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TRANSLATION OF THE CDC FOOD ALLERGY GUIDELINES USING THE
KNOWLEDGE TO ACTION FRAMEWORK

Submitted to the Faculty
Yale University School of Nursing

In Partial Fulfillment
of the Requirements for the Degree
Doctor of Nursing Practice

Robin Landes Wallin

May 15, 2105

The capstone is accepted in partial fulfillment of the requirements for the degree Doctor of Nursing Practice.

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May 15, 2015

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May 15, 2015

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Signed: Robin Landes Wallin

May 15, 2015

Translation of the CDC Food Allergy Guidelines using the Knowledge to Action Framework

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The findings and conclusions in this report are those of the authors and do not necessarily reflect the official position of the Centers for Disease Control and Prevention.

1 **Abstract**

2 Managing food allergies in schools has become a critical strategy for ensuring the health
3 and safety of students. The Centers for Disease Control and Prevention’s (CDC) *Voluntary*
4 *Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*
5 (CDC, 2013) provides schools with important guidance for this complicated task. The CDC
6 developed a food allergy guidelines toolkit for schools to bring the contents of the guidelines to
7 priority school audiences in easily accessible and relevant formats. This manuscript outlines the
8 development process of the toolkit using the CDC’s National Center for Chronic Disease
9 Prevention and Health Promotion’s (NCCDPHP) Knowledge to Action Framework (K2A
10 Framework). The implementation of this process included the decision to translate, identification
11 of priority audiences, inquiries and discussion with key stakeholders, resource development and
12 the final process of planning for dissemination of the toolkit contents. The value and
13 effectiveness of the collaborative process used in the “Knowledge into Products” phase of the
14 framework is shared. The K2A Framework may also prove to be an effective model to guide
15 future public health translation projects.

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24 **Introduction**

25 Meeting the daily health care needs of children at school is critically important work for
26 school nursing and school health services. This reality is reflected in a report of the National
27 Survey of Children with Special Health Care Needs, in which it was noted that 13.9% of children
28 in this country have special health care needs (U.S. Department of Health and Human Services,
29 2008). McPherson et al. (1998) describe children with special health care needs as those who
30 have physical, developmental, emotional or behavioral chronic conditions which demand more
31 services than those normally needed by children. The prevalence and needs of children with
32 special health care needs has led to a growing concern for health and education officials alike. As
33 more students come to school with chronic conditions, schools need to be ready to manage these
34 problems and respond to emergencies that may arise while a student is at school (Council on
35 School Health, 2008). Indeed, an Institute on Medicine report noted that better outcomes for
36 people with chronic diseases require an “interface of the public health system, the health care
37 system, and the non-health care sector” (IOM, 2012, p. 7). Schools are an important non-health
38 care sector.

39 Food allergies are a serious chronic condition, and schools have responsibility in helping
40 students manage them during the school day. A food allergy has been defined as “an adverse
41 health effect arising from a specific immune response that occurs reproducibly on exposure to a
42 given food” (Boyce, et al., 2010, p. S8). It is estimated that approximately 4% of children under
43 the age of 18 in the U.S. have a food allergy, and the prevalence of food allergies appears to be
44 increasing (Branum & Lukacs, 2008). Food allergy reactions can range from mild to very
45 serious, including the potential for anaphylaxis, a life-threatening reaction that can affect the
46 respiratory system, gastrointestinal tract, skin and cardiovascular systems (CDC, 2013; Burks,

47 Jones, Boyce, Sicherer, Wood, Assa'ad & Sampson, 2010). It is critical for school personnel to
48 be aware of how to prevent food allergy reactions and how to respond to anaphylaxis
49 emergencies in order to help keep students with food allergies healthy and safe at school.

