



Williamson County and Cities Health District

PROCUREMENT POLICY

PURPOSE The purpose of this policy is to outline rules for procurement conducted by authorized Williamson County and Cities Health District (WCCHD) personnel on behalf of WCCHD and to:

- ensure compliance with Federal Uniform Grant Guidance including but not limited to all statutory changes set forth by National Defense Authorization Acts (NDAA) with regard to thresholds and approval processes;
- increase value and reduce risks by having WCCHD employees, and suppliers work together through a purchasing process that is consistent, fair, transparent, and effective;
- conduct all purchasing strictly in accordance with the laws of the State of Texas, federal guidelines and guiding principles of grant requirements;
- ensure standards of conduct to avoid conflicts of interest and governing the actions of WCCHD employees engaged in the selection, award, and administration of contracts.

POLICY It is the policy of WCCHD to have defined, consistent, and fair procurement practices for allowable purchases by WCCHD employees and to ensure that employees follow outlined guidelines and procedures for procurement.

SCOPE This policy applies to all WCCHD employees authorized to purchase on behalf of the Health District.

CONCEPT OF OPERATIONS WCCHD believes that the following ethical principles must govern the conduct of every person who is involved in the purchase of commodities, services, maintenance, professional services, and construction, on behalf of WCCHD:

- Personal Gain - It shall be a breach of ethics to attempt to realize personal gain through public employment with WCCHD by any conduct inconsistent with the proper discharge of the employee's duties.
- Influence - It shall be a breach of ethics to attempt to influence any public employee of WCCHD to breach the standards of ethical conduct set forth in this policy.
- Gratuities - It shall be a breach of ethics to offer, give or agree to give any employee or former employee of WCCHD, or for any employee or former employee of WCCHD to solicit, demand, accept or agree to accept from another person, a gratuity or an offer of employment in connection with any decision, approval, disapproval, recommendation, preparation of any part of a program requirement or purchase request, influencing the content of any specification or procurement standard, rendering of advice, investigation, auditing or in any other advisory capacity in any proceeding or application, determination, claim or controversy, or other particular matter pertaining to any program requirement or a contract or subcontract or to any solicitation or proposal therefore pending before this agency.
- Kickbacks - It shall be a breach of ethics for any payment, gratuity or offer of employment to be made by or on behalf of a subcontractor under a contract to

the prime contractor or higher tier subcontractor for any contract for WCCHD, or any person associated therewith, as an inducement for the award of a subcontract or order.

- Confidential Information - It shall be a breach of ethics for any employee or former employee of WCCHD knowingly to use confidential information for actual or anticipated personal gain, or for the actual or anticipated gain of any person.
- Conflict of Interest - It shall be a breach of ethics for any employee of WCCHD to participate directly or indirectly in procurement when the employee knows that:
 - o The employee or any member of the employee's immediate family has financial interest pertaining to the procurement;
 - o A business or organization in which the employee, or any member of the employee's family, has a financial interest in the procurement; and
 - o Any other person, business, or organization with which the employee or any member of the employee's immediate family is negotiating or has an arrangement concerning prospective employment is involved in the procurement.

RESPONSIBLE PARTIES Individuals who are authorized to make allowable purchases for WCCHD.

ACRONYMS

NDA	National Defense Authorization Acts
SOG	Standard Operating Guideline
SOP	Standard Operating Procedure
WCCHD	Williamson County and Cities Health District
UGMS	Uniform Grant Management Standards

RELATED GUIDELINES AND PROCEDURES

1. WCCHD Procurement Standard Operating Guideline
2. WCCHD Procurement Standard Operating Procedures

REFERENCES

1. General Procurement Standards, Federal Uniform Grant Guidance
2. Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
3. Texas Comptroller of Public Accounts
4. Williamson County Procurement Guidelines
5. Texas Local Government Code