



CSIS California School Information Services

Jefferson Union High School District

Food Service Review

May 31, 2017



Joel D. Montero
Chief Executive Officer







CSIS California School Information Services

May 31, 2017

Dan Burns, Superintendent
Jefferson Union High School District
699 Serramonte Boulevard, Suite 100
Daly City, CA 94015-4132

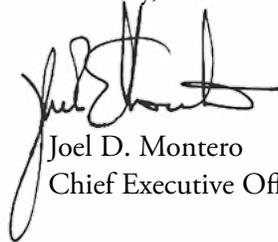
Dear Superintendent Burns,

In November 2016, the Jefferson Union High School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for a food service review. Specifically, the agreement stated that FCMAT would perform the following:

1. Examine the food service department's operational process and procedures in areas including but not limited to food preparation, meal service, student participation, staffing, federal and state compliance, menu planning, purchasing, warehousing and food storage, inventory, and facilities, and make recommendations for improved efficiency, if any.
2. Evaluate the department's workflow and distribution of functions and make recommendations for improved efficiency, if any.
3. Review training and professional development programs for the department's employees and managers and make recommendations for improvements, if any.

This final report contains the study team's findings and recommendations in the above areas of review. FCMAT appreciates the opportunity to serve the Jefferson Union High School District and extends thanks to all the staff for their assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

1300 17th Street - CITY CENTRE, Bakersfield, CA 93301-4533 • Telephone 661-636-4611 • Fax 661-636-4647
755 Baywood Drive, 2nd Floor, Petaluma, CA 94954 • Telephone: 707-775-2850 • Fax: 661-636-4647 • www.fcmat.org
Administrative Agent: Mary C. Barlow - Office of Kern County Superintendent of Schools



Table of Contents

About FCMAT	iii
Introduction	1
Executive Summary	3
Findings and Recommendations.....	7
Staffing Overview	7
Budget	7
Staffing and Meals per Labor Hour	9
Meal Program	14
Training and Leadership	19
Wellness Policy	21
Food Safety Program	22
Competitive Food Sales	24
Personnel Activity Reports	26
Facilities	28
Marketing	29
Purchasing	32
Cash Handling	34
Meal Counting and Collection Procedures.....	35
Appendices	37

About FCMAT

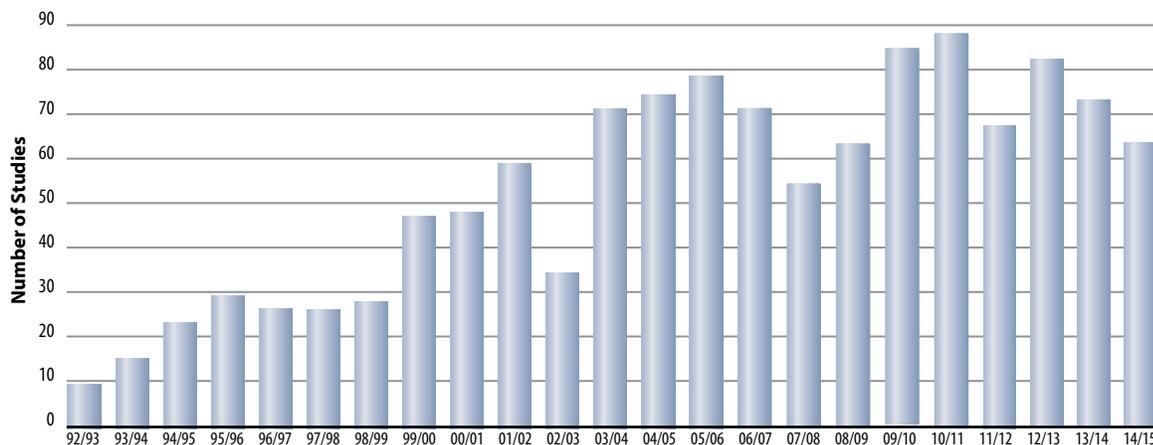
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related school business and data services. FCMAT's fiscal and management assistance services are used not just to help avert fiscal crisis, but to promote sound financial practices, support the training and development of chief business officials and help to create efficient organizational operations. FCMAT's data management services are used to help local educational agencies (LEAs) meet state reporting responsibilities, improve data quality, and inform instructional program decisions.

FCMAT may be requested to provide fiscal crisis or management assistance by a school district, charter school, community college, county office of education, the state Superintendent of Public Instruction, or the Legislature.

When a request or assignment is received, FCMAT assembles a study team that works closely with the LEA to define the scope of work, conduct on-site fieldwork and provide a written report with findings and recommendations to help resolve issues, overcome challenges and plan for the future.

FCMAT has continued to make adjustments in the types of support provided based on the changing dynamics of K-14 LEAs and the implementation of major educational reforms.

Studies by Fiscal Year



FCMAT also develops and provides numerous publications, software tools, workshops and professional development opportunities to help LEAs operate more effectively and fulfill their fiscal oversight and data management responsibilities. The California School Information Services (CSIS) division of FCMAT assists the California Department of Education with the implementation of the California Longitudinal Pupil Achievement Data System (CALPADS). CSIS also hosts and maintains the Ed-Data website (www.ed-data.org) and provides technical expertise to the Ed-Data partnership: the California Department of Education, EdSource and FCMAT.

FCMAT was created by Assembly Bill (AB) 1200 in 1992 to assist LEAs to meet and sustain their financial obligations. AB 107 in 1997 charged FCMAT with responsibility for CSIS and its state-wide data management work. AB 1115 in 1999 codified CSIS' mission.

AB 1200 is also a statewide plan for county offices of education and school districts to work together locally to improve fiscal procedures and accountability standards. AB 2756 (2004) provides specific responsibilities to FCMAT with regard to districts that have received emergency state loans.

In January 2006, Senate Bill 430 (charter schools) and AB 1366 (community colleges) became law and expanded FCMAT's services to those types of LEAs.

Since 1992, FCMAT has been engaged to perform more than 1,000 reviews for LEAs, including school districts, county offices of education, charter schools and community colleges. The Kern County Superintendent of Schools is the administrative agent for FCMAT. The team is led by Joel D. Montero, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

The Jefferson Union High School District is in San Mateo County and serves the cities of Daly City, Brisbane and Pacifica, as well as the town of Colma. Its students come from the Jefferson Elementary, Brisbane, Bayshore, and Pacifica school districts.

The district has the following four comprehensive high schools and continuation high school:

- Jefferson High School
- Oceana High School
- Terra Nova High School
- Thornton High School, a public continuation high school
- Westmoor High School

The district operates a food services program that includes breakfast and lunch for students at all schools. Jefferson and Westmoor high schools also have an after-school snack program, which is provided by Children's Empowerment Inc. The district is a closed campus and students cannot leave at lunch to eat elsewhere, though students do bring their lunches and parents often drop-off meals for their children.

According to DataQuest (data1.cde.ca.gov/dataquest), the district's enrollment has decreased in most years since 2004-05. Enrollment for 2015-16 was 4,601, with 39% of students eligible for free or reduced price meals. According to the California Longitudinal Pupil Achievement Data System (CALPADS) certification for the 2016-17 fiscal year, the district's enrollment was 4,437, a decline of 164 students over the previous year. The unduplicated count of students who are eligible for free or reduced-price meals for 2016-17 is 1,607 or 36%, which is a 3% decrease from the prior year.

Study Team

The study team was composed of the following members:

Scott Sexsmith
FCMAT Intervention Specialist
Bakersfield, CA

Rodney S. Blackner
FCMAT Consultant
Paso Robles, CA

John Lotze
FCMAT Technical Writer
Bakersfield, CA

Judy Stephens
FCMAT Consultant
Nipomo, CA

Each team member reviewed the draft report to confirm its accuracy and to achieve consensus on the final recommendations.

Study Guidelines

In November 2016 the Jefferson Union High School District requested that FCMAT review its Food Services Department. FCMAT visited the district on January 11-13, 2017 to conduct interviews, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Staffing Overview
- Budget
- Staffing and Meals per Labor Hour
- Meal Program
- Training and Leadership
- Wellness Policy
- Food Safety Program
- Competitive Food Sales
- Personnel Activity Reports
- Facilities
- Marketing
- Purchasing
- Cash Handling
- Meal Counting and Collection Procedures
- Appendices

In writing its reports, FCMAT uses the Associated Press Stylebook, a comprehensive guide to usage and accepted style that emphasizes conciseness and clarity. In addition, this guide emphasizes plain language, discourages the use of jargon and capitalizes relatively few terms.

Executive Summary

Staffing Overview

The food service program is led by a director located at the district office. All schools except Thornton High have a full-time food services manager. Kitchen staffing consists of a variety of paid positions, including student helpers and employees. All site-level employees except the manager work less than four hours per day.

Budget

The district's budget projections and its prior years' food service budgets indicate the Food Services Department has been deficit spending and requires increasingly large contributions from the district's general fund. Labor costs are high, projected at 72% of revenue for the current fiscal year. Indirect costs are not being charged to the food service fund, which means the expenses and the deficit are likely understated.

Food and labor are the largest costs in any food service program. Ideally, each of these expenses alone should equal to 40-45% of program revenue. However, the department's expenses for food have consistently been 50-51% of revenue. Its labor costs have been 65-68% of revenue in the prior two years and, as mentioned above, are projected to be 72% in 2016-17. These levels are unsustainable and indicate overstaffing. The district needs to eliminate deficit spending in the cafeteria fund by developing and implementing a plan to reduce expenditures and/or increase revenues.

Breakfast counts were approximately 26% less and lunch counts approximately 39% less in October 2016 than in October 2014. District administrators need to review the trends and find ways to increase student participation, or make staffing adjustments in response to reduced meal counts and revenue.

Staffing and Meals per Labor Hour

Another method of measuring food service staffing is meals per labor hour (MPLH). It is best practice to maintain an MPLH of approximately 30; the district's average MPLH was 18. The highest MPLH was at Westmoor High School, which had 24. The lowest among the comprehensive high schools was Terra Nova High School at 13 MPLH. These numbers indicate overstaffing.

Combined with the district's high labor costs, these MPLH findings are significant, and addressing this issue will be critical to the program's solvency and success. The department either needs to significantly increase participation or significantly reduce staff.

Meals

The district has districtwide weekly menus, with four entrées offered each day along with the required side dishes. Some managers commented that certain foods offered are not appealing to certain student groups, while other managers have shown interest in creating their own entrées. Neither managers nor students are surveyed to determine whether they have legitimate ideas in improving menu offerings.

Some items served during FCMAT's fieldwork were burnt or served cold when they should have been hot. Food quality needs to be monitored. Many wrapped food items did not include adequate information about their contents, which reduces their appeal to students. Better packaging and more attractive displays of food would make the food more appealing.

It is not clear whether the menus meet nutritional requirements. The district's sample analysis of menus from the week of Jan 9-13, 2017 indicated that the items offered did not meet calorie requirements. The district's analysis showed that the calories exceeded the targets significantly: breakfast was 999 calories (67%-122% more than the recommendation of 450-600), and lunch was 2,517 (196%-236% more than the recommendation of 750-850). Sodium was also far higher than allowed. The district should pay closer attention to menu analysis to ensure it is done correctly and the requirements are being met.

Many meal service lines were long and slow-moving. Staff placed all items on trays for students, even though many are wrapped and could be self-serve. With slight modifications, the serving counters could be used as self-serve lines, which would be faster and require fewer staff.

Training and Leadership

The food services director and site managers do not meet regularly. There are many items to discuss and collaborate on including program requirements, food safety, line efficiency, menus, student preferences, and staff issues. The director and managers should meet monthly or every other month.

Many of the three-hour-per-day employees are new to the district and to food service and need training. Providing short training sessions regularly throughout the year covering all aspects of the program would benefit these employees. Student helpers also need basic training on program requirements and food safety. The district should provide annual training and retraining as needed for students.

Wellness Policy

The district has a wellness policy that meets requirements of the National School Lunch Program; however, it has not had a wellness committee or a board report in approximately four years and is thus out of compliance with federal regulations regarding this. The district should develop a wellness committee and begin holding meetings regularly, monitor progress, and report annually to the board.

Food Safety Program

The Child Nutrition and WIC [Women, Infants and Children] Reauthorization Act of 2004 requires school administrators to implement a food safety program based on hazard analysis and critical control points (HACCP). The district's food services department does not have a complete food safety program. The department needs to develop a written HACCP plan that meets federal requirements.

