

Grant Procurement Policy



I. Introduction and Purpose

In keeping with its commitment to conduct business in the highest ethical standards GTA has adopted this procurement policy and associated procedure to ensure that goods and services purchased by GTA for state and federal awards are obtained in a cost-effective manner and in compliance with federal and state law.

The acquisition processes described in this policy apply to all purchases made by GTA for these awards, and certain transactions may be subject to prior approval by federal or state agencies that have awarded grants, contracts, or loans to GTA. In all cases, GTA shall be responsible for reviewing purchases for allowability, applicability, and allocability of grant, contract, or loan funds to the purchase.

The applicable regulations which shall be followed under this Policy include, but are not limited to, the following:

§ 2 C.F.R. 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

GTA may, in its discretion, amend this Policy to conform with Federal, state, or local governmental regulations, guidelines, policies, Executive Orders, Federal Register Notices, or for other reasons.

Should you have any questions regarding this policy, contact your Grant Administrator.

II. Code of Conduct

GTA employees shall not participate in the selection, award, or administration of a contract if they have a real or apparent conflict of interest. Such a conflict arises when:

- i. Any immediate family member (spouse, child, parent, parent-in-law, sibling, or sibling-in-law); partner; or an organization that employs, or is about to employ, any of the above has a direct or indirect financial or other interest in or will receive a tangible personal benefit from a firm or individual considered for the contract award.
- ii. An “organizational conflict of interest” is created because of a relationship GTA has with a parent, affiliate, or subsidiary organization that is involved in the transaction such that GTA is or appears to be unable to be impartial in conducting a procurement action involving the related organization.

GTA prohibits employees from seeking or accepting any gifts, favors, entertainment, payment, loans, or anything of more than nominal value for themselves. Which includes services from vendors, prospective vendors, parties to subcontracts, or any other person or entity that receives or may receive compensation for providing goods or performing services for GTA. **Cash should never be accepted.**

III. Profit

For procurements over the Simplified Acquisition Threshold according to §2 C.F.R. 200.324, such as sole source (due to scientific reasons/uniqueness) procurements or when cost analysis is used, profit must be negotiated as a separate element of the procurement price.

To establish a fair and reasonable profit, consider: complexity of work performed, risk borne by contractor, contractor's investment, amount of subcontracting, quality of contractor's record and past performance, and industry profit rates in surrounding geographical area for similar work.

IV. Small, Minority, and Women Owned Business Vendors

Small, Minority, and Women Owned Business Vendors: GTA is committed to taking all necessary affirmative steps to assure that small, minority, and women owned business ("SMWOB Vendors") are used whenever possible. Such steps include:

- Placing qualified SMWOB Vendors on solicitation lists;
- Soliciting SMWOB Vendors whenever they are potential sources;
- Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by SMWOB Vendors;
- Establishing delivery schedules, where requirement permits, which encourage participation by SMWOB Vendors;
- Using services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce;
- Requiring the prime contractor, if subcontracts are used, to take affirmative steps.

V. Bonding Requirements

Bonding requirements according to §2 C.F.R. 200.326: For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold of \$250,000, the Federal awarding agency or pass-through-entity may accept the bonding policy and requirements of the non-Federal entity providing that the Federal awarding