



# Westercamp Consulting Food Allergy Management Needs Assessment

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# Food Allergy Management Needs Assessment Seattle Public Schools (SPS)

January 18, 2025

## Commendation

Culinary Services is dedicated to providing students with healthy, nourishing meals that reflect the students' desired cuisines. Even while short staffed, the department works together to make sure each student is fed nutritious meals. I love the innovation regarding procurement and programming as this is a school meal program that stands alone in regards to culinary innovation.

Other school personnel, like Health Services, are also very passionate about their jobs.

## Review of Food Allergy Management

The US Food and Drug Administration (FDA) oversees the management of educating consumers on food allergies. Currently, there are [nine food allergens](#) that school districts must accommodate. The nine food allergens are: dairy, egg, fish, shellfish, tree nuts, peanuts, wheat, soy and sesame. The requirement to provide students with special dietary needs is managed by the US Department of Agriculture (USDA), which also includes any student with a life debilitating illness, such as diabetes or celiac disease. Schools that operate the National School Lunch Program (NSLP) are required to provide appropriate accommodation for all students with a food allergy and disease. USDA requires appropriate documentation to be collected to ensure the students are accommodated properly per the licensed medical provider's care. The Culinary, Health, and Student ADA Services are crucial to meet the needs of students with special dietary needs.

In my experience, school districts across the country are dealing with increases in student food allergies. The US Center for Disease Control and Prevention (CDC) identifies that approximately [8% of the country's student population have a food allergy](#). More students are being diagnosed with complex allergy combinations, such as multiple allergies. This does not include students with other life altering illnesses that impact the ability to consume certain foods.

Several school districts have experienced unfortunate cases where students are not provided appropriate care for food allergies within the past year. In each of these cases, the breakdown of communication and follow through of the approved plan, whether IEP, 504 or other agreed upon management plan, resulted in devastating events for the students impacted. The families



of these students sued the school district resulting in attorney fees, poor school district reputations, and hundreds of thousands of dollars in settlement fees.

## Observations

While visiting for two days in December 2024, I met with the Culinary Services, Health Services Manager, and visited multiple schools. The Student ADA department did not want to meet while visiting due to being short staffed. However, this is a very important service to SPS students. The Student ADA department plays a crucial role in the accommodation of students, and they should be willing to be part of the conversation. In order for the other departments to properly accommodate students based on the 504/IEP plan, the individuals working in the Student ADA department need to inform what has been agreed upon. If there is not consistent and effective communication, how can other departments know how to best accommodate students? This breakdown in communication and teamwork can result in a lawsuit that can devastate the school district.

At Seattle Public Schools (SPS), there are approximately 5,000 students in attendance each day at 104 building sites. Currently, the Culinary and Health Services departments have identified 1,927 students needing accommodation at 100 schools in the district (26% of the student population report a food allergy). Of that total number, there are only 275 students with documentation on how to properly accommodate these students in 68 buildings (only 14% of documentation provided for students with special dietary needs). Note that this does not include any allergies, or life-debilitating diseases, documented by the Student ADA department as this information has not been shared across departments.

Based on this demographic information, SPS has significantly more students with reported food allergies than the national average. Accommodating students should be a high priority for SPS. From the school district's website, SPS believes in putting students' needs first for every decision by eliminating opportunity gaps and fostering an environment where every student is able to excel.

My observations after meeting with Culinary Services, Health Services, school cafeteria teams, and other school environment personnel at seven schools are described below in the following categories: preparation, meal service, Culinary Services consultant, documentation, and Health Services.

### Preparation

The methods to prepare each school building for meal service is very effective and amazing to watch the team accomplish this every day. The warehouse team, from the Culinary Services Department, works hard to organize the food items needed for each building and ship them out. The Culinary Services Department is working on implementing technology that will link the inventory to allergens, which will be helpful.



For each building the warehouse team organizes foods needed to meet the menu. While the warehouse team does indicate allergies on the inventory sheet for the building, there is not specific information for each food item as well as identifiable information on what product has those allergens. Some of the foods are sent in food safe bags with no indication of what that product is or what allergens are included. This is important because the Culinary Services team does receive food substitutes from the vendor without much notice. Therefore, we cannot expect the cafeteria teams to automatically recognize which products are provided and the allergens in each of these.

