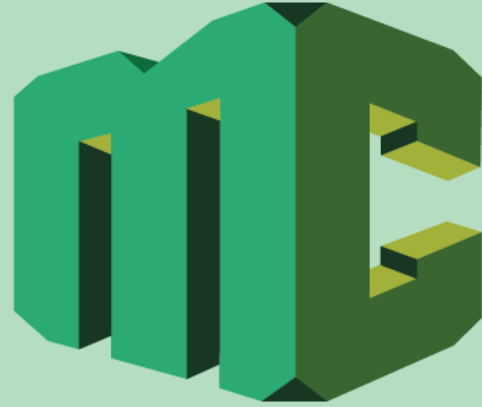


# Thresholds & Tactics: School Nutrition Purchasing in 2026



TEXAS DEPARTMENT OF AGRICULTURE  
**COMMISSIONER SID MILLER**



**Stephanie Robinson, MBA**

TDA Administrator for  
Business Management

# Meet our Speaker!



**Stephanie Robinson, MBA**

TDA Administrator for  
Business Management



# TDA Food & Nutrition Business Management Office

What We Do



# Resources & Questions





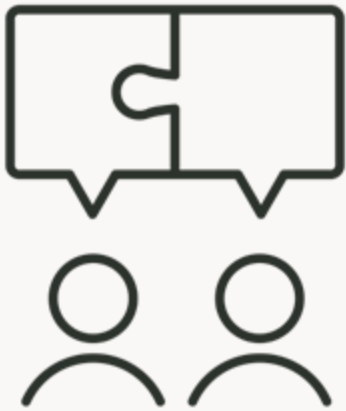
# Acknowledgement Statement

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## **You understand and acknowledge that:**

- The training you are about to take does not cover the entire scope of the program; and that
- You are responsible for knowing and understanding all handbooks, manuals, alerts, notices, and guidance, as well as any other forms of communication that provide further guidance, clarification, or instruction on operating the program.

# Why Does This Matter?



Communication



Collaboration



Compliance



# Overview

Bridging The Language

Bridging Procurement Processes

Procurement Scenarios

Resources and Q&A



# Bridging Terms

*Between Departments*

Child  
Nutrition



Business  
Management



# Procurement Terms:

## Non-Competitive Procurement



Sole Source Procurement



Emergency Procurement



# Bridging Terms

*Between Departments*








# Top Procurement Review Finding

Procurement Procedures



# Let's Take A Closer Look

	<b>Not Available</b>
	<b>Available, but...</b> <ul style="list-style-type: none"><li>• Lack Required Elements</li><li>• Not Aligned to 2 CFR 200.318(a)</li><li>• Are Not Followed</li></ul>
	<b>Combination</b>



## True or False?

Procedures for non-competitive procurement should NOT be included in overall procurement procedures.

**False**



What factors should be considered when planning to procure a good or service?



Take caution when  
using price as the main  
determining factor.





# Strategic Factors to Consider



Type of purchase



Frequency



Estimated total costs



Forecasting



# New Threshold Updates

**\*Micro Purchases = \$15,000 or less**

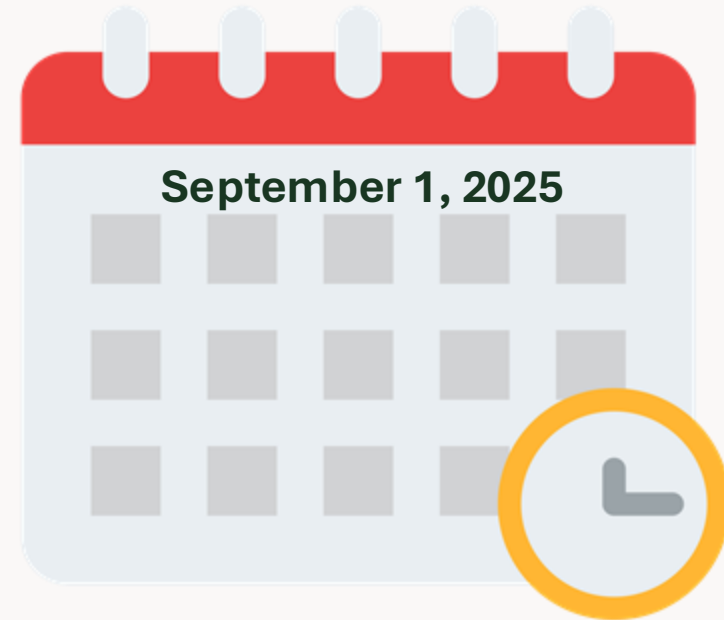
**\*Small Purchases = \$15,000.01- \$99,999.99**

Formal Procurement = \$100,000 or greater



# What does this mean?

- Not retroactive
- Applicable to School  
Year 2026-2027  
Procurement Reviews





Ready to test your procurement  
decision-making skills?



