

**PLANO INDEPENDENT SCHOOL DISTRICT**

**PURCHASING**



**MANUAL**

Purchasing Department  
6600 Alma Drive  
Plano, TX 75023



**Table of Contents**

Introduction	3
Legal Considerations	3
Purchasing Commitment and Goals	4
Purchasing Department	5
Purchasing Ethics and Integrity	6
Vendor Gifts and Relations	7
Annual Aggregate	7
Purchasing and Acquisition	8
Competitive Procurement	8-10
RFQ/RFP/Cooperatives	11
Contract Award Criteria/Scoring	12
Sole Source/Ads/Renewals	13
Exceptions to Formal Competitive Purchasing Process	13
Contracted Services – Non-Professional	13
Emergency Procurement	14
Purchase Orders	15-17
Approval Levels	17
Receiving or Releasing Process	17
Retail Card Purchase	18
Price Quotes	18
Change Orders	18
Check Request	19
Employee Reimbursement	19
Awarded and Non-Awarded Vendors	19
Vendor Performance & Inquires	20
Criminal Background Checks	20
Open Records	20
School Property Disposal- Surplus	20
EDGAR and Purchasing Thresholds	21

## **INTRODUCTION**

The purpose of this manual is to provide procedures to promote consistency and implement best practices in procurement for district employees at the campus and department levels.

The primary function of the Purchasing Department is to purchase products/services for:

1. District personnel, to accomplish their goals and objectives.
2. Purchase the goods or services to meet the needs of the District;
3. Obtain the best possible price for the goods or services;
4. Obtain the best value for public dollars expended;
5. Ensure the goods or services available where and when it is needed;
6. Ensure a continuing supply of needed goods and services;
7. Allow responsible bidders a fair opportunity to compete for the government's business, through statutory requirements for competitive bids and proposals aligned with the District procurement procedures.

## **LEGAL CONSIDERATIONS**

The Purchasing Department monitors all purchasing activities, to assure purchasing compliance with all applicable local, state and federal legal requirements.

The procurement function includes, but is not limited to the following:

### **Board Policy**

- [BBFB \(LEGAL\)](#) – Ethics – Prohibited Practices
- [CBB \(LEGAL\)](#) – State Federal Revenue Sources - Federal
- [CH \(LEGAL\)\(LOCAL\)](#) – Purchasing and Acquisition
- [CHG \(LEGAL\)](#) – Purchasing and Acquisition – Real Property and Improvements
- [CHH \(LEGAL\)](#) – Purchasing and Acquisition – Financing Personal Property Purchases
- [CV \(LEGAL\)\(LOCAL\)](#) – Facilities Construction
- [DBD \(LEGAL\)\(LOCAL\)](#) – Employment Requirements & Restrictions – Conflict of Interest
- [DH \(LEGAL\)\(LOCAL\)](#) – Employee Standards of Conduct

### **State Statutes**

- [Texas Education Code Chapter 44](#) – Fiscal Management - Subchapter B
- [Texas Local Government Code Chapter 171](#) – Regulation of Conflicts of Interest of Officers of Municipalities, Counties and Certain Other Local Governments
- [Texas Local Government Code Chapter 176](#) - Disclosure of Certain Relationships with Local Government Officials: Providing Access to Certain Information
- [Texas Local Government Code Chapter 271](#) – Subchapter B – Competitive Bidding on Certain Public Works Contracts
- [Texas Local Government Code Chapter 271](#) – Subchapter D – State Cooperation in Local Purchasing Programs

- [Texas Local Government Code Chapter 271](#) – Subchapter Z – Miscellaneous Provisions
- [Texas Government Code Chapter 791](#) – Interlocal Cooperation Contracts
- [Texas Government Code Chapter 2254](#) – Professional and Consulting Services
- [Texas Government Code Chapter 2269](#) – Contracting and Delivery Procedures for Construction Projects
- [Texas Agriculture Code Chapter 150](#) – Imported Meat

### **Federal Regulations**

- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.67](#) – Micro- purchase
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.317](#) – Procurement by States
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.318](#) – General Procurement Standards
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.319](#) – Competition
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.320](#) – Methods of Procurement to be followed
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.321](#) – Contracting with Small and Minority Businesses, Women’s Business Enterprises, and Labor Surplus area firms
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.322](#) – Procurement of recovered materials
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.323](#) – Contract Cost and Price
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.324](#) – Federal Awarding Agency or Pass-Through Entity Review
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.325](#) – Bonding Requirements
- [Education Department General Administrative Regulations \(EDGAR\) – Part 200.326](#) – Contract Provision

### **PURCHASING COMMITMENT AND GOALS**

The Plano Independent School District Purchasing Department is under the Division of Business Services. The primary function of the Purchasing Department is to support the Plano Independent School District by procuring the needed resources through prudent purchasing practices and excellent customer service. At the same time, the expenditure of public funds requires that ethical standards govern every aspect of the District’s procurement function.

The goal is to assist staff in acquiring needs when they are needed. This goal will be performed in a manner that is efficient and sensitive to the needs of staff and students, however, all legal and district policies must be adhered to at all times. The purchasing office strives to be knowledgeable in the needs

of the district and provide for those needs. The Purchasing Department provides support and guidance regarding district policies and procedures for purchasing products, materials, and services at the best value in a manner consistent with local, state, and federal guidelines, Board of Education policies, ethical business practices, and exceptional customer service.

District employees must discharge their duties impartially to assure fair competitive access to governmental procurement by responsible contractors/vendors. Moreover, they must conduct themselves in a manner that fosters public confidence and transparency in the District. The Purchasing Department staff is available to discuss and assist in any special situations and will facilitate a solution in the best interest of the District.

The procedures contained in this manual are intended to comply with applicable procurement laws, policies and procedures regarding the use of District operating and funds designated for a particular purpose. These procedures also govern Campus Activity Funds, which must also follow District purchasing procedures.

In the event of a conflict between this manual and policy/law, the appropriate policy/law shall prevail.

The Purchasing Department shall develop appropriate procedures to assure:

- Purchases are made in accordance with appropriate statutes, regulations and Board policy;
- The existence of an approved vendors list, which have a record of good products, services, and prices;
- Advertising for the procurement of goods and services and for the sale of used, obsolete, and surplus materials, supplies, and equipment;
- The existence of current specification files and expertise in developing meaningful product and service specification.

Contact the Purchasing Department for clarification regarding specific procedures or unique purchases that may fall outside of the procedures of this manual.

Purchasing Department:

Executive Director of Purchasing	Veronica Couzynse	ext. 20290
Assistant Director Purchasing	Tina Tomson	ext. 20285
Office Manager	Dawn DeJean	ext. 20286
Contract Specialist	Christine Platt	ext. 20287
Buyer	Debbie Bowen	ext. 20283
Buyer	Mandy Palazzo	ext. 20289
Buyer	Kathy Schadt	ext. 20284
Buyer	Brandi Dahlquist	Ext. 20296

**PURCHASING ETHICS AND INTEGRITY**

The Purchasing department fosters fair, ethical and legal trade practices. The competitive nature of the public purchasing arena and the expenditure of significant amounts of public funds require ethical stands be incorporated into the foundation of all purchasing functions. Purchasing personnel and school district staff face the difficult tasks of developing good vendor relations and encouraging vendor competition while avoiding even the appearance of favoritism or other ethical misconduct.

## CODE OF ETHICS

- Avoid the intent and appearance of unethical or compromising practice in relationships, actions and communications.
- District employees shall not authorize separate, sequential, or component purchases to avoid requirements of Section 44.031(a) or (b).
- Demonstrate loyalty to the District by diligently following the lawful instructions, procedures and policies using reasonable care while exercising only the authority which has been delegated to you.
- Refrain from any private business or professional activity that would create a conflict between personal interest and the interests of the District. District employees shall not participate directly or indirectly in procurement when the employee or the employee's family member has a financial interest pertaining to the procurement.
- Refrain from soliciting or accepting money, loans, credits, discounts, gifts, entertainment, favors or services from present or potential vendors.
- Handle confidential or proprietary information with due care and proper consideration of ethical and legal ramifications and government regulations.
- Promote positive supplier relationships through courtesy and impartiality.
- Know and obey the letter and the spirit of laws governing the purchasing function and remain alert to the legal ramifications of all purchasing decisions.
- Ensure that all segments of society have the opportunity to participate in governmental contracts.
- Enhance the stature of the purchasing profession by improving technical knowledge and adhering to the highest ethical standards.

Common ethical standards relating to conflicts of interest, financial interest in firms conducting business with the school district, kickbacks and gratuities, and improper use of a position or confidential information is to be communicated throughout the schooldistrict.

Additionally, school district personnel should be made aware of the penalties for violations of purchasing laws and ethics, which may include criminal prosecution, and loss of employment opportunities. All District staff members are public servants and subject to Title VIII of the Penal code, regarding offenses against public administration, including bribery and corrupt influence (Chapter 36), perjury and other falsification (Chapter 37), obstructing governmental operation (Chapter 38), and abuse of office (Chapter 39). All District staff members shall perform their duties in conformity with District policy, ethical standards for professional educators, and state and federal law.

### **VENDOR GIFTS AND RELATIONS**

School district officials and employees cannot accept anything of value from a vendor, such as personal gifts or gratuities, which may be construed to have been given to influence the purchasing process.

Although such practices may be legitimate and generally accepted in the private sector, giving and receiving gifts in the public sector may constitute a violation of the law.

NOTE: "Gift to a Public Servant" is a Class A misdemeanor offense if the recipient is a government employee who exercises some influence in the purchasing process of the governmental body.

