



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

March 6, 2023

Maria Libby
Superintendent
RSU 28
7 Lions Lane
Camden, ME 04843

Dear Superintendent Libby:

The RSU 28 Nutrition Program was reviewed on February 14, 2023 per Federal Regulation 7CFR 210.18 and Maine Department of Education Child Nutrition policies and procedures.

The enclosed Official Notification of Review Findings and Corrective Action describes the corrective action documentation required. Please submit a detailed response for each of the review findings listed in the report. Responses must be submitted through CNPweb, Maine Department of Education Child Nutrition's Administrative Review software, 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

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. 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.

Local Education Agencies have the right to appeal findings which impact their reimbursement. For more information visit <https://www.maine.gov/doe/sites/maine.gov/doe/files/inline-files/Child%20Nutrition%20Appeals%20Process.pdf>

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 215-9437 or email stephanie.stambach@maine.gov.

Sincerely,

A handwritten signature in cursive script that reads "Jane McLucas".

Jane McLucas
Child Nutrition Director

JM/SS/pn

SNP Administrative Review Findings**RSU 28/MSAD 28 (703)***Program Year 2023***RSU 28/MSAD 28 (703)**7 Lions Lane
Camden, ME 04843**Food Service Contact**Mikael Andersson
Food Service Director
(207) 236-7800**Executive Contact**Maria Libby
Superintendent
(207) 236-7800No. of Sites / Reviewed: 2 / 1
Month of Review: January 2023**Commendations**

- * Thank you to Mikael Andersson for assisting with the RSU 28 School Nutrition Program Administrative Review. Breakfast and lunch service was observed at Camden/Rockport Elementary School. We appreciated the time and assistance provided by the staff.
- * A review of student eligibility showed that all meal benefit applications were approved correctly. Keep up the good work!

Technical Assistance

- * Technical assistance was provided on-site to kitchen staff on the breakfast meal pattern and what constitutes a reimbursable breakfast under Offer vs. Serve. Staff would benefit from additional training to ensure understanding. This training could count towards the required annual professional standards hours.
 - * The non-discrimination statement listed on the eligibility notification letters and verification letters was missing the Maine non-discrimination statement. Technical assistance was provided.
 - * Staff who complete production records would benefit from more training on this topic. Some fine tuning of the production records is needed to ensure they accurately reflect what is being served. It was recommended to create a master template for items that are offered daily, such as milk and the self-serve bar to streamline paperwork.
- *RSU 28 has an agreement with the State Agency to operate under Special Provision 2. In the base year, SY2023, meal benefit applications are collected, and meal counts collected by student name and eligibility. For the next three years, through SY2026, meal counts will be taken, preferably by student name, and total meal counts entered on the claim. No meal benefit applications will be collected.

General Program Compliance - RSU 28/MSAD 28 (703)*1007. On-site observation validate Off-Site Assessment Tool responses to Local School Wellness Policy questions?***Finding 9000: Local wellness policy does not meet federal requirements**

The RSU 28 wellness policy was reviewed and compared to the federal requirements. The following elements were missing and will need to be added to be in compliance:

- Standards for foods and beverages sold to students during the school day
- Permit food and beverage marketing of only those foods and beverages that meet federal Smart Snack guidelines.

Sample language was provided to the Food Service Director to meet the requirements. The elements listed above were noted in the prior administrative review.

Corrective Action:

Revise local wellness policy and submit to reviewer for review. Upload the school board approved policy to CNPWeb- E Reviews- Corrective Action Responses.

Corrective Action Deadline: May 31, 2023

SNP Administrative Review Findings

RSU 28/MSAD 28 (703)

Program Year 2023

Camden-Rockport Elementary School Food Service Contact

(706)

7 Lions Lane
Camden, ME 04843

Month of Review: January 2023

Meal Counting & Claiming - Camden-Rockport Elementary School (706)

318. DOR - accurate meal counts by category at POS? Enter data.

Finding 9000: Meals Counted for Reimbursement Prior to Being Served to Students

During breakfast, a teacher was observed taking a meal for a student and the meal was claimed for reimbursement without the student being present. Meals may only be counted and claimed at the point when the student has received a reimbursable meal. There must be a process in place to ensure the meal is counted upon receipt, such as a student checklist or list of names that is returned to the kitchen.

