

## **Procurement Policy**

## **Revision History**

Date	Revision	Description	Author
August 2018	1.0	First Draft	Sr Accountant, VP
			Finance

## 1 Purpose

The purpose of this document is to establish standards and guidelines for purchase of services, equipment, supplies etc. to ensure that they are obtained as economically as possible through an open and competitive process, and that contracts are managed with good administrative practices and sound business judgment. These guidelines will ensure CDISC is compliant with updated procurement standards.

## 2 Roles

CDISC Staff	Assigned by department head for procurement
Department Head or VP	Supplier approval
Finance / CEO as appropriate	
Accounting	Federal debarment check;
_	Collect W9 & Vendor forms from approved suppliers;
	Retain and maintain documentation for each vendor

# 3 Methods and Requirements

#### 1. General Procurement standards

All procurement transactions will be conducted to provide – to the maximum extent possible – free and open competition among suppliers, to obtain the best possible quality at the best possible price.

The extent and formalization of these efforts depend on the value of the purchase or contract.

All necessary affirmative steps will be taken and documented to solicit participation of CDISC member entities followed by locally owned, minority-owned, female-owned and small businesses.

Procurement requests should not be divided and "stacked" in order to artificially reduce the procurement amount. For clarity purposes, all dollar value ranges below are meant over a 12-month period.

All procurement in excess of US\$10,000 over a 12 month period must be supported by a written contract.

## 2. Micro Purchases (aggregate dollar range US\$1-US\$,2500)

Simple and informal procurement methods can be used for such small purchases.

Efforts must be made to get the best and lowest price, but no formal competitive quotes are required if management determines that the price is reasonable.

To the extent practicable, CDISC will aim to distribute purchases equitably among qualified suppliers.

## 3. Medium Purchases – (aggregate dollar range US\$2,500-US\$25,000)

Simple procurement methods can be used for medium purchases. However the selection process must be formalized using the CDISC Procurement form — see attachment 1.

Price or rate quotations must be obtained from an adequate number of qualified sources.

A cost or price analysis is required, as well as a written evaluation of the proposals received.

Selection of recipients must be justified.

#### 4. Large Proposals: Purchases above US\$25,000

A Request for Proposals (RFP) must be issued and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified sources.

A procurement form (see Attachment 1) must be used to formalize evaluations of the proposals received and for selecting recipients.

Contracts must be awarded to the firm whose proposal is most advantageous to the program with price and other factors considered.

## 5. Competitive Proposals: Purchases above US\$250,000

Requirements are the same as for large proposals. In addition, the RFP must be publicized through one or more of the following:

- A 30-day notice on the CDISC website
- A 30-day notice on two industry-appropriate websites or bid aggregators where proposals for similar goods or services are advertised.
- Providing the RFP to no less than four unrelated firms which management recognizes can perform the service/provide the good

## 6. Noncompetitive Proposals:

This method may be used only when one or more of the following circumstances apply:

- 1) The item/service is available only from a single source.
- 2) Emergency for the requirement will not permit a delay resulting from competitive solicitation.
- 3) The federal awarding agency or pass-through entity expressly authorizes noncompetitive proposals in response to a written request form.
- 4) After solicitation of a number of sources, competition is determined inadequate.

The justification for using the noncompetitive proposal method should be formally documented.

When using the noncompetitive method, every effort should be made to ensure the best and lowest price is achieved.

#### 4 Procurement Process

- 1) Check the list of existing approved vendors for the goods/services that are being sought to avoid duplicate purchases.
- 2) If none of the existing vendors can provide the goods/services, determine the procurement method to be used based on the cost thresholds listed above.
- 3) Appropriate selection steps must be documented on the procurement control form.
- 4) Department head or CDISC leadership must approve final selection as per CDISC delegation of authority matrix, by signing the procurement control form.
- 5) Once a supplier is selected, send supplier name, tax id to accounting to check against Federal debarred companies list.
- 6) Once contract is signed, accounting will collect tax and vendor enrollment forms (see attachment 2).
- 7) For recurring or long-term (3 or more years) contracts, an evaluation checklist must be included in the procurement control form and performance evaluation made regularly.