Another legal consideration is the disclosure of conflict of interest by board members. If a board member

of member of the family (as identified by law), has a financial interest in a business entity(s), they are required to disclose this relationship through the execution of an affidavit.

Board members should abstain from voting on award of contracts to businesses in which they or a family member have a financial interest.

School districts should also be aware of the disclosure requirements regarding deferral conflict of interest regulations that prohibit an employee (and members of the employee's family) who is involved in administering, directing or authorizing federally funded transactions.

### **ANNUAL AGGREGATE**

The Texas Education Code Chapter 44 defines the methods of procurement to be utilized by school districts based on the amount to be spent over a 12-month period. The District has established its fiscal year as the 12-month period to comply with annual aggregate value of a category of goods or services. The Plano ISD fiscal year begins in July 1 and ends in June 30. All expenditures are considered in the aggregate and all locations in the District are considered one unit.

In order to determine the level of expenditures, the Purchasing Department has developed a group of commodities based on those listed in the Texas Education Agency Financial Accountability System Resource Guide.

Examples of these commodities include but are not limited to:

Athletic Supplies	Awards, Trophies, Plaques	Laminating Film & Laminators
Office Supplies	Instructional Materials	Musical Instruments
Library & Classroom Books	Moving Services	Food Catering
Furniture	Custom Printing	Science Supplies
Athletic Supplies	Cheerleading/Drill Team Supplies	Markerboards
Group Travel	Periodicals	Calculators
Health Supplies	Armored Car Services	Floral Needs/Decorations
Formalwear	Copiers	Sheet Music Supplies
Traffic Signs	Theater Supplies	Food & Local Retail

### **PURCHASING AND ACQUISITION – POLICY CH (Local)**

*Purchasing Authority* – The Board delegates to the Superintendent or designee the authority to make budgeted purchases unless:

1. State law requires the Board to make or approve a purchase; or
2. The purchase costs exceed \$50,000, an amount that shall require Board approval. The purchase of budgeted regulated utility services and payments for professional services contracts that the Board has previously awarded shall not require additional approval.

*Purchasing Method* – The Board delegates to the Superintendent or designee the authority to determine the method of purchasing in accordance with CH (LEGAL).

## **COMPETITIVE PROCUREMENT OPTIONS:**

The Purchasing Department coordinates the complete process for the district bids, requests for proposals and all other methods prescribe by law. The process includes but is not limited to scheduling the timeline, assisting in the preparation of bid/proposal documents and bid/proposal specifications, maintaining a vendor list, distributing the bid/proposal documents to interested vendors, assisting in the analysis of the vendor response and facilitating the award process. The timeline for a formal proposal varies according to the item or service procured and the complexity of the project.

Texas Education Code 44.031 (a); (b), states that all contracts, except contracts for the purchase of produce or vehicle fuel valued at \$50,000 or more each 12-month period are to be made by the method or methods that provide the best value to the district. The law enumerates several options for competitive procurement that are available to school districts.

These methods include:

1. Competitive bidding for services other than construction services;
2. Competitive sealed proposals for services other than construction services;
3. Request for proposals, for services other than construction services;
4. Inter-local contracts;
5. Method provided by Chapter 2269, Government Code, for construction services;
6. Reverse auction procedures as defined by Section 2155.062 (d) Government Code; or
7. The formation of a political subdivision corporation under Section 304.001, Local Government Code

### **Competitive Bidding:**

Competitive bidding is a formal process that may also be referred to as competitive sealed bidding, sealed bidding or formal bidding. It is an option available to school districts for the procurement of goods and services. The purpose of competitive bidding is to stimulate competition and obtain the lowest practice price for the work, service and/or item(s) needed. The competitive bidding process requires that bids be evaluated and awards made based solely upon bid specifications, terms and conditions contained in the request for bid document, and, according to the bid prices offered by vendors and pertinent factors that may affect contract performance.

The advertisement for bids, description in the request for bids of item(s), work and/or services and specific terms and conditions must be done in a manner that stimulates competition and obtains the lowest practical price. A request for bids contains the following elements:

- Purchase description or specifications covering the item(s)/service(s) to be obtained
- Work and/or service needed
- Terms and conditions for the proposal bid contract
- Time and place for opening bids and other provisions

The bid process should be structured and incorporated into school district purchasing procedures.

This process includes:

- Development of clear specifications by Architect or Engineer
- Request for Bid should include construction documents, estimated budget, project scope, estimated project completion date, and other information a contractor may require to submit bid;
- Advertising of competitive bids
- Responding to vendor questions
- Procedures for opening and tabulating the bids (vendor names and pricing will be read at bid opening)
- Analysis of the bids to ensure compliance with requirements (price will determine who will be awarded a contract)
- Recommendation to the Board of Trustees; and Approval

Competitive bidding is further defined and the specifications for bid documents and newspaper advertisements as well as other terms and conditions pertinent to the competitive bid process are found in the Handbook on Purchasing for Texas Public Schools, Junior Colleges and Community Colleges (FASRQ).

The District may reject any and all bids.

### **Competitive Sealed Proposals:**

The competitive sealed proposal process is an alternative to competitive bidding. The terms and conditions of the competitive sealed proposals are identical to those for competitive bidding except that an important difference exists regarding the finality of the initial offers. Under competitive sealed proposals, changes in the nature of a proposal, and in price, may be negotiated after proposals are opened. In contrast, changes in the price of goods and services are not negotiable in the competitive bidding process. The competitive sealed proposal process provides for full competition among proposals and allows for negotiation with the proposer or proposers to obtain the best services or goods at the best price. Competitive proposal procedures are recommended where other procurement procedures are not required according to state or federal rules, laws or regulations, in order to stimulate competitive prices for goods and services.

This process includes:

- Development of clear specifications by Architect or Engineer
- Request for Bid should include construction documents, estimated budget, project scope, estimated project completion date, and other information a contractor may require to submit bid;
- Advertising of competitive bids
- Responding to vendor questions
- Procedures for opening and tabulating the bids (vendor names and pricing will be read at bid opening)
- Analysis of the bids to ensure compliance with requirements; District will score and rank based on evaluation criteria in proposal and can negotiate price associated with modification. District can negotiate with one vendor at a time. If no agreement is reached, negotiation will cease, and negotiations will move on to the next highest ranked vendor.
- Recommendation to the Board of Trustees; and Approval

### **Construction Manager Agent (CMA)**

- 1.) CMA acts as a fiduciary agent of the District providing consultation or administrative services during the design and construction phase and will manage multiple contract with various construction prime contractors;
- 2.) CMA will not perform any aspect of the construction, rehabilitation, alteration or repair of facilities;
- 3.) CMA is selected via Request for Qualifications (RFQ) and manages the contractor that is picked by the district.

### **Construction Manager at Risk (CMR)**

- 1.) CMR works with the architect or engineer during the design phase serves as the general contractor during the construction phase;
- 2.) CMR is selected in a one step process (fees are included in proposal) or a two-step process (no fees are included in proposal);
- 3.) CMR will publicly advertise bids or proposals from trade contractors for performance of all major elements of the project.

### **Design Build**

- 1.) A single entity will provide both design and construction service for the construction, rehabilitation, alteration, or repair of a facility;
- 2.) The entity is chosen via Request for Qualifications (RFQ) and should include general information on the project site, project scope, special systems, selection criteria and the weighted value for each criteria;
- 3.) District can negotiate with one vendor at a time. If no agreement is reached, negotiation will cease, and negotiations will move on to the next highest ranked vendor.

### **Job Order Contract**

- 1.) Used for the maintenance, repair, alteration, renovation, remediation, or minor construction of a facility when the work is a recurring nature, but the delivery times, type, and quantities of work required are indefinite;
- 2.) May be awarded to one or more contractors in connection with each solicitation of proposals;
- 3.) May use Competitive Sealed Proposal for job order contracts.

### **Request for Qualification**

Usually done for professional services which include certified public accountants, physicians or any other professional service. (Government Code 2254.001-0005)

- 1.) May require a state or federal license;
- 2.) If vendor is submitting proposal for architectural or engineering services, they may not submit fees with their proposal;
- 3.) The District will not select a provider based on fees but instead based on competence and qualifications;
- 4.) The District will first select the most highly qualified provider then attempt to negotiate a contract for a fair and reasonable price;
- 5.) If a fair and reasonable price cannot be negotiated, the District will end negotiations (in writing) with the vendor and begin negotiations with the second ranked vendor;
- 6.) The District will continue negotiations in this manner until a contract is successfully negotiated.

It should be noted that once negotiations are stopped with a vendor, the District must keep moving forward through the ranked vendors. Once negotiations with a vendor are terminated, the vendor becomes ineligible for award.

### **Request for Proposal (RFP)**

A Request for Proposals (RFP) is a part of the competitive sealed proposal process. The RFP is the mechanism that generates the receipt of competitive sealed proposals and should contain several key elements, at a minimum: Advertisement, Terms and Conditions, Specifications/Scope of Work, Offer Form, Proposal Document and other forms as required by law.

### **Inter-local Contract/Purchasing Cooperatives:**

A district can contract or agree with another local government, including a nonprofit corporation that is created and operated to provide one or more governmental functions and services, or with the state or a state agency, including the General Services Commission, to purchase goods and any services reasonably required for the installation, operation or maintenance of goods. The purpose of an inter-local contract may be to study the feasibility of using an inter-local contract to perform a governmental function or service, or to provide a governmental function or service that each party to the contract is authorized to perform individually.

