



Hardesty Public Schools

Home of the Fighting Bison

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Procurement General Policies and Procedures

I. PROCUREMENT

Procurement of goods and services for the Hardesty Public School District must be conducted in an open and competitive environment to ensure that prices paid are fair and reasonable. Purchasing

activities are conducted in the school business office. Purchasing activities include

obligations for proper transaction documentation, fiscal responsibility, ethical behavior,

adherence to federal and state government regulations, and compliance with the school

Policies. The school business office provides support to the school in the selection, acquisition, use

and disposal of goods and services by: A. Maximizing the school's purchasing power by focusing on strategic sourcing and obtaining the best value.

B. Leveraging its expertise in contract negotiations and supplier management to

advantage the school.

C. Streamlining processes and investing in new technologies to provide

administrative efficiencies.

D. Ensuring that purchases are made in accordance with all applicable school

policies, laws, regulations, codes and ordinances.

E. Minimizing risk exposure while maintaining flexibility in procurement activity.

II. PROCUREMENT AUTHORITY

The procurement of goods and services is the responsibility of the school business office.

As a result, the school business office is responsible for assisting school units in the

procurement process and for overseeing all procurement activities.

Only the school business office has the authority to negotiate and sign agreements.

However, it is the responsibility of the school unit to:

A. Understand and uphold the school's obligations under the agreement.

B. Understand and oversee the supplier's performance and notify the school business

office of any significant performance issues.

School units do not have the authority to change agreements; only the school business

office may do so, and only after diligent review. Contact the school business office to

request a change or extension. The Hardesty Public School District requires special approval for and/or

prohibits the purchase of certain goods and services. These restrictions come from various units across

the school. Special approval does not exempt a transaction from the remainder of the procurement

policy, including the competitive bid process. It is the school unit's responsibility to be aware of restrictions on the purchases of goods or services. If a school employee has questions about whether an item is restricted, the school business office should be contacted before the purchase is made.

III. ETHICAL CONDUCT

Care must be taken to avoid the intent and appearance of unethical practice in relationships, actions and communications. All procurement activities conducted on behalf of the school must be in compliance with the standards outlined in federal, state and local laws; and school policies. It is the responsibility of each faculty and staff member of the school to ensure that the school does not knowingly enter into any purchase commitment that could result in a conflict of interest. Units with questions about a particular situation should contact the school business office. The school business office is the ultimate decision maker on whether a procurement-related activity has the intent or appearance of unethical practice. The school business office may require individuals involved in supplier proposal evaluations or contract activities to sign confidentiality agreements and/or conflict of interest disclosures.

The school business office is charged with the responsibility of maintaining an open and competitive process for procuring goods and services. Bids and proposals from competing suppliers will be evaluated by the school business office which will also

award contracts. As part of their stewardship responsibilities, departmental end users are encouraged to compare prices between suppliers even when the purchase amount does not require a formal bidding procedure. An open and competitive purchasing environment requires that information pertinent to the bidding process be kept confidential until the conclusion of the process.

A. CONFLICTS OF INTEREST

The school is particularly diligent before entering into purchasing contracts with its employees, their family members or any other individual who would be perceived as having a potential conflict. Situations in which a supplier affiliated with a school employee is seeking a contract with the school to provide the same or similar services that the employee provides in his or her position as a school employees require special attention because of the high risk of a conflict. School employees should not make purchasing decisions or otherwise influence the Hardesty school's decisions to do business with any supplier affiliated with the school employee, a relative of the school employee or any other individual who would be perceived as a potential conflict.

School employees must promptly disclose in writing all actual or potential conflicts to a designated school official as actual or potential conflicts arise or are identified. Similarly, the designated official must disclose in writing all actual or

potential conflicts to the school business office. If found to be significant, the conflicts must be eliminated or managed. School employees who are unsure whether a conflict exists are encouraged to contact the school business office for help in determining whether disclosure is appropriate.

