



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
Penobscot Public Schools
PO Box 630
Blue Hill, ME 04614

Dear Superintendent Hurvitt:

An Administrative Review of the Penobscot Public Schools Nutrition Program was conducted on March 13, 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.

Sincerely,

A handwritten signature in blue ink, appearing to read "Walter Beesley".

Walter Beesley
Child Nutrition Director

WB/AA/pn

Enclosure

**Administrative Review Report
Penobscot Community School Nutrition Program
March 13, 2019**

Introduction

The Penobscot Community School Nutrition Program was reviewed. This 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- Corrective action is required.

- Two meal benefit applications were approved incorrectly. One application with three students in the household was approved for free benefits, but should have been reduced based on income guidelines. The second application was missing the last four digits of the social security number. This was obtained during the onsite review and was corrected.
- There was no back-up documentation to verify reduced price eligibility of one student.

The error percentage for applications is 10%, which requires Penobscot Community School to implement an "Independent Review of Applications" next school year (2020). This process is a second review of all eligibility determinations made by the original determining official (Principal Corbin) by someone other than the determining official. This person can be an employee of Penobscot Community School but must be trained on how to make supplication determinations.

Principal Jay Corbin is responsible for applications and verification and is new to the processes. Technical Assistance was provided on the 30 day carryover requirement as Penobscot Community School's process for this was not clear. Technical Assistance was also provided on the correct date to use for eligibility changes.

Verification- Was not completed correctly. Corrective action is required.

- A Direct Certification household was improperly selected for verification.
- All required documentation was not maintained on file, including all letters notifying the household during the process.
- Net income was used for calculations rather than gross income.

Meal Counting and Claiming- Corrective action is required.

On the February 2019 Claim for Reimbursement, one paid lunch was counted for reimbursement incorrectly. The claim has already been adjusted and corrective action is complete.

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 \$34,939.31 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	96.75%
Percentage of Labor to Total Revenue	50-55%	126.28%

Percentage of Other to Revenue	<u>5-10%</u>	<u>9.9%</u>
	100%	232.93%

Food and labor costs are high. Increasing participation in the program can assist in bringing the percentages closer to the recommended ranges. However, small schools typically have more difficulty breaking even due to enrollment levels. Head Cook Lisa Cloukey utilizes USDA commodities to help manage food costs. She also incorporates scratch cooking, which can increase costs but also improves meal quality.

Meal Charging- Penobscot 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

Civil Rights- Corrective action is required.

- The notification letters sent to families regarding meal benefits and verification must contain both the federal and State of Maine non-discrimination statements. Updated templates have been provided to Principal Corbin. Corrective Action is required.
- Staff members in charge of applications, verification and the Point of Service meal counting system must receive USDA Civil Rights training on an annual basis. Principal Corbin and Marty Clark, school secretary, must receive the training.

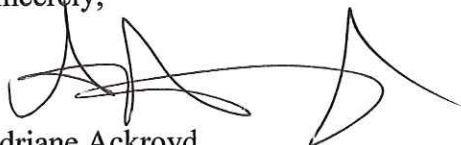
Training/Professional Standards- At the time of the onsite review, Lisa needed 10 more hours of training. She has a plan to meet the standards by reviewing webinars.

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 Penobscot Community School clearly care for the students. Lisa is a wonderful cook with a great rapport with the children. She is extremely organized, keeps a clean kitchen, and is very well versed in the regulations. On the day of the onsite visit, a student volunteer assisted in serving lunch. Excellent food safety practices were implemented; it is a great learning opportunity. Marty did a great job with the Point of Service meal accountability. Principal Corbin is eager to learn correct processes and with more training will succeed.

Sincerely,



Adriane Ackroyd
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Penobscot Community 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.

Finding 1 – Performance Standard 1: Certification and Benefit Issuance – *One application was incorrectly approved for free benefits when it should have been reduced. Additionally, one student received reduced price meal benefits with no documentation on file.*

Corrective Action: Notify households of the benefit change (as a reminder, when students lose a benefit, the household must be given 10 calendar days of notice of the benefit change), change the student status according to timeline requirements, and submit copies of the letters to the reviewer. As Principal Corbin is new to application approvals, he would benefit from training.

Date Due: May 31, 2019

Estimated Fiscal Action: \$47.15

Finding 2 – Performance Standard 1: Verification – *Verification incorrectly completed.*

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 3 – Performance Standard 2: Meal Counting and Claiming – *Invalid meal counts used on the claim for reimbursement.*

Corrective Action: This has already been corrected. The February claim has been revised.

Date Due: Completed

Estimated Fiscal Action: \$0.37 (captured in the claim adjustment)

Finding 4 – General: Civil Rights - *Notification letters did not contain the full federal and State of Maine non-discrimination statements.*

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 5 - General: Civil Rights – *Jay Corbin and Marty Clark have not received Civil Rights training.*

Corrective Action: Review the Maine Department of Education Child Nutrition Civil Rights training and send reviewer a screenshot of the completed webinar with signature and date of completion.

Date Due: May 31, 2019
Estimated Fiscal Action: None

Reviewer's Signature  Date 4/15/19

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

1st 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