Procurement of Grant-Funded Goods and Services

Policy/Procedure

PURPOSE:
To ensure that proposals submitted for external support of research and other sponsored projects comply with College financial and/or Federal policies.

POLICY:

1. Goods and services funded by external grants shall be acquired in accordance with established College policy as set forth in the Financial & Business Affairs Policy Manual, and any additional restrictions imposed by the sponsor.

2. The procurement of goods and services under federal funding shall follow the Uniform Guidance for federal awards (CFR 200.316-200.326) which allows five methods of procurement by which Dickinson College will abide, as outlined below:

   1. Micro purchases – Purchases of up to $10,000
      a. Must be distributed equitably among qualified suppliers
      b. May be purchased without soliciting competitive quotes if the college considers the price of the good or service to be reasonable
      c. Dividing purchases that would otherwise qualify as $10,001+ in order to avoid further requirements is prohibited if the transaction is for the same purpose at the same time of procurement

   2. Small purchases – Purchases between $10,001 and $250,000
      a. Competitive quotes must be obtained from at least three different sources
      b. Quotes may be obtained directly or from sources such as websites or fliers and be retained for documentation purposes
      c. The lowest quote from the supplier who can provide adequate goods and service is to be selected for purchase

   3. Sealed bids: $250,001+
      a. Two or more qualified bidders required
      b. Bids must be publicly solicited from at least two known suppliers
      c. The lowest bidder who can provide adequate goods and service for the contract is to be awarded

   4. Competitive proposals: $250,001+
      a. Used when sealed bids are not appropriate
      b. Requests for proposals must be publicized identifying all factors of evaluation and their importance to the proposal
      c. Must be solicited from at least three qualified sources
      d. Written policy must be made for evaluation of proposals and selection
e. Ideal proposal wins based on above referenced written policy of evaluation

5. Noncompetitive, sole source procurement:
   a. Must meet one of the following four requirements
      i. Item or service is only available from one source
      ii. Emergency situation requires immediate purchase that cannot be delayed for the process of soliciting competition
      iii. Federal awarding agency or pass-through entity authorized noncompetitive proposals at the request of the college
      iv. After solicitation of a number of providers, only one source was determined adequate to meet the needs of the project

Additionally, all sole source procurements require documented price/cost justification.

3. Dickinson will follow the Uniform Guidance (2CFR 200), which states the following requirements regarding conflicts of interest for all methods of procurement.

   “No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he 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.”

4. The Sponsored Projects Group, in consultation with the Office of the Provost and Dean and General Counsel as appropriate, is responsible for the negotiation, preparation and administration of subawards where a material portion of the scope of work or supported activity is to be accomplished by another institution or organization.
Related Information

Policy: Procurement of Goods & Services
Policy: Facilities and Administrative (F&A) Costs

History/Revision Information

Responsible Division/Office: Sponsored Projects Group; Financial Operations
Effective Date: December 26, 2013
Last Amended Date: 8/1/2019
Next Review Date: 8/1/2022
Also Found In: