Adapted from ICN “Procurement in the 21st Century” to include information from Texas Dept of Agriculture Administrative Reference Manual and updated USDA information for a six hour overview of Procurement in School Nutrition Programs.
Patricia Mouser, RD, LD, SNS
ICN Consulting Trainer
Training Overview

• Section 1 – Procurement Principles
• Section 2 – Competitive Purchasing
• Section 3 – Solicitation for Goods, Products, and Services
• Section 4 – Contracts
• Section 5 – Cooperative Purchasing Groups
Procurement

- A multi-step process for obtaining goods, products, and/or services at the best possible price
Conflicting Regs (ARM 17.15)

- “While there are regulations in Education Department General Administration Regulations (EDGAR) that conflict with USDA regs, in most situations they are compatible. However, if there is a regulatory conflict, CEs are required to follow the USDA regs for all CNP funds.”
Section 1 –

Procurement Principles

• Topics:
  – Principles of Good Procurement
  – Ethics
  – An Effective Procurement System
  – Stakeholders
  – Inventory Management
  – Child Nutrition (CN) Labeling Product
  – Product Categories
  – Screening Products
  – Appearance and Taste Screening Criteria
  – Product Descriptions
  – Forecasting
  – Purchasing Local Foods
Principles of Good Procurement

- Free and open competition
- Fairness and integrity
- Responsive and responsible vendors
Buy American (ARM 17.53)

- Purchase domestic commodities and food products that are
  - processed in the US, or
  - processed using agricultural commodities produced in the US.

- SFA must follow procurement rules.
Competition

- Secures the best price for the best quality product or service
Full and Open Competition (ARM 17.30)

- Level playing field
- Same opportunity to compete
Restrictive Competition

• Procurement procedures may never unjustifiably restrict or eliminate competition.
Restrictive Competition Examples

- Placing unreasonable requirements on distributors in order to qualify
- Having organizational conflicts of interest
- Having unnecessary bonding and experience requirements
- Specifying only a brand name product instead of allowing a preapproved equal product to be offered
Fairness and Integrity

• Critical to achieving free and open competition

• Handout: Good Practices of Fairness and Integrity
Accountable

• The effective use of School Nutrition Program (SNP) funds
• State and local officials who administer these programs are accountable to taxpayers.
Transparent

- Clear
- Forthright
- Out in the open
Ethics

• Important to fair competition
• Moral standards used to guide decisions in personal and professional lives
• Practices that promote free and open competition
• Unethical practices can damage reputations of the person and company
Unacceptable and Illegal Practices

• Showing preference to suppliers because of pressure from management

• Allowing personality to enter into purchasing decisions

• Giving preference to suppliers based on long-term business relationships or political connections

• Allowing anyone involved in manufacturing or selling the product to help with writing bid specifications or bid provisions
Conflicts of Interest

- Is any action that allows a person to benefit at the expense of public interest or their employer

- Excuse yourself if involved in the conflict of interest

- Check district requirements for signing conflict of interest statement
Confidentiality

- Providing confidential information to any person or entity that was not designated to be privy to that information is unethical.

- Pricing of bids may not be made public until after the award process.
Responsive and Responsible

- Consistent with the size and nature of the procurement.
- Clearly indicates compliance without material deviation from the solicitation’s terms and conditions.
- Capable of performing successfully under the terms and conditions of the contract.
Eligible, Able, Willing

- An eligible vendor possesses licensing or certification with no conflict of interest.
- An able vendor is capable of providing the desired product or service.
- A willing vendor is thought to be interested in obtaining the business.
A Special Price!

A vendor tells you there is a special on whole grain-rich dinner rolls. He states the rolls meet the USDA whole grain-rich criteria. The rolls will only be offered at a special price on Thursday. To receive the special price, you will need to attend a luncheon hosted by the vendor and purchase the rolls during this time.
A Special Price! – No

Attending supplier-hosted lunches, dinners, or business organization meetings is acceptable as long as there is no obligation to do business with the host supplier as a result of attendance.
“CEs must have written procedures that include ethical standards or a code of conduct that govern the performance of employees, officers and agents of the CE that are engaged in the selection, award and administration of the contracts.”
Code of Conduct (cont)

