

Procurement & Grants Collaborative Training

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September 15, 2026

Fort Worth
INDEPENDENT SCHOOL DISTRICT

What is EDGAR? (Defined)

The Education Department General Administrative Regulations (EDGAR)

The Education Department General Administrative Regulations (EDGAR) are the federal regulations that govern all federal grants awarded by the U.S. Department of Education on or after December 26, 2014, to local districts (LEAs) and charters including State-administered programs. The regulations impact time and effort certifications, indirect cost reimbursement, timely obligation of funds and carryover, financial management rules, program income, record retention, property/equipment/supplies inventory controls, procurement, monitoring, conflicts, travel policies, and allowable costs. All recipients of federal grant dollars must comply with these new rules to avoid audit exposure. Effective date of July 1, 2016.

EDGAR Applied

EDGAR regulations apply to all federally funded programs including both formula and discretionary grants including, but not limited to the following:

- Title I — Title II — Title III — Title IV — Title V — Title VI — Title VII — Title VIII
- Every Student Succeeds Act (ESSA)
- ESEA Flexibility
- Head Start
- IDEA
- Workforce Innovation and Opportunity
- CTE / ROP / Carl Perkins
- National School Lunch Program
- Department of Defense Construction Grants

Application of Bid Limits

EDGAR REQUIREMENTS FOR PURCHASING GOOD AND SERVICES

Price is in the Aggregate:

- For single or individual purchases made without contract: aggregate costs means the cost of the individual purchase (One-offs)
- For contracts: aggregate costs means the total potential cost of the contract, including any option years and amendments, or the time between full procurements for the same goods/services/etc.
- Example of Categories: Office supplies; miscellaneous repairs/equipment, vehicle purchase, equipment repair services.

What is EDGAR? (Purpose)

Emphasizes internal controls to strengthen oversight over federal funds to reduce risks of waste, fraud, and abuse. Includes;

1. EDGAR Requirements for Purchasing
2. State & Federal Rules for Purchases
3. Formal Purchase Process
4. Contract Provisions & Certifications
5. P-Card / Credit Card Purchases
6. Non-competitive Award
7. Travel Policies
8. Approval of Expenditures
9. Inventory Control
10. Retention of Records
11. Written Policies and Procedures

EDGAR Procurement Requirements

All districts **MUST**:

- a. follow policies and procedures under Section 200.318-200.326
- b. Have own documented procurement procedures reflecting applicable Federal, State, and local laws and regulations.

PROCUREMENT STANDARDS

§200.318	General procurement standards.
§200.319	Competition.
§200.320	Methods of procurement to be followed.
§200.321	Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms.
§200.322	Procurement of recovered materials.
§200.323	Contract cost and price.
§200.324	Federal awarding agency or pass-through entity review.
§200.325	Bonding requirements.
§200.326	APPENDIX II - Contract provisions.

EDGAR Procurement Requirements

Edgar Procurement Thresholds

For federal awards (including those managed by the Edgar program), procurement thresholds are set by the Federal Acquisition Regulations (FAR) and 2 CFR Part 200. These thresholds determine which procurement method applies to a purchase.

Federal Thresholds (as of 2026)

- **Micro-purchase threshold (MPT):** \$15,000 (federal-wide open market).
 - Below this, purchases can be made via **micro-purchases** without competitive bidding, provided the price is reasonable and documented.
- **Simplified Acquisition Threshold (SAT):** \$350,000.
 - Between MPT and SAT, purchases use **small purchase procedures** (informal, with competitive quotes).
- **Formal procurement methods** (sealed bids or competitive proposals) apply at **\$150,000** for most federal awards

WHEN YOU NEED MULTIPLE QUOTES

Federally Funded Procurements

FEDERAL FUNDS THRESHOLDS & PROCUREMENT METHODS

Purchase Commitment Amount	Federal / EDGAR Method	Solicitation / Procurement Method	BOARD APPROVAL REQUIREMENT
\$1 to \$15,000 aggregate	§200.320(a)(1) Micro-Purchase	INFORMAL PURCHASE End User May Obtain Quote 1 Quote Required	BOARD APPROVAL NOT REQUIRED
Purchases \$15,001 to \$99,999 in the aggregate	200.320(a)(2) Simplified Acquisition	INFORMAL PURCHASE End User May Obtain Quotes 3 Price Quotes Minimum from RFP AWARDED VENDORS Or APPROVED COOPERATIVE	BOARD APPROVAL NOT REQUIRED
Purchases \$100,000 to \$350,000 Single or Aggregate Submit Specifications / SOW to Procurement ~~SVCS~~ for Solicitation through IONWAVE e-Bidding Platform	§200.320(a)(2) Simplified Acquisition Requires Specifications or Scope of Work Formal Proposal Responses Evaluation & Scoring Contract (If Necessary) Board Approval (\$250K above)	FORMAL PROCUREMENT Proposals to be Solicited by Procurement Services through IONWAVE e-Bidding Platform Purchasing Methods Options: RFQ – Proposals/Quotes from Coops RFP – An Advertised Solicitation Interlocal Contract Collaborate & Coordinate with Procurement Services to execute the Procurement process	BOARD APPROVAL REQUIRED for Purchases greater than \$250K
Purchases \$350,000 and above FORMAL PURCHASE Submit Specifications / SOW to Procurement ~~SVCS~~ for Solicitation through IONWAVE e-Bidding Platform	§200.320(b)(1) Sealed Bids and Proposals; §200.324 LEA is required to conduct cost or price analysis on all procurements.	FORMAL PROCUREMENT Proposals to be Solicited by Procurement Services through IONWAVE e-Bidding Platform Purchasing Methods Options: RFQ – Proposals/Quotes from Coops RFP – An Advertised Solicitation Interlocal Contract Collaborate & Coordinate with Procurement Services to execute the Procurement process	BOARD APPROVAL REQUIRED for Purchases greater than \$250K
SOLE SOURCE PURCHASE	Required TEA approval. Contact the Grants, Department for TEA approval Request Form.		

