



CSIS California School Information Services

Alvord Unified School District

Food Service Review

March 14, 2019



Michael H. Fine
Chief Executive Officer





March 14, 2019

Allan Mucerino, Superintendent
Alvord Unified School District
9 KPC Parkway
Corona, CA 92879

Dear Superintendent Mucerino:

In September 2018, the Alvord Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's food service program. Specifically, the agreement states that FCMAT will perform the following:

1. Examine the food service department's operations 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 work flow and distribution of functions, and make recommendations for improved efficiency, if any.
3. Review training and professional development programs for the department's employees and managers, and make recommendations for improvements, if any.

This report contains the study team's findings and recommendations.

FCMAT appreciates the opportunity to serve the Alvord Unified School District and extends thanks to its staff for their cooperation and assistance during this review.

Sincerely,

Michael H. Fine
Chief Executive Officer

FCMAT

Michael H. Fine, Chief Executive Officer

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About FCMAT

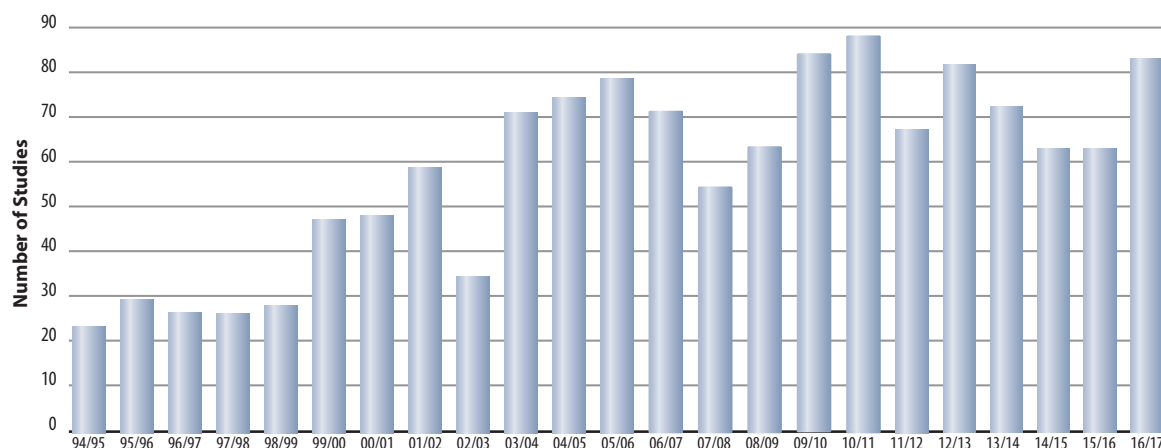
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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

Located in Riverside County, the Alvord Unified School District has a five-member governing board and serves approximately 18,400 students at 14 elementary schools, four middle schools, three comprehensive high schools and two alternative high schools. According to data from the California Department of Education (CDE), student enrollment peaked at 20,057 in 2008-09 and has decreased in all but one year since that time.

The district participates in the National School Lunch and School Breakfast programs; breakfast and lunch are offered at all district schools, and after-school snacks and suppers are offered at most elementary and middle schools. The district's California Longitudinal Pupil Achievement Data System (CALPADS) records indicate that the 2018-19 free and reduced-price meal eligibility is 77%.

In September 2018, the district and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for management assistance to review the operations of the district's Child Nutrition Services Department.

Study and Report Guidelines

FCMAT visited the district on December 4-7, 2018 to conduct interviews, collect data, observe the food service operations and facilities, and begin reviewing documents. Following fieldwork, FCMAT continued to review and analyze documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Budget
- Management and Oversight
- Staffing and Meals per Labor Hour
- Meal Program and Menus
- Operational Processes and Procedures
- Participation Trends and Provisions Eligibility
- Warehouse and Purchasing
- Facilities and Equipment
- Competitive Foods
- Wellness Program
- Training and Professional Development
- Appendices

FCMAT's reports focus on systems and processes that may need improvement. Those that may be functioning well are generally not commented on in FCMAT's reports. 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.

Study Team

The study team was composed of the following members:

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

Executive Summary

Revenues generated by a food service program ideally should be able to fund all department expenses, including indirect costs, with appropriate reserves maintained. The district's unaudited actuals reports indicate that the cafeteria fund deficit spent \$241,671 in 2016-17 and \$233,778 in 2017-18. Based on the 2018-19 first interim report, the fund is projected to deficit spend \$1,785,636, leaving a projected fund balance of \$1,349,859. To address deficit spending, the district needs to identify areas of cost reductions and/or revenue increases.

Based on the study team's experience, labor costs and the costs for food and supplies should each be 40%-45% of revenue. However, the district's annual labor costs for 2016-17 and 2017-18 were 47% and 51% of revenue, respectively, and the projected costs for 2018-19 are 60%. The annual food and supplies costs for 2016-17 and 2017-18 were 46% and 45% respectively, and the projected costs for 2018-19 are 50% of revenue.

Some of the responsibilities of the Child Nutrition Services Department managers are unclear. In addition, some duties appear to overlap, and opinions conflict on some issues. It is important that the roles of each management position be defined and provided to department staff, and written procedures that clarify who is responsible for food service procurement should be developed and implemented. The management team should also maintain a schedule for and log of site visits to ensure it routinely visits all schools, provides proper oversight and training, and assesses program compliance and student satisfaction. The center manager should be in the central kitchen frequently to observe, supervise, and train staff.

A review of comparison districts and interviews with staff indicate that the Child Nutrition Services Department is staffed appropriately in management positions, but slightly overstaffed in clerical/support positions. The district should review the duties of each clerical/support position and consider reducing staff by 1.0 full-time equivalent (FTE).

Employee absences are extremely high. The information provided to FCMAT indicates that it is not uncommon for 30 or more food service employees to be absent each day. This is disruptive to the department, creates a lack of consistency in daily routines, and is costly. If employees are routinely absent, it may indicate an abuse of leave benefits, which should be monitored and addressed by the district. The district should also work with the classified bargaining unit to clarify language in the collective bargaining agreement on the use of extended sick leave benefits.

Labor costs are generally one of the largest expenses in a food service operation; therefore, it is important for the department to operate efficiently and ensure that staffing ratios are adequate to meet the needs of the program without being excessive. Meals per labor hour (MPLH) is an industry standard used to measure staff efficiency and help determine the appropriate staffing levels in a food service operation. In school food service it is a best practice to maintain 30 MPLH, but with labor efficiencies of a central kitchen, MPLH should be higher. FCMAT's analysis shows 26 MPLH districtwide, which indicates overstaffing for the number of meals served.

MPLH can be improved by increasing student participation or reducing staff, and it often requires some of each. Student participation at breakfast and/or lunch is very low at some sites, and ways to improve it are discussed throughout this report. Examples include: offering breakfast in the classroom at more sites, implementing a later start time for lunch service at school sites that start serving lunch before 11 a.m., offering a mid-morning second chance breakfast at elementary schools and a nutrition break at secondary schools, locating food cruiser carts in various locations at secondary schools, and prohibiting outside vendors from delivering food to

students on campus. Management staff should discuss ways to improve participation at all sites with the entire child nutrition staff, and students, parents and school site staff should be polled to find ways to entice more students to participate.

Before filling any open position, the district should review the staffing at all sites and in the central kitchen to determine if some positions can be eliminated or reduced in work hours to increase MPLH. Improving MPLH should be a priority for the food service program to be self-sustainable and not require a contribution from the unrestricted general fund.

There are significant differences between the presentation and types of food offered at the elementary schools and secondary schools. The serving lines at secondary schools have a lot of variety and color, but the elementary serving lines observed by the study team were unappealing as presented and appeared skimpy. The district should improve the offerings and presentation of food at elementary schools by adding a variety of entrées and colorful side dishes. At least two fruit and two vegetable choices should be offered at lunch, and consideration should be given to offering vegetable choices at breakfast. Sites should not routinely run out of food during meal service; however, backup items should be kept at each site so if food shortages occur, an item that is popular with all student groups affected can be provided.

The district uses the Provision 2 claiming method for breakfast, allowing all students to eat for free. Provision 2 (for lunch) and the Community Eligibility Provision (CEP) reimbursement claiming option should also be evaluated for implementation to determine if they are viable for the district. These options reduce staff time to process meal applications, simplify meal counting and claiming procedures and allow all students to eat for no charge, which may also increase participation. In evaluating these provision options, the district should be aware that if the cost to provide the meals is more than the reimbursement received, the cost differential must be paid from sources other than federal funds. The effects on student data collection and reporting used for the Local Control Funding Formula (LCFF) should also be considered.

During the study team's visit, the kitchen at Norte Vista High School had a water leak in the ceiling over one of the serving lines. Staff indicated that the leak has been an issue for several years when it rains. The district should immediately assess and repair or replace the roof.

The district has some competitive food sales that do not meet federal and state regulations, including stores operated by student entities. Failure to abide by competitive food sales requirements may result in the state withholding federal and state meal reimbursements. It is vital that the district educate staff, students and parents about competitive food sales laws, regulations and policies, and ensure that all groups follow them.

The study team's observations indicated that food service staff members need more training on the offer versus serve requirements and efficient work methods in the central kitchen, particularly on the assembly lines. In addition, the operations supervisor should be notified of all new substitutes so they can be provided with an orientation and appropriate training prior to assignment in a kitchen.

Some of the language in the district's agreements with its classified and certificated bargaining units is a hindrance to food service operations. For example, there is an agreement with the bargaining units that requires the majority of a school's teachers and classified staff whose duties are impacted to agree that breakfast in the classroom may be offered at that site before the program is implemented. However, the welfare of students should be the first priority in determining whether breakfast in the classroom is implemented. The district should work with its bargaining units to change any language in agreements that hinder food service operations.

Findings and Recommendations

Budget

Ideally, a school district food service program should be self-sustainable. Revenues generated by a program should be able to fund all department expenses, including indirect costs, with appropriate reserves maintained.

FCMAT reviewed the district's cafeteria fund budgets for the current and preceding two fiscal years and found that since fiscal year 2016-17, program expenditures have exceeded revenues (also known as deficit spending), which indicates an ongoing structural budget deficit. The unaudited actuals reports for the district's cafeteria fund indicate that the food service program deficit spent \$241,671 in 2016-17 and \$233,778 in 2017-18.

Food and labor costs are the majority of any food service expense budget. Based on the study team's experience, food and labor costs should each be approximately 40%-45% of revenue. An analysis of the district's 2016-17 unaudited actuals report indicates that labor was 47% of revenue, and food and supplies costs were 46%, both slightly above the expected standard. An analysis of the 2017-18 unaudited actuals report indicates that labor was 51% of revenue, and food and supplies costs were 45%. Labor costs were not within the expected standard, which contributed to the deficit spending for that fiscal year.

The 2018-19 first interim report indicates that the program is projected to continue to deficit spend by \$1,785,636. An analysis of the report indicates that labor costs are projected to be 60% of revenue, and food and supplies costs are projected to be 50%, both well above the standard of 40%-45%. In addition, the district projects \$150,000 in uncollected student meal charges for the current fiscal year.

The first interim report shows that the budgeted amount for indirect costs is approximately \$143,600 below the 5.02% maximum allowable rate that the program may be charged in 2018-19. Indirect costs consist of business and administrative expenses such as budget, payroll, accounts payable, human resources, and data processing services provided to all programs. The true program cost is not shown if the full amount of indirect costs is not budgeted and charged to the cafeteria fund. Even in a deficit spending situation, the district should charge indirect costs to the cafeteria fund because they are legitimate responsibilities of the program.

The following table provides a summary of the cafeteria fund budget from 2016-17 through the 2018-19 first interim report.

Cafeteria Fund Budget

	2016-17 Unaudited Actuals	2017-18 Unaudited Actuals	2018-19 First Interim
Beginning Fund Balance	\$3,610,944	\$3,369,273	\$3,135,495
Total Revenues	10,705,821	9,963,590	9,716,600
Salaries	3,616,558	3,539,918	4,001,708
Benefits	1,429,142	1,503,377	1,796,245
Total Salaries and Benefits	5,045,700	5,043,295	5,797,953
Salaries/Benefits % of Revenue	47%	51%	60%
Food and Supplies	4,918,592	4,439,508	4,827,599
Food/Supplies % of Revenue	46%	45%	50%
Services and Other Operating	282,720	135,258	325,291
Capital Outlay	204,600	78,555	145,347
Indirect Costs	495,880	500,752	406,046
Total Expenditures	10,947,492	10,197,368	11,502,236
Excess (Deficiency)	(241,671)	(233,778)	(1,785,636)
Ending Fund Balance	\$3,369,273	\$3,135,495	\$1,349,859

Source: District financial reports

Rounding used in calculations

To address deficit spending the district needs to identify areas of cost reductions and/or revenue increases, many of which are discussed throughout this report.

