

Procurement of goods and services with funds from grants and cooperative agreements awarded by the Federal government under Uniform Guidance

The Office of Management and Budget (OMB) introduced a single document known as Uniform Guidance (2 CFR 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards) that superseded several circulars promulgated by OMB that became effective on December 26, 2014. The Research Foundation transitioned to the Procurement Standards (2 CFR 200, sections 318 – 326) outlined in UG on July 1, 2018.

Section 200.320 details the methods that must be used when procuring supplies, services, or other property (tangible/intangible). Purchases must be reasonable, allowable, and allocable to the sponsored project that will be charged. In addition, they must:

- Comply with the RF's documented procedures;
- Provide open competition to the extent required by each method;
- Comply the RF's Conflict of Interest Policy; and
- Be necessary and properly documented.

The five methods are summarized below:

1. Micro Purchase: aggregate transaction amount not exceeding \$10,000
 - Competition is not required; however, price reasonableness must be demonstrated
 - Purchases should be distributed equitably among qualified suppliers to the extent possible
2. Small Purchase Procedure: aggregate transaction amount between \$10,000.01 up to \$250,000
 - Informal procurement method used to purchase services, supplies, or other property
 - Price or cost analysis is not required
 - Price or rate quotation must be obtained from at least two (2) qualified sources
3. Sealed Bidding: aggregate transaction amount greater than \$250,000
 - Formal procurement method that must be advertised (ex. Invitation for Bids)
 - Require written bids from three (3) qualified sources
 - A price or cost analysis is required
 - A firm fixed price contract is awarded to the lowest responsive and responsible bidder
4. Competitive Bidding: aggregate transaction amount greater than \$250,000
 - Formal procurement method used when Seal Bidding is not applicable
 - Must be publicized/advertised and include evaluation methods (ex. Request for Proposal)
 - Require written bids from three (3) qualified sources
 - A price or cost analysis is required
 - A fixed price or cost-reimbursement type contract is awarded to the responsible firm whose proposal is most advantageous to the program/project, with price and other factors considered.
5. Noncompetitive proposals: aggregate transaction amount greater than \$10,000
 - Procurement through solicitation of a proposal from only one source and may be used only when one or more of the following circumstances apply:
 - i. The item is available only from a single source;
 - ii. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
 - iii. The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or
 - iv. After solicitation of a number of sources, competition is determined inadequate.
 - Transactions greater than \$250,000 require a price or cost analysis.

Principal Investigators can initiate procurement transactions independently of the RF for orders totaling under \$5,000. For orders totaling \$5,000 and above, the RF must initiate the transactions on their behalf. Please submit a completed Purchase Requisition Form along with the required number of quotes and supporting documentation to PO@rfcuny.org for processing. For Independent Contractor Agreements, Memorandum of Understanding, and Subawards, please submit your request using the Research Foundation's Contract Manager System.

Aggregate Purchase Threshold	Purchase Method	Key Summary Points	Price/Cost Analysis
Up to \$10,000.00	Micro Purchase	<ul style="list-style-type: none"> Not competitively bid. Must demonstrate price reasonableness. Should be equitably distributed among qualified suppliers to extent practicable. 	No
\$10,000.01 to \$250,000.00	Small Purchase Procedure	<ul style="list-style-type: none"> Require informal bids from two (2) qualified suppliers. Must be documented. 	No
Greater than \$250K	Sealed Bidding	<ul style="list-style-type: none"> Formal bidding process. Require written bids from three (3) from qualified suppliers. Awarded to supplier with lowest bid that meets requirements. 	Yes
Greater than \$250K	Competitive Bidding	<ul style="list-style-type: none"> Formal bidding process. Used when Sealed Bidding is not applicable. Require written bids from three (3) from qualified suppliers. Awarded to supplier whose proposal is the most advantageous to the program/project. 	Yes
All Values	Noncompetitive Bidding	<ul style="list-style-type: none"> Price/Cost Analysis required for transactions greater than \$250,000. Completed Competitive Bid Waiver Form required for aggregate transactions greater than \$10,000. 	Yes