



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

PAUL R. LEPAGE
GOVERNOR

ROBERT G. HASSON, JR., Ed.D.
COMMISSIONER

November 28, 2018

Craig Jurgensen
Superintendent
Bristol Public Schools
767 Main Street 1-A
Damariscotta, ME 04543

Dear Superintendent Jurgensen:

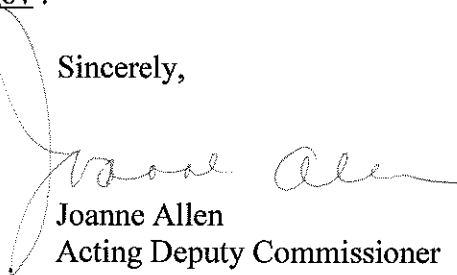
An Administrative Review of the Bristol School Nutrition Program was conducted on October 31, 2018. We appreciated the assistance given by you and your staff.

The enclosed Official Notification of Review Findings and Corrective Action describes the corrective action documentation and completion dates discussed during the exit conference. Please return a signed copy of this Official Notification when submitting the corrective action documentation. **Please provide the corrective action documentation within 45 days of the date of this letter.** Failure to do this may result in the withholding of reimbursement payments until it is received and/or a follow-up visit verifies that corrective action has been determined as acceptable. 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.

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 Stephanie Stambach at 624-6732 or email stephanie.stambach@maine.gov.

Sincerely,



Joanne Allen
Acting Deputy Commissioner

JA/SLS/sjs

Enclosure

cc: June Gallant

**Administrative Review Report
Bristol School Nutrition Program
October 31, 2018**

Introduction

The Bristol School Nutrition Program was reviewed. Bristol Consolidated School was selected based on Federal Regulation 7CFR 210.18 and Maine Department of Education, Child Nutrition policies and procedures.

Performance Standard 1: Meal Access and Reimbursement

Certification and Benefit Issuance- Eligibility status from the prior school year must be carried over for the first 30 school days or until an application is received, based on federal regulation 7CFR 245.6. This was not followed and all status changes were made on September 30th. Technical assistance was provided to June Gallant, School Nutrition Director.

All meal benefit applications are approved by the school level staff and then sent to June Gallant at the central office to enter the eligibility status into Nutri Kids. The same information is also being entered into Power school by the administrative assistant at each school for economic status purposes, which doubles the work. As recommended during the previous review, the application approval process should be moved to the central office to maintain student confidentiality and to streamline the process.

Verification- No findings.

Meal Counting and Claiming- No findings.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- Only one type of milk was offered for breakfast, which is a repeat finding from the previous review. Corrective action is required and fiscal action will be assessed for the missing milk type. The bread used to make French toast sticks was found to be non-whole grain rich.

A non-whole grain taco shell was served for lunch during the week of review. Technical assistance was provided and the taco shell will not be counted as a grain component. Menu substitutions were made for the week of review based on what was available in inventory. It was recommended that all AOS 93 kitchen managers be provided a list of products they could purchase to meet the meal pattern and to improve consistency among all schools. This was also mentioned during the previous review.

Production Records: Production records must document the items offered and quantities served as part of a reimbursable meal. Production records for the week of review were very incomplete with missing meal components and few portion sizes listed. On site observation and a review of invoices showed that all meal components are being offered. More recent production records were reviewed on site and are much improved. Attention is still needed to ensure the production records are complete and accurate.

Resource Management

For SY 2018, revenues and expenses were obtained from the Monthly Income and Expenses report found in NEO. Town support in the amount of \$20,709.00 is not included in our comparison of expenses to revenue below:

| SY 2018 | Target | Actual |
|--------------------------------------|---------------|---------------|
| Percentage of Food to Total Revenue | 35-40% | 30.85% |
| Percentage of Labor to Total Revenue | 50-55% | 64.34% |
| Percentage of Other to Revenue | <u>5-10%</u> | <u>5.73%</u> |
| | 100% | 100.92% |

Paid Lunch Equity (PLE)- The program has complied with the PLE requirement by using non-federal funds to offset the need to increase paid lunch prices.

Meal Charging- The School Nutrition Program has a charging policy/procedure, as required.

General Program Compliance

Records and Record Keeping- Reports are submitted to the State Agency in a timely fashion and program records are kept for three years, as required.

Food Safety and Sanitation- The most recent health inspection was not posted for public view and was moved to a visible location while the reviewer was on site.

Only a plain wedding band can be worn in the kitchen, based on the most current Maine Food Code. The kitchen manager was observed wearing a ring with a diamond.

