



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

FEB 20 2015

cc: Scott  
Peter

PAUL R. LEPAGE  
GOVERNOR

THOMAS A. DESJARDIN  
ACTING COMMISSIONER

February 17, 2015

Meredith Nadeau  
Superintendent  
Cape Elizabeth Public Schools  
PO Box 6267  
Cape Elizabeth, ME 04107

Dear Superintendent Nadeau:

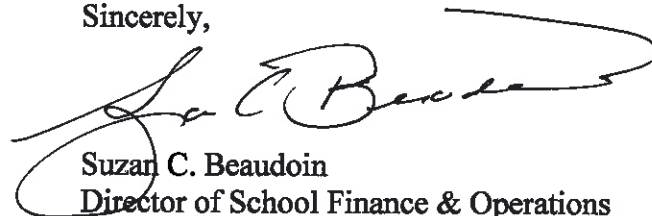
A Coordinated Review of Cape Elizabeth School Nutrition Program was conducted on February 3 & 4, 2015. We appreciated the assistance given by you and your staff.

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 20, 2015.** 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 (207) 624-6879 or email [sarah.d.platt@maine.gov](mailto:sarah.d.platt@maine.gov).

Sincerely,



Suzan C. Beaudoin  
Director of School Finance & Operations

SCB/SDP/sjs

Enclosure

**Administrative Review of the  
Cape Elizabeth School Nutrition Program  
February 3 & 4, 2015  
Coordinated Review Effort**

***Introduction***

The Cape Elizabeth School Nutrition Programs were reviewed. Pond Cove Elementary School (PCES) and Cape Elizabeth High School (CEHS) were selected to represent the district based on Federal Regulation 7CFR 210.11 and Maine Department of Education, Child Nutrition policies and procedures.

***Performance Standard 1***

**Certification and Benefit Issuance-** A statistical sample of 83 eligible students were reviewed to validate certification of meal benefits.

Five students from two households were incorrectly approved for meal benefits. Technical assistance was provided when approving meal applications with different frequencies of income listed; all income must be converted to annual income using the formulas listed on the meal application form. Peter Esposito, School Nutrition Director, corrected the meal benefits for all five students and a copy of the letter sent home to the family notifying them of the final benefit was given to the reviewer.

Verification is the process of validating a student's eligibility for free or reduced price meals. Districts must conduct verification between October 1 and November 20 of each year. A review of the Cape Elizabeth School Nutrition Program's verification shows that the correct method was used and that it was completed in the required timeframe. Documentation of letters sent to families for verification were not kept on file. Dated copies of individual letters must be kept for documentation.

**Meal Counting and Claiming-** The Cape Elizabeth School Nutrition Program uses the electronic Point of Service System, PCS, to count meals.

When verifying the number of meals claimed for reimbursement for December 2014, an error was noted for Pond Cove Elementary School. The number of reduced price lunches served was underreported. An adjusted School Detail can be completed, the claim form updated, and then the claim form reapproved so the meals can be reimbursed.

***Performance Standard 2***

**Meal Components and Quantities-**

**Review Period:** One week's worth of breakfast and lunch menus and production records were reviewed for the month of December 2014.

### *Pond Cove Elementary School*

Lunch: The meal pattern requires that all five meal components (whole grains, meat/meat alternate, fruit, vegetables, and milk) be offered to students every day in the required serving sizes. Meal pattern requirements were met due to the wide variety of salad bar offerings. However, the following suggestions would make it easier for all cashiers to be able to quickly identify a reimbursable meal and ensure that the meals claimed for reimbursement meet meal requirements:

- The roll offered with the daily chef salad choice is a 1.5-ounce equivalent. This item meets the daily grain minimum requirement of 1-ounce equivalent but not the weekly minimum requirement of 8-ounce equivalent. It is recommended to offer a 2-ounce equivalent with the chef salad choice.
- As listed in the recipe, the deli bar choices offered each day meet the daily minimum 1-ounce Meat/Meat Alternate (M/MA) equivalent, but do not meet the weekly minimum requirement of 8-ounce equivalent. The deli bar recipe should be revised to offer a 2-ounce M/MA equivalent. The Food Buying Guide is a great resource when determining how meat/meat alternates credit to meet the meal pattern.
- The sausage offered with the pancakes on December 4, 2014 does not contribute enough meat/meat alternate to meet the minimum daily 1-ounce requirement and therefore cannot count as a meal component. An additional M/MA needs to be offered with this lunch choice.

