



**CSIS California School Information Services**

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May 13, 2011

John Bernard, Ed.D., State Administrator  
King City Jt. Union High School District  
800 Broadway  
King City, California 93930

Dear Dr. Bernard,

On April 19, 2011, FCMAT returned to King City Joint Union High School District at the request of the state administrator to review the progress the district has made in implementing a new food services program. Prior to the 2010-11 fiscal year, food services were provided by the King City Elementary School District. At the end of the 2009-10 fiscal year, the district decided to operate the food service program. This management letter documents the implementation progress to date, recommendations for continued program improvement, and sources of training and program guidelines. FCMAT food services consultant Judy Stephens conducted the fieldwork and other analysis for this study.

### ***Child Nutrition Program Application and Reimbursement Claims***

The district filed a child nutrition program application with the state of California that was approved effective January 1, 2011. As of that date the district is authorized to operate the school meal program, and meals served to students can be claimed for reimbursement. At the time of review, claims had been submitted for January through March 2011, and the district has received revenue. Any meals served from the beginning of the school year until January 1, 2011 will not be reimbursed. Although the district planned for encroachment in the first year of program operation it will need to make budget adjustments recognizing an increase in encroachment for the 2010-11 fiscal year.

The amount of reimbursement provided to districts depends on the percentage of free and reduced meals served two years prior to current year (which would have been 2008-09). To receive maximum breakfast reimbursement, the district must serve at least 40% of free and reduced eligible lunches two years prior. To receive the maximum lunch reimbursement, the district must have served 60% of free and reduced students two years prior. The claim forms reviewed from January to March 2011 indicate that the district is reimbursed at the lower levels. This means either that records of meals served in prior years were unavailable (due to the change from elementary to high school oversight) or that the meals served two years ago to high school students didn't meet the 40% and 60% criteria. The difference in breakfast reimbursement between the basic breakfast and especially needy breakfast is \$.28/meal for free and reduced meals. It is \$.02/meal for lunches.

**FCMAT**

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Claim forms from January to March indicate that the district currently serves lunches to between 27% and 42% of its free and reduced eligible students, which does not meet minimum goals to receive higher reimbursement rates. In the review period of January to March 2011, only one month at one school (March at King City) were numbers high enough for breakfast requirements. The yearly average for two consecutive years will determine if the district meets the goals for the higher reimbursement rates, so it is important to encourage participation. However, it is against regulations to require families to participate. No statistics reached the 60% participation necessary to qualify the district for higher lunch reimbursement rates. Many factors, including school and district policies, contribute to student participation: time of day meals are served, locations where students are required to eat meals, off-campus privileges, early release or late start schedules, etc.

The Child Nutrition Information and Payment System (CNIPS) application needs to be renewed each year before claims for reimbursement may be filed. The CNIPS website annual update became available for 2011-12 renewal on May 2, 2011.

## **Recommendations**

*The district should:*

1. Immediately renew its CNIPS application.
2. Continue to encourage families to submit applications for free and reduced meals.
3. Research other successful food service programs and determine changes that can be made in the King City program to encourage and improve participation so the district can receive maximum reimbursement rates.
4. Consider conducting an anonymous survey of parents and students to determine what students/parents like about the program and what needs to be changed. This should include food choices and any barriers to program participation.

## **Free and Reduced Meal Applications / Direct Certification**

Initially the district had some difficulty with processing student applications. An extensive process to review all applications took place in fall 2010. For applications that could not be reviewed or were not initially submitted, the district had families resubmit meal applications and qualified them appropriately on the Nutrikids software program. A review of the processed applications revealed that most appear complete and correctly qualified. A few were questionable as to the category of free and reduced eligibility (e.g., income vs. categorical from CalWORKS, food stamps, etc.). But all applications reviewed have dates, signatures, and eligibility status. It would be prudent for the district to have a second reviewer from the business office double check all the applications that are processed for the 2011-12 school year to ensure accuracy. This second review should be concurrent with the original processing, because errors in processing can lead to financial penalties for each meal that is claimed incorrectly. Because the district is scheduled to have its state program review in November 2012, accuracy of free and reduced eligibility is critical.

The district expressed a desire to update its application for next year to a format that was more understandable for families and easier for the district to use. A template from a nearby district was provided by the FCMAT team to help with this process. The district plans to modify it and use it for the next school year.

According to USDA regulations (Eligibility Manual for School Meals), students who were designated as eligible for free or reduced price meals the prior school year are allowed to receive free or reduced meals for the first 30 operating days of the new school year, or until a current year application is received and processed. The district needs to work with Nutrikids support staff to make sure the program is set up properly to give students the grace period and to automatically cut off benefits for students who have not processed a new application at the end of the 30-day grace period. After the cutoff date only current year eligibility may be used to provide free and reduced meals. Because this was the first year of district operation, this was not done in fall 2010. Applications may be submitted after this date but until they are approved, students must be considered full pay. If meals are found to be based on outdated eligibility information during a program review, fines may be imposed on the district.

The district's information technology staff coordinated the direct certification process for categorically eligible students. This involves uploading information from the Department of Education website to automatically qualify eligible students for the free and reduced meal program. Families that qualify in this manner do not need to submit applications, reducing the burden on families and the district. It also tends to help increase the percentage of district students that qualify for free and reduced priced meals. This benefits students and families so they can receive meals and helps the district qualify for Title I and E-rate funding. The technology staff plans to update the direct certification throughout the year.

With proper application processing and direct certification, the district now has more reliable figures for free and reduced percentages than it did in fall 2010. According to the March 2011 meal claim form, Greenfield High School has 79% free and reduced eligibility and King City has 62%.

## **Recommendations**

*The district should:*

1. Finalize the meal application changes and make applications available to families beginning in July. Communicate the importance of this to students and families to increase eligibility by demonstrating that critical school funding for programs (such as technology and support services) is dependent on eligibility percentages.
2. Include clear, simple instructions as to the mandatory information required on a complete application.
3. Continue the good efforts with direct certification and do so as early as possible before the start of the new school year. When the matching process is complete, mail letters to qualifying students so they do not need to complete a new application. Create and print a letter in Nutrikids so directly certified students and families can be notified before applications are due.
4. Ensure that the Nutrikids program is set to change eligibilities of students who have not submitted new applications by the cutoff date.

## **Eligibility Verification**

The child nutrition program requires each district to annually verify a percentage of the applications on file. This means that randomly selected students will be required to provide proof of information stated on applications related to income. Applications based on categorical eligibility such as CalWORKS or food stamps that were not directly certified may also be chosen for verification. The verification process begins on October 1 and must be completed by November 15. Applications chosen for verification must

be selected from applications processed as of September 30. Since the district did not run the program in fall 2010, it did not complete verification but should plan to do so for the 2011-12 school year. The district and food services manager need to become familiar with this process and make sure it is completed timely. There are deadlines for selecting applications, completing the process, dropping unverified students and completing a report.

Families that do not respond to requests for verification or that cannot validate requested information will have their students changed to paid status.

The Meal Eligibility Manual for School Meals discusses the verification requirements in detail. It is available on the CDE webpage, Nutrition Services section. All necessary forms for families and the district to complete this process are also available on the website.

The NutriKids program can select applications for verification and produce letters to families. The program will also create reports of verification outcome. The NutriKids support staff are very knowledgeable about the verification process and can assist the district.

Improper completion of the verification process or failure to change student status within appropriate time frames may result in fiscal action during the coordinated review effort (CRE).

## **Recommendations**

*The district should:*

1. Ensure that the manager becomes familiar with the verification requirements and obtains necessary information from the CDE website.
2. Note verification deadlines so the process can be completed as required.
3. Utilize NutriKids support staff to help set up the program to help select applications, print letters, change status and remove or change student eligibility as necessary.

## **Meal Tracking**

The food service meal tracking system (NutriKids) appears to be working properly to track student meals. With accurate application processing and current direct certification matches, the district has more dependable student eligibility information. The NutriKids point of sale program links to the eligibility records in the database, allowing student meals to be tracked in the appropriate categories for reimbursement claims. Staff seems comfortable using the system and students have learned their ID numbers so they can be correctly and confidentially identified. FCMAT observed staff to be discreet with students' eligibility status.

King City High School serves meals from the main line inside the kitchen and three snack bar windows. All points of sale now have computers with the NutriKids program so meals are tracked correctly. The computers are networked so at the end of the day total meals can be consolidated. Greenfield High School has two parallel meal lines with point of sale computers linked to the database. It also serves an a la carte line in the cafeteria seating area.

The food service manager needs to continue to work closely with the district technology department and NutriKids support staff to ensure proper functioning of the program.

## Recommendations

*The district should:*

1. Ensure that the food service manager continues to work with staff to ensure proper use of the computer system and full understanding of the need for student confidentiality.
2. Require the food service manager to regularly review meal count data in the computer reports against manual records to ensure the system is tracking accurately.

## Menus and Production Records

The district follows the National School Lunch Traditional Food-Based Menu Planning option. This option specifies the types of foods (components) required for each meal. The components are meats, breads and grains, fruits and vegetables, and milk. Specific minimum portions based on age groups are required. Meals also must meet nutritional standards for calories, fat, saturated fat, and specific vitamins and minerals. Under the food-based plan the district itself does not have to analyze menus but will be held to those requirements at the time of the state program review (CRE/SMI). Therefore, it is important for the food service department to know if the menus meet the criteria. Charts defining these standards are included in the report. A high school age group may use the 4th-12th grade level (which the district uses) for components and for analysis, but the USDA recommends using the 7th-12th grade standards. The 7th-12th grade standards provide slightly larger portions of some items and extra calories, which are appropriate for high school age students.

The district has contracted with a company called Preferred Meals to assist in menu planning and provide all (ready-made) meals and all paper goods. Menus are written a month at a time, with district input. Printed copies of menus and production sheets with corresponding order sheets are sent to the district. As a service to the district, Preferred Meals performs a nutrient analysis of menus as planned and printed.

Nutrient analysis reports from Preferred Meals were reviewed and appear to follow protocol. However, since the district does not follow the menus as planned, the analysis cannot be considered accurate.

According to the food service manager, some of the entrées on current menus are not popular with the students so they are not served. The food service staff has substituted other entrées for the less popular ones. They also have taken great liberties with modifying the salad bar and fresh fruit offerings. For example, the production sheet lists salad mix, celery, carrots and oranges on the menu. But on the day of the FCMAT visit, students were served those items plus broccoli, cauliflower, apples, pears and bananas, and roasted potato wedges. None of these items were on the menu or production records. The menu also includes dessert or snack items daily, but the items served include many more choices than what is on the menu or recorded on the production sheet. These menu changes were not included in the nutritional analysis, but should be.

Menus need to be followed as planned and printed. Substitutions are allowed for shortages, food quality issues, etc., but should be the exception, not daily practice. Any substitutions should be included on the production sheets. Occasional substitutions do not need to be included in the analysis. However, if extra items are served daily they need to be accounted for. If the district wants to serve a variety of fruit daily, it should be included in the menu, on the production sheet and in the analysis.

