

USDA COOPERATIVE AGREEMENT

Procurement Practices in School Meals: Making Real Change Work for Healthier Families

60-DAY TECHNICAL REPORT

October 1, 2023 - March 30, 2024



Table of Contents

About the Cooperative Agreement3
Project Scope and Phases
Collaboration and Partnerships3
Introduction4
Objectives for Cooperative Agreement4
I. Phase 1: Investigative Phase- Create an Advisory Procurement Work Group
II. Phase 1: Investigative Phase- Procurement Research/Training Development
III. Phase 2: Piloting Change- Develop a Bid Template
IV. Phase 2: Piloting Change- Conduct Team-Up/Procurement Training
V. Phase 2: Piloting Change- Webinars for Local Producers
Long-Term and Short-Term Goals5
Advisory Procurement Workgroup: Identifying School Procurement Pain Points5
Connecting to the Procurement Pain Points through Training: TeamUp Utah for Value-Based
Procurement Focusing on Quality, not Quantity6
Executive Summary of Project Progress6
Action Plan Development6
Snapshot of Deliverables9
Action Plan and Next Steps10
Appendices11

I. ABOUT THE COOPERATIVE AGREEMENT

1.1 PROJECT SCOPE AND PHASES

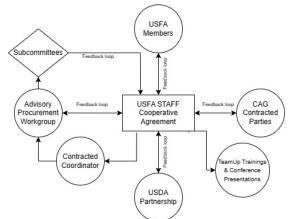
This project seeks to improve procurement practices for districts of all sizes in urban and rural areas. Through the review and assessment of current rules, practices, and training materials, including the expertise of stakeholders involved all along the supply chain, this project will provide School Nutrition Leaders with easy-touse procurement tools and a voice in the process. There are three phases of this project moving forward:

- I. Phase One: Investigative
 - A. Create an Advisory Procurement Workgroup¹ of diverse stakeholders to speak into the work; Review procurement rules at federal, state, and local levels; Review procurement training available and identify gaps.
- II. Phase Two: Development
 - A. Develop a national bid template; Develop procurement trainings to address identified gaps; Conduct TeamUp trainings around the country relating to procurement; Develop a toolkit for hosting a local producer webinar; Produce webinars with school districts.
- III. Phase Three: Piloting Change
 - A. Conduct Pilots with districts, state agencies, and regional offices committed to trying new ways of procuring school food using the information gathered from the project; Prepare a proposal for a new school food procurement business plan to USDA/Congress.

1.2 COLLABORATION AND PARTNERSHIPS

Collaboration with diverse groups of stakeholders is critical to this Cooperative Agreement's success. The diagram in this section includes a snapshot of the Urban School Food Alliance's (USFA) Cooperate Agreement

collaborative relationships. This will expand as collaboration grows throughout this Cooperative Agreement. One of the key collaborative relationships of this Cooperative Agreement was organized by USFA Senior Staff as the Advisory Procurement Workgroup (APWG). The purpose of this workgroup is to identify the top 6 pain points in school food procurement from the viewpoint of each member; identify action steps needed to reduce these issues; identify topics for training; and provide feedback on project-related items.



This workgroup includes a diverse array of stakeholders: small, medium, and large district representation; state agency representatives; a buying cooperative director,

USDA foods processors, and a small processor that is challenged to get into the school marketplace, American Commodity Distribution Association (ACDA), Association of School Business Officials (ASBOINtl), and School Nutrition Association (SNA) representatives, large and small distributors, and the Harvard University School of Business. USFA is also collaborating with various stakeholders to participate in subcommittees associated with the work of the Advisory Procurement Workgroup. The following subcommittees have been selected by USFA Senior Staff:

- I. State Agency
- II. School Food Authorities
- III. SNA State Directors
- IV. Industry
- V. Urban School Food Alliance Members
- VI. Outside Stakeholders

