



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

January 2, 2019

Nancy Naimey
Principal
St. James School
25 Graham Street
Biddeford, ME 04005

Dear Principal Naimey:

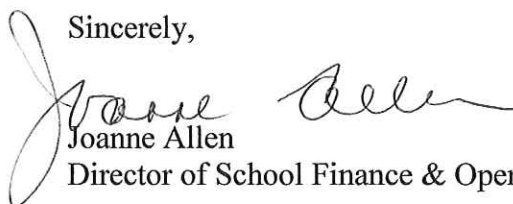
An Administrative Review of the St. James School Nutrition Program was conducted on December 11, 2018.

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 February 11, 2019 or as specified on the corrective action form.** 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.

Sincerely,



Joanne Allen
Director of School Finance & Operations

JA/SP/pn

Enclosure

**Administrative Review Report
St. James School Nutrition Program
December 11, 2018**

Introduction

The St. James 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- No findings.

Verification- No findings. Technical assistance was provided to document all correspondence pertaining to the verification process.

Meal Counting and Claiming- The number of eligible students was recorded incorrectly on the September 2018 Claim for Reimbursement. Meal counts were entered incorrectly on the September, October and November 2018 Claim for Reimbursement. The timeline for making a revision for the September claim has passed however the October and November 2018 claims have been revised to reflect the correct counts. A better system is needed to ensure accurate counting of reimbursable meals. Corrective action is required with this finding.

Although the reimbursement rate for free breakfast and reduced-price breakfast is the same amount, student meals must be recorded based on the eligibility the student has been approved for. Technical assistance was provided and this was corrected as part of the claim revision.

Meal counts must be recorded by student name. In the month of November, breakfast counts were recorded by name for students attending the before-care program. Additional students who ate breakfast was recorded by tic marks. Tic marks are an unallowable counting method and these meals were not included for reimbursement when the revision was done.

On the day of review, technical assistance was provided that the breakfast meal for one student could not be counted for reimbursement because, although fruit was offered to all students, one student did not select a half cup of fruit with his meal. Meal pattern training is needed for staff.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities-

School Breakfast Program – The breakfast meal pattern was difficult to assess because production record documentation was not available for the review month. Technical assistance was provided during the pre-review phone call that production records are a federal requirement used to support the claiming of meals for reimbursement. During the on-site review, invoices were reviewed and the meal pattern was validated. Corrective action is required with this finding.

School Lunch Program – Production records were available for the lunch program. Portion sizes are not consistently being recorded along with the amount prepared or available for service and amount served for each item. When portion sizes differ for various grade groups, each portion

size must be reflected on the production record. Production records need to contain the correct portion sizes to support the claiming of meals. Technical assistance on how to complete production records accurately was provided on-site. Corrective action is required for this finding.

Meal quality was excellent. The salad and deli bars offered a wide variety of fresh options and the program prepares items from scratch on a regular basis.

Resource Management

For SY 2018, revenues and expenses were obtained from the Monthly Income and Expenses report found in NEO to determine the following ratios:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	32.27%
Percentage of Labor to Total Revenue	50-55%	51.28%
Percentage of Other to Revenue	<u>5-10%</u>	<u>8.65%</u>
	100%	92.21%

Paid Lunch Equity (PLE)- The program is compliant with the PLE requirement.

Meal Charge Policy- The School Nutrition Program does not have a charging policy/procedure but is in the process of creating one. Corrective action is required for this finding.

Procurement- Procurement reviews are now completed separately from the Administrative Review. A report will be sent separately.

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.

Smart Snacks Competitive Foods Rule- St. James School sells milk and juice to students for snack. Both items were compliant with smart snack guidelines.

Food Safety and Sanitation- Temperature logs for all coolers need to be maintained daily. It was recommended to post a log to each cooler and designate a staff person to check and record cooler temps daily and notify a person in charge immediately if temperatures require attention.

Civil Rights- The annual required USDA Civil Rights training has not been completed. Corrective action is required for this finding.

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

- Policy for food and beverage marketing consistent with Maine statute §6662 (3) Food and beverage advertising
- A designated official to ensure the school complies with the policy

When revising the policy, reference to Chapter 51 should be removed, as Chapter 51 has been eliminated. Corrective action is required with this finding.

Training/Professional Standards- Training is needed for school nutrition staff. According to the USDA professional standards requirements, Yvette Trembley needs 12 hours of relevant training each year. Documentation must be maintained of all training. Debbie Yee, Robyn Michaud, and Dan Villemaire each need four hours every school year. Suggested training topics include civil rights, meal pattern, offer versus serve, production records and meal accountability. Training opportunities include monthly webinars hosted by Maine DOE Child Nutrition, online training opportunities, and face-to-face meetings hosted by the Maine School Nutrition Association and Maine Department of Education. Corrective action is required with this finding.

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

Yvette Tremblay is passionate about feeding students. She invests her time in providing quality meals, decorating the cafeteria to be an inviting place for students and providing great customer service to her students. To be compliant with Federal regulations and guidelines, better attention needs to be paid to required paperwork and documentation. Technical assistance was provided during the on-site review and we will continue to provide additional support as needed as she works to improve this area of the program. Please do not hesitate to contact our office for guidance as needed.

Sincerely,



Sarah D. Platt, RD, SNS
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: St. James School

Local Education Official: Nancy Naimey, Principal

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 returned along with the requested documentation that the review finding(s) has been corrected and this form is signed by the Local Education Agency Official. Failure to return complete documentation as requested may result in the withholding of reimbursement payments.

Finding 1 – Performance Standard 2: Meal Counting and Claiming – *Incorrect meal counts used on the September, October, and November claim for reimbursement.*

Corrective Action:

1. Revise October and November 2018 District Claim for Reimbursement with corrected meal counts and student eligibility. (Completed 12/19/18)
2. Provide a detailed response including the steps the district will take to ensure future compliance.

Date Due: February 11, 2019

Estimated Fiscal Action: To be determined

Finding 2 – Performance Standard 2: Meal Components and Quantities - *Production records from the review period were incomplete.*

Corrective Action:

1. Food Service Director must watch the Maine DOE Child Nutrition webinar on production records and submit documentation of doing so.
2. Submit one week's worth (five consecutive days) of completed breakfast and lunch production records to demonstrate compliance with production record requirements.

Date Due: February 11, 2019

Estimated Fiscal Action: None at this time

Finding 3 – General: Meal Charge Policy – *School Nutrition Program does not have a documented meal charge policy or procedure.*

Corrective Action: Submit a copy of the program's meal charge policy.

Date Due: February 11, 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 copy of a compliant, approved wellness policy.

Date Due: May 30, 2019

Estimated Fiscal Action: None at this time

Finding 5 - General: Civil Rights – Program staff have not completed the annual required USDA Civil Rights Training.

Corrective Action: Submit documentation that all program staff have completed the required USDA Civil Rights Training

Date Due: February 11, 2019

Estimated Fiscal Action: None at this time

Finding 6 - General: Professional Standards – Program staff are not on track to complete the annual required training.

Corrective Action: Submit documentation for program staff of completed and planned program training to ensure the minimum amount of required.

Date Due: February 11, 2019

Estimated Fiscal Action: None at this time

Reviewer's Signature Sarah Platt Date 12/28/2018

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

X 1st Review Revisit

Date Mailed to School/Institution Official 1/31/19

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

Signature of Local Education Agency Official

Title

Date