



CSIS California School Information Services

Buena Park School District

Food Service Review

December 15, 2017



Michael H. Fine
Chief Executive Officer





December 15, 2017

Greg Magnuson, Superintendent
Buena Park School District
6885 Orangethorpe Avenue
Buena Park, CA 90620

Dear Superintendent Magnuson,

In December 2016, the Buena Park 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 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 provide 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 Buena Park School District, and extends thanks to all the staff for their assistance during fieldwork.

Sincerely,

Michael H. Fine
Chief Executive Officer

FCMAT

Michael H. Fine, Chief Executive Officer

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About FCMAT

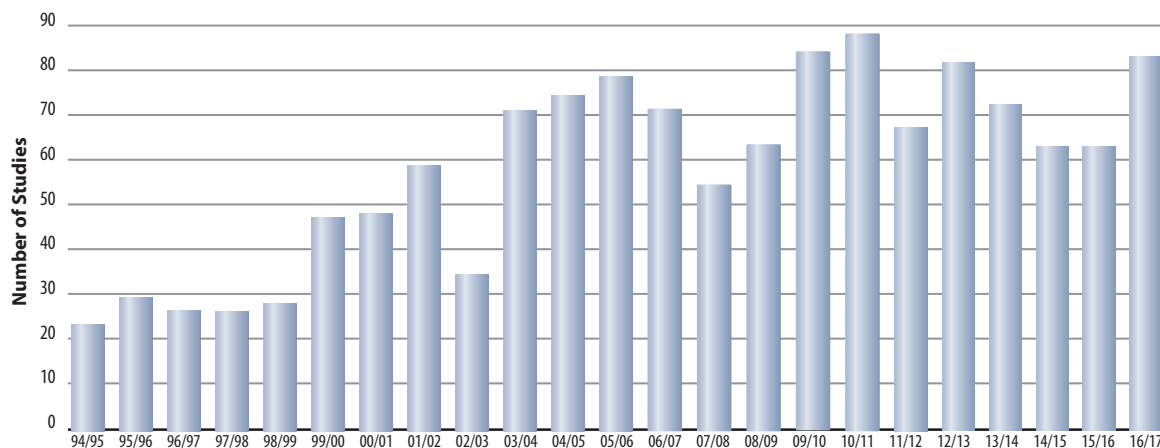
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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 Michael H. Fine, Chief Executive Officer, with funding derived through appropriations in the state budget and a modest fee schedule for charges to requesting agencies.

Introduction

Background

Buena Park School District is a K-8 school district located in Orange County, California. The district has six (K-6) elementary schools and one (7-8) junior high school.

The district's enrollment in the 2016-17 school year was 4,784, and its unduplicated free and reduced price meals (FRPM) percentage was 73% according to the California Department of Education CALPADS report. The school with the highest FRPM percentage is Gilbert Elementary at 93% and the lowest is Emery Elementary at 42%. Enrollment has dropped by about 85 students from 2015-16 and has been on a slow decline for several years, with a peak of 6,386 in 2001-02.

The district participates in the National School Breakfast and Lunch programs as well as the after-school snack program at all schools. It also provides prepackaged meals to a local private school, Rossier Park.

Study Team

The study team was composed of the following members:

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

Study and Report Guidelines

In January 2017, the Buena Park School District requested that FCMAT review its Child Nutrition Services department. FCMAT visited the district on May 8-9, 2017 to conduct interviews, collect data and review documents. District staff continued to provide requested documents through July 2017. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Budget
- Staffing and Meals per Labor Hour
- Meal Program and Planning
- Meal Service

- Leadership and Staff Training
- Wellness Policy
- Free and Reduced Application Process
- Paid Meal Prices and Lunch Equity Regulation
- Free Breakfast and Provision 2
- Student Meal Charges
- Personnel Activity Reports
- Facilities
- 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

A director located at the district office leads the Child Nutrition Services department. Additional staff at the district office include an account clerk (this position is currently vacant), typist clerk and part-time warehouse clerk. The district has six full-time cook/managers, one at each school except Pendleton. Corey produces meals for Corey, Pendleton and a private school. An additional 39 cafeteria workers are employed at the school sites. A labor analysis was performed and is discussed in detail in this report. Staffing seems to be at appropriate levels.

The department serves breakfast, lunch and after-school snacks on all campuses as well as breakfast and lunch to a local private school, Rossier Park. The district serves free breakfast to all students on all campuses per Provision 2 federal school meal regulations. Federal and state meal reimbursements are paid according to a base year count of the percentage of free, reduced and paid students. Thus, the district waives the cost of breakfast for reduced and paid students.

The cafeteria budget has been deficit spending to reduce the cash balance to allowable reserve levels. The regulations only allow cafeteria cash balances to be the equivalent of three months' expenses. The projected cash balance for the current year is expected to be at an appropriate level. The department will need to be diligent to control future expenditures to slow the deficit spending and maintain desired reserves.

In school food service, best practice standards are at least 30 meals per labor hour (MPLH). The district met and exceeded these standards at all but one site, Beatty Elementary, which was 29 MPLH. Emery was 30 MPLH and all others were between 34-38 MPLH. These results indicate that the site staffing is appropriate for the number of meals served.

There is a need for increased communication between the director and her staff. Most Child Nutrition staff members interviewed expressed concerns about a lack of communication with the director. Many indicated that the director does not visit the sites as frequently as needed and feel this lack of communication and involvement has caused morale problems. Staff stated she no longer holds the monthly meetings where they could give input. The previously held meetings were infrequent and inconsistent, with many meetings being cancelled or rescheduled.

Some of the site kitchens have adequate space and equipment for the items served. However, the junior high has very little preparation space and has insufficient refrigeration for its needs. Gilbert Elementary has a very small, crowded kitchen for the number of meals served and requires upgraded refrigeration equipment. Pendleton Elementary has no walk-in refrigeration.

All sites use two-compartment sinks. This necessitates extra labor as the staff must wash and rinse and then drain a sink so that sanitizer can be added to a fresh batch of water. New three-compartment sinks that would fit into the same space as the two-compartment sinks should be evaluated. Each kitchen should have a hand-washing sink within the main kitchen to facilitate frequent hand washing during meal preparation and service. Currently, many kitchens only have hand-washing sinks in adjacent bathrooms.

Child Nutrition Services had a California Department of Education (CDE) administrative review of its department in March 2015 and passed it with just a few minor findings, which were appropriately corrected and the review was closed. These reviews are conducted every three years as mandated by the USDA.

Findings and Recommendations

Budget

Ideally, a district food service department should be self-sustaining. Revenue should fund department expenses, including indirect costs, with appropriate reserves maintained. A review of the district's cafeteria budget from 2014-15 through 2016-17 shows expenses exceeding revenues each year, which is known as deficit spending; however, the fund still has strong reserves. According to the district, the deficit spending has been intentional to bring cash reserves down to allowable levels, which are three months' worth of expenditures. A spreadsheet comparing these budgets is in Appendix A.

Indirect costs are charged to the fund. Indirect costs consist of business and administrative expenses such as budget, payroll, accounts payable, human resources, and data processing services provided to all programs.

Food and labor are the major costs in a food service department. Ideally, each of these items should be 40%-45% of revenue. In reviewing current and prior two years' budgets, food costs have been in the 45%-47% range, which is somewhat high but not alarming if the labor costs were lower than the current nearly 50%. The director stated that more expensive foods such as blueberries and jicama have been used as part of the spend-down plan. There also appears to be a great deal of waste especially in the salad bar items because of the large variety and because the salad bars are optional. Another factor in waste is that students are given a full tray in the line with an entrée and a vegetable that they must take whether they want it or not. This will be discussed in more detail in the Meal Program and Planning section but could be part of the reason that food costs are higher than ideal.

Labor costs, consisting of salaries and benefits, were 48%-49% in the past two years and are projected to be 50% of revenue in the 2017-18 school year. According to the food service director, site staffing levels have been consistent in recent years. Though labor costs are on the high side, the meals per labor hour (MPLH) analysis does not show overstaffing; in fact, it indicates a high degree of efficiency for the number of meals served. The MPLH does not include the director or non-site staff and there is no similar standard for these positions, but based on the FCMAT study team's experience the number and type of administrative hours is appropriate. The high labor expense may just be a result of increasing salary and benefit costs in the district. Many employees in the department have worked for the district for 20-30 years and are at the top of their pay scale.

Revenue in 2015-16 was about 5% higher than in 2014-15 and is projected to be about the same in 2016-17 as in 2015-16. The district stated that its meal program reimbursements may be lower than projected in 2016-17 because the state has received less revenue than expected. This means the state may reduce the total funding provided to local educational agencies for the meal program, so the district's expenses may be higher than planned.

A review of meals served in 2014-15 through 2016-17 shows lunch participation dropping slightly at 2%-3% over this period. Breakfast counts have improved since the district began offering free breakfast to all students. The program began in the 2014-15 school year, and in October 2015 counts had gone up by an impressive 28%. October 2016 breakfasts were about 9% less than the peak in 2015. The 2015-16 revenue was about 5% higher than the prior year.

Some of this can be attributed to the federal and state reimbursement rate increases, but breakfast increases likely contributed.

With an overall eligibility of 73% for free and reduced price meals (FRPM), the district is subsidizing the remaining 27% of student paid meals at breakfast and does not charge the allowable \$.40 cost to students qualifying for reduced meals. This is because the district participates in Provision 2 of Section 11(a)(1) of the National School Lunch Act, which allows schools to establish initial claiming percentages and to serve all meals at no charge for a four-year period. Schools must offer meals to all participating children at no charge during this period. This seems to be a positive change, and the district should monitor trends to ensure it continues to have a positive effect on the budget.

Another factor contributing to the overall decline in revenue may be the low lunch price for paid students (\$2). This is extremely low and below the paid lunch equity requirement of \$2.80. The district has a waiver on this requirement because it previously had excessive cash reserves and felt the higher price would add to this problem. The district should do a study on the effects of this decision to their revenue and monitor it now that they have reached its reserve limits.

Districts throughout the country have experienced declining participation since the implementation of stricter nutritional regulations over the past five years. It takes a concerted effort to find ways to enhance participation. As will be discussed in the Meal Planning and Program section, some modifications in the breakfast and lunch menus may help entice students to participate, especially in entrée choices at elementary schools.

