

Review of General Procurement Practices	Cross Reference to MSBA Policies and/or Procedures
1. Does the SFA/LEA have written codes of conduct that include prohibiting real, or apparent conflicts of interest for employees engaged in selection, award, and administration of contracts? [2 CFR 200.318(c)(1)/7 CFR 3016.36(3)(1-1v)]	DJFA- Page 4 (Conflict of Interest #1 and #2)
2) If yes, does the code of conduct:	
a) Prohibit officers, employees and agents from soliciting or accepting gratuities, favors or anything of monetary value from contractors or parties of subcontracts? [2 CFR 200.318(c)(1)]	DJFA – Page 4 (Conflict of Interest #3)
b) Provide for disciplinary actions for violations by officers, employees, or agents? [2 CFR 200.318(c)(1)]	DJFA – Page 4 (Consequences)
3) Does the SFA/LEA's have documented Procurement Procedures? [2 CFR 200.318(a)]	DJF-API
4) Does the SFA/LEA perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications? [2 CFR 200.323(a)]	DJFA –AP1 Page 1 (Allowable Costs) and Page 2 (Reasonable Costs)
5) Does the SFA/LEA take steps to to assure that small, minority and women's businesses enterprises and labor surplus firms are used when possible? [2 CFR 200.321]	DJFA – Page 3 (Bids and Requests for Proposals #1)

Explanation:

DJF: Purchasing (policy)

DJF –AP1: Purchasing (procedures)

DJFA: Federal Programs and Projects (policy)

DJFA – AP1: Federal Programs and Projects - Managing Federal Funds & Allowable Expenses (procedures)

DJFA –AP2: Federal Programs and Projects – Managing Federal Funds & Cash Management (procedures)

DLCA – Travel Expenses (policy)