



Southwest Georgia STEM Charter School Nutrition Procurement Plan

OVERVIEW

The Southwest Georgia STEM Charter School Nutrition Program will follow the procurement procedures reflecting applicable Federal, State and local laws, regulations, and policy found on the following pages. (7 CFR 210.21(a), 2 CFR 200.318-327 and Appendix II to Part 200). The SFA will ensure maximum full and open competition and maintain all documentation and records sufficient to detail the procurement process. 2 CFR 200.318(a) and 2 CFR 200.318(i).

This procurement plan applies to the National School Lunch Program (NSLP, 7 CFR 210.21), School Breakfast Program (SBP, 7 CFR 220.16), Special Milk Program (SMP, 7 CFR 215.14(a)), and Food Distribution Program (7 CFR 250.4(d)) with all program specific procurement requirements as appropriate.

The following are responsible for implementing or insuring execution of the procurement plan as written:

Name: Ginger Almon Title: Superintendent

Name: Lori Wilson Title: CFO

Name: Michelle Andrews Title: SFN Manager

Southwest Georgia STEM Charter School Certification of Annual Review

The procurement plan and procedures contained within this document will be implemented on **June 11th, 2026** and will remain in effect from this date forward until amended.

This plan will be reviewed annually and revised and updated as needed.



Superintendent:  Date: 6/11/2026
Signature

Business Official:  Date: 6/11/2026
Signature

School Nutrition Manager:  Date: 06/11/2026
Signature

Reviewed: Dates and by whom (use initials): _____

Revised/Updated: Dates and by whom (use initials): _____

**Southwest Georgia STEM Charter School Nutrition Program
Procurement & Bid Procedures**

**OVERVIEW OF SOUTHWEST GEORGIA STEM CHARTER SCHOOL
PROCUREMENT THRESHOLDS:**



The SFA will purchase goods, products, and/or services in compliance with the Federal Regulations (7 CFR 210.21 and 2 CFR 200 subpart D and Appendix II to part 200), State law and rules and local Board of Education policies when procuring items. The primary purpose of this procurement plan is to ensure open and free competition exists to the maximum extent possible. The procurement process practiced by the SNP must not restrict or eliminate competition.

The **Southwest Georgia STEM Charter** School Nutrition Program will forecast projections of the amounts of goods or services to be purchased by using inventory usage data, historical reports, and FTE projections.

- A. Items valued at \$15,000 or less may be procured following the **micro-purchase method**.
- B. Items valued at more than \$15,000 but less than \$350,000 for informal purchase method or when quotes are collected for items valued at less than \$15,000 will be purchased using the informal **simplified acquisition method**.
- C. All solicitations valued in excess of \$350,000 or more must be advertised for bids or proposals under the **formal purchase methods**.

PROCUREMENT METHODS:

A. MICRO PURCHASE METHOD: less than or equal to \$15,000:

Any item(s) with a forecasted value of less than or equal to \$15,000 will be procured by the Micro Purchase procurement procedure (2 CFR 200.67 & 2 CFR 200.320 (a)(1)). These purchases may be awarded without soliciting competitive quotes if the entity considers the price reasonable, keeping in mind that multiple purchases throughout the year must be equitably split among all qualifying vendors.

- A. The price will be verified for reasonableness by comparing previous purchases and comparing the purchase to similar items. Documentation will be maintained.
- B. A new product may be purchased on a one-time basis if the purpose is to evaluate the product and if this evaluation is documented. The cost may not exceed \$15,000.
- C. Ensure equitable distribution among qualified suppliers when the same or similar items are procured as cited in 2 CFR 200.320(a)(1)(i). The distribution of forecasted purchases among qualified suppliers is done by choosing one qualified supplier for the purchase and another qualified supplier the next time a micro purchase is made. Each of the purchase transactions cannot exceed \$15,000. A micro purchase log should be completed to document compliance.
- D. Purchase records must be maintained for 5 years, plus the current year. Micro purchase documentation may include cash register receipts, purchase orders, invoices, canceled checks, or other documentation showing the quantity purchased and the amount paid. A micro purchase log should be completed to document compliance.

