



STATE OF MAINE
DEPARTMENT OF EDUCATION
23 STATE HOUSE STATION
AUGUSTA, ME 04333-0023

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

February 3, 2025

Bob England
Superintendent
RSU 71
41 Lions Way
Belfast, ME 04915

Dear Superintendent England

The RSU 71 Nutrition Program was reviewed per Federal Regulation 7CFR 210.18 and Maine Department of Education Child Nutrition policies and procedures. On January 15 & 16, 2025 Sarah Platt reviewed Belfast Area High School and Troy Howard Middle School. Two exit conferences took place. The first with Perley Martin occurred on January 16, 2025 and one with you occurred on February 3, 2025.

The enclosed Official Notification of Review Findings and Corrective Action describes the corrective action documentation required. Please submit a detailed response for each of the review findings listed in the report by the deadline(s) listed. Responses must be submitted through CNPweb, Maine Department of Education Child Nutrition's Administrative Review software, and must address the following:

- How the finding was corrected (include who, when & how)
- Documentation that the finding has been corrected district-wide
- How this action will ensure future compliance

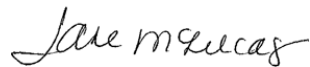
In accordance with §210.18(k), failure to return completed documentation within 30 days from the corrective action deadline date will result in the withholding of reimbursement payments. We hope that following the exit conference you and your staff addressed the corrective actions and that you will have no problems in meeting the response deadline.

The Official Notification also provides the potential fiscal action, which is an initial estimate of the amount of reimbursement that will be reclaimed. These are only estimates which must be adjusted to the actual date of corrective action for each violation. If documentation of corrective action or acceptable corrective action is not received by the response date stated above, the claim will be recalculated to the end of the school year.

Local Education Agencies have the right to appeal findings which impact their reimbursement. For more information visit <https://www.maine.gov/doe/sites/maine.gov.doe/files/inline-files/Child%20Nutrition%20Appeals%20Process.pdf>

We hope that this review has been helpful to you and your staff. If you should have any questions, or if we can assist in any way, please feel free to contact Sarah Platt at 592-2410 or email sarah.d.platt@maine.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jane McLucas".

Jane McLucas
Child Nutrition Director

JM/SP/pn



SNP Administrative Review Report

RSU 71 (1733)

Program Year 2025

RSU 71 (1733)

41 Lions Way
Belfast, ME 04915

Food Service Contact

Mr. Perley L Martin
Director of Nutrition
(207) 338-3320

Executive Contact

Mr. Bob England
Superintendent
(207) 338-1960

No. of Sites / Reviewed: 7 / 2

Month of Review: December 2024

Notes & Commendations

- * The RSU 71 School Nutrition Program Administrative Review consisted of both off-site and on-site portions. The on-site review occurred at Troy Howard Middle School and Belfast High School on January 15 & 16, 2025. We appreciate the time and effort it took to prepare for this review. The program should be commended for its use of local, fresh foods. There were findings in a high priority area - meal pattern compliance. With training and monitoring, we are confident these issues will be resolved.

Meal Counting & Claiming - RSU 71 (1733)

313. On-site observation - validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions

Finding 9000: Unallowable Meal Count Procedure at Gladys Weymouth School

Weymouth School uses a starting tray count and ending tray count to determine the number of meals to claim for reimbursement. This is an unallowable method. Program regulations require that meals be counted at the point of service which is the point when a student has a complete reimbursable meal.

Corrective Action:

Discontinue the use of tray counts and implement a corrected lunch count procedure. Submit the following documentation:

- A detailed statement of how this finding has been corrected
- Documentation of communication with all school nutrition program staff regarding proper meal counting procedure (ex. Copy of email or memo used)

Submit requested documentation in CNPweb --> E-reviews --> Corrective Action Responses by 3/7/2025

General Program Compliance - RSU 71 (1733)

810. Non-discrimination on appropriate Program materials

Finding 9000: Incorrect version of the non-discrimination statement used on program menus.

An incorrect version of the federal non-discrimination statement was used on program menus. This was corrected prior to the onsite review.

