

Leyden High School District #212

Comprehensive Procurement Procedures

School Nutrition Programs (SNP)

The purpose of this Procurement Procedures document is to ensure that all procurements made with School Nutrition Program (SNP) funds comply with:

- **2 CFR 200.318(a)** (Uniform Guidance)
- Federal Child Nutrition Program regulations
- Illinois School Code (105 ILCS 5/)
- Illinois State Board of Education (ISBE) guidance
- Applicable local procurement policies

The SFA maintains written procedures that ensure all procurement transactions provide **full and open competition**, are conducted ethically, and are properly documented.

The SFA will:

- Conduct all procurement transactions in a manner providing **full and open competition**
- Avoid acquisition of unnecessary or duplicative items
- Ensure all costs are **reasonable, allowable, and allocable**
- Maintain school board–approved, published procurement policies and procedures for all procurement transactions.
- Maintain oversight to ensure contractors perform in accordance with contract terms
- Not restrict competition through unreasonable requirements, noncompetitive practices, or conflicts of interest

Chairman, Board of Education: _____



Date: _____

6/18/26

Superintendent of Schools: _____



Date: _____

6/18/26

A. Procurement Procedures

The SFA's plan for procuring items for use in the Child Nutrition Programs is as follows. The procurement procedures maximize full and open competition, transparency in transactions, comparability, and documentation of all procurement activities.

1. Micro-Purchase Method

Threshold: Up to \$15,000 (or lower local threshold if applicable)

Procedures:

- No competitive quotes required
- Price must be determined reasonable
- Purchases distributed equitably among qualified vendors when possible
- Documentation includes vendor, item, cost, and justification of reasonableness

2. Small Purchase (Informal) Method

Threshold: \$15,001 – \$350,000 (or applicable lower state/local threshold)

Procedures:

- Obtain price or rate quotes from **an adequate number of qualified sources** (minimum of 2–3 recommended)
- Quotes may be written, email, or documented phone quotes
- Award made to lowest responsive and responsible vendor
- Maintain documentation of all quotes and selection rationale

3. Formal Procurement Method

Threshold: \$350,001 or more OR \$35,000+ for Illinois public schools (whichever is more restrictive)

Methods Used:

- **Invitation for Bid (IFB)** – price-based award
- **Request for Proposal (RFP)** – evaluation based on weighted criteria

Procedures:

- Public advertisement of solicitation
- Clearly defined specifications and evaluation criteria

- Sealed bids/proposals
- Public bid opening (IFB)
- Evaluation documentation maintained
- Award made to responsive and responsible vendor

B. Procurement Thresholds

The School Food Authority will adhere to the most restrictive procurement threshold as defined by local, state, and federal rules and regulations.

Federal Thresholds

The School Food Authority will use one of the following methods of procurement as outlined in federal regulations [2 CFR part 200](#):

1. [Micro-Purchase threshold](#) (Up to \$15,000):
Procurement by micro-purchase is the acquisition of supplies or goods when the aggregate dollar amount of which does not exceed \$15,000 for federal awards made on or after October 1, 2025. To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers, if applicable within a reasonable area. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.
2. [Small Purchase/Informal/ Simplified Acquisition Threshold](#): (\$15,001-\$350,000)
Simplified acquisition procedures: The aggregate dollar amount of the procurement transaction is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold. If simplified acquisition procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources. Unless specified by the Federal agency, the recipient or subrecipient may exercise judgment in determining what number is adequate.

Simplified acquisition thresholds. The recipient or subrecipient is responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk, and its documented procurement procedures, which may be lower than, but must not exceed, the threshold established in the FAR.
3. [Formal Procurement Threshold](#) (\$350,001 or more)
Formal procurement methods are required when the value of the procurement transaction under a Federal award exceeds the simplified acquisition threshold of the recipient or subrecipient. Formal procurement methods are competitive and require public notice. The following formal methods of procurement are used for procurement transactions above the simplified acquisition threshold determined by the recipient or subrecipient in accordance with federal regulations.
 - a. Invitation for Bid (IFB)
 - b. Request for Proposal (RFP)
4. [Food Service Management Company \(FSMC\)](#)

If/When soliciting for a Food Service Management Company a formal procurement must be conducted and the [Three-Step Solicitation Process](#) set forth by ISBE Nutrition must be adhered to.

State Thresholds

1. Public Schools purchasing non-perishable foods, supplies, equipment and/or services must formally procure when the value of the procurement transaction is greater than \$35,000.
2. Public Schools, as per [Public Act 102-1101](#), are only permitted to utilize the RFP method if the SFA gives scorable preference to all five items listed within the bill.