Local governments that are parties to an inter-local contract for the performance of a service may, in performing the service, apply the law applicable to a party as agreed by the parties. (Section 791.012, Government Code)

Requirements for inter-local contracts include:

- Authorization by the governing body of each party of the contract
- Statement of the purpose, terms, rights and duties of the contracting parties
- Specifications that each party paying for the performance of governmental functions or services must make those payments from current revenues available to the paying party.

Inter-local contractual payments must fairly compensate the party who performs the services or functions under the contract. In addition, the parties to an inter-local contract may create an administrative agency or designate an existing local government to supervise the performance of the contract. Consequently, the agency or designated local government can employ personnel, perform administrative activities and provide administrative services necessary to perform the inter-local contract. (Section 791.011-791.025, Government Code)

A centralized purchasing function can also be performed on a regional level through a cooperative/interlocal agreement among districts or the regional education service center. If the district participates in a cooperative purchasing program, it satisfies any law requiring it to seek competitive bids. *Local Government code 791.001, 791.011, 791.025.*

Plano ISD participates in several cooperatives such as TASB's Buyboard, The Cooperative Purchasing Network (TCPN) US Communities, Department of Information Resource (DIR), Harris County Department of Education (HCDE) Choice Partners, The Interlocal Purchasing System (TIPS), Goodbuy, Equalis, Sourcwell, Texas Multiple Awards Schedule (TXMAS), National Cooperative Purchasing Alliance (NCPA), Allied States, Educational Purchasing Cooperative of North Texas (EPCNT), Purchasing Association of Cooperative Entities (PACE), Purchasing Solutions Alliance (PSA), E&I Cooperative Services. If assistance is needed in obtaining information about any of these cooperatives, staff should contact the Purchasing Department.

**Contract Award Criteria:**

In determining to whom to award a contract, the district shall consider:

1. The purchase price;
2. The reputation of the vendor and of the vendor's goods or services;
3. The quality of the vendor's goods or services;
4. The extent to which the goods or services meet the district's needs;
5. The vendor's past relationship with the district;
6. The impact on the ability of the district to comply with laws and rules relating to historically underutilized businesses;
7. The total long-term cost to the district to acquire the vendor's goods or services;
8. For a contract for goods and services, other than goods and services related to telecommunications and information services, building construction and maintenance, or instructional materials, whether the vendor or the vendor's ultimate parent company or majority owner:
  - (A) Has its principal place of business in this state; or
  - (B) Employs at least 500 persons in this state; and
9. Any other relevant factor specifically listed in the request for bids or proposals.

**Scoring Process for Construction Projects**

Points for pricing will be calculated in the following manner: 1.) Lowest price bid will receive maximum points for price allowed as stated in RFP; 2.) All other vendors are allotted points based on how close they are to the lowest price. Once scores for purchase price, past performance, and quality of vendors goods or services are calculated, each individual score is place in a spreadsheet to determine ranking.

Cost	Qualifications	Reputation	Experience	District Needs
30 points	20 points	20 points	20 points	10 points

**Sole Source**

Selected purchases may be exempt from competitive procurement if they meet the established criteria for sole source purchase:

- Identification and documentation that competition in providing the item or product to be purchased is precluded by the existence of a patent, copyright, secret process or monopoly;
- a film, manuscript, or book;
- a utility service, including electricity, gas, water (if available through a single source);
- a captive replacement part of component of equipment
- Sole source does not apply to mainframe data-processing equipment and peripheral attachments with a single item purchase price in excess of \$15,000.

Otherwise, to be a bona fide exemption to Texas Education Code 44.031(a) as a sole-source purchase, there must be no other like items available for purchase that would serve the same purpose or function and there must be only one source for the product because of exclusive distribution or marketing rights.

There are very few sole source vendors with the increased shopping options on the internet and more competition than previously available.

Sole source purchases over \$50,000 will require School Board approval prior to the transaction.

The end-use will need to complete Sole Source Form from the purchasing website. The form will go

directly to the vendor for completion and signature. Once the vendor submits the form, purchasing will review the request for approval. The Sole Source Form and a list of approved Sole Source vendors can be found: <http://inside.pisd/business/purchasing/SoleSourceInformation.shtml>

### **Advertisement**

Under Texas Education Code 44.033 (b), a notice of the time by when and place where the bids or proposals, or the responses to a request for qualifications, will be received and opened shall be published in the county in which the district's central administrative office is located, once a week for at least two weeks before the deadline for receiving bids, proposals, or responses to a request for qualifications. The two-week advertisement requirement is a minimum requirement, additional time may be necessary based on the complexity of the bid/proposal. In addition to the newspaper, Plano ISD may utilize websites such as the Texas Comptroller's website to advertise bid/proposal opportunities to increase its competitive environment.

### **Conditions for Renewal**

The District may award multiple year contracts that can be renewed on or before their annual expiration date. These term contracts may have renewal option clauses, thereby allowing the district and the vendor to continue the contractual relationship for an extended period. The Board of Trustees approves the length and number of renewal options allowed.

### **Exceptions to Formal Competitive Purchasing Process – Professional Services**

Under Texas Education Code 44.031 (f), competitive procurement statutes do not apply to a contract for professional services rendered, including services of an architect, attorney, certified public accountant, engineer or fiscal agent. A school district may, at its option, contract for professional services rendered by a financial consultant or a technology consultant in the manner provided by Section 2254.003, Government Code, in lieu of the methods provided by this section.

Competitive bids shall not be solicited for professional services of any licensed or registered:

- Certified public accountant
- Architect
- Landscape architect
- Land surveyor
- Physician, including a surgeon
- Optometrist
- Professional engineer
- State-certified or state-licensed real estate appraiser
- Or registered nurse

Professional services are not selected based on competitive bidding, but are rather selected based on demonstrated competence and qualifications obtained through a Request for Qualifications. After the District makes its selection based on demonstrated competence and qualifications, a fair and reasonable price for the services is then negotiated and agreed upon.

Professions not listed as Professional services should be considered Contracted Services and must adhere to the same procurement guidelines as any other purchase.

### **Contracted Services (Non-Professional)**

Professions not listed as Professional Services should be considered Contracted Services and must adhere to the same procurement guidelines as any other purchase.

### **Emergency Procurement**

Under Texas Education Code 44.031 (h), if school equipment or a part of a school facility or personal property is destroyed, severely damaged, or experiences a major unforeseen operational or structural failure, and the Board of Trustees determines that the delay posed by the contract methods required by this section would prevent or substantially impair the conduct of classes or other essential school activities, then contracts for the replacement or repair of the equipment or portion of the school facility may be made by a method other than the methods required by this section. Use of the exception to competitive procurement is only available with prior Board of Trustees approval.

Two types of emergency purchases are possible. One type results from an eminent threat to the health, safety, or welfare of students. Such purchases must comply with state law and may be made only after a formal board action declaring an emergency and authorizing the purchase. An example of an emergency purchase of this type is the authorization to repair a school after a fire or a natural disaster. The second type of emergency may be defined as food freezers needing immediate repair to prevent the spoilage of food. In this type of emergency, facilities is authorized to use the purchasing card to purchase materials/parts required to make the repair. A detailed explanation must be submitted with the itemized receipt.

### **PURCHASE ORDERS**

A purchase order is an official request for goods/services by the district to a vendor. Acceptance of a purchase order by a vendor forms a contract between the district and the vendor. A purchase order indicates to a vendor the detailed description, quantities, and prices.

#### **Purchase Orders– Plano ISD Board Policy (CH Local)**

“All purchase commitments shall be made by the Superintendent or designee on a properly drawn and issued purchase order, in accordance with administrative procedures, including the District’s purchasing procedures.”

An authorized purchase order provides budgetary controls by encumbering funds for purchases from approved vendors. Purchasing goods and requesting reimbursements after the fact is not only unlawful but does not ensure money is available to cover the expense.

#### **Purchase Orders – Responsibility of Debt (CH Local)**

The Board shall assume responsibility for debts incurred in the name of the District so long as those debts are for purchases made in accordance with the adopted budget, state law, Board policy, and the District’s purchasing procedures. The Board shall not be responsible for debts incurred by persons or organizations not directly under the Board control. Persons making unauthorized purchases shall assume full responsibility for all such debts.

Employees are not permitted to purchase supplies or equipment for personal use through the District’s business office.

## **The Purchasing Process**

1. A product or service is identified by the district as a need
2. District wide spending is evaluated
3. A competitive procurement processes is performed by the purchasing office
4. Evaluation and recommendation is made and approved by the Board
5. A requisition is created for the product/service with approved vendor
6. The requisition is reviewed by purchasing for final approval
7. Once approved, the purchase order is sent to the vendor
8. The order is received and verified to be correct
9. Invoices are sent to Accounts Payable
10. Payment is sent to the vendor within 30 days for products/services received

## **PURCHASE ORDER INITIATION**

As its name implies, this document serves as a formal order (contract offer) for goods, materials and/or services from a vendor. A PO, after the final approval process, is a binding commitment for a district to remit payment to the vendor after the district receives the items.

A PO is also an important accounting document. It should contain information on the expenditure to be made and the account code to be charged. Once issued, the PO encumbers funds, which serves as an expenditure control mechanism. Finally, the PO is utilized in the accounts payable process as it documents that an order has been placed and is acceptable by the user, and the user can make payment to the vendor upon verified receipt. The receiving process from the user is a very important process.

