

POLICIES COMMITTEE MEETING
Monday, November 2, 2026
White Sulphur Springs School Library
5:00 p.m.

Committee Members

*Kari Marks
Sandra Luther
Mari Hamm
Meredith Feddes
Lacey Arthun

Agenda

Policies:

- 1) 2510 School Wellness
- 2) 8210 Procurement for Food Service



Policy 2510: School Wellness

Status: ADOPTED

Original Adopted Date: 10/18/2022 | **Last Revised Date:** 08/21/2024 | **Last Reviewed Date:** 08/21/2024

The School District is committed to providing school environments that promote and protect children's health, well-being, and ability to learn by supporting healthy eating and physical activity. Therefore, it is the policy of the School District that:

The development of the school wellness policy, at a minimum, will include:

1. *Community involvement*, including input from teachers of physical education and school health professionals, parents, students, school food service, the school Board, school administrators, educators, and the public. Training of this team of people on the components of a healthy school nutrition environment is recommended.
2. *Goals for nutrition education*, nutrition promotion, physical activity, and other school-based activities that are designed to promote student wellness in a manner that the local education agency determines appropriate.
3. *Implementation, Periodic Assessment, and Public Updates*, including expanding the purpose of the team of collaborators beyond the development of a local wellness policy to also include the implementation of the local wellness policy with periodic review and updates, inform and update the public every three years, at a minimum, (including parents, students, and others in the community) about the content and implementation of the local wellness policies, and to measure periodically and make available to the public an assessment of the local wellness policy, including:
 - The extent to which schools are in compliance with the local wellness policy;
 - The extent to which the LEA's local wellness policy compares to model local school wellness policies; and
 - The progress made in attaining the goals of the local wellness policy.
4. *Nutrition guidelines* for all foods available on each school campus under the local education agency during the school day, with the objectives of promoting student health and nutrient-rich meals and snacks. This includes food and beverages sold in a la carte sales, vending machines, and student stores; and food and beverages used for classroom rewards and fundraising efforts.
5. *Guidelines for reimbursable school meals* to ensure that the District offers school meal programs with menus meeting the meal patterns and nutrition standards established by the U.S. Department of Agriculture.
6. *A plan for measuring implementation* of the local wellness policy, including designation of one or more persons within the local education agency or at each school, as appropriate, charged with operational responsibility for ensuring that each school fulfills the District's local wellness policy.

The suggested guidelines for developing the wellness policy include:

Nutrition Education and Nutrition Promotion

All students K-12 shall receive nutrition education that teaches the knowledge and skills needed to adopt healthy eating behaviors and is aligned with the Montana Health Enhancement Standards. Nutrition education shall be integrated into the curriculum. Nutrition information and education shall be offered and promoted throughout the school campus and based on the U.S. Dietary Guidelines for Americans. Staff who provide nutrition education shall have the appropriate training, such as in health enhancement or family and consumer sciences.

Health Enhancement and Physical Activity Opportunities

The District shall offer health enhancement opportunities that include the components of a quality health

enhancement program taught by a K-12 certified health enhancement specialist, if permitted by staffing levels. Health enhancement shall equip students with the knowledge, skills, and values necessary for lifelong physical activity. Health enhancement instruction shall be aligned with the Montana Health Enhancement Standards.

All K-12 students of the District shall have the opportunity to participate regularly in supervised, organized or unstructured, physical activities, to maintain physical fitness, and to understand the short- and long-term benefits of a physically active and healthy lifestyle.

Nutrition Standards

The District shall ensure that reimbursable school meals and snacks meet the program requirements and nutrition standards found in federal regulations including but not limited to Smart Snacks in School Nutrition Standards. The District shall encourage students to make nutritious food choices through accessibility, advertising and marketing efforts of healthful foods.

The District shall monitor all food and beverages sold or served to students during the normal school day, including those available outside the federally regulated child nutrition programs (i.e., a la carte, vending, student stores, classroom rewards, fundraising efforts). The District shall consider nutrient density and portion size before permitting food and beverages to be sold or served to students. The Superintendent shall continually evaluate vending policies and contracts. Vending contracts that do not meet the intent and purpose of this policy shall be modified accordingly or not renewed.

Other School-Based Activities Designed to Promote Student Wellness

The District may implement other appropriate programs that help create a school environment that conveys consistent wellness messages and is conducive to healthy eating and physical activity, such as staff wellness programs, non-food reward system and fundraising efforts.

Maintaining Student Wellness

The Superintendent shall develop and implement administrative rules consistent with this policy. Input from teachers, parents/guardians, students, school food service program, the school Board, school administrators, and the public shall be considered before implementing such rules. A sustained effort is necessary to implement and enforce this policy. The Superintendent shall measure how well this policy is being implemented, managed, and enforced. The Superintendent shall report to the Board, as requested, on the District's programs and efforts to meet the purpose and intent of this policy.

United States Code

PL 108-265

PL 111-296

Description

The Child Nutrition and WIC Reauthorization Act of 2004

The Healthy, Hunger-Free Kids Act of 2010

Cross References

8200

Description

[Food Services](#)



Policy 8210: Procurement for Food Service

Status: ADOPTED

Original Adopted Date: 08/21/2024 | **Last Reviewed Date:** 08/21/2024

Procurement Policy for School Food Purchases and Use of Federal Funds

The School District will adhere to the following requirements for any procurement related to food service:

Below are samples only and other language can be used, adjusted, or utilized. Please feel free to make changes, additions or add any other necessary items to meet the needs of your district.

