



# ALVIN ISD

## State and Federal Grant Policies and Procedures

### EDGAR COMPLIANCE WORKFLOW AS OF SEPTEMBER 19, 2019

Code Of Federal Regulations (CFR) Title 2 Grants and Agreements, Part 200  
CFR 2 § 200

# WHAT/WHO IS EDGAR?????

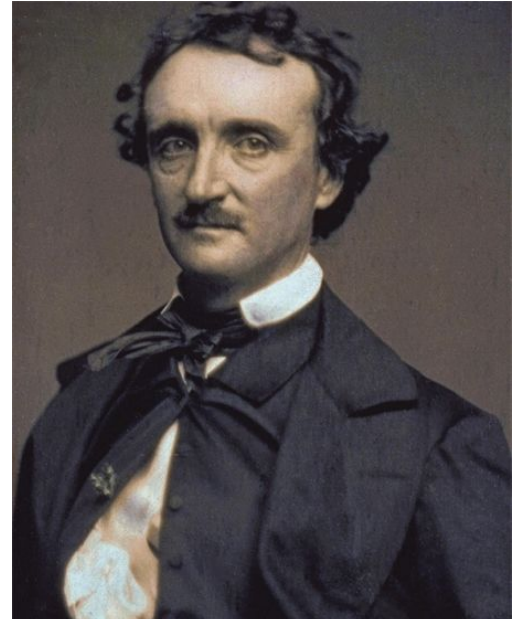
**E** DUCATION

**D** EPARTMENT

**G** ENERAL

**A** DMINISTRATIVE

**R** EGULATIONS



# WHAT IS EDGAR?????

The purpose of EDGAR is to “prevent fraud, waste and abuse” (2 CRF §200.25 (e)) ... (while using FEDERAL FUNDS for the purchase of Goods and Services).

Basically, they are purchasing policies and procedures like TEC (Texas Education Code 44.031) that we need to follow as we use Federal Funds ( Part 2 CRF § 200) for purchasing goods and services.

# There Are Three Types of Purchasing Methods Available from EDGAR We Will Discuss Today...

Procurement Method for Non-Approved Vendors - Micro Purchase less than \$10,000  
2 CFR § 200.320 (a)

*Consider It As A One Time Purchase Outside Bid Category*

Procurement Method - Small Purchase less than \$250,000  
2 CFR § 200.320 (b) & (e)

RECOGNIZED  
AS BEST  
PRACTICE  
FOR  
CAMPUSES +  
DEPTS

Requires the use of “Approved Awarded Vendors” from  
District Proposals or Cooperatives for these purchases.

\*Per TEC 44.031 purchases **Over \$50,000** In an Aggregate Must Be Competitively Purchased.

\*Per CH(Local) **Line Items Over \$75,000** require Board Approval.

Procurement Method - Noncompetitive Proposal  
2 CFR § 200.320 (f)

Considered as a Sole Source Vendor - *“NOTHING IS A SOLE SOURCE”*

# Procurement Method for Non-Approved Vendors - Micro Purchase less than \$10,000

## 2 CFR § 200.320 (a)

***Consider It As A One Time Purchase Outside Bid Category***

“Because of the annual aggregate limit and the size of our district, micro-purchases will be used on an exception basis and the small purchase procedures is recommended.

Micro-Purchases will follow the guidelines for use under the One Time Purchase Outside Bid Category and for Contract Services the use of a Contract Service Agreement as identified in Alvin ISD Purchasing Policies and Procedures.”

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Return the following paperwork to Purchasing for Consideration, Filing as Backup and Vendor Profile Setup.

