



FCMAT

FISCAL CRISIS & MANAGEMENT
ASSISTANCE TEAM

CSIS California School Information Services

Napa Valley Unified School District

Food Service Review

February 8, 2017



Joel D. Montero
Chief Executive Officer







CSIS California School Information Services

February 8, 2017

Patrick Sweeney, Ed.D., Superintendent
Napa Valley Unified School District
2425 Jefferson Street
Napa, CA 94558

Dear Superintendent Sweeney:

In May 2016, the Napa Valley Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement for management assistance. Specifically, the agreement states that FCMAT will perform the following:

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

This final report contains the study team's findings and recommendations in the above areas of review. FCMAT appreciates the opportunity to serve the Napa Valley Unified School District and extends thanks to its staff for their cooperation and assistance during this review.

Sincerely,

Joel D. Montero
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

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About FCMAT

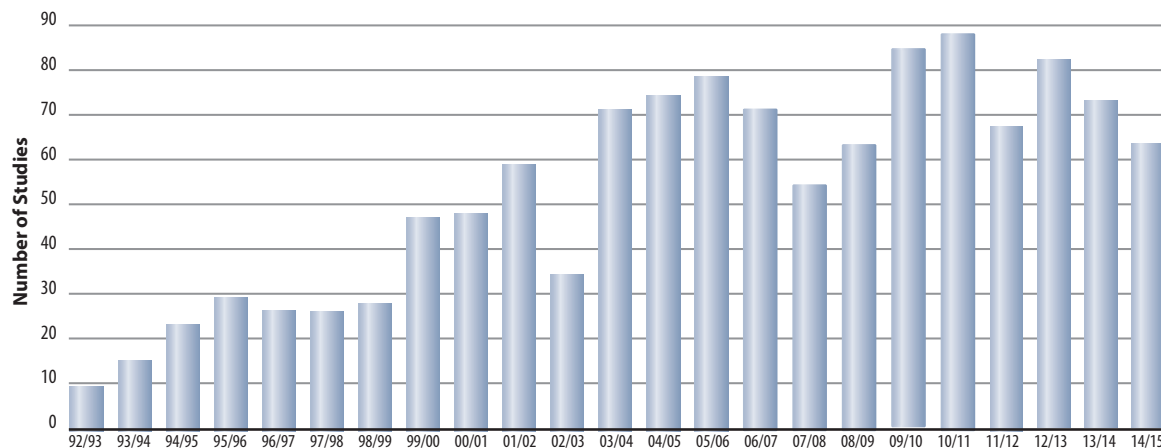
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related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

Introduction

Background

Located in Napa County, the Napa Valley Unified School District has a seven-member governing board and serves the communities of American Canyon, Napa and Yountville. The district serves approximately 17,951 TK-12 students at 19 elementary, five middle, three comprehensive high, one continuation high, and two alternative high schools. The district also offers an independent study program and has authorized one direct-funded charter school. According to data from the California Department of Education (CDE), student enrollment has increased from 15,704 in 1996-97 to a peak of 18,610 in 2014-15. However, enrollment began to decline in 2015-16.

The district participates in the National School Lunch and Breakfast programs; lunch is offered at all district schools and breakfast is offered at most of the schools. CDE records indicate that the district's free and reduced-price meal eligibility increased from 43.8% in 2012-13 to 48.4% in 2015-16. Information provided by the district for October 2016 shows an eligibility of 47.3%. There is a wide variation in eligibility among the district's schools, from a high of 87.7% at Shearer Elementary to a low of 13% at Vichy Elementary School.

In May 2016, the Napa Valley Unified School 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 Food Service Department.

Study and Report Guidelines

FCMAT visited the district on September 20-23, 2016 to conduct interviews, collect data, observe the food service operations and facilities, and begin reviewing documents. This report is the result of those activities and is divided into the following sections:

- Executive Summary
- Department Overview
- Budget
- Staffing and Meals per Labor Hour
- Meal Program, Menus, Preparation and Service
- Participation
- Meal Count Compliance
- Paid Student Meal Collection Procedures
- Direct Certification
- Wellness Policy
- Competitive Food Sales
- Facilities and Equipment
- State Administrative Review
- Staff Training
- Appendices

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

Study Team

The study team was composed of the following members:

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

Executive Summary

Department Overview and Budget

The district contracts with Sodexo America, LLC to oversee its Food Service Department. Sodexo serves in a consulting role to the department but has a limited role regarding staffing issues. The district has contracted with Sodexo for many years but is considering whether or not to continue with a management company or operate an independent, district-run program. Regardless of that decision, the district should consider hiring a director of food services to oversee the Food Service Department because it has only one management position, and this organizational structure does not provide for adequate oversight of the department.

If the district were to operate an independent program, many of the costs incurred from the management company would be transferred to district food and labor expenses. There would also be some additional equipment expenses. Absorbing these responsibilities and costs may be attainable but would take considerable effort and forethought to achieve successfully. Total costs may or may not decrease, and it is likely that food costs will be higher and extra positions will be needed to perform management and nutritional aspects of the program. The district should carefully analyze these issues before making a change.

The district's cafeteria fund budget shows that since 2013-14, expenses have exceeded revenues each year, which has required a contribution from the unrestricted general fund beginning in 2014-15. The 2016-17 budget projections show that revenue and expense totals are identical, which is likely not realistic. The budget should be reviewed and updated as necessary to provide realistic projections. To reverse the budget trends of deficit spending and unrestricted general fund contributions, the district must seek ways to reduce expenses and/or increase revenue to regain and maintain financial solvency in the cafeteria fund.

Staffing and Meals per Labor Hour

Meals per labor hour (MPLH) is a standard formula used to measure staff efficiency and help determine the appropriate staffing levels in a food service operation. Best practice standards are 30 MPLH for school food service; however, the analysis completed by FCMAT for September 2016 shows that the overall district average was 16 MPLH. A prudent goal for labor expenses is 40%-45% of revenue, but the district's financial reports indicate that the costs have ranged from 51%-57% since 2013-14. Student participation and MPLH should be monitored closely by the district and methods to increase participation should be implemented. If student participation is not increased, labor hours should be reduced.

At the time of FCMAT's fieldwork, the district was planning to move some of the central kitchen responsibilities from Ridgeview to middle school and high school sites. These plans would involve changes in equipment, transport trucks and staffing, and should be thoroughly analyzed and evaluated prior to implementation.

Menus and serving line practices need to be simplified so preparation, delivery and meal service can be streamlined and require fewer staff hours. For example, serving three hot entrées at the elementary schools is likely too many considering the amount of time required to prepare and serve them. Consideration should also be given to implementing personal identification number (PIN) pads at elementary schools.

Meal Program, Menus, Preparation, Service and Participation

The district's menus are nutritionally adequate and acceptable under federal regulations. School districts throughout the state and nation are struggling with balancing the requirements of the federal regulations and parent requests with the revenue provided by federal and state meal reimbursements. In addition, to encourage and maintain student participation all menus must be written with student acceptance in mind. Student participation in the meal program is vital and students' favorite items such as whole grain lean pepperoni pizza and chocolate milk should be added to the lunch menu to increase participation. The district should also analyze options, such as offering breakfast at midmorning break at sites where it is cost effective to do so, to increase participation.

The food service menu should be written, printed and published to better highlight the nutritious products that are offered. For many parents and students, the menu is their only source of information about the food service program and they are often not aware of the variety of fruits and vegetables offered daily or the USDA's requirements for the nutritious products that must be used in food service programs.

Meal Count Compliance

To meet the federal requirements for meal count compliance, the district should rearrange staff so that a cashier is placed at the end of each serving line to ensure that each student has taken a complete meal and to verify student identification. The district should also update its meal counting and claiming documents to match current practices and ensure that a separate document is completed for each site that has different procedures.

Paid Student Meal Collection Procedures

Unpaid student meal charges were high at the end of 2015-16 and reportedly had been higher in previous years. The district has had some success this year in working with parents to reduce large negative balances using the new point of sale (POS) software system and implementing negative balance policies. However, the district's negative balance policies are liberal, and consideration should be given to decreasing the number of meals that can be charged.

Direct Certification

Direct certification is the federally mandated process that school nutrition programs must use to certify school-age recipients of CalFresh and CalWORKs benefits as eligible for free school meals without completing an application. The Food Service Department does not complete the direct certification process until well after school starts each year because the information is not provided by the technology department staff until October of each year. This process should be completed at least one month prior to the start of school to prevent the unnecessary processing of applications for free and reduced-price meals.

Wellness Policy

The district has an active Wellness Committee, which has subcommittees that concentrate on certain aspects of the wellness policy. The food subcommittee has been active in trying to change the district's food service menu to reflect the subcommittee's preferences. It is good to gather input and listen to opinions; however, the committee and/or subcommittees should not be able to dictate changes that can negatively affect participation, revenue or expenses in the cafeteria program. Decisions about menu offerings and program management should be based on student preferences, program regulations and fiscal solvency.

Competitive Food Sales

Site staff and food service staff indicated that schools are not always abiding by the competitive food sales regulations for fundraising activities. Additionally, the Silverado Middle School student store is run by the parent teacher organization, which is not allowed by the California Code of Regulations, Title 5, Section 15501. The district should educate staff, students and parents about competitive foods sales laws, regulations and policies, and ensure that all groups follow them.

Staff Training

Food service staff members need to receive regular training to be able to understand and perform their jobs and follow regulations, and the responsibilities for staff training in the district need to be reviewed and clarified. The study team observed issues such as students not taking complete meals and the lack of proper student identification at the point of sale. Food service management staff should routinely visit sites and monitor the program for compliance. Training is essential, and the USDA has established minimum education and training requirements for food service personnel.

Findings and Recommendations

Department Overview

The district contracts with Sodexo America, LLC, a food service management company, to oversee its Food Service Department. The company serves in a consulting role to the department. Sodexo prepares the menus, purchases all food and food related paper goods and charges the district a fixed rate. It is responsible for the nutritional analysis of meals, recipes, training materials and program oversight. However, per Education Code Section 45103.5, management companies have a limited role regarding district personnel; they may consult with district management regarding staff but may not supervise classified staff. Therefore, Sodexo is not allowed to be involved in personnel management related to supervision and evaluation.

The Food Service Department has only one management employee, the food and nutrition operations assistant. There is no director or overall department manager position. This organizational structure does not provide adequate oversight for the department. The district has contracted with Sodexo for three decades but is considering whether or not to continue with a management company. Regardless of that decision the district should consider hiring a director to oversee the department. This will affect labor expenses, but an effective director should be able to find ways to increase revenue and eliminate any unnecessary costs.

Staff evaluations in the Food Service Department have been completed by site leads that were previously classified as supervisory staff but have recently become part of the California School Employees Association's (CSEA's) bargaining unit and were reclassified to non-supervisory employees. The district needs to change its employee evaluation process and reassign the responsibility to a management/supervisory employee, such as the food and nutrition operations assistant. Input for staff evaluations can be provided by the site leads, but a management/supervisory employee needs to complete the evaluations.