Breakfast menus also are not followed as written. The menus are planned to have a cold item (muffin/cereal) on some days and hot items on other days, but district practice is to serve both every day. For example, on the day of FCMAT fieldwork the menu only listed pancake and sausage on a stick and juice.

However, students were served a turkey breakfast wrap, cereal with graham crackers, juice and a variety of fresh fruit. The production sheet said that 62 meals were served and listed 62 servings of turkey breakfast wrap. Yet observations indicated several students took cereal. They were not taking cereal and the hot entrée, so the production sheets do not reflect actual items served and the nutritional analysis will not be accurate. The production sheets should have listed the actual servings of cereal and hot entrées, and these combined totals should equal the number of meals claimed for that meal.

Menus are supposed to be followed as written, and production sheets must match menus and list exactly what was served and in what quantities. If occasional substitutions are made or leftovers are used, they must be listed on production sheets. If the planned menus are not what the students like or what the district wants to serve, they should be officially changed. The manager should work closely with Preferred Meals to create menus the students like and that fit the nutritional requirements.

In previous FCMAT observations (October 2010), many students took two entrées and did not pay extra for them. This appears to have improved greatly. A few students were taking two but paying for the second one. A few tried to sneak two, but most were caught by the staff. However, the staff does not seem to understand what constitutes a complete meal or the Offer vs. Serve concept. Many students were told they had to take milk even though they had a complete meal. Many students were taking two fresh fruits plus juice or were taking two to three portions of dessert items. They should just have one of each item. When the staff was asked about this, they did not understand that milk was not required. They did understand that students should only take one fruit but were not requiring compliance.

Offer vs. Serve is a method of giving students a choice of what they want to take for a meal. It is a requirement at the high school level. In the food-based menu plan the district must offer a minimum number of menu items, four at breakfast and five at lunch. Students may decline two items at lunch and one at breakfast. The students decide which items they will decline. Students are required to take an entrée but can decline any other components.

At King City High School the snack bar serves a slightly different menu than the main line (which has a salad bar). There are several entrée choices, but trays of side dishes are pre-assembled with fruit, chips and carrot sticks. The students must take this tray along with a choice of entrée and milk. This is not Offer vs. Serve. Students should be given the option of declining items of their choosing. A better way to handle this and stay in compliance is to have bowls of fruit, carrots and chips at the window, and students may choose an entrée plus a side (or sides) of their choice.

In speaking with the food service manager it seemed that either she does not understand the regulations regarding menus, production sheets or nutritional analysis or she feels it is the responsibility of Preferred Meals to meet the requirements. Preferred Meals is basically a food supplier that offers menu planning and analysis as part of the service. It is not a food service management company. It is the district's responsibility to monitor the program and make sure it meets regulations. The manager should take the initiative to work with Preferred Meals to create a menu the district is satisfied with and alert them to changes needed. Preferred Meals will adjust menus, production and order sheets as needed and will provide an analysis of the agreed-upon menu. The district needs to follow the menu as planned and record production sheets accurately.

If the manager does not understand the requirements she should review guidelines from the Department of Education or USDA or attend classes. The California Department of Education, Nutrition Services website ([cde.ca.gov/ls/nu](http://cde.ca.gov/ls/nu)) and the USDA website contain vast amounts of very useful information about all aspects of the Child Nutrition Program. The state offers an excellent course for new food service managers, the Child Nutrition Program Administration overview, that is being offered during the week

of June 20 in Sacramento. To register or obtain more information, contact Linda Sweeney at [lsweeney@casa.sjsu.edu](mailto:lsweeney@casa.sjsu.edu) or at 408-924-3125. A registration form may be downloaded from the San Jose State University Training Opportunities Web page at <http://www.nufs.sjsu.edu/calpronet/courses.htm>. Failure to follow menu protocols or nutritional standards can result in withholding of funds or even fines from the state, so it is vital that regulations are met.

During the upcoming state program review (CRE/SMI) the district will be expected to follow menus that meet nutritional standards and production records, and the menus will be reviewed for completeness and accuracy. The district may have to forfeit reimbursements if it is shown that the menus or production sheets do not meet requirements for reimbursable meals. Written checklists are available (see references) regarding compliance requirements. Usually state child nutrition consultants conduct workshops prior to reviews to remind districts of expectations. However, this is often just before the review, so the manager should obtain information and be prepared ahead of time.

Participation in the district's meal program is not very high considering the percentage of eligible students. As discussed in an earlier section, staff members commented that the students are not happy with menu choices. They have conducted a few small taste tests with foods from Preferred Meals but have not done a comprehensive survey to discover what students really think about the food. It would be a very good idea to survey students as to preferences and what would make them participate regularly. This should be done before menus are set for the upcoming year.

A la carte items were reviewed for compliance with the food sale regulations (SB 12). The actual snack items appear compliant, but many entrées are sold separately and may not meet the regulations. The district did not have nutritional information available for the entrées, so it could not be determined if they indeed meet standards. This information should be available from Preferred Meals. The manager should ask for this and keep a file on hand of all items served. This is a program requirement and may be evaluated during the state review.

Nutritional guidelines for a la carte snacks and entrées are included in this report. Basically, snacks must be 250 calories or less, 35% fat and 35 % sugar (by weight). Entrées must be no more than 400 calories and 4 grams of fat/100 calories (maximum of 16 grams or 36% fat). Preferred Meals states that its snacks fit guidelines, but it would be prudent for the district to verify. A calculator for checking snack foods is available at the following website: [http://www.californiaprojectclean.org/calculator\\_MH\\_S.asp?id=180](http://www.californiaprojectclean.org/calculator_MH_S.asp?id=180). The calculator does not include entrée guidelines, but those are much simpler to determine.

## **Recommendations**

*The district should:*

1. Ensure that the manager works closely with Preferred Meals to plan menus that students like and that fit regulations. Clearly communicate any needed changes to Preferred Meals.
2. Conduct surveys to determine student preferences. Complete the surveys before the end of the 2010-11 school year.
3. Follow planned menus and ensure that production sheets match menus and include all items served in the quantities used. Ensure that nutritional analysis matches menus served. Require the manager to become familiar with nutrient requirements, and periodically review nutritional analysis provided by Preferred Meals.
4. Educate staff and students in the concepts of complete reimbursable meals and Offer vs. Serve.

5. Request the nutritional information of all products used from Preferred Meals and keep it in a file or notebook. Review a la carte items for compliance before they are sold.
6. Ensure that the manager works with the state child nutrition consultant to learn what to expect during the state program review (CRE/SMI) expected in November 2011.
7. Require the manager to attend the Child Nutrition Program Administration course and review information on the Nutrition Services and USDA websites.

## ***Meal Participation***

The district has a very high needy population. The free and reduced percentages on the March reimbursement claim form indicate that Greenfield High School has 79% free and reduced students and King City High School has 62%. These students can eat at no cost or for the reduced rate of \$.30 for breakfast and \$.40 at lunch.

It is expected in a highly needy population that a large number of students will regularly eat the school meals. This is not the case in the King City JUHSD. Statistics from claim forms reviewed from January to March 2011 indicate that only 27% to 36% of Greenfield students are eligible for free and reduced, and 30% to 42% of King City students participate in the lunch meals. High schools generally see lower participations than elementary schools, but expectations for participation even with this age group should be 50% or higher.

The number of reduced students participating in the program is even lower: lunches indicate a participation rate of 18% to 21% at Greenfield and 20% to 29% at King City. Reduced breakfast participation is almost nonexistent, with only two to four reduced-price meals served each month and one to two each day at Greenfield. The district has the option to waive the reduced meal fees, and this sometimes encourages more participation. Higher participation would give the district much more income through reimbursement than it would lose in fees.

Breakfast participation is of special concern because participation numbers are 7% to 11% at Greenfield and 4% to 5% at King City. King City High School typically serves just 24 to 29 breakfasts daily and Greenfield between 48 and 81 breakfasts daily.

It is not a requirement to offer a breakfast program. Breakfast can also be served as just a sack meal offered as a quick grab-and-go item. An alternative location for breakfast service (such as a mobile cart in the school's entrance) may make the meal more convenient for students arriving late. A wireless computer setup may be necessary for this. Some schools have found great success serving breakfast at a later hour during a nutrition break, but the district doesn't have break times so this may not be feasible. Since over-staffing seems to be an issue and serving breakfast requires staff, the district may want to consider alternatives. There is no doubt that breakfast is an important meal for students, but if they are not participating it may not be worth the cost to the district.

## ***Recommendations***

*The district should:*

1. Study the reasons for such low participation given the needy population.
2. Consider waiving the price of reduced meals to encourage participation.



3. Consider eliminating the breakfast program or streamlining the menu and serving process to cut costs.
4. Consider strategic locations (such as the entrance to the school grounds) to serve a grab-and-go breakfast to capture more participants.
5. Consider modifying the class schedules for a mid-morning breakfast break.

### ***Food Cost Structure from Preferred Meals***

The district purchases all foods through Preferred Meals and charges \$.99 for breakfast and \$1.89 for lunch. The district purchases milk separately. The pricing structure is based on the number of entrées the district orders and all other food components (except milk), and all paper goods and cleaning supplies are included in that price. A la carte snack items and beverages are charged separately.

The district purchases milk from Foster Farms Dairy, paying an average of \$.21 per 8 oz. carton. This makes the food cost per meal \$1.21 at breakfast and \$2.10 at lunch.

Meal reimbursements (federal and state) amount to the following:

<b>Reimbursement Type</b>	<b>Breakfast</b>	<b>Lunch</b>
Free	\$1.96	\$3.20
Reduced	\$1.66	\$2.79 (+ .30 & .40 student costs)
Paid	\$.26 (+\$2.00 district price)	\$.26 (+ \$3.00 district price)

Meal costs are approximately 66% of reimbursements, which is on the high side. Ideally food costs should be in the 40% to 45% range. However, these meals are completely prepared and include all paper goods and cleaning supplies. They also include the service of creating menus, production sheets, order sheets and nutritional analysis reports. The district may be able to obtain better prices on its own but would have the added responsibilities that come with menu planning and purchasing. With the rapid creation of a new program, this was probably a sensible approach to take initially.

Student-paid meal prices seem appropriate at \$2.00 for breakfast and \$3.00 for lunch (and probably as high as students will pay). With the \$.26 federal reimbursement added on, the total cost equals reimbursements for free meals, which is the minimum the state recommends. Adult meal prices are \$.71 higher for breakfast and lunch, which is appropriate.

A la carte snack prices seem appropriate. However, the district should look at a la carte entrée prices. A muffin is sold at breakfast for \$.50 and cereal for \$1.00 – yet the district is paying \$.999 for them. Lunch a la carte entrées are sold for \$2.00, yet they cost the district \$1.89 each (not counting labor expenses). The district either needs to significantly increase a la carte entrée prices or only sell them as part of a complete meal.

To control food costs, care should be taken to prevent waste and over-ordering. The manager needs to pay close attention to usage and be familiar with the most popular items so ordering aligns with the meals served. Since the Preferred Meals price structure is based on entrées ordered, if the district over-orders entrées or orders extra to be sold a la carte, it is losing money.

