



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

PAUL R. LEPAGE
GOVERNOR

ROBERT G. HASSON, JR., Ed.D.
COMMISSIONER

November 28, 2018

Craig Jurgensen
Superintendent
Jefferson Public Schools
767 Main Street 1-A
Damariscotta, ME 04543

Dear Superintendent Jurgensen:

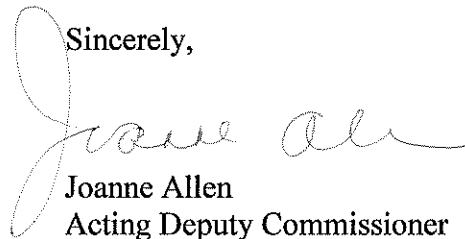
An Administrative Review of the Jefferson School Nutrition Program was conducted on November 6, 2018. We appreciated the assistance given by you and your staff.

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 within 45 days of the date of this letter.** 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,



Joanne Allen
Acting Deputy Commissioner

JA/SLS/sjs

Enclosure

cc: June Gallant

**Administrative Review Report
Jefferson School Nutrition Program
November 6, 2018**

Introduction

The Jefferson School Nutrition Program was reviewed. Jefferson Village 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

Certification and Benefit Issuance- Eligibility status from the prior school year must be carried over for the first 30 school days or until an application is received, based on federal regulation 7CFR 245.6. This was not followed and all status changes were made on September 30th. Technical assistance was provided to June Gallant, School Nutrition Director.

There were sixteen students who were listed as free and one student as reduced on the master eligibility list without documentation to support the meal benefits. It was discovered in Nutri Kids that all students were changed to free or reduced on October 1st without an application on file or verification that the children were found on the Direct Certification (DC) list. As a result of this incorrect reporting of free and reduced students, corrective action is required and fiscal action will be assessed for the meals that were incorrectly claimed at the free or reduced rate and should have been full pay.

Kathryn Higgins, administrative assistant, approves the meal benefit applications and then Lynsey Johnston, school principal, signs off on them. At the time of the review, Kathy had access to the Direct Certification (DC) list. The Maine Department of Education has an agreement with the Department of Health and Human Services, which generates the list, that only food service directors and superintendents can have access to maintain student confidentiality. DC list privileges have been changed so only June Gallant, School Nutrition Director and the superintendent have access.

All meal benefit applications are approved by the school level staff and then sent to June Gallant at the central office to enter the eligibility status into Nutri Kids. The same information is also being entered into Power school by the administrative assistant at each school for economic status purposes, which doubles the work. As recommended during the previous review, the application approval process should be moved to the central office to maintain student confidentiality and to streamline the process.

Verification- No findings.

Meal Counting and Claiming- No findings.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- A non-whole grain taco shell was served for lunch during the week of review. Technical assistance was provided and the taco shell will not be counted as a

grain component. Some menu substitutions were made; however, it did not result in any meal pattern findings. It was recommended that all AOS 93 kitchen managers be provided a list of products they could purchase to meet the meal pattern and to improve consistency among all schools. This was also mentioned during the previous review.

Production Records: No findings. The kitchen staff maintains well organized and thorough production records.

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 \$15,289.00 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	36.47%
Percentage of Labor to Total Revenue	50-55%	82.36%
Percentage of Other to Revenue	<u>5-10%</u>	<u>7.32%</u>
	100%	126.15%

The September 2018 claim for reimbursement was reviewed and it was found that the June subsidy had not been reported. This is important so that the fund balance in the school nutrition account is correct. The September claim has since been revised and no further action is needed.

Paid Lunch Equity (PLE)- The program has complied with the PLE requirement by using non-federal funds to offset the need to increase paid lunch prices.

Meal Charging- The School Nutrition Program has a charging policy/procedure, as required.

General Program Compliance

Records and Record Keeping- Reports are submitted to the State Agency in a timely fashion and program records are kept for three years, as required.

Food Safety and Sanitation- No findings.

Civil Rights- An incorrect nondiscrimination statement was used on notification letters sent to families regarding meal benefits. The full, correct statement can be found on the Child Nutrition website. This is a repeat finding from the previous review.

Any staff with responsibilities in the school nutrition program must attend annual civil rights training. This includes Kathy Higgins, administrative assistant, who approves the applications and Lynsey Johnston, who is listed as the approving official in NEO. Training will need to be completed as part of corrective action.

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

- Goals for other school-based activities to promote student wellness
- 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 is required for the missing components. It was recommended that nutrition promotion have its own heading for ease when assessing nutrition promotion goals, which is required every three years.

Training/Professional Standards- Both kitchen staff met their required training hours for SY 2018. As School Nutrition Director, June Gallant has met the required training hours. It was recommended for all AOS 93 kitchen staff to meet regularly to discuss different topics such as proper menu substitutions, recipes and production records, which can be counted towards the professional standards hours. Michelle Miller, kitchen manager, keeps excellent production records and could provide tips to the other managers.

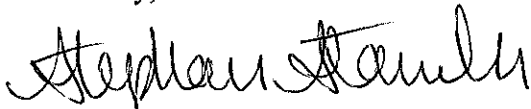
Corrective Action- Corrective action is required as a result of this Administrative Review. The enclosed form outlines what is required. A detailed response and documentation of the corrective action must be returned to our office by the date specified, along with the enclosed form signed by the Superintendent.

Findings- As part of the Healthy, Hunger Free Kids Act of 2010, review findings must be posted and made available to the public by federal law. This can include posting the review report on the district website or making it available at a public hearing or school board meeting.

Summary

The improper certification of meal benefits needs to be addressed immediately. Other aspects of the Jefferson School Nutrition Program are running particularly well. The kitchen staff is knowledgeable about program requirements and the cafeteria is an inviting place to eat. There was beautiful artwork on the serving line created by the kitchen manager, which was a unique and fun way to communicate the menu offerings to students. Keep up the good work.

Sincerely,



Stephanie Stambach MS, RD, SNS
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Jefferson Public Schools

Local Education Official: Craig Jurgensen

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*

Multiple free and reduced students without documentation to support meal benefit status

Corrective action 1: Submit completed applications or documentation that all statuses have changed to full pay

Date Due: Within 45 days of date on enclosed letter

Estimated Fiscal Action: \$1,061.09

Finding 2 – General: *Civil Rights*

School staff with responsibilities in the nutrition program have not participated in annual civil rights training

Corrective action: Submit training documentation with signatures and dates

Date Due: Within 45 days of date on enclosed letter

Estimated Fiscal Action: None at this time

Finding 3 - General: *Wellness Policy*

Wellness policy missing the required elements

Corrective action: Update wellness policy and send the final, approved version to the reviewer.

Date Due: 60 days

Estimated Fiscal Action: None at this time

Reviewer's Signature Stephan Stanley Date 11/29/18

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

X 1st Review Revisit

Date Mailed to School/Institution Official 11/29/18

Submit to: Maine Department of Education
Child Nutrition
136 State House Station
Augusta, ME 04333-0136

Send Response no later than Within 45 days of date on enclosed letter

	Superintendent	
_____ Signature of Local Education Agency Official	_____ Title	_____ Date