

Sourcing Local Foods Understanding Procurement Transcript

Abby Harper: All right. Hello, everybody. And welcome to our webinar today -- Sourcing Local Food and Understanding Procurement Rules and Regulations. Before starting, I just want to take care of a few housekeeping tips. In order to fully participate in the webinar, you need to be connected both to Adobe Connect as well as via audio. The audio connection information is there in the chat box on the lower right-hand corner. And please keep your phone muted throughout the presentation so that the audio is clear. So if everyone can put their phone on mute. We'll be doing questions today through the chat box at the lower right corner. So if you have any questions throughout, you can just type them in there and we'll try to get to them as it's appropriate. If we don't get to any by the end of the webinar, we can follow-up with you. But we do have a lot of material to cover today in a short amount of time, so we'll hold most questions until the end. So to quickly introduce you to our presenters today, I am Abby Harper, the Farm to School Specialist at the Center for Regional Food Systems. And with me here, I have Aimee Happala who is a Financial Analyst at the Michigan Department of Education. You'll hear our voices the most today. Additionally, we have some other friends from the Department of Education joining us. Jaime Malnar, Melissa Lonsberry, and Adrienne Davenport will all share a presentation at the end relevant to their programs. We also have Gary Slate who's in the Midwest Office of the USDA Food and Nutrition Services. He'll be on hand at the end of the call to answer any questions that we may not be able to. And as a reminder, please do mute your phones if you're calling in just to make sure we don't get too much feedback. I can hear a couple people sneezing, so please make sure to mute your phones. So just to give you some background for why we're doing this webinar today, every year in September in accordance with our MI Farm to School Grant Program -- which if you're not familiar with, you can find out about on our mifarmtoschool.msu.edu webpage. So every year in September, we do a round of training. And this year in September, we touched briefly on procurement, but we recognized that there was still a lack of clarity and confusion on the subject of procuring local foods for Farm to School Programs. We also had the opportunity with the Michigan Department of Education to do an intent procurement training earlier this month. And so we wanted to capitalize on that opportunity to share with your guys some information. So there will be three goals for this webinar today. First is to understand how procurement regulations apply to local purchasing initiatives. The second is to identify strategies and tools for purchasing from Michigan and/or locally for your school and early childhood programs. And you will leave the webinar able to properly apply procurement procedures to your local purchasing. I do want to emphasize that this webinar is not covering the topics such as developing menus that incorporate local foods or how to start planning for a Farm to School Program. This webinar is meant to guide you through the technical aspects of the procurement process once you've decided to purchase local foods and identify some areas of your menu where you could incorporate local foods. If you're interested in learned more about those other



more planning aspects, I encourage you to check out some of the resources available at our website such as our Purchasing Michigan Products Guide and our Farm to Early Childhood Programs Guide. Those go much more in depth with some of those early steps of how to put products on your menu. And you can find all of those guides, as well as some other resources, at our mifarmtoschool.msu.edu webpage. And with that, I will pass it off to Aimee to talk about some procurement basics.

Aimee Happala: All right. Thank you, Abby. And good afternoon, everyone. First of all, I'd like to start off with why are we discussing procurement and the regulations. The main reason for such is that [inaudible] the sponsors are accountable for the [inaudible] of poor nutrition program funds. They're funded by the federal government, and the state and local officials that run these programs are accountable to taxpayers. These regulations are to be used by program operators to provide reasonable assurance that the best buy is obtained. And failure to conduct proper procurement procedures may lead to unreasonable costs which are not allowed in the School Nutrition Program. So with that background in mind, we're going to go forward and speak about principles of good procurement. The main components of the procurement are full and open competition, fairness and integrity, and responsive and responsible vendors. And we'll dig into each of these three more in depth now. Full and open competition means that everyone is on a level playing field and has the same opportunity to compete. If the playing field is leveled, vendor participation is encouraged, the cost of the product and services will be lower in price, better-quality products and services will result, and this ensures efficient use of federal funds. Procurement procedures may never unjustifiably restrict or limit competition. The second component of good procurement is responsive and responsible vendors. Responsive vendors conform to schools' stated terms and conditions. And a responsible vendor can and will successfully fulfill the terms and conditions of the proposed procurement. Now the third component of good procurement is fairness and integrity. Good practices of fairness and integrity include using the procurement process to obtain high-quality goods or services at the lowest possible price. Developing a solicitation that contains specifications that are clear and not unduly restrictive. Publicizing the solicitation appropriately to the widest possible audience to [inaudible] full and open competition. Writing clear evaluation criteria that are not unduly restrictive. Allowing adequate time for respondents to prepare responsive bids or proposals. Ensuring transparency in the opening and evaluating of bids and proposals, and documenting the entire process. Also, procuring within the awarded scope identified in the solicitation. And overall transparency throughout the entire process is key -- maintaining clear, forthright, and out and the open.

Abby Harper: And, folks, if everyone on the line can please press *6 to mute your phones. We're getting a little bit of background noise. It sounds like maybe someone [inaudible]. If you



could please press *6 to mute your phone, we'll all hear a lot better. Thank you so much.

Aimee Happala: We're now going to dig a little deeper into formal procurement. The formal procurement -- oh, I'm sorry.

Abby Harper: We're going to go over a couple preliminary steps in procuring local foods. So before you start the procurement strategy, there are a couple of preliminary thought steps that will help guide your procurement strategy. The first is to ask why are you purchasing local. What are your motivations for sourcing local? If you're at this step in the procurement process, you've likely already thought about why you want to support local foods. There are many aspects of purchasing local that you may prioritize, such as supporting local economies and local farmers, supporting alternative farming practices, promoting health and wellness, minimizing the environmental impact through shortening the distance through food travels. And many folks are interested in buying local to build educational opportunities, and for students to interact with food and agricultural and to build deeper community connections. So depending on your motivation for purchasing local food, your definition of local may vary. So in defining local, your school district or early childhood program -- there are a variety of ways to do so, and it may vary from program to program. You can define it by city, county, state, or geographic region. So, for example, if your goal in sourcing local is to build an educational opportunity, you may want to adopt a narrower definition of local to allow for transportation of students to farms, and vice versa. If your goal is to promote health and wellness and support alternative farming practices, perhaps your scope is a little bit bigger to get some of those farms in. The definition also could vary product-to-product as well. So, for example, in Michigan we grow a lot of dry beans in the [inaudible]. So if you're located in the [inaudible], you could have a narrow definition of local. But if you're elsewhere in the state where dry bean production is not as plentiful, you may need to widen your scope of local to more of a statewide level. And likewise, if you're a larger district that perhaps requires several thousand apples daily, your definition of local may need to be state or regional to get the quantities of apples that you need to supply your students. So thinking about your rationale for supporting local. And your situation may alter how you're defining local. I'm briefly going to talk about a couple methods for sourcing local. As I mentioned, we're not going to go into the details of each one of these today. We do have resources on our website available for those. But just to give you an idea of some areas that you could source local -- you could purchase directly from a producer. You could go to a farm or farmers' market to do so, or build a long-term relationship with the producer to supply food. You could purchase local product at produce auctions. You could purchase from a producer co-op or a food hub. For those of you on the line who may not be familiar with the term "food hub", they're typically regional aggregators and distributors. So, essentially, these are distributors with more limited geographic range. In Michigan, some examples are Cherry Capital Foods in Traverse City. Here in Lansing, we have the Allen Market Place. In Battle Creek, there's Sprout Urban Farms. And there are a number of others



