



Policy Title: Procurement for Non-Capital Goods and Services		Former Policy Number: OP-0452	
Document Owner: Dustin Slodov		Approver(s): Angelique Richard	
Date Created: 10/16/2020	Date Approved: 02/05/2021	Date Updated: 02/10/2021	Review Due: 02/05/2024
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I. Policy

This policy applies to all Rush personnel associated with procurement related activities including requisitioning, order placement, approval authority, and receiving.

To provide control of Rush resources, to be able to properly account for any financial liabilities, ensure centralized procurement, contracting and item file maintenance; to reduce processing and acquisition cost; to enhance operational efficiencies and avoid duplicate purchases and payments

It shall be the policy that all non-capital purchases and contractual arrangements required for supplies, equipment and service agreements be reviewed, approved and executed by the appropriate supply chain personnel. This policy describes the various methods of placing orders for goods and services as well as the payment methods that are required to be followed to pay for the goods and services ordered.

To reference the policy for Capital purchases please see this link: [Procurement for Direct Capital Goods and Services](#)

Procurement for Non-Capital Goods and Services

A purchase order for goods or services is a legally binding contract which decreases the risk of liability to the organization. Rush is a tax-exempt organization and ordering goods outside of the Rush process will incur tax charges for which Rush is not obligated to pay.

Purchases of goods and services are required to be made on a purchase order issued through the requesting process. Orders must flow through appropriate financial authorization through the Enterprise Resource Planning (ERP) system, which is currently called Link (Lawson).

Placing orders directly with vendors is strictly prohibited. All orders must be placed through the ERP requisition center. Departments can contact the Rush Supply Chain team for guidance.

When purchasing intangible goods, such as service, maintenance of software needs, all requisitions must be accompanied by a contract or quote with Terms & Conditions approved by legal with an approved Contract Review Form documented and attached through the ERP.

Emergency Order

Exceptions to placing orders through the ERP exist in emergent situations. An emergent situation exists when the health or safety of patients or staff is involved and there is imminent



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- **Non-business hours emergency repair requests to critical equipment such as patient monitoring devices**
- **Medical devices brought into the hospital to avert clinical emergencies in a high-risk patient care situation**

Failure to anticipate a need is not in itself considered a legitimate emergency.

If an emergency order is necessary, the requester must obtain a copy of the invoice and packing slip from the vendor and complete a purchase requisition using PO Code BYP. Once a PO number is assigned to the requisition, the requester must document the PO number on the invoice, and send to Accounts Payable for payment processing.

Non-Purchase Order or Expense

There are circumstances that may not require a Purchase Order. Examples include: Fees and Permits, Government Payments, Utilities, Membership dues, Registrations, Books, Publications, Honorariums (speakers), Donations, Lease Payments, Benefit Payments, Student Stipends and Reimbursements, Garnishments, Research Participant Payments, Catering, and Restaurants.

A [Check Request Form](#) must be completed for all non-PO expenses that are not billed in a standard invoice format.

Travel and Employee Reimbursements

Expense reimbursements for Rush employees and employed faculty who incur out-of-pocket expenses while conducting business for Rush that would otherwise not be incurred. This is processed by the Payroll department.

Reference the policy for [Travel and Employee Reimbursement](#)

Requesters

Managers and Directors with budgetary responsibilities have the ability to determine the authorized personnel to act as requesters on behalf of their departments/accounting unit. All non-employee requesters must be routed through financial approval and are subject to additional auditing. To access the form to authorize a new requester, please see this link:

[Requester Add form](#)

Purchasing reserves the right to request the removal of requesters from the requesting process based on quality of requests placed. Corporate Finance credentials these users in the ERP system. Prior to being submitted for credentialing, the requesters must have passed the online



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Buyer Review

Once the requester has placed their requisition in the ERP Requisition Center (RQC), the requisition may be subject to Buyer Review.

Any Special or Service items that are requested require Buyer Review. As the first reviewer in the Requisition Process Flow the Buyer is required to check:

- Pricing
 - Vendor Catalog Number
 - Vendor Selection
 - Item Type
 - Quantity
 - Requisition coding (i.e. PO Code and Account selection)
 - Required Documentation is Attached (i.e. Attachment A/contract)
 - Minor equipment expense accounts selected correctly to route to IS/MCE/CES
- Once a purchase requisition is submitted, Purchasing may, at their discretion, return the requisition to the requester with a note to switch the vendor to an alternate vendor or distributor. Purchasing will determine the appropriate vendor based on the standard or contracted vendor for a particular product line or service. Ongoing, Purchasing in cooperation with end-user departments should review products and services that best meet the enterprise supply chain goals and the end-users needs/requirements.

