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## PROCEDURE

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**Series:** Procurement **COA:** FIN 7.04, ETH 3  
**CFOP:** N/A

**Policy Name:** Small Procurement & Micro-Purchases  
**Policy Number:** PR-904  
**Reviewed Date:** 1/14/13, 6/17/16, 3/1/17, 3/22/19  
**Revision #/Date:** (7) 9/12/11 (Originally part of PR-901), (8) 6/27/21

**Effective Date:** 12/15/2008

**Applicable to:** All BFP Family of Agencies Staff, Contractors, Providers and Vendors

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**SUBJECT:** Procurement of Commodities or Contractual Services with a value of \$250,000.00 or less.

**PURPOSE:** This operating procedure provides guidance for an efficient and effective commodity and/or service procurement program. Products and/or services must be purchased as economically and expeditiously as possible, consistent with good purchasing practices. As stewards of public funds, employees who are authorized to procure services must develop clear, concise conditions and specifications; keep competition fair and open; and remain free from obligations to vendors.

### **PROCEDURE:**

#### **Scope**

Brevard Family Partnership (BFP) procures commodities and/or services that are responsive to the needs of the children and families in care. Procurement of these items is in accordance with state and federal laws, and Department of Children and Families contract requirements and BFP policies and procedures as applicable.

BFP plans and coordinates purchases to ensure that quality products and/or services are obtained in a timely manner from responsible agencies on a competitive basis. BFP recognizes that fair and open competition is a basic tenet of public procurement, and that competition reduces the appearance and opportunity for favoritism and inspires public confidence.

All procurements must be allowable and necessary for BFP operations. BFP avoids purchasing unnecessary or duplicative commodities or services.

#### **Reference**

BFP Policies/Procedures: AP-432, GOV-201, GOV-202, GOV-203, PR-901, PR-902, PR-903, PR-905 and RQ-505  
2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards



FAC 2005-44 (Federal Acquisition Regulation-Subpart 13, Simplified Acquisition Procedures)  
Department of Children & Families Contract with BFP  
Florida Statutes: 403.7065, 946

**Definitions**

**Administrative Services:** Goods and/or services that are incurred for common or joint objectives and cannot be readily identified with a particular objective for a child or family being served by BFP.

**Adoptive Parent:** Any person who has been licensed/approved by the State of Florida, Department of Children and Families, to be eligible to assume permanent guardianship of children removed and terminated from their parents' custody.

**Applicant/Bidder:** A vendor, provider, or contractor which provides information to BFP to be selected to fulfill a procurement.

**BFP Provider Network:** Vendors, providers and/or contractors residing in Brevard County that are approved to supply child and family services to clients of BFP.

**Child and Family Services:** Goods or services that are incurred for a specific purpose or to meet a specific objective identified for a child or family being served by BFP.

**Commodity/Good/Product:** A tangible article of trade or commerce; a product as distinguished from a service.

**Contract:** A written agreement between BFP and a vendor/provider/contractor for the doing or not doing of something specified which is enforceable by law.

**Cost Analysis:** The process of examining each element of the estimated or actual cost of a contract performance to determine the probable cost to the vendor.

**Foster Parent:** Any person who has been licensed/approved by the State of Florida, Department of Children and Families, to be eligible to serve as a guardian of children removed from their parents' custody.

**Large Purchase:** Any procurement greater than \$250,000.00.

**Micro-Purchase:** The purchase of goods or services which does not exceed \$10,000.00.

**Price Analysis:** The process of deciding if the asking price for a good or service is fair and reasonable, without using the specific cost and profit calculations of the provider used in arriving at the price.

**Relative/Non-relative Caregiver:** Any person who has been approved by the State of Florida, Department of Children and Families, to be eligible to serve as a guardian of children removed from their parents' custody.

**Service:** The performance of any duties or work for another; helpful or professional activity.

Small Purchase: Any procurement of value within the Small Purchase Threshold.

Small Purchase Threshold: Any procurement with a value between \$10,000.01 and \$250,000.

Subrecipient (Provider/Sub-contractor): A non-federal entity that expends Federal and State awards received from a pass-through entity to carry out a Federal or State program but does not include an individual that is a beneficiary of such a program.

Vendor: A dealer, distributor, merchant, or other contractor providing goods or services that is required for the conduct of a Federal or State program. These goods or services may be for an organization's own use or for the use of beneficiaries of the Federal or State program.

### **General Consideration for Small Procurements**

All provisions of procedure number PR-901: Procurements of Commodities or Services – General, are applicable to procurements with a value between \$10,000.01 and \$250,000.

### **Small Procurement Procedures**

All procurement of commodities or services which have a value between \$10,000.01 and \$250,000 shall be considered a small purchase by BFP. As a small purchase, competitive proposals do not have to be acquired but as required by 2 CFR Part 200, all procurement transactions shall be conducted in a manner to provide, to the maximum extent practical, open, and free competition. At our discretion, BFP may choose to competitively procure items that fall under "Small Procurement" thresholds and if so, will utilize the "Large Procurement" procedures.

To ensure open and free competition, the following process will be followed:

- A cost or price analysis will be conducted and documented for small purchases made by BFP for administrative goods or services as defined above except as otherwise noted below. Reference procedure number PR-901: Procurements of Commodities or Services – General, for details on performing a cost or price analysis.

Exceptions to the requirement of a cost or price analysis for administrative goods or services are as follows:

1. When items are provided by or mandated by a government agency, local municipality (i.e., utility, garbage, or water service, etc.) Under these circumstances, the following provisions will be followed:
  - No price or cost analysis will be performed.
  - No conflict-of-interest form will need to be completed.
  - No procurement file will be created.



- For child and family goods or services, as defined above, all subrecipients and vendors will participate and be approved through the RFQ process defined in procedure PR-903: Large Procurements, except as otherwise noted.

