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DEPARTMENT OF EDUCATION  
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**RSU 4 Nutrition Program  
SY 2021 Procurement Review Report**

A procurement review of the RSU 4 Nutrition Department, based on SY 2020 procurement, was conducted to ensure compliance with Federal Regulations 2 CFR 200, 7 CFR 210, as well as applicable local laws.

**Code of Conduct**- No findings

**Procurement Procedures**: The district Procurement Procedures reference Policy DJR- Federal Procurement Manual. The manual listed exceptions to the procedures, including Federal Child Nutrition Programs. This is incorrect as all federal child nutrition programs follow federal procurement regulations, which are described in the manual.

***Required Corrective Action***: *Remove incorrect language and send updated Federal Procurement Manual to the reviewer.*

*Date Due: January 22, 2021*

**Micro-Purchases**- No findings.

**Small Purchases**- Small purchase procedures were not followed with the purchase of a microwave steamer in SY 2020 from C Caprara. A price comparison was made with KaTom, an online restaurant supply company, which quoted a lower price; however, the purchase was made with C Caprara. Per staff interview, the school district has purchased from this company for many years and better meets their needs. Although past experience is important, according to federal procurement rules there has to be an objective reason for purchasing from a company that does not provide the lowest price. A scenario when the lowest price is not used is when the company does not meet all specifications of the request. It's important that the specs be written and all correspondence with companies be documented to show the process was completed correctly.

***Required Corrective Action***: *Submit a detailed plan for how small purchase procedures will be followed and documented in the future, when purchasing equipment.*

*Date Due: January 22, 2021*

**Small Purchases**- Oak Hill High School purchases from Coca Cola for their vending machine items; however, there is no documentation that it was procured properly. Because the school nutrition department is purchasing these items using federal funds, they must follow federal procurement regulations. Therefore; the nutrition department must either use the micro purchase method (purchases are spread equitably among vendors) or small purchase method (a price comparison is completed between vendors and the vendor with the lowest price gets the purchase). A formal process, such as an IFB can also be used; however, the solicitation documents and contract must meet federal requirements.

***Required Corrective Action:*** *Submit a detailed plan for which purchasing method will be used in the future, to ensure procurement regulations are being followed.*

*Date Due: January 22, 2021*

**Formal Purchases**- RSU 4 is a member of the Capital Area Co-Op buying group. Documentation for the solicitation and award of a prime vendor contract was reviewed and is compliant with federal procurement regulations.

Corrective Action is required. 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. Local Education Agencies have the right to appeal findings which impact their reimbursement. For more information visit <https://www.maine.gov/doe/sites/maine.gov/doe/files/inline-files/Child%20Nutrition%20Appeals%20Process.pdf>

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 Stephanie Stambach at 215-9437 or email [stephanie.stambach@maine.gov](mailto:stephanie.stambach@maine.gov).

Sincerely,

DocuSigned by:

  
Walter Beesley

Child Nutrition Director

WB/SS/pp

CC: Glen Reynolds  
Scott Eldridge