

CITY OF URBANDALE, IOWA
PURCHASING POLICY AND PROCEDURES MANUAL
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INTRODUCTION

The Purchasing Policy and Procedures Manual was developed to explain the purchasing system used by the City of Urbandale for non-public improvement projects, as defined by Iowa Code Chapter 26.2. The manual will outline the responsibilities and duties of the City Manager, Finance Department and the user departments. The manual will first explain the policies that guide the purchasing process. The policies seldom change and provide the governing principles and courses of action to follow. The detailed procedures and instructional statements will be presented after the policies. In general, the purchasing system used by the City is not centralized. This means that user departments independently purchase items needed for their operations. The City does not have a central purchasing department which buys items in bulk for storage until needed by the user departments.

The intent of the Urbandale City Council and City staff is to buy materials, supplies and services of high quality at a reasonable cost. All purchasing actions engaged by the City should be fair, impartial, and free from impropriety or the appearance of impropriety. All qualified buyers and sellers shall have access to compete for City business, and no reasonable offer shall be arbitrarily excluded.

The purchase of supplies, equipment, construction, and services that include any federal program funding must also follow Appendix B. Please consult the Finance Dept. when before expending federal funds to ensure compliance with 2 C.F.R. 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

This manual is applicable to all operating departments of the City. The governing board for the Library has elected to follow these procedures in lieu of creating their own.

POLICIES

1. ROLE OF THE CITY MANAGER

By law (Iowa Code section 372.8e), the City Manager as chief administrative officer shall:

“Supervise the performance of all contracts for work to be done for the City, make all purchases of material supplies, and see that such material and supplies are received, and are of the quality and character called for by the contract.”

In the City of Urbandale, department directors work independently when making purchases. If the proposed purchase is greater than \$10,000, department directors work with the project consultant or contractor to determine the acceptability of materials, supplies, or services provided and will follow the procedures outlined in this policy. The City Manager will direct the Finance Department and Accounts Payable Clerk to review all invoices for materials, supplies or services prior to payment. Any purchases that qualify as a public improvement, as defined by Iowa Code Chapter 26.2 are subject to separate regulations. See the City of Urbandale’s Public Improvements Policy and Procedures Manual for further guidance.

2. PURCHASE ORDERS (PO)

The department prepares a PO requisition to obtain a PO. The requisition identifies the vendor, item, estimated cost, and the department’s line-item account which will be used to pay for the item. Requisitions, along with all required bid forms, are forwarded to the Finance Department for review prior to issuing a PO. A PO should always be requested, and the PO number received by the department prior to charging any materials, supplies, or services to be billed to the City. This excludes any item under the minimum cost threshold set forth in Appendix

A. A PO is not required for payments due under an on-going service contract, or a public improvement project which has been approved by the City Council.

Each PO is generated with a unique document number, and saved electronically with all supporting documentation, with an electronic copy provided to the Department. The Finance Department retains the PO with the original department request and bid information within the New World accounting system. Once final documentation and invoices are received with department approval, items are matched up and this packet becomes part of the permanent financial file. At the end of each fiscal year, payment packets are randomly selected and reviewed by the external auditors to verify completeness of the supporting documentation for each purchase.

3. IOWA PREFERENCE GIVEN

By virtue of statutory authority, preference will be given to products and provisions grown and produced within the State of Iowa. The purchasing department shall make every effort to support Iowa products when making a purchase. Tied responses to solicitations, regardless of the type of solicitation, shall be decided in favor of the Iowa products.

Iowa Code, Chapter 73.1, Preference Authorized:

“Every...city, and every person acting as contracting or purchasing agent for any such...governing body shall use only those products and provision grown and coal produced within the state of Iowa, when they are found in marketable quantities in the state and are of a quality reasonably suited to the purpose intended, and can be secured without additional cost over foreign products or products of other states...”

Urbandale-based companies (meaning those headquartered in Urbandale) will also be given preference in competitive quotation and competitive bidding situations (for items over \$2,500). If an Urbandale-based company's bid is within 5% of the low-bid (up to a maximum differential of \$5,000), and all other specifications of the request for proposal are met by both companies, the Urbandale-based company will be awarded the contract.

This section does not apply when funds being expensed may include direct or indirect federal funding, pursuant to 2 C.F.R. 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards.

