

Procurement Procedures

Before approving the purchase of goods or services to be paid with Federal Funds, [REDACTED] follows these steps to ensure that the expenditure meets the Federal Allowability requirement:

The Individual or Department requesting the purchase of goods or services with federal funds must make a preliminary determination that the cost is allowable. In order to determine if the cost is allowable, the Requestor must consider the following at the pre-award planning phase.

Pre-Award Planning

1. Is the good or service allowable under the federal program? See 2 CFR Subpart E 200.400 for further guidance with respect to what is allowable.

2. Does the cost comply with federal cost principles?

- Is the expenditure necessary and reasonable for the proper and efficient performance and administration of the federal award;

- Is it allocable to the relevant federal program;

- Is the expenditure authorized or not prohibited under State or local law.

-Per 2 CFR Part Subpart E 200.403 when determining if a cost is allowable, applicable OMB cost principals, agency program regulations and the terms of the grant and subgrant agreement must be followed in determining the reasonableness, allowability and allocability of costs.

3. Are there sufficient funds available? DEC (Department of Exceptional Children) does not have to answer this question)

4. Is the cost included in an approved budget? (DEC Related Services does not have to answer this question)

DEC Related Services Only

1. Is the service an evaluation?

2. Is the service an ongoing therapy?

Cost or Price Analysis

1. Is the price reasonable based on prior similar purchases?
2. Was the price checked in catalogs or websites?
3. If applicable, were the following considered:
 - Material Costs
 - Labor Costs
 - Equipment & Overhead
 - Reasonable Profit Margins

Competitive Process

Contracts for Time & Material may only be obtained after decision that no other contract type is suitable and a ceiling exists that the contractor exceeds at its own risk.

1. Was Time & Material Contract entered?
2. What is the contract limit?
3. What is the reason for the contract?

Requestor will follow one of the subsequent processes unless one of the following exceptions applies:

1. Sole Source Vendor (attach Single Source Verification Form)
2. Emergency (attach written approval by Federal Funds (aka Title) Committee)
3. Competition Inadequate (less than 2 bids received)

Any exception to the competitive procurement process on the basis of sole source, emergency or inadequate competition must conform to the criteria established in 2 CFR Subpart D 200.318(a) & (b). Any procurement done on the basis of sole source, emergency or inadequate competition must be approved by the Title Committee.

For purchases where the exceptions do not apply:

Vendors will be identified as minority businesses, women's business enterprises and/or labor surplus area firms. Labor surplus area firms are identified by accessing this web link:
<http://ohiolmi.com/laus/laborsurplus.htm>

Purchases Between \$10,000 to \$150,000

- Is the vendor State-preferred; or lowest priced of 3 alternatives*?

Vendor: _____ Price: _____

Vendor: _____ Price: _____

Vendor: _____ Price: _____

For purchases over \$25,000 only:

- Has the vendor been excluded from federally supported contracts (check www.epls.gov to verify)

*Contract shall be awarded to the vendor with the lowest price, unless a valid reason exists, such as unique product.

Please state reason if lowest price not chosen.

Purchases Over \$150,000

1. RFP (Request for Proposal) Attached
2. Proposals Attached
3. Evaluation Committee Appointed & Conflict of Interest Disclosure Form Attached:
4. Evaluation Committee Vendor Recommendation: _____
5. Federal Funds aka Title Committee Confirmation (If Title Committee rejects recommendation, attach disagreement memorandum)
6. Vendor Chosen: _____
7. Has the vendor been excluded from federally supported contracts (check www.epls.gov to verify)
8. Contract attached

Description of Item (describe as detailed as possible and include quantity)

For Goods Only, please include the agreed upon date for delivery, if possible.

Contract Administration

Contract for Goods

1. Attach packing slip if applicable.
2. Was item received?
3. What date was the item received?
4. Did the vendor meet the agreed-to timeline?

If timeline not met, what action was taken, such as follow-up phone call, demand letter, agreed-to new delivery date or cancelled order.

5. Was the quantity received verified? If no, explain action taken.
6. Was the condition/quality of the good verified? If no, explain action taken.
7. Contract administrator should sign that he/she affirms that the correct quantity of goods were delivered in acceptable condition and with agreed upon timeframes.
8. No employee, officer, or agent of ██████ may participate in the selections, award, or administration of a contract supported by a Federal award if him or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract, per 2CFR Part 200.318 (c)(1).
9. The officers, employees, officer, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. In accordance with 2 CFR Part 200.318 (c)(1) and the Ohio Ethics Laws, ECOT employees may accept an item of nominal value. Under no circumstances should an ECOT employee solicit anything of value from a vendor associated with the proposal.

Contract for Services

Contracts for services will be evaluated by ██████ attorney and the Title Committee on a regular basis and the contract will be attached to any purchase request made.

Approvals Required:

1. For Purchases Under \$500; the PRF must be signed by a Department Head
2. For Purchases Over \$500 to \$9,999; Department Head, Financial Administrator and Title Committee Representative. Two (2) Title Committee Representatives can approve if the Financial Administrator is not available.
3. For Communications-Related Purchases: Requires approval from Communications Director or designee.
4. For Curriculum-Related Purchases: Requires approval from Curriculum Director or designee.
5. For IT-Related Purchases: Requires approval from IT Director or designee.

When detailed steps are taken and necessary approvals received, the purchase of the requested goods or services with federal funds is deemed allowable.