

	Universidad Central del Caribe Sponsored Projects Procurement Policy	Policy#	ADR 012
		Implementation Date	February 2015
		Contact	Dean of Administration
		Last Reviewed/Update	February 2020
		Approval by	President

Responsible Office: Purchasing Office

Background

45 CFR 74.40 to 74.48 (Procurement Standards - Uniform Administrative Requirements for Awards And Subawards to Institutions of Higher Education, Hospitals, Other Nonprofit Organizations, and Commercial Organizations} and 2 CRF 200.317 to 200.326 (Procurement Standards - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards} set forth the regulations for the procurement of supplies and other expendable property, equipment, real property and services by recipients of federal funds. It is UCC's policy to obtain materials and services in an effective manner and in compliance with applicable federal provisions and sponsor restrictions.

Policy

1 Ethical standards

Employees involved in any aspect of the purchasing process must comply with the conflict of interest policy and have a responsibility to ensure that the highest standards of ethics, integrity, and fairness are maintained in all such activities. Those responsibilities include fairly evaluating bids received, not sharing pricing and terms/conditions of one bidder with any other bidders or potential bidders and ensuring that competitive pricing, once attained, is realized. In addition, all personnel soliciting or accepting quotations or submitting purchase requisitions from suppliers that employ members of their families, or when they or members of their families have a financial or other interest, must report this information in writing to the Director of Finance prior to the order being placed or the quote being solicited. The solicitor must inform the purchasing agent about the potential conflict of interest when the requisition is submitted and the documentation must be included in the purchasing records.

University personnel shall not solicit gifts or accept significant gifts (also known as kickbacks} from any suppliers or prospective suppliers. A 'significant gift' is defined as any item of value, service, favor, commission, money, credit, fee, gratuity, compensation or discount not available to others, which could influence purchasing or contracting decisions. University personnel may accept trivial items as a matter of courtesy, but may not solicit them. Acceptance of social invitations to occasional business meals, entertainment, and hospitality will be subject to prudent judgment as to whether the invitation, occasion, frequency, and choice of facilities places or appears to place the recipient under any obligation with the supplier. Federal regulations impose criminal and civil penalties to any person who knowingly and willfully engages in the prohibited kickback conduct and

mandate full institutional cooperation with any federal agency investigating possible violations of the kickback statute.

2. Competition and Prudent Vendor Selection

The Principal Investigator / Project Director {PI/PD} is accountable for the execution of the sponsored award and is responsible for procuring the materials, goods and services that will best meet the goals of the program under the terms and conditions of the award. The PI/PD must evaluate vendors in good standing possessing the ability to fulfill the proposed procurement successfully. Consideration should be given to such matters as vendor integrity, technical resources, compliance with public policy, record of past performance with UCC and commitment with environmental sustainability.

UCC is committed to the responsible planning and management of resources and requires the establishment of competition for the good and services procured by all campus activities. Refer to the Purchasing Procedures Manual for details.

3. Requisition Approval

All requisitions must be endorsed by the PI/PD using the official approval signature recorded by the Purchasing Office. The PI/PD may designate the signature authority to university employees associated to the award who may approve purchases. The PI/PD is ultimately accountable for all the purchases allocable to the sponsored project and must inform the Purchasing Office when designations are revoked or when changes in personnel affect the signature authorization for the projects under the PI/PD's control.

4. Business Process for Sponsored Program Procurement

- The PI/PD or the authorized designees generate a signed requisition form with the required quotes and justifications.
- The Purchasing Office receives the requisition form and the approval signature is verified before a requisition number is assigned.
- The Purchasing Office assigns a purchase order number, places the order and informs Fiscal Resources, the Receiving Office and the PI/PD of the purchase order to be charged to the appropriate award account.
- The merchandise and equipment are received by the Receiving Office who will assign a property number to the equipment, as needed, before delivering to the PI/PD.

5. Roles and Responsibilities Principal

Investigator/Project Director

- Determines what needs to be purchased
- Researches and recommends vendors
- Solicits prices
- Analyzes costs and assess other important factors (i.e. delivery, customer service, etc.)
- Creates and sign requisition, turn it to the Purchasing Office
- Maintains documentation of purchases allocated to sponsored projects

Purchasing Office

- Receives requisition forms and verify the authenticity of the endorsing signature before requisition numbers are assigned.
- Confirms price and selects vendor.
- Assigns purchase order numbers and place the orders.
- Informs Fiscal Resources and the PI/PD of the processed order.
- Keeps records of all placed orders.

Receiving

- Tracks order status with the supplier.
- Receives the ordered materials and assign property numbers as needed.
- Delivers the goods to the PI/PD.
- Informs Fiscal Resources of the delivery of the purchased goods.
- Keeps records of equipment with property numbers.

Fiscal Resources

- Processes the payment to the vendor and charge the expense to the correct account.
- Maintains documentation of purchases and payment assigned to sponsored projects.

Approved by:

Waleska Crespo

Waleska Crespo, DrPH

February 12, 2020

Date