



CSIS California School Information Services

San Juan Unified School District

Food Services Operational Review

April 25, 2017



Joel D. Montero
Chief Executive Officer





April 25, 2017

Kent Kern, Superintendent
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA

Dear Superintendent Kern:

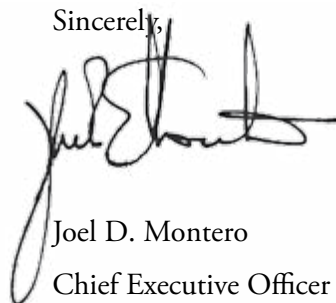
In March 2016, the San Juan Unified School District and the Fiscal Crisis and Management Assistance Team (FCMAT) entered into an agreement to provide a review of the district's food services operations. Specifically, the agreement states that FCMAT will perform the following:

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, if any.
2. Evaluate the department's workflow and distribution of functions and provide recommendations for improved efficiency, if any.
3. Review training and professional development programs for the department's employees and managers and make recommendations for improvements, if any.
4. Review the feasibility of provisional meal alternatives and central kitchen versus decentralized kitchen options.

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

We appreciate the opportunity to serve you and we extend our thanks to all the staff of the San Juan Unified School District for their cooperation and assistance during fieldwork.

Sincerely,



Joel D. Montero
Chief Executive Officer

FCMAT

Joel D. Montero, Chief Executive Officer

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About FCMAT

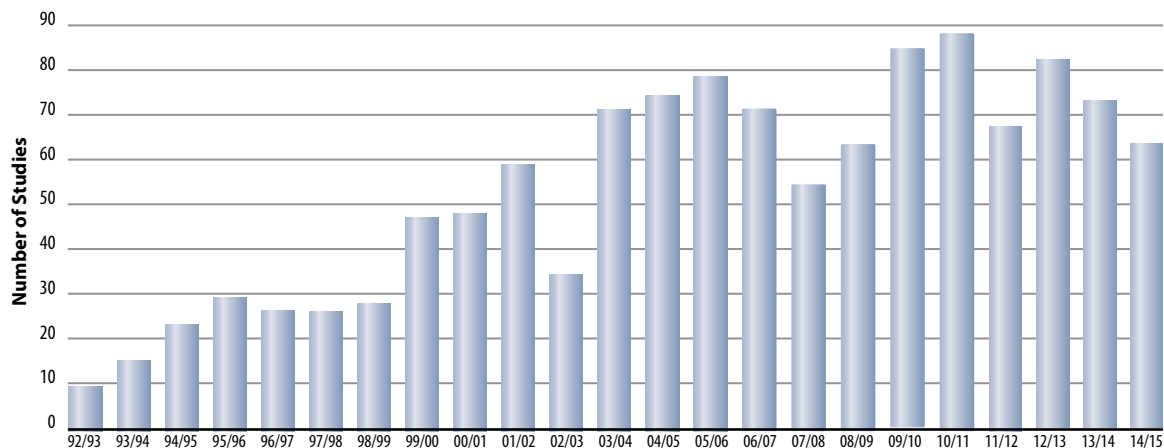
FCMAT's primary mission is to assist California's local K-14 educational agencies to identify, prevent, and resolve financial, human resources and data management challenges. FCMAT provides fiscal and data management assistance, professional development training, product development and other related 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) and also maintains DataGate, the FCMAT/CSIS software LEAs use for CSIS services. 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 statewide data management work. AB 1115 in 1999 codified CSIS' mission.

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

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

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

Introduction

Background

The San Juan Unified School District is located in Sacramento County and serves the communities of Citrus Heights, Carmichael, Orangevale, Fair Oaks, Arden-Arcade and parts of Rancho Cordova and Sacramento. The district has a growing and ethnically diverse student population of close to 40,000 at 68 sites including one alternative school, one continuation school, 41 elementary schools, 11 high schools, eight middle schools and eight special program centers. The district operates a child nutrition program that includes breakfast, snack, and lunch for students in Pre-K through grade 12, vended meals prepared in advance by food services for students in its early childhood education and after-school programs, and a summer food service and supper program, all of which must meet United States Department of Agriculture (USDA) dietary guidelines.

Information from DataQuest (data1.cde.gov/Dataquest) shows that the district's enrollment has increased each year since 2010-11; however, this data includes charter school enrollment. Enrollment, exclusive of charter schools, as certified in the California Longitudinal Pupil Achievement Data System (CALPADS) for the 2015-16 fiscal year was 39,985, and the unduplicated count of students eligible for free and reduced-price meals was 20,081, or 50.22% of enrolled students. For the 2016-17 Fall Certification process the district reported enrollment of 39,730, exclusive of charter schools and Unduplicated Eligible Free and Reduced Meal counts of 20,479 or 51.55%.

The Nutrition Services Department has 247 employees and nearly 70 schools that are spread over about 75 square miles. The size, both in enrollment and geographic demographics, of this district is complex and presents many operational challenges. The regulations for child nutrition programs have also become increasingly stringent over the past several years, requiring careful oversight and effective communication.

The budget and historical financial reports for the cafeteria fund show that the program has been in a structural deficit spending cycle, with deficits projected to continue in the current budget. Revenue has been stable, increasing slightly each year except for a small dip in 2014-15. In 2013-14, the department was required to establish a spending plan to reduce reserve balances exceeding allowable levels. Enactment of the plan achieved the desired results; however, part of that document included ongoing expenditures that were not one-time in nature, and the department is attempting to slow spending.

Study Guidelines

FCMAT visited the district October 17-21, 2016 to conduct interviews, observe nutrition services facilities, meal preparation and serving operations, collect data and review documents. This report is the result of those activities and is divided into the following sections:

- I. Executive Summary
- II. Budget
- III. Workflow, Distribution of Functions and Operational Efficiencies
- IV. Meal Program, Menu Planning and Service
- V. Subsidized Meal Programs
- VI. Other Operational Components
- VII. Facilities
- VIII. Appendices

Study Team

The study team was composed of the following members:

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Executive Summary

The Nutrition Services Department is responsible for an extremely large operation, providing services to nearly 70 school sites and supplemental program locations throughout the district. The district administration indicated the request for FCMATs departmental review was not prompted by any significant concerns; however, the administration acknowledges an ongoing and growing program deficit that must be rectified. The administration also expressed a desire to ensure operations are optimal and identify potential areas for improvement.

The district has some obstacles; some result from its size and geographic layout while others arise from changes in student populations. Similar to many school districts in California, the district has experienced an ongoing enrollment decline. Student demographics have also shifted over the last several years, requiring some changes in food preferences throughout the district.

FCMATs fieldwork, staff interviews, site observations, and document review identified areas for potential improvement in operational efficiency, employee training, program compliance and some discontent between and among staff. FCMAT also found it difficult to obtain accurate and timely information from the department during and after fieldwork. FCMAT observed a significant degree of delegation by the director of nutrition services with a lack of oversight or review in some areas. FCMAT made multiple requests for document that resulted in information that was incomplete, inaccurate or different from what was requested. In one instance, information was provided to FCMAT in a detailed format that violates the law; this made it apparent that either the file provided was not reviewed to ensure it was accurate and/or appropriate, or the director and support staff does not fully understand all the legal requirements of the program.

During FCMAT's site observations, school site staff made multiple comments indicating that nutrition services supervisors and other administration are not often present at the sites. Improved communication is needed among the Nutrition Services Department's management staff, between the department's management staff and school site nutrition services staff, and between nutrition services and school site administration. Strengthening interaction beyond administrative silos ensures objectives are clearly communicated, understood, and provides opportunity for open dialog and a feeling of inclusion.

The child nutrition program should be financially self-sustaining, generating sufficient revenue from meal sales and reimbursements to support operational expenditures including indirect costs and adequate reserves. In 2013-2014, the department went through an administrative review conducted by the California Department of Education (CDE). The department found that the cafeteria fund's net cash resources were out of compliance because they exceeded three months' average expenditures. The district prepared and implemented a spending plan to reduce balances to a compliant level; however, some expenditure components included labor. Unless otherwise reduced, this is an ongoing expenditure that contributes to the district's structural deficit.

The district operates a food service program for employees called the DO Café (District Office Café) that is located in the district office building. A basic review of revenue and expenses for the café operation indicates that since 2013-14 the café has not been profitable; with expenses exceeding revenue from \$17,000 to \$48,000 a year. The deficit is absorbed by the Nutrition Services Department. The district should implement changes that bring this into a self-supporting operation, or discontinue the offering.

Student participation is the primary factor driving revenue, while food and labor costs are the most significant component of a child nutrition budget and must be carefully managed to ensure financial stability. The district reports experiencing a decline in participation of the recent years, however expenditures have not followed suit, which contributes significantly to the department's structural deficit.

The meals per labor hour (MPLH) ratio is used to measure efficiency in a food service operation. When participation is consistent, low MPLH ratios typically identify excessive labor costs and/or operational inefficiencies. The calculations help administration focus on areas producing at a lower than expected MPLH ratio. Calculations should be routinely prepared and analyzed to help evaluate operational efficiencies. FCMAT identified a lack of understanding by the director and some supervisory staff of this type of analysis, and department staff had difficulty providing the detailed data necessary to prepare these calculations. While the department leadership indicated that it has established a goal of 28 MPLH, with limited exceptions, the department does not prepare this type of analysis.

FCMAT's analysis of the district's MPLH concluded that overall labor is high compared to meals served. Approximately 25% of the district schools met or exceeded the district's goal of 28 MPLH. An analysis of the elementary sites found 26.8% met or exceeded the district established goal while 73.2% fell below; three sites had fewer than 20 MPLH. While the district has established a goal of 28 MPLH ratio results of approximately 30 are an ideal efficiency target.

This department should consistently monitor and analyze the MPLH of all sites in a standardized format as the district strives to improve efficiency in the food service program. To provide a more accurate analysis, the department's MPLH calculation for the secondary schools needs to include student labor hours.

At many sites, student labor supplements staff labor in preparing and serving meals. Students working at high school sites are paid for their labor out of cash proceeds from a la carte sales instead of processing student payments through the district payroll. The site staff reduce the deposit by the amounts paid. This is not a legitimate practice and creates an internal control weakness that should be immediately addressed. Cash collections should be recognized and recorded in their entirety. Payments for wages should be processed through district payroll to ensure compliance with state and federal laws applicable to wages.

The department's management and auxiliary staff is also quite large. This area should be reviewed regularly to ensure that the distribution of duties is appropriate and efficient and all functions are necessary.

Student participation and eligibility for free and reduced priced meals should be carefully analyzed by site. The district reports a decrease in student participation in the meal program. One factor that often contributes to higher participation is eligibility for the free and reduced meal price (FRMP). FCMAT's review of student eligibility indicates in many cases, eligibility levels exceed the state's established standard for high need of 55% or higher, but participation levels do not consistently coincide. Of the district's 41 elementary sites 22, or 53.7%, have FRMP eligibility exceeding 59%. FCMAT identified low participation among many sites, as well as the breakfast program at some sites being exceptionally low. The district should consider a cost benefit analysis based on participation to determine if it is fiscally prudent to provide breakfast at each site. Participation levels at all schools should be carefully monitored, and where low, assessed further to identify contributing factors and opportunities to improve participation.

Strict federal and state regulations govern competitive food sales in school districts. However, the FCMAT study team observed a “student mall” at one high school selling food to students during lunchtime. The district needs to ensure that all groups selling foods and beverages on a school campus follow laws, regulations and policies on competitive food sales. Routine training should also be provided to school administrators and food service staff regarding competitive food sale regulations.

FCMAT observed opportunities to improve operational efficiencies at school sites, including modifications to serving line set-ups that could be more efficient. Other areas with room for improvement are menu offerings and serving practices. Each is explored in depth in the pages ahead.

Findings and Recommendations

Budget

The revenue collected by the district through the sale of and reimbursement for school meals and other food related services such as catering, or any other sources of revenue (such as vendor rebates) is accounted for in cafeteria fund 13 and is strictly governed by federal and state law. The cafeteria fund is a separate, restricted fund used to account for the financial activity of a district's food services operations. As defined in Title 7 and 2 of the Code of Federal Regulations, the revenues generated by the Nutrition Services Department is principally for the benefit of school-children and used only for the operation or improvement of the nonprofit school food service program.

The child nutrition program should be financially self-sustaining, generating sufficient revenue from meal sales and reimbursements to support operational expenditures including indirect costs and maintain adequate reserves. The USDA has been clear on the topic of protecting these funds, especially when they are used for nonprogram meals. Section 206 of the Healthy Hunger Free Kids Act requires that a district's sale of nonprogram foods generate revenue so that it does not detract from or have a negative impact on the cafeteria fund.

Nonprogram foods are defined as food and beverages, other than a reimbursable meal, sold in a participating school and purchased using funds from the cafeteria fund. The different types of nonprogram foods can include, but are not limited to: a la carte food items sold in competition with school meals, adult meals, items purchased for fundraisers, vending machines, student operated school stores, catering, special school banquet functions, and vended meals.

FCMAT reviewed the cafeteria fund budgets for the current and preceding two fiscal years. The Nutrition Services Department has historically managed a balanced budget, operating without a deficit and maintaining a strong fund balance. Since 2013-14 program expenditures have exceeded revenues, indicating structural deficit spending; however, this has partly been intentional. In the 2012-13 school year, the department had \$633,012, in excess revenue over expenditures, increasing its reserve balance to \$4,255,131. This was in excess of allowable reserves, which should be no more than three months of expenditures.

In 2013-14 the Nutrition Services Department went through a state administrative review that resulted in the development of a spending plan to reduce reserve balances to compliant levels. The excessive balances have since been reduced and the spending plan has been suspended; however, ongoing expenditures continue to contribute to a projected deficit of \$64,692 for current year. While the cafeteria fund still maintains adequate reserves and does not encroach on the general fund, the deficit spending must be eliminated to ensure adequate reserves are maintained.

While spending is an important factor in the solvency of any program, revenue also contributes to a balanced budget. The district's current year revenue projections are \$14,766,634, which is higher than the last three fiscal years. In 2014-15 revenue dropped by \$148,204 from the preceding fiscal year, but increased by \$682,107 in 2015-16. Because of the revenue increase, the ongoing deficit is likely the result of uncontrolled or increasing costs. To address this deficit, the district will need to identify areas of cost reductions or revenue enhancements. As discussed else-

where in this report, revenue may be enhanced through menu changes, serving line efficiencies, expansion of a la carte offerings and increased student participation.

