

# A FEASIBILITY REPORT ON

The Implementation of Food and Nutrition  
Guidelines for City- Authorized Schools

Submitted by: Gayle Peay, Policy Analyst  
Marquette University  
Institute for the Transformation of Learning

For: The Charter School Review Committee  
August 31, 2017

## Charter School Review Committee Food Nutrition Feasibility Study

### Substitute resolution relating to nutrition guidelines at City-authorized charter schools.

#### Executive Summary

This executive summary includes the feasibility and its primary recommendations for implementing food and nutrition guidelines at City of Milwaukee-Authorized Charter Schools. This report was prepared by Gayle Peay, Policy Analyst for the CSRC and is in response to the resolution by the Common Council of the City of Milwaukee. The resolution asked the CSRC to “study the feasibility cost and effectiveness of developing and implementing meal nutrition and service guidelines for City-authorized schools with the goal of reducing the risk of children’s lead absorption and potentially improving students’ academic and cognitive performance and overall health”.

The recommendations of this report are based on information gathered from city-authorized schools of their current food and nutrition practices. School leaders provided input through face-to-face meetings and through a survey that polled them on how the proposed resolution would affect their school budget and overall educational program. Additionally, extensive research was conducted on best-practices and the DPI requirements of participating in national food service programs.

As with many aspects of charter school autonomy, navigating the systems associated with food service guidelines presents opportunities and challenges. Despite it not being a requirement, most of the city-chartered schools already participate in school nutrition programs and meet the state and federal guidelines. The goal of this report is to provide transparency and to take into consideration the diverse needs of each school authorized by the City.

**Operational Feasibility;** To fully understand the functionality of the proposed resolution the operational feasibility was examined by assessing each of the numbered proposed guidelines:

1. *Each City-authorized charter school to provide a free breakfast to all of the school’s enrolled pupils if, in the prior school year, seventy percent or more of the pupils of that school met the income eligibility standard for free or reduced-price lunch in the federal school lunch program under 42 U.S. Code § 1758(b) or the school meets USDA Community Eligibility Provision requirements.*

#### Findings and Recommendations (1)

- Currently, 6 of the 8 city-authorized schools participate in the National Breakfast Program. The schools that do not currently participate are Escuela Verde and Downtown Montessori. While Escuela Verde is very committed to providing nutritional free meals to their students, they have not participated in any of the federal food programs. However, they mentioned that they plan on applying to the breakfast program next year but will need a substantial amount of training. Downtown Montessori doesn't offer free breakfast because only 25.5% of their students qualify for FRP meals.
- This proposed guideline is feasible because all eligible city charters (who meet the income eligibility standard for free or reduced lunch in the federal program) are already providing free breakfast.

2. *A City-authorized charter school that provides a free breakfast to all of the school's enrolled pupils to offer and serve breakfast after the start of the school day as follows:*

*a) An elementary school shall offer breakfast in the classroom each day.*

*b) A middle or high school shall offer alternative serving models, such as breakfast in the classroom or grab-and-go carts, in one or more locations with high student traffic, other than the cafeteria, each day to increase breakfast participation.*

*c) These requirements shall not apply to a school in which the school's current breakfast participation rate exceeds seventy-five percent of the school's average daily lunch participation rate.*

### **Findings and CSRC Recommendations (2 a,b,c)**

- While 4 of 8 city-authorized schools participate the Breakfast-In-Classroom Models (BIC), this model presents several operational and budget challenges. For example, DLHA reported that they provide a full hot breakfast 2 times a week and have noticed an increase in breakfast participation on those days. The BIC model would prevent them from serving hot breakfast, a practice that parents look forward to.
- **Schools reported the following operational challenges associated with the BIC model:**
  1. Cost of supplies for each classroom estimated at \$4,000.00 extra per year (i.e. towels, bleach, brooms, gloves, buckets, carts, sanitizers)
  2. Loss of instructional time in the morning; requiring teachers to clean up after students and performing other duties outside of teaching.
  3. Time restraints for training teachers/staff
  4. Additional administrative support to collect required data
  5. Space restrictions in classrooms
- **The charter schools that prefer the traditional model provided the following rationale of why it works for their school culture:**
  1. School buses arrive in a timely fashion, and early enough so that participating students may be served their breakfasts and eat them without feeling rushed
  2. The cafeteria is available and conveniently located
  3. There is high demand for hot foods at breakfast
  4. The school's counting and claiming apparatus does not support alternative service methods
- **It is recommended that city-authorized schools continue to have the option of offering traditional breakfast in conjunction with one of the alternative service models, in efforts to further boost participation. For example, grab and go breakfast could be available for students who come to school late or those who missed traditional breakfast in the cafeteria.**