- Financial Ethics (CAA Local)
- State & Federal Revenue Sources (CB Local and CBB Legal)
- Conflict of Interest (DBD Legal and Local)
- Employee Standards of Conduct (DH Legal and Local)
Effective Procurement System

- Competent personnel
- Appropriate equipment
- Proper facilities
- Communication
- Easy and prompt feedback system
Procurement and Communication

• Procurement is a complicated process that requires open communication, unity, and dedication from all entities in the supply chain.
School Nutrition Supply Chain

- SFA staff
- State agency
- Distributor
- Broker
- Manufacturer
- USDA
Planning

• Taking a systematic approach before releasing the solicitation

• Handout: An Effective Procurement System
Menu

• The driving force that begins the procurement process

• Must meet all federal guidelines and be appealing to the customer
Standardized Recipes

• Use to prepare menu items
• Identify the specific quantity for each ingredient
• Determine the number of servings
• Determine portion size for the recipes
• Good results and yield every time
Stock Keeping Units (SKUs)

- A unique identifier for each unit of product
- Often the product code number
- Too many SKUs equate to many different bid specifications
Reducing SKUs

- Eliminating menu items that sell less than 10-15%.
- Using the same product for more than one menu item.
- Allowing only substitutions that have been approved by the person responsible for purchasing.
Stakeholders

- SFA Staff
- State Agency
- Distributor
- Broker
- Manufacturer
- USDA
SFA Staff

- School nutrition operation
- Equipment
- Stock Keeping Units (SKUs)
- Product specifications
- Bids
- Deliveries
- Federal, state, and local regulations
- Procurement team (i.e. Director, Managers, Staff, Business Manager, Procurement Officer, and Board Members)
State Agency

- Administers the Child Nutrition Programs
- Reviews procurement procedures
- Reviews and approves each Foo Service Management Company (FSMC) contract (including supporting documentation) FSMC
- Provides training
Distributor

- Commercial food company
- Purchases, receives, and/or stores commercial food products
Brokers

• Independent sales agents who negotiate sales for manufacturers

• Introduce new products

• Can provide samples for taste-testing
Manufacturers

- Process raw products
- Develop new products
- Send finished products to distributors
USDA

- Responsible for administration of the nation’s child nutrition programs
- Responsible for USDA Foods distribution programs
Stakeholders’ Expectations

- Each party to have some basic knowledge on the operation’s functionality
- A steadfast approach in providing a healthy school environment
Inventory Management

- Manage inventory efficiently is crucial.
- Increase food and labor costs can occur with erratic orders.
- Maintain balance between inventory and receiving food.
- Control cost while meeting needs of organization.
Inventory

- Know the value of food and supplies
- Effective receiving procedures
- System of accounting for items removed from inventory
- Effective counting of items in stock
- Calculate the financial value of the inventory
Inventory Tracking

- Reduced inventory
- Reduced costs
- Reduced paperwork
Par Stock

- Predetermined inventory quantity for a particular item
- Serves as an indicator on when to reorder the product
Receiving Food

• Ensuring food products received are the food products ordered

• Best Practices:
  – provide a copy of the order to the person receiving the delivery,
  – check the products delivered against the products ordered,
  – use a two-wheel truck and/or carts to move products from the receiving dock,
  – follow the hazard analysis and critical control points (HACCP)-based food safety plan,
  – keep a clip board or other flat surface available to assist in the receiving process, and
  – communicate to the delivery person and the appropriate SFA staff member product shortages and quality concerns.
Child Nutrition (CN) Labeling Program

- Option to include a standardized food crediting statement on product label
- Requires an evaluation of a product’s formulation by FNS
CN Label

- Identifies contribution of a product toward the meal pattern requirements
- Serves as protection from claims about a product
- Provides a warranty against audit claims
- Simplifies cost comparison of similar products

- Handout: Sample CN Label
Product Categories

• Distributor’s Choice Label
• Private Label
• Manufacturer’s Brand Label

• Handout: Product Categories Chart
Screening Products

- Provide a list of preapproved, equal product brands
- Forbid specifying only a brand name product (federal regulation)
- Must allow a preapproved equal product to be offered

- **Handout:** Product Screening Chart
- **Activity:** Appearance and Taste Screening Criteria Example
Product Specification

• A set of requirements to be satisfied by a product, material, and/or process

• Handout: Product Description
Forecasting

• Predicts and estimates the goods, products, and/or services needed

• Analyzes current and historical data to accurately determine future trends

• Allows procurement plans to evolve each fiscal year
Sample Velocity Report

- Provides quantity, date of purchase, and other information about each item received
- Is a tool for SFA staff to use when forecasting
Strengthening Bid Integrity

• Develop good forecasts
• Ensure quantities are accurate
Food Buying Guide Calculator for Child Nutrition Programs

Choose a Food group by clicking on an image below, or enter a keyword or food item in the Search field to the right, then click Go. AVOID THE USE OF PUNCTUATION.

