

## **POLICY AND PROCEDURES REGARDING ALLERGIES**

### **1. Notice Regarding Allergens**

- a. The College of Food Innovation & Technology (CFIT) and other colleges offering food or beverage related courses at Johnson & Wales University (“JWU”) use hundreds of foods and related products in its classrooms and laboratories, including, but not limited to, eggs, fish, milk (and other dairy products), nuts (peanuts and tree nuts), shellfish and other seafood, soybeans, spices, wheat, and other potential allergens, as well as cleaning supplies that may contain potential allergens (“Foods/Ingredients with Allergens” or “FIA”). Such uses include baking, cooking, preparing, and serving FIA and foods containing FIAs, and using cleaning products that may contain FIAs. JWU uses many FIAs, including the specific foods and items mentioned, very extensively throughout its required curriculum.
- b. Depending on the nature of an allergy, the allergy may be life-threatening or otherwise severe. Depending on the nature of an allergy, the allergy may or may not constitute a “disability” within the meaning of applicable law.
- c. All students enrolled at JWU are required to meet the essential academic functions of the courses or the educational programs of the college in which they are enrolled (including, but not limited to, active participation in classes and culinary labs) with or without academic adjustments. That includes being able actively to participate in classes and culinary labs that involve baking, cooking, preparing, and serving FIAs and beverages and foods containing FIAs, and cleaning using products that contain FIAs.
- d. CFIT and other programs that incorporate significant use of foods and beverages have minimized certain exposures that could trigger an allergic reaction by eliminating the requirement that students taste FIAs or directly touch FIAs without gloves. However, due to the nature of the programs, with extensive use of many FIAs and hands-on instruction and participation, the university cannot guarantee an allergen-free environment and cannot eliminate FIAs from its required curriculum. Nor can JWU prevent airborne ingestion of FIAs.

### **2. Student Responsibilities Regarding Allergies**

- a. Students with potentially life-threatening or otherwise serious allergies (e.g., allergies that could result in a serious reaction, including anaphylaxis) that could be triggered at the university (e.g., in courses using food, beverage, or cleaning products with allergens) should disclose such allergies to Accessibility Services (PVD, COE)/Center for Academic Support (CLT, DEN, MIA) at the earliest possible time. Where students identify such allergies, Accessibility Services (PVD, COE)/Center for Academic Support (CLT, DEN, MIA) or some other appropriate office within the university will work with the student on an individualized, case-by-case basis to determine whether any academic adjustments are appropriate. Any student seeking academic adjustments must provide appropriate medical documentation identifying the nature and scope of the allergy, including its severity; any functional limitations resulting from the allergy; and proposed academic adjustments supported by such medical documentation. For further details, consult the Policy and Procedure for Student Disability Accommodations.
- b. The health and safety of all JWU students are paramount. Students with known allergies are expected to engage in self-care to mitigate the risk of an allergic reaction. Self-care expectations may include, but are not limited to, refraining from tasting foods with allergens, wearing gloves, wearing alert bracelets, carrying/administering prescribed medications, including epinephrine, and refraining from placing themselves in environments or situations they know are hazardous. Students should discuss any resulting absences with the appropriate university personnel—including Accessibility Services (PVD, COE)/Center for Academic Support (CLT, DEN, MIA) and the relevant faculty members—as part of the process of determining whether and/or how an academic adjustment may apply and may or may not excuse the absence.

### **3. Faculty and Staff Responsibilities Regarding Allergies**

- a. If a student has potentially life threatening or otherwise serious allergies, the university, after considering the student's individual circumstances and medical documentation, if any, may prohibit the student from (1) interacting with the allergen at issue pending the determination of whether there is an academic adjustment that enables the student safely to interact with the allergen in question; or (2) being in an environment or a situation that exposes such student to the allergen pending the determination of whether there is an academic adjustment that enables the student safely to interact with the allergen in question. In imposing these conditions, the university will endeavor to minimize interruption to the student's educational program to the extent feasible.
- b. If the university determines there is no academic adjustment that will enable the student safely to complete any particular class or culinary lab (or alternative thereto), such student may not be eligible to remain in the particular class or culinary lab or earn any credit for same. Further, the inability to earn credit may result in an inability to complete a particular degree program. The university will work with the student to determine whether any adjustments are possible without fundamental alteration of the program in question and will engage in an interactive dialogue with the student to explore options.
- c. On learning that a student is suffering a serious allergic reaction, a faculty or staff member shall immediately call 9-1-1 and, thereafter, Campus Safety & Security. In appropriate circumstances, the university's policies governing medical withdrawals may apply.