

519: Procurement and Expenditures Policy for Title I

Purpose

This policy establishes the standards and procedures for the procurement of goods and services, as well as the authorization of expenditures, under Title I programs. The Local Education Agency (LEA) affirms that all procurement and expenditure activities are conducted in compliance with federal regulations, specifically 2 CFR §§ 200.318–200.320, and are designed to ensure transparency, accountability, and proper stewardship of federal funds.

Policy Statement

The LEA makes an assurance that it maintains written policies and procedures governing procurement and expenditures under Title I. All expenditures incurred under Title I, including but not limited to instructional supplies, materials, contracted services, and equipment, must be:

- **Reasonable:** Costs must reflect what a prudent person would pay under similar circumstances.
- **Allowable:** Costs must be permissible under Title I regulations and federal cost principles.
- **Allocable:** Costs must be clearly attributable to the Title I program and necessary to achieve program objectives.

General Procurement Standards (2 CFR § 200.318)

1. The LEA will maintain oversight to ensure contractors and vendors perform according to the terms, conditions, and specifications of their contracts.
2. Employees engaged in the selection, award, or administration of contracts must avoid conflicts of interest and may not solicit or accept gratuities or favors from contractors.
3. Procurement procedures will ensure full and open competition, maximize cost-effectiveness, and promote responsible use of federal funds.

4. The LEA will maintain records sufficient to detail the history of each procurement, including rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

Competition (2 CFR § 200.319)

1. All procurement transactions must be conducted in a manner that provides full and open competition.
2. The LEA will avoid organizational conflicts of interest and unfair competitive advantages.
3. Specifications must not contain features that unduly restrict competition.
4. The LEA will take necessary steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible.

Methods of Procurement (2 CFR § 200.320)

The LEA will use the following methods of procurement as applicable:

1. **Micro-Purchases (≤ \$10,000 or federal threshold):** May be awarded without soliciting competitive quotations if the price is reasonable.
2. **Small Purchases (≤ \$250,000 or federal threshold):** Require price or rate quotations from an adequate number of qualified sources.
3. **Sealed Bids:** Used for purchases over the small purchase threshold where goods or services are clear, specific, and awarded to the lowest responsive and responsible bidder.
4. **Competitive Proposals:** Used when sealed bids are not appropriate, such as for professional services; proposals are evaluated based on established criteria.
5. **Noncompetitive Proposals (Sole Source):** Used only when competition is not feasible, such as when a single source is available, in cases of public emergency, or when authorized by the awarding agency.

Expenditures

1. All expenditures must be directly tied to Title I program goals and objectives.
2. Expenditures must be pre-approved, documented, and supported by appropriate records, such as purchase orders, invoices, and receipts.
3. Expenditures must be reviewed and approved by designated LEA personnel to ensure compliance with federal, state, and local requirements.

Recordkeeping and Monitoring

1. Procurement and expenditure records will be retained in accordance with federal and state retention requirements.
2. Internal controls will be in place to prevent waste, fraud, and abuse.
3. The LEA will conduct regular monitoring and audits to ensure compliance with this policy and federal regulations.