



Administrative Policies

Procurement Policy

POLICY #:	<i>ADM-3001, Rev. 3</i>
EFFECTIVE:	<i>November 12, 2025</i>
SUPERSEDES:	<i>Procurement Policy # ADM-3001, Rev 2, effective July 8, 2025</i>

PURPOSE:

This policy communicates WorkForce Central’s methods for the procurement of goods and services.

The policy was revised to:

- Authorize procurement of services (as opposed to goods) of up to \$25,000 without soliciting quotations, to align with local government procurement policy.
- Separate requirements for informal procurement of “services” and “goods”, including a definition for both.

BACKGROUND:

Applicable federal, state, and local laws and regulations, including the requirements set forth in the Office of Management and Budget (OMB) 2 CFR 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, guide the procurement standards referenced in this policy. When state and local procurement laws and regulations impose stricter requirements than applicable federal standards, state and local requirements will be followed.

POLICY:

Procurement standards must ensure fiscal accountability and prevent waste, fraud, and abuse. Where applicable, standards must support fair, equitable, and competitive procurement of goods and services. WorkForce Central will:

- Ensure full and open competition when necessary.
- Use the most economical and equitable approach to the procurement of goods and services.
- Award only to responsible contractors that possess the ability to perform successfully under the terms and conditions of a proposed contract. Consideration will be given to such matters as:
 - Contractor integrity
 - Compliance with public policy

- Proper classification of employees (see the Fair Labor Standards Act, 29 U.S.C. 201, chapter 8)
- Record of past performance, when applicable. Entities with no previous performance history are encouraged to respond to WorkForce Central competitive procurements.
- Financial and technical resources
- Maintain oversight and monitor contractor performance regarding contract terms, conditions, and specifications.
- Maintain records detailing:
 - The history of the procurement, including rationale for the selected method of procurement
 - Selection of contract type
 - Basis for contractor selection or rejection
 - Basis for contract price
- Maintain a conflict of interest policy that ensures no employee, officer, or agent participates in the selection, award, and administration of a contract if they have a real, perceived, or potential conflict of interest. Conflicts of interest must be disclosed in writing when known in advance or announced to the voting body, when applicable. The party must excuse themselves from any further discussion and/or vote on the matter in question. Violations of such standards are subject to disciplinary actions provided in WorkForce Central's Code of Conduct and Conflict of Interest Policy, located at [WorkForce Central's Policy Library](#).
- Be responsible for settling all contractual and administrative issues arising out of procurement.

A. Competitive Procurement

When competitive procurement is required by this policy, procurement transactions must be conducted in a manner providing full and open competition. To ensure objective contractor performance and eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work or invitations for bids or requests for proposals must be excluded from competing on those procurements.

Except as may be required by the funder, WorkForce Central's competitive procurement procedures will ensure solicitations:

- Incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description must not contain features which unduly restrict competition. Situations considered to be restrictive of competition include, but are not limited to:
 - Placing unreasonable requirements on organizations in order for them to qualify to do business
 - Requiring unnecessary experience or excessive bonding
 - Noncompetitive pricing practices between organizations or between affiliated companies

- Noncompetitive contracts to consultants that are on retainer contracts
- Organizational conflicts of interest
- Specifying only a “brand name” product instead of allowing an “equal” product to be offered and describing the performance or other relevant requirements of the procurement
- Any arbitrary action in the procurement process
- Identify all requirements which the respondents must fulfill.
- Identify factors to be used in evaluating bids or proposals.

WorkForce Central will ensure that any prequalified lists of persons, organizations, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. WorkForce Central will not prevent potential respondents from qualifying during the solicitation period.

The following routine purchases are exempt from competitive procurement: office and space leases, insurance, utilities, interagency service level agreements, payments and fees required by law, renewal of operational or accounting software, associations and memberships, and general office supplies.

B. Methods of Procurement

As a matter of policy, and consistent with applicable state and local regulations, WorkForce Central will use the following procurement methods for goods and services.

1. Informal procurement methods for small purchases

SERVICES: The furnishing of labor, time, or effort to accomplish a specific project, task, or other service.

