CALIFORNIA STATE AUDITOR

California's Charter Schools

Some Are Providing Meals to Students, but a Lack of Reliable Data Prevents the California Department of Education From Determining the Number of Students Eligible for or Participating in Certain Federal Meal Programs

October 2010 Report 2010-104

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October 21, 2010 2010-104

The Governor of California
President pro Tempore of the Senate
Speaker of the Assembly
State Capitol
Sacramento, California 95814

Dear Governor and Legislative Leaders:

As requested by the Joint Legislative Audit Committee, the California State Auditor presents its audit report on how the nutritional needs of charter schools students are met, so the Legislature can make future decisions regarding the health and education of California's children.

This report concludes that the California Department of Education (Education) databases are not reliable enough for it to accurately identify all California charter schools that participate in the federal School Breakfast program (breakfast program) or the National School Lunch Program (lunch program). Moreover, Education cannot determine the number of students at either traditional or charter schools who qualify for or who participate in these programs. Despite the limitations of Educations' data, we were able to identify 815 charter schools active in California as of April 2010. Charter schools are exempt from many of the laws that apply to school districts. In particular, they are exempt from California law that requires schools to provide each needy student with one nutritionally adequate free or reduced-price meal during each school day. Further, as is true for school districts, participation by charter schools in both the breakfast and lunch programs is voluntary.

According to Education's data, 451 charter schools were participating in the breakfast or lunch program and an additional 151 were providing instruction to their students outside the classroom either online or independently, and thus do not provide meals. We surveyed the remaining 213 charter schools to identify those that provide an alternative meal program and those that do not provide meals to their students. Of the 133 responses we received, 46 charter schools stated that they offer their students an alternative meal program, 39 stated that they do not provide meals to their students, and 41 stated that they were in fact participating in the programs. The remaining seven do not provide meals either because their students receive instruction outside the classroom or their students are age 18 or older and are not eligible to participate in the programs.

The 46 charter schools that reported they provide an alternative meal program cited varying methods of providing meals, ranges of costs for those meals, and reasons for offering such meals. For example, most of these schools either have staff prepare and deliver the meals or hire contractors to do so. Some of these charter schools stated that they provide meals that meet or exceed the U.S. Department of Agriculture's nutritional standards. Generally, the charter schools that reported they provide meals to their students believe that the nutritional needs of their students, including their low-income students, are being met. The 39 charter schools that did not provide meals to their students cited various reasons including lack of a kitchen, cafeteria, or other facility to prepare and deliver meals to their students. Another reason commonly cited was a lack of funding and staffing to operate an alternative meal program or participate in the breakfast and lunch programs.

Respectfully submitted,

Elaine M. Howle

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State Auditor

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Summary

Results in Brief

In investigating how the nutritional needs of charter school students are being met, so that the Legislature can make future decisions regarding the health and education of California's children, we were hampered by a lack of data. Specifically, we found that data from California Department of Education (Education) databases are not sufficiently reliable to determine the exact number of California charter schools participating in the federal School Breakfast Program (breakfast program) or the National School Lunch Program (lunch program). Moreover, the data are not sufficiently reliable to identify the number of students at either traditional or charter schools who qualify for or participate in these programs.

Under the Charter Schools Act of 1992, teachers, parents, students, and community members are encouraged to establish and maintain charter schools that operate independently from the existing school district structure. Although charter schools operate independently, they are part of the public school system and can serve students in kindergarten through grade 12. Charter schools are exempt from many of the laws that apply to school districts. In particular, they are exempt from the law that requires schools to provide each needy student with one nutritionally adequate free or reduced-price meal during each school day. Further, as is true for school districts, participation by charter schools in both the breakfast and lunch programs is voluntary.

The breakfast and lunch programs are federally assisted meal programs operating in public and nonprofit private schools. School districts and independent schools that choose to take part in the breakfast and lunch programs get a cash subsidy from the U.S. Department of Agriculture (USDA) for each meal they serve. In return, they must serve meals that meet federal requirements and offer free or reduced-price meals to eligible children.

The data from Education are not sufficiently reliable to determine the exact number of charter schools and their students participating in the breakfast and lunch programs. For example, Education's Consolidated Application Data System (ConApp database), a paperless system, has three data fields that are relevant to our audit. These fields are designed to capture the number of students enrolled at a given school, the number of those enrolled students who are eligible to receive free meals, and the number of those enrolled students who are eligible to receive reduced-price meals. However, Education lacks an internal control process, such as a systematic review of the local educational agencies' and

Audit Highlights . . .

Our review of the California Charter Schools and how the nutritional needs of their students are being met, revealed the following:

» *The California Department of Education's (Education) databases are not sufficiently reliable to identify the number of charter schools and their students participating in the federal School Breakfast Program (breakfast program) or the National School Lunch Program (lunch program).*

- *It lacks an internal control process to ensure the accuracy of certain data in its paperless consolidated application database.*
- *It does not verify certain codes and the site type on the schools' site applications and we found errors.*
- *It allows school food authorities to combine information for their sites before entering it into the child nutrition database and thus, it cannot differentiate between charter school students and students from traditional schools who participate in the programs.*

» *Despite Education's data limitations, we identified 815 charter schools active in California. Of these, 451 were participating in the breakfast or lunch program and 151 do not provide meals because instruction is provided outside the classroom—either online or independently.*

continued on next page . . .

» *We surveyed the remaining 213 charter schools, and of the 133 that responded, 46 stated they offer their students an alternative meal program and have varying methods of providing meals and a range of meal costs; 39 stated they do not provide meals to their students mainly because they lack resources such as funding, staff, and a kitchen, cafeteria, or other facility to prepare and deliver meals; and 41 stated that they do in fact participate in the programs.*

direct-funded charter schools' supporting documentation, to ensure the accuracy of these three data fields. In addition, Education does not require all direct-funded charter schools to submit their information using the ConApp database.

Education's Nutrition Services Division uses its Child Nutrition Information and Payment System (CNIPS) database for school food authorities to submit and track the status of their applications and reimbursement claims for the meals the schools under their jurisdiction serve to students under the breakfast and lunch programs. A school food authority is defined as an entity that is responsible for the administration of one or more schools and has the legal authority to operate a breakfast or lunch program or is approved by the USDA's Food Nutrition Service to operate a breakfast or lunch program. For example, a school district or a county office of education may operate as a school food authority. In addition, certain entities, such as residential care facilities, may be approved by the USDA to operate a program. The school food authority must submit to Education an application for any school in which it desires to operate a breakfast or lunch program and a policy statement regarding free and reduced-price meals. The school food authority must include in its application information related to its food safety inspections, verification reports, and annual audits, as well as a site application for each school it sponsors.

Education performs reviews of a sample of the schools under the jurisdiction of the school food authorities each year, in accordance with federal regulations, to ensure that the requirements of the lunch program are being met. However, its reviews do not include a procedure for verifying the accuracy of the county-district-school (CDS) code or the site type reflected on the schools' site applications. Therefore, Education is unable to accurately identify all charter schools participating in the breakfast and lunch programs. We found errors related to the CDS codes and the site type. Specifically, three charter schools with CDS codes in the CNIPS database did not match the CDS codes in Education's Charter Schools Database, and eight charter schools had no CDS codes in the CNIPS database. Also, two charter schools participating in the breakfast and lunch programs were misidentified on the school food authorities' applications—one as a private school and one as a county office of education.

In addition, the CNIPS database has data fields for the school food authorities to enter the number of students approved for free and reduced-price meals at each site under their jurisdiction. However, Education allows the school food authorities to combine the information for their sites before entering it into the CNIPS database. Therefore, although Education can report the total number of students for each school food authority, it cannot

differentiate between charter school students and students from traditional schools who are participating in the breakfast or lunch program.

Despite the limitations of Education's data, we were able to identify 815 charter schools active in California as of April 2010.[1] According to the data, 451 were participating in the breakfast or lunch program and an additional 151 were providing instruction to their students outside the classroom, either online or independently, and thus do not provide meals. We surveyed the remaining 213 charter schools to identify those that provide an alternative meal program and those that do not provide meals to their students. Of the 133 responses we received, 46 charter schools stated that they offer their students an alternative meal program, 39 stated that they do not provide meals to their students, 41 stated that they were in fact participating in the programs, and four stated that they provide instruction based outside the classroom. In addition, three charter schools stated that they do not provide meals to students or participate in the breakfast and lunch programs because their students are age 18 or older and are not eligible to participate in the programs.

The 46 charter schools responding to the survey that provide an alternative meal program have varying methods of providing meals, ranges of meal costs, and reasons for offering an alternative meal program. Most of these schools either have their staff prepare and deliver the meals or hire contractors to do so. The students at these charter schools paid between 50 cents and $5 for their meals. In addition, the primary reason cited by 15, or 33 percent, of these schools for having an alternative meal program is to allow them to provide what they described as fresher, healthier food choices to their students than the breakfast or lunch program provides. Some of these charter schools stated that they provide meals that meet or exceed the USDA's nutritional standards. Generally, these charter schools believe that the nutritional needs of their students, including low-income students, are being met.

As mentioned previously, state law does not require charter schools to provide each needy student with one nutritionally adequate free or reduced-price meal during each school day. The 39 charter schools that do not provide meals to their students gave various reasons for not participating in the breakfast and lunch programs

[1] The number of active charter schools was obtained from Education's Charter Schools Database. However, we could not test the information in the database against source documents. Further, we found that the Charter Schools Division does not conduct audits or perform reviews of the information stored in the database. Therefore, we concluded that the information from the database was of undetermined reliability to reach an audit conclusion related to the number of active charter schools in California. We present this information because there was no better source from which to obtain this information.

and not providing an alternative meal. The primary reason was lack of a kitchen, cafeteria, or other facility to prepare and deliver meals to their students. Another reason commonly cited was a lack of funding and staffing to operate an alternative meal program or participate in the breakfast and lunch programs. Generally, however, these charter schools believe that the nutritional needs of their students, including their low-income students, are being met. Many of the schools stated that their students bring lunch from home. We also found that some of these charter schools inform parents via handbooks that can be found on their Web sites that they do not provide meals. Thus, when parents choose to pack their children's lunch and schools make parents aware of the fact that they do not provide meals, it becomes the parents' responsibility to ensure that their children's nutritional needs are met.

Recommendations

To ensure the reliability of the ConApp database fields related to the number of students enrolled at the school level, the number of those enrolled students who are eligible to receive free meals, and the number of those enrolled students who are eligible to receive reduced-price meals, Education should establish an internal control process such as a systematic review of a sample of the local educational agencies' and direct-funded charter schools' supporting documentation.

To ensure the accuracy of the CNIPS database, Education should:

- Direct the school food authorities to establish procedures to ensure the accuracy of the application information they enter into the CNIPS database.

- Modify the tool it uses to review a sample of the school food authorities' schools to include a procedure for verifying the accuracy of the CDS code and site type reflected on the schools' applications.

- Discontinue allowing the school food authorities to combine each site under their jurisdiction before they enter information on the number of students approved for free and reduced-price meals into the CNIPS database.

Agency Comments

Education generally agreed with our recommendations. However, Education did not address fully one recommendation aimed at ensuring the accuracy of its CNIPS database and it is considering the actions it will take regarding two other recommendations.

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Introduction

Background

Under the Charter Schools Act of 1992 (Act), teachers, parents, students, and community members are encouraged to establish and maintain charter schools that operate independently from the existing school district structure. The intent of the Act is to improve student learning, increase learning opportunities for all students, encourage the use of different or innovative teaching methods, create professional opportunities for teachers, provide parents and students with expanded choices for educational opportunity, hold schools accountable for meeting measurable student outcomes, and provide vigorous competition within the public school system.

Although charter schools operate independently from the existing school district structure, they are part of the public school system and can serve students in kindergarten through grade 12. They are publicly funded, serve diverse populations, and employ a variety of educational philosophies. Typically, a group of parents, teachers, and community members develops a charter petition, which they then submit to a chartering entity for approval. Under the Act, a chartering entity can be a school district, a county board of education, or the State Board of Education (state board). Once approved, the petition becomes the governing document for the school and the school must comply with the Act. As of April 2010, according to data from the California Department of Education (Education), there were 815 active charter schools throughout California.[2]

California law requires each school district or county superintendent of schools that offers instruction in kindergarten through grade 12 to provide each needy student one nutritionally adequate free or reduced-price meal during each school day. To comply with this requirement, school districts and county offices of education may use funds made available through any federal or state program that provides meals to students, including the federal School Breakfast Program (breakfast program) and the National School Lunch Program (lunch program). The Act exempts charter schools from many of the laws that apply to school districts,

[2] The number of active charter schools was obtained from Education's Charter Schools Database. However, we could not test the information in the database against source documents. Further, we found that the Charter Schools Division does not conduct audits or perform reviews of the information stored in the database. Therefore, we concluded that the information from the database was of undetermined reliability to reach an audit conclusion related to the number of active charter schools in California. We present this information because there was no better source from which to obtain this information.

including the law requiring free or reduced-price meals for needy students. Further, similar to school districts, participation by charter schools in the breakfast or lunch program is voluntary.

The breakfast and lunch programs are federally assisted meal programs operating in public and nonprofit private schools. School districts and independent schools that choose to take part in the breakfast and lunch programs get a cash subsidy from the U.S. Department of Agriculture (USDA) for each meal they serve. In return, they must serve meals that meet federal requirements and must offer free or reduced-price meals to eligible children. Both programs require that the meals meet the applicable recommendations established in *Dietary Guidelines for Americans*, a joint publication of the U.S. Department of Health and Human Services and the USDA. For example, the guidelines recommend that for the lunch program no more than 35 percent of an individual's calories come from total fat and less than 10 percent from saturated fat. Federal regulations also establish the minimum nutrient standards for school breakfasts and lunches related to recommended dietary allowances for protein, vitamin A, vitamin C, iron, and calcium, as well as the minimum calorie levels.

The breakfasts and lunches served by schools must meet federal nutrition requirements, but decisions about the specific foods to serve and how to prepare them are made by their school food authorities, which are the entities federal regulations designate to administer the programs. Specifically, a school food authority is defined as an entity that is responsible for the administration of one or more schools and has the legal authority to operate a breakfast or lunch program or is approved by the USDA's Food Nutrition Service to operate a breakfast or lunch program. For example, a school district or a county office of education may operate as a school food authority. In addition, certain entities, such as residential care facilities, may be approved by the USDA to operate a program.

Participation in the breakfast or lunch program requires the school food authority and the schools that participate in its programs to perform various administrative tasks. The school food authority must submit to Education an application for any school in which it desires to operate a breakfast or lunch program and a policy statement regarding free and reduced-price meals. The school food authority enters its initial or renewal application to participate in the breakfast or lunch program, and any annual updates to its application, into the Child Nutrition Information and Payment System (CNIPS) database of Education's Nutrition Services Division (nutrition services). The school food authority must include in its application information related to its food safety inspections, verification reports, and annual audits, as well as a site application

for each school it sponsors. The site application includes the name of the school, the requested meal program or programs, the site type, prior-year participation information, site enrollment, kitchen type, and meal pricing.