If the Buyer determines requisition edits are required, it will be returned to the requester. When the requisition is re-submitted it will re-enter the Approval Process Flow. This ensures that if the requisition was not entered correctly upon the 1st attempt, the appropriate reviewers will have an opportunity to re-approve the requisition.

Departmental Review

After Buyer Approval is achieved, the requisition may be subject to Departmental Review. Departmental Review is required if the requisition contains a specific expense account or vendor that must be scrutinized to ensure compliance with departmental, hospital safety, and/or cybersecurity policies.

Account Number Review:

Account	Approval Needed
56240- Minor Equipment MCE	MCE – Medical Center Engineering



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56245 – Minor Equipment CES	CES – Clinical Engineering Services
56247 – Minor Equipment IS	IS – Information Services
51305 – Hazardous Materials	Occupational Safety

Financial Approval

After Buyer and Departmental Approval (if necessary), the requisition then routes through financial approval. This is the final requisition review level. Requisitions route for approval based on the accounting unit and the dollar value of the request. See the standard approval grid below:

Dollar Amount	Approval Needed	Leadership Level (suggested)
\$0 - \$2,500	Level 1	Administrator
\$2,500 - \$25,000	Level 2	Manager
\$25,000 - \$100,000	Level 3	Director
\$100,000 +	Level 4	AVP or VP

Financial Approvers cannot approve his/her own requisition; the request will escalate to the next approver, regardless of dollar level authority.

There is a 48-hour escalation process, whereby if a requisition remains at an approval level for two business days, it is automatically escalated to the next level. This process will repeat until the requisition reaches the Level 4 approver. If no action is taken after 5 business days at the final approval level, the requisition will be returned to the requester.

All Accounting Units must have a level 2 and level 4 approver defined.

At each level an Alternate Approver can be assigned. Alternate Approvers must have the same or higher approval authority. An Alternate Approver cannot be on the approval table under a different level.

Proxy Approvers

All approvers must select a proxy or substitute (with the same or higher approval authority) when on leave or PTO. A delegated proxy must be an existing RQC Approver. If proxy is not set, the requisition begins escalation process as described in the Financial Approval Policy section. Proxy approvers may be set by visiting the ERP homepage. Proxies may only be assigned for a maximum of 4 weeks without prior approval from Supply Chain.

To access the proxy set up guide, please see this link:

<https://insiderush.rush.edu/Corporate/Link/Documents/Set%20a%20Delegated%20Proxy%20Approver.pdf>

Vendor/Products Sourcing



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The procurement function consists of business processes related to the acquisition of goods and services for the enterprise. Performance, quality, suitability, delivery, and service are factors considered in buying.

Sourcing

The Supply Chain Sourcing team can facilitate departments' search for best in class pricing and service with respect to clinical and non-clinical needs. The sourcing team is tasked to seek available Group Purchasing Organization (GPO) contracts available to Rush, obtain courtesy pricing, or issue a local contract price agreement. The sourcing team may, at their discretion, issue a Request for Quote (RFQ) or Request for Proposal (RFP) at any time to regularly examine the market price of a goods & services. The primary GPO is leveraged for best in class pricing where possible. It is highly recommended that departments reach out to the Supply Chain Sourcing team before searching for deals on goods and services independently.

Federal Research Grants Sourcing (See Exhibit 1)

New [Clinical] Products

If a clinician wishes to use a new clinical product, they must inform their Supply Chain Sourcing Manager. Sourcing Managers, in conjunction with the appropriate Clinical Manager, may authorize an approval for a product. Products imposing an increase in spend (generally anything over \$1,000) annually or affecting cost per case revenue is subject to review for approval at the respective Technology and Value Analysis Committee.