The primary goal for subcommittees is to represent their stakeholder group and provide feedback on different elements of the project to ensure that all members of the school nutrition procurement and supply chain are

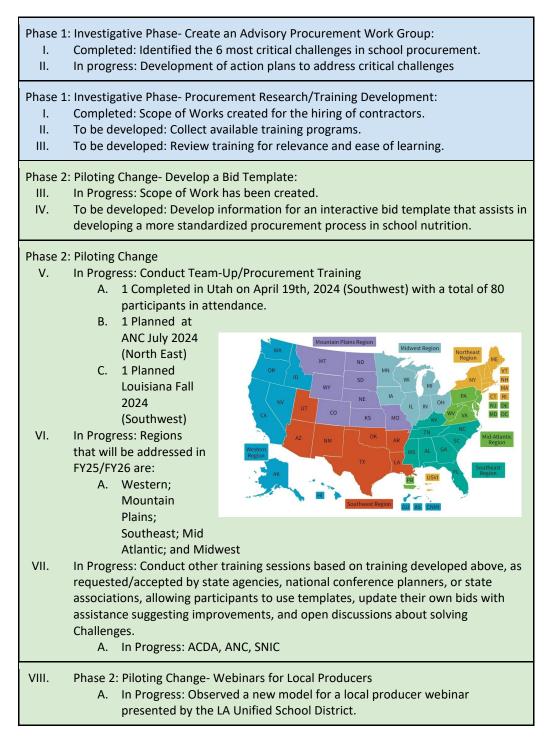
¹ The Advisory Procurement Workgroup was selected by USFA Senior Staff in December of 2023.

well represented. USFA anticipates seeking project feedback from the subcommittees through email and online surveys.

II. INTRODUCTION

2.1 FY24 COOPERATIVE AGREEMENT: Objectives for the Cooperative Agreement

The following objectives are in progress for Year 1, 2024, of the Cooperative Agreement. Phases 1 and 2 are planned and in motion for the first year of the grant. Some additional objectives and phases have been created for the 2025-2026 Cooperative Agreement years and they will appear in subsequent technical reports.



2.2 SHORT TERM & LONG TERM GOALS: Cooperative Agreement 2024 Grant Year

Short Term Goals	Long Term Goals
Establishing the Advisory Procurement Workgroup and subcommittee selection.	Working to identify specific issues in school food procurement that can be catalysts to overall change. (Continuous)
Identifying the top 6 pain points for school food procurement.	Developing a plan of action based on the top 6 pain points to include a recommended set of training materials available or redeveloped on specific topics in procurement.
Developing scopes of work for the research, training, and different aspects of contracted work for this grant.	Developing research and surveys associated with Phase 2 of the Cooperative Agreement.
Announcing the creation of the Cooperative Agreement throughout USFA networks to build awareness of this project and its purpose.	Working to develop content for a new universal bid template for school food procurement.
Identifying school regions for bid template pilots in alignment with the Cooperative Agreement.	Utilizing the Advisory Procurement Workgroup to share their feedback on project progress.

2.3 ADVISORY PROCUREMENT WORKGROUP: Identifying School Procurement Pain Points

The Advisory Procurement Workgroup (APWG) was established in December of 2023 and began its work with a two-day in-person meeting from February 21-22, 2024. During this inaugural APWG meeting, each Workgroup member was instructed² to identify six procurement-specific pain points; each pain point was on a separate sticky note on the whiteboards. This exercise generated 109 responses. During a break in the meeting, USFA staff sorted the 109 Pain Points into 14 broad categories; many of the pain points applied to multiple categories. Each table was asked to determine their top six Pain Points, resulting in a reduction of Pain Points to 30 which was further reduced to 20 due to duplicative priorities. Each member was given dots to vote on the top procurement issues resulting in the top six procurement Pain Points:

109 Individual Pain Points

14 Categories

30 Priority Pain Points Reduced to 20 (duplication)

6 Pain Points

- 1. Lack of State/federal/local alignment
- 2. School districts must compete in the food service sector
- 3. Electronic bid process/technology
- 4. Training
- 5. Forecasting
- 6. Regulation complexity

² Please see page 11, Appendices I, for further details of voting.