Annual labor costs from 2016-17 through 2018-19 are higher than the expected standard. The department's annual labor costs range from 47% to 60% when compared to annual revenue. It is important to keep a balance of revenue to expenditures, and to accomplish this, labor costs should be within the recommended guidelines of 40%-45% of total revenue. A portion of the increased cost for labor has been imposed on the food service program because of increases in the California Public Employees' Retirement System (PERS) employer contribution rates. However, high labor costs can be an indicator of excess staffing, which is further analyzed in the Staffing and Meals per Labor Hour section of this report.

Food costs vary depending on the type of service offered. Districts that offer only meals cooked from scratch have lower food costs but higher labor costs than those that buy premade meals. For example, food costs for meals prepared from scratch should be approximately 35% of revenue, while premade meals are usually 40%-45% of revenue. Because the district offers a combination of meals that are premade and made from scratch, its average food cost should be approximately 40% of revenue. However, as shown in the above table, the district's annual food costs are between 45% to 50% of revenue.

The 2018-19 board approved operating budget, adopted on June 28, 2018, indicates a \$491,827 reduction in projected revenue and a decrease in projected expenditures of \$1,414,158 compared to 2017-18 estimated actuals. Labor was budgeted at 60% and food and supplies costs were budgeted at an unrealistic 33% of revenue. The stated excess of \$2,064 in revenue over expenses also appears to be unrealistic, given the deficit spending trend.

The 2018-19 first interim report, which includes year-to-date transactions through October 31, 2018, indicates that the program will continue to deficit spend by a projected \$1,785,636. Food and supplies costs for 2018-19 were originally budgeted at 33% of revenue. Those projections have been increased to 50% of revenue. Labor costs are still projected at 60% of revenue. Interviews with staff and the 2018-19 uncertified CALPADS report indicate that the district is experiencing a decline in student enrollment. Therefore, the Child Nutrition Services Department has projected a decline in meal participation and a resulting decrease in revenue.

Title 7 Code of Federal Regulations Section 210.19 requires that net cash resources for the cafeteria fund not exceed three months' average expenditures. The district's School Nutrition Program (SNP) net cash resources (NCR) calculation for fiscal year 2017-18, summarized in the table below, shows that it complied with this requirement. The CDE requires a separate calculation for the Child and Adult Care Food Program (CACFP), and the NCR shows that it did not comply with this requirement. The district's 2017-18 NCR calculation for the SNP shows it has 0.8 months in average expenditures, or \$842,825, under the allowable cap. The NCR calculation for the CACFP reflects an excess in revenue of 17.2 months' average expenditures. However, the revenue and expenditure totals used in the calculation do not match those in the 2017-18 unaudited actuals report as required.

Net Cash Resources Calculation

		SNP	CACFP
I.	Income Statement:		
a.	Total Revenues	\$9,546,014	\$643,530
b.	Total Expenditures	9,928,668	398,052
c.	Net Income for the School Year	(382,654)	245,478
2.	Fund I3 Ending Balance	2,135,776	804,016
3.	Number of Full School Months in Fiscal Year	10	10
4.	NCR Calculation:		
a.	Average Operating Monthly	\$992,867	\$39,805
b.	Fund I3 Ending Balance	2,135,776	804,016
c.	Three Months of Expenditures	2,978,601	119,416
d.	Fund I3 Net Cash Resources	(842,825)	684,600
	Number of Months Over/Under	(0.8)	17.2

Source: District's CDE Nutrition Services Division Form SNP-57, rounding used in calculation

Recommendations

The district should:

1. Eliminate deficit spending in the cafeteria fund by developing and implementing a plan to reduce expenditures and/or increase revenues.
2. Ensure that the budget includes realistic revenue and expenditure projections.

3. Closely monitor the entire budget throughout the year to ensure revenues and expenditures are within the projected budget and make adjustments as necessary.
4. Ensure that the director of child nutrition services reviews and analyzes student participation trends to identify problem areas.
5. Review staffing levels throughout the department, including school site, central kitchen, management and clerical support to identify labor efficiencies. Review all open positions against efficiency ratios prior to filling.
6. Charge the full allowable indirect cost rate to the cafeteria fund.
7. Immediately review all costs associated with operating the CACFP to make certain all program costs are accounted for and make the budget revisions necessary to reduce the excess revenue, per state requirements.
8. Utilize the unaudited actuals report for the previous fiscal year when calculating net cash resources.

Management and Oversight

Child Nutrition Services is a large department with approximately 155 staff members, including four management staff, five clerical/support staff, and seven food service worker floater positions. The central kitchen has 28 employees, and the remaining food service workers are located at 23 sites throughout the district. This is a complex operation to manage, and federal and state regulations are detailed and a challenge to implement.

The four management staff members must oversee employees, food transportation and safety, student and staff satisfaction, and ensure program regulations are followed at all school sites and a large central kitchen. The management positions are: director, operations supervisor (an assistant director position), center manager for the central kitchen, and nutrition specialist. Additionally, a food service manager II works in the central kitchen; this is a classified bargaining unit position that has some supervisory duties.

Overseeing this size of a food service operation can be daunting, and it may sometimes be difficult to balance all the required duties. It is important that expectations and responsibilities for all positions are carefully defined and reviewed regularly. Site observations and discussions with staff suggest that operations in the central kitchen and at some sites may not receive the oversight they need.

The study team's observations at the central kitchen indicated that staff do not work to full capacity. For example, the assembly line for the packaged items had significantly more staff than needed based on the speed of the packaging machine. When chef salads were packaged, nine people worked on the line, each putting one item on the salads, and two people were at the end of the line placing food packages in racks. This process could be done with about half the number of staff. In addition, staff at one school indicated that sites are limited in the number of chef salads they can order because of production issues. However, this does not appear to be the case based on the information that the study team was provided at the central kitchen. More training is needed to ensure that sites know how much they can order and to ensure that sites are not limited in the number of items they can order, particularly for those that are popular with students.

In another area of the central kitchen, three people filled racks with commercially prepackaged calzones for distribution to sites. This task could be done by two people. Because these are commercially packaged heat-and-serve items, consideration should also be given to sending full cases of these types of products to sites for site staff to place in racks or trays and heat.

The central kitchen once made pizzas for sites, but management determined it was less expensive to use a local vendor's product, which is delivered daily. However, the amount of staff in the central kitchen stayed the same. This may be part of the reason so many people are assigned to tasks.

During FCMAT's visit, eight people cut and packed frozen broccoli because it was not thawed ahead of time. Three or four people can package fresh broccoli. There was reportedly some miscommunication about the unavailability of fresh product, and frozen product was not pulled from the freezer soon enough. However, staff indicated it is not uncommon for product not to be thawed in a timely manner. The broccoli was not of good quality, and the study team observed that the end product on the lunch line the next day was overcooked and strong smelling.

Some staff indicated that food shortages are often a problem because product is not delivered from vendors in a timely manner. This may be due in part to the involvement of several staff

members in the ordering process, which is discussed further in the Warehouse and Purchasing section of this report.

The food service manager II and the storekeeper must deliver food to sites several days a week because delivery drivers are absent. This hinders the operation and supervision of the central kitchen and may also be the reason product is not thawed timely and communication is less than optimal.

Employee absences in the Child Nutrition Services Department are extremely high. Staff interviews and documents provided to FCMAT indicate that having more than 30 absences per day is not uncommon, and over 40 employees (over 25%) are gone on some days. This is disruptive to the department, creates a lack of consistency in daily routines, and is costly. In addition to the cost of seven floater positions, district documents show that the cost of substitutes was approximately \$190,000 in 2016-17 and \$152,000 in 2017-18. Inexperienced substitutes may also not have the same skills or productivity as regular staff. Interviews indicated that many staff members routinely use more than their allotted sick leave each year. This may be in part because of wording in the classified collective bargaining agreement, Article XVII, Leave Provisions, that states the following:

(b) Entitlement to Other Sick Leave

In addition to (a) above, unit members shall once a year be credited with a total of 100 working days paid sick leave. Such days of paid sick leave shall be compensated at not less than 50 percent of the employee's regular salary.

As written, employees may interpret that it is routinely permissible for them to take their annual sick leave allotment plus 100 additional days of sick leave every year. Such extended leave benefits are provided by state law; however, they are typically used sparingly and for extenuating circumstances. Employees routinely using extended leave may indicate an abuse of leave benefits, which should be monitored and addressed by the district.

The study team visited nine school sites and found that most of the meal service operates smoothly with friendly staff. Some staff indicated that they never see food service managers at their sites; however, others said they do. One commented that when managers visit the site, they do not interact with food service staff. Some staff indicated the center manager spends most of his time in the office or the warehouse instead of the kitchen. Because the center manager is primarily responsible for the central kitchen operations and staff evaluations, site visits are not his priority, but time should be spent regularly in the central kitchen to observe and assist in problem solving. This would also assist with completion of employee evaluations, as well as improvements in productivity and quality control.

The rest of the management team indicated that site visits are made two to three times a week, and all sites are visited at least once a month. To ensure all school sites are visited routinely and receive proper oversight, management staff should maintain a schedule for regular visits. Although it is often easy to lose track of this oversight task given managers' numerous responsibilities, site visits are important to let staff know they matter and for managers to observe staff for evaluation purposes and to assess program compliance and student satisfaction.

It is also a best practice to keep a log or calendar of site visits. The operations supervisor and nutrition specialist could divide the schools between them so they each are familiar with certain schools and staff, or they could rotate the schools so they each have a good understanding of the operations at all sites. Because the operations supervisor and nutrition specialist are responsible for all site staff evaluations, they should be the primary managers of the schools' food service

operations. The child nutrition services director has numerous administrative duties; however, it would also be beneficial for him to routinely visit all the site kitchens and spend time in the central kitchen to provide additional oversight for the department.

Interviews with staff indicated a lack of knowledge regarding the duties of each management position. The study team also found a lack of clarity about each manager's responsibilities. Some duties appear to overlap (such as ordering), and there are conflicting opinions on some issues. One example is the issue discussed previously regarding the understanding of some site staff that they can order only a limited amount of certain items, such as chef salads. Interviews with the operations supervisor and the nutrition specialist indicated this item has a limit because of production issues; however, the center manager indicated sites may order as many as they need. As another example, production issues and cost were the reasons given for not offering two fruits and two vegetables to elementary school students at lunch. However, based on the number of staff in the central kitchen, production should not be a limiting factor on the number of items sites can order or the ability to offer a variety of fruit and vegetable choices.

Food service staff should be made aware of the responsibilities of each manager, and it would be prudent for the management team to re-evaluate their priorities, clarify the duties of each manager, and make adjustments as necessary. Some of the top priorities should be to provide quality food in adequate amounts and serve students foods they enjoy so they will participate in the food service program. For example, elementary students should be offered a choice of fruits and vegetables rather than just one of each. Interviews with staff indicated one of the reasons a variety is not offered is because of the cost limit that the department has set for each elementary meal. Budget is critical in a food service program, but being overly cautious about food cost instead of focusing more on student satisfaction may reduce participation and decrease revenue.

Interviews indicated that one of the nutrition specialist's main priorities is wellness activities outside of the daily meal program. While these activities are important, daily meal service, menu acceptance by students and program compliance should be the top priorities. As discussed elsewhere in this report, the elementary menus lack variety and choice in fruits and vegetables. The district has shown a commitment to wellness by having a nutrition specialist position, and the lunch lines could be used as a primary example for teaching children wellness by offering a variety of quality fruits and vegetables.

The food service manager II job description states in part that the position supervises new personnel and is "responsible for evaluation of on-site personnel." This position is part of the classified bargaining unit. However, a supervisory employee may not be in the same bargaining unit as an employee he or she supervises. Government Code Section 3540.1(m) states the following:

"Supervisory employee" means an employee, regardless of job description, having authority in the interest of the employer to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to assign work to and direct them, or to adjust their grievances, or effectively recommend that action, if, in connection with the foregoing functions, the exercise of that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

Based on interviews with staff, the food service manager II does not appear to have supervisory or staff evaluation duties. The individual assists the center manager with ordering and helps with food production, warehouse and driving duties as needed. However, if the food service manager II does evaluate food service employees or does any of the things described in Government Code Section 3540.1(m), the position should not be in the classified bargaining unit.

Staffing Comparison

Data for a comparison of the Child Nutrition Services Department's management and clerical/support staffing was obtained from the Hacienda La Puente, Jurupa, and Norwalk-La Mirada unified school districts.

Although comparative information is useful, it should not be considered the only measure of appropriate staffing levels. School districts are complex and vary widely in demographics and resources. Careful evaluation is recommended because generalizations can be misleading if unique circumstances are not considered. FCMAT's review considered district type, student enrollment, free and reduced-price meal eligibility and cafeteria fund revenue when choosing the comparison districts. Data for the following comparison was taken from the Education Data Partnership (Ed-Data) website, and department staffing information was obtained directly from the comparison districts.