1216. Validate OFS #1206 - Did School Nutrition personnel meet annual training requirements

Finding 9000: Professional Standards Training Hours Not Met

Annual training is required and documentation of continuing education hours for all food service employees must be maintained. The required annual professional development hours are as follows:

School Nutrition Director	12 Hours
Kitchen Manager	10 Hours
Staff (20+ hours/week)	6 Hours
Part time Staff (<20 hours/week)	4 Hours

SNP Administrative Review Report**RSU 71 (1733)*****Program Year 2025***

The minimum required training hours were not met last year for program staff. 2.5 hours have been completed for the current year. Findings during this Administrative Review may have been prevented if staff were receiving adequate training. A plan is needed to ensure proper training is received prior to the end of this school year.

Corrective Action:

Submit a detailed training plan for all school nutrition staff including dates of training, topics, and sources of training.

Submit corrective action documentation in CNPweb -> E-reviews -> Corrective Action Responses by 3/7/2025

1403. Did any review of agricultural food components indicate violations of the Buy American provision?

Finding 9000: Buy American Technical Assistance**Technical Assistance:**

The Buy American provision requires school food authorities to purchase, to the maximum extent practicable, domestic commodities or products.

Recently, the USDA established a new threshold for school food authorities that use exceptions to this requirement. The limit on the percent of total commercial food costs from non- domestic foods will be phased in over 7 school years.

- Beginning in SY 2025-26, the non- domestic food purchases cap will be 10 percent.
- Beginning in SY 2028-29, the non- domestic food purchases cap will be 8 percent.
- Beginning in SY 2031-32, the non- domestic food purchases cap will be 5 percent.

This phased-in approach will allow schools to gradually adjust to the new requirement

SNP Administrative Review Report**RSU 71 (1733)****Program Year 2025****Belfast Area High School (735)**41 Lions Way
Belfast, ME 04915

Month of Review: December 2024

Date of Onsite Review: January 16, 2025

Meal Components & Quantities - Belfast Area High School (735)*402. DOR - quantities served meet daily meal pattern requirements for age/grade groups***Finding 9052: Day of Review portion sizes insufficient. *Repeat Finding**

As observed during the onsite review, the portion sizes of meal components did not meet the minimum meal pattern requirements for the age/grade group(s) being served. For lunch, all meals offered to students in grades 9-12 must provide at least 2-ounce equivalents of grain, 2-ounce equivalents of meat/meat alternate, 1 cup vegetable, 1 cup fruit and 8 ounces of milk. Insufficient portion sizes include:

- Chicken Alfredo – the recipe credits as 1.25 grain and 1.75 meat/meat alternate. A 1-ounce roll was available but not served with the meal, so the meal itself did not contain sufficient grain.
- Peanut butter & Jelly Sandwich (repeat finding, 17 meals disallowed) - the recipe is correct; however, it is not being followed. The sandwich did not provide an adequate amount of peanut butter to comply with meal pattern requirements.

Corrective Action:

What changes will be implemented to ensure that menus planned, and all recipes will offer the minimum meal pattern requirements?

What will be done to ensure that compliant recipes will be followed?

How will sandwiches without any meat/meat alternate be easily identified so the cashiers know the meal pattern contribution?

Provide the 'Edit Check Report' for the month of January 2025. The reviewer will follow-up about the process to reclaim meals.

Provide detailed responses and requested documentation in CNPweb --> E-reviews --> Corrective Action Responses by 3/7/2025

Technical Assistance:

Technical assistance was provided during the 2016 Administrative Review and onsite during the current Administrative Review.

*409. Review period production records and supporting documentation - were required meal components offered and daily/weekly requirements met.***Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) were not met.**

Based on a review of production records and other supporting documentation from the Review Period (December 2-6, 2024), some meals served did not meet meal pattern requirements for the age/grade group being served.

Breakfast production records indicate that fruit was not served with each meal recorded for reimbursement. It is a requirement that a student select at least 1/2 cup fruit along with two additional items for a breakfast meal to be counted for reimbursement. 480 breakfast meals are not eligible for reimbursement. The production records did not reflect that milk was offered at breakfast. Milk is a required component at breakfast and lunch and must be offered to students. Based on a review of invoices and onsite observation, the reviewer believes milk was offered but not recorded.

Lunch production records indicate that all five of the required vegetable sub-groups were not offered during the review week. This was identified as an issue during the prior two reviews. Two subgroups were not offered; therefore, two days of lunch counts (357 meals) are not eligible for reimbursement.