Purchase Procedures & Thresholds:

Definition/Instructions

Micro-Purchase: Micro-purchases may be awarded without soliciting competitive price or rate quotations if the non-Federal entity considers the price to be reasonable. To the maximum extent practicable, the non-Federal entity should distribute micro-purchases equitably among qualified suppliers. The school district is responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures.

School districts may use the Federal micro-purchase threshold of up to \$10,000 or may establish a higher threshold, up to \$50,000 if the district self-certifies ([CFR 200.320 \(a\)\(1\)\(iv\)](#)).

School District's Established Micro-Purchase threshold (choose one):

- The School District self-certifies a threshold of \$30,000 - CFR 200.320 (a)(1)(iv)) and maintains documentation to be made available to the Federal awarding agency and auditors in accordance with § 200.334. The self-certification must include a justification, clear identification of the threshold, and supporting documentation of any of the following:
 - A qualification as a low-risk auditee, in accordance with the criteria in § 200.520 for the most recent audit;
 - An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or,
 - For public institutions, a higher threshold consistent with State law.

Definition/Instructions

Small Purchase: Informal purchase method for open competitive purchases. For purchases higher than the micro-purchase threshold (\$10,000 or SFA's higher amount if self-certified) but does not exceed the simplified acquisition threshold (\$80,000).

- If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the non-Federal entity. Documentation of the procurement process (vendor name, contact method, name of person providing price quote, price quoted, date price quote obtained, duration of price quote).
- **Small Purchases greater than \$30,000 up to \$80,000.** \$80,000 is the small purchase threshold for the state of Montana per Section 20-9-204, MCA.
 - Small purchases will be handled in a fair and equitable manner consistent with district policy on purchasing.
 - The District will obtain two or more quotes from qualified sources.
 - The District may enter into a cooperative purchasing contract for procurement of supplies with one or more districts or a Cooperative Services Program. This allows the District to

participate in a cooperative purchasing group to purchase supplies through the group without bidding if the cooperative purchasing group has a publicly available master list of items available with pricing included and provides an opportunity at least twice yearly for any vendor, including a Montana vendor, to compete, based on a lowest responsible bidder standard.

Definition/Instructions

Formal Purchase: If the aggregate amount exceeds eighty thousand dollars (\$80,000), the contract must be awarded through a formal bid process and a call for bids or request for proposals shall be published according to 20-9-204, MCA. No contract shall be divided for the purpose of avoiding the formal procurement process.

- **Formal Purchases greater than \$80,000:**

- If the aggregate amount exceeds eighty thousand dollars (\$80,000), the contract must be awarded through a formal bid process and a call for bids or request for proposals shall be published according to 20-9-204, MCA. No contract shall be divided for the purpose of avoiding the formal procurement process.
- The District may enter into a cooperative purchasing contract for procurement of supplies with one or more districts or a Cooperative Services Program. This allows the District to participate in a cooperative purchasing group to purchase supplies through the group without bidding if the cooperative purchasing group has a publicly available master list of items available with pricing included and provides an opportunity at least twice yearly for any vendor, including a Montana vendor, to compete, based on a lowest responsible bidder standard.

Geographic Preference:

No Geographic Preference (advantage based on location) is allowed with federal funds except for documented Farm to School (Farm to Plate) efforts. Therefore, as part of Farm to School may choose to apply a geographic preference when procuring unprocessed locally grown or locally raised agricultural products only.

Buy American:

The District will adhere to "Buy American" for the food service program 7 CFR 210.21(d). Therefore, Food Service is required to purchase, to the maximum extent possible, domestic products for use in meals served in our Child Nutrition Program. There are two limited exceptions when non-domestic foods may be purchased. These exceptions are determined by the SFA:

- The food or food product is not produced or manufactured in the United States in sufficient and reasonably available quantities of a satisfactory quality; or
- Competitive bids reveal the cost of a United States food or food product is significantly higher than the non-domestic product--Food preferences can only be met with foreign goods.
- SFA must document exceptions and keep records.

Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms. 2 CFR 200.321(a):

- The non-Federal entity must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

Standards of Conduct for District Employees:

- The School District maintains the following code of conduct for any employees engaged in award and administration of contracts supported by Federal Funds:
- No District employee will engage in any procurement when there is a conflict of interest, real or perceived, and District employees cannot solicit or accept any gratuities, favors or anything of monetary value from prospective vendors. This shall not preclude district personnel from serving on boards or participating in organizations that support the district's need to obtain quality services and supplies.
- No District employee shall participate in the selection, award or administration of a contract when any of the following persons have a financial interest in the firm selected for award:
 - The employee
 - Any member of his/her immediate family
 - People with whom there is an intimate personal relationship
 - An organization which employs or is about to employ any of the above
- The District would like all employees to behave with the utmost integrity and never be self-serving, be fair in all aspects of the procurement process, be alert to conflicts of interest, and avoid any compromising situations.
- Employees found to be in violation of this policy are subject to disciplinary action, up to and including termination.

Montana Code Annotated

20-10-207

Description

School food services fund

20-9-204

Conflicts of Interest letting contracts, and calling for bids -- exceptions

Code of Federal Regulations

7 CFR 226.22

Description

Procurement standards

Cross References

1332

Description

[Authorization of Signatures](#)

7320

[Purchasing](#)

8200

[Food Services](#)