Staff need to understand the importance of food safety and workplace safety. Employees indicated that the district lacks any written documents regarding staff awareness and understanding of food safety. The district should develop a written statement for employees to sign each year; these can also be part of employee evaluations.

Competitive Food Sales

The Healthy Hunger-Free Kids Act of 2010 specifies that nutrition standards apply to all foods sold on campus any time during the school day. The district's schools host a food day four times a year during which various clubs prepare and sell food at school. This food may not meet the nutritional requirements for competitive food sales. Many of the food items are cooked on campus, which is also a violation of the regulations. School and district administrators need to review the food sale regulations and determine whether the items served and manner of prepara-

tion can be modified to achieve compliance, or whether they may need to cease offering some or all food day items.

Marketing

The district's website has little information about food services, does not market the quality of the program, and does not list food services as a district department. The website should provide information regarding changes in regulations and meal offerings, nutritional information about the schools' menus, and examples of ways teachers and parents can help implement the dietary guidelines.

All schools lacked signage clearly identifying the cafeteria. Many of the eating areas FCMAT visited had no signage other than white boards with some of the day's offerings. The district should assess and improve signage.

Purchasing

The Food Services Department does not conduct any formal quote or bidding process for food and supplies. To try to get lower pricing, the district could consider requests for bids from all vendors willing to serve the district, or join with other districts to form a buying cooperative. Either of these options could save the district a significant amount of money.

Findings and Recommendations

Staffing Overview

The food service program is led by a director located at the district office. Every school except Thornton High has a full-time food services manager. Kitchen staffing is made up of a variety of paid positions, including students and employees. All site-level employees except the manager work less than four hours per day.

Budget

Ideally, a district's food service program should be self-sustaining: revenue should fund department expenses, including indirect costs, with appropriate reserves maintained. The district's cafeteria budget from 2014-15 through 2016-17 shows that expenses exceed revenues each year. Appendix A includes a table that compares these budgets.

The district is not charging indirect costs to the cafeteria fund, and as a result the program's expenses and deficit are both understated. Indirect costs consist of business and administrative expenses for services provided to all programs; these include budget, payroll, accounts payable, human resources, and data processing. The California School Accounting Manual (CSAM) provides guidelines for allowable indirect cost amounts and how to calculate them. Even in a deficit spending situation, the district should charge indirect costs to the cafeteria fund because they are legitimate responsibilities of the program and will show its true cost.

The cafeteria fund has had insufficient reserves to absorb the ongoing deficits, so the district has had to contribute money to the program from its general fund. The general fund contribution was \$50,000 in 2014-15; \$150,000 in 2015-16, and is projected to be \$250,000 for 2016-17. This is a 400% increase in contributions in two years.

Food and labor are the two major costs in a food service program. Ideally, costs for each of these two items should be equal to 40-45% of program revenue. However, the district's Food Services Department's expenses in these areas have been significantly higher in the prior two years, at 50-51% of revenue for food and 65-68% of revenue for labor which is projected at 72% in 2016-17. These levels of costs are unsustainable. The high food costs would not be alarming if labor costs were at or near the recommended percentages; however, the district's labor costs are extremely high and indicate significant overstaffing.

Food service revenue in 2015-16 was approximately 8% higher than in 2014-15 but is projected to decrease by approximately 6% for the current year. The food service staff stated that student participation in the program has been declining, and a review of the number of meals served in the current year compared to the two prior years confirms this. Breakfast counts decreased by approximately 26% and lunch counts decreased by approximately 39% from October 2014 to October 2016. School districts throughout the country have experienced declining participation over the past five years since the implementation of stricter nutritional regulations. Regardless of the reasons for the decline, the district's administrators need to review the trends and find ways to increase student participation, or reduce staffing to reflect the reduced meal counts and revenue. Without these changes, the food service program cannot maintain financial stability and will continue to depend on general fund contributions.

The food services director reported that he has never been involved in the program's budget process or been held accountable for his department's budget, and that he and department employees were unaware that the cafeteria fund was deficit spending requiring a district contribution. This needs to change immediately, and the Food Services Department needs to be managed like a business. The director needs to be involved in budgeting and given responsibility for making changes in the department that will help balance the budget. This includes being aware of revenues and expenses, and taking an active role in making program changes that can improve the department's financial balances. It is also important for food service managers and staff to have the budget explained to them because they can be a valuable resource in making changes and improvements if they understand why they are needed.

The district has a new superintendent and a new chief business official this year, neither of whom were involved in budget projections for the current fiscal year. Because the food service director has not been involved in budget development, it may be prudent to carefully review and revise the cafeteria budget as needed to ensure that projections are accurate.

Recommendations

The district should:

1. Carefully review the cafeteria budget to ensure current projections are accurate and realistic, and make adjustments if needed.
2. Immediately involve the food services director in the budget process by educating him in important aspects of the budgeting, and setting expectations for his role in managing the budget.
3. Eliminate deficit spending in the cafeteria fund by developing and implementing a plan to reduce expenditures and/or increase revenues.
4. Charge the full allowable indirect cost rate to the cafeteria fund.
5. Monitor student participation and MPLH, and find ways to increase student participation and staff productivity.
6. Reduce labor hours to help lower the deficit if revenues cannot be significantly increased.

Staffing and Meals per Labor Hour

Because labor is usually one of the highest expenses in a food service operation, it is important to ensure that staffing ratios are adequate to meet the needs of the program without being excessive. The district's labor costs in the prior two years have been between 65-68% of revenue, and costs for the current year are projected to be 72%. This is excessive and indicates overstaffing. Under best practices, labor costs are approximately 40-45% of revenues.

Another industry-standard way to measure food service staffing is the number of meals served per labor hour (MPLH). This measure is used to assess labor efficiency and help determine appropriate staffing levels. Only labor hours for food service staff at school sites are used in the calculations. Labor hours for management, clerical and warehouse staff are not included because the calculation is a measure of the labor it takes to prepare and serve the meals. It is best practice to maintain an MPLH of approximately 30.

There are several ways to determine MPLH. Breakfasts, lunches, snacks and à la carte sales must be included in the analysis. Breakfasts are sometimes counted as a fraction of a meal equivalent because they are often simpler to prepare than lunches. The breakfasts at the district consist mostly of ready-to-serve items but have some items that require some assembly, so they were counted as a whole meal for this analysis.

FCMAT's calculations also included sales of à la carte items even though the number sold is low. À la carte sales are converted to a meal equivalent based on gross revenue earned. The equivalency factor is an average of the prices for secondary school breakfast and lunch, which in the district is \$2.75. So the daily à la carte sales totals are divided by 2.75 to obtain the total number of meal equivalents.

At high schools, à la carte sales are another way to generate revenue and justify staff labor hours. The district sells very few à la carte items. The stricter nutrition regulations placed on à la carte items have made it more difficult to find foods that students will buy; however, since many students at this age refuse to participate in the meal program, it is worth trying to expand the à la carte offerings to attract these students.

The district includes after-school snacks on its reimbursement claim but it has contracted with an outside provider to manage this program. Because the Food Services Department does not prepare or serve the after-school snacks, they were not included in FCMAT's MPLH analysis.

FCMAT's detailed MPLH analysis is included in Appendix B and is summarized on the following pages. This analysis was prepared using meal count data for the month of October 2016 because October is more representative of the students' current year free or reduced-price meal eligibility and participation. FCMAT also reviewed and compared prior year meal counts to current counts to help determine trends.

FCMAT's analysis indicates that MPLH is low at all schools, with a districtwide average MPLH of 18, which is far lower than the best practice standard of 30. Westmoor High School had the highest MPLH at 24; Jefferson High was at 18; Oceana High was at 16; and Terra Nova High was at 13. Thornton Continuation High School had an MPLH of 1.0, which may be a reporting error because staff indicated and FCMAT observed that 20 to 30 breakfasts and lunches are typically served. If Thornton served the number of meals staff indicated and FCMAT observed, their MPLH would still be extremely low at 8 to 10. The district has 4.0 staff hours per day allotted to Thornton in a position that is currently vacant, even though the food is prepared at and delivered from Jefferson High. This is unusual. Jefferson High should be able to cover the

needs at Thornton, preparing the food as part of its total production, then delivering and serving it to Thornton students.

Another factor in calculating the district's MPLH is that all schools except Thornton also have paid student help. As noted in Appendix B, including student labor the MPLH results in the following MPLH for these schools: Jefferson, 16; Ocean, 15; Terra Nova, 12; Thornton, 1; and Westmoor, 22.

FCMAT's MPLH analysis indicates overstaffing, and FCMAT's observations of meal service support this finding, as does the high labor cost indicated by the budget.

The serving lines at some schools seem inefficient and in some instances disorganized. Because both district staff and the paid student helpers work on the lines, too many people are involved in serving, resulting in very little efficiency. In many cases it took several people to complete one tray. Staff put all items – including packaged condiments at some sites -- on the trays before handing them to students. Because the menus are simple and most items are already packaged, a self-serve system could greatly streamline meal service and would require fewer staff. This is discussed in detail in the menu section of the report.

A comparison of October meal counts for 2014, 2015 and 2016 shows that counts have declined significantly. The district served 26% fewer breakfasts and 39% fewer lunches in October 2016 than in October 2014.

According to the 2016-17 California Longitudinal Pupil Achievement Data System (CALPADS) Certification, enrollment and the number of students eligible for free or reduced-price meals in the current year is down by about 3% compared to 2015. The first 2016-17 CALPADS report the district provided to FCMAT indicated a 12% increase in the number of students eligible for free or reduced-price meals compared to the prior year. Because this seemed unlikely, FCMAT questioned the report and the district realized its numbers were incorrectly inflated. The district's inability to detect this error initially indicates that it is not closely monitoring these important statistics. The food service director and district administrators will need to carefully review these numbers to ensure the district is submitting accurate data to the state. This is essential because this data is used to determine many funding sources in addition to food service funding.

Declining enrollment and eligibility add to the meal participation challenges the Food Services Department faces. High school students tend to participate in meal programs less than younger students because of the stigma of free meals, and those who do not receive free meals often choose not to purchase meals.

As shown on the MPLH analysis, a majority of the meals served are to students who are eligible for free and reduced-price meals, which is expected. The exception is Terra Nova High School, which serves more students who paid for meals than students eligible for free or reduced-price meals, which is unusual.

Terra Nova has the lowest percentage of students who are eligible for free or reduced-price meals. This means that students who pay for their meals are choosing to buy meals. It would benefit the district to determine what is motivating these students to purchase meals, and try to duplicate this pattern in other schools. The district will need to review participation at all schools and find ways to increase it among all students, or it will need to reduce staff.

Surveys can be used to gather student input about the program and what would encourage more students to participate. Marketing of the program is also essential to let students and families know what is offered.

	Oct 2014	Oct 2015	Oct 2016
Enrollment	4,686	4,601	4,437
% Free and Reduced	36.6%	39%	36%
Total Breakfasts/Day	586	596	466
Changes from Oct 2014		2%	-20%
Total Lunches/Day	1,087	1,072	780
Changes from Oct 2014		-1%	-28%

FCMAT's findings of low MPLH numbers are significant, particularly in light of the findings of high labor costs. Addressing this issue will be critical to maintaining the food service program's viability and solvency. The Food Services Department needs to either significantly increase participation or significantly reduce staff. The district and director will need to make this a priority. Close observations of the program at all schools are needed to find ways to improve efficiency and to make reductions where necessary.

Food Services Department employees consistently stated the opinion that the department is severely understaffed because in the past there were more people working at all schools. Staff do not appear to have a good understanding of efficient methods or a vision for improvement. Both budget and staffing issues need to be discussed with all food service staff so they understand the reality of the department's situation.

Many staff members indicated that it is difficult to hire and retain qualified food service staff because of low salaries and part-time positions. Full benefits are offered at four hours per day, thus all site positions except managers are less than four hours per day. This is not uncommon but it decreases the incentive for staff to stay in their jobs.

One staffing option that may be feasible in the future is to have fewer positions at school sites but increase one of the three-hour-per-day positions to five hours. This would allow a backup position to the manager, help with preparation and clean-up, and give some incentive for staff to stay with the district. This option would have to be analyzed carefully, particularly the workload and cost of benefits.

