



Purchasing Guidelines

August 2022

This guide has been designed to give you a brief overview of the purchasing requirements of the college. Detailed procedures are contained on the Columbia Gorge Community College Purchasing

<https://www.cgcc.edu/purchasing/purchasing-information-cgcc-employees>

The Community College Rules of Procurement (CCRP) were drafted by participating statewide community college representatives.

The function of purchasing is to serve the mission of the College by providing necessary supplies, equipment, and services in a manner that encourages competition without prejudice and to maximize educational value for every dollar expended. Commonly used items will be standardized whenever consistent with educational goals and in the interest of efficiency or economy.

The Board of Education serves as the College's Local Public Contract Review Board. The Board utilizes applicable Oregon administrative rules and statutes and the Oregon Community Colleges Model Rules of Procurement.

Ethics/Conflict of Interest

In accordance with BP 7115 "Employee Code of Conduct", all of the college's employees, officers, agents or otherwise, irrespective of whether they are compensated for such services, are considered "public officials." (ORS 244.020). Essentially, receiving personal gain through your public employment is prohibited. Be wary of "gifts," special "deals," back-door selling, kickbacks, bribes, discounts, and incentives that are offered to you as a public employee. These items may be perceived as personal gain. Always avoid the intent and/or appearance of unethical or compromising practices. Violations of the code of conduct are subject to disciplinary action, up to and including termination.

CGCC Board Policy GBCA contains additional guidelines on Conflict of Interest and Nepotism. These and additional CGCC policies may be found at <https://www.cgcc.edu/policies>. Employees who perform or approve procurement functions are expected to be aware and follow these policies.

The following guidance is for training purposes only and does not supersede any policies of CGCC or federal and state regulations. In the event of a conflict, those policies and regulations will supersede these requirements.

Purchasing on behalf of the college is delegated to select authorized individuals at the college. Employment does not indicate authorization to purchase or enter into contractual agreements on behalf of the college. Only an individual employed by the college, in a full-time or part-time, regular status is authorized to purchase on behalf of the college. Individuals identified as temporary or independent contractors are not authorized to purchase on behalf of the college.

Always keep in mind we are spending taxpayer dollars! If you're not sure – don't make the purchase. The college is audited every year to review how we use our financial resources.

How can you determine if a purchase is appropriate?

Are the expenditures...

...for official College business?

...is the purchase within budget?

...in the best interests of the College?

...the most effective way to accomplish official College business?

...in compliance with applicable policies, laws, rules, and regulations?

...directly beneficial to the department being charged?

...reasonable?

Purchasing on behalf of the college should be conducted following the full rules and policies outlined in The Community College Rules of Procurement (CCRP). Individuals must refrain from any private or professional activities that would create a conflict of interest between the individual and the college.

Procurement should promote positive supplier relationships through impartial practices and competitive bidding when required. Never solicit or accept money, loans, credit, prejudicial discounts, acceptance of gifts, entertainment, favors, or services from present or potential suppliers which might influence purchasing decisions.

Authorized limits. The procurement method selected is primarily based upon the size of the transaction. Individuals that have been delegated authority to purchase should do so within the following limits.

- **Micro-Purchases:**
 - All purchases over \$1,500 should be pre-authorized through the official procurement process and secure the required approvals prior to approval.
 - Deans or Directors have limited approval authority of \$2,500. Purchases over \$2,500 require Vice President approval.

- **Small-Purchases:** Purchases over \$4,999 require a minimum of three (3) documented quotes (See Splitting Orders/Fragmenting below) in addition to Vice Presidential approval. The purchasing specifics should be entered onto form P-1 “Procurement Process Documentation Form (\$5,000+) “and submitted with the quote documentation when entering the PO into the accounting system for approval.
- **Formal Procurements:** Pursuant to Board Policy, purchases over \$75,000 require Board approval and may require formal bid processes.

The accounting system may require additional purchasing approvals for coding and coordination in excess of this policy.

All purchases must follow the formal Purchase Order (PO) process and be recorded within the accounting system to ensure appropriate recording and tracking of the expense. A PO is a formal document approval resulting in payment upon receipt of an approved invoice. Purchase orders should be entered and approved prior to the purchase of the item (including those on credit cards) and not entered after the receipt of an invoice as this circumvents the objectives of the approval process. In addition, documentation of the supplier’s quotation and any other important communication should be uploaded along with the purchase order.