Once Education approves the school food authority's initial or renewal application, the local educational agencies must establish their eligibility criteria for free and reduced-price meals, based on Education's family-size income standards, for those schools under their jurisdiction that wish to submit site applications to participate in the breakfast and/or lunch programs. The local educational agencies must then seek Education's approval of their eligibility criteria. Local educational agencies include entities such as school districts and county offices of education. The local educational agencies must publicly announce their eligibility criteria for free and reduced-price meals at the beginning of each school year. In addition, each local educational agency must provide meal benefit forms to families so that they can apply to the agency for free or reduced-price meals for all children in their household. Further, the local educational agencies must select a sample of their approved household applications for free and reduced-price meals on file as of October 1 and verify the eligibility of the children listed.

The school food authority is required to ensure the local educational agencies' compliance with the nutritional program standards and the accuracy of their information. For example, prior to its submission of a monthly Claim for Reimbursement to Education, each school food authority must review the meal count data, which include the number of meals served by type (free, reduced price, or paid) for each school under its jurisdiction to ensure the accuracy of the claim. Each school submits this information to the school food authority, and the school food authority aggregates the data for its sites and enters it into the CNIPS database monthly.

Education's Role in Charter Schools

Although Education does not have the authority to approve a charter petition and act as a chartering entity, it has established a Charter Schools Division to serve as the focal point for the development and oversight of state regulations, policies, and procedures related to charter schools and to provide staff support to the state board in its role as a charter school authorizer. The Charter Schools Division had, as of June 30, 2010, 14 employees who, among other tasks, assist charter schools with fiscal and administrative issues. For example, the Charter Schools Division administers the Public Charter Schools Program, the

Charter School Facility Grant Program, and the Charter School Revolving Loan Program. The Public Charter Schools Program provides financial assistance for the planning, program design, and initial implementation of charter schools. The Charter School Facility Grant Program assists charter schools that meet specific eligibility criteria with their facilities rent and lease expenditures. The Charter School Revolving Loan Program provides start-up and initial capital in the form of low-interest loans of up to $250,000 to new charter schools.

In addition, Education's nutrition services, with 183 employees as of June 30, 2010, administers the USDA's child nutrition programs, including the breakfast and lunch programs and food distribution programs in California. Nutrition services also performs administrative reviews of schools participating in the breakfast and lunch programs, in accordance with federal regulations. In August 2008 nutrition services began using the Web-based CNIPS database to collect data from the school food authorities regarding their initial and renewal applications and any annual updates. In November 2008 the school food authorities began entering their monthly Claim for Reimbursement into the CNIPS database to obtain federal reimbursement for the number of meals served by each school under their jurisdiction.

Education's Use of the Consolidated Application Data System to Obtain Various Funding Information From Schools

According to the director of Education's Data Management Division (data division), since the 1980s, Education has been using its Consolidated Application for Funding Categorical Aid Programs, referred to as ConApp, to consolidate the multiple applications that local educational agencies submit to receive state and federal funding. Education funds that serve students in kindergarten through grade 12 are usually one of two types: general purpose or categorical. General-purpose funds can be spent on everything from teacher salaries to utility bills, while categorical funds are typically designated for a specific purpose,[3] such as the Title 1 Grants to Local Educational Agencies that benefit children who are failing, or are most at risk of failing, to meet the State's academic standards.

The ConApp is a two-part application that local educational agencies complete electronically using Education's Consolidated Application Data System (ConApp database). In June of each year,

[3] Assembly Bill 2 of the Fourth Extraordinary session of 2009 provides for what is commonly known as flexibility in the expenditure of most, but not all, categorical funds, if the school district meets certain conditions.

the local educational agencies submit Part I of the ConApp, which documents their participation in state and federal categorical programs and provides assurances that they will comply with the legal requirements of each program. In January of each year, the local educational agencies submit Part II of the ConApp, which contains their allocations and the number of participants in specified programs. The allocation amounts they receive for each program are determined by the laws creating the programs. Part II of the ConApp also has a page that is used to report the number of students ages five through 17 enrolled in the schools and the number of those students who are eligible for free or reduced-price meals based on the income criteria used in the breakfast and lunch programs.

Charter schools, like other public schools, can apply to receive state and federal funding, using the ConApp database. Direct-funded charter schools apply for and receive funding on their own behalf. In contrast, locally funded charter schools apply for and receive funding through their chartering entity, which can be a school district, a county board of education, or the state board.

Education's data division is responsible for managing the information local educational agencies and direct-funded charter schools submit through the ConApp database. The data division, which had 44 employees as of June 30, 2010, is also responsible for providing technical support to the local educational agencies, among other data collection and education projects.

Education's Collection of Data on Student Enrollment

Each year in October, Education collects data on student and staff demographics from the local educational agencies using its California Basic Educational Data System (CBEDS), which was first implemented in the 1980s. Specifically, Education uses two forms to collect data. The County/District Information Form collects data specific to school districts and county offices of education, including the number of classified staff, estimated number of teacher hires, and high school graduation requirements. The School Information Form collects data specific to schools, including the number of classified staff, enrollment in select educational options, education calendars, parental exception waivers, and bilingual paraprofessionals.

Student aggregate counts related to the number of graduates and dropouts, and various enrollment counts previously collected on the School Information Form, have been transitioned to the California Longitudinal Pupil Achievement Data System (CALPADS), beginning with the 2009–10 school year. Education began implementing

CALPADS in 2008 primarily to meet the reporting requirements of the federal No Child Left Behind Act of 2001. When fully implemented, CALPADS will be the new longitudinal data system Education will use to maintain data at the individual level, including student demographics, program participation, grade level, enrollment, course enrollment and completion, discipline, statewide assessments, and other data needed for state and federal reporting. In CALPADS, each student receives a Statewide Student Identifier, which is a unique number that is not personally identifiable, to track these data.

Scope and Methodology

The Joint Legislative Audit Committee (audit committee) requested that the Bureau of State Audits (bureau) conduct an audit of how the nutritional needs of charter school students are met, so that the Legislature can make future decisions regarding the health and education of California's children. Specifically, the audit committee asked us to determine, to the extent that data are available, the number of traditional public school students eligible for free and reduced-price meals compared to the number of charter school students eligible for such meals. Further, the bureau was asked to determine, to the extent possible, the number of charter school students currently participating in federal school nutrition programs, such as the breakfast and lunch programs.

The audit committee also requested that the bureau identify the charter schools that provide meals but do not participate in the federal nutrition programs and, for a sample of those schools, determine the types of alternative nutrition programs they offer and how they deliver the meals; the cost of meals to low-income students; whether the program meets or exceeds the nutritional standards that apply to traditional schools and, if not, what nutritional standards the program follows; and why the charter school selected the alternative nutrition program. Further, the audit committee asked the bureau to identify those charter schools that do not provide meals to their students and, for a sample of those schools, to determine how the schools accommodate the nutritional needs of low-income students and the reasons the schools cite for not providing meals, including any barriers that exist. Finally, the bureau was asked to survey key stakeholders regarding whether they believe charter schools are adequately providing nutrition to low-income students eligible for free or reduced-price meals.

To understand charter school governance, we reviewed the Act and other state laws. In addition, to understand the breakfast and lunch programs, we reviewed federal laws and regulations governing the programs. Finally, to understand Education's various

electronic databases, we interviewed its staff and reviewed relevant documentation such as procedure manuals and instructions given to the local educational agencies.

We attempted to rely on the various electronic databases when performing this audit. The U.S. Government Accountability Office (GAO), whose standards we follow, requires us to assess the sufficiency and appropriateness of the computer-processed data. To determine the number of traditional and charter schools and their students eligible for free and reduced-price meals, we obtained data from Education's ConApp database, which is a paperless system. Typically, we assess the reliability of paperless databases by reviewing the adequacy of system controls in place. However, Education lacks internal controls over the ConApp database. In addition, Education does not require all direct-funded charter schools to submit their information using the ConApp database. Thus, based on our testing and analysis, we determined that the data obtained from the ConApp database is not sufficiently reliable to reach an audit conclusion related to the number of traditional and charter schools and their students eligible for free and reduced-price meals. A further discussion of the issues identified with the ConApp database is provided in the Audit Results section of this report.

To identify the number of charter schools and their students currently participating in the breakfast or lunch program, we attempted to identify charter schools participating in these programs by obtaining information from Education's CNIPS database. We assessed the reliability of the CNIPS database by conducting data set verification procedures, performing electronic testing of key data elements, and performing completeness testing on the data. We could not conduct accuracy testing because nutrition services no longer updates their hard-copy documents. Therefore, we could not verify data in the system against source documents. Nutrition services performs administrative reviews to meet federal regulations related to the lunch program. However, its review does not include the data elements the bureau considers key to this analysis.

We identified no issues when performing data set verification procedures. However, we identified omissions in a key data field during our electronic logic testing. Specifically, we found that the county-district-school code data field was blank in 12.5 percent of the instances. Further, to test the completeness of the data, we haphazardly selected a sample of 29 charter schools identified as participating in the breakfast and lunch programs by obtaining their applications on file at nutrition services to ensure that they were included in the data we received. In all but one instance we were able to find the unique identifier associated

with a charter school. In that instance the school did not appear in the data because its application was pending the school food authority's verification for fiscal year 2009–10, which had not been completed by the date of the data we received. However, we were not able to verify the charter school name in three of 29 instances due to the lack of updated source documents. We also attempted to identify charter school students participating in the breakfast and lunch programs by obtaining information from Education's CNIPS database. However, Education does not require the school food authorities to report monthly claims for each of their sites separately. Therefore, although Education can report the total number of students, it cannot differentiate between charter school students and traditional students who are participating in these programs. Based on our testing and analysis, we determined that the CNIPS database is not sufficiently reliable to reach an audit conclusion related to the exact number of charter schools and their students currently participating in the breakfast and lunch programs. Further discussion of issues identified with the CNIPS database is provided in the Audit Results.

To identify the number of active charter schools in California, we obtained the Charter Schools Database from Education. We assessed the reliability of the Charter Schools Database by conducting data set verification procedures, performing electronic testing of key data elements, and performing completeness testing. We could not conduct accuracy testing. Although the Charter Schools Division retains the original source documentation in hard copy, any subsequent changes to the database are submitted by the schools through an annual information survey. The Charter Schools Division does not retain the hard-copy survey documents, with the exception of those for the years 2001 to 2003. Therefore, we could not test data in the system against source documents. Further, we ascertained that the Charter Schools Division does not conduct audits or perform reviews of the information stored in its database.

We identified no issues when performing data set verification procedures or electronic testing of key data elements. To further test the completeness of the data, we haphazardly selected a sample of 29 charter school applications obtained from the files at the Charter Schools Division to ensure that they were in the data we received. In all instances we were able to find the unique identifier associated with a charter school. However, we were not able to verify the charter school name in six of 29 instances due to the lack of updated source documents. Based on our testing and analysis, we determined the data obtained from the Charter Schools Database to be of undetermined reliability to reach an audit conclusion related to the number of active charter schools in California.

To identify charter schools that provide alternative nutrition programs to their students and those schools that do not provide meals to their students, we first had to determine the number of traditional and charter schools that were participating in the breakfast and lunch programs. Despite concerns regarding their data reliability, we used the Charter Schools Database and the CNIPS database that is designed to capture information on the number of schools and their students' participation in the breakfast and lunch programs to identify the number of active charter schools participating in the breakfast or lunch program. Using these data sources, we were able to reasonably determine that 213 charter schools were not participating in the breakfast or lunch program as of October 31, 2009. We then surveyed these 213 charter schools to identify those that provide alternative meals to their students and those that do not provide meals to their students. Appendix A presents the responses to this survey. Finally, we visited five schools that stated in their response to our survey that they provide an alternative meal program to their students to obtain a better understanding of their programs. The five schools we visited were the Children's Community Charter School in Paradise, Discovery Charter School in Tracy, Explorer Elementary Charter School in San Diego, International School of Monterey in Seaside, and Port of Los Angeles High School in San Pedro.

To survey key stakeholders, we first identified four key stakeholders through a discussion with Education's staff. We then conducted phone interviews with these stakeholders. Appendix B summarizes the mission of each stakeholder and the comments and opinions of their representatives.

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Audit Results

The California Department of Education Lacks Reliable Data to Identify the Number of Charter Schools and Their Students Eligible for and Participating in the Federal Breakfast and Lunch Programs

Several factors prevented us from using the data collected by the California Department of Education (Education) to determine the number of traditional and charter schools and their students eligible for free and reduced-price meals offered under the federal School Breakfast Program (breakfast program) and National School Lunch Program (lunch program). Specifically, Education lacks an internal control process, such as a systematic audit or review of supporting documentation, for the three data fields in its Consolidated Application Data System (ConApp database) that are relevant to our audit. These fields record the number of students enrolled in a school, the number of those students eligible to receive free meals, and the number of those students eligible to receive reduced-price meals. Furthermore, although Education requires local educational agencies receiving certain federal and state funding to complete its Consolidated Application for Funding Categorical Aid Programs (ConApp) by entering data into its ConApp database, it stated that it has no authority to require charter schools to do so. Therefore, the data in the ConApp database on the number of charter school students eligible for free and reduced-price meals may not reflect all of the charter schools in California.

We were also unable to use Education's data to determine the actual number of charter schools and their students participating in the breakfast and lunch programs. Specifically, the Child Nutrition Information and Payment System (CNIPS) database does not separately identify charter schools in its data. Instead, these data are combined with data for traditional schools under the same administrative jurisdiction. This practice makes it impossible to identify both the number of charter schools participating in the breakfast and lunch programs and the number of charter school students eligible for and participating in the programs.

Education's Data on the Number of Schools and Their Students' Eligibility for Free and Reduced-Price Meals Are Not Sufficiently Reliable

As we discussed in the Introduction, Part II of Education's ConApp obtains information from local educational agencies and direct-funded charter schools regarding the number of students eligible for free and reduced-price meals. Specifically, the page titled October 20XX School-Level Free and Reduced Price Meals Eligibility Data Collection has three data fields designed to capture the number of students enrolled at the school level, the

number of enrolled students who are eligible to receive free meals, and the number of enrolled students who are eligible to receive reduced-price meals. Education instructs the local educational agencies and direct-funded charter schools to include students between the ages of five and 17, to define eligibility as pertaining to students with a household income that meets the income eligibility criteria for receiving free or reduced-price meals in the breakfast or lunch program, and to capture the data on a preselected information day in October of each year. Education uses the information in these three data fields to determine eligibility and funding allocations for a variety of categorical programs, such as the Title I Grants to Local Educational Agencies that benefit children who are failing, or are most at risk of failing, to meet the State's academic standards.

Education's consolidated application database is a paperless system—certain charter schools enter the data directly into the database—yet, Education has not established controls to ensure the accuracy of the data.

Because the ConApp database is a paperless system, meaning the local educational agencies and direct-funded charter schools enter the data directly into the database, we expected Education to have an internal control process, such as a systematic audit or review of their supporting documentation, for the three data fields that are relevant to our audit. However, Education has not established an internal control process to ensure the accuracy of these three data fields. The director of the Data Management Division (data division) stated that it is not the responsibility of the data division to perform audits or reviews of the local educational agencies' and direct-funded charter schools' supporting documentation for the data they enter into the ConApp database. The director also stated that the users of the data are in a better position to determine if an audit or review is needed.