Civil Rights- An incorrect nondiscrimination statement was used on notification letters sent to families regarding meal benefits. The full, correct statement can be found on the Child Nutrition website. This is a repeat finding from the previous review.

Documentation of civil rights training was not kept for Nancy Corson, kitchen staff, at the time of the review but has since been completed. Jennifer Robeiro, Sue Shiminkski and Andrea Cox all have various responsibilities in the school nutrition program and must participate in annual civil rights training. Training will need to be completed as part of corrective action.

Wellness Policy- The wellness policy was reviewed and the following elements were missing:

- Standards and nutrition guidelines for all foods and beverages sold during the school day that are consistent with Federal regulations
- Policy for food and beverage marketing consistent with Maine statute §6662 (3) Food and beverage advertising

- Representation from a variety of district and community members including teachers of physical education, school health professionals, school board, school administration, parents, students, and food service.

Corrective action is required for the missing components. It was recommended that there be a separate heading for “nutrition promotion” and “other school based activities to promote student wellness” for ease when assessing those goals, which is required every three years.

Training/Professional Standards- For School Year 2018, Kristine Dyer, Kitchen Manager met her annual training hours; however Nancy Corson did not. Online trainings and webinars are some ways to meet these training hours.

As School Nutrition Director, June Gallant has met the required training hours. Andrea Cox operates the register for lunch and therefore needs to receive training in identifying reimbursable meals. No documentation of training was on file.

It was recommended for all AOS 93 kitchen staff to meet regularly to discuss different topics such as proper menu substitutions, recipes and production records, which can be counted towards the professional standards hours. Kristine Dyer, kitchen manager, could discuss creative uses of different ingredients with the group.

Corrective Action- Corrective action is required as a result of this Administrative Review. The enclosed form outlines what is required. A detailed response and documentation of the corrective action must be returned to our office by the date specified, along with the enclosed form signed by the Superintendent.

Findings- As part of the Healthy, Hunger Free Kids Act of 2010, review findings must be posted and made available to the public by federal law. This can include posting the review report on the district website or making it available at a public hearing or school board meeting.

Summary

Overall, the Bristol School Nutrition Program is running well. Continuous improvement is needed in making sure production records are complete and meal pattern requirements are being followed. Kristine Dyer, Kitchen Manager, is passionate about feeding her students and it was evident that the students enjoy their meals and feel welcomed. The amount of scratch cooking at the school was impressive and appreciated.

Sincerely,



Stephanie Stambach MS, RD, SNS
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Bristol Public Schools

Local Education Official: Craig Jurgensen

Instructions: Please submit a detailed response for each of the review findings listed below. Responses must be attached to this document 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

This review will remain open until this form has been signed and returned by the Local Education Agency Official, along with the requested documentation that the review finding(s) has been corrected. 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.

Finding 1 - Performance Standard 2: *Meal Components and Quantities*

One milk type was offered at breakfast during the week of review.

Corrective Action: Submit a copy of menus and production records for the week of November 12, 2018.

Date Due: Within 45 days from date on enclosed letter

Estimated Fiscal Action: \$409.92 (all breakfasts for the week of review)

Finding 2 – General: *Civil Rights*

Incorrect nondiscrimination statement on eligibility notification letters to parents

Corrective action: Submit copy of the updated letter with the full nondiscrimination statement

Date Due: Within 45 days from date on enclosed letter

Estimated Fiscal Action: None at this time

Finding 3 – General: *Civil Rights*

School staff with responsibilities in the nutrition program have not participated in annual civil rights training

Corrective action: Submit training documentation with signatures and dates

Date Due: Within 45 days from date on enclosed letter

Estimated Fiscal Action: None at this time

Finding 4 - General: *Wellness Policy*

Wellness policy missing the required elements

Corrective action: Update wellness policy and send the final, approved version to the reviewer.

Date Due: 60 days

Estimated Fiscal Action: None at this time

Reviewer's Signature Stephan Stanley Date 11/29/18

You may be subject to a revisit if the error tolerance level was exceeded.

1st Review Revisit

Date Mailed to School/Institution Official 11/29/18

Submit to: Maine Department of Education
Child Nutrition
136 State House Station
Augusta, ME 04333-0136

Send Response no later than Within 45 days from date on enclosed letter

| <u>Signature of Local Education Agency Official</u> | <u>Superintendent</u> | <u>Date</u> |
|---|-----------------------|-------------|
|---|-----------------------|-------------|