B. SIMPLIFIED ACQUISITION METHOD: Up to \$350,000:



Simplified Acquisition procedures utilize informal procurement methods for securing goods and services that does not exceed **\$350,000**. Quotes from more than one (1) qualified vendor/supplier will be obtained and documentation will be maintained. (2 CFR 200.88 & 2 CFR 200.320 (a)(2)).

- A. Goods or services valued higher than \$15,000 and less than \$350,000 will be procured using the simplified acquisition method.
- B. Specifications will be prepared to fit the needs of the School Nutrition Program (SNP) per 2 CFR 200.319(d). The SFA will incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description will not contain features which restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured and, when necessary, the minimum standards it must meet to satisfy its intended use. Detailed product specifications will be avoided. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equivalent" description must be used. The specific features of the named brand, which must be met by vendors, must be clearly stated. Specifications will identify all requirements which the vendors must fulfill and all other factors to be used in evaluating quotes.
- C. Quotes may be obtained in writing; orally; checking vendor list on website or an on-line search engine. Each quote will be based on the same specifications to ensure full and open competition. If contacting vendors to obtain quotes, provide the vendors with the same specifications and maintain documentation of the process. More than 1 source of pricing will be obtained. The State Agency recommends a minimum of 3 sources be secured.
- D. Contracts/Purchase Orders or other appropriate methods of purchase will be awarded to the vendor with the lowest price meeting specifications. When the lowest quote is not accepted, the reason for unacceptability shall be recorded and documented.
- E. Documentation of purchases must be maintained for five years plus the current year. The SFA will designate a person responsible to review and maintain all documentation showing the specifications, selection of vendor, reasons for selection, and the names of all vendors contacted, and the price quotes from each vendor. The SFA will designate a person who will be responsible for documenting that the actual product specified is received. A quote tabulation log may be utilized to document compliance.

C. COMPETITIVE PURCHASE METHODS: \$350,000.00+

This method applies to purchases of goods or services when the aggregate cost amount is more than \$350,000. The competitive procurement method requires the use of an Invitation for Bid (IFB) or a Request for Proposal (RFP).

1. INVITATION FOR BID (IFB):



All goods/services with a forecasted value exceeding \$350,000 may utilize a formal competitive *bid* (2 CFR 200.320(b)(1)) through an **Invitation for Bid (IFB)**. This type of competitive solicitation implements a detailed, non-restrictive list of specifications that result in a firm, fixed price contract.

- A. After items for purchase are identified, the SFA will prepare bid specifications consistent with the Procurement Methods Timeline. The SFA will conduct a cost/price analysis prior to soliciting. Specifications should include a precise description of the goods or service being procured. It should include the characteristics of the goods or services that is mutually understood by the buyer and seller. Product description must not be overly restrictive. If a specific product is listed the terminology "or equal" must be included.
- B. The IFB with standard terms and conditions, special terms and conditions, specifications with quantities needed, required forms, contract, addenda, and any other applicable documentation will be e-mailed or mailed through US Postal Service (USPS) to potential contractors desiring to bid on the product(s).
- C. The solicitation will be posted on the school system website, local newspaper, and/or other media outlets as appropriate. Any bids valued at \$100,000 or more must be posted on the Georgia Procurement Registry as required in O.C.G.A. 36-80-27.
- D. To ensure full and open competition, each vendor must be given an opportunity to provide bids on the same specifications.
- E. Requirements for how a vendor should submit a bid in response to the IFB solicitation will be clearly instructed in the IFB documentation.
- F. The IFB will define the purchase Terms and Conditions. Contract conditions for accepting and rejecting bids, contract periods, submission deadline, vendor notification, method of contract award, escalation and de-escalation clause information. Any access requirements and record retention requirements will be stated. Vendor certifying non collusion as required in O.C.G.A. 50-5-67 and 45-10-20 et seq.
- G. Bid procedures to resolve any disputes will be provided in the contract terms and agreement. A bid tabulation will be posted on the School's website to share how the bids were rated.
- H. The following criteria will be used in awarding contracts as a result of bids. (Examples: quality, delivery, service, etc.)
 - i. Price
 - ii. Service
 - iii. Quality
 - iv. Delivery: this includes that vendor can meet the specified delivery schedule
 - v. Responsiveness: this includes meeting or exceeding the product specifications
 - vi. Training
 - vii. Installation