Until a PO receives final authorization/approval, it is a purchase requisition. Those individuals having proper authority should initiate requisitions. The appropriate person should approve requisitions, initiated by personnel with budget code access. The appropriate person is the principal, department head, division administrator, or superintendent. The program administrator should approve requisitions that require expenditures from the Special Revenue Funds. Close supervision and monitoring of the availability of budget dollars and of the approval process for requisitions is an important element of a district's purchasing process.

### **Components of a Requisition:**

- Detailed (line-item) description of the good or services being requested
- Quantity requested
- Bid Reference Information
- Suggested Vendor
- Appropriate Account Code
- Pricing per unit, extended and in total
- Any applicable payment terms
- Discount, if applicable
- Shipping arrangements, if applicable

Upon final approval by the Purchasing Department, the requisition becomes a purchase order.

The online requisition initiated by PISD staff is only a requisition until final approval by the Purchasing Department. Placing an order with a vendor PRIOR to final approval or faxing a "print screen" of the

entered requisition or any other unauthorized document is a violation of administrative regulations. Ordering without a PO is a violation of district policy (CH Local) and is considered a “Non-Compliant” purchase. All “Non-Compliant” purchases regardless of the dollar amount, present problems and the purchasing department must be notified.

When a campus or department places an order prior to the issuance of a purchase order, it is considered a “Non-Compliant” purchase and is a purchasing procedure violation. A “Non-Compliant” purchase is any one of the following:

- A purchase order that is issued after an item has been received or picked up
- A purchase order that is issued after a service has begun or been completed
- A preview item that is delivered without a purchase order and is then purchased
- Calling in the order to the vendor prior to receiving a copy of the purchase order
- Sending the purchase requisition to the vendor in advance of the purchase order

### **Corrective Action for Non-Compliance**

[A Financial/Purchasing Policy Acknowledgment Form](#) must be completed explaining the reasons why proper purchasing procedures were not followed. The form will be signed by the staff member authorizing the non-compliant purchase and their supervisor.

### **Traditional Purchase Order**

A traditional PO is issued to an approved vendor for a one-time line item purchase that specifies the goods or services ordered with the quantity, pricing and account number.

[How to Create Traditional Requisition in TEAMS;](#) [How to Create a Punchout Requisition](#)

### **Project Purchase Order**

A project purchase order is issued to an approved vendor authorizing purchases over a period of time. A project PO is valuable as it allows the purchase of items quickly. A project PO usually reduces both paperwork and related processing costs. However, project PO’s are intended for individual projects. Project PO’s are issued so that supplies, materials or services are available “as needed” by user departments. Project PO’s are requested by user departments and if approved by Purchasing, issued to vendors. [How to Create a Project Purchase Order in TEAMS.](#)

### **Not to Exceed Purchase Order**

This is a purchase request to an approved vendor for a one-time purchase for a maximum of \$250. [How to Create a Not To Exceed Purchase Order in TEAMS.](#)

### **Warehouse Order**

Plano ISD maintains a warehouse that keeps commonly used items in stock. A warehouse requisition is created in TEAMS and then delivered by distribution to the school or department that requested the items. [How to Create Warehouse Requisition- Warehouse Items.](#)

### **Approval Levels**

The Purchasing Department CANNOT approve and/or convert a requisition into a purchase order until the requisition has met all levels of security and has been approved by the staff member associated with the specific level of budgetary security. The Purchasing Department will review the purchase requisition and provide final approval verifying compliance with the District’s purchasing procedures.

## **Receiving/Releasing**

Once goods have been received or services have been rendered, purchase orders must be “received” or “released” in the district’s financial software system (TEAMS). When orders are shipped directly to campuses/departments, items must be “received” in the system immediately by the secretary/bookkeeper to avoid delays in payment of invoices. When items are shipped directly to the campus/department, extreme care and attention to detail shall be used to ensure all items ordered are actually received in acceptable condition. If damaged or otherwise unacceptable items are received, the vendor shall be notified immediately. Prior to requesting payment on project purchase order, the funds must be “released” in the district’s financial software system (TEAMS) and the invoice must be submitted to Accounts Payable for payment.

## **Retail (Credit) Card Purchases**

The Retail Card is a VISA card issued by Bank of America in the name of Plano ISD. All purchases made on the retail card must be for appropriate district purchases as outlined in the [Retail Card Manual](#). The retail card is not intended to avoid or bypass appropriate purchasing or payment procedures due to time constraints but to complement the existing processes available. Prudent, good business judgment must be exercised at all times when making a purchase with a District retail card. The purchase of personal items is strictly prohibited and in violation of policy. Personal purchases will be considered misappropriation of District funds. Improper card use may result in card cancellation and disciplinary action, which could result in termination of employment! Retail card privileges may be revoked at any time if the card user fails to follow all District policies and procedures for retail card use.

To make a purchase with the retail card the card requestor will complete the Plano ISD Retail Card Request Laserfiche Form. Purchasing pre-approval is required for purchases over \$250. A Retail Card Request is entered in TEAMS providing detail of items to be purchased from the approved list of credit card vendors. Once approved by all appropriate administrators/departments, purchasing will load the retail card with the approved amount in the Bank of America Works Program after making the purchase, the retail card and the receipt will be immediately submitted to the Office Manager. The actual amount spent will be released in TEAMS retail card request and the scanned receipt will be attached.

## **Price Quotes:**

To obtain the most competitive price, a district at its option, may obtain price quotes for items costing less than \$50,000. The district’s purchasing procedures should clearly define the lower figure for which quotes are required and obtain and retain written verification of the prices quoted. A quote is not required from a Sole Source vendor.

The purchasing process from approved vendors consists of the following controls:

- Have available budgeted funds and received approval from supervisor
- Obtain quotes as follows (Non-Federal Funds):
  - Purchases under \$3,499 will be made from any District approved vendor (1 quote)
  - Purchases over \$3,500 to \$9,999 recommend two or three price quotes (may be documented telephone quotes, website, ads)
  - Purchases over \$10,000 require three written quotes
  - Purchases over \$50,000 will be formally bid by the Purchasing Department
- Attach quote documentation to requisition for review and approval
- Some quotes are only valid for specific period of time so if the requisition is not entered accordingly, the quote is expired.
- NOTE: If using a cooperative, cooperative name and contract number MUST be on quote.

### **Change Orders**

Staff is required to complete [a Purchase Order Change Request Form](#) when requesting a change to a purchase order. Price modifications are allowed up to 25% over the original amount of the purchase order. Modifications exceeding 25% require approval from the Executive Director of Purchasing.

### **Check Requests**

This type of payment request is used to pay vendors for entry fees, admission to camps, American Express payments, registration fees, membership dues and various other payments.

[How to Create Check Request](#)

### **Employee Reimbursements**

Employees are reimbursed in TEAMS through the Employee Reimbursement module. Employee reimbursements for purchases should be kept to a minimum as purchases are to be made with a Purchase Order or Retail Card. The intent is not to circumvent the procurement laws and procedures of the district. The maximum allowable employee reimbursement for purchases is \$100. All employee reimbursement requested for purchases over the \$100 max. limit, must be accompanied with a Finance/Purchasing Acknowledgement Form.

Other allowable employee reimbursements include travel expenses such as allowable meal or allowable mileage reimbursements. Always provide a detailed explanation for the travel expense as well as an itemized receipt and the approved Request to Travel Form. All employee reimbursements are directly deposited into the employee's primary checking account once the employee reimbursement request is approved by all appropriate levels. [How to Create Employee Reimbursement](#)

### **Awarded Vendors**

All Plano ISD vendors must have an assigned vendor number in TEAMS in order to request a requisition or check request. Requests for new vendors are reviewed and approved by the Purchase Department.

[How to Create New Vendor Request](#)

The Plano ISD Vendor List is established as a result of responses to solicitations originating from the Purchasing Department. It is also inclusive of vendors available through cooperative contracts and other inter-local agreements. All effort should be made in utilizing the product and service provided by vendors who are District approved vendors or members of a cooperative. The vendor list can be found on [inside.pisd/business/purchasing](#) by category, vendor name or contract. The expiration date should be noted when selecting vendors. Requests entered into TEAMS should indicate the applicable bid reference for each purchase and care must be given to the level of the expenditure and any further requirements that may be necessary prior to the initiation of a purchase request.

An approved vendor is a vendor who:

- Has been awarded by Plano ISD through its own bidding process
- Has been reviewed and approved by purchasing for use through a purchasing cooperative or interlocal agreement
- Has completed and submitted all forms/documents required by the district. May include but not limited to:
  - W-9 (Verified via IRS website by Purchasing)
  - Conflict of Interest Form (CIQ)
  - Felony Conviction Form
  - EDGAR Vendor Certification Form (SAM Check completed by Purchasing)

## **Purchasing From Non-Awarded Vendors**

District schools/departments should purchase products/services from awarded vendors even if the cost may seem higher. Approved vendors must process a large number of forms and comply with the District's terms and conditions. Approved vendors must also deliver and bill correctly so expenditures are tracked. Many vendors may decline to submit a bid to the District, which requires a large number of forms and compliance with the District terms and conditions. The Purchasing Department will work closely with vendors to encourage their participation in the bid process and work hard to get the best pricing from existing vendors.

If a staff member requests to purchase from an unapproved vendor – NOT CURRENTLY on the districts approved vendor list, several questions have to be reviewed.

- Are the items available from an existing approved vendor or will a new bid/proposal need to be processed and board award for this purchase?
- What is the estimated cost of this purchase?
- Does it qualify for the bid, proposal or the quote process?
- Can this item be purchased from a purchasing cooperative?
- Can this item be purchased using another district's current contract through an inter-local agreement with the school district?