Cost control is another reason to make sure students aren't taking more food items than allowed. They need to be encouraged to take a complete meal and all allowed components if desired. But they should not be

forced to take items they don't want if they already have a complete meal. They should not take double portions of any item (unless they pay extra). This issue is discussed in the menu section of the report.

## **Recommendations**

*The district should:*

1. Ensure that the manager is very familiar with product usage and orders food carefully to control costs.
2. Train the staff to prepare correct amounts of food and avoid waste. Training should include what constitutes a complete meal and Offer vs. Serve so staff don't encourage students to take extra, unnecessary items, adding to higher food costs.
3. Evaluate a la carte entrée prices and consider increasing the cost per item or only sell entrées with a complete meal.

## **Staffing and Productivity**

Prior FCMAT reviews expressed concern that the department was overstaffed based on both Preferred Meals labor recommendations (24.5 hours/day for the entire district) and an estimate of meals per labor hour (MPLH). In October, when the calculations were done, staff hours and meal numbers given to FCMAT were district estimates. At that time it was estimated that the district as a whole had an MPLH of 29. Since neither the labor hours nor meals served were accurate, the MPLH statistics cannot be considered valid either. In looking at data now available from Nutrikids for October, MPLH were really just 11 for the district average.

Since that time written staff schedules and accurate computerized meal counts have been made available. The total district hours (as of May 2) are 37.5 (plus four hours of the manager's time used in food service worker duties).

A current MPLH analysis was completed based on meal claim forms for January through March 2011 (see the attached spreadsheet). The department is planning to reduce labor hours beginning May 2, 2011 by six hours per day. Since the meal counts used were before labor hours were cut, the previous number of hours was used. Planned reduced labor hours were also calculated into the average meals to see if goals for higher productivity were met. Unfortunately, neither analysis showed satisfactory results. Greenfield's average daily meals (including a la carte equivalents) were 348. With the current hours at 22, Greenfield served just 15 meals per labor hour. The planned labor hours of 18 resulted in just 19 meals per labor hour.

King City's statistics are even lower. The school averaged 313 meals a day. Its current labor hours are 21/day and the planned labor hours are 19.5/day. Four manager hours a day were added to each of these totals because the manager provided FCMAT with that estimate for her time spent in food service worker duties. As a result, the total hours used for King City were 25 and 23.5. The reduction of 1.5 hours did not change the meals per labor hour equivalent, with 13 MPLH in both calculations.

The MPLH recommendation for a district using a completely premade menu system is 35 to 40. Both sites are significantly under this goal, which means they are significantly overstaffed. Site observations confirmed these statistics. Staff were unhurried in their duties and had work done well ahead of meal-times. At King City, three staff members were on duty at breakfast (7:30 a.m.). They serve approximately

26 meals to King City students and deliver 20 to Portola. One person could handle this workload. Staff was also prepping food for lunch, but this could have been done later in the day since prep is minimal with ready-made food.

Lunch was observed at Greenfield. Two identical (self-serve) lunch lines are provided for students, with a cashier at the end of each line. Normally an additional employee monitors the line, but she was absent. The lines went smoothly and students were served efficiently. It appears that the third person is not needed. Another employee sells a la carte items inside the cafeteria. Average daily sales are \$48. This may not be enough to warrant a third line. A la carte items could be sold in the meal lines if they were limited in variety.

It is more difficult in a high school program to cut labor significantly and still have enough points of sale to accommodate student needs. To meet recommendations of 35 to 40 MPLH, the district would have to cut labor by 50%, which is not realistic. It is also not realistic to use the original labor estimates from Preferred Meals (of 24.5 for the entire district). It may be that Preferred Meals' estimates were based on their experience with elementary schools, since King City is the company's first high school district.

Because of the problematic start-up the district experienced and the corresponding loss of revenue, a severe encroachment of the general fund is expected and labor costs must be contained. Further staff cuts should be considered; three to five hours less per site should be feasible. This won't put productivity at desired levels but is a start.

Work assignments need to be adjusted and staff needs to be trained in efficiency. Very little preparation is required with Preferred Meals, so fewer hours are needed. Staff is required mostly at mealtimes for managing point of sale computers. It may even be possible to reduce the number of points of sale at both sites without affecting student needs. At King City one less line may be possible in the snack bar, or the "floater" on the main line could be eliminated. At Greenfield it should be possible to eliminate the "floater" on the meal lines, or it may be feasible to sell a la carte items in meal lines instead of a separate line. The staff at the computers will need to be trained in determining if the students have chosen an appropriate complete meal.

If participation could be significantly increased, labor would be more balanced. The solution ultimately will be some further reduction of hours, increased participation, and more efficient use of staff time.

If the district were preparing its food instead of using Preferred Meals, food costs would likely be less and current labor would be less out of line with goals. Menus may be able to be planned more appropriately for the age group, with student preferences in mind. However, since the district is still in the start-up phase of the program and will receive a state audit, a change of this magnitude is not recommended at this time. This may be a consideration for the future. However, the district would then be responsible for menu planning, recipe development, production records and purchasing (including bids).

## **Recommendations**

*The district should:*

1. Consider further staff reductions of three to five hours at each site.
2. Reorganize staff duties and train in more efficient work habits.
3. Find ways to significantly increase participation so labor is more balanced with meals served.

4. After the state CRE audit, consider school-prepared food instead of purchasing it from a vendor such as Preferred Meals. Students may be happier with choices, food costs should be lower and staff hours would be more in line with requirements.

## ***Program Compliance***

The National School Meal Program is regulated both by USDA and the California Department of Education (CDE). The Nutrition Services Division of CDE monitors the program. The program is audited every five years (or more often if out of compliance). The audit is broken down into two parts:

1. The Coordinated Review Effort (CRE) – This audit covers general and specific program compliance including free and reduced eligibility, counting and claiming of meals, breakfast and lunch program, menus, sanitation and wellness policy.
2. The School Meals Initiative (SMI) – This audit focuses on the nutritional aspects of the program that include recipes, menus, menu production records, nutritional analysis and educational activities.

The district will receive its first CRE/SMI in fall 2011, tentatively scheduled for November. Since it is considered a new program, it likely will be reviewed very carefully for compliance. Areas found out of compliance will require corrective action plans by the district.

Compliance issues that relate to incorrect eligibility determination, meal counts or menus not meeting standards for a complete meal may result in fiscal action. This is why it is critical that the application processing, computer eligibility data and point of sale process are as accurate as possible. Likewise, it is essential that menus are planned according to nutrition requirements, served as planned and documented completely on production records.

Detailed information on both of these reviews can be found on the CDE website under the Nutrition Services section. The district should review detailed requirements and make sure its program is in compliance. The food services manager should become familiar with requirements and train staff in the essentials of the program. As mentioned in a previous section, the district should consider sending the manager to the Child Nutrition Administration course. The manager should also work closely with her state child nutrition consultant to help interpret requirements and answer questions.

## ***Recommendations***

*The district should:*

1. Ensure that the food service manager becomes familiar with program requirements and what is expected for the CRE/SMI.
2. Carefully review district practice vs. requirements well ahead of the CRE.

## ***Budget Concerns***

According to April 2011 budget figures, the district projects a transfer of at least \$364,000 into the cafeteria budget. This is 65% of total revenue. Contributing factors include the delay in filing for a child nutrition program with the state, low participation and excessive labor hours. The district lost four

months of reimbursement revenue because it could not claim meals. During this time food and labor expenses were accruing from meals served.

Food costs are budgeted at \$304,000, which is 54% of the total budget, and labor and benefits add up to \$200,904, or 36%. Generally, food and labor should each equal approximately 40% of the budget. Food costs are high partly because of the relatively expensive Preferred Meals plan and possibly because of over-ordering. The meal costs are based on the number of entrées ordered and the menus have several entrée choices daily. If close attention is not paid to actual usage, costs could easily accelerate. Accurate production records can be immensely helpful in understanding usage.

Labor costs of 36% do not usually indicate overstaffing, but with the simplicity of the menu, high cost of food and low participation in the program, labor costs should be lower. The meals-per-labor-hour statistics indicate severe overstaffing for the number of meals served.

Ideally, a child nutrition program should be self-funded and should not need subsidies from the general fund. The department has significant work to do to achieve this goal. The only way to reverse the current trend is to significantly increase participation or reduce food and labor costs. With the highly needy population, reimbursements could be significant with more students using the program. As discussed in other sections of this report, staff efficiencies need to be improved, as do ordering procedures and waste control.

## **Recommendations**

*The district should:*

1. Consider staff reductions and improve staff efficiency.
2. Pay close attention to food ordering and waste.
3. Consider other food procurement options, although this would not be advisable until after the 2011-12 program review.
4. Find opportunities to improve participation so revenues increase.

## **Summary of Progress and Overall Recommendations for Improvement**

Since the October FCMAT review, the district has improved in many areas:

- The program application was completed and approved so meal reimbursements could be claimed beginning January 1, 2011.
- New lunch applications were filled out by families and processed using the Nutrikids computer program. Most appear to be accurately processed but need to be carefully double checked.
- The technology staff assisted in completing the direct certification process, automatically qualifying categorically eligible students for the free and reduced meal program and matching them to the district database.
- The Nutrikids computers were installed at all points of meal service to track meals. Students input ID numbers to access accounts and for confidentiality. This program is linked to current eligibilities determined from direct certification and applications, so counts are accurately categorized.

- Staff seem to understand how to use the computers and do not overtly identify students' eligibilities.
- Staff has adjusted cash counting procedures so two employees count money. This is the planned method but it doesn't always occur if staff is shorthanded. This should occur daily regardless of staffing issues. Other staff members should be trained in this process.

Areas needing improvement:

- Menus need to be planned for student preferences and must be precisely followed. Any menu changes need to be coordinated with Preferred Meals so printed menus, production sheets and analysis match actual practice.
- Production records need to be completed, listing all food items, quantities served and leftovers. They need to match planned menus.
- Nutritional analysis of menus needs to reflect menus as served. Preferred Meals does the analysis and cannot provide accurate information without knowing what is actually served.
- Lunch applications need to be carefully processed and double checked for accuracy. A few errors were noted in a brief review of applications. Errors in eligibility determination can result in fiscal action from the state.
- Food service staff need training in identifying a complete meal, understanding Offer vs. Serve and in efficient work habits.
- The food service manager needs training in many aspects of the child nutrition program – menu planning, production records, nutrition standards of meals and a la carte items, eligibility determination, and overall program management.
- The district and food service manager need to review guidelines for the CRE/SMI (state program audit) to make sure they follow all regulations and know what to expect.

## ***Attachments***

- Guideline for nutritional standards for a la carte sales
- Meal Patterns for Breakfast and Lunch for Traditional Food-Based Option
- Nutrition Standards for Breakfast and Lunch for Traditional Food-Based Option
- Meals per labor hour worksheet
- CRE/SMI Guidelines

Should you have any questions or comments regarding the content of this letter, please contact me at (661) 636-4611 or [mbarlow@fcmat.org](mailto:mbarlow@fcmat.org).