- I. The SFA will maintain oversight to ensure contractors perform in accordance with terms, conditions, and specifications of awarded contracts or purchase orders. 2 CFR 200.318(b)
- J. The SFA is the responsible authority regarding the settlement and satisfaction of all contractual and administrative issues arising out of procurement. Should the need arise, matters concerning violation of law are to be referred to the local, state, or Federal authority that has proper jurisdiction. 7 CFR 210.21(b).
- K. The CFO is responsible for the oversight and elimination of the purchasing of duplicate or unnecessary items. 2 CFR 200.318(d). The reviewing official is identified in the SFA's procurement plan.
- L. The School Leader or designee is required to sign on a bid tabulation of competitive sealed bids signifying a review and approval of the selection(s). The SFA must maintain records to detail the full history of procurement and contract performance and management. These will include but are not limited to the following: rationale for procurement method, selection of contract type, contractor selection or rejection, and the basis for the contract price. Documentation must be maintained for five (5) years plus the current year.
- M. School Nutrition bids will be presented to the Board of Education for approval, if they are above the School Leader's approved spending threshold.

2. REQUEST FOR PROPOSAL (RFP):

All goods/services with a forecasted value exceeding \$350,000 may utilize a formal competitive proposal (2 CFR 200.320(b)(2)) or a **Request for Proposal (RFP)**. This type of competitive solicitation utilizes negotiations, proposals, and evaluations and will result in a fixed price or cost reimbursable contract.

In awarding a competitive proposal (RFP), a set of award criterion in the form of a weighted evaluation sheet will be provided to each bidder in the initial bid materials. Price alone is not the sole basis for award but remains the primary consideration when awarding a contract. Following evaluation and negotiations (if applicable) a firm fixed price, or a cost reimbursable contract will be awarded. If a cost reimbursable contract is awarded, the contractor must comply with all provisions required in 7 CFR 210.21(f).

With this procurement method, Southwest Georgia STEM Charter School will use the following steps:

1. Provide detailed identification of the items that will be procured.
2. Specify the product consistent with the procurement timeline. SGSC will conduct a cost/price analysis prior to soliciting. Specifications will include a precise description of the goods or services being procured in a manner that is mutually understood.
3. The Request for proposal and all supporting documentation may be emailed or mailed to



potential bidders.

4. The solicitation will be advertised on the school system website, and/or media outlets as appropriate.
5. Any proposals valued at \$100,000 or more must be posted on the Georgia Procurement Registry as required in O.C.G.A. 36-80-27.
6. To establish full and open competition, each vendor will be given an opportunity to provide a proposal on the same specifications. The SFA or designee will be responsible for securing all RFPs to ensure all procurements are conducted in compliance with applicable Federal regulations, state and local, rule, and policy.
7. Vendor Response: A vendor's bid for consideration in response to the RFP is required to be returned in person, by courier, or through the USPS. Emailed bid or facsimile responses will not be accepted.
8. Terms and Conditions: The RFP will clearly define the purchase conditions. At a minimum, the following shall be addressed:
 - i. Contract may be fixed price or cost reimbursable
 - ii. The SFA reserves the right to accept or reject any or all proposals or to accept any part of a proposal without accepting the whole or to accept such bid as may be deemed in the best interest of the SFA.
 - iii. Contract period including initial term, extension option, and renewal option
 - iv. Date, time, and place bid must be received.
 - iv. Bid submission requirements (i.e. in a sealed envelope and how labeled, submitted return receipt, must be submitted as an electronic document on a 2.0 flash drive, documents required, late arrivals, etc.)
 - v. Date, time, and location the bid will be opened.
 - vi. Description of how the vendor will be informed of bid acceptance or rejection
 - vii. Method of shipment or delivery upon contract award
 - viii. Escalation/De-escalation clause based upon appropriate standard or cost index provided by a third party such as Milk Market Order, Agricultural Marketing Service (AMS), etc. if applicable
 - ix. Provision requiring access by duly authorized representatives of the County/City Board of Education, State Agency, United States Department of Agriculture or Comptroller General to any books, documents, papers, and records of the contractor which are directly pertinent to the contract.
 - x. Provision requiring contractor to maintain all required records for five years after final payment and all pending matters are closed.
 - xi. Vendor will certify the proposal was made without prior understanding, agreement or connection with any corporation, firm or person submitting a proposal for the same materials, supplies or equipment and is in all respect fair and without collusion or fraud. Vendor will provide a signed statement certifying non-collusion as required in O.C.G.A. 50-5-67 and 45-10-20 et seq.
 - xii. Proposal protest procedures to resolve any disputes that may arise will be provided in the contract terms and conditions.
 - xiii. If any potential vendor/contractor is in doubt as to the true meaning of specifications or purchase conditions, an interpretation will be provided by SFA or designee.