throughout the state. You could also go to your food service management company or distributor, any distributor to Michigan product lines where they will denote where products are from. And some will even go down to the county level. And then you could also go through a school garden or farm. Could everyone make sure you press *6 to mute your phone? We're getting some feedback. If you have been on the line and have not muted your phone, please do so now. Please mute your phone by pressing *6. And if your phone number ends in 0445, that might be you. Please press *6 on your phone to mute. Thanks, everybody, for bearing with us. And lastly, you could go through a tool guide in our farm. We're doing a webinar in a few weeks on how to source locally from your school garden or farm. And more information on how to source some local products is available through our Michigan Farm to Institution Local Purchasing Campaign. Cultivatemichigan.org. Cultivate Michigan -- if you're not familiar with it -- they highlight products each year. So we do four featured products each year and we develop purchasing guides which can help you identify sources for some of the different products within Michigan. So far, we have guides for eight different products, including apples, dry beans, winter squash, milk, and many others. And we'll be having four new ones in this coming year. So in talking about procuring local foods today, we're going to go through some preliminary steps for procuring local. We're going to go through three different methods of purchasing -- so, formal, informal, and micro-purchasing procurement. We'll talk about some strategies to incorporate local purchasing and to each of these purchasing methods. And we'll give some real-world applications throughout, ending with some concrete examples from the Michigan Department of Education. And to highlight throughout, we're going to include a fictional school in Ganderville, Michigan. For the purposes of this activity, we're going to use them to allow us to sort of apply some of the principles we're talking about with a little bit of context. So in Ganderville, they started farm to school in 2015 doing some preliminary farmer visits, so they've established some connections with local farmers that are interested in working with the school. And they also have an Apple Crunch in 2015. For those of you not familiar with the Crunch, this is a one-day initiative throughout Michigan and the Great Lakes region to crunch into an apple. Last year, we had well over 300,000 participants, and we'll be doing it again in 2016. So after participating in these activities, they got really excited about farm to school. And now they've identified some products on their menu that they're going to try and source locally. So they're looking for ground beef, lettuce, and dry beans. And we'll come back to these three examples throughout the presentation. So I want to emphasize that the reason we're going through all of this today is because, in your procurement, "local" is not allowed to be used as a specification in your procedures. So when you're writing out a solicitation for an invitation for bid or a request for proposal, you are not allowed to insert language that says, "This solicitation is for apples or any products grown within a 50-mile radius of Ganderville, Michigan." That's because it's the same as limiting competition. So Aimee mentioned the importance of competition earlier. And using language that will prevent many folks from submitting a bid solely based on location is deemed as too restrictive to competition. So we have to find some other places in the bid where we can incorporate



language that will help ensure that we get local farmers applying, and prioritize certain characteristics that are more common of local farms. So there are five steps in the procurement process that are important. These are planning, drafting specifications, advertising a solicitation, awarding the contract, and managing the contract. And today, we're really going to be focusing primarily on the first two steps, which are planning and drafting specifications. These are the areas where we really have a chance to insert some local preference. And then we'll touch a little bit on the third step -- advertising a solicitation -- especially as it pertains to informal procurement. So one of the preliminary planning steps that's really important when starting to procure local foods is to make sure you're familiar with the availability of local products in your region and gain some knowledge about agriculture in your area. This is our Produce Availability Guide, which is available on our website. And this highlights the seasonality of different products in Michigan. This is really important because if you're in the middle of December and asking for a product that's only grown in the summer, then you're not going to get a lot of success in getting farmers to respond to your bid. Likewise, if you're doing harvest of the month in September but perhaps using the snap pea curriculum, snap peas don't grow in Michigan in September. So it's important to note those types of aspects about your local agriculture before starting through the procurement strategy. You'll save yourself a lot of headaches and make sure that what you're soliciting is actually available. And then a good initial step to do is putting out a request for information. This is not a formal solicitation, so you're not restricted to the rules around local language. So a request for information allows you to access the field and identify what products farmers in your area might be interested in providing to you. You can incorporate questions about prices, seasonality, food safety practices, and other characteristics to get an understanding of your area and identify what products might be successful for sourcing locally. This can diminish a lot of headaches later on when you send out a bid request for proposals for local products and don't receive any bids back because you didn't adequately survey your field. And additionally, conducting a request for information can get your foot in the door with local farmers and increase the likelihood that farmers will respond to bids. So farmers new to farm to school may not be looking for public requests or proposals, or may not know where to find them. So doing some intentional outreach through requests for information can start to build some of those relationships. So using our sample school, this is a request for information. They are seeking information from producers located within 100 miles from Ganderville, Michigan for the following products. As I mentioned, since it's a request for information, you are able to put the 100-mile local radius because you're not formally soliciting anything yet. So Ganderville would like to know about their three products -- ground beef, loose leaf lettuce, and dry beans. And they would like to know quantity, price range, and seasonality for these three products. You can also incorporate here language about any particular growing practices that you're interested in, any food safety questions that you have for farmers, and other sort of general farm questions. And so after your request for information, you're ready to go into the procurement process. And I will pass it to Aimee to talk about formal and informal



procurement.

