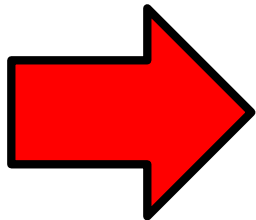




In accordance with [2 C.F.R. § 200.319](#), all procurement transactions must be conducted in a manner providing full and open competition consistent with the standards of this section.

Procurement Methods Grouped into 3 Categories

NSGP award amounts qualify under Informal Procurements



Informal
CFR 200.320(a)

- Micro-Purchases
- Small Purchases

Formal
CFR 200.320(b)

- Sealed Bids
- Competitive Proposals

Non-Competitive
CFR 200.320(c)

- Non-Competitive Proposals



Informal

[2 C.F.R. § 200.320\(a\)](#)

- Micro-Purchases
- Small Purchases

Micro Purchases § 200.320(a)(1)	Small Purchases § 200.320(a)(2)
<ul style="list-style-type: none"> • Purchases up to \$10,000 • Price/Rate Quotations Not Required 	<ul style="list-style-type: none"> • Purchases \$10,001 to \$250,000 • 3 Price/Rate Quotations is <u>Best Practice</u>
<ul style="list-style-type: none"> • Reasonableness of Price/Rate must be documented <p>Reasonableness can be determined by research, experience, purchase history or other information</p>	<ul style="list-style-type: none"> • Maintain all procurement records, these include but are not limited to: <p>WHO – List of vendors WHEN – Dates WHAT – Quotes received WHY – Reason for selection of vendor</p>



- All procurement activities must be conducted using written procedures that comply with 2 C.F.R. §200.318 – 200.327
- If there is any conflict between the procurement procedures used and the Federal procurement standards, you **must follow the more restrictive provision**
- Procurement procedures must meet the minimum requirements of:
 - Procedures must be documented
 - Price/Rate quotations from an adequate number of qualified sources for procurements over \$10,000 (or a lower threshold as set in the procedures being used – whichever is more restrictive)
 - Retention of all procurement records



For Procurements Greater than \$25,000

You must verify that the vendor is not suspended or debarred from participating in federal grant awards - prior to making a purchase or entering into a contract for services. It is strongly recommended that you use licensed contractors.

Visit the Federal Excluded Parties List System, under the [System for Award Management](#). Enter the vendor's name and federal identification number (or individual's social security number).

Download a screenshot that shows the result "No Records Found" and place it in your grant binder.



Contract Provisions

- Contracts must contain the applicable provisions described in [Appendix II to Part 200 of the CFR](#)
- [Contract Provisions Guide](#)
 - This document helps recipients and Subrecipients understand which clauses are required for their contracts and includes sample language for those clauses.



It is required that each Subrecipient have written standards of conduct covering conflicts of interest in procurements and contracting, [Title 2 CFR §200.318 \(c\)\(1\)](#). The non-Federal entity must maintain written standards of conduct covering conflicts of interest and governing the actions of its employees engaged in the selection, award and administration of the contract.

No employee, officer, or agent may participate in the selection, award, or administration of a project supported by a Federal award if he or she has a real or apparent conflict of interest. The standards of conduct must provide for disciplinary actions to be applied for violation of such standards by offers, employees, or agents of the non-Federal entity. Please see Title 2 CFR, Part 200 for the full language of the requirement.



In accordance with [2 C.F.R. § 200.112](#), in order to eliminate and reduce the impact of conflicts of interest in the Subaward process, recipients and pass-through entities must follow their own policies and procedures regarding the elimination or reduction of conflicts of interest when making Subawards.

Subrecipients must disclose to their Program Representative, in writing, any real or potential conflict of interest as defined by the federal, state, local, or Tribal statutes or regulations, which may arise during the administration of the NSGP Subaward within five days of learning of the conflict of interest.

- The Conflict of Interest policy must include any disciplinary actions for violations.
- Per federal regulations found in [CFR 200.318\(c\)](#), the standard of conducts covering conflict of interest must include disciplinary actions for noncompliance.