

# Feeding the Nation's Children:

## Challenges and Opportunities Related to School Food Procurement Regulations

Report prepared for the Urban School Food Alliance  
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Authors: Pamela Portocarrero, Elena Hoffnagle, Christine DuBois, and Laura Merryfield  
Contributors: Kailey Burger Ayogu, Sara Israelsen-Hartley, and Analisa Sorrells



**HARVARD Kennedy School**  
Government Performance Lab



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# I. Executive Summary

In collaboration with the Urban School Food Alliance, the Government Performance Lab (GPL) at the Harvard Kennedy School sought to map the current state of school food procurement rules and regulations at both the federal and state level. We aimed to assess the overall impact of these regulations on (1) School Food Authorities (SFAs), especially as they navigate complex layers of regulations and (2) vendors, including producers, distributors, and processors, who may face barriers in participating in procurements.

Our research focused on a scan of state websites from a sample of 21 randomly chosen states across each of the seven USDA Food and Nutrition Services (FNS) regions. Because state websites are likely a core source of information for SFAs, our research approach is representative of what SFAs, or other practitioners, might find when aiming to understand regulations. We identified three major categories of findings:

- **Differing rules** among states — and between the federal government and states — impact all aspects of school food procurement. For example, we found that most states had dollar thresholds for purchasing methods lower than federal limits, and many states prescribe different ways of conducting certain types of purchases, even if the procurement vehicles (e.g., RFPs, ITBs) remained consistent from state to state. Information on procurement dollar thresholds was extremely difficult to find in many of the states sampled.
- There is an opportunity for many states to improve the **information and training** made available on their websites. In some states, we found robust training offerings, helpful templates and models, and easy-to-navigate, consistent resources. Other states offer limited information around how to navigate procurement regulations, and few states offered training on general best practices in procurement, such as conducting market research or negotiating contracts.
- Barriers to engagement and antiquated processes create a **reduced vendor pool** for SFAs. For instance, many states have statutes requiring that bids be advertised in a newspaper of record, even as the larger procurement industry moves fully online and vendors who work across states struggle to stay informed or find opportunities.

Promisingly, we identified that many states are deploying innovative approaches to solve challenges related to procurement, developing robust training resources to aid SFAs and local school food purchasers, and updated policies to increase local purchasing, boosting economic development.

We see substantial opportunities for state agencies overseeing child nutrition programs to improve their public-facing communication and available resources for SFAs, revisit their procurement thresholds and other procurement practices in comparison to peer states and the federal government, and improve accessibility and navigability of their websites.

We hope this research encourages readers to evaluate where inconsistencies between federal and state regulations — and across states — may be beneficial given unique local goals. At the same time, we acknowledge the complexity these inconsistencies introduce to school food procurement. Furthermore, this report can be a tool for states to identify model practices, trainings, and resources to provide SFAs, based on what peers offer.

## II. Introduction

### A. Background

In fiscal year 2024, the United States Department of Agriculture (USDA) spent over \$17.8 billion to provide 4.8 billion lunches and 2.5 billion breakfasts at over 93,000 public and nonprofit private schools and residential childcare facilities across the country.<sup>1,2</sup> School food programs are federally funded but delivered through local School Food Authorities (SFAs), which operate as self-sustaining enterprises. These enterprises purchase food, pay staff, and maintain equipment.

SFAs face distinct challenges due to the volume, frequency, and complexity of school food procurement as they seek to (1) stay within tight budgets that are increasingly insufficient to cover costs,<sup>3</sup> (2) adhere to federal, state, and local procurement regulations, and (3) support local farmers and businesses.

The Urban School Food Alliance (USFA) is a 501(c)(3) nonprofit that seeks to address these challenges by sharing best practices, developing procurement strategies, and advocating for the health and wellness of students. Through a cooperative agreement with the USDA, called [Procurement Practices in School Meals: Making Real Change Work for Healthier Meals](#), USFA focuses on redesigning the school food procurement process. The goal is to give school nutrition program administrators greater decision-making power, develop processes to build better partnerships with suppliers, and reinvent how the school meal marketplace does business. The cooperative agreement runs from September 2023 to September 2026.

The first phase of the cooperative agreement is focused on investigating challenges across the school procurement landscape and the variation between federal and state regulation. The second phase focuses on reviewing the school food procurement training landscape and identifying gaps in resources. Subsequent phases will focus on developing procurement trainings and templates as well as designing and implementing pilots with school districts to test innovative approaches that will feed into a school food procurement business plan.

**This research report is a core component of the investigation phase of the Cooperative Agreement. It builds off USFA's initial findings that core procurement pain points for SFAs and vendors include a lack of federal, state and local alignment in school procurement rules, and, generally, the overall complexity of regulations.<sup>4</sup>**

### Definitions

The federal definition of a School Food Authority (SFA) is the governing body that primarily sits at the school district level and manages one or more schools' nutrition programs. In some less-populated areas, an SFA may be at the local educational agency (LEA) level or other regional governing jurisdiction. In this report, we use "SFAs" and "districts" interchangeably, and those individuals directly responsible for the day-to-day operations of school food service for all schools under an SFA will be referred as "directors" or "administrators." "Vendors" is used throughout this report as language to describe any firm or organization that an SFA contracts with in the provision of school food, including contractors, suppliers, distributors, processors, producers, and farmers.

## B. Research Objectives

Working in close collaboration with USFA, the Government Performance Lab at the Harvard Kennedy School (GPL) sought to understand the underlying challenges associated with school food procurement, building on themes identified by the USFA's [Advisory Procurement Work Group](#).

This report aims to answer the following research questions:

- How might federal school food procurement rules create unintended barriers for SFAs as they purchase food, equipment, supplies, and services related to child nutrition programs?
- How do state-level rules governing school food procurement vary across the United States? In what ways do state food procurement rules most commonly vary from federal rules?
- What information do state agencies provide as guidance on their websites around school food purchasing? How comprehensive is this information? Do states tend to recommend certain procurement methods in specific circumstances?
- What amount and types of training and informational resources are shared with SFAs on state (or other) websites to demystify and promote capacity building around procurement? Are certain training resources more commonly cited?
- Do any federal or state rules reduce SFAs' ability to engage with a broader pool of suppliers, especially small or local businesses?

## C. Methodology

### *Review of state websites*

State agencies are the link between USDA's Food and Nutrition Services (FNS) and local program operators (i.e., SFAs) and key communicators about federal program requirements. We hypothesized that state agency websites would be a key source of procurement guidance and information for SFAs. However, we also recognize that states may face challenges in their public posting of information, including ensuring that web pages and documents are ADA compliant.

From August 2024 through January 2025, the GPL reviewed a sample of the primary government websites of 21 states. We looked for agencies that administer child nutrition programs (often state departments of education) and state purchasing office websites. States provide procurement guidance by codifying purchasing procedures (either for general state purchases, or school food purchases specifically), creating written content in the form of manuals, guides, and web pages, and offering training videos.

To include a representative range of states in our review, we selected a random sample that included three states from each of the seven USDA Food and Nutrition Services (FNS) regions (see **Appendix 1**). For each of the 21 states, we focused our review on three components:

- Information about procurement thresholds and purchasing methods.
- Links and general availability of training related to school food procurement.
- General availability of resources and overall navigability.



This research relied solely on public-facing sources, without direct contact with state representatives. The report does not include documents, forms, or other information that may live in state agency intranets or member-only platforms, or information sent to SFAs by email or listserv from state agencies.

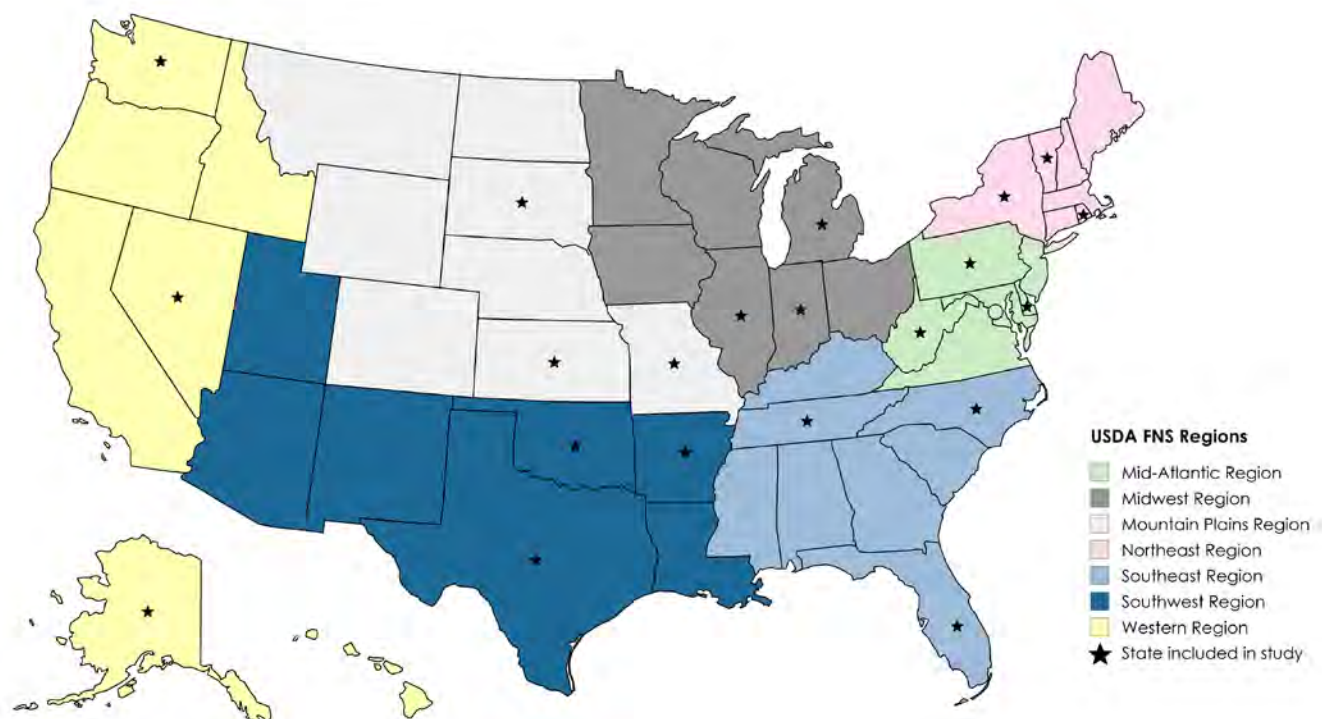
When a state agency linked to or referenced an external resource related to our research questions, we scanned those relevant resources. They were most frequently links to non-profits, associations, and higher-education entities focused on nutrition programs and policy (e.g., the [Institute of Child Nutrition](#) (ICN), University of Illinois Urbana-Champaign, [Oklahoma Farm to School](#)).

### *Review of additional websites*

For purposes of comparison, we reviewed sections of the Code of Federal Regulations (CFR) that relate to child nutrition laws, and USDA web pages pertaining to child nutrition and school food procurement regulations and guidance.

To answer research questions about the general availability of nationwide trainings, we also reviewed USDA and the ICN training offerings. The ICN is part of the School of Applied Sciences at the University of Mississippi and is the only federally funded national center dedicated to applied research, education and training, and technical assistance for child nutrition programs. These two entities were often cited on state agency websites as major deliverers of training and tend to be the basis of many state-produced resources and trainings.

