

## PROCUREMENT GUIDELINES

### BACKGROUND

These guidelines are intended to ensure that Boston VA Research Institute, Inc. (“BVARI”) resources are used properly in purchasing activities. Consistent adherence to the guidelines provides reliability and assurance that all purchasing activities relating to acquisitions, contracts, and third-party arrangements meet regulatory requirements, including Office of Management and Budget (“OMB”) 2 CFR §200.317 through §200.327 for purchases made on federally-funded sponsored awards as well as sponsored award terms and conditions.

### APPLICABILITY

These guidelines apply to purchases of goods and services using BVARI’s funds or on BVARI-administered sponsored awards. These guidelines are not intended to apply to independent contractors established as part of the separate **Independent Contractor Policy** when all criteria in the **Independent Contractor Questionnaire** has been met.

### VENDOR SELECTION

Whenever possible, all individuals purchasing using BVARI’s funds or on a BVARI-administered sponsored award should purchase goods and services from a BVARI preferred vendor. All newly established vendors must be established in accordance with the **New Vendor Policy** which includes verification that a vendor is not suspended or debarred by the Federal government.

Requesters should consider the following with each expenditure request:

- Consider ways to prevent the purchase of unnecessary or duplicative items by assessing the feasibility of consolidating, breaking out purchases or sharing a product or service to reduce overall costs
- Consider support of small business, veteran-owned small business, veteran-owned small business, service-disabled veteran-owned small business, HUBZone small business, small disadvantaged business, and women-owned small business concerns

### PROCUREMENT REQUIREMENTS

For all purchases of goods and services  $\geq$ \$25,000, a **Vendor Justification Form** is required as follows:

- 1) **Purchases of goods and services  $\geq$ \$25,000 up to \$250,000** require written quotations (or verbal quotations with supporting written documentation) from at least three (3) qualified vendors. If there are fewer than three (3) qualified vendors, the reason must be documented.
- 2) **Purchases of goods and services  $\geq$ \$250,000** generally require a formal proposal process with written proposals for non-sole-source purchases. For purchases on federally-funded sponsored awards, proposals must follow competitive procurement guidelines outlined in OMB 2 CFR §200.317, 200.318, 200.319, and 200.320 including conducting a formal written proposal process where vendor selection should be awarded to the bidder whose proposal is most advantageous to the program with price being one of the factors.

Noncompetitive procurement can be used for purchases on federally-funded sponsored awards if one or more of the following circumstances apply:

- Purchase is <\$25,000;
- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
- The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity; or
- After solicitation of a number of sources, competition is determined inadequate.

**MANAGEMENT OVERSIGHT**

In the event the recipient of vendor goods or services is unsatisfied with the performance from a vendor, the recipient will notify BVARI Management to take appropriate action with the vendor to remedy or terminate in accordance with any applicable contract terms.

**RELATED RESOURCES**

- *Expenditure Request Form*
- *Financial Internal Control Procedures*
- *Independent Contractor Policy*
- *Independent Contractor Questionnaire*
- *New Vendor Policy*
- *New Vendor Setup Request Form*
- *Vendor Justification Form*

**REVISION HISTORY**

<b>Revision Letter</b>	<b>Author</b>	<b>Revision Date</b>	<b>Description of Changes</b>
A	Denise Moody	10/2022	New