50 In 2013, the Centers for Disease Control and Prevention (CDC) published the *Voluntary*
51 *Guidelines for Managing Food Allergies in Schools and Early Care and Education Programs*
52 (CDC, 2013). The guidelines were created in compliance with Section 112 of the Food and Drug
53 Administration (FDA) Food Safety Modernization Act, which called for the Secretary of Health
54 and Human Services to “develop guidelines to be used on a voluntary basis to develop plans for
55 individuals to manage the risk of food allergy and anaphylaxis in schools and early childhood
56 education programs” (U.S. Food and Drug Administration, 2011). The FDA also directed that
57 the guidelines be made “available to local educational agencies, schools, early childhood
58 education programs, and other interested entities and individuals to be implemented on a
59 voluntary basis only” (U.S. Food and Drug Administration, 2011). The CDC’s National Center
60 for Chronic Disease Prevention and Health Promotion (NCCDPHP) developed the guidelines in
61 collaboration with the U.S. Departments of Education, Agriculture, and Justice, as well as other
62 divisions in the U.S. Department of Health and Human Services. Other subject matter experts
63 also contributed to the creation of the guidelines. These included representatives from
64 organizations with experience in food allergy management and national organizations
65 representing school professionals. “A systematic process to collect, review, and compile expert
66 advice, scientific literature, state guidelines, best practice documents, and position statements
67 from individuals, agencies and organizations” was used under the guidance of a panel of subject
68 matter experts (CDC, 2013, p. 12). The outcome of this collaborative work led to the

69 identification of these five priority recommendations for schools to address in their Food Allergy
70 Management Prevention Plans:

- 71 1. Ensure the daily management of food allergies in individual children.
- 72 2. Prepare for food allergy emergencies.
- 73 3. Provide professional development on food allergies for staff members.
- 74 4. Educate children and family members about food allergies.
- 75 5. Create and maintain a healthy and safe educational environment. (CDC, 2013, p. 15)

76
77 The CDC food allergy guidelines are comprehensive and provide content required by the
78 FDA Food Safety Modernization Act. This document represents the first time that
79 comprehensive national guidelines have been identified for managing food allergies in the school
80 setting (CDC, 2013). Table 1 outlines the essential elements of the guidelines. The purpose of
81 this manuscript is to provide a description of the development of the CDC food allergy
82 guidelines toolkit for schools using the Knowledge to Action Framework (Wilson, 2011).

83 **Background – Knowledge to Action Framework**

84 It has been noted that the act of knowledge translation is dependent on trusted
85 relationships, collaboration and communication between research scientists and the users of
86 research (Bennett & Jessani, 2011). The translation of scientific knowledge about chronic disease
87 management into public health practices has been identified as a priority by the CDC (Wilson,
88 Brady & Lesesne, 2011). To this end, the CDC convened a Workgroup on Translation to develop
89 definitions and a framework to guide the process of research translation at the agency. One of the
90 findings of the work group was the need to create translation of scientific interventions such as
91 guidelines (Wilson & Fridinger, 2008). The outcome of this work led to the development of the
92 Knowledge to Action Framework (Figure 1), which outlines three phases of the translation
93 process: research, translation, and institutionalization. The K2A framework also identifies “the

94 decision points, interactions, and supporting structures within phases that are necessary to move
95 knowledge to sustainable action” (Wilson, Brady & Lesesne, 2011, p. 1).

96 The first phase of the K2A Framework is the research phase, when the scientific evidence
97 for practice is discovered. In the framework, research then leads to a decision to translate the
98 findings to promote widespread adoption of evidence-based practices. The Workgroup on
99 Translation defined translation as “the process and steps needed and taken to ensure effective and
100 widespread use of evidence-based programs, practices and policies” (Wilson, Brady & Lesesne,
101 2011, p. 1). The translation phase of the framework includes the decision to translate,
102 transforming knowledge into products, developing supporting structures, and disseminating
103 programs, practices, or policies to potential users of the research. “Knowledge into products”
104 refers to the process of systematically addressing the needs of specific audiences by creating
105 products to assist putting evidence into practice. The ultimate goal of the work of the translation
106 phase is the institutionalization of practices, policies and programs that will support public
107 health. The framework also points to the need for “supporting structures” in each phase. These
108 can include general and specific structures. Examples of supporting structures in the translation
109 phase of the framework include accessible training, the provision of technical assistance and
110 creating carefully researched products and materials. Finally, a crucial component of the
111 framework is evaluation, which spans all of the phases of the process (Wilson, Brady & Lesesne,
112 2011)

113

114 **Challenges of Translation for the Education Sector**

115 The translation of science for the public health sector can be challenging. For health
116 scientists, one of the more frustrating challenges is the length of time it has traditionally taken for