Aimee Happala: Thanks, Abby. We're first going to talk about formal procurement. Formal procurement procedures are used to purchase when a single transaction cost exceeds the small purchase threshold set in Michigan of \$100,000 for public schools and ISDs. Schools and non-school institutions and/or sponsors must use a competitive process by issuing an invitation for bid, or IFB, or a request for proposal, RFP, for any procurement over the small purchase threshold for food. Both must be formally advertised and contain reasonable bid specifications. Now when you're thinking about that threshold of \$100,000, the threshold applies to your purchase. You must think about the total amount you need to purchase of a particular item. And any of the following apply when thinking about the total amount to purchase. Total dollar amount that you would spend from a vendor. The single purchase order of an item or items. The aggregate total of all invoices for a contract. The total of purchase orders from a single supplier. The aggregate total of all purchase orders. Purchases of a particular food item cannot be broken up to avoid using proper procurement procedures or to get lower than the formal procurement threshold of \$100,000. All procurements must be comprised of items that we discussed before -- full and open competition, buying American products whenever possible with fairness and integrity, and with responsive and responsible vendors. Formal procurement is done when the value of the purchase exceeds the federal, state, or local purchase thresholds for small purchases. It is more rigorous and prescriptive, and uses either the competitive field bidding method or competitive negotiation, RFP. Both methods allow for the identification of evaluation factors and their relative importance. Now here are the steps in the formal purchase method. Once a sponsor has forecasted its needs and made a determination regarding the proper procurement method to use, a solicitation must be developed which clearly conveys to the bidders what is being sought relevant to terms and conditions, and how responses will be evaluated and awarded. Now like we talked about, there are two types of formal procurements -- invitation for bid, or IFB, or request for proposal, or RFP. Invitation for bid is a competitive formal field bid method to obtain a price quote. With IFBs, complete specifications or descriptions of the product or services are used. Responsive bids do not differ other than price and more than one qualified source is willing and able to compete for the award. With RFPs, it's a competitive formal procurement method used to obtain a proposal that explains how the prospective vendor will meet the objective of the solicitation document and include the cost element that identifies the cost to accomplish the proposal. But the proposal is evaluated on price, product specification, service and deliveries, geographic preference, and the vendor's overall qualifications. Now to the important part. Developing a solicitation is a really important step in the procurement process as the solicitation document is used by sponsors to convey to the bidders what the sponsor's needs actually are. There are many aspects of a solicitation ranging from importance of clearly identifying the contract type and the IFB, which results in a fixed-price contract, or an RFP, resulting in a fixed-price or cost-reimbursable contract. The links of the contract clearly



outlining the scope, developing clear specification, estimated quantities, and identifying requirements for responsive and responsible bidders. Writing clear and thorough specifications includes identifying what is being purchased. Specifications may include the following. Product name, variety, grade, size, quantity, quality, cleanliness, packaging, delivery, food safety, farm practices and characteristics, and other requirements based on a product or service. Now formal procurement procedures must be advertised. Formal procedures allow for providing vendors with solicitation documents. But the solicitation notice must also be placed in the local, state, regional and national newspapers, and on your website. It is critical that sponsors provide the vendors with ample notice of the opportunity to compete, as well as enough time to respond. Now I will pass it over to Abby for more on how formal procurement applies to purchasing locally.

Abby Harper: Great. So, as Aimee mentioned, the small purchase threshold is what you will use to determine whether something is formal or informal procurement. And so even though the federal threshold is \$150,000, the Michigan threshold is \$100,000. And so, according to procurement rules, you must go by the more restrictive threshold. I also want to emphasize that, even on a local level, this can have a very different threshold. I was at a school recently whose small purchase threshold was \$5,000. Meaning that any purchase over \$5,000 had to be conducted by formal procurement. So it's important to make sure you know your regulations at the district level or in your program in order to make sure that you're using the appropriate threshold. So in formal procurement, there are really two places that you can insert criteria for local, and those are the solicitation and evaluating bidders. And we'll go over both of those now. So in this section, we're going to discuss how to incorporate local characteristics into your specifications and technical requirements. How to use geographic preference to award points to vendors that meet your definition of local. And lastly, how to apply evaluation criteria that can target local farmers. So in the solicitation, there are really five places where you can incorporate local language. You can incorporate it into the introduction and scope, into the description of goods and services, into timelines and procedures, technical requirements, and evaluation criteria. I'm going to talk a little bit about introduction and scope, but we're mainly going to focus on the description of goods and services, and then we'll come back to the evaluation criteria a little later. So in your solicitation, in the introduction and scope, is an opportunity for you to incorporate your program goals and priorities so that vendors are aware of what's important to you. So the introduction offers an opportunity to emphasize the importance of a school's interest in local products without making it a requirement that ensures that vendors are aware of your interest in local products, and may make an extra effort to inform you of any products they have available that meet your definition of local. I want to note that a district including its desire for local products in the introduction does not require bidders to supply local items. But it does indicate the district's interest in offering local items, and may influence how a vendor responds to the solicitation. I've included two examples here, one



which comes from a school in Michigan, and the other in reference to our fictionalized Ganderville. The first one is the district's priority is to purchase Michigan-grown products to the maximum extent practicable and appropriate. Vendors shall provide supporting documentation upon request of produce items grown within the state of Michigan's district. So it's not asking that vendors be required to provide Michigan products, but that they provide information about those that aren't Michigan, and it emphasizes that priority for the district. And similarly, a more vague example could be just incorporating that your school believes that feeding your students Michigan-grown foods supports student health and local economies. So even just highlighting that that's a priority for you may encourage more folks with local products to respond to your bid. And then as Aimee mentioned, there are areas in product specifications where you can incorporate local language. You could incorporate specifications about the freshness of the product, such as harvested within a certain time period. And local products talk about harvesting within 24 to 48 hours of delivery that ensures that your farmer is going to be a little bit closer in. You can specify the harvest technique. So requesting hand harvesting may favor local farmers. You can specify the level of crop diversity. So, many farms that are smaller may grow more diverse crops. The availability for education, such as fieldtrips and farmer visits. And you can also incorporate it into your production standards if you wanted to ask for organic practices or similar metrics. Again, none of these guarantee local, but they help increase the likelihood that some local folks will respond to your solicitation. So to give you a couple examples from our fictional Ganderville, for ground beef, they could include aspects such as grass-fed or hormone-free, which may favor some local farmers. Or a willingness to visit schools. So if a farmer is willing to visit schools, it's likely that they're a bit of an operation that has that flexibility and may be closer to your school. For lettuce, you can incorporate "harvested within 24 hours of delivery". Remember we talked about that freshness specification. That the farm grow at least 10 different crops, or that a farm must be able to provide fieldtrips for students to go to the farm. And then for dry beans, you can incorporate in all of these, too, if you know particular products that Michigan grows. For example, Michigan is a top producer in navy beans and black beans. So you can incorporate certain types of products that folks may grow more of. With apples, there are a lot of Michigan specific varieties that you can include as well that aren't necessarily grown in Washington or any other apple-producing states. You can incorporate things like "organic practices" and, again, the availability for a fieldtrip. There's a question coming in that's very relevant to this section, which is, "Can you require that vendors provide information where any and all products are from?" Yes, you can require that vendors provide origin labelling or origin information for all of their products. And this is another way that you may be able to target local products because a farmer knows where all their products come from, whereas the distributor that aggregates a lot may not be able to provide that specific information. And then also in the line of specifications, I want to just emphasize a couple areas that I've seen solicitations of including language that actually limit local farmers rather than encourages them. So one example in lettuce, I've seen the description for "washed three times". In some cases, if this is a requirement for your district