**States studied:** Alaska, Arkansas, Delaware, Florida, Illinois, Indiana, Kansas, Michigan, Missouri, Nevada, New York, North Carolina, Oklahoma, Pennsylvania, Rhode Island, South Dakota, Tennessee, Texas, Vermont, Washington, West Virginia.



### III. Overview: Federal School Food Procurement Regulations

Our research focused first on summarizing core federal procurement regulations, then understanding how state rules interacted with them. In this section, we offer a primer on the federal regulations that impact school food purchasing, as well as where states have flexibility in implementation and additional rulemaking. Our findings, later in this report, build on this landscape, showing specific areas where we saw variation and trends among states.

#### A. Summary of Federal School Food Procurement Regulations

As recipients of federal funding, SFAs must follow the Code of Federal Regulations (CFR).<sup>5</sup> Federal regulations govern which type of procurement methods can be used based on purchase amounts and also provide guidelines for how to conduct procurement processes that are competitive, transparent, and fair.

When federal, state, local, and/or tribal procurement rules conflict, purchases must adhere to the most restrictive provision for each aspect of procurement.

**Conflicting Rules in Practice:** As an example, states may set a “formal purchase” threshold lower than the federal threshold of \$250,000. This lower threshold would likely result in SFAs in that state conducting an additional number of competitive procurements (e.g. full solicitations with written specifications, formal proposals, and negotiations with vendors) since more purchases will fall above the lower threshold. Alternatively, using (the higher) federal threshold could increase speed and efficiency by allowing more purchases to go through an informal procurement process.

Some of the key topics in the federal procurement regulations relevant for SFAs include:

1. **Selecting a procurement method based on purchase amount and type.** The CFR sets dollar thresholds determining when SFAs can use informal procurement methods for small purchases and when they must use formal procurement procedures. The CFR Title 2 Part [200.320](#) defines three procurement methods: 1) informal procurement methods, 2) formal procurement methods, and 3) non-competitive procurement.
2. **Operating procurement processes that are competitive and fair.** SFAs must ensure all solicitations contain clear and accurate descriptions of the technical requirements for the requested material, product, or service. These descriptions cannot contain features which significantly restrict competition. For example, rather than specifying only a “brand name” product, SFAs must allow “an equal” product to be offered.
3. **Maintaining appropriate documentation for all procurements.** SFAs must document procurement decisions, including rationale, contract type selection, contractor choice, and pricing basis.
4. **Aligning with the Buy American policy for school food programs.** SFAs should purchase domestically produced agricultural commodities and processed food products with over 51% domestically grown items by weight or volume as often as possible. The CFR defines requirements for documenting exceptions based on price and availability of domestic products.

5. **Encouraging contract participation from businesses that are small, minority-owned, women-owned, or veteran-owned.** SFAs are encouraged — but not required — to include these business types in solicitation notifications, and to divide procurement scope and transactions into reasonably sized procurements to encourage these business types to participate (often called unbundling). The CFR encourages states and localities to engage with organizations like the Small Business Administration and the Minority Business Development Agency of the Department of Commerce to identify potential bidders and publicize solicitations.
6. **Increasing local food purchases by incorporating geographic preference as selection criteria.** A recent [USDA rule](#) allows SFAs to include selection criteria related to location for unprocessed agricultural commodities. States and districts have flexibility to define “local” to be relatively small or large areas, and they can choose how much to weigh “geographic preference” criteria.

The federal procurement requirements in the CFR ensure SFAs can conduct procurement in ways that align with federal standards for transparency, fairness, open competition, and buying domestic products. The USDA rules and guidelines also provide suggestions for how SFAs can use school food program purchasing to support broader goals such as increasing purchases of local food and supporting a wide array of businesses. States and local governments can then layer on additional policies and practices that influence how an SFA executes purchases and contracts.





## Types of Federal Procurement Methods<sup>6</sup>

The CFR Title 2 Part [200.320](#) defines procurement methods, with the most appropriate method to be determined based on the dollar value of the resulting contract and the nature of the goods or services being solicited. Included in this table are federal acquisition thresholds. More information about these procurement methods is available in **Appendix 2**.

	Informal Procurement Methods		Formal Procurement Methods	
	<i>Micro-purchase</i>	<i>Small Purchase</i>	<i>Sealed Bids (ITB/IFB)</i>	<i>Proposals (RFP)</i>
<b>When to use</b>	Aggregate purchase value below \$10,000	Aggregate purchase value below the applicable simplified acquisition threshold (SAT)* (Federal SAT is \$250,000)	There are complete and realistic requirements for the items to purchase and the contract can be awarded based on price. Purchase will be >\$250,000	For more complex purchases >\$250,000 where factors other than price need to be considered in evaluation criteria
<b>How to receive bids</b>	Contact vendors directly without seeking quotes if price is reasonable	Advertise and solicit quotes by phone, email, or electronic submission	Publicly advertise and receive bids in writing	Publicly advertise and receive proposals in writing
<b>Type of contract</b>	Firm fixed price	Fixed price	Firm fixed price, no negotiation	Fixed price or cost reimbursement, cost negotiation allowed
<b>Example purchase</b>	District purchases small quantities of produce at local farmers market to supplement existing produce purchases.	District writes specifications for tomatoes, then calls and emails several local tomato growers and selects lowest price offer.	District writes specifications for fresh whole apples of specific variety, with price as primary evaluation criteria. District advertises the invitation to bid on its website, evaluates bids, and selects one for award.	District writes specifications for a vended meals service. District advertises RFP on website, evaluates proposals, negotiates with two vendors, and awards one contract.

\* Many states, local governments, and school districts set simplified acquisition thresholds below \$250,000, which take precedence over federal thresholds.

## B. Summary and Justification of Differences between State and Federal Regulations

Though federal regulations set the baseline, states vary in how they implement and interpret these rules and can layer on their own additional rules or regulations. The tables below examine the intersection of federal and state regulations in these areas, along with reasoning why a state might want to set a stricter standard than the federal standard. Our findings later explore the instances where we found that states differ.

1. Procurement methods based on purchase amount and type	
<b>Federal Regulations</b>	<p>Guidance on when to use formal and informal procurement methods based on the size of the contract (micro, small-purchase, large purchase).</p> <p>Non-competitive procurements (also known as sole source) can be used in certain circumstances of emergency, or when items are not available from multiple sources.</p>
<b>State Regulations</b>	<p>States (and local entities) can set small and large purchase thresholds that are lower than the federal guidance.</p> <p>States may increase their micro-purchase thresholds to \$50,000 in certain situations.<sup>7</sup></p> <p>State agencies may approve exemptions for competitive methods and allow for non-competitive procurements.</p>
<b>Why States Might Want to Vary</b>	<p>Some rule makers perceive that to mitigate risk and increase oversight, purchasing thresholds must be kept low, which may explain why some states are not comfortable increasing their thresholds to match federal levels.</p> <p>However, by doing so, states are also giving away flexibility allowed by federal regulation in purchasing and increasing the time and resources needed to make certain purchases.</p>

## 2. Operating procurement processes that are competitive and fair

<b>Federal Regulations</b>	<p>Bids and proposals (RFPs) must be publicly advertised, publicly opened, and objectively evaluated.</p> <p>SFAs must set written procedures for proposal evaluation.</p> <p>Quotes must be publicly solicited from an “adequate number of qualified sources.”</p> <p>IFB awards must be made to the “lowest responsive and responsible bidder.”</p>
<b>State Regulations</b>	<p>States can layer on requirements or write procedures around (1) how to advertise and communicate bid opportunities and RFPs, (2) how to design evaluation procedures and criteria, (3) defining timelines and rules for submission, and (4) defining “adequate number” of quotes and bids necessary to award a contract.</p>
<b>Why States Might Want to Vary</b>	<p>States design processes with an understanding of regional supplier ecosystems.</p> <p>Lowering the barrier for entry may lead to more bids, but it could also slow down the evaluation and award of contracts.</p> <p>Longer timelines to process solicitations and evaluate them can significantly harm vendor trust and satisfaction with government.</p>

## 3. Maintaining appropriate documentation for all procurements

<b>Federal Regulations</b>	<p>Requirement that SFAs maintain records on process, bids, and awards.</p>
<b>State Regulations</b>	<p>States can require additional record-keeping.</p>
<b>Why States Might Want to Vary</b>	<p>States may promote additional documentation collection with the goal of mitigating risk. However, additional documentation could tax SFAs who already face capacity challenges.</p>

#### 4. Aligning with the Buy American policy for school food programs

<b>Federal Regulations</b>	Strict requirements to buy American commodities and products as often as possible.
<b>State Regulations</b>	States have generally remained aligned to federal Buy American guidelines.
<b>Why States Might Want to Vary</b>	There is little variation on this topic, but some states may additionally preference local food purchasing (see below).

#### 5. Encouraging contract participation from businesses that are small, minority-owned, women-owned, or veteran-owned

<b>Federal Regulations</b>	<p>The CFR makes recommendations for increasing contract participation from these business types but does not set rules.</p> <p>SFAs are encouraged to increase contracts with listed groups.</p>
<b>State Regulations</b>	States may choose to more prominently present and communicate the guidance, in some cases including it in their state procurement code.
<b>Why States Might Want to Vary</b>	If states wish to increase bid participation from small, minority-owned, women-owned, and veteran-owned businesses, they will develop more prominent communication on these topics, for use by both SFA purchasers and Food Service Management Companies (FSMCs).

#### 6. Increasing local food purchases by incorporating geographic preference

<b>Federal Regulations</b>	<p>Federal code allows states to preference and define 'local' purchasing.</p> <p>Local preferencing is not required, but now no longer prohibited as of April 2024.</p>
<b>State Regulations</b>	<p>States and SFAs define 'local' and can choose how much weight to give to geographic preference.</p> <p>States can align purchasing with local initiatives or community strategies.</p>
<b>Why States Might Want to Vary</b>	States may want to leverage school meals to support the local economy of suppliers and producers, and to increase the opportunity to provide fresh and healthier food options to schools. However, using local suppliers may come at an increased cost.



## IV. Findings: Differing State Procurement Regulations and Interpretation

This section explores how states align or deviate from the federal code when it comes to school food procurement. In our sample of 21 states, around six states more closely mirror the federal regulations, which in some cases it means literally referencing USDA websites and memos verbatim or through hyperlinks, while about five other states promote distinct, sometimes innovative, approaches to school food purchasing, training, and administration.

### A. School Food Procurement Methods and Thresholds

As SFAs begin the process of procuring food for the upcoming school year, they need to be familiar with federal regulations, as well as their own state purchasing code, which, as mentioned, might vary from the federal guidelines.

States will typically provide information about these regulations on their websites.

Our research showed that most state agency websites provide sufficient information on federal regulations when they pertain to federal child nutrition programs, such as the National School Lunch program (NSLP) and the School Breakfast program (SBP). Many state child nutrition home pages have direct links to the two most relevant sections of the Code of Federal Regulations — [CFR Title 7](#) and [CFR Title 2](#) — making it clear to school staff which requirements to follow for this specific program.