117 adoption of scientific evidence into widespread practice. It has been estimated that it can take up
118 to two decades for new scientific knowledge to be widely adopted into practice (Balas & Boren,
119 2000; Sussman, Valente, Rohrbach, Skara & Pentz, 2006; Colditz, 2012). Creating pathways to
120 quicker adoption of evidenced-based practice is key to achieving public health (Wilson &
121 Fridinger, 2008). Sussman et al. (2006) note, “Without effective translation, the fundamental
122 aspects of quality health care – effective, efficient, current, and timely care that could save many
123 lives – cannot be achieved” (p. 8). Other common barriers in the translation of science include
124 the need for collaboration, conflict of interest between stakeholders, concern with costs and time,
125 the need for communication between basic and applied scientists, and a lack of awareness by
126 practitioners who could implement the innovation.

127 In a review of translational research funded by the Agency for Healthcare Research and
128 Quality, some of the challenges in translating research into clinical practice in healthcare settings
129 were outlined (Feifer et al., 2004). These findings and observations are likely also relevant in the
130 educational setting. In this review, the authors identified barriers to the implementation of
131 guidelines which can include not knowing that the guidelines exist, feeling that there is not time
132 to implement them, distrust, or not having the information that is needed when one needs it.
133 Recognizing potential barriers and gaining feedback from the target groups is essential in the
134 development of translational materials.

135 Although there is still little research on the implementation of public health initiatives in
136 school settings, it is known that schools can present specific challenges for implementing and
137 sustaining change. Many schools, dependent on local funding, experience economic challenges,
138 and schools can differ significantly in available resources and program quality. Another
139 consideration is the political and policy environment at the national, state, and district levels that

140 affect health promotion. Interventions that use existing resources are more likely to be successful
141 in the school setting, and creating partnerships with teachers and school administrators is more
142 likely to affect sustained change (Lee & Gortmaker, 2012; Israel, Leung & Wiecha, 1998). A
143 study of schools in Australia found that barriers to sustained health promotion in schools
144 included the complexity and diversity of schools, poor communication between schools,
145 ineffective interactions between the health and education sectors, lack of evaluation of health
146 programs in schools and a lack of health promotion mandates and recognition (Keshavarz,
147 Nutbeam, Rowling & Khavarpour, 2010).

148

149 **Methods/Strategies/Intervention Applications**

150 **Project Goals**

151 The strength of the *Voluntary Guidelines for Managing Food Allergies in Schools and Early*
152 *Care and Education Programs* lies in the comprehensive and evidenced-based
153 recommendations. Making the content of this 103-page document easily accessible and
154 understandable for schools is a critical translation strategy for CDC. The focus of this project
155 was to develop translation materials based on the guidelines' content that could reach priority
156 school audiences in formats that are relevant and effective. The goals of this project were:

- 157 • To develop research translation tools and resources for key stakeholders to support
158 greater dissemination of the *Voluntary Guidelines for Managing Food Allergies in*
159 *Schools and Early Care and Educational Programs*.
- 160 • To inform technical assistance that is provided to CDC-funded partners about food
161 allergy management in schools.

- 162 • To demonstrate the application of the K2A Framework in research translation for
163 schools.

164

165 **Project Methodology**

166 This project focused primarily on the translation phase of “transforming scientific
167 knowledge into actionable products, developing appropriate supporting structures, and
168 disseminating evidence-based programs, practices, or policies to potential adopters” (Wilson,
169 Brady & Lesesne, 2011, p. 2). The K2A framework guided the following steps of the translation
170 project: the decision to translate, inquiries and discussions with key stakeholders, target audience
171 identification, resource development process and final processes and dissemination planning.

172 **Decision to Translate:** The decision to translate occurred after publication of the
173 guidelines. Although the research phase was completed during the development of the guideline
174 document, an updated environmental scan of existing food allergy resources for schools was
175 conducted at the onset of this translation project in order to help identify and evaluate existing
176 food allergy resources for schools. Additionally, inquiries from school health partners informed
177 the decision to translate, indicating a need for streamlined information for specific audiences.

