

A background image of a school cafeteria with students. A boy in a red hoodie is in the foreground, looking down at a food tray. Several girls are in the background, smiling. The image is overlaid with a dark blue semi-transparent layer.

MAINE DEPARTMENT
OF EDUCATION

Procurement 101: For School Nutrition Programs

Presented by: Sarah Platt, Child Nutrition



What Is Procurement?



- Shopping!
- The process of purchasing goods and services from a vendor in a manner that is:
 - Fair
 - Transparent
 - Competitive
 - Documented
- That results in getting the best possible value.
- Remember - You are spending federal, State and local dollars!

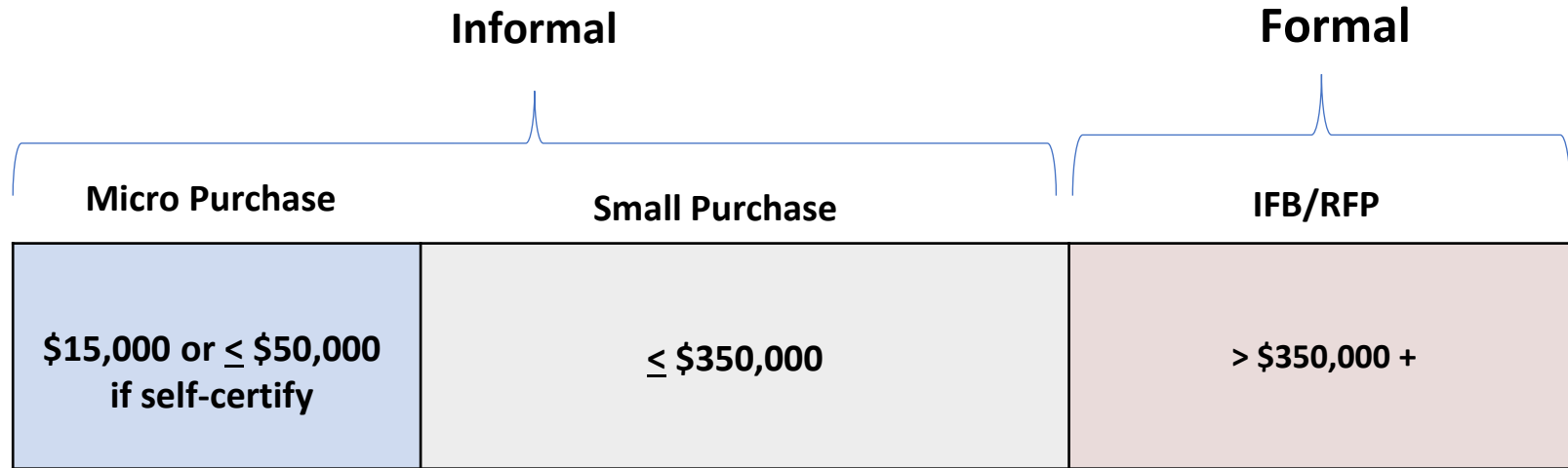
Everyday Procurement

- ✓ Buying a car
- ✓ Hiring a contractor
- ✓ Choosing cell phone service

- Budget
- Research options
- Compare pricing and evaluate
- Get the best deal



Federal Purchasing Thresholds*



*Local thresholds may be more restrictive. Check with your federal procurement policy.
This presentation uses federal thresholds

Micro-Purchase

*Federal thresholds as of 10/2025

- Simple, **non-competitive** procurement process
- Used when the value of the purchase is less than \$15k*
- Don't request a bid or price quotes
- Purchase from the vendor of your choice
- Prices must be reasonable



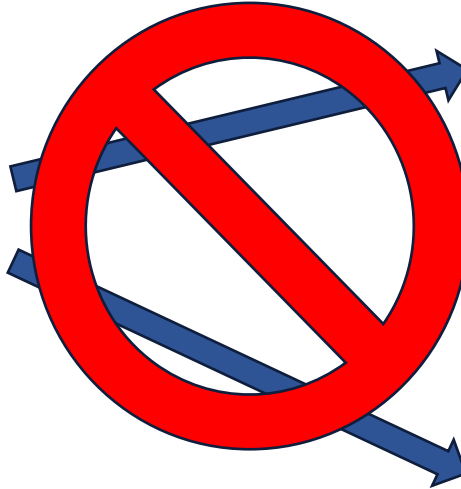
Micro-Purchase Threshold

*Federal thresholds as of 10/2025

- **Cannot** intentionally split a purchase to keep the amount under the micro-purchase threshold



240 cs of trays = \$23,000



Transaction #1
120 cs trays = \$11,500



Transaction #2
120 cs trays = \$11,500

Cannot intentionally split a purchase to keep the amount under the micro-purchase threshold



