Program Operator Self Certification Form for Increased Micro-Purchase Threshold Justification

Name of Program Operator	
Name of Program Operator Staff Completing the Self-Certification	
1. Justification (why you want to self-certify a higher micro purchase threshold than $15,000. Evaluate the purchases risk and document the determination that utilizing a noncompetitive form of procurement was worth the risk)	
Identify your Micro-Purchase Threshold (may be up to $50,000). This must also be identified on your written food service procurement procedures or policy.	
2. Supporting Documentation (of any of the following): 1) Low Risk Auditee Criteria Met 2 CFR 200.520 (most recent audit was determined low-risk auditee) 2) Annual Internal Institutional Risk Assessment (in-depth review of your procedures and internal controls to identify, mitigate, and manage finance risk) 3) For public institutions, a higher threshold consistent with state law (N/A for Montana)	

Program Operators must ensure that they meet all Self-Certification requirements on an annual basis. If any other regulatory or financial departments, agencies, entities and/or reporting require notification of a Program Operators Self-Certification to increase the micro-purchase threshold, it is the responsibility of the Program Operator to provide the required information.

Program Operator determination of allowability	☐ Allowable	☐ Not allowable
All required documentation is maintained	☐ Yes	☐ No

Increased Micro-Purchase Threshold Information

§200.318 General procurement standards: The non-Federal entity must have and use documented procurement procedures, consistent with State, local, and tribal laws and regulations and the standards of this section, for the acquisition of property or services required under a Federal award or subaward. The non-Federal entity's documented procurement procedures must conform to the procurement standards identified in §§ 200.317 through 200.327.

Per USDA guidance *Updates to the Federal Micro-Purchase Threshold in 2 CFR 200.320(a)(1) SP 02 CACFP 03 SFSP 01-2022*, Program operators have the discretion to utilize the micro-purchase method of procurement for purchase up to $50,000 if specific criteria are met.

Micro-purchases may be awarded without soliciting competitive price or rate quotations, if the program operator "considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly." 2 CFR 200.320(a)(1)(ii).

Government-wide regulations at 2 CFR 200.320(a)(l)(iii) now provide that Program operators are "responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk and its documented procurement procedures." This regulation now allows Program Operators to utilize the noncompetitive micro-purchase method for purchases up to $50,000 if specific criteria are met and documented by the Program Operator. All required documentation must be maintained by the Program Operator for three years plus the current and will need to be provided upon request and for Procurement Reviews.

Government-wide regulations at 2 CFR 200.320(a)(iv) provide that program operators may self-certify a threshold up to $50,000 on an annual basis and must maintain documentation of such self-certification. Program operators choosing to self-certify must prepare and include a justification for the choice. The self-certification must include a justification, clear indication of the threshold, and supporting documentation of any of the following:

1. A qualification as a low-risk auditee, in accordance with the criteria in 2 CFR 200.520;
    - Criteria for a low-risk auditee:
      An auditee that meets all of the following conditions for each of the preceding two audit periods must qualify as a low-risk auditee and be eligible for reduced audit coverage in accordance with §200.518.
      (a) Single audits were performed on an annual basis in accordance with the provisions of this Subpart, including submitting the data collection form and the reporting package to the FAC within the timeframe specified in §200.512. A non-Federal entity that has biennial audits does not qualify as a low-risk auditee.
      (b) The auditor's opinion on whether the financial statements were prepared in accordance with GAAP, or a basis of accounting required by state law, and the auditor's in relation to opinion on the schedule of expenditures of Federal awards were unmodified.

(c) There were no deficiencies in internal control which were identified as material weaknesses under the requirements of GAGAS.
(d) The auditor did not report a substantial doubt about the auditee's ability to continue as a going concern.
(e) None of the Federal programs had audit findings from any of the following in either of the preceding two audit periods in which they were classified as Type A programs:

- Internal control deficiencies that were identified as material weaknesses in the auditor's report on internal control for major programs as required under §200.515(c);
- A modified opinion on a major program in the auditor's report on major programs as required under §200.515(c); or
- Known or likely questioned costs that exceeded five percent of the total Federal awards expended for a Type A program during the audit period.

2. An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or
3. For public institutions, a higher threshold consistent with state law.