


# Procurement Review: What Schools Need to Know

September 29, 2025



Connecticut State Department of Education  
Bureau of Child Nutrition Programs

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Introductions

**Andy Paul**

- Food service management company contracts
- Procurement reviews

**Monica Pacheco**

- Food distribution/ USDA Foods
- Procurement reviews
- Farm to school

**Sean Fogarty**


- Child Nutrition Program contracts
- Equipment Assistance Grant
- Local Food for Schools (LFS) Cooperative Agreement Program

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Agenda

- Procurement Review (PR) Overview
- Next Steps
- Problem Areas
- Uploading Documents/Procurement Table (CNP System)
- Resources



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Final Rule: Child Nutrition Program Integrity

**7 CFR 210.21(h) Procurement Training**

- Annually attend training on federal procurement standards



[https://www.ecfr.gov/current/title-7/part-210#210.21\(h\)](https://www.ecfr.gov/current/title-7/part-210#210.21(h))

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CSDE 2025 Procurement Training

- Procurement 101 Part I:  
Wednesday November 12  
12:30 - 3:30 pm
- Procurement 101 Part II:  
Thursday November 13  
12:30 - 3:30 pm



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Procurement Training Applies To

- Food service directors
- Management
- Staff tasked with NSLP Procurement responsibilities
- Retain records




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Today Considered Initial Entrance Conference

Beginning of PR



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Overview of PR

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Purpose of PR

Ensure compliance

- Federal
- State
- Local

Program integrity

- Ensuring purchases are necessary, reasonable, allocable

Promote fair/open competition (good stewards of federal funds)



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Overview of PR Process

Step 1  
SFA: Update  
CNP System

- Sponsor contact
- Procurement table
- Add review attachments

Step 2  
CSDE: Initial  
Review

- Selects invoices
- Sends Procurement Review Organizational Tool (PROT)

Step 3  
SFA: Uploads  
Documents

- Invoices
- Other PROT Documents

Step 4  
Onsite  
Review

Step 5  
Corrective  
Action

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Step 1: CSDE

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Step 1: CSDE

CSDE notifies district they are selected for PR




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### Step 2: CSDE and SFA


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### Step 2: CSDE and SFA

- CSDE provides PR training

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### Step 3a: CSDE


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### CSDE Sends Follow-up Email

- Requests completion or upload of initial documents to Connecticut Online Application and Claiming System for Child Nutrition Programs (CNP System)
  - Compliance Module (Procurement Review)

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### Required Information for CNP System

- Sponsor contact information
- Sponsor Procurement Table
- Documents
  - Written Code of Conduct
  - Documented procurement procedures
  - Vendor Paid List (VPL)
  - Copy of board of education (BOE) procurement policies (3000 section)

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### CSDE Resource

#### Sample Procurement Code of Conduct for School Nutrition Programs

- Required when use federal dollars
- Must customize for district/food service
- If in BOE policy must contain all required content

[https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/procurement\\_conduct\\_code.docx](https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/procurement_conduct_code.docx)

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CSDE Resource

Sample Procurement Procedures for School Food Authorities Version 1



[https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement\\_plan\\_1.docx](https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement_plan_1.docx)  
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Sample Procurement Procedures for School Food Authorities Version 2




[https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement\\_plan\\_2.docx](https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement_plan_2.docx)  
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Vendor Paid List (VPL)

- List of all purchases made from nonprofit school food service account (NSFSA) by vendor
- Must include excess fund balance purchases
- Cannot include payments to students/parents for account balances
- January 1, 2025 – September 30, 2025
- Submit to CSDE in Excel



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Where to Find Procurement Policies

- School district's website
  - Board of Education
  - Policies
  - 3000 Business and Non-Instructional Operations



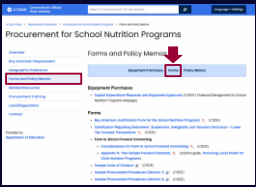
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CSDE Webpage


Forms and Policy Memos section

- Buy American Justification Form
- Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion – Lower Tier Covered Transactions
- Sample Code of Conduct
- Sample Procurement Procedures (Version 1)
- Sample Procurement Procedures (Version 2)



<https://portal.ct.gov/sde/nutrition/procurement-for-school-nutrition-programs/forms-and-policy-memos#Forms>  
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Step 3b – SFA:  
Due October 31, 2025

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SFA Completes or Uploads to CNP System

- Complete
  - Sponsor contact information
  - Sponsor Procurement Table
- Upload documents to "Review Attachments"
  - Written Code of Conduct (PDF/DOC)
  - Documented Procurement Procedures (PDF/DOC)
  - VPL (Excel only)
  - Copy of BOE procurement policies (3000 section)