Having inexperienced and unskilled staff probably contributes to the low level of productivity. However, even site managers do not seem to be knowledgeable regarding efficient work habits or realize this is a problem. The director needs to work with staff to identify areas that could be improved and positions that may not be necessary. Staff need to understand that work habits and serving methods can be improved to accomplish goals with current staffing or even with reduced hours.

Any reorganization of the food service program needs to include an examination of all aspects of production and service; however, one area of special concern is breakfasts. Students are offered a choice of having breakfast before school or at midmorning break, which is called brunch. All schools reported that their before-school breakfast counts are extremely low – in some cases only three per day. The majority of breakfast meals are served at midmorning brunch, which is typical for high school students: they often arrive at school just before classes start or are not hungry first thing in the morning. By midmorning they are awake and hungry and it is common for meal counts to be higher at this time.

Eliminating before-school breakfast would not only align breakfast service with students' needs, but also help increase staffing efficiency. A common concern among site managers was that they

are the only individual at their respective schools who works more than 3.5 hours per day and they do not have sufficient time for preparation and end-of-day cleanup. They indicated that a common reason for staff overtime is because there is not enough time for cleanup at the end of lunch. Eliminating early morning breakfast preparation and service could allow staff to complete more production for the other meals. Or their schedules could be adjusted so they come in 30 to 60 minutes later and leave later, giving them more time for cleanup at the end of the day.

At some schools some of the kitchen personnel were not involved in serving meals. Sometimes the managers were not participating and sometimes other staff were not. Because multiple points of sale are needed for the most efficient service, every employee on duty needs to participate in the serving lines. In some instances this would allow another point of sale to be opened, such as another meal line or a snack bar. At some of the more overstaffed sites it would allow a reduction in staff without affecting meal service.

Recommendations

The district should:

1. Carefully study productivity at all schools to determine ways to improve meal production and service practices. Conduct additional staff training to achieve these improvements.
2. Reorganize staffing and duties, and make staffing reductions as needed to achieve better staffing and a higher MPLH. Establish goals for MPLH consistent with best practice. Ensure that staff are aware of this and of the expectation that they will help achieve these goals.
3. Ensure that all staff on duty at meal times participate in a serving line, or staff an additional point of sale, to improve efficiency.
4. Reduce food service staffing if student participation in the program does not increase. Carefully review any vacant positions before filling them, and do not fill positions if MPLH numbers remain low.
5. Do not fill the vacant four-hour-per-day position at Thornton. Instead, reorganize duties at Jefferson and use current Jefferson staff to prepare meals for both schools and to deliver and serve meals to Thornton.
6. Consider eliminating before-school breakfast service and only serving breakfast at brunch. If this is done, consider changing site managers' and other employees' schedules for more program efficiency.
7. Consider increasing à la carte sales, including entrées, to serve more students and increase revenue.
8. Have the food services director review meal participation patterns and try to find ways to increase the number of students participating.
9. Ensure that the food services director and district administrators carefully review annual free and reduced-price meal statistics in CALPADS reports to make sure they are correct. Have the food services director review enrollment

in and eligibility for the food service system once a month throughout the year, and when claims are prepared.

10. Ensure that the food services director carefully reviews weekly and monthly meal count reports before they are submitted to ensure accuracy.
11. Analyze the cost of reducing total staff positions and possibly increasing the hours of one position at each school to improve efficiency and staff retention.

Meal Program

Nutritional Requirements

The district participates in the National School Lunch and Breakfast programs, which are regulated by the United States Department of Agriculture (USDA) and the California Department of Education (CDE). Regulations were updated in 2010 during the federal reauthorization of the program; these were the most comprehensive changes to the program in 15 years. Initial guidelines became effective in the 2012-13 school year and have become stricter since.

Section 9(a)(4) of the Richard B. Russell National School Lunch Act (NSLA) requires that school meals reflect the latest Dietary Guidelines for Americans (Title 42 United States Code Section 1758(a)(4)). In addition, Section 201 of the Healthy Hunger-Free Kids Act of 2010 amended Section 4(b) of the NSLA to require the USDA to issue regulations to update the meal patterns and nutrition standards for school lunches and breakfasts based on the recommendations issued by the Food and Nutrition Board of the National Research Council of the National Academy of Sciences (Title 42 United States Code Section 1753(b)). The following websites contain additional information regarding these issues:

<http://www.fns.usda.gov/sites/default/files/NSLA.pdf>

<https://www.fns.usda.gov/school-meals/healthy-hunger-free-kids-act>

These regulations seek to increase the availability of fruits, vegetables, whole grains, and fat-free and low-fat milk; reduce the levels of sodium, saturated fat and trans fat; and meet students' nutritional needs within specified calorie requirements. The intent is to provide meals that are high in nutrients and low in calories, which better meets students' dietary needs and protects their health.

In addition to requirements for more fruits and vegetables, districts must offer a wider variety of vegetables, including specified weekly amounts of vegetable subgroups. These subgroups include dark green, red/orange, starchy, and legumes. This is sound nutritionally but has complicated menu planning and, to some extent, student acceptance. In high schools, a full cup of fruit must be offered at breakfast, and one cup each of fruit and vegetables must be offered at lunch. Students must take at least half a cup of either fruits or vegetables whether they want it or not. Districts have seen an increase in wasted food as a result of this requirement.

Offer versus serve is a meal planning option that allows students to decline some of the food offered in a reimbursable meal. The goal is to reduce food waste (and extra expense) and permit students to choose the foods they want to eat. At least five items must be offered at lunch and four at breakfast, but students are only required to take three items at either meal. Other than the requirement that one of the items be a fruit or vegetable, students may choose or refuse whatever they want. Regulations require offer versus serve at high schools, and it is strongly encouraged at other grade levels.

FCMAT's observations during fieldwork made it apparent that the district's food service staff need more training in offer versus serve. Although managers seemed to be aware of the requirements, staff at schools were not consistently serving complete meals. At one brunch FCMAT observed no fruit or juice was offered. The manager said they had a problem with the delivery of fruit, and although they had juice on hand they did not serve it. This meant that none of the students served had a complete meal. The state could deny the district's claim for reimbursement for these meals. Staff at other schools were either unaware of the requirements or were not paying

attention to what students were taking; FCMAT observed many incomplete meals served either because they did not include enough items or no fruit or vegetable was taken. More training and oversight is needed in this area.

Menus

The district has weekly districtwide menus, with four entrées and the required side dishes offered each day. The daily entrées include a dish partially or fully cooked from scratch, such as pasta with meatballs, taco salad, chicken with rice and vegetables, nachos, or chicken burritos. Pizza and hot and cold sandwiches are also offered. These types of foods are typically appealing to high school students, but any menu can be monotonous, and preferences often vary among students and at different schools.

Managers indicated that their students do not like all the menu items and sometimes request other things. Some managers are making substitutions based on what they think their students like; some make different entrées or do not serve certain items if they feel the students won't want them. It is good for staff to have input on menu offerings, but it is vital that any changes be discussed and approved by the director. If they are not, it could cause problems with inventory, costs, and compliance with nutritional requirements. To best serve the students and meet requirements, the director needs to hold regular meetings with site managers to discuss the menus. It would also be beneficial to survey students regarding their preferences. At several schools when FCMAT asked students what entrées they would like to see, they had very strong opinions and commonly asked for some of the items that were offered last year, like chili baked potato and fish tacos. One manager indicated a desire to make pizza from scratch and felt they have time to do so. Perhaps a predetermined chef's choice item could be offered once or twice a month; this item could be different at different schools. All items to be offered would need to be analyzed to ensure they comply with all nutritional requirements.

The fruit and vegetable selections were limited. Although the menu lists a fresh fruit variety for breakfast and lunch, most of the schools offered only one type of fruit with each meal, and much of the fruit was canned. A fresh fruit variety indicates a selection of fruits. The easiest and most attractive way to achieve this is to have a fresh fruit bowl with several types of fruit (e.g., apples, oranges, bananas).

Regulations require that high school students be offered one cup of vegetables and one cup of fruit at lunch, and one cup of fruit at breakfast. The district's schools are not consistently doing this. Baked French fries (which count as a vegetable) are offered daily but only with specific entrées, so not all students have this choice. Because students are only required to take half a cup, it is best to offer at least two selections in half-cup portions so there is less waste. The only fresh vegetable offered was carrot sticks; no side salads were offered. Many staff members stated that students have requested salads. Many districts offer salad bars with a wide variety of vegetables and fruits. This is an appealing way to give variety and encourage students to take fruits and vegetables. It also makes it easy to include required types of vegetables on the menu. Staff at one school said the product used for chow mein vegetables was not appealing to their Asian students, so they were not serving it. Staff at other schools said the three-bean salad is not popular with students. The requirement that students take a fruit or vegetable makes it important to pay attention to items they may prefer. The director and managers need to communicate on these types of issues and develop better solutions. The three-bean salad is offered to meet the weekly legume requirement, but serving ranch beans or baked beans with some of the hot sandwiches instead may prove more popular with students and thus more successful.

Students at several schools indicated that the food served is often burnt, or served cold when it should be hot, and that it often lacks spices. FCMAT also observed that some of the items served were burnt, and at one school some of the pizzas appeared to be undercooked while others were burnt on the edges. Some schools had products that were past their use by date, such as packaged carrot sticks. Items cooked partially or fully from scratch, such as Teriyaki chicken and rice, looked and smelled appealing. However, many of the entrées, such as sliced pizza and hot ham and cheese sandwiches, were wrapped in foil with no identification. This is not appealing to students. Similarly, many of the fruits and vegetables offered were in opaque covered plastic containers, making it difficult to determine the contents. The only other vegetables and fruits served were packaged carrots and, at most schools, a small bowl of fresh apples. Better monitoring of food quality, and better packaging and more attractive displays for food, would make the food more appealing. The lack of attention to these areas may be one reason for declining participation. Site managers and the director need to address this.

Other than some possible problems with the amount of fruit and vegetables being offered, the menus appear to have the components required by regulations. However, it is not clear whether the menus meet the nutritional requirements. A sample analysis of the menus from the week of Jan 9-13, 2017 indicated that they did not meet calorie requirements. The calorie targets for high school students are 450-600 calories for breakfast and 750-850 at lunch. The analysis done by the district and provided to FCMAT showed that the district's breakfast had 999 calories (67% to 122% higher than the target), and lunch had 2,517 calories (196% to 236% higher than the target). Sodium content was also far in excess of allowable limits. However, FCMAT's observations of meals served and review of written menus did not support the levels of sodium and calorie counts, so it is probably an error in the way the menus were analyzed. It is important for the director to pay attention to these details and carefully review results to detect and correct any errors and determine whether the menus meet legal requirements.

The number and variety of à la carte items offered are limited. Typically items include water, vitamin water, Gatorade, and baked chips. Some schools do not offer à la carte items every day. Nutritional regulations have limited what schools can sell as à la carte; however, food vendors have made great strides in modifying products to comply with regulations. High school students want choices, so it would benefit the district to make à la carte items more available and to consider selling some entrées as à la carte items. Districts often hesitate to sell entrées separately because of concerns about interfering with meal participation. However, because many students aren't buying meals, offering à la carte entrées may give them options as well as create revenue for the department. It also may help students change their perception of the school meals and thus increase participation. Any entrée in the meal program may be sold separately as long as it meets guidelines: the entrée must contain 400 calories or less, no more than four grams of fat per 100 calories (36%), and less than one half gram of trans-fat. A list of allowable foods is included in the Appendix C.

Serving Lines and Meal Service

FCMAT visited each of the district's schools and observed before-school breakfasts, midmorning brunches, and lunches. Most of the meal service appeared inefficient; some was disorganized because too many people were involved. Lines were long, and all lines were set up in typical cafeteria style, with steam tables separated behind glassed-in counters. All items are placed on the trays for students, even wrapped items that could be self-serve. In many instances it took two to three staff members to serve one tray, with one placing a wrapped entrée and the others placing sides or packaged condiments on the tray.

