



OMB GUIDANCE: 2 CFR 200: UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS.

- PROCUREMENT POLICY
- COMPETITION
- CONFLICT OF INTEREST
- TRANSPARENCY
- ACCOUNTABILITY

PROCUREMENT POLICY: COMPETITION

Current WMI/NALCC Process

- Request for Proposals Issued with Specific Deliverables Requested
- Independent Review of Proposals
- Standardized Scoring

PROCUREMENT POLICY: COMPETITION

WMI shall disallow any contractor from competing for procurements in which the contractor has helped develop or draft specifications, requirements, statements of work, and invitations for bids or requests for proposals.

PROCUREMENT POLICY: COMPETITION

When soliciting for procurement, WMI shall ensure that all solicitations:

- Include a clear and accurate description of the technical requirements for the service to be procured
- Identify all requirements for which the prospective grantees or vendors must fulfill and all other factors to be used in evaluating bids or proposals.

PROCUREMENT POLICY: COMPETITION AND SOLE SOURCE JUSTIFICATION

Procurement by non-competitive proposals shall only occur when:

- The item is available only from a single source
- Public exigency or emergency will not permit a delay resulting from competitive solicitation
- The Federal awarding agency expressly authorizes non-competitive proposals in response to a written request
- After solicitation of a number of sources, competition is determined to be inadequate.

USFWS POLICY 516 FW 6, ISSUING DISCRETIONARY GRANT AND COOPERATIVE AGREEMENT AWARDS WITHOUT COMPETITION

1. Unsolicited Proposal: a unique or innovative idea, method, or approach that is not the subject of a current or planned award, but is found to be advantageous to program objectives.
2. Continuation of Previous Grant
3. Legislative Intent
4. Unique Qualifications: The applicant is uniquely qualified to perform the activity based on a variety of demonstrable factors such as location; property ownership; voluntary support capacity; cost-sharing ability, if applicable; technical expertise; or other such unique qualifications.

CONFLICT OF INTEREST

WMI shall maintain written standards of conduct covering conflicts of interest:

- No employee, officer or agent shall participate in the selection, award or administration of a contract if he or she has a real or apparent conflict of interest.
- No employee, officer or agent shall solicit or accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts.
- Any employee, officer or agent found to willingly violate the conflict of interest policy may be subject to dismissal.

TRANSPARENCY

WMI shall award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of the contract. Contractor selection shall be based upon assessment of:

- Contractor integrity
- Compliance with public policy
- Record of past performance
- Financial and technical resources
- Grantor recommendations based on independent review and assessment.

ACCOUNTABILITY

WMI shall maintain records sufficient to detail the history of procurement, including:

- Rationale for the method of procurement
- Selection of contract type
- Contractor selection or rejection
- Basis for the contract price

Minutes of Financial Transactions