Corrective Action:

Develop and implement an allowable meal counting and claiming procedure for claiming meals for students who are not able to come to the cafeteria to select their own meal. Describe this procedure on the Maine DOE Child Nutrition 'Alternate Service Location' form and submit via CNPweb.

Corrective Action Deadline: April 7, 2023

Meal Components & Quantities - Camden-Rockport Elementary School (706)

404. DOR - signage explaining reimbursable meal near/at beginning of service line?

Finding 9000: Breakfast signage was not posted at the beginning of the serving line

Signage explaining what constitutes a reimbursable breakfast, was not posted at the beginning of the serving line, as required. Sample signage was emailed to the Food Service Director.

Corrective Action:

Post signage and upload a photo to CNPWeb- E Reviews- Corrective Action Responses.

Corrective Action Deadline: April 7, 2023

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met? Enter data.

Finding 9000: Breakfast meal pattern errors

One week of breakfast menus and production records were reviewed. One cup of fruit must be offered each day and based on documentation, only 1/2 cup fruit was offered. On-site review confirmed more fruit options are offered; however, these must be documented. Milk choice was also not documented correctly and needs to reflect the options given.

There was one grain item offered for breakfast (French toast holes) that did not meet the minimum 1 oz equivalent grain. This has since been removed from the breakfast menu. Insufficient grain was noted in the prior administrative review.

Corrective Action:

Upload breakfast production records for March 13-17, 2023, to CNPWeb- E Reviews- Corrective Action Responses.

Corrective Action Deadline: April 7, 2023

SNP Administrative Review Findings
Program Year 2023

RSU 28/MSAD 28 (703)

409. Review period production records/documentation - required meal components offered, daily/weekly requirements met?
Enter data.

Finding 9000: Missing/insufficient vegetable subgroups offered for lunch

One week of lunch menus and production records were reviewed. It was found that a legume was missing, and insufficient dark/green vegetable offered. It was recommended to menu a different vegetable subgroup each day to streamline menu planning.

Repeat missing vegetable subgroups are subject to fiscal action in future reviews.

Corrective Action:

Upload lunch production records for March 13-17, 2023, to CNPWeb- E Reviews- Corrective Action Responses.

Corrective Action Deadline: April 7, 2023

General Program Compliance - Camden-Rockport Elementary School (706)

901. On-site monitoring review completed prior to February 1?

Finding 9103: On-site review of the school's meal counting and claiming procedures was not completed prior to February 1.

The SFA did not conduct on-site monitoring of the school's meal counting and claiming procedure prior to February 1 of the current school year. The monitoring forms were completed after the on-site review took place.

Corrective Action:

Complete on-site monitoring forms and upload to CNP web.

Corrective Action Deadline: N/A- this has been completed and no further action is needed.

Additional Notes/Considerations:

Food waste was brought up as a concern by both the Food Service Director and kitchen staff. Some consideration should be given to the following to address food waste:

- Implementing a share table at breakfast and lunch, where students can place unwanted packaged items, such as milk (as long as on ice), fruit with peeling, packaged dried fruit, etc. The current practice is to allow any student to take a milk or fruit at no charge if they do not want the meal, which is a cost to the food service program. Any student, whether eating school lunch or not, could select something on the share table. Updated share table guidance from DHHS was provided to the Food Service Director.

- Camden/Rockport Elementary School received a mealtime waiver to serve lunch before 10am. Due to the short length between breakfast and lunch this is likely contributing to waste. The waiver is only effective for this year and next year it would be in the best interest of the students to have lunch at a later time.

- There is a sense of urgency in getting the students through the line as quickly as possible. Staggering the lunches could result in less wait time for the students and would keep the lines moving more seamlessly.

- Currently, there is one lunch option available to students. Consideration could be given to a second lunch option for those that do not want the main meal and could reduce waste.

Sincerely,

Stephanie Stambach MS, RD, SNS
Child Nutrition Supervisor
stephanie.stambach@maine.gov
207-215-9437