



MOHAVE COUNTY DEPARTMENT OF PROCUREMENT

Contracts Division

Central Services Division

700 West Beale Street, 1st Floor East, Kingman, Arizona 86401-5711

PO Box 7000, Kingman, AZ 86402-7000

Phone: (928) 753-0752 Fax: (928) 753-0787

DATE: July 3, 2025

TO: Procurement Staff

FROM:  Tara L. Acton, CPPB, Director of Procurement and Central Services

**SUBJECT: Procurement Department Procedures
Procurement of Goods and Services Under Federal Awards**

The following Procurement Department Procedures related to the procurement of goods and services using funds that require compliance with Federal purchasing guidelines shall be implemented immediately and stay in effect until otherwise amended or canceled. Where additional written procedures are needed to comply with the requirements of a specific Federal agency, award, grant, or program, they may be added as an amendment to this document.

General Guidance

- Procurement of goods and services under Federal Awards must be made in compliance with 2 CFR Part 200, where it is applicable to that Award.
- Procurement of goods and services under Federal Award must meet all requirements specific to the program, grant, and funding agency.
- The Mohave County Procurement Code must be adhered to under Federal Award, where applicable, as adherence to the Procurement Code meets the requirements of many Federal Award regulations.
- Where the requirements under the Mohave County Procurement Code, Federal regulations, and grant- or program-specific requirements overlap, the stricter requirements shall apply. Nothing in the Procurement Code shall prevent the County from complying with the terms and conditions of any Federal award.
- The County may utilize contracts through cooperative purchasing agreements with other government entities for Federal Awards. However, they must first investigate both the cooperative contract and the Procurement process followed to ensure that all Award requirements have been met.
- It is the responsibility of the County Department receiving a Federal Award to investigate its requirements prior to acceptance of the Award and to inform Procurement of those requirements prior to the commencement of any Procurement activities.
- Departments receiving Federal Award funding should consider the difficulty, expense, and viability of compliance with applicable regulations prior to applying for or accepting a Federal Award.

Specific Federal Regulation and Clauses

- Currently, Per 2 CFR Part 200 Appendix II, contracts under Federal Award must include the following clauses, if required:
 - Addressing termination for cause and for convenience;
 - Equal Employment Opportunity regulations;
 - Davis-Bacon Act;
 - Contract Work Hours and Safety Standards Act;
 - Rights to Inventions Made Under a Contract or Agreement;
 - Clean Air Act;

- Prohibiting the use of statutorily or administratively debarred or suspended contractors;
 - § 200.216 Prohibition on certain telecommunications and video surveillance equipment or services;
 - § 200.322 Domestic preferences for procurements; and,
 - § 200.323 Procurement of recovered materials.
- When required as part of a Federal Award, the County must take all necessary affirmative steps to assure minority businesses, women's business enterprises, and labor surplus area firms are used when possible (2 CFR Part 200.321). Affirmative steps must include:
 - Placing qualified small and minority businesses, and women's business enterprises on solicitation lists;
 - Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
 - Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises;
 - Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
 - Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and,
 - Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in above.
- Federal Awards may also require compliance with other regulations, such as the Copeland "Anti-Kickback" Act and Byrd Anti-Lobbying Amendment, among others.

Please distribute this information to the appropriate members of your assigned end user departments.

Cc: Sam Elters, P.E., County Manager, County Engineer
Luke G. Mournian, CPA, Chief Financial Officer