Payment for goods received should result following the receipt of the goods or services and an approved supplier invoice. Although, a purchase card (P-card) is routinely used to purchase goods or services prior to receipt, it is the responsibility of the cardholder to ensure receipt of the goods and maintain documentation of the receipt in the event of an audit.

Check Request

Payment is made for received goods and service upon submission of an invoice or expense receipt matching the terms of an authorized purchase order. Original receipts or invoices are required for payment or reimbursement. For reimbursement or payment of expenses where a receipt is not present a Check Request Form is required.

New vendors

Prior to making purchases confirm an existing purchase relationship exists with the vendor. Recognized vendors are listed within the procurement system. If a vendor is not listed you will be required to provide a current W9 from the vendor and work with the Accounts Payable Specialist to set up the vendor. This does not apply to purchases made by p-card.

Grants Funded Procurements

Many grants have special procurement rules and guidance in addition to federal (mainly 2 CFR 200) and state regulations. You are encouraged to contact your grant administrator, grant accounting coordinator and/or refer to your specific grant

agreement for guidance prior to proceeding in order to ensure compliance with all applicable rules. Procurement for grants or other non-general fund expenses are not exempt from bidding or other procurement rules. Federal grants can have additional requirements beyond Oregon law regarding documentation, competition, affirmative action, small business involvement, etc. As a result, purchasers and grant administrators need to be aware of the individual grant requirements when making and approving purchases.

Statewide Price Agreements/Contracts

As a member of the Oregon Cooperative Procurement Program we have access to hundreds of competitive Oregon State price contracts for a wide variety of goods and services. Check with Purchasing to see if there is a price agreement that could save the college money on your procurement.

Software and Technology

All software and technology purchases must be either sourced through the Information Technology (IT) department or approved for direct purchase prior to purchase. Email authorization will be required documentation to accompany any software or technology purchased by a department other than IT. Software and technology procurement have unique security, compatibility, and warranty concerns. Additionally, we seek to benefit from bulk or shared licensing at contracted or educational pricing whenever possible. The IT department is best positioned to evaluate purchases for compatibility and appropriateness to avoid duplication of similar licensing across campus. Standard processing time for technology or software requests require a two week notice in addition to fulfillment timelines. Software and technology installations are subject to the cybersecurity policies of the college.

Facilities or Construction Services

Purchases that may require changes to the physical space or utilities must be reviewed with and approved by the Facilities department prior to purchase. Costs required for any physical changes to the building are considered a part of the purchase cost and are the responsibility of the purchaser. For example, an individual purchase that requires a change to the building infrastructure may exceed the \$2,500 Dean or Director approval authority and require Executive approval.

Food

The Hook Café has first right of refusal for all food catered on campus. If your department or group is hosting an event on campus you must provide the Hook Café with the first opportunity to cater the event. This includes food purchased for resale, internal use, or the general public. Meals or food purchased with college resources should be for an approved official function or event. **Alcohol cannot be purchased using college funds.**

Green Purchasing

The goal of this policy is to reduce environmental impact by buying goods and services from manufacturers and vendors who share our commitment to the environment and sustainability. Green purchasing assigns environmental and social considerations as having equal weight with price, availability and performance in college purchasing criteria.

Obtaining Bids or Quotes

Obtaining bids or comparative quotes is a preferred practice to ensure an approximation of the pricing and services to be received. Quotes should be for equal or like products including variables such as shipping or delivery charges and any educational discounts available. Staff shall use care and discretion when obtaining quotations from vendors (e.g., pricing shall NOT be obtained for the purposes of leveraging deeper discounts—department staff are strictly prohibited from sharing vendors' quotations with competing vendors). This practice is unethical, biased, and unequivocally unacceptable.

The bid process is a formal and documented process required for purchases over \$75,000 conducted only by designated procurement agents.

Contracts

Pursuant to CGCC Board policy signature authority for any contracts or agreement is given to the President of the college. Employees cannot sign contracts or agreements on behalf of the college.