A key finding in our review of state websites is that all sampled states included information about the three procurement methods (informal, formal, and non-competitive procurement) defined in CFR Title 2 Part [200.320](#) in their purchasing code and regulations. However, many states have additional rules and recommendations guiding the usage of each method.

### B. Guidance States Provide Around Informal Procurement

The maximum dollar amount allowed for informal procurements varies greatly among the 21 states, from \$10,000 (Rhode Island) to \$250,000 (Missouri, Oklahoma), averaging \$93,000 in sampled states. This means that in Rhode Island, any purchase over \$10,000 needs to go through a formal procurement method, while for Missouri and Oklahoma, a formal procurement method is required only for a purchase of over \$250,000. In fact, 17 out of the 21 states in our sample set a lower maximum dollar amount for informal procurement than the federal level (See [Appendix 3](#)).

Within the category of informal procurement, many states provided additional detail on their websites around two specific methods: micro-purchasing and small purchasing.



### *Micro-purchasing*

States varied in their interpretations of the proper use of micro-purchasing as a procurement method, like whether it should be used in emergency-only situations or for any stand-alone purchase below the dollar threshold limit. For example, Kansas<sup>8</sup> highlights this method as an option for emergency purchases but notes when the method can be used in other situations, while Texas<sup>9</sup> advises that micro-purchasing should be infrequently used only when facing specific limitations.

On some state websites, micro-purchasing was mentioned as a tool to encourage local fresh food purchasing or expand vendor pools. Delaware<sup>10</sup> and Michigan<sup>11</sup> both encourage their districts to use micro-purchasing to its full extent, and use that opportunity to purchase from local, women, and minority-owned producers. Other states do not include this method as an option on any resource materials, training, or web content (e.g., Alaska).

Over half of the states sampled mirror the federal micro-purchasing threshold of \$10,000, but not all highlight the 2021 federal regulation update that allows state agencies and program operators to self-certify and increase their micro-purchase threshold up to \$50,000 or over \$50,000 in some situations.<sup>12</sup> The states that display this update front and center include Illinois, Tennessee, Indiana, and New York.

Meanwhile, West Virginia and South Dakota have micro-purchasing thresholds less than \$10,000 (\$5,000 and \$4,000 respectively), significantly limiting a district's ability to purchase many categories of items without a competitive process.

### *Small purchasing*

Less overall guidance from states was provided around the category of small purchasing, and most guidance was around how many quotes to collect and the method for quote collection. Most states asked for two or three quotes, collected either verbally or written. Some states' quote collection process depends on sub-thresholds within small purchasing. For example, West Virginia has a small purchasing threshold of \$5,000 – \$25,000, but for purchases under \$10,000 only three verbal quotes are required. Meanwhile, for purchases between \$10,000 – \$25,000, the three quotes must be in written format.<sup>13</sup> A state can also require that quotes be bound by geography. For example, Alaska encourages districts to purchase from Alaska suppliers and producers, so their procurement code first requires SFAs solicit quotes from at least three Alaska vendors, before contacting out-of-state vendors.<sup>14</sup>

## **C. Guidance States Provide Around Formal Procurement**

For purchases over a specific dollar threshold, SFAs must follow a formal, competitive procurement process, usually a Request for Proposals or an Invitation to Bid. Some states present that formal procurement methods are an option at any dollar amount but mention that they are required after a certain threshold.

For example, Nevada's purchasing guide for vendors states that "[p]urchases under \$25,000 may be obtained by telephone quotes, written quotations, or the sealed bid process may be used. Purchases over \$25,000 require the sealed, formal bid or proposal process."<sup>15</sup> Similarly,

Illinois guidelines state that “a School Food Authority/Sponsoring Organization could choose to use the formal procurement method rather than the informal procurement method” for their small purchases.<sup>16</sup>

Within the category of formal procurement, many states provided additional detail on their websites around two types of formal procurement methods: invitations for bids and requests for proposals:

### *Invitations For Bids*

This is the formal purchasing method most frequently mentioned by states in this report. The process varies widely across states, especially in the submission process and how the solicitation is advertised. Most guidelines are written into state code (rather than in public guidance), but it is obvious that they were written decades ago, since almost all reference the advertisement of bids via local newspapers.

Some states have updated this language to allow online notices in the school district’s website or other public online forums. Still, there is variation in the number of “notices of opportunity” required, the length of time of advertisement (anywhere from 7-45 days), and the expected minimum number of bids to receive. Some states still require in-person submission of paper bids, while others have fully moved to an online portal. Some states keep both options open for submissions. Lastly, the regulations around bid openings are very strict, and in most cases written in the purchasing code, with the majority happening in person on a specific day and time. In some cases, the award timeline is specified, such as in South Dakota,<sup>17</sup> which, for Invitation for Bids covering supplies, requires a maximum 45-day window between bid opening and bid award.

### *Requests For Proposals*

These allow for the consideration of factors beyond price when selecting a vendor. Only 12 states mention RFPs as a food purchasing method on their websites, often presented alongside the option for Invitation for Bids (IFBs, also known as “Invitation to Bid” or ITBs). The remaining states do not mention Requests for Proposals on their websites, or explicitly discourage their use as a purchasing option for food: Florida recommends “food solicitations are best suited as an ITB.”<sup>18</sup> Meanwhile, Michigan includes information about RFPs (including what information should be included in an RFP) but limits their use by stating that they are best for “big-ticket, complex projects such as food service management companies, vended meals, and full kitchen remodels.”<sup>19</sup>

Furthermore, many states prescribed how and when methods other than lowest bid (i.e., RFPs) should be used. For example, in Illinois, state code exempts public schools from using the lowest price responsible bidder, in “contracts for goods, services, or management in the operation of





a school's food services ... if a good faith effort is made on behalf of the school district to give preference to contracts preferencing state priorities including student health and well-being, local and regional suppliers, USDA recommended pest management practices, animal welfare, and opportunities for businesses owned and operated by minorities, women, or persons with disabilities.”<sup>20</sup>

We found that very few states recommend one procurement method over the other, but that most outline the pros and cons of each formal method and when to use. For example, Alaska's Formal Procurement Matrix (See **Appendix 4**).

Although many states and SFAs have committed to “good food purchasing” standards,<sup>21</sup> their reliance on lowest-cost bidding for most purchases (over more flexible RFPs) can be at odds with achieving these standards, which may come at higher cost. We did not find website language encouraging RFP use to achieve goals related to health and nutrition, local economies, worker livelihoods, and environmental impact. Without a mechanism to move beyond low-cost bidding, states are unlikely to achieve these value-based policy goals.

Most states agree on requiring RFPs for FSMC contracts, given their high dollar price tag and the need to assess vendors based on past performance, experience, and approach (non-price factors). Missouri, Tennessee, Indiana, Delaware, and Michigan prescribe or strongly recommend using an RFP for FSMC contracts, and even provide separate guidance, templates, and training specific to soliciting FSMCs. Most of these states also provide SFAs with a list of preferred/vetted FSMCs to share their RFP.





## D. Guidance States Provide Around Non-Competitive Procurement and Other Purchasing Techniques

Most states mirror the federal guidelines for non-competitive procurement and there were no significant variances found across the states.

In addition to the three general categories of procurement methods (informal, formal, and non-competitive), some states identified additional methods of purchasing:

### *Limited/Restricted Competition*

In some state purchasing codes or manuals, we found discussion of creating smaller, pre-qualified pools of vendors that can compete for a contract in state procurement guidance. This method is related to pre-qualification approaches or utilizing Requests for Qualifications (RFQs) to create a pool of vendors and then issuing mini-bids or task orders to that pool or bench of vendors, which is common practice in other areas of procurement (e.g., commodities, goods, non-professional services).

- For example, Alaska's Procurement Manual mentions that a limited competition alternate procurement may be pursued if it is in the best interest of the state to make a purchase from among a restricted pool of vendors rather than all vendors, and there is supporting written evidence. Additionally, limited competition alternate procurements are appropriate when a clear number of capable vendors are available and a time constraint exists.<sup>22</sup>
- An important caveat to this finding is that there does not seem to be evidence of any states recommending RFQs or related approaches for purchases related to school food service. Furthermore, we could find only one instance online of an RFQ being used for a purchase related to school meals.

### *Innovative Methods*

Some states allow for more innovative purchasing methods in their state procurement codes. For example, in Texas's Education Code, the State lists several options for competitive procurement including reverse auctions.<sup>23</sup> These allow a government to procure goods and services from suppliers in a competitive environment in which sellers anonymously submit decreasing bids until the auction is complete. Meanwhile, Alaska's State Procurement Manual creates flexibility for alternative procurement methods not named in code.<sup>24</sup> However, it is not clear whether either of these policies apply to school food specifically, or whether school districts receive any communication about the applicability of these methods for district-level purchasing.

### *Group Purchasing*

When states had information related to the use of cooperatives or group purchasing organizations, the information was most often pulled directly from [USDA memos](#) on the subject. It often did not include language that could guide or influence an SFA to choose these over more conventional purchasing approaches. A handful of states produced their own guidance on this topic. For example, Arkansas provides a list of pros and cons to co-ops and GPOs (though buried in page 254 of a 268-page training book);<sup>25</sup> Oklahoma provides a similar list of pros and cons, with additional guidance on steps to take when forming a buying group.<sup>26</sup> Rhode Island created a comparison chart<sup>27</sup> on contracting with other SFAs versus contracting with FSMCs, but does not clearly share the benefits and costs of each method.

## E. Guidance States Provide Around Recommending a Single Purchasing Method

A key research question for this report was, “do states tend to recommend certain procurement methods?” We found that most state agency websites stop short of recommending or prescribing a single purchasing method. Instead, state agencies emphasize strict adherence to purchasing thresholds; some states decline to describe state thresholds in their training materials and simply recommend that website users check with local agencies for the most accurate information.

