

Getting Ready for Success:
Preparing for the Child
Nutrition Program
Procurement Review

September 2026 • Day 3

Connecticut State Department of Education
Bureau of Child Nutrition Program

CSDE Procurement Staff

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

- Required Documents
- Problem Areas
- School food authority (SFA) Procurement Table (CNP System)
- Procurement Review Process
- Resources

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Final Rule: Child Nutrition Program Integrity

- Regulation 7 CFR §210.21(h) Procurement Training
 - Annually Attend Training – Federal Procurement Standards
 - Procurement 101 Part I: Thursday October 15, 2:00 – 4:00pm
 - Procurement 101 Part II: Thursday October 22, 2:00 – 4:00pm
 - Procurement 101 Part III: Thursday November 5, 2:00 – 4:00pm
 - Procurement 101 Part IV: Thursday November 12, 2:00 – 4:00pm
 - Food Service Directors – Business Officials--Management – Staff Tasked with NSLP Procurement Responsibilities
 - Retain Records

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Why is SFA having a Procurement Review?

- USDA increased its focus
- In NSLP regulations as of 2016
- To ensure
 - SFAs in compliance
 - SFAs are good stewards of federal funds
 - Students benefit
 - Program integrity
 - Free and open competition

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Procurement Definition

- The purchase of goods and services
 - Planning
 - Drafting specifications
 - Advertising procurement
 - Awarding contract
 - Managing contract

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Procurement 101

≤ Small Purchase Threshold >

Informal

Small Purchase
(Requires price quotes from at least 3 bidders)

Micro Purchase

Noncompetitive Purchase
(value of purchase cannot exceed \$15,000)

Federal threshold = \$350,000
CT threshold = none
Municipality = varies

Formal

Sealed Bids (IFBs) and Competitive Proposals (RFPs)
(Requires public advertising)

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Required Documents

- Written Code of Conduct
- Documented Procurement Plan
- Vendor Paid List (VPL)



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Written Code of Conduct

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Purpose of Written Code of Conduct

- Governs performance of employees engaged in procurement for entities receiving federal funds
- Prohibits employees from soliciting gifts, travel packages and other incentives from prospective contractors
- SFAs must set standards for when financial interest is not substantial, or the gift is an unsolicited item of nominal value and may be accepted
- Must provide for disciplinary action to be applied in the event standards are violated

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CSDE Sample Procurement Code of Conduct for School Nutrition Programs

- Must be on file



https://portal.ct.gov/-/media/sde/nutrition/nsfp/procure/procurement_conduct_code_snp.docx

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Documented Procurement Procedures

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Purpose of Documented Procurement Procedures

▪ Reflect federal, state, and local laws and regulations

▪ Clearly outline school food service procurement processes

▪ Maintain all records to detail procurement history including specifications, responses

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Why Are Documented Procurement Procedures Needed?

▪ Transparency

▪ Organization

▪ Assisting others who help

▪ Being a good customer



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Sample Procurement Procedures for School Food Authorities Version 1





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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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School Food Service Procurement Procedures

▪ Must be documented and updated as needed

▪ Required in addition to district's policies for procurement

▪ Needs to list district's purchasing thresholds-micro, small and formal and what steps you take for each



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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

▪ July 1, 2025 – June 30, 2026

▪ Submit to CSDE in Excel

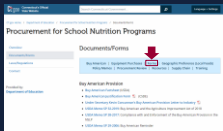


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Where to Find Templates and Forms

Forms section of CSDE's Procurement for School Nutrition Programs webpage

- 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>

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Common Problem Areas from Previous Procurement Reviews

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1 – No Code of Conduct

- Must be on file



https://portal.ct.gov/-/media/sde/nutrition/nsip/procure/procurement_plan_snp_1.docx

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2 – No Documented Procurement Plan for NSFSA

- Version 1





https://portal.ct.gov/-/media/sde/nutrition/nsip/procure/procurement_plan_snp_1.docx

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3 – Not Knowing Purchasing Thresholds

Policies

- 8888 Purchases, Goods, and Services
- 8888 Community Relations
- 8888 Information
- 8888 Business and Procurement
- 8888 Personnel
- 8888 Students
- 8888 Instruction
- 7888 Physical Facilities
- 8888 Rules of the Board



PURCHASING

- 3313 RELATIONSHIPS WITH VENDORS (POLICY REVIEWED 4-28-2021)
- 3313.1 LOCAL PURCHASING (POLICY REVIEWED 4-28-2021)
- 3320 PURCHASING PROCEDURES (POLICY REVIEWED 4-28-2021)

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4 – “Piggybacking” on Municipal Contracts

- SFA “Piggybacking” on municipal contracts without 2 CFR 200 Appendix II clauses



<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200/appendix-Appendix%20II%20to%20Part%20200>

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5 – No Buy American Language in Procurements

- Buy American language is required



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6 – Enforcement of Buy American Provision

