



LOCAL GOVERNMENT PURCHASING OFFICERS BEST PRACTICES

Disaster Procurement Compliance

Listed below are suggested best practices offered by North Carolina local government purchasing officers to help ensure compliance with Uniform Guidance (2 CFR Part 200) procurement requirements in disaster contracting.

DISASTER PROCUREMENT COMPLIANCE

- Educate your department heads on Uniform Guidance procurement requirements (ex: \$10,000 federal micropurchase threshold compared to state \$30,000 informal bidding threshold).
- Create a “UG Checklist” for all department heads and other personnel who have contracting authority to use to for each procurement.
- Have your attorney develop boilerplate template for required contract provisions (2 CFR Part 200, Appendix II).
- Check cost reasonableness of purchases by using the SOG purchasing officer’s listserv to compare pricing.
- Save all cost reasonableness online price comparison research to your procurement file – you never know when you will get audited.
- Where you can, preposition contracts following all UG requirements.
- Bookmark the FEMA PDAT website: <https://www.fema.gov/procurement-disaster-assistance-team>
- Create a separate file for disaster procurements to save procurement process documentation (ex: solicitation, MWBE/HUB outreach, bids, bid tabs, contract, etc.).
- Post bids on state HUB Office website for MWBE/HUB outreach efforts: <https://ncadmin.nc.gov/businesses/historically-underutilized-businesses-hub/submit-bid-opportunity-hub>
- Post bids on State IPS website for broader solicitation: <https://files.nc.gov/ncdoa/pandc/Documents/IPS/PostingBidsPresentation.pdf>
- For electronic purchase transactions, purchase orders, and invoices, post Uniform Guidance contract provisions on your website and program an automated sentence in your electronic purchase order system or finance software such as (better have your attorney review these!):



- “This order includes federal funding. In addition to the printed Purchase Order Terms and Conditions, federal contract provisions required under the Uniform Guidance (2 C.F.R. § 200.326 and Appendix II) apply to this Purchase Order to the extent required by law and are incorporated herein by reference and are available at [link to website where provisions are posted].”
- “In addition to printed PO Terms & Conditions, FEMA contract provisions found in FEMA Contract Provisions Template at [\[FEMA PDAT contract provisions template link\]](#) apply to PO to the extent required by federal law, as does ability to terminate due to cause/convenience.”
- If contracts already entered into don’t have required FEMA Uniform Guidance contract provisions, then fax, email, or mail them to those existing vendors and contractors notifying them that in order to proceed with the contract, they must consent to these provisions.
- Post FEMA Uniform Guidance contract provisions on your website with a notice to vendors that these provisions apply to all contracts paid for in part or whole with federal funds.