

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

A. PENDER MAKIN COMMISSIONER

May 31, 2019

Michael Felton Superintendent St George Public Schools PO Box 153 Tenants Harbor, ME 04860

Dear Superintendent Felton:

An Administrative Review of the St George School Nutrition Program was conducted April 10, 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 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 St. George School Nutrition Program April 10, 2019

Introduction

The St. George School Nutrition Program was reviewed. St. George 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

<u>Certification and Benefit Issuance</u>- Student eligibility status from the prior year carries over for the first 30 school days of the subsequent year or until a new meal benefit application is received. For seven students, an application was not received and their status was not changed after the 30th school day. These students were inadvertently receiving reduced meal benefits and should have been changed to paid. Warning messages were displayed by the Nutri Kids eligibility software and were disregarded. There was one Master eligibility list error where a student was listed as free but should have been reduced. Both of these issues were corrected while the reviewer was on site and all students are now in the correct meal benefit categories.

The current practice is for an employee who has not been trained in school nutrition program regulations or confidentiality to enter income information into Nutri Kids. Eligibility information should only be accessed by trained staff or employees who need to upload data to the Maine Department of Education. School nutrition staff and other trained staff would also be aware of program guidelines such as the 30 day status carryover. The issues identified above could have been prevented if school nutrition staff oversaw this process. The district is in the process of making changes so the appropriate individuals are responsible for data entry into Nutri Kids.

Verification- No findings.

Meal Counting and Claiming- No findings.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- A review of the menu and production records for lunch showed that the ³/₄ cup vegetable requirement was not met for the daily sandwich options. Some of the vegetable choices were only offered with the main entrée. In order to correct this it was recommended to offer the salad bar more frequently, which would also help meet the weekly vegetable sub groups.

The peanut butter and jelly sandwich is a daily option and did not meet the weekly meat/meat alternate of 9 ounces; on the day of review a cheese stick was offered and in doing so every day would meet the 9 ounce minimum.

<u>Production Records</u>- Portion sizes and the recipe/product information was not listed on the production records for breakfast. Suggestions were given to streamline recording the meal offerings on the production record, while also documenting that meal pattern requirements are

being met. Lunch production records were completed thoroughly and the kitchen staff does a good job recording the amount prepared and leftovers.

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%	59.42%
Percentage of Labor to Total Revenue	50-55%	120,19%
Percentage of Other to Revenue	<u>5-10%</u>	0.68%
	100%	180.29%

This figure does not include the town support of \$28,400.00 reported in NEO for SY 2018. Due to the size of the program, the percentages shown do not fall within the typical ranges. However; the expense to revenue ratio should be monitored on a monthly basis to make sure costs are being covered.

The adult meal price must cover the cost of the meal as no reimbursement is given for adult meals. Currently, adults are charged \$4.00 and the average per meal cost from SY 2018 was \$6.03. The difference is being subsidized by the town. Effective in SY 2020, the adult meal price will increase to \$5.00 and the town or other non-federal funding source would need to absorb the remainder of the cost.

<u>Meal Charging</u>- At the time of the review, the meal charging policy was in the process of being revised. The policy has since been approved by the school board and no further action is needed.

General Program Compliance

Food Safety and Sanitation - No findings. The kitchen was kept clean and orderly.

<u>Civil Rights</u>- The non-discrimination statement on eligibility notification letters needed updating to reflect the most current statement. Civil rights training also had not been completed by some of the kitchen staff. Both of these areas have been addressed and no further action is needed.

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

Corrective action has already been taken and the district now has a compliant policy

<u>Breakfast Program</u>- Alternative serving models were discussed during the review as breakfast participation was noticeably low. Some examples to consider are breakfast in the classroom or

breakfast carts. When looking to increase meal participation customer service should also be evaluated, which can have an impact on participation.

<u>Training/Professional Standards</u>- No findings. All school nutrition staff are on track to meeting their required training hours. Janet Harjula, Food Service Director, and Cassie Kilbride, Business Manager, regularly attend Child Nutrition trainings including Back to Basics and Back to Basics II. Staying current with training is critical to ensure program requirements are being met and can also reduce findings during reviews.

<u>Corrective Action</u>- 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

Janet Harjula and Cassie Kilbride are working hard to meet the school nutrition program regulations and guidelines. They were eager to make the necessary changes and were receptive to feedback provided during the review. I am confident that with time the St. George School Nutrition Program will be up to speed with all program requirements. It was a pleasure to review this program.

Sincerely,

Stephanie Stambach MS, RD, SNS

Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: St. George Public Schools

Local Education Official: Michael Felton

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 30 day status carryover did not end for seven students, one Master eligibility list error

Corrective action: Submit plan for how the carryover end date will be captured in Nutri Kids and that warning messages will be reacted to.

Date Due: June 30, 2019

Estimated Fiscal Action: \$310.31

Finding 2- Performance Standard 1: Meal Access and Reimbursement: Certification and Benefit Issuance Untrained employee with access to Nutri Kids and meal eligibility information

Corrective action: Submit names and titles of individuals who will be responsible for data entry in Nutri Kids.

Date Due: June 30, 2019

Estimated Fiscal Action: None at this time.

Finding 3 – Performance Standard 2: Meal Pattern and Nutritional Quality: Meal Components and Quantities

³/₄ cup vegetable not met for the daily sandwich options and weekly meat/meat alternate not met for the peanut butter and jelly sandwich.

Corrective action: Submit lunch production records for May 20-24, 2019

Date Due: June 30, 2019

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

Finding 4 – Performance Standard 2: *Meal Pattern and Nutritional Quality: Production Records*Breakfast production records were incomplete

Corrective action: Submit breakfast production records for May 20-24, 2019.

Date Due: June 30, 2019

Estimated Fiscal Action: None at this time

Corrective action: N/A- school board approved policy has been sent to the reviewer.		
Date Due: N/A Estimated Fiscal Action: None		
Finding 6 – General Program Compliance: Civil Rights Eligibility notification letters did not contain the current Federal and State non-discrimination statemen		
Corrective action: N/A- completed while the reviewer was on site.		
Date Due: N/A Estimated Fiscal Action: None		
Finding 7 – General Program Compliance: Civil Rights Civil rights training had not been completed by kitchen staff		
Corrective action: N/A- documentation of training has been sent to the reviewer.		
Date Due: N/A Estimated Fiscal Action: None		
Finding 8 – General Program Compliance: Wellness Policy Wellness policy is missing the required elements.		
Corrective action: N/A- a compliant wellness policy has been submitted to the reviewer.		
Date Due: N/A Estimated Fiscal Action: None at this time		
Reviewer's Signature Atyman Date 5/31/19		
You may be subject to a revisit if the error tolerance level was exceeded.		
X 1st Review Revisit		
Submit to: Maine Department of Education Child Nutrition 136 State House Station Augusta, ME 04333-0136		
Signature of Local Education Agency Official Title Date		

Finding 5 – Resource Management: *Meal Charging* Meal charging policy in process of being revised.