178 **Priority Audiences Identified/Defined:** The environmental scan helped inform what
179 audiences to target in the translation project. Based on this information and consultation with
180 collaborating partners, the following priority audiences were chosen for the focus of the
181 translation project: School superintendents, school administrators, teachers and paraeducators,
182 school nutrition professionals, school mental health professionals and school transportation staff.
183 These school personnel each have an important and specific role to play in assisting with the
184 management of food allergies in schools. Since there were resources already available that

185 address the CDC guidelines for school nurses, they were not considered a priority audience for
186 resource development. However, engaging school nurses and raising their awareness of the
187 toolkit will be essential to the success of the translation project. A list of the toolkit products
188 created and their intended audiences can be found in Table 2.

189 **Inquiries and Discussions with Key Stakeholders:** The collaborative process in this
190 translation project included obtaining consultation and input from CDC experts as well as
191 national organizations and individuals representing school health professionals (e.g., school
192 nurses, school transportation experts, school psychological and counseling professionals). This
193 feedback was obtained through an environmental scan of existing resources, a series of informal
194 discussions with individuals from the professional organizations, a semi-structured discussion
195 with a small group of 7 school nurses, and a final review of the translation materials by key
196 stakeholder audiences. Potential barriers were addressed in this project by eliciting feedback
197 from these diverse sources throughout the process of resource development. These contacts
198 provided information about what the organizations and individuals were already doing to address
199 food allergy management in schools and shared suggestions for how CDC resources could
200 augment the support provided to schools. The discussions with professionals in education and
201 educational support services also helped the CDC better understand the concerns of these priority
202 groups, as well as the most effective modes of delivery of health information. For example,
203 experts in the field helped to refine the language used in the materials to reflect the appropriate
204 language for specific audiences. This formative process ensured that diverse interests were
205 engaged and helped to make the final products stronger resources that are supported by a wide
206 range of organizations and experts. The process of developing these relationships took
207 significant time during the project. During final review of the tip sheets and PowerPoint

208 presentations, 112 comments and suggestions from stakeholder reviewers were provided.
209 Another important outcome of this collaboration was the development of working relationships
210 with several experts in the field who provided ongoing feedback throughout the entire resource
211 development process.

212 **Document and PowerPoint Development Process:** The procedures established at the
213 CDC to review and approve materials produced by the agency provided valuable oversight of the
214 development of the toolkit's contents. Every item created (resource list, tip sheets, presentations,
215 and podcasts) underwent review by health scientists, branch and division leadership, and CDC
216 editors. The "Clear Communication Index", a tool which provides content developers with
217 criteria to ensure that communications for the public are clearly understandable, was also
218 implemented during the toolkit development and helped to ensure clarity of written products
219 (CDC, July 2014). Graphic designers at the CDC helped to ensure that the tool kit contents were
220 visually appealing, consistent and appropriate for each of the audiences. For example, the CDC
221 uses graphic visuals to convey important health information for the public, and this tool kit also
222 includes relevant simple graphics to display specific data and content and convey the importance
223 of the issue of managing food allergies in the school setting.

224 **Final Processes and Dissemination Planning:** Although the translation phase of this project
225 did not include dissemination, planning for the future dissemination of the resources was an
226 ongoing objective throughout the tool kit development. The CDC K2A Framework developers
227 define dissemination as, "a purposeful and facilitated process of distributing information and
228 materials to organizations and individuals who can use them to improve health" (CDC, 2014a, p.
229 11). With this in mind, plans were developed to work with national organization partners to
230 support dissemination of the tool kit to key audiences. Key collaborators will be engaged from

231 the relationships developed during the tool kit development. Additionally, CDC evaluators will
232 follow web metrics to evaluate and assess views of the tool kit contents. A webinar is planned
233 with a CDC partner, which will also help to begin dissemination of the resources to priority
234 audiences. Finally, working with partners who represent school nurses to disseminate the tool kit
235 to school health professionals will be key in ensuring wide dissemination and use of the food
236 allergy resources.

237 **Discussion**

238 The focus of this project was the creation of translation materials to bring the content of
239 the CDC food allergy guidelines for schools to priority audiences. The K2A Framework helped
240 to inform the decision to translate and identify and define priority audiences. The collaboration,
241 inquiries and discussions with key stakeholders were key methods used to ensure that the project
242 would be successful. Also important was the involvement of CDC oversight in the resource
243 development process. Planning for dissemination was an important action as well.