Since the inaugural meeting and voting on the top 6 procurement pain points, there has been ample engagement from the Workgroup members. In preparation for the initial meeting, over 50% of Workgroup members shared resources for the Workgroup to view and utilize. Since the February meeting, an additional 30% of Workgroup members have reached out with further items to share with the project team and other workgroup members.

2.4 CONNECTING TO THE TOP 6 PROCUREMENT PAIN POINTS THROUGH TRAINING: TeamUp Utah for Value-Based Procurement Focusing on Quality, not Quantity

USFA scheduled the first Cooperative Agreement TeamUp on April 19, 2024, in Sandy, UT. The topic of the training ties into the 6 pain points identified by the Advisory Procurement Workgroup. By focusing on procurement training such as this TeamUp, USFA staff continue the work of the Cooperative Agreement. There were 80 participants in attendance at this TeamUp training. This training was developed in collaboration between the USFA staff and the Utah State Board of Education, Child Nutrition Department. The purpose of this TeamUp was to focus the training on Value-based procurement and developing ideas and strategies for focusing on quality, not quantity for school food procurement. During this TeamUp participants were offered the training to:

- A. Understand how value-based procurement in school food service can improve the quality of food and strengthen community food systems.
- B. Identify steps to take to increase value-based procurement practices.
- C. Identify food categories for beginning value-based procurement language in solicitations.
- D. Practice developing value-based procurement solicitations specific to individual districts.
- E. Discuss the idea of developing solicitations awarding vendors based on the quality of food available rather than the lowest price point.
- F. Practice developing solicitation award percentages for quality over price.
- II. Expert Panelists³ that will present on Value-Based Procurement Practices:
 - A. Miguel Villarreal, MBA, Interim Co-Executive Director, National Farm to School Network
 - B. Bertrand Weber, Director, Culinary and Wellness Services, Minneapolis Public Schools, USFA Advisory Procurement Workgroup Member
 - C. Jo Dawson, MS, SNS, Child Nutrition Consultant formerly with the Child Nutrition Programs at the Alaska Department of Education and Early Development
- III. Utah Panelists that will present on Value-Based Procurement Practices:
 - A. Kelly Orton, SFS, MBA, Director of Child Nutrition, Salt Lake City School District
 - B. Paula Loveland, CNP Supervisor, Iron County School District
 - C. Marci Johnson, Foods Director, Reagan Academy

III. EXECUTIVE SUMMARY OF PROJECT PROGRESS

3.1 Action Plan Development

During the Advisory Procurement Workgroup's inaugural meeting, members identified, by school nutrition procurement supply chain segment, suggested goals and action items to address the 6 Pain Points and recommended steps to resolve or mitigate the issues with action items. The items described below are suggestions written by the Advisory Procurement Workgroup that will be considered when USFA finalizes the Action Plan.

Lack of state/federal/local alignment Suggested Goals:

- Unify under the Dept of Ag; USDA should be the sole interpreter of the rules.
- To produce materials the USDA can provide to the state agencies and areas when there is flexibility.

³ See Appendices III for Expert Panelist bios.

- Need clarity on who (fed, state, school board) is setting the rules to empower practitioners to advocate for change/alignment.
- Process flow chart for procurement regulations rules (fed/state/local) included in training on procurement template.
- USDA reviews state policies over federal, and where they find it overly restrictive, change it (i.e. USDA foods use/entitlement).

Suggested Action Items:

- USDA requires States to submit their procurement regulations for schools. Review for overly restrictive policies that may limit districts' use of entitlement funds.
- Look at the current flow chart for the current reporting/regulation process. Revise the flow chart to the desired reporting & process.
- Workgroup to further define/identify areas where there is no alignment & scope out what topics/types of materials would be relevant with an emphasis on flexibility.