Comparison of Child Nutrition Services Staffing In Selected California School Districts

District	Alvord	Hacienda La Puente	Jurupa	Norwalk-La Mirada
Enrollment*	19,005	18,438	19,112	17,890
Free/Reduced-Price Meals Percentage*	78.3	73.0	76.3	72.5
Cafeteria Fund Revenue**	\$10,705,821	\$10,875,194	\$9,132,723	\$11,035,337
Management Staff	Director	Director	Director	Director
	Nutrition Specialist	Assistant Director	Supervisor (2.0)	Coordinator
	Operations Supervisor	Supervisors (2.0)		Supervisor (2.0)
	Child Nutrition Center Manager			
Total Management Staff	4.0 FTE	4.0 FTE	3.0 FTE	4.0 FTE
Clerical/Support Staff	Assistant to the CNS Director	Office Assistant (2.0)	Food Service Clerk	Secretary
	Secretary II	Senior Account Technician	Food Service Coordinator (nonmanagement) (2.0)	Bilingual Clerk
	Bilingual Secretary I	Account Technician (0.5)	Technology Facilitator	Senior Account Technician (2.0)
	Account Tech/Computer Support			
	Bilingual Clerk Typist II			
Total Clerical/Support Staff	5.0 FTE	3.5 FTE	4.0 FTE	4.0 FTE

Alvord - District has a central kitchen; CNS office and central kitchen are located in the same facility. Management staff, the assistant to the CNS director, and the account tech/computer support are 8 hour/12 month positions; the remainder of the clerical/support staff are 8 hour/11 month.

Hacienda La Puente - District does not have a central kitchen. Director and assistant director are 8 hour/12 month positions, supervisors are 8 hour/11 month; clerical/support staff are 8 hour/11 month positions, except for the senior account technician, who is 8 hour/12 month; district is assessing whether another account technician position needs to be filled.

Jurupa - District does not have a central kitchen. Management and clerical staff are all 8 hour/12 month positions.

Norwalk-La Mirada - District has a central kitchen; director and one supervisor are located at the central office, coordinator and one supervisor are located at the central kitchen. Management and clerical staff are all 8 hour/12 month positions. Department uses consultants approximately 15 hours per week for some administrative/clerical duties.

*Source: Ed-Data 2017-18

**Source: Ed-Data 2016-17

The data above indicates that the three comparison districts have an average of 3.67 full-time equivalent (FTE) management staff; however, two of the districts do not have a central kitchen. Alvord Unified has 4.0 FTE, and based on the comparison districts, it is staffed appropriately. The data further indicates that the three comparison districts have an average of 3.83 FTE clerical staff. Alvord Unified has 5.0 FTE, and based on the comparison districts, it is slightly overstaffed.

Recommendations

The district should:

1. Carefully define the roles of each management position and communicate this information to department staff.
2. Review the priorities of the nutrition specialist and ensure that department supervision is not overlooked because of wellness activities outside the meal program.
3. Ensure that management staff plan and implement regular site visits and keep a log of them. This is vital for quality control, program compliance and employee morale.
4. Ensure that the center manager is in the central kitchen frequently to observe, supervise, and train staff.
5. Ensure that the child nutrition services director routinely visits schools sites and spends time in the central kitchen to observe operations.
6. Ensure that all management staff are in agreement about menu and production issues, such as the number of items that sites may order from the central kitchen and multiple choices of fruits and vegetables. Sites should not be limited in the number of menu items they may order if students want them and the central kitchen can produce them.
7. Ensure that the correct number of central kitchen staff are assigned to each task to maximize efficiency.
8. Consider sending full cases of packaged heat-and-serve items to sites for staff to place on trays and heat.
9. Work with vendors to ensure orders are delivered timely.
10. In addition to food costs, consider student satisfaction when determining menu items and food variety.
11. Ensure that food is thawed timely, and develop back-up plans for pulling food from the freezer if the person responsible for this duty is absent or assigned elsewhere, such as to food delivery.
12. Monitor employee absences and address all abuses of leave benefits.

13. Work with the classified bargaining unit to clarify the collective bargaining agreement language regarding use of the 100 days of extended sick leave.
14. Determine if the food service manager II position evaluates food service employees or does any of the things described in Government Code Section 3540.1(m). Based on that determination, work with the classified bargaining unit to revise the job description or remove the position from the classified bargaining unit, as appropriate.
15. Review the duties of clerical/support positions and consider reducing staff by 1.0 FTE.

Staffing and Meals per Labor Hour

Because labor costs are generally one of the largest expenses in a food service operation, it is important for the department to operate efficiently and to ensure that staffing ratios are adequate to meet the needs of the program without being excessive. The district has a central kitchen facility and 23 school sites. Additionally, the district provides food to five Head Start programs, four of which are on district campuses and one that is at a private daycare center in Riverside. Four elementary sites participate in the Fresh Fruit and Vegetable Program, which is a federal grant that subsidizes extra fruits and vegetables to be served to students at a time other than the breakfast and lunch meal service.

The central kitchen prepares all the meals for the elementary schools, Head Start, alternative high schools and students with special diets. This kitchen also prepares many of the cold items for the middle schools and comprehensive high schools. Supper meals are purchased as prepackaged items from an outside vendor and are delivered to sites daily from the central kitchen. The kitchen has 26 food service workers and warehouse/delivery staff, and the total number of staff hours for this facility is 191, not including the center manager, custodian and maintenance personnel. All central kitchen staff work seven to eight hours per day. Staff previously worked four hours per day in the central kitchen and three to four hours at sites serving food, but this changed during a department reorganization. Site staff were hired, and central kitchen staff kept all their hours and work them all in the central kitchen, significantly increasing total department staff hours.

Meals per labor hour (MPLH) is an industry standard used to measure staff efficiency and help determine the appropriate staffing levels in a food service operation. For this analysis, the 191 central kitchen staff hours were added to the site labor hours based on the amount of food prepared at the central kitchen for each site. Overall, approximately 83% (159 hours) of central kitchen production goes to the elementary schools and 17% (32 hours) to secondary.

Labor hours for management, clerical, custodial and maintenance staff are not included in the calculation because it is a measure of the labor it takes to prepare, deliver and serve the meals. The department has seven floater positions that total 24.75 hours a day. However, these positions are used to cover absences every day and are not extra hours; therefore, they are not counted in FCMAT's MPLH analysis.

Each of the five Head Start programs has a 3.5-hour position at the site to heat and serve meals sent from the central kitchen and clean up after meal service. The hours for these positions are not a district financial obligation because the county office reimburses the district for these costs. The hours for these positions are not included in the analysis, but the central kitchen labor and meal counts are included in the counts at the affected elementary sites. Bryant Park Head Start is a private school served by the district, and because they are included separately on the state meal claim, they are included separately in the MPLH analysis.

In school food service, a best practice is to maintain 30 MPLH, but with the labor efficiency of a central kitchen, the MPLH should even be higher. At the district's elementary schools, all the food is sent from the central kitchen; therefore, MPLH at these sites should exceed 30.

MPLH can be calculated several ways. The analysis must include all meals served and a la carte sales. Lunches are counted as a whole meal equivalent. Breakfasts are sometimes counted as a fraction of a meal equivalent because they are simpler to prepare than lunch and/or are ready-to-serve items; they are counted as full meal equivalents if site prepared menu items are served. In this analysis full meal equivalents were used for breakfast at the high schools and middle schools, and 0.5 meal equivalents were used at elementary schools because of the type and number of menu items that are served.

A la carte sales were only counted at the secondary schools because the elementary schools sell very little outside of the meal program. A la carte sales are converted to a meal equivalent based on gross revenue earned. Typically, the a la carte meal equivalent is derived by dividing the total revenue by the average of breakfast and lunch prices. Because Alvord Unified does not charge students for breakfast, only the lunch prices were used. Lunch prices for middle and high school students are \$2.50; therefore, a la carte sales totals were divided by that amount to obtain an a la carte meal equivalent.

Many of the elementary and middle schools also serve after-school snacks. These are simple prepackaged items, so they were counted in the MPLH calculation as 0.33 of a meal equivalent. Supper meals were counted as 0.5 of a meal equivalent because they are commercially prepared ready-to-eat products (e.g., sandwiches, entrée salads, cheese or hummus with crackers or pretzels).

FCMAT's MPLH analysis is attached in the appendix section of this report. Following is a summary of the analysis for each school:

Elementary Schools	MPLH	Secondary Schools	MPLH
Arlanza	27	Arizona Middle	23
Collett	27	Loma Vista Middle	28
Foothill	30	Villegas Middle	27
La Granada	29	Wells Middle	28
Lake Hills	27	Hillcrest High	20
McAuliffe	29	La Sierra High	23
Myra Linn	28	Norte Vista High	27
Orrenmaa	26	Alvord Continuation	12
Promenade	28	Alvord Alternative	13
RMK	26		
Stokoe	30		
Terrace	29		
Twinhill	25		
Valley View	28		
Bryant Park Head Start	24		
Average Elementary	28	Average Secondary	24
District Average	26		

The district average MPLH is 26. Two elementary schools (Foothill and Stokoe) have 30 MPLH, and the district elementary school with the lowest MPLH is Twinhill at 25. The totals for La Granada and Stokoe may differ slightly from normal because La Granada Head Start is closed for remodel, and those students are housed and fed at Stokoe. Therefore, La Granada may be slightly below its usual MPLH and Stokoe slightly above, but the difference is minimal.

The elementary site total staff hours vary, ranging between 7.5 and 14 hours a day. Two sites have three employees (Arlanza and Twinhill) and the rest have two. The highest number of site staff hours are at Arlanza, Terrace and Twinhill. However, Twinhill serves considerably fewer meals than Arlanza and Terrace. Twinhill also has four more staff hours a day than Stokoe, which has a higher total number of meal equivalents.

Loma Vista and Wells middle schools are the highest secondary sites at 28 MPLH, while the lowest are Alvord Continuation and Alvord Alternative schools at 12 and 13 MPLH, respectively. The lowest comprehensive secondary school is Hillcrest High School at 20 MPLH. All secondary sites fell short of the 30 MPLH target.

These MPLH results indicate overstaffing. Based on the study team's experience and observations, the central kitchen has too many labor hours for the number of meals prepared. This is likely a result of the previous decision to hire more site staff and assign staff who previously worked at the central kitchen and school sites to work all of their hours at the central kitchen.

Although the district uses the Provision 2 meal claiming method for breakfast, which allows all students to eat for free, meal counts are very low. The average breakfast participation at the district's elementary schools is just 37%. Four elementary schools have breakfast in the classroom: Arlanza, Myra Linn, Terrace and Twinhill. Myra Linn started the program recently; therefore, the October breakfast counts used to complete the MPLH analysis did not include this change. Breakfast counts at this site should improve in the future. The sites that serve breakfast in the classroom have significantly higher meal counts than those who do not serve breakfast in the classroom. Arlanza served breakfast to 94% of its students. Terrace served 82% and Twinhill served 88%, and although these are efficient meal counts, all sites that serve breakfast in the classroom should be closer to Arlanza's percentage.

Breakfast participation at secondary schools is quite low, with an average of 19%. Some school districts offer a mid-morning second chance breakfast to elementary students at recess and/or a nutrition break at secondary schools. This may help improve participation because many students are either not hungry early in the morning or arrive too late to eat. The middle schools and some of the elementary schools start serving lunch by approximately 10:30 a.m., one begins as early as 10 a.m.; therefore, this may not be an option at these sites unless the lunch schedules change.

Although the district has a high percentage of students (77%) who are eligible for free and reduced-price meals, lunch counts are very low at some sites. Districtwide, 62% of the total student enrollment (which includes free, reduced and paid students) participate in lunch. Six elementary schools – Arlanza, Colette, Foothill, La Granada, Myra Linn and Stokoe – have lunch participation of 80% or above. The other sites range from 44% to 78%.

The secondary schools average 54% lunch participation. Loma Vista and Wells middle schools are the highest at 74% and 82%, respectively. The other sites range from 38% to 56%. It is not uncommon for secondary schools to have lower participation than elementary schools. The district's high school campuses are not closed for all students, and according to staff, hundreds of students leave for lunch every day. Some students also order lunches from outside vendors and have it delivered to them on campus. As discussed in the Competitive Foods section of this report, some high school student stores also compete with the food service program at lunch.

Four elementary sites have the Fresh Fruit and Vegetable Program, where additional fruits and vegetables are served to students at a time outside the meal program, such as recess. Staff at one school indicated that they have additional personnel to prepare food for this program. Although the federal grant pays staff costs for this program, additional staff should not be needed based on the low MPLH counts. Existing staff should be able to prepare and serve the food for the program, and the applicable time should be charged to the grant.

MPLH can be improved in two basic ways: increase participation or reduce staff, and it often requires some of each. The most positive way to improve MPLH is to increase participation, and methods of doing this are discussed throughout this report. It would also be beneficial for the food service management staff to discuss ideas for improving participation among themselves and with site staff, including ideas such as student food preferences and menu changes that may entice more students to participate in the meal program.

As discussed in the Budget section of this report, labor costs for 2017-18 were 51% of revenue, and the first interim report projects that labor costs will increase to 60% in 2018-19. The MPLH analysis also indicates that the department is overstaffed. Improving MPLH should be a priority in order for the food service program to be self-sustainable and not require a contribution from the unrestricted general fund.