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Step 4 – CSDE

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Step 4 – CSDE

- CSDE reviews VPL and selects procurements for review
  - Micro
  - Small
  - Formal
- CSDE completes individualized Procurement Review Organizational Tool (PROT)
  - Emails to district



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Step 5 – SFA

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CSDE Follows USDA's Rubric to Select Specific Procurements from Each Type

- Micro-purchase
- Small purchase
- Formal purchase
- FSMC and processor, if applicable

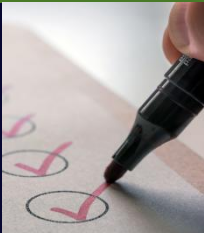


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PROT Requests Upload of Backup Documentation for Selected Procurements

- RFP/solicitations
- Contract/pricing
- 3 selected invoices
- Price quotes
- Specifications
- Micro-purchase documentation – spreading funds around community



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Procurement Review Organization Tool (PROT)

- CSDE individualizes for each SFA based on documents needed
- Tool to help SFA stay organized
- No two alike
- A section applies to an individual SFA if title is highlighted in yellow

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PROT Identifies

- Required PR documentation to submit to CSDE
  - Upload
  - Print

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Identify District's Purchase Thresholds on PROT

- Micro purchase
- Small purchase
- Formal purchase

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PROT Micro Purchases Section

- Supporting purchase documents (receipts)

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PROT Small Purchases Section

- Solicitation documentation (email, telephone script, etc)
- Solicitation responses (responses, quotes – written, verbal, emailed)
- Evaluation documentation
- Award/notification
- Supporting purchase documentation (invoices, receipts, etc)

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PROT Formal Procurements Section

- Solicitation documentation: RFP or IFB
- Cost price analysis prior to bid
- Public advertisement
- Evaluation
- Award/regret to inform notification
- Copy of contract
- Supporting purchase documentation (invoices, receipts, etc.)

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### PROT Food Service Management Company (FSMC) Section

- **Procurement of FSMC**
  - RFP with all supporting documentation
  - Contract and original addendum
  - All annual renewals
  - Any additional amendments/addenda to FSMC contract
  - Award and “regret to inform” letters

[illegible]

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### PROT FSMC Section, continued

- Monthly meeting agendas/notes (SFA/FSMC)

[illegible]

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### PROT FSMC Section, continued

- **Food Advisory Council/Board**
  - Agendas
  - Sign-in sheets with participant designation (parent, student, staff, FSMC)
  - Meeting minutes

[illegible]

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## PROT FSMC Section, continued

- **FSMC Monitoring Forms** completed by SFA (two times per year per school)
  - Submit completed forms for 2024-25 or 2025-26

[illegible]

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### PROT FSMC Section, continued

- **USDA Foods Reconciliation forms**
  - Initial contract year
  - Any renewal period

[illegible]

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## PROT FSMC Section, continued

- FSMC name
- Supporting purchase documentation (invoices and profit/loss)


[illegible]

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PROT Processing Contracts for USDA Foods Section

- Solicitation documentation: RFP or IFB
- Cost price analysis prior to bid
- Public advertisement
- Evaluation
- Award/notification
- Copy of contract and renewals
- Draw down by manufacturer report
- Supporting purchase documentation (invoices, receipts, etc)

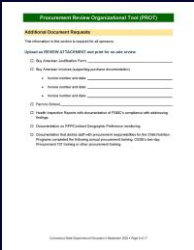


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PROT Additional Document Requests Section

- Buy American Justification Form
- Farm to School
- Health Inspection Reports
- Documentation on RFP/Contract Geographic Preference monitoring.
- Documentation district staff completed required annual procurement training




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Buy American


- Review justification forms
- Review FAR list notations
- Review sample of invoices
  - Includes procurements made by FSMC for agricultural products like produce, further processed dairy, and meats
  - Must upload invoices for CSDE review



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Step 6 – SFA




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Upload Documents to CNP System: “Review Attachments”

- Micro, small and formal
  - Invoices
  - Procurement documents
- Processing documents
- Buy American exception forms/invoices
- Farm to School activities
- Geographic preference monitoring
- Procurement training documentation




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Organize Hardcopy Documents under PROT


- Place all required documents under each corresponding cover page



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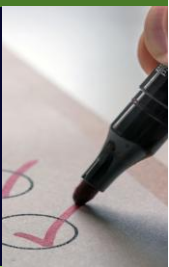
### Step 7 – CSDE

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### CSDE Desk and On-site Review: “Review Attachments”

- Micro, small and formal
  - Invoices
  - Procurement documents
- Processing documents
- Buy American Exception forms/invoices
- Farm to School activities
- Geographic preference monitoring
- Procurement training documentation



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### SFAs Contracting with Food Service Management Company (FSMC)

- Review of SFA Procurements only
- Responsibility of SFA not FSMC
- Cannot be delegated to FSMC


