OVERVIEW TO PROCUREMENT USING FEDERAL AWARDS

The University is responsible for following Federal guidelines and requirements when purchasing all goods and services using Federal funds. This is a brief overview of requirements for the procurement and contracting process.

Procurement Method:
- Total cost of purchase per good or service dictates the method of procurement. Purchases must follow Federal and/or University bid policies, whichever is lower (eCFR §200.320). Reference the guideline for WMU and Uniform Guidance Procurement Standards Guide.
- Existing inter-entity, local or state contractual agreements may be used (eCFR §200.318(e)).
- Sole source justifications must meet one of four Federal criteria (eCFR §200.320(f)).

Procurement Requirements
- Purchases should not be made for unnecessary or duplicative items (eCFR §200.318(d)).
- Federal excess and surplus property should be considered in lieu of purchasing new items (eCFR §200.318(f)).
- Detailed history of the procurement process for each purchase must be maintained (eCFR §200.318(i)).
- Certain procurements must be publicly advertised.
- Procurements must allow for full and open competition (eCFR §200.319).
- All possible steps must be taken to use small and diverse businesses (eCFR §200.321).

Vendor Requirements
- Contracts or purchase orders are prohibited to any vendor or individual where a conflict of interest exists (eCFR §200.318(c)) according to the University’s Conflict of Interest Policy.
- Contracts or purchase orders are prohibited to any vendor or individual on the government wide list of debarred or suspended vendors, tracked by the System for Award Management (eCFR §200.213).

Contract Award
- With few exceptions, the University must select the lowest cost vendor or contractor that meets the required quality standards (eCFR §200.318(d)).
- Cost or price analysis must be performed in accordance to Federal requirements for certain level purchases (eCFR §200.323).

Contract Language: Specific contract terms and conditions are required for the vendor contract or purchase, depending on the total cost (eCFR Appendix II to Part 200, §(A) and §(B); eCFR §200.326, 15 eCFR 14.48(a)).

Contract Administration
- Oversight must be maintained by the University to ensure contractors perform in accordance with requirements set forth in the contract or purchase order (eCFR §200.318(b)).
- The University is responsible for managing all contractual and administrative issues arising out of procurements (eCFR §200.318(k)).
- The University must be willing and able to provide documentation regarding procurement and contracts to the Federal agency, upon request (eCFR §200.324).