The least disruptive method of reducing labor hours is often through attrition, rather than layoffs. At the time of FCMAT's fieldwork, management staff indicated that the Child Nutrition Services Department had approximately 22 vacant positions. Before filling any position, it would be beneficial for the district to review the staffing at all sites and in the central kitchen and determine if some positions can be eliminated or reduced in work hours. The central kitchen accounts for a large portion of the department's staff, and it may be prudent for the district to consider the previous staffing pattern of having some central kitchen staff split their time between the central kitchen and school sites as site positions become available.

A MPLH report from the district's point-of-sale software system was provided to the study team. However, it did not include supper meals or central kitchen hours and, therefore, is not an accurate portrayal of productivity.

Recommendations

The district should:

1. Ensure that the child nutrition management team reviews staffing regularly and creates productivity goals.
2. Complete a MPLH analysis monthly that encompasses all aspects of meals and labor hours.
3. Review staffing at all sites and in the central kitchen before filling open positions, and adjust it as needed to increase MPLH. As site positions become available, consider transferring central kitchen positions or some hours of central kitchen staff time to sites and not refilling the vacated central kitchen hours.
4. Ensure that food service management staff discuss ways to improve participation at all sites with the entire child nutrition staff. Students, parents and school site staff should also be polled to find ways to entice more students to participate.
5. Consider implementing a later start time for lunch service at school sites that start serving lunch before 11 a.m.

6. Consider implementing a second chance breakfast at elementary schools that do not serve breakfast in the classroom and a nutrition break at secondary schools.
7. Consider closing high school campuses at lunch and prohibiting outside vendors from delivering food to students.
8. Use existing staff to prepare and serve food for the Fresh Fruit and Vegetable Program and charge the applicable time to the grant.

Meal Program and Menus

Meal Program

The district participates in the National School Lunch and School 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 and were the most comprehensive changes to the program in 15 years. Initial revisions 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 regarding these issues:

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

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

The 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, including dark green, red/orange, starchy, and legumes. While this is nutritionally sound, it has complicated menu planning and to some extent, student acceptance. A full cup of fruit must be offered at breakfast for all grade levels. At lunch, one-half cup of fruit and three-fourths cup of vegetables must be offered to K-8 students, and one cup of both fruit and vegetables must be offered to high school students (grades 9-12). Students must take at least one-half cup of fruit or vegetable with both breakfast and lunch whether or not they want it. Districts have experienced an increase in waste because of these requirements, but precise nutritional standards must be met.

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 and stipulate that “hidden” fruits or vegetables baked into other items cannot count toward the fruit/vegetable requirement.

The Child Nutrition Services Department’s last CDE Administrative Review in January 2018 found that all review areas were in compliance. This indicates that the menus submitted by the district were deemed to be nutritionally adequate and acceptable under the National School Lunch Program (NSLP) regulations. All menus passed the criteria for the NSLP certification for having the proper items and serving sizes available daily. The district uses the TrakNOW software to ensure menu compliance.

Menus are planned for breakfast, lunch, after-school snacks and supper. Elementary lunches are on a four-week cycle and include two entrées per day; one choice is always vegetarian. On one day in the cycle, both choices are cheese; cheese pizza and a cheese sandwich. The choices on this day are not good for students who either have an intolerance for dairy or do not like cheese. At one site, staff mentioned that chef salads are only offered to students in grades 2-5, at another site they are offered to those in grades 3-5, so the younger children do not get an alternate choice. If this is because of the perception that younger children do not like salad, another option should be provided because the current practice limits choice and makes the nutrient analysis incorrect for children who are not offered the salad.

The secondary schools offer approximately seven to 11 lunch entrées per day, including a variety of sandwiches and burritos. Entrées that remain the same most days are spicy chicken sandwich, hamburger, cheeseburger, cheese pizza and pepperoni pizza. There are at least two vegetarian offerings per day.

The district offers the required three-fourths cup vegetable in one selection per day for elementary students. On one day, the study team observed that only three-fourths cup of refried beans was offered as the vegetable, which is a large portion of beans for most students to consume. It would be beneficial to offer a variety to promote the consumption of vegetables and support the district's wellness policy goals. Offering one-half cup of inexpensive, possibly commodity, vegetables and an alternate, such as packaged carrots, would promote choice and make the serving line more attractive.

On paper, this may appear to add to the meal cost, but in practice, the number of portions served would show minimal increase in cost and better consumption of the vegetables offered. When planning the menu, the cost of each item is totaled as if each student takes the item; this is known as the pre-cost. However, the district has implemented the offer versus serve meal planning option that allows students to decline some of the food offered in a reimbursable meal. It includes regulations regarding the portion size and type of food that must be offered to and taken by each student. Because all items are not taken, the actual cost of food that needs to be purchased is lower; this cost is called the post-cost. The Child Nutrition Services Department has set tight meal cost limits. However, quality and variety should also be considered to encourage more participation.

There is a large contrast between the presentation and types of food offered at the elementary schools versus the secondary schools. The elementary serving lines observed by the study team were unappealing as presented and appeared skimpy. The lines included two entrées, one fruit, and one vegetable. On one day, calzones and chef salads were the entrées, but the site ran out of salads, so students had no actual choice. The broccoli was overcooked and unappealing, and there was no second choice. On another day there was chicken taquitos, and the vegetarian option was "flauquitos." The two entrées looked the same and were served in sheet pans on a flat counter; neither choice had much appeal. The site also ran out of refried beans and did not have another vegetable option. By contrast, the serving lines at secondary schools had a lot of variety and color, with multiple choices of entrées and sides. The food looked fresher and more appealing, and the variety included fresh salads, protein packs, wraps and sandwiches.

According to the menu, the fruit offered for lunch is limited to one item per day at the elementary schools. During FCMAT's visit, some sites offered more than one fruit in the serving line, which added to the attractiveness of the presentation and to the idea of choice. However, discussions with staff indicated that this variety is not encouraged. The elementary breakfast menus typically include two fruit choices or one fruit and one juice choice.

Offering a variety of fruits allows students who lack teeth, those with braces, and those who lack dexterity to choose a fruit that can be consumed easily and in a timely manner. The study team observed younger students struggling with whole fruit, such as oranges. The students wanted to eat them, but even after helped by a food service worker, could not peel the fruit in a timely manner. Site kitchens should be supplied with fruit/vegetable wedge cutters to slice fruit for at least students in grades K-2.

Each student is required to take one-half cup of fruit or vegetable, and these items should be suitable for quick consumption. The study team observed that staff have sufficient time, particularly at breakfast, to cut fruit while waiting for students to arrive. In addition, providing a choice of whole fruit, cut fruit and wrapped fruit would encourage students to eat it while decreasing the cost of throwing fruit away. Students who did not intend to eat the fruit could be encouraged to take wrapped fruit and place it on the share table. A recipe could be written for “fruit variety” that includes fruits such as raisin boxes and applesauce cups, which are prewrapped.

Some districts have successfully offered vegetables such as carrots and cucumbers at breakfast. This may provide another item for variety and would satisfy the requirements for students to take one-half cup fruit or vegetable at breakfast. Wrapped items could be offered again at lunch.

Interviews indicated that some site food service staff do not think their recommendations for menu items are considered by the department’s managers, and they are not given an adequate explanation for why an item is not acceptable. Increasing communication about menu items during the management team’s monthly meetings with site leads may help make staff feel more included in the process. Menu planning to meet all the USDA requirements is a tedious, time-consuming process, and the district uses a cycle menu to help streamline it. Quickly adding new items or new menus requires a considerable amount of work and skill to meet all requirements. A review of this process in the monthly meetings may help staff understand why their ideas are not quickly incorporated.

Some teachers have reportedly expressed concerns that breakfast menu offerings have too much sugar. At the time of FCMAT’s visit, breakfast in the classroom had just been implemented at Myra Linn, and one staff member stated that some teachers do not give the meal to students because they think some items have too much sugar. The study team’s review of the menu found that it meets USDA regulations and includes a variety of entrées, alternating between a baked item (such as a muffin) and a hot entrée (such as a breakfast burrito or bacon and egg sandwich). Commercial items offered to schools are typically controlled for sugar content and must contain whole grains, making them healthier than the name of the product may imply. It may help to provide teachers with the nutritional analysis of breakfast items and explain specifically how they are different from retail products if this has not been done already.

The December 2018 elementary school breakfast menu shows the daily availability of a low sugar cereal and an entrée at all schools, including those that offer breakfast in the classroom. It would also be beneficial to offer string cheese or a hard-boiled egg daily because this gives students a protein option they enjoy, possibly increasing participation. Cereal bars are less messy and therefore may be a better option than cereal bowls with milk for breakfast in the classroom.

Meal Accommodations

The nutrition specialist must make accommodations for approximately 80 students throughout the district to ensure that students with conditions such as diabetes, renal failure and food intolerances are offered appropriate foods. Each of these meals must be planned and some separately delivered. In addition, school site nurses rely on nutritional analysis data from the Child Nutrition Services Department website to monitor that appropriate foods are taken by those students with these conditions who can choose their own meals from the cafeteria.

Recommendations

The district should:

1. Consider changing elementary menus so that cheese entrées are not the only two options on any given day.
2. Offer chef salads to students in all grade levels at elementary schools.
3. Offer at least two fruit choices at both lunch and breakfast in elementary schools.
4. Offer at least two vegetable choices at lunch and consider offering vegetable choices at breakfast in elementary schools.
5. Improve the presentation of food on the serving lines at elementary schools by adding a variety of entrées and colorful side dishes; add some decoration or change how the food is presented to add color and variety for eye appeal.
6. Ensure that sites do not routinely run out of food.
7. Consider offering protein packs, cold sandwiches and salads as options at elementary schools.
8. Provide fruit/vegetable wedge cutters to site staff.
9. Offer cut fruit for ease of consumption and wrapped fruits and vegetables to decrease waste.
10. Ensure that site food service staff is included in menu planning, and communicate reasons for not accepting menu item suggestions from staff.
11. Ensure that teachers serve the breakfast in the classroom meal to students.
12. Provide teachers with nutritional data for breakfast items and explain how the foods differ from retail products.
13. Offer string cheese or a hard-boiled egg daily at breakfast in elementary schools to increase protein consumption.
14. Consider offering cereal bars rather than cereal bowls for breakfast in the classroom.

Operational Processes and Procedures

Food Preparation

The district combines preparation of food items between the Child Nutrition Center (central kitchen), a large centralized facility where prepacking is done, and the school sites. The central kitchen provides meals for elementary schools, Head Start, the alternative high schools and after-school snacks. Supper meals are purchased from an outside vendor and delivered to sites from the central kitchen. The central kitchen prepares salads, sandwiches, small scratch cooked burritos, and does some scratch cooking of items for all sites. Elementary school food service staff heat food that has been thawed, racked and delivered from the central kitchen and wash fruit. Secondary schools prepare most of their own food. Because food products cannot be packaged and held over the weekend, menus must be written to allow central kitchen staff time to prepare and package more food on Mondays and Tuesdays, and staffing needs may be slightly greater on these days than the rest of the week.

As discussed in the Management and Oversight section of this report, the study team observed a packaging line that was not producing as fast as possible. The conveyor speed was slow, workers used only one hand to scoop or place items in the packages, and the line had considerably more people than necessary.

The study team also observed commodity frozen broccoli used as a substitute for romaine lettuce because of a recall on lettuce. Staff indicated that cutting the broccoli was necessary so it could be run successfully through the packaging machine. This was a time-consuming, uncomfortable and unsafe process for staff. A better choice as an emergency substitute vegetable is corn or peas, and products that do not require thawing should be kept on hand to prevent this situation from occurring again. Having a suitable backup plan that is available on short notice at the central kitchen requires that the child nutrition center manager closely supervise and direct warehouse staff.

Site staff reported that menu item substitutions occur frequently, and the reason usually given to staff is that vendors shorted the order. However, some staff indicated they are not given enough notice by the central kitchen on menu substitutions. Sufficient notice is needed because a substituted item may affect how much sites order depending on its popularity.

School Site Ordering

Secondary schools order their own food from vendors; they are given an order guide from which to choose food. Elementary schools order their food products from the central kitchen. However, all sites order bread, dairy, and produce that is delivered directly to each site.

The child nutrition center manager places vendor orders one month in advance based on the menu order guides, history and experience. Each site submits a final order to the central kitchen five days in advance of delivery to the sites, and orders can be adjusted up to the day before delivery. In addition, the central kitchen sends drivers to sites on the day of meal service for emergency needs.

During FCMAT's observations of lunch service, one site ran out of refried beans during the first of three meal periods, but the site had not planned for a backup and did not have a vegetable available to serve students. At most sites, the study team observed sufficient refrigeration to store a few more cases of food. The central kitchen also has a large amount of refrigerated space where backup items could be stored and taken to sites with the daily food deliveries. Canned or dry storage products could also be used for emergency backup items. It would be beneficial for

central kitchen supervisory staff to review daily production sheets to obtain information about food shortages and substitutions at the sites to minimize future occurrences.

