or melba toast)
- Dipping sauces (hummus, tahini or baba ghanoush)
- Falafel
- Goma-dofu (Japanese dessert)
- Pasteli (Greek dessert)
- Hummus
- Seasoned rice, noodles, risotto, stews and stir fry
- Margarine
- Processed meats and sausage
- Protein and energy bars
- Snack foods (pretzels, candy, snack mixes, rice cakes)
- Soups
- Sushi
- Tempeh
- Vegetarian burgers

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Allergen and Gluten Aware Guideline for Answering Audit Questions

	Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
Introduction: Unit has reviewed the following: ___ Allergen and Gluten Aware Introduction ____Food Allergen and Gluten Symbols ____ Terminology ___ Quick Reference Guide ____Signs and Symptoms ____ Allergic Reaction Response Poster and Posted						
A Management and any person-in-charge (e.g. district managers, director of operations, general managers, location supervisors, production managers, chefs, assistant managers) and receiver have completed the allergen and gluten aware training requirements. (Policy 1.1)						
1 The unit has met all training requirements including but not limited to completion of an ANAB course within 30 days of hire or as required by applicable health code (Reference Policy 1.1 Training) and certificates are available? Courses include ServSafe Allergen or AllerTrain as assigned by segment.						
2 Assigned individuals have completed Elior North America SAFE Allergen Training with documentation on file?						
B Key personnel (culinary) have been identified to assist in the preparation and service of allergen and gluten aware meals and have completed the training requirements (Policy 1.1).						
1 The unit has identified at least 1-2 culinary team member (s) per shift to be responsible for the preparation and service of allergen and gluten aware meals?						
2 The unit has set up trainings for identified team members to include but not limited to Basic Food Safety and Allergen Training, on-site Allergen and Gluten Awareness Training, and Elior North America Safe Allergen Training?						
3 The unit has completed the required annual/semi-annual site allergen and gluten training as required by the client or contract with documentation of such trainings?						
C Roles and responsibilities have been reviewed with team members as outlined in Policy 1.2.						
1 The following team members have reviewed their roles and responsibilities as it relates to the Allergen and Gluten Aware Program? ___Site Managers/Person-in-Charge ___ Back-of-the-House Team Members ___Front-of-the-House Team Members ___Go-To Team Members ____Receivers						
2 In the instance where team members complete combination jobs, the team members have reviewed the overlapping roles and responsibilities?						
D A process is in place for training of new team members involved in food preparation and service and documented when completed (Policy 1.1).						
1 The unit has in place training for **NEW** team members onboarding throughout the year who will be involved with the preparation and service of allergen and gluten aware meals?						
2 The training for new team members includes but is not limited to Basic Food Safety and Allergen Training, on-site Allergen and Gluten Awareness Training, and Elior North America Safe Allergen Training and with documentation on file?						

Allergen and Gluten Aware Guideline for Answering Audit Questions

	Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
3 The unit has in place a training program for individuals who may **CHANGE** job positions in production throughout the year?						
4 The trainings include on-site Allergen and Gluten Awareness Training, Elior North America SAFE Allergen Training and review of specific allergen and gluten aware menus and recipes and is documented?						
E Key personnel (Go-To team members) are identified to answer any questions a customer may have regarding meal preparation and allergen and gluten aware compliance (Policy 1.3).						
1 The Go-To team members for each shift have been identified?						
2 The Go-To team members have met all training requirements including but not limited to completion of an ANAB course within 30 days of hire or as required by applicable health code (Reference Policy 1.1 Training) and certificates are available? Courses include ServSafe Allergen or AllerTrain as assigned by segment.						
3 Assigned individuals have completed Elior North America SAFE Allergen Training with documatation on file?						
4 The Go-To team understands roles and responsibilities including the following: ____ Consulting with culinary team regarding substitutions and cross-contact ____ Discuss allergen and gluten needs with guests ____Comparing the identified allergen against ingredient labels on the original packaging/distributor information ____ Understands if unable to determine (e.g. chef has left) whether the product contains the allergen or gluten their responsibility includes informing the guest that they cannot confirm if the requested menu item is allergen or gluten aware.						
F For those sites where a medical order may be required (e.g. healthcare, school location, corrections): a system is in place to receive medical orders from a licensed practician for customers requiring allergen or gluten aware meals. (Policy 1.19)						
1 Are you receiving a medical diet order or communication from a licensed practician (e.g. physician, nurse practitioner, nurse, registered dietitian at your unit? If yes, then proceed to G. If no, proceed to #2 and #3.						
2 If not, reach out to the appropriate individuals on campus or at your site (e.g. Campus Health/Wellness Center, Nursing Staff, Registered Dietitian) to determine how you will be receiving medical diet orders for allergies, celiac disease or gluten sensitivities. (A sample medical diet order is available in the Allergen and Gluten Aware Appendix. However, it is recommended you utilize the facility form if available.)						
3 Do you have a system in place to ensure all orders remain confidential and you are following Elior NA HIPPA Guidelines? (File under lock and key. Do not provide access to employees.) In the case of electronic data (e.g. schools/universities, medical facilities) ensure the privacy of the point-of sale (cash registers at schools) information and or computer information.						