Because the data fields are used to determine eligibility and funding allocations for a variety of categorical programs, we contacted staff in Education's School Fiscal Services Division, Categorical Allocation and Audit Resolution Office (fiscal services division), which is responsible for, among other things, allocating funds to local educational agencies. An administrator in the fiscal services division stated that the ConApp database is currently the only database Education uses to collect information on the number of students eligible for free and reduced-price meals. The administrator also stated that the fiscal services division does not review the local educational agencies' and direct-funded charter schools' supporting documentation for the three data fields they enter into the ConApp database. The administrator further stated that Education requires the local educational agencies and direct-funded charter schools to certify that the data they submit are accurate and that it must place some confidence in their certifications. Finally, the administrator stated that local educational agencies and direct-funded charter schools are supposed to have documentation to support the information they enter into the

ConApp database. Nevertheless, although Education's ConApp database instructions require the local educational agencies and direct-funded charter schools to electronically certify that they have fulfilled the requirements listed on the page, the instructions do not state that they should retain the documentation.

Fiscal services division staff also stated that the page has built-in electronic error checks that do not allow the total number of students eligible for free and reduced-price meals to exceed the total enrollment. Although this is a reasonable edit check, this feature does not ensure that the numbers entered into the ConApp database by the local educational agencies and direct-funded charter schools are correct. In addition, fiscal services division staff stated that they compare the ConApp database enrollment figures for new and significantly expanding charter schools with Education's California Basic Educational Data System (CBEDS) enrollment figures to identify any large discrepancies. However, we found that a reconciliation between the total enrollment numbers in the ConApp database and the total enrollment numbers in CBEDS, for the purpose of obtaining some assurance of the accuracy of the total enrollment numbers reported by the local educational agencies and direct-funded charter schools in the ConApp database, was not possible for the 2009–10 school year because some of the local educational agencies had not certified their enrollment data by August 12, 2010, as Education requested.

An edit check Education uses, although reasonable, does not ensure that the numbers entered into the database by the local educational agencies and direct-funded charter schools are correct.

In 2008 Education began implementing its California Longitudinal Pupil Achievement Data System (CALPADS), primarily to fulfill the reporting requirements of the federal No Child Left Behind Act of 2001. The first phase of the CALPADS implementation included, among other things, the collection of 2009–10 school year enrollment numbers previously collected on the CBEDS School Information Form. However, a report on Education's implementation of CALPADS issued by its consultant in January 2010 found anomalies, errors, and defects throughout the system that were causing it to experience slowness, outages, and other performance issues.

The May revision to the Governor's Budget for fiscal year 2010–11 instructed Education to ensure at the minimum that by the end of the 2010 calendar year, CALPADS is able to receive and reliably transfer data. In a letter it sent to local educational agencies and charter schools on August 6, 2010, Education stated that, as of June 26, 2010, it was able to stabilize CALPADS. The letter also instructed the local educational agencies and charter schools to submit and certify their 2009–10 school year enrollment counts and 2008–09 graduate and dropout counts by August 12, 2010. According to the director of Education's data division, 1,290 out of 1,522 local educational agencies had certified their data as of September 13, 2010.

In addition to the concerns we have with the accuracy of the three data fields that are relevant to our audit, we question the completeness of the data for the purpose of our audit. Education requires local educational agencies applying for categorical aid program funds to submit their information into the ConApp database. However, according to an administrator in its data division, there is no state or federal law that gives Education the authority to require charter schools to submit the ConApp. Therefore, complete data on the number of charter schools and their students eligible for free and reduced-price meals may not be available. Our concerns with both the accuracy and completeness of the data in the three data fields prevent us from concluding that the data are sufficiently reliable to reach an audit conclusion related to the number of traditional and charter schools and their students eligible for free and reduced-price meals.

Education's Nutrition Services Division Is Unable to Accurately Identify Charter Schools Participating in the Breakfast and Lunch Programs

The Child Nutrition Information and Payment System (CNIPS) database administered by Education's Nutrition Services Division (nutrition services) did not identify all charter schools participating in the breakfast and lunch programs as of October 31, 2009. Consequently, the CNIPS database cannot be used to accurately identify all charter school students participating in the programs.

When applying to participate in the breakfast and lunch programs, a school food authority must complete an application for each of its school sites, and in doing so must indicate the type of site—such as a public school district, direct-funded charter school, or locally funded charter school. A direct-funded charter school may apply to participate in the breakfast and lunch programs as its own school food authority. In contrast, a locally funded charter school must apply to participate in the programs through its chartering entity and must be listed as a site on the application of an approved school food authority. In our comparison of Education's Charter Schools Database and its CNIPS database, we identified 115 direct and locally funded charter schools that were participating in the breakfast or lunch program, but were not identified as participating in these programs because the school food authorities had not identified them as charter schools in the CNIPS database. Nutrition services does not review the applications the school food authorities enter into CNIPS to ensure the accuracy of the information.

In comparing two of Education's databases, we identified 115 direct and locally funded charter schools that were participating in the breakfast or lunch program, but were not identified as charter schools participating in these programs in the CNIPS database.

Further, federal law allows sites to be combined for the purposes of participating in the breakfast and lunch programs if the programs are under the same administrative jurisdiction and are on the same campus. Consequently, it is impossible to determine whether

a particular charter school is participating in the breakfast and lunch programs, because it is part of a combined site. For example, Gompers Preparatory Academy in San Diego is participating in the lunch program as a combined site under Gompers Charter Middle School. Both of these charter schools are under the administrative jurisdiction of the San Diego Unified School District, and their programs are conducted on the same campus. Similarly, Marysville Charter Academy for the Arts, a charter school, and Marysville High School, a traditional high school, are both located on the same campus and are under the jurisdiction of Marysville Joint Unified School District. The school food authorities in these examples do not need to list these charter schools as separate school sites on their applications. Because federal law allows these sites to submit a single application to participate in the breakfast and lunch programs, it is impossible to identify how many charter schools are participating in the programs.

Due to the school food authorities' reporting errors and their ability to combine sites on the same campus, we found that the CNIPS database is not sufficiently reliable to determine the exact number of charter schools or their students participating in the breakfast and lunch programs. However, the database was the only source available to us to use to identify schools that provide alternative meal programs to their students as well as schools that do not provide any meals to their students. Therefore, using the Charter Schools Database and the CNIPS database, we determined that 213 charter schools did not appear to be participating in the breakfast or lunch program. To identify any additional reporting errors, we added a question on our survey asking the 213 charter schools to verify Education's information indicating that they were not participating in the breakfast or lunch program. Figure 1 on the following page presents the results for the 133 charter schools responding to our survey.

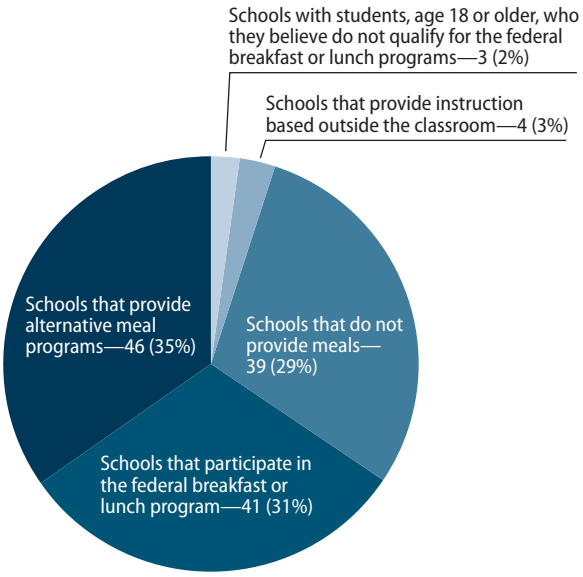
As the figure shows, four schools stated that they provide instruction based outside the classroom and therefore do not provide meals. In addition, three schools stated that they do not provide meals to students or participate in the breakfast and lunch programs because their students are age 18 or older. In fact, two of these schools stated that they provide services to students in jail. The third school stated that its students are between the ages of 18 and 25 and that the majority of its students are above the age to participate in the breakfast or lunch program. However, if the school's students meet the criteria shown in the text box, they may be able to participate in the breakfast and lunch programs.

Federal School Breakfast Program and National School Lunch Program Criteria for Students Up to Age 21

- Child can be enrolled in any public or nonprofit private residential child care institution including juvenile detention centers.
- Child can be enrolled in Job Corps centers funded by the U.S. Department of Labor.
- Child can be enrolled in private foster homes.

Source: Federal Regulations 7CFR 210.2 and 7CFR 220.2.

Figure 1
Surveyed Charter Schools' Responses About Their Participation in Alternative Meal Programs



Sources: Charter Schools' responses to the Bureau of State Audits' Nutritional Needs of Charter School Students survey.

Further, Figure 1 shows that although identified as not participating in the breakfast or lunch program in the CNIPS database, 41 of the 133 charter schools responding to our survey stated that they are in fact participating in the programs. Various reasons exist for this discrepancy. We found that 10 of the schools enrolled in the programs after October 2009 and thus were appropriately excluded from the October 31, 2009, list we generated using the CNIPS database. Eighteen of the schools shared a campus with another school and were reported as combined sites, which is allowable under federal law, as described previously.

Nutrition services requires the school food authorities to enter the county-district-school (CDS) codes for their public school district sites but not for other site types, such as the charter schools. The remaining discrepancies were related to errors in the CDS codes and the site type. Specifically, three charter schools had CDS codes in the CNIPS database that did not match the CDS codes in the Charter Schools Database, and eight charter schools had no CDS codes in the CNIPS database. Also, two charter schools participating in the breakfast and lunch programs were misidentified on the school food authorities' applications, one as a private school and one as a county office of education.

Nutrition services performs reviews of a sample of the schools under the jurisdiction of the school food authorities each year, in accordance with federal regulations, to ensure that the requirements of the lunch program are being met. However, nutrition services' review tool does not include a procedure for verifying the accuracy of the CDS code or the site type reflected on the schools' site applications. Nutrition services stated that it is the charter schools' responsibility to enter the CDS code into the CNIPS database but that there is no requirement for them to do so. The additional errors we identified through the survey further illustrate that the CNIPS database is not sufficiently reliable to determine the exact number of charter schools participating in the breakfast and lunch programs.

Education's CNIPS database is not sufficiently reliable to determine the exact number of charter schools participating in the breakfast and lunch programs.

Education's Nutrition Services Cannot Differentiate Between Charter School Students and Traditional School Students Participating in the Breakfast and Lunch Programs

The CNIPS database has data fields for school food authorities to enter information such as the number of students approved for free and reduced-price meals at each site under their jurisdiction. However, Education allows the school food authorities to combine the information for their sites before entering it into the CNIPS database. Thus, the CNIPS database cannot be used to identify the number of charter school students participating in the breakfast and lunch programs.

Each month the school food authorities must submit a Claim for Reimbursement to nutrition services using the CNIPS database. Education's claim reimbursement procedures require the school food authorities to enter a claim for each site under their jurisdiction as well as a consolidated claim. Both claim types are required to include information such as the number of students approved to receive free and reduced-price meals, total enrollment, and the number of free and reduced-price meals served during the month. In addition, prior to submitting the Claim for Reimbursement, school food authorities are required by federal regulations to review the meal count data for each site to ensure that the site claim accurately reports the number of free and reduced-price meals served to eligible students.

However, nutrition services does not require the school food authorities to report monthly claims for each of their sites separately. For example, the Natomas Pacific Pathways Preparatory Schools, which has a charter middle school and high school, participates in the breakfast and lunch programs through the Natomas Unified School District, which acts as a school food authority for both traditional schools and charter schools.

The Natomas Unified School District enters into the CNIPS database the combined number of charter school and traditional school students at all of its sites who are approved to receive free and reduced-price meals. Therefore, although Education can report the total number of students, it cannot differentiate between charter school students and traditional school students who are participating in the breakfast or lunch program. Nutrition services stated that it does not require the school food authorities to report the monthly claims for each of their sites because some of the larger school food authorities had expressed concern about the amount of manual data entry this reporting would require. Nutrition services also stated that the school food authorities may choose to report the monthly claims for each of their sites. Finally, nutrition services stated that, once it fully implements the CNIPS database in December 2010 and all of the school food authorities have the capability to upload site-level data into the CNIPS database, it will revisit requiring site-level reporting for all school food authorities.

Charter Schools Not Participating in the Federal Breakfast or Lunch Program Use Various Methods to Provide Meals to Their Students

Forty-six of the 133 charter schools that responded to our survey provide meals but do not participate in the breakfast or lunch program.

The Joint Legislative Audit Committee (audit committee) asked us to identify charter schools that provide meals but do not participate in the breakfast or lunch program and to gather data such as how they deliver the meals, why they chose that method, the cost of the meals to low-income students, and whether the program meets or exceeds the nutritional standards that apply to traditional schools. Forty-six of the 133 charter schools responding to our survey fall into this category. Charter schools establish their own procedures and guidelines when providing meals to students outside of the breakfast and lunch programs. The 46 charter schools have varying methods of providing meals, ranges of meal costs, and reasons for offering their alternative meal programs. In addition, the nutritional guidelines they follow vary. Table A.1 in Appendix A presents a summary of these charter schools' responses to our survey.

The 46 charter schools had various reasons for electing to provide meals without participating in the breakfast or lunch program. The primary reason cited by 15, or 33 percent, of the charter schools for having an alternative meal program is to allow them to provide what they described as fresher, healthier food choices to their students than the breakfast or lunch program provides. For example, All Tribes Charter School, located in Valley Center, partners with the local Indian Health Clinic to develop a diet plan that it believes is more appropriate for its students. Larchmont Charter School–West Hollywood, located in Los Angeles, stated that it is affiliated with the Chez Panisse Foundation's Edible Schoolyard program, which focuses on a comprehensive hot lunch

program that includes offering gardening and cooking classes to the students. The Golden Oak Montessori of Hayward Charter School, located in Hayward, wanted to offer its students organic foods without trans fats and sugar. Eight charter schools stated that they do not have enough staff and resources to fulfill the administrative requirements of the breakfast and lunch programs. Eight charter schools also indicated that they do not have a kitchen, a cafeteria, equipment, or other resources with which to prepare and deliver meals to their students. The remaining charter schools cited reasons such as having too few students eligible for free or reduced-price meals, having applications for the breakfast and lunch programs that were either pending approval or denied, or choosing to partner with another entity.

The five charter schools we visited cited reasons that were consistent with those of the other schools. The text box lists these five charter schools. Specifically, three of the five charter schools we visited wanted to provide fresher, healthier food choices to their students than the breakfast or lunch program provides. In addition, the International School of Monterey in Seaside and the Explorer Elementary Charter School (Explorer) in San Diego expressed concerns regarding the administrative requirements of the breakfast and lunch programs.

