



Hawai'i's Federally Subsidized Public School Lunch Program and the Hawai'i Department of Education's Food Safety Requirements for It

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Introduction

Most of us are aware that eating more fruits and vegetables can improve our health. With the rise in childhood obesity, it is becoming increasingly apparent that children, as well as adults, will benefit from this change. Buying produce from Hawai'i farmers is equally desirable for reasons of freshness, self-sufficiency, and sustainability. This fact sheet provides some general considerations when thinking about these two opportunities specifically in the public school lunch program (see Note on p. 4).

DOE's Public School Lunch Program

The State of Hawai'i has only one school district, comprised of all public schools under the Hawai'i Department of Education (HIDOE), making it one of only three single-district systems in the U.S. (Washington, DC, and Puerto Rico are the other two). The Hawai'i system is

the 9th largest school district in the nation, according to the U.S. Department of Education. Over 70 percent of school systems in the U.S. have fewer than 2,500 students, while there are 172,104 children in Hawai'i's 256 K-12 public schools in 2012.

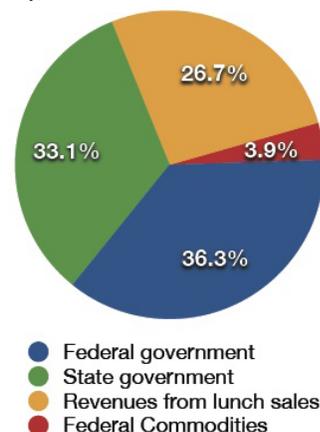
Each day approximately 100,000 lunches are served in Hawai'i's public schools. Fifty-three percent of the children are offered a daily lunch which is partially subsidized (reduced price) or fully paid for (free) by taxpayers in 2012. The remaining 47 percent of children pay full price for their lunches (Table 1).

The federal government pays 36.3 percent and Hawai'i taxpayers pay 33.1 percent for Hawai'i's public school lunch program and school lunch sales, and commodity programs account for the remaining 30.6 percent (Figure 1).

Table 1. 2012 price of public school meal

<i>Breakfast Price</i>	
Elementary student price	\$1.00
Secondary student price	1.10
Reduced student price	0.30
Student price – second meal	2.20
Adult price	2.20
<i>Lunch Price</i>	
Elementary student price	\$2.25
Secondary student price	2.50
Reduced student price	0.40
Student price – second entrée	5.00
Student price – second meal	5.00
Adult price	5.00

Figure 1. Source of funding for National School Lunch Program (NSLP), 2011.



There are over 13,500 school districts in the U.S., according to the U.S. Census of Business. Most states have many school districts; Hawai'i is unique with its single-district system. In every case, whether a state has one school district or fifty, each must meet U.S. Department of Agriculture (USDA) nutrition standards. These standards ensure that children in Montana schools are given the same meal pattern requirements as those on Moloka'i, and vice versa.

Since federal dollars are involved in the partial or complete purchase of school food, all state school lunch programs must follow federal rules. While there are many finer details to the rules, the ones most often discussed are these:

1. *Equivalency/equitability*

Foods offered during meal service must be available to all children. This rule ensures that there is no discrimination against any child because of an inability to pay the full price of a meal. Naturally, this also means that the school system must have access to a large enough volume of each food offered to meet district/federal requirements.

2. *Meets nutritional standards*

All children are offered foods that meet, on a daily basis, federally mandated nutritional standards, which include

age-appropriate calorie and nutrient levels. In Hawai'i, this translates into a matter of procuring foods that meet nutritional goals yet satisfy the diverse cultural tastes of our students.

3. *Meets school system's food budget*

Foods that meet the other two criteria must also be within the HDOE lunch program budget. The first two criteria are pretty firm, with very little wiggle room. The third criterion, however, is where there is some space for resourceful purchasing within a fixed budget. This is a good opportunity, for instance, to buy locally grown produce through local vendors, if these products can meet all three criteria. A similar opportunity exists in any state food-purchasing program subsidized by federal dollars.

The cost of a school lunch, like that of a meal in a restaurant, is broken down into three parts: food; labor; and supplies, contract services and indirect charges. The percentages for Hawai'i public school lunches are shown in Figure 2.

Let's look at the budgeting more closely, as this is typically where the discussion of buying locally grown or processed foods gets slowed down or stopped. Below is a typical meal made up of foods that meet the nutritional criteria (Table 2). This only illustrates the cost of raw materials, not the cost of labor, supplies, reheating, storage, etc.

Figure 2. Average percent school lunch service expenditure breakdown for Hawai'i, 2011.

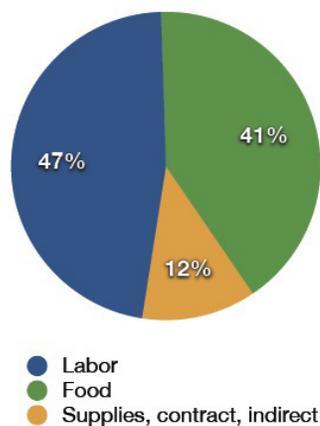


Table 2. Raw ingredients and costs for a typical Hawai'i public school lunch, 2012.

