



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

June 19, 2019

Robert England
Superintendent
Islesboro Public Schools
PO Box 118
Islesboro, ME 04848

Dear Superintendent England:

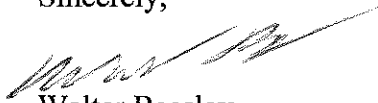
An Administrative Review of the Islesboro School Nutrition Program was conducted on May 8, 2019.

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 by September 30, 2019.** 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,



Walter Beesley
Child Nutrition Director

WB/SS/pp

**Administrative Review Report
Islesboro School Nutrition Program
May 8, 2019**

Introduction

The Islesboro School Nutrition Program was reviewed 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- All meal benefit applications were approved correctly. Technical assistance was provided to Katie Yeatts, the approving officer, that SNAP/TANF numbers automatically qualify children for free meal benefits. The approving officer had not been signing the bottom of the applications which is required. Technical assistance was provided.

Verification- The application chosen for verification was selected randomly instead of using the error prone method. The error prone method must be the first method of verification and there was one error prone application on file. Technical assistance was provided. Katie Yeatts was listed as the hearing official on the verification notification letters when it should be the head of school, who would handle appeal requests.

As a result of the verification process the student changed from free to paid status. The family was given more than 10 calendar days for the change to take effect; based on federal requirements no more than 10 calendar days can be given. The verification official was also reminded to document any follow up attempts to contact families.

Meal Counting and Claiming- Meal counts for the month are consolidated in an Excel spreadsheet by student name. Meal counts by category (free, reduced and paid) for each day are not being maintained, which is needed to ensure the free and reduced meal counts do not exceed the number of eligible students. Corrective action is required. One suggestion is to modify the spreadsheet to capture this information.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- A review of menus and production records was conducted. Additional information is needed and was requested from the Food Service Director to complete the menu review. As a K-12 school, Islesboro Central School would need to meet meal pattern requirements for both grades K-8 and 9-12. Based on the available information the following meal pattern findings were identified:

- Two milk types were not offered Monday through Thursday. Suggestions were provided to meet this requirement as a milk dispenser is used.
- Non-whole grain rich items were offered including a dinner roll, garlic bread and hamburger roll.
- The daily 2 oz meat/meat alternate offering for grades 9-12 was not met on two occurrences. Recipes either need to be adjusted or an additional M/MA offered.

- The weekly ½ cup legume requirement was not met. This can easily be met by offering a legume on the salad bar.

The production record must document all meal offerings, including the daily salad bar and milk choices, and if serving sizes differ among grades. It was suggested to create a Master production record template for daily meal offerings in order to streamline paperwork.

On the day of review the planned lunch meal only contained 1.5 ounces of grain. Prior to lunch service, this was quickly fixed so that 2 ounces of grain was offered to meet the minimum grain serving for grades 9-12.

Meal signage: The required lunch signage explaining to the students what they can select for a reimbursable meal was not available on the day of review. Sample signage was emailed prior to the onsite review but was not put in place.

Resource Management

For SY 2018, revenues and expenses were obtained from the Monthly Income and Expenses report found in NEO:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	175.10%
Percentage of Labor to Total Revenue	50-55%	191.24%
Percentage of Other to Revenue	<u>5-10%</u>	<u>22.58%</u>
	100%	388.92%

This figure does not include the town support of \$64,241.00 reported in NEO for SY 2018. The percentages shown do not fall within the typical ranges due to a variety of factors including the size of the program and freight costs. However; the expense to revenue ratio should be monitored on a monthly basis for possible improvements.

The adult meal price must cover the cost of the meal as no reimbursement is given for adult meals. Currently, adults are charged \$4.15 and the average per meal cost from SY 2018 was \$9.09. The difference is being subsidized by the town.

Meal Charging- The payment procedure for meals is included in the student handbook. It states that students will receive an alternative lunch if they have outstanding payments which is not current practice. This must be revised to ensure families have the correct information and to clearly explain the process. The procedure will also need to address the new legislation related to meal charging that will take effect in SY 2020.

General Program Compliance

Records and Recordkeeping- For SY 2019, 6 out of 9 claims for reimbursement have been filed late. Late claims are a component used to determine fiscal management and is a factor in

awarding federal grants, including equipment assistance grants and the Fresh Fruit and Vegetable Program (FFVP).

Food Safety and Sanitation- Written Standard Operating Procedures (SOP) were not available and will need to be developed. A link to sample procedures was emailed to Peter Anderson, Food Service Director. This was a finding during the last two reviews. It was also noted that a cleaning schedule is needed which could be added to the SOP manual.

