



**POLICY AND PROCEDURES**

Rhode Island Department of Education  
 Office of Statewide Efficiencies  
 Child Nutrition Programs

**Equipment Purchases in the National School Lunch Program**

**Program:**  
SNP

**Date Revised:** 11/8/2023

**Approved by:** Jessica Patrolia

**BACKGROUND & PURPOSE:**

Government-wide requirements found in the Office of Management and Budget (OMB) guidance cited at 2 CFR 200 (Subpart E Cost Principles) require a School Food Authority (SFA) to obtain the prior written approval from the State Agency before incurring the cost of a capital expenditure that will be supported by funds from the non-profit school food service account. Both the OMB guidance and Generally Accepted Accounting Principles identify equipment as a capital asset. Equipment is further defined as tangible personal property (including information technology systems) having a useful life of one year or longer and a per-unit acquisition cost that equals or exceeds the lesser capitalization level established for financial statement purposes, \$5,000, or a lower threshold set by State or local level regulations.

Based on this guidance, RIDE has required SFAs purchasing equipment that will be used to support the operations of the School Nutrition Programs (SNPs) and which will be funded in whole or in part by funds from the non-profit school foodservice account to obtain approval from RIDE prior to making any such purchases. The objective is for RIDE’s prior review and approval process to provide reasonable assurance that the equipment’s acquisition is necessary for program purposes, that the cost is reasonable, and that the SFA’s nonprofit school food service account can absorb the cost. Equipment purchases made for which prior approval was not obtained are not considered allowable purchases of the non-profit school food service account.

FNS has recognized that the requirement that State Agencies approve a purchase that meets the definition of equipment as described above can be administratively burdensome. Therefore, through USDA Policy Memo SP39-2016, FNS has authorized the continued flexibility for State Agencies to implement an option that would alleviate some administrative burden associated with the prior approval process without departing from Federal grant management rules in the form of a pre-approved equipment list which has received approval from the USDA Regional Office. Under this flexibility, State Agencies with an approved equipment list may allow SFAs to purchase approved items, following competitive Federal, State, or local procurement procedures, as applicable, without submitting a request to the State Agency for approval.

The following procedure outlines the allowable use of RIDE’s pre-approved equipment list to streamline the approval process for equipment purchases to support the School Nutrition Programs.

**Procedure:**

For SFAs purchasing equipment to support the operation of the School Nutrition Programs, the cost of which will be funded by the non-profit school food service account:

1. If the equipment cost is under the SFA's local capitalization threshold or \$5,000 (whichever is lower), the SFA does not require any further approval from RIDE.
2. If the equipment is identified on the Pre-Approved Equipment List found below, the SFA does not require any further approval from RIDE.
3. If the equipment needed is not found on the Pre-Approved Equipment List and the cost is greater than the local capitalization threshold for the SFA or \$5,000 (whichever is lower), then the SFA must complete the "Capital Expenditure Request" form found within the "Applications" menu in CNP Connect. After completing the form, email the RIDE CNP Office to notify them of your submission. A member of the RIDE CNP team will review your request and approve or return for revision. Equipment cannot be purchased with non-profit school food service account funds until RIDE approval has been granted.
4. The SFA must comply with all local, state, and Federal procurement requirements when purchasing equipment using funds from the non-profit school food service account. Remember, except in instances where an MPA procurement was conducted by the RIDE CNP Office on behalf of CNP operators, the RI state MPA may only be used as one sources of quotes in the competitive procurement process and cannot be used exclusively and in lieu of conducting a competitive procurement.
5. For any equipment where use is shared outside of the school food service, the amount funded by the non-profit school food service account must be appropriately allocated.
6. RIDE will review equipment purchases supported by the non-profit school foodservice account as part of the Administrative Review and/or Procurement Review process. If RIDE identifies equipment purchases that are unallowable, either because they were not on the pre-approved equipment list, the SFA did not request and receive prior approval from RIDE, and/or the SFA failed to follow proper procurement procedures, repayment from non-Federal sources to the non-profit school foodservice account may be required.