Overall the state of the cafeteria budget is not a problem for the district if care is taken to monitor revenue and spending trends and make adjustments as needed. The food service director needs to pay close attention to the budget and find ways to improve participation to maintain a good revenue stream, so that deficit spending does not continue. The focus should be on increasing participation and thus revenue and reducing food waste. Otherwise the remaining reserves may be depleted and the department may not be able to sustain itself and will need to depend on contributions from the unrestricted general fund.

Recommendations

The district should:

1. Regularly monitor the budget to ensure that revenue and expenses coincide with expectations.
2. Concentrate on ways to increase participation and reduce waste.
3. Periodically analyze the pros and cons of both the free breakfast and low lunch prices.

Staffing and Meals per Labor Hour

A director located at the district office leads the Child Nutrition Services department. Additional staff at the district office include an account clerk, typist clerk (position is currently vacant) and part-time warehouse clerk. The district has six full-time cook/managers, one at every school except Pendleton. Corey produces meals for Corey, Pendleton and a private school. An additional 39 cafeteria workers are employed at the school sites.

Because labor is generally one of the largest expenses in a food service operation, it is important to ensure staffing ratios are adequate to meet department needs without being excessive.

The district consists of six (K-6) elementary schools and one (7-8) junior high school. Enrollment for the 2016-17 school year was 4,784 and the unduplicated free and reduced price meal (FRPM) eligibility was 73% according to the California Department of Education CALPADS report. The district participates in the National School Breakfast and Lunch programs as well as the after-school snack program at all schools.

MPLH is an industry standard used to measure staff efficiency and help determine the appropriate staffing levels in a food service operation. Only labor hours for food preparation, cleanup and meal service are generally included in this calculation because it is a measure of the labor used to prepare and serve the meals at sites. Management and clerical time is not included. The warehouse delivery person takes prepared meals from Corey to Pendleton daily and these hours could be counted as labor hours in this study but since the MPLH is so positive, adding his time would not affect the overall efficiency of the schools involved.

An MPLH analysis was performed for district schools and is attached as Appendix B to this report. The analysis was conducted using meals served in October 2016. Because October is the cutoff for prior-year FRPM eligibility and new application processing, October generally provides an accurate snapshot of participation in the program.

MPLH can be calculated in many ways, but consistency is important no matter the method. Breakfast is sometimes counted as a fraction of a meal equivalent because it is simpler to prepare and serve. District breakfasts include many ready-to-serve items, but some are also cooked. Therefore, these meals were given full weight in this analysis. A la carte sales are converted into a meal equivalency and added to meal totals. This is done by dividing the total dollar value of the a la carte sales by an average of breakfast and lunch prices. Only the junior high school sells a la carte items so it is the only one with an a la carte meal equivalent. Since breakfast is free, the total sales were divided by just the lunch price of \$2. The district serves breakfast, lunch and after-school snacks at all schools, and these were included in the meal analysis. The snacks were counted only as one-third of a meal equivalent because they consist of only two items that are prepackaged and require little labor.

As was stated in the budget section, lunch participation has dropped slightly (2%-3%). Breakfast counts have improved since the district began offering free breakfast to all students and are up by about 13% since 2014-15. These findings are especially good considering the district has experienced a drop in both enrollment and eligibility. CDE records indicate that district enrollment has been on a gradual decline for many years, with nearly 1,200 fewer students than 10 years ago, and 500 fewer since 2012-13. The FRPM eligibility in 2014-15 was 80% according to CALPADS data. In the past two years the eligibility has been 73%.

Despite the drop in enrollment, results of this analysis show that the district is doing very well with staff efficiency in its meal service operations.

In school food service, best practice standards are 30 MPLH. The district met and exceeded these standards at all but one site, Beatty Elementary, which had 29 MPLH and is still good. Emery was 30 MPLH and all others were between 34-38 MPLH. Corey Elementary prepares food for its students as well as for Pendleton Elementary and a local private school, Rossier Park. These meal counts and staff hours were combined and resulted in the highest MPLH at 38. Food service staff at Pendleton prepare salad bar items and serve the meals to students. District staff prepare and deliver prepackaged meals to Rossier. Rossier staff serve the meals to their students and complete student rosters for meals served. Buena Park reports Rossier meals along with its own on state reimbursement claims to the Child Nutrition Information and Payment System, or CNIPS.

These results indicate that the site staffing is appropriate for the number of meals served. The kitchens seem efficient and the meal lines, though long, move quickly and smoothly at all sites. Site staff at Corey and Pendleton stated frustration about a recent reduction of hours at Pendleton. The director indicated the hours were removed because breakfast counts are too low to justify the previous hours. With a combined MPLH of 38 for Corey, Pendleton and Rossier, the department could justify adding back the hours that had been reduced at Pendleton. Perhaps the previous hours could be utilized for additional prep time so menus could be expanded for more student choices at lunch.

Significant reductions in meal counts could change the MPLH levels and thus justification for current staffing levels. The director and site staff need to have regular conversations about meal counts and ideas to increase participation so that staffing levels remain appropriate.

The director stated that she uses her own method of calculating MPLH, which was provided to the study team. This method did not include a la carte revenue or snacks. The MPLH for most sites were considerably lower than those in the analysis done by the study team. Corey, Rossier and Pendleton were counted as separate sites in the director's analysis, which is not a legitimate measure of productivity since Corey does most of the prep for the other sites. The director did not state the MPLH goals in the materials provided to the study team.

It is important for the director to regularly monitor MPLH to ensure that staffing ratios are maintained at appropriate levels, especially because of the high labor expense and because the fund has been in a spend-down mode to reduce reserves to desired levels. Without careful monitoring of expenses and maintaining good participation (thus revenue), the fund could eventually require a contribution from the unrestricted general fund.

Site staff stated that they rarely see the director at their schools. The department would benefit from regular visits by the director to observe production and meal service and talk to site staff about concerns. Frequently observing meal lines and talking to students and observing food waste can give the director knowledge about student preferences. The director stated that she has done student surveys and food tastings, which are beneficial too, but regular observations and discussions can reveal more information about customer satisfaction.

Recommendations

The district should:

1. Regularly analyze staffing by site observations as well as MPLH reports.
Consider using the industry standard method of analysis in the future for a more accurate analysis. Have an MPLH goal and share that with site staff.

2. Regularly review labor costs and revenue.
3. Continually work to find ways to improve student satisfaction and participation. Have the director regularly visit sites to meet with staff and observe meal lines to better understand which foods are popular and which are not.

Meal Program and Planning

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). During federal reauthorization in 2010 regulations were updated, resulting in the most comprehensive changes to the program in 15 years. Initial guidelines became effective in the 2012-13 school year and have continued to become stricter.

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 on this:

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

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

The new regulations seek to increase the availability of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk on school menus; reduce the levels of sodium, saturated fat and trans fats in school meals; and meet the nutritional needs of school children within specified calorie requirements. The intent is to provide meals that are high in nutrients and low in calories.

Menu Planning

Districts must offer a wide variety of vegetables, including specified weekly amounts of vegetable subgroups. These subgroups include dark green, red/orange, starchy, and legumes. While this is nutritionally sound, it complicates menu planning and to some extent, student acceptance. A full cup of fruit must be offered at breakfast for all grade levels. Half a cup of fruit and three-fourths of a cup of vegetables must be offered to K-8 students at lunch, and one cup of both fruit and vegetables must be offered during that meal for high-school students. Students must take at least a half cup of fruit *or* vegetable with both breakfast and lunch regardless of whether they want it.

Districts have experienced an increase in waste because of this requirement. In addition to the food component requirements, menus must meet specific nutritional guidelines such as sodium and fat limits and minimum and maximum calorie levels for the various age groups. Regulations include the type of milk (fat free and low fat) that must be offered as well as not being able to count “hidden” fruits or vegetables baked into other items against the fruit/vegetable requirement. Fruits pureed into smoothies are exempt from this restriction.

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 foods. At least five items must be offered at lunch and four at breakfast, but students are required to take only three items at each meal. One item is required to be a fruit or vegetable, but aside from that, students may choose whatever they want. Offer versus serve is required by regulations at the high school level and is highly encouraged at other grade levels.

The district's elementary school menus seem to be nutritionally adequate and acceptable under the new NSLP regulations. All menus passed the criteria for the NSLP certification for having the proper items and serving sizes available daily at the last CDE Administrative Review in 2015.

The district offers a posted menu to elementary students for both lunch and breakfast. It lists the basic menu items offered on the serving line but there does not seem to be a written menu for the salad bar items. A variety of fresh fruits and vegetables is available, including an extensive salad bar that is optional to students since in the salad bar is located in the cafeteria seating area and is after the students have already gone through the serving line. Staff interviewed indicated that the salad bar must include a mixed green salad, cucumbers and carrots daily – the other items are up to the site leads. Approximately 10 items (fruit and vegetables) are offered daily, but this is not part of a written menu or daily rotation.

FCMAT was not provided with a daily menu for the junior high school. Students receive a brochure that shows possible options, but the study team could not determine how the staff or students would know what was available on a particular day. It is dated "school year 2015-2016." The director stated that this flyer is the only written menu for the junior high school. The flyer lists more than 20 possible entrees plus "many more." It lists 18 fruits and vegetable possibilities. The site manager selects what to serve from these lists without creating a formal menu containing entrees and side dishes.

Management should control the menu writing function to ensure compliance with regulations and to control costs. The director should seek input from sites because they are more familiar with student preferences. Many staff members expressed frustration because the director does not ask for their input. A written menu is also needed for salad bars, including all items offered. Salad bar menus could be written as a weekly or daily rotation cycle, which can change with seasonal availability.

The district does not do a full nutritional analysis, but staff indicated that software had been purchased and would be implemented over the summer. All menus must be written to meet USDA and California regulations for components and for calories, sodium, percentage of saturated fat, and trans fats. FCMAT was not given current documentation showing that these requirements are met.

The director stated that the department passed the administrative review two years ago and the Nutrition Services Division of the CDE accepted the district's menus and analysis. The complete report was requested but not provided for FCMAT to review although the study team saw evidence that the review was closed, which means the district completed all requirements and corrective actions. However, the current written menus are not complete nor is there an analysis, so they do not appear to be in compliance at this time.

Staff indicated that they lack standardized recipes. While the products are heat and serve, recipes are required to show that the proper Hazardous Analysis Critical Control Point (HACCP) steps are being taken and to give heating and cooling instructions. HACCP is a mandated method to show proper food handling. A software program that is linked to the menu could easily generate these recipes. The district recently purchased a nutrient analysis program to assist in this process but it has not yet been implemented.

