



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

JANET T. MILLS  
GOVERNOR

A. PENDER MAKIN  
ACTING COMMISSIONER

January 22, 2019

Emily Thompson  
Superintendent  
West Bath Public Schools  
126 New Meadows Road  
West Bath, ME 04530

Dear Superintendent Thompson:

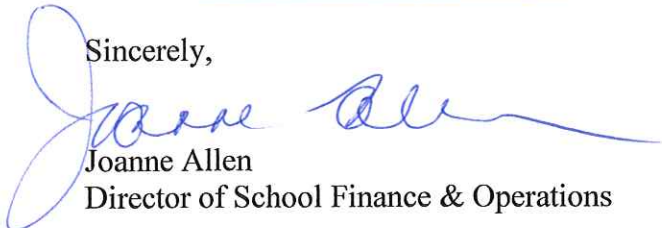
An Administrative Review of the West Bath Public Schools Nutrition Program was conducted on January 10, 2019.

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 April 26, 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](mailto:Adriane.ackroyd@maine.gov).

Sincerely,



Joanne Allen  
Director of School Finance & Operations

JA/AA/pn

Enclosure

**Administrative Review Report  
West Bath School Nutrition Program  
January 10, 2019**

***Introduction***

The West Bath School Nutrition Program was reviewed. West Bath 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** – One meal benefit application was approved incorrectly. The student was approved as reduced but should be free based on the income listed. Corrective action is required. Technical Assistance was provided on the following:

- If different income frequencies are recorded by the household, the income must be converted to annual and benefit assessed via the total annual income.
- If the household number listed and total number of names listed does not match, please confirm the correct number and document accordingly.
- If the student name is not listed, please verify the student name and document on the application accordingly.

**Verification** – Verification was not completed correctly.

- Verification was submitted past the required deadline of November 15<sup>th</sup>.
- The incorrect timeline was not used for the family selected for verification.
- The income calculation was not done correctly. The student's status was changed to reduced when it should have been changed to paid.

Corrective action is required.

**Hearing Official** – The Hearing Official and the Approving Officer is the same staff member, Principal/Superintendent Emily Thompson. The Hearing Official must be a different staff member than the person approving applications and conducting the verification process. 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 support in the amount of \$35,000 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%        | 59.08%        |
| Percentage of Labor to Total Revenue | 50-55%        | 111.12%       |
| Percentage of Other to Revenue       | <u>5-10%</u>  | <u>4.3%</u>   |
|                                      | 100%          | 174.5%        |

Food and labor costs are high, while other expenses are below the recommended range. Technical assistance was provided on site about techniques to manage food costs, including utilizing leftover items that have not been served at future meal services, rather than offering them as a free snack to students. Items such as packaged juices, fruits, and packaged grains that have not been served can be returned to storage and served at a later meal service. The program uses scratch cooking for some items, which increases labor costs and decreases food costs, as well as improves meal quality and, potentially, participation rates.

Consideration should be made to utilize kitchen staff for more food service administrative responsibilities. This would allow Principal Thompson to have more time for other non-food service duties. Increasing participation in meals increases revenue which improves labor and food cost percentages.

### ***General Program Compliance***

**Records and Record Keeping**- Reports and claims are not submitted to the State Agency in a timely fashion. Utilizing kitchen staff for more administrative responsibilities may assist in meeting required deadlines. The Superintendent must still approve the claim for reimbursement. The approval indicates that the claim preparer's work has been reviewed and is correct.

**Signage** – Signage indicating what constitutes a reimbursable breakfast was not posted in the cafeteria. Corrective action is required.

**Food Safety and Sanitation**- Health Inspection reports were displayed for public view and a sample lunch was available. Technical Assistance was provided on the need to consistently include a sample tray for breakfast items served. Written food safety Standard Operating Procedures (SOP) were on file. The school uses a checklist which is monitored daily to ensure compliance. Currently, documentation of stem thermometer calibration was not being conducted. SOPs include thermometer calibration. Thermometers must be calibrated weekly to ensure accurate readings. Accurate temperatures of potentially hazardous foods must be correctly documented. Corrective action is required.

**Civil Rights**- The full non-discrimination statement is not included on program materials; the Maine specific language is missing. Sample documents have been provided to the SFA that include the correct full non-discrimination statement. In addition, one kitchen staff member did not receive the mandatory Civil Rights training that is specific to Federal Child Nutrition programs. Corrective action is required.

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

- 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

Corrective action is required.

**Training/Professional Standards-** Professional Standards training hours were not met for employees with school nutrition program responsibilities at West Bath School. A tracking log was not available for review. A sample log was provided to staff and should be used for documentation. Wendy Morton will need a total of 4 hours, Jessie Sutfin will need a total of 6 hours, and Emily Thompson, who acts as the Food Service Director, will need 12 hours. Corrective action is required.

