



May 20, 2020

Robert R. Redfield, MD
Director
Centers for Disease Control and Prevention
1600 Clifton Rd.
Atlanta, GA 30329

Dear Director Redfield,

The Food Allergy & Anaphylaxis Connection Team (“FAACT”) greatly appreciates the Center for Disease Control and Prevention’s (“CDC”) prompt attention to the concerns outlined in our May 6, 2020 letter to you and the subsequent revisions to the school COVID guidance and the attention to the safety of students with food allergies during the coronavirus disease 2019 (COVID-19) pandemic, specifically the document [“Considerations for Schools”](#) released May 19, 2020 and the [May 2020 CDC Activities and Initiatives Supporting the COVID-19 Response and the President's Plan for Opening America Up Again](#). The addition of instructions on how to safely use communal areas such as cafeterias, specifically the guidance to “stagger use and clean and disinfect between use” and the guidance to “ensure the safety of children with food allergies” with the hyperlink to the CDC’s [“Voluntary Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs”](#) (herein after “Food Allergy Voluntary Guidelines”) are a step in the right direction. While these additions address the concerns FAACT raised in our May 6, 2020 letter to you, specifically the risk of schools denying students the right to accommodations prohibiting the consumption of allergens in the classroom or requiring the consumption of food items outside of the classroom (accommodations encouraged in the CDC’s Food Allergy Voluntary Guidelines), FAACT is still concerned that school officials may have difficulty in understanding this, given that the hyperlinked Food Allergy Voluntary Guidelines are 103 pages long. In an effort to ease the unprecedented burden on school officials and to address the overwhelming concerns of the food allergy community, FAACT respectfully requests that the CDC revise the “Considerations for Schools” document to specifically address students with food allergies in a manner equivalent to students with other disabilities such as asthma.

In “Considerations for Schools”, the CDC addresses “Ventilation” under “Maintaining Healthy Environments” by giving the specific example of “opening windows and doors”. This guidance goes on to instruct “[d]o not open windows and doors if doing so poses a safety or health risk (e.g., risk of falling, triggering asthma symptoms) to children using the facility.” FAACT respectfully requests that the CDC amend the language addressing “Food Services” under the same “Maintaining Healthy Environments” provisions. Currently this section of “Considerations for Schools” states “Have children bring their own meals as feasible or serve individually plated meals in classrooms instead of in a communal dining hall or cafeteria, while ensuring the safety of children with food allergies” with a hyperlink to

the CDC's Food Allergy Voluntary Guidelines. FAACT requests that, in addition to the hyperlink, the CDC specifically include language similar to the above language addressing asthma. This could simply be done by including language that states that food or foods containing allergens should not be consumed in the classroom if doing so poses a safety or health risk to students with food allergies or violates Federal disability laws. As prescribed by the Food Allergy Voluntary Guidelines, students with food allergies should be afforded the accommodation of either prohibiting the consumption of their allergens in the student's learning environment (i.e. the student's classroom) or the accommodation of having all food items consumed outside of the student's learning environment (i.e. the student's classroom). Classes that contain students with food allergies could still consume their meals in the communal eating area (i.e. cafeteria or dining hall) while allowing classes that do not contain a student with a food allergy to consume their meals in the classroom. This would greatly reduce the population size of the communal dining area, thus mitigating the risk of the spread of COVID-19. Additionally, this risk would be further minimized if schools follow the guidance set forth in "Considerations for Schools" specifically addressing the use of "Communal Spaces" and instructing schools to "stagger use and clean and disinfect between use."

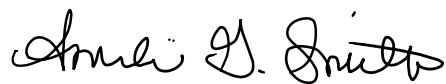
Should you have any questions or concerns regarding FAACT's position and recommendation, please contact FAACT's Vice President of Civil Rights Advocacy, Amelia G. Smith, J.D., at Amelia.Smith@FoodAllergyAwareness.org.

We appreciate your prompt attention to the concerns raised in our May 6, 2020 letter and your continued attention to this crucial issue affecting the 6 million American children with food allergies.

Respectfully yours,



Eleanor Garrow-Holding
President & Chief Executive Officer



Amelia G. Smith, JD
Vice President, Civil Rights Advocacy