The district uses the California School Boards Association's Gamut online policy service. At the time of FCMAT's fieldwork, some of the district's board policies and administrative regulations pertaining to food service were outdated. For example, Board Policy 3550, Food Service/Child Nutrition Program and the accompanying Administrative Regulation 3550 were revised in June 2006 and November 2006, respectively. There have been changes to federal and state laws and regulations and to the district's food service program operations and procedures since these items were revised. Following FCMAT's fieldwork, district staff indicated that the district was in the process of reviewing and revising some of its board policies and administrative regulations.

Recommendations

The district should:

1. Consider hiring a director of food service.
2. Ensure that a management/supervisory employee completes staff evaluations.
3. Continue its review of board policies and administrative regulations pertaining to food service, and revise them as necessary. Routinely review the policies and regulations to ensure they are kept current.

Budget

Ideally, a district food service program should be self-sustaining. Revenue should fund department expenses, including indirect costs, with appropriate reserves maintained. However, a review of the district's cafeteria fund budget from 2012-13 through 2016-17 shows that since 2013-14 expenses have exceeded revenues each year, also known as deficit spending.

Additionally, indirect costs were not charged to the fund until 2014-15, which skewed the expenses and the deficit. 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 indirect costs are not budgeted and charged to the cafeteria fund. The California School Accounting Manual provides guidelines for allowable indirect cost amounts and how to calculate them. Even in a deficit spending situation, the district should charge indirect costs to the cafeteria fund because they are legitimate responsibilities of the program.

In 2012-13 the fund balance showed a gain of \$136,028, which would have been reduced significantly and may have been a deficit if indirect costs were charged. Since 2013-14 the fund balance has continued to be depleted, and an unrestricted general fund contribution was required beginning in 2014-15. The district needs to increase revenue and/or reduce expenditures to reverse the current trends.

The current year budget projections show an expenditure decrease of \$349,823 and a revenue decrease of \$122,282. However, the budget does not appear to be realistic because the projected totals for revenue and expenses are identical.

Cafeteria Budget Trends

	2012-13 Audit Report	2013-14 Unaudited Actuals	2014-15 Unaudited Actuals	2015-16 Unaudited Actuals	2016-17 Adopted Budget
Beginning Fund Balance	248,526	384,554	319,758	77,194	18
Total Revenues	5,770,904	5,466,379	5,208,356	5,476,680	5,354,398
Revenue Change		-304,525	-258,023	268,324	-122,282
Revenue Change %		-5%	-5%	5%	-2%
Salaries	2,029,374	2,159,670	2,308,631	2,385,166	2,286,913
Benefits	594,961	617,883	653,522	660,841	680,374
Total Salaries and Benefits	2,624,335	2,777,553	2,962,153	3,046,007	2,967,287
Salaries/Benefits % of Revenue	45%	51%	57%	56%	55%
Food and Supplies	13,124	16,449	88,031	178,972	120,172
Food/Supplies % Revenue *	-	-	-	-	-
Services and Other Operating	2,997,417	2,737,918	2,386,538	2,299,954	2,126,539
Capital Outlay	0	0	91,925	0	0
Indirect Costs	-	-	177,891	179,288	140,400
Total Expenditures	5,634,876	5,531,921	5,706,539	5,704,221	5,354,398
Excess (Deficiency)	136,028	(65,542)	(498,183)	(227,541)	0

	2012-13 Audit Report	2013-14 Unaudited Actuals	2014-15 Unaudited Actuals	2015-16 Unaudited Actuals	2016-17 Adopted Budget
Interfund Transfer In	0	1,242	255,619	145,862	0
Audit Adjustments/Restatements	0	(496)	0	4,503	0
Ending Fund Balance	384,554	319,758	77,194	18	18
Enrollment	18,326	18,497	18,610	18,479	17,951
Free and Reduced Eligibility	43.8%	45.3%	44.9%	48.4%	47.3%

*Food/supplies % of revenue not available due to inclusion in Sodexo's fixed fee.

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

Current year enrollment and free/reduced eligibility from district administration.

Rounding used in calculations.

Food and labor costs are the major portion of a food service expense budget. Based on the team's experience, a prudent goal for these expenses is 40%-45% each as a percentage of revenue. Because Sodexo is responsible for food purchases, the actual food costs are unknown. According to Sodexo's 2016-17 budget projections, estimated food costs are 31% of revenue but this could not be verified because the food cost information is proprietary. This percentage is extremely low.

Based on the district's financial reports, labor costs are higher than desirable. In 2012-13, labor was within standards at 45%. Since that time it has ranged from 51%-57%, and current year projections indicate that labor costs are 55% of revenue. It is not unreasonable for labor to be higher than ideal if meals are being prepared from scratch and food costs are indeed as low as Sodexo's projections. However, based on FCMAT's observations and the information provided, it does not appear that many of the meals served are scratch cooked.

High labor costs can be an indicator of excess staffing. This will be further analyzed in the staffing section of this report. The department's total salaries and benefits have risen each year but are projected to be \$78,720 lower this year than in 2015-16. Food service management staff have identified some unfilled positions, totaling approximately 22 hours, that they do not believe have been removed from position control but that will continue to remain unfilled. In addition, food service management staff indicated that recommendations have been made to reduce overtime and extra time costs. These plans may be the reason for the reduced amount of labor in the 2016-17 budget projections; however, the study team had a great deal of difficulty obtaining accurate Food Service Department staffing information, so it is unclear as to the exact reasons for the projected decrease in salaries.

Revenue in the program comes from meal reimbursements and a la carte sales and is directly affected by participation in the food service programs. Revenues have not been consistent over the reviewed time span. In 2013-14 and 2014-15 revenues decreased 5% a year, and in 2015-16 they increased 5%. Current projections are for a 2% decrease in revenue.

In previous years the district provided meals, including breakfasts, lunches and suppers, for some Napa County Office of Education programs at various sites. These were vended meals rather than reimbursable meals and were prepared in the Ridgeview Central Kitchen. Staff indicated that the county office required the district to submit a bid to provide these meals in 2016-17, including meals for some additional school sites in Santa Rosa. Because staff felt they would not be able to service schools in Santa Rosa, a bid was not submitted. A district spreadsheet shows a loss of

147,566 meals and a \$115,397 loss in net revenue, and food service management staff indicated that no labor hours were cut based on this loss.

Enrollment and free and reduced-price meal eligibility are factors in student participation and thus revenue. Enrollment had steadily increased in the district for years, with a high of 18,610 in 2014-15. Since then enrollment has slightly declined, and the district estimated 2016-17 enrollment at 17,951, a decrease of 659 students from 2014-15. Free and reduced-price meal eligibility increased from 43.8% in 2012-13 to 48.4% in 2015-16, with a decrease to 47.3% in October 2016. It does not appear that either changes in enrollment or free and reduced-price meal eligibility are significantly responsible for the declining revenue.

Interviews indicated that student participation has dropped and comparisons of meal reimbursement claims, as shown in the following table, substantiate that information. October 2015 showed a substantial decrease from October 2014 in breakfasts (7%) and lunches (12%) served. September 2016 meal counts for breakfast and lunch were each 5% lower than October 2014.

Daily Meal Count Comparisons

	October 2014	October 2015	September 2016
Total Breakfasts Per Day	2,799	2,613	2,659
Changes from October 2014		-7%	-5%
Total Lunches Per Day	5,942	5,227	5,660
Changes from October 2014		-12%	-5%

During the budget years reviewed, expenses were not adjusted in accordance with reduced revenues and deficit spending has continued. To reverse the current budget trends of deficit spending and unrestricted general fund contribution, the district must seek ways to reduce expenses and/or increase revenue. It is vital that the district closely study its student participation, menus and staffing patterns to strike a balance that can increase meal counts and maximize staff productivity.

There has been some discussion in the district about switching from Sodexo to an independent, district-run food service department for various reasons including cost savings and local control. The Sodexo fees are the majority of the services and other operating expenses (major object code 5000) in the district's cafeteria fund budget. Sodexo's budget spreadsheet shows a 2016-17 projected contract cost of \$2,023,000. These fees include food, manager's salary and other support services such as menu preparation, nutritional analysis, recipes, meals per labor hour (MPLH) analysis, and training materials. If the district were to operate an independent program, many of the costs incurred from the management company would be transferred to district food and labor expenses. Food costs may be higher and extra positions will be needed to perform management and nutritional aspects of the program. There would also be some additional equipment expenses because Sodexo purchased the nutritional analysis and point of sale (POS) software programs and computers for all sites. Total costs may or may not decrease depending on the district's specific circumstances. Absorbing these responsibilities and costs may be attainable and is done by many districts that operate independent programs but would take considerable effort and forethought to achieve successfully.

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. Charge the full allowable indirect cost rate to the cafeteria fund.
3. Ensure that the cafeteria fund budget includes realistic revenue and expenditure projections.
4. Monitor student participation and MPLH and find ways to increase participation and enhance staff productivity.
5. Reduce labor hours accordingly when meal counts and revenues decrease.
6. Investigate the causes for the fluctuations in annual cafeteria fund revenue.
7. Carefully analyze the costs and responsibilities of an independent, district-run food service department versus a management company before making a change.
8. Ensure that up-to-date Food Service Department staffing information is maintained and that it matches position control records and the budget.

Staffing and Meals per Labor Hour

Because labor costs are generally a large percentage of the food service budget, it is important for the department to operate efficiently. Staffing ratios should be adequate to meet the needs of the program without being excessive.

The Ridgeview Central Kitchen prepares and delivers meals to 16 of the district's 19 elementary schools. American Canyon High School prepares and delivers food to the other three elementary schools. The middle schools and comprehensive high schools have cooking kitchens and prepare food for their own students and for the continuation and alternative schools.

Meals per labor hour (MPLH) is an industry standard formula used to measure staff efficiency and help determine the appropriate staffing levels in a food service operation. Labor hours used for this analysis include staff hours at sites and a percentage of central kitchen staff hours and transport hours for satellite sites served by the central kitchen. Labor hours for management or clerical staff are not included because MPLH is a measure of the labor it takes to prepare and serve the meals at sites. In school food service, best practice standards are 30 MPLH but with the labor efficacy of a central kitchen it can be higher.

There are several ways to calculate MPLH, and breakfasts, lunches and a la carte sales must be included in the analysis. Breakfasts are sometimes counted as a fraction of a meal equivalent because they are simpler to prepare or include ready-to-serve items; they are counted as full meal equivalents if site prepared menu items are served. In FCMAT's analysis full meal equivalents were used for breakfasts at the high schools and middle schools and half meal equivalents were used at elementary schools because of the types of menu items served. A la carte food sales are converted to a meal equivalent based on revenue earned. In this analysis a la carte sales were only counted at the middle and high schools because the elementary schools sell very few of these items. The meal equivalent was derived by dividing the total dollar amount of the sales by the average of breakfast and lunch prices. For the district's secondary schools this average is \$2.40. After school snacks are also served at many of the elementary schools. These are simple prepackaged items so they are counted in the MPLH as .33 of a meal equivalent.