Production records indicate that the daily and weekly milk variety, vegetable subgroup and fruit requirements were met. Orange juice should be recorded separately on the production record as it is not part of the milk component. It contributes to the fruit component and is not a milk substitute.

Breakfast: Breakfast menus were assessed for meeting the daily and weekly requirements for fruit, milk variety and minimum 1-ounce equivalent/day and 7-ounce equivalent/week of whole grain rich offerings. The muffins were not whole grain rich and need to be discontinued or switched to a whole grain rich version. Technical assistance was provided and the Director gave a copy of a whole grain muffin recipe they will be using from now on. The amount of granola served with the yogurt parfait was insufficient and did not meet the 1-ounce daily minimum. This item should provide a ¼ cup of granola and the recipe should be revised to reflect this change.

Breakfast production records need to list juice separately from milk as they contribute to different menu components.

### *Cape Elizabeth High School*

Lunch: The meal pattern requires that all five meal components (whole grains, meat/meat alternate, fruit, vegetables, and milk) be offered to students every day in the required serving sizes. All minimum daily and weekly requirements were met due to the wide variety of salad bar offerings. However, the following suggestion would make it easier for all cashiers to be able to quickly identify a reimbursable meal, and ensure that the meals claimed for reimbursement meet meal requirements:

- As listed in the recipe, the deli bar choices offered each day do not meet the daily minimum 2-ounce M/MA equivalent or weekly minimum 10-ounce equivalent. Deli meats do not credit ounce for ounce and recipes need to be revised to reflect correct crediting. The USDA Food Buying Guide should be consulted when determining how meat/meat alternates credit to meet the meal pattern.

Production records indicate that the daily and weekly milk variety, vegetable subgroup and fruit requirements were met. Orange juice should be recorded separately instead of being included with the milk count as it is not part of the milk component. It contributes to the fruit component and is not a milk substitute. Some of the production records are incomplete as serving size and quantities are not always filled out. The purpose of production records are to support the claiming of meals and therefore must document all items that are offered as part of the reimbursable meal.

**Breakfast:** Breakfast menus were assessed for meeting the daily and weekly requirements for fruit, milk variety and minimum 1-ounce equivalent/day and 9-ounce equivalent/week of whole grain rich offerings. The muffins and corn bread were not whole grain rich. These items need to be discontinued or switched to a whole grain rich version. The amount of granola served with the yogurt parfait was insufficient and did not meet the 1-ounce daily minimum. This item should provide a ¼ cup of granola and the recipe should be revised to reflect this change. Kix cereal does not meet the minimum daily grain requirement as packaged and needs to be bundled with another whole grain item in order to meet the daily and weekly whole grain rich requirements.

Breakfast production records do not indicate that fruit was offered. It is required that 1 cup of fruit be offered daily with breakfast and a student must have at least a ½ cup with their meal to be claimed for reimbursement. Orange juice needs to be listed separately from milk as they contribute to different menu components.

**Day of Review:** On the day of the on-site review, meals were observed to ensure sufficient food components were offered to students and Offer vs. Serve was implemented correctly.

#### *Pond Cove Elementary School*

**Lunch:** In order to be a complete meal that is eligible for reimbursement, a student meal must consist of at least three of the five meal components, one of which must be at least a ½ cup fruit and/or vegetable. At PCES, if a student's meal did not meet this requirement, the student was asked if they would be going to the salad bar, which is located after the cashier's station. If the student indicated they were going to the salad bar, the cashier recorded the meal as a reimbursable meal. The reviewer observed three students who stated they would be going to the salad bar, were recorded as having a reimbursable meal and yet did not. One student was observed with a hamburger and milk, went to the salad bar and selected croutons and dinner rolls. There was not a ½ cup fruit or vegetable on their tray. Another student was observed with a hamburger and milk, stated they were going to the salad bar, and went to sit down instead. There was not a ½ cup fruit or vegetable on their tray. A third student had ½ cup of broccoli and a milk. They went to the salad bar and selected additional vegetables. This meal only had two meal components (vegetable and milk). These meals are not eligible for reimbursement, one was corrected onsite.

