



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

October 31, 2018

Elaine Boulier
Superintendent
RSU 42
PO Box 1006
Mars Hill, ME 04758

Dear Superintendent Boulier:

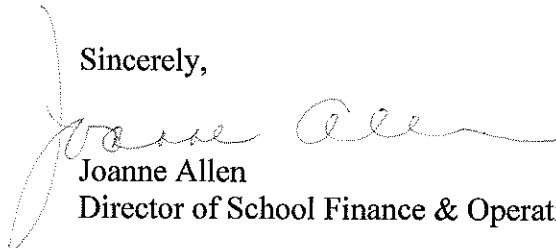
An Administrative Review of the RSU 42 School Nutrition Program was conducted on October 25 & 26, 2018. We appreciated the assistance given by you and your staff.

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 by December 1, 2018.** 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
Director of School Finance & Operations

JA/KF/sjs

Enclosure

**Administrative Review Report
RSU 42 School Nutrition Program
October 25 & 26, 2018**

Introduction

The RSU 42 School Nutrition Programs were reviewed. Central Aroostook High School 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- A statistical sample of 140 student eligibility applications were reviewed. Two applications were approved incorrectly. One application was approved as Free when it should have been Paid. The other application was approved as reduced when it should have been paid. Letters have been sent to the families notifying them of their correct status. Copies of the letters have been shown to the reviewer.

Verification- Verification was done incorrectly. A weekly paystub was compared to the original application which reported monthly income. This weekly paystub should have been converted to annual pay. This application stayed reduced when it should have been changed to paid status. Technical assistance (TA) was provided to Kathy Miller, verifying official for the conversion error.

Meal Counting and Claiming- Corrective action is required.

Second meals purchased by students were counted in the paid category on the claim for reimbursement. Meal counts must be corrected for the August and September claims filed in SY 2019. Claim back up documentation for these two months will need to be submitted to the state agency for further validation.

Student rosters used to check off students receiving a meal were not coded to maintain student eligibility confidentiality. Student rosters will need to be edited to maintain student confidentiality going forward.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- Corrective action is required.

Production Records:

Review Period: Five consecutive days of breakfast and lunch menus and production records were reviewed for the week of August 27, 2018. Breakfast and lunch production records need work.

Lunch

Production records did not document all foods and food quantities offered to students, this includes items placed on salad bars, types of fruit, as well as variety of milk. The serving size for fruit and vegetable components for grades 9-12 is 1 cup. Production records referenced ½ cup as

the serving size for both these components. During the onsite visit it was clear that sufficient offerings of all components were available to students. Corrective action is required for menu planners to show with documentation that all five vegetable subgroups are met throughout the week in required serving sizes. During the week of review legumes were not offered, this is a repeat finding from the previous review.

- The following items did not meet the required 2 oz. equivalent grain for grades 9-12:
 - Muffin served on 8/29/18
 - French toast sticks served on 8/31/18
- The following item did not meet the required offering for meat/meat alternate:
 - 1 oz. cheese stick served on 8/31/18

During the onsite review, it was found that the salad bar offered additional grain and meat/meat alternate items. Corrective action is required for the salad bar recipe and production record to accurately reference what was offered for documentation of meeting the meal pattern.

Breakfast

Three breakfast items listed below do not meet a 1 oz. grain equivalent:

- Chewy granola bar
- Cheese-it crackers
- Graham crackers

Production records reflected that students could take multiples of these items listed above. TA was provided to kitchen staff that students need to take two of these items going forward to meet a 1 oz. equivalent, and have the option to take up to 4 items to meet the 2 oz. required offering for grades 9-12. A suitable replacement should be found for the three items listed above, offering these items increases food costs and makes it more difficult to meet the meal pattern.

Day of Review:

Breakfast and lunch was observed at Central Aroostook High School. No problems were found during lunch service. At breakfast students who received a meal from the breakfast cart in the hall were required to go to the cafeteria if they wished to receive a milk. Point of service should not be before a student receives a meal. All components must be offered before being checked off as receiving a reimbursable meal. TA was given to kitchen staff to have milk available to students and a larger breakfast cart suggested.

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 \$25,000 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	57.77%
Percentage of Labor to Total Revenue	50-55%	63.83%
Percentage of Other to Revenue	5-10%	<u>4.72%</u>
		126.32%

Food costs can be lowered with the purchase of products that can more easily meet the meal pattern.

Paid Lunch Equity (PLE)

- The program has complied with the PLE requirement.

Meal Charging

- The School Nutrition Program has a charging policy/procedure.

