School Food Authority (SFA) Procurement Procedures Template

2 CFR 200.318 requires SFAs to maintain and use documented procedures for procurement transactions under a federal award or subaward. An SFA who fills out and completes this document will satisfy the requirements for 2 CFR 200.318.

A document with incomplete steps and information will not satisfy the 2 CFR 200.318 requirement, and the document will need to be revised.

Any questions about federal procurement requirements pertaining to the National School Lunch Program should be forwarded to mde.FSMC@state.mn.us.

Oversight of contractors: Recipients and subrecipients must maintain oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. See also 200.501(h).

Procurement Procedures for U.S. Department of Agriculture (USDA) Child Nutrition Programs

Bluffview Montessori School 4001-07

The procurement procedures contained on the following pages will be implemented beginning 10/23/25 until amended. All procurements must maximize full and open competition. Source documentation must be available to determine open competition, the reasonableness, the allowability and the allocation of costs.

Bluffview Montessori intentionally seeks to prohibit conflicts of interest in all procurement of goods and services.

Chairman, School Board	Date
Superintendent/Executive Director of School	Date

Conflicts of Interest

No employee, officer, agent, or board member with a real or apparent conflict of interest may participate in the selection, award, or administration of a contract supported by the federal award. A conflict of interest includes when the employee, officer, agent, or board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from an entity considered for a contract.

An employee, officer, agent, and board member of the recipient or subrecipient may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors.

However, Bluffview Montessori has set standards for situations where the financial interest is not substantial, or a gift is an unsolicited item of five dollars or less as stated in Policy 421.

Violations of the standards set in this document may result in disciplinary actions including up to and including termination.

If the recipient or subrecipient has a parent, affiliate, or subsidiary organization that is not a State, local government, or Indian Tribe, the recipient or subrecipient must also maintain written standards of conduct covering organizational conflicts of interest. Organizational conflicts of interest mean that because of relationships with a parent company, affiliate, or subsidiary organization, the recipient or subrecipient is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

In accordance with federal civil rights law and U.S. Department of Agriculture (USDA) civil rights regulations and policies, this institution is prohibited from discriminating on the basis of race, color, national origin, sex (including gender identity and sexual orientation), disability, age, or reprisal or retaliation for prior civil rights activity.

Program information may be made available in languages other than English. Persons with disabilities who require alternative means of communication to obtain program information (e.g., Braille, large print, audiotape, American Sign Language), should contact the responsible state or local agency that administers the program or USDA's TARGET Center at (202) 720-2600 (voice and TTY) or contact USDA through the Federal Relay Service at (800) 877-8339.

To file a program discrimination complaint, a Complainant should complete a Form AD-3027, USDA Program Discrimination Complaint Form which can be obtained online at: https://www.usda.gov/sites/default/files/documents/ad-3027.pdf, from any USDA office, by calling (866) 632-9992, or by writing a letter addressed to USDA. The letter must contain the complainant's name, address, telephone number, and a written description of the alleged discriminatory action in sufficient detail to inform the Assistant Secretary for Civil Rights (ASCR) about the nature and date of an alleged civil rights violation. The completed AD-3027 form or letter must be submitted 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; or
2. fax: (833) 256-1665 or (202) 690-7442; or
3. email: program.intake@usda.gov

This institution is an equal opportunity provider.

The procurement methods to be used (micro-purchase, small purchase, formal, and their dollar thresholds)

Required: Micro Purchasing: Threshold of $5,000 or less

Micro-purchases may be awarded without soliciting competitive price or rate quotations if the recipient or subrecipient considers the price reasonable based on research, experience, purchase history, or other information; and maintains documents to support its conclusion. Purchase cards may be used as a method of payment for micro-purchases.