Many high schools set up their lines for self service, and many districts use serving carts called speed lines, which are two-sided open serving carts that can be heated or chilled. This allows for the most efficient service. The district's schools have well-equipped kitchens and single-sided serving lines, but they are not compatible with double sided speed lines. However, the schools have multiple serving stations that allow for two or more lines of students. If the district removed the glass from the serving areas, the counters it uses could be made self-serve, which would be faster and require fewer staff. Entrées cooked from scratch could be portioned and wrapped ahead of time, or would need to be served behind sneeze guards. At some schools pizza was portioned and wrapped ahead of time; others dished it to order on plates. It looks more appealing not wrapped; it could be portioned on a plate or tray and served behind a sneeze guard. Serving to order makes the meal seem more home cooked but also slows the lines. It would be beneficial for the director and key staff to visit other school districts to gain new ideas, such as self-service and packaging methods.

All of the schools have snack bar windows in their kitchens from which they previously offered à la carte items and/or reimbursable meals. If the district chooses to offer more à la carte items, these windows could be used to reduce congestion in the main serving areas. Terra Nova High School has a large snack bar in a separate building, down the hall from the main kitchen, but it has not been used for several years. Because Terra Nova has few students who qualify for free or reduced-price meals, à la carte sales may be appealing to students. Because the snack bar is located by an open quad area, it could work well as an optional serving space. The current serving lines are significantly disorganized and inefficient. The manager at this school has been with the district for 19 years but is new to this location. She stated that all of her staff are new to the district and have had no previous food service experience. Although it would likely be of benefit, reopening the snack bar would best be done only after food service at this location improves in skill and efficiency. There is a snack bar window in the main kitchen that could be used to sell snack items and à la carte entrées as a test to determine if there is sufficient demand. One of the current staff members could move to the window, which would reduce some of the congestion of staff on the lines. Training these staff members needs to be a priority. The manager is trying to work with staff but is also involved in daily operations. The director needs to spend time at Terra Nova helping staff streamline the service and gain more confidence in their job skills.

At Thornton High School, food is delivered by Jefferson High School food service staff, but the school librarian serves the food and operates the point-of-sales equipment with some assistance from a student helper. The lines were disorganized and disorderly, and many students were not taking complete meals. The food offered did not match the menu, but consisted of a variety of entrées, apparently as a result of using leftovers. As noted earlier in the discussion of MPLH, the number of meals served at Thornton does not match the claim form counts. This indicates that many students are taking food but not being captured in the counts. The food service director needs to observe and correct the situation. There used to be a four-hour-per-day food service worker at Thornton, which is more hours than needed. The district will either need to provide more training and ongoing oversight of the Thornton server, or have one of the food service positions from Jefferson take over service at Thornton.

Recommendations

The district should:

1. Provide staff with ongoing training in the requirements of the meal program, especially offer versus serve, so complete meals are being served.

2. Review menus to ensure meal components are being offered in required amounts, especially fruits and vegetables. Make sure at least one cup total of vegetables is offered to all students daily, but consider using half-cup serving sizes to increase choices and reduce waste. Also consider not limiting popular vegetables to specific menu pairings (such as baked French fries only with hot sandwiches).
3. Use salad bars to improve vegetable choices and help meet nutritional guidelines.
4. Offer a true fresh fruit variety consisting of several types of seasonal fruits in a self-serve fruit bowl.
5. Ensure that the food service director and site managers hold menu planning meetings so new items can be tried and unpopular items replaced. Consider allowing schools to offer chef's specials 1-2 times a month based on their students' preferences. Ensure that these specials are approved and planned in advance, placed on the menu, and analyzed.
6. Pay closer attention to menu analysis to ensure it is done correctly and meets requirements.
7. Change serving lines to improve efficiency, including implementing self-serve lines. Allow students to serve themselves fruits, vegetables, condiments and milk even in lines that are not self-service.
8. Review packaging methods and try to find more attractive containers or see-through wraps. Display foods such as fresh fruits and vegetables in an attractive bowl or basket or in a salad bar so they are more appealing. Have food service staff and managers visit other schools and/or talk with vendors to find more attractive ways to package and display foods.
9. Increase the number and variety of à la carte items offered at all schools, and include some entrées as à la carte items. Consider selling these items in the main meal lines or at the snack bars.
10. Have the food services director visit schools frequently to observe food production, meal service and quality control, and to work with staff on efficient methods and food service skills. Make Thornton High School a high priority but ensure ongoing oversight at all schools.

Training and Leadership

According to the food services director, no regular meetings of the entire food service staff have been held in the past. The managers meet with the director once a year, before school starts. All the site managers have taken food safety courses and are Serve-Safe Certified. The managers need to meet with the director monthly or every other month. There are many issues to discuss and collaborate on including but not limited to program requirements, food safety, line efficiencies, menus, student preferences, and staff issues.

Many of the three-hour-per-day employees are new to the district and to food service and thus need training. The district has at least one person at each site who is Serve-Safe Certified, but this is not sufficient.

The Child Nutrition Act includes regulations regarding staff competency and regular training. These requirements have been in effect since July 1, 2015 and mandate professional standards and annual training requirements for Child Nutrition directors, managers and staff.

The requirements vary for each position, but trainings must be documented and must be evaluated during administrative reviews. The district's Food Services Department was cited for a lack of training in the state's Administrative Review conducted in spring 2016. Specifically, the district was cited for not having a training plan and was instructed to create a training plan as a corrective action plan, and the plan was submitted to the state but has not yet been implemented.

All food service staff need, at a minimum, safety training provided by the director as well as regular reminders from managers. Staff also need to have frequent short meetings on site with the director or their manager to receive training in all aspects of the program. These can be 10-15 minute sessions with information handouts and can be documented with participant sign-in sheets.

Managers and some employees seem knowledgeable about food service program requirements, but many staff either do not fully understand them or simply do not follow them consistently. One example is the failure to ensure that students have all the component items required for a complete reimbursable meal, as discussed earlier. Many students leave the serving area without a complete meal. Staff training will need to include program requirements as well as food service skills and efficiency measures.

Student helpers will also need basic training regarding program requirements and food safety. Some students were eating foods (French fries) in the line while they were working. Eating on the lines or the kitchens should not be allowed because it can compromise food safety. Because students work few hours, training can get overlooked. All students need to be given appropriate training when they are hired, including handouts and a brief verbal discussion of program requirements and food safety topics. It is a best practice to repeat this type of training at least once a year and whenever managers notice that the students may need a reminder of proper procedures.

Training is an important aspect of leadership. The director needs to make sure that staff have the knowledge and skills they require for the job and that the program is in compliance with requirements.

Information about the Child Nutrition Act mandate and training resources can be found at <http://professionalstandards.nal.usda.gov/>.

Recommendations

The district should:

1. Ensure the director holds a meeting with all food services staff before the start of each school year.
2. Ensure that the director holds meetings monthly or every other month with managers. Topics should include food safety refreshers, program requirements, and menu planning. Managers and the director should discuss which menu items are working and which new items to try.
3. Provide the three-hour-per-day food service employees with short training sessions regularly throughout the year that cover all aspects of the program.
4. Ensure the director and site managers offer hands-on training to staff members, especially new and inexperienced ones.
5. Ensure student helpers are given training before they begin, including hand-outs on important aspects of the job. Provide student helpers with annual training and retraining as needed.
6. Implement and document all employee trainings as required by the professional standards regulations and as directed on the 2016 Administrative Review.

Wellness Policy

School districts that participate in the National School Lunch Program have been required to have wellness policies since 2006. This requirement is part of the federal Child Nutrition Reauthorization Act of 2004.

The Healthy Hunger-Free Kids Act of 2010 specified additional requirements for wellness policies, including the following:

1. Designate one or more school officials to ensure that the school complies with the policy.
2. Include goals for nutrition promotion.
3. Expand the committee members to include physical education teachers and school health professionals.
4. Inform and update the public about the content and implementation of the policy.

The district has a wellness policy that meets these requirements. However, it has not had a wellness committee or a board report in approximately four years and is thus out of compliance with this aspect of the regulations. The district hired a new student services director this school year who has been assigned to reestablish the wellness committee. A wellness coordinator has been designated and the district has a plan to resume wellness committee meetings in the spring of 2017.

Many valuable resources regarding wellness plan requirements can be found on the CDE website at <http://www.cde.ca.gov/ls/nu/po/ceffocalwell.asp>. Appendix D contains a chart that compares the 2004 and 2010 regulations in the Child Nutrition Reauthorization Act for those years.

Recommendations

The district should:

1. Choose wellness committee members as prescribed in the regulations.
2. Begin holding wellness committee meetings regularly.
3. Monitor the wellness plan's progress and effectiveness, and document its implementation.
4. Report on the plan to the governing board and the public at least once a year as required.

Food Safety Program

The Child Nutrition and WIC [Women, Infants and Children] Reauthorization Act of 2004 required school food authorities to implement a food safety program based on hazard analysis and critical control points (HACCP) principles at each preparation and service facility that participates in the National School Lunch or School Breakfast Program. HACCP is a systematic approach to building food safety and reducing the risk of food-borne hazards. It accomplishes this by focusing on each step of food preparation from receiving to service.

A district's food safety program must include a written plan for each school and be based on HACCP principles. The district's Food Services Department does not have a complete food safety program. The department needs to develop a written HACCP plan that meets federal requirements. It is a best practice to also ensure that such a plan includes standard operating procedures (SOPs) for each site. There are online plan templates that can be copied and adjusted to the district's specific needs. Because this legal requirement has been in place since 2004, it is imperative that the district develop and implement such a plan as soon as possible.

Staff training is an essential part of HACCP and any good food safety program. Food service staff need to receive training at least annually as well as ongoing training throughout the year. Some staff have received training but others stated they needed training. Warehouse and delivery staff also need to receive training, particularly in safe food storage and transport. One of the most important aspects of an HACCP program is monitoring the entire system, including at both the site level and management level. The director needs to visit all sites and evaluate how well staff are maintaining HACCP logs and complying with regulations.

Some of the staff at two schools lack a thorough understanding of the California Health and Safety Code (CHSC). FCMAT observed a staff member in the food preparation area with very long fingernails (possibly artificial) and with nail polish. The staff member was not wearing gloves. Other staff members observed did not have proper hair restraint. These are both violations of the CHSC section 113973, which states:

- (a) Single-use gloves shall be worn when contacting food and food-contact surfaces if the employee has any cuts, sores, rashes, artificial nails, nail polish, rings (other than a plain ring, such as a wedding band), un-cleanable orthopedic support devices, or fingernails that are not clean, smooth, or neatly trimmed. In section 113969 it states:
 - (a) Except as specified in subdivision (b), all food employees preparing, serving, or handling food or utensils shall wear hair restraints such as hats, hair coverings, or nets which are designed and worn to effectively keep their hair from contacting non-pre-packaged food, clean equipment, utensils, linens, and unwrapped single-use articles.

The district needs to provide regular and ongoing training in these areas.

Employees indicated that the district has no written statements or policies for food service staff regarding dress or behavior. Having such policies is an easy way to ensure all staff have access to food and workplace safety information. Many districts have found it beneficial to have written dress codes and other health statements. These written statements can specify acceptable hair restraint, non-skid shoes, long pants, and fingernail policy. It is a best practice to have employees sign these statements annually to indicate their understanding and consent. The statements can also be part of employee evaluations.

Recommendations

The district should:

1. Develop an HACCP plan that meets the federal requirements.
2. Provide training at least once a year on HACCP, and implement procedures for monitoring the program through site visits to ensure staff are meeting log requirements and implementing standard operating procedures.
3. Ensure that all food service, warehouse and delivery staff receive basic training on food safety and its importance as it applies to their work areas.
4. Train all staff regularly regarding CHSC requirements, and include them as part of administrators' site visits and monitoring.
5. Create a dress code and safety policy for the Food Services Department. Include items such as the need to wear non-skid shoes and long pants in kitchen work areas, rules against sleeveless shirts, a policy on fingernails, and other items that affect workplace health and food safety.

Competitive Food Sales

The Healthy Hunger-Free Kids Act of 2010 states that nutrition standards apply to all foods sold outside the school meal programs on the school campus at any time during the school day. These regulations are intended to improve the health and wellbeing of children, increase consumption of healthy foods during the school day, and create an environment that helps children develop healthy eating habits. The act sets minimum standards for food and beverages.

Competitive foods and beverages are those sold at school but outside of and in competition with the federally reimbursable meal programs. Examples include items sold during the school day in student stores, à la carte items sold by the food service department, items sold at fundraisers, and items in vending machines. More detailed information can be found on the CDE website at <http://www.cde.ca.gov/ls/nu/he/compfoods.asp>.