The routine need for backup food may also indicate that site leads need more training regarding the order process. Site leads should be trained to keep accurate records of the number and type of food items students chose each day. The district's four-week cycle menu should make this easy because the same combination of foods is offered each time on the menu. Although daily production records that require this information must be kept, some site leads also keep their own simplified menu calendar with numbers of items chosen. This simplified method does not require use of a computer and provides a quick reference that helps the lead and any substitute employee who may be required to place an order and plan the amount of food to heat.

Some staff indicated the operations supervisor has directed them to serve each product until it is gone, even if it means shorting the upper grades who have a later lunch period. However, staff tends to split the product between student groups, shorting all of them. With either method, all of the menu items may not be available to all students. A solution to the issue of shortages and how to best serve the customer should be discussed between the central kitchen and site staff. Backup items that are popular with all student groups should be available regardless of which method is chosen to ensure there are food options available for all groups. Participation may decrease when a student expects a certain food to be available, but they must settle for something he or she does not like.

Meal Service

All serving lines observed by the study team moved quickly. The district uses the Meals Plus point-of-sale software system, and students enter their personal identification number (PIN) on one of two pads located at each station. Speed lines, equipment that allows students to serve themselves some food items, are used at most secondary sites. These lines increase the speed at which each student can move through the line, and some of the district's high schools use them along with serving windows to give students more points of sale. Snack items are offered in addition to reimbursable meals at the windows. Serving windows are more labor intensive than speed lines, and students typically move through them more slowly. Two of the three comprehensive high schools have only one lunch period, which necessitates more labor for a short period of time to serve. Many districts successfully employ students to work the short duration of time necessary to serve, especially during lunch period, because students can work for an hour or less. This would allow food service employees to work at cruiser carts or other serving areas.

The four middle schools each have three lunch periods, which start at approximately 10:30 a.m. A lunch served this early hinders participation because many students have just had breakfast. Consideration should be given to consolidating lunch periods, possibly by combining those for sixth and seventh grade, to better utilize labor and offer lunch later in the day.

At lunch, elementary students line up alphabetically by classroom, which is an efficient system. Most elementary schools observed by the study team did not use speed lines, but instead displayed food on service counters. The counters were efficient given the limited food choices; however, some sites displayed the counters attractively, which made the food look appetizing, and others did not. For example, a few sites displayed different colored fruits in rows, placed fruit on both sides of the entrée and/or put whole fruit in bowls to increase eye appeal. Others placed only one type of fruit in a pan. It may be helpful for child nutrition managers to share photos and/or display techniques with site leads.

Student Participation

Although all sites have Provision 2 for breakfast, which allows all students to eat for free, interviews indicated that participation has not increased as much as expected, especially at the secondary schools. The district has implemented breakfast in the classroom at four elementary schools; implementing the program at all elementary schools would give every child an opportunity to eat and may also be financially beneficial to the department. The breakfast in the classroom programs observed by the study team were efficient. Students and a few parent volunteers (in the lower grades) brought carts to the classrooms, and teachers continued to teach and do preliminary duties while students took and consumed the food. Some districts also offer breakfast in the classroom at the secondary level, which may be a beneficial option for Alvord Unified to explore.

The district's agreement with the certificated and classified bargaining units requires the majority of a school's teachers and classified staff whose duties are affected (interpreted by the district as 100% of affected employees) to agree that breakfast in the classroom may be offered before the program is implemented at that site. This is likely an unrealistic expectation at many schools, and the welfare of students should be the first priority in determining whether breakfast in the classroom is implemented. The Child Nutrition Services Department has spent a considerable amount of time explaining the program to staff and assisting schools with the start-up process.

As shown in the MPLH analysis in the appendix section of this report, the three schools (Arlanza, Terrace, and Twinhill) that served breakfast in the classroom in October 2018 had participation rates substantially higher than the other schools. The participation rates for these three sites ranged from 82% to 94%. In contrast, the other elementary schools ranged from 11% to 35%.

Secondary students often skip breakfast in favor of extra sleep, or they are not hungry until later in the morning. Because a trip to the cafeteria for breakfast may be out of the way for some students, it could be beneficial to place a cruiser cart near each school's entrance to ensure that students have the best opportunity to take a breakfast. Meals can be offered as prebagged grab-and-go meals or simple components to be chosen by each student. If meals are served in multiple locations, computers or tablets that are synced to the Meals Plus software can be used to track reimbursable meals.

Because social and intramural activities are more important than mealtime to many students, lunch participation may increase at the secondary schools if meal service is offered closer to where students assemble. Carts could be used to offer limited menus such as protein boxes, selected cold item grab-and-go bags and/or parfait boxes, to simplify service. Even students who leave campus at lunchtime may grab a bagged lunch to be eaten when they return. It may be feasible to start carts with a meal that includes only one popular entrée that students can carry to their lunchtime activities such as a protein box or sandwich. Most of the district's schools have a high percentage of students who are eligible for free and reduced-price meals; therefore, offering reimbursable meals on carts may help increase participation and maximize revenue. Snack carts should also be considered. Large cruiser carts could be pulled by golf carts or other motorized pull systems if distances are too great to push them. Central kitchen labor could be utilized to prepare grab-and-go meals for secondary schools to use on carts.

Interviews indicated some are reluctant to experiment with new programs such as food cruiser carts to increase participation because of the necessity for increased labor. However, based on FCMAT's MPLH analysis, this could likely be done with the current amount of staff.

Domino's Pizza is offered only at the secondary schools; to generate excitement, it could also be offered once per month at each elementary school. Although the cost is higher than frozen pizzas made with commodity cheese, students who do not eat in the cafeteria may be introduced to the meal program on these days and continue to participate.

To attract new customers, giveaway contests may be successful at the secondary schools. Drawings for items such as an iPad or Fitbit that require students to enter the cafeteria may generate exposure to the menu and result in students establishing a new routine. For example, the drawings could require that students come in the cafeteria and get a meal each day for a week, or some other specified length of time, to participate. This may be especially helpful to promote Provision 2 free breakfast.

The district encourages students to complete applications for free and reduced-price meals in many ways, including large posters outside of each school advertising the cost savings to parents. The district also provides assistance in completing the online applications and completes the direct certification process monthly. Direct certification allows a student to be automatically enrolled for free meals without having to complete an application, based on his or her eligibility for other assistance programs.

Food Waste

Interviews with staff indicated that breakfast in the classroom generates a significant amount of waste because all foods on the menu are available for all students regardless of the amount usually taken. Although USDA requires that all five breakfast items be available to all students, the same historical data that can help predict the number of actual servings typically taken can be used for the breakfast in the classroom program. A best estimate amount can be sent to each classroom, with extra servings available in the cafeteria that can be sent after a call from the classroom. Delivering extra food to a classroom may require a diversion from other duties for cafeteria staff; however, the savings in food costs may be significant and, based on FCMAT's MPLH analysis, this should not require additional staff. Keeping an accurate consumption history of each daily menu item and ordering the correct amount of food based on this history would eventually prevent too much extra food from being sent to each classroom.

It may be advantageous to develop a separate menu for breakfast in the classroom. The study team's observations indicated that some foods that are well accepted at traditional cafeteria breakfast are not as well accepted or adapted to breakfast in the classroom. Food service site staff indicated that the hot entrées are not as popular as the cold items. A slightly different menu may also alleviate other concerns, such as spillage of cereal. For example, the popular cereal in a bowl could be replaced with a cereal bar. A separate menu may make breakfast in the classroom more acceptable to both teachers and students. In addition, the initial effort of meal planning and additional ordering requirements may be offset by an increase in participation.

In its cafeterias, the district has provided share tables where students can place wrapped food they do not intend to eat, making it available to other students. Any unwrapped or temperature sensitive food that is not taken from the share table must be thrown away. Because students must take a fruit or vegetable item at each meal, offering a variety of whole and cut fruits and vegetables as well as wrapped items would encourage students to eat them and decrease the cost of waste. Less food needs to be purchased if some can be reused. Students learn that if they are not going to consume a fruit or vegetable, packaged items can be placed on the share tables and reused.

Recommendations

The district should:

1. Develop a backup plan for emergency food situations to ensure a safe and efficient operation.
2. Notify site food service staff in a timely manner about menu substitutions so that adjustments can be made to their order.
3. Increase the speed of packaging lines where possible and train staff to use both hands when working on the line for maximum efficiency.
4. Review and implement best forecasting and ordering techniques with site leads.
5. Provide options to keep backup food at each site, and if food shortages occur, provide a backup item that is popular with all student groups affected.
6. Ensure that central kitchen supervisory staff review daily production sheets.
7. Ensure that central kitchen supervisory staff review site orders for accuracy.
8. Review the history of student choices and site orders to determine the reason for food shortages and discuss these issues and how best to prevent them with site leads.
9. Consider employing student workers during high volume meal service times at the high schools.
10. Consider consolidating lunch periods at the middle schools.
11. Train elementary site staff on techniques for more attractive food display.
12. Increase the number of schools offering breakfast in the classroom as soon as possible.
13. Bring grab-and-go meals or breakfast components to school gates via cruiser carts to encourage breakfast consumption at secondary schools.
14. Locate food cruiser carts at areas on campus where students assemble during lunch at secondary schools.
15. Offer Domino's Pizza at elementary schools once per month to entice participation.
16. Consider incentives such as giveaway contests to attract students to serving areas, especially for Provision 2 free breakfast.
17. Develop a separate menu for breakfast in the classroom.
18. Send the amount of food for breakfast in the classroom based on typical consumption for that classroom rather than all menu items for all students.
19. Make wrapped fruit and vegetables available to students so that they can be reused after meal service.

Participation Trends and Provisions Eligibility

Participation

FCMAT visited nine school sites to observe the practices and meal participation of each site for breakfast or lunch. Most serving lines observed flowed smoothly, especially at the remodeled schools equipped with speed lines. Breakfast meal service times vary from school to school, but some start serving as early as 6:45 a.m., and some serve until 8:45 a.m. Lunch meal service times start as early as 10 a.m. at some sites, and some end as late as 12:45 p.m. The district has a closed campus policy for all schools; however, juniors and seniors at the high schools can leave campus during lunch with parent written permission.

According to the October 2018 meal claim report, the district's free and reduced-price lunch participation is 70% of eligible students, which is good but could be improved. Some school districts have a participation rate of 80% or greater for students who are eligible for free and reduced-priced meals, particularly in schools with closed campuses. Paid lunch participation is extremely low at 35% of eligible students. This may be partly because of the limited number of food choices at the elementary sites, but in large part is due to the common tendency of secondary students not wanting to participate in school meals. Student stores operating during the lunch meal service also decrease student meal participation, which is discussed further in the Competitive Foods section of this report.

At breakfast total participation is only 27% of enrolled students. This is extremely low considering that the district operates breakfast under Provision 2 and offers breakfast in the classroom at four school sites.

Many factors can affect participation, including free and reduced eligibility, menus, the time of day meals are offered, and the speed of serving lines. Demographics may prevent an increase in eligibility and participation because some students may have a higher income and prefer to purchase a la carte items instead of participating in the traditional meal program. These issues should be identified and changes considered. For example, student taste testing activities could be periodically scheduled to allow them to sample new products, and the food service program should be promoted at Wellness Committee meetings where parents and students can identify with the benefits of school meals.

Provisions Overview and Eligibility

The district uses the standard method of claiming federal and state reimbursement for lunches served to students. With this method, the district receives reimbursement based on each participating student's meal eligibility of free, reduced, or paid. For students who qualify for free lunch, the district can claim the highest reimbursement of \$3.57 for each served meal; the reduced-price per-meal meal reimbursement rate is \$3.17; and the district gets 33 cents for each paid meal. The rates of reimbursement typically increase slightly each school year. Aside from these reimbursement rates, the district receives an additional six cents per meal for all lunches served (free, reduced, and paid). The district receives reimbursement by reporting daily counts of meals served by eligibility category at each site using Meals Plus, an automated meal counting system. When a district utilizes the standard method of claiming federal and state meal reimbursements, a considerable amount of paperwork must be collected for each student or household to annually determine each student's eligibility to comply with the USDA requirements.

In an effort to reduce the amount of paperwork at the local level, in the 1980s Congress incorporated into Section 11(a)(1) of the National School Program Act three alternative provisions (Provisions 1, 2 and 3) to the standard requirements for annual determination of eligibility for free and reduced-priced meals. Of these three alternative claiming provisions, the most commonly used

by school districts is Provision 2. The district operates breakfast under this provision; however, it processes participation by each individual student, which is not necessary or required with Provision 2. Instead, a total student count of participation at each meal session may be entered in the district's point-of-sale system, reducing the time and labor needed to account for these meals.

The Provision 2 claiming method reduces the annual meal application burden substantially and simplifies meal counting and claiming procedures. Schools in the district that qualify will establish baseline claim percentages in a given base year and serve all meals at no charge for four years. Eligible schools must serve meals to all participating students at no charge during the base year and the three subsequent years, including those students identified as reduced and paid. The benefits of this alternative method are typically achieved for school sites with free and reduced-price eligibility rates of 70% or higher. This provision also allows a district to make determinations based on individual schools.