Meat/Meat Alternatives
Vegetables
Fruits
Grains/Breads
Milk
Other Foods
As Purchased (AP) and Edible Portion (EP)

- AP: weight of the product as it exists when purchased
- EP: part of the product that can be consumed
- AP weight greater than the EP weight

Activity: Purchasing Decisions
Past, Present, Future

- Reflection on the past
- Consideration of present conditions
- Speculation as to the future

Activity: Forecasting Questions
Forecasting Sample Template

- Project the procurement needs for specific times

  - **Handout**: Sample Product Forecast Chart
  - **Handout**: Forecasting Good Practices
Section 2 – Competitive Purchasing

• Topics
  – Micro-Purchases/Small Purchases
  – Invitation for Bids (IFBs)
  – Request for Proposal (RFP)
  – Geographic Preferences
  – Noncompetitive Proposal
Types of Competitive Procurement (ARM 17.32-17.52)

• Micro-purchases
• Small Purchases
• Invitation for Bid (IFB)
• Request for Proposal (RFP)
Micro-Purchases (ARM 17.35)

• A single acquisition/purchase that has a total aggregate cost that is equal to or less than $10,000; total aggregate cost may consist of one product/service or multiple products/services whether that purchase occurs weekly, monthly, or annually.
Small Purchases (ARM 17.40)

- Relatively simple and informal procurement methods
- $250,000 Federal threshold
- $50,000 Texas threshold
- Competition must still occur
Small Purchase Documentation

• Request the same information from all prospective vendors

• Obtain three sources that are eligible, able, and willing

• Handout: Small Purchase Request Template

• Handout: Small Purchase Checklist
Invitation for Bids (IFBs)
(ARM 17.42)

- A competitive, formal, sealed bid method to obtain a price quote
IFBs

• The public announcement and opening are very important phases

• Negotiation is not used with competitive sealed bidding

• Fixed price contract awarded to lowest priced bid

• Must be responsive and responsible
Use an IFB

- Complete specifications or descriptions of the product or service are available
- Responsive bids do not differ other than price
- More than one qualified source is willing and able to compete for the award
- Can use geographic preference as applicable
Request for Proposal (RFP)

• Proposal that explains how the prospective vendor will meet the objectives of the solicitation document

• Includes a cost element that identifies the costs to accomplish the proposal
RFP

- Identify goods, products, and/or services needed
- Publicize
- Used to solicit proposals
Components of the RFP

• State the purchasing agency’s need

• Specify the anticipated terms and conditions of the contract

• Provide information that the respondent must include in their proposal
RFP Components

• Identify factors purchaser will use to evaluate proposals and award contracts

• Describe how technical and cost factors will be considered

• Award will be made to the firm most advantageous to purchasing agency
Competitive Proposal Evaluation

- Price
- Product specifications
- Service and deliveries
- Geographic preferences
- Overall qualifications
RFP Scoring Criteria

• Include RFP scoring criteria in the solicitation document
• Assign a point value, percentage, or scoring system for each factor to be evaluated
• No prescribed maximum evaluation points
• Cost should be primary factor but does not need to be at 50% or more
• Can include others in the evaluation process
• Rank proposals separately and independently
Rank the Proposals

• Have at least two persons review and rate the proposals

• Employ a two-step process: review technical proposals before cost proposals

• Score based on points or percentages
Awarding the Contract

- After negotiations and modifications, each company will submit a best and final offer
- Technical proposals must meet the SFA’s needs
- Award contracts on the basis of the best overall value
Above and Beyond

• The award decision must always be based on the criteria outlined in original RFP

• Decisions can’t be based on additional services/products vendors can provide

• Activity: RFP Evaluation Scoring Worksheet
Geographic Preference

- 2008 Farm Bill
- Encourages the purchase of unprocessed agricultural products locally grown and raised
Unprocessed Locally Grown/Raised