The purchasing department must consider all information known about the purchase request prior to approving the purchase method and/or approving a new vendor. This information is gathered to protect the district against any possible unlawful purchase.

## **Vendor Performance**

A system for the evaluation of vendors and their performance is important to support an effective purchasing function. Factors to consider for inclusion in the evaluation are:

- Analysis of timeliness and accuracy of product delivery
- Review of compliance with contractual terms for prices
- Service availability
- Completeness and accuracy of order
- Responsiveness to problems
- Quality of products or services received

Whenever a problem is encountered with a vendor, it is important to document the problem, noting the date and a description of the problem. The vendor should be contacted to communicate specifically how the school district wants the problem corrected. The district should keep a record of all communications, including the dates and what was discussed. If the problem is not received is not corrected or continues, written notification stating the problem, the corrective action required and that the vendor's failure to correct the problem will be considered breach of contract and could result in the cancellation of the contract, should be given to the vendor.

Should a situation arise with a vendor, their service or product – the Vendor Comment form (posted on the PISD Intranet page) is completed and forwarded to the Purchasing Office or the office is contacted directly.

## **Vendor Inquiries**

Throughout the year, the District is contacted by several means in regard to vendors being added to the current vendor list. Vendors are referred to the PISD Purchasing webpage where they will find “Bid Process” link. To participate in the Plano ISD bidding process, all vendors are required to log into our e-bidding site and register as a supplier/vendor. Once completed, the vendor will be notified via e-mail of upcoming bids in their particular areas of interest. The website to our e-bidding system is: <https://pisd.ionwave.net>

## **Historically Underutilized Business**

The purchasing office does encourage the participation by historically underutilized businesses (HUB) and disadvantaged/minority/women business enterprises for purchases and provide them opportunities:

- To have access to procedures for quotations and purchase order; competitive biddings, competitive sealed proposals; and all other procurement methods, including the interlocal contracting method and cooperative purchasing; and
- To compete for contracts for provisions of professional services, purchases of equipment and supplies, and provision of other goods and services required by the District.

## **Criminal History Background Checks (Senate Bill 9)**

Senate Bill 9 requires fingerprint-based criminal background reviews for certain school employees/contractors.

A vendor who has or will have (or subcontractors with an individual(s) who has or will have) direct contact with students are required to provide criminal background checks for all such individuals. Vendors are required to provide certification that a criminal background check has been performed for those employees, and are responsible for the cost the criminal background check.

## **Open Records Request**

The Purchasing office may receive a written request for information under the Texas Public Information Act. The purchasing office may or may not be able to immediately respond to the public information request. As provided by the Texas Public Information Act, Plano ISD will provide the requested information promptly. Depending upon the complexity of the request and volume of other pending requests, this is typically 10 business days. If we are unable to complete the request within 10 business days, the individual submitting the request will be notified of the date we expect to complete the request. If the request includes information believed to be confidential or accepted from release, the district will submit a request for an opinion to the Texas Attorney General to determine whether the requested information may be released or must be withheld.

## **School Property Disposal (Surplus)**

The Superintendent or designee is authorized to declare District materials, equipment, personal property such as vehicles, and supplies to be unnecessary and shall dispose of unnecessary materials, equipment, personal property such as vehicles, and supplies for fair market value. If the unnecessary property has no value, the Superintendent or designee may dispose of such property according to administrative discretion. Instructional materials shall be disposed of in accordance with law. [See CMD(LLEGAL)] Property obtained with federal funds or as federal surplus shall be managed in accordance with federal law.

**EDGAR – Federal Funds**

Contracting entities receiving funds through the United States Department of Education are required to follow the regulations described in the Education Department General Administration Regulations (EDGAR). While there are regulations in EDGAR that conflict with USDA regulations, in most situations contracting entities will find the regulations to be compatible. However, if there is a regulatory conflict, contracting entities are required to follow the USDA regulations for all Child Nutrition Program funds, including procurement.

**Purchasing Thresholds Involving Federal Funds**

PLANO ISD PURCHASING LEVELS AND REQUIREMENTS				
FEDERAL FUNDS				
VENDOR	SUPPORT NEEDED	ADDITIONAL FORMS	RFP	BOARD APPROVAL
<b>UP TO \$49,999</b>				
<b><i>Awarded <u>Plano ISD</u> Vendor</i></b>	3 Quotes	Purchasing will have Bid Documents	Completed by Purchasing	Previously Approved
<b><i>Awarded <u>Cooperative</u> Vendor</i></b> (example-Buyboard, TIPS, area school district, etc.)	3 Quotes	Purchasing will gather Cooperative Bid documents	Completed by Cooperative and Confirmed by Purchasing	Not Required
<b><i>Non-Awarded Vendor</i></b>	Contact Purchasing First If Approved by Purchasing, 3 Quotes	If Approved by Purchasing, Inwave New Vendor Application	Not Required	Not Required
<b>BETWEEN \$50,000 TO \$249,999</b>				
<b><i>Awarded <u>Plano ISD</u> Vendor</i></b>	3 Quotes	Purchasing will have Bid Documents	Completed by Purchasing	Previously Approved
<b><i>Awarded <u>Cooperative</u> Vendor</i></b> (example-Buyboard, TIPS, area school district, etc.)	3 Quotes	Purchasing will gather Cooperative Bid documents	Completed by Cooperative and Confirmed by Purchasing	<b>REQUIRED</b>
<b><i>Non-Awarded Vendor</i></b>	Formal Bid is Required	Specifications for Bid	<b>REQUIRED</b>	<b>REQUIRED</b>
<b>\$250,000 and OVER</b>				
<b><i>Awarded <u>Plano ISD</u> or <u>Cooperative</u> Vendor</i></b>	<b>REQUIRED:</b> A. Complete Independent Estimate Determination Form <b>PRIOR</b> to quotes received or bid being issued B. Complete Price/Cost Analysis Form C. 3 QUOTES	Purchasing will gather Plano ISD Bid or Cooperative Bid Documents	Completed by Plano ISD or Cooperative and Confirmed by Purchasing	<b>REQUIRED</b> for Cooperative Purchase
<b><i>Non-Awarded Vendor</i></b>	<b>REQUIRED:</b> A. Complete Independent Estimate Determination Form <b>PRIOR</b> to quotes received or bid being issued B. Complete Price/Cost Analysis Form	Specifications for Bid	<b>REQUIRED</b>	<b>REQUIRED</b>
	<a href="#">Link to: Independent Estimate Form</a>	<a href="#">Link to: Price/Cost Analysis Form</a>		

## Construction – Federal Funds

Approved construction and renovation projects must comply with applicable Uniform Guidance requirements, as well as USDE’s regulations regarding construction under 34 CFR § 76.600. As is the case with all remodeling or construction contracts using laborers and mechanics financed by federal education funds, an LEA that uses ESSER funds for minor remodeling, renovation, repair, or construction contracts over \$2,000 must meet all Davis-Bacon Act prevailing wage requirements and include language in the contracts that all contractors or subcontractors must pay wages that are not less than those established for the locality of the project (prevailing wage rates).

The broad ESSA Impact Aid definition of “construction” includes new construction as well as remodeling, alterations, renovations, and repairs under which many activities related to COVID-19 would likely fall (see June 21, 2021, clarification below). However, USDE discourages LEAs from using ESSER funds for new construction because this use of funds may limit an LEA’s ability to support other essential needs or initiatives. Remodeling, renovation, and new construction are often time-consuming, which may not be workable under the shorter timelines associated with ESSER and GEER funds. These types of activities are also subject to a number of additional federal requirements, as detailed below.

The Impact Aid program statute defines “construction” as “(A) the preparation of drawings and specifications for school facilities; (B) erecting, building, acquiring, altering, remodeling, repairing, or extending school facilities; (C) inspecting and supervising the construction of school facilities; and (D) debt service for such activities.” While construction is generally allowable, it is the responsibility of the LEA to assure that individual costs:

- 1) comply with the Cost Principles in 2 CFR Part 200, subpart E (e.g., the cost must be “necessary and reasonable” (2 CFR §§ 200.403-200.404));
- 2) meet the overall purpose of the CARES Act, CRRSA Act, or ARP Act programs, which is “to prevent, prepare for, and respond to COVID-19”; and
- 3) are consistent with the proper and efficient administration of those programs.

Under these general principles, any construction activities, including renovations or remodeling, that are necessary for an LEA to prevent, prepare for, and respond to COVID-19 could be permissible, though the burden remains on grantees and subgrantees to maintain the appropriate documentation that supports the expenditure.

As noted above, an LEA using ESSER funds for remodeling, renovation, and new construction must comply with additional federal requirements. For example, these projects require prior written approval by TEA. Approved construction projects (i.e., remodeling, renovation, and new construction) also must comply with applicable Uniform Guidance requirements, Davis-Bacon Act prevailing wage requirements, and all of the Department’s applicable regulations regarding construction at 34 CFR §§ 76.600 and 75.600-75.618. Some of the relevant requirements that must be considered before a new construction project is initiated include:

- 1) Has the grantee completed an environmental impact assessment before initiating the construction and fully considered any potential environmental ramifications before proceeding with the project (34 CFR § 75.601);
- 2) Has the grantee considered the probable effects of proposed construction on any district, site, building, or structure that is included or eligible for inclusion in the National Register of Historic Places (34 CFR § 75.602)
- 3) Does the grantee have title or other interest in the site, including right of access, that is sufficient to ensure that the grantee will have use and possession of the facility for 50 years or the useful life of the facility, whichever is longer (34 CFR § 75.603);
- 4) Can the grantee begin the approved construction in a reasonable time period and have the final plans been approved before the construction is advertised or placed on the market for bidding (34 CFR § 75.605);
- 5) Can a grantee complete the project in a reasonable time period and consistent with the approved plans and specifications (34 CFR § 75.606);
- 6) Is the construction functional, economical, and not elaborate in design or extravagant in the use of

materials as compared to other facilities in the State or other applicable geographic area (34 CFR § 75.607);

7) Do the grantee's plans and designs for the facilities comply with applicable Federal, State and local health and safety standards, as well as Federal requirements regarding access by persons with disabilities. (34 CFR §§75.609 and 75.610); and

8) Does the grantee have sufficient operational funds to operate and maintain the facility once the construction is complete and will the grantee operate and maintain the facility in accordance with all applicable Federal, State, and local requirements (34 CFR §§ 75.614 and 75.615).

