



**SESSION 3 PARTICIPANT HANDOUT**

# Procurement, Risk & Quality

*Buying Right, Managing Risk, Building to Last — Your Desk Reference*

April 23, 2026 | Rural Capacity Assistance Program

---

## How to Use This Handout

Keep this document at your desk. It is built as a reference, not a transcript. Each section pairs a plain-language explanation with a table or checklist you can use on your own project.

If you only have time to use one tool from this handout, use the "Which Threshold Applies?" table on page 2. Choosing the wrong procurement method is the most common — and most expensive — compliance mistake on federally funded projects.

### **The One Rule That Governs Everything**

When you use federal funds, always apply the MORE restrictive of the federal or state requirement. If federal needs quotes and the state doesn't, you get quotes. If the state needs a formal bid and federal doesn't, you run the formal bid.

## Additional Support

**Tiffany Quintero, Principal Consultant | CAP Contract Alliance, LLC**

Tiffany@CAPContractAlliance.com | 541-668-4117

[www.CAPContractAlliance.com](http://www.CAPContractAlliance.com)



# Part 1: Procurement Thresholds

## Federal Thresholds — 2 CFR 200 (effective October 1, 2025)

Method	Threshold	Requirements
Micro-purchase	\$15,000 or less	No competitive quotes required. Price must be reasonable (document the basis). Distribute equitably among qualified suppliers.
Micro-purchase (Davis-Bacon)	\$2,000 or less	Applies to construction subject to prevailing wage. No quotes required, but price must still be reasonable.
Small purchase	\$15,001 – \$350,000	Minimum two quotes from qualified sources. Keep written documentation of quotes received. Award to lowest price or best value.
Formal competitive	More than \$350,000	Sealed bids or competitive proposals. Public advertising required. Full documentation and protest procedures.

## Oregon State Thresholds — ORS 279B (updated September 2023)

Method	Threshold	Requirements
Small procurement	\$25,000 or less	Direct award without a competitive process. Price reasonableness recommended. Cannot artificially divide to stay under threshold.
Intermediate procurement	\$25,001 – \$250,000	Minimum three quotes (fewer if documented). Written record of quotes and sources. Award to best value — price plus other factors.
Formal competitive	More than \$250,000	Invitation to bid or request for proposal. Public advertising on OregonBuys. Formal evaluation and protest procedures.

*These two ladders don't line up. The next page shows which one wins at each dollar amount when federal funds are involved.*



## Part 2: Which Threshold Applies?

Use this table when you spend federal funds on an Oregon project. Find your purchase amount, then follow the method named in the last column. When in doubt, run the more competitive process — you are never penalized for getting an extra quote.

Purchase Amount	Federal Rule	Oregon Rule	You Must Follow
\$0 – \$2,000 (construction)	Micro-purchase	Small procurement	<b>Federal (more restrictive)</b>
\$2,001 – \$15,000	Micro-purchase	Small procurement	<b>Either (same effect)</b>
\$15,001 – \$25,000	Small purchase (2 quotes)	Small procurement	<b>Federal (requires quotes)</b>
\$25,001 – \$250,000	Small purchase (2 quotes)	Intermediate (3 quotes)	<b>Oregon (more quotes)</b>
\$250,001 – \$350,000	Small purchase (2 quotes)	Formal competitive	<b>Oregon (formal process)</b>
More than \$350,000	Formal competitive	Formal competitive	<b>Both (same requirement)</b>

### Never Split a Purchase

Dividing one purchase into smaller pieces to slip under a threshold is a compliance violation — even if each piece looks reasonable on its own. Check your local rules too: your city or county may set thresholds lower than the state minimums above.



## Part 3: Contract Documentation Checklist

If it is not documented, it did not happen. Build the file as you go — reconstructing it at audit is far harder than keeping it current.

### Before Award

- Independent cost estimate prepared before solicitation
- Procurement method justification (which threshold and why)
- Solicitation documents (scope, specifications, evaluation criteria)
- All quotes and bids received, dated and retained
- Evaluation documentation showing the basis for selection

### The Contract Itself

- Signed contract with a clear scope of work
- Payment terms and schedule
- Insurance certificates on file
- Required federal clauses included (2 CFR 200 Appendix II)
- Performance and payment bonds, if required

### After Award

- Notice to proceed issued
- Change orders approved in writing BEFORE the work is done
- Payment requests with backup documentation
- Inspection reports filed
- Final acceptance documentation

# Part 4: Risk Management

## Risk Register Template

Identify risks before they become problems. Score each risk by probability and impact, assign one owner, and review the register at every project meeting. The first row is a worked example.

