

**SUBJECT: GUIDELINES FOR FEDERAL FUNDING PURCHASES**

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a Federal award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents can neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. If the financial interest is not substantial or the gift is an unsolicited item of nominal value (\$75), no further action will be taken. Otherwise, however, disciplinary actions will be applied for violations of this section.

The District will avoid acquisition of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase. Where appropriate, an analysis will be made of lease versus purchase alternatives and any other appropriate analysis to determine the most economical procurement approach. The District will also analyze other means, as described in Policy 200.318 of the Uniform Guidance, to ensure appropriate and economical acquisitions.

The District will make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed procurements where the Federal awarding agency or pass-through entity believes such review is needed.

The District program staff will be required to notify the Purchasing Department that Federal funding will be used for a certain procurement/contract. When requesting a written bid or contract, the District program staff will be responsible for running the name of the vendor/contractor through the System for Award Management (SAM) to determine any exclusion. A copy of the SAM search will be included with the contract request. Prior to issuing a Purchase Order using Federal funds, the Purchasing Department will check the SAM to determine if any exclusion exists for the vendor/contractor. If a vendor/contractor is found to be suspended or debarred, the District will immediately cease to do business with the vendor.

District contracts will contain the applicable provisions described in Appendix II to 2 C.F.R. Part 200 (Contract Provisions for Non-Federal Entity Contracts under Federal Awards.)

Ref: General Municipal Law, Section 805-a; Board Policy §6110 Code of Ethics for all District Personnel

Adopted: 11/28/2018