The two salad bars are being used to meet the vegetable subgroup requirements. However, since the salad bar is located after the point of service where the cashier identifies a reimbursable meal, the salad bar offerings do not contribute to the meal pattern. The reviewer and the School Nutrition Director discussed possibilities to relocate both salad bars before the cashier stations. It was determined that the best option would be to menu and serve fruit and vegetables that meet the meal pattern requirements and cashiers will ensure students have a minimum ½ cup fruit and/or vegetable with their meal. The salad bars will continue to be located after the cashier and will be offered as ‘extra’ items meaning they will not be used to contribute to the meal pattern.

There was signage indicating what entrée was being served for lunch, but it did not include the entire meal or the requirement of at least a ½ cup fruit and/or vegetable. Technical assistance was provided.

Breakfast: Was not observed at this school.

### *Cape Elizabeth High School*

Breakfast: The meals offered met the required food components for the Food Based Menu Planning System with the exception of the cornbread, bagels, English muffin and muffins all of which were not whole grain rich. These items need to be replaced with a whole grain rich option or discontinued. The Director provided the reviewer with a revised muffin recipe and label for English muffins which meet meal pattern requirements.

Lunch: Meals served offered all of the required meal components for the Food Based Menu Planning System. The Garlic Herb wraps offered at the deli bar are not whole grain rich. Training needs to be provided to cashiers that if a student has a garlic wrap, it does not count as a component for a reimbursable meal. Cashiers had a good understanding of what constitutes a reimbursable meal. Additional training is always helpful as being able to recognize a reimbursable in a matter of seconds takes skill and training. Both cashiers provided great customer service to students.

### *General Areas*

**Resource Management-Financial-** For the month of December 2014, the financial records were in good order, maintained correctly and provided a clear audit trail.

To determine the program’s financial status, food and labor expenses are compared to revenue. For a program to breakeven, the total percent of food, labor and other should not exceed 100%. If the percentage of expense to revenue exceeds 100%, the program is losing money and a review of income and expenses should be completed. For SY 2013-2014, revenues and expenses were obtained from the ED289A report. A comparison of expenses to revenue was determined as follows:

<b>SY 2013-2014</b>	<b>Target</b>	<b>Actual</b>
Percentage of Food to Total Revenue	35-40%	44.16%
Percentage of Labor to Total Revenue	50-55%	55.91%
Percentage of Other to Revenue	5-10%	<u>5.28%</u>
		<b>105.35%</b>

Based on the target ranges, food costs for the 2013-2014 school year were high. Increasing program revenue and/or reducing food/labor costs would benefit the program financially.

**Records and Record Keeping-** Meal production records document the amounts of food prepared along with total meal counts. High school production records are incomplete for both breakfast and lunch. At times they are missing total student and adult meal counts, projected and actual servings, total reimbursable meals and a la carte meals, as well as component and portion sizes. Production records must document all items that are offered as part of the reimbursable meal.

The State of Maine requires records to be kept for seven years. USDA requires three years, but because Maine's requirement is more restrictive, records need to be maintained for seven years. This is a change for food services that Peter Esposito was already complying with.

**Smart Snacks Competitive Foods Rule-** The competitive foods rule applies during the school day, defined as the period of the midnight before, to 30 minutes after the end of the official school day. The rule applies to all foods sold to students on the school campus.

This rule went into effect July 1, 2014. At Cape Elizabeth High School, the hot cocoa, bagels and animal crackers were not complaint. Technical assistance was provided. These items can no longer be sold to students.

**Labor Management-** Labor productivity is expressed as Meals Per Worker Hour (MPWH) rate, which is the average meal equivalent of lunch, breakfast and a la carte, divided by the total daily labor hours.