Allergen and Gluten Aware Guideline for Answering Audit Questions

	Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
G Menus and standardized recipes with allergen and gluten information are a requirement for the food preparation staff to utilize. (Reference Policy 1.9, 1.10, 1.11, 1.12)						
1 The unit serving Allergen and Gluten Aware meals has planned standard menus available for team members to utilize?						
2 The planned menus have recipes, product information and a source of allergen and gluten information available if a guest inquires?						
3 If a unit does not have the allergen and gluten information for the recipes or menus, the manager has contacted the unit assigned support registered dietitian for assistance and/or completed and had verified the Allergen and Gluten Matrix for Manual Process (Policy 1.11)?						
4 The unit has allergen and gluten aware menus written and printed for the guests who require accommodations and these are available for team members to utilize and a copy of each specific menu is placed on file after production along with indicating if any substitutions or changes to the menu were made?						
5 The unit has a process in place to identify product/recipe substitutions on specific allergen and gluten guest menus and the changes are verified by qualified individuals with initials and filed accordingly after production and service?						
6 The unit has standardized recipes available and these are utilized by the staff for all food production?						
7 Production staff are required to adhere to recipes unless there is a production substitution and it is approved by the site manager/chef and/or designated team member?						
8 The culinary/production team members understand that no changes can be made to the recipes including spices, garnishes, etc.?						
H Allergen ingredient lists and labels are available for the customer (Policy 1.18).						
1 The unit has access to allergen and gluten ingredient lists and labels for the guests?						
2 In the case where the unit does not have access to the allergen and gluten lists and labels for guests, the manager has contacted the unit assigned dietitian to obtain information and/or to be aware of who to contact for information?						
I Units purchase food products as required by the company and ensure substitutions are approved by manager/chef (Policy 1.5).						
1 The unit has a process in place to ensure the appropriate food products are purchased adhering to product information?						
2 The unit has a process in place to identify food product substitutions?						
3 The back-of-the house and front-of-the house team members understand if food product substitutions are received in the unit, approval for use must be provided by the manager/chef prior to utilizing in a recipe?						

Allergen and Gluten Aware Guideline for Answering Audit Questions

	Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
J Food storage protocols are in place to permit separate storage for allergen and gluten aware equipment, ingredients and food to minimize chance of cross-contact. (Policy 1.6)						
1 The unit has evaluated storage areas and provided a designated space for allergen-free and gluten-free foods? If no, proceed to #2, 3, and 4 below.						
2 Since a designated space is not available, a process of labeling/marking has been implemented to identify which shelves/storage areas are for allergen-free and gluten-free products?						
3 The unit has stored products containing allergens and gluten on bottom shelves (e.g. pasta below rice)?						
4 The unit has considered and is capable of storing higher risk allergen foods, such as nut oils, nuts, and peanut butter in a designated area?						
5 The unit has in place a designated storage area for designated equipment and/or understands the correct protocol for washing, rinsing and sanitizing equipment prior to allergen and gluten aware food preparation?						
K The facility is designed in a manner that allows the avoidance of cross-contact.						
1 The facility has been evaluated to determine that it is designed to allow for the avoidance of cross-contact? If no, proceed to Question L.						
L If no to Question K, processes are in place for cleaning and sanitizing shared production, storage, equipment, and service areas to avoid and/or minimize cross contact.						
M Designated equipment has been purchased and/or identified and is in use to ensure compliance of proper allergen and gluten aware food preparation and minimize chance of cross-contact. (Policy 1.13, 1.14, Page 68)						
1 The unit is utilizing designated cutting boards, knives, mixers, bowls, pots, pans, griddles, and other utensils? If compliant, proceed to #3.						
2 If not compliant, a process is in place to thoroughly wash, rinse, and sanitize equipment (Policy 1.8 Allergen and Gluten Cleaning and Sanitizing) prior to allergen and gluten aware food preparation?						
3 The team members understand a shared griddle or pots, pans, skillets, etc. with carbonized or burnt food residues should not be utilized to prepare allergen and gluten aware foods?						
4 The unit has dedicated service ware for use in serving allergen and gluten aware foods?						
5 The unit has reviewed the policy of 1.13 Back-of-the-House: Preparing and Cooking Allergen & Gluten Aware Foods regarding equipment and/or page 68 for Recommended Designated Equipment and other Optional suggestions and addressed according to their unit accommodations and capabilities?						