#### 5 Procurement files maintenance

## 1. Supplier Selection Documentation:

All source documents supporting a given transaction (from selection process to contract and invoice) will be retained and filed in an appropriate manner by the accounting department. This is to ensure that a clear and consistent audit trail is established.

Before payment is made, the department head must confirm that services performed are adequate and consistent with the contract

## 2. Approved Vendor List:

For recurring purchases, a list of approved vendors will be maintained by Accounting. Regular evaluation of the contractor or supplier performance will be coordinated by accounting, to provide assurance that the goods or services purchased are being delivered within the scope of the contract and with the expected level of quality and timeliness

#### 6 Code of Conduct

All CDISC representatives (employee, officer, Board member) must abide by the CDISC Code of Ethics and Conflict of Interest policy (CDISC Policy 001) when participating in the selection of suppliers. In particular, no CDISC representative may participate in the supplier selection or administration of a contract, if he or she has a real or apparent conflict of interest.

CDISC employees and representatives must follow the CDISC ethics policy with regards to accepting gratuities, favors or any gift of monetary value from suppliers or potential suppliers.

Any CDISC employee or representative who knowingly and deliberately violates the provisions of above code may be open to civil suit by CDISC without the legal protection of CDISC. Furthermore, they may be subject to disciplinary action, up to and including dismissal, or such sanctions as available under the law. Any contractor or potential contractor who knowingly and deliberately violates the provisions of these procurement standards will be barred from future transactions with CDISC.

## 7 Authorization

This document has been approved and is in effect on this date:

Name	CDISC Board of Directors
Date	10/08/2018

Clinical Data Interchange Standards Consortium, Inc. 401 W. 15th St #800, Austin TX 78701 512.363.5826

Signature:



## Attachment 1

## PROCUREMENT CONTROL FORM

Requested Date:			
Name:			
Department:			
Estimated Budget:			
Service / Goods Needed:			
Select if service / goods not already supplied by an approved vendor:	Yes	No	
Vendor Selection Process (Provide 3 Vendor	dors):		
Vendor Name:			Response Date:
Location:			Price:
Comments:			
Vendor Name:			Response Date:
Location:			Price:
Comments:			
Vendor Name:			Response Date:
Location:			Price:
Comments:			
Selected Vendor: Recommendation and Justification			
Head / VP Approval:			

Date:

Clinical Data Interchange Standards Consortium, Inc. 401 W. 15th St #800, Austin TX 78701 512.363.5826

Signature:



## Attachment 1

# PROCUREMENT CONTROL FORM (CONTINUES)

ACCOUNTING CHECK	
List Task and Date Completed:	
Vendor not on the federal debarment list	Date Completed:
Vendor contract signed (if applicable)	Date Completed:
Vendor enrollment form completed	Date Completed:
Vendor W-9 Form	Date Completed:
Additional Comment:	

Date:



# **VENDOR ENROLLMENT FORM**

Reason for Submission:				
New Vendor	Existing Vendor Update			
VENDOR PROFILE				
Vendor Type:	Organization	Individual		
Company Name:				
First Name:			Last Name:	
Address:				
City, State, Zip Code, Country:				
Phone Number:		E-mail:		
Tax ID/EIN:				
PAYMENT INFORMATION				
Preferred Payment Method:	Check	EFT Wire		
ACH Payment Information				
Bank Name:				
Account Number:				
Routing Number:				
Wire Transfer				
Beneficiary Name:				
Beneficiary Address:				
Bank Name:				
Bank Address:				
Account Number:				
ABA Number:				
BIC/SWIFT Code (For International):				
IBAN (For International):				
Remittance Address (If Different From	n Above):			
SIGNATURE:			DATE:	

APPROVED BY: