



INDIANA UNIVERSITY

OFFICE OF PROCUREMENT SERVICES

January 9, 2025

Lola Oluborode, Branch Chief
Department of Health and Human Services
Cost Allocation Services
1301 Young Street, Suite 1140
Dallas, TX 75202

Dear Sir or Madam,

In accordance with 2 CFR § 200.320(a)(1)(iv), Indiana University is issuing this notification of self-certification to increase its micro-purchase threshold for Federally funded procurements from \$10,000.00 to \$50,000.00, effective February 10, 2025.

Pursuant to 2 CFR § 200.320(a)(1)(iv)(A), Indiana University certifies that it qualifies as a low-risk auditee under 2 CFR § 200.520. The self-certified micro-threshold is appropriate based on internal controls, risk evaluation, and documented procedures and will align the micro-threshold for all funds (federal and non-federal).

Internal Controls

Internal controls include, but are not limited to, regular internal and external audits, defined workflows, procurement conducted within a mature e-procurement system, additional reviews for high-risk or high-dollar transactions, conflict of interest reviews, training for procurement and non-procurement staff, acquisition justification process, standardized contract templates, and supplier on-boarding policies.

Evaluation of Risk

An evaluation of risk is performed based on the dollar amount of the type of acquisition. Transactions for acquiring technology, data sharing, and transactions with businesses or entities in foreign countries are deemed high-risk and are reviewed by institutional subject matter experts.

Documented Policies

Indiana University policy states that competitive bidding must be obtained on all procurements of goods or services above \$50,000 unless the requirement is a justified exclusive acquisition, emergency procurement, exempt procurement, or the purchase is made from a state, federal, institutional, or competitively procured cooperative contract. The \$50,000 limit applies to a one-time procurement or repetitive purchasing of the same goods or services during a fiscal year.

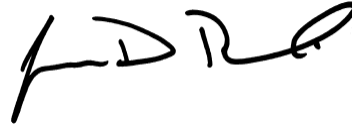
The micro-threshold policy is not prohibited by Indiana Law and will allow Indiana University micro-purchase threshold to align with Indiana Code 5-22-8-2.

Documentation will be retained in accordance with 2 CFR § 200.334 and the annual self-certification letter (appendix a) will be posted on the Office of Procurement Services for Indiana University's website.

Sincerely,



Baris Kiyar
Associate Vice President, Procurement Services
2709 E. 10th Street
Bloomington, IN 47408



Jason D. Dudich
Interim VP and Chief Financial Officer
Bryan Hall 212, 107 S. Indiana Ave.
Bloomington, IN 47405

Appendix A

Signed Self-Certification of an Increase to the Micro-Purchase Threshold for Indiana University, for balance of Fiscal Year 2025

Indiana University – located in the state of Indiana

Annual Self-certification of a Micro-purchase Threshold Higher than the Micro-purchase Threshold Established in the Federal Acquisition Regulations

Effective Date: February 10, 2025

Uniform Guidance (2 CFR 200) requires Indiana University to have and use documented procurement procedures, consistent with the standards of 2 §§CFR 200.317, 200.318, 200.319 and 200.320 for acquisition of property, supplies, or services required under Federal awards (or subawards). Per 2 CFR §200.320 (a), Indiana University, as a recipient and subrecipient may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost.

Under §200.320, Indiana University is responsible for determining and documenting appropriate micro-purchase threshold¹ based on internal controls, an evaluation of risk, and its documented procurement procedures. Indiana University may establish (self-certify) a micro-purchase threshold higher than the micro-purchase threshold established in the Federal Acquisition Regulations (FAR), up to \$50,000, in accordance with the documentation requirements of §200.320. The self-certification must include a justification, and supporting documentation of any of the following:

- (A) A qualification as a low-risk auditee, in accordance with the criteria in §200.520 for the most recent audit,
- (B) An annual internal institution risk assessment to identify, mitigate, and manage financial risks; or,
- (C) For public institutions, a higher threshold consistent with State law.

The purpose of this memo is to document Indiana University's self-certification process in accordance with §200.320 (a)(1)(iv).

I. Justification

Indiana University, as a governmental body of the State of Indiana, has the authority to modify its policies and procedures regarding procurement activities. Indiana University has internal controls and documented procedures in place to mitigate financial risks:

- State of Indiana procurement code (IC 5-22-8-2) states that small purchases, (less than \$50,000) are exempt from the competitive bid process and states, "For purchasesⁱ less than \$50,000 the purchasing agentⁱⁱ should follow policies established by the purchasing agencyⁱⁱⁱ or rules adopted by the governmental body."
- Indiana University is choosing to align with IC 5-22-8-2 for its micro-purchase thresholds.


¹ Micro-purchase threshold means the dollar amount at or below which a non-Federal entity may purchasing property or services using micro-purchase procedures (see §200.320)

II. Clear Identification of the Micro-purchase Threshold

Indiana University elects to align the micro-purchase threshold with the State small procurement threshold of \$50,000. Purchases under this elected micro-purchase threshold may be awarded without soliciting competitive price or rate quotations if Indiana University considers the price to be reasonable based on research, experience, purchase history, or other information and documents its files accordingly.

III. Supporting Documentation of Indiana University’s Election to Self-Certify a Higher Micro-Purchase Threshold than identified in the FAR:

This memorandum and supporting documentation will be maintained in the Indiana University Office of Procurement Services. Supporting documentation includes a copy of Indiana University’s most recent Single Audit Report for FY2023, which qualifies Indiana University as a low-risk auditee.

Signature: 
Name (print): Baris Kiyar
Title: Associate Vice President of Procurement Services
Date:

ⁱ “Purchase” – includes, buy, procure, rent, lease or otherwise acquire
ⁱⁱ “Purchasing Agency” – a governmental body that is authorized to enter into contracts by the procurement code, rules adopted, or by another law
ⁱⁱⁱ “Purchasing Agent” – an individual authorized by a purchasing agency to act as an agent in the administration of the duties of the purchasing agency