POLICY ON PURCHASING

ROOSEVELT UNIVERSITY

February 7, 2007

Purpose: To ensure that Roosevelt University exhibits fiscal prudence and diligent stewardship of resources, as well as high ethical and legal standards, when conducting any purchasing activity. To ensure that the University complies with applicable governmental laws and regulations regarding purchases using sponsored grant or contract funding.

Rationale: All purchasing activity at Roosevelt University should support its mission of social justice and equal educational opportunity, and demonstrate a commitment to excellent and ethical business standards and practices. In situations involving government grant or contract-funded purchases, Roosevelt must comply with government requirements related to their administration. Lack of compliance may result in civil and criminal penalties.

Policy: Roosevelt University aims to procure all goods and services through fair business relationships, with terms and conditions clearly delineated to protect the University. Transaction processing involving purchase requisitions and purchase orders includes a centralized system of checks and balances that is designed to ensure that budget administrators are able to provide oversight of expenditures in light of fiscal guidelines and program or departmental goals. The Office of Purchasing investigates and develops vendor resources and provides coordination, technical assistance, and guidance.

For a purchase of $25,000 or more, the budget administrators must obtain at least three competitive bids. Signatures of the budget administrator and his or her dean/vice president on the resulting Purchase Requisition will certify that they have complied with this policy. Budget administrators or others using a competitive bid process will retain sufficient supporting documentation to describe and support:

a) the vendor selected
b) the competitive bid process
c) the solicitation of woman- and minority-owned vendors
d) the specific description and price of the goods or services offered
Division vice presidents may establish lower minimum thresholds for requiring competitive bids, if they deem it appropriate. Exceptions to competitive bidding must be approved by the division vice president of the area from which the request originated. Documentation justifying sole source vendor selection must be retained on file. The countersignature of the president or provost is required for an exception to competitive bidding when the purchase is in the amount of $250,000 or more. The University’s Policy on Woman- and Minority-Owned Vendors also applies.

When making purchases using Federal, State, or local government funds obtained through grants or contracts, Roosevelt University will maintain full compliance with specific grant or contract requirements and with all applicable federal, state, and local requirements including, but not limited to, Circular A-110 of the Office of Management and Budget (OMB) and the Federal Acquisition Regulation (FAR). OMB A-110 stipulates the following requirements, among others:

- Open and free competition for procurement transactions, to the maximum extent practical,
- Adherence to an ethical code of conduct in purchasing activities,
- Written procurement procedures that clearly explain the duties, responsibilities and accountabilities as they relate to employees conducting purchasing activities,
- Affirmative steps to engage small, minority, and woman-owned vendors, and
- Procurement records for purchases in excess of the “small purchase threshold” of $25,000, showing basis of contractor selection, rationale for the award cost or price, and if applicable, justification for lack of competition (e.g., sole source).

State and local government laws, ordinances and regulations generally follow federal requirements, but may involve other, sometimes more stringent, requirements.

Failure to comply with this policy will delay or suspend the issuance of the related purchase order. To promote a high standard of ethics related to purchasing, the University adheres to the nationally recognized Code of Ethics of the National Association of Educational Procurement (NAEP). (See Purchasing website for link to NAEP’s Code.) The Assistant Vice President for Administrative Services and the Senior Vice President, Finance and Operations, are delegated the authority and responsibility to ensure that budget administrators adhere to this policy.