- Must be listed on Federal Acquisition Regulations (FAR) non-available articles list **OR**
- Must document exceptions on CSDE's Buy American Justification Form



<https://portal.ct.gov/sde/nutrition/procurement-for-school-nutrition-programs/buy-american-requirement#justification>

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Required Buy American Documentation

- Must document exceptions from FAR list or use Buy American Justification Form
- Product in kitchen
- Fruit Juices
- 10% cap tracking



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7 – Lack of Documentation for Procurements

- From micro-purchase to formal



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8 – Lack of Contract Management

- Must hold vendor to terms and conditions of contract
- Must document problems

Hardest part of many procurements



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Entrance Conference Information



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Entrance Conference

- Today is considered your Entrance Conference



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Procurement Review Requirements:
Due October 30, 2026



- Complete and upload requested documents



- Complete Sponsor Procurement Table in CNP System



Documents to Upload

- Code of Conduct
- Procurement Procedures
- VPL

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Next Steps

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Quick Overview of Next Steps

- Step 1 – SFA: Update CNP System
 - Sponsor Contact
 - Procurement Table
 - Add Review Attachments
- Step 2 – CSDE: Initial Review
 - Selects Invoices
 - Sends PROT

- Step 3 – SFA: Uploads Documents
 - Invoices
 - Other PROT Documents
- Step 4 – Onsite Review
- Step 5 – Corrective Action

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Backup Documentation

- CSDE 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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USDA Rubric to Select Specific Procurements

- CSDE follows USDA rubric to select specific procurements from each type
 - Micro-purchase
 - Small purchase
 - Formal purchase
 - FSMC and Processor, if applicable



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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 are alike
 - Yellow highlighted sections – applicable to SFA
 - Red highlighted sections – not applicable to SFA
- Provided after CSDE receives VPL and selects invoices



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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
 - SFA FSMC Monitoring
 - Invoices
 - Discounts, rebates and credits
 - USDA Foods
 - Use/inventory
 - Credits

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Using the CNP System



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CNP System Data Entry

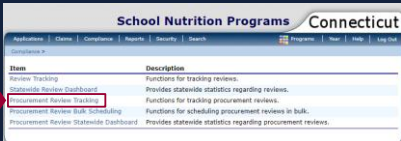


Review ID	Review Year	Review Type	Lead Reviewer	Scheduled Date	Closed Date	Nbr of Vendors	Status
2061	2026 - 2027	Procurement	Paul, Andrew	1/26/2027		0	Open

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

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CNP System Corrective Action Entry



Item	Description
Review Tracking	Functions for tracking reviews.
Statewide Review Dashboard	Provides statewide statistics regarding reviews.
Procurement Review Statewide Dashboard	Functions for tracking procurement reviews.
Procurement Review Bulk Scheduling	Functions for scheduling procurement reviews in bulk.
Procurement Review Statewide Dashboard	Provides statewide statistics regarding procurement reviews.

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

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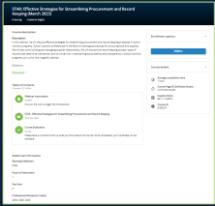
Resources



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Institute of Child Nutrition (ICN) Procurement Training

- STAR: Effective Strategies for Streamlining Procurement and Record Keeping (March 2023)



<https://theicn.doebosaa.com/learn/course/internal/view/elearning/304/star-effective-strategies-for-streamlining-procurement-and-record-keeping-march-2023>

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ICN Farm to School Training

- CICN: Farm to School Success Stories: Buying From Local Growers, Producers, and Processors (July 2022)

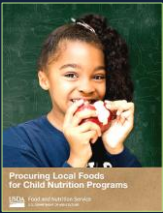


<https://theicn.doebosaa.com/learn/course/internal/view/elearning/247/cicn-farm-to-school-success-stories-buying-from-local-growers-producers-and-processors-july-2022>

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USDA Procurement Guide for Local Foods

- Procuring Local Foods for Child Nutrition Programs



<https://www.fns.usda.gov/fzs/procuring-local-foods>

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USDA Menu Planner for School Meals

- Chapter 1: Child Nutrition and School Meals
- Chapter 2: Food-Based Menu Planning
- Chapter 3: Menu Development
- Chapter 4: Meal Preparation Documentation
- Chapter 5: Procurement and Inventory Management
- Chapter 6: Meal Modifications to Accommodate Students With Disabilities
- Chapter 7: Marketing School Meals for Success

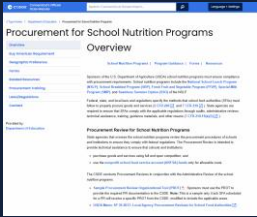


<https://www.fns.usda.gov/tn/menu-planner-school-meals>

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More Information About Procurement

- CSDE Webpage: Procurement for School Nutrition Programs
 - Buy American Requirements
 - Geographic Preference
 - Forms
 - Procurement training
 - Laws/Regulations



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

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Questions

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1. mail: U.S. Department of Agriculture
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
3. email: program.intake@usda.gov

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