The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold defined in 2 CFR 200.1. To the extent practicable, the recipient or subrecipient should distribute micro-purchases equitably among qualified suppliers.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Administrative Assistant
- Head of School
- Board Treasurer
- Creative Planning financial controllers

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- At time of request
- At time of reimbursement submission
- At time of approval of payments
- Finance Committee meetings review of registers

The sponsoring authority's appointed officials will ensure compliance in Micro Purchasing in the following way(s):

- Requisition for submission
- Reimbursement for submission
- Approval of payments on Bill.com
- Review of Supplemental Financial data by the Finance Committee
- Review of Financials at monthly school board meetings

Required: Small Purchasing: Threshold $5,000 - $25,000

The aggregate dollar amount of the procurement transaction is higher than the micro-purchase threshold but does not exceed the Simplified Acquisition Threshold (SAT). Price or rate quotations must be obtained from an adequate number (**at least two**) of qualified sources. Purchase is awarded to the bidder whose bid/price conforms with all the material terms and conditions and is the lowest in price.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure compliance in Small Purchasing in the following way(s):

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Formal Procurement: Higher than $25,000

All Food Service Management Company (FSMC) procurement must be completed as formal procurement regardless of the size of the contract.

Sponsoring Authorities are responsible for ensuring that the required contract provisions are in the final contract:

- Contract provisions as required in Appendix II to 2 CFR 200;
- Contract provisions as required in 7 CFR 210.21(f) for all cost reimbursable contracts;
- Contract provisions as required in 7 CFR 210.16(a) (1-10) and 7 CFR 250.53 for food service management company contracts.

There are two methods a sponsoring authority can choose to utilize: Invitation for Bid (IFB) or Request for Proposal (RFP)

IFBs: When utilizing the IFB method, bids are publicly solicited (once per week for two weeks) through an invitation. A firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid conforms with all the material terms and conditions of the invitation and is the lowest in price. For sealed bidding to be feasible, the following conditions should be present:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders have been identified as willing and able to compete effectively for the business.
- The procurement lends itself to a firm fixed-price contract, and the selection of the successful bidder can be made principally based on price.

IFB timeline and steps:

- Perform a Cost/Price Analysis: Research current market conditions.
- Develop specifications for the purchase.
- Identify potential suppliers to contact.
- Publish the Invitation for Bid (IFB) opportunity and provide the IFB to all interested suppliers.
- Complete a public notification of the IFB opportunity at least once per week for two weeks if purchase price is above SAT.
- Ensure the IFB is directly mailed or emailed to at least two suppliers.
- Hold a pre-bid meeting: Must be at least two weeks prior to Proposal due date.
- Offer an appropriate Question and Answer timeframe (the week following the pre-bid meeting): All questions and answers need be provided to all bidders in writing.
- Timestamp bids as they are received.
- Open bids publicly on the specified date and time.
- Award contract to lowest priced responsive and responsible bidder.
- Maintain documentation from all bidders and IFB Process.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure compliance in its IFB processes in the following way(s):

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

RFPs:

This procurement method is used when conditions are not appropriate for entertaining sealed bids. This procurement method may result in either a fixed-price or cost-reimbursement contract. The contract is awarded in accordance with the following requirements:

- Requests for proposals require public notice via local newspaper (at least once per week for two weeks), and all evaluation factors and their relative importance must be identified. Proposals must be solicited from multiple qualified entities (**at least two**). To the maximum extent practicable, any proposals submitted in response to the public notice must be considered.
- The recipient or subrecipient must have written procedures for conducting technical evaluations and making selections.
- Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the recipient or subrecipient considering price and other factors.

RFP Timeline:

- Perform a Cost/Price Analysis: Research current market conditions.
- Develop product and technical specifications for the purchase.
- Develop evaluation criteria.
- Identify potential suppliers to contact.
- Publish the Request for Proposal (RFP) opportunity and provide the RFP to all interested suppliers.
- Public notification of the bid opportunity is required for at least once per week for two weeks if above SAT.
- A Sponsoring Authority's RFP may also be posted on its website but must be directly mailed or emailed to at least two suppliers.
- Hold a pre-proposal meeting at least two weeks prior to the proposal due date.
- Question and Answer timeframe (the week following the pre-proposal meeting): All questions and answers need be provided to all bidders in writing.
- Timestamp proposals as they are received.
- Evaluate all RFP's received by the due date and time. Evaluation should be completed by at least three different persons.