- a. Micro-purchases of \$1 up to \$25,000: The procurement of services for which the aggregate dollar amount does not exceed \$25,000 may be made without soliciting quotations.
- b. Simplified Acquisition Purchases of \$25,001 up to \$50,000: The procurement of services for which the aggregate dollar amount does not exceed \$50,000 requires a minimum of three (3) informal price quotations obtained via internet search, email, phone call, or other documented method is required. If three quotations are unavailable, documentation of due diligence in attempting to acquire the three quotations is required.

Types of services include:

- Client Services: Services provided directly to clients or participants by WorkForce Central’s contractors or subrecipients.

- **Personal Services:** Involve technical expertise provided by a consultant to accomplish a specific study, project, task, or other work.
- **Purchased Services:** Services provided by vendors for routine, necessary, and continuing functions.
- **Professional Services:** Services requiring special training or education or those that require the practitioner to hold professional degrees or licenses and/or possess specific skills (excludes Architectural and Engineering services).

GOODS: Any tangible item or property such as equipment, supplies, materials, or products and intangible items or properties that are movable, subject to ownership, and have exchange value.

- a. Micro-purchases of \$1 up to \$10,000: The purchase of goods for which the aggregate dollar amount does not exceed \$10,000 may be made without soliciting quotations.
 - b. Simplified Acquisition Purchases of \$10,001 up to \$50,000: The procurement of goods for which the aggregate dollar amount does not exceed \$50,000. A minimum of three (3) informal price quotations obtained via internet search, email, phone call, or other documented method is required. If three quotations are unavailable, documentation of due diligence in attempting to acquire the three quotations is required.
- 2. Formal procurement methods for \$50,001 and above:** Formal procurement methods and cost and price analysis are required. Formal procurement methods for goods and services include:
- a. Sealed Bids (formal advertising): Sealed bids are publicly solicited and a firm fixed price contract (lump sum or unit price) is awarded to the respondent responsible whose bid, conforming with all of the material terms and conditions of the invitation for bids, is the lowest price. The sealed bid method is the preferred method for procuring construction if the conditions in [200.320](#) apply.
 - b. Proposals: In this procurement method, either a fixed price or cost-reimbursement type of contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:
 - Requests for Proposals (RFPs) must be publicized and proposals must be solicited from an adequate number of qualified respondents. Any response to publicized requests for proposals must be considered to the maximum extent practical.
 - Evaluation criteria, their relative importance, and selection method are in the RFP.
 - Contracts must be awarded to the respondent whose proposal is most advantageous to WorkForce Central and our community with price and other factors considered.
 - WorkForce Central may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby respondents' qualifications are evaluated, and the most qualified respondent is selected, subject to

negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E organizations are a potential source to perform the proposed effort.

3. Sole Source Procurement: Competitive procurement may be waived and sole source procurement used only when one or more of the following circumstances apply:

- The acquisition of services, the aggregate dollar amount of which does not exceed the micro-purchase threshold stated in 2 CFR 200.320(a)(1), or lower threshold established by local policy.
- The item or service is available only from a single source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- The awarding agency or pass-through entity expressly authorizes noncompetitive procurement.
- After solicitation of a number of sources, competition is determined inadequate.

C. Subawards Not Requiring Competitive Procurement

WorkForce Central is not required to competitively procure subawards to entities who will perform essential activities of funded programs or services, unless mandated by statute or by the awarding agency (e.g., WIOA Title I, Section D. Procurement Requirements). This includes allowance for WorkForce Central to select providers of WIOA Title I Adult and Dislocated Worker career services and National Dislocated Worker Grant services without competitive procurement.

When competitive procurement is not used to select an entity for a subaward, entity selection must be guided by:

- Documented internal controls, including written procedures for employee conduct and conflict of interest provisions.
- The entity's track record, considering past record of performance, cost principles, record of compliance, and audit and monitoring results.
- Consideration of equitable distribution of funds to small, minority-owned, women-owned and veteran-owned businesses and the entity's ability to effectively provide services to priority populations identified by the funder or by WorkForce Central.

D. Cost and Price Analysis

WorkForce Central will perform a cost or price analysis for every procurement transaction, including contract modifications, in excess of the simplified acquisition threshold of \$50,000. The method and degree of analysis conducted depend on the facts surrounding the particular procurement



transaction. WorkForce Central will make independent estimates before receiving bids or proposals.