Additionally, the Culinary Services team does have multiple nationalities and reading abilities within the department. In observing the warehouse team and then individual cafeteria teams, there is a lack of consistent messaging (and/or resources) that every person can understand the products and allergens present.

### Meal Service

Each building is unique based on the student population, communication between departments, and abilities from each team member. After visiting seven schools' meal services, there is a substantial inconsistency in the cafeteria staff being able to always know their role. This is due to:

- Labor shortage,
- Revolving door of Culinary Service substitutes,
- Lack of understanding their role with accommodating students with special dietary needs, and
- Inconsistent communications from the school nurse.

While every cafeteria staff member wants to do a good job and knows their students very well, they do not have the resources or sufficient information to make real-time decisions on accommodating students with special dietary needs. Moreover, cafeteria substitutes do not have any resources onsite to help them navigate student needs and typical day to day operations. There was one school that did create a folder for cafeteria substitutes, but this was only because the cafeteria manager is completely competent and highly conscious. Not every Culinary Services frontline staff has these leadership characteristics, which means resources need to be created to help all staff accommodate students with special dietary needs (and more).

Later on in this report I will provide more detail about the Health Services Department, but I aim to report what happens at the various school buildings day to day. In each building I visited the cafeteria and meal service, I attempted to speak with the school nurse, but there was never someone there to speak with. I believe this is because the Health Services Department is also short staffed and nurses are not onsite at each building every day. To my understanding, school nurses rotate between an identified number of schools each day of the week.



This inconsistency is important for two reasons:

- 1) Some students require consistent daily care, such as calculating correct amounts of insulin. How are students properly utilizing needles and calculating insulin each day when a school nurse is not present?
- 2) Important student health information falls between the cracks, such as cafeteria managers not being aware of the latest student allergy.

Only one school reported having regular meetings with the school nurse to effectively communicate any student need updates, and this is due to the fact that the cafeteria manager constantly sought information from the school nurse. In the schools I visited, the information the cafeteria staff were working off on was old and incomplete.

Meal service at each school is extremely rushed. School day schedules are difficult to create, and there are multiple nuances to create an effective school day schedule. However, the meal services are so quick that this small window to feed hundreds of students puts extreme pressure on all cafeteria staff (and substitutes). This creates a pressure cooker of not being able to effectively accommodate all students properly. Additionally, students do not have the time to finish their meal; therefore, a good number of students actively elect to not even eat. In order for our students to be successful at learning, we need to provide proper time to allow them to eat a healthy meal. For more best practices and research completed on this topic, please review the following:

- School Nutrition Association: [Time to Eat School Lunch Affects Elementary Students](#)
- Education Week Article: [Teachers Say Students Don't Have Enough Time to Eat](#)
- CDC: [Time for Lunch](#)
- Center for Ecoliteracy: [Seven Proven Strategies to Increase Students' Time to Eat](#)

### Culinary Service Consultant Dietitian

Currently there is not a full-time Registered Dietitian on the Culinary Services staff. Nonetheless, Culinary Services does consult with a dietitian that is scheduled to work two to four hours each Friday only. This capacity is due to the consultant dietitian's availability, and the Culinary Services restraints on hiring consultants. In similarly sized school districts as SPS across the country, the Culinary Services department staffs one individual to solely focus on special diets, typically a dietitian.

Crystal, current consultant dietitian, does not have experience with accommodating students with special dietary needs or school nutrition; therefore, she reported she needs direction on the work she is to accomplish weekly. For the past three years, Crystal has had different tasks regarding her overall responsibilities, which creates more confusion and lack of confidence to accomplish the work effectively. The processes and efficiencies of the consultant dietitian needs to be reviewed and updated with clear direction. Crystal does truly care about SPS students as she reported that she feels students deserve to have a dietitian working more hours on a regular basis. Additionally, Crystal is not surprised that there are gaps with accommodating students with special dietary needs.



## Documentation

The required documentation for households to complete in order for their student to be properly accommodated is very cumbersome. First, the school district website is not easy to navigate to quickly find the forms. While speaking with the Health Services Manager, he even had extreme difficulty in locating the forms his department utilizes. Second, there are too many forms the household needs to complete. To my knowledge, households must complete an epi pen focused form first and then this triggers another form that indicates why the epi pen is necessary. Based on my observations, I do not see any communication sent out to households about the two form steps for accommodation.

