



Today's Scholars – Tomorrow's Global Visionaries

Guidelines for Competitive Purchasing Below the Dollar Limits Required for Sealed Bids

The following guidelines are the minimum requirements that the Academies will follow. The Academies are not exempt from Federal Procurement guidelines when federal funds are used to purchase items and will follow UGG regulations and guidance listed in 2 CFR part 200. In all cases where bidding is not reasonable (i.e. sole sourced items), purchases will be made which carry out the academic mission and intent of the Academies. Any variations from these guidelines must be reasonable and must be documented in the minutes of the Governing Board. The Executive Director or authorized agents of the corporation have procurement authority per this policy, subject to the terms below:

1. Any employee or manager participating in a specific aspect of a specific procurement from which they could benefit directly or indirectly from a contract for such procurement must follow the school's Conflict of Interest Policy or in the absence of such a policy, the policy as stated in the corporation's bylaws. A violation of this prohibition may result in termination or other disciplinary action against employees or contractors. This policy is noted in the Academies Employee Handbook.
2. Procurements of goods and services shall be made by the designated personnel, in their best judgment, upon considering the totality of the circumstances surrounding the procurement, which consideration may include but not be limited to price, quality, availability, timelines, reputation and prior dealings with the company.
3. Employees or contractors will attempt to obtain written or oral price quotations from three or more vendors for all purchases of at least \$10,000.
4. Whether to request an oral or written quote is determined by analyzing the known requirements for an item or a collection of items that, in the aggregate, may result in the purchase of the item or items from one vendor.
5. Generally, the vendors contacted, and their price quotations will be written on or attached to the school's copy of the related Purchase Request Form. If three quotations cannot be obtained, the school may document the vendors contacted who did not offer price quotations and the reasons they would not do so. If a vendor is selected because of reasons other than the lowest price, such as quality of the product or work to be performed, the reasons are to be fully documented.
6. When possible, the school will attempt to issue invitations for price quotes with sufficient time before the purchase is to be made and in sufficient detail to allow vendors to adequately respond.
7. The school will obtain governing board pre-approval or ratification for any purchases greater than \$250,000, except for purchases, which impact new campuses prior to the formation of the Governing Board, which shall be authorized by the Corporate Board instead. Additionally, the Governing Board may also preapprove an amount of capital expenditures for the year as part of the budget process and would only approve additional expenditures over \$250,000 which are not part of this list.
8. The school will engage in the process of Request for Proposal (RFP) or Request for Qualifications (RFQ) for all purchases over \$250,000 per vendor or must document the reason why the vendor or item must be sole sourced. This reasoning must be provided to the governing board or corporate board prior to the procurement of such services or goods. The schools may issue multiple year RFQs or RFPs if it is deemed to be in the best interest of the schools in the interest of time or receiving the best pricing.

An exception to the above guidelines for price competition may be made in the event of an emergency involving the health, safety, or welfare of school personnel or students. In such an emergency, emergency purchase action may be taken without price competition. Prior approval of the Governing Board shall be obtained for such



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purchases, if possible, and if not, such purchases shall be ratified in future Governing Board meetings. Even under emergency conditions, price competition shall be sought if it will not unduly delay the correction of the condition requiring emergency procedures. If emergency purchases are made without price competition, a complete written description of the circumstances shall be maintained.