According to the district's uncertified 2018-19 CALPADS eligibility data provided to the study team, several schools in the district have a large percentage of students eligible for free or reduced-price meals, while others do not. For example, 94% percent of the students at Arlanza Elementary School qualify for free or reduced-priced meals. In comparison, only 44% of the students at Lake Hills Elementary School are eligible. The districtwide free and reduced eligibility was 77% as of November 9, 2018.

	Enrollment	Free/Reduced Eligibility
Allan Orrenmaa Elementary	555	73%
Alvord Alternative High	163	91%
Alvord Continuation High	168	77%
Arizona Middle	918	82%
Arlanza Elementary	517	94%
Collett Elementary	578	86%
Foothill Elementary	559	91%
Hillcrest High	1,638	58%
La Granada Elementary	626	93%
La Sierra High	1,723	75%
Lake Hills Elementary	738	44%
Loma Vista Middle	992	87%
Myra Linn Elementary	523	91%
Norte Vista High	2,124	84%
Phillip Stokoe Elementary	688	84%
Promenade Elementary	667	59%
Rosemary Kennedy Elementary	485	83%
S. Christa McAuliffe Elementary	748	66%
Terrace Elementary	683	88%
Twinhill Elementary	453	84%
Valley View Elementary	563	75%
Wells Middle	898	93%
Ysmael Villegas Middle	1,398	63%
District Totals	18,405	77%

Source: 2018-19 CALPADS report, dated November 9, 2018

Based on the CALPADS data, several schools appear to qualify for this program. The data indicates that 18 schools have a free and reduced-price eligibility rate that exceeds 70%. However, aside from the reduction in paperwork, the district must evaluate the potential revenue impact that each provision will have for each school based on current student meal participation. Under Provision 2, districts are reimbursed for meals served based on the base year percentages established for each meal category of free, reduced, and paid. The district does not collect any funds from students for reduced-price or paid meals because all students are eligible to eat for free. More details about the School Nutrition Program provision options may be found on the CDE website at <https://www.cde.ca.gov/ls/nu/sn/provisions.asp>.

Another claiming method that might be more beneficial to apply at some district schools or districtwide is the Community Eligibility Provision (CEP). The CEP provision was established as a result of the Healthy, Hunger-Free Kids Act of 2010 and allows schools and local educational agencies (LEAs) located in low-income areas to provide free breakfast and lunch to all students. CEP was phased in over a three-year period and became available nationwide July 1, 2014. CEP completely eliminates the traditional paper eligibility applications. Instead, schools are reimbursed through a formula based on the number of identified students, which are those students who qualify for free meals through direct certification including those in foster care, Head Start, are homeless, migrant or living in households that receive Supplemental Nutrition Assistance Program food stamps, Temporary Assistance for Needy Families cash assistance or the Food Distribution Program on Indian Reservations benefits. Because this claiming method eliminates the use of applications, it changes the appearance of free and reduced-price data. Because it considers only identified students for free meals and not those who qualify by income, it creates an appearance that overall free and reduced-price eligibility rates have decreased when in fact they have not.

Schools and LEAs with a minimum identified student percentage that is greater than or equal to 40% in the prior school year may participate in the CEP program. When using this method, the state applies a multiplier of 1.6 to the number of students qualifying through community eligibility for free meals and uses that figure to calculate the reimbursement. For example, in November 2018 the district had 8,859 identified students and total enrollment of 18,433. Therefore, 48.06% of student enrollment is the identified student percentage (ISP). When the ISP is multiplied by 1.6, the district would receive 77% of all breakfasts and lunches served at the free reimbursement rate. The other 23% would be reimbursed at the paid rate.

With this provision, some district schools could receive the higher federal and state free reimbursement rate for 100% of meals served compared to the traditional reimbursement program, for which they receive a lower total reimbursement that is based on meals served by free, reduced, and paid categories. While the intent is to increase participation levels by allowing access to free nutritional meals for all students, in some circumstances, this reimbursement program could increase revenue while feeding the same number of students.

A preliminary calculation for the CEP program using the identified students listed on the November 2018 CALPADS report indicates that the district exceeds the 40% threshold districtwide to participate in the program. The district would have to review the CALPADS data for April 1, 2019 to confirm eligibility for the 2019-20 school year because April data is used for CEP election for the following year.

This program has many advantages. For example, utilization of point-of-sale systems to determine if a student qualifies to receive a free or reduced-price meal or has sufficient money in their account becomes unnecessary. Many districts that participate do not use a computerized system

at CEP schools; only a simple meal count is necessary. Labor hours needed to process meal applications, perform verification tasks and track student participation by eligibility are reduced. Increased student participation is also common because all students eat for free.

Schools electing to participate in a provision claiming method must pay the difference between federal reimbursement and the cost of providing all meals to students at no charge. If the cost to provide the meals is more than the reimbursement received, the funds to pay for this cost differential must be from sources other than federal funds.

In conjunction with the analysis of moving to an alternative reimbursement program, the district must consider the effects on student data collection and reporting used for the Local Control Funding Formula (LCFF). Schools on the CEP may establish a base year for LCFF purposes. Schools using this option to establish a new LCFF base year must collect income data for all eligible students at least once every four years and collect income data for every newly enrolled student in the intervening years. More information regarding verification responsibilities related to LCFF when electing an alternative meal reimbursement program is accessible on the CDE website at: <https://www.cde.ca.gov/fg/aa/lc/lcffffaq.asp>.

Recommendations

The district should:

1. Ensure that food service management staff tracks student participation at all sites, identifies trends, and identifies and determines how to rectify obstacles to increase participation.
2. Process student breakfast meal participation by entering a total count in the point-of-sale system, instead of by individual student.
3. Evaluate reimbursement claiming options Provision 2 and CEP to determine if alternative options result in a favorable reimbursement.
4. Before implementing a provision meal claiming method, review and understand the requirements for student eligibility verification as it relates to the LCFF.

Warehouse and Purchasing

The food service warehouse and delivery system consists of one storekeeper/delivery driver and four delivery driver/stock clerk positions supervised by the child nutrition center manager. All these employees possess a Class B license to operate a commercial vehicle. The storekeeper controls the district's food and supplies inventory utilizing the TrakNOW software system, and the elementary sites order all their products from the central kitchen using this system. The secondary schools order directly from Gold Star Foods, except for paper and cleaning supplies, which are ordered and delivered from the central kitchen. The central kitchen orders fresh fruits and vegetables for the elementary sites, and secondary schools place their own orders. The serving sites receive all orders directly from Sunrise Produce, and Driftwood Dairy delivers milk products to school sites.

The food service warehouse is large and equipped with multilevel racks, but it lacks upkeep. During FCMAT's visit, pallets with product were left on the floor throughout the warehouse. Interviews with staff indicated that the storekeeper/delivery driver is assigned a delivery route to fill in for an absent driver from one to four days per week; therefore, the warehouse is not maintained. Furthermore, most of the delivery trucks require a Class B license driver because the trucks exceed the gross vehicle weight rating of 26,000 pounds. Substitute drivers normally do not possess this commercial endorsement. As discussed in the Management and Oversight section of this report, employee absences are a chronic problem in the department.

Purchasing is an extremely important function in a food service program. The goals of purchasing should be to acquire the best price for needed items and to utilize vendors that provide quality service. The best way to accomplish these goals is through implementation of best practices and procedures for bids and quotes. Some districts have found it advantageous to form food service purchasing cooperatives with other districts to increase purchasing power and decrease the administrative burden of duplicated paperwork. In some cases, the use of a cooperative may not be advisable because of the large geographical distances between participating districts. Piggybacking is another method for procurement of goods and services. It is authorized in Public Contract Code Section 20118 and allows school districts to make purchases using the bid awarded by another public agency or corporation if the board determines it is in the district's best interest. Education Code Section 38083 allows districts to purchase perishable foodstuffs and seasonal commodities needed to operate cafeterias in accordance with the rules and regulations adopted by the governing board, notwithstanding any provisions of the Education Code that conflict with such rules and regulations.

The district is a member of the Super Co-Op purchasing group. The Santa Clarita Valley School Food Services Agency is the lead agency for this cooperative with authority to contract for USDA foods and related services on behalf of member districts. The district is also a member of the Pomona Unified Collaborative purchasing group, and Gold Star Foods is the distributor for both purchasing groups. The district completes its own bid for paper goods, bread, and dry products. For produce, the district piggybacked the Sunrise Produce bid with the Fontana Unified School District; bid pricing is from 2016. The Murrieta Valley Unified School District also extended its piggyback pricing to the district for dairy products and juice.

The storekeeper/delivery driver is responsible for ordering some supplies, such as plastic trays and film for food production packaging equipment, but the child nutrition center manager and food service manager II also share ordering responsibilities. Based on interviews with staff, it is unclear who is ultimately responsible for the procurement process. Interviews also indicated that menu changes are frequently made because product is not available or is not ordered in a timely manner.

Recommendations

The district should:

1. Consider replacing commercial transport trucks with conventional delivery trucks that do not require a Class B license driver, or consider assisting substitute drivers with obtaining a Class B license.
2. Analyze best options to cover for absent delivery drivers and keep the store-keeper in the warehouse.
3. Immediately address the chronic absenteeism of applicable employees.
4. Consider piggybacking for produce items with a more recently awarded bid for potentially better pricing.
5. Develop and implement written procedures that clarify who is responsible for food service procurement.

Facilities and Equipment

During fieldwork, the FCMAT study team visited several of the district's food preparation locations, many of its serving facilities, and the central kitchen and food service warehouse. The study team observed the condition and functionality of the kitchens, serving areas and multipurpose rooms. The cleanliness of each location was satisfactory, and food service staff seemed to take pride in their kitchens and were interested in keeping them in good working order.

The kitchens at several schools are dated, but layout, work space, serving lines and cafeteria eating areas are spacious enough for the food service program's needs. At most schools, staff indicated that the work spaces and kitchen designs are adequate. Several school site kitchens have recently been remodeled with new walk-in refrigerator/freezer units and speed line serving equipment.

During the study team's visit, the kitchen at Norte Vista High School had a water leak in the ceiling over one of the serving lines. Staff indicated that the leak has been an issue for several years when it rains. Because of the leak, staff did not offer the baked potato/salad bar normally offered on Wednesdays and rearranged the flow of student participation with one less speed line.

One of the terms in the 2004 settlement agreement of the Williams v. State of California statewide class action lawsuit requires that every public school provide clean and safe facilities for all students. Each school district must also provide a uniform complaint process for reporting complaints of unsafe or unhealthy facility conditions. The Office of Public School Construction has developed the Facility Inspection Tool (FIT), a school facility conditions evaluation worksheet, for districts to use to determine whether a facility is in good repair, defined as being clean, safe, and functional. The FIT and more information on the Williams Act are available at <https://www.cde.ca.gov/ls/fa/sf/williams.asp>.

Other district food service facilities visited by the study team are adequate, but some showed signs of wear and need modernization. For example, the kitchens at Orrenmaa, McAuliffe, and Collett elementary schools are old and in need of remodel. At Arizona Middle School, students eat breakfast outside when supervision is not available in the multipurpose room, and tables and seating areas are provided immediately outside of the serving kitchen. However, allowing students the option to eat inside or outside may increase student participation and revenue for the food service program, especially on inclement weather days.

The district's central kitchen and warehouse facilities are adequate with plenty of food production and warehouse space. During FCMAT's visit, plenty of pallet positions were open in the dry storage warehouse, and the walk-in refrigerator and freezer had plenty of unutilized space. The department recently discontinued making pizzas from scratch, and the removal of the impinger pizza oven can provide another area to expand food production in the central kitchen. The department has several lidding and overwrapping packaging machines. The addition of a vertical packaging machine suitable for the production of snacks, fruits, and vegetables in plastic film bags could increase the variety of items packaged at the central kitchen for school sites.

Properly maintained kitchen facilities and equipment are essential to a district's food safety program. Arizona Middle, Hillcrest High and Loma Vista Middle schools have relatively new kitchen equipment as the result of recent modernization. Some kitchen equipment at many of the other schools is old but still functioning adequately.

The central kitchen is large and well outfitted with equipment. To generate revenue, the department could consider renting space in the evenings, on weekends and school breaks to other food service entities. Private caterers or small food service businesses may be interested in the use of a commercial kitchen.

Recommendations

The district should:

1. Ensure that the roof at Norte Vista High School is assessed and repaired or replaced immediately.
2. Ensure that the Facility Inspection Tool is used to evaluate the condition of its facilities as required by the Williams Act.
3. Consider making it a priority to remodel the cafeteria production, serving and eating areas at sites that have not yet been modernized, such as Orrenmaa, Collett, and McAuliffe elementary schools, to make the facilities more appealing to students.
4. Consider making the multipurpose room at Arizona Middle School available for students at breakfast.
5. Consider replacing the impinger pizza oven with a vertical packaging machine that is suitable for packaging snacks, fruits and vegetables.
6. Ensure that an equipment replacement and maintenance schedule is developed and implemented.
7. Consider renting central kitchen space to other food service entities when it is not being used by the district.