based on limited capacity to process food, that could be a valid description. But you may want to consider if rinsed lettuce is good enough. Many farmers, especially small farmers, may not have the capacity to thoroughly rinse or thoroughly wash product. So it's important to think about substitutions there. Likewise, I've seen solicitations for apples that required grade A. A lot of smaller farmers don't necessarily grade their apples and may not have a large enough crop to be able to give you that amount that you need in a particular grade. So it's worth considering if you'd be willing to substitute language about quantity per bushel. For example, if you know you need a certain number of apples, you can specify quantities in bushels to make sure that you still get that, even if they are slightly different in size. And another one I've seen recently is a request for grape tomatoes specifically that are red. And this was another area where you can just think about substitutions. If cherry tomatoes are a substitute for grape tomatoes, then you don't necessarily need to specify grape. And if you'd be willing to accept orange or yellow tomatoes, many small farmers grow diverse colors of products as well as varieties. And so thinking of ways that you can incorporate those substitutions can prevent limiting local farmers from responding to your solicitation. And then a couple other areas where I've noticed some folks including more farm-level specifications rather than particular product specifications. Good agricultural practices is a food safety standard. That's really great, but can be prohibited for small farmers because it is costly and it requires farmers to certify every product that they grow. So for small diversified farms that may grow anywhere from 30 to 100 different crops, it may be really difficult to get that certification. So it's worth thinking of alternatives to that that you may be willing to accept. The Michigan Farmers Safe Food Risk Assessment Program is a food safety program that requires farmers to go through similar steps to GAP but doesn't necessarily include the auditing component. That is prohibited for some farmers. Likewise, I've seen some solicitations that require certifications of farms. And it's worth noting that the Michigan Department of Agriculture and Rural Development does not certify farms in this way. So it's not recommended to include that requirement there if you are trying to get Michigan farms. And then also think about accepted requests or requirements on the part of the farmer if you're requiring personnel to be customer service relations specifically or high-liability insurance. Again, all of this is very much still thinking about not just knowing your farmer but also knowing your school, what is required for your school, and where might there be some wiggle room to allow for farmers that may not be able to meet some of those standards or some of those certifications. So I'm going to get into geographic preference now. And we'll spend a couple slides going over this. The 2008 Farm Bill allowed for geographic preference for the solicitation of unprocessed agricultural products. This allows schools and early childhood programs to give vendors within a specified geographic area a reasonable advantage. And with a lot of this terminology, it seems to imply some gray area. So what does a reasonable advantage mean? But it really all goes back to that concept of fairness and integrity, and of limiting competition. If you're implying an advantage, a huge advantage, to a farmer that's able to meet your geographic preference, it is likely not going to be seen as being fair and not having integrity. So it's just always good to come back to those key concepts that



we outlined at the beginning to think about whether or not your procurement procedures are fair and that you're operating with integrity. So think about what your intention behind it is. And, again, as with all other aspects of local, it must be outlined in your initial RFP, so getting back to that transparency. Schools can determine their definition of local. So you can outline what geographic area you will apply preference to. And this only applies to unprocessed agricultural products. So, unprocessed products may not be as limiting as you think it is. It allows for a fair bit of manual manipulation, such as peeling, slicing, dicing, cutting, chopping, shucking, and grinding. Also, some preservation techniques -- such as cooling and freezing, dehydrating, washing and packaging -- all of those constitute unprocessed products. In addition, preservatives are allowed if they are for the explicit purpose of preventing oxidation. And livestock and poultry can constitute unprocessed products as long as there aren't any additives. So as long as you have ground beef that is purely ground beef and not with any flavorings or spices in it, that counts as an unprocessed product. And pasteurized milk also counts as unprocessed. Geographic preference can be applied to all of these categories of food. So I'm going to go through three examples of geographic preference, and I'll spend a little bit of time talking about each one. The three examples we're going to go over are one penny equals one point, percentage local, and then tiered preference. And I also just want to emphasize it [inaudible] that whatever you're going to evaluate vendors based on must be stated in your RFP. So for the one penny, one point example, you're essentially applying a price point adjustment. And, again, you can determine how much, but it's important to not make it exceptive to a vendor that is able to meet your definition of local. So, here, we're working with Ganderville solicitation for lettuce. And they received bids from three farms -- Faraway Farms, Local Lettuce, and Global Greens. And remember that procurement rules state that you must award the bid to the bidder with the lowest price. So if we're just going based on price alone, you would award this bid to Faraway Farms because they have the cheapest price at \$1.97 per pound. So we would have to award this bid to Faraway Farms. But Ganderville has decided to apply a geographic preference to lettuce grown within 100 miles of Ganderville, Michigan. And they've stated that they will award 10 price points -- so that's actually 10 cents -- per pound to any farm that can meet that definition. So you can see here that the only farm that meets their definition of local is Local Lettuce. So they're awarded a preference price adjustment of 10 cents, which makes the cost \$1.95. And I want to emphasize that that is just the price that you're using to evaluate them on. This does not mean that you're paying a lower price for Local Lettuce. It basically is just a way to evaluate them on a different level so that you're able to give some preference to that local farm. So if we're looking at the price adjusted with preference point to evaluate these three farms, you would choose the Local Lettuce at \$1.95 per pound, but you'd still be paying \$2.05 per pound of your loose leaf lettuce. And it's really important when thinking about the weights that you're giving to different products to think about your school's capacity to actually pay a slightly higher price. If you are really restricted on cost, then it may not be advisable to do this because you are paying a slightly higher price for that product. So then the second example I want to walk through is percentage



