

Louisiana Department of Education

Procurement Updates in the Uniform Grants Guidance 2015

The procurement standards are a component of Subpart D, Post-Award Requirements, and are contained in Sections 200.317 through 200.326 of the Uniform Grants Guidance. Five procurement methods are outlined in Section 200.320 of the Uniform Grants Guidance. These sections describe the applicable procurement standards, the methods of procurements that are allowed, and listings of specific items that must be included within contracts under federal awards. These reforms require the non-Federal entity to use its own documented procurement procedures which reflect applicable state and local laws and regulations, provided that the standards also conform to applicable federal laws and standards. See the chart below for procurement methods.

Procurement Documentation at a minimum should include:

- The rationale for the method of procurement,
- Selection of the contract type,
- Contractor selection or rejection, and
- Basis for the contract price.

REQUIRED ACTION:

- All non-Federal entities must ensure that their internal procurement policies reflect the changes described in the Uniform Grants Guidance. It is important that a recipient's procurement policies identify the five allowable methods outlined in Section 200.320 and summarized in the chart attached.
- Review Appendix II to ensure your organization's contracts include the required specifications.

REQUIRED ACTION:

Required Conflict of Interest Policies (section 200.318): Two types of mandatory conflict of interest language each non-Federal entity must have:

- Employee Conflict of Interest - Ensure your organization's current employee conflict of interest policies include the required language in section 200.318 of the Uniform Grants Guidance.
- Organizational Conflict of Interest - Ensure that your organization has a mandatory organizational conflict of interest policy that conforms to the Uniform Grant Guidance.

Attachment

Procurement Methods	Federal Requirement	State Requirement	Action required
Micro Purchases (only new method)	Purchases less than \$3,000 No competitive process required.	Purchases less than \$5,000 No competitive process required.	Use more restrictive federal threshold of \$3,000.
Small Purchases (informal)	\$3,000 - \$150,000 Price or rate quotation from adequate number of qualified sources.	Purchases less than \$5,000 No competitive process required.	Use more restrictive state requirement.
		\$5,000 - \$15,000 Solicit 3 or more quotes.	Use more restrictive state requirement.
		\$15,000 - \$25,000 Solicit 5 or more quotes.	Use more restrictive state requirement.
Sealed Bids (formal advertising)	Exceeding \$150,000 Publicly bid and award to lowest responsible bidder.	Exceeding \$25,000 Refer to LA Procurement Code (R.S. 39:1551-1736)	Use more restrictive state requirements.
Competitive Proposals	Exceeding \$150,000 Request for Proposal from adequate number of sources; must have written method for selecting recipients.	Exceeding \$25,000 Refer to LA Procurement Code (R.S. 39:1551-1736)	Use more restrictive state requirements.
Noncompetitive Proposals – Sole Source Purchases	Appropriate only when: Available from a single source; Public emergency; Expressly authorized by awarding or pass-through agency in response to written request from LEA; After soliciting a number of sources, competition is deemed inadequate. Must be adequately documented.		