Sincerely,



Mary Barlow  
Deputy Administrative Officer

**LAWS REGARDING FOOD SALES TO STUDENTS  
FOOD AND BEVERAGE REQUIREMENTS SB 12 & SB 965  
EFFECTIVE JULY 2007**

**FOOD SALES AT ALL SITES**

- Must have sales approved by the Governing Board
- Must comply to the California Health Code Regulations
- May not be prepared on campus or in private homes (only commercially prepared and packaged food)
- Must meet the Food and Beverage requirements in SB 12 & SB 965 if sold during school day (see below)
- Foods that do not meet SB12 & SB965 may be sold either off campus or 1/2 hour after end of school day
- Laws apply to cafeteria sales, student and organization sales and vending machines

**ELEMENTARY SCHOOLS**

- No food sales at lunch or lunch recess
- Limited to 4 sales/year and one food item per sale.
- Food item cannot duplicate food sold in school cafeteria on that day.

**MIDDLE & HIGH SCHOOLS**

- 1 organization per day (e.g., student store/ASB) may sell everyday (no more than 3 types of foods.)
- 4 days during the year, multiple organizations may sell approved foods (all on the same 4 days).
- Food item cannot duplicate food sold in school cafeteria on that day

**SB 12 / SB 965:**

**Restricts food & beverages sales**  
during the school day to the following:

**Full Meals or:**

**A la carte items,** (individual portion sizes) of

- Nuts/seeds, eggs, cheese, fruit, & non-fried vegetables.

**Dairy and grain products**

(e.g., yogurt, ice cream, muffins granola bars)  
may be sold a la carte, if:

Maximum of:

- 175 calories
- 35% of calories from fat
- 10 % of calories from saturated fat
- 35% of weight from sugar

**Beverages:**

- Water with no sweeteners added
- Low fat or non fat milk, including flavored milk
- Vegetable & fruit juice: min. 50% juice & no added sweeteners

**SB 12 / SB 965:**

**Restricts a la carte food & beverage sales**  
during the school day to the following:

**SNACKS are limited to a maximum of:**

- 250 calories per item.
- 35% of calories from fat (exception of nuts, nut butters, seeds, eggs, single serving cheese, fruit, & non-fried vegetables)
- 10% of calories from saturated fat
- 35% of weight from sugar

**ENTREES are limited to maximum of:**  
(except in a reimbursable meal)

- 400 calories
- 4 grams of fat per 100 calories (36% fat)
- Must be categorized in the National School Lunch or breakfast program as an entrée.

**Beverages:**

- Same as elementary plus:  
Electrolyte replacement beverage  
(max 42 grams sugar/20 oz.)

## School Breakfast Meal Pattern

Traditional and Enhanced Food-Based Menu Planning Options for School Breakfast Program.

Components	Food Items/Servings	AGES 1-2 YRS	PRE- SCHOOL	GRADES K-12	GRADES 7-12*
Grains/Breads**	<ul style="list-style-type: none"> <li>Serve one of the following items or combine them to meet the requirements: whole-grain or enriched bread, biscuit, roll, muffin, or cereal.</li> <li>Examples of serving sizes can be found in the <a href="#">United States Department of Agriculture (USDA) Food Buying Guide (Outside Source)</a>.</li> </ul>	½ serving	½ serving	1 serving	1 serving
Meat/ Meat Alternates**	<ul style="list-style-type: none"> <li>Serve one of the following items or combine them to meet the requirements: meat, poultry, fish, cheese, egg, or yogurt.</li> <li>Examples of serving sizes can be found in the <a href="#">USDA Food Buying Guide (Outside Source)</a>.</li> </ul>	½ ounce	½ ounce	1 ounce	1 ounce
Fruits/Vegetables	<ul style="list-style-type: none"> <li>Include a minimum of one serving.</li> <li>A serving can be fruit or vegetable or both, or full-strength fruit or vegetable juice.</li> </ul>	¼ cup	½ cup	½ cup	½ cup
Milk (Fluid)	<ul style="list-style-type: none"> <li>Served as a beverage or on cereal, or both.</li> </ul>	4 fl oz	6 fl oz	8 fl oz	8 fl oz

\* Grades 7-12: This is an optional age/grade group under the Enhanced Food-Based Menu Planning Option. Recommended, but not required.

\*\*Select one serving from each of the two components to equal one grain/bread AND one meat/meat alternate OR select two servings from one of the components to equal two grains/breads OR two meat/meat alternates.

Questions: Nutrition Services Division | 800-952-5609

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California Department of Education  
1430 N Street  
Sacramento, CA 95814

Last Reviewed: Wednesday, July 21, 2010



TRADITIONAL FOOD-BASED MENU PLANNING APPROACH—MEAL PATTERN FOR LUNCHES					
MINIMUM QUANTITIES					RECOMMENDED QUANTITIES
FOOD COMPONENTS AND FOOD ITEMS	GROUP I AGES 1-2 PRESCHOOL	GROUP II AGES 3-4 PRESCHOOL	GROUP III, AGES 5-8 GRADES K-3	GROUP IV AGES 9 AND OLDER GRADES 4-12	GROUP V AGES 12 AND OLDER GRADES 7-12
Milk (as a beverage)	6 fluid ounces	6 fluid ounces	8 fluid ounces	8 fluid ounces	8 fluid ounces
Meat or Meat Alternate (quantity of the edible portion as served):					
Lean meat, poultry, or fish	1 ounce	1 ½ ounces	1 ½ ounces	2 ounces	3 ounces
Alternate Protein Products <sup>1</sup>	1 ounce	1 ½ ounces	1 ½ ounces	2 ounces	3 ounces
Cheese	1 ounce	1 ½ ounces	1 ½ ounces	2 ounces	3 ounces
Large egg	½	¾	¾	1	1 ½
Cooked dry beans or peas	¼ cup	3/8 cup	3/8 cup	½ cup	¾ cup
Peanut butter or other nut or seed butters	2 tablespoons	3 tablespoons	3 tablespoons	4 tablespoons	6 tablespoons
Yogurt, plain or flavored, unsweetened or sweetened	4 ounces or ½ cup	6 ounces or ¾ cup	6 ounces or ¾ cup	8 ounces or 1 cup	12 ounces or 1 ½ cups
The following may be used to meet no more than 50% of the requirement and must be used in combination with any of the above:					
Peanuts, soynuts, tree nuts, or seeds, as listed in program guidance, or an equivalent quantity of any combination of the above meat/meat alternate (1 ounce of nuts/seeds = 1 ounce of cooked lean meat, poultry, or fish)	½ ounce = 50%	¾ ounce = 50%	¾ ounce = 50%	1 ounce = 50%	1 ½ ounces = 50%
Vegetable or Fruit: 2 or more servings of vegetables, fruits or both	½ cup	½ cup	½ cup	¾ cup	¾ cup
Grains/Breads: (servings per week): Must be enriched or whole grain. A serving is a slice of bread or an equivalent serving of biscuits, rolls, etc., or ½ cup of cooked rice, macaroni, noodles, other pasta products or cereal grains	5 servings per week <sup>2</sup> -- minimum of ½ serving per day	8 servings per week <sup>2</sup> -- minimum of 1 serving per day	8 servings per week <sup>2</sup> -- minimum of 1 serving per day	8 servings per week <sup>2</sup> -- minimum of 1 serving per day	10 servings per week <sup>2</sup> -- minimum of 1 serving per day

<sup>1</sup> Must meet the requirements in appendix A of this part.

<sup>2</sup> For the purposes of this table, a week equals five days.

## Traditional and Enhanced Meal Patterns: Breakfast

### Required Grade Groups

Preschool

Grades K-12

Optional Grades 7-12 for Enhanced Food-Based  
Menu Planning.

Minimum Nutrient and Calorie Levels for School Breakfast  
Enhanced and Traditional Food-Based Menu Planning Approach  
(School Week Averages)

Nutrient and Energy Allowances	Preschool	Grades K-12	Optional Grades 7-12 for Enhanced Meal Pattern
Energy Allowances (calories)	388	554	618
Total fat	<sup>1</sup>	<sup>1</sup>	<sup>1</sup>
Saturated fat	<sup>2</sup>	<sup>2</sup>	<sup>2</sup>
Protein (g)	5	10	12
Calcium (mg)	200	257	300
Iron (mg)	2.5	3.0	3.4
Vitamin A (RE)	113	197	225
Vitamin C (mg)	11	13	14

<sup>1</sup> Total fat not to exceed 30 percent of calories

<sup>2</sup> Saturated fat to be less than 10 percent of calories

MINIMUM NUTRIENT AND CALORIE LEVELS FOR SCHOOL LUNCHES TRADITIONAL FOOD-BASED MENU PLANNING APPROACH (SCHOOL WEEK AVERAGES)				
NUTRIENTS AND ENERGY ALLOWANCES	MINIMUM REQUIREMENTS			RECOMMENDED
	GROUP II PRESCHOOL AGES 3-4	GROUP III GRADES K-3 AGES 5-8	GROUP IV GRADES 4-12 AGES 9 AND OLDER	GROUP V GRADES 7-12 AGES 12 AND OLDER
Energy allowances (calories)	517	633	785	825
Total fat (as a percentage of actual total food energy)	1	1.2	2	2
Saturated fat (as a percentage of actual total food energy)	1	1.3	3	3
RDA for protein (g)	7	9	15	16
RDA for calcium (mg)	267	267	370	400
RDA for iron (mg)	3.3	3.3	4.2	4.5
RDA for Vitamin A (RE)	150	200	285	300
RDA for Vitamin C (mg)	14	15	17	18

<sup>1</sup> The Dietary Guidelines recommend that after 2 years of age "...children should gradually adopt a diet that, by about 5 years of age, contains no more than 30 percent of calories from fat."

<sup>2</sup> Not to exceed 30 percent over a school week

<sup>3</sup> Less than 10 percent over a school week

MEAL AND LABOR COMPARISONS									
(MPLH)									
Jan - Mar 2011									
	King City				Greenfield				
	Includes Portola & Transition								
	Jan	Feb	Mar	3 Mo Avg	Jan	Feb	Mar	3 Mo Avg	
<b>Bkft/Day</b>	24	26	29	26	49	61	61	57	
<b>Lunches/Day</b>	182	235	255	224	201	257	271	243	
<b>Total Meals/Day</b>	206	261	284	250	250	318	332	300	
<b>A la Carte \$/Day</b>	\$ 141	\$ 161	\$ 156	\$ 153	\$ 20	\$ 63	\$ 61	\$ 48	
<b>A la Carte Equivalents</b>	56	64	69	63	8	25	27	\$ 48	
<b>Total Meal Equiv.</b>	262	325	353	313	258	343	359	348	
<b>LABOR HOURS*</b>	25	25	25	25	22	22	22	22	
<b>MPLH (w/ 'old hours')</b>	10	13	14	13	12	16	16	15	
<b>New Labor Hrs (effective May 1)</b>				23.5				18	
<b>MPLH w/ new labor hours</b>				13				19	
<b>Labor Hrs @ K.C. include 4 hrs of Debi Lesly</b>									

**ADMINISTRATIVE REVIEW GUIDANCE**

THE INFORMATION BELOW WILL HELP YOU PREPARE FOR REVIEW: PLEASE HAVE RECORDS FOR SITES SELECTED FOR REVIEW:

- Column (1) lists the Compliance Areas that will be reviewed.
- Column (2) details the documents you must make available to the reviewer.
- Column (3) is provided for you as a checklist for documents that are ready.
- Column (4) gives additional information to help you prepare for review.