According to the 2013-2014 administrative review, increases in nutrition services spending during 2013-14 were “due to increased food and labor costs associated with the new meal pattern, increased time of maintenance labor cleaning food service areas, and increased allowable charges for technology.” Part of the increase in food service hours was attributed to the new nutrition guidelines. The department’s salary and benefit costs have increased by \$825,906 since 2012-13 although the 2016-17 projected budget reduces salaries and benefits by \$224,244 from the prior fiscal year. This indicates that the district has focused some spending reductions on labor.

Food and labor make up most of the expenditures in a child nutrition budget. To manage the program effectively, each of these expenditure areas should represent 40-45% of revenue. In the current and three prior fiscal years, food costs have been between 35-43%. However, during this same timeframe, the labor budget has exceeded this standard with labor falling at 48% of revenue in 2013-14 and increasing to between 50-53% each year thereafter, another indication of excess staffing.

Staffing details and MPLH calculations are presented in sections that follow. FCMAT’s analysis of MPLH concluded that overall staffing ratios are high compared to meals served. The department’s management and auxiliary staff is also quite large, accounting for 28% of salaries. This area should be reviewed regularly to ensure that the distribution of duties is appropriate and efficient and that all functions are necessary. One problem with adding staff at the same time as implementing a spend-down plan is that the salary-and-benefit expenditures are not one-time in nature and may make it difficult to eliminate in subsequent years. Because the district increased labor while implementing a strategy to reduce the excess reserve, which is not an ongoing funding source, ongoing analysis should focus on staffing efficiencies.

The district operates a food service program for employees called the DO Café that is located in the district office building. The café resembles a staff break room, with vending offerings and seating, but also offers made-to-order meal offerings from an established menu and a selection of prepackaged salads that are made on site. Two cafeteria workers staff this site, one (7.5 hour) person serving breakfast and lunch and another assisting for two hours during the lunch period.

The menu offerings include breakfast items such as breakfast sandwiches, burritos, breads, oatmeal, potatoes, meats and fruit, while made-to-order hot and cold sandwiches, chips, fruit, cookies and beverages are offered at lunch. Food service also stocks vending machines with a selection of items so staff have access to food when the café is closed. Vended items included bread with butter and jelly, bagels and cream cheese, juice, water and candy bars. The room is equipped with a refrigerator, microwave and toaster for staff use.

The café serves relatively few customers. A basic review of revenue and expenses for the café operation indicates that it has not been profitable. Financial records provided by the district for 2012-13 through August 2017 report expenditures exceeded revenue between \$14,000 and \$48,000 each year. The deficit is absorbed by the Nutrition Services Department. As a result, district employees benefit from the café’s convenience and low-cost offerings, but the department does not. Because the program operates with a substantial deficit, it may not comply with state Government Code Section 8314(a) which states as follows:

It is unlawful for any elected state or local officer, including any state or local appointee, employee, or consultant, to use or permit others to use public resources for a campaign activity, or personal or other purposes which are not authorized by law.

8314(b)(1) continues to state the following:

For purposes of this section:

(1) “Personal purpose” means those activities the purpose of which is for personal enjoyment, private gain or advantage, or an outside endeavor not related to state business. “Personal purpose” does not include the incidental and minimal use of public resources, such as equipment or office space, for personal purposes, including an occasional telephone call.

Student Labor

Another area of concern for the Nutrition Services Department is student labor, which is used inconsistently throughout the district, primarily on high school campuses. FCMAT found during site visits that school sites utilize cash proceeds from a la carte sales to pay student wages and reduce the deposit by the amounts paid rather than processing wages through the district payroll. This is not a legitimate practice and results in an internal control weakness that should be immediately addressed. Cash collections should be recognized and recorded in their entirety. Payments for wages should be processed through district payroll to ensure compliance with state and federal laws applicable to wages. More information regarding student employment can be found on the CDE websites at <http://www.cde.ca.gov/ci/ct/we/workpermitsforstudents.asp> and page 40 of the IRS publication 15 (Circular E), Employer’s Tax Guide (2016) regarding income tax withholding and employee/employer taxes including Social Security and Medicare and FUTA <https://www.irs.gov/pub/irs-pdf/p15.pdf>.

The other problem with students not being paid correctly is that the cafeteria budget may not accurately reflect all of their labor costs. As FCMAT noted, the offset to deposits were charged to a 58XX services object code. While the expenditure is a small amount of salaries compared to the overall costs, the percentage of labor in the department is slightly skewed as a result.

Recommendations

The district should:

1. Routinely review the cafeteria budget and establish a spending plan that eliminates deficit spending.
2. Review staffing levels departmentwide, including site, management and auxiliary to identify labor efficiencies. Review all open positions against efficiency ratios prior to refilling.
3. Identify strategies to increase revenue to help offset increasing expenditures, including improving the efficiency of meal lines, modifying a la carte offerings to remove low sales offerings, and increasing and/or improving marketing to improve awareness and increase participation.
4. Evaluate the efficiency of the DO Café and make the appropriate adjustments to allow it to at least break even or consider closing it.
5. Immediately discontinue the practice of paying student wages in cash and begin processing student payments through the district payroll.

Workflow, Distribution of Functions and Operational Efficiencies

The Nutrition Services Department is responsible for a large operation with a diverse staff, which can be difficult to coordinate and manage. Oversight and communication are essential to the success of such a large program.

Despite the best efforts in managing such a diverse group, obstacles may occur, prompting feelings of discontent. It is important that the director and management support team establish relationships with all departmental and site staff, establish an environment of inclusion and ensure that problems are addressed in a professional, timely manner to avoid a breakdown in employee morale.

Staff interviews, site observations, and document review identified deficiencies in operational efficiency, employee training, program compliance and some discontent between and among staff. FCMAT had problems obtaining accurate and timely information from the department during and after fieldwork. FCMAT observed a significant degree of delegation by the director of nutrition services with some lack of oversight or review. FCMAT made several requests for documents that resulted in incomplete, inaccurate or different information than requested. In one instance, information was provided to FCMAT in a detailed format that violates law; this indicates that either the file provided was not reviewed to ensure accuracy and/or appropriateness or the director does not fully understand all of the program's legal requirements.

Department Organization and Staffing

The district is geographically large. Therefore, the Nutrition Services Department has a significant number of staff members at 247 (158.8 full-time equivalent (FTE)). Under the leadership of a director of nutrition services, the department management team includes one registered dietitian, and seven supervisors. Five supervisors oversee the operations of individual school sites as assigned. One supervisor oversees warehouse operations and one supervisor oversees substitute workers, vendor contracts and the free and reduced-price meal program. School sites have varying levels of staff supporting the child nutrition program based on the size and demographic make-up of their programs. The department is also supported by auxiliary staff that include clerical, fiscal, equipment technicians, computer technicians, and warehouse and delivery staff.

The following table provides a breakdown of staffing for the child nutrition program based on the district's 2016-17 position control report:

Position Control and Salary Projections

Position	FTE	Salary	Benefits	Total Salary & Benefits
Administrative Assistant	1.0	\$46,673.35	\$32,553.45	\$79,226.80
Cafe Equipment Technician II	2.0	17,620.22	72,479.37	190,099.59
Cook	7.6	210,401.81	173,854.24	384,256.05
Director of Food Services	1.0	113,698.38	33,600.85	147,299.23
Food Service Inventory Control Technician	1.0	44,491.92	27,402.22	71,894.14
Fiscal Technician I	1.0	41,580.00	12,827.23	54,407.23
Fiscal Technician II	1.0	46,632.00	32,541.56	79,173.56
Food Service Nutritionist	1.0	62,460.00	26,734.73	89,194.73
Food Service Worker	66.5	1,497,341.39	\$628,943.20	2,126,284.71
Food Services Supervisor I	8.9	344,959.13	174,883.73	519,842.86
Food Services Supervisor III	6.0	377,876.88	168,387.67	546,264.55
Food Services Warehouse Supervisor	1.0	59,078.11	25,241.73	84,319.84
Intermediate Clerk Typist	1.5	51,054.60	48,938.09	99,992.69
Micro Computer Specialist	2.0	129,624.00	46,336.84	175,960.84
Nutrition Assistant	0.8	25,938.00	21,263.99	47,201.99
Satellite Food Service Worker	48.8	1,340,723.57	1,098,595.25	2,439,318.82
Senior Clerk Typist	0.8	26,661.60	26,804.07	53,465.67
Warehouse/Delivery Worker	7.0	248,975.07	115,516.92	364,491.99
Positions Total	158.8	\$4,785,790.03	\$2,766,905.26	\$7,552,695.29

Differences result from rounding

Included in these positions are 13.9 open positions, as depicted in the following table:

Open Positions

Position	FTE	Salary	Benefits	Total Salary & Benefits
Cook	0.9	\$20,996.01	\$19,844.15	\$40,840.16
Food Service Worker	8.2	176,016.92	45,659.26	\$221,676.18
Food Services Supervisor I*	0.0	4,426.77	3,054.94	7,481.71
Intermediate Clerk Typist	0.8	20,832.00	17,627.15	38,459.15
Nutrition Assistant	0.8	25,938.00	21,263.99	47,201.99
Satellite Food Service Worker	3.3	83,305.83	91,855.67	175,161.50
Total Open Positions	13.9	\$331,515.53	\$199,305.16	\$530,820.69

** Fractional FTE is included in full FTE of preceding table. Salary and benefit amounts result from mid-year staffing.*

The district's 2016-17 adopted budget includes salary and benefits of all staffed positions and approximately 75% of the value for open positions; recognizing that a portion of those wages will not be expended during the fiscal year.

Included in the total are 33.2 positions assigned to the central administration, as depicted in the following table:

Central Administration Staff

Positions	FTE	Salary	Benefits	Total Salary & Benefits
Administrative Assistant	1.0	\$46,673.35	\$32,553.45	\$79,226.80
Cafe Equipment Technician II	2.0	117,620.22	72,479.37	190,099.59
Director Food Services	1.0	113,698.38	33,600.85	147,299.23
Food Service Inventory Control Technician	1.0	44,491.92	27,402.22	71,894.14
Fiscal Technician I	1.0	41,580.00	12,827.23	54,407.23
Fiscal Technician II	1.0	46,632.00	32,541.56	79,173.56
Food Service Nutritionist	1.0	62,460.00	26,734.73	89,194.73
Food Service Worker	0.3	4,854.40	15,206.66	20,061.06
Food Services Supervisor III	6.0	377,876.88	168,387.67	546,264.55
Food Services Warehouse Supervisor	1.0	59,078.11	25,241.73	84,319.84
Intermediate Clerk Typist	1.5	51,054.60	48,938.09	99,992.69
Micro Computer Specialist I	2.0	129,624.00	46,336.84	175,960.84
Nutrition Assistant	0.8	25,938.00	21,263.99	47,201.99
Satellite Food Service Worker	5.9	160,848.77	144,275.34	305,124.11
Senior Clerk Typist	0.8	26,661.60	26,804.07	53,465.67
Warehouse/Delivery Worker	7.0	248,975.07	115,516.92	364,491.99
Grand Total	33.2	\$1,558,067.30	\$850,110.72	\$2,408,178.02

Differences result from rounding

Meals Per Labor Hour

Because labor is generally one of the highest expenses in a food service operation, it is important to ensure that staffing ratios are adequate to meet program needs without being excessive. Labor costs represented 53 percent of the total budget for food services in 2015-16, and are projected at 50 percent in the current 2016-17 budget year. These percentages are higher than industry standard which is approximately 40-45%.

In a food service operation, MPLH is an industry standard measurement used to assess labor efficiency and help determine appropriate staffing levels. The calculations use only labor hours for food service staff at school sites. Labor hours for management, clerical and other auxiliary staff are not included because the calculation is a measure of the labor it takes to prepare and serve the meals at sites. It is a best practice and industry standard to maintain MPLH of approximately 30, and FCMAT used 28 as a standard goal across all grade levels for MPLH calculations and comparison. The district prepares its own MPLH studies using slightly different meal equivalency factors established by grade levels served; 23 for grades K-6, 29 for middle school and K-8 sites and 16 for high schools, all of which fall below industry standard. Standardized calculations are not consistently prepared for all school sites and analyzed by the department.

MPLH can be determined in several ways. Breakfasts, lunches, snacks and a la carte sales must be included in the analysis, but breakfasts are sometimes counted as a fraction of a meal equivalent because they are often simpler to prepare than lunch. In FCMAT's analysis, the elementary breakfasts were counted as half a meal because they have mostly ready prepared foods and include one

hot entrée plus a packaged cereal. Breakfasts at middle schools and high schools were given equal weight because several entrees are offered, many including hot items.

FCMATs calculations also included only a la carte sales at the middle and high schools since elementary schools a la carte sales are insignificant. A la carte sales are converted to a meal equivalent based on gross revenue earned. The equivalency factor is an average of secondary breakfast and lunch prices, which at the district's secondary schools is \$2.88. Therefore, daily a la carte sales totals are divided by 2.88 to obtain an a la carte equivalent.

The district also vends snacks and meals to the Early Childhood Education (ECE) and after school programs. Because snacks are simple ready-to-serve items and are prepared using the same labor hours, they were counted as a third of a meal. A sales summary of these meals was used to estimate the average daily meal counts, which were included in the total meal counts for sites that prepare them.

The detailed MPLH analysis prepared by FCMAT is attached as Appendix A to this report. It is also summarized in the pages that follow. This analysis was prepared using meal count data for the month of September 2016 because the claims data provided to FCMAT for October 2015 was incomplete and, at the time of FCMAT's fieldwork the district had not completed the claim for October 2016. FCMAT made multiple requests for the claim through mid-November; however, the district continued to report that the claim was not yet completed. Using data from October is preferable in these calculations because it is more representative of the current year student free and reduced priced meal (FRPM) eligibility participation and is compared to the district's annual certified enrollment data submitted through CALPADS.

Because no consistent accounting was available, the labor hour of student helpers was a factor that was not incorporated into FCMAT's equation. While inconsistent between sites, many schools rely on student help for meal preparation and service. Including student labor in the analysis would negatively impact the results by increasing the total labor hours per site and reducing the correlating MPLH efficiency ratio. The inclusion of student labor could have a material impact on the results of FCMAT's MPLH calculations. As the district analyzes data in the future, it should incorporate student hours into the equation.