• Allows the purchasing institution to apply a geographic preference procurement option

• Final rule published in 2011
Geographic Preference – Optional

• No requirement that institutions must purchase locally

• Geographic preference is for raw and unprocessed products as outlined in USDA policy memo
### Geographic Preference Evaluation Example

<table>
<thead>
<tr>
<th>Category</th>
<th>Points</th>
</tr>
</thead>
<tbody>
<tr>
<td>Price</td>
<td>30</td>
</tr>
<tr>
<td>Product specifications</td>
<td>20</td>
</tr>
<tr>
<td>Service and deliveries</td>
<td>15</td>
</tr>
<tr>
<td>Geographic preference</td>
<td>15</td>
</tr>
<tr>
<td>Discounts, rebates, and applicable credits</td>
<td>15</td>
</tr>
<tr>
<td>Overall qualifications</td>
<td>05</td>
</tr>
</tbody>
</table>

- **Handout:** Using Geographic Preference in Four Steps
- **Handout:** Sample Geographic Preference Language
Noncompetitive Proposal (ARM 17.47-17.52)

- Use when competition is deemed inadequate due to emergency
- Most widely misunderstood
- Negotiations must include same procedures as competitive proposals
Procurement by Noncompetitive Proposal

- Item is available only from a single source
- Emergency will not permit a delay
- Awarding agency authorizes noncompetitive proposals
- Competition is determined inadequate
Use a Noncompetitive Proposal

- A single solicitation response or offer is received
- More than one offer is received but none are responsive
- Public exigency or emergency
- Only one source of the product or service exists
Sole Source

- Purchasing cutting-edge technology or highly technical scientific products
- SFA must seek prior approval from state agency
- Must not restrict competition
Sole Source  (ARM 17.50)

- Must be approved prior to award by the applicable state agency
- Requirements vary by state
Section 3 – Solicitation for Goods, Products, and Services

• Topics
  – Solicitation Document
  – Solicitation Lead Time
  – Types of Solicitation
  – Solicitation Announcement
  – Elements of a Solicitation Document
Solicitation Document Required (ARM 17.63-17.71)

- Required for every procurement of a good or service
- Provides procedural guidance
- Detailed descriptions regarding the required elements
Solicitation Document Information

• Permit the potential respondent to submit an adequate response

• Describe how technical and cost factors will be considered

• Measure and document to reflect the reason for company selection
Updating Quantities

• Accurate and up-to-date
Units of Measure

- Cases
- Count
- Pounds
- Edible serving size
Cost Per Serving

• Choose unit large enough that price carried to four decimals will register

• Unit of measure should be chosen that controls the cost per serving
Solicitation Lead Time

• Amount of time necessary for distributor to prepare and deliver product to district

• 8-12 week lead time is preferred

• Activity: Mock Procurement Timeline Worksheet Sample
Types of Solicitations

- Line item solicitation
- Market Basket Solicitation/Product Groupings Bids
- All or Nothing Solicitation
- Competitive Procurement
  - IFB or RFP
- Respondents can consider all factors to determine the solicitation price
Line Item Solicitation

• Individual items are solicited
• Vendor can bid on each item accordingly
Market Basket/Product Groupings Solicitation

- The vendor submits a solicitation for the entire group (lot) of items
Prime Vendor Solicitation

• Estimated quantities and pricing multiplied to determine price for each item

• Handout: Solicitation Types Advantages and Disadvantages
Solicitation Announcement

- General nature of the goods or services to be procured
- Method of procurement that will be used
- How they can obtain the solicitation or more information
- Due date for responses to the solicitation
Advertising the Solicitation

- State designated newspapers and trade periodicals
- Designated internet sites
- Direct mailings to known vendors and public
Elements of Solicitation Document

- What should be considered before creating the solicitation document?