The district's schools host a food day four times a year, during which various clubs prepare and sell foods such as crepes, pulled pork, pizza and many other items at school. FCMAT observed posters advertising food items to be offered outside of the federal meal programs that may not meet the competitive food law's nutritional requirements. School administrators said the activities coordinator approved the food items being offered for sale. However, compliance with competitive food laws would require that recipes be analyzed and purchased products checked to make sure they meet the strict guidelines for food being sold on campus. Specifically, requirements state that bread must be at least 51% whole grain, that an item cannot have more than 350 calories, more than 35% fat and sugar, more than 10% saturated fat, more than 5 grams of trans fat, or more than 480 milligrams of sodium. The beverages offered in the sale appeared to have added sugar; the rice did not appear to be brown rice as would be needed to meet requirements, and the pizza crust, crepes and buns for pulled pork did not appear to be made from at least 51% whole grains. It is also doubtful that these items were within the calorie, fat and sodium limits. Many of the food items were to be cooked on campus, which is also a violation of the law. The food day event itself is not prohibited; high school clubs are allowed to hold four food sales per year on the same day. However, the district needs to ensure all food regulations are followed.

District and school site staff consistently reported that school sites do not pay close attention to food sales regulations and that the sales are not in compliance. FCMAT noted that vending machines are used at all schools, with the income going to the Associated Student Body. This is not uncommon and not a violation of regulations; however, the items offered in the vending machines are the same as items offered by the Food Services Department, which is contrary to regulations. Regulations state that one student group may sell three food categories each day, but they must not be the same as what the food service program is selling. Food service staff at some schools stated that they have almost stopped selling à la carte snack foods because the students can buy them out of the vending machines.

The school and district administrators need to review the food sale regulations and determine whether they can modify their menu items and procedures to bring the district into compliance with regulations; if not, they will need to cease sales that are not in compliance.

The lack of understanding of nutrition regulations is not uncommon; some school districts have found it beneficial to have the food services director give a summary presentation of the regulations at district administrators' meetings to increase awareness of these requirements. Some districts have an online system to request permission for fundraising activities, including any food items to be offered. The system requires requesters to complete an application form that the food

services department reviews and approves or denies before the activity takes place to ensure sales comply with regulations.

Noncompliance with child nutrition regulations can result in loss of all state and federal child nutrition funding. Continued review and communication of the regulations and monitoring of food sale activities on campuses is essential to ensuring compliance. School site administrators need to be accountable for adhering to procedures and ensuring compliance.

Recommendations

The district should:

1. Review competitive food sales regulations with all school sites, and hold school administrators accountable for adherence to regulations on their campuses. Have district administrators closely monitor schools to ensure compliance.
2. Provide guidance to schools regularly regarding competitive food sales regulations, and oversee sales of all food items districtwide.
3. Establish a system for schools student groups and clubs to request permission for fundraising and associated food sales. Ensure that the Food Services Department is involved in the approval process.

Personnel Activity Reports

Personnel Activity Reports (PARS) are detailed documents that justify the salaries for employees who work in more than one role or program by identifying the percentage or hours of the employee's daily activity, and thus the cost, attributable to each program. The federal requirements for PARS (Code of Federal Regulations, Title 2, Part 225, Appendix B 8 h) state that PARS documentation must:

- Reflect an after-the-fact distribution of the actual activity of each employee
- Account for the total activity for which each employee is compensated
- Be prepared at least monthly and must coincide with one or more pay periods
- Be signed by the employee
- They are not budget estimates or distribution percentages determined before the services were performed.

The Food Services Department funds part of the salary of one delivery driver and one warehouse staff member. According to the food services director, funding for these two positions comes partly from the cafeteria fund and partly from the general fund. The district does not have the correct PARS documentation for these two employees. For one employee the district has a position coding/position control sheet that states how much is being charged to Fund 13. Documentation on the other employee shows that the position is funded completely from Fund 01 and therefore a PARS is not needed. However, to be employees of food services paid out of Fund 13, these employees need to have the correct PARS hourly documentation or an approved alternate.

Alternate methods of time accounting documentation are available that are not as time-consuming as PARS and that the district may be able to use in lieu of PARS if an employee is eligible for them. Specifically, the United States Department of Education (USDE) has approved two systems for time accounting that can take the place of PARS for eligible employees. It is allowable to use these for some employees funded from multiple programs if the times these employees work in the different programs do not vary.

One method, called the sampling method, has been approved for California local educational agencies (LEAs) since 1998. It requires PARS documentation, but less frequently than normal PARS reporting. This method allows a district to collect PARS documentation from employees every fourth month (three times a year) for the first year, reconciling actual hours worked to budgeted hours. After the first full year, a district collect documentation three times a year or two times a year if the deviation between total estimated (budgeted) and actual hours worked is consistently less than 10%.

A second and newer method approved by USDE for California LEAs is based on an employee's predetermined schedule and is usually used with instructional staff. This method was approved in September 2012. It is subject to prior approval by the CDE. The LEA must send the CDE a management certification that it will include only eligible employees in this method and that the system used to document employee work schedules includes sufficient controls to ensure accuracy.

The predetermined schedule method is legitimate only if the employees:

- Perform work on schedules that include activities objectives in more than one or program with costs attributable to each, or activities that would otherwise require PARS
- Work on these objectives or activities based on a predetermined schedule
- Do not work on multiple activities or objectives at exactly the same time

More details about these alternate methods may be found in The California School Accounting Manual (CSAM), which has been updated to include them. In April 2013 the CDE sent out a letter describing the predetermined schedule method; the letter may be found at <http://www.cde.ca.gov/fg/ac/co/index.asp>.

Recommendations

The district should:

1. Make sure salaries charged to the cafeteria funds are allowable.
2. Start to document salaries paid for from multiple funds by using monthly PARS.
3. If it wishes to use an alternate method of accounting documentation for these salaries, ensure that the alternative method is followed carefully and in accordance with regulations described in the CSAM.

Facilities

Properly maintained kitchen facilities and equipment are essential to a district's food safety program based on HACCP, and to the safety of staff.

FCMAT visited all of the district's schools, assessed the size and condition of each food service location, and found all in adequate condition. The cleanliness of each location was satisfactory. Food services staff seem to take pride in their kitchens and were interested in keeping them in working order.

Some of the district's schools have newer combination ovens, but staff stated that some of these ovens were broken and some indicated they did not understand how to operate them correctly. Several types of new combination or infrared ovens can decrease cooking time and speed up production. Some of these new technologies are more expensive initially but cost effective over time and thus worth considering as replacements when old ovens become irreparable.

Some schools have new equipment, and most kitchens have been remodeled in the last few years. The remodeled kitchens' walls are covered in fiber reinforced plastic sheeting (FRP). This product is easy to clean, durable and low maintenance. It can be sprayed with a high-pressure hose or simply wiped with a washrag. It will not chip or flake off like a painted surface.

Other locations showed signs of wear and, although adequate, are in need of remodel. For example, the kitchen at Oceana High School is old but still functioning adequately. The walls at this school are older and do not have FRP; the paint is chipping and the walls need to be repainted. One area that needs immediate attention is directly above the wooden baker's table. Bowls stored on the shelf above the table have started chipping the paint off the wall, which could cause physical contamination to the food being prepared below the shelf. A quick solution would be to attach a narrow strip of FRP over the chipped wall area so the bowls will not chip the paint. The wall corners also show signs of chipping and need to be covered with plastic corner protection. Left uncorrected, these items could be identified as concerns during local health department inspections.

The kitchens are more than adequate for the volume of meals being produced. As a rule of thumb, one square foot of kitchen space is needed for each full meal produced. Based on this measure, the district's kitchens are large enough to accommodate double their current production.

Recommendations

The district should:

1. Train staff in different cooking techniques using the combination ovens.
2. Ensure that sections of walls where paint is chipped at Oceana High School are repaired or covered with FRP or other suitable products.

Marketing

Participation in the child nutrition program has decreased at most California schools over the past few years. This may be due in part to negative media reports and in part to numerous changes in child nutrition laws and regulations. In addition, students are regularly exposed to advertisements for foods that appear more appealing because they do not have to meet the same nutritional requirements as school meals. Often school food is mistakenly viewed as low quality even though the opposite is true.

As a result of these trends, it has become increasingly important for school districts to improve strategies for meal offerings and marketing. Both parents and students need to be informed frequently of the value and quality of school meals.

Because many parents are used to getting information from the Internet, a district's website can be an effective way to communicate what the Food Services Department is doing. However, the district's website has only basic information about food services and does not emphasize the quality of the program. Food services is not included in the list of district departments on the site.

It is best practice for the food services section of a district website to include information about changes in nutrition regulations, changes in meal offerings, and a myriad of nutritional information about the school's menus, including examples of ways teachers and parents can help comply with the new dietary guidelines. For parents who do not regularly view the website, a district can include information and communications in materials routinely sent home with students. These could include items from the website or other communications depicting the value of school meals, including their affordability and improved nutritional value compared to ones sent from home or purchased elsewhere. Open house, back-to-school night and other school events also provide opportunities to communicate information and even offer samples of foods.

The district's school kitchens, cafeterias and other eating areas also present an opportunity for improved marketing. Students will look at the eating area and foods offered before selecting what to eat. None of the district's schools have signage to clearly identify the cafeteria, and many eating areas have no signage other than white boards listing some of the day's food items and a few paper enter and exit signs that were curling at the corners.

Students want to see professionalism and signage that will excite them. Westmoor High School has three well-equipped and appealing serving areas, each with a different menu theme that was reported to consistently offer similar meal options throughout the year (e.g., pizza, bun items, items made from scratch). Because these areas serve similar food items each day, it might benefit the district to label each with an appropriately themed name such as Mom's Home Cooking, The Pizza Place, Garden Salad Bar, or Taste of Italy. Westmoor and other schools FCMAT visited have large wall areas above the serving areas that are a perfect place to hang banners with themed names. Themes could also include the school mascot, such as Rams Sandwich shop or Cougar Garden Salad Bar, or other creative names that pique students' interest. Signage does not need to be permanent; removable banners can work well, especially if the line needs to change in the future.

Another option is to attach to the wall permanent frames with Plexiglass that allow the information inside to be changed and updated as needed. When the cafeteria environment more closely emulates the look and feel of a restaurant, students will feel more comfortable and be more likely to come in and eat. Colorful posters can also market foods offered and encourage student participation. Schools can order complete sets of such posters at <http://www.fns.usda>.

gov/team-nutrition/elementary-posters. The Dairy Council is also an excellent resource for this material. Some schools have found it beneficial to involve the school art department. Often a food service department will purchase the paint and supplies and allow student-produced murals to be painted on blank cafeteria walls. Food service staff can also be involved by helping come up with mural ideas.

Although visual appeal is important, students also need to feel welcomed. This is not happening consistently at the district's schools and is particularly lacking at one school, where several students indicated that staff were grumpy, mean and demanding. Students stated that they were even yelled at by staff. This school has also seen the largest decrease in participation over the past year. Staff need to understand that poor attitude and demeanor will drive students away even if the food presentation is excellent. The importance of a welcoming attitude and demeanor needs to be part of employee training and evaluations.

Another way to market the food service program is to invite a local chef to come and prepare an entrée or special vegetable recipe that meets nutritional requirements. Allow the chef to prepare the food in front of students at a 15-minute student assembly just before lunch. This food item could then be served at lunch that day or week. If a chef cannot be found, having a staff member or supervisor do the cooking demonstration can also work well.

Districts can also increase student participation by having students help develop part of all of one month's menus, and then serve meals that include student-approved items. Students would need to be instructed about the necessary components of a meal, but student participation can improve marketability.

Establishing a program that recognizes students for their help in some way, such as placing their names on the menu for that month, can also encourage participation. Students could also be invited to help with formal taste testing of possible new menu items, including both heat-and-eat products and recipes cooked from scratch. Some California schools have also offered free samples as students pass through the lunch line and sought students' feedback. It is also important to post the results of taste tests on menus, on cafeteria walls, or in the serving lines. The goal is to create enthusiasm by including staff and students in menu planning, and using that enthusiasm to encourage increased participation.

Recommendations

The district should:

1. Increase and/or improve marketing strategies to promote school meal offerings and help make participation desirable.
2. Increase and/or improve communication with parents and students about meal offerings. Include information about the value of school meals.
3. Update its website to include a link to the Food Services Department section of the site, and update that section to emphasize the quality and nutritional benefits of the program.
4. Assess and improve signage at each school to ensure the building where the cafeteria is located is clearly identified. Make the signage personal for each school, incorporating the school mascot or logo.