Depending on the category of product, the request will be submitted to the appropriate Sourcing Manager and New Technology/Value Analysis Meeting. Once the Sourcing Manager is made aware of the new request, they will work with the vendor representative to set up a no charge trial. After the new product has been used in a case and assessed by the clinician, the clinician must then inform the Sourcing Manager of the ongoing need for the product. The sourcing manager will then collect the needed information to facilitate discussion on the need during an upcoming Value Analysis meeting where the clinician may present their need. If the requesting clinician fails to process the form and make a formal request, their product is unlikely to be stocked or approved for use. New line items or SKUs within a product line are excluded from this approval process.

New Vendors and Vendor Reactivation

If a department wishes to conduct business with a new vendor, not in the ERP, the requester must submit a New Vendor Request form available on the ERP homepage. The Purchasing team reviews if the vendor conflicts with an existing contracted vendor for the good/service requested and then submits all passing vendors to Corporate Finance for further validation and creation. Finance reviews the vendor master on an annual basis and may deactivate vendors



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Per Corporate Compliance and Internal Audit, in order to conduct business with a new vendor or add a vendor to the ERP system, it must first clear the Federal, State, and Local exclusion lists as a vendor in good standing with agencies. We are prohibited from conducting business with a vendor who appears on these exclusion lists.

Independent Contractors

Independent Contractors must be paid via the Purchase Order process. To hire a new independent contractor, requesters must follow the new vendor request process and submit the new vendor request form found on the ERP homepage. Additionally, the following items should be added as an attachment with new vendor requests and subsequent Purchase Requisitions:

- Independent contractor form that has been approved. This check is to ensure the independent contractor is not currently Rush employee.
- Independent contractor agreement including a Business Associate Agreement, which is required if protected health information (PHI) will be shared with the independent contractor, that has been approved by the appropriate Vice-President or Senior Vice President and signed by the independent contractor
- Contract Review Form (formally Attachment A) with approval signature from Rush Legal
- Certificate of Insurance matching the requirements of the approved independent contractor agreement, if necessary

Refer to Independent Contractor Operational Policy and Procedure located at Inside Rush.

Receiving

Most goods are shipped to the Receiving department and later delivered to the client department. The matching of each item to the PO is the responsibility of the end user. Should the client department refuse the goods (although this is not typical), then the goods are held at the receiving dock and again the buyer is contacted so a return good authorization and credit can be arranged.

For offsite purchases and other certain orders, (such as office supplies or other items that may be needed quickly), the Purchasing department may have an agreement with that vendor for desk top delivery. During the vendor payment approval process, the client department confirms receipts for these goods.



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Individual departments should not arrange desktop delivery directly with a vendor - all such requests must be processed by Purchasing.

Tangible goods must be received to authorize payment of any associated invoices. If an invoice is entered & the goods are not received, the Receiving Department will attempt to contact the Requester to verify delivery. If the requester is unresponsive after 48 hours, the Receiving Department has the right to receive the goods so the invoice can be matched and paid.

Personal Packages

Personal packages should not be shipped to the Rush Receiving dock under any circumstances. Personal packages will not be prioritized and the Receiving dock is not liable for damaged or missing product.

Large Deliveries

If expecting a large or white-glove delivery, please contact the Receiving dock 48 hours prior to expected delivery date to coordinate delivery to unit. The Receiving department is open from 8am-4pm Monday through Friday. Receiving reserves the right to decline a large shipment if not coordinated ahead of time.

Offsite and Direct Delivery Receiving

In the event that a tangible good is not processed and delivered by the Receiving Department, the requester is responsible to receive the goods.

For requisitions that originate from RQC the requester must receive the goods through the Receiving Self Service application.

Purchasing and Receiving reserves the right to request the removal of requesters that consistently fail to receive offsite & direct deliveries.

Exceptions that do not require requester receiving:

- Desktop delivery of office supplies from the current prime vendor
- Direct delivery of medical gases from the current prime vendor
- Desktop delivery of standard & custom printed material from the current prime vendor

Returns, Exchanges, and Credit Memo Processing

In the normal course of business, certain goods may be returned as they may not fully meet the needs of the end user or requesting department. All returns are initiated by the owning department through the Item Return Form located on the ERP homepage. The assigned Buyer processes the Return Form and obtains a Return Good Authorization (RGA) from the vendor. On-site goods are to be returned through the Receiving dock. The Receiving team processes each return with an RGA, and sends the item(s) back to the vendor. Offsite goods are



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For item exchanges, an Item Return Form must be submitted and a new Requisition created to generate a PO for the replacement goods.

