

**ROBSTOWN INDEPENDENT SCHOOL DISTRICT
AGENDA ACTION SHEET**

Date: September 12, 2022

Subject: **CONSIDER AND POSSIBLE ACTION REGARDING SELF-CERTIFICATION OF DISTRICT
MIRCO PURCHASE THRESHOLD**

Administrator Responsible: Vanessa R. Riggs

Position: Chief Financial Officer

A. Purpose of Agenda Item:

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Information Only

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Action Needed

B. Authority for this Action:

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Local Policy _____

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Law or Rule 2 CFR 200.320

C. Strategic Objective, Goal, or Need Addressed:

To increase the micro purchase threshold to \$49,999.

D. Summary:

2 CFR §200.320 officially sets the micro-purchase threshold at \$10,000 in the aggregate across all federal grant programs for the fiscal or grant year. It also allows the LEA to annually self-certify a higher micro-purchase threshold of up to \$50,000 if the LEA:

- is a low-risk auditee for their most recent federal audit; or
- conducts an annual internal risk assessment to identify, mitigate, and manage financial risk.

Due to state [Financial Accountability System Resource Guide \(FASRG\) rules](#), the LEA may only self-certify a threshold up to \$49,999.

If the LEA chooses to self-certify a higher micro-purchase threshold, the LEA must notify TEA annually by submitting an online form and maintain the following information for auditors or monitors.

1. Current self-certification of an increased micro-purchase threshold, including a justification and clear identification of the new threshold, documented in local board approved policy;
2. Written procurement policies updated to reflect the increased micro-purchase threshold; and
3. Proof of eligibility, documented annually, of:
 - Low risk level from the LEA's most recent federal audit, OR
 - Annual internal risk assessment conducted by the LEA to identify, mitigate and manage financial risks.

Administration set the micro-threshold certification to 25,000 for the 2021-2022 fiscal year. This year administration would respectfully request that the Superintendent be delegated the

authority to increase the threshold to \$49,999. This would allow more flexibility to the district when making federal purchases. The district would only be required to obtain one quote for purchases up to \$49,999. The district is currently purchasing items for safety and security with federal funds and this would allow us to move forward with purchases in a timelier manner. Attached is a copy of the Self-Certification of Increased Micro-Purchase Threshold the Superintendent would need to sign.

E. Alternatives Considered:

F. Comments Received:

G. Administrative Recommendation:

The Board of Trustees delegate the Superintendent the authority to execute the Self-Certification of increased Micro-Purchase Threshold as presented by Administration and further authorize the Superintendent or his designee to take all necessary steps to effectuate same.

H. Fiscal Impact and Cost:

I. Monitoring and Reporting Time-Line:



Robstown Independent School District

Self-Certification of Increased Micro-Purchase Threshold

WHEREAS, Pursuant to Board Policy CH (Local), the Board has authorized the Superintendent to develop purchasing procedures to implement the requirements of state and federal law. Further, the District's Board of Trustee has delegated authority to the Superintendent to make budgeted purchases of goods and services costing less than \$50,000.

WHEREAS, Pursuant to 2 CPR§ 200.320(a)(1)(iv), a non-Federal entity may self-certify a Micro Purchase Threshold up to \$50,000 on an annual basis and must maintain documentation to be made available to the Federal awarding agency and auditors in accordance with 2 CPR §200.334.

THEREFORE, Robstown ISD self-certifies that effective September 13, 2022, and for fiscal year 2022-2023, its Micro Purchase Threshold, as defined by 2 CPR 200.320(a)(1)(ii), is hereby increased to \$49,999.99. Unless otherwise required by the District's internal purchasing regulations or controls, purchases up to the Micro Purchase Threshold may be purchased without soliciting competitive price or rate quotations if the District considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly.

This self-certification is based on the following justification, as recognized and authorized by 2 CPR §200.320(a)(1)(iv)(C):

Texas law generally permits public school districts to make non-competitive purchases for goods or services valued less than \$50,000 in the aggregate, as set forth in Texas Education Code §44.031(a).

In any instance where Texas or other federal law imposes a requirement to competitively procure any good or service costing less than \$50,000, or where Texas or other federal law imposes more stringent purchasing standards or procedures than set forth in 2 CPR Part 200, the District will continue to follow the more restrictive legal requirement.

APPROVED BY:

Printed Name: Dr. Jose Moreno
Superintendent, Robstown Independent School District
Date: _____