Competitive Foods

The Healthy, Hunger-Free Kids Act of 2010 specifies that nutrition standards apply to all foods sold outside the school meal programs, on the school campus, and at any time during the school day. These changes are intended to improve the health and well-being of the nation's children, increase consumption of healthful foods during the school day, and create an environment that reinforces the development of healthy eating habits. The standards for food and beverages are minimum standards that local educational agencies, school food authorities and schools are required to meet.

Competitive foods and beverages are those sold at school sites outside of and in competition with the federally reimbursable meal programs. Examples of competitive foods and beverages include those sold during the school day in student stores, a la carte items sold by the food service department, and items sold at fundraisers. More detailed information can be found at <http://www.cde.ca.gov/ls/nu/he/compfoods.asp>. Quick reference cards that concisely outline the foods allowed and the food sale regulations for schools can be found in the appendix of this report and at <https://www.cde.ca.gov/ls/nu/he/documents/compfoodrefcard.doc>. It would benefit the district to add CDE's quick reference cards to its wellness information on the Child Nutrition Services Department website and to provide them to school offices, student clubs and parent-teacher associations. The department website is well done and provides much information, and this would be a good addition.

In addition to complying with nutritional requirements such as fat, calorie, sugar, whole grain, and sodium limits, student organizations at middle and high schools must comply with the following regulations (California Code of Regulations Title 5 Section 15501):

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

These rules must be followed on school campuses from midnight until 30 minutes after the end of the school day. This includes vending machines being locked.

During staff interviews and in site observations, the study team was made aware that some high schools do not meet regulations with student store sales. The team visited the student store at Norte Vista High School during the lunch period and found that the store offered a large variety of snacks and beverages, considerably more than three types of foods. The store had a variety of chips, corn nuts, Pop Tarts, Rice Krispy treats, jerky, fruit roll-ups, juice bars, ice cream, Powerade, water, and juices, and students were baking cookies (which is considered on-site preparation). The store sold many of the same foods as the food service program. The teacher at

the store indicated that daily income is \$200-\$300. The food service program's a la carte sales for October 2018 averaged \$134 per day, and the student store likely affects these sales.

The teacher showed the study team a notebook that listed the nutritional analysis for the products sold. She stated that all the items are tested in the Smart Snack Calculator located on the Child Nutrition Services Department website. This calculator is from the USDA and determines if nutritional information on product labels meet the regulations for food sales. The instructor was aware of the nutritional guidelines, but did not seem to be aware of the limit on the number of items that can be sold and that the student store cannot sell items also offered by food service. A copy of CDE's quick reference card with food sale regulations was in the front of the notebook; therefore, it appears that guidance has been provided to schools. The district's Student Wellness Policy and board policy and administrative regulations regarding competitive foods address the regulations; however, sites do not fully understand them and/or there is a lack of oversight regarding competitive food sales. Staff indicated there were similar issues with student stores on the other high school campuses.

Although the study team was not made aware of any other areas of noncompliance with competitive foods regulations, such as those for fundraisers, there could be some that food service and district staff do not know about. Failure to abide by competitive food sales requirements may result in the state withholding federal and state meal reimbursements, even when school sites and not the Child Nutrition Services Department cause violations. It is vital that the district educate staff and students about these issues and enforce the requirements.

The nutrition specialist is the co-coordinator of the district Wellness Committee, and competitive food sales should be an item that she routinely discusses with site administrators and reviews at least annually in Wellness Committee meetings. Parents, students and staff at all schools should be regularly reminded about the requirements for food sales. Board Policy 5030, Student Wellness, states that the public shall be informed about the content and implementation of the district's wellness policy on an annual basis.

Recommendations

The district should:

1. Review competitive food sale regulations with all site staff and students and ensure that all groups follow them.
2. Ensure that site administrators and child nutrition management staff monitor food sales to ensure compliance.
3. Ensure that student stores comply with regulations regarding the number of items that can be sold, that items sold cannot be the same as the food service program, and that food cannot be prepared (including baking cookies) on campus.
4. Add CDE's quick reference cards to the Child Nutrition Services Department website and make them readily available to school sites, student clubs and parent-teacher associations.

5. Review the Student Wellness Policy, including competitive food sale compliance annually with sites and the public.
6. Ensure food service management staff routinely discusses competitive food sale regulations with site administrators and at Wellness Committee meetings.

Wellness Program

A local school wellness policy is a written document that guides the school district's efforts to establish a school environment that promotes students' health, well-being, and ability to learn. 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 Final Rule specified new requirements for wellness policies. On July 29, 2016, the USDA Food and Nutrition Service finalized additional regulations for LEAs to create a framework and guidelines for written wellness policies. The regulations established minimum content requirements for local school wellness policies. They are to ensure stakeholder participation in the development and updates of such policies, periodically assess and disclose the LEAs' compliance, and increase transparency for the public regarding school wellness policies and contribute to integrity in the school nutrition program. The revised LEA policy was to be in place by June 30, 2017.

The district's Board Policy 5030, Student Wellness, was amended on March 15, 2018 and contains all required elements. Interviews with staff and documents provided to FCMAT indicate that the district strives to demonstrate its commitment to wellness. The district has an active Wellness Committee, and reports from the Committee document active involvement, identified goals and progress toward those goals. The Wellness Committee membership and activities satisfied the requirements of the January 2018 CDE Administrative Review.

Interviews indicated that one of the nutrition specialist's main priorities is wellness activities. The nutrition specialist spends a great deal of time on these efforts and has set the Wellness Program on the way to continued success. However, as discussed in the Management and Oversight section of this report, the top priorities of this position should include daily meal service, menu acceptance, program compliance and other supervisory duties in the Child Nutrition Services Department.

Recommendation

The district should:

1. Evaluate the amount of time the nutrition specialist spends on wellness activities outside of the meal program, and ensure this position's top priorities are supervisory duties in the Child Nutrition Services Department.

Training and Professional Development

All food service personnel need to receive regular ongoing training to understand and perform their jobs. The USDA has established minimum training requirements for school food service personnel. These requirements became effective on July 1, 2015, and mandate professional standards and annual training requirements for child nutrition directors, managers, and staff. The annual training hours required varies with each position and/or the number of hours worked. Training needs to be documented and is evaluated during state administrative reviews. Information about this mandate and training resources can be found at <https://www.cde.ca.gov/ls/nu/pd-psbyposition.asp>.

The district has well-developed and well-documented training plans and procedures, as evidenced by meeting agendas and individual training records. The district tracks each employee's continuing education hours as required by USDA.

In addition to getting the initial food handler certificate, which is required by Riverside County, all food service employees are encouraged by the district to take the extensive food safety manager certification course (ServSafe or equivalent) regardless of the requirements for their position. The district offers this course periodically throughout the year. Site leads have monthly group meetings with child nutrition management staff, and central kitchen staff have a short weekly meeting with the child nutrition center manager.

The study team's school site observations indicated that more training is needed on the offer versus serve requirements. Some of the site staff were unfamiliar with the term. As indicated elsewhere in this report, training is also needed regarding more efficient work methods in the central kitchen, particularly on the assembly lines.

Riverside County and the Child Nutrition Services Department require that substitutes have a food handler certificate to work in the kitchens. Either the operations supervisor or the assistant to the director generally review the department's orientation manual and basics of kitchen and food safety with substitutes prior to their assignment. On some occasions, the Human Resources Department has reportedly sent substitutes to school sites without the knowledge of the operations supervisor and without proper orientation to the department. This practice puts extra strain on the other site staff. In addition, assigning a substitute to prepare, handle and serve food without any training other than a food handler certificate could create an unsafe condition for staff and students.

Recommendations

The district should:

1. Continue to train and remind staff regarding offer versus serve regulations.
2. Train central kitchen staff on more efficient work methods.
3. Ensure that the operations supervisor is notified of all new substitutes and that they are provided with an orientation and appropriate training before assignment in a kitchen.

Appendices

Appendix A

Meals per Labor Hour Analysis

ALVORD UNIFIED SCHOOL DISTRICT
Meals Per Labor Hour - October 2018

SCHOOLS	Elementary Schools														Elem Total
	Albina**	Collett**	Foothill	La Granda**	Lake Hills	McAllister	Myra-Linn**	Oreman	Promenade	RMK	Stoke**	Terrace*	Twihill*	Valley View	Bryant Park*
Meals															
Total Breakfasts	11,137	4,325	3,349	3,709	3,690	3,182	4,037	1,445	2,431	3,909	4,311	12,649	9,186	2,837	267
Breakfast/Day	484	188	146	160	158	138	176	63	106	170	187	559	399	123	12
Breakfast Participation/Enrollment	94%	33%	26%	26%	22%	18%	34%	11%	16%	35%	27%	82%	88%	22%	37%
Breakfast Equivalents (0.5)	242	94	73	81	80	69	88	31	53	85	94	279	200	62	6
Total Lunches	11,262	10,627	11,076	12,122	7,471	9,547	9,774	7,797	8,043	7,581	13,084	12,110	8,013	9,056	268
Lunches/Day	490	462	482	527	325	415	425	359	350	330	569	535	348	394	12
Lunch Participation/Enrollment	95%	80%	86%	84%	44%	55%	81%	61%	52%	68%	83%	78%	77%	70%	72%
Total Breakfast & Lunch/Day	732	556	554	608	405	484	513	370	403	415	663	815	548	465	18
Total After-school Snacks	2,042	2,400	2,339	2,316	0	2,105	1,685	2,438	0	1,934	1,978	2,239	1,971	1,842	0
Snack Equivalent/Day (0.33)	29	34	34	33	0	30	24	35	0	28	28	32	28	26	0
Total Suppers	1,298	1,619	1,212	1,722	0	647	1,331	1,535	0	1,046	1,328	1,459	1,081	955	0
Supper Equivalents/Day (0.5)	28	35	26	37	0	14	29	33	0	23	29	32	24	21	0
Total Meal Equivalents	789	626	614	678	405	529	566	439	403	465	720	878	600	903	18
Labor Hours															
Site Labor Hours	14.00	9.00	8.25	10.75	8.00	9.00	9.25	7.75	7.50	9.25	8.50	14.00	12.50	9.00	0.00
Central Kitchen Hours	15.42	14.41	12.06	12.43	6.76	9.35	11.19	9.24	6.69	8.47	15.27	16.28	11.19	9.22	0.74
Total Labor Hours	29.42	23.41	20.31	23.18	14.76	18.35	20.44	16.99	14.19	17.72	23.77	30.28	23.69	18.22	0.74
Meals per Labor Hour (MPLH)	27	27	27	28	27	29	28	26	28	26	29	29	25	28	28

Enrollment**

Free/Reduced Students**

% Free/Reduced Students

SCHOOLS	Secondary Schools										Elementary		District Totals
	Albina	Loma Vista	Village	Wells	Hillcrest	La Sierra	North Vista	Alford Cont	Alford Alt	Secondary Totals	Elementary Totals		
Meals													
	Total Breakfasts	2,768	6,508	4,686	6,155	4,977	8,862	8,915	425	388	43,684	70,664	114,348
	Breakfasts/Day	120	283	204	268	216	385	388	18	17	1,899	3,072	4,972
	Breakfast Participation/Enrollment	13%	29%	15%	30%	13%	22%	18%	11%	10%	17%	37%	27%
	Breakfast Equivalents	120	283	204	268	216	385	388	18	17	1,899	1,536	3,435
	Total Lunches	11,722	16,947	15,013	16,937	14,390	18,452	27,535	1,854	1,912	124,762	138,031	262,793
	Lunches/Day	510	737	653	738	626	802	1,197	81	83	5,424	6,001	11,426
	Lunch Participation/Enrollment	56%	74%	47%	82%	38%	47%	56%	48%	51%	54%	72%	62%
	Total Breakfast & Lunch/Day	630	1,020	856	1,004	842	1,188	1,585	99	100	7,324	7,538	14,862
	A la Carte \$	\$4,289	\$3,591	\$6,755	\$4,063	\$2,908	\$2,027	\$3,074	\$0	\$0	\$26,707	\$0	\$26,707
	A la Carte \$/Day	\$186	\$156	\$294	\$177	\$126	\$88	\$134	\$0	\$0	\$1,161	\$0	\$1,161
	A la Carte Equivalents/Day (\$2.50)	75	62	117	71	51	35	53	0	0	464	0	464
	Total After-school Snacks	1,979	3,019	2,514	1,785	0	0	0	0	0	9,297	25,289	34,586
	Snack Equivalents/Day (0.33)	28	43	36	26	0	0	0	0	0	133	363	496
	Total Suppers	1,272	1,333	1,346	1,376	0	0	0	0	0	5,327	15,233	20,560
Supper Equivalents/Day (0.5)	28	29	29	30	0	0	0	0	0	116	331	447	
Total Meal Equivalents	761	1,155	1,039	1,130	893	1,233	1,638	99	100	8,037	8,232	16,269	
Labor Hours													
	Site Labor Hours	30.00	37.00	34.00	37.00	44.00	51.00	57.00	4.00	3.50	297.50	136.75	434.25
	Central Kitchen Hours	2.69	4.26	4.44	3.95	1.68	2.99	4.25	4.04	3.98	32.38	158.72	191.00
	Total Labor Hours	32.69	41.26	38.44	40.95	45.68	53.99	61.25	8.04	7.48	329.78	295.47	625.25
	Meals Per Labor Hour (MPLH)	23	28	27	28	20	23	27	12	13	24	28	26

Enrollment**

Free/Reduced Students**

% Free/Reduced Students

Sources: **2018-19 CALPADS 1.17 Report, November 9, 2018

October 2018 SNP and CACFP claims

Alford USD Receipts & Collections Summary

Alford USD Central Production Kitchen Food Distribution Totals and Work Hours by Site spreadsheets

*Meal counts include Head Start

*Breakfast in the classroom

Rounding used in calculations

Appendix B

Quick Reference Cards – Competitive Foods

QUICK REFERENCE CARDS

NON-CHARTER PUBLIC SCHOOLS

ELEMENTARY SCHOOL-FOOD RESTRICTIONS

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

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

Effective from midnight to one-half hour after the end of the official school day.

