



OREGON DEPARTMENT OF EMERGENCY MANAGEMENT

Oregon Procurement and Grant Compliance Guidelines (for SHSP, NSGP, EMPG & Other OEM-Administered Grants)

Purpose: This document provides a simplified overview of required procurement practices for all Oregon subrecipients of OEM-administered federal grant funds. All procurements must follow:

1. Local procurement rules
2. State of Oregon procurement law (ORS 279 [A/B/C](#))
3. Federal procurement rules ([2 CFR 200.317–200.327](#))

If two or more rules conflict, the strictest one applies.

1. Procurement Thresholds

(Insert your confirmed small purchase thresholds here)

Small Purchase: up to \$25,000 (\$ _____)

- No quotes required must be distributed equitably among qualified vendors.
- Price must be reasonable.

Intermediate Purchase: \$25,000 and \$250,000 (IT purchases are \$150,000) (\$ _____)

- Requires three (3) price quotes or equivalent documentation.
- Quotes may be written, emailed, or screenshot.

Sealed Bid / Formal Procurement: more than \$250,000 (\$ _____)

- Publicly advertised, formal solicitation required.
- Award to lowest responsive and responsible bidder.

Non-Competitive Procurement: Only allowed when fully justified.

- Requires prior written approval.
- **Must meet one of the following:**
 - Single-source vendor
 - Emergency threat to life/property
 - Federal awarding agency approval
 - Inadequate competition after formal solicitation

2. Required Documentation for All Purchases

Subrecipients must maintain complete procurement records, including:

- Description of goods/services purchased
- Contract or purchase order

- Proof of competition (**quotes, bids, scoring sheets, advertisements**)
- Cost/price analysis (**when applicable**)
- Conflict-of-interest disclosures
- Invoice, proof of payment, and cleared check details
- Completed procurement compliance worksheet (**attached**)

OEM may request these records at any time, especially during:

- Request for Reimbursement (RFR) review
- Monitoring visits
- Audit preparation
- Risk assessments

This is not new, we have always required subrecipients to provide this information when asked. This isn't to catch you doing something wrong; it is so we can support you in doing things correctly and help us all respond to audits or questions quickly.

3. Oregon-Specific Requirements

- ORS 279B Small Procurement Rules apply to goods/services.
- Prevailing wage may apply for construction/public works above threshold.
- Local rules supersede state rules if more restrictive.
- Entities operating under a Local Contract Review Board (LCRB) must follow their adopted rules.

4. Conflict of Interest Standards

Subrecipients must ensure:

- No employee, board member, elected official, or family member influences procurement decisions for personal benefit.
- Conflicts are disclosed and managed.
- Vendors cannot draft specifications or participate in scoring if they stand to benefit

5. Prohibited Practices

- Splitting purchases to avoid a competitive threshold
- Steering contracts to favored vendors
- Missing or incomplete procurement records
- Using outdated or incorrect procurement thresholds
- Failing to follow the most stringent rule between local, state, and federal

6. OEM Monitoring and Compliance

OEM may request your procurement documentation at any point. Subrecipients must:

- Use these guidelines during onboarding and throughout the project period
- Provide the attached procurement worksheet when requested
- Maintain records for at least 6 years after grant closeout
- Understand that noncompliance may delay or prevent reimbursement

7. Provide Answers to the following:

- Who do we ask questions about your program?
- Who do we ask questions about your procurement and compliance?
- Where are your policies and forms posted online?