- xiv. Required Contract Provisions must be included with the vendor contract for procurement.
9. Evaluation of Proposals: Price will be the primary determining factor and all other criteria weighted accordingly. Additional criteria may include:
- i. Service
 - ii. Quality
 - iii. Delivery: How many deliveries, the time of delivery, delivery schedule during holidays.
 - iv. Responsiveness
 - v. Training
 - vi. Installation
 - vii. Geographic preference
 - viii. Warranty
10. Contract Award: The contract(s) will be awarded to the responsible vendor whose proposal is responsive to the Request for Proposal and best meets the needs of the SFA, price, and terms and conditions. Consideration will be given to factors such as integrity, compliance with public policy, record of past performance, and financial and technical resources.
11. Contract Oversight: The SFA will maintain oversight to ensure contractors perform in accordance with terms, conditions, and specifications of awarded contracts or purchase orders. 2 CFR 200.318(b)
12. Contractual Responsibilities: The SFA is the responsible authority regarding the settlement and satisfaction of all contractual and administrative issues arising out of procurement. Should the need arise, matters concerning violation of law are to be referred to the local, state, or Federal authority that has proper jurisdiction. 7 CFR 210.21(b)
13. Review of Transactions: The SFA's Board of Education agrees that the reviewing official of each transaction (Superintendent or his designee) is responsible for the oversight and elimination of the purchasing of duplicate or unnecessary items. 2 CFR 200.318(d). The reviewing official must be identified in the SFA's procurement plan.
14. Maintenance of Records: The SFA or designee will sign on the evaluation criterion score sheet of competitive proposals signifying the review and approval of the selection(s). The SFA must maintain records to detail the full history of procurement and contract performance and management. These will include but are not limited to the following: rationale for procurement method, selection of contract type, contractor selection or rejection, and the basis for the contract price.
15. Additional Considerations: School Nutrition bids will be presented to the Board of Education for approval, if applicable.

D. NON-COMPETITIVE PROCUREMENT METHOD (2 CFR 200.320(c)):

Whenever possible, items which are available only from a *Single Source* will be avoided. Single source procurement will only be used when it has been proven there is no competition. A sole response does not meet this standard. A vendor's statement or literature stating their company is



the only source will not be accepted. All claims to a single source will be vetted by issuing a competitive solicitation first.

Use of non-competitive procurements will be assessed annually and only be utilized when there are specific circumstances in which the recipient or sub recipient may use a noncompetitive procurement method.

The noncompetitive procurement method may only be used if one of the following circumstances applies:

- (1) The aggregate amount of the procurement transaction does not exceed the micro-purchase threshold;
- (2) The procurement transaction can only be fulfilled by a single source;
- (3) The public exigency or emergency for the requirement will not permit a delay resulting from providing public notice of a competitive solicitation;
- (4) The recipient or sub recipient requests in writing to use a noncompetitive procurement method, and the Federal agency or pass-through entity provides written approval; or
- (5) After soliciting several sources, competition is determined inadequate. If it is determined the non-competitive procurement method will be used, the SFA or designee must do its due diligence with the provider to get the best price possible. Before moving forward, the SFA will discuss the situation with the state agency. The SFA or designee will be responsible for the documentation of records to fully explain the decision to use non-competitive procurement. The records will be maintained and available for audit and review. The Superintendent or his designee will be responsible for reviewing the procedures to be certain all state and local Board of Education requirements for using non-competitive procurements are met.