When purchasing with federal sponsored funds additional Uniform Guidance conflict of interest requirements apply.

B. GRATUITIES FROM SUPPLIERS

School employees should neither solicit nor accept money, loans, credits, entertainment, favors, services or gifts from current or prospective suppliers. Such gratuities, even if of seemingly low value, can give rise to a conflict of interest or the appearance of a conflict of interest. In particular, school employees should never accept gratuities from a current or prospective supplier that has submitted or may submit a bid for a school contract for which a bid solicitation is being contemplated, developed or is actively accepting bids. If it is deemed necessary to visit a supplier site for a demonstration, the school pays all related expenses.

C. CONFIDENTIALITY

School employees must handle confidential or proprietary information with due care and proper consideration of ethical and legal ramifications and governmental regulations. School employees may not tell outside parties the prices, terms, or

conditions quoted by other suppliers. The school business office must pre-approve

all communications with outside parties regarding potential or anticipated

procurement-affiliated relationships.

IV. PURCHASING THAT REFLECTS THE SCHOOL'S VALUES

Diversity, social responsibility and environmental sustainability are central to the

school's mission. The school is committed to providing business opportunities to

suppliers who help the school honor these values.

EXAMPLE – Please modify to make the policies and procedures applicable to your district.

V. DONATIONS AND CONTRIBUTIONS

School resources are to be used to further the school's mission. School employees with

questions about whether a transaction constitutes a donation should direct questions to the

school business office. The school business office must approve any donations.

VI. TAXES

School purchases are not subject to sales and use taxes when used for educational and

charitable purposes.

VII. FINANCIAL CONTROLS

Financial controls provide reasonable assurance of the effectiveness and efficiency of

operations, compliance with laws and regulations, and reliability of financial reporting.

Procurement internal controls focus on ordering, approving, receiving, and reconciling.

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Each school unit should have the appropriate policies and procedures in place to provide for adequate controls in each of these steps within the procurement process and must separate among two or more people the duties of these steps; whenever possible, there should be no direct reporting relationship among these individuals.

VIII. PROCURE-TO-PAY PROCESS

All purchases of goods and services must be done in an open and competitive environment to ensure that the prices that the school pays are fair and reasonable. For any federal grants, the school will follow the the micro-purchase threshold and the simplified acquisition threshold based on 2 C.F.R. § 200.320(a)(1)(iii). Currently, the micro-purchase threshold is \$10,000 and the simplified acquisition threshold is \$250,000. Below is an outline of the appropriate steps to take each time a purchase is made. While the school business office involvement is required for some of these steps, its staff can assist with any steps. Note that purchases of \$10,000.00 or more must also follow the competitive bid process, as described in the section below.

A. DETERMINE NEEDS

The first step in the purchasing process is to determine the need. The specifications, performance standards and/or scope of work should be outlined.

These items should be general in nature to allow for sufficient competition in meeting them; they should neither reference nor be written specific to a particular

brand, model or company.

B. IDENTIFY POTENTIAL SOURCES

The Hardesty Public School District requires and encourages competition among suppliers in providing goods and services to the school. Competition provides the greatest opportunity for the school to procure goods and services at the best value. Accordingly, those involved in supplier selection have the responsibility to search broadly and completely for viable suppliers. Sources for the goods or services should be considered in the following order:

1. Supplier with a Strategic Contract

Strategic Contracts are contracts with suppliers that have been through a competitive process and the terms have been secured at the best value.

These suppliers provide goods and services with favorable terms for pricing, delivery and other factors and thus are the preferred source for purchasing goods or services from external entities. The school business office should be contacted before placing large-quantity orders off of Strategic Contracts, as the orders may be eligible for additional discounts.

2. Other Supplier

When neither of the aforementioned sources offers the goods or services that the unit needs, the school business office should be contacted to

identify other suppliers. To the maximum extent practicable, the school

will distribute micro-purchases equitably among qualified suppliers.

