

Region One ESC Western Chronicles

4th Annual School Finance & Operations Conference
+ Purchasing Coop Product Show



PROCUREMENT ROUNDUP : WRANGLING YEAR-
END & NEW YEAR READINESS

ALBENTO ANGUIANO
PROCUREMENT COORDINATOR

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TRAILS END OUTCOMES

It's the end of the trail for Fiscal Year 2026. Year end is where mistakes can lead to audit findings.

Today we round up the risks, Responsibilities, and Rediness Steps by addressing:

- ✦ Stray Cattle – Year end Risk Compliance Risk
- ✦ Trail map to Sept. 1st – Readiness
- ✦ The Rulebook of the West – TEC & EDGAR
- ✦ Trusted Trading Post – Cooperative Purchasing
- ✦ Contracts & Branding Irons – Contract Management
- ✦ Outlaws & Red Flags – Ethics & Fraud Prevention
- ✦ Federal Gold Rush – Grant Compliance
- ✦ Call for Bids at High Noon – RFP/RFQ/IFB



Stray Cattle : Year End Compliance Risk

WHY YEAR END IS HIGH RISK

- ✧ Pressure to spend budget
- ✧ Increased Volume & short Time
- ✧ Short Cuts violating procurement
- ✧ Documentation often incomplete



Stray Cattle : Year End Compliance Risk

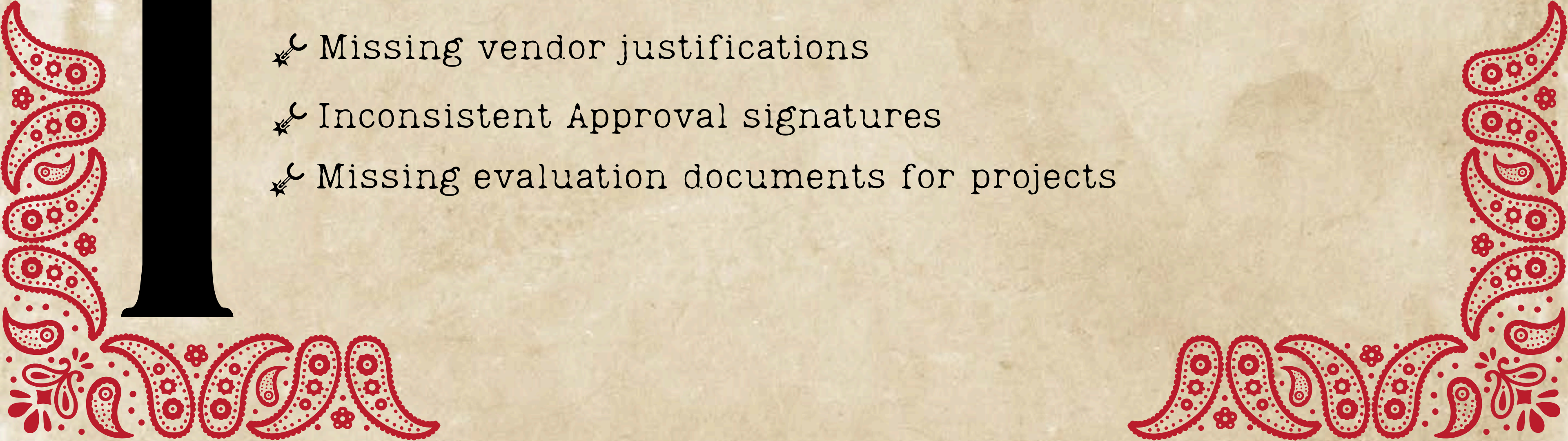
COMMON YEAR END STRAYS

- ✧ Splitting purchases to avoid thresholds
- ✧ Outdated or expired contracts
- ✧ Skipping required quotes or competition
- ✧ Back Dating documents



Stray Cattle : Year End Compliance Risk

RED BANDANAS (RED FLAGS)

- 
- ✧ Multiple POs right under threshold
 - ✧ Missing vendor justifications
 - ✧ Inconsistent Approval signatures
 - ✧ Missing evaluation documents for projects
- 