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.
- Town support for \$25,000 was recorded in the August claim for reimbursement under Children, Adults, and Other. TA was provided to record this in the districts financials under Town Support.

On-Site Monitoring

- Was completed correctly and available for review.

Food Safety and Sanitation- No problems were found

- Health Inspection reports were displayed for public view.
- Written food safety Standard Operating Procedures (SOP)

Civil Rights

- No findings were noted.

Smart Snacks

- Vending machines were found to not be compliant with smart snack standards for grades 7 & 8. Flavored water, and Vitamin Water were found to be available for students to purchase. During the on-site review machines were unplugged and made unavailable to students. The school is looking into a compliant replacement.

Wellness Policy

- The wellness policy was reviewed and is compliant. Competitive foods policy referenced in the wellness policy is not compliant. The content includes Chapter 51, which is out dated and has been replaced by Smart Snacks Standards.

Training/Professional Standards – Staff are on track to meet the required training hours. TA was provided to keep track of training hours for all nutrition staff in a excel spread sheet. Going forward the district will need to keep track of training documentation in one place.

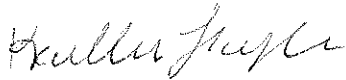
Corrective Action- Corrective action is required as a result of this Administrative Review. The enclosed form outlines what is required. A detailed response and documentation of the corrective action must be returned to our office by the date specified, along with the enclosed form signed by the Superintendent.

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

Staff at Central Aroostook High School have shown that increasing student participation and providing good nutrition is a priority. With the implementation of a breakfast cart, as well as a second chance breakfast, participation in the program has increased significantly. Staff seem very enthusiastic and engaged in with the students during meal time. With some work on proper documentation this program is on track to meet program requirements. It has been a pleasure working with all those involved in the nutrition program at RSU 42 and I look forward to working with them in the future.

Sincerely,



Kaitlin Fayle
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: RSU 42

Local Education Official: Elaine Boulier

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*

2 Applications were approved incorrectly.

Corrective Action 1: Is complete. Letters have been sent home updating families of corrected status. Fiscal action is required.

Date Due: December 1, 2018

Person Responsible: Kathy Miller

Estimated Fiscal Action: To be determined

Finding 2- Performance Standard 1: *Meal Access and Reimbursement*

Student rosters need to be written to maintain confidentiality.

Corrective Action 2: Provide the reviewer with an updated student check off list.

Date Due: December 1, 2018

Person Responsible: Kathy Miller

Estimated Fiscal Action: None at this time

Finding 3 - Performance Standard 1: *Meal Access and Reimbursement*

Second meals purchased by students were counted in the paid category on the claim for reimbursement.

Corrective Action 3: Meals claimed in August and September will need to be recounted, and claims will need to be adjusted, back up documentation must be sent to the reviewer for validation.

Date Due: December 1, 2018

Person Responsible: Kathy Miller

Estimated Fiscal Action: To be determined

Finding 4 - Performance Standard 1: *Meal Access and Reimbursement*

Verification for SY18 completed incorrectly

Corrective action 4: RSU 42 will send the reviewer a copy of the SY19 verification.

Date Due: December 1, 2018

Person Responsible: Kathy Miller

Estimated Fiscal Action: None at this time

Finding 5 - Performance Standard 2. Meal Components and Quantities

Legumes were not served during the week of review; this finding is a repeat from the previous review, fiscal action is required.

Corrective Action 6: Send the reviewer a copy of 5 consecutive days of production records and updated recipe for the salad bar for the week of November 5, 2018.

Date Due: December 1, 2018
Person Responsible: Cathy Miller
Estimated Fiscal Action: \$190.32

Finding 6 - General- Smart Snacks Standards

Vending machines not compliant for 7th and 8th grade students.

Corrective action: Please send the reviewer a detailed answer as to how this has been corrected.

Date Due: December 1, 2018
Person Responsible: Cathy Miller
Estimated Fiscal Action: None at this time

Finding 7 - Wellness Policy

Wellness policy referenced the competitive foods policy. The competitive foods policy referenced Chapter 51, which is outdated.

Corrective action: Update competitive foods policy to replace Chapter 51 with Smart Snacks Standards.

Date Due: December 1, 2018, an extension may be granted upon request
Person Responsible: Elaine Boulier
Estimated Fiscal Action: None at this time

Reviewer's Signature *Heather Kapp* Date 10/31/18

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

X 1st Review Revisit

Date Mailed to School/Institution Official 11/1/18

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

Send Response no later than December 1, 2018

Signature of Local Education Agency Official Superintendent _____
Title Date