For comparability, FCMAT isolated meal count data for each site into four groups; elementary, middle school, high school and special programs. FCMAT found that MPLH varied between each of these groups. The highest performing group was the middle schools whose average MPLH was 30 while the elementary school average was 26, and the high school average was 19.

The table below summarizes FCMAT's findings.

MPLH	Elementary		Secondary		Special Programs		Combined	%
>= 28	11	26.8%	6	33.3%	0	0.0%	17	25.4%
20-27	27	65.9%	5	27.8%	5	62.5%	37	55.2%
<20	3	7.3%	7	38.9%	3	37.5%	13	19.4%
	41		18		8		67	

Elementary schools commonly experience greater efficiency because they generally have simpler menus and serving lines. Based on FCMAT's formula, approximately 25 percent of the district's schools met or exceeded MPLH of 28 or higher. For elementary sites, 26.8% met or exceeded MPLH of 28 while 73.2% fell below MPLH of 28, and three sites fell below 20 MPLH.

Only 33.3% of secondary sites met or exceeded MPLH of 28, and 38.9% fell below 20 MPLH, even while excluding student labor. As previously mentioned, the MPLH ratio declines when considering the additional labor provided by student workers.

FCMATs analysis indicates that breakfast participation at some school sites is low. Four elementary sites average fewer than 50 meals; Orangevale at just 18, Earl LeGette, Albert Schweitzer and Trajan are also extremely low production sites. Several middle schools serve fewer than 60 breakfast meals. Schools with such low breakfast participation should consider eliminating breakfast, serving it during recess or break time and/or shifting to cold, prepackaged, “grab and go” breakfast items, which are boxed meals prepackaged by the nutrition services staff. The district could consider establishing a districtwide standard for minimum participation levels as a basis for offering a breakfast program at each site. While school districts are not required to participate in the School Breakfast program FCMAT understands that the program offering is beneficial to students. Performing a cost benefit analysis based on participation could determine if it is fiscally prudent to provide breakfast at each site. Alternatives to consider include the following: —

- Eliminating programs that are too small
- Switching to a sack breakfast prepared by food service staff the day before, possibly utilizing an on-site employee to mark off a roster for kids that get a meal, but does not identify the students’ free and reduced meal price eligibility (FRMP).
- Serving breakfast at a mid-morning recess or nutrition break.

One factor that often contributes to higher participation is the eligibility for FRMP. School sites with higher student eligibility populations would be expected to have higher participation and therefore more favorable MPLH ratios; however, FCMATs analysis did not consistently support this theory. The analysis found that the highest-performing elementary school site was Howe Avenue Elementary School at 36 MPLH and a FRMP eligibility of 95.3% percent; however Dyer-Kelly also has an eligibility of 95.3% and a ratio of 28.

Of the district’s 41 elementary sites 22, or 53.7%, have an FRMP eligibility exceeding 59%, yet the average breakfast participation for September for these same sites was only 30.1%; the average daily lunch count was 64.7%. Additionally, Charles Peck and Grand Oaks elementary schools have higher FRPM eligibility, 78% and 71% respectively, but attain low MPLH ratio results of 21. All schools should be assessed further to identify opportunities to improve efficiencies in staffing patterns and participation. The following table is a summarization of the MPLH results for the district’s middle schools.

Site #	Schools	Oct 2016 CALPADS I.17	Oct 2016 FRMP	FRMP %	Total Average Daily Meal Equivalent	Site Labor Hours Per Day	MPLH
60	Will Rogers	732	476	65.0%	565	15.5	36
64	Churchill(Winston)	1002	385	38.4%	387	12.0	32
50	Sylvan	695	502	72.2%	578	18.0	32
4	Barrett (John)	635	315	49.6%	506	16.0	32
61	Carnegie (Andrew)	1032	299	29.0%	405	13.0	31
65	Pasteur (Louis)	685	262	38.2%	423	14.0	30
1	Arcade	451	256	56.8%	293	12.0	24
2	Arden	941	337	35.8%	308	14.5	21
Total *		6173	2832		3465	115.0	
Average Middle School MPLH							30

* Mathematical formatting in Excel results in immaterial rounding differences in totals.

Overall, the middle school MPLH ratios were excellent, with most sites exceeding 30 MPLH. However, Arden and Arcade have low MPLH ratios of 24 and 21 respectively. Carnegie and Churchill Middle Schools have similar enrollments and lower FRMP eligibility compared to Arden, yet experience far more favorable MPLH performance ratios, exceeding 30. For these three sites, the number of meal totals, a la carte sales and staff hours all vary. The first operational year for Arden began in 2015-2016 after a new multipurpose room and kitchen were built. This may contribute in part to the inefficiencies indicated in this ratio. Observing the conditions and practices of these three sites should enable the district to identify and understand the controllable differences and implement changes to improve the efficiency at Arden and Arcade.

Similar to the four sites noted above, the district has a good mix of comparable sites to provide a foundation for analysis. By comparing similar school sites, the district can analyze multiple factors to identify areas to improve efficiency. Where school sites have similar demographics, inconsistencies in factors such as FRMP, participation, MPLH serve as an identifiable point of focus to improve inefficiencies. Establishing standardized district MPLH goals for all sites in the 28-30+ range and an expectation of achieving established goals institutes consistent accountability for the program. All schools should be held to similar standards.

The following table is a summarization of the MPLH results for district high schools.

Site #	SCHOOLS	Oct 2016 CALPADS	Oct 2016 FRMP	FRMP %	Total Average Daily Meal Equivalent	Site Labor Hours Per Day	MPLH
205	Mira Loma	1779	866	48.7%	957	39.5	24
202	Encina (6-12)	987	912	92.4%	1150	51.0	23
207	Del Campo	1740	789	45.3%	884	42.5	21
204	San Juan	644	485	75.3%	472	24.5	19
201	El Camino	1494	679	45.4%	674	37.0	18
206	Bella Vista	2007	480	23.9%	650	36.5	18
210	Mesa Verde	936	589	62.9%	637	39.0	16
209	Casa Roble	1249	414	33.1%	600	39.5	15
208	Rio Americano	1685	336	19.9%	471	34.25	14
219	La Entrada Continuation	67	54	80.6%	14	4.0	3
230	El Sereno Alternative (1)	203	85	41.9%	0	0.0	
Total *		12791	5689		6511	347.8	
Average High School MPLH							19
Total *		18964	8521		9964	462.8	
Secondary Average MPLH							22

(1) These sites are located and/or have food services provided by other sites.

* Mathematical formatting in Excel results in immaterial rounding differences in totals..

The high schools were the lowest performers in FCMAT's analysis; even with the exclusion of student labor. They present the greatest challenge because of their size, the number of serving locations and student attitudes about school food options. Students in this age group often do not want to participate or complete FRPM applications even if they qualify. Some districts have open high school campuses, but the San Juan Unified does not. While multiple points of sale for this age group are intended to increase student participation through increased offerings and/or access, this requires more staff, creating high labor costs. These offerings can have a negative financial impact on the food services program if they do not result in increased revenue sufficient to cover the increase in related costs. Four of the 10 campuses have FRMP eligibility exceeding 60%, yet experience extremely low MPLH. Analyzing each of the high school sites to assess their unique differences that may affect their ratios should help identify opportunities for improvement in offerings and/or efficiencies to ensure the programs are cost-effective.

As will be discussed further in the menu section, the types and number of items offered at high schools should be simplified and reduced. The menu items are redundant with multiple versions of breaded chicken on the daily menu. The preparation and serving time required to offer many similar items is likely increased, and when combined with low participation, adds little value.

The following table is a summarization of the MPLH results for special program locations.

Site #	SCHOOLS	Oct 2016 CALPADS Enrollment	Oct 2016 FRMP	FRMP %	Total Average Daily Meal Equivalent	Site Labor Hours Per Day	MPLH
Special Education Centers (2 sites)							
163	Laurel Ruff Transition	99	54	54.5%	72	6.0	12
222	La Vista	66	54	81.8%	77	5.5	14
	Ralph Richardson Center (1)	82	30	36.6%	0		
Early Childhood Education Sites (6 sites)							
I	Coleman, Sunrise Tech & Garfield				167	7.0	24
I	Marshall & Fair Oaks				180	9.0	20
I	General Davie Primary Center				119	5.0	24
Total					616	32.5	
Average Special Program MPLH							19

(1) These sites are located and/or have food services provided by other sites.

* Mathematical formatting in Excel results in immaterial rounding differences in totals.

Analysis of the districts special program sites, including special education and Early Childhood Education (ECE), also identified low MPLH numbers with Laurel Ruff MPLH at 12 and La Vista at 14. The special programs average a MPLH ratio of 19 overall as a result of the inclusion of early childhood education MPLH results.

Greater efficiencies may be obtained by combining food preparation for these locations with larger, nearby regular schools. For example, Laurel Ruff and La Vista are close to Del Campo High School and Rogers Middle School. Marshall is close to Arden Middle School. Coleman and Sunrise Tech are close to Carnegie Middle School, Bella Vista High School and Sylvan Middle School. Combining the production and service of these programs to consolidate labor would likely result in increased productivity. This may be a better alternative or a first step towards a larger centralized or hub kitchen concept.

The MPLH analysis also indicates that some overstaffing is likely. As discussed in the budget section, labor costs are projected at 50% of revenue for the current fiscal year and were 51-53% in the two preceding years, which is higher than the industry standard.

The FCMAT study team observed some practices in the line setups that could be more efficient and perhaps allow for fewer staff members behind the lines. Some sites served items to students that could be self-serve, such as salad bar offerings, breads and rolls, and even wrapped entrees at some sites. If the point-of-sale stations were located at the end of the lines, that person assigned there could act as the checker to ensure meals were complete instead of assigning another person to the end of the line.

Although the department deficit spends, it is not encroaching on the unrestricted general fund; therefore, immediately reducing staff is not critical. However, revenue enhancement and or expenditure reductions will be necessary to ensure ongoing fiscal solvency independent of the general fund. Ongoing efforts should be made to streamline all systems to reduce deficit spending, preventing future encroachments.

The district should implement collaborative analysis that includes participation with site supervisors and the director. This involves analyzing by site student eligibility and participation, and staffing levels in conjunction with observations of meal preparation and serving, to identify where staffing reductions, efficiency improvements and/or participation improvements can be implemented.

Recommendations

The district should:

1. Develop an environment of inclusion between the department's leadership and staff.
2. Ensure the departmental leadership provides adequate oversight when delegating duties to staff, including a review of work.
3. Prepare MPLH calculations by site utilizing data certified in CALPADS for free and reduced price meal eligibility and October student participation data. Include student labor in calculations. The focus should be on sites with similar demographics but inconsistent factors including eligibility, participation, staffing, menu offerings and service efficiency to identify areas for potential improvement.
4. Consider eliminating breakfast programs that are too small, switching to a sack breakfast, and/or serving breakfast at a recess or nutrition break.

5. Closely analyze the cost benefit of menu offerings, including the types and number of items offered to ensure each offering is cost-effective.
6. Assign Nutrition Services Department management to review staffing levels and observe sites regularly to assess productivity and continually identify ways to streamline systems and improve efficiencies.
7. Assign Nutrition Services Department management, including site supervisors, to routinely conduct collaborative analysis of staffing/labor hours by site and site operations observations to identify potential staffing reductions, efficiency improvements and/or participation improvements. This should incorporate a review of meal line setups to determine if changes can be made to increase participation.
8. Consider increasing standardized MPLH goals for all sites to a range of 28-30+ and establishing an expectation that sites achieve these goals to institute consistent accountability districtwide. Conduct routine MPLH analysis, and provide this information to the sites. Continue special recognition of sites that rank the highest.
9. Consider having other nearby schools service low-performing sites to maximize efficiencies. Reduce staff accordingly.

Meal Program, Menu Planning 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 California Department of Education (CDE). During federal reauthorization in 2010, regulations were updated to become the most comprehensive changes to the program in 15 years. Initial guidelines became effective in the 2012-13 school year and have continued to become stricter.

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

<http://www.fns.usda.gov/sites/default/files/NSLA.pdf> <http://www.fns.usda.gov/sites/default/files/HealthyHungerFreeKidsActof2010.pdf>

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

Menu Planning

In addition to the regulations previously stated, 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, student acceptance. A full cup of fruit must be offered at breakfast for all grade levels. Half a cup of fruit and three-fourths of a cup of vegetables must be offered to K-8 students at lunch, and one cup of both fruit and vegetables must be offered during that meal for high-school students. Students must take at least a half cup of fruit *or* vegetable with both breakfast and lunch regardless of whether they want it.

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

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

The district's menus are nutritionally adequate and acceptable under the new National School Lunch Program (NSLP) regulations. All menus pass the criteria for the NSLP certification for having the proper items and serving sizes available daily. A variety of fresh fruits and vegetables are available.

The K-6 and K-8 menus consist primarily of heat and serve products with some assembly on the site premises (such as tacos). This year there has been a move to eliminate pork products from the menu to better serve a change in population demographics. The menu changes monthly but the same most popular items are repeated. There are no specific days when an item is offered weekly or monthly. In K-6, only one entrée is offered per day in addition to the salad bar offerings of fruit (both fresh and canned in juice) and vegetables. The K-8 menu closely follows the K-6 menu but offers two entrée choices. Some days two hot entrees are offered and some days, the offerings are one cold entrée and one hot entrée.

Offering more entrée choices daily in K-6 could attract more students. These extra options should be simple, cold items that are offered consistently every day. Suggestions would be turkey ham and cheese cups (to go with a salad) or a turkey or cheese sandwich or yogurt and string cheese. If a bread is not offered separately on the hot menu, a cracker package could be offered (to meet the meal requirements). Even a daily SunButter sandwich could be an option although it is not a student favorite. Students who do not read the menu would always know they have a choice, especially those that follow a vegetarian diet. The initial problem of identifying how much product to prepare, based on student preference, would be resolved within a couple of months. These items do not require extra labor to prepare and can be placed next to the hot item so that the staff member monitoring meals can easily verify that the student selected a qualified reimbursable meal.

While K-8 schools offer two entrees, they should offer a consistent cold item, especially one that has proven acceptable to the youngest students. When a certain day of the week is established as having one of the most popular items, small children look forward to it. Once a student creates a pattern of coming to the cafeteria when favorite meals options are served, they are more likely to come in on other days.