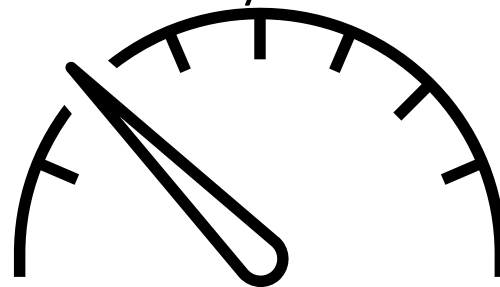
240 cs of trays = \$23,000



**Follow small purchase
or formal procurement
methods**

How to Self-certify for Micro-Purchase

1. Have documentation of being a low-risk auditee
 - Single audit shows to federal program, audit findings
2. Update procurement procedures stating you self-certify
3. Write a self-certification statement
 - Low risk
 - Why you want to self-certify
 - Sign & date
4. Repeat annually



Small Purchase

*Federal thresholds as of 10/2025

Price is the determining factor!

- **Competitive** procurement process:
 - Have clear, written criteria
 - Collect price quotes from 2-3 potential vendors (refer to your policy)
 - Compare (evaluate) responses
 - Purchase from vendor with the lowest price for what you asked for
- Maintain documentation for each step of the process

Small Purchase is Used When...

- Want the **lowest** price
 - Making recurring purchases from the same vendor
 - When the cost is below the formal procurement threshold (350k*)
-
- Examples: Food, Maintenance & repairs, equipment

Formal Purchase: IFB and RFP

- **Competitive** structured, public process
 - Have clear criteria, terms & conditions
 - Publicly advertise & solicit - Invitation for Bid (IFB) and Request for Proposal (RFP)
 - Evaluate using established criteria
 - Award a contract to lowest price, responsive & responsible vendor
 - May be written to renew up to 5 years
- Maintain documentation of the entire process
- Use when the cost is above the formal procurement threshold (350k*)

*Federal threshold as of 10/2025



**Which procurement method is
should I use?**

Think About...

☐ How much are you going to spend?

- Less than \$15K...micro-purchase
- More than \$15k but less than \$350K...small purchase
- Above \$250k ...formal

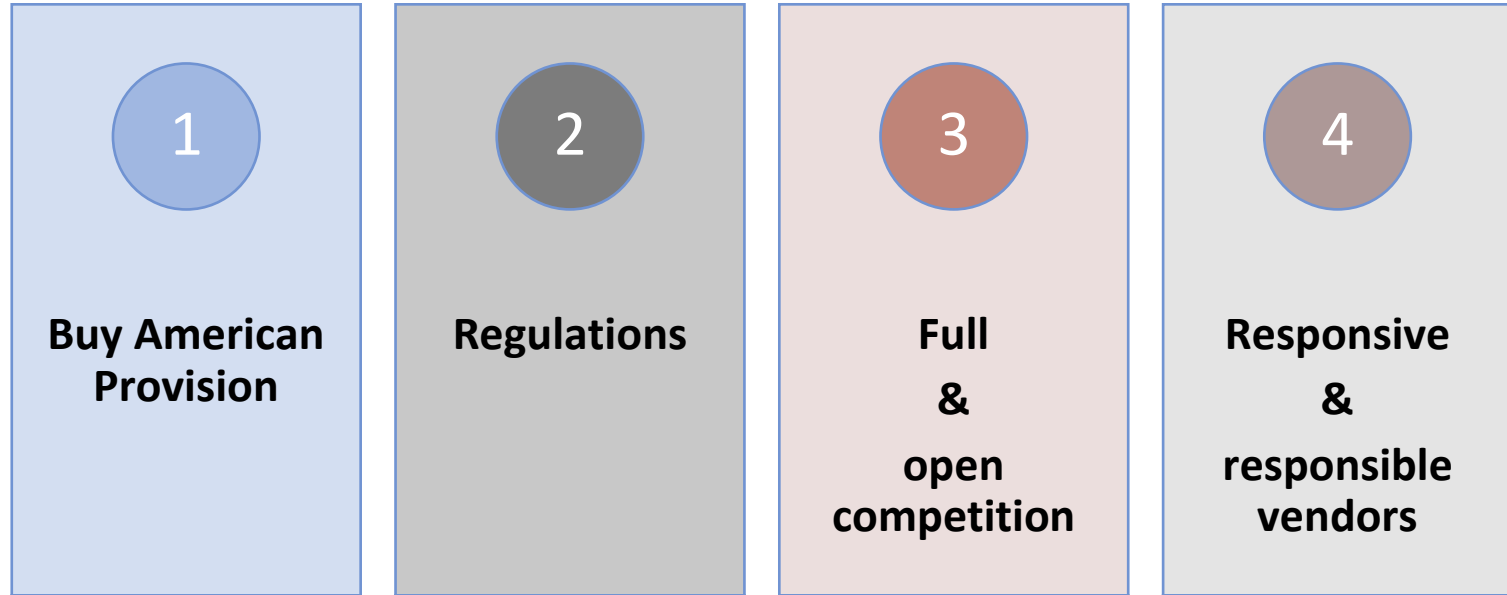
☐ What is the driving factor?

