

Procurement for Federal and State Sponsored Awards Under Uniform Guidance

Date: May 2016

Policy Statement

Seton Hall University is responsible to follow Uniform Guidance General Procurement standards (§200.318), when procuring goods and services with federal and state funds. The University also 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 contracts. No 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.

Secondly, the University is bound to use one of the methods of procurement outlined in §200.320

The following policy applies to federal and state funded grants, contracts, subawards, etc. Additionally, this policy addresses institutional responsibilities and assists Principal Investigators (PIs) and administrators to ensure that Uniform Guidance procurement standards are followed.

Reason for Policy

OMB Uniform Administrative Requirements, General Procurement Standards for Federal and State awards (2 CFR 200) ("Uniform Guidance"), specifically §200.318 and §200.320, requires the University to follow one of the following methods of procurement:

- Procurement by micro-purchases. Acquisition of supplies or services, the aggregate dollar amount does not exceed \$3,000.
- Procurement by small purchase procedures.
- Procurement by sealed bids (formal advertising).
- Procurement by competitive proposals.

Sole-source purchases for federal and state grants have stricter requirements than standard university policy as outlined below.

Who Must Comply

All Principal Investigators and (PIs) and administrators at Seton Hall University within all schools, units, divisions, University-wide initiatives, and centers, who are involved with the procurement of goods and services for federal and state sponsored awards must comply with this policy.

Procurement Procedures

Purchase Orders

- Three quotes will be required for all single purchases over \$3,000.

(Regardless of how many items.)

- Sole source vendors require appropriate justification according to the applicable university procurement policy.
- Procurement will assist grant personnel with obtaining quotes.
- Any purchase requiring quotes will require the setup of a purchase order.
- The three quotes will be attached to the purchase requisition or it will not be processed.
- The capital equipment threshold is \$5,000. Three quotes will be required when purchasing capital equipment. The setup of a purchase order will be required.
- Purchase of computers and equipment under \$5,000 will be treated as supplies.

Credit Cards

- For purchases on federal and states grants, the PI should obtain a grant credit card (separate from the university credit card) through grants accounting and procurement.
- Grant credit cards cannot be used for purchases over \$3,000. Attempted grant credit card purchases over \$3,000 may result in the loss of the grant credit card.
- A single purchase over \$3,000 may not be “split” into multiple invoices for the purpose of circumventing this policy. Such splitting will result in the immediate loss of purchasing privileges.
- University credit cards cannot be used for purchases on federal and state grants. Transferring expenses from University credit cards to grant funds is no longer be permissible.
- Use of personal credit cards is prohibited.

University Preferred Vendors

- Purchases of both supplies and capital equipment should be made using university preferred vendors whenever possible.
- Use of other vendors, with exceptions below for E&I Cooperative vendors and State contract vendors requires justification according to university procurement policies.
- In seeking bids and quotes, university preferred, E&I Cooperative and state contract vendors should be considered first.
- University Preferred Vendors have all gone through a bidding and vetting process initiated by the SHU Procurement Department.
- A complete list of University Preferred Vendors can be found on the Procurement Department website at <https://www13.shu.edu/offices/procurement/preferred-vendors.cfm>

E & I Cooperative Vendors

- The University is a member of the E & I Cooperative.
- E & I Cooperative vendors have all gone through the bidding and vetting process initiated by the Cooperative.
- A complete list of E & I Cooperative vendors can be found on the Procurement Department website at <https://www13.shu.edu/offices/procurement/preferred-vendors.cfm>.

State Contracted Vendors

- State contracted vendors have all gone through the bidding and vetting process initiated by the State of New Jersey.
- SHU personnel will be given state contracting pricing when it is requested of the vendor.
- State Contracted vendors can be found on the Procurement Department website at <https://www13.shu.edu/offices/procurement/preferred-vendors.cfm>.

Additional Resources

Related Documents

OGRS website

Procurement Website

OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200)

Contacts and Subject Matter Experts

- OGRS
- Procurement
- OGA