



Title: **Procurement**

Code: 622

Book: Policy Manual

Section: 600 Finances

Policy Statement

The Central Greene School District is committed to securing goods and services using grant funds from reputable and responsible suppliers in an equitable and competitive manner and in accordance with applicable federal and state laws, regulations and guidance.

Reason for Policy

2 CFR Part 200.317 requires that grantees and subgrantees will use their own procurement procedures which reflect applicable state (PA School Code Section 807.1) and local laws and regulations, provided that procurements conform to applicable federal law and other standards. In using federal funds for procurements, the district is bound to adhere to all of the procurement standards identified in 2 CFR Part 200.317 et. seq. If the district's procurement policies and procedures are more restrictive than state or federal laws and regulations, district policies must be followed. 2 CFR Part 200.318 includes but is not limited to the following requirements: [\[1\]](#)[\[2\]](#)

- The district will use its own procurement procedures which reflect applicable state and local laws and regulations, provided that the procurements conform to applicable Federal law and regulations.

- The district will have written selection procedures for procurement transactions.
- Any lists of prequalified persons, firms or products to be used by the district will be updated regularly and will ensure open and free competition.
- Only responsible contractors that have the ability to successfully complete contract terms will be used.
- If available and applicable, excess federal property and equipment will be used before purchasing new equipment.
- The district will ensure no real or apparent conflicts of interest arise during procurement activities.
- All transactions will be conducted in a manner providing full and open competition (See 34 CFR 80.36(c) for examples of restrictive procurement situations).
- Unnecessary or duplicative purchases will be avoided.
- District will perform a cost or price analysis in connection with every procurement action including contract modifications.
- Detailed records to substantiate procurement decisions, rationale and history will be maintained.
- The district will handle and resolve any contract or procurement disputes.
- The district must make available, upon request of the awarding agency, technical specifications on proposed procurements where the awarding agency believes such review is needed to ensure that the item and/or service specified is the one being proposed for purchase.
- Any applicable bonding requirements will be followed.
- The district's contracts must contain provisions of paragraph 2 CFR 200.326.

Policy Requirements

Purchasing procedures using federal and non-federal grant funds will conform to applicable state, local and federal law and any regulations identified in 2 CFR. Procurements may be awarded through noncompetitive means under certain circumstances such as if the goods/services are only available from a single source,

public exigency or emergency necessitates noncompetitive procurement, the awarding agency authorizes it, or if competition is deemed inadequate. See 2 CFR Part 200.320 for additional guidance on when noncompetitive procurement may be used.

Federal regulations (See 2 CFR Part 200.320) stipulate that procurements under \$150,000 may be conducted via less formal competitive procedures such as price or rate quotations. However, the district informally requires all purchases of \$100,000 or more to be procured through a formal competitive process. Therefore, federal funds will continue to adhere to the more restrictive threshold. **See GP800.2 Resolutions and LCAs for additional detail on the use of small purchase competitive selection procedures.** Any procurement in excess of \$100,000 using non-federal funds and non-competitive methods cannot be Journal Vouchered to federal funds even though such expenditure transfer might otherwise be allowable and eligible.

Procurement of goods and services using federal or non-federal grant funds must also adhere to the following district policies and procedures:

- Policy 610 Purchases Subject to Bid

- Policy 611 Purchases Budgeted

- Policy 612 Purchases not Budgeted

- Policy 613 Cooperative Purchasing

- All applicable procedures

Documentation of procurement processes should be maintained according to the district's Policy Record Retention. (Pol. 800)

Adopted: **December 06, 2016**

Legal References:

- [1. 2 CFR 200.318](#)
 - [2. 24 P.S. 807.1](#)
 - [2 CFR Part 200](#)
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