4. COOPERATIVE PURCHASING

The City Manager may initiate or participate with other governmental bodies, including the State of Iowa, in cooperative purchasing. This may take place either through the use of the Iowa Code Chapter 28E for intergovernmental agreements or utilization of a contract clause. This would allow a legal purchase at the cost designated in another entities contract, in the best interest of the City, notwithstanding any provisions of this manual to the contrary. Utilization of any existing state or federal government contracts would satisfy bidding and quotation procedures under this policy.

5. CONTRACTS

Caution should be used when considering contracts for City expenditures. For purposes of this policy, contracts will fall into two categories: 1) service-oriented contracts, or 2) product purchase-related contracts. A product purchase-related contract is one that is either leading to a physical purchase of a tangible product (ie: copier, vehicle, software) or that stems from the purchase of a tangible product (ie: the maintenance contract on a copier). A routine product purchase will generally not have a contract unless the item has lead-time, needs a down payment, or is not an immediate delivery item. Signature for acceptance of a routine bid is not considered a contract for this purpose. A service-oriented contract is one that is purchasing the use of people and their expertise. While there may be some end work-product that results from a service-oriented contract (ie: reports), the primary engagement is for work being performed.

For the 2 categories, the following guidelines will apply:

1. Service-oriented contracts:
 - a. If total cost of contract is \$25,000 or greater, it must be approved by City Council prior to entering into the contract, OR
 - b. If the contract term is for more than one year, and the annual cost exceeds \$5,000 per year of the contract, it must be approved by City Council prior to entering into the contract.
2. Product purchase-related contracts:
 - a. If the contract requires the City to commit to a purchase of \$25,000 or more, it must be approved by City Council prior to entering into the contract, OR
 - b. If the contract term is for more than one year and requires costs of \$5,000 or more per year of the contract, it must be approved by City council prior to entering into the contract.

The City Attorney should review any contracts meeting the Council approval threshold prior to Council approval. Contracts may be taken to City Council for approval if requested by either party, even if outside required thresholds. Council may either sign the contract as approved or authorize a specific staff person to execute the contract on the City's behalf. Once the contract is approved, expenses under the contract provisions do not require purchase orders.

Contracts entered into for the expenditure of federal funds should also follow the contract pricing requirements found in Appendix B. 2 C.F.R. 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards limit the use of certain contract pricing methods, as well as require certain estimates and analysis. Please consult with the Finance Dept. to ensure compliance with these requirements.

6. COMPETITIVE BIDDING REQUIREMENTS

All purchases of, and contracts for, supplies and contractual services, for an estimated cost of \$10,000 or more, except as specifically provided herein, shall be based wherever possible on competitive bids. Utilization of any State or Federal bid contracts or similar cooperative purchasing contract that follows competitive bid procedures will satisfy the competitive bidding requirements of this policy,

When expending federal funds, utilization of State or Federal bid contracts does NOT satisfy 2 C.F.R. 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards. Refer to Appendix B for detailed requirements related to the competitive bidding requirements. Consult with the Finance Dept. to ensure compliance with these requirements.

All requests for proposals for materials, products, supplies, provisions, and other needed articles and services to be purchased at public expense shall not knowingly be written in such a way as to exclude any company capable of filling the needs of the purchasing entity from submitting a responsive proposal. Whether or not stated in the Request for Proposal, the City may consider life cycle costing analysis, and may give weight to the value of standard facilities and equipment, in selecting a vendor.

Exceptions to the competitive sealed bidding requirements include items valued under \$10,000, and emergency purchases. Some professional services and professional service contracts may also be excluded, subject to the items noted in section 7 below.

The City Manager may request a vote by the City Council exempting specific opportunities or conditions. Approval of an exemption of this requirement shall be a simple majority vote by the Council.

7. PROFESSIONAL SERVICES QUALIFICATIONS CONSIDERATION

For purposes of this policy, professional services shall be those services being provided by a person with an advanced/specialized degree, such as a CPA, lawyer, architect, engineer, actuary, or in some cases a highly specialized consultant.

