

Holy Cross School

Written Procurement Policy

Holy Cross School must maintain written policies and procedures that reflect applicable federal, state, and local regulations. These policies should include the following:

- Holy Cross School contracts with a local school, South Portland Schools, to purchase food in bulk for our school nutrition program. Our small purchase threshold is \$250,000.00. If any invoice acquisition is over \$250,000, Holy Cross School will obtain three price quotes and purchase from the lowest.
- All purchases will be necessary and cost effective.
- Purchasing acquisitions will avoid unnecessary or duplicative items.
- All procurements will be conducted in a manner that provides full and open competition, real or perceived unfair advantages will be avoided.
- Holy Cross School will maintain records sufficient to detail the history of procurement acquisitions.
- Holy Cross School will conduct cost price analysis for all formal bids and/or contract modifications.
- Holy Cross School will take steps to assure that small, minority, and women's business enterprises and labor surplus firms are used whenever possible when purchasing goods and/or services.

Holy Cross School

Code of Conduct

Holy Cross School Food Service Program

Policy Name: Written Code of Conduct

Regulations: 2 CFR Part 200.318, formerly 7 CFR Part 3016.36(b)(3), State Procurement Code and Regulations, and Holy Cross School Purchasing.

Procedures: Holy Cross School seeks to conduct all procurement procedures:

- In compliance with stated regulations; and
- To prohibit conflicts of interest and actions of employees engaged in the selection, award and administration of contracts.

No employee, officer, or agent may participate in the selection, award, or administration of a contract supported by a federal, State, or local award if he or she has a real or apparent conflict of interest. Such a conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.

The officers, employees, and agents of the non-Federal entity may neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or parties to subcontracts. However, non-Federal entities may set standards for situations in which the financial interest is not substantial or the gift is an unsolicited item of nominal value.

The standards of conduct must provide for disciplinary actions to be applied for violations of such standards by officers, employees, or agents of the non-Federal entity. Based on the severity of the infraction, the penalties could include a written reprimand to their personnel file, a suspension with or without pay, or termination.

For questions and concerns regarding procurement solicitations, contract evaluations, and award, contact:

Holy Cross School, Principal - 207-799-6661