JANETT. MILLS GOVERNOR

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

A. PENDER MAKIN COMMISSIONER

November 25, 2019

James Stoneton Superintendent Airline CSD 19 School St. Orrington, ME 04474

Dear Superintendent Stoneton:

The Airline CSD Nutrition Program was reviewed on October 29, 2019 per Federal Regulation 7CFR 210.18 and Maine Department of Education Child Nutrition policies and procedures.

The enclosed Official Notification of Administrative Review Findings and Corrective Action describes the corrective action documentation required. Please submit a detailed response for each of the review findings listed in the report. Responses must be submitted through CNPweb, Maine Department of Education Child Nutrition's Administrative Review software, 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

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. 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 must be recalculated to the end of the school year.

Local Education Agencies have the right to appeal findings which impact their reimbursement. For more information visit https://www.maine.gov/doe/sites/maine.gov.doe/files/inline-files/Child%20Nutrition%20Appeals%20Process.pdf

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 Adriane Ackroyd at 624-6726 or email <u>Adriane.ackroyd@maine.gov</u>.

Sincerely,

Walter Beesley

Child Nutrition Director

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WB/AA/pp

Enclosure



SNP Administrative Review Findings

Airline CSD (1038)

Program Year 2020

Airline CSD (1038) 19 School Street Orrington, ME 04474 Food Service Contact Kathy Cobb Cook 2075843012

No. of Sites / Reviewed: 1 / 1

Month of Review: September 2019

Commendations

- * Kimberly Haley is new to the verification process and completed it correctly. She should be commended for being successful in this complicated task.
- * Airline Community School and Cook Kathy Cobb must be commended on their commitment to scratch cooking for students. Kathy bakes a lot of items from scratch using a blend of whole grain and enriched flour. This is not the norm in schools and should be celebrated.
- * Airline Community School staff exercised nice engagement with students. It is clear they care about their school community.

Technical Assistance

- * Technical Assistance was provided on the need to use SY 2020 income guidelines when approving applications. The guidelines and instructions were emailed to Principal Bryan and Administrative Assistance Kimberly Haley on October 31, 2019.
- * Technical Assistance was provided on the need to convert multiple income frequencies listed on meal benefit applications to an annual income for approval. In addition, if seasonal income is listed, duration should be clarified with the household as this may impact the outcome of the application's approval status.
- * Technical Assistance was provided on the need to ensure the Paid Lunch Equity Tool for next school year is updated to reflect current meal charging amounts. The current amount listed is less than what the district charges.
- * Technical Assistance was provided on the need to utilize the most up to date Federal and State of Maine Non-Discrimination Statements on program materials. These statements must also be included on the district's website. The statements and household notification templates have been provided.

Certification and Benefit Issuance - Airline CSD (1038)

135. Direct Certification lists retained on file by the SFA?

Finding: Direct Certification documentation is not kept on file at the SFA.

Lists were not available for view during the onsite visit. However, all DC students listed as receiving benefits on the master list were approved correctly.

Corrective Action:

Provide the reviewer with a plan to ensure DC lists are kept securely on file at the school. Information on these lists must be handled confidentially.

Deadline: January 10, 2020

Meal Counting & Claiming - Airline CSD (1038)

313. On-site observation validate Off-Site Assessment Tool responses to Meal Counting & Claiming questions?

Finding: Local Charge Policy and Unpaid Meal Policy Procedures

Airline Community School does not have a documented local charge policy nor unpaid meal policy procedures. This is a requirement.

Corrective Action:

Submission of the Local Charge Policy and Unpaid Meal Policy Procedures to your reviewer.



SNP Administrative Review Findings

Airline CSD (1038)

Program Year 2020

Deadline: March 31, 2020

General Program Compliance - Airline CSD (1038)

1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?

Finding: Local Wellness Policy is missing required elements

Airline Community School does not have a compliant Local Wellness Policy. In addition, it must be available online for public access.

Corrective Action:

Airline Community School must revise their wellness policy to include the following:

- Nutrition standards for all foods and beverages sold to students during the school day.
- Permit food and beverage marketing of only those foods and beverages that meet federal Smart Snack Guidelines.
- Plan for informing the public about the wellness policy, including implementation and results of policy review. A description of the plan for measuring the implementation of the wellness policy must be included.
- The wellness policy should be available online and include the last date it was updated.

Airline Community School must submit a compliant approved Local Wellness Policy as Corrective Action.

Deadline: March 31, 2020

Technical Assistance:

Technical Assistance was provided on the availability of a Local Wellness Policy template provided by Maine School Management Association. The most recent one available has been reviewed to ensure it meets all requirements. This can be customized to meet Airline Community School's needs.

1214. Validate OFS #1204 - Did the School Nutrition Director meet annual training requirements?

Finding: Professional Standard Requirements *Repeat Finding

Kathy Cobb is expected to receive 12 hours of training per year due to the responsibilities of her role. These hours can also be obtained by training other staff members. At the time of the onsite review, she had only obtained 0.5 hours and did not have a clear plan to obtain the remaining 11.5 hours. During the last Administrative Review, this was also a finding.

