

Title	Procurement Policy
Policy Statement	<p>This policy outlines who has the authority to enter into transactions and payments on behalf of the College. It also outlines the procedures for the procurement of goods and services that meet College needs at the lowest possible cost consistent with the quality needed for the proper operation of the various departments. It empowers faculty, administrators, staff, and students to make prudent purchasing decisions in their areas of responsibility within budget constraints.</p> <p>Grinnell College strongly encourages best practices for purchases made with non-federal funds.</p> <p>The Federal Uniform Guidance mandates that purchases made with federal funds follow specific procedures. Grinnell College requires all purchases made with federal funds to follow these procedures.</p> <p>All purchases made with an external funding source must comply with all terms and conditions of the funding source.</p> <p>If direction differs between this policy and external regulations, sponsor, or donor terms, or other internal policy or procedures, the more restrictive instruction will apply.</p>
Who Needs to Know this Policy	<p>This policy applies to all Grinnell College faculty, administrators, staff, and students involved with the procurement of goods and services essential for College operations. This includes all purchases regardless of payment method.</p>
Procedures	<p>For all Purchases, Regardless of Funding Source</p> <p>Conflict of Interest</p> <p>Grinnell College employees have an obligation to conduct College-related business transactions and other duties assigned to them without actual or potential conflicts of interest. In accordance with this policy, employees shall take all necessary precautions to avoid any actual or potential conflicts of interest and to disclose any actual or potential conflicts that may exist.</p> <p>A conflict of interest arises when an employee or contractor providing services to the College may benefit personally from dealings with an entity or person conducting business with the College, including indirect benefits such as to family members or businesses with which the person is closely associated. A conflict of interest also</p>

arises when the personal interests or relationships of an employee or contractor may compromise the individual's professional judgment in the discharge of College duties and responsibilities. Please familiarize yourself with the [Grinnell College Employee Conflict of Interest Policy](#).

The presence of a conflict of interest does not mean we cannot do business with a particular vendor. All employees with an actual or potential conflict of interest shall complete a [Conflict of Interest Disclosure Statement](#) at the earliest practicable time so that the conflict may be reviewed and resolved. All statements should be forwarded to the Human Resources department.

For Purchases with All Funds other than Federal

Delegation of Authority

I. Contract Review and Approval Process and Contract Signature Authority

Contract signature authority is necessary in order to ensure contractual agreements meet the College's legal compliance requirements, and to avoid contractual obligations not in the best interests of the College.

A contract is considered anything with terms and conditions and requires a signature on behalf of the College. All contracts for goods and services, regardless of dollar amount, need to be reviewed and approved by the Procurement Manager before being signed. Please allow for at least two weeks in your timeline for this review process. Additional time is frequently needed for more complex contracts, or contracts requiring extensive negotiations with the vendor.

All technology and software related contracts will go through a "Technology on Campus" review and approval process before they can be signed. Please contact the Procurement Manager to start this review and approval process and allow at least four weeks for this review process. On occasion, vendor contracts including policies on data security and privacy are deemed inadequate and therefore puts the College at risk. In these circumstances, additional time is often required to modify the contract to the College's satisfaction.

Contracts may not be approved to be executed if upon negotiations with the vendor we are unable to reach a mutual agreement and the risk profile is too high for the College.

All grant agreements need to follow the notice to submit process with Corporate Foundation & Government Relations Office.

The Vice Presidents and the Dean of the College can sign all contracts obligating the College to any vendor with a value under \$10,000.

The Vice President for Finance and Treasurer of the College (or, if absent, the Assistant Treasurer) must sign all legal contracts including, without limitation, those that obligate the College to any vendor with a value of \$10,000 or higher.

In some cases, the contract may be referred to legal counsel for review.

Employment Offer Letters are handled through Human Resources. Faculty employment contracts are handled through the Dean's Office.

Students can have purchasing authority for a student organization; however, no students may enter into a contract on behalf of the College or student organizations.

Copies of all fully signed contracts must be filed with the Procurement Manager.