Costs or prices based on estimated costs for contracts are allowable only to the extent that the costs incurred or cost estimates included in negotiated prices would be allowable under Subpart E-Cost Principles of the Uniform Guidance. WorkForce Central may reference its own cost principles as long as they comply. WorkForce Central will not use the “cost plus a percentage of cost” and “percentage of construction costs” methods of contracting.

E. Contracting with Small, Minority Businesses, Women’s Business Enterprises, Veteran-owned Businesses, and Labor Surplus Firms

When possible, WorkForce Central may use the following strategies to ensure small businesses, minority businesses, women’s business enterprises, veteran-owned businesses, and labor surplus area firms are considered for contracts.

- Include these business types on solicitation lists.
- Solicit these business types whenever they are deemed eligible as potential sources.
- Divide procurement transactions into separate procurements to permit maximum participation by these business types.
- Establish delivery schedules (for example, the percentage of an order to be delivered by a given date of each month) that encourage participation by these business types.
- Utilize organizations such as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce.
- Require contractors to apply this section to subcontracts.

F. Requirements for Federal Funding

1. Subrecipient and Contractor Determinations

WorkForce Central will make a case-by-case determination whether each contract or agreement it makes for the disbursement of federal program funds casts the party receiving the funds in the role of a subrecipient or a contractor. In determining whether a contract or agreement between WorkForce Central and another non-Federal entity casts the latter as a subrecipient or a contractor, the substance of the relationship is more important than the form of agreement. WorkForce Central will use judgment in classifying each contract or agreement as a subaward or procurement contract.

In compliance with 2 CFR 200.331, WorkForce Central will classify providers of WIOA Title I Youth, Adult, and Dislocated Worker services, and One-Stop Operators, as subrecipients.



2. Suspension and Debarment

WorkForce Central will utilize [SAM.gov](https://sam.gov) to ensure non-federal entities are not debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities as required in Executive Orders 12549 and 12689, 2 CFR part 180.

3. Contract Provisions

WorkForce Central's federally funded contracts must contain the applicable provisions described in [Appendix II, 2 CFR 200 - Contract Provisions for non-Federal Entity Contracts under Federal Awards](#).

G. WIOA Title I Procurement Requirements

WorkForce Central must make documentation related to procurement of one-stop operators and WIOA Title I service providers available to authorized federal, state, or pass-through entity representatives, upon request, that demonstrates:

- The procurement processes used to select one-stop operators and WIOA Title I service providers and how procurement processes were followed.
- Solicitations included the selection criteria by which proposals were scored.
- The Workforce Development Board and the public were made aware of the competitive process to be used to identify and select One-Stop Operator, Young Adult (Youth), and Adult and Dislocated Worker Training Services providers. This includes providing at least 30-day public notice through media where prospective local, state, and national respondents typically identify such opportunities
- Workforce Development Board approval of entities selected to provide One-Stop Operator, Young Adult (Youth), and Adult and Dislocated Worker Training Services. Documentation includes Workforce Development Board approval in meeting minutes that are posted on the WorkForce Central website and a link to the meeting minutes posted on the website page that announces the awarded organizations.

Whenever possible and where required, all WIOA Title I contracts will include performance requirements defined in measurable terms.

1. WIOA Title I One-Stop Operators

One-stop operators must be designated, certified, and selected through a competitive procurement process. The competitive process used by WorkForce Central to procure one-stop operators must be conducted at least every four (4) years and follow the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR [200.318](#) - [.326](#).



Sole source procurement for one-stop operators can be exercised only if it complies with federal procurement regulations at 2 CFR 200.320 and 20 CFR 678.610 and federal guidance in [TEGL 15-16](#) and the sole source procurement requirements outlined in this policy. WorkForce Central must be able to demonstrate they conducted sufficient research and outreach to justify using sole source procurement of one-stop operators. Evidence of publishing solicitations does not, by itself, sufficiently document the justification for sole source procurement. WorkForce Central must also document the solicitation was publicized in a manner providing for full and open competition. The Department of Labor interprets WIOA sunshine provisions at Sections 101(g) and 107(e) as requiring WorkForce Central to present documentation and justification of their decision to use sole source procurement for one-stop operators at Pierce County Workforce Development Board meetings to provide transparency and possibly attract additional respondents for the next competitive procurement.

