NORTHWEST OREGON WORKS	**POLICY F01: PROCUREMENT**
	APPROVED: 1/15/2016 - NOW **REVISION: 1/1/2021** **APPROVED REVISION: 6/27/2025** **INTERNAL REVIEW CONDUCTED: 6/15/2025**
	❒NEW **☒ REVISED**

POLICY

This policy provides guidance regarding the procurement and purchase methods for allowable costs pursuant to federal and state regulations and Oregon Northwest Workforce Investment Board doing business as Northwest Oregon Works (NOW) procedures.

All procurement processes shall be consistent with current minimum federal and state regulations and guidance that pertain to the funds being utilized.

Any discrepancies arising between NOW policy with federal and state provisions due to revisions will default to the minimum federal guidance provided.

NOW policy may set forth stricter requirements than provided by federal and state guidance, but in no case will the NOW policy not meet minimum federal and state policy.

NOW will follow policies on codes of conduct and conflict of interest during purchasing and procurement activities.

NOW will conduct all procurement transactions in a manner providing full and open competition as consistent with federal regulations.

Procurement procedures will be consistent using non-federal and federal funds.

Procurements and purchases will be based upon funding and budget availability and for the purpose of goals and objectives approved in NOW's budget.

Noncompetitive proposals must meet minimum federal qualifications and be approved by the Executive Director or designee prior to contract.

Methods of procurement vary by the size and type of the purchase. In all cases, purchases will be reviewed for cost reasonableness to foster greater economy and efficiency. Applicable NOW policies and procedures should be followed in conjunction with these policy guidelines.

Use of intergovernmental agreements where goods and services have already been evaluated and procured is encouraged and do not need additional solicitation documentation.

Micro-purchases
Procurement by micro-purchase is the acquisition of supplies or general professional and non-professional services, the aggregate dollar amount of which does not exceed $ 50,000. This amount was not prohibited under state laws or regulations and requires NOW to self-certify this threshold on an annual basis. NOW maintains the self-certification for availability upon request.
Micro-purchases may be awarded without soliciting competitive quotations and provide documentation for the following:

- Item purchased.
- Program for which purchase is used.
- Value of the purchase.
- Whether the price paid was reasonable and necessary.

Micro-purchases will be distributed equitably among qualified suppliers.

Small Purchases
Purchases of supplies, equipment and general professional and non-professional services between $50,001 and $250,000 will be deemed small purchases.

Equipment and capital improvement purchases of $10,000 and more with Federal funds needs prior approval from the awarding agency.

Where appropriate, an analysis will be made of lease versus purchase alternatives, and any other appropriate analysis to determine the economical approach.

Informal solicitation documentation shall be used to secure responses from at least three sources. Information collected should include a description of the item or service needed; proposed time schedule needed; comparison of costs including setup, delivery, taxes, etc.; and reason for selection if other than cost.

Purchases of services related to delivery of Workforce Innovation and Opportunity (WIOA) Title I-B or related activities, including one-stop operations, even if under $250,000, may have additional requirements.

Competitive Proposals
Purchases of supplies, equipment, and any professional service, including delivery of services of WIOA Title I-B activities, of more than $250,000 shall be procured through a competitive proposal.

Requests for Proposals (RFP's) will be publicized and solicited from an adequate number of qualified sources.

Description of required services or components, clear description of any technical requirements, and evaluation factors and their relative importance will be identified in the request for proposal.

Responses will be reviewed and evaluated based on consistent grading methods for each proposal. Review Committees or third-party evaluator will be established for evaluating delivery of WIOA Title I-B services.

When selecting contractors and service providers, award will be made to the responsible firm whose proposal is most advantageous to the program. Selection consideration will be given to such matters as price, contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. An additional price analysis will be conducted if the anticipated award amount is in excess of the Simplified Acquisition Threshold as set by federal guidance.

Bidders may be required to complete a Statement of Qualifications (SOQ). The SOQ must be approved by the Executive Director or designee prior to the award of funds.

Contractors will be verified they are not excluded from participation in federal awards.

Contracts will be administered to ensure contractor conformance with the terms, conditions, and specifications. Contractor performance reviews and monitoring shall be done per established policy and procedures of NOW's requirements.

Records sufficient to detail the history of procurement will be maintained. These records will include clear descriptions of all work or materials being procured, specific definitions for deliverables and/or outcomes; standards for work quality or performance; acceptability criteria, timelines, reports, or related documentation; cost components; and vendor invoicing and contract payment structure. Documentation specifically addressing cost analysis, and justification performed; solicitation methods used and outcomes; contract award process used; and contract or agreement documents must also be included.

Bidders will be notified with the results of the procurement. Bidders may file a written appeal within seven (7) calendar days after the award, to the Executive Director at the administrative office. Appeals will be handled according to NOW's complaint resolution procedures. If appealed, the effective date of contract award may be delayed pending resolution of the appeal. NOW reserves the right to renegotiate or reissue an RFP should an appeal for non-award be upheld.

Commented [ER1]: Is this the Grievance Process policy?

Exclusions that apply to this policy include:

- On-The-Job Training (OJT). The competitive provisions of this policy will not apply to OJT employers, except in the procurement of OJT brokering services.
- Customized Training agreements are excluded from procurement requirements.

- Training on an Eligible Training Provider List. The training from vendors is excluded if it is on the State/Local list.
- Support Services. The provision of support services is excluded if the cost is within the Federal Micro-Purchase threshold. NOW Support Services policy limitations must be followed.
- WIOA Admin services are excluded from procurement requirements with the exception of Audit Services which must be procured in accordance with this policy.

Noncompetitive Proposals
Procurement by noncompetitive proposals, or sole source, is procurement through solicitation of a proposal from only one source and may be used only when one or more of the following conditions apply:

- The item is available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
- The Federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request from the non-Federal entity; or,
- After solicitation of a number of sources, competition is determined inadequate.

Noncompetitive proposals pertaining to the selection of a one-stop operator, eligible training providers, etc. must follow the guidance provided in the Workforce Innovation and Opportunity Act.

Contract Reviews
All contracts must be thoroughly reviewed and approved by the CFO/CCO prior to execution to ensure the terms of the agreements are consistent with their intended purpose. Documentation of the CFO's/CCO's review, considerations, and the ultimate, subrecipient versus contractor determination will be maintained and clearly communicated to all appropriatearties of the agreement.

REFERENCES
2 CFR 200.67
2 CFR 200.317-327
2 CFR 200.313-316
2 CFR 200.520
29 CFR 95, 97, 98
ORS 279 A & B
Workforce Innovation and Opportunity Act

Self-Certifying Micro-Purchase

Northwest Oregon Works performs a self-certification each year during the month of January upon the completion of the organizations audited financial statements. Upon review of NOW's most recent audit, the organization was identified as a low-risk auditee on the Schedule of Findings of Questioned Costs. NOW therefore maintains micro-purchase threshold of $50,000.