

Procurement Plan and Code of Conduct

Hawaii Child Nutrition Programs

October 2017

Today's Learning Objectives:

1. Review required elements of SFA Procurement Plan and Code of Conducts
2. Review Buy American Provision for Hawaii SFAs
3. Introduce Buy American Provision Documentation Worksheet

Professional Standards Met:

Purchasing – 2430

Employee will be able to purchase food, supplies, and equipment through vendors, meeting school district specifications in compliance with Federal, State and local procurement regulations and availability of USDA Foods.

What is a Procurement Plan?

A procurement plan is a detailed description of an SFA's procurement process that demonstrates that they procure in a manner that is consistent with federal, state, and local law and regulation.

Demonstrates that the procurement process allows for fair competition for all products.

Required for SFA's participation in USDA Child Nutrition Programs.

Written Procurement Procedures:

- Ensure purchases made are in compliance with federal, state, and local rules.
- Provide purchasing staff with a guide on proper procuring which will create a decrease in unallowable transactions.

HCNP Prototype Procurement Plan

Includes Code of Conduct.

All SFA's must have a written Code of Conduct.

- Protects employees from engaging in unethical and unallowable behavior
- Provides disciplinary actions for violations
- Protects SFA's reputation

Code of Conduct must have consequences if rules are violated

Examples of disciplinary actions are:

- Verbal warning
- Written warning
- Fines
- Suspension or Termination
- Police/Legal Action

Conflicts of Interest

No employee should be involved in the procurement process if they have a conflict of interest – real or perceived.

- *REAL: Professional judgment is compromised because of a financial personal benefit.*
- *PERCEIVED: A reasonable person would think that the professional's judgment is likely to be compromised.*
- *The Newspaper/Stink Test*

Can an SFA Receive Gifts?

Gratuities, Favors or Gifts

2 CFR 200.318 (c) (1)-Non Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.

Can a SFA Receive Gifts?

Yes, but it must be cleared defined in the SFA's Code of Conduct.

HCNP Prototype Procurement Plan

On HCNP Website under
NSLP>Procurement>Training>HCNP Procurement
Plan

Just fill out and you have a plan to take to your
School Board for approval.