3. Check Federal Exclusion List

An exclusion record identifies parties excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non Financial assistance and benefits. Exclusions are also referred to as suspensions and debarments.

For any federal grants the procurement method will meet the requirements in 2 C.F.R. § 200.320(a)(1)(ii)

C. COLLECT QUOTES AND SELECT BEST VALUE

It is generally good practice to price transactions and collect quotes from a variety of sources before selecting one. 2 C.F.R. § 200.320(a)(2) The lowest price may not always be the best value; units should consider the total cost of ownership, which includes the purchase price, transportation, handling, inspection, quality,

Hardesty Public School District rework, maintenance, disposal and other associated costs. Units should purchase from responsible sources possessing the ability to perform successfully under the terms and conditions of the university with consideration given to such matters as supplier integrity, compliance with public policy, record of past performance, and financial and technical resources. For purchases under \$10,000, department end users should obtain pricing from the supplier before creating a Purchase

Order. Purchases of \$10,000 or more must follow the competitive bid process, as described in the Competitive Bid Process section below.

D. PLACE THE ORDER

The school employees must order goods or services using the purchase requisition process. A purchase order offers the school the best legal and financial protections. The school business office should be contacted before any repetitive purchases are made with a purchase order.

The purchase order is the mechanism that places the order with the supplier and provides a method for payment of the invoice; goods and services should not be obtained prior to the supplier receiving the purchase order. The order quantities, pricing and payment schedule on the purchase order should be established in the same way as the supplier will invoice.

E. RECEIVE THE GOODS OR SERVICE

School units have a number of responsibilities related to receiving goods and services. The school's system of internal controls requires that the proper separation of duties in completing these tasks, i.e., different individuals perform the various functions of the procurement process. Persons who are authorized to procure goods and services may not approve those transactions or be connected to the payment of those transactions.

It is school's practice to have suppliers' direct shipments to either the location of the departmental end user or to an appropriate receiving point. Suppliers may only direct shipments to either a school address or other school-approved location.

Contact the school business office for help in choosing the appropriate address for receiving goods.

Upon receipt, the school unit should immediately inspect the shipment to be sure that it is correct, complete and not damaged.

1. If there are any order-related problems, including discrepancies in pricing or amount, incorrect or missing items, etc. the supplier should be contacted immediately.

2. If the goods are damaged, save all materials and the shipper should be contacted to come and inspect the items.

3. If either of these situations arise or if there are delivery or supplier performance issues, contact the school business office before the payment terms expire to request a hold on payment. Once an invoice is paid, the ability to provide assistance in resolving disputes is diminished.

If there is a problem with goods or services received and they were purchased through a contract, then the school business office can provide assistance in

resolving disputes with suppliers. For supplier performance tracking, school units

should notify the school business office of any significant supplier performance

issues.

Finally, the school unit is responsible for returning items that need to be returned

and for verifying that the proper credit is received.

F. INVOICING AND PAYMENT

The school business office is responsible for processing the payment of goods and

services to suppliers in compliance with school's policies and standard processes,

external regulations and legal requirements. It is standard process for suppliers to

send invoices directly to the school's business office. Suppliers that send invoices

to school units may experience delays in payment. If a school unit receives an

invoice, it should be scanned immediately and a copy of that invoice should be

emailed to the school business office.

When a school unit approves a payment, it is attesting that it received the good or

service, where applicable; that the payment amount is correct; that the payment

should be made; and that the payment is business appropriate.

G. RECONCILE STATEMENTS

Hardesty Public School District units must reconcile their statements on a timely basis to:

1. Verify the business appropriateness of each transaction.

2. Confirm that all purchases were allowable and within budget and spending

limits.

3. Ensure proper reporting of payments to suppliers.
4. Resolve any errors as soon as possible.
5. Check that proper credits have been made.
6. Ensure that the appropriate buying method was used.

As part of this process, the statement should be matched to the purchase order and packing slip or other documentation that documents the transaction.