The district serves standard menu items but does not offer them on a consistent routine schedule, or in a true cycle pattern. Establishing a more routine two or three week cycle generates trust with the students and decreases the need to order and store more products. For example, a student will know that every Monday or every other Monday, one of his/her favorite items will be offered. Because some days are more popular than others, this helps site leaders establish a product history from which it will be easier to order the correct quantities in advance. This also assists with purchasing and warehousing because the flow of product is more predictable. The cycle can be changed quarterly to add less popular items for variety.

The site leader, commonly a supervisor I at high school sites and a satellite food service worker at middle school sites, determines the mix of entrees offered daily, but all entrees will be offered at least once by the end of each week. The high schools have a menu that has more than 20 entrée choices offered throughout the week. Middle schools usually offer five choices daily, while high schools offer seven. This means that pizza can be offered daily, but a corn dog is perhaps offered only one day. The mix of entrees is adapted to the popularity and kitchen conditions at each school.

At most high schools visited by FCMAT serving lines or outlets with themed menus, such as "Border Cafe" offered a menu of Mexican-style selections. FCMAT also observed an "Asian Express" menu, a pizza variety, and burger/sandwich selections. At one high school, a salad bar selection was offered in a separate line.

Even with these entrée choices, most students indicated a lack of variety; although this perception could be the result of students generally seeing the same foods weekly. Since most high schools visited by FCMAT had kitchens with sufficient oven capacity, a cycle of specials could be built into the menu plan.

Other districts have had success with pasta dishes or pasta bars and soba noodle dishes. At one high school, FCMAT observed too much reliance on breaded chicken products on that particular day, offering all of the following: chicken nuggets, popcorn chicken, spicy chicken nuggets, breaded chicken sandwiches and two entrée salads topped with either popcorn chicken or breaded chicken strips. While the site leader has discretion to choose the mix of daily offerings, more caution should be taken to offer variety. The supervisor III should monitor menu offerings more closely, perhaps restricting the flexibility of the site leaders. Since participation is lower at high schools and meals per labor hour higher, offering fewer choices per day, but changing them more often or adding variety to the basics would be beneficial.

The student comments heard most frequently at the high schools visited focused on making salad bars available to all students in addition to the entrée line in the main cafeteria. Most schools observed by FCMAT had sufficient room to establish a salad bar and the availability of a high school worker to maintain it during the lunch period.

For schools that offer a salad bar, a better combination of green leafy vegetables could be mixed with the iceberg lettuces. This will slowly get students accustomed to the higher-nutrient varieties of lettuce. There must be a constant search for items that are more desirable to students such as Ultragrain tortillas, which meet the whole grain standards but look and taste similar to standard tortillas. Incorporating these items into the menu is essential to improving meal popularity.

Overall, most foods served at campuses observed by FCMAT were of the thaw-and-heat variety, with some cooking of rice or other grains on site. Even with these foods, it is critical that they be handled and heated with the utmost care to preserve their appearance and quality. Most schools had established procedures to ensure that food was not heated too far in advance.

The current model of food preparation and distribution has little room for scratch cooking. Scratch cooking of entrees will increase labor and may have a marginal effect on participation. Small steps can be taken to pilot scratch cooking options at schools where low participation is observed. The cost/benefit results should be evaluated for effectiveness based on the school population to determine whether wider participation would be beneficial.

Recommendations

The district should:

1. Consider increasing the daily options offered in K-8 schools to increase participation. The hot entrée should remain as an option as well as a simple offering of one or two preportioned cold items.
2. Establish a true two or three week cycle menu in K-8, using the 10 most popular items offered on the same days of the week, with a few specials added into the cycle. Repeat the two most popular items every week on a consistent day, such as chicken or hamburgers alternating every Tuesday, pizza every Thursday.

3. Ensure menus offer some variety, steering away from offering so many items with similar ingredients, such as breaded chicken, on the same day at high schools. Increase variety in the secondary menu offerings, changing them more often, adding variety to the basics or offering specials that include pasta products.
4. Increase the supervisor III's monitoring of menu offerings by site staff to ensure a balance in daily menu offerings.
5. Consider adding or increasing salad bar offerings accessible to all students entering the main cafeteria high schools where feasible.
6. Pilot the scratch-cooking of select items at some low participation schools to determine the cost/benefit relationship of labor increases and participation.

Student Participation and Serving

All school districts struggle to balance the requirements of the National School Lunch Program (NSLP) regulations and parent requests. It is most important to develop menus with student appeal in mind. No matter how needy, students will not consume foods they do not like and/or are unfamiliar. The acceptability of foods varies greatly depending on the age group. In addition, some foods may be difficult to eat for students who are missing teeth or wear braces. Foods must be in a quick-to-eat form since most students use mealtime as their social time. Even when recess is scheduled first, many students would rather talk than eat. A variety of items offered daily encompass most student preferences and their individual needs.

Studies show that participation decreases when students perceive that they have to wait too long in line. FCMAT visited 20 sites and observed the practices of each site for breakfast and/or lunch services. Most serving lines observed flowed smoothly, and most sites visited had adequate serving areas; however, some schools had long lines, especially middle schools.

Some schools have moved to a single lunch session, which puts further demands on the serving staff. At many schools, FCMAT observed a school staff member(s) and/or student workers controlling cafeteria lines by allowing only a few students into the serving area at one time. While this prevents chaos and crowding, it often results in extending the serving time since those monitoring the lines cannot always see the progression of the line inside or become involved in a conversation(s). Where visual limitations exist, simple communication between the server and the monitor using a walkie-talkie could improve the flow of lines. At some schools observed by FCMAT, the line was not controlled at all, causing chaos.

Many schools had staff and/or students working on one side of the line handing prepackaged and bulk hot entrees to the students; while other schools had items preplated for the students to simply grab. Staff indicated students are not permitted to retrieve their own food to avoid burns and to keep them from touching food items they will not take. While this is reasonable, it is important for students to learn at an early age to serve themselves. When using this approach, staff can help oversee and guide students as they move down the line while making their selections.

Many restaurants encourage customers to use self-service bars. At a high-school level, this approach is important, especially when offering salad bar options, because it provides students the choice of what items they prefer to eat. At some sites FCMAT observed, students were served all items for a salad plate. This practice is inefficient, requiring several staff to serve, and pushes students to take items and quantities they may not want or eat, increasing waste. This process also causes serving lines to move slower.

At other high and middle school sites individual salad items and condiments were predished into small soufflé cups and bags as opposed to using a salad bar concept. Most of these items could be set up in a salad bar or left in bulk serving pans on the counter behind the sneeze guard, allowing students to self-serve. Preportioning product takes a considerable amount of time and increases the serving costs and trash. Students often leave containers on the ground, giving custodians additional cleanup work after the mealtime. Even items like salad dressing can also be placed into large pump bottles that meter out .5-1 ounce portions instead of using prepackaged packets or cups and any mess is isolated to a small area. This is often more appealing for the students as well. While preportioning most items is unnecessary, protein items for the salad bar should be placed in cups and offered at the point-of-sale station so the portion size can be monitored.

Secondary schools often have problems retaining participation when serving times change and are limited because of testing schedules, rally schedules and block schedules. Staff must adapt to accommodate these schedules. Students may skip meals because of shortened passing times. Increasing or establishing grab-and-go options and outside carts on these days may increase participation that may otherwise be lost because of students' perceived time limitations.

Studies show that student test scores improve when they have the proper nutrients in the morning. The district currently offers a second chance breakfast at several of its high school sites. Providing a second-chance breakfast allows students who cannot participate before school to obtain these essential nutrients while increasing participation. This option would be offered at recess or nutrition break. If buses arrive too late or students are not hungry in the morning, a second breakfast allows them to eat a simple cold meal, such as a breakfast bar and milk. Expansion to remaining secondary and primary sites may be beneficial, especially at the schools with high FRMP eligible student populations and at secondary schools.

Implementing a universal breakfast in the classroom for schools with eligibility of 80% or above is another option for increasing participation. This option offers free breakfast to all students, regardless of eligibility. It is most feasible at the elementary level, where about eight district schools would qualify based on the 2016 CALPADS-certified data. This option is discussed to a greater degree in Provisional Meal Alternatives section of this report.

Monitoring operations and conducting data analysis is essential to improving efficiencies in any program. FCMAT was provided with eligibility/participation statistics by site from the Nutrition Services Department staff for May 2015 and 2016. Inconsistencies were identified between these statistical data and the data on the monthly School Nutrition Program (SNP) reimbursement claims. The management team should review data for accuracy, investigating any areas that do not appear reasonable or consistent with expectations or experience. Data analysis using reliable, consistent information in an easy-to-evaluate format can be invaluable in establishing and evaluating progress to achieve operational priorities.

The department leadership and supervisory staff should routinely analyze student participation, both monthly and annually. Supervisor IIIs track the participation at their assigned schools.

FCMAT was not provided with district-prepared analysis from each of these supervisors, but observed evidence that some analyses were performed. All sites should consistently collect these statistics monthly for evaluation by the director and her team to help identify changes in participation.

The nutrition services director has established a recognition program to encourage creativity among her staff and to increase student participation. The director reports that the program goal is for each site to increase participation by 10%. The overall participation goals as outlined in the districts Premier Cafe Award Program for breakfast is 30% for all grade levels and varying lunch participation goals; 60% for elementary, 50% for middle schools and 40% for high schools. Ideas are communicated via newsletters, and those with the greatest increases in participation are acknowledged with certificates of recognition and special aprons. Interviews with site staff indicate that the degree to which sites eagerly work to achieve this goal is inconsistent among sites.

Recommendations

The district should:

1. Provide a walkie-talkie or other alert system to individuals controlling lunch lines with visual limitations to reduce serving delays.
2. Consider increasing or establishing grab-and-go options and outside carts days with alternative schedules at secondary schools to increase participation that may otherwise be lost due to students perceived time limitations.
3. Reduce the use of proportion containers where possible.
4. To increase breakfast participation, consider offering a grab-and-go option and/or second-chance breakfast during recess or nutrition breaks, especially at schools with high FRPM eligible populations.
5. Consider implementing universal free breakfast in the classroom to elementary schools that are at a participation of 80% or above. This could be started as a pilot at select schools and expanded over time.
6. Establish a consistent method to analyze eligibility and student participation of individual school sites and monitor participation and efficiencies. Ensure the data analyzed is accurate and comparable to supporting data such as school nutrition program claim reimbursement submissions.

Point-of-Sale Systems

The order in which a serving line is set up is extremely important for speed and point-of-sale accountability. Because of space limitations and architectural design, some sites are obligated to set up serving lines in a set way. However, it is best to situate the point of sale at the end of the serving line when possible. It should also be in a location where the worker at the point of sale can observe the students coming through the line if feasible. This assists in supervision and monitoring each tray to ensure all necessary meal components are present.

The district uses a combination of methods to enable students to provide their identifications and give cashiers access to their accounts. In secondary schools and some elementary schools, they use a PIN pad with a six-digit code, the same one that students use for the library and other services. This code should remain consistent for the student throughout his/her enrollment in the district.

In some primary grades, students use cards with their student identification, which they pick up from a rack before entering the serving line. In other schools, the computer is set up to show photos by classroom; the cashier simply taps on the photo using a touch screen to access the account. The process of using cards typically works as long as the student has a card. If the card is lost (which is frequent) or damaged, another process has to be used. These cards are usually time-consuming for the staff to prepare and restock, as well as being rather expensive to make and replace.

Some sites visited by the team could adopt improvements in the established serving and point-of-sale setup to increase efficiency and effectiveness. At Del Paso Manor Elementary School, the point of sale was set up on the inside of the kitchen with a wall blocking the workers' view of students coming into the line. As a result, FCMAT observed some students move through the lines without getting counted for the meal that day because of the lack of visual ability. This problem could be simply corrected by moving the point of sale three feet into the hallway providing the worker with complete visibility. At Greer Elementary, students must pass in and out of the kitchen several times in an awkward manner to complete their meal service because of the physical layout of the building. Moving the entire serving line to the inside of the multipurpose room could increase effectiveness. Students could enter the multipurpose room, pick up a tray, select their items from a portable salad bar, receive their hot meal from a portable serving cart and present themselves to the point of sale. A heated cabinet could be placed close to the serving area to facilitate restocking of the hot food.

At a number of schools, FCMAT observed that the cashier was a substitute employee who did not readily recognize the students. Students did not necessarily enter the line by classroom, so the cashier had to switch screens back and forth. Students are required to say their name at the point of sale regardless of the system applied, but this can be difficult in a loud cafeteria, especially with a student who has a soft voice or speaks another language; this often results in transaction taking longer than necessary. Greater efficiencies may be achieved by organizing on-screen classroom photos by first name or utilizing PIN pads for all students.

Implementing PIN pads at elementary sites would require a transition period. While a card or name recognition system may be initiated in the beginning, students should quickly be encouraged to learn their PIN number and the key pad. The experience of most districts is that younger students are eager to show how quickly that they can learn their number. When asked to give their name, a child will always give his or her first name first.

During FCMATs site visits, one staff member reported that the option to change the screen from alphabetical by last name to first name can be accomplished only at the district level and would require a change districtwide. Simple changes, including changing screen preferences, can be made at the cashier level in other software systems. This would provide a substitute worker more flexibility and move the serving line much faster.

For many reasons including efficiency, the district should consider moving to a web-based nutrition software system as soon as possible. These systems have been available for a few years and provide the administrative personnel and computer technicians with a greater number of options. However, the district should ensure that the current PIN code numbering system will work districtwide.

Many schools use kiosks, serving carts and/or designated areas to serve a la carte options. Some of these lines were managed accepting only cash. While training may be required to ensure the staff member managing the point of sale properly recognizes reimbursable meals, the use of wireless point-of-sale system at these areas would allow them to add reimbursable options.

Recommendations

The district should:

1. Review the serving lines at each site to ensure that they are established in the most efficient manner, allowing students to move quickly with adequate oversight and point-of-sale accountability.
2. Consider implementing PIN pads at point-of-sale locations for all sites or organize on-screen classroom photos by first name to improve efficiencies at elementary sites.
3. Evaluate the benefits of upgrading to a web-based version of Etrition point-of-sale software for improved options.
4. Consider expanding wireless point of sale into all kiosks, serving carts and/or other designated areas serving a la carte options to allow reimbursable meals to be sold.

Marketing

For the last several years, most schools have noticed a decrease in student participation in the child nutrition program. This is partly because of negative press and the numerous legislative changes to the child nutrition meal programs. As a result, it has become increasingly important for districts to improve strategies for meal offerings and marketing. This is difficult because of the numerous TV ads depicting many food items as nutritious/high quality that schools cannot serve because they do not meet regulations. School food offerings are often mistakenly viewed as poor in quality even though the opposite is true. Both parents and students should be continuously educated about the value and quality of school meals. Communication with parents and students is essential to fulfill this need, and can be accomplished through school websites, information packets sent home and other creative marketing materials posted in school site kitchens and campus eating areas.