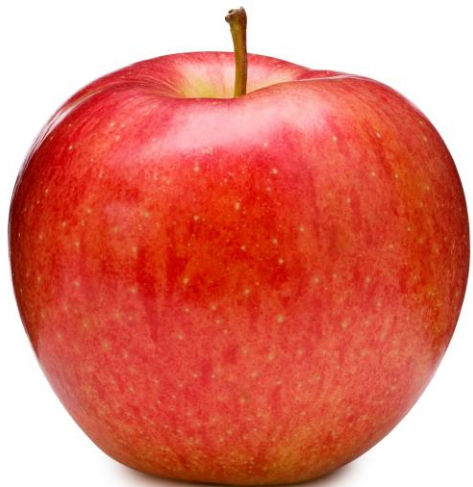
- Price...small purchase
- Other criteria...formal procurement

☐ Will this be a single purchase or a series of purchases?

- Single...micro-purchase
- Recurring...small purchase

Principals of Procurement





Applies to ALL food items, including spices, oil, flavorings, etc...

Buy American Provision

- Purchase, to the maximum extent possible:
 - *Unprocessed agricultural commodities* (food) grown in the US
 - *Processed food products* that contain over 51% agricultural commodities grown in the US AND processed in the U.S.



Buy American - Exceptions

- Availability
 - Product is not produced in the U.S. in sufficient quantities
ex. Bananas, mandarin oranges, pineapple
- Cost
 - Competitive bid reveals the cost of the U.S. product is significantly higher than the non-domestic product.
- Maintain documentation



Buy American - Compliance

Include *Buy American* requirement in procurement documents.

Request domestic product

Check labels:

- Packaging information
- Invoices/receipts
- Ask manufacturer for country-of-origin information

Buy American Provision Updates SY27



- The limit on the percent of **total** commercial food costs from non- domestic foods will be phased in over 7 school years.
- SY 2025-26 & 2026-27, the non- domestic food purchases cap will be 10 percent.
 - Beginning in SY 2028-29, the non- domestic food purchases cap will be 8 percent.
 - Beginning in SY 2031-32, the non- domestic food purchases cap will be 5 percent.

Buy American Provision Updates SY27



USDA's "Buy American Exceptions Tracking Standard Form"

- Available on our website with Buy American resources
- Helps you track compliance with the cap

2. Federal Procurement Regulations



2 CFR 200

All programs receiving federal funds

7 CFR 225.17

SFSP

7 CFR 210.21/7 CFR 220.16

NSLP/SBP

<https://www.ecfr.gov/>

3. Full and Open Competition

- Level playing field for all possible vendors
 - Equal opportunity to compete
- Being overly restrictive is not allowed
- Fairness, integrity and transparency is critical
- Essential for purchasing quality goods at the lowest possible price

4. Responsive and Responsible Vendors

- Purchase must be made from a vendor who is both *responsive AND responsible*.
- **Responsive:** Vendor provided the information that was requested
 - Ex. Submitted response after due date, not following directions
- **Responsible:** Vendor is capable of performing successfully under the terms and conditions of the contract
 - Ex. Can't meet delivery requirements or ordering requirements

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If you have questions, please contact a member of the [Child Nutrition staff](#).

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I want to purchase milk/food on a regular basis, and each transaction will be less than \$15,000.

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Could be micro-purchase:

Purchases should be distributed equitably among qualified suppliers as much as possible (recurring).

Prices should be reasonable.

Keep all receipts/invoices and note your justification for using the micro-purchase method.

If you want best price, use Small Purchase procurement

What do you think?

I need to purchase bread/milk/food on a regular basis, I want the lowest price, and each transaction will cost less than \$350,000

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Small purchase:

Develop clear and accurate descriptions of the item(s)/service(s) to be procured (solicitation & market basket)

Contact multiple vendors for price quotes, share identical information

Document responses

Evaluate – lowest price responsive & responsible vendor

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*I'm looking for someone to provide service/maintenance of equipment.
I'd like to use the same person/company repeatedly so they get to know
my school and equipment, and each transaction will cost less than
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Questions

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U.S. Department of Agriculture
Office of the Assistant Secretary for Civil Rights
1400 Independence Avenue, SW
Washington, D.C. 20250-9410; or

(2) fax:

(833) 256-1665 or (202) 690-7442; or

(3) email:

program.intake@usda.gov

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