<b>(1) COMPLIANCE AREA TO BE REVIEWED</b>	<b>(2) THE AGENCY SHOULD HAVE THESE DOCUMENTS AVAILABLE</b>	<b>(3) AGENCY (✓) CHECKLIST</b>	<b>(4) ADDITIONAL INFORMATION</b>																		
<p><b>SITE SELECTION</b></p> <p>The number of sites to be reviewed is determined by Table A.</p>	<p>ATTACHMENT A, "Site Selection Worksheet"</p> <p>ATTACHMENT B, "Site Selection-Schools With Tracks"</p> <p>TABLE A</p> <table border="1" data-bbox="532 1094 751 1629"> <tr> <td>Total Number of Sites</td> <td>Minimum Sites to be Reviewed</td> </tr> <tr> <td>1 - 5</td> <td>1</td> </tr> <tr> <td>6 - 10</td> <td>2</td> </tr> <tr> <td>11 - 20</td> <td>3</td> </tr> <tr> <td>21 - 40</td> <td>4</td> </tr> <tr> <td>41 - 60</td> <td>6</td> </tr> <tr> <td>61 - 80</td> <td>8</td> </tr> <tr> <td>81 - 100</td> <td>10</td> </tr> <tr> <td>101 or more*</td> <td>12</td> </tr> </table> <p>*plus 5% of the number over 100</p>	Total Number of Sites	Minimum Sites to be Reviewed	1 - 5	1	6 - 10	2	11 - 20	3	21 - 40	4	41 - 60	6	61 - 80	8	81 - 100	10	101 or more*	12		<ul style="list-style-type: none"> <li>• All sites must be reviewed which meet CRE's criteria of a free Average Daily Participation (ADP) of 100 or more and a free Participation Factor (PF) of 100% or more (100/100). The total of the sites to be reviewed may exceed the number of sites to be selected using Table A.</li> <li>• If the number of sites using USDA's 100/100 criteria is less than the number to be selected using Table A, then:             <ul style="list-style-type: none"> <li>○ Selection of additional sites to meet the minimum number required must be based on an free ADP of 100 or more and a free PF of the following:                 <ul style="list-style-type: none"> <li>▪ 97% for elementary schools</li> <li>▪ 87% for combination (of elementary and high)</li> <li>▪ 77% for high schools</li> </ul> </li> </ul> </li> <li>• (PF = meals claimed divided by number of serving days divided by the number eligible)</li> <li>• If the required minimum number of sites to be reviewed (based upon the total number of sites in the agency) is not met by the above criteria, additional State Agency (SA) criteria will be used to select the remaining number of sites required.</li> </ul>
Total Number of Sites	Minimum Sites to be Reviewed																				
1 - 5	1																				
6 - 10	2																				
11 - 20	3																				
21 - 40	4																				
41 - 60	6																				
61 - 80	8																				
81 - 100	10																				
101 or more*	12																				
<p><b>CRITICAL AREA</b></p> <p>PERFORMANCE STANDARD 1</p> <p>PART 1</p> <p>CERTIFICATION AND BENEFIT ISSUANCE</p> <p>Each child's application for free and reduced-price lunches is correctly approved or denied in accordance with the application provision of 7 CFR Part 245</p>	<p>A. Eligibility applications for each site selected for review for the month of review.</p> <p>B. Any CalWORKS, FDIPIR, Kin Gap, Migrant, Homeless or Food Stamp direct certification documentation.</p> <p>C. Any migrant homeless or runaway approved documentation.</p> <p>D. Rosters or other benefit issuance documentation for the review month for sites selected.</p> <p>E. Copy of current guidelines and instructions for correct completion of applications.</p> <p>F. The letter to parents explaining the free and reduced price policy.</p> <p>G. Eligibility rosters from home school districts/sites for inter-session/visiting students included in meal counts.</p> <p>H. School year calendar with serving days by site and, if applicable, track.</p>		<ul style="list-style-type: none"> <li>• Sites with year round education: Applications must have an indication of the appropriate track.</li> <li>• Agencies that file applications by family for children at multiple sites: Include original or copies of applications for the children attending the site reviewed.</li> <li>• All sites:             <ul style="list-style-type: none"> <li>○ Include applications for students who have withdrawn or transferred out since the review month.</li> <li>○ Include applications pulled for verification for the review sites.</li> <li>○ Include list of students directly certified. Include County Welfare Department's official certification. Include migrant homeless or runaway approval documentation.</li> <li>○ Rosters must show changes to eligibility made within the required time frames (within 3 operating days for increased benefits, must give 10 calendar days for decreased benefits, i.e. F to D, R to D, and F to R).</li> <li>○ It is helpful if the filing system used for applications matches the roster order.</li> </ul> </li> </ul> <p>Reference: 7 CFR 210.18</p> <p><b>FISCAL ACTION MAY BE TAKEN IF:</b></p> <ul style="list-style-type: none"> <li>• A site's eligibility applications or other certification documentation relevant to the review month are not complete, correct and available for review.</li> <li>• Rosters or other benefit issuance documents for each month are not consistent with eligibility documentation.</li> </ul>																		

Legend of Acronyms: 7 CFR = Title 7 Code of Federal Regulations FNS = Food and Nutrition Service  
 CRE = Coordinated Review Effort MB = Management Bulletin  
 EC = California Education Code NSD = Nutrition Services Division

NSLP = National School Lunch Program  
 SHAPE = Shaping Health as Partners in Education  
 USDA = United States Departments of Agriculture

1) COMPLIANCE AREA TO BE REVIEWED	(2) THE AGENCY SHOULD HAVE THESE DOCUMENTS AVAILABLE	(3) AGENCY (✓) CHECKLIST	(4) ADDITIONAL INFORMATION
<p><b>CRITICAL AREA</b> PERFORMANCE STANDARD 1</p> <p>PART 2 COUNTING AND CLAIMING</p> <p>All free, reduced price, and paid lunches claimed for reimbursement are served only to children eligible for free, reduced price, and paid lunches, respectively; and are counted, recorded, consolidated and reported through a system which consistently yields correct claims.</p>	<p>A. The completed reimbursement claim form for all the months in the current program year.</p> <p>B. Daily meal count records and monthly meal count totals reported separately by site, for all months from the first month in session after June 30 through the review month for the current year for sites selected for review.</p> <p>C. Written collection procedures which describe adequate meal count systems as implemented at the sites selected for review.</p> <p>D. Agency's average daily attendance figure for the entire district and/or sites selected for review, if used for edit checks.</p>		<ul style="list-style-type: none"> <li>An adequate counting system is one that meets the following criteria: <ul style="list-style-type: none"> <li>Provides accurate point of service (the point at which it may be determined that a complete, reimbursable meal HAS BEEN SERVED), meal counts of the number of reimbursable free, reduced price, and paid meals served to eligible children on a daily basis.</li> <li>Records and reports those counts accurately to the agency;</li> <li>Prevents overt identification of the eligible needy; and,</li> <li>Is monitored by agency to ensure internal controls exist.</li> </ul> </li> </ul> <p>Reference: 7 CFR 210.18</p> <p><b><u>FISCAL ACTION MAY BE TAKEN IF:</u></b> <i>A site's meal count system fails to meet the above criteria.</i></p>
<p><b>CRITICAL AREA</b> PERFORMANCE STANDARD 2</p> <p>MEAL ELEMENTS</p> <p>Lunches claimed for reimbursement contain meal elements (food items and components, menu items or other items) as required under 7 CFR 210.10</p>	<p>A. Daily listed menus for the month of review listing all required food items and components or menu items.</p> <p>B. Menu records or other documentation for the review period that clearly indicate that all required food items and components or menu items are offered for daily and weekly requirements.</p>		<ul style="list-style-type: none"> <li>Ensure that for all sites and meal types the menu planning option is correct in the CNIPS.</li> <li>Meals observed during review must contain required number of food items and components or menu items according to the menu planning option for the site(s).</li> <li>Lunches claimed provide adequate calories and other nutrients as required by program regulations</li> </ul> <p>References: 7 CFR 210.10 and 210.18</p> <p><b><u>FISCAL ACTION MAY BE TAKEN IF:</u></b> <i>A site's menu or meal service fails to meet the above criteria.</i></p>
<p><b>GENERAL AREA 1</b></p> <p>FREE AND REDUCED PRICE PROCESS AND VERIFICATION</p>	<p>A. Free and reduced price policy statement (include ATTACHMENT C Meal Count/Collection Procedures for Lunch and Breakfast).</p> <p>B. ATTACHMENT D – District or Agency Verification Summary</p> <p>C. ATTACHMENT E – Verification Findings by Individual Student. Include the following:</p> <ol style="list-style-type: none"> <li>Copies of the free and reduced-price applications selected for verification</li> <li>Documentation used to verify each application prior to November 15 of each year.</li> <li>Electronic verification summary submitted to the State and backup documentation.</li> <li>Records showing that eligibility changes are made within required number of days – 3 operating days for increased benefits (R to F), 10 calendar days for decreased benefits (F to R, F to D or R to D).</li> </ol> <p>D. Evidence of no overt identification of the needy students.</p>		<ul style="list-style-type: none"> <li>Policy Statements and Agreements <b>MUST BE KEPT UNTIL REPLACED</b> by new documents. Since these documents have no expiration date they are valid until replaced.</li> <li>Renewal Annual Participation Statements and other yearly documentation must be available for 3 years plus the current year.</li> <li>Collection Procedures need to on hand as reference documents at each site. The district's plan for direct certification should be included. The County Welfare Department's official certification letter with a signature and date should be available for review. Changes to collection procedures must be sent to the reviewer.</li> <li>Provide annual verification report submitted to the State.</li> </ul> <p>Reference: 7 CFR 245</p> <p><b><u>FISCAL ACTION MAY BE TAKEN IF:</u></b> <i>Benefit changes from verification are not made within required time frames.</i></p>