Applies to ALL foods sold to students by any entity.

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

Compliant foods

Must meet one of the following general food standards:

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

AND must meet the following nutrition standards:

- ≤ 35% calories from fat (except nuts, seeds, reduced-fat cheese or part skim mozzarella, dried fruit and nut/seed combo, fruit, non-fried vegetables, seafood), **and**
- < 10% calories from saturated fat (except nuts, seeds, reduced-fat cheese or part skim mozzarella, dried fruit and nut/seed combo), **and**
- ≤ 35% sugar by weight (except fruit**, non-fried vegetables, dried fruit and nut/seed combo), **and**
- < 0.5 grams trans fat per serving (no exceptions), **and**
- ≤ 200 milligrams sodium per item/container (no exceptions), **and**
- ≤ 200 calories per item/container (no exceptions)

Paired foods:

- If exempt food(s) are combined with nonexempt food(s) or added fat/sugar they must meet ALL nutrition standards above.
- If two foods exempt from one or more of the nutrition standards are paired together and sold as a single item, the item must meet for trans fat, sodium, and calories.

* A whole grain item contains:

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

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

CHECK YOUR DISTRICT'S WELLNESS POLICY FOR STRICTER RULES.

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

ELEMENTARY SCHOOL-BEVERAGE RESTRICTIONS

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

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

Effective from midnight to one-half hour after the end of the official school day.

Applies to ALL beverages sold to students by any entity.

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

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

Compliant beverages:

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

All beverages must be caffeine-free (trace amounts are allowable).

ELEMENTARY SCHOOL-STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15500

Student organization is defined as a group of students that are NOT associated with the curricula or academics of the school or district.

Effective from midnight to one-half hour after the end of the official school day.

Student organization sales must comply with all food and beverage standards AND all of the following:

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

QUICK REFERENCE CARDS

MIDDLE/HIGH SCHOOL-FOOD RESTRICTIONS

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

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

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

Effective from midnight to one-half hour after the end of the official school day.

Applies to ALL foods sold to students by any entity.

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

"Snack" foods must meet one of the following general food standards:

- Be a fruit, vegetable, dairy, protein, or whole grain item* (or have one of these as the first ingredient), or
 - Be a combination food containing at least $\frac{1}{4}$ cup fruit or vegetable.
- AND must meet the following nutrition standards:**
- $\leq 35\%$ calories from fat (except nuts, seeds, reduced-fat cheese or part skim mozzarella, dried fruit and nut/seed combo, fruit, non-fried vegetables, seafood), **and**
 - $< 10\%$ calories from saturated fat (except nuts, seeds, reduced-fat cheese or part skim mozzarella, dried fruit and nut/seed combo), **and**
 - $\leq 35\%$ sugar by weight (except fruit**, non-fried vegetables, dried fruit and nut/seed combo), **and**
 - < 0.5 grams trans fat per serving (no exceptions), **and**
 - ≤ 200 milligrams sodium per item/container (no exceptions), **and**
 - ≤ 200 calories per item/container (no exceptions)

Paired foods:

- If exempt food(s) are combined with nonexempt food(s) or added fat/sugar they must meet ALL nutrition standards above.
- If two foods exempt from one or more of the nutrition standards are paired together and sold as a single item, the item must meet for trans fat, sodium, and calories.

"Entrée" foods must be intended as the main dish and be a:

- Meat/meat alternate and whole grain rich food, **or**
- Meat/meat alternate and fruit or non-fried vegetable, **or**
- Meat/meat alternate alone (cannot be yogurt, cheese, nuts, seeds, or meat snacks = these are considered a "snack" food).

AND

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

- ≤ 400 calories, **and**
- $\leq 35\%$ calories from fat
- < 0.5 grams trans fat per serving

A competitive entrée **sold by Food Service if NOT on the menu the day of or day after or any other entity (PTA, student organization, etc.)** must meet one of the following general food standards:

- Be a fruit, vegetable, dairy, protein, or whole grain item (or have one of these as the first ingredient), **or**
- Be a combination food containing at least $\frac{1}{4}$ cup fruit or vegetable

AND meet the following nutrition standards:

- $\leq 35\%$ calories from fat, **and**
- $< 10\%$ calories from saturated fat, **and**
- $\leq 35\%$ sugar by weight, **and**
- < 0.5 grams trans fat per serving, **and**
- ≤ 480 milligrams sodium, **and**
- ≤ 350 calories

* A whole grain item contains:

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

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

CHECK YOUR DISTRICT'S WELLNESS POLICY FOR STRICTER RULES.

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

California Department of Education, Nutrition Services Division

NON-CHARTER PUBLIC SCHOOLS**MIDDLE/HIGH SCHOOL-BEVERAGE RESTRICTIONS**

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

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

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

Effective from midnight to one-half hour after the end of the official school day.

Applies to ALL beverages sold to students by any entity.

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

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

Compliant beverages:

1. Fruit or Vegetable juice:
 - a. $\geq 50\%$ juice **and**
 - b. No added sweeteners
 - c. ≤ 12 fl. oz. serving size
2. Milk:
 - a. Cow's or goat's milk, **and**
 - b. 1% (unflavored), nonfat (flavored, unflavored), **and**
 - c. Contains Vitamins A & D, **and**
 - d. $\geq 25\%$ of the calcium Daily Value per 8 fl. oz., **and**
 - e. ≤ 28 grams of total sugar per 8 fl. oz.
 - f. ≤ 12 fl. oz. serving size
3. Non-dairy milk:
 - a. Nutritionally equivalent to milk (see 7 *CFR* 210.10(d)(3), 220.8(i)(3)), **and**
 - b. ≤ 28 grams of total sugar per 8 fl. oz., **and**
 - c. ≤ 5 grams fat per 8 fl. oz.
 - d. ≤ 12 fl. oz. serving size
4. Water:
 - a. No added sweeteners
 - b. No serving size limit
5. Electrolyte Replacement Beverages (**HIGH SCHOOLS ONLY**)
 - a. Must be either ≤ 5 calories/8 fl. oz. (no calorie) OR ≤ 40 calories/8 fl. oz. (low calorie)
 - b. Water as first ingredient
 - c. ≤ 16.8 grams added sweetener/8 fl. oz.
 - d. 10-150 mg sodium/8 fl. oz.
 - e. 10-90 mg potassium/8 fl. oz.
 - f. No added caffeine
 - g. ≤ 20 fl. oz. serving size (no calorie) OR ≤ 12 fl. oz. serving size (low calorie)
6. Flavored Water (**HIGH SCHOOLS ONLY**)
 - a. Must be either ≤ 5 calories/8 fl. oz. (no calorie) OR ≤ 40 calories/8 fl. oz. (low calorie)
 - b. No added sweetener
 - c. No added caffeine
 - d. ≤ 20 fl. oz. serving size (no calorie) OR ≤ 12 fl. oz. serving size (low calorie)

All beverages must be caffeine-free (trace amounts are allowable).

MIDDLE/HIGH SCHOOL-STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15501

Student organization is defined as a group of students that are NOT associated with the curricula or academics of the school or district.

Effective from midnight to one-half hour after the end of the official school day.

Student organization sales must comply with all food and beverage standards **AND all** of the following:

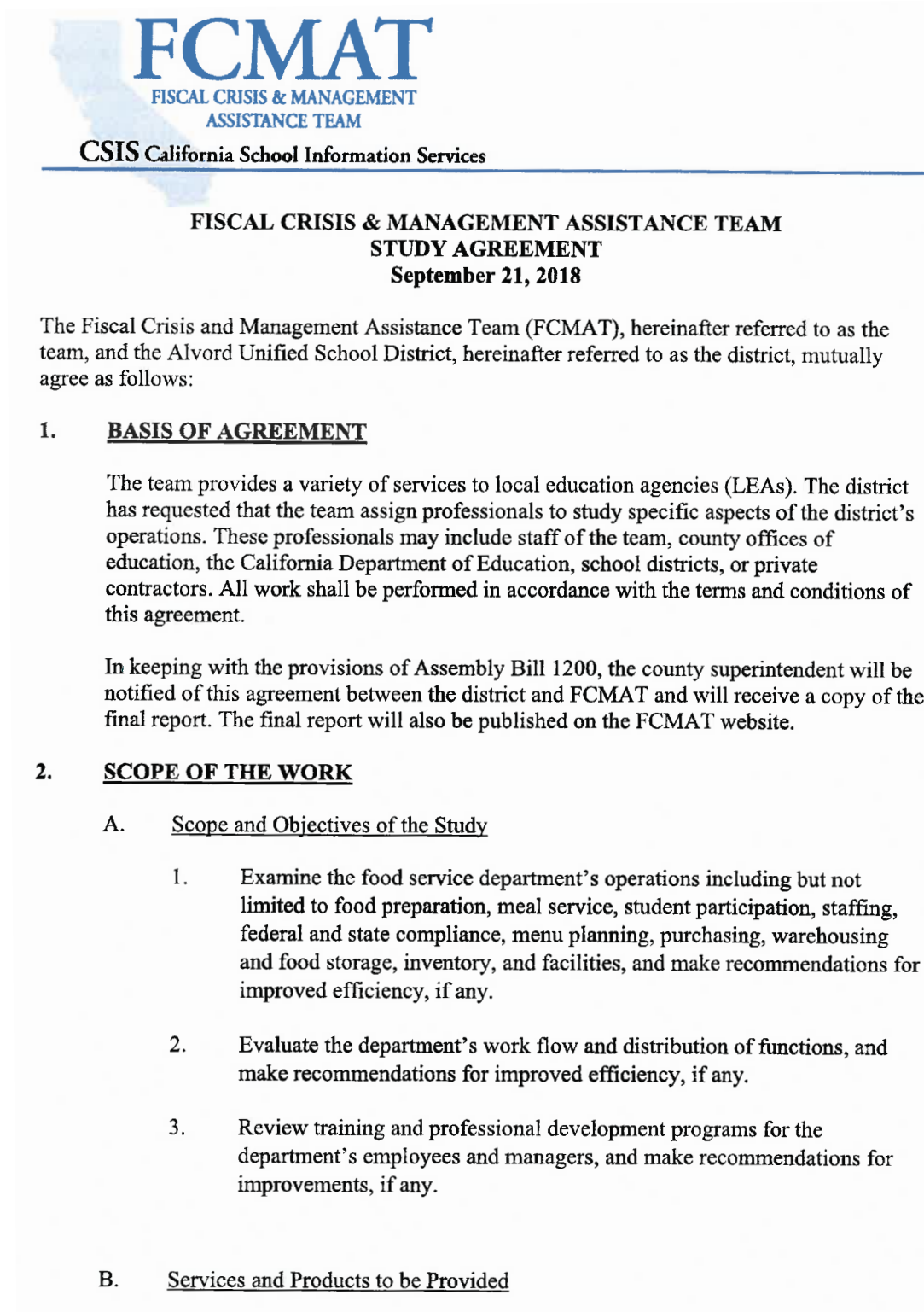
1. Up to **three categories** of foods or beverages *may* be sold each day (e.g., chips, sandwiches, juices, etc.).
2. Food or beverage item(s) must be **pre-approved** by the governing board of the school district.
3. Only **one student organization** is allowed to sell each day.
4. Food(s) or beverage(s)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

EFFECTIVE 1/1/2017

Revised 1/1/2017

Appendix C

Study Agreement



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

3. PROJECT PERSONNEL

The FCMAT study team may also include:

<i>A. To be determined</i>	<i>FCMAT Staff</i>
<i>B. To be determined</i>	<i>FCMAT Consultant</i>
<i>C. To be determined</i>	<i>FCMAT Consultant</i>
<i>D. 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. \$800 per day for each staff member while on site, conducting fieldwork at other locations, presenting reports or 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 \$35,600.

- 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 Alvord Unified School District named as additional insured, indicating applicable insurance coverages upon request prior to the commencement of on-site work.

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: Susana Lopez
 Telephone: (951) 509-5000
 E-mail: susana.lopez@alvordschools.org

 9-21-18

 Allan Mucerino, Superintendent Date
 Alvord Unified School District

 September 6, 2018

 Michael H. Fine, Date
 Chief Executive Officer
 Fiscal Crisis and Management Assistance Team