



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

February 20, 2019

Jonathan Normand
Superintendent
Spurwink School Inc.
901 Washington Avenue
Portland, ME 04103

Dear Superintendent Normand:

An Administrative Review of the Spurwink Schools Nutrition Program was conducted on January 15, 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 March 22, 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 Stephanie Stambach at 624-6732 or email stephanie.stambach@maine.gov.

Sincerely,

Joanne Allen
Director of School Finance & Operations

JA/SS/pn

Enclosure

**Administrative Review Report
Spurwink School Nutrition Program
January 15, 2019**

Introduction

The Spurwink Nutrition Program was reviewed. Spurwink- Chelsea 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- Meal benefit applications were reviewed for the three Spurwink locations- Chelsea, Lewiston/Auburn and Glickman Academy. At Chelsea, there were three applications that were approved incorrectly. Two students were approved for free meal benefits when they should have been reduced. This was due to using the reduced income guidelines to certify the students for free meals when the free income guidelines should have been used. Another application was denied when it should have been approved for free meals as a SNAP number was listed. Technical assistance was provided to Jackie, the approving officer, that a SNAP number overrides the income that is submitted on the application.

There were two applications that needed more follow up. One student was listed as free but did not have a current application on file; the application was from School Year 2018. Another student goes to school at Spurwink but is a resident of the Becket House. An email or other documentation from the Becket House is needed to confirm that the student is residing there.

No errors were found with the Lewiston/Auburn and Glickman Academy applications.

Verification- Walter Beesley, Child Nutrition Director for the Maine Department of Education, is listed as the hearing official on the verification letters. The hearing officer must be a staff member within Spurwink who handles appeals. Nancy Lestage is listed as the hearing official in NEO; therefore this must be reflected on the verification letters.

Meal Counting and Claiming- The lunch meal counts at the Chelsea office did not match what the home office had, which files the claim for reimbursement. An error was found in the original meal counts at the time of the review and the November claim was revised. It was recommended that a spreadsheet be used to compile the meal counts, rather than calculating by hand to reduce the potential for errors.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- Spurwink-Chelsea contracts with RSU 11 for their meals. Because Spurwink provides services to students up to grade 12, the menu must be planned to meet grades 9-12 menu planning standards. There were multiple days where the grade 9-12 meal pattern was not met, including the 1 cup fruit and vegetable offering, and insufficient grains and meat/meat alternates were noted on one occasion.

On the day of review only ½ cup of fruit was offered; therefore the 1 cup fruit offering for grades 9-12 was not met. The importance of ensuring portion sizes are met for the older students was

emphasized. There should be written communication between RSU 11 and Spurwink indicating a reimbursable meal is provided to all grades.

General Program Compliance

Food Safety and Sanitation- Temperatures must be taken and recorded for all foods offered for lunch to ensure the food is safe for students to eat. Currently, only temperatures of hot items are being taken. An infrared thermometer was used which is not appropriate for taking food temperatures as it only measures the surface temperature and not the internal temperature. It was recommended to purchase a stemmed thermometer that can be calibrated or a digital food thermometer. The staff responsible for taking temperatures and distributing the meals asked questions and were interested in learning the correct process.

Written standard operating procedures have been developed; however a copy was not maintained at the Chelsea location. These are a written guide for staff who are involved in the meal service with steps to follow proper food safety and sanitation practices, including taking temperatures and personal hygiene.

Civil Rights- The “And Justice for All” poster was not posted as required. A copy was provided to the Education Director on the day of review. All staff with responsibilities in the school meals program is required to attend annual civil rights training. The Child Nutrition office has a webinar that staff can view to meet this training; a link to the webinar was emailed to program staff.

On-Site Monitoring- The required on site monitoring forms had not been completed at the time of the review but have since been emailed to the reviewer. These must be completed prior to February 1st of each school year.

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 available 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.
- A designated district official(s) to ensure school(s) comply with policy.

Training/Professional Standards- Staff that have responsibilities in the school nutrition program are not required to meet certain training hours each year; however they must receive training in the areas they are responsible for. The approving officer would benefit from additional training on how to approve free and reduced meal applications. The Child Nutrition office has a webinar on this topic that can be viewed. In addition to application approval, there are webinars on various topics that other staff may find helpful.

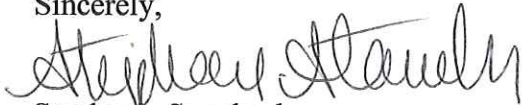
Corrective Action- Corrective action is required as a result of this Administrative Review. The enclosed form outlines what is required. A detailed response and documentation of the corrective

action must be returned to our office by the date specified, along with the enclosed form signed by Jonathan Normand.

Summary

The staff at Spurwink-Chelsea was a pleasure to work with and showed a desire to learn the requirements of the program. I am confident that with time and additional training the program will be in compliance with all requirements. It was a pleasure to review this program and I look forward to working with you in the future.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Stephanie Stambach'.

Stephanie Stambach

Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Spurwink

Local Education Official: Jonathon Normand

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*

Three application errors noted and two applications needing follow up.

Corrective action 1: Notify reviewer once status changes have been made for the application errors.

Corrective action 2: Submit current year application to the reviewer and documentation that the other student resides at the Becket House.

Date Due: March 22, 2019

Estimated Fiscal Action: \$12.00

Finding 2 - Performance Standard 1: *Verification*

Incorrect hearing official is listed on the verification letters

Corrective action: Submit updated letter to reviewer.

Date Due: March 22, 2019

Estimated Fiscal Action: None at this time

Finding 3- Performance Standard 1: *Meal Counting and Claiming*

Meal counts for November 2018 did not match the claim form

Corrective action: Submit plan for accurate meal counting and communicating errors in the future

Date Due: March 22, 2019

Estimated Fiscal Action: None at this time

Finding 4 – Performance Standard 2: *Meal Pattern and Nutritional Quality*

Meal pattern requirements were not met for grades 9-12

Corrective action: N/A- lunch production records have already been received

Date Due:

Estimated Fiscal Action: None at this time; however repeat findings in future reviews may result in fiscal action

Finding 5 – General Program Compliance: *Food Safety and Sanitation*
Temperatures for all food items are not being taken and recorded correctly.

Corrective action: Submit food temperature logs for the month of February 2018.

Date Due: March 22, 2019
Estimated Fiscal Action: None at this time

Finding 6 – General Program Compliance: *Civil Rights*
Civil rights training has not been completed by staff with responsibilities in the school nutrition program.

Corrective action: Provide signatures and dates upon completion

Date Due: March 22, 2019
Estimated Fiscal Action: None at this time

Finding 7 – General Program Compliance: *Wellness Policy*
Wellness policy is missing the required elements

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

Date Due: March 22, 2019
Estimated Fiscal Action: None at this time.

Reviewer's Signature Stephan Stawley Date 2/20/19

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

1st Review Revisit

Date Mailed to School/Institution Official 2/21/19

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

Signature of Local Education Agency Official Title Date