### **Goods to be Purchased:**

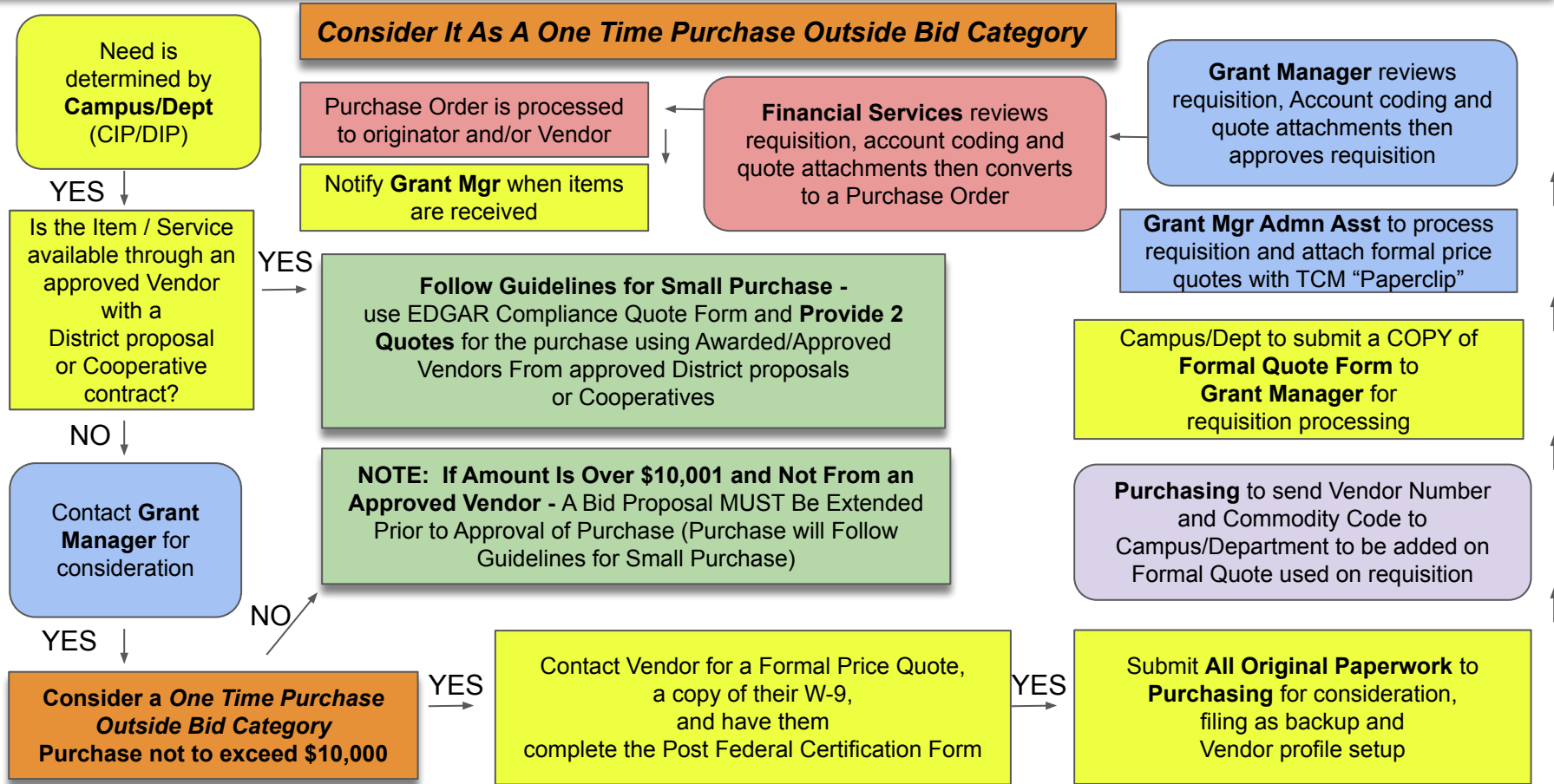
- ★ Letter Requesting 1X Purchase **using Federal Funds**
- A Vendor Price Quote
- A W-9
- Post Federal Compliance Document

### **Contracted Services Purchased - see addt'l info:**

- A Contracted Service Agreement
- Separate Signed Contract
- A W-9
- Post Federal Compliance Documents
- ★ If Continuous Usage Anticipated Agreement will be transitioned into a Federal Compliant Contract Proposal

# Procurement Method for Non-Approved Vendors - Micro Purchase less than \$10,000

## 2 CFR § 200.320 (a)



## Procurement Method - Small Purchase less than \$250,000

2 CFR § 200.320 (b)



Requires the use of “Approved Awarded Vendors” from District Proposals or Cooperatives for these purchases.

