



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

PAUL R. LEPAGE
GOVERNOR

December 18, 2018

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

James Underwood
Superintendent
Milford Public Schools
13 School Street
Milford ME 04461

Dear Superintendent Underwood:

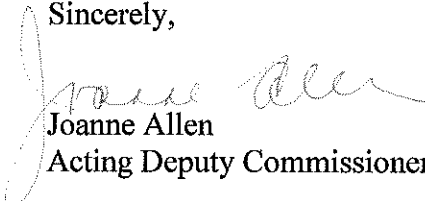
An Administrative Review of the Milford School Nutrition Program was conducted on November 26, 2018. We appreciated the assistance given by you and your staff.

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 30 calendar 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 Kaitlin Fayle at 624-6666 or email kaitlin.fayle@maine.gov.

Sincerely,



Joanne Allen
Acting Deputy Commissioner

JA/KF/sjs

Enclosure

cc: Donna Conary

**Administrative Review Report
Milford School Nutrition Program
November 26, 2018**

Introduction

The Milford School Nutrition Program was reviewed. Dr. Libby S. Lewis was selected to represent the district 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- Applications were approved on time using the correct income eligibility requirements. No errors were found.

Verification -The correct time line for verification was not followed, making the verification report, due to the State Agency by November 20th, late.

Below is a proposed timeline for verification reviews:

First, the Verifying Official determines how many free and reduced price meal applications were approved as of October 1, and calculates how many free and reduced price meal applications need to be verified. Next, the Confirming Official conducts confirmation review of the free and reduced price meal applications that were selected for verification. In early October the Determining Official sends letters to households selected for verification. The families should be provided adequate time to respond, it is suggested to give about 10 days. If no response, a second attempt to contact the family must be made, this can be done with an additional letter or phone call. After the second notification attempt, if no response, then a final letter should be sent to the family notifying that their status will be changed to paid after 10 calendar days. All attempts of contacting families should be documented. This process should be completed no later than November 15 and the verification report should be submitted by November 20th.

Meal Counting and Claiming- Meal counts are taken manually by student roster. No problems were found.

Performance Standard 2: Meal Pattern and Nutritional Quality

Production Records:

Production were reviewed for the week of October 1, 2018. Production records were found to be neat and well organized.

Meal Components and Quantities-

Menus from the review period showed the following problems:

- The full $\frac{3}{4}$ cup vegetable was not offered on 3 days, Monday, Thursday and Friday, October 1, 4 & 5, 2018
- Weekly minimum $\frac{1}{2}$ cup serving amount for starchy vegetable was insufficient.

An easy way for this school to meet both the vegetable subgroups and the required vegetable serving size would be to offer two different types of vegetables in 1/2 cup servings at each lunch meal service, and giving all students the option of taking one or both types of vegetables. If the school chose to do this, students would then be offered one cup of vegetable with the option to take 1/2 cup under Offer vs Serve, and menu planners would have an easier time meeting vegetable subgroup requirements when planning two different types of vegetables each day.

Resource Management

For SY 2018, revenues and expenses were obtained from the district. Town support in the amount of \$24,476.00 is not included in our comparison of expenses to revenue below:

| SY 2018 | Target | Actual |
|--------------------------------------|---------------|---------------|
| Percentage of Food to Total Revenue | 35-40% | 49.54% |
| Percentage of Labor to Total Revenue | 50-55% | 62.81% |
| Percentage of Other to Revenue | <u>5-10%</u> | <u>5.88%</u> |
| | 100% | 118.24% |

Town Support or district money used to support the Nutrition Program should be recorded in the Claim for Reimbursement in NEO under “Town Support” in the month that is received. Town Support received in the previous school year was recorded as Children/Adult/Other. Subsidy received from the month prior is not regularly recorded in the claim. The Town Office receives the subsidy and often does not report back to the school when it was received or confirm the amount received. Going forward, communication needs improvement between the Town Office and the school. It may be best for the school to reference the ED 293A Monthly Reimbursement Earned Report in NEO. To find, report the subsidy received before filing each month’s claim.

Paid Lunch Equity (PLE)- The program has complied with the PLE requirement.

Meal Charging- Corrective action is required. The school is currently working on approving a meal charging policy/procedure. The finalized meal charging policy will need to be sent to the reviewer.

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- No findings. Health Inspection reports were displayed for public view. Written food safety Standard Operating Procedures (SOP) were on file.

Civil Rights-Corrective action is required. The Verification Notification letter did not contain the requires Civil right statement. Corrective action is required.

Wellness Policy- Corrective action is required. The wellness policy was reviewed and the following elements were missing:

- Policy for food and beverage marketing consistent with Maine statute §6662 (3) Food and beverage advertising

Fresh Fruit and Vegetable Program (FFVP)- No findings, the school does a great job documenting food and labor expenses.

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 Dr. Lewis S. Libby School's nutrition program is running well. Kitchen staff were receptive to technical assistance provided and willing to work quickly to resolve any issues. They have shown initiative to learn and make improvements to the program. I look forward to seeing their progress in the next administrative review.

Sincerely,



Kaitlin Fayle
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Milford Public Schools

Local Education Official: James Underwood

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: Annual Verification Report was submitted late to the State Agency.

Corrective Action 1: Please write a detailed explanation of how verification will be documented and completed on time, going forward.

Date Due: Within 30 calendar days of the date on the enclosed letter

Estimated Fiscal Action: None at this time.

Finding 2 – Performance Standard 2: Meal Components and Quantities - *Menu documentation from the review period did not meet meal pattern requirements.* Insufficient serving of vegetable on three days during the review period.

Corrective Action 2: Provide the reviewer with documentation of production records for the week of December 10, 2018.

Date Due: Within 30 calendar days of the date on the enclosed letter

Estimated Fiscal Action: This has potential for fiscal action with repeat findings in future reviews.

Finding 3 - General: Civil Rights – Eligibility letters and verification letters going home to students need the full Civil Rights statement. The Civil rights statement can be found on our website <https://www.maine.gov/doe/schools/nutrition/nondiscrimination>

Corrective Action 3: Provide the reviewer with a copy of the written verification notification letter that will be used going forward, continuing the full civil rights statement.

Date Due: Within 30 calendar days of the date on the enclosed letter

Estimated Fiscal Action: None

Finding 4- General: Town Support not recorded correctly in NEO.

Corrective Action 4: Please describe how, when, and by who, Town Support and Subsidy received will be recorded in NEO, going forward.

Date Due: Within 30 calendar days of the date on the enclosed letter
Estimated Fiscal Action: None

Finding 5 - General: Local Wellness Policy – District does not have an approved, compliant wellness policy.

Corrective Action 5: Submit a compliant policy that has been approved by the school board.

Date Due: Within 60 calendar days of the date on the enclosed letter
Estimated Fiscal Action: None

Reviewer's Signature  Date 12/19/2018

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

1st Review Revisit

Date Mailed to School/Institution Official 12/19/18

Submit to: Maine Department of Education
Child Nutrition
23 State House Station
Augusta, ME 04333-0023

Send Response no later than Within 30 calendar days of the date on the enclosed letter

Signature of Local Education Agency Official

Title

Date

Superintendent