Temperature logs are not maintained for the walk-in freezer and cooler. Logs must be kept to ensure temperatures are in the normal ranges. On the day of review, the freezer was not working properly and the temperature was elevated due to electrical issues thus emphasizing the need to check and record temperatures on a daily basis.

A crack was noted in the kitchen door to the outside. Per the facilities director there have been no recordings of pest sightings. The crack must be sealed immediately to prevent pests from entering the kitchen.

Civil Rights- An outdated And Justice for All poster was posted in the cafeteria and was replaced with the correct one on the day of review. The eligibility notification letters to families did not contain a non-discrimination statement as required. This was completed prior to the on-site review and no further action is needed.

All staff with responsibilities in the school nutrition program must receive annual civil rights training. Civil rights training had not been completed at the time of the review. Corrective action is required.

Wellness Policy- Islesboro has a wellness policy on file. To be in compliance the wellness policy must include the following elements:

- Goals for nutrition promotion
- 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.

Corrective action is required.

Training/Professional Standards- Peter Anderson, Food Service Director, has not met the annual 12 hours of training required for a director. Online training opportunities were emailed prior to the on-site review. Training in the areas of meal pattern and production records would be beneficial. Part-time nutrition staff must also have 4 hours of training each year.

Non-school nutrition staff that has responsibilities in the school nutrition program must be trained in their applicable areas. It was recommended that Katie Yeatts, the approving officer and verification official, attend verification training to keep current with the requirements. Ongoing training is needed for all staff to keep up with regulation changes.

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.

Summary

Improvements are needed across all aspects of the program for the Islesboro School Nutrition Program to be in compliance with program requirements. Peter Anderson, Food Service Director, is a new director and is eager to make the necessary changes. The attention given to scratch cooking was particularly impressive and providing high quality meals to the students is much appreciated.

Sincerely,


Stephanie Stambach MS, RD, SNS
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Islesboro Public Schools

Local Education Official: Robert England

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 1: *Meal Access and Reimbursement: Certification and Benefit Issuance*
Meal benefit applications are not being signed by the approving official, Katie Yeatts

Corrective Action: Submit statement that all applications for SY 2019 have been signed and dated

Date Due: September 30, 2019

Estimated Fiscal Action: None at this time

Finding 2 - Performance Standard 1: *Meal Access and Reimbursement: Verification*
Verification process was not completed correctly

Corrective action: Submit plan for how verification training will be completed for SY 2020, including the method (webinar or in person training).

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 3 - Performance Standard 1: *Meal Access and Reimbursement: Meal Counting and Claiming*
Meal counts by category for each day are not being maintained

Corrective action: Submit free, reduced and paid meal counts by day for September 2019

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 4 - Performance Standard 2: *Meal Pattern and Nutritional Quality: Meal Components and Quantities*

Meal pattern findings identified; additional information needed to finish menu review

Corrective action 1: Submit recipes, nutrition facts labels and ingredients requested by the reviewer.

Corrective action 2: Submit lunch production records for September 9-13, 2019

Date Due: September 30, 2019

Estimated Fiscal Action: None at this time; however repeat findings in future reviews may result in fiscal action

Finding 5 – Performance Standard 2: Meal Pattern and Nutritional Quality: Meal Signage

Lunch meal signage was not available

Corrective action: Submit photo of meal signage once posted.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 6 – Resource Management: Meal Charging

Payment procedure for meals in student handbook needs to be updated.

Corrective action: Submit updated language to reviewer.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 7 – General Program Compliance: Records and Record Keeping

Multiple late claims for reimbursement filed in SY 2019

Corrective action: Submit written procedure on how claims will be filed and approved on time in SY 2020.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 8 – General Program Compliance: Food Safety and Sanitation

Standard Operating Procedures (SOP's) were not available

Corrective action: Develop SOP manual and submit cover sheet and two sample procedures. Please indicate timeline when project will be completed.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 9 – General Program Compliance: Food Safety and Sanitation

Temperatures for the walk-in freezer and cooler were not taken

Corrective action: Submit temperature logs for the month of September 2019.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 10 – General Program Compliance: Food Safety and Sanitation

Crack in kitchen door to the outside

Corrective action: Submit photo when crack has been sealed and copy of pest logs for SY 2019.

Date Due: September 30, 2019

Estimated Fiscal Action: None

Finding 11 – General Program Compliance: Civil Rights