Recommendations

The district should:

1. Have the director write or make available complete breakfast and lunch menus with all items to be offered each day, including salad bar items. Provide the menus to the cook/managers at all schools. Solicit staff input in this process.
2. Complete the nutritional analysis on the newly purchased software to ensure that each monthly menu meets the nutritional criteria.
3. Write recipes that include HACCP procedures for all products served.

Cycle Menu

The districtwide menu does not appear to be written on a cycle basis. A cycle menu is one in which the same items appear in the same sequence. A cycle can be one week, two weeks, three weeks, or four weeks. The only consistency seems to be pizza offered every Friday.

Establishing a more routine cycle generates trust with the students and decreases the need to order and store more products. For example, a student will know that every Monday or every other Monday, one of his/her favorite items will be offered. Even though the FRPM population of the district is high, not all FRPM students will necessarily eat each meal. To increase participation, many districts start with the top 10 most popular items and then add to that list to get a cycle established. Menus do have to be changed to adapt to the use of commodity items or good sales on products, but those can generally be put into the established cycle in the following month. Commodity items are foods that USDA makes available to each district for only a small fee. Each district is given a dollar allowance with which to purchase these foods.

Because the menus on some days are more popular than others, the cycle menu assists site cook/managers in establishing a product history from which it is easier to order the correct quantities in advance. This also assists the warehouse and purchasing staff because the flow of product is more predictable. The cycle can be changed quarterly to add less popular items for variety and to take advantage of seasonal favorites.

Nearly every site cook/manager stated that the menu is not available to them until the last minute. This makes it extremely difficult to plan and order product. Each site cook/manager orders food directly from the vendors or from the district warehouse. The cook/managers stated it is common to receive the menu within days of starting the new month. The menu and order guides should be sent out at least two weeks in advance. Even longer would be helpful for everything except produce. Since produce prices vary widely from week to week, these items can have a shorter lead time.

The director also sends order guides out weekly that notify the cook/managers which products will be available to order. This allows the director some control over what is purchased. However, the cook/managers indicated that this order guide is also delivered too late and stated that the vendor is often out of product by the time they order. The director indicated that getting the order guide too early results in cook/managers often ordering too much or too far in advance, but the director could monitor that issue by reviewing their online orders and advising them accordingly.

Production Sheets

A cycle menu can assist in writing production sheets. A production sheet is a USDA mandated form that is filled out at each site to show how much food was available to be offered, how much was taken and how much left over. This shows the USDA that every child was offered the appropriate amount of food, whether they chose to take it or not.

Each cook/manager is responsible for writing production sheets daily. Some have a template with a few standard items on it, like carrots, cucumbers and ranch dressing, but many have completely blank forms. Considerable time could be saved if the district Child Nutrition office generated production sheets, since all elementary sites offer the same foods daily. This could include a reference sheet with all amounts to be used, manufacturers' codes, and factor numbers listed that cook/managers could simply copy.

Cooks/managers have more complete production sheets for breakfast but still must write in items that should be automatically included. Most menu planning software has a module that generates production sheets from the menu.

The director needs to take responsibility for creating the production sheets, order guides and menus for the staff to ensure compliance and consistency. This needs to be done no less than two weeks in advance.

The cook/managers seem to have too much leeway on what to serve. Purchase of the salad bar items seems to be an individual choice. Since the cook/managers order directly from the produce company, they can order any item they desire. This includes fruits such as blackberries and blueberries that are expensive. It was unclear if the director gives any direction on these items regarding cost. With future budget concerns, this may be an area that the director should more closely control.

Recommendations

The district should:

1. Establish cycle menus for more efficiency, ease of ordering and best use of storage.
2. Provide the monthly menu, production records and order guides on a timely basis to the sites so they can plan their orders.
3. Generate production sheets for all sites from the district Child Nutrition office.
4. Purchase and implement a software program to generate production sheets automatically.
5. Establish a method or guidelines for the direct purchase of expensive items.

Meal Service

Student Participation and Choice

The menu provided to FCMAT only gave the students a choice of one entrée for lunch. The study team was told that there is also a vegetarian option, but it was not available for all students to choose as they came through the serving line. Having more choices available can help increase participation.

The menu as written for the months of April and May 2017 relied heavily on food that only needed to be thawed, heated and served. This method works well since the kitchens serve many meals with only convection ovens as heating equipment. It also allows each kitchen to order and receive its own product with minimal planning and product on hand.

However, it would be very simple to offer a second entrée daily to capture the students who do not like the main entrée. With a cycle menu in which the same two options were offered together, the cook/manager would quickly learn how to predict how many of each entrée to prepare. The cafeteria could also offer the same prepackaged entrée all week (such as a burrito), or if one entrée is a simple cold choice, such as yogurt, cheese and crackers or cut up ham and cheese with crackers, there is minimal waste. These foods can be taken from the refrigerator as needed. The production sheets should be specifically used for this purpose – to determine what the most popular items are and to prepare that amount accordingly.

Multiple choices are offered at breakfast. However, interviews indicated that the cook/managers have been told to limit the number of each food item available. . The same choices are not available for the last students in line as for the first. While it often happens that the cook/manager may not have heated enough of the hot entrée, it did not make sense why any student could not have a cold cereal if they requested it. The reason given was that the cook/manager wanted to use up the entire case of frozen product so that it didn't have to be stored. However, with a cycle menu, any open cases would be used the next time that product was in the cycle, so refrigerated space would not be taken up for months at a time.

If it is determined that there are foods being held in refrigeration but there is not enough for all sites, a special menu can be written with "Cook's Choice" days. This is typically done at the end of the year and even before major holidays to reduce the amount of product that is stored. Each cook/manager would send a report of how many portions of product they have and the director could have it moved so that one site would have enough for an entire day's service at that school.

Offer versus Serve

The serving line at the elementary schools consist of the hot food service, with the point of sale (POS) computer placed next and then a salad bar further on in the multipurpose room. In many cases the milk cooler is also placed after the POS. USDA mandates that a "checker" verifies that a complete reimbursable meal is taken by each student. The student must take either a fruit or a vegetable or a combination of both to equal the required amount. At Buena Park, a vegetable is offered on the hot food line so that the student can be verified at the POS computer. The salad bar is then essentially an extra even though the foods there could be used as part of the reimbursable meal.

All students are served the vegetable to meet requirements. This could be a waste of food if students prefer what is in the salad bar. Typically, most students would rather have cold salad bar items than hot vegetables, but a plate waste study should be done. Forcing students to take

predetermined items and not allowing choice goes against the purpose of offer versus serve, which is to let students choose what they want, and can make the lunch program less desirable to some students. An easy change would be to have a bowl of whole fresh fruit and some packaged carrot sticks on the main serving line, before the cashier checkpoint, so the students could choose to have that instead of the cooked vegetable.

The director stated that the practice of forcing students to take a preset reimbursable meal was established because some staff have difficulty determining what constitutes a reimbursable meal. This is not a good reason for implementing this policy. Training staff in what constitutes a reimbursable meal and holding them accountable for implementation is a management responsibility, and sometimes takes frequent reinforcement. CDE reviewers often ask employees to describe the components of a reimbursable meal during an administrative review.

The POS could be moved to the very end of the serving line, past the salad bar and milk cooler. In this way, all the foods offered would be eligible to be considered for the reimbursable lunch and waste would be reduced. There may be other reasons to keep the POS computer in the kitchen serving line such as lack of space in the cafeteria or lack of data connectivity, but they should be evaluated and compared with the cost of excess food.

Recommendations

The district should:

1. Offer more than one entrée for lunch – either hot or cold.
2. Add a fruit bowl and packaged carrots to the serving line so students can have a choice in their fruit/vegetable selection before passing the checkpoint.
3. Train staff in the components of a reimbursable meal. Reinforce this frequently.
4. Conduct a plate waste study to see if hot vegetables are consumed.
5. Move the POS computer to the end of the line in the multipurpose room to reduce food waste and present a true offer versus serve situation.

Leadership and Staff Training

Leadership

The director is knowledgeable about regulations, purchasing and use of commodities and is striving to accomplish the many tasks needed to fulfill those requirements. Many of the new USDA regulations were instituted at the same time that she was hired. The director indicated that she lost most of her computer data recently and had to rebuild much of the documentation that she had developed over the last four years.

However, even though the director is working to restore documentation, there is still a need for increased communication with staff. Most Child Nutrition staff members interviewed expressed concerns about a lack of communication and a need for more site involvement by the director. Many indicated this lack of communication and involvement has caused morale problems. As mentioned before, the director's output of the menu and ordering guides needs to be more timely. In addition, the cook/manager staff stated the director no longer holds monthly meetings where they could give input. The previously held meetings were infrequent and inconsistent, with many meetings being cancelled or rescheduled. The staff have concerns that should be addressed, such as the difficulty in attracting substitute workers. Morale would be improved with consistent meetings.

Many indicated the director does not visit the sites as frequently as needed to keep connected to their issues. With the account clerk position currently vacant it may have been necessary for the director to take on more duties, but communication with staff should always be a top priority. It would also be helpful for the director to have someone, such as a clerk, proofread or assist in preparing written materials to ensure they are clear and concise.

The director needs to establish routine channels by which site staff can order small wares and supplies. Several staff members noted that they had asked for some small equipment and did not know why they had not received it. Staff are not authorized to order equipment from the vendor. It was not clear if they had asked for this equipment casually, or had sent a written request to the director.

The director or an assignee should develop a carbohydrate list for the cook/managers to use for diabetic students. Interviews indicated that each cook/manager has to look up meal components on the vendor's website when asked by the nurse or school staff. This list could be generated and made available online for the nurse/office staff as well as parents. As new products are used, this master list can be updated. This will reduce a duplication of efforts for site staff.

Recommendations

The district should:

1. Ensure that the food service director communicates with staff more often, reinstating monthly cook/manager meetings. Have someone help with proof-reading and/or assist in preparing written materials.
2. Ensure that the food service director visits each site at least twice per month.
3. Establish a formal method to order small wares and a means to communicate the status of those orders.

4. Generate a carbohydrate list for diabetics centrally and post it online (or provide copies) so that all staff can access this information and updates are more easily distributed.