Only four states in our sample mirror the federal purchasing thresholds:

	<b>Federal</b>	<b>Southwest Region</b>	<b>Mountain Plains Region</b>	<b>Mountain Plains Region</b>	<b>Northeast Region</b>
		<b>OK</b>	<b>KS</b>	<b>MO</b>	<b>VT*</b>
Micro	< \$10,000	\$10,000	\$10,000	\$10,000	<\$40,000
Small	\$10,000 – \$250,000	\$10,000 - \$250,000	\$10,000 - \$250,000	\$10,000 - \$250,000	\$40,000 - \$250,000
Formal	>\$250,000	> \$250,000	> \$250,000	> \$250,000	> \$250,000

In the table above, Vermont stands out by having a higher micro-purchase threshold than the federal code. However, in this case, the more restrictive federal threshold applies, meaning that the micro-purchasing option would still only be available for food purchases under \$10,000. However, all other state purchases not subject to federal rules would follow the state threshold of \$40,000. Vermont is also unique in that their formal purchasing threshold of \$250,000 only applies to food purchases made from the non-profit school food service account. All other purchases are subject to the lower \$40,000 threshold (e.g., construction, repair, supply items).<sup>28</sup> There are also geographic exceptions to state thresholds, like the case of Washington, where state thresholds are waived, and higher thresholds are applied for food grown in-state.<sup>29</sup>

In Tennessee, thresholds are dependent on the population of the county where a school sits, or whether the school is public or non-public.<sup>30</sup> See table below:

<b>State Term</b> ( <i>Federal Term</i> )	<b>Federal</b>	<b>Tennessee (Southeast Region)</b>
<b>Formal Purchase</b> ( <i>Sealed Bids or Proposals</i> )	> \$250,000	> \$25,000
<b>Small Purchase</b> ( <i>Small Purchase</i> )	\$10,000 - \$250,000	< \$10,000 (public school systems w/o central procurement) \$10,000 - \$25,000 (public school systems with central procurement) \$10,000 - \$250,000 (non-public school systems) *A public school in a county with population of 40,000+ may increase threshold to \$25,000
<b>Micro-Purchase</b> ( <i>Micro-Purchase</i> )	< \$10,000	< \$10,000

Others, like West Virginia, create tiers within the threshold category, with each tier having a different set of requirements for how quotes are collected.<sup>31</sup> See table below:

<b>State Term</b> ( <i>Federal Term</i> )	Federal	West Virginia (Mid-Atlantic Region)
<b>Formal Purchase</b> ( <i>Sealed Bids or Proposals</i> )	> \$250,000	> \$25,000
<b>Small Purchase</b> ( <i>Small Purchase</i> )	\$10,000 - \$250,000	\$5,000 - \$25,000 3 verbal quotes for \$5,000 - \$10,000 3 written quotes for \$10,000 - \$25,000
<b>Micro-Purchase</b> ( <i>Micro-Purchase</i> )	< \$10,000	< \$5,000

Furthermore, states also create exemptions to state purchasing thresholds based on the types of food items being purchased. For example, South Dakota and Illinois have different thresholds for perishable and non-perishable food (and in the case of Illinois, perishable beverages are named as well).<sup>32,33</sup> In New York state, SFAs may use informal purchase methods to separately purchase certain non-processed food categories that are grown, produced, or harvested in New York state, up to a maximum per order amount of \$150,000. New York has an exemption allowing increased use of informal purchase thresholds to purchase fluid milk produced in New York state up to a formula-defined dollar amount.<sup>34</sup>

The only place we saw a state make a recommendation for LEAs to adjust their thresholds to mirror the state's threshold was in New York: "School districts may consider amending current policies that are more restrictive in order to accommodate the use of these flexibilities."<sup>35</sup> As part of statutory changes, New York provides a formal bidding [exemptions toolkit](#) to guide SFAs in threshold interpretation. Yet, after all those differences, state thresholds are a baseline for SFAs or school districts to set stricter thresholds. Many resources encouraged users to consult their local/SFA thresholds rather than simply following state thresholds.

## F. Guidance States Provide Around Targeting Small and Minority Businesses and Women's Business Enterprises

Nearly all states we sampled mention the federal guidance to increase contract participation from small businesses, minority-owned businesses, women-owned businesses, veteran-owned businesses, and labor surplus area firms. However, some states had little more than one-sentence statement about federal efforts, while others copied federal guidance verbatim and displayed it in full on their child nutrition home pages. For example, Alaska shares a full statement,<sup>36</sup> and Illinois mirrors the federal language on contracting with small and minority-owned businesses in their state code, which is referenced as a required component of all RFPs.<sup>37</sup> In other cases, we saw text related to the federal guidance on this matter included in solicitation templates or training documents. In a changing landscape, states likely prefer to reference final federal guidance in this area to maintain compliance.

### *Excerpt Language from [State of Alaska Website](#)*

"All sponsors are encouraged to take affirmative steps to ensure that minority firms and women's business enterprises are used when possible. Affirmative steps may include placing such business on solicitation lists and ensuring such businesses are solicited whenever they are deemed potential sources..."





## V. Findings: State School Food Procurement Training and Information

### A. School Food Procurement Resource Access

While states share similar information related to school food purchasing on their websites, the ease of navigating those agency websites varies greatly. For example, visitors to the [Rhode Island child nutrition website](#) are greeted by a cheery blue banner that invites them to click down for training, or download a how-to-guide for working with local farmers. The website offers pre-recorded videos and policy templates available without needing to log in, making it easier for visitors to find what they need.

As part of our research, we also reviewed how clearly key information was presented on state web pages, as that could have a major impact in SFAs' ability to easily process and digest information. **Appendix 5** shares screenshots and links to a sample of state websites.

#### Website features that create barriers for SFAs:

- Conflicting information
- Broken links
- Too many links
- Information is buried in a cluttered website page or in a training video
- Outdated information
- Short descriptions that don't provide enough information

#### Website features that support SFAs:

- Simple headings
- Working links
- Pleasant color palettes
- Child nutrition pages with a dedicated procurement section
- Up-to-date information
- Information shared in various ways: how-to guides, toolkits, templates, forms, manuals, and handbooks
- Easy-to-read fonts

We recommend state websites include the following resources to better support SFAs:

- **Regulations and policies**, both state and federal, including standards of conduct, Buy American rules, and rules around geographic preference.
- **Tools and templates**, including procurement checklists, procurement plan and procedures templates, procurement calendar templates, procurement timelines, templates for informal quotes, IFBs, and RFPs; director's toolkits or manuals for School Nutrition Programs, and required contract language and sample FSMC/vended meals contracts.
- **Helpful guidance**, including information about frequently asked questions, procurement methods and thresholds, contract types, Farm to School and how to procure local foods, vendors and FSMCs that could be fits, cost price analysis, and group purchasing organizations and cooperative purchasing.

Additionally, we identified the following standout resources related to school food procurement:

- **Michigan's Farm to School site:** Though linked within the State's Child Nutrition Local Purchasing page, this site is run by Michigan State University as part of the National Farm to School Network. The site provides resources specific to support a range of efforts to serve local foods in schools, including local food purchasing incentives, school garden programs, and fundraisers using local agricultural products among many others.
- **Delaware's Procurement Manual:** This is the primary resource for CNP administrators to conduct procurement in a manner that is consistent with federal and state regulations. It clearly states the federal regulations/thresholds and what State of Delaware CNP operators must follow (which is slightly different). It also includes a table with all the required contract provisions for federal awards and appendices with a sample informal quote log and sample bid solicitation.
- **New York's required clauses for contracts:** This one slide visual is a simplified version of New York's contract provisions table, and includes threshold amounts for when each is necessary, along with links to the exact language for easy copy and paste into contracts.
- **North Carolina's Procurement Decision Tree:** This resource alone provides clear guidelines for which steps to take depending on the type of purchase an SFA needs to make. It also includes a companion slide for purchases that are unique and may fall outside the customary informal/formal parameters.



## B. Guidance States Provide Around School Food Procurement Trainings

To properly discuss procurement training, we divided this section into training sources, topics, and formats.

### *Sources*

For school food procurement training, states generally reference three main sources of content: USDA, The Institute for Child Nutrition (ICN), and state-produced materials (which are sometimes produced in collaboration with an institution of higher education).

Many states reference both USDA and ICN virtual trainings, including links directing users to webinar registration pages or the host website where they can search for a specific training by name or date. Another group of states produced their own training materials, which ranged from member-only sessions to widely accessible videos posted to YouTube, to PDF documents and power point presentations available for download. In one case, Vermont referenced a [suite of training materials](#) from Wisconsin as best practice.

Only a few states, including [Oklahoma](#) and [Indiana](#), provided no training links on their public websites or had a disclaimer pointing users to contact the state child nutrition team (or another specific point of contact) to request a la carte training/technical assistance. A unique example was [Alaska](#), which did not offer any training on their website but indicated “we will notify individuals of training they’re required to take.” Please see **Appendix 6** for a full list of trainings identified through this research.

### *Topics*

Around 12 states offer little to no training on procurement best practices, only offering an annual training program for school food directors, administrators, and others that manage school food programs, which barely covers procurement as a topic.

Best practice training in procurement might include topics such as market research, solicitation writing, managing procurement processes, evaluating bids or proposals, and effective contract administration/management strategies.

States do, however, offer many training videos and materials on other school-food related topics like meal patterns, community eligibility provisions, Buy American, USDA foods, ethics, Farm to School among others. There were also instances where states devoted all training offerings to one topic, such as FSMC contracting and management (Rhode Island, Tennessee, Indiana, Pennsylvania). There were even fewer states (an exemption was Illinois) that offered any specific training on cooperative purchasing groups or group purchasing organizations (GPOs).

Looking beyond school food procurement specific resources, general state procurement or purchasing web pages also offer their suite of trainings and resources. However, these resources are geared toward general procurement and state contracting, with no content specifically tailored to the needs of school food programs. If these general state-level procurement resources were to be consulted by SFAs, we would imagine they might create additional confusion around which general state-level purchasing policies and rules apply.



## *Format*

As mentioned earlier, the format of choice for school food procurement training tends to be webinars and virtual sessions, though some states do offer in-person training options where the instructor comes to a school or district facility. For example, in New York, school nutrition program staff can attend a [week-long workshop](#) in a location within the state and participate in classes, activities, and professional development sessions.

Almost all virtual training we came across in our research was offered free of charge and available to all, and some in-person training was also offered free of charge in some states. However, a limitation of our research is that we were unable to review intranet and internal sites, in which there may be additional fee-based training.

Across websites we scanned, the length of training sessions geared to SFAs also varied for both virtual and in-person formats; some webinars were over two hours, while others were as short as 15 minutes. In-person offerings ranged from a couple of hours to week-long conferences/workshops. Most trainings identified noted number of certification and recertification hours and are accessible on-demand.

Other noteworthy training topics include anti-meal shaming, civil rights compliance, writing specifications, financial management, procurement reviews, finding and buying local foods, and geographic preferences.



## VI. Findings: Challenges Impacting the Vendor Pool

SFAs want to engage with a broad pool of suppliers, producers, and processors to get the best price, reliability, and quality. However, SFAs frequently do not see as many vendors bid as they would hope.

During its inaugural meeting in February 2024, the USFA's [Advisory Procurement Work Group](#) identified several reasons why vendors may not bid:

- Many vendors also work with private sector entities, which generally have easier procurement processes and do not follow federal thresholds.
- Vendors may not have time or energy to navigate a paper-based processes still used by some SFAs.
- Prospective bidders may not hear about an opportunity to bid on a SFA contract until the open period for accepting bids is nearly closed.

Over the past few years, the GPL has conducted interviews with local school districts across the U.S. and with nonprofit advocacy, research, and purchasing organizations involved in school food program procurement. (See **Appendix 7** for a list of agencies and organizations.) Our research has confirmed many of the initial findings put forth by the USFA's Advisory Procurement Work Group around key challenges that may prevent districts and SFAs from engaging with a broader pool of suppliers, producers, and processors.

