
**WEST VIRGINIA
CLINICAL & TRANSLATIONAL SCIENCE INSTITUTE**

**Procurement and Purchasing
with WVCTSI Funds**

Overview

Purchasing of goods and services is essential in the daily operations of the West Virginia Clinical and Translational Science Institute. All WVCTSI members engaged in externally sponsored projects shall comply with the legal, regulatory, contractual, and ethical requirements established by their organization (WVU, WVURC, WVUH, CHERI, or WVSOM), regulatory agencies, federal and state authorities, and the National Institutes of Health (NIH).

Purpose

The purpose of this standard operating procedure (SOP) is to provide an understanding of the correct procurement procedure to use when purchasing goods and/or services with WVCTSI funds.

Clarification

Procurement involves the process of selecting vendors, establishing payment terms, strategic vetting, and selection, the negotiation of contracts and actual purchasing of goods. Procurement is concerned with acquiring (procuring) all of the goods, services and work that is allowable with WVCTSI funds. Purchasing is the actual process or action to secure goods, services, and work through procurement.

Scope

This SOP applies to all personnel authorized to make purchases within their respective organizations with WVCTSI funds. This includes all authorized personnel at West Virginia University (WVU), West Virginia University Medicine, WVU Research Corporation, West Virginia School of Osteopathic Medicine, and the CAMC Health and Research Institute.

Policy

WVCTSI personnel (WVU, WVURC, WVSOM, and CHERI) authorized to make purchases must ensure all Purchases funded by federal grant funds must adhere to regulations found in OMB Uniform Guidance (2 CFR 200) as well as applicable institutional policies. The department and/or organization making purchases with WVCTSI funds is required to retain back-up documentation, such as bids, quotes, and cost/price analyses on file for Federal auditors.

Procedures

Prior to any procurement actions or subsequent purchases, the authorized personnel must review the WVCTSI Purchasing and Procurement Checklist, sign the checklist, and send it to the director of research administration. If there are any questions regarding items on the Checklist, please contact the director of research administration.

The authorized personnel shall follow her/his organization's policy for making purchases in addition to the policies related to all WVCTSI funds. For WVU/WVURC personnel, please follow the institutional policies located on these webpages:

- WVU Procurement - <http://procurement.wvu.edu/>
 - WVU Policies and Procedures Related to Procurement - <http://procurement.wvu.edu/manuals-procedures>
- Mountaineer Marketplace - <http://procurement.wvu.edu/procurement/mountaineer-market-place>

Regarding all purchases made via Mountaineer Marketplace (MM), the person initiating the purchase request will enter the required information into the MM system to process the request. After this step has been completed, the Director of Research Administration should be notified via email that a requisition or other procurement-related action has been initiated. At that time, the Director of Research Administration will review the action and/or request in MM and approve the action/request as the WVCTSI EBO or request that the cart be assigned to the Director or Research Administration for processing via MM. Even though the MM system may allow others to be assigned as the EBO, only the director of research administration (or a WVCTSI designee) should approve any MM actions involving a WVCTSI POETA account number.

Although the WVCTSI Director may not have the hierarchical authority to approve or deny purchases or procurement made by others, the PI does have the authority to approve or deny funding of these changes from WVCTSI funds if they are found to be

unallowable. If an expenditure is found to be unallowable, then the department/organization will be responsible for these expenditures from unrestricted, departmental/organizational funds.

Responsibilities

Involved with Purchases and Procurement for Services from WVCTSI Funds

- **Core Chairperson:** responsible for the initial review and consideration of the procurement request as well as any subsequent purchases
- **WVCTSI Program Assistant Senior:** if needed, central personnel that will provide purchasing assistance for all allowable Administrative Core purchases; WVCTSI central office personnel (Morgantown); WVCTSI Scholars; and WVCTSI Recruits
- **WVCTSI Administrative Assistant:** in collaboration with the HSC Vice President's Office Business Research Analyst, reconciles all P-Card transactions; also ensures receipts for WVCTSI purchases are provided to the HSC Business Research Analyst
- **Grant Administrator(s):** works with the PI and other business office personnel to initiate the required documentation to initiate the procurement process and any subsequent purchases using WVCTSI funds
- **Expert Business Officer (EBO):** prepares the fiscal information needed to accompany the procurement request and/or any allowable purchases, if approved by the Core Chair
- **Director of Research Administration:** provides administrative oversight to ensure compliance with sponsor guidelines as well as institutional policies
- **WVCTSI Finance Unit:** works with the departmental EBOs to finalize any approved request by submitting required documents to central administrative units; including any procurement service agreements

References and Authority

The cost principles are set forth in the following documents and are incorporated by reference in 45 CFR parts 74.27 and 92.22. As noted below, OMB Circulars A-21, A-87 and A-122 have relocated to Title 2 in the Code of Federal Regulations (2 CFR) :

- OMB Circular A-21 (relocated to 2 CFR 220) — Cost Principles for Educational Institutions.
- OMB Circular A-87 (relocated to 2 CFR 225) — Cost Principles for State and Local Governments and Indian Tribal Governments.

- OMB Circular A-122 (relocated to 2 CFR 230) — Cost Principles for Non-Profit Institutions. Larger non-profit organizations that are specifically listed in Attachment C to OMB Circular A-122 are subject to the Federal cost principles applicable to commercial organizations (48 CFR 31.2) rather than to the cost principles for non-profit organizations.
- 45 CFR 74, Appendix E — Principles for Determining Costs Applicable to Research and Development under Grants and Contracts with Hospitals.
- 48 CFR 31.2 (Federal Acquisition Regulation) — Contracts with Commercial Organizations.
- WVU Administration and Finance Policies including Payroll & Tax, Financial Services, and Business Services located at: <http://adminfin.wvu.edu/policies>
- <http://financediv.wvu.edu/home/pcps/procurement-manualrules>
- WVU: WV State Code §18B-5-9; WVU Purchasing Manual
- WV Ethics Act (code of conduct for all public servants)

Approval and Authority to Proceed

I approve the project as described above, and authorize to proceed.

Name	Title	Date
Sally L. Hodder, MD	Director, West Virginia Clinical and Translational Science Institute	4/18/16 3/2017 Revised

Approved By Date