Many parents are becoming more accustomed to accessing information through the internet. The district website is an important tool for communicating the Nutrition Services Department's activities. The district's website has a section on nutrition services that provides information about any changes in regulations or meal offerings and includes a significant amount of nutritional information on the schools' new menus. It also gives examples of ways teachers and parents can help implement the new dietary guidelines. The site is an effective source of information; however, many parents and families do not take the time to review district websites. For this reason, the district should incorporate communications and/or informational items on nutrition services when any general school information is sent home. Communications could include items from the website or other communications depicting the value of school meals, including affordability and the often-improved nutritional value of school meals over those from home. Increasing visibility and participation at open house, back-to-school night and other school events also present opportunities to disseminate marketing information.

Other opportunities for improved/increased marketing are the school kitchen, cafeteria and or eating areas. FCMAT noted that some schools lacked signage clearly identifying the cafeteria. Many eating areas visited by FCMAT had no signage at all, not even to state the type of meals offered. For example, FCMAT observed four eating areas at Mira Loma High School, each with a different menu theme consistently offering the same meal options throughout the year.

However, no visible signage marketed the themes at any of these locations. Many school sites had large headers above the serving areas that could be used to hang banners marketing the offering theme(s), e.g., Asian Cuisine, The Pizza Place, and the Garden Salad Bar. Themes could also incorporate the school mascot, such as Cougar Garden Salad Bar, or other creative strategies that pique the interests of the students. Signage does not need to be permanent; removable banners work well especially if the line needs to change in the future. Another idea is to attach permanent frames to the wall that allow the information inside to be changed and updated as needed. When the cafeteria incorporates more of a restaurant theme, students will feel more comfortable and be more likely to come in and eat. Colorful posters can also market food offerings and encourage student participation. Schools can order complete sets of posters at <http://www.fns.usda.gov/team-nutrition/elementary-posters>.

Some mobile carts used to sell food in alternate locations on campus need updating and replacement. FCMAT observed signage that was used in prior years, but included outdated pricing and product lines. FCMAT was told by site staff that the signage was going to be repainted once funds became available. Colored-paper overlays could be used as a temporary option, improving communication to the customer about the items offered and their price.

Another marketing strategy is to invite a local chef to make a presentation involving an entrée or special vegetable recipe. The chef can host a 15-minute assembly immediately before lunch to prepare food that meets the requirements in front of the students. This food item can be served for lunch that day or week. A staff member or supervisor can perform the cooking demonstration if a chef is not available.

Another strategy to increase participation is to involve students in making decisions about the menu and serve meals that include student-approved items. Students can help develop part or all of one month's menu(s) although they will need to be instructed on the necessary components. A competitive environment can be a valuable marketing tool; incorporating student participation in the planning efforts and establishing a recognition program, such as placing the names of contributing students on the menu for that month may also encourage participation. Several school food service departments have had students formally taste-test potential new menu items such as heat-and-eat products and scratch-cooked recipes. Some schools throughout California have also offered samples as students passed through the lunch line and requested feedback. Many schools have found it effective to phase in new products over time and offer choices to students. Staff and students indicated that although the district has taste-tested items, they were never placed on the menu. This could be the result of a lack of communication and could be easily resolved by posting the results of taste tests on menus, cafeteria walls or the serving lines.

Recommendations

The district should:

1. Increase or improve marketing strategies promoting school meal offerings that make participation desirable.
2. Increase and/or improve parent and student communications on meal offerings that include points about the value of school meals.
3. Assess and improve the signage at each school site to ensure the building where the cafeteria is located is clearly identified. Customize the signage for the school by incorporating the school mascot or logo.

4. Assess the mobile cart equipment at the sites for possible replacement.
5. Ensure that serving locations clearly identify food items offered and/or the theme of the location; if possible state the items and prices on smaller signage.
6. Consider strategies to create enthusiasm and increase participation in the nutrition program, such as inviting a chef to perform a culinary demonstration, then include those items on menus.
7. Involve students in menu planning and implement a strategy for recognition.

Food Waste

Some parents are concerned that NSLP requirements cause too much food waste at the school site. The program requires a fruit/vegetable to be taken regardless of whether the child wants to eat it, and the requirements about portion size are very specific. In the case of fruits and vegetables, these requirements are difficult to convey to students because the portions do not appear the same depending on the type of fruit or vegetable chosen. The district has attempted to alleviate that problem by providing students with a sample tray on each serving line to give staff and students a visual example of proper serving for each item. However, because fruits and vegetables can be combined to equal the necessary portion size, they almost require individual attention. For example, to meet the requirement of a half-cup-size fruit and vegetable serving, students could take one-quarter of a cup of pineapple chunks and one-quarter of a cup of carrot sticks (about three).

During FCMAT observations, nonfood services school-site staff members who supervise students at mealtime also assisted with serving, but did not appear to understand the offer vs. serve regulations. School site leads and supervisors should routinely observe all nonnutrition services staff and ensure they follow protocol for offer vs. serve and that they are included in ongoing training.

At several sites, many students took very large portions of nearly every item offered in the salad bars. Staff strongly encouraged and at times forced students to take everything, which resulted in considerable waste. Under the offer vs. serve system used by the district, students are only required to be offered set portions of fruits and vegetables, grains and proteins to make up a complete meal.

At one elementary site, the serving sizes and content of menu offerings more than met the requirements. Students were offered and encouraged to take both a two-ounce portion of cereal and a two-ounce muffin. Many students were unable to finish the full two-grain equivalent serving of cereal. K-8 schools are required to offer eight- to 10-grain equivalents for a breakfast meal, but a child may choose at least one to two of the same or different grain items. The district could offer a smaller one-ounce size cereal offering, reducing waste and cost, since the larger size cereal can be substantially more expensive. While more can be offered or selected by the student, it is not necessary to insist on greater quantities, a practice that slows the lines, decreasing efficiencies. Routine training and review of the requirements with staff helps children not be encouraged to take more than required.

The improper setup for offer vs. serve also increases waste. During one site visit, FCMAT observed breaded chicken served as one of the entrée choices. The students were pre-dished seven chicken nuggets and one dinner roll, but the serving size of the chicken nuggets alone would have counted as two meats and one grain. The dinner roll could have been offered to the students

in a self-service bowl next to the nuggets, but the students did not need to take them. A considerable number of students discarded the dinner roll. The excess serving increases cost and waste.

The warehouse supervisor works closely with the menu planners to carefully control the purchase and delivery of fresh items to school sites on the days preceding a holiday or a lengthy vacation to reduce waste. However, it is inevitable for food purchased in advance to become waste when menus change to increase participation, or the population's dietary preferences lead to modifications such as the reduction or elimination of pork options. These excess items are used for a local camp or donated to local food banks or shelters periodically and at the end of the year; this is consistent with the industry standard.

The food services program assigns "manager's choice" days at the end of the year to allow each individual kitchen, in coordination with the warehouse, to choose menu items that use the remaining inventory. In most cases, the quantities of an individual item are sufficient for one or two schools, but not all of them. Increasing the number of manager's choice days at the end and throughout the school year, especially days near holiday weeks when the meal counts tend to be low, may help the district decrease waste even more. Products remaining from previous weeks may otherwise go unused and could be used at the elementary schools as a second-choice option if offered during the same week. While this requires more coordination by staff, it could further reduce waste. Staff should closely monitor perishables such as produce and milk before holidays and vacations. To further reduce waste, small amounts of unused product can also be sent to the high schools and offered as specials rather than including them on the printed menu. The regulations allow for substitutions to planned items on the menu cycle.

Recommendations

The district should:

1. Routinely observe all nonnutrition services staff to ensure they are following the protocol for offer verses serve.
2. Review menus and portion offerings to ensure that offer verses serve is implemented correctly.
3. Modify serving sizes to meet but not exceed the requirements when multiple choices are offered and ensure serving staff do not require students to take everything.
4. Continue the communication between warehouse staff and menu planning staff to incorporate excess product inventories into menus preceding holidays and at year-end.
5. Routinely train and review the portion size requirements with site staff to decrease waste at the site. Include in these trainings the school site staff members who assist with serving or supervise during mealtime.
6. Ensure the warehouse staff and staff responsible for menu planning continue to make collaborative efforts to control the purchase and delivery of fresh items during holiday and vacation.

7. Consider increasing the number of “manager’s choice” days throughout the year to use up small case amounts of excess product.
8. Consider sending small unused product inventories to high schools for use as daily specials.

Subsidized Meal Programs

Free and Reduced Price Meal (FRMP) Application Process

Participation in the National School Lunch Program and/or School Breakfast Program requires each student's eligibility to be determined annually through the submission of a free and reduced priced meal application. At the start of each new school year, student eligibility as of the end of the previous school year is automatically extended into the first 30 operating days of the next school year. After processing all applications on hand, districts spend considerable time and energy notifying the parents of students whose application has not been received. If a student application is not received at the end of the 30-day grace period, the student eligibility automatically converts to "paid" status; and the student will be charged the full meal price beginning on that date.

Like most districts, San Juan Unified makes repeated attempts to notify the parents of the need to submit an application for their student(s) well in advance of the end of the grace period. The district takes the following steps:

1. The eligibility expiration date and application deadline is discussed in the Nutrition Services back-to-school meeting.
2. Posters and flyers are created in English and Spanish and distributed to sites for posting in cafeterias and school offices.
3. Three weeks prior to expiration, a letter is mailed to households whose applications have not been received and eligibility is soon to expire. A copy of the charge policy and a new application is enclosed.
4. Two weeks before expiration, a second letter is mailed to households whose applications have not been received and eligibility is soon to expire. A copy of the charge policy and a new application is again enclosed.
5. Principals and school secretaries are notified of the eligibility expiration date and are provided a copy of the letter sent to parents; specific students and households are not identified.
6. A message about expiring applications is shared through Leadership Reflections, Behind the Scenes, and SJ Scene (district newsletters).
7. A second email is sent to Nutrition Services site workers to prepare them for the day after the eligibility grace period expires. A copy of this email is also forwarded to the school site principal and secretaries.
8. Two weeks before expiration, all families receive phone calls and emails from Nutrition Services through the School Messenger system. Communications are sent in five languages, English, Spanish, Russian, Farsi and Arabic.
9. Nutrition Services also requests that principals and secretaries send automated phone calls and emails to all of their students during the two-week window prior to eligibility expiration.

Before the end of the eligibility grace period, the Nutrition Services Department works proactively with parents by arranging to have Chromebooks available to complete applications at back-to-school nights and when schedules are picked up so that online applications can be submitted immediately.

A common concern among school districts is that a child will be refused a meal or given an alternate meal on the day of the deadline. Principals indicated they want to receive a list of students whose eligibility expires so they can be proactive in contacting parents. However, the USDA guidelines strictly prohibit the release of student information pertaining to Free and Reduced Meal Program eligibility status.

The CDE has made it clear that EC Section 49558 prohibits local educational agencies from releasing a list of students who have not submitted their meal applications so districts can send reminders. The following excerpt is from a CDE Management Bulletin: Guidance on Sharing of Meal Applications- Q&A:

EC Section 49558 does not allow a school district, charter school, or county office of education (COE) to release a list of students who have not submitted their meal applications to the district superintendent for the purpose of reminding students to submit meal applications. The submission of meal applications is not mandatory. Such sharing may overtly identify those who qualify for and participate in the NSLP.

EC Section 49558 allows only for sharing the list with the district superintendent for the purposes of determining funding allocations under the local control funding formula (LCFF) and for assessing the accountability of that funding.

More guidance may be accessed through the following links:

- Does EC Section 49558 allow districts to provide a list of students who have not turned in their meal application and are not on the DC list to the school district or superintendent to remind the students to submit a meal application?
- <http://www.cde.ca.gov/ls/nu/sn/mbsnp122015.asp>

Regardless of efforts to communicate the importance of submitting applications each year, some parents simply do not respond until the child is refused a meal and complains. School site leaders and district nutrition services staff should continue working collaboratively to ensure established procedures for parent notifications are followed. Extra time should be allowed so that the site supervisor or lead can make phone calls to parents in the morning. A daily report should be sent from Nutrition to the site leader beginning at least four days in advance. Without overt identification, the site leader can say to the child, “you will need to bring in money or an application by tomorrow.” It is also common to send the child to the office or site leaders’ office the day before the drop date to call their parent(s), emphasizing the importance of the matter. If a child is still not authorized by the time lunch is served and parents cannot be directly reached, an alternate meal must be provided.

All communications to parents should clearly specify the consequences of not receiving the application, including the statement that the child will be responsible for the full price of the meal on that day regardless of previous status.

Some districts acquire donations from parents or other local sources specifically to pay for the meals for children whose parents have still not complied as of this day. However, this practice only prolongs the problem if the parent does not address the matter.

Recommendations

The district should:

1. Continue to work collaboratively to ensure established procedures for parent notifications are consistently followed districtwide.
2. Ask students discreetly to go to the school or site leader's office to call their parents directly when eligibility deadlines approach.
3. Provide daily reports from Etrition to eligible site leaders at least four days in advance of the eligibility deadline so that they can work directly with the child to ensure they know they will not receive a regular meal once eligibility expires.
4. Ensure all letters and notifications clearly state that the child will not be served a regular meal on the day eligibility expires and that full price charges will begin to be incurred.
5. Ensure that only authorized staff assist with parent notifications. This is clearly described in USDA guidelines and may be subject to sanctions if not followed

Provisional Meal Alternatives

The district uses the standard method of claiming federal and state reimbursements for meals served to students. This method reimburses the district based on each participating student meal program eligibility, paid, reduced price or free. For students qualifying for free lunch, the district can claim the highest reimbursement of \$3.24. For those qualifying for reduced priced meals, the reimbursement is \$2.84 and the student is required to pay 38 cents. The amount of reimbursement typically changes each year. For districts like San Juan Unified, that necessitated changes as a result of the new meal guidelines; an additional six cents per meal is included in their reimbursement. The district receives reimbursement by tracking daily counts of meals served to students by eligibility category. This system requires precise tracking at the point of sale for each meal period.

Every year, a considerable amount of paperwork must be collected for individual participating students in each household for the annual determination of the students' eligibility to comply with the USDA standards.