Stray Cattle : Year End Compliance Risk

HOW TO STAY IN COMPLIANCE

- ✧ Follow Thresholds regardless of urgency
- ✧ Use approved cooperative contracts
- ✧ Maintain complete procurement files
- ✧ Double Check approvals and documents

Trail map to Sept. 1st - Readiness

PREPERATION MATTERS

- ✧ Clean start reduces BOY chaos
- ✧ Prevents delays in purchasing
- ✧ Support budget alignment
- ✧ Ensures board approval purchases are timely

Trail map to Sept. 1st - Readiness

KEY EOY CHECKLIST

- ✧ Review open Purchase Orders
- ✧ Close or carry forward encumbrances
- ✧ Verify contract expiration dates
- ✧ Identify upcoming procurement needs

Trail map to Sept. 1st - Readiness

II CONTRACTS AND PLANNING

- ✧ Communicate timelines with departments
- ✧ Align purchases with approved budgets
- ✧ Determine which contracts to extend or rebid.
- ✧ Prepare board agenda items early

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THE RULEBOOKS OF THE WEST

★ FINANCIAL ACCOUNTABILITY SYSTEMS RESOURCE GUIDE
(FASRG)

★ TEXAS EDUCATION CODE
(TEC44.031)

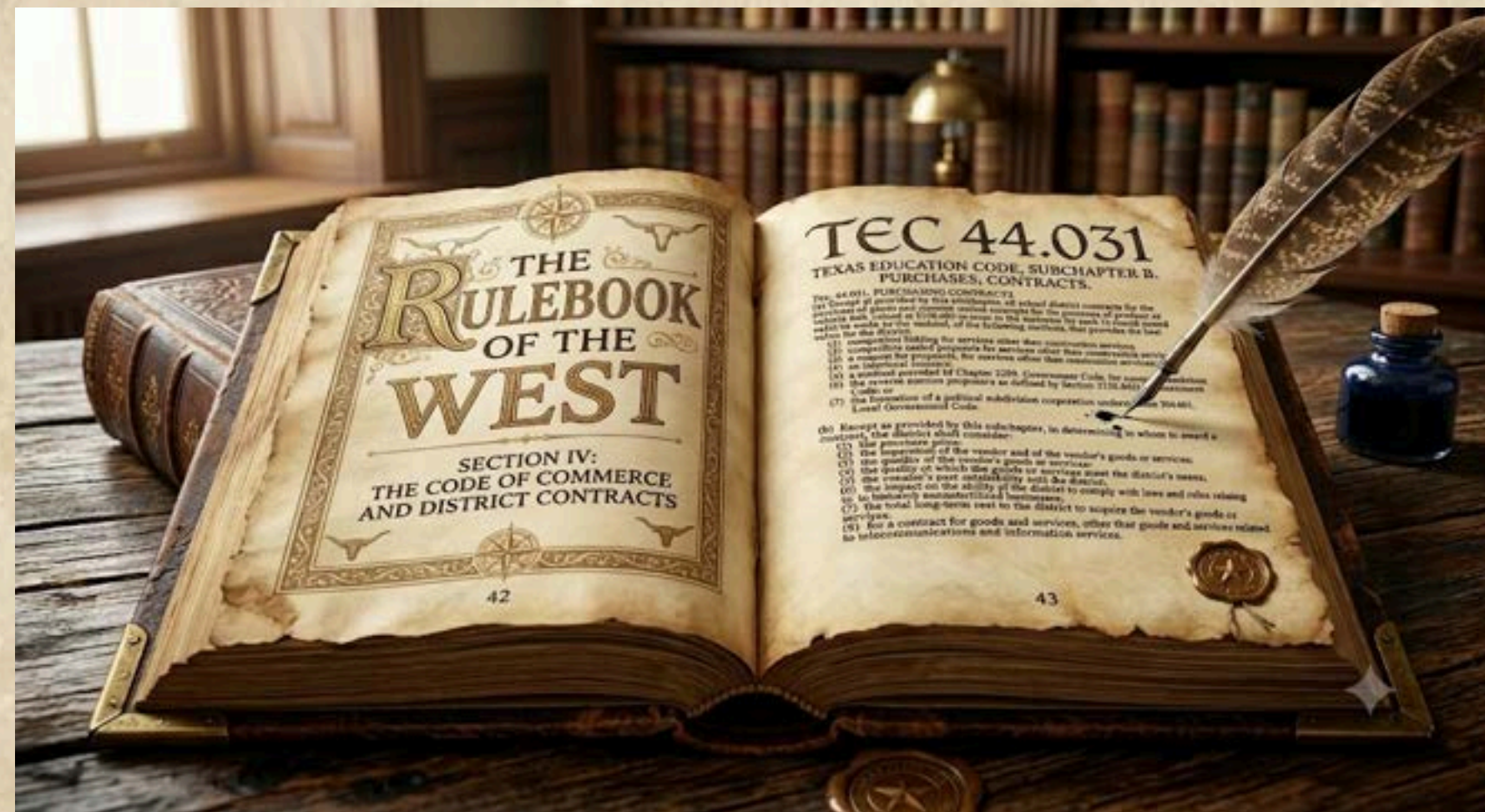
★ EDGAR
(2 CFR PART 200)