WorkForce Central may serve as the local one-stop operator if they:

- Are determined to be the successful respondent in a solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318 - 200.326 and is administered by a fair and impartial third party. The Washington State Workforce Training & Education Coordinating Board (WTECB) and WorkForce Central may work together to establish a list of pre-qualified impartial third parties for this role.
- Establish and follow conflict of interest policies and procedures that identify appropriate internal controls approved by the Governor. Internal controls include the requirement that the solicitation and scoring process be managed by the fair and impartial third party and that WorkForce Central staff do not develop the solicitation for proposals, facilitate the scoring process, or score proposals.
- Submit a Washington State “Request for Waiver to Serve as One-Stop Operator” form to the WTECB and receive approval. ([Procurement and Selection of One-Stop Operators and Service Providers](#) – Attachment A)

2. WIOA Title I Youth Services

WorkForce Central must select eligible providers of WIOA Title I youth (young adult) services through a competitive procurement process. Sole source procurement is allowed only when it complies with federal procurement regulations and sole source procurement requirements in this policy.

WorkForce Central must establish and maintain local policies and procedures to assess the ability of WIOA Title I youth service providers to meet federal WIOA Title I common performance



accountability measures based on the primary federal indicators of performance for the WIOA Title I youth program.

WorkForce Central may serve as a local WIOA Title I youth service provider if they:

- Are determined to be the successful respondent in a solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318 - 200.326 and is administered by a fair and impartial third party. The WTECB and WorkForce Central may work together to establish a list of pre-qualified impartial third parties for this role.
- Establish and follow approved internal controls and conflict of interest policies. Internal controls include the requirement that the solicitation and scoring process be managed by the fair and impartial third party and that WorkForce Central staff do not develop the solicitation for proposals, facilitate the scoring process, or score proposals.
- Submit a Washington State “Request for Approval to Provide WIOA Youth Design Framework Services” from to the WTECB and receive approval. ([Procurement and Selection of One-Stop Operators and Service Providers](#) – Attachment D)

3. WIOA Title I Adult and Dislocated Worker Training Services

WorkForce Central must select providers of WIOA Title I adult and dislocated worker training services through a competitive procurement process. Sole source procurement is allowed only when it complies with federal procurement regulations and sole source procurement requirements in this policy.

WorkForce Central may serve as a local WIOA Title I adult and dislocated worker training services provider if they:

- Are determined to be the successful respondent in a solicitation that conforms to the principles of competitive procurement set forth in Uniform Administrative Guidance at 2 CFR 200.318 - 200.326 and is administered by a fair and impartial third party. The WTECB and WorkForce Central may work together to establish a list of pre-qualified impartial third parties for this role.
- Establish and follow approved internal control and conflict of interest policies. Internal controls include the requirement that the solicitation and scoring process be managed by the fair and impartial third party and that WorkForce Central staff do not develop the solicitation for proposals, facilitate the scoring process, or score proposals.
- Submit the Washington State “Request for Waiver to Provide WIOA Adult and/or Dislocated Worker Training Services” form to the WTECB and are granted a waiver by the Governor. ([Procurement and Selection of One-Stop Operators and Service Providers](#) – Attachment B)

4. WIOA Title I Adult and Dislocated Worker Career Services



WIOA does not require competitive procurement of WIOA Title I adult and dislocated worker career services, although competitive procurement methods may be used.

WorkForce Central may provide WIOA Title I adult and dislocated worker basic and individualized career services by agreement of the local Chief Elected Official and the Governor. WorkForce Central must submit a Washington State “Request for Approval to Provide WIOA Basic and/or Individualized Career Services” form to the WTECB and receive approval. ([Procurement and Selection of One-Stop Operators and Service Providers](#) – Attachment C)

REFERENCES:

- 2 CFR 200.317-.327
- OMB Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- WIOA law, sections 107(d)(10); 107(g)(1); 121(d)(1-2); 123; 134(c)(2)(C)
- 20 CFR 678.600-.635; 679.410; 679.430; 680.160; 680.300; 681.400
- TEGL 15-16
- TEGL 23-14, Section 8
- ESD Policy 5404, Rev. 1

WorkForce Central is an equal opportunity employer/program. Auxiliary aids and services are available upon request for individuals with disabilities. Washington Relay Service – 711.