Exceptions to the defined RFQ process outlined in procedure PR-903 for child and family goods or services to be supplied are as follows:

1. When services are provided by a government agency, licensed day care, or local municipality (i.e., utility, garbage, or water service, etc.). Under these circumstances, the following provisions will be followed:
  - No price or cost analysis will be performed.
  - No conflict-of-interest form will need to be completed.
  - No procurement file will be created.
2. Further, BFP recognizes that there are instances where staff, foster and adoptive parents, as well as relative/non-relative caregivers may need to make purchases for BFP clients where “documenting” a cost or price analysis is not efficient, timely in consideration of service needs or cost effective. Under these circumstances, purchasing child and family goods/services must meet one of the following conditions:
  - When goods and/or services can only be acquired from a limited number of licensed service vendors (i.e., prescription drugs, eyewear, dental, etc.).
  - Goods and/or services purchased from a grocery store, clothing outlet, or other ‘low-cost’ vendor or transportation needs, etc. (i.e., Walmart, Target, Sears, JC Penny, airlines, bus lines, etc.).
  - When goods/ services are supplied by a subrecipient, or vendor located out of the BFP Provider Network to meet the order from a court of law.

Under these circumstances, the following provisions will be followed:

- No price or cost analysis will be performed.
- No conflict-of-interest form will need to be completed.
- No procurement file will be created.
- It is the obligation of the BFP staff member, each foster or adoptive parent, and relative/non-relative care givers associated with the BFP network to make a good faith effort to acquire the items at the lowest price possible with no favoritism to any vendor.

- It is the obligation of each BFP staff member, foster or adoptive parent, and relative/non-relative care givers associated with the BFP network to make a good faith effort to determine if the potential subrecipient or vendor meets applicable licensing/insurance requirements as required in procedure RQ-505: Risk Assessment Process.

It should be noted that the lowest bid/quote will not necessarily be the one selected, but cost and service effectiveness are to be the main considerations in the selection process.

Small purchases will be approved as set forth in procedure AP-432: Purchase Authorization or in policy GOV-201: Signatory Authority.

The cost or price analysis for “routine administrative supplies”, to include such items as paper, binders, pens, cleaning agents, etc., may be performed to identify a specific vendor for a given period not to exceed a twenty-four (24) month period.

The cost or price analysis for “routine administrative maintenance goods/services”, to include plumbers, electricians, janitors, etc., may be performed to identify a specific vendor for a given period not to exceed a twenty-four (24) month period.

A cost or price analysis for banking and audit services may be performed to identify a specific vendor for a given period not to exceed a sixty (60) month period.

A cost or price analysis for all other goods or services not separately outlined will be performed for any given vendor/subrecipient (provider)/contractor for a specific period not to exceed a sixty (60) month period unless otherwise stated.

Further, when administrative goods are purchased from a selected vendor or subrecipient, any corresponding maintenance services for this product shall not need to be procured unless the administrative good itself is being re-procured. This should not preclude the BFP staff from making a good faith effort to acquire the service at the lowest price possible with no favoritism to any vendor or subrecipient.

### **Micro-Purchase Procedures**

All procurement of commodities or services which does not exceed \$10,000.00 shall be considered a micro-purchase by BFP. As a micro-purchase, competitive proposals do not have to be acquired but as required by 2 CFR Part 200, shall ensure that the price is reasonable. BFP recognizes that there are instances where staff may need to make micro-purchases where “documenting” a cost or price analysis is not efficient or cost effective. For example, specific meeting needs purchased from a grocery store or another ‘low-cost’ vendor, travel needs, etc. Under these circumstances, purchasing goods/services must meet the following conditions:

- It is the obligation of the BFP staff member to make a good faith effort to acquire the items at the lowest price possible with no favoritism to any vendor.
- The total purchase price of the transaction shall not exceed \$10,000.00 for goods/services being acquired.

- No conflict-of-interest form will need to be completed.
- No procurement file will be created.
- It is the obligation of each BFP staff member to make a good faith effort to determine the risk exposure to the company as required in procedure RQ-505: Risk Assessment Process.

#### Purchase Orders:

Purchase orders (PO) are used by BFP to facilitate the payment of small purchases typically for administrative commodities or services. Child and family goods and services may be authorized with a PO if conditions warrant but it should not be considered the norm. The PO will allow the approving manager, as set forth in procedure AP-432: Purchase Authorization, to determine if a proposed purchase is reasonable, necessary and in the budget.

The Purchase Order System (POS) is maintained on the BFP shared drive at the following address: G:/shared documents/BFP Forms/Purchase Order.xls. A separate POS will be maintained for the IT Department in the TrackIT system. The POS will be monitored and maintained by the Finance Director designee.

Any BFP employee (a requestor) may originate a purchase order. The requestor completes the purchase order located in the POS. (Please reference the instructions for using the POS.) All purchases are based on valid, budgeted, approved requests that are properly executed as to price, quantity, quality, and selected vendor via cost/price analysis.

#### Utilization Management (UM) System:

Payments for small purchases relating to child and family services authorized by Care Coordinators are tracked through the Utilization Management system. All providers authorized to perform these services are pre-approved through the RFQ or prior ERFQ processes.

#### Flex Funds:

Payments for small purchases relating to child and family services authorized by appropriate staff, and/or Care Coordinators are processed as outlined in procedure OP-1016: Flex Funds. All providers authorized to perform these services are pre-approved through the Small Procurement Procedures outlined above.

BY DIRECTION OF THE CHIEF EXECUTIVE OFFICER:



PHILIP J. SCARPELLI  
Chief Executive Officer  
Brevard Family Partnership / Family of Agencies

APPROVAL DATE: 6/30/21