Risk ID	Description	Prob	Impact	Response	Owner	Status
R-001	Soil conditions differ from survey	Med	High	Include geotech in design; carry 10% contingency	Engineer	Open

### Four Ways to Respond to a Risk

- Avoid** — change the plan to eliminate the risk entirely.
- Mitigate** — reduce the probability or the impact (design review, phasing, testing).
- Transfer** — shift the risk to another party (insurance, bonds, contract terms).
- Accept** — acknowledge it and hold a contingency to cover it if it happens.

**Plan Your Contingency Up Front**  
 Carry 10–15% contingency on construction projects. The communities that get into trouble are the ones that budgeted zero for the unexpected — and then had nowhere to turn when the unexpected arrived.



## Part 5: Construction Quality Control

You cannot un-pour concrete. Inspect before you cover, and document every inspection while the work is still visible.

### Before Construction

- Pre-construction meeting held with contractor and inspector
- Inspection schedule established and shared
- Testing requirements defined (materials, compaction, etc.)
- Submittal review process in place

### During Construction

- Regular site visits documented
- Daily logs maintained
- Progress photos taken and dated
- Material testing completed and results filed
- Inspection reports on file before work is covered

### At Completion

- Punch list completed and signed off
- Final inspection passed
- As-built drawings received
- Operations & maintenance manuals provided
- Warranties documented and filed

## Part 6: Infrastructure Funding to Watch

These programs fund the kinds of construction projects the procurement rules in this handout govern. Note that most also carry their own federal procurement and Davis-Bacon requirements — the more-restrictive rule from Part 2 still applies. Connect with your Business Oregon Regional Development Officer or EDD partner before applying.

Program	Best Fit For	Structure	2026 Deadline
<b>Business Oregon SPWF</b>	Planning, design & construction of utilities and facilities for municipalities	Low-cost loan; limited TA/emergency grants	Year-round — contact RDO
<b>Safe Drinking Water RLF (DWSRF)</b>	Drinking water planning, design & construction for public water systems	Loan up to \$10M	LOI by Aug 15, 2026
<b>DEQ Clean Water SRF (CWSRF)</b>	Wastewater treatment, stormwater, and related clean-water projects	Low-interest loan, up to 30 yrs	Next deadline Oct 9, 2026
<b>USDA RD Water &amp; Environmental</b>	Water and waste disposal systems in communities under 10,000 population	Loans + grants	Rolling intake
<b>USDA Community Facilities</b>	Essential community facilities for areas under 20,000 population	Loans, guarantees, grants	Rolling; SECD Jun 30

*Deadlines move. Verify current dates with the program before you build your schedule around them.*

### Three Things to Remember

- 1. Document your procurement decisions.** If it is not documented, it did not happen. Keep written records of every quote, comparison, and award decision.
- 2. Identify risks before they become problems.** Maintain a risk register and carry 10–15% contingency on construction.
- 3. Inspect before you cover.** You cannot un-pour concrete. Document inspections while the work is still visible.



## Resources

- RCAP Resource Page — [oregon.gov/biz/programs/RCAP/project-management](https://oregon.gov/biz/programs/RCAP/project-management)
- 2 CFR Part 200 (Uniform Guidance), incl. Appendix II clauses — [ecfr.gov](https://ecfr.gov)
- Oregon Public Contracting Code (ORS 279A/279B/279C) — [oregonlegislature.gov](https://oregonlegislature.gov)
- OregonBuys procurement portal — [oregonbuys.gov](https://oregonbuys.gov)
- Business Oregon Infrastructure Finance — [oregon.gov/biz](https://oregon.gov/biz)
- Davis-Bacon wage determinations — [sam.gov](https://sam.gov)

## Technical Assistance

**Tiffany A. Quintero, MBA, PMP** — Principal Consultant, CAP Contract Alliance, LLC

[Tiffany@CAPContractAlliance.com](mailto:Tiffany@CAPContractAlliance.com) | 541-668-4117

