

# Purchasing With Federal Grant Funds

Purchases funded by federal grant funds must adhere to regulations found in OMB Circular A-110. Circular A-110 explains administrative requirements for colleges, universities, hospitals, and other non-profit organizations with federally funded grants and agreements. OMB circular A-110 section e\_40-48 identifies required procurement standards. View detailed requirements at [whitehouse.gov](http://whitehouse.gov).

Purchases made with Federal funds are reviewed for compliance with the Federal Acquisition Regulation and the Office of Management and Budget Circular A-110. 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:

- A Buyer or an end-user 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 \$5,000 and over:**

For grant purchases that exceed the micro purchase threshold fixed at 41 U.S.C. 403 (11) (currently \$5,000), Barnard requires written records reflecting:

- basis for vendor selection,
- minimum of three (3) bids/proposals/quotes,
- 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 debarred, 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](http://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 Purchasing Dept. is responsible for checking the Excluded Parties List System (EPLS) website prior to the approval of federal subawards or contracts of any amount. This information is documented in the Purchasing Office.