The study team completed a detailed site level MPLH analysis for September 2016. Normally October is a good month for analysis because October 1 is the cut-off date for processing free and reduced-price meal applications for the new school year and usually gives a fairly accurate status of eligibility. However, October 2016 meal counts were not yet available at the time of FCMAT's fieldwork.

The analysis shows that the overall district average was 16 MPLH. The average for high schools was 12, middle schools 17, and elementary schools 19. These MPLH averages are extremely low, and the factors affecting them need to be reviewed carefully. Sites with the highest MPLH (high twenties and above) should be studied and used as models for less productive schools. Sites with the highest MPLH in this analysis include Canyon Oaks and Napa Junction. The district should also analyze why MPLH for the elementary schools serviced by American Canyon High School (30 MPLH) are significantly higher than those serviced by the Ridgeview Central Kitchen (17 MPLH). The detailed MPLH analysis is provided in the appendix of this report.

Sodexo also tracks MPLH data for the district using similar methods. Interviews with Sodexo staff indicated a goal of 20 MPLH, and the Sodexo program recommendation report shows the goal is 15 MPLH. In the study team's experience, both of these are low productivity goals. Sodexo's MPLH analysis shows the district average is 17 MPLH with many individual sites much lower than that. This indicates overstaffing and low productivity.

At the time of FCMAT's fieldwork, the district was planning to move some of the central kitchen responsibilities from Ridgeview to middle school and high school sites. Before this is done, further analysis should be completed to determine if it will make the sites more or less productive. This is discussed further in the facilities and equipment section of this report.

MPLH ratios can be improved in two basic ways: increase student 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 later in this report.

Menus and serving line practices need to be simplified so preparation, delivery and meal service can be streamlined and require fewer staff hours. For example, serving three hot entrées at the elementary schools is likely too many considering the amount of time required to prepare and serve them. It would be more efficient to have one hot entrée a day with one or two simple cold items such as sandwiches or yogurt. If personal identification number (PIN) pads were used at elementary schools for student identification instead of the card system, and the organization of lines rearranged, a great deal of time could be saved and some of the smaller schools would likely be able to have just one food service worker at lunch. These items are discussed in further detail later in this report. It may also benefit the district to have a lunch menu that includes fewer entrées or sack lunches for simplified service at sites with low daily lunch counts, such as Mt. George and Yountville.

The district uses plastic trays at the elementary schools, which require additional labor to wash. In the study team's experience it is often less costly to use disposable trays because fewer labor hours are required. However, the cost of disposable trays needs to be considered prior to making a decision to switch.

The department has low a la carte sales. A la carte sales can be a revenue generator especially in schools with very low free and reduced-price meal eligibility. Middle schools and high schools generally are the best sites for these sales. Stricter nutritional regulations have narrowed the choices in a la carte offerings, but there are still some popular foods that can be sold, including some a la carte entrées. Some individuals may have philosophical objections to a la carte sales, mainly due to the desire for students to have full meals. However, many students are choosing not to purchase meals and without adequate a la carte alternatives, they don't participate at all.

As discussed in the budget section of this report, the cafeteria fund has been deficit spending and has required a contribution from the unrestricted general fund for the last several years. In addition, the MPLH analysis indicates that the Food Service Department is overstaffed. The least disruptive method of dealing with a staffing reduction is often through attrition.

Recommendations

The district should:

1. Carefully study the productivity at all sites and the central kitchen to determine ways to make the meal production and service practices more efficient.
2. Change MPLH goals to higher levels and get all staff members involved in improving efficiencies.
3. Consider menu simplification at sites with low daily lunch counts.

4. Perform a cost analysis of the labor required to wash plastic serving trays and the cost of disposables, and consider switching to disposable trays at the elementary schools.
5. Consider expanding a la carte sales, including entrées, at secondary schools.
6. Analyze staffing at all sites and reduce labor hours if student participation is not significantly increased. Review all vacancies as they occur to determine if they can be eliminated or reduced in hours.

Meal Program, Menus, Preparation and Service

Nutritional Requirements

The district participates in the National School Lunch and Breakfast programs, which are regulated by the United States Department of Agriculture (USDA) and the CDE. Regulations were updated in 2010 during the federal reauthorization of the program, 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 new regulations seek to increase the availability of fruits, vegetables, whole grains, and fat-free and low-fat fluid milk on school menus; reduce the levels of sodium, saturated fat and trans fat 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.

Districts must also offer a wider variety of vegetables, including specified weekly amounts of vegetable subgroups. These subgroups include dark green, red/orange, starchy, and legumes. While this is nutritionally sound, it has complicated menu planning and to some extent, decreased student acceptance. A full cup of fruit must be offered at breakfast for all grade levels. Half a cup of fruit and three-fourths cup of vegetables must be offered to K-8 students at lunch, and one cup of both fruit and vegetables must be offered to high school students at lunch. 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. Regulations include the type of milk (fat free and low fat) that must be offered. Regulations also stipulate that hidden fruits or vegetables, such as those baked into other items, cannot count toward the fruit and vegetable requirement. Fruits pureed into smoothies are exempt from this restriction.

Offer versus serve is a meal planning option that allows students to decline some of the food offered in a reimbursable meal. The goal is to reduce food waste and extra expense and permit students to choose foods. At least five items must be offered at lunch and four at breakfast, but students are required to take only three items at each meal. One of the items selected must be a fruit or vegetable, but aside from that, students may choose whatever they want. Offer versus serve is required by regulations at the high school level and highly encouraged at other grade levels. Napa Valley Unified has implemented the offer versus serve option at all grade levels.

Menus

The district's menus are nutritionally adequate and acceptable under the new regulations. Sodexo staff indicated that eight different menus are written to adjust for the requests of different schools, and Sodexo has been very flexible about adding new menu items. For example, the garden bars at each site are beautifully presented and contain a variety of items including lentils,

quinoa salad, and a Mexican coleslaw. However, these are not typically the most popular items for students. Somewhat expensive items, such as jicama sticks, are also offered.

School districts throughout the state and nation are struggling with balancing the requirements of the federal regulations and parent requests with the revenue provided by federal and state meal reimbursements. In addition, to encourage and maintain student participation all menus must be written foremost with student acceptance in mind. A student, no matter how needy, oftentimes will not consume foods they do not like and with which they are not familiar. Consideration must also be given to what is acceptable among different age groups. For example, foods may be difficult to eat for children with missing teeth or with braces, and most students prefer foods that are provided in a quick-to-eat form because they wish to use mealtime as their social time and want to quickly get out to the playground. In the team's experience, even when recess is scheduled before lunch, many students would rather use mealtime to talk than to eat.

The district's elementary schools have a one-week menu cycle with a vegetarian option offered daily. Elementary school menus for August and September 2016 show that the cycle included:

- Two days with three hot items
- One day with two hot items and one cold item
- One day with two hot items
- One day with one hot item and two cold items

The district is trying to offer a good variety of foods for students but may be offering too many entrée choices, especially at the elementary schools.

The elementary staff reportedly prefers a one-week menu cycle because they believe that students can then remember which days they like to eat in the cafeteria. However, if the menu was expanded to a two-week cycle, the top ten favorite items could be offered, as well as some scratch items that may not be popular enough to offer every week. As long as the menu cycle remains consistent, the students will still be familiar with the days they like best. Student favorites, such as pepperoni pizza and whole muscle chicken nuggets, could be served one day each week. A cold option that was consistent every day would ensure that students always know that there is something they like without referring to the menu. Cold item options also cut down on waste.

The district has some unique challenges because of the central kitchen's small size and limited equipment. Foods are prepared early in the morning so they can be delivered to elementary school sites timely. This practice has led to a decreased quality in some foods, such as pizza, because it is held at serving temperature for longer than is ideal. The Food Service Department has taken steps to change the timing of when foods are prepared, with hot foods cooked as late as possible.

Plans for more hub kitchens, school sites that have full kitchens that can prepare food for other nearby sites without kitchens, were being evaluated by the Food Service Department for feasibility at the time of FCMAT's fieldwork. These plans would involve changes in equipment, transport trucks and staffing, and should be thoroughly analyzed and evaluated prior to implementation. It may be more beneficial for the district to change its menus to provide for increased food quality with fewer options. For example, providing three entrée choices that vary daily can lead to excess waste and longer serving lines while students decide what to choose. These concerns were also expressed by food service staff. A better plan may be to offer one hot item, one sandwich and one cold option, such as protein pack that consists of sunflower seeds, cheese, pretzels, grahams and dried cranberries each day or a yogurt, string cheese and cracker option.

One of these choices can still be vegetarian, which is in high demand by many district students. The daily consistency would also promote participation. Young children are particularly reticent to try anything unknown, so these cold options can quickly become their option of choice. It would also be more time-effective for staff at sites with no kitchen equipment to serve only one hot item per day.

The district's middle schools and high schools have essentially a one-day menu cycle with standard items and a daily special that repeats weekly. The sites offer a good variety of menu options; however, the addition of more a la carte sales, especially entrées, and an increase in serving locations per site could increase participation and revenue. The participation section of this report includes additional information regarding a la carte sales.

Scratch cooking has been requested by the Wellness Committee and is a goal of Sodexo's "Think [CA]" school lunch project (<http://www.sodexousa.com/sites/sdxcom-us/home/media/news-releases/newsListArea/news-releases/back-to-school-back-to-the-.html>). It is typically the ideal for quality improvement and use of ingredients with the fewest additives. However, due to the high cost of labor, true scratch cooking must be closely evaluated because there is additional labor involved in the actual food preparation, planning of meals, ordering food items, and cleanup at each kitchen.

Scratch cooking for the elementary schools serviced by Ridgeview is difficult due to the lack of equipment. Recipes would have to be prepared in stages and kept refrigerated until final assembly, then reheated and delivered in bulk. For example, sauce could be made one day, meat cooked the following day, and pasta cooked the next day. Currently most of the Ridgeview staff disperse to other sites prior to the lunch period to help with meal service. This leaves minimal staff and equipment to prepare for future meals. Consideration could be given to reorganizing staff duties in the afternoon to allow them to prepare food for the next day and wash dishes. Menu items would have to be chosen carefully to determine if this method would improve quality and be acceptable for budget purposes.

