



Responsible Office: Procurement Operations
Administering Official: Executive Director, Procurement Operations
Revision Date: May 20, 2026
Applicable Policy: Procurement Guidelines No.11 Procedure for Federally
Funded Procurements

Procurement Guidelines are issued by the Executive Director under Article 1
of the Houston City College Procurement Operations Procedures Manual.

Procurement Operations Guidelines for Procedure for Federally Funded Procurements

PURPOSE AND SCOPE

The Procurement Operations Department, which includes Sourcing, Contract Administration, and Small Business Development, is responsible for all procurement activities on behalf of the entire Houston City College System (HCC). This guideline supplements applicable federal regulations, Texas state laws, HCC policies, and Board resolutions governing federally funded procurements and establishes requirements for compliance, competition, documentation, and contract administration.

GUIDELINES

1. **Compliance with Federal Regulations**

All federally funded procurements must follow 2 CFR Part 200 (EDGAR) and any other applicable federal, state, or local regulations to ensure full compliance and accountability.

2. **Allowable Contract Types**

Cost-plus or Construction Manager-at-Risk contracts are prohibited when using federal funds. All agreements must specify a clearly defined not-to-exceed amount.

3. **Purchasing Card Restrictions**

P-Card transactions are not permitted for federally funded purchases unless a written pre-approval verifying cost reasonableness is obtained before purchase.

4. **Encouragement of Small and Minority Business Participation**

Procurement staff must take affirmative steps to include small, minority-, and women-owned businesses and labor-surplus-area firms whenever practicable.

5. **Threshold and Competition Requirements**

Buyers must follow the most restrictive threshold rule applicable to the purchase—federal or state—based on the total contract value. Competitive procurement is required for purchases exceeding micro-purchase and small-purchase limits.

6. **Documentation and Recordkeeping**

Each federally funded procurement must include documentation detailing the method of procurement, rationale for contract type, selection process, and justification for any non-competitive award.

7. **Independent Estimate and Cost/Price Analysis**

For purchases of \$150,000 or more, an independent cost estimate must be completed prior to solicitation. Before award, a cost or price analysis must confirm that pricing is fair and reasonable.

8. **Debarment and Certification Verification**

Buyers must verify that vendors are not suspended or debarred in SAM.gov and must ensure inclusion of all required federal certifications, including Appendix II to 2 CFR Part 200 and Exhibit B.

9. **Ethical Conduct**

Employees involved in federally funded procurements must avoid conflicts of interest and may not solicit or accept gifts, favors, or anything of monetary value from vendors or contractors.

Report any suspected ethical violations or conflicts of interest related to procurement, contracting, or vendor relationships immediately to the HCC Office of the General Counsel at (713) 718-7514.