H. MAINTAIN RECORDS

The school business office must maintain records for all transactions for a minimum of three years.

IX. COMPETITIVE BID PROCESS

School policies require that all transactions \$10,000 and greater be competitively bid.

Competitive bidding is the process that allows the school to properly survey the marketplace and secure goods and services at fair and reasonable prices. It helps ensure that the school receives goods and services of the best value while also satisfying federal, state and school requirements. The school business office is the authorized organization to conduct the competitive bid process. For transactions less than \$10,000, units may request the school business office to conduct a competitive bid process.

Splitting a transaction into smaller dollar amounts, delaying, staggering purchases, and

using multiple staff members to purchase the same or related items to avoid the competitive bid processes are serious policy violations. All transactions found to be in violation of the school's competitive bid process will be reported as unauthorized purchases. Employees responsible for violating transaction(s) may be subject to disciplinary action up to and including termination.

Although the school business office conducts the competitive bid process, school units have responsibilities as well. Upon request, the school business office will assist school units with any of their responsibilities related to the competitive bid process.

A. SUBMIT SPECIFICATIONS

School units must outline and submit to the school business office the detailed specifications, performance standards and/or scope of work of the goods or services needed. These items should be generic in nature to allow for sufficient competition in meeting them; they should neither reference nor be written specific to a particular brand, model or company. If a supplier's assistance is required to develop the bid specifications that supplier cannot submit a bid without approval of the school business office and all materials gathered or prepared must be shared with all potential bidders.

B. SOLICIT BIDS

Informed by the specifications that the school unit provides, the school business

office develops and issues a Request for Proposal (RFP) to solicit bids from suppliers. Each supplier receives the same directions, information, terms and conditions. The school business office only considers valid those submissions from suppliers that meet the bid requirements and are sent to the school business office by the specified deadline.

C. EVALUATE PROPOSALS

The school business office works with the school unit to assess each proposal to determine which represents the best value to the school.

An open and competitive purchasing environment requires that information related to the bidding process be kept confidential; school employees must conduct themselves ethically, as described above, at all times. Suppliers must contact the school business office to obtain bid results.

For any federal grants the procurement method will meet the requirements in 2 C.F.R. § 200.320(b).

D. NEGOTIATION THE AGREEMENT AND MAKE THE AWARD

The school business office is the only university department with the authority to negotiate and sign procurement contracts.

X. SOLE SOURCE PROCESS

The federal government, our granting agencies and other stakeholders, expect the school

to make purchases in an open and competitive environment to ensure that the school receives fair and reasonable pricing. Because a sole source process doesn't include a survey of the marketplace nor competition among suppliers, it makes it difficult for the school to meet these expectations. Despite these drawbacks, there are some situations in which a sole source process is in the best interest of the school:

A. If only one supplier provides the good or service.

B. If an emergency purchase is necessary to avoid or mitigate a significantly disruptive event. In such a case, school units must first contact the school business office to approve the purchase.

For any federal grants the procurement method will meet the requirements in 2 C.F.R. § 200.320(c)

When submitting a request to deviate from the standard competitive bid process, the school unit must explain in writing why the sole source supplier is the only acceptable choice. Goods or services available from more than one supplier are subject to the competitive bid process described above.

The school units must not create or attempt to create sole source situations through delay or other manipulation of the procurement process. The school business office will work with units to determine whether a sole source situation exists and, in such cases, reserves the right to negotiate pricing or solicit additional information.

XI. SUPPLIER MAINTENANCE

Suppliers and school units may request the creation, update or inactivation of a supplier record, and the school business office will work with them to determine whether such a change is appropriate.

XII. BEST PRACTICES

The school continually strives to improve its practices to ensure the integrity and effectiveness of its procurement processes.

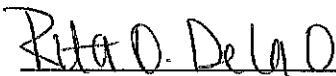
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Approved by:



Clinton Martin, Board President



Rita De La O, Board Clerk