Allergen and Gluten Aware Guideline for Answering Audit Questions

		Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
N	If a separate area for allergen safe preparation cannot be designated, then a timeframe for allergen safe food preparation ONLY must be set and complied with (Policy						
1	The unit has evaluated their capabilities in preparing allergen and gluten aware meals and determined that they do have a designated space for preparation? If no, proceed to #2.						
2	The unit has designated a specific time that allergen and gluten aware meals will be prepared to minimize cross-contact? (Note: This can be before the production start of other meals and the products can be stored appropriately until needed for service.)						
O	Allergen cleaning and personal hygiene procedures have been reviewed with staff and the trainings are documented.						
1	The unit has reviewed Policy 1.7 Allergen and Gluten Hygiene (pg. 25) and the employees understand that to prevent **CROSS-CONTACT** they must change gloves, aprons, hair and beard covers prior to preparing allergen and gluten aware meals?						
2	The team members understand that when going from the preparation of one food item to another, team members shall wash their hands following proper handwashing procedures from the Elior North America Food Safety Manual?						
3	The unit has reviewed Policy 1.8 Allergen and Gluten Cleaning and Sanitizing (pg. 26) and documented the trainings with a sign-in and out sheet: _____ Cleaning and Sanitizing Steps 1-5						
4	The unit has trained the team members and they understand the following - **NEVER** share cleaning materials for tables where guests eat and locations where allergen and gluten aware food is prepared and served? (See attached trainings.)						
P	Back-of-the House and Front-of-the House: Staff understand how to communicate with individuals requiring allergen and gluten aware meals. (Policy 1.13, 1.14, 1.15, 1.18)						
1	Team members must take proper measures to ensure that we have open lines of communication with our guests regarding allergen and gluten information. The unit has established a process whereby management/chef/Go-To team member/registered dietitian will meet with the guest/guardian and review menus and/or open lines of communication regarding allergen and gluten aware menu requirements.						
2	The unit has allergen and gluten aware signage properly displayed at the site (as applicable)?						
3	The Manager/Chef/ Go-To team member is prepared to have a conversation about the menu with the guests or has contacted the appropriate registered dietitian to connect with the guests?						
4	The unit has reviewed and verified the accuracy of the menu digital displays and posted menus prior to service?						
5	The unit has a system in place to label Grab and Go foods (defined as foods that are pre-packaged) for the guest?						
6	If an organization utilizes a pamphlet, booklet or other marketing materials to provide allergen and gluten information for a specific menu and time frame, a system is in place to notify the guests of allergen/gluten changes in food product/ingredients. (This may be applicable to Congregate feeding, K-12 and other menus where allegens or gluten are identified via printed materials.)						

Allergen and Gluten Aware Guideline for Answering Audit Questions

		Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
Q	Self-service: An ordering system is in place for guests that request a similar menu item be prepared in the back-of-the house. (Policy 1.14, 1.15, 1.18, Allergen Notice Sign)						
1	The unit has a system in place to ensure team members who are preparing food for self-service areas will communicate with the Go-To team member and staff to ensure no menu items or product substitutions have been made prior to set-up?						
2	The unit has in place a process in which the Go-To team member and individuals preparing the self-service food will ensure that extra menu products (as applicable) are available to prepare in the						
3	The unit has the appropriate Allergen and Gluten Aware signage posted in the self-service areas (e.g. Self-Service Sign, Allergen Notice Sign, Allergen Disclaimer)?						
4	The unit ensures that all menu items in self-service areas are set-up to group like allergen and						
5	Self-service food items are clearly labeled?						
6	Separate utensils are available for each item?						
7	Containers are not overfilled and the self-service areas are kept free of spills and debris?						
8	Employees follow allergen and gluten aware protocols for hygiene and cleaning (Policy 1.8) in the self-service areas?						
9	The unit has combined the peanuts and tree nuts into one central location instead of being available at the ice cream and salad bars? (Note: Please consider this process to aid in minimizing cross-contact.)						
R	A process is in place where designated team members meet with event planners to determine if allergen/gluten aware meals are required? (Policy 1.16)						
S	A process is in place to train new catering staff for the various catering functions regarding food handling and the communication of allergen/gluten information. (Policy 1.16)						
1	The catering staff understands that the identified Go-To Team members will inform them of separate meals or accommodations made for guests?						
2	Catering staff has been trained on the appropriate service of meals to minimize CROSS-CONTACT: Hygiene and Cleaning and Sanitizing Policy 1.7 and 1.8 respectively?						
T	The allergen/gluten disclaimer is posted on the food truck and a Go-To team member has been identified to answer any allergen/gluten inquiries? (Policy 1.17)						