In an effort to reduce paperwork at the local level, Congress in the 1980s incorporated into Section 11(a)(1) of the National School Lunch Act three alternative provisions to the normal requirements for annual determinations of eligibility for free and reduced price meals and daily meal counts by type (free, reduced price and paid meals) at the point of service. Of these three alternative claiming provisions, the most commonly used by schools districts is the second, called Provision 2.

According to data certified in CALPADS, the number of students qualifying for free meals has increased. The district should evaluate the potential and benefits of other claiming options. The Provision 2 claiming method reduces the annual application burden considerably and simplifies meal counting and claiming procedures. Qualifying schools within a district establish baseline claim percentages in a given base year and serve all meals at no charge for four years. Schools must serve meals to all participating children at no charge during the base year and the three

subsequent years, including those identified with reduced price and paid meal eligibility under the standard eligibility provisions.

During the first or base year, the school makes eligibility determinations for each student's eligibility qualification, free, reduced price or paid meals. Meal counts are then taken by type for the entire year. During the next three years, reimbursement is determined by applying the base year participation percentages of free, reduced price and paid meals served during the base year to the total meal count for the claiming month for the school. The school makes no new eligibility determinations and counts only the total number of reimbursable meals served each day instead of counting meals by type. Reimbursement is then determined by applying the percentages for free, reduced price and paid meals established in the base year.

This claiming method would not work for the entire district because it has an average districtwide student population of 48 percent qualifying for free or reduced price meals. However, this provision allows a district to make determinations based on individual schools within the district. The benefits of this alternative method are typically achieved for school sites with eligibility rates of 70 percent or higher. Based on information provided to FCMAT by the Nutrition Service Department, including the September 2016 claim for reimbursement numbers, several schools appear to qualify for this program. The district data certified in fall 2016 indicates that 22 schools have a free and reduced price eligibility rate that exceeds 70%, and several schools were close.

Another new claiming method that might be more beneficial to apply at other district sites is called the Community Eligibility Provision (CEP). The CEP provision was established as a result of the Healthy, Hunger-Free Kids Act of 2010 and allows schools and local educational agencies located in low-income areas to provide free breakfast and lunch to all students. CEP was phased in over a three-year period and became available nationwide July 1, 2014. CEP completely eliminates the traditional paper eligibility applications. Instead, schools are reimbursed through a formula based on the number of "identified students" and those certified without application, also referred to as "direct certification," for free school meals because they are in foster care, Head Start, are homeless, migrant or living in households that receive Supplemental Nutrition Assistance Program (SNAP)/Food Stamps, Temporary Assistance for Needy Families (TANF) cash assistance or the Food Distribution on Indian Reservation benefits. Because this system eliminates the use of applications, it changes the appearance of the way free and reduced price data appears. Because it considers only identified students qualifying through direct certification for free meals and not those qualifying by income, it creates the appearance that overall rates have decreased even though they have not.

Schools and LEAs with a minimum identified student percentage that is greater than or equal to 40 percent in the prior school year may participate in the program. When using this system, the state, applies a multiplier of 1.6 to the number of students qualifying through community eligibility for free meals and uses that figure to calculate the reimbursement. With this new provision, some district schools will receive the highest reimbursement rate for 100% of meals served even though under the traditional reimbursement program, they would receive a lower reimbursement rate for meals served to students who qualify for reduced price and paid reimbursement category. While the intent is to increase participation levels by feeding all students, in some circumstances, this reimbursement program could actually increase revenue while feeding the same number of students.

FCMAT requested from the district a list of the *total* number of students at each site that qualified through direct certification for the meal program as of April 2016. This is the same time-frame used for qualifying or applying for CEP. The district provided a list of more than 10,000

individual student names and their eligibility. FCMAT requested the total number of students by site several times, not names because of the legal issues involved. Individual student information should not be sent in this manner. Section 9(b)(6) of the NSLA (42 U.S.C. 1758(b)(6)) outlines the restrictions on the disclosure and use of information obtained from an application for free and reduced price meals, as well as the criminal penalties for improper release of information. While the statutory provision references applications for school meals, the disclosure requirements also apply to information obtained through the direct certification process. The requirements may be found in a USDA memo dated: December 7, 2015. With the MEMO CODE: SP 16-2016; CACFP 06-2016; SFSP 10-2016 and the subject heading of: Disclosure Requirements for the Child Nutrition Programs.

On May 1, 2016, the states were required to publish a list of schools and school districts that were eligible or nearly eligible for community eligibility in school year 2016–2017. The Food Research & Action Center, in partnership with the U.S. Department of Agriculture, compiled these lists and made them available in the searchable database. Because of the delay in response by district personnel to the request for total student numbers by site, FCMAT used the data from this site for consideration. The website is <http://frac.org/may-2016-community-eligibility-provision-searchable-database>.

The review of data from this site identified 13 district schools that qualified for the CEP program and nine schools that were so close to qualifying, further analysis was performed. For example, according to the database 62% of the student population at Encina Preparatory High School qualifies for the CEP program. This percentage is multiplied by 1.6, resulting in a free meal priced reimbursement rate of 99.2%. This means that all students at this site eat without charge with the district receiving free meal priced reimbursement for 99.2% of those meals served and reduced price meal reimbursement for the remaining .8%.

This program has many advantages. Utilization of point of sale to determine if a student qualifies to receive a free or reduced price meal or has sufficient money in their account become unnecessary. Many districts who participate at the elementary level do not even use a computerized system at these schools; a simple meal count is all that is necessary. Labor hours contributing to processing FRMP applications, performing verifications and/or daily tracking student's participation by eligibility are alleviated. Increased student participation is also common. The need for student accounts is eliminated, as is the denial of a meal when applications are not received by annual cut-off dates.

Some districts have experienced success with breakfast in the classrooms by following this program. This program is generally applied only in elementary schools, not at high or middle schools because the complexity of meal offerings in those grade levels. Dyer-Kelly serves approximately 200 breakfasts each day, but under this program all 440 students would be offered this meal without charge. Nationwide tests have shown that students who eat breakfast perform better in school and test results improve. This could increase revenue substantially although some increased costs will also be incurred.

Based on FCMAT's review of the data, if meal counts remained unchanged, the district could experience an increase in revenue under the CEP program for four of the schools that would qualify for meal reimbursement at the highest level for all meals served.

In conjunction with the analysis of moving to an alternative reimbursement program, the district must consider the effects on student data collection and reporting used for the Local Control Funding Formula (LCFF). Schools on the CEP may establish a base year for LCFF purposes.

Schools using this option only to establish a new LCFF base year must collect income data for all eligible students at least once every four years and collect income data for every newly enrolled student in the intervening years. More information on a districts verification responsibilities when electing an alternative meal reimbursement program and as it relates to LCFF is accessible of the California Department of Education web site at: <http://www.cde.ca.gov/fg/aa/lc/lcfffaq.asp#FREE> .

Recommendations

The district should:

1. Evaluate other reimbursement claiming options, including Provision 2 and CEP, to determine if alternative options result in a more favorable reimbursement for the district.
2. Consider instituting a breakfast in the classroom if the district qualifies for and moves to an alternative reimbursement program structure.
3. Ensure all staff are trained and familiar with the limitations on releasing student eligibility data. Management should carefully oversee responses to all requests of this nature to ensure student data is properly safeguarded in compliance with law.
4. Before moving in the direction of provision meal claiming, review and understand the requirements for student eligibility verification as it relates to the LCFF, available on the CDE website.

Other Operational Components

Purchasing, Warehousing, and Inventory

During FCMATs fieldwork, the team visited the district primary and nutrition services warehouse facilities. The Nutrition Services warehouse appeared to be very organized and no comments regarding inefficiencies or wrong items being delivered were expressed during FCMAT interviews. The warehouse staff have a well-structured routine for managing their workload. Orders are checked and double checked before shipment, and any items needed by sites at the last minute are assigned to a “hot shot” driver. The entire process of menu writing, ordering and delivery appear to be collaborative. While the team is organized in its approach, the warehouse workflow would greatly improve if separate areas for product delivery by vendors and trucks were utilized for site deliveries.

At elementary school sites, staff remarked that it is difficult to meet the requirement of placing orders three weeks in advance; they believe a shortened timeframe would allow them to more accurately predict their needs. The warehouse supervisor spoke about the age of the purchasing software used (Horizon’s VBoss) and the need to update to the newest version.

Greater efficiencies may be experienced if the menu were changed to a more traditional cycle, with the same items offered on approximately the same days of the month. All involved could better anticipate needs. However; during interviews, the warehouse supervisor indicated that if the turnaround time was less than three weeks, the team would be unable to double-check orders before delivery.

Recommendation

The district should:

1. Consider moving to a standardized cycle menu at all sites, which helps the warehouse keep enough product on hand without relying solely on site orders.

Bidding

Sending formal bids or requests for proposals (RFPs) generally results in lower and more consistent prices. The Nutrition Services Department uses bids for pizza, produce, dairy and bread. In addition, an agreement is established through the SuperCoop (a food cooperative comprised of many school districts throughout California) that allows districts to piggyback prices from Santa Clarita School District for USDA commodity distribution and for products that have been processed from USDA commodities.

In the future, the district could benefit from assessing the use of noncommodity products and soliciting price quotes from other distributors. A simple comparison of the prices of the top 40 most expensive items, or the items on which most money is spent, to similar products at other large districts would give a better indication of whether the district’s current vendors could offer better prices. Current vendors can provide the district with volume reports if this is not available in the district’s inventory system. The district would have to decide whether to use a prime vendor for most products or seek-line item bids, which may be won by several vendors and involves more coordination.

Recommendations

The district should:

1. Consider expanding bidding and/or RFPs to include noncommodity grocery items and nonfood supplies.
2. Compare current noncommodity pricing to other districts.

Food Safety Program

The Child Nutrition and WIC Reauthorization Act of 2004 required school food authorities to implement a food safety program based on hazard analysis and critical control points (HACCP) principles at each preparation and service facility in the district participating in the National School Lunch or School Breakfast Program. HACCP is a systematic approach to construct a food safety program and reduce the risk of food-borne hazards. It accomplishes this by focusing on each step of the food preparation process from receiving to service. The overall program must include a written plan for each individual school and be based on HACCP principles. To comply with the Child Nutrition Act of 2004 the department indicated it had developed a general written HACCP plan that meets the federal requirements and includes standard operating procedures for each site. Each kitchen site has a computer that can log into the district site where staff can look up all the procedures for that day's production. The system was made available to food service staff online to decrease the amount of paperwork held at each site.

An essential part of HACCP and a good food safety program is staff training. Staff need to receive training at least once each year and have ongoing training plans throughout the year. The district conducts an orientation with all newly hired food service staff to review basic food safety, which is followed by further on-site training and also holds two mandatory trainings each year that include a review food safety procedures.

FCMATs site visits and staff interviews indicated that the warehouse staff do not participate in the food safety training. Although warehouse staff generally do not prepare food, it is important that they have a good basic understanding of food safety, especially in the areas of food storage and time/temperature needs. One of the most important parts of a HACCP program is monitoring the system at the site and management levels. All sites and locations must be visited by management and evaluated regarding how well they maintain HACCP logs and regulations.

The last two state/federal administrative reviews of the Nutrition Services Department resulted in no major findings, and a few smaller infractions that have since been resolved.

FCMAT noticed at two of the sites visited that some staff do not have a good understanding of the California Health and Safety Code (CHSC). Some staff members in food preparation areas had long fingernails (possibly artificial), and some had chipped nail polish. These staff members did not wear gloves. Other staff members lacked the proper hair restraint. Both of these violate the Health and Safety Code, which states in Section 113973:

- (a) Single-use gloves shall be worn when contacting food and food-contact surfaces if the employee has any cuts, sores, rashes, artificial nails, nail polish, rings (other than a plain ring, such as a wedding band), un-cleanable orthopedic support devices, or fingernails that are not clean, smooth, or neatly trimmed.

Section 113969 states as follows:

- (a) Except as specified in subdivision (b), all food employees preparing, serving, or handling food or utensils shall wear hair restraints such as hats, hair coverings, or nets which are designed and worn to effectively keep their hair from contacting non-pre-packaged food, clean equipment, utensils, linens, and unwrapped single-use articles.

Retraining in these areas is necessary and should be ongoing and routine.

Some of the staff in production areas wore short pants and/or shoes that did not seem to have nonskid soles. Although these are not necessarily food safety issues, they are both health safety issues. Cal/OSHA regulations are designed to keep employees safe in the workplace. The agency has developed the Cal/OSHA Guide to Restaurant Safety that includes recommendations that all staff wear nonskid shoes and cooking staff wear long pants. These are both interpretations of the law, but Cal/OSHA guidance recommends that they become part of a kitchen's internal rules.

Recommendations

The district should:

1. Continue twice a year training on HACCP and implement procedures for management to monitor through site visitations staff review and implementation of online standard operating procedures.
2. Ensure that all food service warehouse staff receive basic training on food safety and its importance as it applies to their work areas.
3. Routinely train all staff on the CHSC violation issues stated above and include them as part of management site monitoring visits.
4. Review and update existing department dress code policy for the Nutrition Services Department to include nonskid shoes and long pants in the kitchen work areas. If the district does not have a policy regarding dress code requirements that incorporates consideration for health safety matters, one should be established and implemented.

Federal and State Compliance - 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 and in student stores, a la carte items sold by the Nutrition Services Department, and items sold at fundraisers. A few changes to the regulations were made at the federal level in 2016, but they do not affect California because the state has stricter rules than the USDA.

More detailed information can be found on the CDE website at the following link: <http://www.cde.ca.gov/ls/nu/he/compfoods.asp>

During FCMAT's site visits, the team observed activities that raised concern regarding competitive sales. The team observed the sale of items by food services that are outside of the federal meal programs but appeared to meet the nutritional guidelines required. Most a la carte items sold by food services are at secondary schools.

Throughout interviews with district and site staff, FCMAT received reports of sites often not paying close attention to food sales regulations, and sales not meeting standards. During FCMAT's site visit at Mesa Verde High School, the team observed a "mini mall" with a posted menu of food type items for sale. Further inquiry indicated this was a business academy class that teaches students how to operate food service type operations. The store conducts operations including food sales on campus during the school day; a clear violation of competitive food sale regulations.

The site and district administration should review the food sale regulations and determine whether menu items and procedures can be modified to comply with regulations. Otherwise, operations may need to be discontinued.