If a parent doesn't take both forms to the doctor's (or other licensed medical provider), then there is a massive amount of information lost. SPS must recognize that most households are not able to take their students to multiple doctor appointments, which causes a barrier to care. Below I provide recommendations concerning how to make this easy for all households based on my experience.

With understanding the perspectives of the Culinary and Health Services Team, the teams have been working on identifying missing information as well as updating a form. Based on the data about the student population reporting a food allergy, there is an extreme amount of information the teams do not have. In addition, both teams are short staffed, which makes it highly unlikely that the necessary information to know how to truly accommodate students will be found. For example, several students in the school district have documentation of a food allergy to "food" and/or "unknown food allergy". This is too broad a statement for the school district to properly accommodate. Furthermore, several students need a texture modification in order to consume nutrients throughout the day. On the documentation provided indicating this need, the proper texture modification is not specified. Culinary Services is doing the best they can to provide accommodation to the student, but with no information from the Student ADA department and little from the forms, the likelihood the student could choke is high. Individuals that require a texture modification have difficulty swallowing, and by not knowing the proper texture, SPS is at risk of having a serious situation for these students.

Furthermore, some documentation submitted for students needing accommodation does not provide specific information on which food item the student cannot consume. For example, the documentation just indicates that the student cannot have dairy products. A student can be allergic to all dairy products including foods with dairy listed as an ingredient or one type of dairy product, such as cow's milk. There are multiple similar situations including other allergens, and overall this specific situation is too numerous to count throughout the school district. SPS needs to dedicate additional resources to clearly understand the proper accommodation for each student, which is required by USDA.



## Health Services

During the onsite visits, I had the opportunity to visit with the Health Services Manager, Russel. We discussed how the Health and Culinary services have been working together to gather the appropriate information on students needing special diet accommodations, but as mentioned before, both departments are short staffed, which makes gathering and checking documentation more difficult.

As with other school districts across the country, communication is at the core of the process to accommodate students with special dietary needs. As part of the process to compile complete forms for special dietary needs, Russel's team sends the forms to the Culinary Service's dietrx email, but there is not a message confirming receipt of the form. This lack of communication can make others feel the information is not shared (or completed), and it does not provide assurances that the student will be accommodated.

Russel reported that all school nurses double check the Health and Culinary Services list of students needing accommodation monthly at each building, then follow up with families, and then the school nurse updates the cafeteria manager. While this is a great procedure, as mentioned earlier, there is little evidence that the process is actually being completed. While there is the understanding that communication between the households is not immediate, especially if the household needs to see a doctor, but with the labor shortage, lack of consistency, and lack of communication, from both departments, this demonstrates that all SPS students are not being properly accommodated.

In addition to food allergies, the Health Services department also needs resources to calculate insulin needs for students with diabetes. The current resource set up for the Health Services team is not accurate, which creates a sense of frustration and worry from the school nurses. While the Culinary Services team is working on this resource by entering in data one ingredient at a time, the sheer number of items needing to be manually entered is massive for a department that is short staffed. Additionally, not having the correct carbohydrate counts for school nurses, and school ambassadors that assist with this procedure, can be very detrimental for students living with diabetes on a daily basis.

## Critical Findings

SPS is exposed to potentially thousands of potential liability cases. To put this in perspective, in just one case, a school district can be liable for hundreds of thousands of dollars and spend similar amounts on legal fees. For a low estimate, this could potentially expose SPS to \$160,000,000 in liability and expenses.

The critical findings that make SPS liable are:

- Lack of knowledge of all students requesting special diets (i.e., IEP and 504 plans).
- Lack of documentation on thousands of students reporting dietary needs.
- Lack of staffing resources to overcome this substantial hurdle.



## Best Practices

Over my tenure of working with school districts to establish proper food allergy management protocol, there are several best practices that assist with a sound procedure to accommodate all students. Below are the highlighted best practices I am recommending SPS to implement based on the findings (each best practice is broken down into topics):

### Training

- Train all Culinary Services staff annually on food allergy management procedures, types of allergens, how to utilize resources, and the role each individual plays to ensure proper accommodation.
- Create online food allergy management training for all Culinary Services.
- Cross-train all Culinary Services employees on food allergy management.
- Provide training and resources on how to effectively utilize a point of sale roster to accommodate students and track reimbursable meals.