★ TEXAS GOVERNMENT CODE
TGC 2254 & 2269

Texas Education Code (TEC 44.031)

III

- ✧ Define Procurement methods and thresholds
- ✧ Requires competitive procurement over thresholds
- ✧ Emphasizes best Value, Not just lowest price.



Texas Education Code (TEC 44.031)

III

PROCUREMENT METHODS

- ★ Micro Purchase (\$0 – \$14,999.99)
- ★ Small Purchase Procedures (\$15,000 – \$99,999.99)
- ★ Competitive Sealed bids/proposals (over \$100,000)
- ★ Interlocal/ Cooperative Contracts

Education Department General Administrative Regulations

EDGAR (2 CFR 200.320)

III

★ Micro Purchase

- ✧ May be awarded without competitive quotations when the price is considered reasonable and purchases are distributed equitably among qualified suppliers when practicable.

★ Small Purchase

- ✧ Require obtaining price or rate quotations from an adequate number of qualified sources to ensure competition.

★ Formal Procurement Method

- ✧ Competitive Proposals (RFP,CSP,RFQ) are required when purchases exceed the Simplified Acquisition Threshold and conditions warrant formal competition.

★ Noncompetitive Procurement (Sole Source)

- ✧ Permitted only under limited circumstances such as a single source availability, public emergency, federal authorization, or inadequate competition after solicitation.

Education Department General Administrative Regulations

EDGAR (2 CFR 200.320)

III

COMMON COMPLIANCE GAPS

- ★ Using local rules for federal funds incorrectly
- ★ Missing cost/price analysis
- ★ Inadequate documentation of vendor selection

Common Compliance Gaps

III

- ★ Using local rules for federal funds incorrectly

- ✧ Following local district purchasing procedures without considering additional federal requirements.(meals)

- ★ Missing Cost/Price Analysis

- ✧ Districts must determine that the price being paid is fair and reasonable, particularly for certain larger procurements than \$350,000.

- ★ Inadequate documentation of Vendor Selection

- ✧ Procurement files should clearly document how vendors were solicited, evaluated, and selected.