The Five Charter Schools With an Alternative Meal Program That We Visited

- Children's Community Charter School, located in Paradise
- Discovery Charter School, located in Tracy
- Explorer Elementary Charter School, located in San Diego
- International School of Monterey, located in Seaside
- Port of Los Angeles High School, located in San Pedro

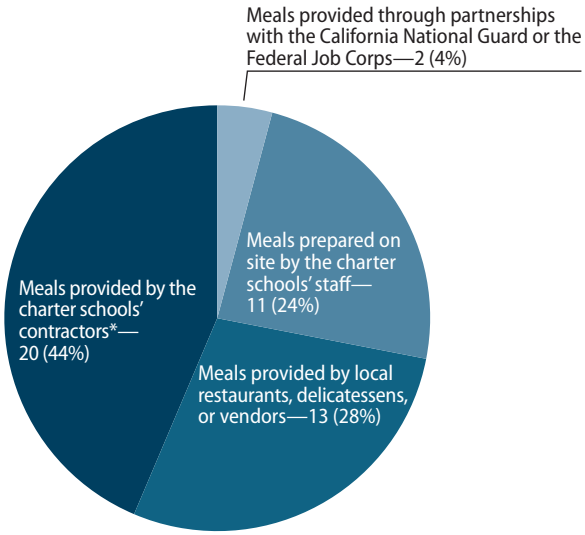
The 46 charter schools also cited various methods of providing meals to their students, including using school staff to prepare and serve meals on site; obtaining meals from local restaurants, delicatessens, or vendors; and contracting with food service management companies or local caterers. Figure 2 on the following page provides a breakdown of the delivery methods used by the 46 charter schools.

The five charter schools we visited had similar methods for delivering meals to their students. For example, Explorer contracts with a caterer to provide a hot lunch to its students each day of the week except Tuesday. The caterer prepares the food off site and then brings it to the school. The caterer and Explorer's parent volunteers serve the meal. On Tuesday, Explorer brings in pizza from a local restaurant. In contrast, Discovery Charter School (Discovery) in Tracy, prepares its food daily and puts it on a steam line in its kitchen so that its students can walk through the line to select their lunch.

The students who paid full price for their meals at the charter schools paid between 50 cents and $5. The students who paid for reduced-price meals paid between 40 cents and $1.88. Twenty-four of the 46 charter schools offered free meals either to all of their students or to those who qualify for free or reduced-price meals

under the breakfast or lunch program. Some charter schools stated that the free meals they provide to their students are paid for by either a Parents' Fund, a parent organization, or the school. For example, Northcoast Preparatory and Performing Arts and Academy, located in Arcata, stated that its low-income students pay either whatever they can afford or nothing, with its Parents' Fund paying the remaining cost for their meals. In addition, Discovery stated that its general fund pays the difference between the money it collects from students and its costs to operate the program.

Figure 2
Surveyed Charter Schools' Various Methods of Providing Meals to Students

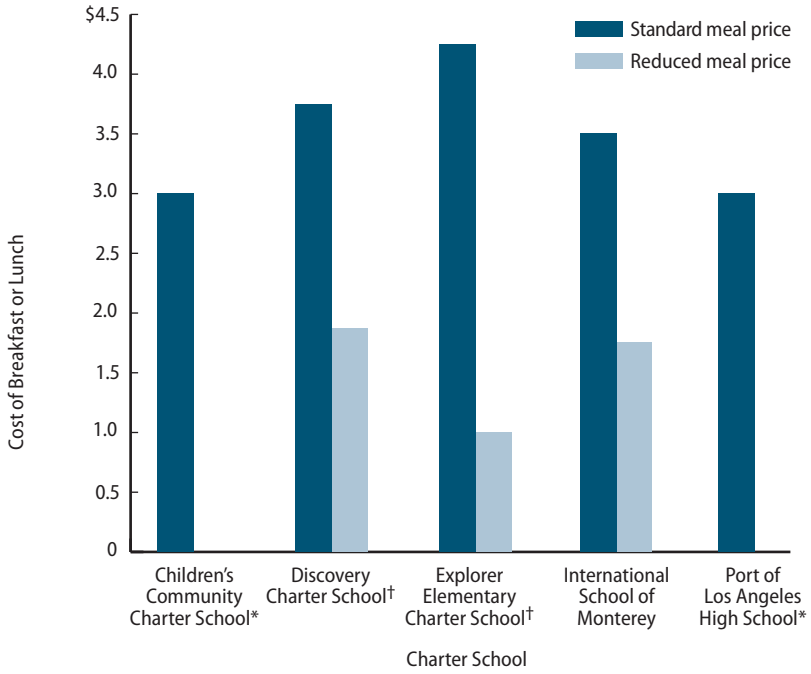


Sources: Charter Schools' responses to the Bureau of State Audits' Nutritional Needs of Charter School Students survey.

* The schools contracted with food service management companies, caterers, a school, and school districts.

The students at the five charter schools we visited paid between $3 and $4.25 for their meals. For example, Port of Los Angeles High School, in San Pedro, has an agreement with its primary vendor to provide lunch for its students at a price of $3. Port of Los Angeles High School does not offer free or reduced-price meals to its students. Explorer charged its students $4.25 for lunch. However, students who qualify for reduced-price meals paid $1, and there is no cost for those students who qualify for free lunch. Figure 3 shows the cost of the meals at the five schools we visited. The figure also indicates which schools offered free or reduced-price meals.

Figure 3
Amounts Students Paid for Meals at the Five Charter Schools We Visited



Sources: Charter Schools' responses to the Bureau of State Audits' Nutritional Needs of Charter School Students survey.

* The school does not offer free or reduced-price meals.

† The school also offers free meals to its eligible students.

As discussed in the Introduction, charter schools are exempt from the State's requirement of providing each needy student with one nutritionally adequate free or reduced-price meal during each school day. Thus, unless a charter school is participating in the breakfast or lunch program, it is not required to follow the nutritional guidelines of the U.S. Department of Agriculture (USDA). However, 13 of the 46 charter schools stated that they provide meals that meet or exceed the USDA's nutritional standards. In addition, 18 of the charter schools stated that their contractors provide nutritious meals. Another nine charter schools stated that they follow their own nutritional standards, work with a nutrition expert or health clinic, or allow the parents or vendor to select the meals. Finally, four charter schools did not address how they ensure that their students receive nutritious and well-balanced meals and two charter schools stated that their students bring lunch from home.

Three of the five charter schools we visited stated that either they or their vendor follow the USDA's nutritional guidelines or Interactive Food Guide Pyramid (food pyramid). The USDA's food pyramid

outlines five basic food groups: grains, vegetables, fruits, milk, and meat and beans. It also suggests the amount of food a person should eat from each group each day to stay healthy. However, we found variations in how closely the schools followed the USDA's guidance. For example, Discovery's director of food services (director) creates monthly menus and tries to ensure that each lunch has three or more of the daily food recommendations provided by the food pyramid. Although the menus include a daily salad bar, the director does not take into consideration the calories or fat content of the meals. However, when creating menus, the director does consider the likes and dislikes of the students. Discovery offers lunches that include hamburgers, grilled cheese sandwiches, and lasagna. In contrast, Explorer's lunch menu states that the caterer offers fresh, home-style meals, using organic products when possible, and that every lunch includes fresh fruits and vegetables, healthy carbohydrates, and lean protein. For example, the menu for the month of March 2010 offered students a chicken Caesar salad wrap, apples, and dessert on one day and home-style beef stew, garden salad, whole wheat bread, and fruit on another day. Finally, Children's Community Charter School, in Paradise, did not address how it ensures that its students receive nutritious well-balanced meals but stated that it selects the lunches it provides to its students based on the meals offered by its local vendors. Generally, the charter schools responding to our survey believe the nutritional needs of their students, including their low-income students, are being met.

Charter Schools Cited Various Reasons for Not Providing Meals to Their Students

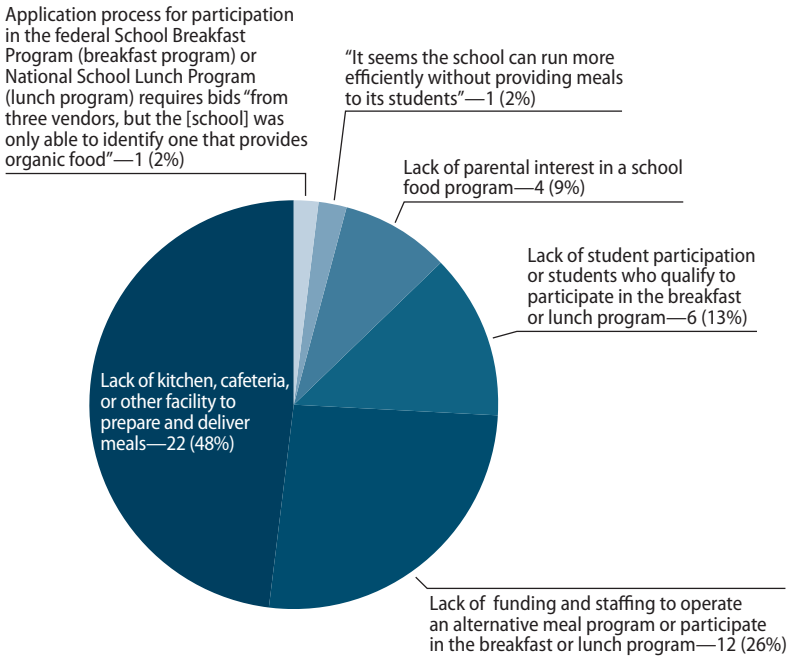
Of the 133 charter schools that responded to our survey, 39 do not provide meals to their students and are not required to do so.

The audit committee also asked us to identify charter schools that do not provide meals to their students and to gather data on how they accommodate the nutritional needs of low-income students and why they choose not to provide meals. Of the 133 charter schools responding to our survey, 39 indicated that they do not provide meals to their students. These charter schools gave a variety of reasons for not supplying meals to their students; however, many of the schools feel that the nutritional needs of their students are being met because most of their students bring lunch from home. Further, the charter schools stated that they make parents aware of the fact that they do not provide meals. Table A.2 in Appendix A presents a summary of the 39 charter schools' responses to our survey.

As we mentioned previously, charter schools are exempt from the State's requirement of providing each needy student with one nutritionally adequate free or reduced-price meal during each school day. The 39 charter schools that do not participate in the breakfast or lunch program or provide an alternative meal program cited a variety of reasons for not doing so. The most common

reason, cited by 22 of the 39 charter schools, was the lack of a kitchen, cafeteria, or other facility to prepare and deliver meals to their students. The next most common reason, cited by 12 of the 39 charter schools, was a lack of funding and staffing to operate an alternative meal program or participate in the breakfast or lunch program. Figure 4 shows the reasons charter schools cited for not providing meals to their students.

Figure 4
Reasons Given by Surveyed Charter Schools for Not Providing Meals to Their Students



Sources: Charter Schools' responses to the Bureau of State Audits' Nutritional Needs of Charter School Students survey.

Note: The total number of reasons the charter schools do not provide meals to their students does not agree with the total number of 39 schools responding to the survey because some schools did not provide a reason while others provided multiple reasons.

Of the 39 charter schools responding to our survey, 29 believe that, in general, the nutritional needs of their students, including their low-income students, are being met. Many of the 29 schools stated that their students bring lunch from home. Our review of the information some of these charter schools make available to parents found that they inform parents that they do not provide meals, using handbooks that can be found on their Web sites. For example, one school's handbook informs parents that students must bring a snack and lunch to school on the days they attend classes and that they should provide healthy, nutritious food and bottled water, as no

drinking fountains are available. In addition, the handbook states that there is no cafeteria on the school campus. Thus, when parents choose to pack their children's lunch and schools make parents aware of the fact that they do not provide meals, it ultimately becomes the parents' responsibility to ensure that their children's nutritional needs are met.

Provisions Exist That Are Intended to Reduce the Administrative Requirements of the Federal Breakfast and Lunch Programs

One reason charter schools responding to the survey cited for choosing not to participate in the breakfast or lunch program was that they do not have enough funding, staffing, or other resources to fulfill the administrative requirements of these programs. However, federal regulations include three provisions aimed at reducing administrative requirements such as meal counting and claim reimbursement associated with the programs.

As discussed in the Introduction, participating in the breakfast or lunch program requires the school food authorities and local educational agencies to perform various administrative tasks. For example, federal regulations require each local educational agency to provide meal benefit forms to families so that they can apply to the agency for free or reduced-price meals for all children in their household. In addition, local educational agencies must select a sample of their approved household applications for free and reduced-price meals on file as of October 1 and verify the eligibility of the children listed. Finally, before submitting a monthly Claim for Reimbursement to Education, each school food authority must review the lunch count data, which includes the number of meals served by type (free, reduced price, and paid) for each school under its jurisdiction to ensure the accuracy of the claim.

Some charter schools that do not participate in the breakfast or lunch program stated they do not have enough resources to fulfill the administrative requirements of these programs.

Eight charter schools providing alternative meal programs stated that they do not participate in the breakfast or lunch program because they do not have enough staff and resources to fulfill the administrative requirements of these programs. Specifically, one charter school stated that it has a small number of students who qualify for the lunch program and the amount of "man" hours needed to fulfill the requirements and paperwork makes its participation in the program economically unfeasible. The charter school also stated that it would be less expensive for it to absorb the expense of providing free and reduced-price lunches than to pay its personnel to oversee the program. Another charter school stated that the bureaucracy and staffing levels of the breakfast and lunch programs do not allow for a small school to participate. The charter school also stated that the programs do not cover all of the students who really need to participate and do not provide enough food to realistically meet the needs of its students. In addition, one of the 39 charter

schools that does not provide meals to its students stated that Education requires schools to submit three bids for food vendors with the applications for the programs, and it has been able to identify only one vendor that provides organic food.

Federal regulations outline three alternatives to the notification, certification, and claim reimbursement procedures that school food authorities and their schools must follow to receive federal reimbursement for the meals they serve. These alternatives are commonly referred to as Provision 1, Provision 2, and Provision 3. The Table presents these three provisions.

Table
Alternative Provisions to Reduce the Administrative Requirements of the Federal School Breakfast Program and the National School Lunch Program

PROVISION	DESCRIPTION
1	A school food authority of a school having at least 80 percent of its enrolled children determined eligible for free or reduced-price meals may, at its option, authorize the school to: • Publicly notify parents of enrolled children who receive free meals once every two consecutive school years instead of annually. • Reduce annual certification of children eligible for free meals to once every two consecutive school years. • Count the number of free, reduced-price, and paid meals served to children in their schools as the basis for monthly claim reimbursements.
2	A school food authority may certify children for free and reduced-price meals for up to four consecutive school years in schools that serve meals at no charge to all enrolled children. This provision establishes a base year, which is generally the last school year that public notifications to parents and eligibility determinations were made and meal counts by type were taken. The base year is the first year and is included in the four-year cycle. This provision requires that: • Schools serve reimbursable meals to all children at no charge. • School food authorities pay, with funds from nonfederal sources, the difference between the cost of serving breakfast and lunch at no charge to all children and the federal reimbursement. • Schools take daily meal counts of reimbursable student meals by type during the base year and convert the counts to percentages. The schools then use the percentages to calculate reimbursement claims in non-base school years. • School food authorities, during the base year, review the meal count data for each school under their jurisdiction to ensure the accuracy of the reimbursement claim. During non-base school years, they compare each school's total daily meal counts to the school's total enrollment, adjusted by an attendance factor. • School food authorities exclude the schools participating under this provision from their sample selection and verification of eligibility during non-base school years.
3	A school food authority of a school that serves all enrolled children reimbursable meals at no charge during any period for up to four school years may elect to receive federal cash reimbursement and commodity assistance at the same level as the total amounts it received during the last year that the eligibility determinations for free and reduced-price meals were made and meals were counted by type (generally referred to as the base year). The base year immediately precedes but is not included in the four-year cycle. This provision requires that: • Schools serve reimbursable meals to all children at no charge during non-base school years. • School food authorities pay, with funds from nonfederal sources, the difference between the cost of serving breakfast and lunch at no charge to all children and the federal reimbursement. • Schools take and retain daily meal counts of reimbursable meals they serve to children during the non-base school years. The school food authority establishes an oversight system using the daily meal counts to ensure that participation has not declined significantly from the base year. • The California Department of Education or the school food authorities make annual adjustments for enrollment and inflation to the total federal cash and commodity assistance received by the school in its base year. • School food authorities, during the base year, review the meal count data for each school under their jurisdiction to ensure the accuracy of the reimbursement claim. During non-base school years, school food authorities develop their own oversight system or compare each school's total daily meal counts to the school's total enrollment, adjusted by an attendance factor. • School food authorities exclude the schools participating under this provision from their sample selection and verification of eligibility during non-base school years.