Allergen and Gluten Aware Guideline for Answering Audit Questions

	Compliant	Non-Compliant	Owner	Date Started	Date Completed	N/A
U Separate, designated dining areas are identified and provided for individuals with food allergies if required by school or university. (If not, inform client of the risks and benefits of non-segregated dining services.)						
1 The unit has identified the designated dining areas for individuals with food allergies as requested by the school/university?						
2 In the case, where there are designated eating areas, the team members understand the proper allergen and gluten aware cleaning and sanitizing policies when cleaning dining areas (Reference						
3 If there are no allergen and gluten aware designated dining areas, the client has been informed of the risks and benefits of non-segregated dining areas?						
4 If the unit is required to clean and sanitize tables when a guest with allergen/gluten requirements is dining, (there is no designated area), the team members are trained in the appropriate cleaning and sanitizing techniques? (Note: You cannot remove allergen proteins by sanitizing only.) Policy 1.8						
V In the event of an adverse reaction, personnel are trained to follow site protocol and call 911 in case of emergencies (pg. 11 & 12).						
1 The unit understands the site protocol for response to adverse allergen/gluten reactions and has a copy of the site process in hand?						
2 The team members have been trained regarding the site process in the case of an allergen/gluten reaction and the training is documented?						
3 A process is in place to ensure that NEW team members understand the site process regarding allergen/gluten reaction and the training is documented?						
W Management staff/person-in-charge knows the reporting process and has the forms available for Customer Injury/Allergic Reaction? (Located in the Allergen and Gluten Aware Appendix or Crisis Manual)						
X The allergen flow chart has been posted at the site for team members? (Policy 1.4)						
Y The site has allergen and gluten policies and procedures available and in place to ensure compliance in preparing allergen and gluten aware meals? (Policy 1.1-1.20)						

ADDITIONAL RESOURCES

Elior North America Food Safety Manual

Elior North America SAFE Training

ServSafe Allergen Training

AllerTrain Courses

Food Allergy and Research Education (FARE)

- Pilot Guidelines for Managing Food Allergies in Higher Education
- Restaurant Legislation Tool Kit
- FARE Resources
  - How to Read a Label for a Sesame-Free Diet
  - Food Allergies: Frequently Asked Questions
  - Understanding Food Labels
  - Tips for Avoiding Your Allergen
  - How to Avoid Cross-Contact
  - Dining Out with Food Allergies
  - Preparing Others to Care for Children with Food Allergies

Gluten Free Resource Education Awareness Training (beyondceliac.org)

Centers for Disease Control and Prevention. Voluntary Guidelines for Managing Food Allergies in Schools Early Care and Education Programs. Washington, DC; Us Department of Health and Human Services; 2013

FDA Food Code 2017

U.S. Food & Drug Administration - FDA News Release, November 10, 2020

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MANUAL CHANGES

The following lists the changes made to each version.

Version 061523

- Page 14 – Allergen and Gluten Aware Process
- Page 15–16 – Allergen and Gluten Aware Site Audit – new audit form and submission process
- Changed shellfish to crustacean shellfish:
  - Page 10 – Top 9 Major Food Allergens and Gluten Symbols
  - Page 31 – Allergen & Gluten Matrix for Manual Process
  - Page 32 – Allergen & Gluten Matrix for Manual Process (SAMPLE)
  - Page 38 – Policy 1.18 Communicating Allergens to Guests: Allergen Disclaimer sign
  - Page 58 – Allergen Disclaimer
  - Page 68 – Medical Order Form
  - Page 71 – Allergen and Gluten Glossary – Shellfish
- Page 63 – Updated allergic reaction definitions for significant/critical levels and media contact
- Page 75 – Allergen and Gluten Aware Guidelines for Answering Audit Questions – updates to align with new audit

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