	Under \$10,000	≥\$10,000
Contract	Vice Presidents; Dean of the College	VP for Finance & Treasurer of the College

II. Approval of Invoices

When individuals order goods and services, they should direct vendors to send the corresponding invoices directly to their attention. Invoices must be signed by an authorized signer indicating approval of payment, and coded with the fund, cost center, and object code (account number) to be charged. The authorized signer is someone who is granted permission by the *Budget Officer to approve charges against the budget. If you have questions on who the authorized signers are for your cost center please contact Accounts Payable.

- Under \$25,000 – Requires those granted permission by the Budget Officer.
- \$25,000-\$49,999 – Requires the signature of the Vice President or Dean of the College.
- \$50,000 and above – Requires the signature of the Vice President for Finance and Treasurer of the College (or, if absent, the Assistant Treasurer).

Principal Investigators (PIs) must approve consultant and sub-award invoices.

There may be exceptions on occasion for large contractual purchases. Approval for any exceptions must be obtained through the Procurement Manager.

	Under \$25,000	\$25,000 - \$49,999	≥\$50,000
Invoice	Budget Officer; Authorized Delegates	Vice Presidents; Dean of the College	VP for Finance & Treasurer of the College

*The Budget Officer is the person that has been designated as the person in charge of that budget.

Purchasing Procedure

I. Vendor Selection and Buying Requirements

While price is not the only determinant, price plays a very important role in purchasing. As a general rule, the higher the expenditure, the more care must be taken to plan and execute a careful procurement strategy. The College recognizes that departments have specific expertise in their area and may wish to do their own price checking or write their own bid. Departments can choose to do it themselves, or work in conjunction with the Procurement Manager using a team approach.

Buying Requirements (for Goods and Services)

For purchases under \$10,000

Formal documentation of vendor selection is not needed. Buyers are expected to conduct an informal cost/price analysis and select the vendor offering the best mix of quality, service and price for the specified good or service. Reasonable efforts shall be made to ensure fair and competitive pricing.

For purchases from \$10,000 to \$24,999

A minimum of three (3) bids or proposals written or verbal, are required, if qualified vendors are available. Each vendor must be given equal opportunity to provide pricing on the same set of specifications. Web price lists and catalogue listings are considered written or verbal bids.

For purchases \$25,000 and over

A minimum of three (3) **written** bids, or proposals, are required. Each vendor must be given an equal opportunity to provide pricing on the same set of specifications. Written bids can be received by mail or email and need to be signed/e-mailed by an authorized representative of the vendor.

See section II Obtaining Competitive Bids below

Important Notes:

The competitive bid requirements can be waived when utilizing any of the consortiums shown in section III.

Purchases cannot be broken into smaller transactions in order to avoid the competitive bid requirements.

Buying Requirement Guide

	Under \$10,000	\$10,000 - \$24,999	≥\$25,000
Consideration of multiple vendors	No	Yes	Yes
Acceptable forms of bids/proposals	N/A	verbal, published catalogues, written	written only

Recurring Purchases

When working with recurring purchases such as office supplies, toner, bottled water, paper, print services, copier services, etc., please contact the Procurement Manager for preferred vendors.

Emergency Purchases

Emergency purchases are those required to protect life and/or property or to prevent substantial economic loss or the interruption of service. Formal procedures will be

waived but competitive bids should be used where possible. An emergency purchase shall be limited in scope and duration to meet the emergency.

Purchasing Card

The Grinnell College Purchasing Card is provided as a convenient means with which to make purchases. A Purchasing Card is a charge card issued to an employee for the purpose of making authorized purchases. The Purchasing Card is the College's preferred method of payment. Each month the Purchasing Card bill is sent directly to the College for payment and an informational statement is sent to the cardholder to acquire authorization and retain documentation of the purchases. The cardholder is required to maintain documentation supporting the purchases made with the card and follow all internal control procedures.

