About Uniform Guidance

Uniform Guidance Overview

Uniform Guidance is a set of regulations (located at 2 CFR 200) that consolidates federal guidelines impacting research administration. Per the OMB website, this guidance “supersedes and streamlines requirements from OMB Circulars A-21, A-87, A-110, and A-122 (which have been placed in 2 C.F.R. Parts 220, 225, 215, and 230); Circulars A-89, A-102, and A-133; and the guidance in Circular A-50 on Single Audit Act follow-up.”

Goals of Uniform Guidance

Uniformed Guidance significantly reforms federal grant making to focus resources on improving performance and outcomes. The intent is to reduce administrative burdens for grant applicants and recipients and reduce the risk of waste, fraud, and abuse.

Procurement guidance is specifically located in sections 200.317-200.326. This guidance focuses on increased competition (full and open) and transparency in the procurement process.

Mercer University Externally Funded Grant and Contract Procurement Procedures

Procedures

Mercer University will implement policies and procedures to align with Uniformed Guidance on 7/1/2018 and has created steps based on purchase amount to assist Departments with Uniformed Guidance compliance and University requirements. These policies and procedures apply to externally funded grant and contract procurement. All purchases should be necessary, reasonable, allocable, prudent, and subject to fair and reasonable pricing. Policies and Procedures regarding procurement for Mercer Engineering Research Center are in compliance with Federal Acquisition Regulations.

- Micro-purchases – Threshold $3,000. Procurement by micro-purchase is the acquisition of goods or services with the aggregate dollar amount which does not exceed $3,000. No bid or quote process required. No cost analysis required. Purchases equitably distributed among qualified suppliers. Purchasing card one-time transaction limits will be set at $3,000. Requests for Payment one-time limits will be set at $3,000.

- Small Purchases Non-Construction – Threshold $3,001 - $149,999. Pricing or rate quotes required from an adequate number of sources. Acceptable method of pricing includes price/market catalog, quote, and historical pricing. Purchasing can provide assistance with catalog pricing. Prior to requisition approval, the pricing or quotes should be
documented on the Mercer University Procurement Justification form and submitted to Purchasing. Once approved, please attach the Mercer University Procurement Justification form to the online requisition. Requisition and purchase orders will be required for goods and services procured for $3,001-$149,999 on a grant or contract.

- Purchasing Sealed Bids Construction – Threshold $150,000 or greater. Sealed bids must be publicly solicited. Two or more bidders are willing and able to compete and qualified to do the work. Realistic specification or purchase description is available. All construction quotes are solicited, managed, approved by Physical Plant. This only applies to federally funded grants or contracts for construction.

- Competitive Bid Proposals Non-Construction – Threshold $150,000 or greater. Requires requests for proposals and solicitation of an adequate number of bids. Please use the Competitive Bid Proposal form. Documented evaluation (example -price) of the bids and the data used to select the vendor. All departments should contact Purchasing for assistance in obtaining and evaluating these bids. Requisition and purchase orders will be required for goods and services procured for $150,000 and above on a non-construction grant or contract. Depending on the non-federal sponsor requirements, this may or may not apply.

- Sole Source - In order to waive the competitive bid process by demonstrating that only one supplier provides the goods you seek, please complete the Request for Sole Source Justification form and submit to Purchasing. If this request is for a federal grant, the Grants and Contract Office will also need to approve the justification. Each Sole Source Justification form is valid for the fiscal year. Once approved, please attach the Request for Sole Source Justification form to the online requisition. Requisition and purchase orders will be required for goods and services procured for $3,001 and above on a non-construction grant or contract.

**Ethical and Confidentiality**

University employees should avoid the intent or appearance of unethical practice in relationships, actions, and communications. Employees should handle confidential information with due care. Those part of the bid process should be in compliance with University conflict of interest policies.

[https://accounting.mercer.edu/policies-and-procedures/](https://accounting.mercer.edu/policies-and-procedures/)

[http://about.mercer.edu/trustees/](http://about.mercer.edu/trustees/)
University employees should refrain from purchasing goods/services or committing the University to the purchase of goods or services without following the Purchasing Procurement steps and working with Purchasing.

Mercer University complies with federal regulations which prohibit transacting or making payments to a supplier that are debarred by the U.S. Federal Contractor Registration.