*Pond Cove Elementary School/Cape Elizabeth Middle School*

PCES and CEMS share a kitchen. Therefore, the Meals Per Worker Hour (MPWH) rate was determined using data from both schools. The MPWH was 11.7 for the month of December 2014. The minimum goal for this size program is 18-22 MPWH.

Suggested goals are given in a range. The higher number is for a convenience operation, serving primarily pre-made items, such as canned or frozen products, requiring limited staff hours. The lower number is for primarily conventional school-made from scratch operations, requiring more staff hours.

The MPWH is a good management tool to assess how well labor is being managed.

Participation rates for the month of December 2014 were:

	Free	Reduced	Paid	Overall
Breakfast	24.84%	26.67%	3.46%	<b>5.21%</b>
Lunch	77.85%	92.22%	34.04%	<b>37.59%</b>

Overall meal participation is low. Average participation in the Breakfast Program for Maine Elementary Schools is 32.8% and Maine Middle Schools is 32.6%. Average participation in the Lunch Program for Maine Elementary Schools is 56.4% and Maine Middle Schools is 65.7%

*Cape Elizabeth High School*

The Meals Per Worker Hour (MPWH) rate was **15.7** for the month of December 2014. The minimum goal for this size program is 16-19 MPWH.

Suggested goals are given in a range. The higher number is for a convenience operation, serving primarily pre-made items, such as canned or frozen products, requiring limited staff hours. The lower number is for primarily conventional school-made from scratch operations, requiring more staff hours.

Participation rates for the month of December 2014 were:

	Free	Reduced	Paid	Overall
Lunch	43.06%	100%	28.53%	<b>29.77%</b>
Breakfast	30%	83.33%	9.81%	<b>11.31%</b>

Overall meal participation is low. Average participation in the Breakfast Program for Maine High Schools is 23.3%. Average participation in the Lunch Program for Maine High Schools is 49.5%.

**Food Safety and Sanitation**

At PCES, the most recent Health Inspection Report was displayed in the kitchen manager's office. Health Inspection reports needed to be displayed for public view. This was corrected on-site. Federal Regulations require schools to have a Food Safety Program based on Hazard Analysis and Critical Control Point (HACCP) for the preparation and service of meals. Written Standard Operating Procedures (SOP) were not available for review. The kitchen and food storage areas were clean and well organized.

At CEHS, no problems were observed during the review.

**Civil Rights**- No problems were observed during the review.

**Wellness Policy**- The Cape Elizabeth School Department's Wellness Policy was reviewed. The passing of the Hunger Act added more requirements to the already required Wellness Policy, Public Law 111-296. The Wellness Policy must now also include:

- Goals for nutrition promotion and education
- Goals for physical activity
- Parents, students, food service, teachers of physical education, school health professionals, school board and school administration be permitted to be on a wellness board or committee
- Periodic review and updates of policy
- Inform public of policy implementation status
- Designate an official(s) to ensure school(s) comply with policy

**Professional Development**- There are proposed professional development standards expected to be implemented July 1, 2015. Schools should be aware of the proposed rule while budgeting for training. As proposed, all food service staff employed for 20 hours or more a week will need to document 8 hours of continuing education per year. For food service staff employed less than 20 hours a week, annual continuing education requirements will be prorated. Kitchen Managers, those individuals directly responsible for the management of the day-to-day school food service operations for a participating school(s), will need 12 hours of continuing education per year. School Nutrition Directors, those individuals directly responsible for the management of the day-to-day operations of school food service for a School Food Authority, will need 15 hours of continuing education per year.

### **Summary**

The Cape Elizabeth School Nutrition Program is doing a nice job given all the recent changes to the school breakfast and lunch meal pattern. Additional work is needed to ensure compliance with whole grain requirements and that production records are being filled out accurately. I am confident that the necessary changes will be made to ensure program compliance. It was a pleasure to review the Cape Elizabeth School Nutrition Program.

Sincerely,



Sarah D. Platt, RD  
Education Specialist