\*Per TEC 44.031 purchases **Over \$50,000** In an Aggregate Must Be Competitively Purchased.

\*Per CH(Local) **Line Items Over \$75,000** require Board Approval.

“The district will strive to obtain small purchases from qualified (awarded/approved) vendors. An awarded/approved vendor is defined as a vendor who has completed the competitive procurement process for qualifications, discounts, and/or line item type purchases from local bid/proposals or cooperative catalog/discount, and/or a multi-award bid proposal that contains the applicable contract provisions.

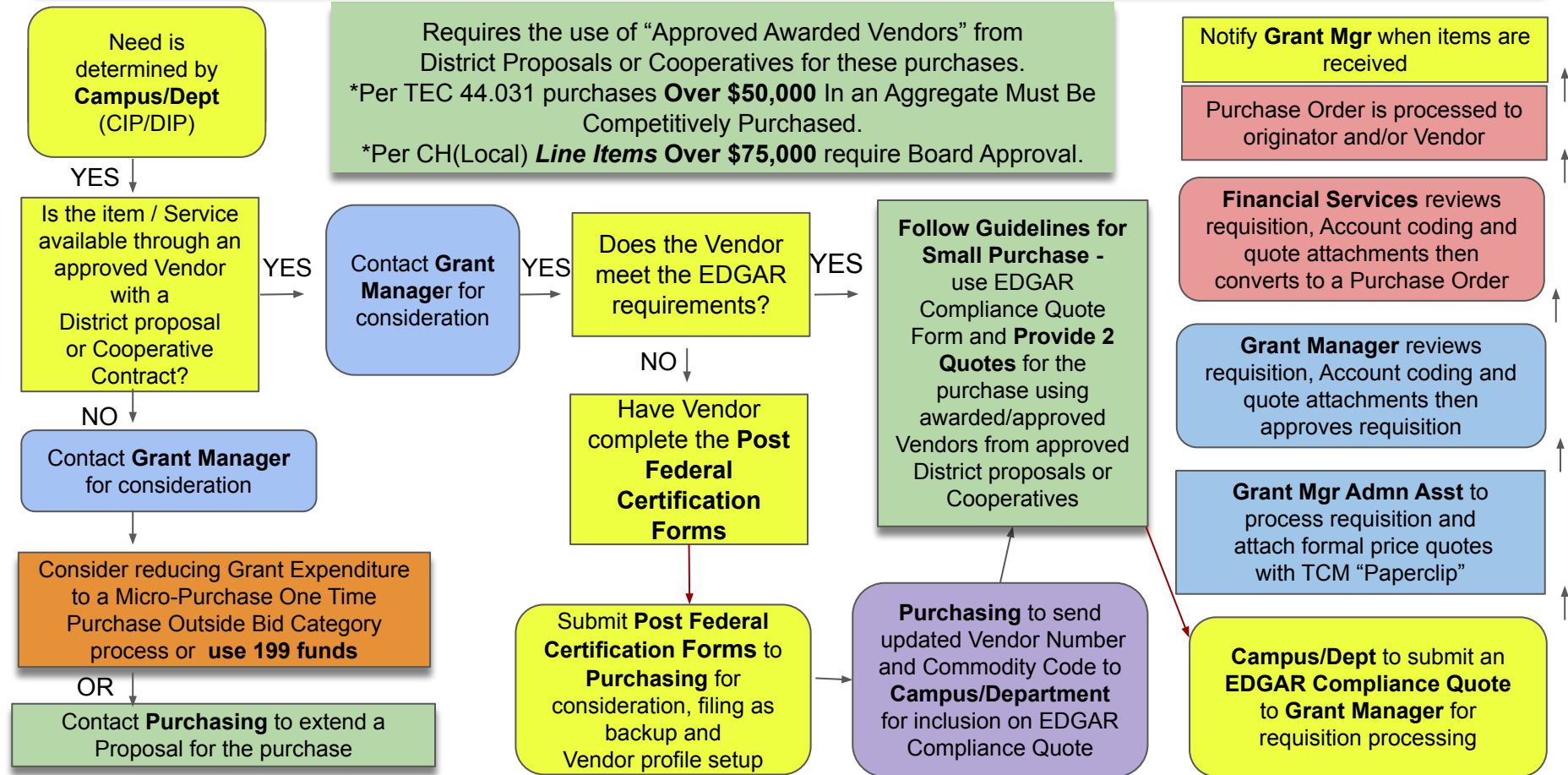
Awarded vendors and the quote summary form can be found on the Purchasing Department Website and Munis financial system.