The intended solicitation of professional services by itself does not necessarily exclude City staff from following bidding procedures noted in this policy. If a professional service is readily available in the marketplace (such as several engineering firms in the area), staff should exercise good judgment in obtaining more than one bid for the service. Staff may establish minimum qualifications (such as experience) for those professional service firms to be evaluated. These factors can be considered when making the selection of a professional service provider, thus the selected vendor may not necessarily be the lowest cost bid. If the professional service is anticipated to be more than \$10,000, a formal RFP/RFQ process shall be completed. City staff should use quantifiable criteria to evaluate all RFP/RFQs.

8. SALES TAX EXEMPTIONS

Under Iowa Law, (Code of Iowa section 422.45.7), the City of Urbandale is exempt from tax in the case of sales of articles purchased for the City's exclusive use. Additionally, the City agrees to pay tax, including interest, on such articles to the vendor or will reimburse the vendor for any tax, including interest, assessed by the State government.

9. EMERGENCY EXEMPTIONS

This policy may be circumvented if a situation arises that meets any of the following emergency procurement conditions:

1. the situation threatens public health, welfare, or safety; or
2. there is a need to protect the health, welfare or safety of persons occupying or visiting a public improvement or property located adjacent to the public improvement; or
3. the department must act to preserve critical services or programs; or
4. the need is a result of events or circumstances not reasonably foreseeable.

If any of these situations occur, purchases of emergency need items may be made without approvals required by this policy. At the conclusion of the situation, formal documentation will be required by staff participating in the event to outline the occurrence, and justify the expenditures made under the emergency exemption. These exemptions will be submitted to the City Manager and if costs exceed \$10,000, to City Council for approval.

When using federal funding in emergency situations circumvention of the procurement policy is not allowed, until consultation with the Finance Dept. has occurred.

10. ECONOMIC DEVELOPMENT ACTIVITIES

The City understands that in order to market and solicit business opportunities for economic development within Urbandale, reasonable resources will need to be available to conduct meetings and provide information to such prospective entities. Any expenses related to economic development activities will be subject to the same provisions set forth in this document, including meal allowance maximums per person, as outlined in the City's Travel Policy. All receipts shall be retained and submitted for normal payment processing. Expenditures will be coded to the appropriate account and documentation of the public purpose of the expenditure will be recorded. The City Manager will approve expenditures prior to payment.

11. LIBRARY COLLECTION ACTIVITIES

The City recognizes that the Library Board, under Urbandale Code section 32, has operational control of all aspects of the Library's affairs. However, in lieu of creating a separate purchasing policy, the Library operates as any other department of the City and chooses to follow the City's procedures for purchasing as laid out in this policy, with two main alterations. First being that the purchases related to collections materials (books, media, or other patron materials that are checked out) are not subject to bidding requirements as laid out in this policy. While the Library is expected to evaluate purchases of collection items and get the best available pricing, there is not a requirement to document pricing with every order. Secondly, any collection-related purchases are not required to have a purchase order, regardless of the size of the order. For all other non-collection purchases, the Library follows the purchasing policy as outlined in this document.

**APPENDIX A
PURCHASING PROCEDURES FOR DEPARTMENTAL BUDGET ITEMS**

- 1) For all purchases verify that the item is a budgeted item for your Department.
- 2) Employee Reimbursements:
For an item under \$100, an employee may purchase the item with personal funds and retain the receipt in order to be reimbursed, including sales tax. The receipt must be approved as noted in #8 below and turned into the Finance Department for reimbursement. Reimbursements can not be approved by the employee being paid.
- 3) Determine the process necessary for your budgeted item purchase based on the total dollar amount of the item(s) to be purchased - Note that the total cost should be considered when evaluating the below thresholds and in determination of final vendor selection. Total cost includes shipping/handling fees and transportation surcharges.

Under \$2,500	Retain receipt & turn in for Department approval and coding
\$2,500 - \$10,000	3 written quotes received, documented & PO # received before purchase
\$10,000 - \$25,000	Competitive bid process, documented & PO# received before purchase
\$25,000 and above	Competitive bid process, documented & requires City Council approval before PO is issued

Exceptions – items that need POs REGARDLESS of dollar amount:

The above thresholds are applicable for all items purchased EXCEPT the following unique situations, where a PO will be needed regardless of dollar amount:

- Any vendor that requires a PO # prior to purchase (ie: MAC/Youth in Parks admissions/events)
- Ongoing or long-term purchases that will have multiple shipments (over a period greater than 30 days) to fulfill the whole order (ie: bulk fertilizer, salt, ammunition, etc.)

