



Allergy Policy Guidelines

This document expands on the points made in the AllerTrain™ and AllerTrain™ U training courses from MenuTrinfo® LLC. It is meant as an outline of suggestions for creating a “Gluten-Free and Food Allergen” policy for your establishment. Not every contingency that could occur is recorded below, nor is every listed item necessarily applicable to your situation. In no case should MenuTrinfo LLC be held accountable to guarantee any prevention or outcome in a food-item related incident as described in the suggested practices below.

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Why do you need a policy?

Your dining establishment, from convenience store deli, to sit-down restaurant, to college cafeteria, is intended not just to feed people but do so in a safe, reliable, and trustworthy manner. Success in this endeavor will generate not just repeat business, but expanded clientele. Beyond nutrition, dining is primarily a social activity. Statistically speaking, at least ten percent of all diners during your operating hours will have a variety of allergy, gluten, or food sensitivity issues. It's almost a guarantee that in a group of four to six people, one of them will have special dietary needs. Studies have shown that properly catering to this clientele can improve profit noticeably, in the range of 15%. The food-allergic community is also well-connected and vocal so your establishment's treatment of them will become well-known. Word-of-mouth advertising is still at play in the Internet age!

Ultimately, you have to decide if extra effort, from training to site rework, is worth it to you, be it financially, socially, and personally. Deciding to take no extra effort to accommodate special requests is also a valid stance, but does not remove the need for an explicit policy. It will be much shorter in this case, but still needs to be created.

No policy IS a policy

Your stance regarding the accommodation of special-needs diners is, by definition, your policy. Is it written down and clear enough? Is it maintained as necessary? Do all of your employees know about it, and can they explain it? Without that minimal effort, your default policy is CONFUSION. Greeters and servers will not know how to answer questions and will deliver conflicting information. Chefs and cooks will be prone to improvisation which can lead to substitutions with unintended consequences. Even non-food activities like bussing and cleaning can be affected. Customers will get an uneven experience at best, and unsettling or unsafe at the worst.

Create a policy. Just do it. When? That's easy: right now. But where to start?

Disclaimers

A customer deserves to know your allergen and gluten stance as soon as possible. Signs in the window, signs at the wait stand, and announcements in the menu are good starting points. The greeting staff should be able to answer simple questions, even if it's to defer to the someone else. The server should be proactive about announcing your policy, which follows one of two general paths:

- “Does anyone have any allergies, celiac disease, or food preferences to declare? Our business is trained to handle your requests.”
- “By the way, our business makes no extra effort to address food allergies or celiac sufferers.”

Regardless of who you decide to be, your customers should be informed as soon as possible. Always be respectful of their wishes with respect to dietary requests, even if their wishes are not met and they leave your business. You want happy, healthy, safe, and returning business.

Training

Assuming that your choice is to adapt and serve the allergic and celiac population, your first step is training. It must be comprehensive, as multiple employees, or groups of employees, will have some type of interaction with the diner. If you are reading this document you have probably selected an AllerTrain™ class from MenuTrinfo® and we thank you for your choice. There are different levels of training for different levels of staff (ie, line worker versus kitchen manager).

The training must occur before any employee is allowed to interact with a diner or their food. While the certifications from MenuTrinfo® are good for several years, constant reminders of practices can keep the staff diligent at all times. A good way to enhance this diligence is the “AllerStar” monthly training poster program. Each month a key concept around food allergens, celiac disease, or intolerances is presented. Local staff can perform a quick refresh on the topic, each employee can sign off on the training, and the poster can be displayed in a prominent location. Contact MenuTrinfo® for more information about AllerStar.

Our training teaches that the key player in an establishment is the P.I.C. or “Person In Charge”. This person is designated during active business hours to be the coordinator for all allergic diners. Their responsibility is to insure the message does not get lost. When an allergic diner declares themselves, the PIC will insure the “Four R’s” are executed to insure dining safety:

1. Refer – the diner to the PIC who coordinates with other trained staff
2. Review – the diner’s situation in an experienced fashion, especially with kitchen staff
3. Remember – the outcome of kitchen investigation, including substitutions
4. Respond – to the diner to confirm expectations

A key part of preserving the message is doing all this against a written record, preferably on a familiar form. We call this the “Allergy Alert” and it’s discussed in detail in another document. Refer to the resources section of the course to retrieve that document. As with your policy, you’ll need to customize the Allergy Alert form to match your establishment. The result will be a repeatable and reliable document that will maximize your customer’s safety.

Your policy should include

- Training requirements
- Customized Allergy Alert form
- Extra educational aids (AllerStar and other posters and lookup cards from AllerTrain™)
- PIC selection
- Training refresh intervals
- Practice runs for allergy alert invocation (to prevent “WHERE ARE THE FORMS” panics)

Recipes

The recipes for all menu items and preps should be available in printed form. This is not just for regular kitchen use but in case the customer wants deep details. MenuTrinfo® also provides detailed nutritional analysis which can deliver not just allergen reports but “reverse lookup” of ingredients. Those reports can also fill a lot of gaps in questions from customers. These printouts should be considered “appendices” to your allergy policy and properly updated.

Accuracy

Recipes should be reviewed on a regular basis, and your policy should set that review period. Good trigger points are quarterly (time) or supply changes (events). Things to look for:

- Is everyone actually following the recipes?
- Changes “from above” which occur over time
- Changes that are being induced from substitute or replacement ingredients

Ingredient substitution

Substitutes happen all the time. Your normal supplier suddenly can't deliver, or switches their source vendor, or wants you to try an alternate ingredient. While neutral from a nutrition standpoint, a different ingredient can have a wildly different allergen or gluten profile. Any substitution must be communicated to all back-of-house staff, the corporate recipe manager, and the PIC. This must occur even on a short-term basis, even if daily!

Emergency Response

Your establishment can do everything perfectly so that no diner who declares their allergy beforehand suffers an incident. Remember that a significant number of FIRST-TIME allergy events occur away from home, possibly in your location! That's why a full allergy policy must include knowledge of the proper handling for anaphylaxis. Again, the AllerTrain™ series from MenuTrinfo® covers that in depth for multiple business types.

Epinephrine is the first medication that should be administered when treating anaphylaxis. Epinephrine reverses symptoms and allows time to seek additional care. Side effects from epinephrine may include rapid heart rate, jitteriness, weakness, paleness, and headache. Side effects are generally mild and go away within a few minutes.

Stock Epinephrine

Knowing the facts about administering epinephrine is essential because a mild reaction can suddenly become severe. In the past restaurants depended on diners carrying their own epinephrine auto-injector. In the future we may see more restaurants carrying devices in house. This “stock epinephrine” is similar to AED's and naloxone or Narcan kits that are becoming increasingly available.

In 2013, President Obama signed the School Access to Emergency **Epinephrine** Act into **law**. This federal **law** encourages states to implement policies requiring schools to **stock** undesignated **epinephrine** auto-injectors for use in emergencies.

FAACT, the Food Allergy Awareness Connection Team, [maintains a web page with details on every state's stance on stock epinephrine](#). As of this writing (April 2021) 33 states have passed “entity laws” which permits the venue to stock undesignated epinephrine in case of an anaphylactic emergency.