Staff Training

Meetings for all staff are held at the beginning of the year and staff participate in mandatory requirement training online. The director is a ServSafe instructor for food safety and sanitation, and all permanent staff are kept current with their required certificates. The director is aware of many online training modules for staff, but needs to implement a consistent program of ongoing training. Training should be adapted to cover any current needs and issues. The online trainings are efficient and cover many mandated topics. However, it is vital for the director to also meet with staff regularly to reinforce important topics and to make them feel part of the team. It is mandated that documentation be kept on each staff member to ensure they receive the correct number of hours of continuing education. FCMAT was provided logs that listed the names of those who had completed mandated online trainings for civil rights, child abuse and pesticide, but the team was not shown the individual records kept on each staff member.

There was a concern from site managers that new hires, which are mostly substitute workers, are not given adequate training or information before being sent to school sites. FCMAT was given evidence of written information including dress code, food handling and was told that some offer versus serve explanations are given to each new staff member. New hires then typically get on-the-job training for one day with a cook/manager. However, there did not appear to be a checklist to verify that the new hires were exposed to all the necessary job tasks and information by their trainers, nor documentation to show that the new hire did receive this training.

Food safety training is one of the most vital aspects of a food service program. Regulations have been in place since 2004 in child nutrition programs for the Hazardous Analysis Critical Control Point food safety plan (HACCP). HACCP is a systematic approach to construct a food safety program and reduce the risk of food-borne hazards. It accomplishes this by focusing on each step of the food preparation process from receiving to service. It should be individualized for each district. The policy given to the study team was more of a generic guideline of how to set up a HACCP program rather than an individualized plan. The team did not see an HACCP manual.

HACCP documentation and a standard operating procedure manual should be available at each site, and should be reviewed periodically. While most of the permanent Child Nutrition staff is long-term employees, providing training to remind them of those procedures ensures the best performance. Staff members at sites were not sure whether they had HACCP manuals. One said the manual was somewhere in a drawer, but wasn't sure where it was.

In reviewing Health Department inspection reports for the 2016-17 school year, it is apparent that more ongoing training is needed in food safety. Problems that were identified on the reports included: improper concentrations of sanitizer solutions as well as lack of staff knowledge about sanitizer concentrations; improper hand-washing techniques and glove use and lack of staff knowledge about this; hot foods not held at correct temperatures; kitchen doors left open and flies present in the kitchen; improper dishwashing techniques for hand-washed dishes. For each of these violations, health department staff noted that they provided education to staff members. This is something the director should monitor, with ongoing staff training. It would be a perfect opportunity for on-site "mini" education sessions. The HACCP policies should be the basis of educational tools for food safety. Each one of the above problems noted by the Health

Department should have specific policies included in the HACCP plan. If the manuals were readily available at sites, they could be used as a reference.

Recommendations

The district should:

1. Formalize training for new hires with a consistent training program and documentation. Provide a checklist of necessary on the job tasks/information to ensure the best outcome when training.
2. Maintain documentation of training for each individual staff member.
3. Have the director review the HACCP and standard operating procedure (SOP) manual with the staff and make sure all sites have a copy and know where it is. Provide ongoing food safety training and use Health Department findings as educational tools for staff.

Wellness Policy

Wellness policies have been required for school districts participating in the National School Lunch Program since 2006. This requirement was part of the federal Child Nutrition Reauthorization Act of 2004.

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

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

There is also a new wellness requirement for all districts. On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by local educational agencies (LEAs). The final rule requires LEAs to begin developing a revised local school wellness policy during school year 2016-17. The revised policy must be in place by June 30, 2017. Districts were reminded of this requirement in a memo from the USDA in April 2017. This memo is included in Appendix D of this report.

The district has a generic wellness policy that appears to cover all the basic requirements. The policy was first approved in June 2006 as required and has a revised date of March 2014. It includes additional regulations from the 2010 Healthy, Hunger-Free Kids Act as listed above. According to the food service director the policy was reviewed during the 2016-17 school year to ensure all the requirements were covered. This may have been an agenda item in committee meetings but written information about it was not provided to FCMAT. Though the policy was not revised this year as per the above guidelines from USDA, the district may still be compliant with the regulations since the policy was revised recently and reviewed again in 2016-17. Considering the requirement for wellness policy revision during the 2016-17 school year, the district should have noted the date of its review on the written policy and submitted that to the board to make it official in the current school year.

The Wellness Committee appears to be very active. It meets frequently, including an annual wellness committee retreat. The members seem to be committed to improving the school wellness environment and ensuring stakeholders are given tools to aid them in implementing ideas. The committee has conducted staff surveys regarding awareness of and compliance with the policy at the school sites.

Recommendations

The district should:

1. Continue its active efforts to promote wellness.
2. Check with the state to ensure that the policy revision of 2014 and the committee's review of the policy this year comply with the current USDA policy.

3. Add a review date to officially document the fact that the committee reviewed the wellness policy for compliance in 2016-17.

Free and Reduced Application Process

There was some concern from site administrative staff that the Child Nutrition department was involving the school site office staff with too many duties in the collection of free and reduced price meal applications. FCMAT was given a breakdown of the steps involved that was written by district staff. This breakdown had not been given to the Child Nutrition director to check for accuracy before being given to FCMAT.

The district has a high FRPM population at all schools but one. Acquiring new applications from each family each year is a lengthy and involved process. The process is mandated by the USDA for reimbursement of meals, and the data is also used for the Local Control Fund Formula (LCFF) to establish the amount of general fund revenue provided by the state. Students who can be directly certified through the state or county because they receive categorical benefits are not required to submit an application, but notices of their approval must be mailed to the child's parent or guardian when their name appears on the list.

Child Nutrition Services appears to go to great lengths to approve each child and has made it as easy as possible for parents to comply. The issue of getting the applications returned affects nearly all school districts.

The district has made applications available in many ways. It encourages online submissions but also makes hard copies available at every site. Online submissions are preferred because the process requires completeness. The district also uses a program called Rocket Scan to process the completed hard copies. Application information is available in the packet for all new enrollees.

Students who were in the program in the last school year only have 30 operating days from the first day of school to submit a completed application. An individual Child Nutrition staff member must process and approve every application, whether online or hard copy. The issue is that a great number of families do not complete the form adequately even when they do submit it. They may leave off income, case numbers, or do not enter all household members on the form. Each of these mistakes requires phone calls, emails or mailed letters to the parents.

To meet the 30-day deadline, Child Nutrition starts in July by notifying parents repeatedly by mail, email or Edulink telephone messages in English/Spanish/Korean. They continue these efforts repeatedly until they must drop the student to paid status, and then continue to attempt contact.

Ultimately, one week before the deadline if all these efforts fail, they enlist the school office staffs to intervene by also making phone calls and Edulink broadcasts to parents.

It benefits the site office staff to assist the Child Nutrition staff in any way possible. This will limit the effect on the student if they have to be charged full price. Approvals are critical for LCFF funding.

Recommendations

The district should:

1. Continue every effort to obtain and approve free and reduced price meal applications by both Child Nutrition and office staffs.
2. Have hard copies and computers available for online submission at enrollment, back to school nights and any other opportunity where parents gather.

Paid Meal Prices and Lunch Equity Regulation

Students who do not qualify for free or reduced meals must pay for their meals, and the paid lunch equity regulation specifies the minimum amounts that must be charged for lunches. The USDA and state determine the minimum prices charged to students that do not qualify for free or reduced price meals. The Healthy, Hunger-Free Kids Act of 2010, Public Law 111-296, specifies that meals for non-needy students cannot be subsidized by federal reimbursements for meals of needy students. This became effective July 1, 2011.

There is a tool on the CDE website to calculate these prices, and the calculation must be performed annually to determine the minimum lunch prices. It is based on weighted average lunch prices from meals served in the prior year. A quick method to determine appropriate pricing is to figure the difference between the higher federal reimbursement subsidies for free meals and the lower subsidies for paid meals. The 2016-17 federal reimbursement for free lunch is \$3.18 and \$.38 for paid lunches. The difference is \$2.80, which is the minimum the district should charge for paid lunches. The district's paid lunch prices are \$2, which is much lower than the regulation requires. However, the district currently has an exemption to this requirement due to previously excessive cash reserves. This exemption is available for extension, but the district must reapply and be approved each year. The district must meet specified criteria, including meal standards, meal service and participation, wellness policy considerations, financial resources of the cafeteria fund, equipment and staffing needs, etc. A copy of the USDA memorandum and exemption considerations can be found at <https://fns-prod.azureedge.net/sites/default/files/cn/SP17-2017os.pdf>

More information on meal price equity and a calculation tool can be found at: <https://www.fns.usda.gov/paid-lunch-equity-school-year-2016-2017-calculations-and-tool>

The district should closely monitor its budget regularly to determine if this meal price exemption should continue. Since the cash balance has been reduced to allowable amounts yet deficit spending is still projected, the district may determine that it needs the extra revenue from revised increases in meal prices.

Recommendation

The district should:

1. Monitor participation and revenue to ensure that the exemption option for paid meal prices continues to be a wise practice considering the reduced cash and fund balance and continued deficit spending.

Free Breakfast and Provision 2

Breakfast prices are not included in the paid meal equity regulation, so the district can decide what it wants to charge. The district offers free breakfast to all students including paid students, and has participated in the Provision 2 program since the 2014-15 school year. This can be used for breakfasts and lunches but is only used for breakfast in Buena Park.

Provisional status is an alternative method to the usual process of collecting and processing applications annually to qualify students for the FRPM program. A district with very high eligibility is the best candidate for provisional status because even though all students eat for free, the reimbursements are paid based on the percentages of free, reduced and paid students during the base year, so the higher FRPM population, the higher the reimbursements. During the first year, or base year, the school makes eligibility determinations using the normal application process and takes meal counts by type of eligibility. If the district uses the option for breakfast and lunch it does not need to make any new eligibility determinations by applications or direct certification for the next three years. It only needs to count the total number of reimbursable meals served each day. However, Buena Park has chosen not to use Provision 2 at lunch and therefore must continue the application process each year. Though the district is able to give breakfasts at no cost to all students, it does not benefit from the reduced paperwork normally allowed by the Provision 2 option. It has continued to collect individual student meal counts in the POS computer at breakfast, which is not necessary. So, the district is not benefiting from the time-saving advantages of Provision 2.

