



Procurement Policy Fact Sheet

Applicable to all Child Nutrition Programs

School Nutrition Programs (SNP), the Special Milk Program (SMP), the Summer Food Service Program (SFSP), and the Child and Adult Care Food Program (CACFP)

What is a Procurement Policy?

- 2 CFR 200, as applicable, currently require entities receiving Federal funds to develop and implement a procurement policy designed to govern the performance of employees engaged in procurement.
- Each School Food Authority (SFA)/Sponsoring Organization is required to have its own documented procurement procedures in place that reflect applicable state and local laws and regulations, provided that procurements made with Child Nutrition Program funds adhere to the standards set forth in 2 CFR 200.318(a), and as applicable 7 CFR 210, 7 CFR 215, 7 CFR 225, and 7 CFR 226).

What must be included in a Procurement Policy?

- Must identify that the SFA/ Sponsoring Organization has oversight procedures and documentation.
- Must have written standards of conduct covering conflicts of interest that prohibit officers, employees and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors or parties of subcontracts.
- Must avoid acquisition of unnecessary or duplicate items.
- Must detail the procurement thresholds for micro-purchasing, small purchasing, and formal purchasing.
- Must include detailed procedures for each of the procurement thresholds.
- Must identify that contract award is only to responsible and responsive contractors.
- Must identify that the SFA/Sponsoring Organization is to maintain records sufficient to detail the history of the procurement.

Resources

- ISBE Nutrition Financial Management <https://www.isbe.net/Pages/Nutrition-Financial-Management.aspx>
- USDA Procurement Regulations <https://www.fns.usda.gov/cfs/usda-procurement-regulations>

For all questions concerning procurement, please contact ISBE at nutritionprocurement@isbe.net.