Source: Federal Regulation 7CFR245.9.

These provisions have been in place for at least 15 years. Education informs school food authorities about the provisions through its management bulletins and information manuals on its Web site. In addition, Education stated that it provides information on the provisions to school food authorities during its annual training. Thus, opportunities may exist for charter schools to participate in the breakfast and lunch programs while reducing the administrative burdens of these programs.

Recommendations

To ensure the reliability of the ConApp database fields related to the number of students enrolled at the school level, the number of those enrolled students who are eligible to receive free meals, and the number of those students who are eligible to receive reduced-price meals, Education should do the following:

- Modify its ConApp database instructions to require local educational agencies and direct-funded charter schools to retain their documentation supporting the three data fields for a specified period of time.

- Establish an internal control process such as a systematic review of a sample of the local educational agencies' and direct-funded charter schools' supporting documentation.

To ensure the accuracy of the CNIPS database, Education should do the following:

- Direct the school food authorities to establish internal control procedures to ensure the accuracy of the application information they enter into the CNIPS database.

- Direct nutrition services to modify the tool used to review a sample of the school food authorities' schools to include a procedure for verifying the accuracy of the CDS code and site type reflected on the schools' applications.

To ensure that it maximizes the benefits from the State's investment in the CNIPS database, Education should do the following:

- Require the school food authorities to submit a monthly Claim for Reimbursement for each site under their jurisdiction in addition to their consolidated claims.

- Establish a timeline for the school food authorities to comply with the requirement.

We conducted this audit under the authority vested in the California State Auditor by Section 8543 et seq. of the California Government Code and according to generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives specified in the scope section of the report. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Respectfully submitted,

ELAINE M. HOWLE, CPA
State Auditor

Date:	October 21, 2010
Staff:	Joanne Quarles, CPA, Audit Principal Rosa Reyes Michelle J. Baur, CISA Ryan P. Coe, MBA Mike Henson Tina Kobler
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For questions regarding the contents of this report, please contact Margarita Fernández, Chief of Public Affairs, at 916.445.0255.

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Appendix A

CHARTER SCHOOLS' SURVEY RESPONSES

The Joint Legislative Audit Committee (audit committee) directed the Bureau of State Audits (bureau) to identify charter schools that provide meals but do not participate in the federal nutrition programs and, for a sample of those schools, determine the types of alternative nutrition programs they offer and how they deliver the meals; the cost of meals to low-income students; whether the program meets or exceeds the nutritional standards that apply to traditional schools and, if not, what nutritional standards the program follows; and why the charter school selected the alternative nutrition program. Further, the audit committee requested the bureau to identify those charter schools that do not provide meals to their students and, for a sample of those schools, determine how the schools accommodate the nutritional needs of low-income students and the reasons the schools cite for not providing meals, including any barriers that exist.

The Child Nutrition Information and Payment System (CNIPS) database used by the Nutrition Services Division of the California Department of Education (Education) did not include all charter schools, directly and locally funded, participating in the federal School Breakfast Program (breakfast program) or the National School Lunch Program (lunch program). We also found that the school food authorities do not always correctly identify on their applications the type of school sites, such as public school district, direct-funded charter school, or locally funded charter school, participating in the breakfast and lunch programs. In addition, we identified various data entry reporting errors by the school food authorities. As a result, we found that the CNIPS database is not sufficiently reliable to determine the exact number of charter schools and their students participating in the breakfast and lunch programs.

Although the Charter Schools Division retains the original source documentation it uses for the Charter Schools Database in hard copy, any subsequent changes to the database are submitted by the schools through an annual information survey. The Charter Schools Division does not retain the hard-copy survey documents, with the exception of those for the years 2001 to 2003. Therefore, we could not test data in the system against source documents. Further, we ascertained that the Charter Schools Division does not conduct audits or perform reviews of the information stored in its database. We haphazardly selected a sample of 29 charter school applications obtained from the files at the Charter Schools Division to ensure that they were in the data we received. In all instances we were able to find the unique identifier associated with a charter school.

However, we were not able to verify the charter school name in six of 29 instances due to the lack of updated source documents. Based on our testing and analysis, we determined the data obtained from the Charter Schools Database to be of undetermined reliability to reach an audit conclusion related to the number of active charter schools in California.

Nevertheless, because they were the only databases available for the purpose of our audit, we used the CNIPS database and the Charter Schools Database for our review. Using these sources, we were able to determine that of the 815 active charter schools identified as of April 2010, 451 were participating in the breakfast or lunch program and 151 provide instruction based outside the classroom to their students, either online or independently. We surveyed the remaining 213 charter schools to identify schools that provide an alternative meal program and schools that do not provide meals to their students, and we received responses from 133 charter schools. Forty-six of the charter schools responding stated that they offer their students an alternative meal program. Table A.1 provides a summary of their responses, including a description of the meal program, the prices for meals, how the charter schools ensure that nutritional standards are met, the reason for choosing an alternative nutrition program, and whether they believe the nutritional needs of low-income students are being met.

In addition, 39 of the 133 charter schools responding stated that they do not provide meals to their students. Table A.2 beginning on page 46 provides a summary of their responses, including how the charter school accommodates the nutritional needs of low-income students, the reason why the charter school does not provide meals, and whether they believe the nutritional needs of low-income students are being met.

Table A.1
Survey Responses From Charter Schools That Have Alternative Meal Programs

CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Alameda	Nea Community Learning Center	In school year 2009–10, the school contracted with Revolution Foods, Inc. to deliver lunch. In school year 2010–11, the school will contract with Lunchmaster.	The school did not provide the price Revolution Foods, Inc. charges for its meals.	Revolution Foods, Inc. ensures that the U.S. Department of Agriculture's (USDA) nutritional standards are met.	The National Student Lunch Program (lunch program) application process is a "nightmare."	No. Very few kids purchase the school's lunch, which is why the school is changing lunch programs.
Arcata	Northcoast Preparatory and Performing Arts Academy	Lunch is prepared and delivered on site by school staff.	Lunch is $4 per day if the parent pays a month in advance or $5 if paid daily. Low-income students pay either nothing or whatever they can afford. The school's Parents' Fund pays the rest.	The school serves local, organic produce and the school's nutritional standards "exceed" the USDA's standards.	The school serves vegetarian, organic food. The school also provides vegan and gluten-free lunches for students who need these alternatives.	Yes. Any student in need is given lunch for no charge or whatever they can pay.
Castaic	Santa Clarita Valley International	In school year 2009–10, the school contracted with Royal Dining Catering, Inc. to deliver lunch. In school year 2010–11, the school will contract with Revolution Foods, Inc.	Lunch is $3.50 per day. The school does not offer free or reduced-price meals. However, if a student does not have lunch, the school will provide a snack.	The school's contractor follows the USDA's nutritional guidelines and focuses mostly on organic foods and often has a vegetarian choice.	The school 's alternative meal program is easier to implement. The school also has very few low-income students.	Yes. The school has very few low-income students. Most of the school's students prefer to bring a lunch from home. The school offers food to all students who forget to bring lunch. Further, if a family needs help, the school community steps up to help.
El Cajon	Liberty Charter School	The school contracts with Revolution Foods, Inc. to deliver lunch.	Lunch is $4.75 per day. The school does not offer free or reduced-price meals.	Revolution Foods, Inc. "adheres to all" lunch program and nutrition guidelines.	The options for students were "pitiful". The school sought a program that provides "real food" for its students.	Yes. Lunches are available to all students. In school year 2010–11, the school will be offering reduced-price and free meal options.
El Cajon	Literacy First Charter School	The school contracts with Revolution Foods, Inc. to deliver lunch.	Lunch is $3.50 per day. The school does not offer free or reduced-price meals.	Revolution Foods, Inc. "adheres to all" lunch program and nutrition guidelines.	The options for students were"pitiful". The school sought a program that provides "real food" for its students.	Yes. Lunches are available to all students. In school year 2010–11, the school will be offering reduced-price and free meal options.

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CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Escondido	Escondido Charter High School	Breakfast and lunch are prepared and delivered by a vendor that leases space from the school.	Breakfast and lunch prices range between $1 and $3.50, with the majority of the lunches priced around $1.50. The school does not have a provision in place for students who qualify for free or reduced-price meals.	The school did not address how it ensures that its students receive nutritious and well-balanced meals. "The school is not in the lunch business but the education business." The school believes that this is the parent's responsibility.	"Food is distributed more efficiently through the vendor because he is running a business, and wasted food is wasted profit. By delegating all of the responsibility to the vendor there is less waste, no extra staffing needs for the school, no dealing with health inspections, and the school gets a percentage of the money from the vendor, which goes back to the education of the students."	Yes. The executive director is not aware of any students who have gone hungry or without food when needed. The school encourages parents to take responsibility for their children's nutritional needs.
Escondido	Heritage K–8 Charter School	Breakfast and lunch are prepared and delivered by a vendor that leases space from the school.	Breakfast and lunch prices range between $1.00 and $3.50, with the majority of the lunches priced around $1.50. The school does not have a provision in place for students who qualify for free or reduced-price meals.	The school did not address how it ensures that its students receive nutritious and well-balanced meals. "The school is not in the lunch business but the education business." The school believes that this is the parent's responsibility.	"Food is distributed more efficiently through the vendor because he is running a business, and wasted food is wasted profit. By delegating all of the responsibility to the vendor there is less waste, no extra staffing needs for the school, no dealing with health inspections, and the school gets a percentage of the money from the vendor, which goes back to the education of the students."	Yes. The executive director is not aware of any students who have gone hungry or without food when needed. The school encourages parents to take responsibility for their children's nutritional needs.
Forest Ranch	Forest Ranch Charter School	The school's Parent-Teacher Partnership provides its students with a hot lunch from a local restaurant one day a week.	Lunch is $3.50. The school does not offer free or reduced-price meals to its students.	Due to the minimal offering, the school has not formalized its nutritional standards. The school does try to offer fresh, healthy choices.	The school is a new charter school and has limited personnel and funding. The paperwork for the federal and state meal programs is too "burdensome." The school is exploring its options such as participating in the Farm to School program.	Yes. The school ensures that all students have food and provides an alternative if they do not. The school has less than 100 students, so it is easy to monitor.
Fresno	Big Picture High School—Fresno	The school contracts with Royal Dining Catering, Inc. to deliver breakfast and lunch.	Students are currently not being charged for meals, and 78.5 percent of the school's students qualify for free and reduced-price meals.	By working with Royal Dining Catering, Inc. the school ensures that all of its students receive nutritious, well-balanced meals.	The school has submitted applications to participate in the federal School Breakfast Program (breakfast program) and lunch program several times, but has not been approved. In the meantime, the school offers the meals at its own expense.	Yes, because the meals are provided by a well-recognized food service management company.

CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Fresno	Fresno Academy for Civic and Entrepreneurial Leadership	The school contracts with Royal Dining Catering, Inc. to deliver lunch.	Lunch is $3 per day. The school offers lunch at a reduced price of 40 cents per day or free to those students who qualify.	Royal Dining Catering, Inc. follows lunch program's guidelines.	The school's application for participation in the lunch program is pending.	Yes. The school's contractor currently follows the lunch program's nutrition standards.
Grass Valley	Sierra Montessori Academy	The school obtains the entree from Café Sierra and prepares other items to make up the necessary components for the USDA's Traditional Food-Based Menu Planning Approach—Meal Pattern for Lunches.	Lunch is $2.50 per day. However, students purchase juice or water for an additional 50 cents. Students are fed regardless of ability to pay if they come to school without lunch.	The school follows the USDA's nutritional standards. The school ensures that the meals provided by Café Sierra meet the nutritional standards published by the USDA.	The school cannot afford to put in the required storage equipment for minimum delivery.	No. If the school could participate in the lunch program, its students would be fed every day.
Hayward	Golden Oak Montessori of Hayward Charter School	The school contracts with Revolution Foods, Inc. to deliver lunch.	Lunch is $3.25 per day. The school does not have a provision in place for students who qualify for free or reduced-price meals.	Revolution Foods, Inc. has the "highest" nutritional standards. In addition, the school planted a garden of edible fruits and vegetables and provides them as snacks to the students.	To offer organic foods without trans fats and sugar to its students. In addition, the school does not have an operational kitchen and a cafeteria.	No. This is the first year of operation for the school and it will take time to change the eating habits of the families. The school is partnering with Kaiser Permanente to educate the families on healthy eating habits.
Hesperia	Crosswalk High School	The school serves meals once a week. It serves pizza on Thursdays. The school picks up all the food from local restaurants right before lunch each day, stores it in a Styrofoam container, and serves it immediately.	Lunch is $1 for a slice of pizza. The school does not have a provision in place for students who qualify for free or reduced-price meals.	The students bring lunch from home. The school encourages its students to pack fruit and bring healthy snacks. The school also does not allow its students to bring sodas on campus.	The school was making food for students every day, but the health department "forced" them to stop in May 2009 because it did not have a commercial kitchen. The school has applied to participate in the lunch program for fiscal year 2010–11.	No. The nutritional needs of its students are not being met. The school has applied to participate in the lunch program for fiscal year 2010–11.
Hesperia	Pathways to College	The school serves meals twice a week. It serves tacos on Tuesdays and pizza on Thursdays. The school picks up all the food from local restaurants right before lunch each day, stores it in a Styrofoam container, and serves it immediately. In addition, students can purchase food from the Snack Shack.	Lunch is 59 cents for a taco and $1 for a slice of pizza. The Snack Shack prices range between 50 cents and $1. The school does not have a provision in place for students who qualify for free or reduced-price meals.	Most students bring lunch from home. If students forget their lunch, they can buy chips from the school. If the student does not have money, the school will give him or her the chips for free.	The school was making food for students every day, but the health department "forced" them to stop in May 2009 because it did not have a commercial kitchen. The school has applied to participate in the lunch program for fiscal year 2010–11.	No. The nutritional needs of its students are not being met. The school has applied to participate in the lunch program for fiscal year 2010–11.