In accordance with 2 CFR §200.320 (b), if small purchases procedures are used, price or rate quotations must be obtained from **an adequate number of qualified sources. Our district has established an adequate number to equal 2 quotes from qualified sources.**”

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# Procurement Method - Small Purchase less than \$250,000

2 CFR § 200.320 (b) & (e)





**After checking the Website for Cooperatives, what if the Vendor we want to use is on a different Cooperative NOT on our list? We want to still use them for the purchase! What steps do we take to order from them?**

Click on our link to our Website for a List of Cooperatives we participate in - the list is updated on a regular basis:

[ALVIN ISD PURCHASING COOPERATIVE WEBSITE](#)

★ CONTACT PURCHASING - Email with following information:

- What is the Cooperative Name?
- What is their Website?
- What are you wanting to purchase?
- Is there a fee to join the Cooperative?
- Send a copy of a quote from the vendor describing the item you are wanting to purchase under the Cooperative.

- Purchasing will contact Cooperative Representative to obtain their Interlocal Agreement to join their Cooperative

- Purchasing will process Interlocal Agreement and take to Board for approval

- Upon approval, we will send signed Interlocal Agreement to Cooperative Representative for Processing

- Purchasing will update the Vendor Profile and send Vendor Number and Commodity Code to Campus/Dept for processing EDGAR Compliance Form

★ Process can take up to 4 weeks depending upon board meeting availability

## Procurement Method - Noncompetitive Proposal 2 CFR § 200.320 (f)

**NOT A  
RECOMMENDED  
PROCUREMENT  
PROCESS!!!!**

Considered as a Sole Source Vendor - “*NOTHING IS A SOLE SOURCE*”

The purpose of EDGAR is to “prevent fraud, waste and abuse”  
(2 CFR §200.25 (e))  
...(while using FEDERAL FUNDS for the purchase of Goods and Services).

“Sole-source must be proven and adequately documented and will seldom be used in federal procurements.”