### *Common themes that came up in our research include:*

- *Limited Distribution Capacity:* SFAs may require frequent deliveries due to limited or no warehouse space, and many small- or medium-sized vendors do not have the trucking and logistics capacity to deliver in this way.
- *Compliance Burden:* In some instances, the inclusion of complying with all requirements in an RFP disqualifies vendors or places too high of a reporting and compliance burden on them, resulting in fewer or no bids.
- *Bid Complexity and Administrative Burden:* Prospective vendors have difficulty navigating complex bids with short application windows. SFAs have difficulty crafting IFBs or RFPs that are easy to navigate, clearly describe their need, and provide concise but sufficient information.
- *Price and Availability Volatility:* Natural disasters, changes in weather, and food price inflation result in high volatility in prices and availability in the agricultural market.
- *Dominance of Large, Bundled Contracts:* When SFAs can contract with a single broadline distributor for all the items they need, there is little incentive to unbundle products and work with multiple smaller vendors who offer less product variety.
- *Bid Timeline Too Early:* SFAs often plan menus far in advance and forecast their food needs, causing them to release procurements many months in advance of needing a product. It can be difficult for some vendors to predict their products and prices this far in advance.
- *Limited Vendor Connections and Outreach:* SFAs often have limited relationships with the types of vendors they are hoping will apply for their bids, and proactive outreach to

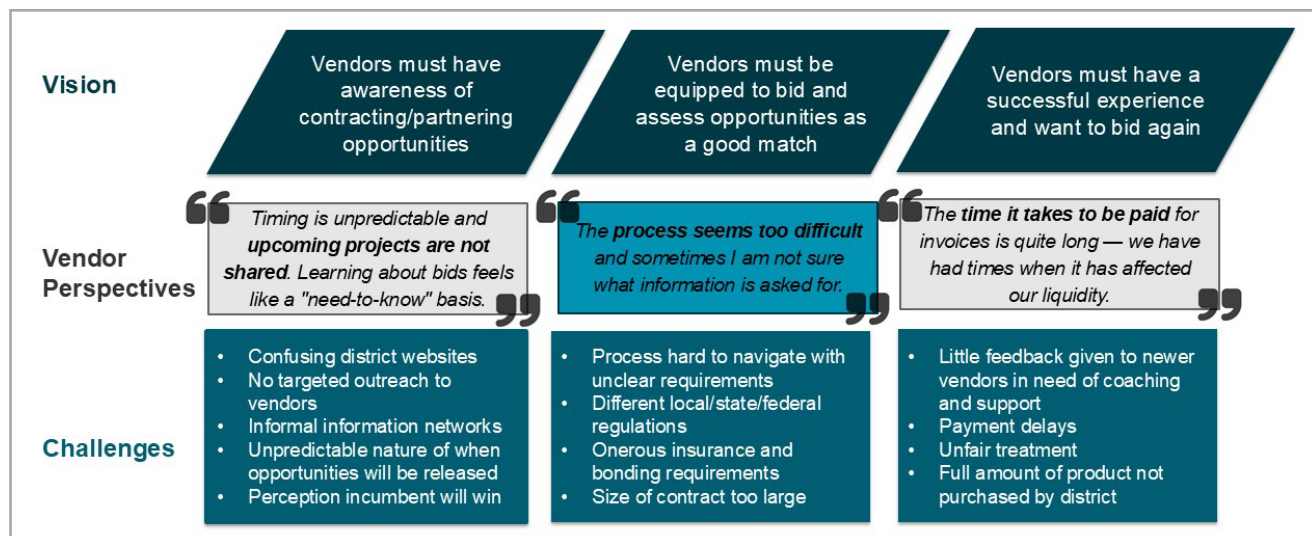


vendors can be constrained by time, capacity of SFA staff, or budgets. One reason for this may be cultural differences and legacies of mistrust between suppliers and agencies. For example, governments may be worried about breaking procurement law by engaging directly with vendors, and a local vendor may be suspicious of government contracts based on a previous experience. This limits agencies' understanding of what vendors can offer, in what quantities, and when, resulting in menu-planning processes that are disconnected from local offerings.

- *Lowest Bidder Requirements:* When SFAs are legally bound by lowest bidder requirements absent any additional pricing incentives for certain values (e.g. 10% preference for local or minority-owned business), it is difficult to award contracts to values-aligned vendors or make decisions based on past performance of vendors.
- *Vendor Payment Delays:* Delayed SFA payments can disproportionately harm smaller vendors reliant on steady contracts for cash flow.
- *Insufficient Lead Time and Volume Uncertainty:* SFAs may fall behind in giving proper lead time for orders and/or come in at a lower volume than producers expected, creating financial uncertainty for smaller vendors.



The below graphic shows how an SFA might recognize and predict which of the above barriers might be posing the largest burden to prospective vendors:



There are numerous possible solutions that SFAs can enact to address barriers that prospective vendors face, especially local, small, and diverse businesses. These tactical procurement changes include:

- **Improving outreach to targeted vendors and providing more advance notice of opportunities.** Provide forecasts of upcoming opportunities on the district website with clear timelines, budget estimates, and a summary of anticipated needs. Publicize opportunities via state and local associations and nonprofit organizations.
- **Helping to equip targeted businesses with the information they need to successfully bid on opportunities.** Streamline vendor registration requirements as much as possible. Revisit solicitations to clarify scope, budget, and timeline specifications. Unbundle contracts and scope each solicitation with small businesses in mind. Receive feedback on prior solicitations from unsuccessful vendors to understand barriers they faced.
- **Building positive, fair working relationships with awarded vendors.** Streamline internal district contracting, invoice review and payment processes to minimize payment delays. Maintain a quick and consistent system for providing feedback for contractors and receiving feedback, such as via surveys or status reports. Hold vendor connection events to help connect experienced prime vendors with potential subcontractors.

In our scan of state websites, we were surprised to find that there was very little mention of how SFAs might adjust procurement processes and practices (especially in ways that do not require legislative change) to address some of the core barriers that vendors face. Wider sharing of approaches to create larger vendor pools, but customized to SFAs, could be a promising resource or training to develop.

## VII. Closing

Helping children across the United States access nutritious meals each day is one of the most critical roles of government. How that meal ends up at a child's lunch table depends upon SFAs' successful procurement of the food components of that meal, but also the purchase of the paper products that meal will be served on, the contracting with the repair firm who must fix a broken refrigerator, and even the last-minute coordination with a local farm to buy apples if a major delivery is delayed.

Our research recognizes that SFAs must navigate a complex and changing environment of regulations as they make purchases and sign contracts. Across our three categories of rules, information & training, and vendor pool size, the challenges include:

### *Rules*

- The complexity of federal rules governing federally funded school food purchasing create navigation barriers for SFAs. While many of these rules aim to achieve important goals, such as buying American-grown food, food safety, anti-corruption and fairness in contracting, there often are not sufficient training, tools or resources on how to navigate regulation on state websites.
- State rules governing school food procurement vary across states, and in many cases, are more restrictive than federal rules. (And, though out of the scope of our research, it is critical to note that local and SFA-level rules may at times be even more restrictive than state rules.)
- Critically, state rules and procedures did not vary across all dimensions. For example, many states had different procedures for how to collect three quotes in informal purchasing or at what threshold a micro-purchase could take place, but we saw little variation in how states talked about Buy American requirements or divergence in mentioning the federal guidance to increase contract participation from small businesses, minority-owned businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms.

### *Information and Training*

- States vary in guidance they provide on their websites related to school food purchasing. In some cases, the information was far more comprehensive. Very rarely were states recommending the use of certain procurement methods in specific circumstances or providing SFAs with guidance on how they might attract a larger pool of bidders by increasing the accessibility of procurement practices.
- The availability of training on state websites also varied widely. However, we observed general trends, including many states referencing USDA and ICN trainings, and similarity in training topics, including meal patterns, community eligibility provisions, Buy American, USDA foods, ethics, Farm to School among others. There was very little training referenced that promoted capacity building around procurement or taught procurement best practices.

### *Vendor Pool*

- When state procurement rules are poorly communicated or contradictory, SFAs may face additional shortages in their vendor pool, as suppliers struggle to navigate many layers of regulation. When bid advertisements or methods of response are not modernized to digital standards, SFAs may find it challenging to keep vendors informed of contracting opportunities.



**From this research, state agencies overseeing child nutrition programs might consider where there are opportunities to:**

1. Improve their websites to include clearer and more consistent information for SFAs, especially improving the ease of access to key information about procurement dollar thresholds, and producing content specifically tailored to prospective vendors to help them understand regulations.
2. Work with their state legislators to provide information about where their procurement thresholds are out of step in comparison to peer states, or whether aspects of procurement procedures (e.g., submission by fax or posting in newspaper) could be modernized in comparison to other states.
3. Explore how they might take steps to reduce burdens the vendor community faces in terms of finding bids, such as by having state websites host or co-promote solicitations issued by SFAs.
4. Identify whether additional resources and guidance could be provided to SFAs, noting that some of the most advanced states provide numerous template documents to SFAs to reduce duplication of effort, and
5. Place additional highly reviewed training resources on websites and add additional training on procurement best practices to websites as well.

Our research had limitations that are important to note. First, only public-facing state websites were reviewed. It could be the case that some states have robust intranets or internal documents that contain additional guidance and training on various aspects of school food procurement. Other states, such as Tennessee, employ technical consultants to provide this information directly to SFAs in lieu of displaying on their website.

Second, in some cases, we found inconsistent information about threshold dollar amounts on state websites. We made an educated guess of the threshold amount by reviewing additional sources, including state procurement manuals guiding general state purchases. However, the possibility exists that we relied on incorrect or outdated information.

**Looking ahead, further research on this topic might include:**

- Additional research on purchasing thresholds across all U.S. states, beyond our sample of 21.
- User-research interviews with SFAs to understand how they commonly navigate state websites, their go-to sources for procurement answers, and to understand what non-public facing guides and websites they typically consult.
- Exploration of how frequently SFAs, school districts, or other local authorities are setting restrictions on school food purchasing practices more stringent than state or federal rules.

In summary, this research could support recommendations around future opportunities to reduce the administrative complexity of school food procurement, increase overall training, and can serve as a tool for comparison of practices and innovations across state and local food purchasing teams.

## Appendices

1. [List of States and Key Websites Reviewed](#)
2. [Purchasing Methods Overview](#)
3. [Threshold Comparison for All 21 States](#)
4. [Alaska Formal Procurement Matrix](#)
5. [State Website Screenshots](#)
6. [List of Trainings Identified](#)
7. [Entities/Organizations Interviewed in Prior Research](#)



## Appendix 1: List of States and Key Websites Reviewed

USDA FNS Region	State	Primary Websites Consulted
Mid-Atlantic Region	Delaware	Department of Education
Mid-Atlantic Region	Pennsylvania	Food & Nutrition
Mid-Atlantic Region	West Virginia	Child Nutrition
Midwest Region	Michigan	Department of Education
Midwest Region	Illinois	General Procurement for all Nutrition Programs
Midwest Region	Indiana	Indiana Department of Education - Nutrition
Mountain Plains Region	Kansas	State Department of Education
Mountain Plains Region	Missouri	Food and Nutrition Services
Mountain Plains Region	South Dakota	South Dakota Department Of Education Procurement Management
Northeast Region	New York	New York State Education Department
Northeast Region	Rhode Island	National School Lunch Program
Northeast Region	Vermont	State of Vermont Agency of Education
Southeast Region	Florida	Procurement Compliance
Southeast Region	North Carolina	North Carolina Department of Public Instruction
Southeast Region	Tennessee	School Nutrition Programs Resources
Southwest Region	Arkansas	(OLD) Child Nutrition Procurement (NEW) Child Nutrition Child Nutrition Unit Procurement Resources
Southwest Region	Oklahoma	Oklahoma State Department of Education
Southwest Region	Texas	Texas Department of Agriculture
Western Region	Alaska	Procurement for Child Nutrition Programs
Western Region	Nevada	National School Lunch Program Department of Administration Purchasing Division
Western Region	Washington	Child Nutrition

## Appendix 2: Purchasing Methods Overview

Information about procurement regulations in this section comes from the Code of Federal Regulations Title 2 Federal Financial Assistance Part 200.320 Procurement Methods. Read it here: [2 CFR 200.320](#)

**Micro-purchases** allow for purchases up to \$10,000 without seeking quotes, if the district considers the price reasonable based on “research, experience, purchase history or other information.”