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CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Livermore	Livermore Valley Charter School	In school year 2009–10, the school contracted with Children's Choice to deliver lunch. In school year 2010–11, the school will contract with Lunchmaster.	Lunch is approximately $4 per day; however, parents can order larger meal portions for $5 per day. The school does not offer reduced-price lunch but does offer free meals to those students who qualify.	Children's Choice's lunch menus were developed under the guidance of its on-staff registered dietitian and are "approved" by the lunch program.	The school does not have an on-site kitchen.	Yes. Students either bring a lunch from home or their parents purchase their lunch online from the contractor.
Los Angeles	Crenshaw Arts/ Tech Charter High School	The school has a contract with Audubon Middle School to receive meals for their students through the Los Angeles Unified School District.	Students do not pay for meals.	The Audubon Middle School follows all nutritional standards published by the USDA.	The school provides lunch to its students through Audubon Middle School.	Yes. The school provides free lunches to all 230 of its enrolled students.
Los Angeles	Larchmont Charter School—West Hollywood	The school contracts with The Farmer's Kitchen to deliver lunch.	Lunch is $5 per day. The school offers lunch at a reduced price of $1 or free to those students who qualify.	The school's lunch coordinator and The Farmer's Kitchen ensure that every menu "meets or exceeds" the USDA's nutritional standards.	The school is affiliated with the Chez Panisse Foundation's Edible Schoolyard program, which focuses on a comprehensive hot lunch program that includes offering gardening and cooking classes to the students.	Yes. The school serves every student and its meals are priced appropriately for all families to participate. In addition, meals are locally grown, organic, seasonal, and consistent with the ecoliteracy concepts that the school is teaching the students.
Los Angeles	Legacy Charter High School	Prior to March 2010, lunch was prepared and delivered on site by school staff. After March 2010, the school contracted with Royal Dining Catering, Inc. to deliver breakfast and lunch.	Prior to March 2010, students did not pay for meals. The school did not provide the price Royal Dining Catering, Inc. charges for its meals.	Prior to March 2010, the school did not directly follow any nutritional guidelines; however, it mirrored the state-approved meal plan of another school. The school did not comment on the nutritional value of meals served after March 2010.	The self-administered plan became too expensive for the school to run using its general fund because its population grew. The school then contracted with Royal Dining, Inc. to provide meals. The school has applied to participate in the lunch program.	Yes. Students' nutritional needs are being met. Every student eats lunch, and 85 percent of the lunches are meeting nutritional needs. The remaining lunches are less healthy options like pizza or nachos for a special event.
Marina del Rey	Goethe International Charter School	The school contracts with Revolutions Food, Inc. to deliver lunch.	Lunch is $3.50 per day. Students who qualify for reduced-price lunch pay only 40 cents.	By working with Revolution Foods, Inc. the school ensures that all of its students receive nutritious, well-balanced meals.	Due to "parent demands," the school chose to use an alternative program to provide students with a "more whole, organic, fresh meal."	Yes. Whether students are paying full price or receiving the meal for free or at a reduced price, the school ensures that each child receives a nutritious, well-balanced meal daily.
Morgan Hill	Charter School of Morgan Hill	The school contracts with Revolution Foods, Inc. to deliver lunch.	Lunch is $3.60 per day for kindergarten through 6th grade students and $3.85 per day for 7th and 8th grade students. The school offers lunch at a reduced price of 40 cents per day or free to those students who qualify.	Revolution Foods, Inc. provides meals that are in accordance with the USDA's nutritional standards. In addition, the school has a nutrition policy that "meets or exceeds" the USDA's nutritional standards.	The school has a small number of students who qualify for free and reduced-price meals. The lunch program requirements and paperwork make the program "unfeasible." It is less expensive for the school to absorb the cost than to pay personnel to oversee the program.	Yes. All students who qualify for free and reduced-price lunch have the opportunity to participate in the school's hot lunch program.

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Oakland	Civicorps Corpsmember Academy	The school provides fruit, vegetables, and a sandwich to its students.	Students do not pay for meals.	The school follows its basic guideline of providing plenty of fresh fruits and vegetables on a daily basis.	The school "does not qualify" for the lunch program because its students are between the ages of 18 and 24.	Yes. Fresh sandwiches with fruits and vegetables are "probably more nutritious than the prepackaged meals students purchase elsewhere."
Orangevale	Pacific Technology School	The school contracts with Revolution Foods, Inc. to deliver lunch.	Lunch is $3.50 per day. The school offers lunch at a reduced price of $1.20 or free to those students who qualify.	Revolution Foods, Inc. follows the traditional nutritional standards outlined in the lunch program.	The school was not able to establish itself with the lunch program in time.	Yes. Although the school is not part of the lunch program, the school uses lunch program guidelines in providing lunch to students who qualify for free and reduced-price lunches.
Paradise	Achieve Charter School of Paradise, Inc.	The school contracts with its local school district, Paradise Unified School District, to deliver lunch.	Lunch is $2.75 per day. The school does not have a provision in place for students who qualify for free or reduced-price meals. However, if students do not have lunch, the school will cover the full cost of the lunch.	The school buys prepared meals from its local school district.	The school is not currently part of the lunch program.	No. The school would "love "to provide free and reduced-price meals to those families that need it, but it is "at the mercy" of its school district that charges its students a higher price than other schools in the district.
Paradise	Children's Community Charter School	The school contracts with local vendors to deliver lunch. In addition, students can purchase food from the Snack Shack.	Lunch is $3 per day. The Snack Shack prices range between 25 cents and $1.50. The school does not have a provision in place for students who qualify for free or reduced-price meals.	The school did not address how it ensures that its students receive nutritious and well-balanced meals. The school's meals are based on the availability of local vendors. The school is exploring healthier options for its Snack Shack.	The school does not have an on-site cafeteria.	Yes. The school's food offerings vary enough in cost that all students are able to eat a balanced meal.
Paradise	Paradise Charter Middle School	The school contracts with local vendors to deliver lunch once a week. In addition, students can purchase food from the Snack Shed.	Lunch is $3.25. The Snack Shed prices range between 50 cents and $2. The school does not have a provision in place for students who qualify for free or reduced-price meals.	The school did not address how it ensures that its students receive nutritious and well-balanced meals. If a staff member notices that a student did not bring a lunch, the school will provide the student with food from the Snack Shed free of charge.	The school is small, with a low number of students.	No. The principal does not believe the nutritional needs of low-income students are being met. The principal also does not believe the majority of middle school kids receive healthy nutrition, usually based on their own choices of what they do and do not eat.
San Diego	Explorer Elementary Charter School	The school contracts with Banyan Catering to deliver lunch. In addition, the school provides lunch one day a week from a local restaurant.	Lunch is $4.25 per day. A local restaurant provides pizza and carrots with dressing on Tuesdays. The average cost of pizza per slice is $1.87. The school offers lunch at a reduced price of $1 or free to those students who qualify.	The school's caterer specializes in serving only healthy choices. The school's caterer "meets or exceeds" the USDA's nutritional standards.	To offer "healthier options" to its students. In addition, the school has too few students who qualify for free or reduced-price meals to justify the administrative requirements of the federal programs. The school is small with a low number of students.	Yes. The school provides healthy lunch options for all children. The school plans to participate in the lunch program in school year 2010–11.

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CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
San Diego	Innovations Academy Charter School	The school contracts with a local delicatessen to provide lunch.	Lunch ranges between $3.50 and $4.50 per day, with the majority of the lunches priced at $3.75. The school does not offer free or reduced-price meals to its students.	The school follows the USDA's nutritional standards. The school provides students a vegetable or fruit choice along with their main meal and they can also choose from water, milk, or juice.	The district's program is "unhealthy" because it uses a lot of processed foods and unnatural additives.	Yes. If students are not purchasing the school's lunches, it educates families on how to make an affordable and healthy lunch at home. The school stated that, generally, its students eat well.
San Francisco	Life Learning Academy	The school operates an on-site food service program that provides multiple meals daily, including breakfast and lunch. Meals are prepared as a component of the school's culinary arts training program.	All meals are provided at no cost to students, and 80 percent of the school's students qualify for free and reduced-price meals.	All meals "meet or exceed" nutritional standards published by USDA and follow the guidelines of its Interactive Food Guide Pyramid.	The "bureaucracy" and staffing levels required to participate in the federal programs "do not allow" for a small school to participate, and the programs "do not provide enough food" to realistically meet the needs of the school's students.	Yes. The school's on-site food service program meets or exceeds all nutritional requirements for participation in both the federal breakfast and lunch programs.
San Jose	Discovery Charter School	The school contracts with the Pasta Market, a local restaurant, to deliver lunch.	Lunch is $4.25 per day. The school provides free lunch to those students who qualify for free or reduced-price meals.	The school's charter follows the USDA's nutritional standards.	The school does not have enough qualifying students to participate in a state program.	Yes. The school provides healthy meals to all students. Even those who qualify for only a reduced-price lunch receive free lunch daily.
San Luis Obispo	Bellevue–Santa Fe Charter School	The school's lunch program is managed entirely by parent volunteers. Lunch is ordered from participating restaurants and delivered by parent volunteers.	Lunch prices range between $1.75 and $4.50. The school stated that it has scholarships available for low-income students.	The menu for the lunch program is established by a parent volunteer.	The lunch program is available in order to provide healthy, nutritious lunches for students.	Yes.
San Luis Obispo	Grizzly Challenge Charter School	The school operates in partnership with the California National Guard, which provides meals to the students.	Students do not pay for meals.	The California National Guard contracts with a professional food service contractor from a local community college.	Meals are required for this residential program.	Yes. All students have equal access to all meals.
San Pedro	Port of Los Angeles High School	Lunch is provided and delivered by two local vendors.	Lunch is $3 per day when purchased from the primary vendor. The second vendor provides pizza on Tuesdays at $2.50 per slice. Currently, the school does not have a provision in place for students who qualify for free or reduced-price meals.	The school does not have any provisions in place to ensure that its low-income students receive nutritious and well-balanced meals. However, the school stated that its primary vendor follows the USDA's nutritional standards when preparing meals.	The school chose its alternative meal program because it lacks the facility space and resources to store, prepare, and deliver meals to its students.	No. Some students are not receiving the best nutrition. The school plans to purchase the building it currently leases and build an annex, which will include a kitchen and cafeteria. Then the school plans to participate in the breakfast and lunch program.

CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Santa Ana	Orange County High School of the Arts	The school contracts with Alegre Foods, Inc. to deliver lunch.	Lunch prices range between 50 cents and $2. The school provides free lunch to those students who qualify for free or reduced-price meals.	The school provides meals from Alegre Foods, Inc. Each meal is a combination of "appropriate" items including fruits, vegetables, and a beverage.	The school has a small number of students eligible for the lunch program, and the time to complete necessary paperwork for reimbursement make an in-house system more manageable.	Yes. The nutritional needs are being met for all students, including those students who qualify for free and reduced-price lunch.
Santa Cruz	Cypress Charter High School	For students who were previously participating in the lunch program, the school pays for them to continue to receive meals from its chartering district. All other students bring their lunch, go off campus, or purchase a snack item from the school.	For students who were previously participating in the lunch program, the school pays $2.25 for their lunch using its school budget. The school does not offer lunch to its other students.	The school follows the policies and procedures established by its chartering district, which is Live Oak Elementary. The district participates in the breakfast and lunch programs.	"Technically," the school is not offering an alternative meal program; it follows its chartering district guidelines.	Yes.
Santa Rosa	Kid Street Learning Center Charter School	Breakfast and lunch are prepared and delivered on site by school staff.	Students do not pay for meals.	The school follows the USDA's nutritional standards.	To provide "fresher" foods and vegetables and to address the students' health issues.	Yes. A large majority of the school's students have health issues, which require restricted diets.
Santa Ynez	Santa Ynez Valley Charter School	Lunch is prepared and delivered on site by school staff. The school has its own kitchen and chef.	Lunch is $3.50 per day. However, students can purchase an extra entrée or a slice of pizza for $1.50. The schools' Parent Teacher Student Organization (PTSO) purchases the lunch for students who qualify for free or reduced-price lunches.	The school offers fresh seasonal fruit and vegetables, protein, and grain daily. It also offers dairy twice a week.	The school will be following the lunch program's guidelines next school year.	Yes. The school's PTSO purchases the lunch for students who qualify for free or reduced-price lunches. All students are fed the same thing.
Seaside	International School of Monterey	Lunch is prepared and delivered on site by school staff.	Lunch is $3.50 per day. The school offers lunch at a reduced price of $1.75 to those students who qualify.	The school's menu options were initially reviewed with a local nutrition expert.	The school wanted to improve the quality of food it serves to students. In addition, the paperwork associated with the federal programs was labor intensive and challenging due to the school's lack of staffing.	Yes. In general, the nutritional needs of low-income students are being met. Students who participate in the program are given a healthy, balanced lunch every day and are given their meals at a reduced fee to ensure their ability to participate if they are interested. The school also encourages families to pack healthy lunches.
Termo	Ravendale-Termo Charter School	Breakfast and lunch are prepared and delivered on site by the school's food service employees.	Breakfast and lunch are $2.50 per day. The school offers lunch at a reduced price of $1.25 or free to those students who qualify.	The school follows USDA's nutritional standards as closely as it can.	The school "cannot afford" to hire people to do the required paperwork for the federal programs and follow all rules and regulations.	Yes.

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CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Tracy	Discovery Charter School	Breakfast and lunch are prepared and delivered on site by the Tracy Learning Center Café staff.	Breakfast prices range between $1 and $3 per day. Lunch is $3.75 per day. The school offers lunch at a reduced price of half off the menu price or free to those students who qualify. The school pays for the free meals using its general fund.	The school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.	To offer a "fresher and better" choice to students.	Yes. The school serves its low-income students the same lunch as students who pay full price, and the school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.
Tracy	Millennium Charter School	Breakfast and lunch are prepared and delivered on site by the Tracy Learning Center Café staff.	Breakfast prices range between $1 and $3 per day. Lunch prices range between 50 cents and $3.50. Students who qualify for free and reduced-price meals receive the same lunch served to the Discovery Charter School students.	The school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.	To offer a "fresher and better" choice to students.	Yes. The school serves its low-income students the same lunch as students who pay full price, and the school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.
Tracy	Primary Charter School	Breakfast and lunch are prepared and delivered on site by the Tracy Learning Center Café staff.	Breakfast prices range between $1 and $3 per day. Lunch is $2.50 per day for kindergarten through 3rd grade students and $3 per day for 4th grade students. The school offers lunch at a reduced price of half off the menu price or free to those students who qualify.	The school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.	To offer a "fresher and better" choice to students.	Yes. The school serves its low-income students the same lunch as students who pay full price, and the school offers 3 or more of the daily food recommendations included in the USDA's approved Interactive Food Guide Pyramid.
Valley Center	All Tribes Charter School	Breakfast and lunch are prepared and delivered on site by school staff.	Breakfast is $2 per day and lunch is $3 per day. The school provides free lunch to 70 percent of its students.	The school partners with the local Indian Health Clinic to develop a more appropriate diet plan for its students.	To respond to the health issues of the school's students.	Yes. The special issues of the school's students, regarding their health, are being met "much better" than before.
Van Nuys	Birmingham Community Charter High	The school contracts with Sodexo, Inc. to prepare and deliver breakfast and lunch on site.	The school stated that it follows the same pricing structure as a nearby school, but it did not provide the price it charges for breakfast and lunch. The school also stated that it offers reduced-price or free meals to its students who qualify.	Sodexo, Inc. prepares the meals, and it follows the USDA's nutritional standards.	The USDA and CDE [California Department of Education] "refuse to accept" the school's application for reimbursement.	Yes. The school provides meals in accordance with the USDA's nutritional guidelines.

