



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

JANET T. MILLS  
GOVERNOR

A. PENDER MAKIN  
COMMISSIONER

April 5, 2019

Mark Hurvitt  
Superintendent  
Blue Hill Public Schools  
PO Box 630  
Blue Hill, ME 04614

Dear Superintendent Hurvitt:

An Administrative Review of the Blue Hill Public Schools Nutrition Program was conducted on March 12, 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 May 31, 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 Adriane Ackroyd at 624-6726 or email [Adriane.ackroyd@maine.gov](mailto:Adriane.ackroyd@maine.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read 'Walter Beesley', written over a horizontal line.

Walter Beesley  
Child Nutrition Director

WB/AA/pn

Enclosure

**Administrative Review Report**  
**Blue Hill Consolidated School Nutrition Program**  
**March 12, 2019**

***Introduction***

The Blue Hill Consolidated School Nutrition Program was reviewed 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-** One hundred eligible students were reviewed. Overall, applications were in good order. However:

- One meal benefit application was missing the last four digits of the social security number. Technical Assistance was provided on the need to ensure all required data is provided and the data was obtained during the on-site visit.
- Technical Assistance was provided on the need to convert multiple income frequencies to an annual figure to verify eligibility.

**Verification-** Was completed on time, however there were a few errors. Corrective action is required.

- Net income was used in the calculations rather than gross. Gross income must always be verified. In addition, incorrect conversions were used. Multiple income frequencies must be converted to an annual figure.
- The final notification letter sent to the household did not include a sent date so the reviewer was unable to verify that the correct timeline was used for a reduction of benefit.

**Meal Counting and Claiming-** Corrective action is required.

- When the January 2019 claim was validated, 100 paid lunches were over claimed and 10 free lunches were over claimed. The claim has already been adjusted.
- On the day of onsite meal observation, there was inconsistent accountability at the end of the service line. There was a staff member out sick during the service which impacted staffing. The district must ensure there is consistently a person monitoring the card accountability system at the end of the line as students can make errors in which container they drop their cards in (milk only versus full meal). In the future, this could be a finding with corrective and/or fiscal action.

***Performance Standard 2: Meal Pattern and Nutritional Quality***

**Meal Components and Quantities-** Corrective action is required

- There was insufficient fruit served Friday of the review week for breakfast and on Thursday of the review week for lunch. This was because one clementine was offered rather than two.



- Pre-K students are served breakfast in their classroom. Bagged breakfasts are made ahead of time and picked up. As the students are eating in a separate area than the remaining students, the Child and Adult Care Food Program Pre-K meal pattern must be followed for breakfast. Guidelines were provided to the Food Service Director, Tim Cyr.
- **Production Records:** Production records are used to support the claiming of meals and therefore, must document the items offered and quantities served as part of a reimbursable meal. When February and March production records were reviewed onsite, it was observed that some days were not completed correctly. At times, significant amounts of information were missing. However, the review week was completed correctly. In the future, fiscal action could be taken if production records do not illustrate that meal pattern is being met. Tim Cyr is interested in consolidating some of the paperwork requirements. Currently, he does an electronic production record and a handwritten one. Completing only one production record is a good way to streamline work and leads to fewer errors.

### ***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 \$62,446.86 is not included in our comparison of expenses to revenue below:

<b>SY 2018</b>	<b>Target</b>	<b>Actual</b>
Percentage of Food to Total Revenue	35-40%	47.63%
Percentage of Labor to Total Revenue	50-55%	104.26%
Percentage of Other to Revenue	<u>5-10%</u>	<u>11.35%</u>
	100%	163.24%

Food, labor, and other costs are high. Increasing participation in the breakfast and lunch programs increases revenue, which will assist in reaching the above recommended ranges.

**Meal Charging-** Blue Hill Consolidated School communicates their payment policy with families in the student handbook. Technical Assistance was provided on best practices for meal charging procedures and the need to consider methods to address any future unpaid meal debt. School Union 93, which provides administrative support to the school, is currently reviewing their procedures.