It may be more prudent to pilot scratch cooking at one or two elementary schools, rather than trying to change the menu for all of the elementary schools at once. The menu could be written with simple scratch cooked items, such as cheddar cheese quesadillas, turkey chili, beef nachos with homemade cheese sauce, and chicken on the bone. If no additional labor is needed, the main ingredients for these items could be prepared at a cooking kitchen, then assembled and served at a school with no cooking facilities. If the pilot program is successful and increased student participation justifies the cost, necessary equipment and staff could be increased at the central kitchen to accommodate all 16 of the elementary schools it serves.

Because of the difficulty in making any menu compliant with the new regulations, more consensus among the district's secondary schools for menu items would assist with food costs, nutritional analysis and administrative work. Site cafeteria managers try to choose items that will increase participation at their particular school, but should also work closely with the other site cafeteria managers to agree on one menu. A menu can be written that incorporates all reasonable choices. As long as all items are offered at least once during the week, the site cafeteria manager would have the flexibility to offer the other items as often as desired. The item usage would simply be noted on the production sheet. In this way, a site cafeteria manager could tailor the menu to the needs of the student population. As required by the USDA, a weighted average calculation would still need to be done periodically. A weighted average is a calculation whereby the number of portions of all items offered during the week are tallied and then divided by the actual number of students served to get a more representative nutrient analysis.

To further improve menu options, the Food Service Department should consider not offering juice every day at lunch for the elementary schools. Many students will not take another fruit or vegetable if juice is offered. Students may also be more likely to take a whole fruit containing fiber and/or drink a milk of any variety if juice is not offered.

The pizza served at the elementary schools could be upgraded to a better quality, such as that served at the middle schools and high schools. Pepperoni pizza, rather than or in addition to cheese pizza, should be offered. The products available to school food service programs now include a lean pepperoni that is lower in fat than any retail variety. The difference in saturated fat between a cheese pizza and a pepperoni pizza is usually only one gram or less, and the difference in overall fat content is only three grams.

The USDA requires a certain mix of vegetables each week, including legumes, dark green, and red/orange vegetables. The Food Service Department has done a nice job of offering a wide selection. However, the reality is that some of these items are not popular with students and may go to waste. These required vegetables should be offered in only the amounts that historically have been taken by students, and common student favorites such as carrots and cucumbers should be added daily to the garden bar to attract more students.

The food service menu could be designed and published in such a way to better highlight the nutritious products that are already offered. For many parents and students, the menu is their only source of information about the food service program. Many parents are often not aware of the variety of fruits and vegetables that are offered daily or the USDA's requirements for: whole grain products, including breads, pasta, pizza, and brown rice; greens that include romaine and spinach; whole muscle chicken; products that are low in fat, not fried, have no trans fat, and lower sodium; and prescribed calories per portion size.

Although the district's menu has nutritional promotion, such as harvest of the month and recipes, the department should use that space to advertise its own successes in a better way. This may be as simple as using more descriptive listings such as "All Beef Hamburger on Whole Wheat Bun," "Whole Grain Cheese Pizza," "Whole Grain Bagel," and "Whole Grain Muffin," as well as terms such as "Oven Baked" for typically fried items and "Extra Lean." These terms will let parents know that the food offered at school is not usually the same food that is available in retail stores and that some of the district's wellness goals are being reached. Even though products are commercially processed, the federal requirements have forced manufacturers to make compliant products especially for schools.

The use of icons on the district's menus, such as "V" currently used for vegetarian options, can also be expanded. Some examples include "WG" (whole grain), "LF" (low fat), and "LS" (low sodium). The district's menus also have icons for local, clean, and fresh, but those were not used on the menus reviewed by the study team.

The menu should highlight the garden bar in a bold way rather than advertising it in a small paragraph. Given the space that is available on the menu, it could be added in the daily box or placed boldly in the middle of the page stating for example, "Garden Bar Offered Daily."

It may be beneficial to the district to encourage parents to start a foundation for the food service program. Big changes that involve items such as new equipment can be costly, and cafeteria funds are limited. The cafeteria fund is also not allowed to pay for building or making changes to facilities. Some districts that have been able to achieve these types of changes have done so through a foundation that elicits donations from individuals and businesses. Some foundations simply sponsor events to increase nutritional awareness and education, while others buy equip-

ment or provide ongoing support so that more natural and/or more expensive food items may be purchased, or so that meal prices are not increased. Some foundations have sponsored assessment teams to help the district prepare for and implement large projects. Depending on the project, these teams might include kitchen architects, public health coordinators, grant writers, dietitians, and/or staff members. The time limitations for a food service director often prohibit them from starting such projects.

Recommendations

The district should:

1. Write menus that are mindful of items acceptable to students.
2. Expand to at least a two-week menu cycle at the elementary schools with fewer entrée options, and offer a consistent daily cold choice as indicated above.
3. Consider changing its menus to provide for increased food quality before deciding whether to make more hub kitchens.
4. Consider piloting scratch cooking at one or two elementary schools rather than trying to change the menu for all of the elementary schools at once. If the pilot program is successful, consider reorganizing staff duties in the afternoon to allow them to prepare food for the next day and wash dishes.
5. Work with the middle school and high school site cafeteria managers to develop a common menu as described above.
6. Consider not offering juice every day at lunch for the elementary schools.
7. Upgrade the quality of pizza dough purchased for the elementary schools and offer pepperoni pizza.
8. Add student favorites such as carrots and cucumbers to the garden bar daily.
9. Ensure that the menus promote the nutritious products that food service uses.
10. Explore the possibility of encouraging parents to start a foundation to support the food service program.

Participation

The Food Service Department recognizes the need to increase participation in the food service program, and the Sodexo general manager has done extensive work to identify target areas to achieve this goal. Most of the department's revenue comes from federal and state meal reimbursements, so student participation in the meal program is vital, especially from the students that are eligible for free and reduced-price meals. The district's overall percentage of free and reduced eligibility increased from 44.9% in 2014-15 to 48.4% in 2015-16. Based on the 2016-17 opportunity assessment document dated September 30, 2016, the participation for students eligible for free and reduced-priced meals, those who should be taking advantage of the program, is low averaging only 47%. Many school districts average a 60%-80% participation rate for students that are eligible for free and reduced-price meals, particularly in elementary and middle schools. High schools often have a low percentage of participation because of open campus options and because of the perceived stigma of being eligible for free and reduced-price meals.

The use of outdoor carts at middle schools and high schools may eliminate the stigma of having to go into the cafeteria and may also make meal purchases more convenient for students. A grab and go meal option may also be convenient for those students who are involved in clubs or sports during lunch. Grab and go meals are prepackaged reimbursable meals that do not require students to have to wait to be served individual items. The study team's observations during site visits indicated that the Silverado Middle School may particularly benefit from these types of options because the campus is situated on two levels, with the cafeteria located at the bottom of a hill.

Promoting the advantages of school food, such as fresh salad bars, convenience and affordability, would encourage more paid students to participate and would further reduce the perceived stigma for free and reduced students. It would also benefit the district to work with a local reporter, and/or use social media platforms such as Twitter, to publish articles about the positive aspects of the food service program and the good foods offered to students.

A survey should be developed for students that asks them the specific reasons why they do not frequent food service. The survey should include choices such as: "no time to eat," "I can't sit with my friends," "the line is too long," "too far from my next class," and "my group doesn't go to the cafeteria" rather than only questions about menu choices. The survey should be tailored to the age level and school site, and working with associated student body (ASB) groups for input and to disseminate information can be helpful.

At the middle schools and high schools, many districts have had success offering food bars such as an Italian pasta bar, a Mexican bar, an Asian bar or a potato bar. These food bars can be a little more time consuming for food service staff and more challenging to fit within regulations, but they are often student favorites and provide them with more flexibility to mix and match food components that suit their preferences. These types of food bars can be offered as the daily special or even more frequently. The same foods are used for other menu items, so inventory isn't increased, but ingredients can be mixed and matched to tailor to student preferences and promote more student participation.

Consideration should also be given to offering a la carte entrées both in the main serving line and on serving carts at the middle schools and high schools. This would provide more choices for students, particularly for paid students who do not want a whole meal and thus are not participating in the food service program. Providing entrée sales and full meals in the same lines also

reduces the overt identification of free and reduced students. A la carte items should be priced high enough so that a full meal is still a better deal.

A key to making sure students return to the cafeteria is to ensure that enough food is available. As with any restaurant, it is a challenge to have enough product on hand and waste as little as possible. During the study team's site visits, one school ran out of all the entrées and did not have a quick backup option planned. In addition, the parfaits that were popular with students were quickly taken and other students were disappointed that none were left. It would benefit the district to review its menu item histories at each site to better predict usage and ensure that the correct number of items is prepared.

The district's "Early Out Wednesdays" have a significant negative impact on participation for numerous elementary schools, all of the middle schools, and two high schools. Students may be more likely to eat at home or elsewhere when they are allowed to go home close to the time lunch is served. Menus for these days are written with fewer choices at some sites so staff does not waste time in preparation. Grab and go bagged meals served closer to the buses may help increase participation on these days, and at the secondary schools, an outdoor cart with online access could facilitate this. The carts could be pulled to suitable locations with a golf cart if necessary. Staff interviews indicated there has been some concern about the possible lack of account privacy if wireless technology is used; however, to the study team's knowledge this has not been an issue for food service departments in other districts.

Offering theme days and giveaways can also promote student participation. Elementary students get excited about a monthly door prize day and a small collectibles or bookmark giveaway that includes popular cartoon characters. These types of promotions have a small initial cost but usually pay for themselves with increased participation on that day, and more importantly, in continued increased participation because students who do not routinely come to the cafeteria are exposed to all that it has to offer. The giveaway should be something that children get excited and talk about rather than simply a holiday cookie that is added to the menu.

Oftentimes it is desirable to have students taste test new items or recipes and rate them prior to placing them on the menu; however, taste testing new menu items while students are in the serving line can also be a quick way to promote them. When a new item is placed on the menu, a noon duty supervisor or an older child can offer small tastings while students are still in line to help increase acceptance of that item. A young student may not risk trying an entire lunch portion for fear they won't like it, but may try a small amount while waiting in line. Often other students convince them to try it, they find that they like it and take the larger portion.

Offering chocolate milk may also provide an incentive for students to participate. Once in the lunch line, they are exposed to salad bars, fruit, and other foods that may not be offered in their homes. Chocolate milk is a student favorite but was taken off the menu because it was a concern for a group of district parents due to the added sugar. A survey of parents done at six district schools in March 2014 showed that most of the parents who responded, 61%-83%, were favorable to giving students the option of chocolate or white milk. The study team did not find that desserts or other items with added sugar are routinely placed on the menu, so the amount of sugar in chocolate milk would not be excessive.

The interview with Connie Weaver, Ph.D., Director, National Institutes of Health Botanical Center for Age-Related Diseases, Purdue University, available at http://www.eatingwell.com/nutrition_health/nutrition_news_information/calcium_conundrum provides an excellent discussion and information about the value of milk in a child's diet.