Corrective Action:

Submit a plan to obtain 12 hours of training by the end of the school year.

Deadline: January 10, 2020

Technical Assistance:

Technical Assistance was provided on availability of online training resources, as well as the Department of Education's calendar of events.



SNP Administrative Review Findings

Airline CSD (1038)

Program Year 2020

Airline Community School (1039)

19 School Street Orrington, ME 04474 **Food Service Contact**

Kathy Cobb Cook 2075843012

Month of Review: September 2019

Meal Counting & Claiming - Airline Community School (1039)

325. Review Period meal counts by category correctly used in the claim? Enter data.

Finding: School's meal counts by category not used correctly in the SFA's claim for reimbursement.

The SFA's claim for Airline Community School for the Review Period does not match the State agency's validated meal counts by category for the school for September 2019. In September, 2 breakfasts were under claimed (1 free and 1 paid) and 1 paid lunch was under claimed. This is likely due to the system of using a manual checklist at Point of Service, then transferring the counts to two separate checklists.

The May 2019 claim was also validated. While the SFA's meal counts on file matched the claim form, consolidation errors were noted when the forms were reviewed. While the discrepancies did not impact the final numbers reported, they appeared to be the same type of transposition error seen with the September claim.

Corrective Action:

As Corrective Action, a plan must be submitted to ensure counts are accurate. Ideas include streamlining the process to one spreadsheet or having the staff member filing the claim do validation review prior to filing. The manual checklist used at Point of Service does not identify student status which meets the requirement and helps maintain confidentiality.

Deadline: March 31, 2020

Meal Components & Quantities - Airline Community School (1039)

404. DOR - signage explaining reimbursable meal near/at beginning of service line?

Finding: No signage explaining what constitutes a reimbursable meal at beginning of service line.

As observed on the Day of Review, signage explaining what constitutes a reimbursable breakfast and lunch were not identified near or at the beginning of the meal service line.

Signage for lunch added during day of visit. This must be customized to explain what constitutes a reimbursable meal. In addition, signs must include the requirement to take 1/2 cup fruit or vegetable.

Corrective Action:

Submit a photo illustrating the signs have been placed.

Deadline: January 10, 2020

410. Review period menus and production records - Quantities and meal pattern requirements met?

Finding: Planned menus served during Review month do not meet portion size/quantity requirements.

Productions records were reviewed for the Review Period to determine whether the portion sizes of meal components from the planned menu and served during the Review Period meet the minimum meal pattern requirements for the age/grade groups being served. Based on the review of production records and other supporting food crediting documentation for September 9-13, 2019, some meals served during the week reviewed did not meet the appropriate daily meal pattern requirements. Lunch on Friday, September 13 had insufficient fruit; 1/4 cup fruit offered as only half of an orange provided. One whole orange credits as 1/2 cup.



SNP Administrative Review Findings

Airline CSD (1038)

Program Year 2020

Corrective Action:

Kathy Cobb must receive training on lunch meal pattern. Submit a description of how this training was obtained. In addition, submit one week of planned fruit servings for lunch to validate that fruit requirements will be met in the future.

Deadline: January 10, 2020

General Program Compliance - Airline Community School (1039)

1407. SFA written food safety plan implemented?

Finding: Food Safety *Repeat Finding

There were food safety concerns observed during the onsite review of Airline Community School.

- Temperature logs for potentially hazardous foods and equipment were not being maintained. This was also noted in the last Administrative Review. Internal thermometers must be used to measure proper equipment temperatures. Thermometer calibration logs must also be maintained to ensure thermometers used for food temperatures are accurate.
- Standard Operating Procedures (SOPs) were not customized. These also must be reviewed on an annual basis.
- Freezers must be organized and product used on a first in first out basis. Freezer inventory should be utilized to help with this effort. This would benefit the organization of items in the freezers, while also assisting with food cost management.
- Gloves were not consistently used when ready to eat foods were handled. Gloves must be used when ready to eat food is handled.
- The most recent health inspection must be posted for public view.

Corrective Action:

Corrective Action must include:

- Submission of equipment and food temperature logs for the month of December 2019. All refrigerators and freezers must have internal thermometers and temperature logs where the daily temperature is recorded. Logs should clearly identify which refrigerator/freezer they are for. In addition, thermometer calibration documentation for December 2019 must be submitted. Thermometers must be calibrated weekly. This can be maintained on a separate log or written on the production records.
- Documentation indicating the SOPs have been reviewed must be submitted. The time it takes to review can be counted towards Professional Standards requirements.

Deadline: January 10, 2020

Technical Assistance:

Technical Assistance was provided on site regarding the need to utilize gloves when handling ready to eat foods and place a copy of the health inspection for public view.

1411. Did any review of products indicate violations of the Buy American provision?

Finding: Buy American Provision

Pears in dry goods store room were a product of China.

Corrective Action:

For any item that can credit as a meal component, Airline Community School must purchase American products or maintain documentation on why the non-American product was obtained. Please submit a written plan to meet this requirement.

Deadline: January 10, 2020

Adriane Ackroyd, MPH, RD Child Nutrition Supervisor Adriane.ackroyd@maine.gov 207-624-6726