



Purchasing Policy for Sponsored Research

Effective Date: September 1984

Approval: January 8, 2015;
University President

Maintenance of Policy: University
of Dayton Research Institute
Purchasing Manager

PURPOSE: This policy ensures the prudent expenditure of funds and requires all employees who authorize such expenditures to exercise good judgment regardless of the source of funds.

SCOPE: This policy applies to the University of Dayton's college, schools, departments, and Research Institute conducting sponsored research.

POLICY:

The University considers the prudent expenditure of funds to be an important responsibility and requires all employees having such authority to exercise good judgment in authorizing such expenditures, regardless of the source of the funds. Expenditures under this policy will be in compliance with all applicable regulations, including the Anti-Kickback Act of 1986 (Title 41 U.S. Code 51-58), Federal Acquisition Regulations (FAR) 52.2198-8 Utilization of Small Business Concerns (JUL 2013), FAR 31.104 and 31.3 Contracts with Educational Institutions and Office of Management and Budget (OMB) A-21, Cost Principles for Educational Institutions. Expenditures will also be in compliance with the requirements of ISO 9001:3000 related to the purchasing function.

The Anti-Kickback Act of 1986 (Title 41 U.S. Code 51-58) prohibits any person from providing or accepting kickbacks. A kickback is money or anything of value which is provided for the purpose of improperly obtaining or rewarding favorable treatment in connection with a contract. The act imposes criminal penalties on any person who knowingly and willfully engages in prohibited conduct. The act also provides for the recovery of civil penalties by the United States from any person who knowingly engages in such prohibited conduct and from any person whose employee, subcontractor, or subcontractor employee provides, accepts, or charges a kickback. Any such violation should be promptly reported to the Office of Naval Research-Chicago Region at (312) 886-5423.

REFERENCE DOCUMENTS:

1. Policies and Procedures for Purchasing and Subcontracts
2. ISO 9001:3000 Quality Manual

APPLICABLE REGULATIONS:

1. Anti-Kickback Act of 1986 (Title 41 U.S. Code 51-58)
2. Federal Acquisition Regulations (FAR) 52.219-8 Utilization of Small Business Concerns
3. FAR 31.104 and 31.3 Contracts with Educational Institutions
4. Office of Management and Budget (OMB) A-21, Cost Principles for Educational Institutions

POLICY HISTORY:

Approved in its original form:
September 1984 (Title: Purchasing
Policies and Procedures)

Approved as amended: July 2012

Approved as amended: January 8,
2015

POLICY (continued):

It is the policy of the University of Dayton to provide all Small Business concerns – Small (SS), Small-Disadvantaged (SD), Women-Owned Small (SW), Veteran- Owned Small (VO), Service Disabled Veteran-Owned Small (DV), and HUBZone (HUBZONE) certified – the maximum practicable opportunity to participate in the performance of contracts which have been awarded by any federal agency (FAR 52.219-8).

RESPONSIBILITY FOR ENFORCEMENT, REMEDIES, SANCTIONS

The Research Institute Purchasing Office implements and performs the purchasing function for all accounts administered by the Research Institute. The Purchasing Manager is responsible for reviewing and approving changes to the policies and procedures document.