Fat free chocolate milk is allowable in the federal regulations and is nutritionally equivalent to white milk. Chocolate milk is also a good source of iron, which is not the case with white milk. The district uses Clover brand milk, which has only seven grams more added sugar than 1% white milk. The milk includes evaporated cane sugar and has no high fructose corn syrup. There are equal amounts of calories in chocolate milk and fat free white milk. As a comparison, eight ounces of juice contain 21 grams of sugar as fructose and six ounces of flavored yogurt has 13 grams of cane sugar added and no Vitamin D. Consideration should be given to adding chocolate milk back to the lunch menu because it is a student favorite and some students will choose to skip milk altogether if chocolate is not available. If the POS system was programmed to provide an alert to the cashier similar to the way allergy alerts are shown, parents could specify that they do not want their student to have chocolate milk.

Information provided to FCMAT indicated that there was some discussion by the Wellness Food Subcommittee about offering 2% and whole milk. However, this is not currently allowed by USDA regulations and until further scientific research is done and changes based on this research are incorporated in the regulations, the district does not have the discretion to offer these items.

The published menu can be used as a source of promotion. Although the district prints its menus in black and white rather than in color, as was done in the past, the content can be used to better describe each menu item. More information regarding published menu content is discussed in the meal program section of this report. The district prints its food service menus in advance for three months. This practice does not connote freshness or flexibility. While some money is saved in printing costs for a three-month menu, printing and publishing a monthly menu may increase participation and offset those costs. Even if a substantial number of menu items do not change from month to month, printing menus for a shorter time period indicates that the district is open to new menu ideas and different menu items can be highlighted. The menu is available online with a few printed copies available at each school office or cafeteria, so it would not be difficult to change the look of it monthly, even if most of the items stay the same.

Another way to increase participation is to have a contest, such as a 10% challenge, for site food service staff to incentivize them to be creative in attracting students to the program. For example, after three months, or some other chosen time period, staff at sites that have increased participation by 10% or more could be given a small prize and the winners' names could be published. Site food service staff could also be provided a small budget with which to be creative in attracting more students to the program. For example, students could write their favorite foods on Post-its and put them on a cafeteria wall. This lets students know that their input is valued.

Breakfast Participation

Offering breakfast is not a requirement and is usually offered at a district based on free and reduced-price meal eligibility and the expectation of adequate participation. The district must cover any additional costs for reduced-price and paid meals; thus this program is typically only feasible at schools with a high percentage of free students or those that can produce 30-40 meals per labor hour with a minimum of 60 meals to cover costs. A meal of cold or gently warmed items can be prepared and served by one staff member.

Twenty of the district's schools offer breakfast, and based on the 2016-17 opportunity assessment document dated September 30, 2016, the districtwide average for breakfast participation is 18%. The elementary schools average 25%, middle schools 20% and high schools 10%. In most school districts there are many factors that affect participation, such as bus arrival times and parent drop off schedules. School districts that offer second chance breakfasts at midmorning or breakfast in the

classroom typically have higher participation rates than those that do not offer these options. It may benefit the district to conduct pilot programs on midmorning breakfasts, either at break or recess, at elementary schools with a large percentage of students who are eligible for free and reduced-price meals. Midmorning breakfast could be offered as the only breakfast or as a second chance breakfast. Labor costs must also be considered when choosing schools for a pilot program. Because many of the district's elementary sites do not have cooking kitchens, staffing may not be available midmorning. However, if staff is already coming in for lunch at that time, it could maximize labor.

American Canyon High School only offers breakfast before school. High school students rarely participate in breakfast before school, and consideration should be given to offering a second chance breakfast at the morning break to serve more students in need. The school schedule may have to be adjusted by a few minutes, but a second chance breakfast can be served to a large number of students in a short amount of time. Based on the study team's experience, many students do not eat breakfast at home or may just have a sweet bread and a caffeine drink, and by 9:00 or 9:30 a.m. the student has expended the simple carbohydrates provided by that meal. Students are able to concentrate better if they are given the opportunity to recharge their bodies with a meal at that time. Other students arrive at school too late to eat breakfast. If properly designed, a grab and go breakfast would allow students to eat it quickly or place it in their backpack to eat later. The meal could be as simple as a granola bar, dried fruit and milk. An excellent resource regarding the benefits of breakfast is available from the USDA at https://www.fns.usda.gov/sites/default/files/toolkit_benefitsflyer.pdf.

Sodexo staff has explored the option of offering universal free breakfast at all of the district's schools. The analysis was completed for the following options: all sites, elementary sites only, hot food only and cold food only. The analysis shows that costs would be prohibitive to offer hot universal breakfast at all sites or at all elementary schools with free and reduced populations above 50%. However, a cold universal breakfast could be considered at the sites with the highest free and reduced populations, such as the four elementary schools with over 80% free and reduced populations.

The best way to increase breakfast participation for schools that offer universal free breakfast is by serving it in the classroom. There are various ways to achieve this, but buy-in from teachers and custodial staff is essential. Another method of providing universal free breakfast is by preparing grab and go bags with cold items that can be picked up before school in the cafeteria. It would benefit the district to complete an analysis of the revenues and costs of offering universal free breakfast for the four schools (McPherson, Philips, Shearer, and Snow) with the largest free and reduced populations. If the analysis is favorable, one of these schools could be chosen for a pilot program to help determine the procedures that work best for the district. Numerous websites provide information on this topic; one example is at <http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/Wisconsin-School-Breakfast-Cost-Benefit-Analysis-Report-20071.pdf>.

The district should also analyze school sites that have high free and reduced populations for the availability of the Provision 2 or Community Eligibility Provision options. These options eliminate the need for applications to be processed and base free and reduced-price meal percentages on a prior year's statistics. More information regarding these options is provided on the following websites:

<http://fyi.uwex.edu/wischoolbreakfast/program-models/universal-free-breakfast/>

<https://www.fns.usda.gov/sites/default/files/Prov2Guidance.pdf>

<https://www.fns.usda.gov/sites/default/files/cn/SP22-2016a.pdf>

Recommendations

The district should:

1. Work with a local reporter, and/or use social media platforms, to publicize all the advantages of school food and promote school food as fun, convenient, and healthy.
2. Work to eliminate the stigma of eating in the cafeteria by appealing to more paid students in ways such as offering food on outdoor serving carts away from the cafeteria and grab and go bags offered outside of and in the food service lines.
3. Conduct surveys that ask students about reasons why they do not participate in the food service program, and tailor the surveys to age levels and school sites.
4. Offer themed food bars, such as Italian, Mexican and Asian, at middle schools and high schools to allow students to mix and match food components.
5. Review menu item histories at each site to ensure enough food is prepared, and ensure that food service staff are aware of the items that can be used for quick backup options.
6. Offer a la carte entrées at middle schools and high schools in the serving line and on serving carts.
7. On early out Wednesdays, ensure that menus are written to include simple items that conserve labor, and consider bringing the food out on a cart that is located closer to the buses.
8. Offer theme days and giveaways at the elementary schools.
9. Offer taste tests in the serving lines to spur interest in new items.
10. Educate the staff and parents about the nutritional facts of chocolate milk, and offer chocolate milk at lunch.
11. Promote the positive and healthy aspects of food service on the published menu and considering printing and publishing menus monthly.
12. Incentivize staff to help increase student participation.
13. Consider eliminating the breakfast program at sites with low participation.
14. Offer breakfast at midmorning break at sites where it is cost effective to do so, and focus on those sites with high free and reduced populations and secondary schools first.
15. Explore universal free breakfast and breakfast in the classroom options at sites with over 80% free and reduced populations.
16. Explore the possibility of implementing Provision 2 or Community Eligibility Provision options at sites with high free and reduced populations.

Meal Count Compliance

Student identification (ID) cards are used at all elementary schools for meal service. During its site visits, the study team observed that the method by which the cards are used differs from school to school. In some schools, the cards were handed out by teachers in the classroom or by the teacher who accompanied students to the cafeteria. Other sites had racks where the cards were stored, and students took their card from the rack. In all cases, cashiering was done at the end of the line, and students had to hold their cards while going through the serving line. Many placed their card in their plastic serving basket prior to the food being served, which is both inconvenient and unsanitary. Missing cards were handled in a variety of ways, but at one site students had to write their names on a clipboard, out of the sightline of food service staff, before being served.

At most sites, the last food service staff member on the serving line was supposed to serve hot food while also observing whether each student placed their card in the cashier box. Many students did not put their card in the box, and no one checked the identity of students to ensure it matched the card. Much of the staff's time prior to and after the meal was devoted to sorting cards, making lists of lost cards, and returning cards to classrooms. At the beginning of each school year staff time is also devoted to organizing and replacing cards.

The use of PIN pads, as used at the district's middle schools and high schools, would speed the meal process and make it less prone to error. Each elementary school food service facility has a computer that could be moved to a location that is accessible to students. A food service staff member could be positioned at the end of the serving line where they could check to ensure that each student has taken a complete meal and serve as the cashier, verifying student identity and warning students if account balances are low.

PIN pads are used successfully at many districts for students as young as transitional kindergarten. Some POS systems allow for the PIN to be the same as that used for the computer lab and/or the library so that students only need to learn and remember one PIN. Some type of card could be used for the youngest children and new students until they master their PIN or the child can just state their name to the cashier, but this is typically a slower option. Interviews with site staff indicated that the use of PIN pads would not be a problem for kindergarten students. The PIN pad equipment is not expensive and some POS systems support the use of non-proprietary equipment.

For meal count compliance, the USDA requires that students verify they are using the correct account or card number by stating their name, unless there is a photo on the POS system or card that the cashier can use to identify the student. During the study team's site visits, the proper method for verifying each student's identity was not used. Some students were given cards by their teachers, but there was no ID check by a cashier who looked at the card and had the student identify themselves by name. PIN pads were used at the middle schools and high schools, but students were not required to state their name to the cashier nor was a photo displayed on the POS system. Typically, the cashier knew the student and let them pass, but this is not correct procedure. If a substitute food service worker or someone unfamiliar with the student worked as the cashier, a student could easily use another student's PIN.

Another option is to upload student photos in the POS system. The food service staff can be trained to do this from the school photographer's CDs each year. Many POS systems just need the CDs to be uploaded, and then the system matches them to student accounts. This service may also be provided by eTriton, the district's POS system vendor.

USDA regulations require that someone be positioned at the end of each serving line to ensure that students take the required food components. At most of the sites visited, the study team observed that no one was at the end of the line to do this, or the individual at the end of the line was not able to do it well because of how they were positioned. This requirement can be accomplished by a cashier, a dedicated checker, or a server if properly positioned. With the use of wireless technology, the POS system can be placed at the end of the serving line for this purpose. If wireless access is not available, electrical cords can be rolled out, covered by rugs for safety, and then rolled back at the end of meal service. It is essential to have someone carefully check that each student takes a complete meal, particularly based on the latest USDA regulations that are very specific regarding fruit or vegetable portions. Although some students do not want to take the required number of items, a complete meal must be on each student's tray when they pass the checker.

