



WESTERN MICHIGAN UNIVERSITY

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](#)).