- Before contacting suppliers, districts should determine a reasonable price for the product and document the research and logic for determining the reasonable price.
- As of 2021, updated regulations allow state agencies and program operators to self-certify an increased micro-purchase threshold up to \$50,000 or over \$50,000 in some situations, if regulatory requirements are followed.
- The CFR does not limit the number of micro-purchases for a single supplier but generally recommends distributing micro-purchases “equitably among qualified suppliers.”

**Small purchases** may be used for purchases higher than the micro-purchase threshold, but below or equal to the applicable lowest of federal, state, and local simplified acquisition threshold (SAT).

- Districts must obtain price or rate quotations from an “adequate number of qualified sources,” which the district can define based on state or local guidelines.
- Districts can obtain quotations directly from vendors in a variety of ways, including over the phone, via email, or face-to-face, and the final quotations must be documented.
- Unlike formal procurement, districts are not required to publicly advertise small purchases.

### Formal Procurement Methods for Larger and More Complex Purchases

Above the simplified acquisition threshold, sealed bids can be used to evaluate potential vendors based on price. This process is often called an Invitation to Bid (ITB) or Invitation for Bids (IFB).

- Districts must provide detailed specifications for products and services, but they cannot include a proprietary or restrictive specification (no brand names or manufacturers’ code). This can be mitigated by adding “or equal” to the specification.
- Bids must be publicly solicited from an “adequate number of qualified sources,” which the district can define based on state or local guidelines.
- Bids must be publicly advertised, publicly opened, and objectively evaluated.
- Award is made to the “lowest responsive and responsible bidder.” Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is the lowest.

- Awards are made in the form of a firm, fixed-price contract (lump sum or unit price). Negotiation of price or terms is not permitted.
- Depending on the scope of the purchase, districts can award contracts by line item (unit price), with awards to multiple suppliers based on the lowest price by item, or as a lump sum to a single vendor. The district must document justification for all bids received that were not accepted.

**Proposals** can be used to solicit more complex products or services that should be evaluated based on factors in addition to price (e.g., vendor experience, planned approach to service delivery). This type of solicitation is often called a Request for Proposals (RFP). The resulting contract can be either fixed price, with one or more payment points for specific tasks or deliverables, or cost-reimbursement, which requires the contractor to specify prices/rates for each type of good/service and invoice based on actual hours or units used.

- Districts must publicize the request for proposals, including identifying evaluation factors and relative weights.
- Districts must have written procedures for how to conduct proposal evaluations and select an offeror to award a contract.

**Noncompetitive procurement**, or sole source, can only be used if one of the following conditions applies:

1. “The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold (see paragraph (a)(1) of this section);
2. The procurement transaction can only be fulfilled by a single source;
3. The public exigency or emergency for the requirement will not permit a delay resulting from providing public notice of a competitive solicitation;
4. The recipient or subrecipient [district] requests in writing to use a noncompetitive procurement method, and the Federal agency or pass-through entity provides written approval; or
5. After soliciting several sources, competition is determined inadequate.”

## Appendix 3: Threshold Comparison for all 21 States

### Table Key

	Threshold information difficult to find, outdated, or conflicting information.
	Threshold information located but buried in a template or obscure guide.
	Threshold information located and referenced in official agency guidance or code.

State	Micro Purchase	Small Purchase	Formal Purchase	Notes
Delaware	Under \$10,000	\$10,000 - \$100,000	\$100,000 and over	
Pennsylvania	Under \$10,000	\$10,000 - \$23,200	\$23,200 and over	
West Virginia	Under \$5,000	\$5,000 - \$25,000	\$25,000 and over	With 3 verbal quotes for \$5,000-\$10,000 3 written quotes for \$10,000-\$25,000
Michigan	Under \$10,000	\$10,000 - \$100,000	\$100,000 and over	
Illinois	Under \$10,000	\$10,000 - \$35,000	\$35,000 and over	Threshold is \$250,000 for perishable food and beverages.
Indiana	Under \$10,000	\$10,000 - \$150,000	\$150,000 and over	
Kansas	Under \$10,000	\$10,000 - \$250,000	\$250,000 and over	
Missouri	Under \$10,000	\$10,000 - \$250,000	\$250,000 and over	
South Dakota	Under \$4,000	\$4,000 - \$50,000	\$50,000 and over	According to state code, purchases of perishable foods by schools are exempt from state thresholds.
New York	Under \$10,000	\$10,000 - \$20,000	\$20,000 and over	Exemptions for milk and items produced in NY state.
Rhode Island	Under \$10,000	\$10,000	\$10,000 and over	
Vermont	Under \$40,000	\$40,000 - \$250,000	\$250,000 and over	
Florida	Under \$10,000	\$10,000 - \$50,000	\$50,000 and over	
North Carolina	Under \$30,000	\$30,000 - \$90,000	\$90,000 and over	Based on procurement manual from 2009. Current numbers are difficult to find.



Tennessee	Under \$10,000	\$10,000 - \$25,000	\$25,000 and over	Non-public school systems can make small purchases up to \$250,000, public school systems without central procurement up to \$10,000. A public school in a county with a population of 40,000+ may increase their small purchase threshold to \$25,000.
Arkansas	Under \$10,000	\$10,000 - \$24,800	\$24,800 and over	
Oklahoma	Under \$10,000	\$10,000 - \$250,000	\$250,000 and over	
Texas	Under \$10,000	\$10,000 - \$50,000	\$50,000 and over	
Alaska	N/A	\$0 - \$100,000	\$100,000 and over	Alaska's website did not mention micro-purchases.
Nevada	N/A	\$0 - \$25,000	\$25,000 and over	This is for general procurement; no mention of micro-purchases.
Washington	Under \$40,000	\$40,000 - \$75,000	\$75,000 and over	Procurements between \$10,000-\$40,000 require at least two quotes, and procurements between \$40,000-\$75,000 require at least three quotes.

\*Please note that threshold amounts may not be up to date, based on publicly available information collected from state agencies.\*

## Appendix 4: Alaska Formal Procurement Matrix

Source: <https://oppm.doa.alaska.gov/media/1448/formalmatrix.pdf>

FORMAL PROCUREMENT MATRIX					
REQUEST FOR PROPOSALS (RFP) PROCESS					
SUPPLIES, SERVICES OR PROFESSIONAL SERVICES					
PRICE OF PROCUREMENT	MINIMUM COMPETITION REQUIRED	FORMS USED BY AGENCY	PUBLIC NOTICE REQUIREMENT	AWARD METHOD	KEEP IN PROCUREMENT FILE
<p><b>Greater Than \$100,000</b></p> <p>AS 36.30.200</p> <p>The TOTAL procurement value must include all options to renew or extend. For example:</p> <ul style="list-style-type: none"> <li>If contract runs for 1 year with 2 one-year renewal options, use the total value for all 3 years.</li> </ul> <p>Purchase Requisition (form #02-099) must be sent to the Division of Enterprise Technology Services for telephone systems, radios, and other telecommunications equipment (see agency delegation of authority).</p> <p>Agencies are to submit requirements for construction, State Equipment Fleet vehicles, mobile homes, portable shelter units and prefabricated and/or sectional office, housing or shelter units directly to the Department of Transportation and Public Facilities.</p> <p>Agencies may not procure leased office space without a specific delegation of authority from the Division of General Services (DGS).</p>	<p>Issue formal Request for Proposals (RFP) in accordance with AS 36.30.130 and 2 AAC 12.130.</p> <p>The Competitive Sealed Proposals (CSP) process may be used for non-professional service contracts if the procurement officer determines in writing, with particularity, that the use of a CSP is more advantageous to the state than an ITB AS 36.30.200(b).</p> <p>No determination is required to use a CSP for professional service contracts.</p> <p>Service contracts above \$25,000 must be performed in the United States unless a waiver has been approved by the Chief Procurement Officer in advance.</p>	<p>Agencies should use DGS's RFP shell (see DGS's internet home page for copies of the document). Request for Proposal must contain:</p> <ol style="list-style-type: none"> <li>date, time, place for delivery of proposals;</li> <li>specific description of service, supply or professional service;</li> <li>contract terms and conditions;</li> <li>sufficient information for an offeror to submit proposal;</li> <li>evaluation criteria and its relative importance or weight; and</li> <li>price must be an evaluation criteria.</li> </ol> <p>If professional service, ensure contract meets definition per AAM 82.430.</p> <p>Clearly state all mandatory requirements.</p> <p>An ASPS form for Professional Services may be required by an agency's P&amp;P (if used, the number is assigned by the agency).</p> <p>A Standard Agreement Form (#02-093) and appropriate appendices for Professional Services that has been approved by AG's Office.</p> <p>Delivery order may be used for non Professional Services contracts.</p> <p>RAP form (#02-100) if applicable.</p>	<p>Circulate RFP for 21 days unless procurement officer determines in advance and in writing that a shorter notice period is advantageous and adequate competition is anticipated. Agencies should "time/date" stamp proposal envelopes immediately upon receipt.</p> <p>Advertise on the State of Alaska Online Public Notice system and when practicable, at least one of the following advertising methods may be used per AS 36.30.130 and 2 AAC 12.130:</p> <ul style="list-style-type: none"> <li>Publication in a newspaper of general or local circulation.</li> <li>Notices posted in public places where work will be performed or material/supplies furnished.</li> <li>Publication in other appropriate media, including electronic media.</li> </ul> <p>The Chief Procurement Officer must approve requests to provide out-of-state notice if it is impracticable to solicit only from Alaskan vendors.</p>	<p>Award is made to the proposal determined in writing to be the most advantageous to the state taking into consideration price and the evaluation factors in the RFP (AS 36.30.250).</p> <p>The evaluation committee is made up of a procurement officer, or at least three state employees or public officials (2 AAC 12.260).</p> <p>Only in-state residents can participate on the evaluation committee unless an exception is approved by the Commissioner of Administration (AAM 81.470).</p> <p>Include a 5% Alaska bidder preference, 5% Alaska veteran preference, 10% Alaskan offerors preference (if a numerical rating system is used), and all other statutory and regulatory preferences that apply.</p> <p>Only timber, lumber or manufactured lumber products originating in Alaska shall be used unless it is determined to be impracticable under AS 36.15.010.</p> <p>A valid Alaska business license is required at the time the contract is awarded (AS 36.30.210).</p> <p>You must issue a written Notice of Intent to Award (AS 36.30.365).</p> <p>A written determination required if awarding to a nonresident (AS 36.30.362).</p> <p>RFP's must weight price at 40% or higher for professional/non-professional services and 60% or higher for supplies, unless the Chief Procurement Officer approves a waiver.</p>	<p>Keep a copy of:</p> <ul style="list-style-type: none"> <li>ASPS (if required by Agency P&amp;P).</li> <li>RAP (if used).</li> <li>Original RFP.</li> <li>All proposals including late proposals.</li> <li>All RFP amendments.</li> <li>Register of Proposals prepared under AS 36.30.230</li> <li>Vendor list or advertising order.</li> <li>Required licenses, permits, insurance coverage, etc.</li> <li>Relevant RFP correspondence.</li> <li>Written determination of award prepared under AS 36.30.250.</li> <li>Contract document.</li> <li>Procurement summary report prepared under AS 36.30.510 - 520.</li> <li>All determinations required by statute, regulation, or the Alaska Administrative Manual.</li> <li>Notice of Intent to Award.</li> <li>Protest, if filed; procurement officer's decision, protest report, appellant comments, appeal, Commissioner's decision if applicable.</li> <li>List of PEC members.</li> <li>All scoring sheets and notes.</li> <li>Confidential items identified under AS 36.30.230(a).</li> </ul>

Note: Procurements for legal services must be approved in advance by the Attorney General's Office.  
RFPs for Architects, engineers, and land surveys follow different procedures.

