



Meeting Date: May 19, 2026
Consent Agenda: GRTC Procurement Manual Updates

BACKGROUND:

GRTC periodically reviews and updates its Procurement Manual to ensure consistency with applicable Federal, state, and local requirements. FTA issued Circular 4220.1G in January 2025, effective March 20, 2025, replacing Circular 4220.1F. Current federal procurement standards also continue to be governed by 2 CFR Part 200, including the procurement standards in §§200.317-200.327. The proposed revisions are intended to incorporate updates to FTA third-party contracting guidance and current Uniform Guidance procurement standards, improve internal controls and clarify procurement procedures for staff and user departments.

KEY CHANGES:

The proposed revisions include but are not limited to, the following:

- Updating federal references throughout the manual to reflect FTA Circular 4220.1G and current 2 CFR Part 200 procurement standards.
- Updating procurement thresholds to reflect the current federal thresholds, including a micro-purchase threshold of \$15,000 and a simplified acquisition threshold of \$350,000, effective October 1, 2025.
- Revising procurement method language to align with current 2 CFR 200.320 requirements for micro-purchases, simplified acquisitions, sealed bids, competitive proposals, and noncompetitive procurement.
- Strengthening requirements for procurement file documentation, including documentation of procurement method, contract type, contractor selection, and basis for price.
- Expanding conflict of interest and competition provisions to address both personal and organizational conflicts and reinforce full and open competition requirements.
- Adding or clarifying requirements for domestic preferences, recovered materials, cost and price analysis, debarment and suspension checks, and applicable federal contract clauses.
- Clarifying procedures for noncompetitive procurements, time-and-materials contracts, responsibility determinations, protests, and contract administration.

There is no immediate fiscal impact associated with adoption of the revised manual. The revisions are administrative in nature and are intended to support compliance with current

Federal procurement requirements for federally funded procurements. This may reduce compliance risk and strengthen internal procurement controls.

RECOMMENDATION:

That the Board of Directors approve the revised GRTC Procurement Manual as presented.

Ellen Robertson, Secretary
GRTC Board of Directors

Date