local. So we'll use dry beans for Ganderville in this example. And so this could be a good once to use for dry beans because sometimes aggregators will combine products from different areas and may not be able to segregate exactly which is coming from where but may know overall in their purchasing where things come from. Additionally, some companies may have products available seasonally but not all year round. So a company may be able to provide tomatoes for 9 out of the 12 months of the year perhaps but not necessarily all year long. So in percentage local, you're awarding a price adjustment. So in this case, Ganderville has decided that their local definition is going to be grown in Michigan and that they're going to give a 10% price adjustment to any company that can guarantee that 75% or more of the crop is grown within the state of Michigan. So as you can see with the initial bids, we would be purchasing from Christina's Crops -- that's \$4,000 -- because they have the lowest price. However, when you factor in this geographic preference, you see that Larry's Legumes is the only vendor that's able to meet their percentage of in-state preference. And so they're able to provide 80% of their dry beans and guarantee that those are from Michigan. So they're awarded a 10% price adjustment, which is applied to their initial price. And then the new price that you'll be evaluating them on is that \$4,050. Now when you compare this new price with all the other vendors, Beany Distribution is not in the running, but Christina's Crops still ends up being the cheapest price even with the price adjusted with percentage preference. So in this case, you'd still choose Christina's Crops. And this is a case where geographic preference doesn't necessarily give you the most local bidder. And this is a great example of how geographic preference really only is a preference and not a guaranteed set-aside. So in this case, if you really wanted local products, you may need to incorporate some local specifications into other aspects of your solicitation that could encourage more local bidders to submit, and increasing the likelihood that you may be able to pick that vendor. So then the last one I'll go over is tiered preference. We're going to use the example of ground beef, which was the third product that Ganderville was looking at. So in tiered preference, it's very similar to the first example I gave of the one penny equals one point. However, it applies here to your definition of local. So, essentially, you have tier 1, which is a more narrow definition of local. And tier 2, which is a wider definition of local. Ganderville is using a 100-mile radius for tier 1, and within the state of Michigan for tier 2. And then you award price adjustments accordingly. So they award a slightly higher price adjustment for those who are able to meet their tier 1 definition, and a slightly lower 7% price adjustment, so it's still some preference to folks who are within the state. So as you can see with our three vendors in this one according to just price alone, one would have to purchase from Rusty's Ranch because they are the lowest priced. However, Michigan Meats is able to meet the 100-mile radius of Ganderville, Michigan, and so they get a 10% price preference adjustment. Bonnie's Beef is within the state, so they receive a 7% price adjustment. And then when evaluating based on these new prices, you are going to choose Michigan Meats so you get the most local at \$29,700. And remember, with all the other ones, you're still paying the contract price of \$33,000. So it really is just a way to evaluate the vendors a little bit differently, and doesn't necessarily ensure the lowest price that you will pay.



And I just want to include this one example that's not from Michigan but I thought was a really great incorporation of geographic preference. This was for a school in Kansas City, and they included in their RFP -- remember, everything needs to be stated very transparently and upfront in your RFP -- that produce stores from within 200 miles of the Kansas City area will be defined as local -- so they've defined their local-- and will be given 10 cents per pound preference in evaluation of the bid award. So they've outlined their definition of local. They've outlined what will be the geographic preference that will be given to them. And so, that way, they can proceed to use geographic preference in their evaluation criteria and everything is still up to procurement regulations. And then the last aspect where you could incorporate local language is in the evaluation criteria. So this allows you an opportunity to weigh certain factors or characteristics to give them a slight preference. But this is where it's really necessary to designate what is necessary versus what is a preference. If something is required or necessary, you would put it in the specifications. The evaluation criteria is where you can put a preference for things. So, as always, price should be weighted most heavily to encourage that full and open competition, and you can assign price points essentially for certain criteria. And I will walk through an example of that right now. So in this case, we're going for apples and we have three apple vendors -- Apple Grove, Aunt Ida's, and Fanny's Fruit. And you're going to award the highest price points to the vendor that is the cheapest -- so, giving favor to that vendor. So Apple Grove has the cheapest product, so they're awarded more price points. And then there are a host of other evaluation criteria. The three that really target local are at the bottom. The ability to provide farm and facility tour or classroom visits. So that's a preference for this school, and they'll award five extra points to any program that can meet that. The ability to provide state of origin on all products. They'll award another 5 points for that. And, again, Megan asked earlier about requiring vendors to provide information about where their products are from. This is an area where you can incorporate that. And then also delivered within 24 hours of harvest. We talked about the ability to include that as a specification, but you can also include it in your evaluation if it's just a preference. So even though on price alone you would be going with Apple Grove because they have the cheapest price, after you incorporate all of these evaluation criteria, Aunt Ida's Orchard actually gets 90 points. And so they would be the vendor that you chose for this, and they are able to meet some of those local criteria that we outlined. And I want to emphasize that we'll refresh back to these when we get to informal procurement because all of these can also be applied to the informal procurement strategy. And I'll let Aimee talk more about informal procurement now.

Aimee Happala: So now that we're switching gears to informal procurement, I just wanted to remind you that informal procurement is used when your purchase is valued under the small purchase threshold of \$100,000 in Michigan unless your area or school district has a more restrictive small purchase threshold. So while informal procurement methods are less rigorous than formal, it's important to note that all procurement methods require the need for written



documentation to include clear specifications. This is key to ensure that vendors are providing pricing based on the item you need and not what they have to offer you. Small purchases, those that exceed the micro-purchase threshold of \$3,500 which we will discuss a little bit later on, but less than \$100,000 formal purchase threshold require competition -- excuse me. Small purchases greater than the \$3,500 micro-purchase threshold and less than the \$100,000 formal purchase threshold require competition, which means quotes must be obtained for the products specified from at least three bidders. All procurement procedures require documentation of how the solicitation was conducted, the responses received, how responses were evaluated and awarded, and monitoring of contract performance. Informal methods allow the use of a vendor list that is current. When informal procedures are used, at least three quotes need to be requested. And so a good rule of thumb to think about is if at first you don't succeed, keep calling, emailing, and faxing until you at least have three quotes. However, if the item being purchased is not readily available for multiple vendors in your area of the state or in the state at all, document efforts made to obtain at least three quotes. Vendors need to be able to meet all their requirements you specify, just like informal procurement, and could include any delivery requirements, preparing, distributing services and whatnot that you want to make sure that you are doing business with responsive and responsible vendors. Now for informal procurement, you do not need to publicly advertise or announce accepting a bid. Though it's not public, you should have specifications in writing to make sure that you are saying the same thing to each of the vendors that you approach in effort of fairness and integrity. And in terms of informal procurement, you're going to award the contract to the lowest bidder that is both responsive and responsible. So now even though the process is not formal, it still needs to be competitive -- going back to full and open competition. Responsible vendors -- you want to look at their track record, references, history of past performance and whatnot. And now, Abby is going to tell you more about applying local purchasing in informal procurement.