### Resources

- Create specific menus for the most common allergies and allergy combinations, start with a one week menu cycle.
- Create a resource guide for each building that includes:
  - Menus
  - Recipes and/or ingredients included in each meal along with the proper ingredients.
  - Information about any other foods students may have to ensure each cafeteria team is aware of the products students can have. This will help prevent future confusion on a question if a student can eat a certain cereal, for example, and provide the cafeteria teams with resources to be confident in their role.
  - Big Nine Allergen Information Sheets
  - Food Allergy Management Protocol
- Utilize the Culinary Service website to add resources for staff including training and carbohydrate counts.

### Communication

- Schedule regular meetings with all pertinent departments (i.e., Culinary Services, Health Services, Student ADA Services, etc.) to identify proper steps to accommodate students.
- Provide households various communication forms to educate on the food allergy management process, forms, and how to send in completed forms.
- Send proper forms to commonly used doctor offices at the beginning of the school year with a fax number on how to return to SPS.
- Provide forms and resources on the school district's website by making it very easy to navigate and understand each step in the process of requesting accommodation.





## Forms

- Create an easy to navigate webpage on the school district's website to clearly highlight the correct documentation needed to request accommodation along with instructions.
- Create one form that captures all the pertinent information needed to properly accommodate students.
- Provide reminders to households throughout the school year on the food allergy management process.
- Identify possible barriers households encounter when completing the proper forms and identify possible steps to help eliminate barriers for households.

## Priority List

To assist Seattle Public Schools with a realistic set of goals, below are the main activities to focus on for the rest of the school year (then the best practices list above can be more manageable):

### **Culinary Services:**

- Hire a full time registered dietitian or consultant with extensive experience in food allergy management, and charge that individual with addressing gaps in SPS as set forth in this report.
- Compile a detailed list of tasks for the current consultant dietitian to complete each week.
- Apply for the EpiPen for Schools [grant](#).
- Complete the carbohydrate count information for school nurses.
- Start to create resources and training on food allergy management.

### **Student ADA Services:**

- Provide documentation regarding food accommodation to Culinary and Health services to ensure all requests are being made.
- Meet with Culinary and Health services regularly to ensure all students are properly accommodated.

### **Health Services:**

- Meet with Culinary services regularly for updates on student accommodation and forms submitted.
- Identify a way to track which households have received outreach regarding food accommodations. Create a schedule for outreach for all school buildings.
  - Work with Culinary services to identify students that need follow up outreach to clearly understand the accommodation needs.
- Continue work with Culinary services to eliminate household barriers to complete necessary forms.
- Work with Technology Services to properly place needed forms on the website that make it easy for all families to locate.



# Food Allergy Management Findings Overview

Seattle Public Schools (SPS)

January 18, 2025

## Why is this important?

All schools operating the National School Lunch Program are required to properly accommodate all students with life-debilitating needs. School districts must provide equal care to all students.

The national average of school-aged students with food allergies is 8% of the population, but Seattle Public Schools has a higher amount of food allergy cases with 26% of student enrollment having a food allergy (this number does not reflect disease states that impact students' ability to eat food).

## What are the current gaps?

- SPS does not have proper documentation on over half of the student population.
- Lack of Consistency in Resources Provided to Staff and Households
- Lack of Communication within and across Departments
- Lack of Proper Staffing Time to Solve the Issues at Hand
- Little Knowledge on Proper Food Allergy Management Protocol and Student Needs
- Household Barriers to Properly Complete needed Forms for Accommodation

## How do the current gaps impact the school district?

SPS is exposed to potentially thousands of potential liability cases. To put this in perspective, in just one case, a school district can be liable for hundreds of thousands of dollars and spend similar amounts on legal fees. For a low estimate, this could potentially expose SPS to \$160,000,000 in liability and expenses.

## Who should be involved in the food allergy management process?

To effectively manage student accommodates, a school environment team approach needs to be taken involving the following department (may not be an all inclusive list):

- Culinary Services
- Student ADA Services
- Health Services
- Technology Services
- School Social Worker Services
- Student ADA Services

## What are the priorities?

Below are the priorities for the rest of the current school year:

- Hire a full time registered dietitian or consultant with extensive experience in food allergy management.
- Identify specific tasks for the current consultant dietitian to complete each week.
- Apply for the EpiPen for Schools [grant](#).
- Share all 504/IEP requests across departments.
- Create a household outreach tracking plan including all departments to obtain proper documentation and clarify the accommodation needs.
- Create a webpage for households to easily find required accommodation forms.