**Buy American-** Two products in the storeroom were not Buy American compliant. The West Creek kidney beans are a product of Canada and the Magellan sliced yellow peaches are a product of China. Items that can be credited as a meal component in Federal Child Nutrition programs must be a product of America. Exceptions include items that are not produced in sufficient quantities in the U.S. (bananas, mandarin oranges, etc.) or if the district can document that substitutions must be made due to financial hardship.

**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

West Bath incorporates scratch cooking into their program which is impressive. The homemade whole grain blueberry muffins served during breakfast smelled wonderful and garnered a lot of excitement from the students. The salad bar was colorful and included a nice variety of products. Wendy, who plans the menu, does an excellent job ensuring meal pattern is being met. In addition, all paperwork reviewed was well organized and easy to follow.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adriane Ackroyd', with a long, sweeping flourish extending to the right.

Adriane Ackroyd  
Child Nutrition Consultant

## Official Notification of Review Findings and Required Corrective Action

**Local Education Agency:** West Bath School

**Local Education Official:** Emily Thompson

*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.**

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**Finding 1 – Performance Standard 1: Certification and Benefit Issuance** – *One application was incorrectly approved. The student was receiving reduced price benefits when they should have been approved as free.*

Corrective Action: Update the student status in the POS meal benefit delivery system and notify the family of the change. Submit the date the correction was made and a copy of the notification letter to your reviewer as part of corrective action.

Date Due: April 26, 2019

Estimated Fiscal Action: TBD

**Finding 2 – Performance Standard 1: Certification and Benefit Issuance, Verification** – *Verification was not done correctly. The report was submitted past the required deadline of November 15, which is a repeat violation. The incorrect timeline was used. When proof of income was received, calculations were done incorrectly and the benefit was changed from free to reduced, when it should have been free to paid.*

Corrective Action: Notify the family of the benefit change and update the status in the POS meal benefit delivery system. In addition, verification training must be taken.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 3 – Performance Standard 1: Certification and Benefit Issuance** – *The Hearing Official and the Approving Officer is the same staff member, Principal/Superintendent Emily Thompson. The Hearing Official must be a different staff member than the person approving applications and conducting the verification process.*

Corrective Action: Revise the roles so that two separate staff members are utilized for these roles. Submit the planned changes as corrective action.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 4 - General: Signage** – *Signage indicating what constitutes a reimbursable breakfast was not posted in the cafeteria.*

Corrective Action: Submit a photo documenting that the sign has been posted.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 5 – General: Food Safety and Sanitation** – *Weekly thermometer calibration logs were not being maintained.*

Corrective Action: Submit one month's worth of weekly thermometer logs correctly completed.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 6 - General: Civil Rights** – *The full non-discrimination statement is not included on program materials; the Maine specific language is missing.*

Corrective Action: Submit a customized sample document indicating that the correct statement is being used.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 7 - General: Civil Rights** – *One staff member did not receive the mandatory Civil Rights training that is specific to Federal Child Nutrition Programs.*

Corrective Action: The staff member must review the Maine Department of Education Civil Rights webinar and notify the reviewer once it has been completed.

Date Due: April 26, 2019

Estimated Fiscal Action: None

**Finding 8 - General: 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: April 26, 2019

Estimated Fiscal Action: None

**Finding 9 - General: Professional Standards** – *Professional Standards training hours were not met for staff with school nutrition program responsibilities.*

Corrective Action: Submit a plan to complete the required professional standards training hours for staff with school nutrition program responsibilities at West Bath School. The plan must include the Civil Rights training for the kitchen staff member who did not obtain training and verification training for the staff responsible for verification. When the hours are completed, submit the tracking log as part of corrective action. Corrective action will be completed when all required hours have been obtained.

Date Due: April 26, 2019

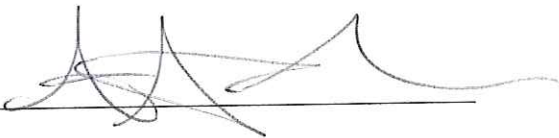
Estimated Fiscal Action: None

**Finding 10 - General: Buy American** – *Canned kidney beans were a product of Canada and canned sliced peaches were a product of China.*

Corrective Action: For any item that can credit as a meal component, West Bath School must purchase American products or maintain documentation on why the non-American product was obtained.

Date Due: April 26, 2019

Estimated Fiscal Action: None

Reviewer's Signature  Date 1/22/19

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

1<sup>st</sup> Review  Revisit

Date Mailed to School/Institution Official \_\_\_\_\_

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

Superintendent

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

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date