At some sites a cashier was stationed at the beginning of the serving line. Staff interviews indicated that placing the cashier there avoids the issue of taking a regular meal away from a student, throwing it away and directing them to get an alternate meal if they have a negative account balance. However, placing the cashier at the beginning of the serving line does not allow them to check for complete meals as required by regulations.

The study team also observed that some sites' serving methods tried to incorporate three food components as one unit to ensure they met the requirements. For example, a pizza slice was served on top of a salad, but this is not a true offer versus serve method.

At Napa High School, student crowd control was nonexistent in the food service line. Students swarmed around the cashier while she tried to manage accounts. Several students entered the serving area without entering their PIN so their meal was not included in the site's meal count as free, reduced-price or paid. Many students also walked out of the serving area without having their meal checked for the required food components. The food service area was beautifully merchandised and had a restaurant quality atmosphere, but there was not enough room for so many students to arrive at the same time. The students should be held back in line until there is sufficient room to enter the serving area in an orderly fashion. The use of stanchions or other crowd control equipment would keep students organized and ensure a more accurate meal count.

Serving lines were also fragmented at some of the elementary schools. Students did not have a clear flow from one area to another. For example, large racks that held student ID cards were off to the side of the cafeteria instead of being near where the serving lines assembled. Some of the milk coolers were set away from the serving line; this may be remedied by placing enough milk for one meal service on a cart if the large milk cooler cannot be moved next to the serving line. The condiments and utensils were also in another area away from the serving line. Ideally, all items served should be in a line, even if on a separate table, so that students can quickly pass through and not miss items. This also allows for meals to be more easily checked to ensure they include the required food components.

Some of the elementary schools had two salad bars set up. However, one would be sufficient based on the number of students served.

A meal counting and collection document is required by the USDA and must describe the procedures and policies in effect for each site. It is to be updated annually. This document can be duplicated for schools that have the same procedures, such as some of the elementary schools. However, the district should have at least three separate documents: one for elementary schools, one for middle schools and one for high schools, because the procedures differ. Additional

documents are required for sites that have different procedures, such as the Napa Valley Language Academy that sends meals to classrooms.

The meal counting and collection document provided to FCMAT does not accurately reflect the practices of the district regarding the observation of trays for compliance, how student ID cards are verified at elementary schools or where the cashier is located at secondary schools.

Observations of the Napa Valley Language Academy indicated that the meal service for breakfast was not compliant with proper meal counting procedures. Designated students from each classroom brought ID cards to the cafeteria at the beginning of the school day for those students who wanted breakfast. The students then boxed the menu items and took them to the classroom to be served later in the day at recess. The classroom teacher did not use a roster to check off the students who received meals. Proper procedures require that an adult check off the student names on a roster at the time the student takes the meal to ensure they are properly identified and are taking the correct components. The roster must then be returned to food service staff who enter the meals in the students' POS system accounts.

The meal counting and claiming document used by the district requires that the manager match the number of entrées served to the computer tally of meals served to double check the total. Since taking an entrée is no longer required by the USDA regulations, this procedure needs to be changed. Some districts count the number of serving baskets or boxes put on the serving line for students to put their meals in, record how many are left at the end of meal service and then match the total number used to the computer tally of meals served.

Recommendations

The district should:

1. Place a cashier at the end of each serving line to check for all required food components, verify student ID, and warn students if account balances are low. Alternatively, place a cashier at the beginning of the line with a dedicated checker at the end.
2. Consider using PIN pads instead of ID cards at elementary schools.
3. Check the ID of each student as required for meal count compliance.
4. Ensure that students hand ID cards to a cashier or checker at the end of the serving line rather than placing them in a box.
5. Ensure that students are trained to verbally identify themselves if using PIN pads or ID cards without photos.
6. Upload student photos in the POS system and/or add photos to ID cards.
7. Ensure that the offer versus serve method is followed at all schools.
8. Use some form of crowd control equipment at Napa High School as students enter and exit the serving area to keep them organized and ensure accurate meal counts.

9. Reorganize some elementary school site cafeterias to speed the flow of students, improve access to all items served, and more easily check for complete meals.
10. Consider using one salad bar at each elementary school.
11. Update the meal counting and claiming documents to match current practices, and complete a separate document for each site that has different methods or procedures.
12. Ensure that the proper meal counting procedures are implemented at the Napa Valley Language Academy.
13. Use a method other than the number of entrées served to double check serving counts.

Paid Student Meal Collection Procedures

Students that do not qualify for free or reduced-price meals must pay for their meals. The USDA states in part the following regarding students who do not bring money to school to pay for meals:

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

FNS considers access to healthy school meals including nutritious foods a critical function of the National School Lunch and School Breakfast Programs. Evidence shows that children who regularly eat healthy school meals perform better in the classroom and are less likely to be overweight. However, FNS also recognizes that allowing children to "charge" school meals can have financial impacts on individual schools and even school districts. This is especially true when meal charges are not subsequently paid, results in large unpaid meal charges and potential financial losses.

<http://www.fns.usda.gov/fr-101614b>

Basically, the USDA has stated it is a district's responsibility to decide if it will allow a student to eat school meals when they do not have money to pay for them. The USDA has also indicated that if a district allows meals to be charged, it is the district's responsibility to cover the bill if the student leaves the district without paying. The cafeteria fund cannot be used to pay for charged meals that are not subsequently repaid. Account balances that are unpaid at the end of the fiscal year are considered bad debt and cannot be absorbed by the federally funded cafeteria program or carried over to the next school year. The charges must be paid from other funds while the district continues to pursue payment from the students. More information regarding this issue is available at <http://www.cde.ca.gov/ls/nu/sn/cafefundfaqgen.asp>.

Districts all over the United States have struggled with the problem of what to do when a student comes to school with no home-packed lunch and does not have money to buy one from the school lunch program. Some districts have allowed students to charge unlimited amounts, and then the district has reimbursed the cafeteria fund thousands of dollars in lost revenue. Other districts have not allowed students to charge any meals, but this has created significant problems with parents.

Unpaid student charges at Napa Valley Unified School District were high at the end of 2015-16 and reportedly had been higher in previous years. At the time of FCMAT's fieldwork, some students had negative balances of \$150 or more. The district has had some success this year in working with parents to reduce large negative balances using the new POS software system and implementing negative balance policies that are posted on the district website and provided to students.

The district's negative balance policies are extremely liberal. A student is allowed to charge four meals and/or \$13 before an alternate meal is given and \$25 before the account is frozen. The policies are not clear regarding whether the student is charged for the alternate meal or what happens after the \$25 limit is reached. A limit of \$25 per child for a family with many children may be an amount that cannot easily be repaid. Some school districts only allow for two meal charges at elementary schools, one or less at middle schools, none at high schools and maintain a \$10 limit for charges.

The district's new POS system, eTriton, allows unpaid charges to be tracked more easily and to provide timelier notifications to students and parents. The system has the ability to make automatic phone calls to parents and make them aware of the balances, and parents can also log into their student's account to see the balance. The POS system allows students to prepay for meals or pay on the day they want to eat. As soon as a student's account balance is negative, a letter is sent home with the student stating they owe money for the meal. The POS system also has the ability to send an email or text to the parent when an established low balance is reached, and this information can be imported from the student information system.

The online payment system that the district uses also allows parents to sign up and be informed via email when their student's balance reaches a warning level that the parent chooses. Staff indicated that when contacted by parents, the district makes every effort to work with them and create a payment plan if necessary.

However, it is sometimes possible that parents do not know that their student's account is out of money. The student may then be instructed to take an alternate meal, which may be embarrassing for them. If the POS system was used to its full potential in the serving line, the cashier would be able to remind the child when their balance was getting low, such as two or three meals before the account is out of funds. The POS system can also be used to borrow from one family member to another if there are siblings in the same school and the balance is higher for another child.

The USDA has also suggested setting up a special account through the parent teacher organization or other community organizations that will cover delinquent charges. This account could be used daily when students forget their money or to help at year end with uncollectible meal charges. Some districts such as the Minneapolis Public Schools have used Facebook or Twitter to elicit private donations to pay for charges (<http://helpmplskids.com/>).

The USDA has published more information on this topic in its memorandum Unpaid Meal Charges: Guidance and Q&A located at <http://www.fns.usda.gov/sites/default/files/cn/SP57-2016os.pdf>.

Recommendations

The district should:

1. Decrease its negative balance policies to allow for two meal charges for elementary students, one for middle school students and none for high school students. Ensure negative balances do not exceed its policies.
2. Use the POS system to its full potential including in the serving line by having cashiers remind students when balances are low and again each day when the balance is negative.

3. Ensure that negative account balance letters remind parents that free and reduced-price meal applications are available all year and that the letters are also provided in Spanish.
4. Consider working with parent and community organizations and private donors to help pay for meal charges.

Direct Certification

Direct certification is the federally mandated process that school nutrition programs must use to certify school-age recipients of CalFresh and CalWORKs benefits as eligible for free school meals without completing an application. The CDE has established a statewide direct certification system that matches data from the student information stored in the California Longitudinal Pupil Achievement Data System (CALPADS) against statewide data. CALPADS provides the direct certification results to all public schools, county offices of education and charter schools through its electronic notification process. More information about this process can be found on CDE's website <http://www.cde.ca.gov/ls/nu/sn/directcert.asp>. Direct certification from respective counties is also available in many parts of the state.

Title 7, Code of Federal Regulations, Section 245.6(b)(3) requires school food authorities to conduct direct certification matching activities at least three times per school year, including but not limited to, the following:

- At or around the beginning of the school year
- Three months after the initial effort
- Six months after the initial effort

Districts with populations that move frequently should also consider completing the process monthly to capture as many free and reduced eligible students as possible. If a student is directly certified as eligible for free meals, the district must send a notification letter to the student's household. More information about these requirements and the CDE's sample notification letter are available at <http://www.cde.ca.gov/ls/nu/sn/mbusdasnp092012.asp> and <http://www.cde.ca.gov/ls/nu/sn/eligmaterials.asp>.

The district's Food Service Department does not complete the direct certification process until well after school starts each year, as it reportedly waits for this information to be provided by the technology department staff in October. However, if the process were completed as early as possible after July 1, the staff time spent on these duties could be reduced by not processing free and reduced-price meal applications for students who are automatically authorized for free meals. The USDA eligibility regulations also state that any child in the household with those who are directly certified can be approved without an application, and this helps to eliminate confusion with kindergarten students and siblings who may not get free meals as they expected.

The district's student information system (Aeries) can also provide reports on foster, homeless and migrant students who can be directly certified. The direct certification data is downloaded from CALPADS into a spreadsheet. It is then manipulated to get specific information that can be uploaded to the food service POS software. This process can be taught to food service staff, such as the secretary II that processes free and reduced-price meal applications.