Exceptions – items that DO NOT need POs REGARDLESS of dollar amount:

The above thresholds are applicable for all items purchased EXCEPT the following situations, where a PO is not needed regardless of dollar amount:

- Insurable accident losses that have been reported to the City's insurance broker. Staff may use any of the available repair vendors recommended by the broker or currently used by the City for similar equipment.
 - Equipment repairs that are unscheduled (ie; sudden powertrain failure). Staff should use known City vendors that are routinely handle similar repairs.
 - Annually bid items that price is honored for remainder of the year (ie: playground mulch is bid once per season, and that low bid is applied to subsequent purchases). Bids and PO are not required for each subsequent purchase, but date of original bid should be noted on subsequent invoices.
 - Professional service contractual costs that have already been approved by the City Council, including real property transactions (ROW, easements, land, parkland) and public improvement-related contracts (engineering, architectural, inspections, etc)
 - Monthly utility or routine monthly maintenance-related expenses.
 - Library collections-related purchases (ie: books, DVDs, CDs, audio books, or other items available for checkout to patrons)
 - Travel and training costs shall be consistent with the City of Urbandale's Travel policy guidelines but do not require a PO.
- 4) Complete the appropriate type of quote/bid documentation required in #3 above, then submit a PO requisition (phone, fax, email or hard copy) along with the quote/bid documentation to the Finance Department for the purchase and wait to receive a PO number prior to making a purchase.
 - 5) Departments expending federal funds must actively seek out 3 to 5 "targeted small business" to send quote and bid request to. This is a federal requirement that must be adhered to. Document in detail the work performed to identify qualified vendors. Consult with the Finance Dept. to ensure compliance with this requirement.
 - 6) The Finance Department will issue an electronic copy of the requested PO. The PO may be retained by the Department for its records.

- 7) After purchasing the item: attach the invoice or store receipt to a copy of the PO form. If a packing slip/work order document is received, retain all documentation with the PO until final invoicing is received. The PO should not be returned to the Finance Department without a final priced invoice attached.
- 8) Changes can be made on the front of the PO if necessary.
 - a. Departments should verify that the vendor address on the PO matches the remittance address on the final invoice.
 - b. If the final price of an item is different than the PO amount, the correct pricing should be marked on the front of the PO. General ledger coding should also be verified as correct.
- 9) All POs should be approved by the Department Director, or their designee, and signed at the bottom before returning to Finance Department. If there are any special directions required for payment (ie: check is to be returned to the department for hand delivery, etc.); those directions must be clearly indicated on the front of the PO and initialed by the Department Director.
 - a. For items less than \$2,500, the invoices/receipts should be stamped on the document itself with the "Approved for Payment" stamp and all fields completed. If the invoice receipt is smaller than a full sheet of paper, the document should be taped onto a full sheet of paper.
- 10) Unapproved PO's/Invoices or items missing supporting documentation will be considered incomplete and will not be paid. The Finance Department will return any incomplete items to the department for completion.
- 11) Responsibility for purchases within each department rests with the Department Director.
 - a. If the Dept. Director chooses to designate approval authority for purchasing, a listing shall be provided to the Finance Department to ensure proper approval is obtained. Such listing shall include:
 - i. name(s) of designee(s),
 - ii. approval authority dollar limits,
 - iii. any purchase category restrictions, and
 - iv. any expense code restrictions.
 - b. Approval of the following items cannot be designated:
 - i. Travel, training and reimbursement to employees must be approved by Department Directors.
 - ii. Department Director travel, training and reimbursement expenses must be approved by the City Manager. City Manager travel, training, and reimbursement expenses in excess of \$200 must be approved by the Mayor. Items under \$200 can be reviewed and approved by the Finance Director.
 - c. Departments are responsible for submitting their invoices, PO requests and final approved packets to the Finance Department in a timely fashion as to avoid late fees or penalties from vendors. The **submission deadline for invoice payments is 12:00 p.m. each Tuesday the week prior to a City Council meeting.** Checks are run on Thursday, approved by Council the following Tuesday, and mailed on Wednesday.
 - d. For any department that utilizes an in-house charge account with a vendor (ie: Menards), that department is responsible for providing the Finance Department with a list of employees that is eligible to make purchases on the City's account. This list should be updated and resubmitted to Finance any time the department has a termination, retirement, or addition to the workforce.
- 12) Departments are not to separate purchases into smaller amounts to circumvent financial guidelines.
- 13) All items submitted for payment, regardless of cost, should be coded to an appropriate general ledger account. If the cost of a purchased item is to be split between departments that are not all under the purchaser's authority, and the total cost being allocated to any outside department is over \$250, the purchaser should notify (by phone or email) the department being charged of the fee. Each department is responsible for choosing a designated contact person within their department to receive these notifications.
 - a. This requirement is waived if the allocated costs are associated with a City-wide service contract (ie: building maintenance contracts).
- 14) The Finance Department is responsible for ensuring that departments adhere to this policy.
- 15) Repeated failure to follow the above guidelines by any individual will be reported to the City Manager and will be subject to disciplinary action if actions persist.