- Additional questions
  - Advisory board
  - Monitoring
  - Invoices
  - Discounts, rebates, and credits
  - USDA Foods
    - ▶ Use/inventory
    - ▶ Credits

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### CSDE Desk and On-site Review

- Meet with Business Official or responsible staff available for dialogue



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### Step 8 – CSDE/SFA

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### Exit Conference with Overview Report

- Review Results
  - Corrective action
    - ▶ Due dates
  - Technical assistance
  - Fiscal action (if necessary)
- Business official and other responsible staff
- On-site or virtual



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### Step 9 –SFA

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### Corrective Action

- Complete in CNP System
- Upload documents to each corrective action item
- Provide any necessary sponsor response in designated section



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### Step 10 – CSDE

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### Corrective Action

- Review/approve
- Send closing letter
  - Superintendent
  - Business official
  - Other appropriate staff



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### Common Problem Areas from Previous PRs

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### Common Problem Area 1

- No Code of Conduct
- Does not address all requirements
- Nominal value not set





[https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/procurement\\_conduct\\_code.docx](https://portal.ct.gov/-/media/sde/nutrition/nslp/procure/procurement_conduct_code.docx)

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Common Problem Area 2

- No documented procurement plan for NSFSFA
  - Version 1
  - Version 2



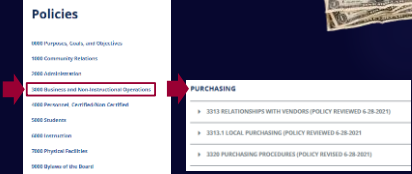

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[https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement\\_plan\\_2.docx](https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement_plan_2.docx)

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Common Problem Area 3

- Not knowing purchasing thresholds




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Common Problem Area 4

- No Buy American language in procurements




“The District/State agency/Territory participates in the National School Lunch Program and School Breakfast Program and is required to use the nonprofit food service funds, to the maximum extent practicable, to buy domestic commodities or products for Program meals. A ‘domestic commodity or product’ is defined as one that is either produced in the U.S. or is processed in the U.S. substantially using agricultural commodities that are produced in the U.S. as provided in 7 CFR 210.21(d).”

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Common Problem Area 5, continued

- Enforcement of Buy American Provision
  - Must document exceptions on Buy American Justification Form



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Common Buy American Issues

- Products in kitchen
- Fruit
- Fruit Juices




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Common Problem Area 6

- Lack of documentation for procurements
  - From micro-purchase to formal




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Common Problem Area 7

- Lack of contract management
- Holding vendor to terms and conditions of contract
- Documenting problems

Hardest part of many procurements



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Uploading Documents to CNP System and Procurement Table

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Uploading Documents Steps 1 and 2

- Access CNP System
- Log in with User ID and Password




<https://ct.cnpus.com/prod/Splash.aspx>

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Uploading Documents Step 3

- Select **Compliance** section




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Uploading Documents Step 4

- Select **Procurement Review Tracking**

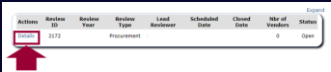


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Uploading Documents Step 5

- Select **Details** under Actions

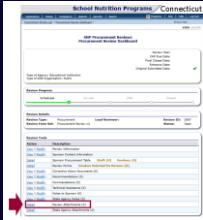


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Uploading Documents Step 6

Select Review Attachments




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Uploading Documents Step 7

Select Add Attachment

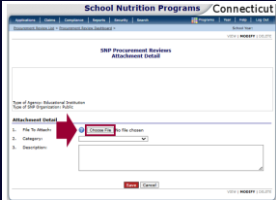


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Uploading Documents Step 8

Select Choose File

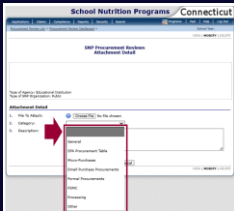


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Uploading Documents Step 9

Choose Category from drop-down menu

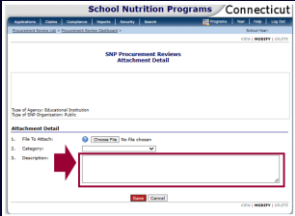


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Uploading Documents Step 10

Enter Description

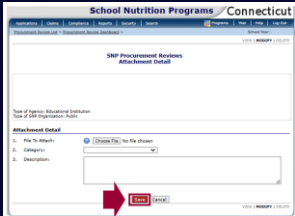


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Uploading Documents Step 11

Select Save



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<https://portal.ct.gov/sde/nutrition/procurement-for-school-nutrition-programs>

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Questions?



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Office of the Assistant Secretary for Civil Rights  
1400 Independence Avenue, SW  
Washington, D.C. 20250-9410; or
2. fax: (833) 256-1665 or (202) 690-7442; or
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