244 In a study of providing a food allergy education professional learning opportunity for
245 school nurses, which included a presentation and handout, researchers in Texas noted that this
246 effort was an effective way to change food allergy management practices in schools (Chokshi,
247 Patel & Davis, 2014). Likewise, the decision to develop tip sheets, PowerPoint presentations,
248 and podcasts in this project will address the need to provide resources for the education sector
249 that are accessible, available at no cost to the school, and potentially impactful on key audience
250 knowledge and on school environments and policies.

251 In a cross-sectional study of researchers, the majority reported spending less than 10% of
252 their time in the dissemination of their research priorities. Some of the dissemination planning
253 gaps identified in the study included a failure of many researchers to use a theory or framework

254 to guide dissemination planning. Another common gap was the failure to involve and engage key
255 stakeholders and use appropriate dissemination messaging (Brownsen, Jacobs, Tabak, Hoehner
256 & Stamatakis, 2013). Working directly with practitioners in the field who will be implementing
257 research is one important way to ensure that translation will be relevant and useful (Sofaer, Talis,
258 Edmunds, Papa, 2013). Previous translation projects have demonstrated this importance
259 including the Not on Tobacco Program, which involved school audience stakeholders in the
260 planning of the design of the intervention (CDC, 2014b; Noonan & Emshoff, 2011). Similarly,
261 perhaps the most effective strategy employed in this research translation project was the
262 development of active partnerships with key stakeholders. Building trusted relationships with
263 representatives from important stakeholder organizations and with individuals active in the field
264 of food allergy management in schools was critical. Maintaining these contacts allowed for
265 careful planning and ongoing evaluation during the development of the resources in the toolkit.
266 In addition to providing input during the environmental scan of resources, key stakeholders
267 reviewed tool kit content throughout the process of development and provided ongoing critique
268 and input. One way of evaluating this input was to use a comment table to identify the concern
269 and address each comment and respond appropriately. An excerpt from this table can be found
270 in Table 3. A second valuable activity in the formative process was engaging in a discussion with
271 a group of eight practicing school nurses to ascertain their suggestions for strengthening the
272 content of the tip sheets for specific school audiences. This input from school nurses allowed the
273 content of the resources to reflect real practice concerns of these school health professionals. One
274 example of this was the addition of language to specific tip sheets which addressed not leaving a
275 student alone who is experiencing an allergic reaction. Taking into consideration varying view
276 points and priorities also helped to ensure that the resources would be well received by their

277 intended audiences. As this project moves into the institutionalization phase of the K2A
278 Framework, these stakeholder relationships will assist with ensuring that the toolkit impacts
279 practice in a meaningful and sustained manner. The resulting final changes to the content helped
280 to make the resources more relevant and responsive to the priority audience concerns and needs.

281 **Conclusion**

282 In conclusion, the value of using the K2A Framework to guide the translation process is
283 evident. First, paying attention to the supporting structure of stakeholder involvement was
284 valuable. Weighing the opinions and priorities of multiple stakeholders was challenging, but key
285 to the success of the project. The collaborative process ensured that each of the targeted school
286 audiences would have discipline-specific translation materials that are relevant and accessible.
287 Communicating and collaborating with key stakeholders helped to develop support for the
288 dissemination of the tool kit contents to constituents. Finally, the collaborative process used in
289 this project served to help strengthen relationships with School Health Branch partners, and it
290 will help to facilitate future collaborations to promote public health in schools. Future work will
291 include developing evaluation structures for the implementation and institutionalization of the
292 use of the food allergy tool kit. The success of this phase will help to inform future efforts to
293 change public health practices in educational settings. Lessons learned from this project suggest
294 that developing trusting collaborative relationships with key stakeholders is very important when
295 bridging the gap between public health and health promotion practice in schools. Disseminating
296 evidenced-based health information and recommendations to educators and schools will continue
297 to be important. This project suggests that the K2A Framework could provide an effective guide
298 for the movement of research to practice in schools and other public health venues.

