



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

JANET T. MILLS  
GOVERNOR

A. PENDER MAKIN  
COMMISSIONER

March 22, 2024

Derek Perkins  
Superintendent  
Penobscot Public Schools  
PO Box 630  
Blue Hill, ME 04614

Dear Superintendent Perkins:

The Penobscot Public Schools Nutrition Program was reviewed per Federal Regulation 7CFR 210.18 and Maine Department of Education Child Nutrition policies and procedures. On February 14, 2024 Stephanie Stambach reviewed Penobscot Elementary School. An exit conference with you occurred on February 15, 2024.

The enclosed Official Notification of 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 by the deadline(s) listed. 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

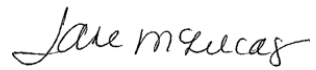
In accordance with §210.18(k), failure to return completed documentation within 30 days from the corrective action deadline date will result in the withholding of reimbursement payments. We hope that following the exit conference you and your staff addressed the corrective actions and that you will have 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 will 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 Stephanie Stambach at 215-9437 or email [stephanie.stambach@maine.gov](mailto:stephanie.stambach@maine.gov).

Sincerely,

A handwritten signature in cursive script that reads "Jane McLucas".

Jane McLucas  
Child Nutrition Director

JM/SS/pn



SNP Administrative Review Findings

Penobscot Public Schools (351)

Program Year 2024

Penobscot Public Schools (351)

PO Box 630
20 Hinckley Ridge Road
Blue Hill, ME 04614

Food Service Contact

Ms. Michelle Snowden
Administrative Assistant to
Superintendent
(207) 374-9927

Executive Contact

Mr. Derek Perkins
Superintendent
(207) 374-9927

No. of Sites / Reviewed: 1 / 1
Month of Review: January 2024
Date of on-site review: February 14, 2024

Introduction

- \* Thank you to Michelle Snowden and Sally Steele for assisting with the Penobscot Public Schools administrative review. We appreciated the time and assistance provided by the staff. Michelle is new to her role in the school nutrition program for School Union 93 and was quick to make any changes needed. Sally showed great customer service with students during meal service and was proactive in making changes prior to the on-site review. Michelle and Sally both share food service director duties in the program.
\* School Union 93 consists of five towns and five different head cooks. To assist with meeting professional standards hours and resource sharing, it was recommended that in-service/workshop days be provided to the school nutrition staff. This could involve menu and recipe sharing, reviewing production records, and discussing best practices/challenges.
\* Sally does a wonderful job completing the production records for breakfast and lunch. A nice variety of recipes and scratch cooking was used, and recipes were customized to what was actually used.

Technical Assistance

- \* Currently, students are served all meal components for breakfast and lunch. There were many unopened cereals and milks observed at breakfast. It was recommended to look into Offer vs. Serve, where students select three items for breakfast and three components for lunch, which helps to reduce food waste. The school could also implement a share table, for students to place any unwanted items. Share table guidance from DHHS was emailed to the Head Cook on the day of review.
\* Almond milk was used as a milk substitute for a student. This is an unallowable milk substitute as it does not have the same nutrient profile as cow's milk. A medical statement is needed for students with a food allergy and must include foods to omit and foods to substitute so kitchen staff know how to accommodate.
\* Students and teachers were observed in the kitchen, and it was found that they were getting snack milk from the cooler. A solution to this was to move the cooler outside of the kitchen to reduce foot traffic. Based on the Maine Food Code, only authorized individuals are allowed in the kitchen, such as servers and custodians. Posting a sign outside the kitchen may also help with this.
\* The adult meal price is \$6.50. Based on the SY 2023 annual financial report in CNP web, the average lunch per meal cost was \$8.33. This includes food, labor and other costs. The district should investigate what is causing the per meal cost to be high and increase the adult meal price as needed. Any amount that is not covered will need to come from another funding source, and the school nutrition program cannot absorb the cost. Steps to reduce overall food cost should be taken, including inventory control and using USDA foods entitlement.
\* At the time of the review civil rights training hadn't been completed; however, was completed prior to the on-site review. Annual civil rights training must be completed by any staff with responsibilities in the school nutrition program.

General Program Compliance - Penobscot Public Schools (351)

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

Finding 1: Triennial assessment of local wellness policy not completed.

The wellness policy must be assessed every three years and is a federal requirement. A sample assessment tool can be found on the Child Nutrition website: https://www.maine.gov/doe/schools/nutrition/programs/nslp.

Corrective Action:

Complete assessment and upload results to CNP web- E Reviews- Corrective Action Responses.

Corrective Action Deadline: April 26, 2024

SNP Administrative Review Findings

Penobscot Public Schools (351)

Program Year 2024

Penobscot Elementary School (352) Food Service Contact

PO Box 630  
20 Hinckley Ridge Road  
Blue Hill, ME 04614

Month of Review: January 2024

Meal Counting & Claiming - Penobscot Elementary School (352)

322. Days when F/R/P meal counts exceed number of eligibles? Enter data.

**Finding 2: Meal counts by day are not being recorded and compared to edit checks**

Daily meal count records are needed to ensure there are appropriate edit checks, and meal counts are not exceeding enrollment. A spreadsheet of meal counts by day was given to the reviewer on the on-site review; however there also needs to be edit checks in place.

There is a "Daily Edit Check" template on the Child Nutrition website that can be used for meal counts: <https://www.maine.gov/doe/schools/nutrition/programs/nslp>. With Penobscot being Special Provision 2, non-base year, total counts can be entered in the "paid" category and compared to enrollment and the attendance factor.

**Corrective Action:**

Adopt meal count form that will be used to ensure daily meal counts are recorded and edit checks are in place. Upload to CNP web- E Reviews- Corrective Action Responses.

**Corrective Action Deadline: April 26, 2024**

Meal Components & Quantities - Penobscot Elementary School (352)

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met? Enter data.

**Finding 3: Review Period: Breakfast and lunch meal pattern errors found**

One week of menus and production records were reviewed for January 2024. The following meal pattern errors were found:

**Breakfast:**

- Non-whole grain rich items offered at breakfast. This led to not meeting the 80% weekly whole grain offering.
- Cereals were not all 1 oz equivalent.

**Lunch:**

- Missing legume vegetable subgroup
- Insufficient grain x 2 days. This led to not meeting the 80% weekly whole grain offering.
- Insufficient vegetable x 1 day.

The Head Cook made changes between the off-site portion of the review and day of review. Some grain items had already been switched over to a whole grain version, such as cereals and pancakes. Additional grain was also added to the lunch menu on the day of review to meet the minimum grain offering.



**Corrective Action:**

Upload breakfast and lunch production records for the week of February 26- March 1, 2024, to CNP web- E Reviews- Corrective Action Responses.

**Corrective Action Deadline: N/A; information has already been received.**

**Technical Assistance:**

Menu planning tips were provided to ensure that the daily and weekly requirements were being met. For example, with vegetable subgroups, planning each Monday as "legume" day to simplify menu planning.

Sincerely,

Stephanie Stambach MS, RD, SNS  
Child Nutrition Supervisor  
[stephanie.stambach@maine.gov](mailto:stephanie.stambach@maine.gov)  
207-215-9437