Create a best practice school nutrition procurement model to make SFAs a better customer (revised from School districts must compete in the food service sector) Suggested Goals:

- Incentivize the use of best practices to allow states to create training resources instead of only regulatory compliance.
- Forecasting is the single most important action SFAs can take to improve procurement (forecasting template).
- Promote RFPs over low-priced bids. Train on writing goal RFP and understanding who you are doing business with.
- Improve everyone's understanding of their place in the supply chain and the needs of others' roles.
- BVTO v LCTA: elevate other than price, procurement award methods as opposed to low cost.

Suggested Action Items:

- Brainstorm incentives states can provide to SFAs to adopt best practices.
- By consensus, identify best practices from stakeholders that can be implemented.

Electronic Bid Process/Technology

Suggested Goals:

- Standardization of universal bid components (i.e. federal requirements). Using this tool assures SFAs are covered/compliant.
- Training support for SFAs.
- Incentive to use and remove punitive compliance instances.
- Elements of an electronic marketplace accessible to all.
- Includes a 50-state component (+ territories) that can be regularly updated (i.e. a living resource) with long-term investment & IT support – like a Turbo Tax interface but with universal open access (no or low fee).
- Include a suggested bid timeline by bid category and forecast template linked to the bid template.

Suggested Action items:

- Conduct a gap analysis/current state analysis of what currently exists and where are the gaps.
- Procurement rules/template; Directory of suppliers (marketplace); Technology compatibility with USDA's capacity.
- Identify the current tools that exist that can be used to create the "turbo tax" model (i.e. region 10's tools, LA Unified).
- Explore existing software companies that could integrate inventory management, menu planning, nutritional analysis, etc to assist in forecasting/populating templates.

 Committee to identify a defined list of federal procurement requirements and create a standardized document, USDA certified (i.e. if SFA uses template = CN label, they are safe).

Training

Suggested Goals:

- Precision topic-specific training on procurement best practices with training tools widely distributed and on-demand.
- Deeper understanding of the supply chain from beginning to end.
- Utilize ICN, SNA, and state programs to incentivize training with a unified message, clearly defined.
- The USDA creates procurement/sales-specific CEU training for the entire supply chain. User/seller/buyer has free annual CEU requirements.
- USDA houses the repository of best practices & training for all sectors of the industry and has someone vet it and organize it into subjects (work with ACDA on this).

Suggested Action Items:

- Create a subcommittee/task force; Assess/identify specific training needs; Evaluate current training available; Identify current training available; Identify USDA experts/resources/capacity to evaluate training content; Map out all stakeholders in the supply chain who need training.
- Identify the procurement experts, and create best practices for common curriculum creation, in addition to USDA; Identify knowledge gaps in training.
- The committee evaluates available trainings, assesses what is missing, and works towards creating training for all segments.
- Create training materials based on input from partners that apply to SFAs, agencies, distributors, & manufacturers.

Forecasting

Suggested Goals:

- Incentives, rather than punitive action use USFA's template get a pass on something on AR per USDA.
- Have tools and Resources for schools; Create a uniform forecast template with all the information manufacturers and distributors need to meet demand.
- Template for operators to use for forecasting that includes the ability to show historical data, and meal service (i.e. universal) that is shared with manufacturers and distributors; Required for SFAs using a simple, standardized system with access to data and training.
- Education around why forecasting is important and aligning forecasting better with reality; commitment to buy. Include scenarios that impact meal participation.

Suggested Action Items:

- Form a subcommittee for template creation.
- Stakeholder input for items to include in the template.
- Procurement timeline creation; best practices for all stakeholders.
- Identify tools and training already out there to create a common curriculum.
- Form multiple committees to address the needs of all parties.
- SFAs are required to do forecasting as part of the procurement process using the forecasting tool (refer to training suggested on forecasting).
- Put together materials to educate why forecasting is important.

