

Equipment Purchase Prior Approval Process for School Food Authorities

On June 2, 2016, the U.S. Department of Agriculture (USDA) issued [Policy Memo SP 39-2016: State Agency Prior Approval Process for School Food Authority \(SFA\) Equipment Purchases](#). This policy memo allows state agencies to develop an approved list and criteria for capital expenditure purchases that are routinely purchased by school food authorities (SFAs).

USDA's Northeast Regional Office (NERO) approved the Connecticut State Department of Education's (CSDE) capital expenditure list on August 24, 2016. The CSDE does not require SFAs to submit a request to the CSDE for prior approval if they are purchasing equipment on the USDA's approved list as of July 1, 2016 (see the CSDE's handout, [Capital Expenditure Approved List for School Food Authority Equipment Purchases](#)). However, SFAs must continue to follow all applicable federal, state, and local procurement procedures. In addition, if an SFA chooses to select equipment that is not included on the USDA-approved list, the SFA **must** submit a request to the CSDE for approval prior to purchasing the item, as required by 2 CFR 200.439. ***Any used equipment with a purchase price over \$5,000 requires CSDE approval.***

As indicated on page 2 of Policy Memo SP 39-2016, administrative review (7 CFR 210.18) and audits (7 CFR 200.501), requires the CSDE to ensure that an SFA's equipment purchases were made with approval from the USDA-approved capital expenditure list or the CSDE prior approval process. If any equipment purchases are identified as unallowable, the CSDE will disallow these purchases, and implement the CSDE debt collecting procedures.

Submitting a Capital Expenditure Request for Other Equipment

For any capital expenditure requests not included on the USDA-approved list with a unit cost of **\$5,000** or greater, SFAs must send an e-mail to their assigned [county technical support consultant](#) with the following information:

- The subject line should read "Child Nutrition Program Capital Expenditure Request." **Indicate if it is an emergency request, e.g., "cafeteria cannot function without immediately replacing the equipment."**
- The body of the e-mail message should:
 - describe the equipment, including what it is and how it will support the operation or maintenance of the nonprofit school food service;
 - provide the estimated cost and whether the SFA has sought bids for the equipment;
 - explain how the old equipment that still has value will be disposed of, and that the SFA acknowledges that any proceeds from the disposition of the equipment will be used to offset the cost of the replacement equipment;

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- acknowledge that any equipment purchased with cafeteria funds must be used exclusively (100 percent) by the nonprofit school food service, i.e., cannot be shared with other local educational agency programs; and
 - include the SFA's Child Nutrition Program sponsor number, agency name, and contact information.
- A signed, completed *Equipment Purchase Preapproval Request Form* must be attached to the email.

Resources

7 CFR 200: Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards:

<https://www.gpo.gov/fdsys/pkg/FR-2013-12-26/pdf/2013-30465.pdf>

7 CFR 210: National School Lunch Program:

<https://www.ecfr.gov/cgi-bin/text-idx?SID=4c211a738d6109939c6054a6286ac109&mc=true&node=pt7.4.210&rgn=div5s>

Capital Expenditure Approved List for School Food Authority Equipment Purchases (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/Equipment/EquipmentList.pdf>

Equipment Purchase Approval Request Form (CSDE):

<https://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/Equipment/EquipmentForm.doc>

USDA Memo SP 39-2016: State Agency Prior Approval Process for School Food Authority (SFA) Equipment Purchases:

https://fns-prod.azureedge.net/sites/default/files/cn/SP39_CACFP11_SFSP13_2016os.pdf

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For information on the school nutrition programs, visit the CSDE's [School Nutrition Programs](#) webpage or contact the [school nutrition programs staff](#) in the CSDE Bureau of Health/Nutrition, Family Services and Adult Education, 450 Columbus Boulevard, Suite 504, Hartford, CT 06103-1841.

This handout is available at <http://portal.ct.gov/-/media/SDE/Nutrition/NSLP/Forms/Equipment/EquipmentApproval.pdf>.

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To file a program complaint of discrimination, complete the [USDA Program Discrimination Complaint Form](#), (AD-3027) found online at: [How to File a Complaint](#), and at any USDA office, or write a letter addressed to USDA and provide in the letter all of the information requested in the form. To request a copy of the complaint form, call (866) 632-9992. Submit your completed form or letter to USDA by:

- (1) mail: U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410;
- (2) fax: (202) 690-7442; or
- (3) email: program.intake@usda.gov.

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