



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

JANET T. MILLS
GOVERNOR

A. PENDER MAKIN
COMMISSIONER

June 12, 2019

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

Dear Superintendent Elkington:

A Procurement Review of the Brooklin School Nutrition Department was conducted.

Please find enclosed the *Review Report* and *Findings and Required Corrective Action*. Return a signed copy of the *Findings and Required Corrective Action* when submitting the requested documentation. **Corrective action documentation is due by July 12, 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.

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 black ink, appearing to read "Walter Beesley".

Walter Beesley
Child Nutrition Director

WB/AA/pp

Enclosure

**Procurement Review Report
Brooklin School Nutrition Program
Review Period SY 2018**

A procurement review of the Brooklin School Nutrition Department was conducted. The purpose of this review is to ensure compliance with Federal Regulations 2 CFR 200 and 7 CFR 210 as well as applicable local laws when procuring goods and services for the school nutrition department.

Code of Conduct- No findings.

Procurement Procedures- The School Nutrition Program does not have documented Procurement Procedures. Written procedures will need to be developed to comply with federal regulations. Because Brooklin School does not have its own small purchase threshold, or the dollar amount when a formal bid is required, then they would default to the federal small purchase threshold which is \$250,000. The written procedures must include at a minimum:

- All procurement activities will adhere to State, local and Federal laws and regulations as outlined in 2 CFR 200 and 7 CFR 210.
- The small purchase threshold.
- The acquisition of unnecessary or duplicative items is prohibited.
- The SFA takes steps to assure that small, minority and women's businesses, enterprises and labor surplus firms are used when possible.

Micro-Purchases- For School Year 2018, micro-purchase procedures were not followed. Federal law requires that micro-purchases be reasonable and equitably distributed among qualified suppliers. During December 2017, food purchases were not made from various vendors and therefore did not adhere to micro-purchase guidelines.

During the School Year 2019 Administrative Review of the Brooklin School Nutrition Program, procurement practices were discussed with the new Cook, Ellen Carville. According to Ellen, purchases are now being made with a variety of vendors which satisfies the micro-purchase guidelines.

Consideration should be made about utilizing small/informal purchase procedures. This process involves obtaining price quotes from an adequate number of qualified sources based on written product specifications.

Corrective Action- Corrective action is required. 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.

Sincerely,



Adriane Ackroyd

**School Nutrition Procurement Review
Findings and Required Corrective Action**

Local Education Agency: Brooklin School

Local Education Official: Christian Elkington

The review will remain open until this form has been signed by the Local Education Agency Official and submitted along with the requested documentation that the review finding(s) has been corrected. Failure to return completed documentation within 30 days from the corrective action deadline date may result in the withholding of reimbursement payments.

Finding 1 – Procurement Procedures

Documented procurement procedures were not available.

Corrective action: Develop written procurement procedures compliant with federal regulations and send a copy to the reviewer.

Date Due: July 12, 2019

Estimated Fiscal Action: None at this time

Finding 2 – Micro-Purchases

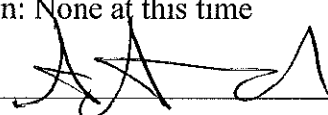
Micro-purchase guidelines were not followed.

Corrective action: Completed

Date Due: Not Applicable

Estimated Fiscal Action: None at this time

Reviewer's Signature



Date

6/14/19

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

1st Review Revisit

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

Signature of Local Education Agency Official

Title

Date