II. Obtaining Competitive Bids

Solicitations for goods and services should include the following:

- A clear and accurate description of the technical requirements for the material, product, or service desired. The description shall not be designed to limit competitive solicitation from qualified vendors.
- Requirements that the bidder must fulfill and all other factors to be used in evaluating bids and proposals.
- A description of the technical requirements in terms of functions to be performed or performance required, including the range of acceptable characteristics or minimum acceptable standards.
- The specific features of "brand name or equal" descriptions that bidders are required to meet.
- Preference, to the extent practical and economically feasible, for products and services that conserve natural resources and protect the environment and are energy efficient.

The College also works with National Association of Educational Procurement (NAEP) which gives the College access to NAEP's large request for proposal (RFP) library. Please contact the Procurement Manager with your specific RFP requirements.

Single/Sole Sourcing

Competitive bids may be waived only under one of the following circumstances:

- Products or services can be obtained from only one person or firm.
- Competition is precluded because of the existence of patents, copyrights, confidential processes, proprietary information or other such conditions.
- Competitive bids are solicited and no responsive bid is received.
- Need for specially designed replacement parts or specialized technology.
- Continuation of an existing service contract.
- Purchases made through an established consortia contract.
- Emergency purchases as defined above.

III. Consortiums

Grinnell College belongs to a number of consortiums that offer many discounts for goods and services. Consistent use of these consortium contracts will save time and effort and result in better pricing. **The competitive bid requirements are waived when utilizing any of these consortiums.** These are the main consortiums the College works with. If you would like to use another consortium, or need help in using those listed below, please contact the Procurement Manager.

E&I Cooperative - www.eandi.org

Description: E&I is the member-owned, not-for-profit sourcing cooperative delivering expertise, solutions, and services to the educational community.

Examples of Goods & Services Provided: Photographic Equipment; Digital Imaging Services; Online books, media and related software; Library Supplies & Equipment; Life Sciences Product & Services; Computer Hardware, Software & Peripherals; Medical, First Aid, Athletic Training Supplies; Rec Athletic Equipment Supplies & Services; Microscopes & Accessories; Office Supplies; Lab Sterilizers, Washers & Bedding Dispensers; Adv. Analytical Scientific Research/Equipment Services & Supplies; Facility & Maintenance, Repair, Operations; Vehicle Auto Truck Parts.

Sourcewell Cooperative - <https://www.sourcewell-mn.gov/cooperative-purchasing/contracts-vendor-search>

Description: Sourcewell, formerly known as NJPA, is a municipal national contracting agency. Sourcewell's cooperative contract purchasing leverages the national purchasing power of more than 50,000 Government, Education, and Non-Profit agencies.

Examples of Goods & Services Provided: Athletic Surfaces & Equipment; Science & Lab Equipment; Facility & Maintenance, Repair, Operations; Food Service Equipment; Exercise & Rehabilitation Equipment; Athletic & Medical Supplies; Uniforms & Apparel; Facility & Maintenance, Repair & Operations; Vehicle Auto Truck Parts.

Omnia Partners - <https://www.omniapartners.com/publicsector>

Description: OMNIA Partners is the largest and most trusted purchasing organization for public sector procurement. They have brought together the nation's two leading cooperative purchasing organizations – National IPA and U.S. Communities – under one roof to form OMNIA Partners, Public Sector.

Examples of Goods & Services Provided: Athletic Equipment; Athletic Supplies & Uniforms; Science & Lab Supplies; Uniform & Work Apparel; Automotive Parts; Food Equipment & Supplies; Maintenance, Repair & Operations; Fitness Equipment; Sports

Surfaces; Photographic Equipment, Medical Equipment & Supplies, Performing Arts Apparel & Equipment.

Club Quarters Hotel Discounts - www.clubquartershotels.com

Description: Members of Club Quarters Hotels save on business travel to major U.S. cities, as well as London. To book your preferred member rates online, please visit <https://clubquartershotels.com/grinnell>. Reservations may also be booked by calling Member Services at +1.203.905.2100 or +44 (0)20 7451 5800, the GDS, or your online booking tool.

