



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

JANET T. MILLS  
GOVERNOR

A. PENDER MAKIN  
COMMISSIONER

March 13, 2019

Nancy Naimey  
Principal  
St. James School  
25 Graham Street  
Biddeford, ME 04005


Dear Superintendent Naimey:

A Procurement Review of the St. James Schools 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 May 11, 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 Sarah Platt at 624-6879 or email [sarah.d.platt@maine.gov](mailto:sarah.d.platt@maine.gov).

Sincerely,

  
Walter Beesley  
Child Nutrition Director

WB/SP/pn

Enclosure

**Procurement Review Report  
St. James School Nutrition Program  
Review Period SY 2018**

A procurement review of the St. James 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-** The school nutrition program did not have a Code of Conduct as required by 2 CFR 200.318(c)(1). The program may reference a sample on our website <https://www.maine.gov/doe/schools/nutrition/financial> when developing their own.

**Procurement Procedures-** The school nutrition program does not have documented procurement procedures as required by 2 CFR 200.318 and need to develop their own.

**Micro-Purchases-** Federal law requires that micro-purchases be reasonable and equitably distributed among qualified suppliers. Receipts must be kept as documentation. Food purchases are made from various vendors and therefore adhere to micro-purchase guidelines.

**Small Purchases-** When making small or “informal” purchases, Federal law requires that at least two price quotes from suppliers be obtained and documented and the purchase made from the lowest price from a responsible bidder. The program does not make small “informal” purchases.

**Formal Purchases-** The program does not have any formal contracts.

**Corrective Action-** Corrective action is required. The enclosed form outlines what must be submitted. A detailed response and documentation of the corrective action must be returned to our office by the date specified.

We appreciate the assistance provided by your staff throughout the review process.

Sincerely,



Sarah D. Platt, RD, SNS  
Child Nutrition Consultant

**School Nutrition Procurement Review  
Review Period SY 2018  
Findings and Required Corrective Action**

**Local Education Agency:** St James School

**Local Education Official:** Nancy Naimey

**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.**

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**Finding 1 – Procurement Procedures**

The school nutrition program does not have documented procurement procedures as required by 2 CFR 200.318.

**Corrective action:** Develop procurement procedures compliant with federal requirements.

Date Due: May 11, 2019

Estimated Fiscal Action: None at this time

**Finding 2 – Code of Conduct**

The school nutrition program does not have written codes of conduct as required by 2 CFR 200.318(c)(1).

**Corrective action:** Describe in detail how this has been corrected.

Date Due: May 11, 2019

Estimated Fiscal Action: None at this time

Reviewer's Signature         *Joshua Platt*         Date         3-13-2019        

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

1<sup>st</sup> Review       Revisit

Date Mailed to School/Institution Official \_\_\_\_\_

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

\_\_\_\_\_  
Signature of Local Education Agency Official      Title      Date