C. Conflict of Interest

A conflict of interest exists when an employee, officer, or agent:

- Has a financial or personal interest in a vendor
- Has family or business ties to a contractor

Procedures:

- Individuals must disclose conflicts in writing
- Recusal from procurement decisions is required
- Documentation of conflict resolution must be maintained

D. Avoidance of Unnecessary or Duplicative Items

The School Food Authority will avoid the acquisition of unnecessary and duplicative items.

E. Consolidate or Break out Procurement

The School Food Authority will not intentionally split purchases to have them fall below the micro- purchase or small purchase thresholds to avoid the formal procurement method. However, there may be instances in which a specific market supports the need to separate certain products from the overall procurement. Should the School Food Authority determine a separate procurement is required, supporting documentation must be made maintained.

F. Procurement Arrangements using Strategic Sourcing

When appropriate for the procurement or use of common or shared goods and services, are encouraged to enter into State and local intergovernmental agreements or inter-entity agreements for procurement transactions. These or similar procurement arrangements using strategic sourcing may foster greater economy and efficiency. Documented procurement actions of this type (using strategic sourcing, shared services, and other similar procurement arrangements) will meet the competition requirements of this part.

G. Value Engineering Clauses

Whenever possible the School Food Authority will consider use of value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

H. Responsible Contractors

The School Food Authority will award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

The School Food Authority will facilitate a competitive environment when conducting a procurement. Regardless of the procurement method used, the awarded contracts can only be made to a responsive contractor whose bid or proposal meets all of the minimum product or other requirements specified in the solicitation and who's a responsible contractor who can and will successfully fulfill the terms and conditions of the contract.

The School Food Authority shall award its contracts to the responsive, responsible contractors offering the best value, and whose offer or proposal is technically compliant with the requirements listed in the solicitation document. Awarded contracts shall be made to the bidder or proposer offering the lowest price, (being the highest ranked), or as otherwise prescribed in the solicitation. The use of the term bidder or offer or shall be understood to include any participant in the procurement process and the term bid or proposal shall be understood to include any offer in response to a solicitation.

I. Record Retention Policy

The School Food Authority will maintain records sufficient to detail the history of procurement. These records will include but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

The School Food Authority (SFA) will retain their program-related records for a period of 3-years from the day the SFA's final allowable payment under the contract has been recorded.

J. Protest Procedures

The School/District will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to, source evaluations protests, disputes, and claims. These standards do not relieve the non-Federal entity of any contractual responsibilities under its contracts. The Federal awarding agency will not substitute its judgment for that of the non-Federal entity unless the matter is primarily a Federal concern. Violations of law will be referred to the local, state, or Federal authority having proper jurisdiction. See the 'Ethics and Code of Conduct' section in this Procurement Policy and Procedures Manual for more detailed information on this topic.

The SFA will:

- Handle all procurement disputes in accordance with sound administrative practices
- Maintain written procedures for bid protests
- Document all decisions and resolutions

Violations of law will be referred to the appropriate authority.

K. Unfair Competitive Advantage

In order to ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids or requests for proposals will be excluded from competing for procurements issued by the School Food Authority.

L. Buy American – 7 CFR 210.21(d) and 220.16(d)

The School food Authority will adhere to the Buy American provisions found in federal regulation. Actions a School Food Authority must take to comply with these requirements are as follows:

- Include a Buy American clause in all food product procurement documents (product specifications, bid solicitations, purchase orders, etc.);
- Monitor contractor performance;
- Require suppliers to certify the origin of the product;
- Examine product packaging for identification of the country of origin; and
- Ask the supplier for specific information about the percentage of U.S. content in the food product

M. Geographic Preferences

The School Food Authority may use local as a specification and continue to set a geographical preference when soliciting or buying unprocessed agricultural products. When applicable for unprocessed agricultural products, the SFA may apply geographic preference with a defined “local” standard.

N. Solicitation of Small and Minority Business – 2 CFR 200.321

- a. When possible, the School Food Authority should ensure that small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms (See U.S. Department of Labor's list) are considered as set forth below.
- b. Such consideration means:
 1. These business types are included on solicitation lists;
 2. These business types are solicited whenever they are deemed eligible as potential sources;
 3. Dividing procurement transactions into separate procurements to permit maximum participation by these business types;
 4. Establishing delivery schedules (for example, the percentage of an order to be delivered by a given date of each month) that encourage participation by these business types;
 5. Utilizing organizations such as the Small Business Administration and the Minority

Business Development Agency of the Department of Commerce; and

6. Requiring a contractor under a Federal award to apply this section to subcontracts.