5. Ensure that serving locations clearly identify food items offered and/or the theme of the location; if possible, state the items and prices on smaller signage.
6. Ensure that all food service staff provide a friendly and inviting environment in and around food service areas.
7. Implement strategies to create enthusiasm and participation in the nutrition program, such as partnering with art department to create signage and promotional materials, and/or inviting a chef to perform a culinary demonstration, then serving those items on menus.
8. Involve students in menu planning, and implement ways to recognize them for their help.

Purchasing

Careful and accurate ordering and purchasing are high priorities for food services. Districts that fail to closely monitor purchases may experience deficit spending. When schools cook from scratch, food expenses can be low but labor is usually high; when they purchase prepared items, food costs are higher but labor costs can be lower.

The district's Food Services Department purchases the majority of its food and supplies from two vendors; it does not participate in any formal quote or bidding process for food and supplies. Often purveyors do not offer their best prices to small districts such as Jefferson, and a perceived lack of competition from other vendors can also keep prices high. There are several options the district could try to obtain lower pricing.

One option is for the Food Services Department to send out requests for bid pricing to all vendors willing to serve the district. The proposal could have a provision that allows a bid to be continued without change the following year if the district decides to do so. When vendors receive a year-long commitment from a district through an annual bid system, they will usually offer better pricing.

Another option that could be more advantageous is to join with other districts to form a buying cooperative. This allows districts to get the better value that purchasing in quantity provides. When a vendor is offered a year-long commitment that is high in volume, the result can be very competitive prices. Multidistrict cooperatives usually go out to bid each year. Another way to achieve this would be for the district to join another district or cooperative mid-year by being added to the other entity's current bid. This would require getting permission from the other district or cooperative, and confirming with the vendor or vendors that the district is now a party to their existing bid arrangement.

FCMAT compared some of the district's current food service invoices to those of a purchasing cooperative of several small districts located three hours to the south. The multidistrict cooperative sought bids from several vendors. The comparison data show that the district is not receiving advantageous pricing from all of its vendors. FCMAT compared several items from the district's current year vendor invoices to what the multidistrict cooperative paid for like items during the same time period. The comparison data indicate that the district received good pricing from some vendors, but others charged an average of 20% more than what the cooperative paid. For example, the district pays \$0.2295 for a carton of milk, compared to the cooperative's \$0.185. On this item alone, the district would have saved \$40.05 on one delivery of 900 units, or approximately \$160.20 per delivery districtwide, if it were receiving the same pricing as the cooperative. These seemingly small savings can multiply quickly when applied to an entire program that uses food daily.

Other examples include tuna, for which the district is paying \$68.75 compared to the cooperative's price of \$48.00, and Gatorade, for which the district is paying \$13.73 compared to the cooperative's price of \$11.09. The potential savings on Gatorade alone is estimated at over \$1,300 per district delivery.

The district receives a reimbursement from the federal government for each qualifying meal it serves. The USDA holds this reimbursement, and the funds can be used only to buy approved commodity items. The district is currently using the state system and Gold Star Foods for commodity items. The district reportedly used only 70-75% of its available reimbursement dollars last year. One way many district use all of this money is by joining the Super-Coop, which is a food cooperative composed of many school districts throughout California, with Santa

Clarita Valley School District serving as the lead agency. Joining this cooperative would allow the district to get the same prices as the Santa Clarita School District for USDA commodity distribution and for products that have been processed from USDA commodities. More information can be obtained at <http://www.super-coop.org/>.

Recommendations

The district should:

1. Review all options for purchasing, and at a minimum start seeking bids from vendors annually.
2. Contact larger districts in the area to find out if there are any cooperatives or existing bid arrangements by larger districts that the district could join.
3. Contact the Super-Coop to see what advantages there could be to joining it.

Cash Handling

The Food Services Department has cash registers at each school that produce a register receipt for reconciliation. Each location is responsible for putting all the money collected in a secure money bag daily and storing it and the register receipts in a locked safe at each school. A food services staff member who is not part of the school's staff then removes the items from the safe and reconciles the money to the register tapes. Money is counted and reconciled with other staff present. After the money in each bag is reconciled it is consolidated and taken to each respective school's office and placed in another safe. An armored car courier service is notified that the bags are ready for pick up, and a courier then delivers them to the bank for deposit. The bank returns receipts for deposits so they can be recorded in the district's financial system.

At one of the schools the cash registers were operated with help from student workers; an adult staff member works next to the student worker. The registers have a number pad that students in line use to enter their ID number to receive their lunch. By viewing the register screen, the cashier can see if the students qualify for free or reduced-price meals, or if they have money in their accounts. Having student helpers assist with this task is a problem because they can see their fellow students' eligibility status in the meal program. This information needs to be kept confidential. Section 9(b)(6) of the National School Lunch Act (42 U.S.C. 1758(b)(6)) specifies the restrictions on the disclosure and use of information obtained from an application for free or reduced-price meals, as well as the criminal penalties for improper release of information. Only certain district staff should be able to view the information. In addition, students working at the registers could be subjected to peer pressure to give food away free to certain classmates.

The district lacks a detailed cash handling policy. The policy provided to FCMAT is more like a job description for the cashier that picks up the cash at all sites. A policy needs to spell out the procedures for handling cash from the time it is received from customers to the time it is deposited.

Recommendations

The district should:

1. Allow student helpers to serve food but not to work where they are able to view other students' meal eligibility.
2. Develop a detailed written cash handling policy.

Meal Counting and Collection Procedures

An October 2010 memo from The CDE Nutrition Services Division's field services unit states the following:

All School Food Authorities (SFAs) are required to have detailed written meal count and collection procedures, approved by the Nutrition Services Division (NSD), on file at their central office and at all sites serving lunch and/or breakfast.

FCMAT requested a copy of the district's meal count and collection procedures document and was told that it did not exist. This document is required by state and federal laws. Meal count and collection procedures may vary from location to location and may differ for breakfast and lunch, but all procedures must be documented. The CDE's outline of what this document should include is provided in Appendix E.

Recommendations

The district should:

1. Review the CDE's outline of items a meal count and collection procedures document should include, and create this document.
2. Ensure that each school has a copy of the procedures document on file.

Appendices

Appendix A

Cafeteria Budget Trends

Jefferson UHSD Cafeteria Budget Trends

	2014-15	2015-16	2016-17
	Unaudited Actuals	Unaudited Actuals	Adopted Budget
Beginning Fund Balance	133,917	11,425	4,951
Total Revenues	882,329	951,470	895,500
Revenue Change		69,141	-55,970
Revenue Change %		8%	-6%
Salaries	446,964	450,022	479,525
Benefits	150,958	164,900	168,544
Total Salaries and Benefits	597,922	614,922	648,069
Salaries/Benefits % of Revenue	68%	65%	72%
Food and Supplies	443,035	483,491	446,500
Food/Supplies % Revenue	50%	51%	50%
Services and Other Operating	13,864	9,532	12,325
Capital Outlay	-	-	-
Indirect Costs	-	-	-
Total Expenditures	1,054,822	1,107,944	1,106,894
Excess (Deficiency)	(172,493)	(156,474)	(211,394)
Interfund Transfer In	50,000	150,000	250,000
Ending Fund Balance	11,425	4,951	43,557
Enrollment	4,906	4,926	4,437.00
Free and Reduced Eligibility	36.3%	38.8%	36.0%

Notes:

Prior years' enrollment and free/reduced eligibility from CDE DataQuest reports.

Current year enrollment and free/reduced eligibility from 2016-2017 CALPADS.

Rounding used in calculations.

Appendix B

Meals Per Labor Hour and Year to Year Meal Comparison

Jefferson UHSD Meals per Labor Hour • October 2016: 19 days

Schools Meals	Jefferson	Oceana	Terra Nova	Thornton	Westmoor	District Totals
Breakfasts/Month	2,735	756	1762	58	3546	8,857
Breakfasts/Day	144	40	93	3	187	466
% F/R Participation	81%	72%	44%	79%	81%	72%
% Paid Participation	19%	28%	60%	21%	19%	28%
MEALS						
Lunches/Month	4354	1956	2507	48	5963	14,828
Lunches/Day	229	103	132	3	314	780
% F/R Participation	76%	65%	41%	75%	69%	66%
% Paid Participation	24%	35%	59%	25%	31%	34%
Total Meals	7,089	2,712	4,269	106	9,509	23,685
Total Meals/Day	373	143	225	6	500	1247
A la Carte \$/Day	14.86	129	46	0	24.7	215
A la Carte Equivalents	5	47	17	0	9	78
Total Meal Equivalents	379	190	241	6	509	1325
Student Labor Hours	3.5	0.75	1.75	-	1.75	8
LABOR HOURS	20.5	12	18	4	21	75.5
Meals per Labor (MPLH)	18	16	13	1	24	18
MPLH including student labor	16	15	12	1	22	16

Jefferson UHSD Prior Year Meal Comparison

	Oct 2014	Oct 2015	Oct 2016	Difference 2014 -2016
Daily Average	21 days	20 days	19 days	
Breakfasts/Day				
Jefferson	180	192	144	(36)
Oceana	50	53	40	(10)
Terra Nova	130	131	93	(37)
Thornton	23	20	3	(20)
Westmoor	203	201	187	(16)
Total Breakfasts/day	586	596	466	(120)
Lunches/Day				
Jefferson	338	343	229	(109)
Oceana	130	147	103	(27)
Terra Nova	169	155	132	(37)
Thornton	35	22	3	(32)
Westmoor	415	405	314	(101)
Total Lunches/day	1,087	1072	780	(307)
				-39%

Appendix C

Allowable Foods

QUICK REFERENCE CARDS

NON-CHARTER PUBLIC SCHOOLS

ELEMENTARY SCHOOL – FOOD RESTRICTIONS

References: *Education Code* sections 49430, 49431, 49431.7; *California Code of Regulations* sections 15575, 15577, 15578; *Code of Federal Regulations* sections 210.11, 220.12

An **elementary school** contains no grade higher than grade 6.

Effective from midnight to one-half hour after school.

Applies to ALL foods sold to students by any entity.

Sold means the exchange of food for money, coupons, vouchers, or order forms, when **any part** of the exchange occurs on a school campus.

Compliant foods:

1. MUST meet the following:
 - a. ≤ 35% calories from fat (except nuts, nut butters, seeds, reduced-fat cheese, dried fruit+nut/seed combo with no added fat/sugar, fruit, non-fried veggies), **and**
 - b. < 10% calories from saturated fat (except reduced-fat cheese, dried fruit+nut/seed combo with no added fat/sugar), **and**
 - c. ≤ 35% sugar by weight (except fruit*, non-fried veggies, dried fruit+nut/seed combo with no added fat/sugar), **and**
 - d. < 0.5 grams trans fat per serving (no exceptions), **and**
 - e. ≤ 200 milligrams sodium (no exceptions), **and**
 - f. ≤ 175 calories per item/container (no exceptions)

AND

2. MUST meet **ONE** of the following:
 - a. Fruit
 - b. Non-fried vegetable
 - c. Dairy food
 - d. Nuts, Seeds, Legumes, Eggs, Cheese (allowable protein foods)
 - e. Whole grain item**

If exempt food(s) combine with nonexempt food(s) or added fat/sugar they must meet ALL nutrient standards above.

* Dried blueberries cranberries, cherries, tropical fruit, chopped dates or figs that contain added sugar are exempt from fat and sugar standards. Canned fruit in 100% juice only.

** A whole grain item contains:

- a. The statement "Diets rich in whole grain foods... and low in total fat... may help reduce the risk of heart disease..." **or**
- b. A whole grain as the first ingredient, **or**
- c. A combination of whole grain ingredients comprising at least 51% of the total grain weight (manufacturer must verify), **or**
- d. At least 51% whole grain by weight.

Non-compliant foods may be sold from one-half hour after school through midnight.

CHECK YOUR DISTRICT'S WELLNESS POLICY FOR STRICTER RULES.

Groups or individuals selling foods/beverages to students must keep their own records as proof of compliance.

ELEMENTARY SCHOOL – BEVERAGE RESTRICTIONS

References: *Education Code* Section 49431.5, *California Code of Regulations* Section 15576, *Code of Federal Regulations* sections 210.10, 210.11, 220.8, 220.12

An **elementary school** contains no grade higher than grade 6.