CITY	SCHOOL NAME	DESCRIPTION OF MEAL PROGRAM AND DELIVERY METHOD	PRICE OF MEALS	DESCRIPTION OF PROCEDURES ESTABLISHED BY CHARTER SCHOOL TO ENSURE THAT STUDENTS RECEIVE NUTRITIOUS AND WELL-BALANCED MEALS	CHARTER SCHOOL'S REASON FOR CHOOSING TO PROVIDE AN ALTERNATIVE MEAL PROGRAM	CHARTER SCHOOL'S RESPONSE TO THE QUESTION: DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Vista	School for Integrated Academics and Technologies (SIATech)	SIATech students receive meals through the federal Job Corps program.	Students do not pay for meals.	The federal Job Corps program follows the USDA's nutritional standards when planning its meals.	Partnership with the federal Job Corps program.	Yes. Students have access to a full-service cafeteria and they receive hot, nutritious meals daily.
Winchester	Temecula Preparatory School	Lunch is prepared and delivered by local restaurants selected by the lunch coordinator.	Lunch is $4 per day. Currently, the school does not have a provision in place for students who qualify for free or reduced-price meals.	The school's lunch coordinator uses her judgment in selecting nutritious foods, including a vegetarian option each day.	Most of the school's students bring their lunch from home; only about 8 percent purchase lunch. The school could not support a program from an outside company based on these numbers, so it chose this delivery method.	Yes. Only .01 percent of the school's students are low income, and it provides lunch if a student asks for one.
Woodland Hills	Ivy Academia	The school contracts with Royal Dining Catering, Inc. to deliver lunch.	Lunch is $3 per day. Low-income students receive free meals.	Royal Dining Catering, Inc. is "approved" by the California Department of Education's Nutrition Services Division. Royal Dining Catering, Inc. has registered dieticians to ensure that the menus comply with the USDA's nutritional standards.	The school has limited kitchen resources available on its campus.	Yes. Royal Dining Catering, Inc. provides well-balanced and nutritional meals to all students, regardless of whether they are low income. All students have the same options for lunch.

Sources: Charter schools' responses to Bureau of State Audits (bureau) Nutritional Needs of Charter School Students survey.

Note: To clarify the charter schools' responses, the bureau performed follow-up procedures such as contacting the schools or reviewing their Web sites. In some instances, the bureau made editorial changes to the charter schools' original responses.

Table A.2
Survey Responses From Charter Schools That Do Not Provide Meals to Their Students

CITY	SCHOOL NAME	HOW DOES YOUR SCHOOL ACCOMMODATE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS?	WHY THE SCHOOL DOES NOT PROVIDE MEALS	DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Bakersfield	Kern Workforce 2000 Academy	The school's hours are between 3 p.m. and 9 p.m. The students' nutritional needs are being met prior to school hours. If needed, students can purchase snack items from the school's student store during their 30-minute break.	The school participated in the school district's National School Lunch Program (lunch program) in its early years. However, the school discontinued its participation because student participation was too low to sustain the lunch program.	Yes. The school's hours are between 3 p.m. and 9:30 p.m. The students' nutritional needs are being met prior to school hours. If needed, students can purchase snack items from the school's student store during their 30-minute break.
Ben Lomond	San Lorenzo Valley Unified School District Charter School	The students in the program do not qualify for free or reduced-price meals.	The school cannot afford to purchase meals for students who do not qualify for free or reduced-price meals and who do not want to participate in the "packed-in" food from the sponsoring district's central kitchen.	Yes. The school does not have low-income students in the program.
Camarillo	Camarillo Academy of Progressive Education	The school receives donated food, and the students can have what is available.	The students' families were not interested in participating in the federal School Breakfast Program (breakfast program) or lunch program.	Yes. The school offers education and opportunities for families to learn what their child's nutritional needs should be. The school conducts workshops, and a nutritionist provides information to the families. In addition, the school receives very "generous" food donations from the families and will "never" allow a student to go hungry.
Chico	Blue Oak Charter School	The school's policy requires children of all incomes to bring healthy, nutritious food to school.	The school needs money to develop a certified kitchen.	Yes. The parents are typically health conscious, eat vegetarian diets, and do not believe in eating processed foods.
Hesperia	LaVerne Elementary Preparatory Academy	The parents are informed during enrollment that they must prepare a sack lunch for their child. The school provides soup and fruit if students forget their lunch.	The school does not have a kitchen.	No response.
Hume	Hume Lake Charter School	The school closes from 12 p.m. to 1 p.m. and its students go home for lunch.	The parents want their children to come home for lunch.	Yes. The school is located in a small and very connected community, which sees that the needs of all who live in the community are being met.
Inglewood	Century Community Charter School	The students' parents provide lunch and snacks. If needed, the school has sandwiches, snacks, and drinks available for hungry students.	The school cannot absorb the difference between the federal meal programs' reimbursement rates and the actual cost of the meals.	Yes. Parents are taking care of their children and, if needed, the school supplements.
Long Beach	Rosie the Riveter Charter High School	The students bring lunch from home.	The school is very small and has fewer than 45 students.	Yes. The students bring lunch from home.
Los Angeles	Ocean Charter School	The school works with individual families to ensure that the nutritional needs of its low-income students are being met.	The parents expressed the desire to take care of meals for their children.	Yes. The school sees evidence that its low-income students' nutritional needs are being met.
Los Angeles	Renaissance Arts Academy	The school informs the families that it does not provide lunches to students. The school has nutritional snacks that are available to any students who forget to bring their lunch.	The school does not provide meals due to the lack of facilities available to store, prepare, and serve food.	Yes. The school believes that the nutritional needs of the students are being met. The school has 320 students, and all students are aware of its lunch policy. The school's students and staff eat lunch together in the open classroom facility, and it would be apparent to staff if students were without food.

CITY	SCHOOL NAME	HOW DOES YOUR SCHOOL ACCOMMODATE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS?	WHY THE SCHOOL DOES NOT PROVIDE MEALS	DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Middletown	Lake County International Charter School	The students bring their snacks and lunch from home.	The school does not have facility space.	Yes. The parents provide meals for their children, and the school provides emergency food.
Modesto	Great Valley Academy	The students' parents send healthy snacks and lunches to school.	The "excessive" cost and the lack of a facility.	Yes. The school monitors the food children bring to school to make sure it is healthy. The school provides food from its pantry if students forget lunch or are still hungry after eating.
Napa	Stone Bridge School	The students bring snacks and lunch from home. The school's kindergarten classes prepare a healthy snack each day for all their students.	The cost of the breakfast and lunch programs and the meal choices prevent the school from providing meals.	Yes. The school's teachers encourage families to pack nutritious food and to avoid bringing sugary snacks or sodas.
Nevada City	Nevada City School of the Arts	The school does not accommodate the nutritional needs of its low-income students.	The school does not have a kitchen.	No. The students often show up with little or no food.
Oakland	American Indian Public Charter School II	The school's students provide their own lunch and are not permitted to bring fast food.	"It seems the school can run more efficiently without providing meals to its students."	Yes. The school educates students about nutrition through its middle school curriculum. The school does not allow students to eat fast food or drink sodas. In addition, the school's students share food with each other.
Oakland	East Oakland Leadership Academy	The students bring their lunch from home.	No response.	Yes. All students eat lunch, and the school provides a healthy snack during break.
Oakland	East Oakland Leadership Academy High School	The students bring their lunch from home.	No response.	Yes. The school makes sure that the students eat lunch, and it provides fruit in the morning.
Oakland	Oakland Charter Academy	The school does not provide a formal lunch program. However, it provides fresh fruit to those students who may not have brought lunch from home.	The school does not have a cafeteria. The school also lacks the funding to establish a lunch program.	Not sure. Most, if not all, of the school's students are eating meals cooked at home. The school encourages parents to make healthy home-cooked meals and provides them with referrals to local food pantries. The school has a partnership with local medical clinics that make presentations to its students and families on an ongoing basis. The school also has a policy of no sodas or fast food on campus.
Oakland	Oakland Charter High School	The school does not provide a formal lunch program. However, it provides fresh fruit to those students who may not have brought lunch from home.	The school does not have a cafeteria. The school also lacks the funding to establish a lunch program.	Not sure. Most, if not all, of the school's students are eating meals cooked at home. The school encourages parents to make healthy home-cooked meals and provides then with referrals to local food pantries. The school has a partnership with local medical clinics that make presentations to its students and families. The school also has a policy of no sodas or fast food on campus.

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CITY	SCHOOL NAME	HOW DOES YOUR SCHOOL ACCOMMODATE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS?	WHY THE SCHOOL DOES NOT PROVIDE MEALS	DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Pacific Grove	Monterey Bay Charter School	The students bring a snack and lunch from home. The school stocks lunch food, including soup, peanut butter and jam, bread, fruit, and juice. The students eat their lunch in the classroom and, if the teacher notices that a student does not have an adequate lunch, the school will provide lunch. The school's policy disallows sugary drinks or sodas, prepackaged food, or other nutritionally deficient foods.	The school does not have the facilities available to prepare or serve meals to its students.	Yes. The school has a high level of parent involvement, a school vegetable garden, a Farm to School program, and proactive policies regarding food and drinks that are brought on campus. The school believes the needs of low-income students are being met by the parents and supported by the school.
Petaluma	Live Oak Charter School	The school is currently unable to accommodate the nutritional needs of its low-income students.	The school does not have a cafeteria. The school has begun a dialogue with its sponsoring district about contracting for food service.	Not sure. The school does not have complete data on its low-income students.
Pine Mountain Club	Pine Mountain Learning Center	The students' parents pack their lunches, including beverages.	The school does not have the facilities to provide meals to its students.	Yes. The nutritional needs of the students are being met by their parents through their own resources or community food banks and other resources. The school provides instruction to its students on health and nutrition. The school also provides parents with nutritional education materials.
Red Bluff	Sacramento River Discovery Charter School	The school does not accommodate the nutritional needs of its students. Its staff, on a volunteer basis, keep soup, trail mix or granola bars on hand to give to hungry students.	The school does not have a kitchen.	No. There are probably students who do not tell the staff that they are hungry.
Richmond	West County Community High School	The students bring their lunch from home.	The school does not have the facilities to prepare or serve meals to its students and the school does not receive any funding to provide a lunch program.	No response.
San Diego	Xara Garden School	The school provides its students a healthy snack every day.	The school has a low number of students who qualify for the lunch program.	Yes. The school monitors what its students eat for lunch.
San Jacinto	San Jacinto Valley Academy	The school monitors the lunch students bring to make sure everyone has a nutritious meal. If needed, the school will contact the parents or its staff will provide lunch for the student.	The school has limited staff to implement a food service program and additional supervision.	Not sure. The nutritional needs are across the socio-economic range and are applicable to all students. The school stated that providing parents and students with nutritious lunch information is an ongoing priority.
San Jose	South Bay Preparatory Charter School	The school does not have low-income students.	The school stated that cost and low participation, as surveyed, prevent it from providing meals.	Yes.
San Jose	University Preparatory Academy	The students bring their lunch from home. In cooperation with a food give away program, the school issues food vouchers for needy families.	The school offered a lunch program when it first started, but at the request of parents and students it was discontinued. The school has very few students who qualify for free and reduced-price lunch, and it does not have enough funds to subsidize a lunch program.	Yes. The school has had no requests for free or reduced-price meals. In addition, the staff have been asked to make leadership aware if they notice children who are "suffering" from a lack of food. The school has received no alerts from its staff.
Santa Cruz	Pacific Collegiate School	The school will, when identified, provide for the nutritional needs of its students.	The school is leasing a facility that does not have an adequate kitchen to provide meals.	Yes. The school's teachers and staff are in contact with all students and believe the nutritional needs are being met for all students, including low-income students.

CITY	SCHOOL NAME	HOW DOES YOUR SCHOOL ACCOMMODATE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS?	WHY THE SCHOOL DOES NOT PROVIDE MEALS	DO YOU BELIEVE THE NUTRITIONAL NEEDS OF LOW-INCOME STUDENTS ARE BEING MET?
Santa Rosa	Village Charter School	The school does not provide any services.	The school has a low number of students eligible for free or reduced-price meals. The school also lacks the proper food preparation facilities and funding to provide meals.	Yes. The students who truly meet the requirements for free or reduced-price meals can receive food via the local agencies.
Sebastopol	Sebastopol Independent Charter School	The school provides a meal to all of its kindergarteners on a daily basis at no cost to the parents. However, the school does not provide meals for its students in grades 1 through 8.	The school does not have adequate serving facilities to ensure safe food storage and handling for its other students.	Yes. The school is small enough that its staff tend to know those students who need extra nutritious food and will provide them with food.
Sebastopol	SunRidge Charter School	The school cannot currently provide meals to its students at school.	The school is small and is located in very limited, rented facilities. The school does not have a commercial kitchen or the means to prepare, store, or serve meals.	Yes. The school is small, and its staff know each child and family. If needed, the school assists families by referring them to community resources.
Sonoma	Woodland Star Charter School*	No response.	No response.	No response.
Thousand Oaks	Meadows Arts and Technology Elementary	The students bring their own lunches. If students forget their lunch, they may call home to have lunch brought to school. However, the school will provide a nutritional snack if the student does not receive lunch.	The school does not have a working kitchen.	Yes. The school makes every effort to assure all students eat a healthy meal or snack.
Ukiah	River Oak Charter School	The students bring snacks and lunch from home. The school's teachers monitor the nutritional content of the food students are eating. The school provides extra food to students who need it from the "generous" donations of staff and parents.	The school does not have a cafeteria or kitchen.	Not sure. The school stated that it is hard to say.
Ukiah	Tree of Life Charter School	The school keeps "backup" food such as organic fruits and vegetables, crackers, and peanut butter in its kitchen in case its students do not have food.	The California Department of Education's application process for participation in the breakfast and lunch programs require the school to obtain bids from three vendors. The school has been able to locate only one local vendor willing to provide nutritious, organic lunches.	Yes. The school provides "backup" food in case its students do not have a lunch.
Walnut Creek	Eagle Peak Montessori School	The school informs all incoming students that it does not offer a lunch program.	The school does not have a cafeteria or kitchen available.	Yes. The school does not have students who do not bring lunch and a snack each day.
Wildomar	Santa Rosa Academy	The school requires its students to bring a snack or lunch. The school provides granola bars or breakfast bars for students who do not bring a snack or lunch.	The school is leasing a facility that does not have a kitchen.	Yes. The majority of the school's students (approximately 99 percent of them) bring a snack or lunch.
Wildomar	Sycamore Academy of Science and Cultural Arts	The parents provide lunch for their children.	The school cannot afford, nor does it have facilities available, to provide meals.	Yes. Parents provide lunch for their children.