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387 **Table 1.**

388 **Elements included in the Voluntary Guidelines for Managing Food Allergies in Schools and**
389 **Early Care and Education Programs (CDC, 2013)**

390

Section 1 Food Allergy Management in Schools and Early Care and Education Programs
<ul style="list-style-type: none"> • The role of parents in providing medical documentation and medication to schools
<ul style="list-style-type: none"> • The creation of individual food allergy management plans
<ul style="list-style-type: none"> • Strategies for communicating between schools and emergency medical providers,
<ul style="list-style-type: none"> • The need to educate schools staff, parents and children about food allergies,
<ul style="list-style-type: none"> • Having accessible emergency epinephrine,
<ul style="list-style-type: none"> • Ensuring that food allergy management plans address extracurricular and after school programs,
<ul style="list-style-type: none"> • Record keeping of medication administration and emergency responses.
Section 2 Actions for School Boards and District Staff
Section 3 Actions for School Administrators and Staff
Section 4 Actions for Early Care and Education Administrators and Staff
Section 5 Federal Laws and Regulations that Govern Food Allergies in Schools and Early Care and Education Programs
Section 6 Food Allergy Resources

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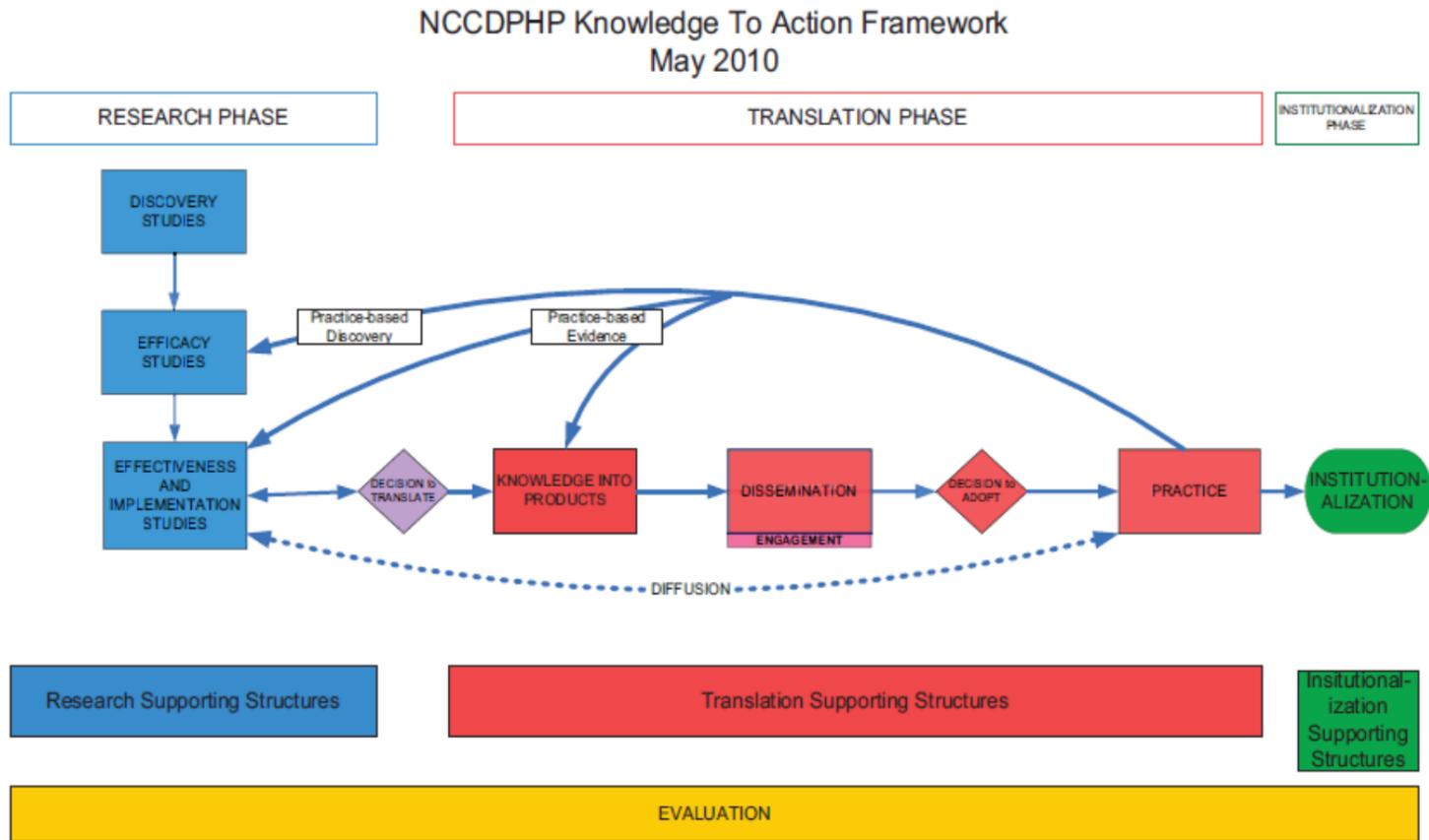
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398 **Figure 1 – NCCDPHP Knowledge to Action Framework**