The director stated the reason for not participating in Provision 2 at lunch is because the district wants to continue collecting the FRPM information for the LCFF data. It would not be wise to consider Provision 2 at lunch with just a 73% overall FRPM eligibility because the district would lose the income from the paid students, reducing revenue. FRPM eligibility should be above 85% to consider implementing Provision 2.

Since there is no regulation on breakfast pricing, the district could opt to give free breakfasts to all schools without being on Provision 2.

Recommendations

The district should:

1. Monitor budget trends to ensure that the department can continue to offer free breakfast to all students. If breakfast charges are implemented in the future, ensure the amount is enough to cover both food and labor expenses.
2. If the free breakfast program continues, consider dropping the Provision 2 option to avoid unnecessary paperwork and offer free breakfasts to all.

Student Meal Charges

Students that do not qualify for free or reduced price meals must pay for their meals. This is what the USDA states about students who do not bring money to school to pay for school meals:

The National School Lunch and School Breakfast Programs play a critical role in ensuring that America's children have access to nutritious food. Schools are responsible for establishing paid meal prices for children who do not receive free or reduced price meals and whose meals are thus reimbursed by FNS at lower rates. If children do not have the required payment for meals on the day of service, schools may extend credit to the child for the meal. Generally, this process entails the school allowing the child to "charge" the meal with the understanding that the child will reimburse or pay back the school for the meal provided. Since credit policies are usually established at the school district level, they vary across the nation and within States and are not monitored by FNS.

FNS considers access to healthy school meals including nutritious foods a critical function of the National School Lunch and School Breakfast Programs. Evidence shows that children who regularly eat healthy school meals perform better in the classroom and are less likely to be overweight. However, FNS also recognizes that allowing children to "charge" school meals can have financial impacts on individual schools and even school districts. This is especially true when meal charges are not subsequently paid, results in large unpaid meal charges and potential financial losses (from "Unpaid Meal Charges": USDA website at <https://www.fns.usda.gov/school-meals/fr-101614>).

Policies regarding meal charges vary from district to district. The USDA has stated that it is a district's responsibility to decide whether to allow a student to receive school meals when they do not have the money to pay for them. USDA has stated that if a district allows charging of meals, it is the district's responsibility to cover the bill if the student leaves the district without paying. The cafeteria fund cannot be used to pay for unpaid charged meals. Districts all over the country have struggled with the problem of what to do when a student comes to school with no home-packed lunch and does not have money to buy one from the school lunch program. Some districts have allowed students to charge unlimited amounts but then have needed to reimburse the cafeteria fund thousands of dollars in lost revenue. Other districts do not allow any charged meals, but this has created problems with parents.

The district's unpaid meal policy allows up to \$10 in charges from paying students. Once they get to that point they will be given an alternate meal that consists of fruit or vegetable sides and milk, but no entrée. Sites send warnings to parents before they reach the limits. From discussions with school staff, the sites may not be handling charges and alternate meals in the same way. Some allow higher charges and some do not always give alternate meals.

This policy does not appear to be strictly enforced since the district total for unpaid charges was \$8,451 at the end of the 2016-17 school year. Several students had \$30-\$40 negative balances and there were two students with negative balances of \$54 and \$69. This is a difficult problem in most districts because no one wants to see students go without meals or get an alternate meal, but it is an issue that needs to be addressed by administration working in conjunction with food services and families. As noted previously, food service funds are not allowed to cover these outstanding charges. Non-federal district funds must pay for them and they may not be carried over to the subsequent year. This becomes a liability to district general funds.

The district does not have an online payment system for prepayment of meals or repayment of charges. Many districts throughout the country use this practice successfully. District administration has not allowed Child Nutrition to pursue this because of concerns about fraud. However, these systems have proven to be safe and secure and make student payments convenient for families and collection of charges easier for districts. A great benefit with using these systems is that families can receive automatic emails or text messages when balances fall below a predetermined amount. It makes it easier for families to keep funds in their children's accounts.

Proposed California Senate Bill 250, the Child Hunger Prevention and Fair Treatment Act of 2017, would no longer allow alternate meals for students with meal charges and would require that all students receive the complete meal. There would be specific guidelines on notifying parents about meal charges and the district would be required to do whatever is necessary to make it convenient for families to pay for meals. The act would also require that the district rewrite its meal charge policy to reflect the new laws.

Recommendations

The district should:

1. Ensure site staff are aware of the written policy for meal charges and that it is consistently implemented at all sites. Have administration and the food service director work with families to help resolve ongoing problems with lunch charges.
2. Consider an online payment system to make prepayment and debt collection easier.

Personnel Activity Reports

Personnel Activity Reports (PARs) are detailed documents supporting the salaries for employees that work on multiple activities or cost objectives by identifying the employee's daily activity by hours or percentage of hours spent in each program. The federal requirements for PARs (CFR Title 2, Part 225, Appendix B 8 h) state that the 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.
- Not represent budget estimates or distribution percentages determined before the services were performed.

The Child Nutrition department has one employee (warehouse and delivery position) that works 3.5 hours for food service and 4.5 hours for the district under the general fund. The department had not been doing PARs reports for this position at the time of the FCMAT review. Staff were under the impression that they did not need to. After the study team explained this requirement and shared regulations with them, staff checked with state child nutrition officials and determined that they should be doing these reports. The district created a policy and a PARs form and will begin the documentation immediately.

The United States Department of Education (USDE) has approved a substitute system for the usual PARs reporting that minimizes the recordkeeping process by eliminating daily or monthly certifications. Specific criteria must be met to qualify for this option. Alternative documentation such as a predetermined work schedule may be acceptable instead of PARs to document the time and effort of an individual who works on multiple activities or cost objectives but on a predetermined, or fixed, schedule. An individual documenting time and effort under this substitute system is permitted to certify time and effort periodically (at least semiannually) rather than monthly. This alternate method must be pre-approved by the state before using it. More information about this option may be found at CDE at the following website: <http://www.cde.ca.gov/fg/ac/co/timeaccounting2013.asp>. There is also a publication regarding this in Appendix C of this report.

Recommendations

The district should:

1. Document the multifunded employee's work times as required on the PARs form the district created.
2. Explore the possibility of using the substitute system of reporting as described above.

Facilities

Most of the district's kitchens have adequate space and equipment for the menu they serve. However, the junior high has very little prep space and insufficient refrigeration for its needs. The junior high requires a both a bigger freezer and walk-in refrigerator. Gilbert Elementary has a very small, crowded kitchen for the number of meals served and requires upgraded refrigeration equipment. Pendleton Elementary has no walk-in refrigeration.

All sites use two-compartment instead of three-compartment sinks. This necessitates extra labor as the staff must wash and rinse dishes and then drain a sink so that sanitizer can be added to a fresh batch of water. New three-compartment sinks that would fit into the same space as the two-compartment sinks would not be costly. While the staff would lose counter space for draining and drying, this could be accommodated.

In addition, each kitchen should have a hand-washing sink within the main kitchen to facilitate frequent hand washing during meal preparation and service. Currently, many kitchens only have hand-washing sinks in adjacent bathrooms. These changes could be a good use of excess Child Nutrition Services funds if the department is trying to spend down reserves.

An assessment of the equipment needs and priorities needs to be completed and should include, but not be limited to, sinks, refrigeration, and preparation space.

The warehouse facility at the district office is adequate and provides room to take advantage of bonus commodities offered. Additional refrigeration located at the warehouse provides backup to the sites that may not have ordered correctly and have excess food needing refrigeration.

Recommendations

The district should:

1. Write a formal assessment of equipment needs for each site and prioritize spending.
2. Upgrade all two-compartment sinks to three-compartment sinks to increase efficiency. Install hand-washing sinks in each main kitchen.
3. Purchase adequate refrigeration equipment as funds become available.
4. Consider remodeling and enlarging the kitchens at the junior high and Gilbert Elementary if funds become available.

Appendices

Appendix A – Cafeteria Budget Trends

Appendix B – Meals Per Labor Hour

Appendix C – PARS Substitute System

Appendix D – Wellness Policy Revision

Appendix E – Study Agreement

Appendix A

Buena Park Cafeteria Budget Trends			
	2014-15	2015-16	2016-17
	Unaudited Actuals	Unaudited Actuals	Adopted Budget
Beginning Fund Balance	936,809	913,059	823,969
Total Revenues	2,870,971	3,020,911	3,058,500
Revenue Change		149,940	37,589
Revenue Change %		5%	1%
Salaries	1,028,409	1,064,908	1,099,558
Benefits	354,552	415,233	438,042
Total Salaries and Benefits	1,382,961	1,480,141	1,537,600
Salaries/Benefits % of Revenue	48%	49%	50%
Food and Supplies	1,363,012	1,358,769	1,412,288
Food/Supplies % Revenue	47%	45%	46%
Services and Other Operating	36,822	53,264	68,150
Capital Outlay	-	-	-
Indirect Costs	94,923	147,790	136,033
Total Expenditures	2,877,718	3,039,964	3,154,071
Excess (Deficiency)	(6,747)	(19,053)	(95,571)
Interfund Transfer In			
Ending Fund Balance	930,061	894,007	728,398
Enrollment	4,985	4,869	4,784
Enrollment Changes		(116)	(85)
Free and Reduced Eligibility	80.0%	73.0%	73.0%
Eligibility Changes		-7%	0%

Enrollment and free/reduced eligibility from CALPADS reports

Rounding used in calculations.

Appendix B

BUENA PARK SCHOOL DISTRICT												
MEALS PER LABOR HOUR (MPLH)												
October 2016												
SCHOOLS	BPJHS	Beatty	Emery	Gilbert	Whitaker	Corey	Pendleton*	Rossier*	C+P+R*	Totals	Meal Count Changes Oct '15 vs Oct '14 Oct '16 vs. Oct '15	
MEALS												
Breakfasts	8327	7450	4943	6777	4862	5005	4937	3443	13385	45744		
Bkft/Day	397	355	235	323	232	238	235	164	637	2178	475	-188
											28%	-9%
MEALS												
Lunches	12732	12485	6997	12523	9453	8192	7602	3440	19234	73424		
Lunches/Day	606	595	333	596	450	390	362	164	916	3496	-64	-88
											-2%	-2%
Total Meals	21059											
Total Meals/Day	1003	949	569	919	682	628	597	328	1553	5675		
Afterschool Snacks/day	43	194	74	84	86	138	115	0	252	733	5	-14
snack equiv/(3)	14	65	25	28	29	46	38	0	84	244	1%	-2%
A la Carte \$	6334											
A la Carte \$/Day	302											
A la Carte Equivalents	151											
Total Meal Equiv.	1168	1014	593	947	710	674	635	328	1637	6070		
LABOR HOURS	33	35	19.75	28	19.5	27.5	16		43.5	178.75		
MPLH	35	29	30	34	36				38	34		
*Corey prepares and delivers food to Pendleton & Rossier Park (private school) so meals & labor are combined for these schools.												
Meal counts for Rossier are included in Corey's numbers.												
Rounding used in calculations.												

