Wellness Policy Compliance Report
Independent School District 283

Date: December 21, 2011
To: Dr. Debra Bowers
Superintendent
From: Kathleen A. Milbrath, SNS
Supervisor of School Nutrition
Re: School Board Policy 533 Compliance Report

The Compliance Report addresses the following in Section III and all references are to the outline annotations in the Wellness Policy:

III. GUIDELINES
   A. Foods and Beverages
      1. All foods and beverages made available on campus (including concessions and a la carte cafeteria items) will be consistent with the current USDA Dietary Guidelines for Americans.
      Breakfast and lunch menus are designed following the USDA Regulations and the most recent key elements of the Dietary Guidelines for Americans. Additionally, the issues addressed in the Healthy, Hungry Free Kids Act of 2010 are being implemented as regulations are received from the USDA.
      We continue to make changes that meet all requirements and we continue in a steady incremental way to increase from scratch choices that allows for students tasting and student acceptance. This has proven successful and we anticipate that the “steady as you go change” approach will continue to be acceptable.

      a. Use low-fat milk, cheese and yogurt for healthier school meals. All milk served with lunch and in the cafeteria a la carte area is either 1% or skim milk and flavored skim milk. All milk served with breakfast is unflavored skim or 1%. In 2010, our dairy lowered the sugar in the flavored milk. Entrée items have both low-fat and regular cheese, and yogurt is used as part of certain menu items. Whole and 2% milk is used, if necessary, for a given student or for our very little children in baby, toddler or pre-school programs. Our dairy provides milk from cows not treated with the additional hormone rBST/rBGH. Lactose reduced milk is available based on parent request.
b. **Fruits and Vegetables** – Fresh fruit and vegetables are offered with most lunch meals. Canned fruit in natural juice or light syrup is offered everyday with meals. Juice is offered as an additional choice with canned and fresh fruit at breakfast. Seasonal fruit is problematic living in Minnesota and we purchase as much as possible. Price and availability are the two main determiners in what is purchased.

c. **Whole grains** are used where ever practical. This year we switched to a company that provides our bread with 53% whole grain. Recently they eliminated the potassium bromated from the flour. While this makes for a far less shelf stable product, it does eliminate a chemical from the ingredient list. Most entrees with grain products have 51% whole grain. Higher levels have been found to be unacceptable to the majority of students. We have had some acceptance problems with the 53% but slowly students have accepted the higher whole grain. High fructose corn syrup has been eliminated from many of the bread items we purchase. The majority of our entrée items, i.e., pizza, chicken patties, nuggets, etc., are now made with whole grains. Brown rice is being used in place of white rice.

d. **Trans fats** are still used to a limited degree in some items, like crackers, baked goods, etc.. Manufacturers have limited the percent of trans fat to less than 2% in the few items where it is still present. The concern with total elimination of trans fats, is what will be used in place by manufacturers to provide shelf stable products. And, what will be the long term health issues with any changes. The ingredient labels for food used in district meals are listed on the district web site. Trans fat naturally occur in food from animal sources. Ingredient Labels were put on the district web-site in 2008 and are reviewed and changed at least yearly. Manufacturers change food formulas often and that is why we have a disclaimer regarding accuracy.

e. **Fats and saturated fats.** Our planned menus are at less than 30% total fat and less than 10% fat by age group according to the Recommended Dietary Allowances (RDA’s) over the course of one month..

f. Planned menus consistently meet RDA’s by age group over the course of a month. This information is available on the district web-site for all three student levels. Nutritional Analysis has been in place since 2006 and is maintained on the district web-site. In conversation with the district nurse, nutritional analysis information was eliminated from the back-pack menu.
g. Special menus and dietary needs of individual students are addressed as needed. Vegetarian options are available at all buildings every day. Managers and lead personnel make every accommodation possible to meet the nutritional needs of our students.