WHEN YOU NEED MULTIPLE QUOTES

General Funded Procurements

LOCAL/GENERAL FUNDS

Purchase Commitment Amount	State Method Education Code §44.031	Vendor Response Documentation	BOARD APPROVAL REQUIREMENT
Purchases \$1 to \$99,999 aggregate	§44.031 Informal Procurement Method	INFORMAL PURCHASE End User May Obtain Quote 1 Quote Required From Approved Vendor with Fair & Reasonable Price	BOARD APPROVAL NOT REQUIRED
Purchases \$100,000 to \$250,000 in aggregate Multiple quotes required unless Approved waiver by Procurement Services Contact Purchasing to discuss competitive requirements	TEC, §44.031 Formal Procurement 1. Competitive bidding 2. Competitive proposals 3. RFP 4. Interlocal contract 5. RFQ (Coop)	FORMAL PROCUREMENT Proposals to be Solicited by Procurement Services through IONWAVE e-Bidding Platform RFP Or RFQ (Coop) Required Requires Specifications, Formal Proposal Responses Evaluation & Scoring Contract (If Necessary) Board Approval (\$250K above)	BOARD APPROVAL NOT REQUIRED FOR PURCHASES LESS THAN \$250,000
Purchases \$250,000 and above in the aggregate	TEC, §44.031 Formal Procurement 1. Competitive bidding 2. Competitive proposals 3. RFP 4. Interlocal contract 5. RFQ (Coop)	FORMAL PROCUREMENT Proposals to be Solicited by Procurement Services through IONWAVE e-Bidding Platform Requires Specifications, Formal Proposal Responses Evaluation & Scoring Contract (If Necessary) Board Approval (\$250K above)	BOARD APPROVAL REQUIRED FOR PURCHASES GREATER THAN \$250,000
SOLE SOURCE PURCHASE	CRITERIA 1. TEC, §44.031 – Sole source allowed if existence of a patent, copyright, secret process, or monopoly,		

COMPETITIVE PROCUREMENT PROCEDURES COOPERATIVE AGREEMENTS

COMPETITIVE COOPERATIVE PROCUREMENT (METHOD AND PROCESS)

1. Procurement Services Maintains a list of Approved Cooperatives for District Administrator to utilize for the Purpose of Obtaining Quotes for certain items from Vendors approved through those Cooperatives.
2. Simply holding a Cooperative Agreement does not automatically qualify a vendor as an Approved Vendor with FWISD for the purchase of Goods & Services. Further Competition and Due Diligence tasks by the District may be necessary.
3. Purchases using Federal and State Grant monies Must be Competed, even using the Cooperative method. To qualify for a District Purchase using Federal Funds (Grants), the Vendor and the Cooperative RFP Contract must be EDGAR Compliant
4. We always utilize existing Ft. Worth ISD awarded bids and contracts as a primary procurement vehicle for purchases.

COMPETITIVE PROCUREMENT PROCEDURES

COOPERATIVE AGREEMENTS

COMPETITIVE COOPERATIVE PROCUREMENT (METHOD AND PROCESS)

5. In cases where the needed products or services are not available from a District awarded contract we will utilize cooperative agreements when possible. If so, we follow the general rule that:
- Purchases Under \$100,000 must obtain at least a quote from one of those awarded vendors.
 - Purchases Above \$100,000 must obtain three (3) quotes from approved coop vendors in order to assure we are getting the best possible price and/or value.
 - Purchases Above \$100,000 must be Solicited through the District's e-Bidding Platform (IonWave) in order to Facilitate and properly Document the process
 - Any purchase \$250,000 and over will be evaluated by Procurement Services to determine if best to utilize a Cooperative Agreement or issue an RFP.

COMPETITIVE PROCUREMENT PROCEDURES

COOPERATIVE AGREEMENTS

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COMPETITIVE COOPERATIVE PROCUREMENT (METHOD AND PROCESS)

7. **Single / Sole Source Purchases Above \$100,000 using a Cooperative Agreement**

If the Department is requesting a Sole Source or Single Proposal purchase Award, a Documented Justification/Waiver for Single/Sole Source procurement will be required.

Reason for Waiver of Competition Request. Check all Appropriate Boxes:

- Emergency Needs/Urgent Needs
- Product Brand Required – Compatible with Existing Equipment
- Warranty Repairs
- Brand Specific Purchase - No Compatible or Equivalent Product or Service
- Sole Vendor – Sole Manufacturer's Distributor
- Product/Service not on current Ft. Worth ISD RFP Award
- TEA Non-Competitive Purchase Approval

QUESTIONS

Fort Worth

INDEPENDENT SCHOOL DISTRICT