Food service staff reported frequent school site competitive food sales during the day that do not meet regulations such as cupcake and candy sales. These concerns were validated through observations made by FCMAT during site visits; schools had signs for cupcake sales by student clubs during lunch, and students carried boxes of candy bars with sale signs on them. Neither candy nor cupcakes are allowed to be sold during the school day. The district is responsible for ensuring that food sales by individual clubs and/or instructional programs are carefully controlled and all sites are familiar with and strictly follow all established policies and procedures. Secondary-school regulations allow one entity (e.g., a student store) to sell food daily, but all other clubs and organizations are allowed to have only four sales each year, and all clubs districtwide must sell on the same four days.

The food service director indicated she has informed sites of the regulations including presentations at district administration meetings to increase awareness of these requirements. Additionally, an online system to request fundraising activities that include food type items was recently implemented requiring completion of an application form. This form is to be submitted and reviewed and approved or denied by Child Nutrition before the activity occurs to ensure sales meet regulations. However; sites do not appear to consistently follow this process.

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

Recommendations

The district should:

1. Evaluate the mini mall operation on the Mesa Verde High School campus and institute modifications that ensure compliance with all competitive food regulations. On-site food preparation is prohibited; all foods and beverages sold must meet the a la carte nutrition guidelines.

2. Review competitive food sales regulations with all sites. Site administration should be held accountable for this on their campuses. District administration should closely monitor sites to ensure compliance with established procedures.
3. Assign the Nutrition Services Department to regularly provide guidance to sites on competitive foods regulations and oversee all sales of food items districtwide.
4. Hold school site administrators accountable for learning and adhering to the district's established procedures for student or program sales and/or fund-raising events that include food sales.

Training and Professional Development

New regulations from the Child Nutrition Act on staff competency and regular training became effective July 1, 2015. Child nutrition directors, managers and staff are now mandated to receive annual training focused on professional standards and annual training requirements. The requirements vary with the position, must be documented and will be evaluated during administrative reviews conducted by the CDE.

Information about this mandate and training resources can be found at the following website: <http://professionalstandards.nal.usda.gov/>

Establishing an adequate employee-training program for Nutrition Services staff can be difficult in a district as large as San Juan Unified because regulations constantly change. District food service management staff is aware of the importance of training, but it often gets deferred because of their many responsibilities.

Management staff indicated they are in the process of creating an online training program. The district has identified two supervisors to oversee training districtwide, although all site supervisors are responsible for ongoing training at their sites. The formal training program consists of a beginning-of-the-year meeting for the entire Nutrition Services Department, one meeting in November for elementary staff and one meeting in January for secondary staff. While the minimum number of required training hours may be met through training provided during these meetings alone, this may not be sufficient for staff members to obtain a thorough program understanding. The best practice is to have frequent trainings including on-site, hands-on trainings.

The current training practices may be insufficient to ensure that staff learn the essentials. Meetings with staff, especially leads, should be held more frequently. They can be short, on-site meetings, but should be planned and scheduled several times throughout the year. Spontaneous trainings should also be scheduled as issues arise that indicate a weakness exists or circumstances that point to a safety and/or health concern. Observations and hands-on trainings provide an opportunity to assess staff skills and identify key areas where additional training would be beneficial.

During FCMATs site visits, the team observed many indications that site staff is not clear on program requirements, including those related to what constitutes a complete meal, portion control and offer vs. serve requirements. Their well-intentioned "sample plate" discussed in previous sections of this report gave the impression that students should overfill their plates. FCMAT also observed many staff members telling students to take more items than necessary

to qualify for a complete meals while other students left the point of sale with incomplete meals, e.g. without a fruit or vegetable. FCMAT also observed on at least one site visit students moving past the point of sale without checking in as the staff person was focused on other matters.

During interviews with site and department staff FCMAT identified a lack of communication and the perception of non-management staff of being disconnected from the management staff. Some site staff reported that they do not have frequent interactions with their immediate supervisors, and many said they rarely saw top management visit their sites. Other staff indicated they receive no response to emails and/or delayed responses to requests for approval. One staff member reported that an event requiring approval had already occurred by the time response was provided. The perception of being disconnected can happen even when interactions such as meetings and trainings are frequent. Management staff should ensure they frequently interact with staff at all levels and develop an environment of inclusion.

Interviews with warehouse staff indicated that they receive regular trainings in risk management, including procedures for lifting and use of forklifts. However, staff reported that they do not receive food safety/safe food handling training. Because the food service warehouse staff routinely handle most food items received by the department, including the receipt from vendors to the delivery to school sites and departments, each should annually receive safe food handling training.

Recommendations

The district should:

1. Reevaluate its current training program and find ways to hold more frequent meetings, including on-site, hands-on.
2. Ensure a standardized training for all staff focused on full meal equivalents and offer vs. serve requirements.
3. Ensure department and site management make it a priority to regularly communicate and interact with staff at all levels. Response to requests for authorization should be timely.
4. Provide food services warehouse staff with annual food safety training.

Facilities

The maintenance and working condition of kitchen facilities and equipment is essential to a district's food safety program based on HACCP as well as for the safety of staff who work there. For example, uneven floors or leaking pipes can create tripping and slipping hazards. The proper wall coverings can help reduce physical and biological contamination to food being prepared, and having the proper equipment can speed production. Several types of new combination or infrared ovens can decrease cooking time and speed production. Some of these new technologies can be more expensive, but should be considered as replacements when older units become irreparable.

FCMAT visited 21 school sites and assessed the physical size and condition of each location, finding all of them in adequate condition. The cleanliness of each site visit was satisfactory. Food services staff seemed to take pride in their kitchens and were interested in keeping them in operational order.

Some sites had new equipment and some kitchens had been remodeled. In the remodeled kitchens, the walls were covered in fiber reinforced plastic sheeting. This product is easily cleaned, durable and very low maintenance. It can be sprayed with a high pressure hose or simply wiped with a washrag and will not chip or flake off like a painted surface. Some of the others sites visited by the team showed signs of wear and while adequate, were in need of remodeling. For example, equipment at the Winston Churchill Middle School is old, but still functions adequately. The walls at this site lacked the upgraded sheeting, were older and painted, with had chipping and need to be repainted. The vinyl flooring in the kitchen had tears in it and poor seams with built-up dirt around old piping that had built up dirt in them. Old tape and gum were stuck to the exhaust hood. These could be identified as areas of concern during local health department inspections.

The kitchens visited were mostly adequate for the volume of meals produced. As a general rule, one square foot of kitchen space is needed for each full meal produced. For example, Carriage Drive Elementary has around 400 square feet of kitchen and storage space and produces approximately 330 lunches per day. This facility is adequate for its level of production, but would likely be insufficient to handle a significant increase in meal preparation resulting from increased enrollment or participation.

Other schools, like Del Paso Manor Elementary, has approximately 600 square feet of kitchen and storage area. This site produces 265 lunches per day and has sufficient capacity to more than double its current production level. Mesa Verde High School; however, has approximately 400 square feet of production space and serves more than 480 lunches per day, operating at the peak of capacity. At this particular site, FCMAT observed a room with a roll-up window close to the cafeteria. Staff indicated the room is designated solely for activities of the Parent Teacher Association, but if not used during meal times, it could afford some much-needed space to food services.

Centralized and Decentralized Kitchen Options

The district's food production is sited-based, with each site operating and serving from its kitchen for its own students. Most food ordered from vendors is delivered to, stored at and shipped to school sites from a centralized food service warehouse. The district has in the past, when necessary, used individual sites for food production on behalf of several other school sites. Staff indicated during FCMAT interviews that the Mira Loma High School kitchen once produced food and transported it to three other sites. This site is well equipped and has sufficient space to

produce meals for a limited number of schools if the district determines a centralized approach might be beneficial. Most sites visited by FCMAT were found to have only enough production space and equipment to meet the needs of that campus and were not suitable as preparation sites for other schools.

Many districts operate site-based kitchens similar to San Juan Unified, but under the right circumstances, centralizing operations may be a more efficient approach. With a centralized kitchen approach, one large central kitchen is typically utilized to produce meals for all school sites in a district. Meals are prepared each morning and delivered to each school site for heating and serving. A variation of this concept is operating several smaller hub kitchens in strategic locations to produce meals for surrounding schools. These are usually large preexisting kitchens or district buildings that have been given a different purpose. Greater capacity for scratch cooking and use of local produce are often byproducts of a large centralized kitchen.

Initial capital outlay for building and/or kitchen construction or improvements and equipment should be expected and thoroughly assessed before moving to a centralized kitchen approach. Staff retraining and acclimation will initially affect operations. These expenses can be offset over time through cost savings that often result from operational efficiencies. While some districts have experienced increases in meal participation, and therefore food service revenues because of improved quality and variety of meals, others have complained that the central kitchen concept decreases menu creativity and increases the appearance of a fast food operation.

Staffing requirements are expected to decrease under a centralized or hub kitchen approach, increasing a district's MLPH ratio. Most elementary schools serving lunch and breakfast should need no more than two staff members totaling 8.5 labor hours; some districts operate elementary schools with only one staff member ranging from 3.75 to six hours. It is important to strategically evaluate staffing models. It may be efficient to assign some staff to start their day at the central kitchen then switch to a school site during meal periods for final preparation and/or to assist in serving.

Districts also need to consider their ability to deliver meals from a central point. One immediate advantage for San Juan Unified is that it already operates a centralized food service warehouse that delivers food to all sites at least once a day. Because some sites may need two deliveries each day, additional delivery personnel and a van may be necessary, but the basic delivery patterns exist.

Another factor is the type of meals to be served at the school sites. The district serves most meals in bulk, which means several food items such as mashed potatoes or taco meat are dished from large pans directly onto the student's plate. Another way of preparing meals is to predish them into individual serving trays at the central kitchen. Trays contain complete hot meals that could include meat, vegetables and bread. With this system, meals are standardized in portion size and sealed to avoid physical contamination during transport. Consideration of the type of meal service a district will implement is an essential component of a district's analysis and should take place before developing plans for a kitchen because each system will require different equipment.

The location of a centralized kitchen is a critical component of a district's feasibility assessment. Ideal locations that have the characteristics ideal for centralized kitchen operations include the following:

- Industrial areas where large-scale trucking routes are the norm.
- Closeness to high schools offering practical vocational classes

- A school warehouse structure that is obsolete to the district or is not committed to essential operations.

Large commercial buildings, such as a vacated grocery store often work well because they are established to accommodate commercial deliveries; many times the remodel is not very extensive.

The size of any facility considered will ultimately depend on its use. Consideration should be given to the need for classroom space, conference rooms and/or a dining room. The district should also determine whether all food service staff, including administration will be located in the building. As a rule for estimating space needs, a minimal fresh-food production kitchen serving 200 to 1,000 meals would require 1,000 square feet of space. For production in excess of 1,000 meals, it is one square foot for each meal served (for example, 4,000 lunches requires a 4,000-square-foot kitchen).

The costs of a central kitchen can vary greatly depending on the location and whether it is new construction or a remodeled building. The district should decide if the kitchen's purpose is to save the most money and use bulk premade meals or to prepare more meals from scratch and send them in bulk pans ready to be dished. Meals prepared from scratch require more industrial equipment like cook chill equipment, proofing cabinets and blast chilling cabinets. They also require more equipment to accommodate transport of meals to the school sites.

During interviews, staff indicated that facilities including or adjacent to the current food service warehouse were suggested as a possible location for the central kitchen. The advantages of this site are that the district owns the land, it is centrally located, and it is already accustomed to deliveries of large semi trucks. A disadvantage is that depending on the size and scope of the project, significant expenses may be required for construction.

FCMAT toured several alternative sites that the district could consider for hub kitchens including Arden Middle School, Creekside (vacant), Casa Roble High School, Sunrise (Vacant) and Fair Oaks (vacant). Arden and Casa Roble have the potential to produce extra meals, but some remodeling and organization would be required to provide meals for some schools close to them. However, these sites could not handle extremely high production volume increases, and converting them into hub kitchens would necessitate smaller vans to shuttle the meals to the other satellite sites.

The other three vacant schools FCMAT toured could be remodeled to handle large-scale production needs, but each would likely need considerable and expensive asbestos abatement according to district personnel. Each of these sites has a multipurpose room that would also need to be incorporated in the remodeling to function as central or hub kitchens. Even with extensive remodeling, each of these sites would only produce an estimated 4,000 to 6,000 meals per day depending on the type of meals prepared. The Sunrise location also has disadvantages since its entrance does not permit cross-traffic. Another problem is that most surface streets in the district are small and congested, making it difficult to perform large semi-truck deliveries.

The federal and state rules and regulations provide guidance for determining funding options for centralized food service projects. Federal Regulation, 7 CFR Part 210.14 Resource Management, specifies the following:

School food authorities shall maintain a nonprofit school food service. Revenues received by the nonprofit school food service are to be used only for the operation or improvement of such food service, except that such revenues shall not be used to purchase land or buildings, unless otherwise approved by FNS, or to construct buildings.

Therefore, the cost for building the facility usually is covered through the issuance of bonds and/or modernization funding.

Equipment is often purchased using school food-service funds. When planning a new facility, the school food-service director should contact the CDE Child Nutrition Department and confer regarding funding options. Under some circumstances, a school food-service director can petition the state and USDA regional office to obtain approval for spending food service funds on building or equipping a new facility. The permission to use cafeteria funds for building and major equipment purchases is not readily granted, and the approval process takes a substantial amount of time. Therefore, permission should be sought as soon as definite plans have been developed.

Some districts have found it beneficial to develop a committee to thoroughly work out the pros and cons of a central kitchen and decide the location. If such a committee is formed, a broad spectrum of participants and backgrounds should participate.

Great consideration should be invested in an undertaking of this magnitude. Again, due to the district's configuration, the distances between sites and the lack of suitable thoroughfares, it may not be more efficient or cost-effective to consider a large scale central kitchen, or a hub system. However, there is definitely some potential regarding the smaller schools with low participation. Efficiencies could be gained by preparing these meals through a hub kitchen. This is also discussed in the staffing and MPLH section of this report.

Recommendations

The district should:

1. Proceed with planned kitchen remodels for older schools as resources become available.
2. Evaluate all school site facilities for meal production capacity and establish a plan for alternative production sites.
3. Consider the authorized use of the room at Mesa Verde High School, currently designated to the PTA, as an option for additional serving space for the child nutrition program.
4. Conduct further in depth analysis to determine if a central kitchen or hub kitchens could improve operational efficiencies.
5. Consider off-site meal production for smaller schools with low participation.