Sources: Charter schools' responses to Bureau of State Audits (bureau) Nutritional Needs of Charter School Students survey.

Note: To clarify the charter schools' responses, the bureau performed follow-up procedures such as contacting the schools or reviewing their Web sites. In some instances, the bureau made editorial changes to the charter schools' original responses.

* The Woodland Star Charter School's survey response indicated that it did not participate in the breakfast or lunch program and did not provide an alternative meal program for its students. However, the school chose not to answer the remaining survey questions.

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Appendix B

STAKEHOLDER COMMENTS AND OPINIONS ON WHETHER CALIFORNIA'S CHARTER SCHOOLS MEET THE NUTRITIONAL NEEDS OF THEIR LOW-INCOME STUDENTS

The Joint Legislative Audit Committee (audit committee) directed the Bureau of State Audits (bureau) to survey key stakeholders on whether they believe charter schools are adequately providing nutrition to low-income students eligible for free or reduced-price meals. The bureau identified the following key stakeholders through its discussion with staff from the California Department of Education (Education): California Food Policy Advocates, the California School Nutrition Association, the California Association of School Business Officials, and the California Charter Schools Association. Table B summarizes the mission of each stakeholder and provides the bureau's summary of the comments and opinions of their representatives.

Table B
Bureau of State Audits' Summary of Stakeholder Comments and Opinions

STAKEHOLDER	MISSION	COMMENTS AND OPINIONS
California Food Policy Advocates (CFPA)	CFPA is a statewide public policy and advocacy organization dedicated to improving the health and well-being of low-income Californians by increasing their access to nutritious and affordable food. CFPA employs a variety of strategies to develop and implement public policies that recognize the value of adequate nutrition and its fundamental contribution to good health and development, education, and productivity.	The CFPA representative stated that some charter schools are meeting the nutritional needs of their low-income students, while others are not. Specifically, the representative stated that charter schools in the Los Angeles area are doing a better job of meeting the nutritional needs of their students and a significant number of charter schools in the Bay Area are not meeting the nutritional needs of their students. The federal School Breakfast Program (breakfast program) and National School Lunch Program (lunch program) have certain guidelines and standards that must be met in order for schools to participate in them, while alternative nutrition programs have no guidelines and standards for schools to meet. In some cases, the students may receive incomplete meals or meals with lower nutritional value. Furthermore, some charter schools are contracting with outside vendors to provide meals to their students, while other charter schools do not provide any type of meal to their students. Finally, the representative stated that although the nutritional needs of charter school students compete with the charter schools' other priorities, the charter schools should take advantage of federal and state resources available to them.
California School Nutrition Association (CSNA)	The CSNA provides its members resources for quality school nutrition programs and services as partners in academic achievement. Two of the CSNA's goals are to promote professionalism of school nutrition and to increase public and legislative awareness that child nutrition and academic achievement go hand in hand.	The CSNA representative stated that a charter school in her district participates in the lunch program and that the nutritional needs of students are being met. However, outside of her district, she is unaware of whether the nutritional needs of students are being met, which may be a concern. The representative stated that charter schools should establish food service agreements with their districts to receive meals through the breakfast and lunch programs. The districts can oversee the meals and claim reimbursement for the meals the charter schools provide to their students.

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STAKEHOLDER	MISSION	COMMENTS AND OPINIONS
California Association of School Business Officials (CASBO)	CASBO is a statewide professional organization serving California. CASBO provides its individual, district, and county office members with professional development, influential advocacy, vital information, and crucial networking opportunities. The mission of CASBO is to set the standard for best business practices and policies that support public education through high-quality professional development and effective advocacy, communication, and collaboration.	The CASBO representative stated that charter schools are not meeting the nutritional needs of their students. Specifically, the representative believes that charter schools do not participate in the breakfast and lunch programs because the administrative requirements for the programs are excessive, they do not have eligible students or the facilities to serve meals, and the cost to provide meals is more than the reimbursement they receive. The representative stated that those charter schools providing alternative nutrition programs do not measure up to schools participating in the breakfast and lunch programs because they are providing their students with the bare minimum, if any meals at all. Some schools may hire an outside source to provide meals to their students. However, to ensure that charter schools are meeting the nutritional needs of their low-income students, they could sign up to participate in the breakfast and lunch programs with either their own school district or a neighboring district.
California Charter Schools Association (association)	The association is the membership and professional organization serving charter schools in California. The mission of the association is to lead the charter public school movement in California in order to increase the number of students attending high-quality charter schools.	The association representative stated that although charter schools are not required to provide any meals for students, they still have a wide range of participation. For example, some schools participate in the breakfast and lunch programs, some have their own alternative nutrition programs, and others play an active role in educating parents and the community on health and nutrition. The representative provided some main examples of why charter schools do not participate in the breakfast and lunch programs such as scale, cost, and facility issues. The benefit is too small for many schools with low student enrollment and schools often do not have the staff, equipment, or facilities to offer food. In addition, the association representative provided two potential suggestions for getting more charter schools to serve meals: offering school districts incentives to include charter schools in their breakfast and lunch programs and providing charter schools start-up funding to construct necessary food service facilities or to purchase and install equipment. Finally, the representative stated his belief that if school districts met their legal obligation under Proposition 39, many charter schools would be able to participate in the breakfast and lunch programs.*

Sources: Interviews conducted by the Bureau of State Audits.

* Proposition 39 states that each school district shall make available, to each charter school operating in the school district, facilities sufficient for the charter school to accommodate all of the charter schools in-district students in conditions reasonably equivalent to those in which the students would be accommodated if they were attending other public schools of the district. Facilities provided shall be contiguous, furnished, and equipped, and shall remain the property of the school district. The school district shall make reasonable efforts to provide the charter school with facilities near to where the charter school wishes to locate, and shall not move the charter school unnecessarily.

(Agency comments provided as text only.)

California Department of Education
1430 N Street
Sacramento, CA 95814-5901

October 6, 2010

Elaine M. Howle, State Auditor*
Bureau of State Audits
555 Capitol Mall, Suite 300
Sacramento, CA 95814

Dear Ms. Howle:

Subject: Response to Bureau of State Audits Draft Audit Report No. 2010–104

This is the California Department of Education's (Education) response to the Bureau of State Audits' (BSA) draft audit report titled, *California's Charter Schools: Some Are Providing Meals to Students, but a Lack of Reliable Data Prevents the Department of Education From Determining the Number of Students Eligible for or Participating in Certain Federal Meal Programs*.

Recommendations for Education's Consolidated Application Data System:

To ensure the reliability of the Consolidated Application (ConApp) database fields related to the number of students enrolled at the school level, the number of those enrolled students who are eligible to receive free meals, and the number of those students who are eligible to receive reduced-price meals, Education should do the following:

1. Modify its ConApp database instructions to require local educational agencies (LEAs) and direct-funded charter schools to retain their documentation supporting the three data fields for a specified period of time.

2. Establish an internal control process such as a systematic review of a sample of the LEAs' and direct-funded charter schools' supporting documentation.

Education's Comments and Corrective Actions:

1. Education will modify its ConApp instructions to require LEAs and direct-funded charter schools to retain documentation supporting the three data fields in accordance with state and federal records retention requirements.

2. Education will consider establishing an internal control process to review a sample of the LEAs' and direct-funded charter schools' supporting documentation. (1)

* California State Auditor's comments begin on page 57.

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Recommendations for Education's Child Nutrition Information and Payment System:

To ensure the accuracy of the Child Nutrition Information and Payment System (CNIPS) database, Education should do the following:

1. Direct the school food authorities (SFA) to establish internal control procedures to ensure the accuracy of the application information they enter in the CNIPS database.

2. Direct its Nutrition Services Division (NSD) to modify the tool used to review a sample of the school food authorities' schools to include a procedure for verifying the accuracy of the county-district-school (CDS) code and site type reflected on the schools' applications.

3. Discontinue allowing the school food authorities to combine each site under their jurisdiction before they enter information on the number of students approved for free and reduced-price meals into the CNIPS database.

Education's Comments and Corrective Actions:

1. To ensure the accuracy of the CNIPS application information, each CNIPS application includes a "certification" check box which SFAs must check in order to submit the application. The certification reads in part: "I certify under penalty of perjury that the information on this application form is true and correct to the best of my knowledge." In addition to this certification, Education will post a notice on the first screen of the CNIPS advising sponsors of their responsibility to ensure the information they provide is accurate.

   To further ensure the accuracy of application information, Education will include a clause in the annual instructions reminding SFAs of their responsibility to ensure the CNIPS information they provide is accurate. The annual instructions will recommend a second person review the information before submittal. Education will also clarify that charter schools should be identified as such and not as public schools.

2. Full implementation of CNIPS is targeted for December 2010; thereafter, NSD plans to run weekly data matches against the public school directory at both the SFA and site level, and identify anomalies. The CDS code matches data within the public school directory, which includes charter schools. When a CDS code is entered in CNIPS, the CNIPS provides the name of the matching charter school from the public school directory.

   When new SFAs and sites are entered into CNIPS, the NSD obtains information from the public school directory for each site and enters the CDS code into CNIPS. For new applicants, if the site name/address provided by the SFA does not match the name/address provided by the directory, the NSD informs the SFA to contact Education's Data Management Division and the Charter School Division to update their information in the public school directory in order to be considered for approval.

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3. Education will work with the SFAs to transition to site level reporting by the beginning of next school year. For new SFAs, Education will consider requiring site level reporting immediately. (1)

To ensure that it maximizes the benefits from the State's investment in the CNIPS database, Education should do the following:

1. Require the school food authorities to submit a monthly Claim for Reimbursement for each site under their jurisdiction in addition to their consolidated claims.

2. Establish a timeline for the school food authorities to comply with the requirement.

Education's Comments and Corrective Actions:

1. To maximize the schools districts' acceptance with the automated system, Education initially required sponsors to report at the sponsor level, but the school districts could still elect to report at the site level. When CNIPS is fully implemented in December 2010, Education will begin working to require site level reporting for all school districts. However, currently, some school districts do not have the capability of uploading large amounts of site level data without manually keying in the data for each school site.

2. Education will work with the SFAs to transition to site level reporting by the beginning of next school year. For new SFAs, Education will consider requiring site level reporting immediately. (1)

Education's Comments Addressing Potential National School Lunch Program Barriers

Meal Quality

The report indicates that for three out of five charter schools visited, meals were provided outside of the federal meal programs because they "wanted to provide fresher, healthier food choices to their students than the breakfast and lunch programs provide." However, Education believes that this statement infers a significant misunderstanding of the meal programs among charter schools. Specifically, the U. S. Department of Agriculture (USDA) sets minimum nutrition standards for the meals served, and provides federal reimbursement for each meal meeting these minimum standards. The USDA standards allow SFAs significant flexibility in the meals they choose to serve, and many SFAs provide healthy and appealing meals that are popular with students while complying with USDA standards. (3)

Program Administration

The federal meal programs are complicated to administer, and many small school districts and charter schools have difficulty administering them. An option exists in state statute (*California Education Code* Section 41980) that allows school districts to form Joint Power Authorities (JPAs) for the specific purpose to jointly administer the meal programs. However, charter schools are not specified as being included in this state statute; therefore, Education has worked with charter schools to find other options.

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For example, charter schools are allowed to be "sites" under the umbrella of one charter school that serves as the actual SFA. Education piloted this approach with Aspire Charter Schools, which had about 22 other Bay Area charter schools under their administrative umbrella.

To help educate charter schools on the state and federal meal programs, Education has submitted a budget change proposal requesting additional resources, including a "charter school liaison," to provide the technical assistance needed to increase meal program participation among charter schools.

If you have any questions regarding this subject, please contact Kevin W. Chan, Director, Audits and Investigations Division, by phone at 916-323-1547 or by e-mail at kchan@cde.ca.gov.

Sincerely,

(Signed by: Geno Flores)

GENO FLORES
Chief Deputy Superintendent of Public Instruction

Comments

CALIFORNIA STATE AUDITOR'S COMMENTS ON THE RESPONSE FROM THE CALIFORNIA DEPARTMENT OF EDUCATION

To provide clarity and perspective, we are commenting on the response to our audit report from the California Department of Education (Education). The numbers below correspond to the numbers we placed in the margin of Education's response.

In response to our recommendations, Education states that it will "consider" establishing an internal control process to review a sample of local educational agencies' and direct-funded charter schools' supporting documentation and will "consider" requiring site-level reporting immediately. We look forward to Education's 60-day response for a more definitive decision regarding its intent to implement our recommendations. (1)

Education's alternative approach to implementing our recommendation raises concerns for us. Specifically, our recommendation on page 32 of the report is aimed at ensuring that the county-district-school (CDS) code and the site type entered into the Child Nutrition Information and Payment System (CNIPS) database by the school food authorities are accurate. In its response Education stated that, once it implements fully the CNIPS database, it will run weekly data matches against the public school directory at both the school food authority and site level. However, during the audit Education did not present its plan of performing weekly data matches against the public school directory to us. In fact, as reflected on page 23 of the report, Education's Nutrition Services Division (nutrition services) stated that it is the charter schools' responsibility to enter the CDS code into the CNIPS database. In addition, as reflected on page 20, when applying to participate in the federal School Breakfast Program (breakfast program) and National School Lunch Program (lunch program), a school food authority must complete an application for each of its school sites, and in doing so must indicate the site type. Our primary concern with Education's alternative approach to addressing our recommendation is that Education did not include in its response the internal controls it has in place to ensure the information in the public school directory is accurate. For example, Education stated that, when new school food authorities and sites are entered into the CNIPS database, nutrition services obtains information from the public school directory for each site and enters the CDS code into the CNIPS database. However, as stated on page 22, we found errors in the CDS code. Thus, we look forward to Education's 60-day response for an explanation of its internal controls over the (2)

process it uses to generate the public school directory and ensure the accuracy of the data included in the directory, particularly the CDS code and site type that are found in the CNIPS database.

(3) Education stated that it believes a statement in our report infers "a significant misunderstanding of the meal programs among charter schools." However, we disagree and believe that, in fact, Education does not understand the facts presented in our report. Specifically, on page 24, we state that 46 charter schools had various reasons for electing to provide meals without participating in the breakfast or lunch program. The primary reason cited by 15, or 33 percent, of the charter schools for having an alternative meal program is to allow them to provide what they described as fresher, healthier food choices to their students than the breakfast or lunch program provides. Further, on page 25, we state that the five charter schools we visited cited reasons that were consistent with those of the other charter schools. Specifically, three of the five charter schools we visited wanted to provide what they described as fresher, healthier food choices to their students than the breakfast or lunch program provides. It appears as though Education is taking exception with the statement regarding the schools we visited. However, it does not appear as though Education took into consideration that the statements made by the three schools we visited are consistent with those of 12 other charter schools that provide an alternative meal program. Further, the statements represent the charter schools' perspective and opinion regarding the quality of the breakfast and lunch programs, not ours. Finally, we did not assess whether charter schools alternative meals meet minimum standards.

cc: Members of the Legislature
Office of the Lieutenant Governor
Milton Marks Commission on California State Government Organization and Economy
Department of Finance
Attorney General
State Controller
State Treasurer
Legislative Analyst
Senate Office of Research
California Research Bureau
Capitol Press