

Santa Clara FireSafe Council

Purchasing Policy and Procedures

Policy

1. All SCFSC purchases must follow the applicable SCFSC Accounting Policies and Procedures.
2. All SCFSC purchases must be identified by grant (or other source of funding) using the Chart of Accounts in the SCFSC Accounting Policies and Procedures. No purchases may be made unless SCFSC has received the funds for the purchase.
3. All SCFSC purchases must be approved at an SCFSC meeting, or by a majority of the SCFSC Officers and Directors, or by the SCFSC President and CEO, before the purchase is made.
4. Since the SCFSC does not have any employees, facilities or indirect expenses, no SCFSC purchases are authorized for employee benefits, rent or indirect expenses. All administrative purchases must be directly related to and funded by grants or other sources of funding.
5. SCFSC purchases of equipment must be capitalized and depreciated following the provisions of the SCFSC Accounting Policies and Procedures. Federal Grant funds may not be used for equipment unless equipment is specifically included in the grant.
6. SCFSC supports free and open competition for all purchases. For pre-approved Hazardous Fuel Reduction (HFR) purchases contractor selections will be made by an Officer and a Grant Coordinator. All HFR purchases and purchases using Federal monies shall be in conformance with the current Federal Office, Management and Budget procurement procedures. All Purchase Orders shall include a do not exceed amount that is equal to or less than the pre-approved purchase amount. All HFR Purchase Orders must be approved by an Officer and a Grant Coordinator. All purchases that exceed \$3,000 (\$2,500 for Federal Grant purchases) require two or more bids and approval of vendor selection at an Officers and Directors meeting or by a majority of the SCFSC Officers and Directors unless an alternative vendor selection process is pre-approved at an Officers and Directors meeting. Vendor selection must take into consideration all factors including pricing, safety, availability, capabilities, timing and performance. This policy will be implemented following Paragraph 2 of the Procedure below.
7. All purchases made using federal grant funds must follow the restrictions and requirements of the individual grant agreements (see examples below).
8. The SCFSC Treasurer and Grant Coordinator(s) are responsible for maintaining the SCFSC purchasing records and supporting documentation. Documentation of the process for purchases, and bids and quotes, must be maintained for three years after the grant has been completed.

Procedures

1. The SCFSC Treasurer and Grant Coordinator(s) are responsible for implementing the procedures necessary to implement the policy above.

2. The SCFSC Treasurer is responsible for all purchasing activities which represent financial obligations for SCFSC including contractor agreements, purchase orders, SCFSC Credit Cards, and other authorizations and agreements. The President or Treasurer may delegate this authority to other Officers and/or the Executive Coordinator as needed to facilitate individual SCFSC purchasing activities. All purchasing activities must follow the policies above.
3. Documented telephonic, e-mail or other electronic forms of communication are acceptable.

Federal Grant Restrictions and Requirements

All purchases made using federal grant funds must follow the restrictions and requirements of the individual grant agreements including (for our 2013-14 grants, SCFSC is a Subrecipient):

Subrecipient and this Subaward are subject to the requirements of 2 CFR 230, Cost Principles for Non-profit organizations ... Subrecipient is responsible for ensuring that expenditures of federal funds are allowable. Unallowable costs cannot be paid with federal funds and they become the Subrecipient's sole responsibility. (14USFS-SFA0040 Agreement, Section A.2.)

In accordance with Federal law and U.S. Department of Agriculture policy, this institution (organization) is prohibited from discrimination on the basis of race, color, national origin, sex, age, or disability. (Section C.15.)

It is a national policy to encourage purchases with minority business firms. Efforts shall be made by Subrecipients to utilize small businesses, minority-owned firms, and women's business enterprises, whenever possible. Subrecipients shall take all of the following steps to further this goal. (Section C.17.):

1. Ensure that small businesses, minority-owned firms, and women's business enterprises are used to the fullest extent practicable.
2. Make information on forthcoming opportunities available and arrange time frames for purchases and contracts to encourage and facilitate participation by small businesses, minority-owned firms, and women's business enterprises.
3. Consider in the contract process whether firms competing for larger contracts intend to subcontract with small businesses, minority-owned firms, and women's business enterprises.
4. Encourage contracting with consortiums of small businesses, minority-owned firms and women's business enterprises when a contract is too large for one of these firms to handle individually.
5. Use the services and assistance, as appropriate, of such organizations as the Small Business Development Agency in the solicitation and utilization of small business, minority-owned firms and women's business enterprises.

Subrecipient and this Subaward are subject to the requirements of 2 CFR 180, Governmentwide Debarment and Suspension ... When appropriate during the term of the Subaward and when hiring a contractor/vendor, the Subrecipient also agrees to complete the debarment and suspension checks on potential candidates and the final selection. (Section C.21.)