# Scenario #1:

The Child Nutrition Department's IFB or RFP solicitation received one bid.

**Option A:** Submit a sole-source procurement request to TDA.

**Option B:** Do not submit a sole source procurement request to TDA.

**Option C:** Evaluate the solicitation and do not submit a sole source procurement request to TDA.



# Evaluation of the Solicitation



Was language too restrictive?



Was the advertisement appropriate?



# Records Support Determinations

If it's not  
documented, it  
did not happen.





## Scenario #2

The Child Nutrition Department's point of service software requires the annual license renewal contract to be paid a few weeks before the start of a new school year. The amount of the purchase is more than \$15,000. You review the current contract's terms and conditions and learn that the software is proprietary.

**Option A:** Submit an emergency procurement approval request to TDA.

**Option B:** Submit a sole source procurement approval request to TDA.



# Scenario #2 Continued:

What if the purchase amount was less than \$15,000?

No need to request sole source procurement approval, as quotes or bids are not needed for a micro-purchase.



# Scenario #3

The Child Nutrition Department plans to sell nutritionally compliant à la carte pizza at the snack bar during the operation of the National School Lunch Program. The menu planner contacts vendors in the area asking if they offer a specific brand name type of pizza.

Using a brand name is proprietary to one vendor.



# How Could This Be Prevented?



Source quotes that identify specifications focused on nutritional value.



# Available TDA Forms

Small Purchase Log



Micro Purchase Log





## Scenario #4

“When using the micro-purchase method, we know we need to ‘spread the wealth.’ We already know that one vendor carries the product, and we have documentation to prove that the product is proprietary to the specific vendor. Should we submit a sole source procurement request for safe measures, so we do not have an issue with not ‘spreading the wealth’ when using the micro-purchase method?”

Does the SFA need to submit a sole source procurement approval request?

No



## Scenario #5

“We determined that the micro purchase method was the most appropriate procurement method for a one-time purchase item. We submitted a sole source procurement request just in case.”

Is submitting a sole source procurement request needed in this case?

No



# When an emergency arises...





# Consider the Formal Procurement Method



Tailor IFB or RFPs  
to Expectations



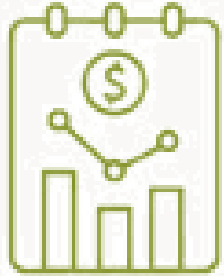
Quotes are Not  
Required



More Competitive  
Process



# What about Equipment and Parts?



Escalation/Price Adjustment Clause



Collaborate with legal team



# Contract Language Considerations:

Does the escalation clause language meet the need of the good or service?

Does it put the district at risk?

Is it enforceable without infringing on rights?





# Solicitations and Contracts

Each district has different needs.





# Approved or Not Approved?

Let's Practice!





# Scenario #6

The Child Nutrition Department utilized a vendor that was awarded a vended meal contract via the RFP process. The SFA requests a 30-day termination for cause as the vendor is not complying with contract obligations, and meals are not compliant.

Approved for emergency procurement



# Scenario #7

The Child Nutrition Department requested an emergency procurement approval for a dish machine rental agreement under \$15,000.

Not approved for emergency procurement



# Scenario #8

The Child Nutrition Department requested emergency procurement approval for a convection steamer in the amount of \$20,000. The SFA obtained three quotes.

Not approved for emergency procurement



Is a capital expenditure a procurement method?





SFA Submits  
Capital  
Expenditure  
Request

State Agency  
Reviews Request

State Agency  
Notifies SFA of  
Determination



How do you determine what documentation is needed for the capital expenditure request?