Effective from midnight to one-half hour after school.

Applies to ALL beverages sold to students by any entity.

Sold means the exchange of beverages for money, coupons, vouchers, or order forms, when **any part** of the exchange occurs on a school campus.

A compliant beverage must be marketed or labeled as a fruit and/or vegetable juice, milk, non-dairy milk, or water AND meet all criteria under that specific category.

Compliant beverages:

1. Fruit or Vegetable juice:
 - a. ≥ 50% juice **and**
 - b. No added sweeteners
 - c. ≤ 8 fl. oz. serving size
2. Milk:
 - a. Cow's or goat's milk, **and**
 - b. 1% (unflavored), nonfat (flavored, unflavored), **and**
 - c. Contains Vitamins A & D, **and**
 - d. ≥ 25% of the calcium Daily Value per 8 fl. oz., **and**
 - e. ≤ 28 grams of total sugar per 8 fl. oz.
 - f. ≤ 8 fl. oz. serving size
3. Non-dairy milk:
 - a. Nutritionally equivalent to milk (see 7 *CFR* 210.10(d)(3), 220.8(i)(3) must contain per 8 fl. oz.:
 - ≥ 276 mg calcium
 - ≥ 8 g protein
 - ≥ 500 IU Vit A
 - ≥ 100 IU Vit D
 - ≥ 24 mg magnesium
 - ≥ 222 mg phosphorus
 - ≥ 349 mg potassium
 - ≥ 0.44 mg riboflavin
 - ≥ 1.1 mcg Vit B12, **and**
 - b. ≤ 28 grams of total sugar per 8 fl. oz., **and**
 - c. ≤ 5 grams fat per 8 fl. oz.
 - d. ≤ 8 fl. oz. serving size
4. Water:
 - a. No added sweeteners
 - b. No serving size

Non-compliant beverages may be sold from one-half hour after school through midnight.

ELEMENTARY SCHOOL – STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15500

Effective from midnight to one-half hour after school.

Applies to food and beverage sales by student organizations.

Student organization sales must meet **all** of the following:

1. Only **one food or beverage item** per sale.
2. The food or beverage item must be **pre-approved** by the **governing board** of the school district.
3. The sale must occur **after the lunch period** has ended.
4. The food or beverage item **cannot be prepared on campus**.
5. Each school is allowed **four sales** per year.
6. The food or beverage item cannot be the same item **sold in the food service program** at that school during the same school day.

QUICK REFERENCE CARDS

NON-CHARTER PUBLIC SCHOOLS**MIDDLE/HIGH SCHOOL – FOOD RESTRICTIONS**

References: *Education Code* sections 49430, 49431.2, 49431.7, *California Code of Regulations* sections 15575, 15577, 15578, *Code of Federal Regulations* sections 210.11, 220.12

A **middle/junior high** contains grades 7 or 8, 7 to 9, 7 to 10.

A **high school** contains any of grades 10 to 12.

Effective from midnight to one-half hour after school.

Applies to ALL foods sold to students by any entity.

Sold means the exchange of food for money, coupons, vouchers, or order forms, when **any part** of the exchange occurs on a school campus.

Compliant foods:

1. “**Snack**” food items must be:
 - a. ≤ 35% calories from fat (except nuts, nut butters, seeds, reduced-fat cheese, dried fruit+nut/seed combo), **and**
 - b. < 10% calories from saturated fat (except reduced-fat cheese, dried fruit+nut/seed combo), **and**
 - c. ≤ 35% sugar by weight (except fruit*, non-fried veggies, dried fruit+nut/seed combo), **and**
 - d. < 0.5 grams trans fat per serving (no exceptions), **and**
 - e. ≤ 200 milligrams sodium (no exceptions), **and**
 - f. ≤ 200 calories per item/container (no exceptions)

AND must meet one of the following

 - g. Be a fruit, vegetable, dairy, protein, or whole grain item** (or have one of these as the first ingredient), **or**
 - h. Be a combination food containing at least ¼ cup fruit or vegetable.
2. “**Entrée**” food items must be:
 - a. Meat/meat alternate and whole grain rich food; **or**
 - b. Meat/meat alternate and fruit or non-fried vegetable; **or**
 - c. Meat/meat alternate alone (cannot be yogurt, cheese, nuts, seeds, or meat snacks = these are considered a “snack”),

AND

An individual entrée sold by District/School Food Service the day of or the day after it appears on the reimbursable meal program menu must be:

- a. ≤ 400 calories, **and**
- b. ≤ 4 grams of fat per 100 calories
- c. < 0.5 grams trans fat per serving

An entrée sold by Food Service if not on the menu the day of or day after or any other entity (PTA, student organization, etc.) must be:

- a. ≤ 35% calories from fat, **and**
- b. < 10% calories from saturated fat, **and**
- c. ≤ 35% sugar by weight, **and**
- d. < 0.5 grams trans fat per serving, **and**
- e. ≤ 480 milligrams sodium, **and**
- f. ≤ 350 calories

AND must meet one of the following

- g. A fruit, vegetable, dairy, protein, or whole grain item (or have one of these as the first ingredient), **or**
- h. Be a combination food containing at least ¼ cup fruit or vegetable

If exempt food(s) combine with nonexempt food(s) or added fat/sugar they must meet ALL nutrient standards above.

* Dried blueberries cranberries, cherries, tropical fruit, chopped dates or figs that contain added sugar are exempt from fat and sugar standards. Canned fruit in 100% juice only.

** A whole grain item contains:

- a. The statement “Diets rich in whole grain foods... and low in total fat... may help reduce the risk of heart disease...” or
- b. A whole grain as the first ingredient, or
- c. A combination of whole grain ingredients comprising at least 51% of the total grain weight (manufacturer must verify), or
- d. At least 51% whole grain by weight.

Non-compliant foods may be sold from one-half hour after school through midnight.

CHECK YOUR DISTRICT’S WELLNESS POLICY FOR STRICTER RULES.

Groups or individuals selling foods/beverages to students must keep their own records as proof of compliance.

MIDDLE/HIGH SCHOOL – BEVERAGE RESTRICTIONS

References: *Education Code* Section 49431.5, *California Code of Regulations* Section 15576, *Code of Federal Regulations* sections 210.10, 210.11, 220.8, 220.12

A **middle/junior high** contains grades 7 or 8, 7 to 9, 7 to 10.

A **high school** contains any of grades 10 to 12.

Effective from midnight to one-half hour after school.

Applies to ALL beverages sold to students by any entity.

Sold means the exchange of food for money, coupons, vouchers, or order forms, when **any part** of the exchange occurs on a school campus.

A compliant beverage must be marketed or labeled as a fruit and/or vegetable juice, milk, non-dairy milk, water, or electrolyte replacement beverage/sports drink AND meet all criteria under that specific category.

Compliant beverages:

1. Fruit or Vegetable juice:
 - a. ≥ 50% juice **and**
 - b. No added sweeteners
 - c. ≤ 12 fl. oz. serving size
 2. Milk:
 - a. Cow’s or goat’s milk, **and**
 - b. 1% (unflavored), nonfat (flavored, unflavored), **and**
 - c. Contains Vitamins A & D, **and**
 - d. ≥ 25% of the calcium Daily Value per 8 fl. oz., **and**
 - e. ≤ 28 grams of total sugar per 8 fl. oz.
 - f. ≤ 12 fl. oz. serving size
 3. Non-dairy milk:
 - a. Nutritionally equivalent to milk (see 7 *CFR* 210.10(d)(3), 220.8(i)(3)), **and**
 - b. ≤ 28 grams of total sugar per 8 fl. oz., **and**
 - c. ≤ 5 grams fat per 8 fl. oz.
 - d. ≤ 12 fl. oz. serving size
 4. Water:
 - a. No added sweeteners
 - b. No serving size limit
 5. No-calorie Electrolyte Replacement Beverages (**NOT ALLOWED IN MIDDLE SCHOOLS**)
 - a. Water as first ingredient
 - b. ≤ 16.8 grams added sweetener/8 fl. oz.
 - c. ≤ 5 calories/8 fl. oz. (or ≤ 10 cal/20 fl. oz.)
 - d. 10-150 mg sodium/8 fl. oz.
 - e. 10-90 mg potassium/8 fl. oz.
 - f. No added caffeine
 - g. ≤ 20 fl. oz. serving size
 6. Low-calorie Electrolyte Replacement Beverages (**NOT ALLOWED IN MIDDLE SCHOOLS**)
 - a. Water as first ingredient
 - b. ≤ 16.8 grams added sweetener/8 fl. oz.
 - c. ≤ 40 calories/8 fl. oz.
 - d. 10-150 mg sodium/8 fl. oz.
 - e. 10-90 mg potassium/8 fl. oz.
 - f. No added caffeine
 - g. ≤ 12 fl. oz. serving size
- Non-compliant beverages may be sold from one-half hour after school through midnight.**

MIDDLE/HIGH SCHOOLS – STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15501

Effective from midnight to one-half hour after school.

Applies ONLY to food and beverage sales by student organizations.

1. Up to **three categories** of foods or beverages may be sold each day (e.g., chips, sandwiches, juices, etc.).
2. Food or beverage item(s) must be **pre-approved** by governing board of school district.
3. Only **one student organization** is allowed to sell each day.
4. Food(s) or beverage(s) **cannot be prepared on the campus.**
5. The food or beverage categories sold **cannot** be the same as the categories **sold in the food service program** at that school during the same school day.
6. In addition to one student organization sale each day, any and all **student organizations** may sell on the **same four designated days** per year. School administration may set these dates.

Appendix D

Wellness Policy Requirements Comparison 2004 and 2010

Local School Wellness Policies (LWP):
Comparison Chart of 2004 vs. 2010 Requirements

	2004 Requirements Child Nutrition WIC Reauthorization Act	2010 Requirements Healthy, Hunger-Free Kids Act
Overview	Directs local educational agencies (LEAs) to have a LWP in place for each school under its jurisdiction.	Strengthens LWPs and adds requirements for public participation, transparency, and implementation.
Elements of the Local School Wellness Policy	LWP to include, at a minimum, goals for nutrition education, physical activity, and other school-based activities to promote student wellness, as well as nutrition guidelines for all foods available on school campus.	In addition to the 2004 requirements, the LWP is also to include goals for nutrition promotion.
Stakeholder Involvement	LEAs are required to involve parents, students, and representatives of the school food authority, the school board, school administrators, and the public in the development of LWP.	In addition to the 2004 requirements, LEAs are now required to permit teachers of physical education and school health professionals to participate in the development of LWP.
Stakeholder Participation	The stakeholders named above are required to participate in the development of the LWP.	In addition to the 2004 requirements, LEAs are now required to permit all stakeholders named above and in 2004 to participate in the implementation and periodic review and update of LWP.
Local Discretion	LEAs can determine the specific policies appropriate for the schools under their jurisdiction, provided that those policies include all required elements specified in the Act.	Same as 2004 requirement.
Public Notification	None.	LEAs are required to inform and update the public (including parents, students, and others in the community) about the content and implementation of the LWP.
Measuring Implementation	LEAs are required to establish a plan for measuring implementation of the LWP.	LEAs are required to periodically measure and make available to the public an assessment on the implementation of LWP, including the extent to which schools are in compliance with LWP, the extent to which the LWP compares to model LWP, and a description of the progress made in attaining goals of LWP.
Local Designation	LEAs are required to establish a plan for measuring LWP implementation to include delegating one or more persons with the responsibility for ensuring LWP compliance.	LEAs are required to designate one or more LEA officials or school officials to ensure that each school complies with the LWP.

Created by US Department of Agriculture's Food and Nutrition Service (USDA FNS); US Department of Education (ED); and US Department of Health and Human Services, Centers for Disease Control and Prevention (CDC). (9/11; rev 6/17/13)

Appendix E

Meal Count and Collection Procedures

Eligibility

1. Do you use the State agency prototype of the Application for Free and Reduced-Price Meals or Milk? If not, is it compliant with all applicable State and federal regulations?
2. Do you use the State agency prototype of the Letter to Households? If not, is it compliant with all applicable State and federal regulations?
3. Do you use the State agency prototype of the Letter to Households – Direct Certification? If not, is it compliant with all applicable State and federal regulations?
4. Do you use the State agency prototype of the Public Media Release? If not, is it compliant with all applicable State and federal regulations?
5. Are you using the State agency income guidelines (eligibility scale) for the current year for free and reduced-price meals and free milk?
6. How are applications distributed to households? Is overt identification prevented in the distribution process?
7. When are applications distributed to households?
8. How are applications accepted from families applying for free or reduced-price meals or free milk? How is overt identification prevented in the application acceptance process?
9. How does your system change the eligibility category of students who no longer qualify for free or reduced-price to paid on the 31st operating day of the new school year?