Regulation complexity

Suggested Goals:

• Building alternatives to low-cost bidding.

- How are we educating & what platforms are we using?
- Identify specific antiquated regulations at the federal, state, and local levels, that can be changed/improved/removed; Regulatory template similar to the National Processing Agreement, manufacturers/distributors can get certified for compliance with federal requirements; Create a solicitation packet that mimics the AMS Master Solicitation of federal requirements.
- Add a regulatory requirement that each state create a template of state requirements.
- Clear, concise, and relevant to the goal of feeding children.

Suggested Action Items:

- Creating a task force to identify antiquated regulations at the federal level
- Identifying categories
- No purposes/outdated
- Burden outweighs value
- Focusing on priorities essential to the program (pilot at some SFAs)
- Developing best practices and education material that help stakeholders understand/empower to use criteria other than price for award
- Coordinate with template and training
- Creating an education campaign that debunks "lowest cost" has to be the sole reason to award the bid. Need to debunk the "lowest cost" assumption

3.2 Snapshot of Deliverables: October 1, 2023 - March 30, 2024

The Cooperative Agreement has completed Q4 2023, Q1 2024, and Q2 2024. During these quarters, the Urban School Food Alliance completed a series of deliverables associated with project goals and objectives. The completed Cooperative Agreement Deliverables include but are not limited to, the following:

- I. Development of the Cooperative Agreement grant overview.
- II. Development of the content for public relations and communications about the Cooperative Agreement.
- III. Establishment of the Advisory Procurement Workgroup membership list.
- IV. Creation and presentation of a PowerPoint about the Cooperative Agreement.
- V. Creation of a final procurement assessment tool to share widely across USFA networks.
- VI. Completion of the First Annual in-person Advisory Procurement Workgroup event.
- VII. Objective Establishment of the Top 6 Pain Points in School Food Procurement.
- VIII. USFA Senior staff established a date for the initial Advisory Procurement Workgroup (APW) gathering and set the contract with the hotel.
- IX. USFA staff confirmed the hotel/dates to be shared with staff and APW members.
- X. USFA hired a consultant to manage the work of the APW.
- XI. USFA hired the Cooperative Agreement Administrator.
- XII. Creation of the agenda for the APW event.
- XIII. USFA invited members of the APW to the initial in-person meeting on February 20-22, 2024.
- XIV. USFA hosted and completed the first in-person meeting for the Advisory Procurement Workgroup.
- XV. As a part of Q2/3 and after the first in-person meeting of the Workgroup, USFA identified subcommittees that will include other participants who will provide feedback as needed.
- XVI. Completion of Scope of Works for Research and Survey development for Contracted parties.
- XVII. USFA completed the new Cooperative Agreement Webpage.
- XVIII. Completion of the Advisory Procurement Workgroup Meeting Summary from the February event.
- XIX. Establishment of the initial subcommittees for the Cooperative Agreement.
- XX. TeamUp April 19, 2024, in Sandy, Utah with the focus of "Value-Based Procurement Practices: Focusing on Quality, not Quantity," with a total of 80 participants.
- XXI. TeamUp ANC planning is underway for July 2024.

4. Action Plan and Next Steps

Investigative Phase		
-Scope of work finalization for Bid Template contractors. -Subcommittee Establishment. -Advisory Procurement Workgroup August 2024 Virtual Meeting. -Procurement Training Needs Survey Development. -Investigative Procurement Research Project.	Development Phase -TeamUp Training in Sandy, Utah, April 2024. -USFA @ ACDA -TeamUp Training at ANC, July, 2024. -TeamUp Training in Louisiana, November 2024. -Universal Bid Template content creation.	-Working with Contracted parties to pilot the new content for the Universal Bid Tempalte. -February 2025 Advisory Procurement Workgroup In- person meeting. -Feedback requests sent to the APWorkgroup and Subcommittees as needed.

