

SOUTHEAST ARKANSAS WORKFORCE DEVELOPMENT BOARD
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Procurement Policy

Purpose

The purpose of this policy is to define procurement standards and procedures for acquiring goods, services, and subrecipient contracts in accordance with the Workforce Innovation and Opportunity Act of 2014 (WIOA), the WIOA Final Rule, Arkansas State Law, and policies of the Arkansas Workforce Development Board (AWDB) and the Southeast Arkansas Workforce Development Board (SEAWDB).

Reference: 2 CFR Part 200 (Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards)

General Procurement Standards

The SEAWDB and all subrecipients shall adhere to the standards set forth under: - **2 CFR 200.318** (General Procurement Standards) - **2 CFR 200.319** (Competition) - **2 CFR 200.320** (Methods of Procurement) - **2 CFR 200.323** (Contract Cost and Price)

Procurement for the One-Stop Operator (OSO) will primarily use a **Request for Proposal (RFP)** process. SEAWDB reserves the right to reject any or all responses and to negotiate contract details with successful respondents. Contracts may be extended for up to three (3) additional years through a year-by-year renewal process, contingent on satisfactory performance and compliance.

Methods of Procurement

In accordance with **2 CFR 200.320**, SEAWDB recognizes the following procurement methods: 1. **Micro-purchase** – ≤ \$10,000, may be awarded without soliciting competitive quotes. 2. **Small purchase** – > \$10,000 but ≤ \$250,000, requires at least two price or rate quotations. 3. **Sealed bids (formal advertising)** – Used for construction and large

purchases. 4. **Competitive proposals (RFP process)** – Used when sealed bids are not appropriate. 5. **Noncompetitive proposals (sole source)** – Allowed only when circumstances in 2 CFR 200.320(f) are met.

Competitive Procurement Procedures

- **Draft RFP Review:** Draft RFPs will be presented to SEAWDB members for review before public release.
 - **Advertisement/Notification:** Notices will be posted on the SEAWDB website and distributed to a maintained list of potential bidders at least **30 days** before submission deadlines.
 - **Proposal Response Time:** Notices will include scope, funding estimates, instructions, and submission deadlines.
 - **Proposal Evaluation:** Evaluation criteria include completeness, cost reasonableness, WIOA compliance, past performance, and ability to meet targets. Each scoring sheet must be **signed and dated** by evaluators.
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Conflict of Interest Policy

SEAWDB members, SEAEDD staff, and WIOA subcontractors must adhere to conflict-of-interest standards per **2 CFR 200.318(c)(1)**. No employee, officer, or agent may participate in a procurement process where they have a real or apparent conflict of interest.

Discovery and Disclosure

- Individuals discovering a potential conflict must immediately notify their supervisor or the SEAWDB Chairperson and withdraw from the process.
- A **Disclosure of Interest Form** must be signed by each evaluator or committee member before participation.

Violations

Violations may result in dismissal and other applicable sanctions.

Conflict of Interest Mitigation Procedures

When SEAEDD is a potential vendor or subrecipient: - SEAEDD staff are **prohibited** from any involvement in discussions, scoring, or recommendations. - Individuals with potential conflicts must submit **recusal documentation**. - All evaluators must sign a **Conflict of Interest Disclosure Form** prior to accessing proposals. - A **third-party review** (non-SEAEDD representative) will oversee OSO procurements involving SEAEDD.

Internal Oversight Controls

- The **One-Stop Committee** reports directly to the **SEAWDB Chairperson**, ensuring independence.
- All procurement actions must be approved by the **full Board** in an open meeting, with recusals recorded.
- The Fiscal Officer maintains a **Procurement Integrity Log** documenting disclosures and compliance.

Firewalls

Firewalls must ensure transparency, integrity, and impartiality in procurement. These include: - Clear separation of duties and responsibilities. - Confidentiality and non-disclosure agreements. - Documentation of firewall practices in procurement records or meeting minutes.

Training and Annual Review

- Annual **procurement and ethics training** is required for all board and procurement staff.
- Training attendance will be documented and retained.
- The **Executive Committee** will review this policy annually for compliance and recommend updates.

Sole Source Procurement

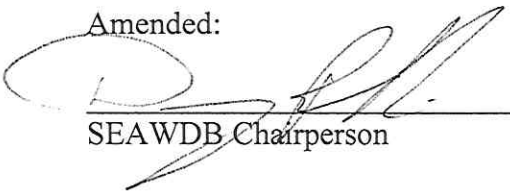
Noncompetitive (sole source) procurement may be used only when: 1. The item/service is available only from one source. 2. A public exigency or emergency prevents delay. 3. The Federal or pass-through entity authorizes it in writing. 4. After solicitation, competition is deemed inadequate.

Written documentation must support any sole-source decision (20 CFR 678.610(b)).

Approved:

SEAWDB Chairperson Date

Amended:

 _____
SEAWDB Chairperson Date

11/6/25
Date