

The Commonwealth of Massachusetts

Office of the Inspector General

April 15, 2011

JOHN W. MCCORMACK STATEOFFICE BUILDING ONE ASHBURTON PLACE ROOM 1311 BOSTON, MA 02108 TEL: (617) 727-9140 FAX: (617) 723-2334

Mr. Bernie Novak Food Service Director Greenfield Public Schools 141 Davis Street Greenfield, MA 01301

Dear Mr. Novak:

As you know, the Massachusetts Office of the Inspector General (OIG) reviewed Greenfield Public Schools' (District) June 2009 receipt of a \$32,447 Richard B. Russell National School Lunch Program Equipment Assistance Grant from the Department of Elementary and Secondary Education (DESE) under the American Recovery and Reinvestment Act (ARRA).

The OIG is reviewing ARRA-related grants to identify potential vulnerabilities to fraud, waste, and abuse and other risks that could negatively impact the accountability, transparency, and anti-fraud mandates contained in the statutory language and interpretive guidance of ARRA. This review should not be construed as an investigation of the program or a comprehensive programmatic review. The OIG intends these reviews to assist recipients of ARRA funding to identify and address risks.

According to DESE's grant application, DESE awarded funds to the District for the purchase of a "steam jacketed kettle" for Greenfield High School. In December 2010, OIG staff visited Greenfield High School to verify that the District conducted the purchase pursuant to federal and state requirements and to verify installation of the equipment.

During the site visit, you informed OIG staff that while DESE's approval letter only designated the \$32,447 for the purchase of the kettle, you also purchased a convection steamer and two gas ranges. You stated that you had requested this in the grant application you submitted to DESE. You stated that you had contacted DESE and received oral approval to use the funds pursuant to the application, rather than the DESE approval letter.

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The OIG confirmed with DESE that its approval letter should have included the additional items the District requested in its grant application as part of the \$32,447 grant. Therefore, the District appropriately included these items in its grant expenditure.

The OIG review also verified that:

- The District complied with the requirements of M.G.L. c. 30B (Chapter 30B), the Uniform Procurement Act by using a sealed bid process for all of the equipment proposed and obtained the bids from legitimate business entities;
- The District chose to purchase the items from the responsible vendor with the best price;
- The amount paid by the District for the items matched the amount of the DESE grant award.
- During the site visit, the equipment appeared in operating condition and met the general specifications outlined to DESE in the grant application.

The OIG did notice that the district did not tag the equipment as having been purchased with ARRA funds. According to DESE staff, this is a federal requirement that DESE made known to all recipients via telephone in August 2009. We recommend that if you have not done so, you tag the equipment pursuant to this requirement.

Additional information for future procurements can be found on the OIG website, including step-by-step procurement information available in the current OIG manual, *Municipal, County, District, and Local Authority Procurement of Supplies, Services, and Real Property* at http://www.mass.gov/ig/igpubl.htm. A revised version called "The Chapter 30B Manual" is soon to be released on the OIG website. Also, a free introductory online "Bidding Basics" training course can be found on the OIG website at http://www.mass.gov/ig/mcppo/bb online.htm. This serves as a helpful refresher or introductory course on M.G.L. c. 30B, the Uniform Procurement Act.

I appreciate your cooperation in this review of ARRA funding. Please do not hesitate to contact my office with any questions or concerns you may have regarding this review.

Sincerely,

Gregory W. Sullivan Inspector General

Gregory W. Sullivan

cc: Mary Anne Gilbert, Department of Elementary and Secondary Education Kathleen C. Millett, Department of Elementary and Secondary Education Susan Hollins, Greenfield Public Schools