The above graphic showcases a snapshot of the upcoming next steps for the Cooperative Agreement. The Action plan for this Cooperative Agreement is currently in development. As the work progresses, USFA will continue to track how project deliverables tie into the top 6 pain points established by the Advisory Procurement Workgroup. Currently, USFA is addressing the following pain points with specific action items:

- I. Pain Point: Training
 - a. TeamUp training in Utah, April, 2024 (Value-Based Procurement)
 - b. TeamUp training at ANC, July, 2024 (Forecasting)
 - c. TeamUp training in Louisiana, November, 2024 (TBD)
- II. Pain Point: Ebid Process/Technology Development
 - a. Scope of Work created for Bid Template content development
- III. Pain Point: Forecasting
 - a. TeamUp Training at ANC, July 2024 in Forecasting

In addition to this work, contractors will begin to work on reviewing procurement rules at federal, state, and local levels while reviewing procurement training available to identify gaps. Finally, this project aims to utilize all elements of action plans and project management plans developed, to improve procurement practices for districts of all sizes in urban and rural areas. We look forward to continuing to share project progress as the Cooperative Agreement develops.

Table 1: Pain Points, Prioritized by Table, Voted by All	Duplicate	Vote
Table 1		
Bid process	x	1
Federal, state, and local alignment		12
Complexity of procurement regulations		13
Training needs		6
Electronic bid process		5
School districts must compete in the food service sector/business model/profit logistics/long term contract, flexibility (be a good partner/customer)		12
Table 2		
Overreliance on low-cost		10
Diversity of schools based on size and location		1
Lack of consistency w/ state agencies		7
Lack of procurement training		3
Bid process with antiquated non-value-added steps/procedures		7
No room for small/local/regional producers		7
Table 3		
Identify all players & individual needs to assist in the collective priority to feed & nourish students		11
Technology & GDSN integrate w/ SFAs, Distributors, manufacturers	x	8
Education & Training: exposure to products; tech solution needed	x	4
Distribution and manufacture disconnect		0
Consistent federal program implemented across 50 kingdoms	x	9
Procurement process	x	1

Channels of restrictive distribution that limit access to multiple brand options		1	
Best practices/training beyond regulations (less regulation)	x	0	
Inability of FSDs to educate superiors on purchase decisions. Easy to make decision on lowest price		0	
Poor procedures, needless redundancy. Respond with "x" number of copies. Updated.		0	
Lack of understanding of the private sector (i.e. cost of bid response, investments made, no long-term commitment, SFAs need to respect contracts entered		6	
Forecasting, communication		1	
Table 5			
Time/Tools for proper procurement		7	
Procurement rules: Federal/state/local	x	2	1
Partnerships/flexibility between schools, manufacturers, distributors	х	0	
Lack of forecasting to distributor/manufacturer		14	
Procurement training at all levels	x	3	1
Specialized CN products not in commercial market	x	0	I

Appendices II: Advisory Procurement Workgroup Member List

Mike Birkmeyer, Maryland State Department of Education; Laura Bruno, RD, SNS, Buena Vista Foods; Deborah Cameron, Colorado Department of Human Services (ACDA); Moss Crutchfield, CEC, SNS, Epping School District, New Hampshire; Christopher Derico, SNS, Barbour County Schools, West Virginia; Vanessa Hayes, Tift County Schools, Alabama; Brian Hofmeier, JTM Food Group; Lynelle Johnson, LRD, SNS, North Dakota Department of Public; Steven Jones, Future Harvest; Glennis Kitzrow, IFD Foodservice Distributor; Everett Kuglar, Rich Chicks; Sunil Kumar, The Amazing Chickpea; Cliff Meyers, ClearVu; Nicole Nicoloff, Sysco; Josh Nunnally, Tennessee Department of Education; Rob Rosado, International Dairy Foods Association; Manish Singh, LA Unified School District; Keri Warnick, Multi-Region Purchasing Cooperative/Region 10; Bertrand Weber, Minneapolis Public Schools, Minnesota School Food Authority; Elena Hoffnagle, Harvard University Government Performance Lab; Elleka Yost sitting in for Christina Berta MBA, SFO, ASBO International/Hanover County Public Schools Association of School Business Officials; and Alex Dinovo, DNO Produce