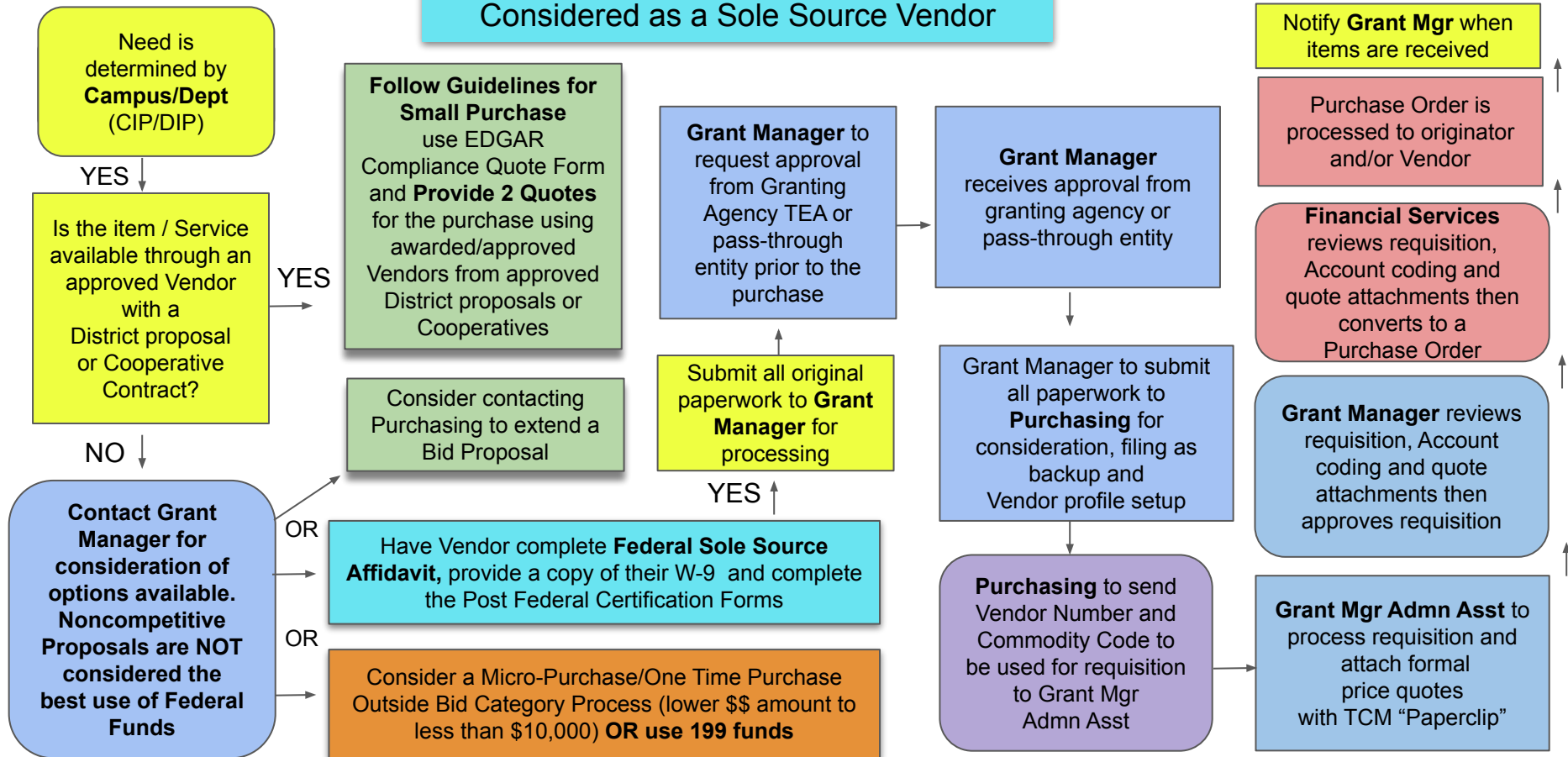
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- “If you can find something similar on the Internet it is NOT a Sole - Source.”

# Procurement Method - Noncompetitive Proposal

## 2 CFR § 200.320 (f)

Considered as a Sole Source Vendor



# Contracted Services (Obligation of Federal Funds)

34 CFR § 76.707

## Procurement Method for Non-Approved Vendors - Micro Purchase less than \$10,000

2 CFR § 200.320 (a)

- ★ Vendor to complete the Contract Service Agreement with Post Federal Compliance Forms.
- ★ If the Vendor will be with Students they must complete the "Fingerprinting Forms".

## Procurement Method - Small Purchase less than \$250,000

2 CFR § 200.320 (b) & (e)

- ★ Use currently Approved Proposals and/or Cooperative Contracts from the Vendors with the Qualified Federal Compliance Forms
- ★ Complete the Edgar Compliance Quote Form

- *You can only obligate funds (type a Purchase Order) after there is a binding written commitment obtained for the identified services to be rendered.*
- *This commitment should include the pertinent information regarding dates, times, locations, and cost. The commitment must be limited to the grant year (July 1st - June 30th).*
- *The commitment must be signed and dated **by both parties AFTER July 1st**. This commitment is actually considered a **signed contract** between Alvin ISD and the Contractor to be providing the services.*
- *You can only pay for the services after services are rendered - no prepay is allowable with Federal Funds.*

[Return to Federal Compliance Webpage](#)