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No. 8

United States Department of Education Approves Substitute System for Time Accounting

The California Department of Education (CDE) has released information regarding the approval by the United States Department of Education of a Substitute System for Time Accounting for federal programs. This alternative option for time accounting is intended to limit the intensive time and effort that has been required regarding recordkeeping of salaries of employees charged to federal programs. Local educational agencies (LEAs) will now have the ability to minimize the laborious recordkeeping process beginning in the current fiscal year (2012-13), but each LEA must receive approval by the CDE prior to implementation. This new system is not without regulations, but it will definitely reduce the time by all staff in managing this compliance requirement.

This is an option for LEAs, so the current system that utilizes personnel activity reports (PARs) to document time for personnel that are considered multifunded would include at least one of the programs identified as federal.

Approval

LEAs must first obtain approval from the CDE in the form of a management certification. Management certifies to the state that only eligible personnel will be utilizing the substitute system and that sufficient internal controls are in place related to the accuracy of the personnel schedules. Written procedures should be established with explicit guidelines related to the compliance requirements. The written procedures will assist LEAs with training of personnel and in preparation of programmatic and annual independent audits.

The CDE identified the following elements that should be in place prior to the implementation of the substitute system for time accounting:

- A** Proper completion of PARs or periodic certifications, including how frequently data must be recorded and what constitutes adequate documentation
- A** Required review and approval cycle
- A** Handling of completed forms
- A** Internal review process to ensure compliance

Approval is retroactive back to July 1, 2012. Once the LEA provides the CDE with the required management certification, the approval is automatically granted. Beginning in 2013-14, the certification process will be managed through the Consolidated Application and Reporting System, which will be retroactively applied to the 2012-13 for approval.

Eligibility

Specific eligibility requirements must be in place for the new approved substitute system. The following guidelines must be in place for eligible personnel to be able to utilize this option:

- A** Personnel must work on a schedule that includes multiple activities or cost objectives that must otherwise be supported by monthly PARs
- A** Personnel work on specific activities or cost objectives based on a predetermined schedule
- A** Personnel cannot work on multiple activities or cost objectives at the exact same time on their schedule

Prior to implementing the newly approved system in lieu of PARs, the personnel schedule must meet the following:

- A** Indicate the specific activity or cost objective that the employee works on for each segment of the employee's schedule
- A** Account for the total hours for which the employee is compensated during the period reflected on the employee's schedule
- A** Be certified at least semiannually and signed by the employee and supervisor who has firsthand knowledge of the work performed by the employee

We encourage all LEAs that meet the guidelines set forth in guidance provided by the CDE, to file for the management certification soon in order to take advantage of the regulations beginning in the 2012-13 fiscal year. The regulation will allow for much needed efficiency in this area of recordkeeping for LEAs.

For further information on the new Substitute System for Time Accounting, you can download the complete notification [here](#), which includes a sample schedule and certification.

—Michele A. Huntoon, CPA

Appendix D



Food and
Nutrition
Service

DATE: April 6, 2017

Park Office
Center

MEMO CODE: SP 24-2017

3101 Park
Center Drive
Alexandria
VA 22302

SUBJECT: Local School Wellness Policy: Guidance and Q&As

TO: Regional Directors
Special Nutrition Programs
All Regions

State Directors
Child Nutrition Programs
All States

Local educational agencies (LEA) participating in the National School Lunch Program and/or School Breakfast Program are required to develop a local school wellness policy that promotes the health of students and addresses the problem of childhood obesity. Wellness policies are tailored to the unique needs of each LEA and present an opportunity to improve the health of each community.

On July 29, 2016, the USDA Food and Nutrition Service (FNS) finalized regulations to create a framework and guidelines for written wellness policies established by LEAs. The final rule requires LEAs to begin developing a revised local school wellness policy during school year 2016-2017. The revised policy must be in place by June 30, 2017.

The final regulation offers LEAs flexibility in determining how best to implement policies that reflect their unique circumstances. This memorandum provides Questions and Answers (Q&As) to address the local school wellness policy final rule.

The local school wellness policy resource center available at <https://healthymeals.fns.usda.gov/school-wellness-resources> provides extensive resources school officials at the local, State, and Federal level may use to better understand the local school wellness policy requirements and their positive benefits.

Regional Directors
State Directors
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State agencies are reminded to distribute this information to Program operators immediately. Program operators should direct any questions regarding this memorandum to the appropriate State agency. State agency contact information is available at <https://www.fns.usda.gov/school-meals/school-meals-contacts>. State agencies should direct questions to the appropriate FNS Regional Office.

Original Signed

Angela Kline
Director
Policy and Program Development Division
Child Nutrition Programs

Attachment

Attachment

General

1. What is a local school wellness policy and is it required?

A local school wellness policy is a written document that guides a local educational agency (LEA) in establishing a healthy school environment. Each LEA participating in the National School Lunch Program (NSLP) and/or School Breakfast Program (SBP) is required to establish a written local school wellness policy for all schools under its jurisdiction (7 CFR 210.31(c)). LEAs have the flexibility to customize their individual local school wellness policy based on their own specific circumstances to best improve the health of their students.

2. What is required to be included in local school wellness policies?

While LEAs have flexibility to develop the specific content of their local school wellness policies, the policies must include the following:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that are designed to promote student wellness (7 CFR 210.31(c)(1));
- Standards and nutrition guidelines for all foods and beverages available on the school campus during the school day that are, at a minimum, consistent with Federal regulations for program meals and the Smart Snacks in School nutrition standards, and designed to promote student health and reduce childhood obesity (7 CFR 210.31(c)(2) and (3)); and
- Policies that allow marketing or advertising of only those foods and beverages that may be sold on the school campus during the school day, i.e., those foods and beverages that meet the Smart Snacks in School nutrition standards (available at <http://www.fns.usda.gov/school-meals/fr-072916d>) (7 CFR 210.31(c)(3)(iii)).

LEAs are also required to:

- Review and consider evidence-based strategies in determining local school wellness goals (7 CFR 210.31(c)(1));
- Involve, inform, and update the public (including parents, students, and other stakeholders) about the content and implementation of the local school wellness policy (7 CFR 210.31(d)(2) and (3));
- Conduct an assessment, at least once every three years, to determine compliance, progress, and the extent to which the policy compares to model local school wellness policies (7 CFR 210.31(e)(2)); and
- Update or modify the local school wellness policy as appropriate (7 CFR 210.31(e)(3)).

3. Who is responsible for developing the local school wellness policy?

The LEA is responsible for developing a local school wellness policy (7 CFR 210.31(a)). This responsibility is placed at the local level so that LEAs have flexibility to address the unique needs of each school under their jurisdiction. In an effort to foster transparency and inclusion, LEAs are required to allow parents, students, SFA representatives, teachers of physical education, school health professionals, the school board, school administrators, and members of the general public to participate in the development, implementation, and periodic review and update of the local school wellness policy (7 CFR 210.31(c)(5)). While the LEA is ultimately responsible for developing the local school wellness policy, a best practice would include having each school, within the LEA, customize the policy at the local level.

4. Do local school wellness policy standards apply to all foods and beverages on the school campus during the school day?

Local school wellness policies are required to address foods and beverages that are both sold and made available at no cost to students.

LEAs must develop standards and nutrition guidelines for all foods and beverages available, but not sold to students on the school campus during the school day (for example classroom parties or rewards). While, these standards and nutrition guidelines are not required to be consistent with Smart Snacks standards as stated in 7 CFR 210.31(c)(3)(iii), local jurisdictions have the discretion to adopt standards that are consistent with Federal school meals and Smart Snacks nutrition standards or to adopt more or less stringent standards.

For foods and beverages sold to students, the local school wellness policy must include standards and nutrition guidelines that are consistent with the school meal requirements and Smart Snacks nutrition standards.

5. Can nonprofit school food service account funds be used to implement local school wellness policies?

Yes, generally, nonprofit school food service account funds may be used to implement local school wellness policies, if the local school wellness policy is supporting the operation or improvement of the school meal program.

In order to use this funding for local school wellness policy related activities, the SFAs' food service program must be providing meals in compliance with National School Lunch Program and School Breakfast Program meal patterns and in compliance with resource management. In cases where only a portion of the local school wellness policy coordinator's time is spent directly supporting the school food service operation, the nonprofit school food service account may only cover the portion of the coordinator's salary that is deemed necessary, reasonable, and allocable for the operation of the school meal programs. The LEA may determine that funding a staff position or activities related to the local school wellness policy will support the operation and improvement of the Program, and that the associated

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costs are necessary, reasonable, and allocable in accordance with the cost principles of 2 CFR 200. Continual assessment of these costs is essential to ensure that the nonprofit school food service account can continue to support these activities over time.

Programs Included

6. Are small schools and Residential Child Care Institutions (RCCIs) expected to have a wellness policy?

All schools that participate in the school meal programs are expected to have a wellness policy, including small schools and RCCIs. While there are no exclusions in the law based on the size of a school or institution that participates in the meal programs, these institutions are encouraged to develop a wellness policy that meets the unique needs of their population. Because of the responsibility that RCCIs have in providing nutrition and physical activity to children in residence, it is important that RCCIs implement wellness policies that will support the health and development of their residents.

7. Is a wellness policy required if the school only operates the Special Milk Program?

A school or other program that operates only the Special Milk Program is not required to have a local school wellness policy.

8. Does the wellness policy requirement apply to private schools, including religious private schools, and charter schools?

Each LEA must establish a local school wellness policy for all schools participating in the NSLP and/or SBP under its jurisdiction (7 CFR 210.31(a)). This includes any private schools, religious private schools, and charter schools that participate in the school meals programs.

Any schools, including private and non-public charter schools, that do not participate in the school meals programs, may develop their own wellness policy, or the governing board could develop one for all affiliated schools. Such schools are not required to follow the local school district's local school wellness policy.