Sole Source Purchases

Pursuant to ORS 279B.075 determination of a sole source is based upon written findings in accordance with the provisions set forth in ORS 279B.075. APPROVAL must be obtained for a sole source purchase. Contact Purchasing for assistance.

Splitting Orders/Fragmenting

Splitting orders of like items or portions of a project with intent to circumvent competition or exceed one's delegated authority is prohibited (ORS 279B.065, 279B.070). Purchase should not be split between different funding sources without prior approval.

Public Records and Documentation

It is important that all documentation related to purchasing is sent to the business office and properly retained by the department purchasing. Pursuant to CGCC Board Policy and Oregon Revised Statutes, procurement documents are considered public record.

"Public record" means any writing containing information relating to the conduct of the public's business that is prepared, owned, used, or retained by a public body regardless of physical form or characteristics, including, but not limited to, handwriting, typewriting, printing, photographing, and every means of recording, including letters, words,

pictures, sounds or symbols, or combination thereof, and all papers, maps, files, facsimiles, or electronic recordings.

Note: Contact Human Resources if you receive a Public Records Request.

Miscellaneous

Personal services are expenses categorized as individuals performing services for the college. Caution should be used when pursuing expenses for personal services to avoid incurring substantial tax penalties and other liabilities. **APPROVAL MUST BE SECURED BEFORE COMMENCEMENT OF SERVICES.**

Vendors are encouraged to contact college personnel in an attempt to market their products; however, caution should be exercised by college staff to ensure the college is not committed to the purchase of any product or service without first following the procurement requirements illustrated in this handout.

Any inadvertent personal purchase must be immediately reported to Accounts Payable Specialist and reimbursement to the college should be made within 48 hours of discovery.

Avoid making purchases from foreign vendors. Foreign purchases can result in shipping delays, additional taxes, warranty, and return challenges.

FORMS

P-1 Procurement Process Documentation Form (\$5,000+)

P-2 Request for Quotation Form

P-2C Request for Quotation Form for Construction Related Projects

P-3 Sole Source Form (\$75,000 or more)

P-4 Purchase Delegation

P-5 Check request Form

ADDITIONAL DOCUMENTS AND POLICIES

- BP 7115 - Employee Code of Conduct (<https://www.cgcc.edu/sites/default/files/board-of-education/Policies/BP%207115%20-%20Employee%20Code%20of%20Conduct.pdf>)
- PART 200 - UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS (<https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II/part-200>)

- Purchasing Information for CGCC Employees
(<https://www.cgcc.edu/purchasing/purchasing-information-cgcc-employees>)
- CGCC Rules of Procurement (revised June 12, 2012) (chrome-extension://efaidnbnmnnibpcajpcglclefindmkaj/<https://www.cgcc.edu/sites/default/files/purchasing/rules-of-procurement.pdf>)

Glossary

Encumbrance	Recording a reserve or claim for an impending or expected expense. For example - request a purchase order to encumber the net value for 12 months of utilities reserving expected utilities within the budget.
Indirect Expense	An internal cost not assigned to a specific item or activity incurred while operating a grant or third-party activity.
Invitation to Bid	A solicitation document asking for submission of competitive, written, signed and sealed Bids in which specification, price and delivery (or project completion), are the predominant award criteria
Personal Service	Contracts which are primarily for a service and call for specialized skills, knowledge, and resources in the application of highly technical or scientific expertise, or the exercise of professional, artistic, or management discretion or judgment.
Purchase Order	An official document used by the Business Office to execute a purchase transaction with a vendor/supplier/contractor. (A Purchase Order is just one of many types of contracts or binding agreements.)
Quotation	The stating of a price for the purchase of a good or service.
Request for Proposal (RFP)	A solicitation document calling for competitive proposals/offers. The RFP process permits evaluation of the offer using pre-established criteria. Award of the contract on the basis of price may not necessarily be the predominant award criteria.
Sole Source Purchases	Purchase made without a competitive process, based on the justification that only one know source exists due to a single supplier or other unique variable that would prevent fulfillment by multiple suppliers or sources.
Splitting Orders/Fragmenting	Intentionally breaking down purchase or dollar value into two or more transactions to evade review or competitive authorizations limits.