Benefit Issuance

In order to have accurate claims and to ensure that students receive the benefits for which they have been approved, a system must be in place to accurately transfer eligibility information from application to medium of exchange (ticket, checklist, etc.). Many SFAs develop a roster from the currently approved free and reduced price applications. This is then used to issue benefits. If you use a roster, begin with question 1. If you issue benefits directly from the approved free and reduced price applications in the computer, skip question 1, a – c, and begin with 2.

1. Codes for each child's eligibility must be non-overt if access to rosters is available to anyone without "need to know". Effective dates of eligibility should be clearly indicated. Attach sample roster to your procedures.
 - a. Who creates and maintains rosters?
 - b. How are rosters created and coded for eligibility?
 - c. How do rosters indicate effective dates of eligibility?
2. Are copies of all benefit issuance documents (rosters) saved for three years plus the current year of operation as required?
3. How is the person who maintains the eligibility applications notified of the effective dates of changes, such as drops, transfers and new students approved for benefits?
4. How and when is site staff responsible for issuing benefits (tickets, tokens, IDs or coding checklists) notified of changes in eligibility?
5. How and when is site staff notified of changes due to verification?

Payment for Meals

1. Describe all the times, locations and methods of payment and prepayment that are accepted. How is prepayment, which helps avoid overt identification, advertised and encouraged?
2. Are charged meals allowed? If so, they must be offered to reduced-price eligible as well as to full price students. Charged meals must be claimed on the day served, not on the day paid. Describe your policy. Is a different meal offered for a charged meal?

Medium of Exchange Used (cash or any ticket, token, ID, name or number students exchange to obtain a meal). Describe the medium of exchange used. Attach a sample.

1. How is the medium of exchange non-overtly coded for free, reduced price and full price?
Prohibited – color coding by category or obvious identifiers such as F, R, RP, P or D. *Not Recommended* – single symbols or digits of any kind, e.g., A, B, C or 1, 2, 3. Attach a sample.
2. What safeguards are used to prevent your medium of exchange from being duplicated, used by an unauthorized person, or used twice in one meal service?
3. Who distributes the medium of exchange? Where and when? Common locations and times must be offered and not only in the serving lines.
4. What is your policy for the replacement of lost and/or stolen medium exchange?

5. How is medium of exchange collected at point of service? Include who collects and at what place in the serving line. Who insures that meal tickets, if used, are not used twice?
6. If cash for full price and reduced price meals is accepted in the serving line, how are those meals accounted for at point of service, i.e., with a tally, counter, cash register, or checklist?
7. How is overt identification avoided for reduced price eligible students who choose to pay in line?

Accuracy of Counts

You must accurately count all *reimbursable* meals at the point of service and ensure those counts are used for claiming purposes. All counts must be positive or actual counts. No meal counts claimed may be backed out of another count or be based on a pre-count.

1. Where is the point at which a meal is counted? Who counts the number of meals to claim?
2. What balance point (tray, plate, food item count) is used to compare with number of meals claimed? Claim cannot be based on the balance point.
3. What menu planning method is used? (Traditional Menu Planning, Enhanced Food Based Menu Planning, Nutrient Standard Menu Planning, Assisted Nutrient Standard Menu Planning, SHAPE NSMP, SHAPE RMP)
4. Do you have the mandatory meal service where all components are taken by children, or do you have offer versus serve? If you have offer versus serve, how many components do you require (3 or 4) to claim a reimbursable meal for lunch (also for three items for offer vs. serve breakfast if you offer breakfast)?
5. Who monitors the meals to ensure only reimbursable meals are claimed? Where is that person located in relation to the serving line? Explain what occurs when a student does not take a reimbursable meal.
6. Do you use portion adjusting for different age groups?
7. How do you account for adult and a la carte meals and ensure they are not claimed?
8. What is your policy on dropped and second meals? (Only one breakfast and/or one lunch) per student may be claimed for reimbursement each day.
9. How are earned student meals accounted for at point of service? Are the earned student meals claimed in the student's eligibility category?
10. How do you account for field trip meals at point of service?

11. How are visiting students' meals accounted for? There must be supporting documentation such as a roster from the school students are enrolled in if any meals are claimed as free or reduced price.
12. If you use any type of mechanical or automated system (i.e., a cash register or computerized ticket system), what is your plan if that system fails?
13. Is the same system used for breakfast as for lunch? If not, answer all of the questions that apply for breakfast as well.

Reports and Internal Controls

1. How are meal counts compiled by site? Attach a sample daily (sales) report and summary of daily meals summarized to monthly total to your procedures.
2. How do you ensure reports submitted by sites are accurate? How, when and by whom are edit checks of daily meal counts conducted?
3. Who counts the money daily? Who prepares the deposits? Who deposits the money and where is it deposited? Who reconciles the deposited money to the bank statement?
4. Who conducts required site monitoring and how often? To monitor effectively the monitor should be aware of all requirements and stay until the completion of the daily (sales) report.
5. What other methods do you use to ensure sites are in compliance (Staff Training)?

Appendix F

Study Agreement

Agreement No. 2017-006



**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
November 4, 2016**

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Jefferson Union High School District, hereinafter referred to as the district, mutually agree as follows:

1. BASIS OF AGREEMENT

The team provides a variety of services to local education agencies (LEAs). The district has requested that the team assign professionals to study specific aspects of the district's operations. These professionals may include staff of the team, county offices of education, the California State Department of Education, school districts, or private contractors. All work shall be performed in accordance with the terms and conditions of this agreement.

In keeping with the provisions of Assembly Bill 1200, the county superintendent will be notified of this agreement between the district and FCMAT and will receive a copy of the final report. The final report will also be published on the FCMAT website.

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

1. Examine the food service department's operational processes and procedures in areas including but not limited to food preparation, meal service, student participation, staffing, federal and state compliance, menu planning, purchasing, warehousing and food storage, inventory, and facilities, and make recommendations for improved efficiency, if any.
2. Evaluate the department's workflow and distribution of functions and make recommendations for improved efficiency, if any.
3. Review training and professional development programs for the department's employees and managers and make recommendations for improvements, if any.

Agreement No. 2017-006

B. Services and Products to be Provided

1. Orientation Meeting - The team will conduct an orientation session at the district to brief district management and supervisory personnel on the team's procedures and the purpose and schedule of the study.
2. On-site Review - The team will conduct an on-site review at the district office and at school sites if necessary.
3. Exit Meeting - The team will hold an exit meeting at the conclusion of the on-site review to inform the district of significant findings and recommendations to that point.
4. Exit Letter – Approximately 10 days after the exit meeting, the team will issue an exit letter briefly memorializing the topics discussed in the exit meeting.
5. Draft Report - Electronic copies of a preliminary draft report will be delivered to the district's administration for review and comment.
6. Final Report - Electronic copies of the final report will be delivered to the district's administration and to the county superintendent following completion of the review. Printed copies are available from FCMAT upon request.
7. Follow-Up Support – If requested by the district within six to 12 months after completion of the study, FCMAT will return to the district at no cost to assess the district's progress in implementing the recommendations included in the report. Progress in implementing the recommendations will be documented to the district in a FCMAT management letter. FCMAT will work with the district on a mutually convenient time to return for follow-up support that is no sooner than eight months and no later than 18 months after completion of the study.

3. PROJECT PERSONNEL

The FCMAT study team may also include:

- | | |
|----------------------------|-------------------------|
| <i>A. To be determined</i> | <i>FCMAT Staff</i> |
| <i>B. To be determined</i> | <i>FCMAT Consultant</i> |
| <i>C. To be determined</i> | <i>FCMAT Consultant</i> |

4. PROJECT COSTS

The cost for studies requested pursuant to Education Code (EC) 42127.8(d)(1) shall be as follows:

- A. \$500 per day for each staff member while on site, conducting fieldwork at other locations, presenting reports and participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate for all work performed.

Agreement No. 2017-006

- B. All out-of-pocket expenses, including travel, meals and lodging.
- C. The district will be invoiced at actual costs, with 50% of the estimated cost due following the completion of the on-site review and the remaining amount due upon the district's acceptance of the final report.

Based on the elements noted in section 2A, the total not-to-exceed cost of the study will be \$18,600.

Fund: 01/0100/01000/3700/5800/090

- D. Any change to the scope will affect the estimate of total cost.

Payments for FCMAT's services are payable to Kern County Superintendent of Schools - Administrative Agent located at 1300 17th Street, City Centre, Bakersfield, CA 93301.

5. **RESPONSIBILITIES OF THE DISTRICT**

- A. The district will provide office and conference room space during on-site reviews.
- B. The district will provide the following if requested:
 1. Policies, regulations and prior reports that address the study scope.
 2. Current or proposed organizational charts.
 3. Current and two prior years' audit reports.
 4. Any documents requested on a supplemental list. Documents requested on the supplemental list should be provided to FCMAT only in electronic format; if only hard copies are available, they should be scanned by the district and sent to FCMAT in electronic format.
 5. Documents should be provided in advance of fieldwork; any delay in the receipt of the requested documents may affect the start date and/or completion date of the project. Upon approval of the signed study agreement, access will be provided to FCMAT's online SharePoint document repository, where the district will upload all requested documents.
- C. The district's administration will review a preliminary draft copy of the report resulting from the study. Any comments regarding the accuracy of the data presented in the report or the practicability of the recommendations will be reviewed with the team prior to completion of the final report.

Pursuant to EC 45125.1(c), representatives of FCMAT will have limited contact with pupils. The district shall take appropriate steps to comply with EC 45125.1(c).

Agreement No. 2017-006

6. PROJECT SCHEDULE

The following schedule outlines the planned completion dates for different phases of the study and will be established upon the receipt of a signed study agreement:

Orientation:	to be determined
Staff Interviews:	to be determined
Exit Meeting:	to be determined
Draft Report Submitted:	to be determined
Final Report Submitted:	to be determined
Board Presentation:	to be determined, if requested
Follow-Up Support:	if requested

7. COMMENCEMENT, TERMINATION AND COMPLETION OF WORK

FCMAT will begin work as soon as it has assembled an available and appropriate study team consisting of FCMAT staff and independent consultants, taking into consideration other jobs FCMAT has previously undertaken and assignments from the state. The team will work expeditiously to complete its work and deliver its report, subject to the cooperation of the district and any other parties from which, in the team's judgment, it must obtain information. Once the team has completed its fieldwork, it will proceed to prepare a preliminary draft report and a final report. Prior to completion of field work, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report and the district will be responsible for the full costs. The district understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once fieldwork has been completed, and the district shall not request that it do so.

8. INDEPENDENT CONTRACTOR

FCMAT is an independent contractor and is not an employee or engaged in any manner with the district. The manner in which FCMAT's services are rendered shall be within its sole control and discretion. FCMAT representatives are not authorized to speak for, represent, or obligate the district in any manner without prior express written authorization from an officer of the district.

9. INSURANCE

During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile

Agreement No. 2017-006

liability insurance in the amount required under California state law, and workers compensation as required under California state law. FCMAT shall provide certificates of insurance, with Jefferson Union High School District named as additional insured, indicating applicable insurance coverages upon request.

10. HOLD HARMLESS

FCMAT shall hold the district, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement. Conversely, the district shall hold FCMAT, its board, officers, agents and employees harmless from all suits, claims and liabilities resulting from negligent acts or omissions of its board, officers, agents and employees undertaken under this agreement.

11. CONTACT PERSON

Name: Tina Van Raaphorst, Associate Superintendent, Business Services
 Telephone: (650) 550-7954
 Fax: (650) 550-7888
 E-mail: tvanr@juhsd.net



Tina Van Raaphorst
 Associate Superintendent, Business Services
 Jefferson Union High School District



Date



Michael H. Fine
 Chief Administrative Officer
 Fiscal Crisis and Management Assistance Team

November 4, 2016

Date

