



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

JANET T. MILLS  
GOVERNOR

A. PENDER MAKIN  
COMMISSIONER

April 10, 2019

Kevin Jordan  
Superintendent  
MSAD 46  
175 Fern Road, Suite 1  
Dexter, ME 04930

Dear Superintendent Jordan:

An Administrative Review of the MSAD 46 School Nutrition Program was conducted on March 28, 2019 & April 3, 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 10, 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 Sarah Platt at 624-6879 or email [sarah.d.platt@maine.gov](mailto:sarah.d.platt@maine.gov).

Sincerely,

Walter Beesley  
Child Nutrition Director

WB/SP/pn

Enclosure

**Administrative Review Report  
MSAD 46 School Nutrition Program  
March 28 & April 3, 2019**

***Introduction***

The MSAD 46 School Nutrition Department was reviewed. Ridge View Community School was selected to represent the district 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 documentation was reviewed for a random sampling of 358 students receiving free and reduced-price meal benefits. There was one application error where two students had been incorrectly approved for meal benefits. Documentation was not on file for 17 students that were receiving meal benefits. The benefit issuance system, PowerSchool, did not identify that a change in meal benefits needed to be activated. In situations when a household will receive a decrease in meal benefits, this change is made after a grace period. The current system relies on a person to remember to manually make the change after the grace period, lending itself to error. The errors were from failing to terminate benefits after the 30-day carryover requirement and a benefit change as a result of the verification process. A better system needs to be put in place to make sure benefits are only provided to those who are eligible for meal benefits. Corrective action is required.

When a student is certified for meal benefits, the benefit must be extended to other students in the same household. The current benefit issuance system, PowerSchool, does not identify additional students in the same household. Nancy Price, Food Service Director, does her best to find out which students are in the same household, but it is not a thorough or efficient process.

**Verification-** The verification process was completed correctly with the exception for making the eligibility change in PowerSchool for two households losing meal benefits. As explained above, the error was in failing to make the eligibility change on the specific date after the grace period.

**Meal Counting and Claiming-** Meal counts from the January & February 2019 District Claim for Reimbursement were validated and meals were claimed correctly.

Meal counts are taken electronically using PowerSchool at the end of the service line. Daily counts are then recorded manually to ensure accuracy when claiming meals for reimbursement. This is because when eligibility changes are made, PowerSchool makes the change retroactive. Therefore, the meal count reports in PowerSchool are not correct. It would be more efficient to have a mechanism in place that did not allow PowerSchool to make the eligibility change retroactive.

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

**Meal Components and Quantities-** Meal pattern documentation for the breakfast and lunch program was reviewed. Lunch production records did not contain enough detail to support the

quantity of products prepared and leftover on the salad bar. One lunch meal did not meet the whole grain rich requirement or the minimum amount of grain requirement. For the breakfast program, the minimum amount of grain was not met with some of the cereal choices. Production records were missing serving sizes of the items offered. Technical assistance was provided on-site and staff were receptive. Corrective action is required.

***Resource Management***

For SY 2018, revenues and expenses were obtained from the Monthly Income and Expenses report found in NEO. Town/district appropriation in the amount of \$28,656.17 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%	35.6%
Percentage of Labor to Total Revenue	50-55%	63%
Percentage of Other to Revenue	<u>5-10%</u>	<u>4.1%</u>
	100%	102.7%

**Paid Lunch Equity (PLE)**- The program has complied with the PLE requirement.

***General Program Compliance***

**Buy American**- Canned tuna fish was not compliant with the Buy American provision, however was supported by documentation of the price differential exception.

**Civil Rights**- Eligibility and verification notification letters need to be revised to reflect the current Federal and State non-discrimination statements. This was corrected prior to the review and verified by the reviewer.

**Wellness Policy**- The wellness policy was reviewed and needs to be revised to include the following elements:

- Standards for foods and beverages sold during the school day that are consistent with Federal smart snack regulations
- Standards for foods and beverages provided, not sold, to students during the school day such as during classroom celebrations and foods used as a reward
- Permit food and beverage marketing of only those foods that meet Federal smart snack regulations

Corrective action is required.

***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*

The MSAD 46 School Nutrition Department is running well but improvements are needed to ensure the correct meal benefits are provided to students. Program staff were receptive to feedback and quick to correct findings. I appreciate the time and effort provided to me throughout the review process.

Sincerely,

A handwritten signature in cursive script that reads "Sarah Platt".

Sarah D. Platt, RD, SNS  
Child Nutrition Consultant

**Administrative Review  
Official Notification of Review Findings and Required Corrective Action**

**Local Education Agency:** MSAD 46

**Local Education Official:** Kevin Jordan, Superintendent

**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: Certification and Benefit Issuance – *One application incorrectly approved for reduced-price meal benefits.***

Corrective Action: Notify the household of the error and change their meal benefits to ‘Paid’ after 10 calendar days. Submit an eligibility report from the benefit issuance system as documentation.

Date Due: May 10, 2019

Estimated Fiscal Action: \$105.54

**Finding 2 – Performance Standard 1: Certification and Benefit Issuance – *Meal benefits were incorrectly provided to 17 reviewed students without supporting documentation on file.***

Corrective Action: Notify the households of the error and change their meal benefits to ‘Paid’ after 10 calendar days. Submit an eligibility report from the benefit issuance system as documentation.

Corrective Action: Describe the mechanism that has been put in place to correct this finding from recurring.

Date Due: May 10, 2019

Estimated Fiscal Action: \$ 1,031.53

**Finding 3 – Performance Standard 2: Meal Components and Quantities - *Meal pattern violations (non-whole grain rich, insufficient grain, incomplete production record)***

Corrective Action: Submit 5 consecutive days of completed lunch production records and corresponding product labels.

Date Due: May 10, 2019

Estimated Fiscal Action: None at this time

**Finding 4 - 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: June 30, 2019

Estimated Fiscal Action: None at this time

**Finding 5 - General: Civil Rights - Program letters did not contain the current Federal and State non-discrimination statements.**

Corrective Action: Corrected prior to the onsite review.

Date Due: N/A

Estimated Fiscal Action: None at this time

Reviewer's Signature         *Janah Platt*         Date         4/10/2019        

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

    X     1<sup>st</sup> Review             Revisit

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

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

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

Superintendent