Abby Harper: Great. So as we mentioned before, all of the things we outlined for formal procurement -- so incorporating local language into your specifications, into your evaluation criteria, and even geographic preference -- can be applied to informal procurement. But there's one particular reason why you may not need to do many of those. And that's because what Aimee mentioned -- the ability to identify and notify three sources eligible. So you do still need to draft those specifications, and you do need to evaluate bidders. But you can choose to target only local vendors. So to identify and notify three eligible sources, you can approach only vendors that meet your definition of local. And all that it requires is that you document your bids. So this can be going to farms and getting price quotes. It can be emailing. It can be calling. It can be going to farmers' markets to meet farmers there. But it just requires that you really have good documentation. And like Aimee highlighted, really keeping documentation of your process is really the best way to make sure that you're adhering to procurement



standards. Because if you can't find three vendors -- well, there are two things. One that's worth revisiting -- are you limiting competition unnecessarily? If you are looking for ground beef and you know that there is one farm within 100 miles of your school and you're limiting it to 100 miles, that might be limiting competition because there are no other farmers that even have the possibility of applying to that solicitation. So it's important to re-evaluate if you think that you might be limiting competition. But if you really are doing your due diligence to get three vendors and have documentation of the process you take to contact those vendors, then as long as you have the ability to back that up, that's fine. And so then to outline some areas where this could apply in Ganderville, Michigan outside of the three areas that we mentioned before, the first step would be to outline the specifications of their lettuce for example. So including some aspects of local characteristics in there. So the delivered within 24 hours of harvest is a good one to guarantee freshness and that farms won't be traveling from as far. And, again, in there is "rinsed" because we talked earlier about the potential restriction of including requirements for accepted washing. And then they would identify three farmers within 50 miles, which is what they've decided is their local definition for this purpose that grow lettuce. They could call those three farmers and tell them the quantity that they need, find out whether or not they're able to provide it to them and get price quotes. If those farmers aren't able to provide it to them, it's important to call more farmers and find out if there are others that can, and to make sure you're documenting the pricings from each farmer. But then you can really choose whichever farmer is cheapest within three that you selected. And now we'll go on to micro-purchasing.

Aimee Happala: OK. Thanks, Abby. New and exciting in the procurement world is the micro-purchasing threshold. It's a new method of informal procurement made available this schoolyear, the 2015/2016 schoolyear, and may be used for the procurement of food when the aggregate dollar amount does not exceed \$3,500. This space amount or threshold of \$3,500 was set as of October 1, 2015 and will be adjusted periodically for inflation. And those of us here at the Michigan Department of Education, we will be sending out policy updates typically in the fall and can inform you of any adjustments to that micro-purchase threshold. Now micro-purchases are intended to minimize the burden for very small purchases, and may be awarded without soliciting competitive quotation if the operator considers the price to be reasonable. And to the extent practicable, sponsors must distribute micro-purchases equitably among qualified suppliers. Now please note that the micro-purchase threshold may not be used in lieu of applicable procurement methods that may achieve a more economical approach. So it's important to know that sponsors may get a better price if they use another method that allows for more competition. And they certainly are not obligated to choose the micro-purchase method. But here are the steps of micro-purchasing. It's important to note again that distribution of purchases among equally-qualified suppliers is the way that you would go about that. And in general, just using honesty in the process and documentation of your steps will not



lead you into trouble. And then the next slide kind of highlights that the principles of good procurement apply to micro-purchases as well. If you use fairness and integrity in the process, operate with transparency and documentation to support your decisions, then it can be a very valuable and easy way to go about local purchases. And Abby will tell you more about that now.

Abby Harper: And I also want to emphasize I think we get a lot of questions about how you determine what is under those thresholds and how do you determine that aggregation of products. Micro-purchasing, as Aimee mentioned, is really meant to minimize the burden for very small purchases. So we use this term "arbitrarily splitting purchases" a lot. And it basically means that if you're splitting purchases for the sake of trying to get under these thresholds, then you're probably not going to be kosher with procurement regulations. So with the micro-purchasing threshold, it allows a lot of great opportunities for farm to school especially, and very much so for schools who may be new to farm to school and may just be trying out one or two products on a special event day. Micro-purchasing is a really great tool to use there. So you could use it for special events if you're having a one-day farm to school celebration and just need to purchase products for that one day. You could use it for opportunity buys. So sometimes in the middle of the season, farmers will have excess products that they're willing to sell at a very low price because they would like to sell it. And so that's a really good spot for it if you find out a farm has some extra tomatoes or something in the height of the season to get them cheaper through them. It's also great to build flexibility and to your menu for seasonality. So, for example, if you have green beans on your weekly menu and in April you find out that asparagus is really plentiful, you could buy asparagus to substitute into your menu for a few days or weeks depending on the size of your school in April. And that would likely fall under the micro-purchasing threshold. A lot of this is dependent on your school size as well. And then micro-purchasing can also be used to support a special program. I've seen solicitations for a harvest of the month -- that they do one harvest of the month event. Some schools that have very small farm to school programs can use micro-purchasing for that. Or if you have other special programs that you want that have smaller purchases, you can use micro-purchasing there. And so in the context of Ganderville, Michigan, there are a lot of opportunities for this as I mentioned. They're excited about doing their Apple Crunch this year, and they need local apples for 4,000 students. That's a one-day event. The price of that would likely be under that \$3,500 threshold, and so they could use micro-purchasing to procure apples for that event. If you didn't participate last year and are interested in participating in the coming year, feel free to email me to get more information about that. It's a super fun event. And then Ganderville could also use a spot-buy. So they found a farmer that had a surplus of cherry tomatoes that they couldn't sell, and they decided that they could swap them into their salad bar pretty easily for a couple days and take advantage of that low price from that local farmer. As I mentioned, they decided to swap green beans for their asparagus in April. Once you know Michigan's



seasonality -- and especially the seasonality of your particular location -- even in Michigan, seasonality varies pretty greatly from the south to the [inaudible]. So knowing your seasonality in your area can help you be more alert for opportunities to swap in local substitutes for some of those products. And also, some schools are able to use micro-purchasing in advance if it falls under the threshold. So I was working with a school a few weeks ago who will be purchasing cherry tomatoes from a local farmer for September and October. It falls under the threshold, and it's allowing her to work for a short period of time with a local farmer. So that's a really exciting opportunity. And with that, I'm going to pass it on to our colleagues from the Michigan Department of Agriculture to talk about local applications in a couple programs. So, first, I'll pass it to Jaime Malnar.

