Purchasing With Federal Grant Funds

Federal funds used for purchases and subawards must comply with the Procurement Standards included in OMB Circular A-110, sections .40 – .48 and meet the procurement requirements specific to those individual sponsor award terms and conditions.

The Principal Investigator has the primary responsibility for ensuring that financial transactions are reviewed, approved and are in compliance with the terms of the grant and the federal/state cost principles. The Purchasing Office serves as an additional review for compliance and assistance with cost principles.

The Purchasing Department is required to retain back-up documentation, such as bids, quotes, and cost/price analyses on file for Federal auditors.

Overall Procurement Guidelines:

- Recipients of Federal grant(s) should avoid purchasing unnecessary items.
- Where appropriate, an analysis should be conducted of lease and purchase alternatives to determine which would be the most economical and practical procurement for the Federal Government.

Goods/Services Selection Criteria:

- The Principal Investigator (P.I.) should obtain a clear and accurate description of the technical requirements for the material, product or service to be procured. In competitive procurements, such a description shall not contain features which unduly restrict competition.
- RFP(s) issued to vendors should contain requirements which the bidder must fulfill and all other factors to be used in evaluating bids or proposals.
- Whenever practicable, RFPs should contain descriptions of technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
- RFPs should include the specific features of “brand name or equal” descriptions that bidders are required to meet when such items are included in the solicitation.
- To the extent practicable and economically feasible, a Buyer or end-user should emphasize preference of products and services dimensioned in the metric system of measurement.
- To the extent practicable and economically feasible, a Buyer or end-user should emphasize preference for products and services that conserve natural resources and protect the environment and are energy efficient.
Grant Purchases

Barnard College requires some form of price or cost analysis be made for every purchase to ensure a fair and reasonable price. Such analysis is reflected in recorded competitive quotes and proposals. Buyers should make an effort to use and verify Barnard discounts, check market prices, review past purchase orders for similar items, and demonstrate good business practices.

Grant Purchases $3,000 and over:

For grant purchases that exceed the small purchase threshold fixed at 41 U.S.C. 403 (11) (currently $3,000), Barnard College requires written records reflecting:

- Basis for vendor selection
- Three (3) quotes/bids
- Justification letter for lack of competition when competitive bids or offers are not obtained, and
- Basis for award cost or price.

Sub-Awards and Contracts - Debarment and Suspension

Definitions:

Debarment Certification: A statement from a vendor or service provider that their company, and it's principals have not been debarred, suspended, proposed for debarment, declared ineligible, are not in the process of being disbarred, or are voluntarily excluded from conducting business with a federal department or agency of the federal government.

The website to see if a vendor is on the government list of debarred vendors go to sam.gov

Sub-awards and contracts will not be permitted with parties that are debarred, suspended or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

The Principal Investigator (P.I.) is responsible for checking the Excluded Parties List System (EPLS) website prior to the approval of federal sub-awards or contracts of any amount, or purchases of $3,000 or higher on federal awards. This information is documented in the Purchasing Office.

The Procurement Standards have been updated in the Uniform Guidance (2CFR200 §200.317-200.326) and will be implemented effective beginning July 1, 2018. The College will continue to follow the Procurement Standards included in OMB-110 until the new Uniform Guidance Procurement Standards are in effect on July 1, 2018.