General Procurement Policy

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I. Purpose
This policy contains general policies governing activities of the Einstein Office of Procurement and Business Services.

II. Scope
The Procurement practices and procedures contained in this administrative policy apply to all purchases if they are to be the legal and financial obligation of Einstein, as such, all Sponsored and Non-Sponsored purchases are subject to the policies contained herein as well as policies or requirements set forth by the various agencies. The College is not responsible for obligations incurred unless there is full compliance with this policy.

III. Policy
A. Organization of the Procurement Department
Procurement Services (Procurement), a division of Finance and Administration of the Albert Einstein College of Medicine, Inc. (Einstein) and reports to the Associate Vice President Business Services (AVP) of the College. Offices are located in the Belfer Building Room 105 on the Resnick Campus.

Procurement is the only agency on the Einstein campus which may authorize acquisition of products or services to be paid from College accounts. College business policy states that if purchases are made in violation of the rules and regulations of the College, the persons responsible may be held personally liable for any financial commitment made.

1. Procurement Services
Procurement is responsible for the entire procure to pay process (P2P). The College employs Contracts Administrators who are assigned to specific Commodities.

For a complete list of Procurement staff and associated commodities please visit http://www.einstein.yu.edu/administration/procurement/staff/.

B. Standards and Ethics
1. Procurement Standards and Ethics
Procurement personnel exercise sound business judgment and maintain the highest ethical standards in the conduct of College business. Relationships with suppliers will support the promotion of environmentally preferred practices, diverse business utilization, and small businesses.

- Foster fair, ethical, and legal business practices that promote the College's mission.
- Grant all competitive offers equal consideration to the extent the established policies of Einstein permit and regard each transaction on its own merit.
- Cooperate with trade and industrial associations, governmental and private agencies that are engaged in the promotion and development of sound business methods.
- Conduct business with potential and current suppliers in an atmosphere of mutual confidence and integrity. Relationships with suppliers will support the promotion of environmentally preferred practices, diverse business utilization, and small businesses.
2. **Conflicts of Interest**

   a) **For Staff**

   Einstein employees involved in committing any College managed funds shall not have a business interest or a family relationship with a supplier of goods of services to the College so as not to impair the integrity and objectivity of the purchase. An apparent conflict of interest, or at a minimum, the appearance of one, may exist if any employee has a direct or material indirect financial interest in a vendor company or when there is a family or other personal relationship.

   All instances where conflicts of interest appear or are suspected must be brought to the immediate attention of the AVP.

   b) **For Vendors**

   Vendors doing business with Einstein shall not have a business interest or a family relationship with any faculty or staff at the Einstein so as not to impair the integrity and objectivity of the purchase. An apparent conflict of interest, or at a minimum, the appearance of one, may exist if a vendor has a direct or material indirect financial interest with a family or other personal relationship.

   All instances where conflicts of interest appear or are suspected must be brought to the immediate attention of the AVP.

   Vendor must certify their Conflict of Interest status by filling out the General Supplier Information form (GSI), when applying for vendor status. Procurement will update the vendor status yearly or as required. Vendors exceeding $50,000 per year shall be supplied with a Conflict of Interest form. The records will be reviewed quarterly, and a Conflict of Interest will be sent as needed.

   c) **Gifts and Gratuities**

   College employees are prohibited from purchasing personal items from vendors who transact business with the College unless that vendor has a retail operation normally open to the public or otherwise pursuant to a College employee discount program. In all cases, employees may not use their employment with the College to influence the vendor in any way. If an employee does transact personal business with one of the College's vendors, the employee must exercise caution as to the appropriate invoicing for personal purchases, and all purchases is made from, no personal packages are to be delivered to the College. Salespersons normally servicing College accounts are not to be involved in any personal transactions.
In addition, employees are not permitted to solicit or receive any gifts or gratuities of any nature that would, or reasonably could, be expected to influence their responsibilities to the College. Thus, all gifts or gratuities from companies or individuals doing business or seeking to do business with the College are prohibited. Employees should also refer to the policies of their school or department as they may be more restrictive than the College policy.

C. Environmentally Preferable Procurement Policy

1. Energy and Sustainability

As part of a greater commitment to sustainability, Einstein has established an Environmentally Preferable Procurement (EPP) Policy. The goal of this policy is to make Einstein and the surrounding community a healthier, more environmentally friendly place.