3. *City-authorized charter schools to participate in the Child and Adult Care Food Program (CACFP) Afterschool Meals program, if eligible, or an equivalent program.*

**Findings and CSRC Recommendations (3)**

- The CACFP Program seems to be the program that is least familiar to city- authorized charters, however schools are familiar with and have participated in the After-School Program (ASSP).
- Only 2 schools currently (Milwaukee Collegiate Academy and Rocketship Southside Community Prep) participate in the CACFP program. This suggests that schools need would need training and extensive information on the application process and implementation requirements.
- **It is recommended that the language in this requirement be changed to:** *“City-authorized charter schools who offer after-school programs, to participate in the Child and Adult Care Food Program (CACFP, After School Snack Program (ASSP), or an equivalent program, if eligible.”*

4. *City-authorized charter schools to ensure that school meal menus provide pupils access to nutrients that support immune function, help children achieve and maintain a healthy body weight, and reduce the risk of developing health problems, and to key nutrients that mitigate lead absorption, specifically vitamin C, iron and calcium.*

**Findings and CSRC Recommendations (4)**

- U.S. Department of Agriculture regulations require the Department of Public Instruction (DPI) to conduct a comprehensive Administrative Review (AR) of School Food Authorities(SFA) administration of the National School Lunch Program, School Breakfast Program, and other school nutrition programs during a **three- year review cycle**. DPI ensures that schools are meeting USDA meal pattern requirements, review menus, production records, recipes and observe meal service. At the end of the review each school receives a corrective action plan if necessary.
- A component of this review includes *“The Dietary Specifications and Nutrient Analysis.”* This review details whether meals served to children through the school meal programs are consistent with federal standards for calories, saturated fat, sodium and trans fat. DPI works with each school to obtain current data. If a school is determined to be at high- risk for nutrition errors, then DPI performs a targeted menu review using USDA-approved nutrient analysis software.
- **It is recommended that the School Nutrition Program Administrative Review be used as the document for the monitoring school menus of city-authorized charter schools.**

5. *The CSRC to annually examine the school meal menus of City-authorized charter schools to ensure that menus provide pupils access to nutrients that support immune function, help children achieve and maintain a healthy body weight, and reduce the risk of developing health problems, and to key nutrients that mitigate lead absorption, specifically vitamin C, iron and calcium.*

#### **Findings and CSRC Recommendations (5)**

- Because the DPI Administrative Review (AR) is conducted every 3 years, operationally it would be extremely difficult for CSRC to examine the menus on an annual basis. However, since the beginning of 2017, all AR reports have been required to be posted on the DPI website within 30 days of the review.
- **It is recommended that city charters provide the latest copy of their School Nutrition Program Administrative Review, which has data related to the school's menus and its nutrients. Accordingly, to optimize adoption of this resolution, it would be desirable if CSRC's reporting of this guideline could take place in conjunction with DPI's 3-year cycle.**
- **It is recommended that the language in this requirement be changed to the following:**  
*"The CSRC to examine the most current School Nutrition Program Administrative Review to ensure that menus provide pupils access to nutrients that support immune function, help children achieve and maintain a healthy body weight, and reduce the risk of developing health problems, and to key nutrients that mitigate lead absorption, specifically vitamin C, iron and calcium."*

6. *The CSRC to collect data and report annually to the Common Council concerning which City-authorized charter schools participate in the:*

a) *CACFP Afterschool Meals program or equivalent program and, if so, the number of children served snacks or suppers on an average daily basis at each school.*

b) *USDA Fresh Fruit and Vegetable Program or equivalent program and, if so, the number of children served snacks under the program on an average daily basis at each school.*

c) *USDA Summer Food Service Program or equivalent program and, if so, the number of breakfasts, lunches, suppers and snacks served on an average daily basis during the preceding summer for each school.*

d) *National School Breakfast Program and, if so, the schools' breakfast service model and the number of children served breakfast under the program on an average daily basis.*

#### **Findings and CSRC Recommendations (6 a,b,c,d)**

- According to most of the schools, submitting data about their participation in food service programs is feasible because they are already tracking this information.
- **It is recommended that city charters submit data annually to the CSRC regarding their participation and daily averages in the CACFP, Fresh Fruit and Vegetable Program, Summer Food Service Program and the National.**

*7. The CSRC to provide annual reports to the Common Council on nutrition in City-authorized charter schools.*

**Findings and CSRC Recommendations (7)**

- The CSRC already provide financial and academic performance data to the Steering and Rules Committee annually. A nutrition report could be added to this annual presentation.
- **It is recommended that 2017/2018 school-year be used as a pilot year to monitor the aforementioned guidelines and report data to the Common Council during the 2017/2018 annual presentation.**