

Procurement Review Documentation Checklist For Child Nutrition Program Sponsors

The USDA has set expectations for State Agencies to monitor all sponsors' procurement procedures, as required in Federal Program regulations at 7 CFR 210.21 and in 2 CFR 200.318 through 326. State regulations also apply for procurement activities as required in MCL - Section 380.1274.

Required Documentation

Procurement Procedures

Must include the following provisions:

- General Procurement (2 CFR 200.318)
- Competition (2 CFR 200.319)
- Methods of Procurement (2 CFR 200.320)
- Small and Minority Businesses and Women's Business Enterprises (2 CFR 200.321)
- Cost and Price Analysis (2 CFR 200.324)
- Availability of Documents for Review (2 CFR 200.325)
- Contract Provisions (2 CFR 200.327, 2 CFR Appendix II)
- Buy American (7 CFR, sections 210.21(d) and 220.16(d))

Code of Conduct

Must include the following provisions:

- Conflicts of Interest, Disciplinary Action, and Gratuities, Favors, or Gifts (2 CFR 200.318 (c)(1))
- Organizational Conflicts of Interest (2 CFR 200.318 (c)(2))

Policy

- School board or board of directors' policies governing the procurement of supplies, materials, and equipment.

Vendor Paid List

- Excel format
- Summary of total expenditures by vendor report (Non-Profit Food Service Account transactions only)

Supporting Documentation

Micro Purchases

- 3 invoices or receipts per vendor selected

Small Purchases

- 3 invoices or receipts per vendor selected
- Quotes/responses received (may include)
 - Pricing sheets
 - Email records
 - Non-responses are also responses (must document this)
- Evaluation, award, and justification

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Formal Purchases

- Full Bid Packet per vendor selected
 - Solicitation documents (RFP/IFB)
 - Specifications
 - Evaluation criteria and responses
 - Contract terms and conditions
 - Proof of advertisement
 - All bid responses/proposals
 - Contract award
 - 3 invoices or receipts per vendor selected

 - Group Purchasing Organization, Consortium, Child Nutrition Program Operator Cooperative, 3rd Party Agent** (*USDA Foods procurement is reviewed separately*)
 - Initial solicitation
 - Award information
 - Copy of contract
 - Any related supporting documentation

 - Food Service Contract Documentation**
 - 12 months of invoices
 - 12 months of operating statements (FSMC Cost Reimbursable Contracts Only)
 - Reconciliations supporting your school district's Planned Assistance Level (PAL) Report
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Additional Information

For further guidance on procurement review requirements:

- 2 CFR, sections [200.318–200.327](#) on the Electronic [Code of Federal Regulations](#).
- [USDA Policy Memo SP 38-2017](#) Compliance with and Enforcement of the Buy American Provision in the National School Lunch Program (NSLP), and [USDA Policy Memo SP 23-2024](#) Buy American Provision Related to the Final Rule Titled, *Child Nutrition Programs: Meal Patterns Consistent with the 202-2025 Dietary Guidelines for Americans*.
- Michigan Revised School Code Section [380.1267](#)
- Michigan Revised School Code Section [380.1274](#)

Procurement Resources and Templates

<https://www.michigan.gov/mde/services/food/procurement-and-contracts/school-nutrition-program-procurement-reviews>

<https://www.michigan.gov/mde/services/food/procurement-and-contracts/resources>