Food and Beverage Marketing

9. What are the requirements around food and beverage marketing?

LEAs are permitted to market foods and beverages that may be sold on the school campus during the school day, i.e., those foods and beverages that meet the requirements set forth in the Smart Snacks standards (7 CFR 210.31(c)(3)(iii)). Marketing of non-compliant food and beverages is not permitted during the school day, but may be present at events that happen after the end of the school day. For example, an evening sporting event may sell and market non-compliant foods or beverages. More information on the Smart Snacks nutrition standards

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is available at <http://www.fns.usda.gov/healthierschoolday/tools-schools-focusing-smart-snacks>.

10. How does the term “marketing” apply in local school wellness policies?

Food marketing commonly includes oral, written, or graphic statements made for the purpose of promoting the sale of a food or beverage product. Therefore, the marketing standards apply to items such as posters, flyers, and other printed materials advertising products. It also applies to prizes or other premium items given to students to promote a product, cups used for beverage dispensing, and various equipment, such as the exterior of vending machines, menu boards, coolers, trash cans, and other food service equipment. All food or beverage products depicted on items/equipment on the school campus during the school day must meet the Smart Snacks nutrition standards.

11. What types of marketing are exempt from local school wellness policies?

The marketing restrictions do not apply to materials used for educational purposes in the classroom, such as teachers’ use of advertisements as an education tool; or when implementing a health or nutrition education curriculum that favors the consumption of some foods over others.

Items exempt from the marketing provision also include items of personal expression such as clothing, and the packaging of products brought from home for personal consumption. For example, if a child wears a shirt that has a food item pictured, the food is not required to meet the Smart Snacks standards in order for the child to wear the item of clothing. Similarly, if a child brings a package of crackers from home, the food item is not required to meet the Smart Snacks standards.

12. What areas of the school are affected by the food and beverage marketing policies?

Marketing standards apply to the school campus. The school campus is defined as all areas of the property under the jurisdiction of the school that are accessible to students during the school day (7 CFR 210.11(a)(4)). School day is defined as the midnight before through 30 minutes after the end of the school day (7 CFR 210.11(a)(5)). Examples of areas affected include the cafeteria, classrooms, hallways, gymnasiums, football/soccer fields, running track, parking lots, and all other areas of the campus that students may occupy during the school day.

13. Do the food and beverage marketing policies apply to equipment such as scoreboards?

Items, such as scoreboards, that are already in place do not need to be replaced; however, LEAs must consider the marketing guidelines in the wellness policy when these items are replaced or updated over time. In addition to scoreboards, marketing policies apply to other such durable items or equipment that is on school campus property and accessible by students during the school day (7 CFR 210.11(a)(4)). These items may include signs

inside/outside of the school, water coolers, beverage cases, food display racks, and school buses.

14. Do the food and beverage marketing policies apply to after school sporting or other events?

The local school wellness policy marketing requirements do not apply to events occurring more than 30 minutes after the school day, such as after school sporting or other events. However, it is important to remember that Federal Smart Snacks standards are minimum standards and the LEA has discretion to adopt more stringent standards and extend the marketing policy to events outside of school hours.

15. My school/State has its own standards for snack foods sold in schools and/or food and beverage marketing policies. How are they affected by the local school wellness policy?

The Federal Smart Snacks standards and marketing policies are minimum requirements for schools that participate in USDA's school meals programs. States, districts, and schools that have stronger standards and policies may maintain their own policies, as long as they do not conflict with USDA standards. LEAs have flexibility on how to implement this requirement. It is not intended to imply that schools must allow food or beverage marketing on campus.

16. If a vending machine is turned off during the school day, is the outside of it (logos, pictures, etc.) still considered marketing?

Yes. The front and sides of a vending machine provide a graphic statement intended for the purpose of promoting the sale of a food or beverage product, regardless of whether the machine is on or off.

17. Is there a restriction against marketing brand names?

No, brand name marketing is not restricted. If a specific product does not meet the Smart Snacks nutrition standards, it may not be marketed on the school campus during the school day, however, the brand may be marketed. The final rule also discusses copycat products, where a company reformulates one product in a brand's product line to meet school nutrition standards. Marketing of copycat products is not restricted under the regulations.

LEAs have discretion to determine what is in the best interest of their respective school communities, however, and may implement additional marketing restrictions. LEAs may choose to include more stringent marketing standard for brand marketing and copycat products in their local school wellness policy; they may simply eliminate advertising of all brands that market foods inconsistent with the Smart Snacks nutrition standards; or they may allow both brand marketing and copycat products that meet Smart Snacks standards to be marketed in schools.

18. Do the local school wellness policy standards permit the marketing of incentive programs like a restaurant or brand that gives free pizza or coupons when students read a certain number of books?

Yes. The local school wellness policy marketing standards are not intended to restrict incentive programs. While the LEA is required to address standards and nutrition guidelines for all foods and beverages available on the school campus during the school day, it may determine what is in the best interest of their respective school communities. LEAs are encouraged to use nonfood-related incentive programs or programs that promote items consistent with the Smart Snacks standards.

19. Are label redemption programs (e.g., Box Tops for Education) allowed under this final rule?

Yes. This rule is not intended to restrict label redemption programs. Promotion of label redemption programs on school property is permitted.

Triennial Assessment

20. How often must LEAs conduct assessments of schools' compliance with the local school wellness policy?

At a minimum, assessments must be conducted once every three years as described in 7 CFR 210.31(e); this is referred to as the triennial assessment. This assessment is separate from the Administrative Review conducted by the State agency. The local school wellness policy must be updated and in compliance with the final rule by June 30, 2017. Therefore, the first triennial assessment must be completed by June 30, 2020.

21. Who is responsible for conducting the assessments?

LEAs must designate at least one LEA or school official(s) as responsible for determining the extent to which each school under their jurisdiction is in compliance with their wellness policies (7 CFR 210.31(e)(1)).

In addition to the official(s) identified, other stakeholders must be permitted to be involved in the review process as described in 7 CFR 210.31(d)(1). However, LEAs have discretion in how they implement this requirement since each LEA is best suited to determine the distinctive needs of the community it serves. LEAs are also encouraged to identify a wellness champion at each school that would assist with the implementation and monitoring of the policy at the school level.

22. What must be included in the triennial assessment?

The LEA must develop a triennial assessment report that describes the extent to which its schools comply with the local school wellness policy, the extent to which the local policy aligns with model policies, and a description of progress towards attaining policy goals as

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described in 7 CFR 210.31(e)(2). There is local discretion on the format of the report. This report must be made available to the public (7 CFR 210.31(d)(3)).

23. What tools should LEAs use to assess implementation and compliance with the local school wellness policy?

The LEA has the flexibility to develop tools that will assess compliance with the specific components of their local school wellness policy. Some State agencies and partner organizations have developed tools that LEAs can adapt to meet their needs. Example tools can be found at the “School Nutrition Environment and Wellness Resources” website at <https://healthymeals.fns.usda.gov/local-wellness-policy-resources/local-school-wellness-policy-process/assessment-needs-assessment>. In addition, the LEA must document when and how they evaluated their policy. For example, an agenda or attendance sheet could be used as documentation that the local school wellness policy was evaluated at a stakeholder meeting.

24. How often does the LEA have to update the policy?

USDA does not specify the frequency of updates to the local school wellness policy, as the need to update will vary based on the content and structure of the policy. However, it is recommended that the policy is updated, at a minimum, after conducting the triennial assessments (7 CFR 210.31(e)(3)). LEAs are also required to annually notify the public about the content of the local school wellness policy and any updates to the policy as stated in 7 CFR 210.31(d)(2).

25. How should LEAs compare their policies to model policies?

The responsibility for developing a local school wellness policy was placed at the LEA level so that each LEA has the flexibility to customize their own policy based on their own unique circumstances. However, at a minimum, LEAs must compare their policy against model policies during the triennial assessment (7 CFR 210.31(e)(2)(ii)). The Alliance for a Healthier Generation, in conjunction with USDA, developed a model local school wellness policy template that may be used for this comparison: https://www.healthiergeneration.org/_asset/wtqdwu/14-6372_ModelWellnessPolicy.doc.

26. Does the LEA need to do a triennial assessment of all the schools under its jurisdiction, or does each school do its own triennial assessment and report back to the LEA?

The LEA is responsible for ensuring that a triennial assessment of all the schools under its jurisdiction has been conducted. The LEA may conduct the triennial assessment on behalf of each participating school under its jurisdiction, or may allow each school to conduct its own assessment.

Administrative Review

27. What are the next steps if an LEA is not in compliance with the local school wellness policy requirements?

The final rule required LEAs to begin developing a revised local school wellness policy by August 29, 2016. These revised policies must be in place by July 1, 2017. While LEAs are updating and implementing new wellness policies, State agencies should focus on providing technical assistance and work with the LEA on a corrective action plan in order to achieve compliance.

Technical assistance resources include USDA's Food and Nutrition Service (FNS) Team Nutrition website. The "School Nutrition Environment and Wellness Resources" web pages provide information and guidance resources, including:

- **Local School Wellness Policy Process** steps to put the policy into action, as well as sample policy language and examples of existing State-level health policies;
- **Required Wellness Policy Elements** to meet the federal requirements;
- **Success Stories and Best Practice** ideas for schools;
- **Grants/Funding Opportunities** related to child nutrition and physical activity; and
- **Trainings** that will assist districts/schools in developing, implementing, and monitoring their wellness policies.

This website also includes information on the requirements and a summary of the final rule. The resources website can be accessed at <https://healthymeals.fns.usda.gov/school-wellness-resources>.

28. What documentation is needed for the Administrative Review?

During an Administrative Review, the State agency will review the written local school wellness policy and will ensure a LEA or school official(s) has been designated to oversee the policy process. The State agency will also review documentation demonstrating:

- Compliance with community involvement requirements, such as a copy of the solicitation on the LEA/school website or school newsletter and a list of the stakeholders involved (attendance sheet, or list of titles such as parent, school nurse, etc.);
- That the local school wellness policy content and annual updates, as well as the triennial assessments, were made available to the public, such as a copy of the LEA/school webpage and/or the school newsletter or local newspaper where the local school wellness policy and assessment results have been posted;
- How the policy compares to model policies; and
- That a triennial assessment of the local school wellness policy was conducted for each school under its jurisdiction.