- 16) This policy may be amended, revised or modified as deemed necessary by the Finance Director or City Manager.
- 17) If a purchase warrants an exception to the above guidelines, an appeal may be made to the Finance Director. If approved, documentation of the specific situation must be included in written form with the invoice to outline why the exception was warranted.

PROCEDURES FOR OBTAINING BIDS

\$2,500 - \$9,999

Items \$2,500 to \$9,999 may be awarded by means of informal competitive bidding. All informal competitive bidding purchases more than \$2,500 shall be based on at least three competitive written quotes and shall be awarded to the lowest bidder in accordance with the standards set forth in this policy.

All informal competitive bids shall be obtained by the Department Director or designee by any of the written mediums discussed below and the Department shall maintain documents prescribed by this policy for all such transactions, and such records shall be open to the public for inspection. A copy of each bid received must be attached to the PO request. The written quotation identifies the lowest bidder meeting specifications, subject to the Urbandale-based company provisions outlined in Section 3 of this policy. Authority to place an order is given once the purchase order has been issued.

If after contacting 6 or more vendors, a purchaser is unable to obtain the 3 required quotes, the purchaser may document the vendors contacted and proceed with the process noted above. The City Manager and Finance Director always reserve the right to review each quotation, obtain additional bids if deemed necessary, and verify prices with the named vendors.

Written quotes can be accepted in a variety of different mediums but must clearly identify the vendor information associated with the pricing (IE: email, fax, internet pricing lists, traditional catalog price lists, brochures, flyers). Pricing should include all applicable charges and shipping/handling fees.

When obtaining bids/quotes for the expenditure of federal funding, Targeted Small Businesses (small, women-owned, and minority owned) must be solicited when there are potential sources. Departments must seek out 3 to 5 TSBs to send bids and quotes to, and document their efforts. The Iowa Economic Development Authority maintains a directory of these businesses at <https://www.iowaeconomicdevelopment.com/Business/tsb>. Consult with the Finance Department to ensure compliance with the requirements of Appendix B.

\$10,000 and above

Approval for purchases expected to exceed \$10,000 will follow a competitive bidding process as outlined in Section 6 of this policy. The item to be purchased must be approved by the Department Director and the City Manager. Once bidding is, if the item is under \$25,000, a PO can be requested as noted above. If the purchase is \$25,000 or more, the results must be submitted to City Council for final approval before the PO is issued and purchase completed. Once items have been approved by City Council, all documentation (Council letter and bids) should be forwarded to Accounts Payable for issuance of the PO.

Whenever practical, purchases expected to exceed \$10,000 must have a minimum of three prospective bidders and shall be bid on by formal, written contract. Bid specs should not be written to favor any specific vendor or product to ensure the bid has an open process. After due notice is given, the lowest responsible bidder will be chosen, subject to the Urbandale-based company provisions outlined in Section 3 of this policy.

When obtaining bids/quotes for the expenditure of federal funding, Targeted Small Businesses (small, women-owned, and minority owned) must be solicited when there are potential sources. Departments must seek out 3 to 5 TSBs to send bids and quotes to and document their efforts. The Iowa Economic Development Authority maintains a directory of these businesses at <https://www.iowaeconomicdevelopment.com/Business/tsb>. Consult with the Finance Department to ensure compliance with the requirements of Appendix B.