Purchase Order Revisions

If a revision is required on an existing Purchase Order, the Purchase Order Revision Request Form, must be completed. The Purchase Order Revision Request Form is located on the ERP homepage. Revisions are only allowed for the following situations:

- Increases, decreases, or cancellations to existing Service PO lines within 12 months from issuance.
- Changes to unit cost of goods-type item, the same item will be received/invoiced – no quantity changes or substitution
- Cancellations of goods-type items can only be initiated if goods have not shipped. If goods have shipped, a return request must be submitted.

If the revision does not meet the criteria above, a new requisition needs to be submitted.

Vendor Payments

Invoices are generated by vendors with whom Rush has issued a Purchase Order. Each invoice must reference the PO number it is ordered under. **Invoices without a PO number will not be processed for payment and will be returned to the vendor.** Please note a PO must be issued for all purchases. Exceptions include those listed previously in the Non-PO Expense section of this policy.

Per the PO terms and conditions, invoices must be submitted to Accounts Payable via email to InvoiceAP@rush.edu. Alternatively, vendors may send invoices electronically via other methods such as EDI if vendor is a partner of the GHX system. If an electronic method of submission is not possible, hard copy invoices may be submitted using the Rush Accounts Payable PO Box as stated on the PO.

Timely delivery of invoices facilitates timely payment to the vendor and avoidance of late fees.

Invoice Processing

All invoices are reviewed to ensure a PO number is referenced prior to the invoice being processed into the ERP system. Invoices for goods with a purchase order are 3-way matched in our system to ensure the quantity and price agreed to under the purchase order matches to the



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Printed copies are for reference only. Please refer to the electronic copy for the latest version invoice and the amount received. The ordering department may be involved as necessary in resolving an invoice dispute.

Invoices for services are routed for electronic approval. Accounts Payable enters them into the ERP based on service PO information. The electronic approval process flow follows the approver table listed below:

Dollar Amount	Approval Needed	Leadership Level (suggested)
\$0 - \$2,500	Level 1	Administrator
\$2,500 - \$25,000	Level 2	Manager
\$25,000 - \$100,000	Level 3	Director
\$100,000 +	Level 4	AVP or VP

Invoices routed for service approval are to be approved as quickly as received in order to ensure timely payment. There is a five-day escalation process, whereby if a service invoice approval remains at a Level for five business days, it is automatically escalated to the next Level approver. Service invoices also can be submitted as pre-approved with appropriate signature authority level on an exception basis.

Invoices for goods and services must have a matching PO. All goods/supplies/minor equipment must be received and certain minor equipment might also need to go through inspection process before the invoice is paid.

Process and Payment of Invoices

The Accounts Payable department is responsible for timely and accurate processing of invoices and check requests, in accordance to financial policies, to ensure prompt payment to our vendor base. In order to deliver on our commitment, the Accounts Payable department has several policies and procedures in place that must be followed to ensure timely processing and payment

Vendor Terms

Rush’ standard commercial vendor payment terms are currently 45 days from the date of the invoice. Shorter terms based on prompt pay discounts and payment method rebates are also routinely accepted. Independent Contractors are provided payment terms of 7 days. These standards are subject to change. Variance from the standard terms due to business reasons must be preapproved by Corporate Finance.

Payment Options

There are three types of payment options currently in place. They include paper checks, Single Use Accounts – SUA (virtual credit card), or electronic ACH payment options. The preferred method of payment is SUA, as it provides earlier payment and additional information to the vendors while generating a material rebate to Rush.



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Payment Cycle

A streamlined payment process is critical to the efficiency of the payment issuance process. To that, the Accounts Payable team at Rush issues payments on a weekly basis. This ensures our vendor community is paid in a timely manner. Emergency payments may be issued with the approval from a member of the Corporate Finance Leadership Team.

Vendor Follow Up and Resolution

During the invoice process, there may be delays in making sure all invoices are processed in a timely manner. Due to delays in process, the Accounts Payable team may receive inquiries regarding payment status of certain invoices. As a result, the Accounts Payable Team has created a separate call center to take care of vendor resolution and inquiry.

To contact the vendor resolution call center team, please use the contact information below:

Direct Call – 312-942-5613

Email Inquiry: accountspayable@rush.edu

II. Definitions

Accounting Unit / Department – a numeric cost center for financial tracking of a specific activity including revenue, expenses and operating statistics.