- Handout: Solicitation Document Summary Chart
Section 4 –

Contracts

• Topics
  – Contracts
  – Purpose of a Written Contract Summary
  – Elements of a Contract
  – Types of Contracts
  – Contract Award
  – USDA Foods and Processing
Contracts (ARM 17.97-17.108)

• Formal, legally enforceable agreement between a buyer (client) and a seller (vendor)

• Establishes a legally binding obligation

• Seller to furnish goods and/or services

• Buyer to compensate the seller
Legal Authority

• Check with district’s legal authority before implementing or signing a contract

• State may have additional requirements

• **Handout:** Written Contract

• **Handout:** Written Contract Guide Checklist
Types of Contracts

- Fixed Price/Fixed Fee Price
- Cost Reimbursable
- Cost Plus Fixed Price
- Maximum Allowable Cost
Competitive Proposals

• Result in either a fixed price or cost reimbursable contract

• Cost must be adequately documented
Nonprofit School Nutrition Accounts

• Must apply procurement and financial requirements when using nonprofit school nutrition account funds
Fixed Price/Fixed Fee Price Contracts

• Agreed upon amount fixed at the inception of contract
• Based on index
• Index must be
  – Auditable
  – Public
Protection

• Fixed price contracts offer SFA staff best protection against:
  – Escalating costs
  – Vendors who allow costs to climb upward quickly after award of contract

• Competitive sealed solicitations (IFB) must result in a fixed price contract, with or without adjustment factors
Cost Reimbursable Contracts

• Formal, legally enforceable contract
• Reimburses vendor for costs incurred under contract
• Does not provide other payment to the contractor, with or without a fixed fee
• Often used for Food Service Management Companies
Requirements

- Accounting system that accurately determines applicable costs to contract
- The SFA must exercise appropriate oversight
- Conducts reviews of the vendor’s cost records
- Hiring an independent auditor
SFA Oversight

• Only allowable net costs being charged to nonprofit school nutrition account

• Vendor is using efficient business practices and effective cost controls
Vendor Compliance

• Procurement requirements
• Financial management requirements for determining allowable costs
Cost Reimbursable Uncertainties

- Appropriate when uncertainties involved in a contract’s performance will not allow costs to be estimated with enough accuracy to use fixed contract pricing
SFA Retains Control

- SFA must retain control over the program
- Ensure that the vendor is meeting its contractual obligations for quality, price, and performance
- Proper contract administration
Cost Reimbursable

- SFA can only pay allowable costs from its nonprofit school nutrition account
- Respondents required to identify costs as well as discounts, rebates, and applicable credits on all invoices
- Documentation of these costs and discounts, rebates, and other applicable credits required
Cost Plus Fixed Fee Contracts

• Provides reimbursement of allowable costs plus the payment of a fixed fee to vendor

• Are often used for milk and produce
Cost Indexes

• Provides for upward and downward revision of the stated contract price

• Based on increases or decreases in labor or material cost standards or indexes in contract

• Price adjustments reflect both increases and decreases in identified index
Fees

- Clearly defined
- Promotion allowances
- Cash discounts
- Label allowances
- Rebates
- Applicable credits
- Freight rates
Vendor’s Related Costs

- Storage and distribution
- Delivery of products
- Vendor’s profit for performing services
Cost Plus Fixed Fee

• Identified in both the solicitation and contract

• Provides vendor with minimum incentive to control costs
Maximum Allowable Cost Contracts

• Provides a fixed price for the initial contract period

• Prospective price redetermination at stated times during the contract

• Subsequent periods of performance

• May be called “rollover” or “renewable”
Reconciled Actual Cost

• Fixed fee reconciled at end of year against actual cost
• School reimbursed any amount that was overpaid
• Cleared of any amount over the fixed fee
Use of Maximum Allowable Contract

• Initial fixed price is for longest period possible

• Price changes based on measurable standards or indices

• Handout: Type of Contracts Advantages and Disadvantages Summary
The Contract Award

- Ultimate communication mechanism for all involved in the supply chain
- Award components included in solicitation document
- The contract should contain fair and equal pricing for goods or services requested
- Vendor begins process to procure products once they receive the contract award
Negotiations

- Conduct negotiations with companies that submitted the top-ranked technical proposals to ensure proposals meet the team’s needs
- Ensure negotiations do not give a competitive advantage to one respondent over another
- Objective standards for balancing costs and importance of contract terms
Negotiation of Technical Needs

• Vendors may wish to modify technical proposals

• Acceptable if RFP made clear to all vendors this was permitted

• The SFA would need to re-rank the remaining proposals

• Carefully document reasons for withdrawal in the proposal
Amend Proposal

• Before SFA staff open cost proposals, ensure companies can successfully perform and meet all technical needs

