



POLICY AND PROCEDURE

TITLE:	Policy on the Usage of Federal Grant Funds (Uniform Guidance)
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POLICY STATEMENT:

This policy applies to all expenditures funded by Federal Grant or Contract monies.

Objectives

- Establish guidelines for compliance with the Federal Office of Management & Budget Uniform Guidance
- Ensure the most economical solutions for federally-funded purchases, and avoidance of unnecessary spending
- Establish documentation requirements necessary to prove compliance with this policy

PROCEDURE DETAILS:

Determination of Cost

When determining the cost of procurement, management should view volume purchases of identical products at the cost of one individual item. For example, if purchasing 50 identical laptops, management should use the cost of one laptop when determining the value that will dictate the required method, thereby eliminating any need to alter order or invoicing quantities to meet the below requirements.

Purchases of Items Costing \$3,500 or Less (\$10,000 or Less if CARES Act)

- Departments should follow standard Goodwin University purchasing procedures

Purchases of Items Costing between \$3,500.01 and \$150,000 (\$10,000.01-\$250,000 if CARES Act)

- Items purchased in this price range that can reasonably be described as being in the normal course of business for the University should be purchased following standard purchasing procedures, with the added requirement of obtaining at least one but preferably two comparative prices from other potential suppliers. This requirement can be met by taking a screenshot of a reputable online supplier's price of the identical product. For example, if purchasing an item from Amazon.com in this price range, the employee should obtain screenshots of the prices offered by Walmart.com and Target.com. If the employee does not opt to buy from the lowest price provider, an explanation as to

the qualitative factors that support this decision should be supplied to Finance. Alternative means of verifying price comparisons can include emails from potential suppliers, photos from a physical store, or a detailed quote/proposal. Infrequently purchased items should have documentation of the above referenced quotes at each purchase, repetitive purchases should have this process documented at least once every two years.

- Items purchased in this price range that can reasonably be described as being outside the normal course of business must follow the procedures detailed below.

Purchases of Items Costing Greater Than \$150,000 (\$250,000 if CARES Act) (or referred from second bullet point in prior section)

- **Recommended Procedure**

- Competitive Proposal Method

- Management must submit a formal request for quote/proposal to at least three potential contractors/suppliers. The Request for Quotation (RFQ) may be publicized, or may be judgmentally sent to specific contractors/suppliers based on management's knowledge of the marketplace and past experiences with area contractors.
 - In determining a winning proposal, management should choose the proposal deemed most advantageous to the program, with cost being one of the factors. Should management choose the lowest cost option, no further documentation is needed as it can be reasonably assumed that other factors did not outweigh the cost factor. Should management choose an option other than the lowest cost, documented rationale must be provided to Finance describing the qualitative factors that led to the decision.

- **Other Acceptable Procedures**

- Noncompetitive Proposal Method

- Management may utilize this method (also known as sole source procurement) under the following circumstances:
 - The item is available only from a single source.
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
 - The federal awarding agency (or pass-through entity) expressly authorizes this method in response to a written request from the non-federal entity
 - After solicitation of a number of sources, competition is determined inadequate
 - Management must document why a noncompetitive proposal method was selected

- Sealed Bids

- Under this method, formal solicitation is required, and the contract is awarded to the responsible bidder who conformed to all material terms at the lowest price.
 - Use of this method should be rare and discussed with the VP of Finance prior to usage, as management must follow the specific guidance of 2 CFR 200.320, including documenting all steps followed.

Other Requirements

- When awarding a contract equal to or greater than \$25,000, management must ensure the contractor is not on the Sam.gov debarred contractor listing. This can be done by visiting sam.gov, clicking the “Search Records” tab, and then using the search bar to find the named entity. A screenshot must be taken at this time and saved for audit verification purposes.
- Management should take all reasonable steps to fairly consider minority and women-owned businesses when making procurement decisions
- The department who is responsible for administering the contract is responsible for ensuring there is documentation of compliance with all the aspects of this contract, including support for the procurement method chosen.
- For any construction or facility improvement contracts exceeding the Simplified Acquisition Threshold, the University must ensure the federal interest in the project is properly secured. Goodwin can secure any interest in a contract with a value that is less than the sum of \$1 million, plus the unused portion of all available lines of credit at time of the award. Any contracts awarded in excess of this amount must follow the bonding requirements described in 2 CFR 200.326.

Conflicts of Interest

- This policy defines “conflict of interest” as: “the actual or apparent improper influence of a personal relationship on a business decision.”
- Management should seek to avoid conflicts of interest in all procurements involving Federal Grants or Contracts
- In the rare circumstance where this is not possible, the award decision must be approved by the conflicted person’s immediate supervisor, or other appropriate member of leadership as determined by the VP of Finance.
- Should the conflict be present at the level of the President of the University, one of the following three individuals must be informed of the award decision with adequate time to object and overrule if necessary: Chair of the Board of Directors, Chair of the Audit and Risk Committee, or Chair of the Budget and Finance Committee.

PUBLISH POLICY STATEMENT (CLICK ON BOX NEXT TO OPTION-SELECT ALL THAT APPLY):

UNIVERSITY CATALOG

STAFF HANDBOOK

FACULTY HANDBOOK

STUDENT HANDBOOK

DEFINITIONS:

NA.

EXCLUSIONS:

NA.

OFFICES DIRECTLY AFFECTED BY THE POLICY:

Goodwin University, Inc. and Subsidiaries

HISTORY: Policy Creation Date: May 2021

EFFECTIVE DATE:	May 2021
RESPONSIBLE OFFICE (ONLY ONE):	Finance
REVIEW DATE:	Annually

APPENDIX:

None