IV. Centralized Purchasing

In some instances purchases for the College are required to be done centrally and not by an individual department.

Furnishing purchases

In order to ensure buildings across campus are consistent in quality and the ambiance of the building is maintained, carpeting, furniture, furniture accessories and paint/wall coverings must be purchased through Facilities Management. This includes purchases related to ergonomic needs.

Technology purchases

All purchases of computer hardware and software must be approved by Information Technology Services (ITS). This is to ensure that the proposed technologies

- are compatible with College systems;
- can be supported appropriately;
- are priced most competitively;
- meet the required compliance, data security, privacy, and related specifications; and
- do not already exist at the College.

All technology purchases must comply with the appropriate ITS policies.

Software (and its respective maintenance and support contracts) is purchased through ITS, but not necessarily paid from an ITS budget.

Prior to purchase approval, software must have an identified funding source for the life of the product.

ITS has project management expertise available to help with technology selection, purchase, and/or implementation.

Stationery purchases

In order to maintain institutional identity and brand standards, the Grinnell College stationery items must be ordered through Total Choice Shipping & Printing. This

includes: business cards, letterhead and second sheets (including Monarch), and business envelopes. Order by using the [online store front](#).

Please contact the Communications Office for login information.

V. Insurance

If there is a contractual relationship that includes manual labor to be performed on Grinnell College's premises the College has insurance requirements that need to be met. Please contact the Procurement Manager for those requirements.

This does not include: Speakers or Consultants.

VI. Purchasing Initiatives

Supplier diversity

The College is committed to developing mutually beneficial relationships with small, minority-owned, women-owned, disadvantaged, veteran-owned, and local business enterprises. We also want to expand supplier diversity to include those suppliers that are proactive about changing the social norms and excel in social responsibility. This creates diversification in the College's contractor pool through increased opportunities for suppliers who have not worked directly or indirectly with the College.

Sustainable procurement

When possible, the purchaser should consider environmental impact in purchasing decisions. The use of products and services with less environmental impact should be considered favorably when it is a best value decision to do so. Factors included in the decision are: energy efficiency; shipping materials (returnable, reusable, or made from recycled content); and environmental performance of the supplier/producer (waste prevention, waste reduction, pollution prevention, clean air/water programs, and other initiatives).

Local procurement

The College also encourages inviting local businesses to bid on goods and services. Vendors are selected from their ability to serve the needs of the College in the area of product price and quality. When price and quality of the locally stocked product are competitive with the same product elsewhere, the College supports buying locally.

VII. NAEP Code of Ethics

Grinnell College subscribes to the National Association of Educational Procurement (NAEP) Code of Ethics. This Code states that buyers will:

- Give first consideration to the objectives and policies of my institution.
- Strive to obtain the maximum value for each dollar of expenditure.
- Decline personal gifts or gratuities.

- Grant all competitive suppliers equal consideration insofar as state or federal statute and College policy permit.
- Conduct business with potential and current suppliers in an atmosphere of good faith, devoid of intentional misrepresentation.
- Demand honesty in sales representation whether offered through medium of verbal or written statement, an advertisement, or a sample of the product.
- Receive consent of originator of proprietary ideas and designs before using them for competitive purchasing purposes.
- Make every reasonable effort to negotiate an equitable and mutually agreeable settlement of any controversy with a supplier; and/or be willing to submit any major controversies to arbitration or other third party review, insofar as the established policies of my institution permit.
- Accord a prompt and courteous reception insofar as conditions permit to all who call on legitimate business missions.
- Cooperate with trade, industrial and professional associations, and with governmental and private agencies for the purpose of promoting and developing sound business methods.
- Foster fair, ethical and legal trade practices.
- Counsel and cooperate with NAEP Members and promote a spirit of unity and a keen interest in professional growth among them.