1. EMERGENCY PROCUREMENT:

Emergency procurement is used in the rare event when there is not enough time or a short period of time to allow for proper procurement. Documentation will be collected and maintained.

If it is necessary to make an emergency purchase in order to continue service, the purchase shall be made and documentation of all such purchases shall be maintained, by the SFA, for review and audit purposes. This emergency procedure is used when there is a short period of time to allow proper procurement. Emergencies include unforeseen events. Lack of planning is not an emergency.

Documentation of emergency purchases shall be maintained and include:

- a. Item Name
- b. Dollar Amount
- c. Vendor
- d. Reason for Emergency
- e. Person authorizing or making purchase

In case of public health emergencies, the SFA will watch for guidance and potential waivers from USDA to adjust operations during this event.



ADDITIONAL PROCUREMENT OPTIONS AND FACTORS:

A. THIRD-PARTY ENTITY:

When using a Third-Party Entity, such as a group purchasing organization (GPO), non-Child Nutrition Program entity, or statewide contracts (not vetted by the Georgia Department of Education (GaDOE) School Nutrition Program), Southwest Georgia STEM Charter School Nutrition Program will use the Group Purchasing Entity's pricing as one source when soliciting price/rate quotes per 2 CFR 200.320 and USDA Memo SP 05-2017 unless full compliance with USDA School Nutrition requirements can be determined. The SFA must include local procedures to be followed when participating in cooperative agreements, buying groups, or statewide government contracts within the SFA's Procurement Plan. All documentation of the procurement process must be maintained locally in school nutrition program records. The SFA will utilize state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. (2 CFR 200.318(e)) When applicable, this will be noted in the SFA's procurement plan.

The SFA will utilize state and local intergovernmental agreements or inter-entity agreements where appropriate for procurement or use of common or shared goods and services. (2 CFR 200.318(e), when applicable.

B. SCHOOL NUTRITION COOPERATIVES:

The Southwest Georgia STEM Charter School Nutrition Program will utilize collaborative efforts for procurement in order to encourage competitive pricing and increase buying power through a school nutrition cooperative. The SFA will participate in cooperative agreement procurement with any local school in the surrounding area. The SFA will acquire and maintain all associated procurement documentation and communication. The SFA may enter a cooperative agreement for any good or service that is frequently used in high quantity deemed by the Superintendent.

C. PIGGYBACKING:

The Southwest Georgia STEM Charter School Nutrition Program may choose to piggyback onto a solicitation for goods/services under the same terms, costs, and conditions. Southwest Georgia STEM Charter School will be included as a participant on the original solicitation or ensure that the solicitation and contract include language for the addition of parties and specifies applicable limits without causing a material change. All documentation will be acquired and maintained for the length of the contract plus five years. The contract will be monitored to ensure compliance. Southwest Georgia STEM Charter School may choose to enter into a piggybacking agreement with any surrounding school that is approved by the school Superintendent. Any operational good or service may be included in the agreement.

D. MARKET BASKET ANALYSIS:



The Southwest Georgia STEM Charter School Nutrition Program will use market basket analysis to award contracts based on an evaluation of the lowest price a vendor can offer for a representative of no more than 10% of goods the program operator wishes to obtain.

E. FOOD SERVICE MANAGEMENT COMPANY (FSMC):

The Southwest Georgia STEM Charter School Nutrition Program will comply with existing Federal, State and local procurement requirements when obtaining the services of an FSMC.

The School may contract with a Food Service Management Company (FSMC), to manage any aspect of the school food service program. A FSMC is defined as a commercial enterprise or a nonprofit organization that is contracted by the SFA. The SFA must comply with existing Federal, State, and local procurement requirements when obtaining the services of an FSMC. Federal procurement standards are found in the Code of Federal Regulation (CFR) at 7 CFR 210.16. In contracting with a FSMC, the SFA must use competitive procurement procedures, solicitation, and contract documents that include required provisions in compliance with Federal, State, and local procurement regulations. 7 CFR 210.21, 7 CFR 250, 2 CFR 200.318-327, cost principles in the 2 CFR 200.400 series, and contract provisions in Appendix II to 2 CFR Part 200. The FSMC may be solicited through any formal procurement method.