# Documents Required for Capital Expenditure Request

## Cost Analysis

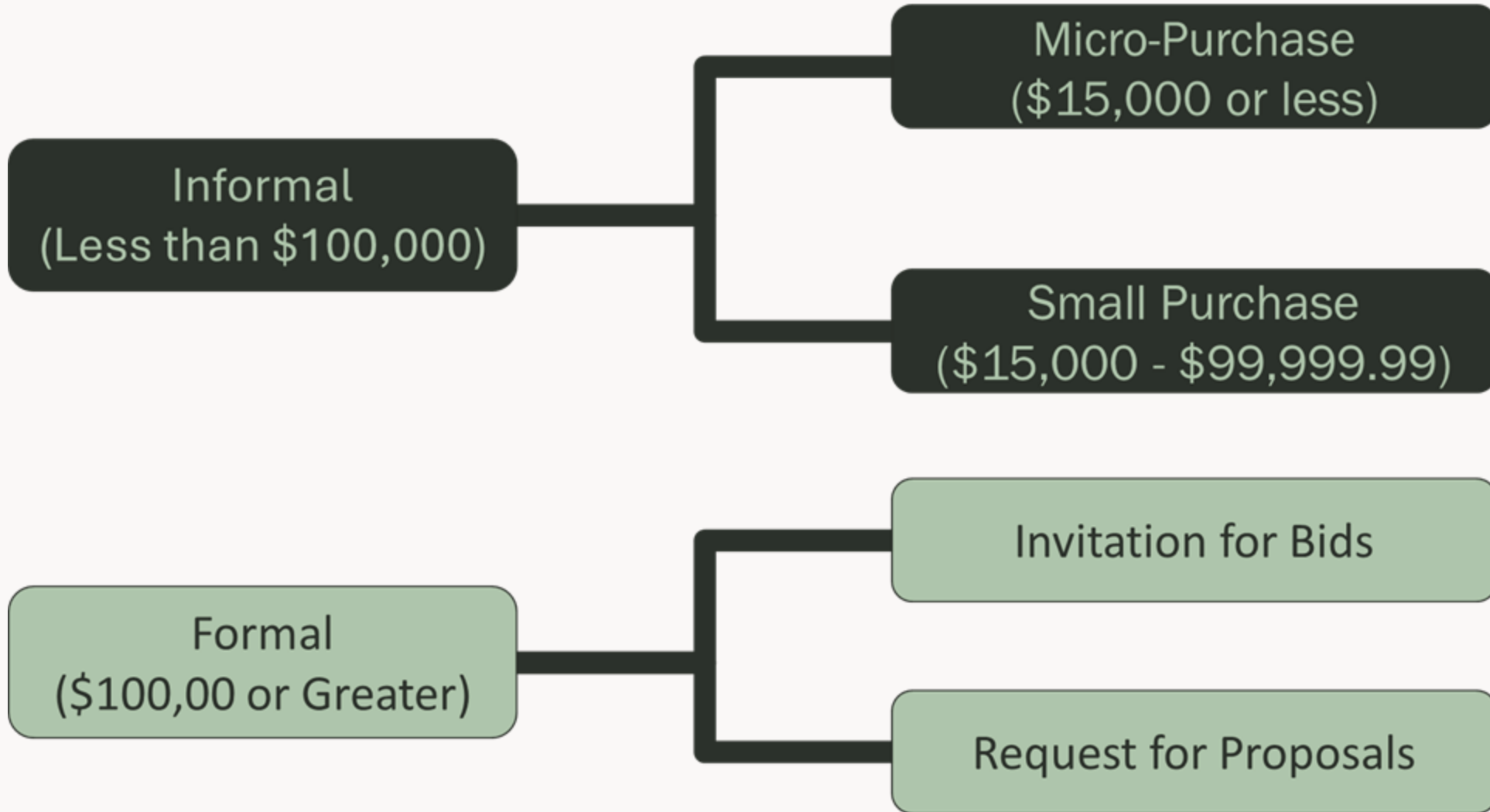
- Estimates cost of expense
- Includes itemized list of equipment, parts, installation, delivery & setup costs
- Supports procurement method

## Cost Allocation

- Explanation of use
- Methodology used to determine CNP's fair share



How do you determine what documentation is needed at the time of the Administrative Review?





“Clarify the number of quotes required for small purchases.”

## Best Practice

- Obtain at least three quotes

## Required

- Minimum of two price quotes required



“Clarify the documentation required for IFBs/RFPs.”

Solicitation

Cost Analysis

Public Advertisements

Vendor Offers

Evaluation of Bids/Offers

Award to Most Responsive & Responsible Vendor



“Clarify  
procurement  
practices using  
GPOs.”

## Micro-Purchase

- Allowable if purchase amount is equal to or less than micro-purchase threshold & micro-purchase requirements met.

## Small Purchase

- May consider the price from GPO as one source of pricing.

## Formal Procurement

- GPO meets all formal procurement requirements, then SFA may consider line-item GPO awards.
- GPO does not meet all formal procurement requirements, SFA may only consider GPO as a source of information but not as a source of pricing.



# Resources



General Procurement  
FAQs on  
Squaremeals.org





# Questions



Leave Us Your  
Feedback!



# Contact Us



(877) TEX MEAL  
(877) (839-6325)



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1. mail:

U.S. Department of Agriculture  
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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](mailto:program.intake@usda.gov)

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