



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

May 15, 2019

Kenneth Kunin
Superintendent of Schools
South Portland Public Schools
130 Wescott Road
South Portland, ME 04106

Dear Superintendent Kunin:


An Administrative Review of the South Portland School Nutrition Program was conducted on April 23, 2019 and April 24, 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 June 15, 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 Sarah Platt at 624-6879 or email sarah.d.platt@maine.gov.

Sincerely,


Walter Beesley
Child Nutrition Director

WB/SP/pn

Administrative Review Report
South Portland School Nutrition Program
April 23 & 24, 2019

Introduction

The South Portland School Nutrition Program received a revisit Administrative Review due to meal pattern and accountability findings from the SY 2018 Administrative Review. South Portland High School and Skillin Elementary School were 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- Meal benefit certification was reviewed for 420 students. One error was found.

Verification- No findings.

Meal Counting and Claiming- Meal counts from the January and March 2019 District Claim for Reimbursement were validated and no errors were found.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- The South Portland School Nutrition Program has made improvements in this area since the prior review, however additional improvements are necessary to be compliant with regulations.

Skillin Elementary School

Breakfast production records were completed correctly with the exception of not specifying the type of fruit offered. It is important to list the type of fruit offered because of crediting differences.

The menu assessment from the review period showed that students were provided with the required amount of vegetables each day, but the subgroup requirement for 'starchy' vegetables was not met. Missing vegetable subgroups is a repeat finding.

Elementary schools must offer 7 ounce equivalents of whole grain over the course of the week for all meal options. Skillin Elementary School did not comply with this requirement. This is a repeat finding.

South Portland High School

There are numerous meal choices available every day at the high school. With so many options, it is especially important that there is clear instruction and documentation on how everything contributes to the meal pattern to ensure that only reimbursable meals are claimed. Consistent and clear instruction, in the form of standardized recipes; and documentation, in the form of complete production records are lacking and resulted in the following findings:

- During the review period, the starchy vegetable subgroup was not met. Additional production records were reviewed while on-site and missing vegetable subgroups appeared to be a regular occurrence. This is a repeat finding.
- During the review period, there was insufficient grain offered with the pork dinner, ravioli, and salad bar meal.
- During the day of review, meat/meat alternate was not offered with the pasta meal. This had not been communicated with cashiers prior to service and two meals were incorrectly claimed for reimbursement before technical assistance was provided.
- During the day of review, insufficient grain was offered with the salad bar meal. This was corrected by offering two dinner rolls with each salad meal.
- Production records do not contain sufficient detail to support the claiming of all reimbursable meals including documentation that the milk component was offered to students. Breakfast and lunch production records need to be revised to include the specific food offered, portion size, crediting information, quantity offered and served, and total number of reimbursable and a la carte meals. All meal components must be recorded on the production record. The lack of detail makes it difficult to validate the number of reimbursable meals claimed for federal reimbursement with the number actually produced and served. This is a repeat finding.
- Many recipes are not standardized, providing clear instructions on how to prepare and serve an item and how it contributes to the meal pattern.

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 \$430,000 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	43.2%
Percentage of Labor to Total Revenue	50-55%	88.44%
Percentage of Other to Revenue	<u>5-10%</u>	<u>4.78%</u>
	100%	136.42%

Meal Charge Policy- As of July 1, 2017, School Nutrition Programs must have a written local meal charge policy to address situations when students do not have funds to pay for their meal at the time of the meal service. The policy must be communicated to all households. The South Portland School Nutrition Program does not have a charging policy as required. Corrective action is requested with this finding.

General Program Compliance

Smart Snacks Competitive Foods Rule- At South Portland High School, the hot cocoa and cappuccino that were sold to students were not compliant. Corrective action is required.

Wellness Policy- The wellness policy was compliant with requirements.

Training/Professional Standards- No findings.

After School Snack Service- During the month of March, insufficient fruit/vegetable was offered. For the afterschool snack program, the minimum serving size of fruit and vegetables is ¾ cup. On two occasions, a half cup was offered. Technical assistance was provided to Martha Spencer.

Fresh Fruit and Vegetable Program (FFVP)- The school nutrition program was recently awarded funds to re-institute the FFVP for the remainder of the school year. No findings.

Corrective Action

Corrective action is required as a result of this revisit 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

The South Portland School Nutrition Program has shown improvement from the prior review, particularly in the area of Certification and Benefit Issuance. Work is still needed to improve and streamline the menu planning documentation to ensure that students are offered the minimum quantities and support compliance with the meal pattern. Program staff were receptive to feedback and will benefit from being provided with additional guidance. I appreciate the time and effort provided throughout the review.

Sincerely,



Sarah Draper Platt, RD, SNS
Child Nutrition Consultant

Administrative Review
Official Notification of Review Findings and Required Corrective Action

Local Education Agency: South Portland School Department

Local Education Official: Kenneth Kunin, Superintendent

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: Certification and Benefit Issuance – *One meal benefit application incorrectly approved.*

Corrective Action: Corrected on-site and family notified of the error.

Estimated Fiscal Action: None

Date Due: N/A

Finding 2 – Performance Standard 2: Meal Components and Quantities – *Review Period lunch meal pattern errors: missing vegetable subgroups, insufficient grain offering at elementary school, missing grain offering at high school*

Corrective Action: Describe the process that has been put in place to ensure vegetable sub-groups are met. Submit documentation that this has been corrected.

Corrective Action: Describe the process that has been put in place to ensure daily and weekly Grain requirements are met. Submit documentation that this has been corrected.

Estimated Fiscal Action: See Finding 4

Date Due: June 16, 2019

Finding 3 – Performance Standard 2: Meal Components and Quantities - *Day of Review meal pattern errors: No meat/meat alternate offered with 24 pasta entrees at the high school*

Corrective Action: Describe the process that has been implemented to offer a pasta meal with meatless sauce that complies with meal pattern requirements of offering meat/meat alternate.

Corrective Action: Submit a standardized recipe for 50 servings of this entrée.

Estimated Fiscal Action: See Finding 4

Date Due: June 16, 2019

Finding 4 – Performance Standard 2: Meal Components and Quantities- *Inadequate documentation (recipes and production records) at South Portland High School.*

Corrective Action: Revise breakfast and lunch production records to document that all meal choices comply with meal pattern guidelines.

Total Estimated Fiscal Action for PS2 Findings: \$5,519.33
Date Due: June 16, 2019

Finding 4 – General: Smart Snacks – *Hot cocoa and cappuccino sold at the High School were not compliant with Smart Snack Guidelines.*

Corrective Action: Describe how this violation has been corrected and what will be don't to ensure future compliance.

Estimated Fiscal Action: None
Date Due: June 16, 2019

Finding 5 - General: Local Meal Charge Policy – *District does not have a written meal charge policy.*

Corrective Action: Develop a meal charge policy and post it on the school nutrition program website. Submit a copy of the policy to the reviewer for documentation.

Estimated Fiscal Action: None
Date Due: June 16, 2019

Reviewer's Signature  Date 5/16/19

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

1st Review Revisit

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

Signature of Local Education Agency Official

Superintendent

Date