**RIDE Pre-Approved Equipment List**

**Carts/Cabinets**

- Can Dispenser Rack
- Heated Transport Cart
- Holding Cabinet
- Insulated Transport Cart
- Proofing Cabinet
- Refrigerated Transport Cart
- Sheet Pan Lowerator
- Storage Rack
- Trash Cart
- Tray Dispenser
- Utility Cart

**Cleanup**

- Dish Machine
- Dish Table
- Disposer
- Equipment to Handle Recyclables
- Pot and Pan Machine
- Pot and Pan Sink
- Pulper
- Under-counter Dish Machine
- Water Booster Heater
- Water Softener

## Preparation

- Blast Chiller
- Blender
- Bread Slicer
- Buffalo Chopper
- Cold Sandwich Station
- Countertop Mixer
- Dough Divider/Bun Cutter
- Dough Impinger
- Dough Roller/Sheeter
- Floor Mixer
- Food Processor
- Potato Peeler
- Produce Soak Sink
- Slicer
- Vegetable Washers/Produce Wash Sink
- Vertical Cutter Mixer

## Cooking

- Boiler-less Steamer
- Combi-Oven
- Convection Oven
- Microwave Oven
- Pizza Oven
- Rotary Oven
- Steamer
- Fire Suppression System
- Griddle
- Hood/Exhaust System
- Range
- Steam Griddle
- Steam Kettle
- Tilting Skillet/Braising Pan
- Toaster
- Water Descaler System for Steamer

## Storage

- Reach In Refrigerator
- Refrigerated Display Case
- Refrigerated Drawer
- Refrigerator Freezer Dual Temperature Unit
- Stainless Steel Cabinets
- Stainless Steel Cabinets with Sink Inserts
- Walk In Freezer
- Walk In Refrigerator
- Milk Cooler
- Pass Thru Refrigerator
- Reach In Freezer

## Service

- Cashier Station
- Condiment Bar
- Hot Food Well
- Ice Machine
- Pre-pack System
- Salad Bar
- Sneeze Guard
- Tables and Chairs for Dining Room
- Trayline
- Vending Machine (Refrigerated/Non Refrigerated) Used for Reimbursable Meals
- Youth Salad Bar

## Transportation

- Food Transport Van or Food Distribution Vehicle
- Lift Gate, Added to New or Existing Food Transport Van

## Work Tables

- Stainless Steel Work Table
- Other Work Table

**Replacement Parts** – Replacement parts for equipment on the Pre-Approved Equipment List are also pre-approved, regardless of cost

**Farm to School and School Gardens** - An SFA may use nonprofit school food service funds to buy supplies or equipment for the school garden or school farm if they are used within the context of the school meal programs and serves the purpose of operating and improving the school meal program. The following items constitute pre-approved farm to school equipment that may be purchased with funds from the non-profit school foodservice account in accordance with the above procedures.

- Composting Bins
- Garden Tiller
- Grow Lights
- Hoop House Kit
- Hydroponic and Aquaponic Systems
- Indoor Garden Starting Kit
- Irrigation System for Garden
- Rain Barrel/Water Tank
- Raised Bed Kit
- Wagon/Wheel Barrow

Note: The items above will not be considered allowable if they are permanent, immovable structures. Permanent structures would be considered capital infrastructure costs, which are not an allowable use of nonprofit school food service funds.

**References:**

[Uniform Grant Guidance](#): 2 CFR 200 Subpart E – Cost Principals

[Indirect Costs – Guidance for State Agencies & School Food Authorities](#)

[USDA Policy Memo SP 39-2016](#): State Agency Prior Approval Process for SFA Equipment Purchases

[USDA Policy Memo SP 05-2017](#): Q&A: Purchasing Goods and Services Using Cooperative Agreements, Agents, and Third Party Services

[USDA Policy Memo SP 06-2015](#): Farm to School and School Garden Expenses

[USDA Policy Memo SP 32-2009](#): School Garden Q&As.