As of 12/19/2022, this form will be submitted via the EDGAR 2.0 WorkApp.

<https://workapps.smartsheet.com/app/PV3M9RP4vpVhGfqXm9Cwc9qGR3/7QRHJfFGf34Gq>

ESSER funds may be used to make necessary improvements, for example to improve air quality and support social distancing, so that teachers and students may safely return to and continue in-person instruction. As is the case with all activities charged to ESSER, costs must be reasonable and necessary to meet the overall purpose of the program, which is "to prevent, prepare for, and respond to COVID-19". Therefore, renovation or remodeling activities that are necessary for an LEA to prevent, prepare for, and respond to COVID-19 would be permissible. This might include the inspection, testing, maintenance, repair, replacement, and upgrade projects to improve the indoor air quality in school facilities, including mechanical and non-mechanical heating, ventilation, and air conditioning systems, filtering, purification and other air cleaning, fans, control systems, and window and door repair and replacement.

These projects may (see June 21, 2021, clarification below) also be subject to prior written approval by TEA and applicable Uniform Guidance requirements, Davis-Bacon Act prevailing wage requirements and all of USDE's applicable regulations regarding construction under 34 CFR §§ 76.600 and 75.600-75.618. To request prior approval from TEA, complete and submit the ARP Construction Pre-Approval Request form. In implementing any allowable ESSER activity, a subgrantee must follow all applicable federal, state, and local standards and policies (e.g., building codes or specifications for HVAC systems, which may be consistent with standards identified by the EPA, CDC, or World Health Organization). If an LEA uses funds for HVAC systems, USDE's regulation in 34 CFR § 75.616(c) requires the use of American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) standards. The LEA might also consider using ESSER funds to establish a program for assessing and improving HVAC systems. Such a program could also require verification that proper ventilation is occurring, such as through the use of carbon dioxide (CO<sub>2</sub>) monitors. Please note that the Environmental Protection Agency (EPA) has a variety of publications that can assist education leaders in improving the indoor air quality in schools. EPA resources on indoor air quality in schools can be accessed at: <https://www.epa.gov/iaq-schools>. The EPA has information available at: <https://www.epa.gov/coronavirus/air-cleaners-hvac-filters-and-coronavirus-covid-19> on some indoor air filtration devices that use bipolar ionization technology, which has the potential to create ozone. EPA states that ozone generators should not be used in occupied spaces. If choosing to use a device that incorporates bipolar ionization technology, EPA recommends using a device that meets UL 2998 standard certification (Environmental Claim Validation Procedure (ECVP) for Zero Ozone Emissions from Air Cleaners) and notes that there are many air cleaning devices that do not use bipolar ionization. In addition, the CDC provides information on improving ventilation in schools at: <https://www.cdc.gov/coronavirus/2019-ncov/community/schools-childcare/ventilation.html> and in buildings at:

<https://www.cdc.gov/coronavirus/2019-ncov/community/ventilation.html>.

On June 21, 2021, USDE further clarified their FAQ regarding Construction and HVAC activities:

- TEA has the authority to define its own reasonable prior approval process required for construction, including HVAC projects, that require prior approval.
- Some HVAC projects may constitute "minor remodeling" and not be considered as construction projects requiring prior approval. Minor remodeling means minor alterations in a previously completed building for purposes associated with the coronavirus. The term also includes the extension of utility lines, such as water and electricity, from points beyond the confines of the space in which the minor remodeling is undertaken but within the confines of the previously completed building. The term does not include permanent building construction, structural alterations to buildings, building maintenance, or repairs. However, minor remodeling projects that constitute capital assets under the Uniform Guidance still require prior approval consistent with 2 CFR §200.439.

- TEA prior approval is not required before LEA bidding is advertised under applicable requirements.
- TEA approval can come at any point in the project timeline until reimbursement using ARP ESSER funds occurs.
- The provisions of the National Environmental Policy Act (NEPA) do not apply to construction projects funded with ESSER funds.

Therefore, TEA will require the prior approval request to be submitted before the grant application (either in the original application or an amendment containing the construction cost) is approved but will not require the prior approval request to be approved by TEA before the bid process begins or the work may have begun during the pre-award period.

Since it is an allowable activity, TEA will provide prior approval and allow ESSER funds to be used for construction.

However, the LEA is accepting multiple risks in using federal funds for construction. There is risk of future audit findings related to whether the LEA appropriately meets all the federal requirements imposed on construction projects, and there is risk in the construction project not being completed by the end of the ESSER funding period and the LEA not being able to appropriately expend the ESSER funds that had been appropriated for the construction project on short notice.

Any allowable use of funds to be charged to the ESSER grant must be reasonable and necessary, the LEA must justify the use of funds meets the intent of the ESSER statute (which is to prevent, prepare for, or respond to the COVID-19 pandemic, including its impact on the social, emotional, mental health, and academic needs of students), and the LEA must align it to an allowable activity in the statute. USDE has clarified that ESSER I, ESSER II, and ESSER III grants may be expended for any allowable activity codified under statute in ESSER I, II, or III; making the allowable activities interchangeable among the activities that are listed in Section 18003(d) of the CARES Act, Section 313(d) of the CRRSA Act, and Section 2001(e) of the ARP Act.

In determining how to prioritize its funds, an LEA should consider how to use those funds to safely reopen schools for full-time instruction for all students, maintain safe in-person operations, advance educational equity, and build capacity. An LEA may provide services directly or enter into an agreement (e.g., a contract or interagency agreement consistent with procurement requirements or otherwise legally authorized) for allowable activities under ESSER. An LEA is not authorized to award subgrants with ESSER funds. contract or interagency agreement consistent with procurement requirements or otherwise legally authorized) for allowable activities under ESSER. An LEA is not authorized to award subgrants with ESSER funds.

Note that all renovation, including minor remodeling, HVAC, and air quality projects are considered construction by USDE and must have TEA prior approval as described above.

Per USDE guidance, LEAs may use ESSER I, ESSER II, and ESSER III grants for any of the following allowable uses.

TEA ESSER FAQs related to the use of ESSER funds to remodel restrooms to include installation of touch free toilets and sinks states that: *The remodeling costs associated with CDC health and safety recommendations could be allowable. Any other renovations charged to ESSER funds must meet the intent and purpose of the statute. Remember prior approval is required for all construction, renovation and remodeling projects.*

Other potential allowable projects may include the following is pre-approval and well documented:

- Construction of cell towers to provide WiFi access to students throughout the district
- Playground equipment to promote social distancing
- Expansion of instructional space

#### Grant Application Process:

Prior to submitting the ESSER grant application with construction costs, the Director of State Federal Programs shall prepare and submit the Pre-Approval for Construction, Remodeling, Alteration, Renovation or Repair Costs form through TEA's EDGAR WorkApps smartsheet. All renovations and repairs that require pre-approval include HVAC, ventilation and air quality costs. As of 12/19/2022, this form will be submitted via the [EDGAR 2.0 WorkApp](#).

The Director of Maintenance shall work collaboratively with the federal grant manager to ensure that all

EDGAR regulations related to construction are adhered.

The grant application shall include pre-approved construction costs in the 6600 object code class. *According to the TEA ESSER FAQs, the ESSER prior approval for a construction project would include the services of the professional engineer if it is part of the HVAC project that is being submitted for review and approval.*

Budgeting ESSER Grant Funds:

After securing the pre-approval from TEA, the Director of State and Federal Programs and Grant accountant shall ensure that the construction costs are budgeted in the correct object code class as authorized by Financial Accountability System Resource Guide, or the granting agency, as appropriate.

According to TEA's ESSER FAQs, construction costs must be budgeted in function 81 and not function 71 (debt).

Period of Performance (Obligations)

The district shall ensure that the period of performance for the ESSER grant funds matches both the NOGA grant period and the specific quarters/fiscal years as noted on the grant application. The Accountant shall be responsible to oversee that all costs for ESSER grants are in compliance with both requirements.

**The construction project manager shall be informed of the grant start and end dates.**

Procurement Standards and Expenditures of Grant Funds

The district shall utilize either the [ESSER Justification/Documentation of Allowable Users of ESSER Funds](#) or a local similar form to document all ESSER grant fund expenditures. The district's purchasing procedures shall be utilized for all ESSER grant fund purchases.

In addition to compliance with EDGAR provisions related to construction, the district shall adhere to all state laws, local policies and procedures related to the procurement of construction.

In accordance with 2 CFR 200.319(d)(1)(2), the district shall ensure that the follow procurement requirements are included in all procurement specifications:

- The specifications shall provide a clear and accurate description of the technical requirements as they relate to the material, product and/or service to be provided
- The description of the project does not unduly restrict competition
- All requirements and other factors and their relative weights to be used when evaluating the bids and proposals are identified in the specifications
- Prohibition of prospective contractor's involvement in the development of the specifications, bid documents and contracts

In accordance with 2 CFR 200.320 (b)(2), the district shall adhere to the following process to conduct technical evaluations of proposals received and the selection of the awarded contract.