h. The food and beverage areas needing to be addressed are the athletic concessions, some vended a la carte items and the DECA store which sells theatre size candy boxes and very large sugar beverage containers.

i. Additional initiatives for the 2011-2012 school year include:
   1. Ever Thursday we have a chef working in the district work with our staff, developing from scratch recipes that are taste tested with students. This has proven to be a very successful initiative. The students have enjoyed the taste testing and continue to provide “thumbs or thumbs down” response to these recipes. Acceptable recipes will be offered on the spring menu cycle and the recipes will be on the school nutrition web site for a family of 6.
   2. SNAC – a School Nutrition Advisory Committee of community members with children in the district will meet three times this year and four times during the 2012-2013 school year. Their charge is to offer recommendations regarding the school nutrition program to the Director of Business Services. Recommendations will be implemented if it is fiscally possible.
   3. A community presentation was held November 17, 2011, regarding the past, present and future efforts of the Department of School Nutrition. It was taped and played multiple times on cable Channel 14.
   4. We continue to change out food items to healthier options. All beef hot dogs are now grass feed, gluten free, and Omega 3 rich. The challenge is that they cost 2 ½ times more than the previous product. Additionally, because they have a casing, children do not find them as acceptable as the product we used in prior years. Our counts have gone down on hot dog day. These are some of the trade-offs we make as we change products.
   5. Cinnamon rolls have been eliminated from the breakfast program.
   6. Corn dog nuggets have been eliminated from the lunch program.
   7. Every effort is made to avoid repeating entrees during a 20 day cycle.
   8. The cold sandwich offering allows students to select from the same side items offered to students who receive the hot entrée. The elementary and junior high students have really enjoyed this change.
   9. School Nutrition kitchens may apply for the Golden Tray Award that is a program established this year to measure individual kitchen performance.
in four areas in relation to the district mission statement in support of educating children.

10. Peter Hobart elementary has lunch after recess which takes away some of the anxiety of wanting to eat fast and then go outside.

11. We have a new school nutrition web site that, in addition to menus, has a tremendous amount of information for students, parents and teachers. It can be translated into many different languages with the simple click of a button.

2. Food service personnel will make every effort to ensure that student access to food and beverages meet or exceed all federal, state, and local laws and guidelines. A review of these issues suggests that there needs to be further attention to the matter of other foods sold on campus outside the cafeteria. This is particularly an issue at the High School level.

3. The Food service personnel adhere to all federal, state, and local food and security guidelines. HACCP (Hazard Analysis Critical Control Point) plan has been in place since 2005 and is reviewed annually for changes. School kitchens are licensed through the City of St. Louis Park Department of Inspections and are inspected two times a year. Any violations are addressed immediately. All kitchens have at least one person Certified as a Food Manager through the State of Minnesota. This certification and recertification is paid through 02 Funds. Recalls are addressed immediately. Food is removed from service as soon as we are notified either by the Department of Health, the vendor or MDE-FNS. If the evening news covers a major recall like spinach, I call the Production Manager and we discuss how we will proceed with the removal or the item and the notification of school nutrition staff and principals by the next morning. The item will not be served the next day or until the recall restrictions are lifted by the health department.

4. Every effort is made to eliminate any social stigma attached to, and prevent the overt identification of, students who are eligible for free and reduced-priced school meals. Cashiers are trained annually and they are very serious about protecting the confidentiality of students. Applications are handled by all school nutrition staff to ensure the confidentiality of the student.

5. All building principals report that students have access to hand washing or hand sanitizing before they eat meals or snacks. One building would like hand sanitizers but the information from the City of St. Louis Park is that hand sanitizers are not as effective as people think and hand washing is always the best means of sanitizing hands before a meal.
6. All building principals report that students have sufficient time to eat after sitting down for school meals and they have scheduled meal periods at appropriate times during the school day.

7. Tutoring, club or organizational meetings or activities during mealtimes are discouraged unless students may eat during such activities. This does not seem to be an issue at any building.