For Purchases with Federal Funds

Purchases made with Federal Funds must comply with Uniform Guidance 2 CFR 200 Administrative Requirements, Cost Principles, and Audit Requirements for Federal awards. The Uniform Guidance requirements can be found here:

https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr200_main_02.tpl

General procurement standards

The non-Federal entity must use its own documented procurement procedures which reflect applicable State, local, and tribal laws and regulations, provided that the procurements conform to applicable Federal law and standards. Where State and/or local requirements conflict with Federal requirements, the strictest requirement, will be followed.

Methods of procurement to be followed

Purchases >\$250,000

A formal proposal process with written proposals is generally required for federal purchases greater than \$250,000 for non-sole source purchases. Proposals must follow competitive procurement guidelines (or sealed bids if construction). A competitive proposal requires a formal Request for Proposal (RFP) be publicly advertised. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Obtain Debarment and suspension documentation

Purchases of any amount from certain parties that are debarred, suspended, or otherwise excluded from, or ineligible for participation in Federal assistance programs or activities cannot be charged to federal funds. It is a requirement to check for suspended or debarred parties before awarding work for all covered transactions. Debarred or suspended parties may be found by searching the System for Award Management (SAM) for exclusion records, active or excluded at www.sam.gov documentation of the results of searches must be retained with procurement and grant records. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Contract provisions

Grinnell College contracts must contain the applicable provisions described in Appendix II to Part 200—Contract Provisions for non-Federal Entity Contracts Under Federal Awards. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Domestic preferences for procurement / Buy America Preference for Infrastructure

As appropriate and to the extent consistent with law, Grinnell College should provide a preference for the purchase, acquisition, or use of goods, products, or materials produced in the United States (including but not limited to iron, aluminum, steel, cement and other manufactured products). Refer to 2 CFR 200 of the Uniform Guidance for more information.

Contracting with small and minority businesses, women's business enterprises, and labor surplus area firms

Grinnell College must take all necessary affirmative steps to assure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in paragraphs (1) through (5)

Contract Cost and Price

Grinnell College must perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, Grinnell College must make independent estimates before receiving bids or proposals. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Avoid wasteful or duplicative purchases

Uniform Guidance requires Grinnell College to consider ways to prevent the purchase of unnecessary or duplicative items. In addition, when possible, purchasers should compare the costs of leasing versus buying, and assess the feasibility of consolidating, breaking our purchases or sharing product or service to reduce overall costs. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Bonding Requirements

For construction or facility improvements exceeding the Simplified Acquisition Threshold, the Federal awarding agency or pass-through entity may accept the bonding policy and requirements of Grinnell College provided a determination is made that the Federal interest is adequately protected. If such a determination is not made, other requirements must be followed. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Prohibition on certain telecommunications and video surveillance services or equipment

Use of federal funds is prohibited to procure or obtain equipment, services or systems that uses covered telecommunications equipment or services as a substantial or essential component of any system or as critical technology of any system. Covered telecommunications equipment is telecommunications equipment produced by Huawei Technologies Company or ZTE Corporation (or any subsidiary or affiliate of such entities). Refer to 2 CFR 200 of the Uniform Guidance for more information.

Federal Awarding Agency or Pass-Through Entity Review

Grinnell College must make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed procurements. Examples of documentation that may be requested include pre-procurement review, procurement documents, request for proposals or independent cost estimates. Refer to 2 CFR 200 of the Uniform Guidance for more information.

Record Retention Requirements

For purchases with sponsored funds, Grinnell College must maintain records sufficient to detail the history of procurement. Principal Investigators and Program Directors are responsible for maintaining grant records and providing records when requested. Typically, federal sponsored records must be kept for seven years after the final financial close on the award, some sponsors may require longer retention periods. Records to be maintained include:

1. Rationale for method of procurement (informal quotes, formal written quotes, sole source, etc.).
2. Vendor selection or rejection process.
3. Basis for contract price (cost/price analysis, lease vs. purchase analysis).

Review Cycle

This policy will be reviewed and modified if necessary every two years, or as deemed necessary, by the Treasurer’s Office.

Adopted by Grinnell College August 1, 2019.

Last Revised by Grinnell College February 1, 2023.