Texas Government code

TGC 2254 & 2269

CONSTRUCTION



★ TGC 2254

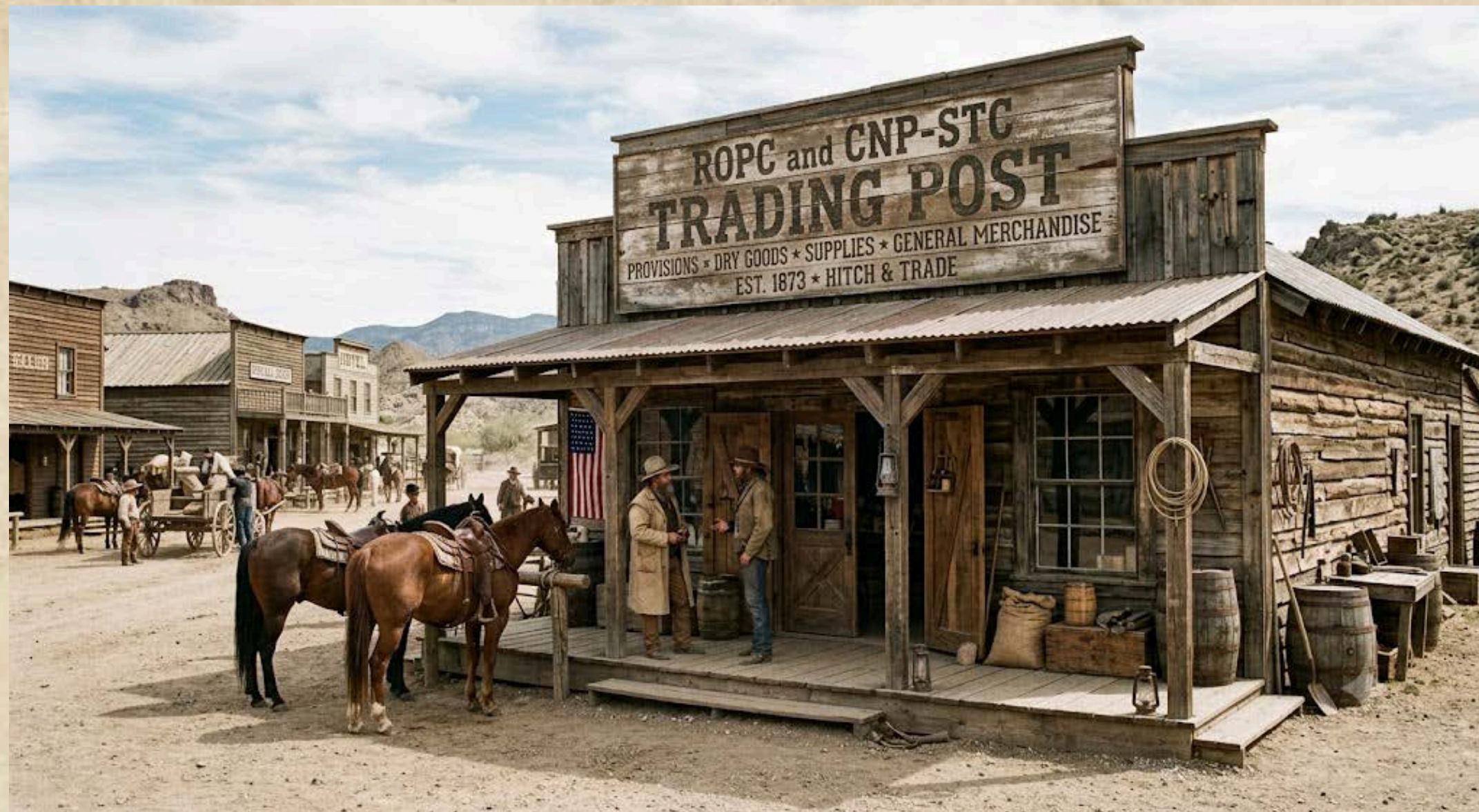
- ✧ school districts cannot select the professionals listed based primarily on price. They must be selected based on demonstrated competence and qualifications.
- ✧ Accounting, Architecture, Landscape architecture, Land surveying, Medicine, Optometry, Professional engineering, Real estate appraising, Professional nursing

★ TGC 2269

- ✧ Governs the construction delivery methods that school districts may use for public works projects. This includes: construction, alteration, rehabilitation, or repair of facilities.

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TRUSTED TRADING POST(COOPS)



Cooperative Contracts & Benefits

IV

- ★ Competitively procured contracts
 - ✧ Line item Contracts Vs Catalog Discounted Contracts.
 - ✧ Faster Procurement process
- ★ Saving Time and Administrative Efforts
 - ✧ Advertisements, Bid Packets, Contract management and upkeep
 - ✧ Access to vetted Vendors
- ★ Region One Purchasing Cooperative(ROPC) & Child Nutrition Programs – South Texas Cooperative
 - ✧ ROPC Active Contracts(18 Active Contracts)
 - ✧ Child Nutrition Programs-South Texas Cooperative (CNP-STC) 16 Active Contracts

Risks and Misuse

IV

- ★ Assuming all Co-Ops meet compliance automatically.
 - ✂ Federal Compliance Check when using federal funds under EDGAR
 - ✂ Federal Compliance Check
- ★ Not Verifying Scope Alignment
 - ✂ Ensure that items purchased are covered under proposes scope items/ services
- ★ Over – Reliance without evaluations
 - ✂ ROPC Active Contracts(18 Active Contracts)

Best Practices

IV

★ Confirm Contract meets District needs

- ✧ Ensure scope of the contract and awarded items meet the districts needs.