A. Procurement will make every effort to secure contracts with suppliers that are environmental leaders in their respective markets, whenever practical or feasible.

B. Procurement will purchase products that meet third-party approved eco labels when possible and practical. (i.e., Green Seal Approved Products, Forest Stewardship Council (FSC) Certified Products, Rainforest Alliance Products, Ecologo.)

C. Procurement will purchase Energy Star rated Appliances and Fixtures in all areas for which such ratings exist. Please visit http://www.energystar.gov/index.cfm?fuseaction=find_a_product for more details.

Procurement services takes into consideration the following when purchasing your goods and services:

- Recyclability of the product
- Minimization of product packaging
- Maximization of energy/water conservation
- Durability as opposed to one-time use
- Locally or regionally manufactured products
- Minimization of toxic and hazardous materials, i.e., no Chlorofluorocarbons (CFCs), Mercury free, Urea Formaldehyde free, and low Volatile Organic Compounds (VOCs)
- Maximization of recycled content
- Emphasize lowest life cycle cost and lowest environmental impact
- Reuse of existing products or materials
- Renewability of materials

2. Procedures

a) Vendor Requests

Requisitions submitted will include the following statement or something similar identifying and/or requesting environmentally preferable alternatives. Requesting units may ask for assistance from the Procurement in identifying green alternatives.

Einstein is committed to purchasing products that are more environmentally friendly, energy efficient and healthier for our students, faculty and staff. Please, where possible, provide any “greener” product.
alternatives; preference may be given to products that meet third party green certification(s). A list of certifications can be found at http://www.business.gov/expand/green-business/green-marketing/green-certification.html.

b) Department Responsibility

To assist the College in its goals for a sustainable future, departments are requested to consider environmentally preferable products such as:

- Recycled-content and chlorine-free paper products
- Energy Star rated appliances and equipment
- Energy efficient lighting and light bulbs
- EPEAT certified green electronic equipment
- Biodegradable-bio based, Green Seal certified cleaning products
- Recycled building materials: recycled concrete, carpeting made from recycled-content materials, etc.
- Low or no VOC paints adhesives and solvents
- Alternative fuels for use in vehicles such as biodiesel, compressed natural gas, electric, or other alternatives as they become available

D. Supplier Diversity

It is the policy of Einstein that Women Owned Businesses, Minority Owned Businesses, Veteran Owned Businesses, Service-Disabled Veteran Owned Small Businesses, Small Businesses, Small-Disadvantaged Businesses, Small Businesses located in HUB Zones, collectively referred to as "Diversity Businesses", be afforded the maximum practicable opportunity to supply products and services to the College. The College, through Procurement, actively encourages participation by Diversity Businesses in its purchasing programs, and in accordance with Federal guidelines, seeks to include Diversity Businesses in the competitive bidding process and use them to the extent possible. The College, through Procurement, works to assist Diversity Businesses with the challenges of meeting the College's business and procurement requirements.

This policy is designed to reflect the College’s strong commitment to the principles of Executive Order 11246 and Public Law 95-507 and their implementing regulations, and to ensure that the College’s business practices and procedures are in compliance with such principles.

It is the intent of the College that all vendors, regardless of size or classification, have the same and equal opportunity to become suppliers to the College.

E. Purchase Authorization

To minimize institutional vulnerability to legal claims, unintended program obligations and financial liabilities, all contracts, letters of agreement, leases, real estate and construction documents and service contracts must be reviewed as to form and approved by the Office of General Counsel before any commitments are undertaken.

After documents are approved as to form by the Office of General Counsel and execution is authorized, the next step, in many instances, is the preparation and the submission of a purchase order and its budget
approval in accordance with the purchasing procedures as outlined in this policy. The written approval of
the Office of General Counsel, as to contract documents and any comments, should be attached to the
purchase order.

Do not attempt to negotiate with the vendor. Procurement will perform all negotiations and obtain the
appropriate institutional authorized signature for any required documents.

If this procedure is not followed, the institution will not be responsible for the financial and legal
consequences.