Buyer – the purchasing agent or an individual in the supply chain department that is assigned requisitions/POs for processing.

Contract – a contract applies to all agreements and understandings requiring a signature between Rush and another party to supply goods or services. Associate Vice Presidents and above have signature authority. See Rush Legal site for authorized signatures on contracts.

Courtesy Price – pricing provided to an organization at a discount without a formal agreement.

Expense – recognition of consumed goods or services in a specific period which will be matched against revenue earned in that same period.

Expenditure – is an outflow of cash to pay for a tangible good or services. Not all expenditures are considered expense.

Fund Account – a system for recording resources whose use has been limited by a donor, grant authority, governing agency, or other individuals or organizations or by law.

Goods or Operational Goods – tangible materials or supplies used operationally, considered non-capital (less than \$5,000 in value).



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Group Purchasing Organization (GPO) – an entity that helps healthcare providers-such as hospitals, nursing homes and home health agencies-realize savings and efficiencies by aggregating purchasing volume and using that leverage to negotiate discounts with manufacturers, distributors and other vendors.

Independent Contractor – a person or business that contracts to do work for another person/business independently. The contractor is subject to a mutually binding agreement for a specific job or engagement.

Inventory – items that are stored in the Rush warehouse or Rush Oak Park storeroom and included in the item master. Requisitions for Inventory items will generate a pick ticket to be pulled from storeroom inventory. These are referred to as I-Type items in Link.

Invoice – a document from a vendor requesting payment for goods and/or services that includes invoice date, invoice number, vendor name, vendor remit address, description of goods/services and amount due.

Item Master – a catalog of items preloaded with defined attributes in the ERP system representing commonly ordered items for the institution which streamline the procurement process. The Item Master comprises Inventory & Nonstock materials.

Nonstock – items that must be ordered directly from a vendor. Requisitions for Nonstock items will be assigned a Purchase Order to be issued to vendors. These are referred to as N-Type items in Link.

Open order – a Purchase Order for an ongoing contracted service. The purchase order will remain open for duration of the agreement or until no funds are available. The department may request a PO (Purchase Order) revision to add funds with appropriate supporting documentation.

Purchase Order – a legally binding contract document issued by a buyer to a seller, in this case, from Rush to a vendor. A purchase order indicates an agreement to purchase goods or services, the quantities of those good or services at agreed prices combined with additional terms and conditions governing said purchase. It is used to control the purchasing of products and services from external vendors through use of a contract.

Quote – a solicitation received for a potential purchase. Quotations are only to be requested from an approved vendor in the Rush vendor master file. Quotations are typically used as supporting documentation. They are not intended to obligate the organization monetarily.



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Requester – an end user designated and authorized to place orders for goods and services for a given department.

Requisition – a document which requests the procurement of goods or services, which will be assigned a requisition number once it has been entered into the ERP system and routed for approval prior to the issuance of a purchase order.

Requisition Center (RQC) – refers to the ERP platform of placing a request for a good or service.

Requesting Location – a numerical value representing the location requesting goods or services.

Return Goods Authorization (RGA) – a document or record initiating, typically with a numerical value, the return of a good to the originating manufacturer.

Service – intangibles that are provided to a department by a vendor. This includes but is not limited to: janitorial services, repairs, consulting services, independent contractors. Service orders are referred to as S-Type items in Link.

Specials – operational goods needed but not listed in the Item Master. These are referred to as X-Type items in Link.

Standing Order – a special type of Purchase Order from which releases are issued on a daily, weekly, or monthly basis. These are typically created to enable automated shipments for critical goods such as medical gases. Standing orders are subject to approval by Supply Chain personnel.

Vendor Master – list of approved vendors loaded with defined attributes in the ERP system

III. Procedure

N/A

IV. Attachments

N/A

V. Related Policies or Clinical Resources



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Capitalization Policy :

<https://insiderush.rush.edu/departments/CorpFinance/Documents/CapitalizationPolicy-PropertyManual11-17.pdf>

[Travel and Employee Reimbursement](#)

[Procurement for Direct Capital Goods and Services](#)

VI. References and Regulatory References

Uniform Guidance Procurement “Claw” 200.320

[View Supply Chain FAQs](#)

Exhibit 1

Federal Research Grants Sourcing

Applicable Uniform Guidance Section: 200.318, 200.319 & 200.320

The Uniform Guidance emphasizes that all procurement transactions must be conducted in a manner providing full and open competition. Use of Rush Preferred Vendors satisfies this requirement. All Preferred Vendors are reviewed upon contract expiration to ensure equitable distribution. This policy is in compliance with the new standard effective July 1, 2018 for Federal research grants only. The Uniform Guidance Procurement Checklist is required for all transactions \$10,000 or greater.