(1) COMPLIANCE AREA TO BE REVIEWED	(2) THE AGENCY SHOULD HAVE THESE DOCUMENTS AVAILABLE	(3) AGENCY (N) CHECKLIST	(4) ADDITIONAL INFORMATION
<p><b>GENERAL AREA 2</b> MEAL PATTERNS/ NUTRIENT STANDARDS</p>	<p>A. Menu Planning Approach chart or elements/nutrient standard chart that is followed at each site. B. Menu Production and Transport Records for the month selected for review including portion size and quantity of food used. C. Current specifications or product analyses for commercial prepared food items used for the review month. D. Standardized recipes used in food preparation for the month of review. E. Food purchase invoices and inventory records for the foods served in the month of review. F. Nutrient analyses for review period and day of review, if applicable</p>		<ul style="list-style-type: none"> <li>Agency shall ensure the following:                             <ul style="list-style-type: none"> <li>Sufficient quantities of food are planned and produced so that lunches provided contain all the required meal elements in at least the amounts indicated in the appropriate site lunch pattern.</li> <li>The weight and portion size of grain/bread servings are documented.</li> <li>Records are kept to prove that lunches contain adequate calories and other nutrients as required by program regulations.</li> <li>Foods as part of the reimbursable meal must not be fried and contain less than .5 grams artificial trans fat. Ed Code 49430.7, MB NSD-NSP 04-2008</li> </ul> </li> </ul> <p>NOTE: This area will be covered in depth in the School Meals Initiative Review. References: 7 CFR 210.18 and <i>Healthy School Meals Training Manual</i></p>
<p><b>GENERAL AREA 3</b> CIVIL RIGHTS AND CHILDREN WITH SPECIAL NEEDS</p> <p>Agencies shall comply with requirements of Title VI of the Civil Rights Act of 1964, the Americans with Disabilities Act of 1991, and Section 504 of the Rehabilitation Act of 1973.</p>	<p>The Civil Rights Coordinator for the agency should be prepared to answer questions about the following: A. Civil rights poster prominently displayed (to program participants). B. Program materials showing the non-discrimination statement. C. Public release announcing the availability of the lunch program as sent to public media and community/grass roots organizations. D. Foreign language translations of program materials when a significant number of persons in the population speak only a foreign language. E. Written complaint procedure for Child Nutrition Programs to handle complaints alleging discrimination. F. Evidence that admission procedures do not restrict enrollment of minority persons. G. Evidence to prove that minority applications are denied correctly and appropriately. H. Racial/Ethnic data of participants by site. CBEDS reports are acceptable. I. Evidence that handicapped students have equal access to the Program. J. Medical documentation on file for special diets for children with specific food needs. Documentation on menu production sheets/transport records for special dietary foods served.</p>		<ul style="list-style-type: none"> <li>The following nondiscrimination statement is to be posted in all administrative office and food service areas and included in program materials:   <b>In accordance with Federal law and United States Department of Agriculture (USDA) policy, this institution is prohibited from discriminating on the basis of race, color, national origin, sex, age, or disability.</b>   <b>To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, D.C. 20250-9410 or call (202) 720-5964 (voice and TDD). USDA is an equal opportunity provider and employer."</b> </li> <li>The following short statement may be used on a one page flyer, public service announcement, the Internet or other media:   <b>"This institution is an equal opportunity provider "</b> </li> <li>The non-discrimination statement does not have to be on menus</li> </ul> <p>References: MB 99-600 (Contains a current sample of the "AND JUSTICE FOR ALL" poster, must post 11x17) , MB USDA CNP 03-2008 (Nondiscrimination Statement), MB 99-601 (Complaint Procedures) and MB 03-107 (Special Dietary Needs)</p>

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<p><b>GENERAL AREA 4</b> MONITORING SITE RESPONSIBILITIES/ SANITATION</p>	<p>A. Site Monitoring of Meal Counts for Reimbursable Meals: Site monitoring reports for agencies with multiple sites, including corrective action needed and completion dates. See ATTACHMENT F for a sample monitoring report.</p> <p>B. Meal Count Edit Checks: Completed daily meal count edit checks by site for the month of review. See ATTACHMENT G and H for sample edit check formats.</p> <p>C. Safety and Sanitation</p> <ol style="list-style-type: none"> <li>1. Health Permit posted in kitchen or documentation of local alternative.</li> <li>2. Public advisement that a copy of the most recent inspection report is available upon request.</li> <li>3. Reports of ongoing inspections and documentation that non-compliance findings were resolved. Two health inspections required per program year per site. If not, documentation that you requested two inspections per year from the local health department.</li> <li>4. HACCP-based food safety plan, which includes Standard Operating Procedures (SOPs) and HACCP principles. Documentation that the plan has been implemented.</li> <li>5. Evidence that at least one employee AT EACH SITE is a "certified food handler" and has passed an approved food-safety examination</li> <li>6. Documentation that the site meets the definition of a satellite food distribution facility (one that serves only prepackaged food, beverages and whole fruit is therefore exempt from "certified food handler" requirement).</li> </ol>		<ul style="list-style-type: none"> <li>• Site monitoring: Must be completed by February 1 in each Program year.</li> <li>• Edit Checks: Before submitting the monthly reimbursement claim, each agency must "edit check" meal counts by comparing each site's DAILY free and reduced price meal counts with: <ul style="list-style-type: none"> <li>o Total number of children currently approved for free and reduced price meals</li> <li>o The number of children currently approved for free and reduced price meals times the current federal attendance factor.</li> <li>o The site or agency attendance factor, which must exclude excused absences, may be used in place of the national attendance factor.</li> </ul> </li> <li>• Submitted claims will be "edit-checked" using the current National factor (times) the days meals were served (times) the number eligible by category. If you are using site specific or agency attendance factor and reported counts exceed the SA edit checks, you will receive a notice of potential overclaim. You are responsible for the analysis of supporting meal count data to determine if claim adjustment is required.</li> <li>• Agencies must comply with the <i>California Retail Food Code</i>.</li> <li>• Thermometers must be placed in each refrigerator and freezer.</li> <li>• HACCP-based food safety plan may be modeled after USDA Guidance for School Food Authorities located at <a href="http://www.fns.usda.gov/fns/food_safety.htm">http://www.fns.usda.gov/fns/food_safety.htm</a></li> </ul> <p>References: 7 CFR 210.13 (Food Safety Inspection) and 210.18(h)(5) (Reporting and Recordkeeping), California Health and Safety Code Division 104, Part 7, Chapter 4 and MB 99-808 on Food Safety Certification, Information Sheets #22 and #23</p>
<p><b>GENERAL AREA 5</b> REPORTING AND RECORD KEEPING</p>	<ol style="list-style-type: none"> <li>A. Agreements and policy statements.</li> <li>B. Verification procedures.</li> <li>C. Monthly enrollment, free and reduced price eligible data.</li> <li>D. Meal count data by site: edit checks, on-site reviews, internal controls.</li> <li>E. Claims for reimbursement and supporting data.</li> <li>F. Menu and food production records.</li> <li>G. Revenue and expense records including net cash resources.</li> <li>H. Audit reports and written responses.</li> <li>I. Civil rights complaints and resolutions.</li> <li>J. Corrective action documentation.</li> <li>K. Agenda and sign-in sheet from annual training of staff on civil rights and meal counting procedures.</li> </ol>		<ul style="list-style-type: none"> <li>• Agreements and policy statements must include: <ul style="list-style-type: none"> <li>o Copy of the SA recommended free and reduced price application or an approved alternate.</li> <li>o Copy of the letter to households.</li> <li>o Written collection procedures.</li> <li>o Direct Certification Agreement, plan and procedures for free meals, if applicable.</li> <li>o If used, request to implement Claiming Provision 1, 2, or 3.</li> <li>o Agreements MUST BE KEPT UNTIL REPLACED by a new agreement. NSLP and SBP agreements are permanent.</li> <li>o Agency records must be kept for a period of 3 years after submission of the final Claim for Reimbursement for the fiscal year. If audit findings have not been resolved, the records must be kept beyond the 3-year period, for as long as required for resolution of the issues raised by the audit.</li> <li>o Net cash resources can not exceed three months' operating expenses.</li> </ul> </li> </ul> <p>References: 7 CFR 210.23(c) and <i>School Nutrition Program Guidance Manual</i></p>



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<b>PROGRAM AREA 6</b> STATE MEAL MANDATE (Public Schools Only)	A. Evidence that meals are provided to all eligible needy pupils in kindergarten through grade twelve, including continuation high schools and other special schools or documentation of an approved waiver. B. Evidence that nutritionally adequate meals are available on all school days when children are present, including "Minimum Days" and field trips.		<ul style="list-style-type: none"> <li>EC Section 49550:</li> <li>"Notwithstanding any other provision of law, each school district and county superintendent of schools maintaining any kindergarten or any of grades 1 to 12 shall, commencing on July 1, 1977, provide for each needy pupil enrolled therein, one nutritionally adequate free or reduced-price meal during each school day..."</li> </ul>
<b>PROGRAM AREA 7</b> USDA DONATED FOODS	A. USDA donated or purchased food inventory records. B. Records of ordering, receiving, processing, and contracts. C. Local health department inspection reports or a letter indicating alternative system in place. D. Current Storage Facility Review form. Refer to ATTACHMENT I.		<ul style="list-style-type: none"> <li>STORAGE: Facilities for the handling, storage, distribution and preparation of purchased and donated foods shall be such as to properly safeguard against theft, spoilage and other loss.</li> <li>RECORD KEEPING: Accurate and complete records must be maintained for the receipt, use, disposal and inventory of donated foods, including processed donated foods.</li> </ul> Reference: 7 CFR 250.48
<b>PROGRAM AREA 8</b> SCHOOL BREAKFAST PROGRAM  For sponsors with the NSLP and the SBP Agreements, a review of the breakfast program is incorporated into the CRE review and required in a follow-up review.	A. Daily meal counts by category of Free, Reduced Price, and Paid B. Daily Menu Production Records and Meal Pattern or Nutrient Standard followed. C. Free and reduced price applications by category or roster that ties to NSLP applications. D. SEVERE NEED BREAKFAST PROGRAM – Monthly summary meal counts for the second preceding year to substantiate the number reported on the CNIPS Site Application(s) and verify eligibility to participate. Refer to ATTACHMENT J, Severe Need Breakfast Program Verification Form		<ul style="list-style-type: none"> <li>The same type of records should be kept for the School Breakfast Program as are required under the CRE regulations for the National School Lunch Program, including but not limited to A, B, C and D at left.</li> </ul> References: 7 CFR 220.7 and 220.8
<b>PROGRAM AREA 9</b> AFTER SCHOOL SNACK PROGRAM  Meal Supplement (After School Snack) Programs are reviewed under the same provisions as the School Breakfast Program. If not reviewed during the initial CRE they must be reviewed at the sites selected during a follow-up review.	A. Documentation of site "area eligibility" or documentation from the school of students' free or reduced price eligibility. B. Attendance records to support meal counts at all sites. C. Daily meal count records at "area eligible" sites. "Point of service" meal counts by eligibility (free, reduced price, and paid) at pricing or non-pricing sites. D. Menu Production Records for the After School Snack Program which indicate food and quantity served to meet requirements of a minimum of two food elements in the appropriate quantity. E. Documentation of the structured and supervised care in an after school setting. Description of the education/enrichment activity. F. Records of snack program site monitoring, conducted at least 2 times per program year, with intervals no greater than 6 months. Refer to ATTACHMENT K		<ul style="list-style-type: none"> <li>"AREA ELIGIBLE SITE" - Documentation that 50% or more of students enrolled are approved for free or reduced price meals. Allows eligible site to be reimbursed at the free rate.</li> <li>The site may operate as "NON-PRICING" meaning no separate charge for children's snacks, but meals are counted in the eligibility category by child (free, reduced price, paid) and claimed in the appropriate category.</li> <li>The site may operate as "PRICING" where each child pays a snack charge and the meals are counted in the appropriate eligibility category (free, reduced price, and paid) and claimed in the appropriate category.</li> </ul> References: 7 CFR 226.16(d)(4)(iii), MB 99-111 and 00-100, and USDA FNS website <a href="http://www.fns.usda.gov/cnd/Care/Reqs-Policy/Snacks/Snacks_QAs.htm">http://www.fns.usda.gov/cnd/Care/Reqs-Policy/Snacks/Snacks_QAs.htm</a>