The SFA will use any approved procurement method that best suits the cost of the purchase. The Superintendent will be the designee responsible for the decision. The School Nutrition Director will be responsible for contract monitoring and maintaining signed and dated documentation.

F. PROCESSING:

The Southwest Georgia STEM Charter School Nutrition Program will comply with existing Federal, State and local procurement requirements when procuring a Processor to convert raw, bulk USDA foods into ready-to-use end products.

The SFA will use any approved procurement method that best suits the cost of the purchase. The Superintendent will be the designee responsible for the decision. The School Nutrition Director will be responsible for contract monitoring and maintaining signed and dated documentation.

G. DISCOUNTS, REBATES AND CREDITS:

The Southwest Georgia STEM Charter School Nutrition Program will ensure discounts, rebates, and other applicable credits are applied. Discounts, rebates, and credits will be clearly identified on invoices submitted for payment monthly. Documentation will include the reason or explanation for any applied credit.

Records will be maintained that identify unallowable costs. The supplier must identify the amount of each discount, rebate, and other applicable credit on invoices and billing documents submitted to the SFA for payment. The supplier must also identify the reason or explanation of the applied credit. The supplier should report discounts, rebates, and credits monthly. With State Agency approval, the SFA may allow the supplier to report discounts, rebates and credits less frequently, but no less than annually. The supplier must identify the method to be used to report



any discounts, rebates, and applicable credits allocable to the contract that are not reported prior to the conclusion of the contract. And, the supplier must maintain documentation of all costs and discounts, rebates, and credits and furnish this documentation upon request to the SFA, the State Agency, or USDA.

The SFA will identify any preferred procedures for how the supplier should submit invoices/billing documents, frequency for receipt of report of discounts, rebates, and applicable credits in Procurement Plan.

H. BUY AMERICAN PROVISION: (7 CFR 210.21 (d))

The Southwest Georgia STEM Charter School Nutrition Program will exhaust every effort to comply with the Buy American Provision (food purchases only). Documentation must be received that (1) requests consideration on the use of domestic alternative foods before approving an exception (2) the use of a non-domestic food exception when competition reveals the cost of domestic food is significantly higher than non-domestic food and (3) The product is listed on the Federal Acquisitions Regulations Nonavailable articles list found at 48 CFR 25.104 and/or is not produced or manufactured in the U.S. in sufficient and reasonably available quantities of a satisfactory quality;

When receiving bids or proposals from vendors, if a product is available as both domestic and non-domestic, prices for both products will be obtained and the SFA will determine if it is fiscally sensible to purchase the domestic product. Records will be maintained to support the domestic vs. non-domestic decision. Any verification documentation received from the vendor will be verified through a neutral third party (such as the USDA Agricultural Marketing Service's (AMS) Market News Report).

All School nutrition staff will be trained to document these purchases. The documentation will include justification of the expense. The percentage of non-domestic purchases will be calculated on every form to monitor that the amount purchased remains below 5% of the total purchased foods. These forms will be signed by the SFN Manager and stored.

I. CONTRACTING WITH SMALL, MINORITY, AND WOMEN'S BUSINESSES:

Positive efforts will be made to utilize small businesses, women, minority-owned business sources, labor surplus area firms and veteran-owned businesses giving them the maximum feasible opportunity to compete.

All bids will be considered under the same bid tabulation criteria and have the same opportunity to be chosen as a bid supplier.

Positive efforts include:

- 1.Placing qualified small and minority businesses, labor surplus area firms, women's business enterprises and veteran-owned businesses on solicitation lists;
2. Assuring that small and minority businesses, women's business enterprises, labor surplus area firms, and veteran-owned businesses are solicited whenever they are potential sources;



3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, women's business enterprises, labor surplus area firms, and veteran-owned businesses;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, women's business enterprises, labor surplus area firms and veteran-owned businesses;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. If the prime contractor utilizes subcontracts, the SFA will ensure they take the affirmative steps listed above.