Deans, chairpersons, directors and administrators are authorized to approve expenditures of College funds
based upon prior approved budgets. Principal investigators are authorized to approve expenditures of
restricted funds based upon prior approved budgets. No purchases can be made without prior approval
and verification of the availability of funds. Therefore, Procurement will only issue an official purchase
order when the procurement requisition has been previously approved by an authorized signatory.

1. Approvals

Purchase requisitions for Equipment valued in excess of $500, or Shipments to Off-Site Locations, must
be sent to Research Finance for approval. In addition, for any items shipped to a location other than a
College facility, the order must be forwarded to the Finance Department for approval.

All expenses greater than $5,000 require approvals as follows:

<table>
<thead>
<tr>
<th>Dollar Amount</th>
<th>Einstein Approver</th>
</tr>
</thead>
<tbody>
<tr>
<td>$0 - $5000</td>
<td>Department only</td>
</tr>
<tr>
<td>$5,001 - $100,000</td>
<td>Budget Director</td>
</tr>
<tr>
<td>$100,001 - $250,000</td>
<td>Budget Director</td>
</tr>
<tr>
<td>$250,001 - $500,000</td>
<td>CFO</td>
</tr>
<tr>
<td>$500,001 - $1,000,000</td>
<td>CFO</td>
</tr>
<tr>
<td>&gt; $1,000,000</td>
<td>CFO and Board</td>
</tr>
</tbody>
</table>

The College's Electronic Procurement System (EPRO) includes dynamic workflow that moves the
requisition through the system based on roles and security. If you're a requestor you should utilize the
workflow by not assigning the cart to your approver. You have to click "Submit to Workflow." Your
approver will not be able to process your request if it is not in Workflow.

2. Procedures

A requisition is initiated via EPRO and, once approved, (via workflow), reaches Procurement, this
authorizes Procurement to order goods and services on behalf of the requesting department.

F. Unauthorized Purchases

Procurement has the exclusive responsibility for approval of all purchase contracts entered into for the
College. College personnel must not sign any contract documents unless they are specifically authorized.
Purchases charged against College funds that are made contrary to College policies will be the personal responsibility of the individual placing the order.

1. Confirming Orders

A confirming order occurs when a department wishes to place an order for a needed item or service without subjecting the purchase to the normal purchasing procedures of the College. Confirming orders are permitted only in bona fide emergency situation. Examples of bona fide emergencies are a College owned motor vehicle in need of road repairs, emergency equipment repairs and other situations resulting from unforeseen circumstances. Poor planning or poor management are not acceptable reasons for placing a confirming order. The AVP is responsible for the interpretation of "emergency situations." The nature of the emergency that promulgated the confirming order should be stated in the notes section and approved by the department head for College purchases or the principal investigator for grant purchases.

If a bona fide emergency condition exists which warrants a confirming order, the following procedure is to be utilized. An emergency purchase order number must be obtained from Procurement prior to placing the order with the vendor. Enter your request electronically or call Procurement services at 718.430.3001 giving specific information regarding your order (i.e., Req. Number) to the Procurement personnel, who will complete the order and issue an emergency purchase order number after financial approval has been obtained.

When an emergency purchase order number is requested for repairs or service, the requisition should be submitted after the service is completed and the service report must be forwarded to Procurement. The vendor should be requested to mail the invoice showing our purchase order to Einstein, Accounts Payable office, for processing and payment.

Individuals requesting Emergency Purchase Order numbers for confirming orders, who abuse the system through excessiveness or lack of follow-up documentation, will forfeit the ability to use the emergency system.

G. Section 2.3 EPRO Roles

**Shopper** - These users can shop for items and assign their shopping cart to Requesters to process but cannot themselves submit a cart for approvals. This is the most common role in the procurement process, with many shoppers in each School/Department. If you used to shop on EPRO and assign your cart to someone else for processing and currently had no access to EPRO for procurement, then you are a shopper.

**Requisitioner (Requester)** - These users can shop for items, change/add GL number(s) on carts assigned to them and submit carts to approval workflows. Typically, there are several requesters in each School/Department depending on the size of the department.

**Approver** - These users review (approve and reject) purchase requisitions that are assigned to them by the system, based on their function (typically, it is the Departmental Administrators and Manager). Approvers can also shop. There is usually one or two per School/Department and most often this role is performed by the Administrator, Director, or Manager (similar to the "Budget Manager" role in Banner Finance).