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<p><b>PROGRAM AREA 10</b> SEAMLESS SUMMER FEEDING OPTION (SSFO)</p> <p>A review of the SSFO is incorporated into the CRE review. One SSFO site must be reviewed the summer before or the summer after the CRE. (If more than one site is reviewed during the school year in your district, the Seamless Summer Feeding Option site will be the one site reviewed during the summer.)</p>	<p>A. Copy of the Seamless Summer Feeding Option (SSFO) Agreement.</p> <p>B. The Agency/Site Food Service Agreement for sites not under the direct supervision of the agency.</p> <p>C. Eligibility documents for Camps and Closed Enrolled - Not Area Eligible sites:  <ul style="list-style-type: none"> <li>• The total number of children enrolled and eligible</li> <li>• Applications and rosters for the SSFO sites selected for review. <ul style="list-style-type: none"> <li>○ Roster(s) showing student's name; eligibility category; date enrolled; withdrawal date; and official signature, if applicable.</li> <li>○ Certified eligibility forms or other approved alternative documentation verifying children's eligibility.</li> <li>○ Income eligibility scale for the current</li> </ul> </li> </ul> </p> <p>D. Daily listed menus and menu production records for the day and month of review listing all required food items and components or menu items, serving sizes and quantity used in food preparation.</p> <p>E. Transport records, including time and temperature of potentially hazardous foods, for day and month of review.</p> <p>F. Daily meal count records and monthly meal count totals <u>reported separately</u> by site for the months of the SSFO.</p> <p>G. Daily meal counts for five days prior to the day of review (for site selected for review).</p> <p>H. Site monitoring of the SSFO within three weeks of the start of operation including documentation of site visit and corrective action. Refer to ATTACHMENT L.</p> <p>I. Copies of advertising materials promoting summer meals.</p> <p>J. Completed Reimbursement Claim. Provide documentation that the SSFO meals were claimed separate from the NSLP and the SBP claims during the school year.</p>		<ul style="list-style-type: none"> <li>• Ensure that for all sites and meal types the menu planning option is correct in the CNIPS.</li> <li>• For Area eligible sites, copies of the documentation submitted to the State Agency to document that: <ul style="list-style-type: none"> <li>○ Open sites: Sites are located in areas whose nearby school data for free and reduced price are at least 50%.</li> <li>○ Restricted open sites: Sites meet the open site criteria, explained above, but restrict the number of children that may attend for safety, control or security reasons.</li> <li>○ Migrant sites: Sites serve a majority of children of migrant families according to migrant organization.</li> <li>○ Closed Enrolled - Area Eligible sites: Sites meet the open site criteria but are only open to enrolled children or an identified group of children.</li> </ul> </li> <li>• Applications and rosters: Each roster listing all eligible students should be in the same order as the eligibility applications organized by site and session, if applicable.</li> </ul> <p>References: 7 CFR 210, 7 CFR 220, 7 CFR 225 and <i>Summer Food Service Program for Children, Administrative Guidance for Sponsors.</i></p>

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<p><b>PROGRAM AREA 11</b> COMPETITIVE FOODS/ FMNV/ FOOD AND BEVERAGE SALES</p>	<p>A. Foods of Minimal Nutritional Value (FMNV)</p> <ol style="list-style-type: none"> <li>Procedure in place that FMNV foods and beverages are not sold during the reimbursable meal period in areas where reimbursable meals are served and/or eaten</li> </ol> <p>B. Food Service ❖</p> <ol style="list-style-type: none"> <li>List of all foods and beverages sold a-la-carte by food service on campus from ½ hour before to ½ hour after the end of the school day for each site selected for review</li> <li>Procedure in place to evaluate foods and beverages according to nutrition standards sold a-la-carte by food service</li> </ol> <p>C. Student Organizations ❖</p> <ol style="list-style-type: none"> <li>List of all student organizations that sell foods and beverages to pupils outside of the meal program</li> <li>List of food and beverage items sold to pupils for each site selected for CRE review</li> <li>Procedure in place to evaluate foods and beverages according to nutrition standards sold by student organizations</li> </ol> <p>D. Other Groups/Individuals ❖</p> <ol style="list-style-type: none"> <li>List of all foods and beverages sold to pupils outside of the meal program that are sold by Parent Teacher Association (PTA), Parent Teacher Organization (PTO), Regional Occupational Program (ROP), Regional Occupational Center (ROC), or any other groups/individual not mentioned above</li> <li>Procedure in place to evaluate foods and beverages according to nutrition standards sold by PTO/PTA, ROP/RPC, or any other groups/individuals not mentioned above</li> </ol> <p>E. Trans Fat</p> <ol style="list-style-type: none"> <li>Procedure in place whereby foods sold or served to pupils outside of the meal program contain &lt; 0.5 grams artificial trans fat</li> </ol>		<ul style="list-style-type: none"> <li>Applies to all entities selling foods and beverages on campus during the reimbursable meal period.</li> <li>Note: If food or beverage item is found on the FMNV List of Exemptions, then this rule no longer applies.</li> </ul> <p>Reference: USDA APB: SP-01-04, 7 CFR Parts 210.11, Appendix B</p> <ul style="list-style-type: none"> <li>CDE suggests that food service, or designee, be assigned responsibility for collecting this information.</li> <li>Must be able to demonstrate this procedure for each site selected for CRE review.</li> </ul> <p>Authority provided under EC 49431(c), 49431.2(d), 49431.5(d), and 49434</p> <ul style="list-style-type: none"> <li>CDE suggests that The Associated Student Body (ASB) or each individual student organization be assigned responsibility for collecting this information.</li> <li>Must be able to demonstrate this procedure for each site selected for CRE review.</li> </ul> <p>Authority provided under California Code of Regulations, Title 5, sections 15500, and 15501 and EC 48931 and 49434</p> <ul style="list-style-type: none"> <li>CDE suggests that a representative from PTA/PTO, ROP/ROC, or other groups/individuals, respectively, be assigned responsibility for collecting this information.</li> <li>Must be able to demonstrate this procedure for each site selected for CRE review.</li> </ul> <p>Authority provided under EC 48931, 49431(c), 49431.2(d), and 49431.5(d).</p> <ul style="list-style-type: none"> <li>Must be able to demonstrate this procedure for each site selected for CRE review.</li> <li>Trans fat restrictions for food in the reimbursable meal became effective July 1, 2008 (EC 49430.7).</li> <li>Trans fat restrictions for food outside of the reimbursable meal becomes effective July 1, 2009 (EC 49431.7)</li> </ul> <p>Reference: EC 49430.7 and 49431.7</p>

❖ The reviewer will not evaluate whether beverages and foods sold on campuses meet requirements. However, additional information about those foods and beverages may be requested for randomly selected sites.

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<p><b>PROGRAM AREA 12</b> WELLNESS POLICY</p>	<p>A. Wellness Policy that includes all 5 topic areas:</p> <ol style="list-style-type: none"> <li>1. Involvement of parents, students, school food service representatives, school board, school administrators and community in the development of the school wellness policy.</li> <li>2. Goals for nutrition education, physical activity, and other school-based activities designed to promote student wellness.</li> <li>3. Nutrition guidelines for all food available on each school campus during the school day.</li> <li>4. Assurance that guidelines for reimbursable meals will not be less restrictive than federal regulations and guidance issued by the USDA.</li> <li>5. A plan for measuring the implementation of the local wellness policy and designation of one or more persons in the district or at each school to oversee the implementation of the adopted wellness policy.</li> </ol> <p>B. The wellness policy posted in public view within all school cafeterias or other central eating areas.</p>		<p>References:</p> <ul style="list-style-type: none"> <li>• California School Boards Association, <a href="http://www.csbba.org/AboutCSBA/CSBAFoundation/StudentWellness.aspx">http://www.csbba.org/AboutCSBA/CSBAFoundation/StudentWellness.aspx</a></li> <li>• Letter to the County and District Superintendents and the School Food Service Directors dated December 14, 2005, guidance for the Development of California School Wellness Policies <a href="http://www.californiahealthkids.org">http://www.californiahealthkids.org</a></li> <li>• School Nutrition Association (formerly ASFS) <a href="http://www.schoolnutrition.org/">http://www.schoolnutrition.org/</a></li> <li>• USDA Team Nutrition web site, <a href="http://www.teamnutrition.usda.gov">http://www.teamnutrition.usda.gov</a></li> </ul>
<p><b>PROGRAM AREA 13</b> FINANCIAL MANAGEMENT</p>	<p>A. Prior June reimbursement claim which includes revenue and expenses.</p> <p>B. Independent school district auditor report from prior year that shows net cash resources.</p> <p>C. Budget</p> <ol style="list-style-type: none"> <li>1. Unaudited Actuals (Cafeteria Special Revenue Fund Expenditures By Object Report for Fund 13) to include the prior year budget for unaudited expenses and revenues.</li> <li>2. Proposed current year budget.</li> </ol> <p>D. Prior month financial activity report for Fund 13 to show all expenses paid from the cafeteria fund.</p> <p>E. Payroll labor distribution for prior month for Fund 13, including names and percentage paid from the cafeteria account.</p>		<ul style="list-style-type: none"> <li>• Bid threshold:\$76,700, effective January 1, 2009</li> </ul> <p>References: <i>MB 95-107</i> (Use of Cafeteria Funds), <i>00-109</i> (Use of Cafeteria Funds Update), <i>MB NSD SNP 07-2008</i> (Limitations on Fund Transfers), <i>MB NSD SNP 05-2009</i> (Cafeteria Funds FAQs), and Procurement bid threshold website <a href="http://www.cde.ca.gov/fg/ac/col">http://www.cde.ca.gov/fg/ac/col</a></p>

**NSLP  
SCHOOL MEALS INITIATIVE (SMI) REVIEW GUIDANCE**

*NOTE: Only areas related to SMI are included in this guidance (all other areas of review can be found in the NSLP CRE Administrative Review Guidance)*