### ***General Program Compliance***

**Smart Snacks Competitive Foods Rule-** The 100% juice in the beverage vending machine is too large of a serving to be accessible to the elementary aged children (pre-k through 5<sup>th</sup> grade). Elementary schools may sell up to 8-ounce portions. Corrective action is required.

**Civil Rights-** The notification letters sent to families regarding meal benefits and verification contained an outdated Maine Civil Rights statement. Updated templates have been provided. Corrective action is required.

**Wellness Policy-** The wellness policy was reviewed and the following elements were missing:

- Standards and nutrition guidelines for all foods and beverages available during the school day that are consistent with Federal regulations. In the Blue Hill Consolidated School policy, an outdated policy is referenced.
- Policy for food and beverage marketing consistent with Maine statute §6662 (3) Food and beverage advertising.

Corrective action is required.

**Training/Professional Standards-** Tim Cyr is working towards meeting his Professional Standards training hours. At the time of the visit, the required hours had not been obtained, but Tim verified that he had a plan to complete them.

**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.

### Summary

Staff at Blue Hill Consolidated School work hard to ensure children receive a lovely variety of foods. On the days of visit, the meal was appetizing and many students expressed excitement over the offerings. The salad bar is robust and well utilized. Staff welcomed feedback and have been a pleasure to work with during the review process.

Sincerely,



Adriane Ackroyd  
Child Nutrition Consultant



## Official Notification of Review Findings and Required Corrective Action

**Local Education Agency:** Blue Hill Consolidated School

**Local Education Official:** Mark Hurvitt

*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.**

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**Finding 1 – Performance Standard 1: Verification –** *Verification was completed on time but had errors.*

Corrective Action: Staff responsible for verification must review Maine Department of Education verification training. Notify the reviewer when this has been completed.

Date Due: May 31, 2019

Estimated Fiscal Action: None

**Finding 2 – Performance Standard 2: Meal Counting and Claiming –** *In January 2019, 100 paid lunches were over claimed and 10 free lunches were over claimed.*

Corrective Action: Corrected; the January meal counts have already been adjusted and validated in NEO.

Date Due: Already corrected.

Estimated Fiscal Action: \$70.70 (Fiscal Action captured in the claim adjustment)

**Finding 3 – Performance Standard 2: Meal Components and Quantities -** *Menu documentation from the review period did not meet meal pattern requirements. Insufficient fruit was provided on one day for breakfast and on one day for lunch.*

Corrective Action: Submit a plan to ensure fruit servings are met for breakfast and lunch.

Date Due: May 31, 2019

Estimated Fiscal Action: None but could be calculated in the future.

**Finding 4 – Performance Standard 2: Meal Components and Quantities –** *Pre-K breakfasts must follow the CACFP meal pattern as the children are served in their classroom.*

Corrective Action: Submit a sample weekly breakfast menu to illustrate the meal pattern is met.

Date Due: May 31, 2019

Estimated Fiscal Action: None but could be calculated in the future.

**Finding 5 – General: Smart Snacks** – *The 100% juice in the vending machine at Blue Hill Consolidated School were not smart snack compliant as the portion was too large.*

Corrective Action: Describe how this violation has been corrected.

Date Due: May 31, 2019

Estimated Fiscal Action: None

**Finding 6 - General: Civil Rights** – *Notification letters contained an outdated Maine Civil Rights statement.*

Corrective Action: Updated templates have been provided. Submit copies of customized versions to the reviewer.

Date Due: May 31, 2019

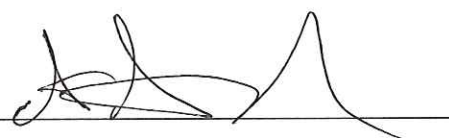
Estimated Fiscal Action: None

**Finding 7 - General: Local Wellness Policy** – *District does not have an approved, compliant wellness policy.*

Corrective Action: Submit a compliant policy that has been approved by the school board.

Date Due: May 31, 2019

Estimated Fiscal Action: None

Reviewer's Signature 

Date 4/5/19

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

1<sup>st</sup> Review  Revisit

Date Mailed to School/Institution Official 4/8/19

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

\_\_\_\_\_  
Signature of Local Education Agency Official

\_\_\_\_\_  
Superintendent  
Title

\_\_\_\_\_  
Date