

## 2112 PROCUREMENT OF GOODS AND SERVICES AND NEGOTIATION OF SUBAWARDS

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Effective: December 1986  
Last Reviewed: May 2017  
Last Revised: May 2017  
Responsible Office: Research Services  
Approval: Research Services

### PURPOSE

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To establish responsibility for the procurement of goods and services and the establishment of subaward agreements with sponsored project funds.

### POLICY

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1. Research Services, the Office of Clinical Research, and Penn Center for Innovation, in consultation with other University Offices as appropriate, are responsible for the negotiation, preparation and administration of subawards where a material portion of the scope of work or supported activity is to be accomplished by another institution or organization.
2. The University of Pennsylvania elects to utilize the grace period for compliance with the procurement standards under OMB Uniform Guidance Part 200.320.
3. Goods and services funded by sponsored projects shall be acquired in accordance with established University policy as set forth in Section 2300 of the Financial Policy Manual, the Sponsored Projects Handbook, and any additional restrictions imposed by the sponsor. Agreements for purchasing of standard products and services may be referred to Penn Purchasing for handling.
4. Effective July 1, 2018 (FY2019), procurement of goods and services on Federal awards must be made in compliance with the OMB Uniform Guidance Part 200.320. In order to comply with this requirement, goods and services valued between \$3500 and \$5000 should be procured from a contracted Penn Marketplace supplier. If a non-contract vendor is chosen for the procurement, then documentation of at least two vendor prices for the goods or services must be retained.

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### ROLES AND RESPONSIBILITIES

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#### OFFICE OF CLINICAL RESEARCH:

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- Negotiates and prepares subawards for clinical trials funded by industry sponsors where a material portion of the scope of work or supported activity is to be accomplished at another institution or organization

**CENTER FOR TECHNOLOGY TRANSFER:**

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- **Negotiates and prepares subawards for Industry Sponsored Research activities other than clinical trials where a material portion of the scope of work or supported activity is to be accomplished at another institution or organization**

**OFFICE OF RESEARCH SERVICES:**

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- **Negotiates and prepares subawards for Government and nonprofit foundation funded research activities where a material portion of the scope of work or supported activity is to be accomplished at another institution or organization.**