

University of Health S

e managed with good administrative practices and sound business judgement.

all procurement actions at Roseman University . including procurement of
es under any extramurally-funded * d other Federal + grants .
nd sponsored projects.

Buyers have the responsibility of utilizing University resources in an ethical and lawful manner. Any Roseman employee with purchasing responsibilities for their unit or a federal award should refer to this policy to ensure compliance.

Any questions regarding purchasing with Roseman funds should be directed to the Purchasing Coordinator. Questions regarding purchasing with federal or sponsored funds should be directed to the Grants Administrator.

I. GENERAL PROCUREMENT STANDARDS

The University is required to document the procurement steps and activities required for operations. This includes what type of purchasing method is used, contract type, price and the basis for contractor selection. A purchase order may be used as appropriate documentation. The Business Office is responsible for keeping all contract records (See section I.B. “Record of Procurement History”).

Each Unit Heads has authority over the approved budget for his/her respective unit. If a Unit Head is unavailable to approve

Federal or non-federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report.

C. Disclosure of Conflicts of Interest/Code of Ethics

Roseman University maintains a Conflict of Interest/Code of Ethics policy. (See University Handbook). In addition, all Roseman employees, including those participating in sponsored projects must adhere to the following:



Small Purchases

For all small purchases, written price or rate quotations must be obtained from at least two, but preferably three qualified sources unless the provisions outlined in the section entitled “Sole Source Procurement” are met.

Purchase orders are recommended for all small purchases.

For small purchases, using Federal funds, the System for Award Management (SAM) at

noncompetitive proposals are allowed, provided the procedures outlined in section I.B.iii are followed.

i) Sealed Bid Process

The sealed bid process method is the preferred method for procuring construction. Bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the in

- € Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not contain features which unduly restrict



€ Contracts must be awarded to the responsible firm whose proposal is most advantageous to the program, with price and other factors consistent; and Roseman may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are potential source to perform the proposed effort.

iii) Noncompetitive Proposals—Sole Source Procurement process

Noncompetitive proposals are procurements are those obtained through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:

- € The item is available only from a single source;
- € The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- € The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from Roseman; or,
- € After solicitation of a number of sources, competition is determined inadequate. If this method of procurement is used, a Sole Source Justification form is required.



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€ Roseman University may use time and material type contracts only after a determination that no other contract is suitable and if the contract includes a

Vendor Selection and Competition

Buyers are encouraged to focus on the most valuable solution during the purchasing process. To avoid loss of productivity, sometimes the lowest cost is not the most efficient selection, so good management and best judgement are required for proper stewardship of University funds. Look for shared services or ask about purchasing consortiums to foster greater economy and efficiency.

All procurement transactions must be conducted in a manner providing full and open competition. Roseman University must take all necessary affirmative steps to assure that small and minority businesses, women's business enterprises, and labor surplus area firms are used when possible. Affirmative steps must include:

- € Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- € Assuring that small and minority businesses and women's business enterprises are solicited whenever they are potential sources;
- € 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;
- € Establishing delivery schedules, where the requirements permits, which encourage participation by small and minority businesses, and women's business enterprises;
- € 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
- € Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in this section.

B. Federal Award Procurement Procedures

Roseman must not use any vendor or contractor that restricts competition. Some of the situations to avoid that are restrictive to competition but are not limited to:

- € Placing unreasonable requirements on firms in order for them to qualify to do business;
- € Requiring unnecessary experience and excessive bonding;
- € Noncompetitive pricing practices between firms or between affiliated companies;
- € Noncompetitive contracts to consultants that are on retainer contracts;
- € Organizational conflicts of interest;
- € Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance or other relevant requirements of the procurement; and
- € Any arbitrary action in the procurement process.

Appendix I

Definitions for Federal Awards

Cost Principles: establishes standards for the allow ability of costs, provide detailed guidance on the cost accounting treatment of costs as direct or indirect costs, and sets forth allow ability and allocability principles for selection items of cost.

Equipment: tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost of \$5,000, or as otherwise established by the Roseman University for financial statement purposes.

(Roseman University current capitalization level: \$1,000 with a useful life of more than 3 years)

Micro-purchase: a purchase of supplies or services using simplified acquisition procedures, the aggregate amount of which does not exceed the micro-purchase threshold. Micro-purchase procedures comprise a subset of a non-Federal entity's small purchase procedures. The non-Federal entity uses such procedures in order to expedite the completion of its lowest-dollar small purchase transactions and minimize the associated administrative burden and cost. The micro-purchase threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions). It is \$10,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation.

Principal Investigator – PI: An investigator (normally an academic appointee) who has primary responsibility for the scientific and technical conduct, reporting, fiscal and programmatic administration of a sponsored project.

Sole Source Procurement:

- € Direct labor hours charged at fixed hourly rates that reflect wages, general and administrative expenses, and profit.

Total Purchase Price: cost of product or service, including shipping, handling and installation.

Value Engineering: a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

Appendix II

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of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704,



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Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier up to the non-Federal award.

(K) See §200.322 Procurement of recovered materials.