



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
ACTING COMMISSIONER

January 30, 2019

Christian Elkington
Superintendent
Brooklin Public Schools
251 N Deer Isle Road #1
Deer Isle, ME 04627

Dear Superintendent Elkington:

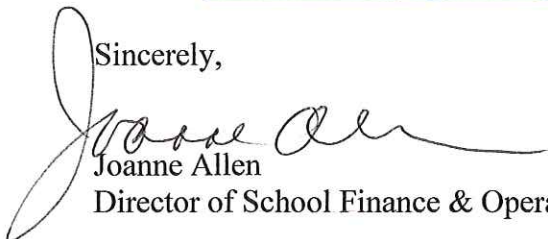
An Administrative Review of the Brooklin Public Schools Nutrition Program was conducted on January 16, 2019.

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 May 31, 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.

Sincerely,



Joanne Allen
Director of School Finance & Operations

JA/AA/pn

Enclosure

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Brooklin School

Local Education Official: Christian Elkington

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: Certification and Benefit Issuance – *Households receiving free meal benefits due to Direct Certification were not being notified of the benefit.*

Corrective Action: Submit a template letter or method that will be used in the future.

Date Due: May 31, 2019

Estimated Fiscal Action: None

Finding 2 – Performance Standard 2: Meal Counting and Claiming – *Meals were being claimed inaccurately; at times, multiple months of meal counts were included on a single claim.*

Corrective Action: Submit the February meal counts for claim validation.

Date Due: May 31, 2019

Estimated Fiscal Action: None at this time

Finding 3 – Performance Standard 2: Meal Components and Quantities - *Menu documentation from the review period did not meet meal pattern requirements. The two alternative sandwich options did not contain enough meat/meat alternate to ensure an average of 9 ounces were offered weekly. In addition, a minimum of $\frac{3}{4}$ vegetable was not offered to all students two days during the review week.*

Corrective Action: Evidence of sandwich adjustments provided during the on-site review. This has been corrected. Please submit production records for the week of February 11 – 15, 2019 as verification that vegetable requirements are met.

Date Due: May 31, 2019

Estimated Fiscal Action: None at this time

Finding 4 – General: Civil Rights – *Program materials contained an outdated full non-discrimination statement.*

Corrective Action: Send a sample template than includes the current full statement.

Date Due: May 31, 2019

Estimated Fiscal Action: None

Finding 5 - General: Local 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: May 31, 2019

Estimated Fiscal Action: None

Reviewer's Signature  Date 1/30/19

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

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

Superintendent

Date

**Administrative Review Report
Brooklin School Nutrition Program
January 16, 2019**

Introduction

The Brooklin School Nutrition Program was reviewed. Brooklin 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-

- Households that receive free meal benefits as a result of Direct Certification were not notified that they are receiving the benefit. Households must be notified. Corrective Action is required.
- Direct Certification lists must be maintained on file after being checked. This acts as documentation to show how students receiving free benefits were qualified due to direct certification. Technical Assistance was provided on the need to maintain the lists on file.

Meal Counting and Claiming- Upon review of the November claim for reimbursement, it was observed that the first few days of November were included on the October claim, rather than the November one. This was due to the system of weekly meal count entry into the POS system. Multiple months cannot be included on a single month's claim. Corrective Action is required.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities-

- Daily alternative sandwiches do not credit enough to ensure a weekly minimum of 9 ounces of Meat/Meat Alternate are offered.
- ½ cup vegetable offered to lower grades on two days of the review week. A minimum of ¾ cup must be offered daily.

Corrective Action is required.

Technical Assistance was provided on the need to ensure milk varieties are listed on both breakfast and lunch production records.

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 \$29,571.96 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	86.15%
Percentage of Labor to Total Revenue	50-55%	88.16%
Percentage of Other to Revenue	<u>5-10%</u>	<u>20.35%</u>
	100%	194.66%

Food, labor, and other costs are all higher than the recommended ranges. Per conversations with school and central office staff, last year's costs were higher than typically seen due to equipment repairs and staff turnover.

Increasing participation in breakfast and lunch will bring in additional revenue, which can help meet target ranges.

General Program Compliance

Civil Rights- The full non-discrimination statement used on program materials was not up to date. Corrective action is required.

Wellness Policy- The wellness policy was reviewed and the following elements need to be updated:

- Standards and nutrition guidelines for all foods and beverages available during the school day that are consistent with Federal regulations, including:
 - *Smart Snacks in School* nutrition standards for items sold to students.
 - Policies for foods and beverages, not sold to students, but available throughout the school day (e.g. classroom parties, foods given as reward, classroom snacks, etc.).

The current wellness policy references a separate policy (EFE) which includes Chapter 51 regulations. Chapter 51 has been replaced with the *Smart Snacks in School* requirements.

- Policy for food and beverage marketing consistent with Maine statute §6662 (3) Food and beverage advertising

In addition, the wellness policy should be available online to the public and include the date it was most recently updated.

Corrective action is required.

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

It was a pleasure reviewing the Brooklin School Nutrition Program. Both the Brooklin School and Central office staff were easy to work with, accommodating, and very organized. Ellen Carville, the Cook at Brooklin School, has done a great job learning the complicated regulations in a short amount of time. Her food was delicious, the kitchen spotless and the students happy. Similarly, Amy Billings in the central office has done an excellent job learning the federal and state regulations. Keep up the great work.

Sincerely,



Adriane Ackroyd
Child Nutrition Consultant