★ Documentation on Procurement Files

- ✧ Ensure that quotes list the cooperative name and number.
- ✧ Save Award Letters and justifications with procurement files.

★ Maintain Contract Documentation

- ✧ Ensure to keep contract term dates in mind. (Extensions and or Re-Solicit)

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CONTRACTS AND BRANDING IRONS



Why Contract Management Matters

V

★ Contracts Drive compliance and Performance

✧ Meet procurement threshold requirements and vendor ev

★ Poor Tracking leads to lapses or violations

✧ Ensure that contracts are not expired upon entering request.

★ Impacts Vendor Accountability

✧ Ensure that vendors are meeting all deliverables on the contracts.

Key Components

V

- ★ Contract Repository

- ✧ Maintain all executed contracts, amendments, renewals, and supporting procurement documents in one secure, organized location.

- ★ Expiration Tracking

- ✧ Maintain record of contract term deadline and available extensions

- ★ Renewal Planning

- ✧ Meet with departments and plan for extensions or re-solicitations

- ★ Performance Monitoring

- ✧ Survey feed back from end users of contracts

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OUTLAWS & RED FLAGS – ETHICS



Outlaws and Red Flags

VI

WHY ETHICS MATTER?

- ★ Protect District Integrity
- ★ Prevents Fraud and Abuse
- ★ Ensures fair vendor competition

Outlaws and Red Flags

VI

COMMON RED FLAGS?

- ★ Unusual pricing patterns
- ★ Conflict of Interest disclosure and transparency
- ★ Internal Controls (segregation of duties, approval workflows, Regular audits and reviews.)

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CALL FOR BIDS AT HIGH NOON

RFP

RFQ

CSP



Call for Bids at High Noon

STRONG SOLICITATION

VII

- ★ Clear Scope Prevents confusion
- ★ Attracts qualified vendors
- ★ Reduce risk of protest

Call for Bids at High Noon

EVALUATION BEST PRACTICES

VII

- ★ Use consistent scoring criteria
- ★ Document evaluation process
- ★ Train Evaluation Committees

Call for Bids at High Noon

AVOIDING PROTESTS

VII

- ★ Ensure fairness and transparency
- ★ Follow stated criteria
- ★ Maintain complete documentation

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FEDERAL GOLD RUSH



Federal Gold Rush - Grants

GRANT PROCUREMENT BASICS

- ✦ Follow Federal guidelines
- ✦ Allowable cost
- ✦ Proper documentation

KEY RISKS

- ✦ Misaligned spending timelines
- ✦ Lack of documentation
- ✦ Procurement Non Compliance

BEST PRACTICES

- ✦ Track Obligations vs. expenditures
- ✦ Maintain detailed records
- ✦ Coordinate with Finance and Program team

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TRAIL END TAKEAWAYS

- ★ Stay compliant even under pressure
- ★ Prepare early for new fiscal year
- ★ Maintain complete documentation
- ★ Follow stated criteria
- ★ Maintain complete documentation

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THE END

									
Lori Atwood Ramos	Albento Anguiano	Kristina C. Escobar	Daisy Cuevas	Kimberly Keller	Idania Gonzalez	Sandra Bazan	Erica Cruz	Marla Cavazos	Erika E. Rebeles
Director of Purchasing	Procurement Coordinator	Lead - South Texas Cooperative	Lead-Region One Cooperative	Lead - Local Foods	Procurement Technician	Procurement Technician	Procurement Specialist	Procurement Specialist	Procurement Technician
956-984-6123	956-984-6178	956-984-6012	956-984-6217	956-984-6249	956-984-6204	956-984-6120	956-984-6098	956-984-6819	956-984-6099