Appendices

A: Meals Per Labor Hour – Detail Calculations

B: Study Agreement

Appendix A – Meals Per Labor Hour – Detail Calculations

SAN JUAN USD ELEMENTARY SCHOOLS
Meals Per Labor Hour (MPLH)
Sept 2016 #

Site #	SCHOOLS	Oct 2016 Cal Pads 1.17	Oct 2016 FRMP *	FRMP %	Breakfast September Total Claims ^	September Average Daily Breakfast Count	Breakfast Meal Equivalent (2)	Lunch September Total Claims ^	September Average Daily Lunch Count	Vended Breakfast ¢	Vended Lunch ¢	Vended B/L Equivalents (2/1)	Snack Meal Equivalent H	Snack Meal Equivalent (3)	Total Average Daily Meal Equivalent	Site Labor Hours Per Day X	MPLH
123	Howe Ave	726	692	95.3%	5451	260	130	12003	572	1932	1517	118	2353	37	857	23.50	36
112	Mary Deterling	606	234	38.6%	1109	53	26	5044	240	0	0	0	1054	17	283	8.50	33
116	Thomas Edison (K-8)	802	657	81.9%	3308	158	79	11512	548	0	0	0	2345	37	664	22.50	30
152	Whitney Ave	383	342	89.3%	4463	213	106	5880	280	0	0	0	1575	25	411	14.00	29
126	Kingswood (K-8)	582	517	88.8%	3807	181	91	8381	399	228	456	27	1425	23	540	18.00	29
111	Del Paso Manor	608	359	59.0%	2467	117	59	5599	267	0	0	0	1317	21	346	12.00	29
121	Greer	475	434	91.4%	3887	185	93	7208	343	0	0	0	2247	36	471	16.50	29
173	Ottoman Way	318	188	59.1%	1085	52	26	3444	164	0	0	0	1509	24	214	7.50	29
159	Lichen(K-8)	611	420	68.7%	2107	100	50	7528	358	229	453	27	1663	27	462	16.50	28
114	Dyer-Kelly	445	424	95.3%	3813	182	91	7046	336	237	475	28	2192	35	489	17.50	28
158	Pershing	548	188	34.3%	1182	56	28	4786	228	0	0	0	0	0	256	9.25	28
135	Northridge	443	331	74.7%	3013	143	72	6229	297	149	118	9	1171	19	396	14.75	27
103	Arlington Heights	325	196	60.3%	1615	77	38	3360	160	395	410	29	0	0	227	8.50	27
141	Pasadena Ave	333	270	81.1%	2215	105	53	4696	224	284	548	33	1263	20	329	12.50	26
108	Cottage	357	273	76.5%	2513	120	60	4120	196	192	385	23	1424	23	302	11.50	26
137	Darview	387	184	47.5%	1458	69	35	3920	187	0	0	0	0	0	221	8.50	26
131	Mariposa Ave	396	297	75.0%	2532	121	60	5156	246	441	495	34	1440	23	363	14.00	26
149	Skycrest	510	394	77.3%	3408	162	81	6664	317	235	345	22	1560	25	445	17.50	25
147	Starr King/Rich. ECE	501	426	85.0%	4032	192	96	8043	383	219	564	32	1933	31	542	21.50	25
127	Earl LeGette	543	118	21.7%	622	30	15	3738	178	0	0	0	0	0	193	7.75	25
124	Thomas Kelly	474	282	59.5%	2294	109	55	5918	282	0	0	0	1111	18	354	14.25	25
105	Camichael	379	301	79.4%	2783	133	66	5279	251	219	34	7	1348	21	346	14.00	25
146	Sierra Oaks (K-8)	729	289	39.6%	1672	80	40	5444	259	0	0	0	0	0	299	12.25	24
166	Cameron Ranch	388	279	71.9%	2727	130	65	5519	263	0	0	0	1366	22	349	14.50	24
170	Trajan	478	187	39.1%	915	44	22	4056	193	0	0	0	0	0	215	9.00	24
113	Harry Dewey	543	167	30.8%	1557	74	37	4213	201	0	0	0	0	0	238	10.00	24
162	Coyle Ave	372	282	75.8%	2223	106	53	5080	242	494	501	36	1299	21	351	15.00	23
133	Mission Ave Open	501	114	22.8%	0	0	0	2870	137	0	0	0	0	0	137	6.00	23
109	James Cowan Fund	492	167	33.9%	0	0	0	3091	147	0	0	0	0	0	147	6.50	23
130	Marionmont	619	127	20.5%	0	0	0	3327	158	0	0	0	0	0	158	7.00	23
172	Gold River (K-8)	820	153	18.7%	0	0	0	5853	279	0	0	0	0	0	279	12.50	22
119	Grand Oaks	311	220	70.7%	1557	74	37	3908	186	231	498	29	1570	25	277	13.00	21
167	Del Dayo	566	77	13.6%	0	0	0	2662	127	0	0	0	0	0	127	6.00	21
157	Charles Peck	317	247	77.9%	2211	105	53	4148	198	0	0	0	1289	20	271	13.00	21
168	Cambridge Heights	381	129	33.9%	0	0	0	2613	124	0	0	0	0	0	124	6.00	21
171	Carriage Drive	583	317	54.4%	2799	133	67	5522	268	0	0	0	1465	23	358	17.25	21
151	Twin Lakes	527	160	30.4%	0	0	0	3776	180	0	0	0	0	0	180	8.75	21
	CA Montessori				0	0	0	2776	132	0	0	0	0	0	132	6.50	20
169	Woodside				1446	69	34	4324	206	0	0	0	0	0	240	12.00	20
139	Orangevale (K-8)	660	122	18.5%	377	18	9	3225	154	0	0	0	0	0	163	8.50	19
156	Albert Schweitzer	375	157	41.9%	897	43	21	3063	146	0	0	0	0	0	167	9.00	19
120	Green Oaks Fund	504	81	16.1%	0	0	0	2231	106	0	0	0	0	0	106	6.00	18
Total (41 sites-excluding Montessori)		20427	11053		77545	3693	1846	213355	10160	5485	6799	454	35939	570	13031	505.75	26
Number of Elementary Sites		41	Vended Breakfast Equivalent		2	Lunch Meal Equivalent		2	Snack Meal Equivalent		3	Total		3			
Number of School Days in September		21	Breakfast Meal Equivalent		2	Vended Lunch Equivalent		1	Snack Meal Equivalent		1	Total		3			

* Enrollments and Eligibility based on October 2016 CAUPADS 1.17

^ Data source 2016-17 SNP claim for reimbursement, September 2016

¢ Data source Early Childhood Centers Sales Detail September 2016 (ECE Sept 2016)

Note: October claims data unavailable. Use of September participation data for MPLH may distort results as prior year eligibility remains effective until October 2016. Changes in eligibility may result in change to participation levels and MPLH

SAN JUAN USD SECONDARY SCHOOLS
Meals per Labor Hour
Sept 2016 #

Site #	SCHOOLS	Oct 2016 CALPADS Enrollment	Oct 2016 FRMP	FRMP %	Breakfast September Total Claims	September Average Daily Breakfast Count	Lunch September Total Claims	September Average Daily Lunch Count	Snack & Super Snack	Average Daily Snack Count Equivalent	Vended Breakfast ¢	Vended Lunch ¢	Vended B/L Equivalent (2/1)	September Total Ala- Carte Sales @	September Average Daily Sales	Ala-Cardé Meal Equivalent	Total Average Daily Meal Equivalent	Site Labor Hours Per Day	MPLH
Middle Schools (8 sites)																			
60	Will Rogers	732	476	65.0%	2687	128	7487	357	697	11	0	0	0	\$ 4,219.79	\$ 200.94	70	565	15.5	36
64	Churchill(Winston)	1002	385	38.4%	1496	71	5406	257	0	0	0	0	0	\$ 3,519.25	\$ 167.58	58	387	12.0	32
50	Sylvan	695	502	72.2%	3287	157	7064	336	1537	24	0	0	0	\$ 3,642.23	\$ 173.44	60	578	18.0	32
4	Barrett (John)	635	315	49.6%	3012	143	5840	278	0	0	0	0	0	\$ 5,088.90	\$ 242.33	84	506	16.0	31
61	Carnegie (Andrew)	1032	299	29.0%	1183	56	5467	260	0	0	0	0	0	\$ 5,356.06	\$ 255.05	89	405	13.0	31
65	Pasteur (Louis)	685	262	38.2%	1295	62	5068	241	658	10	0	0	0	\$ 6,599.39	\$ 314.26	109	423	14.0	30
1	Arcade	451	256	56.8%	1488	71	4052	193	0	0	0	0	0	\$ 1,778.20	\$ 84.68	29	293	12.0	24
2	Arden	941	337	35.8%	1433	68	3973	189	0	0	0	0	0	\$ 3,073.00	\$ 146.33	51	308	14.5	21
Average Middle School MPLH																			
		6173	2832	48.1%	15881	756	44357	2112	2892	46				\$ 33,276.82	\$ 1,584.61	550	3465	115.0	30
High Schools (11 Sites)																			
205	Mira Loma	1779	866	48.7%	7528	358	12249	583	0	0	0	0	0	\$ 894.07	\$ 42.57	15	957	39.5	24
202	Encina (6-12)	987	912	92.4%	7513	358	13772	656	2532	40	0	0	43	\$ 3,255.99	\$ 155.05	54	1150	51.0	23
207	Diel Campo	1740	789	45.3%	3776	180	11226	535	0	0	0	0	0	\$ 10,288.10	\$ 489.91	170	884	42.5	21
204	San Juan	644	485	75.3%	2330	111	6527	311	680	11	203	204	15	\$ 1,531.17	\$ 72.91	25	472	24.5	19
201	El Camino	1494	679	45.4%	3644	174	8939	426	0	0	0	0	0	\$ 4,544.65	\$ 216.41	75	674	37.0	18
206	Bella Vista	2007	480	23.9%	3704	176	6839	326	0	0	0	0	0	\$ 8,971.00	\$ 427.19	148	650	36.5	18
210	Mesa Verde	936	589	62.9%	3493	166	9090	433	0	0	0	0	0	\$ 2,295.46	\$ 109.31	38	637	39.0	16
209	Casa Roble	1249	414	33.1%	2835	135	6949	331	0	0	0	0	0	\$ 8,127.51	\$ 387.02	134	600	39.5	15
208	Rio Americano	1685	336	19.9%	2985	142	5228	249	0	0	0	0	0	\$ 4,854.34	\$ 231.16	80	471	34.25	14
219	La Entrada Continuation	67	54	80.6%	49	2	238	11	0	0	0	0	0	\$ 5.09	\$ 0.24	0	14	4.0	3
230	El Sereno Alternative (1)	203	85	41.9%		0	0	0	0	0	0	0	0	\$ -	\$ -	0	0	0.0	
Average High School MPLH																			
		12791	5689	51.8%	37857	1803	81057	3860	3212	51	618	891	57	\$ 44,767.38	\$ 2,131.78	740	6511	347.8	19
Total Secondary MPLH																			
		18964	8521	50.2%	53738	2559	125414	5972	6104	97	618	891	57	\$ 78,044.20	\$ 3,716.39	1290	9975	462.8	22
Special Programs																			
Special Education Centers (2 sites)																			
163	Laurel Ruff Transition	99	54	54.5%	491	23	1029	49									72	6.0	12
222	La Vista	66	54	81.8%	660	31	936	45						\$ 71.19	\$ 3.39	1	77	5.5	14
Early Childhood Education Sites (6 sites)																			
1	Coleman, Sunrise Tech & Fair Oaks				0	0	0	0			2131	2450	167				167	7.0	24
1	Marshall & Garfield				0	0	0	0			2715	2427	180				180	9.0	20
1	General Davie Primary Center				157	7	161	8			1139	1618	104				119	5.0	24
Average Special Program MPLH																			
					1308	62	2126	101			5985	6495	452				616	32.5	19

Sources & Factors

Number of Secondary Sites 18 Number of Special Program Sites 8 Vended Breakfast Equivalent 2 Lunch Meal Equivalent 1 Snack Meal Equivalent 3 Ala-Cardé Meal Equivalent 2.88 (daily sales/\$2.88)

of School Days in September 21

* Enrollments and Eligibility based on October 2016 CALPADS 1.17
 ^ Data source 2016-17 SNP claim for reimbursement, September 2016
 a Data source Early Childhood Centers Sales Detail September 2016 (ECE Sept 2016)
 c Data source 2016-17 Position Control Report

(1) These sites are located and/or have food services provided by other sites.

Note: October claims data unavailable. Use of September participation data for MPLH may distort results as prior year eligibility remains effective until October 2016. Changes in eligibility may result in change to participation levels and MPLH calculation

MPLH	Elementary	Secondary	Special Programs	Combined	%
>/= 28	11	6	0	17	25.4%
20-27	27	5	5	37	55.2%
<20	3	7	3	13	19.4%
	41	18	8	67	

October 2015 CALPADS 1.17	Oct 2016 CALPADS 1.17	Oct 2016 FRMP	FRMP %
39985	20427	11053	54.1%
	18964	8521	44.9%
	0	0	#DIV/0!
39985	39391	19574	49.7%
San Juan Choice Charter			
	214	116	
	5282	2533	
	5496	2649	
	44887	22223	

Visions In Education Charter

Appendix B – Study Agreement



CSIS California School Information Services

FISCAL CRISIS & MANAGEMENT ASSISTANCE TEAM STUDY AGREEMENT February 25, 2016

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

1. Examine the food service department's operational processes and procedures in areas including but not limited to food preparation, meal service, student participation, staffing, federal and state compliance, menu planning, purchasing, warehousing and food storage, inventory, and facilities, and make recommendations for improved efficiency, if any.
2. Evaluate the department's 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.
4. Review the feasibility of provisional meal alternatives and central kitchen versus decentralized kitchen options.

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:

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

Other equally qualified staff or consultants will be substituted in the event one of the above individuals is unable to participate in the study.

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 cost of the study will not exceed \$31,200.

- 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: Kent Stephens, Chief Financial Officer
 Telephone: (916) 971-7237
 E-mail: kent.stephens@sanjuan.edu


 Kent Kern, Superintendent
 San Juan Unified School District

3/2/16
 Date


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

February 25, 2016
 Date

APPROVED AS TO FORM


 Linda C.T. Simlick
 General Counsel, SJUSD

Date