B. School Food Service Program/Personnel

1. The school nutrition program provides healthy and safe school meal programs that strictly comply with all federal, state and local statues and regulations. This issue is taken very seriously by all school nutrition staff. Training to re-enforce statues and regulations is on-going.

2. As the Supervisor of the school nutrition department, it is my responsibility to have guidelines and procedures for selecting food items. I believe we do a consistent job in addressing the federal and state required guidelines for breakfast and lunch. This annual report reflects the need for guidelines and procedures in the non-meal areas of food availability.

With the passage of the Healthy, Hungry Free Act of 2010 new regulations are being developed and we are implementing those regulations as they are sent to us. USDA has not yet set forth the changes in meal patterns that are based on the IOM Standards.

The new Standards will be included in our planning when we receive the guidance from the USDA. The biggest concern with the IOM Standards is the unfunded cost to implement all of the Standards.

Customer preference is monitored monthly through counts and participation and from comments from our customers and calls from parents. Cost of food items is always a significant component in determining what to purchase and serve. This year, our food costs are running higher than normal and this is creating a financial strain on our food budget.

3. School Meals personnel attend a yearly fall in-service with personnel from two other districts. This training includes, Employee Right-To-Know, Food Safety, Offer vs Serve and Civil Rights training. A guest speaker provides training on topics such as the importance of quality customer service.

New employees view two training films regarding meal pattern and food safety. Eleven of the staff have completed the Level I, II, or III National Certification Program offered by the National School Nutrition Association. The department supervisor has national certification as a School Nutrition Specialist. Certification classes are
available throughout the year and school nutrition staff take these classes to obtain or maintain national certification. All managers and lead personnel are provided a 3-4 hour training session regarding topical areas usually in February. This workshop is conducted with managers and lead people from districts in the West Suburban area. Usually 150 attend. Eight of the attendees are from our staff.

C. Nutrition Education and Promotion
1. Teachers teach the district science/health outcomes. All building principals report that healthy nutrition is embedded in the curriculum at multiple levels.

2. A la carte items are not available to elementary students. The junior high and high school students have access to multiple items and this area could use careful re-examination regarding items sold in the school store, some fund raising, concession stands and certain vending items

3. The schools do not use or withhold food as punishment. Each school reports a small amount of food used in very specific program situations. This may happen once or twice a year.

D. Physical Activity
1. Physical education is available for 30 minutes on a daily basis for elementary students and in courses offered through the 10th grade. Junior high and high school students are encourage to participate in extracurricular activities that support student physical activity.

2. When appropriate and where appropriate, teachers incorporate physical activity in other subject lesson plans.

3. Where appropriate, teachers at the elementary level incorporate physical activity for students throughout the day.

E. Communication with Parents
1. The school district web-site and the back of the elementary menu have been used to provide information to parents regarding changes in the school meals program. Short new spots called “What’s Cooking” are sent to the principal each month and included in the principal newsletters when possible. Both the menu and the web-site will continue to be used as a method to provide information to parents regarding the school meals program. Parents and students are always sharing their thoughts and ideas about the department and how we can better
meet the needs of students. Some ideas we can incorporate immediately and other ideas are added to our yearly planning.

2. The SNAC members will be a wonderful resource of information as they communicate with parents and parent groups.

IV. IMPLEMENTATION AND MONITORING

There appears to be significant compliance with the district Wellness Policy save for the issue of certain non-menu food and beverage items available at the junior and senior high. This issue will be addressed at the direction of the Superintendent. Changes will be incorporated where possible.

References:

1. School Board Policy – Wellness Policy 533
2. USDA Memo – Incorporating Guidelines for Americans into School Meals.
4. USDA Memo TA 01-2011, October 22, 2010, Competitive Food Services Regulation
7. Conversations and information received from school principals.
8. Wellness Policy Compliance Report 2010