

Purchasing Procedures Including Federal Procurement

Effective purchasing responsibility requires planning, scheduling, research and selection both as to produce quality and source of supply. Follow-up and inspection procedures shall be used to ensure proper delivery, quality and quantity of ordered foods before they are accepted.

All supplies shall be requisitioned through the appropriate administrator. The superintendent shall be responsible for establishing procedures for the requisition of all goods and services.

No purchase orders shall be issued unless sufficient funds are available in an appropriate account or prior approval has been received.

All ordered goods, whether ordered on-line or through other methods, must have the goods shipped to a District address. Once the goods are received, a packing slip should be verified against merchandise to assure all merchandise was received, and then later included and matched with the invoice.

Competition by vendors shall be encouraged. Competition is defined as the effort by two or more parties acting independently to secure the business of the school district by offering the most favorable terms.

The building administrator or unit director shall be responsible for buying the proper product for the specified purpose without favor or prejudice.

The school district may request performance guarantees from vendors and establish administrative guidelines for implementing these guarantees.

The district shall cooperate with trade and industrial associations and governmental and private agencies in the formulation and development of sound business methods toward the fostering and promotion of fair, ethical and legal trade practices.

Soliciting price quotations

Whenever feasible, quotations should be obtained on all purchases of goods and services for the school district except for professional services, educational workbooks, textbooks, library books, expendable science and art supplies and other such items.

Price quotations and bid requirements are outlined in Policy DJE, as well as an

internal bidding policy. When it is required under bidding policy to solicit price quotes or bids, the bids or quotes shall be documented when the paperwork for payment is sent to Accounts Payable.

Federal Procurement

This policy and its accompanying regulation shall apply to the purchase of services, supplies, equipment or other property with federal funds that are subject to the federal Uniform Grant Guidance (UGG) and other applicable federal law, including but not limited to the Education Department General Administration Regulations (EDGAR) and the United States Department of Agriculture (USDA) regulations governing school food service programs. In the event this policy or its accompanying regulation conflict or are otherwise inconsistent with mandatory provisions of the UGG, EDGAR or other applicable federal law, the mandatory provisions of such laws shall control.

District employees shall follow Board policy concerning employee purchasing authority when making any purchase with federal funds and shall obtain prior Board approval in those instances when it is required by Board policy. District employees shall also follow applicable state law and Board policy concerning competitive bidding, to the extent state law and/or Board policy establish additional requirements that are not inconsistent with this policy and its accompanying regulation.

Micro-purchases (less than \$3,500)

A “micro-purchase” is a purchase that, in an aggregate amount, is less than \$3,500.

Micro-purchases may be made or awarded without soliciting competitive quotations, to the extent district staff determine that the cost of the purchase is reasonable. For purposes of this policy, “reasonable” means the purchase is comparable to market prices for the geographic area.

To the extent practicable, the district will distribute micro-purchases equitably among qualified suppliers when the same or materially interchangeable products are identified and such suppliers offer effectively equivalent rates, prices and other terms.

Small purchases (\$3,500 to under \$150,000)

A “small purchase” is a purchase that, in an aggregate amount, is \$3,500 or more, but less than \$150,000.

For small purchases, price or rate quotes shall be obtained in advance from a reasonable number of qualified sources, as detailed in this policy’s accompanying regulation, unless:

1. a valid basis exists under the federal Uniform Grant Guidance for relying on procurement by a noncompetitive proposal (i.e., “single source” procurement); or

2. the district elects to use a more formal competitive bid or request for proposal process.

Large purchases (\$150,000 or more)

A large purchase is a purchase that, in an aggregate amount, is \$150,000 or more.

The district shall conduct a cost or price analysis for large purchases that, at a minimum, includes making an independent estimate before receiving bids or proposals (including noncompetitive proposals). A cost analysis means evaluating the separate cost elements that make up the price. A price analysis means evaluating the total price, without looking at the individual cost elements.

Whenever appropriate and relevant to the specific transaction, the cost analysis may include life-cycle cost estimates which shall then be incorporated into any solicitations of bids or proposals.

Unnecessary or duplicative items

The district shall avoid the acquisition of unnecessary or duplicative items.

Consideration shall also be given to consolidating or breaking out purchases to obtain a more economical purchase.

Recordkeeping

The district shall maintain records sufficient to detail the history of procurements made with federal funds. These records may include, but not necessarily be limited to, the following: rationale for the method of procurement, contractor selection or rejection, and the basis for the contract price (including a cost or price analysis).

Retention of such procurement records shall be in accordance with applicable law and Board policy.

(Adoption date)

LEGAL REFS.: 2 C.F.R. Part 200 Subpart D (*post-award requirements under the federal Uniform Grant Guidance*)
2 C.F.R. 200.318 (*general standards for procurement supported by federal funds*)
2 C.F.R. 200.319 (*written procurement standards required*)
2 C.F.R. 200.320 (*methods of procurement to be followed*)
2 C.F.R. 200.323 (*cost or price analysis*)
2 C.F.R. 200.333 (*record retention requirements*)
2 C.F.R. 200.336 (*access to records*)
7 C.F.R. 3016.36 (*USDA's procurement standards*)
7 C.F.R. 3016.37 (*USDA's procurement requirements for subgrants*)
34 C.F.R. Parts 75, 76 (*EDGAR - Education Department General Administrative Regulations*)

48 C.F.R. Subpart 2.1 (*micro-purchase and competitive bidding thresholds*)

CROSS REFS.: BCB, School Board Member Conflict of Interest
DAC*, Federal Fiscal Compliance
DJ/DJA, Purchasing/Purchasing Authority
DJE, Bidding Procedures
DKC, Expense Authorization/Reimbursement (Mileage and Travel)
EHB, Records Retention
GBEA, Staff Ethics/Conflict of Interest

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CROSS REFS.: DJE, Bidding Procedures

Garfield School District No. Re-2, Rifle, Colorado