Recommendations

The district should:

1. Download the state direct certification data, county data and Aeries data at least one month prior to the start of school so that notification letters reach households timely, thus preventing the processing of unnecessary applications for free and reduced-price meals.

2. Determine if the direct certification process is available through Napa County and implement it, if available.
3. Complete the direct certification process at least three times per year as required by federal regulations.
4. Train appropriate food service staff members on the processes necessary to download direct certification information to the POS system.

Wellness Policy

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

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

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

The district's Board Policy 5030, Student Wellness, covers the requirements, including a Wellness Committee and documentation of the implementation, monitoring and reporting aspects in the 2010 federal requirements. The district provided detailed reports of these activities and appears to have a very active Wellness Committee.

The Wellness Committee has subcommittees that concentrate on certain aspects of the wellness policy. The food subcommittee has been active in trying to change the district's food service menu to reflect the subcommittee's preferences, including more local (farm to school) produce, expanding breakfast to all sites, adding a supper program at some sites, changing the number of entrées served and eliminating specific menu items. While it is good to gather input and listen to opinions, the committee and/or subcommittees should not be able to dictate changes that can negatively affect participation, revenue or expenses in the cafeteria program. Examples of these negative effects are the elimination of chocolate milk from menus and not serving pepperoni on pizza. These are student favorites and are allowable within the nutritional guidelines of the program. Interviews indicated that the Food Service Department made these changes under pressure and believes the changes have negatively affected participation. District administration should support the Food Service Department in final decisions about menu offerings and program management based on student preferences, program regulations and fiscal solvency.

More information about the requirements of a district wellness policy are available on the CDE website <http://www.cde.ca.gov/ls/nu/he/wellness.asp>.

Recommendations

The district should:

1. Ensure that all staff and student families are aware of its wellness policy.
2. Ensure that the Food Service Department is empowered to make final decisions about menus and program management.

Competitive Food Sales

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 that are 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, à la carte items sold by the food service department, and items sold at fundraisers. More detailed information can be found in the appendix of this report and at <http://www.cde.ca.gov/ls/nu/he/compfoods.asp>.

The district's Food Service Department sells very few snacks, and based on FCMAT's observations, those that are sold follow nutritional requirements. However, interviews with food service and site staff indicated that schools do not always abide by the regulations for fundraising activities. Additionally, at Silverado Middle School, the student store is run by the parent teacher organization, which is not allowed by the California Code of Regulations, Title 5, Section 15501. Only student groups may sell food during the school day.

Competitive foods and beverages are governed by numerous laws, regulations and policies at the federal, state, and local school district levels. Each school district participating in a federally reimbursable meal program is required to adopt a local school wellness policy, which may further limit the competitive products that can be sold. California has had strict competitive food regulations for many years, and while new federal regulations took effect in July 2014, most of these new regulations were already operative in California. Failure to abide by competitive food sales requirements may result in the state withholding federal and state meal reimbursements, even when violations are caused by school sites and not the food service department. It is vital that the district educates staff, students and parents about these issues and enforces the requirements. It would also benefit the district to assign an employee to approve all competitive food sales at school sites.

Recommendations

The district should:

1. Educate staff, students and parents about current competitive food sales laws, regulations and policies, and ensure that all groups follow them.
2. Close the student stores run by parent teacher organizations or give them to a student group to operate and receive revenues from.
3. Assign a management employee to approve all competitive food sales at school sites.
4. Direct administrators, food service staff and the Wellness Committee to work together to ensure compliance in competitive food sales.

Facilities and Equipment

During its fieldwork, the study team visited several food service facilities and observed the condition and functionality of the kitchens and serving areas. Several of the district's food service facilities are old and need repairs and/or equipment upgrades. The elementary sites are all satellite schools receiving meals from central sources. Of the 19 elementary schools, 16 are served by the Ridgeview Central Kitchen. The remaining three elementary schools are served by American Canyon High School.

The Ridgeview facility is an old warehouse building that is outfitted with kitchen equipment and a large storage area for dry goods as well as frozen and refrigerated foods. The facility has several double stack convection ovens for heating most of the daily entrées. It also has two 30-gallon kettles for preparing batches of food such as spaghetti and chili, but staff indicated that the capacity is inadequate for the number of meals served, so these types of items are not on the menu. Staff expressed the need for an additional kettle as well as one more walk-in refrigerator and freezer because the cold storage capacity is not adequate.

The dry storage area of the warehouse is large but does not have any multilevel racks to stack cases of food. Installing multilevel racks would tremendously increase storage capacity but would require use of a forklift and must be done in compliance with local building codes. Staff indicated that the department's forklift is old and not consistently operational.

Ridgeview has three large transport trucks that take food to the satellite schools. Because of the number of schools served and the amount of food prepared, food preparation happens early in the morning, and the food for lunch must be ready to deliver by 7:00 to 7:30 a.m. This is four to five hours prior to serving times and has become an issue in food quality. The central kitchen staff expressed a need for an additional delivery truck so that another route could be added and delivery time reduced.

Food service management indicated there are plans to solve the transport and quality issues by reallocating the food preparation and delivery duties for some of the schools served by Ridgeview to other middle and high school sites. The plans include making the changes in three stages beginning in fall 2016 and ending in spring 2017. These changes in central kitchen duties will affect staffing, equipment needs and transport issues throughout the district. For example, Ridgeview has more space than any other district food service facility to store and prepare food and will be underutilized if most of the schools are reassigned to other preparation kitchens. In addition, changing to multiple preparation sites may require more delivery trucks and drivers. Therefore, it would benefit the district to further analyze all of these issues prior to implementing such a plan.

Some districts delegate elementary schools to be reheating or partial preparation kitchens to lessen the load on central kitchens. However, the district's elementary school food service facilities are basically receiving kitchens, most without adequate space or equipment to prepare any food on site. Most of the facilities are dated and do not have the required clean-up areas, such as three compartment sinks, and some do not have hot water. A few of the schools could do some reheating of foods if they had the proper equipment, such as retherm ovens and larger cold storage equipment. However, this may require electrical and facility upgrades to make them legitimate food preparation sites.

The high school and middle school kitchens seem to have adequate space and equipment for their current needs but may need upgrades to absorb the preparation of additional elementary meals.

One task that satellite sites have been given may be best done at the central kitchen. Cases of fruit are sent out to sites with the expectation that they will wash the fruit. Many of the sites do not have appropriate sinks for this task nor the staff time. The study team observed one site that served fresh apples directly out of the case that had just been delivered without washing them.

Small-equipment needs should be reviewed throughout the district's food service facilities. Staff members at the Ridgeview facility as well as other sites indicated a shortage of sheet pans and student trays. There are only enough sheet pans and trays for one day's use and these are sent back to the central kitchen daily to be cleaned for the next day's use. Purchasing more of these items may help with staff efficiencies.

During FCMAT's site visits, the main serving implement used on the salad bar at elementary schools was a one-cup capacity spoodle, which is like a measuring cup on a handle and similar to a large soup ladle. It was too large to fit into many of the salad bar containers and was awkward for small children to use. Staff indicated they were told by the state to use them because of the one-cup portion requirement for salad greens. However, the minimum portion requirements on the salad bar is one-half cup total of all fruit and vegetable choices. Students and staff can be taught to identify proper portions, and site observations indicated that students were taking adequate portions. Scoops and tongs are used for this purpose at many districts and are much easier for children to use.

Recommendations

The district should:

1. Further analyze its best options for the central kitchen facility and delivery system to elementary sites before making any changes in the current process. Consider storage capacity, preparation space, equipment, transport and staffing needs.
2. Consider washing fruit at the central kitchens before it is sent to sites.
3. Analyze and discuss with staff the facility and equipment needs at all sites and develop a prioritized master plan for purchasing and/or replacing these items.
4. Identify small-equipment needs throughout the district and purchase these items on a priority basis.
5. Purchase smaller scoops and tongs for salad bars and educate staff and students about portion requirements.

State Administrative Review

Child nutrition programs receive a state administrative review every three years to assess program compliance. The review is comprehensive and includes all aspects of the program such as menu compliance, meal counting and claiming, eligibility determination, food safety, financial compliance, and the wellness policy. The state is required to visit a certain number of sites based on a district's size and to review a percentage of free and reduced-price meal applications based on the number processed.

The district had its administrative review in March 2016 and did well with only minor findings, all of which appear to have been addressed and corrected as required. Examples of the findings include just four errors in application processing out of 590 students reviewed, food safety manuals not located at sites, health department inspection reports not posted at sites, and site monitoring reports not completed at several sites.

The findings above are minor; however, food service management should expand their actions related to the site monitoring reports finding and visit sites regularly to monitor procedures and ensure program compliance, rather than only conducting the required annual site visits.

Ongoing staff training needs to be done to ensure that all site staff understand and follow regulations. During its site visits, the study team observed procedures during meal service that do not meet program regulations. Issues observed included complete meals not being taken by students and the lack of proper student identification at the point of sale. This is discussed in more detail in the meal count compliance section of the report. These types of issues would be discovered by management staff when conducting regular site visits and ensuring that program compliance becomes a habit with staff members so the district is always prepared for state reviews. The monitoring should be comprehensive and not done just to complete the annual site monitoring report.

Recommendation

The district should:

1. Ensure that food service management staff is thoroughly familiar with program regulations and all aspects of the state administrative review process, and that they train staff on these issues and routinely visit sites and monitor the program for compliance.

Staff Training

Food service staff members need to receive regular training to be able to understand and perform their jobs. The responsibilities for staff training in the district need to be reviewed and clarified. Interviews indicated that Sodexo is responsible to provide training materials, but that the district must provide the actual staff training. However, the Sodexo contract states that Sodexo will provide staff training. The Sodexo general manager and the district food and nutrition operations assistant are both new to their positions, having held them for less than one year. It appears that there has been a training gap due either to the lack of clarity of responsibilities or because they are both new to their positions.

During FCMAT site visits, some staff members and students seemed unclear about portion control and what constitutes a complete meal. In many cases students were told to take more food when they already had all necessary components on their trays. There were also frequent incidents in which students left the serving line with too little food on their trays or were missing the required fruit or vegetable item. In some cases this may have been due to staff not understanding program requirements regarding portion control or complete meals, and at some sites it was likely due to line set-ups that positioned the POS system before the end of the line with no staff member designated to observe final trays. Observations also indicated a lack of training or supervision in food safety. For example, staff at one site was observed serving fresh apples directly from the shipping box without washing them.

Training is essential, and the USDA has established minimum education and training requirements for 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 requirements vary with the position. Training needs to be documented and will be evaluated during state administrative reviews. Information about this mandate and training resources can be found in the appendix of this report and at the website <http://professionalstandards.nal.usda.gov/>.