# FORMAL PROCUREMENT MATRIX

## INVITATION TO BID (ITB) PROCESS

### SUPPLIES OR SERVICES

PRICE OF PROCUREMENT	MINIMUM COMPETITION REQUIRED	FORMS USED BY AGENCY	PUBLIC NOTICE REQUIREMENT	AWARD METHOD	KEEP IN PROCUREMENT FILE
<p><b>Greater Than \$100,000</b></p> <p>AS 36.30.100.</p> <p>The TOTAL procurement value must include all options to renew or extend. For example:</p> <ul style="list-style-type: none"> <li>If the contract will run for 1 year with 2 one-year renewal options, use the total value for all 3 years</li> </ul> <p>Purchase Requisition (form #02-099) must be sent to the Division of Enterprise Technology Services for telephone systems, radios, and other telecommunications equipment (see agency delegation of authority).</p> <p>Agencies are to submit requirements for construction, State Equipment Fleet vehicles, mobile homes, portable shelter units and prefabricated and/or sectional office, housing or shelter units directly to the Department of Transportation and Public Facilities.</p> <p>Agencies may not procure leased office space without a specific delegation of authority from the Division of General Services (DGS).</p>	<p>Issue a formal Invitation to Bid (ITB) in accordance with AS 36.30.130 and 2 AAC 12.130.</p> <p>Service contracts above \$25,000 must be performed in the United States unless a waiver has been approved by the Chief Procurement Officer in advance.</p>	<p>Agencies must use the Standard Terms and Conditions boilerplate, and High Tech boilerplate, if applicable (see DGS's internet home page for copies of the documents). The AG's Office must approve any changes to these documents.</p> <p>Agencies should use DGS's ITB shell (see DGS's internet home page).</p> <p>Delivery Order (form #02-601) may be used for contract document.</p>	<p>Circulate ITB for 21 days unless procurement officer determines in advance and in writing that a shorter notice period is advantageous and adequate competition is anticipated. Agencies should "time/date" stamp bid envelopes immediately upon receipt.</p> <p>Advertise on the State of Alaska Online Public Notice system and when practicable use at least one of the following methods per AS 36.30.130 and 2 AAC 12.130:</p> <ul style="list-style-type: none"> <li>Publication in a newspaper of general or local circulation.</li> <li>Notices posted in public places where work will be performed or material/supplies furnished.</li> <li>Publication in other appropriate media, including electronic media.</li> </ul> <p>The Chief Procurement Officer must approve requests to provide out-of-state notice if it is impracticable to solicit only from Alaskan vendors.</p>	<p>Award to the lowest responsive and responsible bidder per AS 36.30.170.</p> <p>Include in evaluation:</p> <ul style="list-style-type: none"> <li>5% Alaska bidder preference per AS 36.30.321(a).</li> <li>5% Alaska veteran preference per AS 36.30.321(f).</li> <li>3%, 5%, or 7% Alaska product preference per AS 36.30.332.</li> <li>15% Employment program preference per AS 36.30.321(b).</li> <li>10% Alaskans with disabilities preference per AS 36.30.321(e).</li> <li>7% Local agricultural and fisheries product preference per AS 36.15.050.</li> <li>Recycled product preference per AS 36.30.337.</li> </ul> <p>Only timber, lumber or manufactured lumber products originating in Alaska shall be used unless it is determined to be impracticable under AS 36.15.010.</p> <p>Valid Alaska business license required at the time the contract is awarded per AS 36.30.110. To qualify as an Alaska bidder, as defined under AS 36.30.990(2), a valid Alaska business license is required at the time designated for bid opening.</p> <p>You must issue a written Notice of Intent to Award (AS 36.30.365).</p> <p>Written determination required if awarding to a nonresident per AS 36.30.362.</p>	<p>Copy of:</p> <ul style="list-style-type: none"> <li>Original ITB.</li> <li>RAP (if used).</li> <li>All bids including late bids.</li> <li>All bid amendments.</li> <li>ITB bidlog.</li> <li>Vendor list or advertising order.</li> <li>The name of each bidder, bid prices, and other appropriate information tabulated under AS 36.30.140 and 2 AAC 12.150.</li> <li>Relevant ITB correspondence.</li> <li>Contract document.</li> <li>All determinations required by statute, regulation, or the Alaska Administrative Manual.</li> <li>Notice of Intent to Award.</li> <li>Protest, if filed; procurement officer's decision, protest report, appellant comments, appeal, Commissioner's decision if applicable.</li> </ul>

## Appendix 5: State Website Screenshots

These websites show what helpful state websites can look like.

### Tennessee Department of Education – SNP Resources

**TN** Department of Education

Go to TN.gov

Search Education

Top Links ▾ About TDOE ▾ Best for All ▾ Districts ▾ Educators ▾ Families ▾ Students ▾ News

HURRICANE HELENE

TENNESSEE FAMILIES: MULTIPLE PROMOTION PATHWAYS AVAILABLE FOR 3RD GRADE STUDENTS

### SNP Resources

**SNP Resources**

Administrative Review

Eligibility Guidance ▾

Financial Management ▾

FSMC and Vended Meal Resources

Waivers/Startup Documents

Listserve

Program Enrichment

Meal Counting

Operational Requirements ▾

Programs

Provisional Feeding ▾

Marketing Materials

School Nutrition Training

School Nutrition Directory


The SNP Resource Hub is designed to provide easy, online access to topics related to the National School Lunch Program (NSLP), School Breakfast Program (SBP), Afterschool Snack Program, Seamless Summer Program, and Fresh Fruit and Vegetable Program. SNP requirements include the administrative review, student eligibility, financial management, meal counting for federal reimbursement, and other operational requirements. The state agency's administrative review provides a comprehensive evaluation of school meals programs for school food authorities (SFAs) participating in the NSLP and SBP, and includes both critical and general areas of review.

[School Nutrition Meals, Accounting, and Claiming Login](#)

The information listed below serves as an overview of what you can find on each resource page link. We encourage you to use these pages to explore detailed information about the program and other operational requirements.

- [Eligibility Guidance](#): Information to help state and local educational agencies accurately determine, certify, and verify children's eligibility for free and reduced price school meals and free milk.
- [Financial Management](#): Information on non-program revenue, direct and indirect costs, paid lunch equity, and more.
- [Waivers/Startup Documents](#): Program agreements, prototypes for letters and applications, waivers, equipment requests, and new SFA approval forms.
- [Listserve](#): There are three listservs to choose from: the regular listserv is for anyone involved in your district's program; the SNP supervisors listserv is SNP supervisors only; and the TSNA listserv is for TSNA members only. For more information on how to sign up for a listserv, please visit this page.
- [Program Enrichment](#): Guidance on the HealthierUS School Challenge: Smarter Lunchrooms and the farm to school program.
- [Meal Counting](#): Information on meal counting requirements, instructions on how to file a claim, edit check toolkits, and more.
- [Operational Requirements](#): Information on civil rights, HACCP, wellness policy, professional standards, smart snacks,





[Log Into ELIS](#)
[Log Into IWAS](#)
[Become a Teacher](#)
[Public School District Lookup](#)
[FRIS Inquiry](#)
[IL Report Card](#)
[About the Agency and Board](#)
[Topics A-Z](#)

[Home](#) > [Nutrition](#) > [Financial Management](#)

NUTRITION

Financial Management

- General Procurement for All Programs
- SFSP/CACFP Vended Meals Contracts
- SNP FSMC/Vended Meals Contracts
- SNP Resource Management

## NUTRITION FINANCIAL MANAGEMENT

The Illinois State Board of Education Nutrition Department's Financial Management section of the website provides rules and resources to Child Nutrition Programs sponsors on procurement, contracts, and other financial matters. Child Nutrition Programs includes sponsors participating in the Child and Adult Care Food Program (CACFP), Summer Food Service Program (SFSP), and the School Nutrition Programs (SNP), which includes the National School Lunch Program and other school-based programs.

Procurement means the process of obtaining goods and/or services in accordance with applicable rules and regulations.

Resource Management for School Nutrition Programs includes four general areas: Maintenance of Non-Profit School Foodservice Account, Paid Lunch Equity (PLE), Revenue from Nonprogram Foods, and Indirect Costs.

News and Updates

- Tentative List of SFAs Mandated to Procure FSMC or Vended Meals Contract
- Passage of HB 4813 - Procurement Options and Q&A Document
- RFP Vs. IFB - What's Best for my SFA?
- Summary of HB 4813 PowerPoint Slides
- Public Act 102-1101/105 ILCS 5/10-20.21 (HB 4813 became PA 102-1101 upon passage, which in turn amended the IL School Code)

General Procurement for All Programs

SFSP/CACFP Vended Meals Contracts

SNP FSMC/Vended Meals Contracts


SNP Resource Management

CNP NEWSLETTERS


TRAINING OPPORTUNITIES

Fact Sheets

Official State of Rhode Island website
Settings



STATE OF RHODE ISLAND  
**Department of Education**  
Child Nutrition Programs



Home

Child Nutrition

Nutrition Programs

National School Lunch

Child Nutrition

Free or Reduced-Price School Meals Application

Get the Foam Out!

Resource Library +

Nutrition Programs -

National School Lunch

Special Milk

School Breakfast

Child and Adult Care Food

After School Snack and Meals

Fresh Fruit and Vegetable

Summer Food Service

Announcements & Alerts

Upcoming Training

Regulations & Guidance +

Program Data & Finances

CNP Connect

Contact Us

## National School Lunch Program

In Rhode Island, the National School Lunch Program provides nutritious, low-cost or no-cost lunches to over 65,000 children daily. Schools that take part in the lunch program get cash subsidies and donated foods from USDA.

Participating program Sponsors include all public schools, state schools and charter schools, and some private schools, special needs citizen centers, and residential child care institutions.

State law mandates that all public schools provide lunch through the National School Lunch Program.

Children from families with income:

- Up to 130% of poverty level are eligible for free meals.
- Between 130 to 185% of poverty level are eligible for reduced-price meals (\$.40 or less).
- Over 185% of poverty pay a price determined by the school or institution for their subsidized meal.