A. General Requirements:

All procurement types (including those imbedded in cost transfers to Federal Funds) must comply with the General Procurement Standards in section 200.318, which can be summarized generally as follows:

The purchase complies with the non-Federal entity's documented procedures in place (procurement policy)

1. Purchases are necessary and allowable per the applicable Uniform Guidance
2. Open competition (to the extent required by each method)
3. Conflict of Interest (COI) policy in place that references procurement related considerations¹
4. Proper documentation for the purchases



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- Needs to sufficiently detail the history of procurement to include:
 - Rationale for the method of procurement chosen;
 - Selection of the contract type;
 - Selection or rejection of contractors; and
 - Basis for the contract price

1.6 Procurement must not limit competition based on state or local geographical preferences.

B. Methods for Procurement

1. Micro purchases
 - Purchases that do not exceed \$10,000.00
 - Competition not required
 - No quotes required

2. Small purchases (Complete Method used-Section 1)
 - Purchases between \$10,000.00 and \$149,999.99
 - Price and rate quotes must be obtained from an adequate number of qualified sources (at least 2)

3. Purchases greater than the Simplified Acquisition Threshold (\$150,000.00)
 - Cost and price analysis must be performed for every procurement including contract modification
 - Requires a Request For Proposals from an adequate number (at least 2) of qualified sources with document specifications, evaluation criteria and independent cost estimate
 - Profit must be negotiated as a separate element of the price when there is no price competition
 - Justification of profitability is required from the Vendor
 - Refer to the Capital Projects Procurement Procedures for Capital Improvement and Construction related projects.

4. Sole Source

Procurement by noncompetitive proposals (sole source) is procurement through solicitations from only one source and may be used only when one or more of the following circumstances apply:

- The item is only available only from a single source;
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;



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- The Federal Awarding Agency Authorization, the awarding agency specifically authorizes a non-competitive procurement after a written request from the Non-federal entity)
- Inadequate competition after multiple attempted solicitations
- Cost or price analysis is still required to establish a reasonable price

C. Cost Transfers

Effective July 1, 2018, any cost transfers will require a copy of the Purchase Order. If the Purchase Order is over \$10,000, a copy of the checklist is also required. The Purchase Orders associated with cost transfers to Federal Grants fall under the new procurement policy for Federal Research Grants. All purchases < \$10,000 require equitable distribution among qualified vendors, to the extent possible.

Federal to Federal transfers for Purchase Order amount under \$10,000:

- Cost transfers related to Purchase Orders under \$10,000 just requires a copy of the Purchase Order.

Federal to Federal transfers for Purchase Order amount over \$10,000:

- Cost transfers related to Purchase Orders dated prior to July 1, 2018 requires a copy of the Purchase Order.
- Cost transfers related to Purchase Orders dated after July 1, 2018 requires a copy of the original checklist and a copy of the Purchase Order

Non-Federal to Federal transfers for Purchase Order amount under \$10,000:

- Cost transfers related to Purchase Orders under \$10,000 just requires a copy of the Purchase Order. Refer to General Procurement Guidelines for Federal Research Grants for Purchase Orders dates after July 1.

Non-Federal to Federal transfers for Purchase Orders over \$10,000:

- Cost transfers related to Purchase Orders dated prior to July 1, 2018 just requires a copy of the Purchase Order.
- Cost transfers related to Purchase Orders dated after July 1, 2018 require a copy of the original checklist and a copy of the Purchase Order. Purchase Orders over \$10,000 without the checklist are not eligible for cost-transfer. For example, if you are submitting a Purchase Order to a Research Accounting unit and anticipate transferring any of the costs to a federal fund, submit the New Procurement checklist at the time when ordering.

¹ Per Uniform Guidance, Section 200.318: "No employee, officer, or agent must participate in the selection, award, or administration of a contract supported by a



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