Thank you. USDA Foods and DoD Fresh. So when a school district orders their USDA Foods - - formerly known as commodities -- or DoD Fresh produce, local items may be available. So for the USDA Foods Program, the main one that comes to mind is the Peterson Farms Apple Slices. So if you're ordering through your consortia, the procurement has already been done on behalf of your district. An estimated 275,000 pounds of Peterson Farms Michigan apple slices were purchased in schoolyear 2014/2015 to the USDA Foods Program. The next is the Department of Defense Fresh Fruit and Vegetable Program. So Michigan spends roughly \$5 million each year on DoD produce. How it works is school districts allocate their USDA Foods entitlement to that program. There's no longer a limit on how much you can allocate to that program. And, again, procurement for this produce has been completed already for your district. In schoolyear 2014/2015, we estimated 40% of the produce that was filtered through that program was local. And for schoolyear 2015/2016, so far we're looking at 32%. Most of those produce items were apples, celery, and root vegetables. MDE is currently working with our DoD vendor to continue to push for local, also trying to come up with an identified system for those that are ordering the produce. It should be noted that sometimes the produce could come from Ohio just because the USDA and DoD Office [inaudible] local is more regional than a state boundary. And then also, it should be noted that federal programs need to consider price first. That's all that I have. Thank you.

Abby Harper: Great. Thank you. And, again, this is the Michigan Department of Education. I misspoke earlier when I said agriculture. Apologies. So now, I'll pass it to Melissa Lonsberry who's going to talk about the Child and Adult Care Food Program.

Hello, everybody. The Child and Adult Care Food Program. Typically purchases for early childhood programs fall under the federal threshold of \$150,000 for federal child nutrition programs. Local food purchasing decisions are to be documented using the informal



procurement method to ensure full and open competition as Aimee and Abby discussed earlier. So, for example, a daycare provider would buy local produce as much as she can, and she would do this by comparing prices for Michigan-grown produce at a local grocery store that she typically shops at, a local producer, and a large discount store. She would document that while she typically buys the produce at the local store or from the discounter, she also buys local produce from a farmers' market or a local producer because it's fresher and she can get access to fieldtrips and nutrition education. She would document how she made this decision on the informal procurement form and just provide justification as to the reasons why she made her decision.

Abby Harper: Great. Thanks, Melissa. And just to clarify, that is the \$150,000 threshold.

Yes.

Abby Harper: Because that is a federal program, they use the federal threshold of \$150,000. And so that allows many, if not most, childcare providers to use informal procurement methods. And they really can just target three local producers and compare prices accordingly, as well as -- as Melissa mentioned -- including specifications about educational fieldtrips and freshness of product. And then Adrienne Davenport will talk about the Fresh Fruit and Vegetable Program.

Thank you. For those of you who don't know, the Fresh Fruit and Vegetable Program is an optional grant program for schools in any range of K-8 that participate in the National School Lunch Program. And they apply each year to participate. To be eligible, they just need to be schools in the K-8 range, and they need to have at least 50% free and reduced. With that background, for those who do participate in the program, there are many ways to incorporate local foods into the program. You could choose global options when available and noted from existing relationships. Just make sure that the contracts do include the Fresh Fruit and Vegetable Program or updated with the Michigan Department of Education to include the program -- for example, with food service management companies or vendors. You can also use this for purchases with individual items -- so if you wanted to do just apples or just certain agricultural products. Or you could also use relationships with local farms for multiple items that a farm might provide. You could also purchase from school gardens or school farms for the program. And if you did have any questions, you can certainly contact me, and I would be happy to help you further.

Abby Harper: Great. Thank you, Adrienne. So with that, I just want to direct you to a couple additional resources. Our mifarmtoschool.msu.edu webpage has a lot of guides which I mentioned before, some informational sheets on farm to school, and we provide a lot of technical support. You can feel free to email me. I'll put my email up on this slide in a minute if



you have any further questions. The USDA also has a lot of really great procurement information. There's only so much you can cover in an hour. But the USDA has developed a webinar series that is 12 parts, and each one ranges from half an hour to an hour. So if you have a Saturday to kill, there's a lot of really great information on there. And they also have a lot of quick fact sheets that you can use for reference and a very detailed procurement guide. So I encourage you to check out all of those resources if you're interested in more. And I did mention Cultivate Michigan earlier, but that is a really great tool. Cultivate Michigan is a local purchasing campaign out of our Michigan Farm to Institution Network. And that's a really great tool for helping to identify where you can get some of these products locally. So if your questions are more, "Where can I find them?" that's a great resource to use. And with that, we can open it up to questions. If you have any questions, you can feel free to unmute yourself. Thanks so much for bearing with us with the muting yourself. And if you do have questions, you can chime in here. We've got about 20 minutes on the line where we can answer some questions. Oh, OK. And I'm looking through a couple of our questions before. There was a question brought early on in the conversation about whether or not there was ever a condition where a school could buy from Canada. So one thing we didn't talk about as much in this is Buy American Provision. So you want to talk about that, Aimee?

Aimee Happala: Yes. Well, basically with the National School Lunch Act, it's designed to make sure that we are purchasing American products whenever and wherever possible, provided that the price is reasonable. Of course, there are products that are not available in the United States and have to be sourced outside. So, certainly, there could be occasions where potentially you could purchase from Canada or Mexico. For instance, bananas, and pineapples, and things like that are not grown in the United States. But wherever possible, you do need to focus on buying American. Now the only way there ever would be a case not to is if the products are not from the United States or if the American products are significantly higher in price than you can get elsewhere. But those are extreme and rare occurrences. So hopefully that touches on that. If you'd like more information, you can certainly contact me outside of this webinar and we can get more information for you that way. But hopefully that helps.

Hello. This is Gary Slate from the US Department of Agriculture. I just wanted to add to that. That's a great description of buy America. But also with buy America, a product could be produced outside of the US but it needs to be processed at least 51% inside of the United States.

Aimee Happala: All right. Thanks, Gary.

You're welcome.