58% of the lunches served in Rhode Island are served free or at the reduced price.

For additional program information contact:

✉ [Jennifer Goodwin, MS, RD](#) or ✉ [Amna Farahat](#)

+ RIDE Recorded Trainings & Webinars

+ Resource Library

+ Community Eligibility Provision

+ Procurement & Food Service Management Companies (FSMCs)

+ School Kitchen Equipment & Design



+ Sustainability in School Meals

+ School Wellness Policies

+ Healthy Snacks & Beverages in Schools


+ Administrative Review Summaries

## Michigan Food and Nutrition Programs – Procurement and Contracts


 **Department of Education** 

About Us ▾ Services ▾ Resources ▾ News & Info ▾ Contact Us

# Procurement and Contracts


 > [Services](#) > [Food & Nutrition Programs](#) > [Procurement and Contracts](#)

### Topics




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CNP  
Food Service  
Contracts

[Food Service Contracts](#)




Resources

[Resources](#)



School Nutrition  
Program  
Procurement  
Reviews

[School Nutrition Program  
Procurement Review](#)



Local  
Purchasing

[Local Purchasing](#)

**USDA Nondiscrimination Statement**

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## Appendix 6: List of Trainings Identified

Name of Training	Provided By	Format	Open Access?
Basics of the Procurement Process	Texas Department of Agriculture	Video and Interactive Training	Yes
Keys to a Successful Procurement Review	Texas Department of Agriculture	Video and Interactive Training	Yes
Procurement with Cooperatives	Texas Department of Agriculture	Video	Yes
Annual Training for School Nutrition Programs	Vermont Agency of Education	Interactive Training	Unsure
School Nutrition Leadership Academy	North Carolina Department of Public Instruction	Interactive Training	Unsure
CNS Procurement in Child Nutrition Programs	Washington Office of Superintendent of Public Instruction	Canvas training	No
School Nutrition Programs Annual Training 2024	West Virginia Department of Education	Interactive Training	Unsure
School Nutrition Program Annual Administrative Training	Kansas State Department of Education	Unable to determine	No
CNP: Procurement 101	Michigan Department of Education	Interactive Training	Yes
CNP: Procurement Reviews	Michigan Department of Education	Interactive Training	Yes
Procuring a Vended Meals Contract: The Bid Process for School Sponsors	Michigan Department of Education	Interactive Training	Yes
Procuring a Food Service Management Company Contract: The Bid Process for School Sponsors	Michigan Department of Education	Interactive Training	Yes
Procurement Session 1: Methods of Procurement and Procurement Regulations	Arkansas Division of Elementary and Secondary Education	Video and Quiz	Yes
Procurement Session 2: Bids, RFPs, and procurement plans	Arkansas Division of Elementary and Secondary Education	Video and Quiz	Yes



Procurement Session 3: Managing the procurement process, do's and don'ts for program operators	Arkansas Division of Elementary and Secondary Education	Video and Quiz	Yes
Buy American U.S. Agriculture Supporting Healthy School Meals (2 Training Hours)	Institute of Child Nutrition	In-person	Materials are free, training must be requested
Forecasting the Procurement of Foods (4 training hours)	Institute of Child Nutrition	In-person	Materials are free, training must be requested
Procurement of Foods: Cooperative Purchasing Groups (6 training hours)	Institute of Child Nutrition	In-person	Materials are free, training must be requested
STAR: Procurement Best Practices for Sourcing Locally Grown Foods	Institute of Child Nutrition	Live virtual	Unsure
National Procurement Training for Child Nutrition Programs	US Department of Agriculture	In-person	No (train-the-trainer format for state agency personnel)
Buy American Provisions Webinar	US Department of Agriculture	Video	Yes
State Agency Geographic Preference Webinar	US Department of Agriculture	Video	Yes
Partners Geographic Preference Webinar	US Department of Agriculture	Video	Yes
USDA Foods in Schools Ordering and Purchase Update Webinar	US Department of Agriculture	Video	Yes
Seeding Success 2022 Webinar 3: Purchasing Outside the Box: Local Procurement Beyond the Apple	US Department of Agriculture	Video	Yes
Seeding Success 2022 Webinar 2: Track It! How to Make Your Farm to School Efforts Count	US Department of Agriculture	Video	Yes
Planning Toolkit: Finding and Buying Local Foods	US Department of Agriculture	Video	Yes
Finding, Buying and Serving Local Food - Introduction to Procurement	US Department of Agriculture	Video	Yes

Contracting with a Food Service Management Company	Pennsylvania Division of Food and Nutrition	PDF	Yes
ABCs of school Nutrition	University of Illinois Urbana-Champaign	Interactive and Video	Unsure
Considering FSMC	Indiana Department of Education	Webinar	Yes
Completing the RFQ or IFB for Vended Meals	Indiana Department of Education	Webinar	Yes
Completing the RFP for a FSMC	Indiana Department of Education	Webinar	Yes
Managing FSMC Contracts	Indiana Department of Education	Webinar	Yes
Ending FSMC Contract Agreement	Indiana Department of Education	Webinar	Yes
Food Service Management Contracts Training	Tennessee Department of Education	Webinar	Yes
Serving with Success (Training Modules)	Missouri Department of Elementary and Secondary Education	Webinar	Yes
USDA Foods: what you need to know for school year 24-25	Missouri Department of Elementary and Secondary Education	Webinar	Yes
FSMC Contracts	Missouri Department of Elementary and Secondary Education	Webinar	Yes
Basic Procurement	Missouri Department of Elementary and Secondary Education	Webinar	Yes
FSMC RFP and Contract Basics	Missouri Department of Elementary and Secondary Education	Webinar	Yes
New Food Service Director Basics	Missouri Department of Elementary and Secondary Education	Webinar	Yes
General Procurement	New York State Education Department	Webinar	Yes
Food Service Management Company	New York State Education Department	Webinar	Yes
Farm to School & Local Procurement	New York State Education Department	Webinar	Yes

Local Food for Schools (LFS) Cooperative Agreement Program	New York State Education Department	Webinar	Yes
NSLP Meal Pattern & Required Documentation	Rhode Island Department of Education	Webinar	Yes
SNP General Procurement Training	Rhode Island Department of Education	Webinar	Yes
School Nutrition Programs Procurement Review Training	Rhode Island Department of Education	Webinar	Yes
FSMC vs. Vended Meals	Rhode Island Department of Education	Webinar	Yes
Evaluating FSMC Proposals	Rhode Island Department of Education	Webinar	Yes
FSMC Monitoring	Rhode Island Department of Education	PDF	Yes
SNP USDA Foods Training	Rhode Island Department of Education	Webinar	Yes
SNP General Requirements	Rhode Island Department of Education	Webinar	Yes
Farm to School Training	Rhode Island Department of Education	PDF	Yes

## Appendix 7: Entities/Organizations Interviewed in Prior Research

### Jurisdictions

Alameda County Probation Department (CA)  
NYC Mayor's Office of Food Policy (NY)  
City of Chicago (IL)  
San Francisco Unified School District (CA)  
Boston Public Schools (MA)  
Alachua County Public Schools (FL)  
District of Columbia Public Schools (DC)  
Perquimans County Schools (NC)  
California Department of Food and Agriculture, Office of Farm to Fork (CA)  
Minneapolis Public Schools (MN)  
Los Angeles Unified School District (CA)  
North Dakota Department of Public Instruction (ND)  
San Luis Coastal Unified School District (CA)  
Oxnard Union High School District (CA)  
Fresno Unified School District (CA)

### Organizations

Boston Area Gleaners  
Center for Good Food Purchasing  
Chicago Food Policy Action Council  
Food Law & Policy Clinic, Harvard Law School  
ID Food Systems Action Lab, Institute of Design, Illinois Tech  
Massachusetts Farm to School Network  
SPUR  
The SF Market  
Turner Environmental Law Clinic, Emory University School of Law



## Disclaimer

This project has been funded at least in part with Federal funds from the U.S. Department of Agriculture, Food and Nutrition Service, through an agreement with the Urban School Food Alliance. The content of this publication does not necessarily reflect the view or policies of the U.S. Department of Agriculture, nor does mention of trade names, commercial products, or organizations imply endorsement by the U.S. Government.

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All links provided in this report are accurate and correct at the time of publishing. However, given the constant dynamism of live websites and content updates, some of them could change and stop working soon after the publishing of this report.

Photos provided by USFA.

Graphics and map created by the Harvard Kennedy School Government Performance Lab.

## Endnotes

1. USDA Food and Nutrition Service, “National School Lunch Program - Child Nutrition Tables,” [www.ers.usda.gov](https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program), accessed January 15, 2025, <https://www.ers.usda.gov/topics/food-nutrition-assistance/child-nutrition-programs/national-school-lunch-program>.
2. School Nutrition Association, “School Meal Statistics,” accessed January 15, 2025, <https://schoolnutrition.org/about-school-meals/school-meal-statistics/>.
3. School Nutrition Association, “School Meal Statistics: Economic and Procurement Challenges” and “2024 School Nutrition Trends Report,” <https://schoolnutrition.org/about-school-meals/school-meal-statistics/#Economic>.
4. Urban School Food Alliance, “USDA Cooperative Agreement | Procurement Practices in School Meals: Making Real Change Work for Healthier Families the Urban School Food Alliance 60-Day Technical Report,” 2024, <https://urbanschoolfoodalliance.org/wp-content/uploads/Technical-Report.-2024.-60day.pdf>.
5. Specific regulations include Title 2 Federal Financial Assistance, Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Additional federal procurement requirements for school food programs are included in CFR Title 7 Agriculture, specifically Part 210.21 National School Lunch Program, Part 220.16 School Breakfast Program, and Part 225.17 Summer Food Service Program.
6. Adapted from Christina Connell, Maggie Gosselin, and Deborah Kane, “Procuring Local Foods for Child Nutrition Programs,” US Department of Agriculture Food and Nutrition Services, August 2015, <https://fns-prod.azureedge.us/sites/default/files/resource-files/June22F2SProcurementGuide508.pdf#page=4>.
7. “Grants and Agreements,” Code of Federal Regulations, 2 CFR 200.320(a)(1)(iv) (2024), <https://www.govinfo.gov/app/details/CFR-2024-title2-vol1/CFR-2024-title2-vol1-sec200-320>.
8. Kansas State Department of Education, “Director’s Toolkit for School Nutrition Programs,” June 2024, [https://cnw.ksde.gov/docs/default-source/snp/snp---food-service-facts/chapter-2-documents/c2\\_director\\_toolkit\\_june\\_202410791c95-974b-4f9d-91a9-ca56f5103327.pdf](https://cnw.ksde.gov/docs/default-source/snp/snp---food-service-facts/chapter-2-documents/c2_director_toolkit_june_202410791c95-974b-4f9d-91a9-ca56f5103327.pdf).
9. Texas Department of Agriculture, Food and Nutrition Division, National School Lunch Program, “Procurement Process Basics,” July 30, 2024, [https://tdafn.s3.amazonaws.com/Articulate/NSLP\\_Procurement\\_Basics\\_25%20updated/story.html](https://tdafn.s3.amazonaws.com/Articulate/NSLP_Procurement_Basics_25%20updated/story.html).
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