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Public Notification

29. How should LEAs notify the public that they have a policy and/or there has been an update to the policy?

LEAs must inform the public each school year of basic information about the local school wellness policy, including its content and any updates as described in 7 CFR 210.31(d)(2). LEAs may best determine the optimal time for providing the information, although FNS recommends that the information be provided early in the school year. Best practices include highlighting the policy on individual school websites, linking to the policy on individual school social media accounts, sending updates in a parent or school newsletter, including the policy in a presentation during parent/staff meetings, providing copies of the policy at back-to-school nights, featuring the policy on the parent- or staff-specific webpages, and posting on school bulletin boards. Other strategies include placing a blurb in a local community newsletter or newspaper, posting on a community website or blog, or sharing updates and accomplishments on a local radio or television show. Team Nutrition's new *Local School Wellness Policy Outreach Toolkit* provides free templates to help notify the public and can be adapted to meet the LEA's needs. This toolkit can be accessed at <http://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>.

30. How often are LEAs or schools required to notify the public about the local school wellness policy?

LEAs are required to annually notify the public of the local school wellness policy and any updates to the policy (7 CFR 210.31(d)). FNS also encourages LEAs or schools to include a summary of each school's events or activities related to local school wellness policy implementation on their annual public notification. LEAs may determine the optimal time for providing the information, although FNS recommends that the information be provided early the school year.

31. Are LEAs or schools required to produce annual progress reports?

On an annual basis, LEAs are required to notify the public of the local school wellness policy and any updates to the policy (7 CFR 210.31(d)). FNS also encourages LEAs or schools to include a summary of each school's events or activities related to local school wellness policy implementation on their annual public notification.

32. Does the LEA or school official(s) designated to oversee the wellness policy need to publicize their contact information?

LEAs are only required to identify the position title of the LEA or school official(s) responsible for oversight of the local school wellness policy. However, LEAs are strongly encouraged to provide a means of contacting the LEA or school official(s) responsible for oversight by designating an LEA or school-based phone number and/or email address for the community to provide suggestions, make inquiries, request to get involved, or contribute to wellness policy implementation.

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33. How should LEAs engage stakeholders in the policy?

Each year, stakeholders must be provided with the opportunity to participate in the development, implementation, periodic review, and update of the local school wellness policy as stated in 7 CFR 210.31(d)(1). It is at the discretion of the LEA on how stakeholders are invited to participate. Suggestions for including a variety of stakeholders include:

- sending a letter to parents/families;
- providing status updates in teacher/staff trainings;
- posting a call for volunteers on the LEA website;
- including a blurb on the school, LEA, or local community newspaper, newsletter, and/or blog;
- partnering with community organizations to spread the information; and
- posting information about the process on social media.

Team Nutrition has developed an outreach toolkit to help LEAs engage parents and school staff in the development, implementation, and monitoring of their wellness policy. The customizable templates are available for download at <http://www.fns.usda.gov/tn/local-school-wellness-policy-outreach-toolkit>. Examples of other ways to engage parents are provided in the Center for Disease Control and Prevention's (CDC) Parents for Healthy Schools found at <http://www.cdc.gov/healthyschools/parentengagement/parentsforhealthyschools.htm>.

34. How should Residential Child Care Institutions (RCCIs) comply with the required public notification?

Although RCCIs may have different circumstances than LEAs, the intent of the public notification requirement is to inform the public about the process and how they can get involved. RCCIs are required to inform parents/caregivers and any other members of the public about the local wellness policy. The RCCI has discretion to determine to whom this public notification should be directed. Notification may be as simple as including the local school wellness policy and a description of how to get involved on the RCCI website, newsletter, RCCI social media, or other means of notifying families and the general public.

Please note that RCCIs are not required to inform the public regarding eligibility criteria for school meals if they do not have day students. However, they are still required to notify the public of the local school wellness policy provisions because the intent is to provide information to the public about the policy and invite members of the public to become involved.

Goals

35. Does the wellness policy have to include a specific number of hours for nutrition or physical education?

Nutrition and physical education are very important aspects of wellness and complement a healthy school environment. LEAs have discretion in determining the best way to structure their school day, and there is no requirement that an LEA include specific amount and frequency requirements (i.e., days per week, and minutes per day/week) in their policy goals, objectives, and annual benchmarks for physical education, nutrition education, and physical activity. However, FNS encourages LEAs to require a specific number of hours and/or frequency to assist in assessing whether schools are meeting their goals and to consider the Centers for Disease Control and Prevention's (CDC) recommendation of 60 minutes of physical activity each day for children and adolescents (see <https://www.cdc.gov/physicalactivity/basics/children/index.htm>).

36. What are some examples of evidence-based strategies/techniques to establish wellness goals?

The following examples of evidence-based strategies have been shown to improve the likelihood that children will make the healthier choice: using creative names for fruits and vegetables and targeted entrées, training staff to prompt students to select fruits and vegetables, placing unflavored milk in front of other beverage choices, and bundling “grab and go” meals that include fruit and vegetable items.

LEAs should review “Smarter Lunchroom” tools and strategies, which are evidence-based, simple, low-cost or no-cost changes that are shown to improve student participation in the school meals program while encouraging consumption of more whole grains, fruits, vegetables, and legumes, and decreasing plate waste (for more information, please visit, <https://healthymeals.fns.usda.gov/healthier-school-challenge-resources/smarter-lunchrooms>).

37. How can farm to school strategies be included in wellness policies?

Wellness policies offer an opportunity to showcase farm to school efforts and gain buy in from the community. According to the [Farm to School Census](#), over two thirds of school districts engaged in farm to school activities said they enjoy positive impacts, including increased support from parents and community members, improved acceptance of and participation in school meals, lower school meal program costs, and less plate waste.

Wellness policies offer an opportunity to engage community stakeholders that can help districts start and/or expand activities such as buying local foods, growing gardens, and offering nutrition, agriculture and culinary education. For specific ideas and sample language from other districts that have included farm to school efforts in their policies, please visit <https://healthymeals.fns.usda.gov/farm-school-wellness-policy-language>.

Wellness Leadership and Involvement

38. Who should oversee the wellness policy?

The LEA has discretion in determining who is responsible for overseeing the wellness policy, including assessments. The LEA is most qualified to identify the best candidate(s) for local school wellness policy leadership as size, resources, and needs vary greatly among LEAs and schools. Some LEAs have a position titled “Wellness Coordinator,” while in other LEAs, the School Nutrition Director or Lead Health Education Coordinator oversees the policy. The regulations do not specify the title or position of the designated wellness official(s), but simply require that the responsible official(s) be designated (7 CFR 210.31(e)(1)).

Regardless of who is named as the designated official(s) to oversee the wellness policy process, the CDC’s case study examination found that in successful schools, a “wellness champion” serves as the driving force for developing and implementing the wellness policy. A single wellness champion – such as a school nurse, district superintendent, or community member – led the process in many schools and districts. The champion played a critical role in starting the process and keeping it going when challenges arose. For more information, see https://www.cdc.gov/healthyyouth/npao/pdf/251553_SchoolWellnessInAction_Final_508_Ready_508tagged.pdf.

39. How does FNS define “actively” seeking members for the wellness committee? Is sending an e-mail enough?

LEAs have discretion in how they implement the requirement to actively seek members for their wellness committee. Sending an email is one example of how an LEA could meet the requirement. Other examples include a posting in a newsletter or on the LEA’s website or social media page, or creating an advertisement in a local community newsletter or newspaper.

Technical Support

40. Where can I get more information and technical support?

USDA Food and Nutrition Service (FNS) has developed wellness web-resources, as a part of the Team Nutrition website. The wellness policy website has information on the requirements and a summary of the final rule, action steps for local educational agencies and schools, tools and resources, monitoring wellness policies, funding wellness efforts, and more. The FNS Local School Wellness Policies website can be accessed at <http://www.fns.usda.gov/tn/local-school-wellness-policy>.

Additionally, FNS’ “School Nutrition Environment and Wellness Resources” web page provides information and resources to support the local school wellness policy process, and includes sample policy language, examples of existing State-level health policies, stories and best practice ideas for schools, grants and funding opportunities, and trainings to assist districts/schools in developing, implementing, and monitoring their wellness policies. The

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resources website can be accessed at <https://healthymeals.fns.usda.gov/school-wellness-resources>.

The CDC also has many resources that can help inform the content and implementation of wellness policies. There are resources on topics that include Smart Snacks, physical activity and physical education, measuring Body Mass Index in schools, and engaging parents to participate in school wellness activities. CDC also has assessment tools including the School Health Index which schools can use to assess their health policies and practices and then create a plan to improve their health and safety policies and practices. These helpful CDC resources can be accessed at www.cdc.gov/healthyyouth/npao/publications.htm.

CDC's "Putting Local School Wellness Policies to Action: Stories from School Districts and Schools" provides helpful strategies and examples for additional resources for schools. This resource can be accessed at https://www.cdc.gov/healthyyouth/npao/pdf/251553_SchoolWellnessInAction_Final_508_Ready_508tagged.pdf.

FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT

December 7, 2016

The Fiscal Crisis and Management Assistance Team (FCMAT), hereinafter referred to as the team, and the Buena Park 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

The scope and objectives of this study are to:

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 provide 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.

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 study team will be supervised by Michael H. Fine, Chief Administrative Officer, Fiscal Crisis and Management Assistance Team, Kern County Superintendent of Schools Office. The study team may also include:

- | | |
|----------------------------|-------------------------|
| A. <i>To be determined</i> | <i>FCMAT Staff</i> |
| B. <i>To be determined</i> | <i>FCMAT Consultant</i> |
| C. <i>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. \$650 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.
- 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 \$18,300.

- 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).

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 fieldwork, 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**

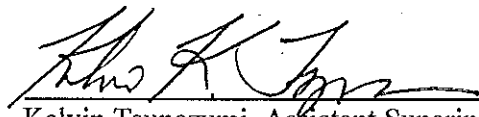
During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile liability insurance in the amount required under California state law, and workers compensation as required under California state law. FCMAT shall provide certificates of insurance, with Buena Park 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: Kelvin Tsunezumi, Assistant Superintendent, Administrative Services
 Telephone: (714) 736-4263
 E-mail: ktsunezumi@bpsd.k12.ca.us


 Kelvin Tsunezumi, Assistant Superintendent 11/17/17
 Administrative Services Date
 Buena Park School District


 Michael H. Fine, December 7, 2016
 Chief Administrative Officer Date
 Fiscal Crisis and Management Assistance Team