



West Virginia DEPARTMENT OF  
**EDUCATION**

# Office of Child Nutrition

Child Nutrition Updates

# New Federal Procurement Thresholds

- Micro Purchase – 0-10,000
  - Small Purchase – 10,001-250,000
  - Formal Purchase – over 250,000
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- With the increase in each of these thresholds, WVDE Purchasing Policy 8200 is now more strict in every area.
  - SFA's must adhere to the most restrictive guidelines whether Federal, State, or Local.

# Federal Procurement Requirements

- Written Code of Conduct
  - Code of Conduct must:
    - Contain language that prohibits real, or apparent conflicts of interest for employees engaged in selection, award, and administration of contracts.
    - Prohibit the acceptance of gratuities or favors from contractors.
    - Provide for disciplinary actions for violations.
- Written Procurement Procedures
  - SFAs are required by regulation to maintain documented procurement procedures.
  - Procurement Procedures should provide the specific roadmap for how the SFA is conducting procurement in compliance with regulations.
  - Policy 8200 is your written procurement procedures.

# Group Purchasing Organizations (GPO)

- GPO fee's are allowable under Federal Regulations, but procurement thresholds still apply.
- Joining a GPO **does not** take the place of competitive bidding.
- A GPO's pricing list counts as a bid and can be compared to other bids received during the competitive bidding process.
- If a County has paid a GPO's fee, and has their pricing list, the GPO does not have to submit a bid response. The County can simply compare the received bids to the GPO price list.

# Procurement Review Process

- OCN is completing the reviews at the same time, as your normal Child Nutrition Administrative Review.
- Obtain a detailed transaction list by vendor for the entire school year.
  - Kim Harvey created a query that pulls the information from WVEIS.
  - OCN is getting this information straight from Kim.
- OCN formats and sorts the transaction list and enters the information into the USDA Procurement Tool.
- The Vendor Table of the tool is sent to the Food Service Director to review and answer questions related to the small purchase and formal procurement transactions.
- OCN selects vendors for review from each category (micro-purchase, small purchase, and Formal) based on criteria built into the review tool.
- Invoices and all documentation related to small purchases and formal procurements are requested. Food Service Directors can scan and email, when possible, or the documents can be viewed onsite during the AR. Documentation can also be scanned and emailed to OCN staff.

# Child Nutrition Recording

- 88Y1X – Regular Term
  - All transactions related to breakfast, lunch and Snack
  - This includes any NSLP/SBP staff training costs.
  - Any Child Nutrition Grants that relate to those programs.
    - OCN State Aid
    - Federal Equipment Grants
- 88Y2X – Summer Term
  - All transactions related to summer feeding sites.
- 88Y5X – Child and Adult Care Food Program (CACFP)
  - Suppers and CACFP At-Risk Snack transactions.
- 88Y7X – Donated Foods Program
  - Fair Value adjustment for USDA Donated Foods.
  - Any transportation, processing, etc. cost associated with Donated Foods will go to the 88Y1X Project.

# Child Nutrition Recording

- 88Y8X – Fresh Fruit and Vegetables Program
  - FFVP is separate from the NSLP and SBP program.
  - Only elementary schools over 50% need qualify.
  - \$50 per enrolled student in qualifying schools.
  - Not all schools over 50% needy will get funding.
  - Food, labor, and supplies costs related to FFVP goes in this project.
- 88Y9X – Other
  - All transactions not related to any of the programs above will go here.
  - All grants for Backpack/non-traditional feeding type programs will go here.

# CACFP Recording

- If you serve Suppers/At-Risk Snacks, it is good if you can separate the actual expenses for Food/Supplies/Labor so that they can be recorded in the appropriate project.
- In many instances, expenses for CACFP meals are not separated and get charged to the Regular Term project code.
- If CACFP expenses are not separated, the Revenue for those meals should still be recorded to the 88Y5X project.
- Either during the year, or at the end of the year, expenses should be moved from the 88Y1X project to the 88Y5X project to zero out 88Y5X.
- While this method may not capture all of the CACFP costs, it will at least move the majority and allow us to calculate a more accurate cost per meal for the Breakfast and Lunch programs.



# Questions??

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