- Evaluation criteria shall be included in the specifications, to include the weights of all criteria
- A team approach shall be used to obtain at least 3 individuals to review and rank the proposals/bids
- Review of proposal/bid by each member of the review team and determination of the total points based on the criteria and weights
- Aggregation of the individual ranking to determine the team ranking
- The contract shall be awarded to the responsible offeror whose proposal/bid is the most advantageous to the district with price and other factors considered
- Awards for professional services such as architects and engineers shall be based on the offeror's qualifications and an award made subject to negotiation of fair and reasonable fees.

The Project Manager with support of the finance office shall lead the evaluation team process. The Project Manager with support of the finance office shall also ensure that no conflict of interest exists with any of the evaluation team members involved in the review and selection of the vendor.

### Davis Bacon Act:

*According to TEA's ESSER FAQs: The LEA must maintain sufficient source documentation to show compliance with the Davis-Bacon Act requirement such as certified payrolls.*

All construction procurement documents must be in compliance with the Davis Bacon Act. Documentation must be maintained the support compliance with Davis Bacon Act during the procurement process.

Documentation may include:

- Prevailing wages documentation in the construction specifications
- Davis Bacon Act job site posting requirements
- Weekly payroll reports with every project drawdown (AIA reports)

In addition, the Domestic Preference for Procurement (commonly referenced as Buy America) should be included in all subcontracts and purchase orders.

### Use of Design-Build Delivery Method

*According to the TEA ESSER FAQs: Since this process is consistent with state procurement requirements, we default to federal thresholds in determining compliance with federal procurement. Accordingly, if the overall contract is under \$250,000, then it is likely that the design build process could meet the informal federal procurement requirements, as it only requires two quotes in support of the reasonableness of the award and the process solicits budget information from potential vendors.*

*If the overall contract exceeds \$250,000, then to meet federal procurement requirements the district would need to comply with 2 CFR §200.320(b). Generally, sealed bids are preferred for construction contracts (200.320(b)(1)), but here, if the resulting agreement is cost-reimbursement, it would require the open proposal process in 2 CFR §200.320(b)(2). In either circumstance, price must be used as a selection factor (only architect/engineer professional services can be procured based only on qualifications, with price negotiated afterwards). And of course, the federal terms and conditions must be included, such as Davis Bacon, etc. But assuming the design-build process does not rely only on qualifications, but uses price information to select the winning proposal, then the process should meet federal requirements.*

*LEAs who may have utilized design-build without pricing information prior to this guidance should contact the Department of Grant Compliance and Administration at [GrantSupport@tea.texas.gov](mailto:GrantSupport@tea.texas.gov).*

*According to 36.209, the grantee would need to obtain approval from TEA. 36.209 Construction contracts with architect-engineer firms. No contract for the construction of a project shall be awarded to the firm that designed the project or its subsidiaries or affiliates, except with the approval of the head of the agency or authorized representative. Subpart 36.3 – Two-Phase Design-Build Selection Procedures.*

*Please refer to AU-Q142 for further information.*

### Use of Manager at Risk Method

*Under the manager at risk method. The owner chooses the construction manager. Prior to the bid stage. The district should competitively procure the manager. The grantee can make a case of sole source. It would a be a noncompetitive procurement under a failed subcontractor, then the methods for noncompetitive would apply 2 CFR 200.320(c)*

### Property Standards and Management

All assets purchased with ESSER grant funds shall be added to the district's asset inventory records in compliance with EDGAR. The funding source, such as ESSER I, II or III shall be part of the asset records. The ESSER-funded assets shall be labeled with federal grant program. The district may purchase assets with ESSER grant funds. Assets purchased with ESSER federal grant funds will be subject to the EDGAR Property Standards, including the inventory requirements.

### Cost Principles – Allowable Costs

Although there is great flexibility with the use of the ESSER grant funds, the district shall ensure that all grant expenditures are allowable under the Federal Cost Principles (2 CFR 200 – Subpart E), the grant application program assurances, the granting agency’s policies, and the district policies and procedures. Specifically, the allowable costs shall be in compliance with the ESSER grant application and the statutorily allowed activities.

Before payment is made for construction projects, the District Project Manager shall verify that all required documentation such as certified payroll is reviewed and approved to support construction costs. The Accountant and CFO shall ensure that all costs reclassified to an ESSER grant fund meet all grant award and EDGAR regulations.

The District Project Manager shall complete and submit a Davis Bacon Act Certification form with every AIA payment request form to the Accounts Payable department.

### Contract Monitoring

The District Project Manager shall be responsible to monitor and maintain oversight of all construction projects funded with federal grant funds. The District Project Manager shall oversee that the contractors perform in accordance with the terms, conditions, and specifications of their contracts and purchase orders.

The construction performance review shall include performing onsite technical inspections and completion of certified percentage data reports such as work completed, materials stored, etc.

The District Project Manager shall also verify that all billed work has been completed before a payment is made to the vendor and that the invoice (AIA payment form) contains all required documentation such as the certified payrolls.

If School Board or governing authority approval of payment forms is required, the District Project Manager shall ensure that all approvals are secured before contractor payments are approved.

### Compliance Procedures

In order to be held in compliance and satisfy this federal requirement, entities will need to do the following:

1. Wage Determinations - U.S. Department of Labor (DOL) wage determination must be included in the bidding and contract documents. DOL wage determinations may be obtained online at <https://sam.gov/content/wage-determinations>. Once it is determined that Davis-Bacon wage rates will apply to a construction contract, the subrecipient’s contracting organization must state in the solicitation that Davis-Bacon prevailing wage rates are applicable and bid packages must include the current Davis-Bacon general wage determination for the area where construction will occur. While the solicitation remains open, the subrecipient must monitor <https://sam.gov/content/wage-determinations> on a weekly basis to ensure that the wage determination contained in the solicitation remains current. The subrecipients must amend the solicitation if the DOL issues a modification more than 10 days prior to the closing date (i.e. bid opening) for the solicitation. If DOL modifies or supersedes the applicable wage determination less than 10 days prior to the closing date, the subrecipient may request a finding from TWDB that there is not a reasonable time to notify interested contractors of the modification of the wage determination.
2. Insert wage rate requirements in full for all contracts and subcontracts in excess of \$2,000  
- If the subrecipient is a governmental entity such as a city or district, it must insert in full the contract clauses found in Appendix 1, Section 3, Section 4 if the contract exceeds \$100,000, and Section 5. If the subrecipient is a non-governmental entity such as a water supply corporation or a private company, it must insert in full the contract clauses found in Appendix 2, Section 3, Section 4 if the contract exceeds \$100,000, and Section 5. The subrecipient must ensure all prime contracts require the **same full text in any subcontracts.**

3. Monthly Certification - A Monthly Davis Bacon Wage Rate Certificate of Compliance must be completed by the subrecipient of the SRF funding and submitted monthly to TWDB once construction has begun. (See Monthly Davis Bacon Wage Rate Certificate of Compliance Submittal by Owner (Subrecipient) DB-0154).

4. Contractor Payroll Requirements - The contractor is required to pay the prevailing wage rates on a weekly basis to laborers and mechanics in accordance with the requirements of 29 CFR 5.5, which are incorporated into the actual construction contract. Contractors/ subcontractors must furnish weekly a statement with respect to the wages paid to each employee during the preceding week. They may use the Department of Labor (DOL) Payroll Form WH- 347 and weekly Statement of Compliance on the reverse, or their own payroll form with all of the same data elements as the DOL Payroll Form WH-347, and the TWDB's form, Statement of Compliance Certification by Contractor for SRF, DB-0155. The DOL Payroll Form WH-347 can be found under the forms section of this document or at the following link: <http://www.dol.gov/whd/programs/dbra/wh347.htm>. (See DOL Payroll Form WH-347)

5. Interviews - The subrecipient must periodically interview a sufficient number of employees entitled to the Davis-Bacon prevailing wages to verify that contractors or subcontractors are paying the appropriate wage rates. All interviews must be conducted in confidence. The subrecipient must use Standard Form 1445 (SF 1445) found in the forms section or equivalent documentation to memorialize the interviews. The subrecipient must establish and follow an interview schedule based on its assessment of the risks of noncompliance with Davis-Bacon posed by contractors or subcontractors and the duration of the contract or subcontract. Subrecipients must conduct more frequent interviews if the initial interviews or other information indicated that there is a risk that the contractor or subcontractor is not complying with Davis-Bacon. Subrecipients must immediately conduct interviews in response to an alleged violation of the prevailing wage requirements. (See Section 5 of Appendix 1 and 2)

6. Payroll Records - Certified payroll records are required to be retained by the subrecipient and contractor for three years after completion of the construction project. The subrecipient must periodically conduct spot checks of a representative sample of weekly payroll data to verify that contractors or subcontractors are paying the appropriate wage rates. (See Section 5 of Appendix 1 and 2)

7. Wage Rate Poster - Post the required Poster (WH-1321) and applicable wage rates at the construction site. The wage rate poster may be found at under the forms section of this document or at <http://www.dol.gov/whd/programs/dbra/wh1321.htm>. (See Davis-Bacon Wage Rate Poster, WH-1321)

Report Violations - Subrecipients must immediately report violations of the Davis-Bacon prevailing wage requirements to the EPA Davis-Bacon Coordinator listed in the assistance agreement and to the appropriate DOL WHD Office listed at <http://www.dol.gov/whd/america2.htm>.