Procurement/Debarment

For any federal contracts over \$25,000, it is the purchaser's responsibility to verify the vendor is not debarred from doing business with the federal government. This can be confirmed by 1) performing a vendor search at <https://www.sam.gov/SAM/pages/public/searchRecords/search.jsf>. If no results are returned, you must have the vendor self-certify that they are not debarred.

Documentation must be retained showing that debarment was tested. This should consist of screen shots of sam.gov, and/or emails from the vendor.

APPENDIX B FEDERAL PROGRAM FUNDING – 2 CFR; PART 200

This appendix applies to the purchase of all supplies, equipment, and construction and services of and for the City that include any federal program funding. In regard to any such federal programs, all procurement will be done in accordance with 2 CFR; Part 200. Chapter 26 and Section 331.341 of the Iowa Code will be followed on all applicable purchases. When federal requirements conflict with local or state requirements, the most restrictive requirements will be followed.

METHODS OF PURCHASING

Purchasing under federal program funding will be made in accordance with the City's Purchasing Policy and Public Improvements Policy, which both are below the thresholds in 2 CFR; Part 200.320 (a-e).

CONTRACTING WITH SMALL AND MINORITY BUSINESSES, WOMEN'S BUSINESS ENTERPRISES, AND LABOR SURPLUS AREA FIRMS

Purchasing under federal program funding will be made in accordance with 2 CFR; Part 200.321. This includes:

1. Assuring that small and minority businesses, and women's business enterprises are solicited whenever there are potential sources;
2. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority owned businesses, and women's business enterprises;
5. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
6. Requiring the prime contractor, if subcontractors are to be let, to take the affirmative steps listed in 1 through 2 above.

CONTRACT PRICING

1. The cost plus a percentage of cost and percentage of construction cost method of contracting shall not be used.
2. The City shall perform some form of cost/price analysis for every purchase, including contract modifications, amendments, or change orders. The City shall also make an independent estimate prior to receiving a bid or proposal.
3. The City shall negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed. In determining a fair and reasonable profit, the City must consider the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance and the industry profit rates in the surrounding geographical area.

RECORDS

The City shall maintain records sufficient to detail the significant history of a purchase including the rationale for the method of purchase, selection of contract type, contractor selection or rejection, and the basis for the contract price. In accordance with 2 CFR; Part 200.324:

1. The City must make available, upon request of the Federal awarding agency or pass-through entity, technical specifications on proposed purchases where the Federal awarding agency or pass-through entity believes such review is needed to ensure that the item or service specified is the one being proposed for acquisition.
2. The City must make available upon request, for the Federal awarding agency or pass-through entity pre-purchase review, purchase documents, such as requests for proposals or invitations for bids, or independent cost estimates, when:
 - a. The City's purchasing procedures or operation fails to comply with the purchasing standards in this Part;
 - b. The purchase is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation;
 - c. The purchase, which is expected to exceed the Simplified Acquisition Threshold, specifies a "brand name" product;
 - d. The proposed contract is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or
 - e. A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

3. The City is exempt from the pre-purchase review in paragraph (2) of this section if the Federal awarding agency or pass-through entity determines that its purchasing systems comply with the standards of this Part.
 - a. The City may request that its purchasing system be reviewed by the Federal awarding agency or pass-through entity to determine whether its system meets these standards for its system to be certified. Generally, these reviews must occur where there is continuous high-dollar funding, and third-party contracts are awarded on a regular basis;
 - b. The City may self-certify its purchasing system. Such self-certification must not limit the Federal awarding agency's right to survey the system. Under a self-certification procedure, the Federal awarding agency may rely on written assurances from the City that it is complying with these standards. The City must cite specific policies, procedures, regulations, or standards as being in compliance with these requirements and have its system available for review.

AWARDED CONTRACTS

1. The City will not award a contract to a party listed as debarred, suspended, or otherwise excluded in the System for Award Management (SAM). www.sam.gov
2. Contracts awarded shall contain the applicable contract provisions described in 2 CFR 200.326 and Appendix II to Part 200.
3. The City's Conflict of Interest, Code of Ethics and Gifts Policy must meet standards set forth in 2 CFR: Part 200.318 (c) (1).