



Procurement Review Fact Sheet

Applicable to School Nutrition Programs

What is a Procurement Review?

- A procurement review is for state agencies to ensure the procurement process conducted by School Food Authorities (SFAs) complies with program (7 CFR 210) and the government-wide procurement standards (2 CFR 200).
 - *School food authority (SFA)* means the governing body which is responsible for the administration of one or more schools; and has the legal authority to operate the Program therein *or* be otherwise approved by FNS to operate the Program. This includes public schools, non-public schools, charter schools, and RCCI's.
- Procurement standards must be conducted in a manner providing full and open competitive set forth in 2 CFR 200.319(a).

Why is there a Procurement Review?

- Procurement is a major responsibility of each SFA – almost half of the SFA's reimbursement is used on the procuring of goods and/ or services.
- Procurement has a major impact on financial stability of the SFA's nonprofit school food service account.
- Not just another "food service" requirement. 2 CFR 200 applies to ALL federal grants and most SFAs receive Federal grants other than just from the Child Nutrition Program.

What can an SFA do to prepare for a Procurement Review?

- Conduct compliant procurement processes
- DOCUMENT! DOCUMENT! DOCUMENT!
- Ensure you have written, detailed procurement procedures that adhere to the standards set forth in 2 CFR 200.318(a).
- Ensure you have a compliant code of conduct that adhere to the standards set forth in 2 CFR 200.318(c)(1).
- Incorporate language in your procurement procedures, solicitations and contracts for food specification to ensure compliance with the Buy American provision
- Monitor contractors for compliance with specification, terms, and conditions of contracts
- Review your procurement process and procedures annually

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.