Appendices III: TeamUp Utah Expert Panelist Bios

Miguel Villarreal, MBA, Interim Co-Executive Director, National Farm to School Network: With over 30+ years' experience as a School Food Service Director in public schools in Texas and California, Miguel pioneered locally grown food in schools, plant-based meals, and removing highly processed foods from the school menu. His innovative broad-based community model and established credibility among many collaborative partners, including school groups, community allied groups, health allied organizations, farmers, local and national policymakers, state and national allied organizations, and foundations gave his programs a high degree of success that supported and contributed to the efforts of creating sustainable, equitable, nutrition and wellness environments in schools and community. He serves on numerous local, state, and national Boards focused on improving the Culture of Wellness in communities. He currently serves as the Interim Co-Executive Director for the National Farm to School Network.

Bertrand Weber, Director, Culinary and Wellness Services, Minneapolis Public Schools, USFA Advisory Procurement Workgroup Member: Bertrand Weber's career spans over 40 years of combined management experience in the hospitality industry and school food service. Trained in hotel management, Bertrand has managed some of the finest hotels and resorts on the East Coast. His compassion for the well-being and future of our children and our environment led Bertrand to the Hopkins School District, Minnesota in 2003. Bertrand's progressive thinking at Hopkins received national recognition. His efforts were the focus of several University of Minnesota research papers. In 2004 he initiated one of Minnesota's first Farm to School Programs which led to another research paper in 2005 "Making the Farm to School Connection" Currently, he is the Director for Minneapolis Public School Culinary and Wellness Services since January 2012. Bertrand initiated rethinking MPS School Lunch in 2013, Market Cart Salad Bars have been introduced in every school, and all 7 high schools, 5 Junior High Schools and 40 elementary schools have returned to scratch cooking with 3 more scheduled for the 2023-2024 school year. MPS is on the leading edge of the Farm to School movement contracting forward with over 14 local farms. Bertrand introduced MN Thursday in 2014 which features lunch sourced 100% from Minnesota. Bertrand has served as the lead District of School Food Focus Midwest, Chair of SNA Major City Committee Chair and Advisory Board Member of the National Farm to School Network and SNA Professional Development Committee. Currently, Bertrand participates as a member of IFMA K-12 Advisory Council, Chef Ann Foundation Lunch Box, School Nutrition Culinary Institute Advisory Board & Scratch Works.

Jo Dawson, MS, SNS, Child Nutrition Consultant: Jo Dawson currently is a Child Nutrition Consultant and the Contractor for the Advisory Procurement Work Group for the Urban School Food Alliance; before this role, Jo spent eighteen years with the Child Nutrition Programs at the Alaska Department of Education and Early Development. In her tenure there, she coordinated various programs including the NSLP, the CACFP, and USDA Foods/TEFAP before becoming the state director for eleven years. Jo's goals as state director were customer service orientation and the development of resources and tools to be successful, particularly for the rural communities. Ms. Dawson is a former president of the Alaska School Nutrition Association and nominated twice for the Governor's Denali Award for Leadership. Jo has a Bachelor of Science in Business Management and a Master of Science in Management & Leadership. Jo has served on the School Nutrition Association Professional Standards Committee and State Agency Advisory Council. During this time, Jo also owned and operated the only ServSafe training and certification business in Southeast Alaska. A lifelong Alaskan, Jo recently retired from the state agency and relocated to Georgia with her husband and their youngest daughter where they enjoy the best winters ever. In addition to her work as a Child Nutrition Consultant, Jo sits on the Georgia Grown Trail 17 board to support agrotourism in coastal Georgia.