

Sponsored Program Purchasing Policy

Policy Number: 100-600-021
Effective Date: April 3, 2007
Last Updated: June 14, 2025
Issuing Authority: Office of the Chief Financial Officer and Treasurer and the Office of the Senior Vice President for Research
Responsible Offices: Academic Departments; Office of Procurement and Contracting (OPC); Sponsored Programs Office (SPO); Office of the Controller

Purpose:

This policy establishes Howard University's procurement requirements for goods and services under sponsored programs while ensuring compliance with [Uniform Guidance \(2 CFR 200.318–.320\)](#), sponsor terms and conditions, and institutional procurement policies.

This policy applies to all purchases made using sponsored program funds at Howard University and its affiliated entities, including Howard University Hospital. In cases where sponsor requirements are more restrictive than institutional policies, the sponsor requirements shall prevail.

Policy:

Howard University ensures that all procurement transactions involving sponsored program funds:

- Comply with sponsor procurement regulations (e.g., federal agencies, private foundations, industry contracts).
- Follow Uniform Guidance procurement standards to ensure competition, transparency, and fairness.
- Are tracked electronically in Workday to enable audit-ready record-keeping and monitoring.
- Adhere to sponsor prior approval requirements where applicable.
- Align with related university policies, including:
 - 200-003: Procurement General Policy (to ensure consistency with university-wide procurement practices)
 - 300-007: Contracting Policy (for contract approval processes and sole-source justification requirements)
 - 300-004: Asset Capitalization Policy

Procurement Methods and Thresholds:

Howard University follows the Uniform Guidance procurement methods ([2 CFR 200.320](#)):

Procurement Type	Threshold	Requirements
Micro-Purchases	≤ \$10,000	No quotes are required, but the price must be reasonable.
Small Purchases	≤ \$250,000	Minimum of three quotes required unless justified.
Sealed Bids & Competitive Proposals	> \$250,000	Full and open competition is required.

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Sole Source (Non-Competitive Procurement)	Varies	Must meet 2 CFR 200.320(c) exceptions and require documented justification.
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- Micro-Purchases must be equitably distributed to qualified suppliers.
- Competitive Bids must be routed through OPC for approval before contract execution.
- All purchases must be processed via Workday.

Business Process Description:

All purchases must be made in accordance with sponsor regulations, sponsored program terms and conditions, and the applicable Howard University purchasing policies.

Purchase Card “P” card:

P-Cards may be used for sponsored program purchases subject to the following conditions:

- Only full-time employees are eligible for P-Cards.
- P-Card purchases must comply with sponsor guidelines and University policies and procedures
- Refer to the Procurement-Purchase Card Policy (300-009) for additional guidance

Workday Procure to Pay Process:

All procurement transactions for sponsored programs must be requested through Workday. The PI/PD is responsible for:

- Completing the purchase request in Workday, including:
 - Detailed description of items or services.
 - Justification if using sole source procurement.
 - Estimated cost and account number.
 - Compliance with sponsor restrictions.
- Ensuring pre-approval is obtained if required by the sponsor (e.g., large equipment purchases).
- Maintaining documentation for audit purposes.
- The requirements follow University policies and procedures. Refer to the Procurement General Policy (200-003) for additional guidance.

Sole Source Justification:

If a purchase cannot be competitively bid, the PI/PD must complete a Sole Source Justification Form, which must be approved by SPO and OPC before issuing a Purchase Order (PO).

- Sole source purchases must align with [2 CFR 200.320\(c\)](#), which allows non-competitive procurement only if:
 - The item is available only from a single source.
 - Public exigency or emergency prevents competitive bidding.
 - The sponsor or agency specifically authorizes noncompetitive procurement.
 - Competitive bids were attempted but deemed inadequate.
- Documentation must be maintained for audit review.
- All contracts related to sponsored program purchasing must follow 300-207 (Contracting Policy).

Roles and Responsibilities:

Principal Investigator (PI/PD): Ensures purchases comply with sponsor regulations, submits purchase requests in Workday, and provides justification for sole source requests.

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Office of Procurement and Contracting (OPC): Reviews purchase requests, issues POs, and ensures compliance with competitive procurement requirements.

Sponsored Programs Office (SPO): Verifies sponsor approvals, ensures compliance with award terms for procurement activities, ensures allowable costs, processes financial reconciliations.

Materials Management Department (MMD): Ensures sponsored program equipment is managed according to 600-028 (Equipment Management Policy).

Compliance and Audit Requirements:

- Procurement records must be maintained for a minimum of three years after the project's end date ([2 CFR 200.334](#)).
- High-risk transactions (over \$50,000) require additional review by the Controller's office before purchase execution.
- Subrecipient purchases must be monitored per 600-014 (Subrecipient Monitoring Policy).
- Periodic internal audits will be conducted to ensure compliance with sponsor regulations.

Related Processes/Events:

- 600-028: Sponsored Program Equipment Management Policy
- 200-003: Procurement General Policy
- 300-007: Contracting Policy
- 600-014: Subrecipient Monitoring Policy
- 600-016: Prior Approval Policy
- 600-023: Subrecipient Invoice Review Policy
- 600-006: Award Acceptance & Setup Policy
- [Office of Research Ticketing System](#)