SNP Administrative Review Report**RSU 71 (1733)****Program Year 2025**

Production records are used to support the claiming of meals and therefore, must document all items that are offered and the quantities served as part of a reimbursable meal.

Corrective Action:

The December 2024 site claim for Belfast High School must be revised to disallow 357 lunches and 480 breakfasts. Revise claim as instructed in review Question 410 - finding 9076.

Revision must be completed by 3/7/2025.

Technical Assistance:

Technical assistance was provided during the on-site visit and during the prior two Administrative Reviews.

410. Review period menus and production records – quantities and meal pattern requirements**Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements. *Repeat Finding**

For lunch, all meals offered to students in grades 9-12 must provide at least 2-ounce equivalents of Meat/Meat Alternates, 2-ounce equivalents of Grain, 1 cup of fruit, 1 cup of vegetables and 8 ounces of milk. For breakfast, all meals offered to students in grades 9-12 must provide at least 1–2-ounce equivalents of Grain, 1 cup of fruit and 8 ounces of Milk. Production records were reviewed from the Review Period (December 2-6, 2024) to determine whether the portion sizes of meal components served met the minimum meal pattern requirements for the age/grade group(s) being served.

On two days, the amount of grain offered with the main meal was not enough to meet meal pattern requirements. This was also an issue during the 2016 Administrative Review. Meals are not eligible for reimbursement.

The recipe/production record for the deli bar does not meet the minimum quantity for meat/meat alternate. The combined total of meat/meat alternate and cheese is not sufficient for meeting the meal pattern requirements for grades 9-12. This is a repeat finding from the 2019 Administrative Review and technical assistance was provided during the 2016 Administrative Review. Meals are not eligible for reimbursement.

Corrective Action:

Provide a detailed response with supporting documentation showing how meals offered will meet minimum quantity requirements.

Meals served with insufficient quantities are not eligible for reimbursement. Revise the December 2024 site claim for Belfast High School as follows:

Lunch - 2312 total meals

Breakfast - 1839 total meals

Corrective Action must be completed by 3/7/2025

Technical Assistance:

Technical assistance was provided during the 2016 & 2019 Administrative Reviews.

General Program Compliance - Belfast Area High School (735)**1409. Storage violations observed****Technical Assistance:**

During the onsite review at Belfast High School, food that had been delivered that morning was observed sitting out in the storeroom. It was noted that it had been out for 45 minutes. Staff were asked to put the delivery away as it contained perishable items.



SNP Administrative Review Report
Program Year 2025

RSU 71 (1733)

Troy A Howard Middle School (736)

41 Lions Way
Belfast, ME 04915

Month of Review: December 2024

Date of Onsite Review: January 15, 2025

Meal Components & Quantities - Troy A Howard Middle School (736)

409. Review period production records and supporting documentation - were required meal components offered and daily/weekly requirements met.

Finding 9075: Production records/supporting documentation indicate weekly meal pattern requirements for the age/grade group(s) were not met.

Based on a review of production records and other supporting documentation for the week of December 2-6, 2024, some meals served did not meet the meal pattern requirements for the age/grade group(s) being served.

Lunch production records indicate that all five of the required vegetable subgroups were not offered during the review week. This is a repeat finding from the prior review. Two subgroups were not offered therefore two days of lunch counts (394 meals) are not eligible for reimbursement.

Corrective Action:

Revise the December 2024 site claim for Troy Howard Middle Schools:
Lunch - 2760 meals

Claim revision to be completed by 3/7/2025

410. Review period menus and production records – Quantities and meal pattern requirements

Finding 9076: Planned menus served during Review month do not meet portion size/quantity requirements.

Productions records were reviewed to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade group(s) being served. At lunch, the daily sandwich choices did not offer the required weekly minimum amounts of meat/meat alternate.

Production records for the week of review document that fruit juice was the only offering of fruit at breakfast. One cup of fruit must be offered daily, and juice cannot exceed more than 50% of the fruit offered for the week. Technical assistance was provided on fruit juice requirements during the 2016 review.

Production records are used to support the claiming of meals and therefore, must document all items that are offered and quantities served as part of the reimbursable meal.

Corrective Action:

Revised sandwich recipes were received during the onsite review.

Submit 5 consecutive days (Monday – Friday) of breakfast production records to support compliance with the breakfast meal pattern.

Corrective action received during onsite review.

Technical Assistance:

The school was provided technical assistance during the on-site visit.