Item	Serving size (oz)	Serving cost	Cost/lb. delivered to school
Chicken	2.5	\$0.63	\$4.03
Broccoli	1.0	0.13	2.08
Pasta	4.0	0.36	1.44
Romaine	4.0	0.22	0.88
Whole wheat roll	0.9	0.06	1.07
Whole apple	4.0	0.15	0.60
Milk	8.0	0.39	6.24 (gal)
Total raw ingredients		\$1.94	

The cost per pound of a meal component, such as chicken, broccoli, or apples—all value added—delivered to the school system (by island).

While there may be a preference for locally grown foods in the federal school lunch procurement guidelines, the total cost of the meal must still be within budgeted parameters. A school lunch program cannot go into debt in order to buy locally grown foods; that is not fiscally prudent.

Hawai'i State Department of Education Food Service Requirements

Though Hawai'i's school food service program is guided by Hawai'i Revised Statute Section 302A-405 and Hawai'i Administrative Rules Chapter 37, the food service program must also follow federal guidelines because that is where the plurality (36.3%) of the program's funding comes from.

One area that federal rules leave up to the individual School Food Authorities, at this time, is the issue of "food safety." From the Hawai'i program's perspective, the safety of the food we provide children is a non-negotiable item—we insist on the highest standards. As a program best practice then, food must be grown, prepared, and manufactured under the 1998 FDA Good Agricultural and Practices (GAPs) and 2009 FDA Food Code, among other state and federal laws/rules and evolving industry best practices. As such, Hawai'i has recently added a fourth criterion to align with the earlier three federal criteria—food safety or best practices regarding the production, harvest, packing, transportation, and handling of fresh and processed produce.

4. The safety of fresh and processed products

All publicly provided foods that end up on the plates of Hawai'i's school children have to be grown on farms with annual GAP audits. GAP audits cover the best science-based, farm-size-neutral food production and handling practices, including the eight FDA principles (<http://tinyurl.com/3ot8bz5>) listed below. The School Food Services Branch also reserves the right to visit a supplying farm at any time, and all supply farms must have sufficient product liability insurance.

Principle 1. Prevention of microbial contamination of fresh produce is favored over reliance on corrective actions once contamination has occurred.

Principle 2. To minimize microbial food safety hazards in fresh produce, growers, packers, or shippers should use good agricultural and management practices in those areas over which they have control.

Principle 3. Fresh produce can become microbiologically contaminated at any point along the farm-to-table food chain. The major source of microbial contamination with fresh produce is associated with human or animal feces.

Principle 4. Whenever water comes in contact with produce, its source and quality dictate the potential for contamination. Minimize the potential for microbial contamination from water used with fresh fruits and vegetables.

Principle 5. Practices using animal manure or municipal biosolid wastes should be managed closely to minimize the potential for microbial contamination of fresh produce.

Principle 6. Worker hygiene and sanitation practices during production, harvesting, sorting, packing, and transport play a critical role in minimizing the potential for microbial contamination of fresh produce.

Principle 7. Follow all applicable local, state, and federal laws and regulations, or corresponding or similar laws, regulations, or standards for operators outside the U.S., for agricultural practices. (This includes the proper use of pesticides).

Principle 8. Accountability at all levels of the agricultural environment (farm, packing facility, distribution center, and transport operation) is important to a successful food safety program. There must be qualified personnel and effective monitoring to ensure that all elements of the program function correctly and to help track produce back through the distribution channels to the producer.

Similarly, raw agricultural commodities that are processed locally into what is then defined as "food" must be processed in a Hawai'i Department of Health-approved and inspected facility as per HRS 11-12 (<http://tinyurl.com/3epfq3x>).

Summary

The Hawai'i Department of Education School Food Services Branch is responsible for the quality, quantity, price-appropriateness, and safety of the food provided to Hawai'i's 172,104 public school children, as assessed by law, rule, or best practice. Any decision to purchase is based on the following four major considerations:

1. Equivalency/equitability
2. Nutritional standards
3. School system's food budget
4. Safety of fresh and processed products

Within these requirements, local farmers and producers may have the opportunity to provide food to the school lunch program.

Note

This document is intended to cover only Hawai'i's public school system's school lunch program and other food-related programs managed by the Food Service Branch, Hawai'i Department of Education. Hawai'i's 100 private/independent (<http://www.hais.org>) and Hawai'i's 31 Public Charter Schools (<http://www.hawaii charter-schools.com>) are not covered by this document. For more information about the latter two school types, see their respective websites.

Acknowledgments

The idea for this publication came from *The Cost of School Lunch* (<http://tinyurl.com/7nxz5tc>), by the national initiative School Food FOCUS. Thanks are owed to Dr. Douglas Vincent and Luisa Castro for their constructive reviews. Development of this publication was funded by the Agribusiness Development Corporation of the Hawaii Department of Agriculture.