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<b>SITE SELECTION</b>			<p>Ensure the menu planning options for each site and each meal type are correctly stated in the CNIPS. If the CRE is conducted at the same time, the SMI site(s) may be selected as one of the CRE site(s).</p> <p>One site for each type of menu planning used by the district will be selected.</p> <p>Site selection criteria includes:</p> <ul style="list-style-type: none"> <li>• Food Service Director request</li> <li>• Satellite or production kitchens</li> <li>• Sites that have new staff; complex serving lines; multiple menu choices; grade mix; made healthy meal changes; different cycle menus; not been previously reviewed.</li> </ul>
<b>ON-SITE VISIT</b>	<ol style="list-style-type: none"> <li>1. Menu for the day with portion size per age/grade group.</li> <li>2. Menu production records/nutrient analysis for the day.</li> <li>3. Standardized recipes and processed product information for items served those day.</li> </ol>		<p>Reviewer(s) will require the listed items to be provided by the food service director or site staff.</p> <p>The on-site visit will include observations of meal preparation and service.</p>
<b>NUTRITION EDUCATION</b>	<ol style="list-style-type: none"> <li>1. Samples of any nutrition education to promote healthy lifestyles for children, school staff or parents.</li> <li>2. Training for food services staff on SMI or related topics.</li> <li>3. Team Nutrition activities or materials.</li> <li>4. SHAPE California activities or materials.</li> <li>5. Garden Project activities or materials.</li> <li>6. Displays of the Food Guide Pyramid and the Dietary Guidelines.</li> <li>7. Menu slicks with nutrition education/physical exercise promotions.</li> <li>8. Outreach including school boards, community, farmer, and parent organizations.</li> </ol>		<p>Nutrition Education also may include nutrition topics integrated into the curriculum, nutrition disclosure on menus or in newsletters, and local nutrition policy.</p>
<p>Legend of Acronyms:</p> <p>7 CFR = Title 7 Code of Federal Regulations            CRE = Coordinated Review Effort            EC = California Education Code            FNS = Food and Nutrition Service            MB = Management Bulletin            NSD = Nutrition Services Division            NSLP = National School Lunch Program            SHAPE = Shaping Health as Partners in Education            USDA = United States Departments of Agriculture</p>		<p><b>REFERENCES</b></p> <ol style="list-style-type: none"> <li>1. <i>Healthy School Meals Training Manual</i></li> <li>2. 7 CFR Part 210.10 and 220.8 Menu Planning Approaches</li> <li>3. <i>Management Bulletins:</i> <ul style="list-style-type: none"> <li>• 96-113 Nutritional Analysis of USDA Quantity Recipes</li> <li>• 97-107 Grain/Bread Requirements</li> <li>• 00-113 Summary of Final Rule – Menu Planning Approaches</li> </ul> </li> <li>4. USDA FNS SMI Frequently Asked Questions, April 2007</li> <li>5. <i>School Nutrition Programs Administrative Manual</i></li> </ol>	

(1) AREA TO BE REVIEWED	(2) THE AGENCY SHOULD HAVE THESE DOCUMENTS AVAILABLE	(3) AGENCY (N) CHECKLIST	(4) ADDITIONAL INFORMATION
<p><b>NUTRIENT STANDARD MENU PLANNING APPROACHES:</b></p> <p><b>NUTRIENT STANDARD MENU PLANNING (NSMP)</b></p> <p><b>SHAPE NUTRIENT STANDARD MENU PLANNING (SNSMP)</b></p> <p>Menu and information will be needed for both breakfast and lunch</p>	<ol style="list-style-type: none"> <li>MENUS for the Review Period and day of review listing type of menu item and portion size for each grade group.</li> <li><b>STANDARDIZED RECIPES</b> (for each site) for items that contain more than one ingredient. See sample standardized recipe form, Attachment A. Standardized recipe must include:               <ol style="list-style-type: none"> <li>Name of recipe</li> <li>Yield (include serving size and number of servings)</li> <li>Documentation of type of menu item i.e. entrée or side dish</li> <li>All ingredients and type, such as fresh, frozen, and light syrup</li> <li>Correct measures, weights and/or pack size.</li> <li>Preparation instructions</li> <li>Nutrient analysis of the recipe</li> </ol> </li> <li><b>LIST OF PROCESSED FOODS</b> (See sample vendor product list worksheet Attachment B)               <ol style="list-style-type: none"> <li>Reference by manufacturer, product name, and code number from the locked USDA Database</li> <li>Nutrition information label documenting nutrient levels for Calories, Protein, Vitamin A and C, Iron, Calcium, % of Calories from Fat and Saturated Fat.</li> </ol> </li> <li><b>MENU PRODUCTION and/or TRANSPORT RECORDS</b> for all sites that include:               <ol style="list-style-type: none"> <li>Number of meals planned and number served, by grade group.</li> <li>All planned menu items used to meet the daily and weekly requirements, including condiments.</li> <li>Serving size by grade group for each food item.</li> <li>Total amount of food prepared for the number of students by grade group.</li> <li>Actual number of students and adults served.</li> <li>A la carte and adult meals planned and served.</li> <li>Leftover usage records, substitution lists and dates.</li> </ol> </li> <li><b>AVERAGE WEEKLY AND DAILY NUTRITIONAL ANALYSES</b> for each week meals are served by grade or age group including information for meeting all required nutrition standards, i.e., calories, protein, vitamins A and C, iron, calcium, total fat, and saturated fat.</li> <li><b>PRINTOUT OF AGE/GRADE STANDARDS</b> used including any custom standards.</li> </ol>		<ul style="list-style-type: none"> <li>The Reviewer will select the month and week of review. If conducted during a CRE, the review month may be different for the SMI review.</li> <li>Records must include type and quantity of food used, number persons served, and portion size for the month of review.</li> <li>Any substitutions of menu items must follow the "two week window" and be clearly documented.</li> <li>Insure that all planned menu items are served in the portions which correspond to the menu items analyzed</li> <li>Insure that the nutrient information for all products is current.</li> <li>Nutritional analyses for each week must be available for review. They may be stored as computer files or as paper printouts</li> <li>Provide documentation of the type and most current version of USDA approved nutrient analysis software being used.</li> <li>Cholesterol, fiber, and sodium levels will also be evaluated.</li> </ul> <p>Reference: For the most current list of approved software go to the USDA Healthy Meals Resource System Team Nutrition website: <a href="http://healthymeals.nal.usda.gov/nal_display/index.php?info_c=enter=14&amp;tax_level=1&amp;tax_subject=234">http://healthymeals.nal.usda.gov/nal_display/index.php?info_c=enter=14&amp;tax_level=1&amp;tax_subject=234</a></p>
<p><b>ASSISTED NUTRIENT STANDARD MENU PLANNING (ANSMP)</b></p>	<ol style="list-style-type: none"> <li>Initial cycle menu and backup documents submitted to NSD.</li> <li>Approval letter of the initial cycle menu by the NSD.</li> <li>Name, address, contract, and qualifications of the consultant.</li> <li>All items required for NSMP must be available for review at the school/agency (see previous section for NSMP).</li> </ol>		<p>Reference: MB 96-111 Assisted Nutrient Standard Menu Planning</p>

(1) AREA TO BE REVIEWED	(2) THE AGENCY SHOULD HAVE THESE DOCUMENTS AVAILABLE	(3) AGENCY (✓) CHECKLIST	(4) ADDITIONAL INFORMATION
<p>FOOD BASED MENU PLANNING (FBMP) APPROACHES:</p> <p>ENHANCED (EFBMP)</p> <p>TRADITIONAL (TFBMP)</p> <p>SHAPE FBMP</p> <p>Menus and information will be needed for both breakfast and lunch</p>	<p>1. MENUS for the Review Period and day of review listing components/portion size for each grade group.</p> <p>2. STANDARDIZED RECIPES (for each site) for items that contain more than one ingredient. See sample standardized recipe form, Attachment A. Standardized recipe must include: :</p> <p>a) Name of recipe b) Yield (include serving size and number of servings) c) All ingredients - the form (fresh, frozen, light syrup. Etc.) d) Correct measures, weights e) Preparation instructions f) Contribution to the meal pattern</p> <p>7. LIST OF PROCESSED FOODS (See sample vendor product list worksheet, Attachment B)</p> <p>a) Manufacturer's specifications or Child Nutrition Label (CN label) b) Nutrition information label documenting nutrient levels for Calories, Protein, Vitamins A and C, Iron, Calcium, % of Calories from Fat and Saturated Fat.</p> <p>3. MENU PRODUCTION and/or TRANSPORT RECORDS for all sites that include:</p> <p>a) Number of meals planned and number served, by grade group b) All planned menu items used to meet the required meal pattern, condiments, and non-creditable desserts c) Serving size by grade group for each food item d) Total amount of food prepared for the number of students by grade group e) Actual number of students and adults served f) A la carte and adult meals planned and served g) Leftover usage records, substitution lists and dates</p> <p>4. Copy of nutrient analysis for the review period and day of review, if one has been conducted by the district. Analysis of menus is not required for districts using FBMP approaches.</p>		<p>The reviewer will select the month and week of review. If conducted during a CRE, the review month may be different for the SMI review.</p> <ul style="list-style-type: none"> <li>The state agency will complete a nutritional analysis and give assistance to improve the quality of the meals.</li> <li>Documents listed in column (2) are required to complete a week of menu analysis.</li> <li>Documents may be requested in advance of the review date so that the nutrient analysis may be conducted prior to the review.</li> <li>Document of which USDA approved software was used, if applicable.</li> </ul> <p>NOTE: Districts are encouraged to complete the nutritional analysis of recipes and menus.</p> <p>Reference: For the most current list of approved software go to the USDA Healthy Meals Resource System Team Nutrition website: <a href="http://healthymeals.nal.usda.gov/nal_display/index.php?info_c=enter=14&amp;tax_level=1&amp;tax_subject=234">http://healthymeals.nal.usda.gov/nal_display/index.php?info_c=enter=14&amp;tax_level=1&amp;tax_subject=234</a></p>

**ATTACHMENT A**

**STANDARDIZED RECIPE FORM**

RECIPE NUMBER: \_\_\_\_\_ RECIPE TITLE: \_\_\_\_\_ YIELD: \_\_\_\_\_ (# OF PANS/GALLONS/LOAVES, ETC.)  
 PORTION SIZE: \_\_\_\_\_ PORTIONS PER RECIPE: \_\_\_\_\_ TEMPERATURE: \_\_\_\_\_ STANDARD OVEN: \_\_\_\_\_  
 EQUIPMENT NEEDED: \_\_\_\_\_ TEMPERATURE: \_\_\_\_\_ CONVECTION OVEN: \_\_\_\_\_  
 \_\_\_\_\_ TEMPERATURE: \_\_\_\_\_ RANGE TOP/BURNER: \_\_\_\_\_

INGREDIENTS	100 SERVINGS		FOR _____ SERVINGS		DIRECTIONS
	WEIGHT	MEASURE	WEIGHT	MEASURE	

**NUTRITIONAL ANALYSIS**

CALORIES	PROTEIN	CARBO-HYDRATE	FIBER	FAT	SATURATED FAT	TRANS FAT	CHOLESTEROL	SODIUM	IRON	CALCIUM	VITAMIN A	VITAMIN C

**CONTRIBUTION TO MEAL PATTERN:**

MEAT /MEAT ALTERNATE \_\_\_\_\_ M/M/A  
 VEGETABLE/FRUIT \_\_\_\_\_ CUPS  
 GRAIN/ BREAD \_\_\_\_\_ G/B