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400 *Source:* Wilson KM, Brady TJ, Lesesne C, on behalf of the NCCDPHP Work Group on Translation. (2011). An organizing framework for translation in public health: the

401 Knowledge to Action Framework. *Prev Chronic Dis* 2011; 8(2). Retrieved from http://www.cdc.gov/pcd/issues/2011/mar/10_0012.htm.

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403 **Table 2 – CDC Food Allergy Guidelines Translation Project Toolkit Products***

Product	Resource Description	Audiences
Tip Sheets	These 2-4 page documents were created to address managing food allergies in schools with particular attention to the role of each of the priority audiences. The tips sheets can be viewed electronically or downloaded and printed from the CDC web site’s food allergy toolkit page.	School superintendents, school administrators, teachers and paraeducators, school nutrition professionals, school mental health professionals, school transportation staff
Select Resources for Schools Handout	This resource list provides schools with helpful resources for managing food allergies in schools. Live links are imbedded in the handout for electronic viewing. The Select Resources handout can be viewed electronically or downloaded and printed from the CDC web site’s food allergy toolkit page.	School nurses, school superintendents, school administrators
Customizable PowerPoint Presentations	These presentations were created to be used by school nurses and other health educators to introduce priority school audiences to the content specific to their role in managing food allergies in schools. All of the PowerPoint presentations are available for downloading from the CDC web site’s food allergy toolkit page.	General school audiences, school administrators, teachers and paraeducators, school nutrition professionals, school mental health professionals, school transportation staff
Podcasts	These short audio files are directed at each priority audience to introduce them to their role in managing food allergies in schools and to guide them to the CDC food allergy toolkit resources. The podcast links were also shared with CDC partners who represent school employees for distribution in their networks.	School nurses, school superintendents, school administrators, teachers and paraeducators, school nutrition professionals, school mental health professionals, school transportation staff
Webinar	A webinar was developed in collaboration with CDC partner organizations to introduce the food allergy toolkit to parents, school nurses and school administrators.	Parents, school nurses, school administrators

404 *All Food Allergy Toolkit materials are available at <http://www.cdc.gov/healthyyouth/foodallergies/index.htm>

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406 **Table 3 – Excerpt from Reviewer Comment Table**

Reviewer	Document	Reviewer Comment	Disposition	Justification
Reviewer 1	Administrator PowerPoint	Slide 8 - Slide title should be: Food Allergy Management and Prevention Plan. To eliminate confusion, can changes be made to Narrative and to other slides throughout all presentations, when referring to a school’s food allergy policy, from ‘Food Allergy Emergency Plan’ to ‘Food allergy policy’ or ‘Food Allergy Management and Prevention Plan’?	Changed narrative on slide to include: <i>This plan is needed to manage and monitor students with food allergies on a daily basis, whether they are at school or at school-sponsored events.... Your school plan should include developing procedures for identifying children with food allergies and creating individual food allergy emergency plans for these students.</i>	Clarity of understanding
Reviewer 1	Administrator Tip Sheet	Change prevalence of food allergy from 4% to 4-5% of students	Not making suggested change	Decision to keep 4%, which more accurately reflects prevalence of school age children with food allergies
Reviewer 2	School Nutrition PowerPoint	Page 12 - consider highlighting confidentiality issues here to be sure that this is emphasized	Added to Narrative: <i>As always when dealing with student information, it is important to be mindful of the federal and state laws that protect the privacy or confidentiality of student information and other legal rights of students with food allergies. More information about federal laws can be found in the guidelines document.</i>	Emphasis on confidentiality issues