Recommendations

The district should:

1. Review and clarify staff training responsibilities between Sodexo and district management and create a plan for annual training sessions.
2. Routinely review the food service regulations and procedures with staff both in regularly scheduled meetings and spontaneously when problems are observed. Ensure that staff members understand the regulations and procedures and abide by them; include adherence as part of the employee evaluation process.
3. Ensure that Food Service Department management staff visit sites regularly and take action to clarify procedures with staff as needed.
4. Ensure that the USDA's training and education requirements are met and document all trainings as required.

Appendices

Appendix A

Meals per Labor Hour Analysis, September 2016

SCHOOLS	Daily										
	Breakfast	Breakfast Equivalent	Lunch	Snack Equivalent	A la Carte \$	A la Carte Equivalent	Total Meal Equivalents	Site Hours	Ridgeview/ American Canyon Prep Hours	Total Hours	MPLH
Prepped by Ridgeview Central Kitchen											
Alta Heights	35	17.5	126				144	6.50	4.42	10.92	13
Bel Aire Park	110	55	229	4			288	7.75	8.86	16.61	17
Browns Valley	0	0	183	5			188	5.25	5.78	11.03	17
El Centro	0	0	73	4			77	2.75	2.36	5.11	15
McPherson	50	25	271				296	8.50	9.11	17.61	17
Mt. George	0	0	40	8			48	2.00	1.48	3.48	14
Northwood	0	0	112				112	3.25	3.45	6.70	17
Phillips	71	35.5	306				342	8.75	10.51	19.26	18
Pueblo Vista	70	35	170				205	4.25	6.31	10.56	19
Salvador	73	36.5	119				156	5.50	4.79	10.29	15
Shearer	116	58	394				452	8.50	13.92	22.42	20
Snow	199	99.5	283				383	8.00	11.78	19.78	19
Vichy	0	0	74				74	5.00	2.28	7.28	10
West Park	30	15	92				107	2.50	3.29	5.79	18
Yountville	0	0	29				29	2.00	0.89	2.89	10
Napa Valley Language Academy	295	147.5	243				391	8.25	12.02	20.27	19
Total Ridgeview Schools							3289	88.75	101.25	190.00	17
Prepped by American Canyon High											
Canyon Oaks	0	0	287				287	3.25	3.50	6.75	42
Donaldson Way	0	0	198				198	6.00	2.42	8.42	24
Napa Junction	130	65	187				252	6.25	3.08	9.33	27
Total American Canyon Schools							737	15.50	9.00	24.50	30
Average Elementary MPLH							4026			214.50	19
American Canyon High	45	45	396		212	88	529	52.75		52.75	10
Napa High/Valley Oak High	322	322	279		271	113	714	58.00		58.00	12
Vintage High	253	253	305		184	77	635	45.50		45.50	14
Average High School MPLH							1878	156.25		156.25	12
American Canyon Middle	159	159	307		309	129	595	33.00		33.00	18
Harvest Middle/River/New Tech High	258	258	381		280	117	756	45.25		45.25	17
Redwood Middle	225	225	291		260	108	624	39.50		39.50	16
Silverado Middle	249	249	285		242	101	635	35.25		35.25	18
Average Middle School MPLH							2610	153.00		153.00	17
District Average MPLH							8513			523.75	16

Sources: September 2016 SNP claim and district staffing spreadsheets.

Rounding used in calculations.

Appendix B

Competitive Food Sales

QUICK REFERENCE CARDS

NON-CHARTER PUBLIC SCHOOLS

ELEMENTARY SCHOOL – FOOD RESTRICTIONS

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

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

Effective from midnight to one-half hour after school.

Applies to ALL foods sold to students by any entity.

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

Compliant foods:

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

AND

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

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

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

** A whole grain item contains:

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

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

CHECK YOUR DISTRICT’S WELLNESS POLICY FOR STRICTER RULES.

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

ELEMENTARY SCHOOL – BEVERAGE RESTRICTIONS

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

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

Effective from midnight to one-half hour after school.

Applies to ALL beverages sold to students by any entity.

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

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

Compliant beverages:

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

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

ELEMENTARY SCHOOL – STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15500

Effective from midnight to one-half hour after school.

Applies to food and beverage sales by student organizations.

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

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

QUICK REFERENCE CARDS

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

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

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

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

Effective from midnight to one-half hour after school.

Applies to ALL foods sold to students by any entity.

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

Compliant foods:

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

AND must meet one of the following

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

AND

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

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

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

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

AND must meet one of the following

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

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

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

** A whole grain item contains:

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

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

CHECK YOUR DISTRICT’S WELLNESS POLICY FOR STRICTER RULES.

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

MIDDLE/HIGH SCHOOL – BEVERAGE RESTRICTIONS

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

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

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

Effective from midnight to one-half hour after school.

Applies to ALL beverages sold to students by any entity.

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

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

Compliant beverages:

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

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

MIDDLE/HIGH SCHOOLS – STUDENT ORGANIZATIONS

Reference: *California Code of Regulations* Section 15501

Effective from midnight to one-half hour after school.

Applies ONLY to food and beverage sales by student organizations.

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

Appendix C

Professional Standards

School Food Authority Director's Guide to Professional Standards

New professional standards require annual training for all program staff and hiring standards for new directors. Part of the Healthy, Hunger-Free Kids Act of 2010, these Federal standards became effective July 1, 2015. The goal of the standards is to help you and your staff maintain or acquire the knowledge and skills needed to successfully manage and operate school meal programs.

Annual Minimum Required Training Hours for Directors, Managers, and School Staff

The first year (July 1, 2015-June 30, 2016) training requirements are lower:

Director – 8 hours;
Manager – 6 hours;
All staff – 4 hours.

Position	Defined As	Annual Hours*
Director	Responsible for managing school nutrition programs for all schools under an SFA	12
Manager	In charge of the operations of a site (or several sites)	10
Staff	Works 20 or more hours weekly in direct program support	6
Part-time Staff	Works less than 20 hours per week in direct program support	4

*If hired on or after January 1, only half of the required hours for that school year are required.

What Qualifies as Training?

Training should apply to an employee's work duties. In addition to your own training, you should plan to assist your managers and staff with training. Consider these options for job-specific training:

- ▶ Online courses
- ▶ Structured, on-the-job training
- ▶ In-service training
- ▶ Local school nutrition organization educational events
- ▶ State agency-sponsored training
- ▶ Training you conduct for staff
- ▶ Meetings sponsored by foodservice partners (vendors and commodity groups), including exhibits (as allowed by your State agency)
- ▶ College courses with job-specific content

A full 60 minutes of training counts as 1 training hour. You can include shorter time periods. For example, four 15-minute in-service training sessions equal 1 training hour. Not all activities will count toward training – they must be job-specific.

Your State agency (SA) provides guidance on using funds from the non-profit school foodservice account for training. Many costs are allowable expenses.

Training records are now part of the Administrative Review. Be sure to record annual staff training and keep on file for 3 years plus the current school year. Open audits require different record-retention periods. Check with your SA for guidance. USDA offers an optional software tool to track training for you and your staff. Find the tool online at <http://www.fns.usda.gov/school-meals/professional-standards>.

Check with your SA to see if it allows a flexible 2-year period to complete the training hours. If so, be sure you and your staff complete some training each year (July 1-June 30) and meet the total number of hours needed for 2 years.

What Are the Hiring Standards for New Directors?

The standards also include hiring minimums for new directors based on student enrollment levels. If you are a director hired before July 1, 2015, the new hiring standards do not apply. This is still true if you change director jobs but stay in the same or lower student enrollment category. However, if you change director jobs and move to an LEA with a higher enrollment category, the hiring standards will apply.

Where Do I Find More Information?

Looking for free and low-cost training? USDA maintains an online searchable library of trainings at <http://professionalstandards.nal.usda.gov>. Additionally, your SA must offer at least 18 hours of free training each year, so contact your SA and/or check out their Web site for more information on State-sponsored training.

You can read more details, including hiring standards for new directors, in the *Guide to Professional Standards for School Nutrition Programs* http://www.fns.usda.gov/sites/default/files/ps_guide.pdf, the FAQs http://www.fns.usda.gov/sites/default/files/cn/ps_faqs.pdf, and several other helpful resources at <http://www.fns.usda.gov/school-meals/professional-standards>.

Appendix D

Study Agreement



CSIS California School Information Services

**FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM
STUDY AGREEMENT
May 19, 2016**

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

1. BASIS OF AGREEMENT

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

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

2. SCOPE OF THE WORK

A. Scope and Objectives of the Study

The Napa Valley Unified School District is requesting FCMAT to conduct a review of the district's food service department that will consist of the following:

1. Examine the food service department's operational processes and procedures in areas including but not limited to food preparation, meal service, student participation, staffing, federal and state compliance, menu planning, purchasing, warehousing and food storage, inventory, and facilities, and make recommendations for improved efficiency and alternative operational structures, if any.
2. Evaluate the department's work flow and distribution of functions and provide recommendations for improved efficiency, if any.

3. Review training and professional development programs for the department's employees and managers and make recommendations for improvements, if any.

B. Services and Products to be Provided

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

3. PROJECT PERSONNEL

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

- | | |
|----------------------------|-------------------------|
| A. To be determined | FCMAT Staff |
| B. To be determined | FCMAT Consultant |
| C. To be determined | FCMAT Consultant |
| D. To be determined | FCMAT Consultant |

4. PROJECT COSTS

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

- A. \$500 per day for each staff member while on site, conducting fieldwork at other locations, presenting reports and participating in meetings. The cost of independent FCMAT consultants will be billed at their actual daily rate for all work performed.
- 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 \$28,600.

- 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.

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 field work; 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 field work, the district may terminate its request for service and will be responsible for all costs incurred by FCMAT to the date of termination under Section 4 (Project Costs). If the district does not provide written notice of termination prior to completion of fieldwork, the team will complete its work and deliver its report and the district will be responsible for the full costs. The district understands and agrees that FCMAT is a state agency and all FCMAT reports are published on the FCMAT website and made available to interested parties in state government. In the absence of extraordinary circumstances, FCMAT will not withhold preparation, publication and distribution of a report once fieldwork has been completed, and the district shall not request that it do so.

8. INDEPENDENT CONTRACTOR

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

9. INSURANCE


During the term of this agreement, FCMAT shall maintain liability insurance of not less than \$1 million unless otherwise agreed upon in writing by the district, automobile 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 additional insured endorsements, indicating applicable insurance coverages upon request.

10. HOLD HARMLESS


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

11. CONTACT PERSON

Name: J. Wade Roach, Assistant Superintendent, Business Services
Telephone: (707) 253-3533
Fax: (707) 975-6298
E-mail: wroach@nvusd.org



J. Wade Roach
Assistant Superintendent, Business Services
Napa Valley Unified School District
5/19/16
Date



Michael H. Fine,
Chief Administrative Officer
Fiscal Crisis and Management Assistance Team
5/19/16
Date