- Negotiation with top scoring proposal is allowed.
- Award contract to the most advantageous proposal.
- Maintain documentation from all bidders and RFP Process.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure compliance in its RFP processes in the following way(s):

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Noncompetitive Proposal Procedures:

If items are available only from a single source when the award of a contract is not feasible under small purchase or formal procurement, noncompetitive proposal procedures can be used.

- Written Specifications will be prepared and provided to the vendor.
- The Head of School will be responsible for the documentation of records demonstrating the decision to use the non-competitive proposal.
- The Head of School will be responsible for documentation that the actual product of service specified was received.
- The Head of School will be responsible for reviewing the procedures to be certain all requirements for using single source or non-competitive proposals are met.

Required Action: Costs incurred must be necessary and cost-effective.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure that costs incurred are necessary and cost-effective in the following way(s):

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Action: Avoid the acquisition of unnecessary or duplicative items.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure the organization avoids the acquisition of unnecessary or duplicative items by doing the following:

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Action: Procurement transactions must provide full and open competition.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure that procurement transactions provide full and open competition by doing the following:

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Action: SFA must maintain records sufficient to detail the history of procurement. Minimum of three years after final payment.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure they maintain records sufficient to detail the history of procurement by doing the following:

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Action: Solicitations must incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured by taking the following actions:

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Required Action: Solicitations must identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Board Treasurer

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- When the procurement process is triggered
- Upon review of submissions
- Upon final signing of any contracts
- Board/Finance Committee approval

The sponsoring authority's appointed officials will ensure that solicitations identify all requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals by taking the following actions:

- Following policy when procurement is requited
- Finance Committee or Board review/approval
- Head of School updating the procurement recording spreadsheet

Buy American:

School food authorities (SFAs) must purchase domestic agricultural commodities and food products. For foods that are unprocessed, the agricultural commodities must be domestic, and for foods that are processed, they must be processed domestically using domestic agricultural food components that are comprised of over 51 percent domestically grown items, by weight or volume. A domestic creditable food component is the portion that counts toward a reimbursable school meal (meats/meat alternates, grains, vegetables, fruits, and fluid milk).

SFA requires suppliers to attest that their final food products are either 100 percent domestic commodities or a food product containing over 51 percent domestic food components, by weight or volume.

The limit on the percent of total commercial food costs from non-domestic foods will be phased in over seven school years.

- Beginning in SY 2025-26, the non-domestic food purchases cap will be 10 percent.
- Beginning in SY 2028-29, the non-domestic food purchases cap will be 8 percent.
- Beginning in SY 2031-32, the non-domestic food purchases cap will be 5 percent.

SFA requires suppliers to document the consideration of domestic alternative foods before approving an exception.

When an exception is approved, SFA requires suppliers to document and demonstrate one of the following:

- The product is listed on the Federal Acquisitions Regulations Non-available
- The food or food product is not produced or manufactured in the United States in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the cost of a United States food or food product is significantly higher than the non- domestic product.

The following sponsoring authority officials are responsible for ensuring compliance (Positions/Titles):

- Head of School
- Food Service Director

The sponsoring authority's appointed officials will ensure compliance at the following time(s):

- At time of order/purchase
- Ongoing updates/meetings with contracted food vendor

The sponsoring authority's appointed officials will ensure that the SFA adheres to Buy American by doing the following:

- Working with contracted vendor to attend meetings/webinars, identifying the ways they are notating what items are available under the Buy American Designation
- Ongoing communication with vendor to learn about new offerings they may be cycling in to meet this requirement-staying informed.

SFA Specific Requirements:

If an SFA has an additional requirements or expectations beyond what is federally required, they may add them here. SFA requirements **must** follow federal and state regulation and may not contradict either federal or state regulation.

- None at this time