



Thresholds & Tactics:

School Nutrition Purchasing in 2026



TEXAS DEPARTMENT OF AGRICULTURE
COMMISSIONER SID MILLER

Fraud Hotline: 1-866-5-FRAUD-4 or 1-866-537-2834 | P.O. Box 12847 | Austin, TX 78711

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7/22/2026



Resources & Expectations

Acknowledgement Statement

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.



Stephanie Robinson, MBA

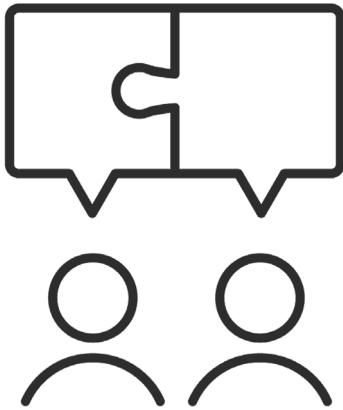
TDA Administrator for
Business Management



TDA Food & Nutrition Business Management

What We Do

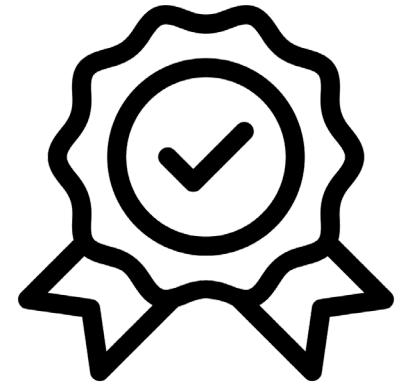
Why Does This Matter?



Communication



Collaboration



Compliance

Overview

Bridging The Language

Bridging Procurement Processes

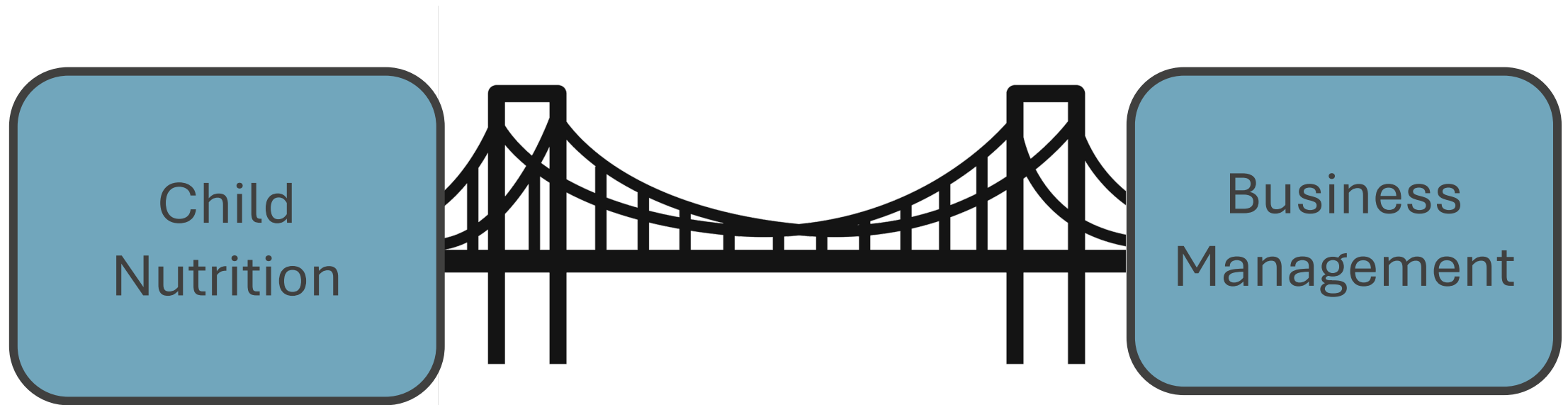
Procurement Scenarios

Resources and Q&A



Bridging Terms:

Between Departments



Procurement Terms:

Non-Competitive Procurement



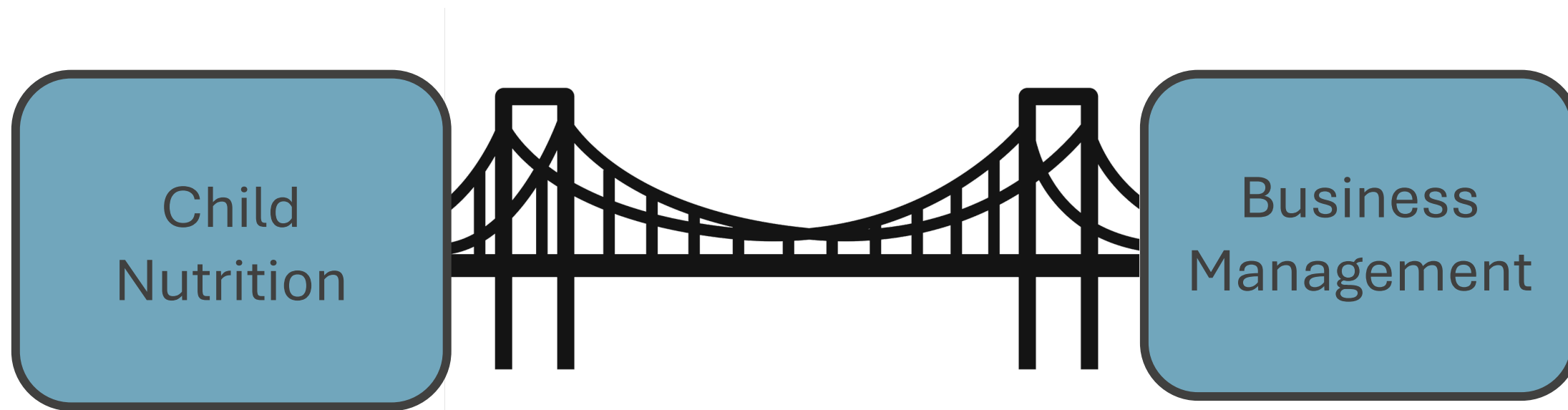
Sole Source Procurement



Emergency Procurement

Bridging Processes:

Between Departments



Top Procurement Review Finding

Procurement Procedures



Let's Take A Closer Look

	Not Available
	Available, but... • Lack Required Elements • Not Aligned to 2 CFR 200.318(a) • Are Not Followed
	Combination