• Permit company’s to amend proposal

• SFA staff must document reasons for any proposal withdrawals

• Activity: Pest Control Negotiation

• Handout: Contract Award
USDA Foods and Processing

• USDA allows the conversion of USDA Foods into convenient, ready-to-use end products

• State Distributing and Recipient Agencies eligible to participate in further processing

• USDA direct delivery – products may include fruit and whole grain pasta
Processing USDA Foods

- Occurs at the state or district level
Benefits of Processing

• Stretch USDA Foods dollars
• Increase food safety
• Reduce cash outlays for food preparation
• Reduce labor, storage and delivery costs
• Delivered from USDA vendors to processors of choice
• SFA controls receipt of end product
Processing Functions

• State Distributing Agency or school district contracts with commercial food processors.

• USDA Foods can be converted to more ready-to-use products.

• USDA purchases and delivers bulk USDA Foods to competitively procured processor.
The Value of Processing

• Reduce cost and provide more timely deliveries

• Process USDA Foods independently

• Process with the state processing program
Processing Agreements

• States may require the district's commitment to participate in the state processing program

• Provide the state agency with projections of USDA Foods plan each Spring

• **Handout:** Basic Types of USDA Foods Agreements

• **Activity:** USDA Foods Decision Making Worksheet Sample
Processed USDA Foods

- Fee-For-Service (FFS)
- Modified FFS
- Indirect discount, also known as Net-Off-Invoice (NOI)
Processed USDA Foods – Fee-For-Service

- Processors may be limited in the number of deliveries throughout school year
- Once delivered to the distributing agent, invoice is payable to the processor
- If RA is unable to accept product, they are still responsible for payment of product
Processed USDA Foods – Modified Fee-For-Service

• Distributor acts as processor’s billing agent

• Invoices the RA per pound/case price

• Excludes value of USDA Foods plus distribution fees
Processed USDA Foods – Net-Off-Invoice

- Processor sells finished product containing USDA Foods to distributor at a gross price
- Distributor sells product to an eligible RA at commercial price
- Distributor must apply refund from the processor for value of donated food
Net-Off-Invoice Example

You can receive cheese from a commercial distributor at a discount. The distributor must create a SKU for the cheese and allow sale to qualifying RA. The manufacturer and distributor work together to maintain this information.
Section 5 – Cooperative Purchasing Groups

• Topics
  – Advantages and Disadvantages of Cooperative Purchasing Groups
  – Joining a Cooperative Purchasing Group
  – Forming a Cooperative Purchasing Group
  – Group Buying Service
  – Food Service Management Companies
Cooperative Purchasing

• Group of people or entities join together to accomplish all or part of the steps in the purchasing process

• Use collective buying power to obtain highest quality products at the best price
Advantages and Disadvantages

- May produce considerable savings and improve the quality of products purchased
- May cause fewer deliveries or elimination of some specific products

Activity: Advantages and Disadvantages of Cooperative Purchasing Groups
Federal, State, and Local Regulations

- Verify cooperative purchasing group follows federal, state, and local rules, regulations, and policies governing procurement

- **Activity:** Advantages and Benefits of Joining a Cooperative Purchasing Group

- **Activity:** Disadvantages and Considerations of Joining a Cooperative Purchasing Group
Joining a Cooperative Purchasing Group

- Important to find a cooperative purchasing group that can satisfy unique needs of district

- Consider delivery schedules, product offerings, and local regulations
Determine Your District’s Needs

• Special products
• Storage capacity
• Additional equipment

• Activity: Determining Your District’s Needs Template
Group Buying Service (GBS)

- Used to refer to an organization that buys on behalf of other entities in larger quantities.
Procuring with a GBS

- For formal procurements, either the sealed bid (IFB) or competitive proposal method (RFP) must be used.

- Good or services must meet specifications in solicitation.

- Buying service must comply with all terms and conditions of solicitation.
Food Service Management Companies (FSMCs)

- Any organization that contracts with the SFA to manage any aspect of the SNP.
School Nutrition Program Management and Accountability

• Contracting with a FSMC does not relieve the SFA of its responsibility for the management of the SNPs.

• SFA remains responsible for ensuring program accountability.
PROCUREMENT in the 21st CENTURY

Adapted from the Institute of Child Nutrition

www.theicn.org
800-321-3054