Abby Harper: And there's a question about accessing printouts of the presentation screens. This webinar is being recorded as I mentioned at the beginning. And we'll have it available within probably a week or so on our website -- mifarmtoschool.msu.edu. And you'll be able to access that there. And I can include the PDF as well if folks are interested in just having the printout of the PDF. I can get that to you all as well. Are there any other questions at this time? You can chime in or type in on the box, whatever you prefer. I can't tell if Josh is trying to ask a question or formulate a thought. But we'll wait for you, Josh, if you have a question. How many times does a micro-purchase have to happen in order to move to an informal bid? That is a really great question, Josh. And I would like to go back -- let me see if I can bring up this slide from the beginning. So, Aimee mentioned at the beginning some of the criteria for splitting up purchases. Let's see if we can bring that slide back up. So this is the slide with the threshold per purchase. So this is how you determine whether something falls into a formal procurement, an informal procurement, or a micro-purchase. So, basically, any of these rules apply to your purchasing. So if you are factoring in your total dollar amount from a vendor and that needs to be the unit of measure in terms of whether or not you crop that micro-purchase threshold, or if it's a single purchase order from one person. So, basically, whichever one of these five rules is sort of the highest, that's what you use to determine what category you fall into. So it could include total purchase orders from a single supplier over the course of the year, the aggregate total of all invoices for a contract. Basically, it's everything you're purchasing from one vendor that constitutes in this. And if you're using the micro-purchase, remember there's a rule about distributing it equitably. So you need to distribute those purchases amongst all five suppliers in your area. Do you want to add anything?

Aimee Happala: Yeah. That's great, Abby. I also wanted to add to that, Josh, that basically it kind of comes down to your intent. Now if you know you're going to purchase than \$3,500 worth of a specific item or a product category over the course of the schoolyear, you would then have to use the small purchase method basically. So the micro-purchase method isn't used in order to skirt around proper procurement procedures basically. So if you have good intent, if you're operating with fairness and integrity, and basically -- like, let's say for instance milk -- you know you're going to purchase more milk than 3,500 dollars' worth in a year, then you know you would want to use the small purchase method if it's going to be less than the \$100,000 threshold basically. So we just kind of have to think about your purchases as a whole by category, or item, or vendor, and operate with fairness and integrity that way. And micro-purchases are more intended for kind of one-time transactions or, like Abby touched on, special opportunities and whatnot. So hopefully that helps you there and whatnot. If you want us to go more in depth, you can certainly reach out to us outside of this webinar too. Thank you.

Abby Harper: Gary, did you want to add anything to that?



No, it was covered. Yeah, exactly. Micro-purchasing, as was mentioned, is usually an informal bid. But it is for mainly specialty items or trying out an item. So that is absolutely correct how it was answered.

Abby Harper: Thanks, Gary. And I also do want to emphasize throughout all of this, every school in Michigan is so unique. Rural versus urban, the size, what's around them, what their population is and preference of students. So there's really I think a million different questions that people could ask about procurement. And I think what helps is to just really think about that integrity and intention piece. Are you doing something to try and get around a rule, or are you going -- I mean, the USDA wants folks to be able to use procurement as it works for their school. So they've built in these rules for local to facilitate schools in getting some product that meets their definition of local. So they have created a system for doing this. And as long as you go through the system and do it with integrity and fairness throughout, I think that's really the sort of key metric of evaluation. There's a lot of questions of, "Is this appropriate? Or what if I do this, or tweak this there?" And I think all that goes back to just really just reflecting on sort of integrity and transparency throughout the process. So we have a couple other questions. Christine asked, "Can schools set local purchase percentages for their broadliners? Example -- 100% of dairy from Michigan, 20% of produce from Michigan, 10% of ground beef from Michigan, et cetera." You cannot require those, Christine, because that does get into the limiting competition piece. But you could use those criteria to apply geographic preference if you wanted. And with a lot of broadline distributors, they have products that you can select that are from Michigan, and so you can choose where those products come from or you can choose which products to purchase from that distributor. And if there's a Michigan product, you can choose that. I hope that answered your question. And then is the bid process used for every item individually or is it typical to do it by individual suppliers? For example, one produce item like lettuce versus a produce supplier or grower who had multiple items. Aimee, do you want to take that one?

Aimee Happala: Sure. Yes. Well, basically it kind of depends on how you set up your procurement process. But I would venture to say that most school districts are going to do things by suppliers. So you might have a milk provider, a produce supplier, a broadliner, maybe a chemical supplier -- big, main categories of products. But you certainly -- when it comes to micro-purchases or the small purchase threshold, if you have specialty things, or on occasion you could procure one item at a time or whatnot. But typically in school food service anyways, more than likely you're going to be bidding things out by suppliers and not by individual items. That might be different for different programs. But when it comes to school food service, that typically would be the case. So hopefully that answers your question that way.



Abby Harper: Yeah. And with that, too, we mentioned earlier the ability to put up solicitations for different programs. So if you are doing a farm to school program and you need lettuce for that program, you can sort of separate out a little bit based on that as long as it's not artificially separating purchases.

Right. And if you are finding a distributor that has a whole slew of different items that you're looking for and you specify it in your solicitation, that is OK to go with that individual distributor or that distributor. But if there's a specialty item, as I mentioned, in which the distributor that you want to go with that has a whole slew items and that item that you want is a specialty item, you could go to an individual provider or supplier.

Abby Harper: And I do want to emphasize there I think a lot of folks who work with distributors often immediately think they might be a little bit more limited in their ability to participate in farm to school because they work with a distributor. But more and more distributors are providing information on where products are coming from, and more and more distributors are responding to a demand for folks to know where the products are that come from within their local region. So there are a lot of distributors for different products who are making that information available. And as we mentioned before, Cultivate Michigan is trying to synthesize a lot of that information to make it very easily digestible for all of you so that it's readily acceptable. So don't think that just because you work with a distributor it prevents you from participating in farm to school because there are a lot of opportunities with distributors as well. Any last questions? All right, I've seen nobody typing and nobody on the line. Please make sure to take down our contact information if it's interesting to you. Both Aimee and I are available, and we can forward any requests that may be about specific programs to Jaime, and Adrienne, and Melissa. So our emails are up there. You can feel free to email us. And we can forward any requests that we can't answer. Thanks so much to Gary Slate for being on the call with us as well. That was really great. And thanks to our Michigan Department of Education colleagues for being here in the room with us. And have a good one, everybody. Happy Monday!

And you too. Well done.

Abby Harper: Thanks, everyone.

Thank you.