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

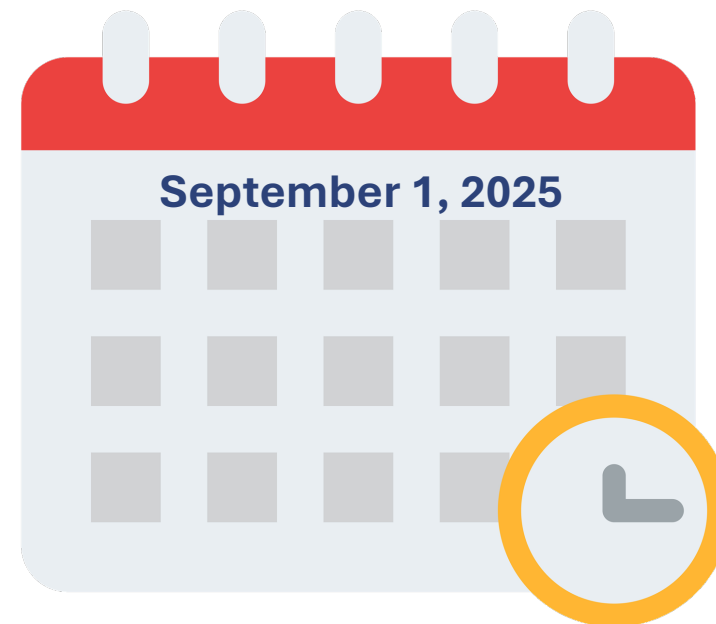
***Micro Purchases = \$15,000 or less**

***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.

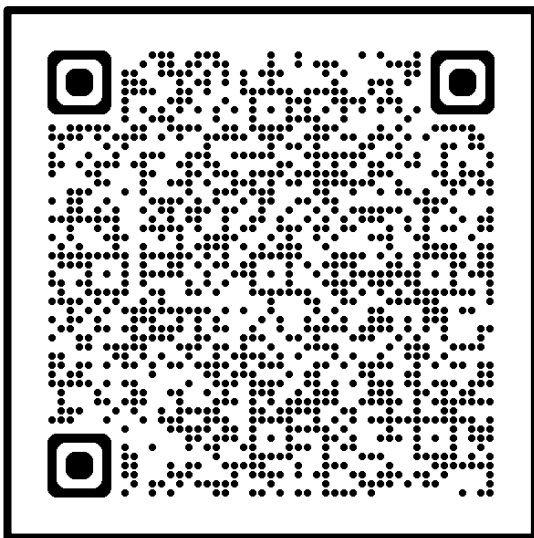
How Could This Be Prevented?



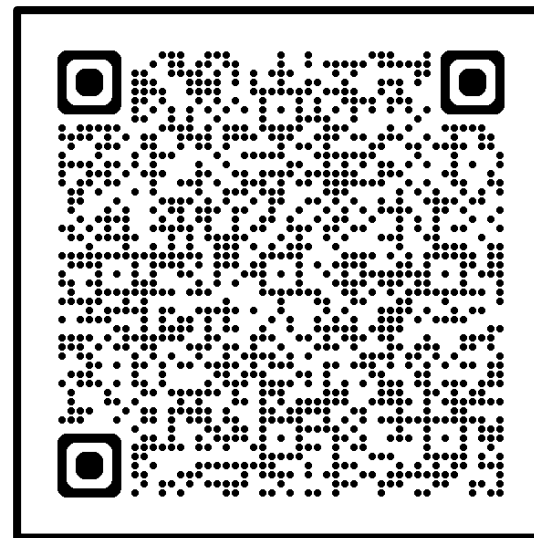
Source quotes that identify specifications focused on nutritional value.

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

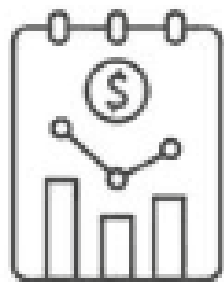


Quotes are Not
Required



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

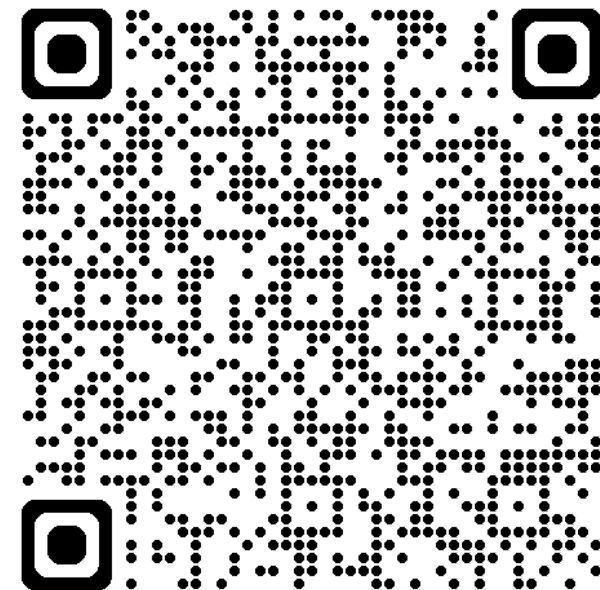
The Child Nutrition Department requested emergency procurement approval for a convection steamer in the amount of \$20,000. The SFA obtained three quotes.

Not approved for emergency procurement



Resources & Questions

General Procurement FAQs on Squaremeals.org



Questions?



Contact Us



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



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1. mail:

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2. fax:

(833) 256-1665 or (202) 690-7442; or

3. email:

program.intake@usda.gov

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