**Requestor/Approver** - This role is a combination of the Requester and the Approver roles. Caution should be exercised when giving someone the Approver/Requester authorization, as he/she will be able to
approve their own orders (requisitions) up to $5,000, and can also approve orders - under $5,000 - of other Requesters within the Department, Division, or School. It is recommended by our auditors, and a good procurement practice in general, that a request for goods and services has two levels of approval, a Requester and an Approver. However, in certain cases we understand that this is not entirely possible. If this is the case in your Department, Division or School you can request that certain individuals be given the Approver/Requester role.

**H. Solicitations/Demonstrations/Sole Source Purchases**

College policy requires that supplies and materials in excess of $10,000 be obtained by competitive bidding.

1. **Bidding Guidelines**

   **Items from $10,000 to $149,999:**

   Procurement shall solicit a minimum of three quotations from responsible vendors. Documentation of the quotes will be noted on the purchase order. It is up to the purchasing professional if a sealed formal bid should be performed. Generally, the purchase is made from the vendor quoting the lowest price, whose product and offer complies with the terms of the solicitation. If the purchase is not made from the bidder quoting the lowest price, a written justification for the low bid bypass will be retained by Procurement.

   **Items $150,000 and Over:**

   Procurement shall solicit a minimum of three sealed written competitive bids from reliable vendors. The written quotes will be retained by Procurement. Purchase will be made from the vendor quoting the lowest price, whose product and offer complies with the terms and specifications of the solicitation. If the purchase is not made from the bidder quoting the lowest price, a written justification for bypassing the low bid will be made and retained by the Procurement. A bypass of a low bid requires the approval of the AVP.

2. **Evaluating the Bids**

   Once the bids are received, they must be evaluated to determine which vendor will be given the order.

   If the products offered by each of the bidding vendors are of equal quality, if each vendor promises the same delivery date and if there are no other considerations, the order would go to the low bidder. However, all these factors are seldom equal, and many orders are, therefore, placed with other than the low bidder for good reasons. No set formula can be devised that can be applied to all products for all orders. The quality and delivery requirements will vary for different products and for different uses. The delivery requirements may vary for different orders as well. For these reasons, the act of selecting the bid which best suits the needs of the College's is one that requires the judgment and experience of Procurement. The selected vendor is informed via receipt of a purchase order. The others are informed via a correspondence from Procurement.
3. **Follow-up of Non-Bidders**

A bidders list that is active and current is maintained by Procurement. This stimulates competitive bidding and should result in maximum response to an invitation to bid. Those requesting the purchase of goods or service subject to competitive bidding must allow sufficient lead time, so all solicited vendors are able to submit timely bids. Within existing time constraints, alternate vendor(s) will be sought to provide bids. Vendors not returning a bid will be queried as to the reasons they chose not to respond, and Procurement bidders list will be updated accordingly.

4. **Sole Source/Directed Source Request**

The originator of the purchasing requisitions frequently suggests or requests a specific manufacturer or supplier. Procurement will review the request for reasonableness but reserves the right (after discussion with the requesting department) to place orders with vendors whose prices are lower than those of the vendor that appears on the requisition. When an item is unique, available from only one supplier or a substitution is not feasible (commonly referred to as "sole source or directed source"), a sole source justification form must be filled out, approved by a department head for College fund purchases or the principal investigator for grant purchases, must be completed. Procurement will determine the reasonableness of the request for waiver by investigating the price and services available from the "sole source" vendor. The justification must be approved by the AVP.

5. **Sole Source/Directed Source Justification**

Although competition may be waived, it is required wherever possible. When a justification is considered, Procurement may negotiate with a potential vendor in an effort to acquire the best quality, price, delivery, and terms and conditions. If performance or price competition is not available, the Sole Source/Directed Source Justification form must be used. Conditions permitting a Sole Source/Directed Source Justification include, but are not limited to:

- Performance or price competition is not available.
- Necessary product or service is available from only one source.
- Competition has been solicited with no satisfactory offers received.
- Standardization or compatibility is the overriding consideration.
- The goods/services have been identified and/or required by a research grant or contract. The grant name and contract number must be provided on the Sole Source/Directed Source Justification form.

