



Federal Procurement Checklist

Appalachian Community Innovation Centers Program

1. Prepare for Procurement Process

- a. Maintain Documented Procedures: Per [2 CFR § 200.318\(a\)](#), Subrecipients must maintain and utilize documented procedures for procurement transactions. These documented procurement procedures must be consistent with State and local laws and regulations *and* the standards in [2 CFR §§ 200.317 through 200.327](#).
- b. Understand Requirements: Review federal, state and local procurement standards.
 - i. Federal Standards: [2 CFR §§ 200.317 - 200.327](#).
 - ii. State Standards: [Ohio Revised Code](#), [Executive Order 2019-12D](#), and [Executive Order 2022-02D](#).
 - iii. Local Standards: varies.
- c. Verify Internal Policies: Ensure the procurement complies with both the federal requirements and your organization's procurement policies. Where a conflict exists, the strictest provision must be followed.

2. Determine Your Procurement Method

Below are the Federal Procurement Thresholds. Be aware that you must use the stricter of your local and federal threshold requirements when procuring goods and services.

- a. Micro-purchases (under \$10,000): You must document the transaction, but competitive quotes are not required. You may self-certify a threshold up to \$50,000 on an annual basis – the process to self-certify may be found in [§ 200.320\(a\)\(iv\)](#).
- b. Simplified Acquisitions (\$10,000 - \$250,000): You must obtain price or rate quotes from a reasonable number of qualified sources. You may exercise judgment in determining what number is adequate (three quotes typically suffice). The simplified acquisition threshold increases from \$10,000 to \$50,000 if you self-certify per the process in [§ 200.320\(a\)\(iv\)](#).
- c. Sealed Bids and Competitive Proposals (\$250,000 and above):
(Note: for contracts over \$250,000, conduct a cost or price analysis).
 - i. Sealed Bids: This method involves conducting a formal advertising process with sealed bids. The contract is awarded to the most responsive and lowest bidder.
 - ii. Competitive Proposals: This method is utilized for contracts awarded based on factors other than cost alone. It involves publicly advertising and evaluating proposals based on predefined criteria.
- d. Noncompetitive Procurement: Noncompetitive procurement above the micro-purchase threshold is allowed only under a very specific set of conditions, which can be reviewed in [§ 200.320\(c\)](#).

3. Solicitation and Selection

- a. Description: Ensure all solicitations include a clear and accurate description of the goods or services.
- b. Selection: Select vendors based on documented standards of quality, capability, cost, and compliance.
- c. Conflicts: Verify that individuals involved in the procurement process are free of conflicts of interest.
- d. Documentation: Maintain documentation of all solicitations, bids and selection justifications.

4. Contract Provisions

- a. Include federal requirements and provisions in all contracts, such as equal employment opportunity, Title VI of the Civil Rights Act of 1964, Seat Belt Use, Reducing Text Messaging While Driving, debarment and suspension, and publication requirements. Language related to these requirements can be found in the [Subaward Terms and Conditions](#).

5. Compliance and Documentation

- a. Recordkeeping: Maintain records sufficient to detail the history of procurement, including rationale, selection criteria, and award decisions. **OFCC will request additional information following your first reimbursement submission involving a selected vendor or contract to ensure procurement standards were followed.**
- b. Closeout: Ensure final payments are made only after verifying all federal requirements and contract terms are met.
- c. Monitor Performance: Periodically monitor the vendor's performance to ensure compliance with contract terms.

6. Preparing for Audit

- a. Review your policies annually to ensure compliance with any federal regulation updates.
- b. Be prepared to provide documentation during an audit if requested.

Other Considerations:

Internal Controls

- Per [2 CFR § 200.303\(a\)](#), Subrecipients must establish, document and maintain effective internal control over the federal award. These internal controls should align with the guidance in "[Standards for Internal Control in the Federal Government](#)" issued by the Comptroller General of the United States, or the "[Internal Control-Integrated Framework](#)" issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

- Ohio Department of Education and Workforce Internal Controls Resources Page ([link](#))

Mandatory Disclosures

- Per [2 CFR § 200.113](#), Subrecipients must promptly disclose credible evidence of a violation of a federal criminal law which would potentially affect the award. You must provide written disclosure of the potential violation to the U.S. Treasury Office of Inspector General.

Whistleblower Protections

- Per [2 CFR § 200.217](#), Subrecipients must inform their employees in writing of employee whistleblower rights and protections under [41 U.S.C. 4712](#).

Conflicts of Interest

- Subrecipients must create and maintain a conflict of interest policy consistent with [2 CFR § 200.318\(c\)](#).

Domestic Preferences in Procurement

- To the extent practicable and consistent with applicable law under the award, the Subrecipient will provide a preference for the procurement or use of goods, products, or material produced in the United States as described in [2 C.F.R. § 200.322](#) and [Executive Order 14005](#) Ensuring the Future is Made in All of America by All of America's Workers (January 25, 2021).

Review the Grant Agreement and Exhibits

- This checklist includes the key provisions to consider when procuring goods and services. Review the Grant Agreement and Exhibit B – Terms and Conditions to ensure you are aware and following all the requirements.

By completing and signing this checklist, you acknowledge the federal procurement standards applicable to the Appalachian Community Innovation Centers Grant Program.

Contact Name

District Name

Date