



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

April 3, 2019

Mark Hurvitt
Superintendent
Brooksville Public Schools
PO Box 630
Blue Hill, ME 04614

Dear Superintendent Hurvitt:

An Administrative Review of the Brooksville Public Schools Nutrition Program was conducted on March 11, 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,

A handwritten signature in blue ink, appearing to read 'Walter Beesley'.

Walter Beesley
Child Nutrition Director

WB/AA/pn

Enclosure

**Administrative Review Report
Brooksville Elementary School Nutrition Program
March 11, 2019**

Introduction

The Brooksville Elementary School Nutrition Program was reviewed. The school was selected based on Federal Regulation 7 CFR 210.18 and Maine Department of Education, Child Nutrition policies and procedures.

Performance Standard 1: Meal Access and Reimbursement

Meal Counting and Claiming - On the day of review, a student was observed leaving the point of service with a breakfast that only contained two creditable items. The third item was enriched bread which does not count towards the meal pattern. Whole grain-rich cereal was available. Staff was alerted of the issue and Technical Assistance was provided on-site. Remaining meals observed during breakfast and lunch service were reimbursable with Offer versus Serve implemented correctly.

Performance Standard 2: Meal Pattern and Nutritional Quality

Meal Components and Quantities- Corrective Action is required.

- The sliced sandwich bread used throughout the review week was not whole grain rich. The pasta and rice served at lunch throughout the review week were also not whole grain rich. As a result, the lunches served on February 4, 6, and 7 could be subject to reclaim as there were no whole grain rich grain options offered on those days. During the review week, the same sandwich bread was served on three days for breakfast. As a result, the review week ended up being insufficient in grain for breakfast and some breakfasts served could be subject to reclaim.
- Sausage was on the breakfast menu during the review week. This item is unable to be counted as a meal component as there was no documentation to support the amount of meat/meat alternate the product provides. Technical Assistance was provided on the need to offer a Child Nutrition (CN) labeled product.
- Recipes sent to reviewer contained enriched flour and did not indicate that whole wheat flour was used. Whole wheat flour was observed on site and Technical Assistance was provided on the need to update recipes to indicate what is being used.
- Production records had errors at times. Technical Assistance was provided on the need to ensure items are documented correctly.

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 \$36,682.43 is not included in our comparison of expenses to revenue below:

SY 2018	Target	Actual
Percentage of Food to Total Revenue	35-40%	71.84%
Percentage of Labor to Total Revenue	50-55%	179.36%
Percentage of Other to Revenue	<u>5-10%</u>	<u>11.22%</u>
	100%	262.42%

Susanne Dodge, the head cook, prepares a lot of scratch cooked items. While this adds cost to the program, it also increases meal quality which is a benefit to the students. Increasing participation in school breakfast and lunch can help increase revenue, which would assist in reaching the target recommended ranges.

Meal Charging- Brooksville communicates their payment policy with families in the student handbook. Technical Assistance was provided on best practices for meal charging procedures and the need to consider methods to address any future unpaid meal debt. School Union 93, which provides administrative support to the school, is currently reviewing their procedures.

General Program Compliance

Smart Snacks Competitive Foods Rule- As a reminder, food items not meeting Smart Snacks standards cannot be sold during the school day. This includes fundraisers such as bake sales that could take place during the school day.

Food Safety and Sanitation- Overall, there are very good food safety and sanitation practices at Brooksville Elementary School. It was observed that the freezer was running a bit high in temperature and the hand wash sink did not have hot enough water. Please ensure these are fixed as soon as possible. Technical Assistance was also provided on the proper temperature for reheating prepared foods.

Civil Rights – Corrective Action is required.

- Outdated *And Justice For All* posters were on display. New ones have been sent to the school for posting.
- Jackie Pike, the staff member in charge of applications, verification and the Point of Service meal counting system has not received Civil Rights training. The link to the Maine DOE training has been provided.
- The notification letters sent to families regarding meal benefits and verification contained an outdated Maine Civil Rights statement. Updated templates have been provided.

Buy American Provision – Items that can credit towards a meal component must be a product of the United States. Exceptions to this rule are products that are not produced in sufficient quantities in America. It was observed that the haddock used is a product of China and the fresh potatoes are a product of Canada. Corrective Action is required.

Meal Signage – Signs indicating what constitutes a reimbursable breakfast and lunch were not posted for students to reference. Sample signs have been provided. 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

Susanne Dodge prepares many items from scratch and includes a lovely variety of items into her menus. Students were very excited to eat lunch. It is clear that Susanne cares for the students and the quality of food she provides to them. Similarly, Jackie Pike does a good job maintaining paperwork on-site and completing her duties. All applications were approved correctly and verification was done well.

Sincerely,



Adriane Ackroyd
Child Nutrition Consultant

Official Notification of Review Findings and Required Corrective Action

Local Education Agency: Brooksville Public Schools

Local Education Official: Mark Hurvitt

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 2: Meal Pattern and Nutritional Quality – *Whole Grain requirements were not met throughout the review week.*

Corrective Action: Submit one week of breakfast and lunch production records and supporting grain documentation to illustrate that the finding has been corrected.

Date Due: May 31, 2019

Estimated Fiscal Action: \$188.81 (\$160.63 for 3 days of lunches and \$28.18 for one day of breakfasts)

Finding 2 – General: Civil Rights – *An outdated “And Justice For All” civil rights poster was observed in the cafeteria.*

Corrective Action: The updated poster has been sent to the school. Please replace the red, white and blue poster with the updated green one. Send a picture to the reviewer to show the new poster has been posted.

Date Due: May 31, 2019

Estimated Fiscal Action: None

Finding 3 – General: Civil Rights – *Jackie Pike had not received Civil Rights training.*

Corrective Action: Review the Maine Department of Education Child Nutrition Civil Rights training and send reviewer a screenshot of the completed webinar with signature and date of completion.

Date Due: May 31, 2019

Estimated Fiscal Action: None

Finding 4 – General: Civil Rights – Notification letters contained an outdated Maine Civil Rights statement.

Corrective Action: Updated templates have been provided. Submit copies of customized versions to the reviewer.

Date Due: May 31, 2019
Estimated Fiscal Action: None

Finding 5 – General: Buy American – Haddock and potatoes were observed to be products of China and Canada, respectively.

Corrective Action: For any item that can credit as a meal component, Brooksville must purchase American products or maintain documentation on why the non-American product was obtained. Submit a plan to ensure this happens.

Date Due: May 31, 2019
Estimated Fiscal Action: None

Finding 6 - General: Meal Signage – Signage indicating what constitutes a reimbursable breakfast and lunch were not posted in the cafeteria.

Corrective Action: Sample signs have been provided to the school. Please send the reviewer a picture of the signs posted.

Date Due: May 31, 2019
Estimated Fiscal Action: None

Reviewer's Signature  Date 4/3/19

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

1st Review Revisit

Date Mailed to School/Institution Official 4/4/19

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

Signature of Local Education Agency Official Superintendent _____
Title Date