#### Davis-Bacon General Wage Determinations

A "wage determination" is the listing of wage and fringe benefit for each classification of laborers and mechanics which the Administrator of the Wage and Hour Division of the U.S. DOL has determined to be prevailing in a given area for a particular type of construction. The Davis-Bacon Wage Determinations are classified by the nature of the construction projects performed, specifically listed as "schedules": residential, building, highway, and heavy construction. A brief outline of the definitions for each schedule is listed below.

#### Construction Type: Heavy determination

This determination includes those projects that are not properly classified as either "building," "highway," or "residential." Unlike these classifications, heavy construction is not a homogenous classification. Because of this catch-all nature, projects within the heavy classification may sometimes be distinguished on the basis of their particular project characteristics, and separate schedules may be issued for dredging projects, water and sewer line projects, dams, major bridges, and flood control projects.

**Construction Type: Highway determination**

This determination includes construction, alteration or repair of roads, streets, highways, runways, taxiways, alleys, trails, paths, parking areas, and other similar projects not incidental to building or heavy construction.

**Construction Type: Building determination**

This determination includes the construction, alteration or repair of single-family houses, apartment buildings of no more than four stories in height. This includes all incidental items such as site work, parking areas, utilities, streets, and sidewalks.

Entities should review their contractor's wage decisions and confirm they provide an adequate classification of the labor required for the specific construction contract. Most CWSRF and DWSRF projects will fall under the "Heavy" construction type, but entities should ask their consulting engineers if unsure. Some contracts or projects may require more than one general schedule to be included depending on the nature and extent of the work (i.e. a building is constructed in a water treatment facility). This is described in more detail in DOL's All Agency Memorandum 130 with Addendum 131. See the DOL's website <http://www.dol.gov/whd/programs/dbra/memorand.htm>. In such cases, the contracting agency should designate the work to which each wage determination or part thereof applies per FAR 22.404-2 thru 404-3 (Federal Acquisition Regulations). Should overlaps occur in the wage classification schedules for the contract(s), the owner may consider adopting the higher rate classification.

<https://www.acquisition.gov/browse/index/far>

In all cases, the entity is responsible to insure an adequate classification is provided to insure compliance with the law. Where contractors alert the owner that the classification is inadequate, the owner should work with the contractor and the DOL to address any valid concerns. See the Contact Information below for additional resources.

# WORKER RIGHTS

## UNDER THE DAVIS-BACON ACT

### FOR LABORERS AND MECHANICS WORKING ON FEDERAL OR FEDERALLY ASSISTED CONSTRUCTION PROJECTS

The law requires employers to display this poster where employees can readily see it.

#### PREVAILING WAGES

You must be paid not less than the wage rate listed in the Davis-Bacon Wage Decision posted with this Notice for the work you perform.

#### OVERTIME

You must be paid not less than one and one-half times your basic rate of pay for all hours worked over 40 in a work week. There are few exceptions.

#### ENFORCEMENT

Contract payments can be withheld to ensure workers receive wages and overtime pay due, and liquidated damages may apply if overtime pay requirements are not met. Davis-Bacon contract clauses allow contract termination and debarment of contractors from future federal contracts for three years. A contractor who falsifies certified payroll records or induces wage kickbacks may be subject to civil or criminal prosecution, fines and/or imprisonment.

#### APPRENTICES

Apprentice rates apply only to apprentices properly registered under approved Federal or State apprenticeship programs.

#### RETALIATION

The law prohibits discharging or otherwise retaliating against workers for filing a complaint, cooperating in an investigation, or testifying in a proceeding under the Davis-Bacon and Related Acts.

#### PROPER PAY

If you do not receive proper pay, or require further information on the applicable wages, contact the Contracting Officer listed below:

or contact the U.S. Department of Labor's Wage and Hour Division.



WAGE AND HOUR DIVISION  
UNITED STATES DEPARTMENT OF LABOR

1-866-487-9243  
TTY: 1-877-889-5827  
[www.dol.gov/whd](http://www.dol.gov/whd)



WH1381 REV 10/17



Date \_\_\_\_\_

I, \_\_\_\_\_ (Name of Signatory Party) \_\_\_\_\_ (Title)

do hereby state:

(1) That I pay or supervise the payment of the persons employed by

\_\_\_\_\_ (Contractor or Subcontractor) on the

\_\_\_\_\_ (Building or Work); that during the payroll period commencing on the

\_\_\_\_\_ day of \_\_\_\_\_, and ending the \_\_\_\_\_ day of \_\_\_\_\_,

all persons employed on said project have been paid the full weekly wages earned, that no rebates have been or will be made either directly or indirectly to or on behalf of said

\_\_\_\_\_ from the full (Contractor or Subcontractor)

weekly wages earned by any person and that no deductions have been made either directly or indirectly from the full wages earned by any person, other than permissible deductions as defined in Regulations, Part 3 (29 C.F.R. Subtitle A), issued by the Secretary of Labor under the Copeland Act, as amended (48 Stat. 948, 63 Stat. 108, 72 Stat. 967; 76 Stat. 357; 40 U.S.C. § 3145), and described below:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(2) That any payrolls otherwise under this contract required to be submitted for the above period are correct and complete; that the wage rates for laborers or mechanics contained therein are not less than the applicable wage rates contained in any wage determination incorporated into the contract; that the classifications set forth therein for each laborer or mechanic conform with the work he performed.

(3) That any apprentices employed in the above period are duly registered in a bona fide apprenticeship program registered with a State apprenticeship agency recognized by the Bureau of Apprenticeship and Training, United States Department of Labor, or if no such recognized agency exists in a State, are registered with the Bureau of Apprenticeship and Training, United States Department of Labor.

(4) That:

(a) WHERE FRINGE BENEFITS ARE PAID TO APPROVED PLANS, FUNDS, OR PROGRAMS

- in addition to the basic hourly wage rates paid to each laborer or mechanic listed in the above referenced payroll, payments of fringe benefits as listed in the contract have been or will be made to appropriate programs for the benefit of such employees, except as noted in section 4(c) below.

(b) WHERE FRINGE BENEFITS ARE PAID IN CASH

- Each laborer or mechanic listed in the above referenced payroll has been paid, as indicated on the payroll, an amount not less than the sum of the applicable basic hourly wage rate plus the amount of the required fringe benefits as listed in the contract, except as noted in section 4(c) below.

(c) EXCEPTIONS

EXCEPTION (CRAFT)	EXPLANATION

REMARKS:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

NAME AND TITLE

SIGNATURE

THE WILLFUL FALSIFICATION OF ANY OF THE ABOVE STATEMENTS MAY SUBJECT THE CONTRACTOR OR SUBCONTRACTOR TO CIVIL OR CRIMINAL PROSECUTION. SEE SECTION 1001 OF TITLE 18 AND SECTION 3729 OF TITLE 31 OF THE UNITED STATES CODE.

## LABOR STANDARDS INTERVIEW

CONTRACT NUMBER		EMPLOYEE INFORMATION		
NAME OF PRIME CONTRACTOR		LAST NAME	FIRST NAME	MI
NAME OF EMPLOYER		STREET ADDRESS		
SUPERVISOR'S NAME		CITY	STATE	ZIP CODE
LAST NAME	FIRST NAME	MI	WORK CLASSIFICATION	WAGE RATE

ACTION	CHECK BELOW	
	YES	NO
Do you work over 8 hours per day?	<input type="checkbox"/>	<input type="checkbox"/>
Do you work over 40 hours per week?	<input type="checkbox"/>	<input type="checkbox"/>
Are you paid at least time and a half for overtime hours?	<input type="checkbox"/>	<input type="checkbox"/>
Are you receiving any cash payments for fringe benefits required by the posted wage determination decision?	<input type="checkbox"/>	<input type="checkbox"/>

WHAT DEDUCTIONS OTHER THAN TAXES AND SOCIAL SECURITY ARE MADE FROM YOUR PAY?  
 \_\_\_\_\_

HOW MANY HOURS DID YOU WORK ON YOUR LAST WORK DAY BEFORE THIS INTERVIEW?	TOOLS YOU USE	
DATE OF LAST WORK DAY BEFORE INTERVIEW (YYMMDD)		
DATE YOU BEGAN WORK ON THIS PROJECT (YYMMDD)		

THE ABOVE IS CORRECT TO THE BEST OF MY KNOWLEDGE

EMPLOYEE'S SIGNATURE		DATE (YYMMDD)
INTERVIEWER	SIGNATURE	TYPED OR PRINTED NAME
		DATE (YYMMDD)

INTERVIEWER'S COMMENTS			
WORK EMPLOYEE WAS DOING WHEN INTERVIEWED	ACTION <i>(If explanation is needed, use comments section)</i>	YES	NO
	IS EMPLOYEE PROPERLY CLASSIFIED AND PAID?	<input type="checkbox"/>	<input type="checkbox"/>
	ARE WAGE RATES AND POSTERS DISPLAYED?	<input type="checkbox"/>	<input type="checkbox"/>

**FOR USE BY PAYROLL CHECKER**

IS ABOVE INFORMATION IN AGREEMENT WITH PAYROLL DATA?  
 YES       NO

COMMENTS

CHECKER			
LAST NAME	FIRST NAME	MI	JOB TITLE
SIGNATURE			DATE (YYMMDD)

**PLANO INDEPENDENT SCHOOL DISTRICT**

# PURCHASING



# MANUAL