J. CODE OF CONDUCT:

In compliance with the stated regulations and in order to prohibit any potential conflict of interest, the maintenance of ethical conduct will be expected of all persons who are engaged in the selection, award, and administration of contracts supported by School Nutrition Funds.

The following conduct will be expected of all persons who are engaged in the award and administration of contracts supported by School Nutrition Program Funds:

- a. No employee, office or agent of the **Southwest Georgia STEM Charter School** Nutrition Program shall participate in the selection or award or administration of a contract supported by program funds if a conflict of interest, real or apparent, would be involved.
- b. Conflicts of interest arise when one of the following has a financial or other interest in the firm selected for the award:
 1. The employee, officer or agent
 2. Any member of his/her immediate family
 3. His/her partner
 4. An organization which employs or is about to employ one of the above.
- c. The Southwest Georgia STEM Charter School Nutrition Program employees, officers, or agents shall neither solicit nor accept gratuities, favors, or anything of substantial or monetary value from contractors, potential contractors, or parties to sub agreements. However, the SFA may set standards for situations in which the financial interest is not substantial, or the gift is an unsolicited item of nominal value.
- d. The purchase during the school day of any food or service from a contractor for individual use is prohibited.
- e. The removal of any food, supplies, equipment, or school property, such as records, recipe books and the like are prohibited.



- f. The outside sale of such items as used oil, empty cans and the like will be sold by contract between Southwest Georgia STEM Charter School Nutrition Program and an outside agency. However, the profit attained from such sales will accrue back to the non-profit school food service account.
- g. An individual sale by any school personnel to an outside agency or other school person is prohibited.
- h. Failure of any employee to abide by the above stated code will result in appropriate disciplinary actions such as reprimand, fines, suspension, or termination as outlined in the district policy on violations on such standards. Interpretation of the code will be given at any time by contacting the School Nutrition Program Director at (229-485-5464).
- i. The Southwest Georgia STEM Charter School Nutrition Program will not be responsible for any other explanation or interpretation, which anyone presumes to make on behalf of the Board of Education.

K. REVIEW OF TRANSACTIONS:

The Southwest Georgia STEM Charter School Board of Education agrees that the reviewing official of each transaction, Superintendent or his designee, is responsible for the oversight and elimination of the purchasing of duplicate or unnecessary items (2 CFR 200.318(d)).

L. TRAINING:

Basic procurement training will occur for all school nutrition professionals on an annual basis. The School Nutrition Manager will record and maintain supporting documentation of all training for each school nutrition employee, such as a list of training methods, dates, agendas, signed rosters and training topics. Procurement training topics for school nutrition professionals may include but are not limited to:

- Code of Conduct
- Product specifications and expectations upon delivery and storage Document provided by the Georgia Department of Education School Nutrition Division
- Buy American Provision and expectations upon delivery
- Inventory Control and Management • Forecasting
- USDA DoD (Department of Defense) Fresh program and ordering through FFAVORS (Fresh Fruit and Vegetable Order Receipt System)
- Conflict Resolution

Ensure that staff responsible for procurement are also trained on:

- Procurement reviews
- Evaluating bids
- Purchasing cooperatively (through SFA co-ops or group purchasing/buying organizations)
- Piggybacking



Refer to 7 CFR 235.11(g) and SP 05-2020 for more information

M. PROCUREMENT METHODS TIMELINE:

A Procurement Methods timeline will identify each category of goods or services forecasted to be procured for the year and the anticipated acquisition frequency, procurement method, and monitoring frequency for each corresponding category.

N. CAPITAL EQUIPMENT PURCHASES:

In accordance with 2 CFR 200.1, the SFA will request state agency (SA) approval for any capital equipment purchases (\$10,000 or more) that is NOT listed on the Pre-Approved Capital Equipment list. Any required approval must be submitted to the SA through the completion of the Capital Expenditures Pre-Approval Request form. See Attachment G for the pre-approval request form. All documentation, including pre-approval and procurement, must be maintained for five years plus the current year.