Supporting documentation should be provided to fully substantiate the conditions listed for justification of the Sole Source/Direct Source.

I. **Types of Purchase Orders and Forms**

**Non-Catalog Form**

When to use this form:

- To purchase goods and services not found in an EPRO catalog, from contracted and other suppliers.
• This form should also be used for contracted services, independent contractors/consultants, service and repair contracts and any other orders that have contracts associated with them. To avoid delays in your request, be sure to attach all necessary documentation to this form. This form is quantity driven. If a contract has multiple even payments, you may use this form.
• This form can be used for "confirmation only" type orders. Confirmation type orders are permitted only in a bona fide emergency situation. This type of PO will only be sent to supplier if you choose the "yes" option.
• Please note: You will need to enter "Einstein Procurement Department" as the supplier if you cannot find a supplier in the search or if it is a new vendor to be added.

Blanket Order Form

When to use this form:

A Blanket Order/Standing Order is a term contract or basic agreement between the College and a supplier. It is issued to a specific supplier to address recurring low-dollar purchases of consumable supplies or services, for a specific period of time. A Blanket Order is issued to support an existing contract, or independently, after all terms and conditions have been negotiated.

You must include the following information:

• The period to be covered by the blanket agreement (cannot exceed one calendar year)
• The previous Blanket Order number, if this is a replacement Blanket Order
• Items and/or categories of items to be covered by the Blanket Order (when available). In the case of a standing order, quantities and day/time of delivery are required
• Maximum quantities, if any
• Prices and pricing arrangements
• Blanking orders must be itemized

Request for Payment

• This form is to be used for payments to vendors only when use of a Purchase Order is not possible.
• Invoices, receipts or other supporting documentation must be attached to this form. Incomplete forms will be returned.
• Documentation must identify: Date of purchase, Name of vendor, Itemized list of goods, and the Total amount.
• For all types employee or student payments, please click the link below to be taken to the Employee/Student Payment form which is not a part of EPRO. http://www.yu.edu/procurement/accounts-payable/ap-forms/. Follow the instructions on the form for payment processing.

Guest Lecturer/Honorarium Authorization Request

• Use this form to obtain approval to present an honorarium or hire a guest lecturer. The definition of a "Guest Lecturer" shall include distinguished faculty, eminent or renowned individuals presenting lecturers, speeches, seminars, workshops, and performances.
• Do not use this form when services from Einstein staff, faculty members, or students are used.
Refrigerator/Freezer Safety

This form is for interdepartmental use only. This form must accompany any Non-Catalog or Blanket Order Form when requesting refrigerator/freezer commodities.

PO Change Request

- Use this form to request a change to a purchase order that has already been sent to the supplier.
- Only Procurement is authorized to issue a revision. In case of extensive changes, Procurement Services may choose to reproduce the complete information on the purchase order, in effect, canceling the original order.
- Changes may refer to price, quantity ordered, terms and conditions, delivery point, funding source, etc. As a result of these or any other changes, the accounting information may also have to be altered and the appropriate documentation sent to the Finance Department.
- A revision is issued only after the change has been agreed to verbally by the vendor and/or the requesting department. Issues that might require a revision include:
  - Request for a change received by a department or originated by Procurement
  - Request from vendor for change in the provisions of the purchase order
  - Any error (typographical or otherwise) discovered by any section Procurement

J. Einstein Automated Freezer Program/Alcohol Program

Einstein's Automated Freezer Program is a Consignment Program managed by the Science Division of Procurement. These freezers contain commonly used research items: reagents, kits, proteins, and more. This store is in the Belfer building room B12. The Central Stores Catalog is available via EPRO home page.


Register to gain access to the automated freezer program by sending an e-mail to aepurchasing@einstein.yu.edu Subject Line: Automated Freezer Program Registration. The e-mail must contain your phone #, your admin's name, PI and department name. An e-mail will come to you from the vendor you're registering with containing information on how to access the freezer. The vendors in the program are: Life Technologies, New England Bio, Bio-Rad, Promega, Denville, USA Scientific, Takara Bio, Goldbio, and Roche. For more information on how the program works, please call the freezer program administrator at 718-430-8884.

The Scientific Purchasing Manager is responsible for determining items placed in the various freezers run by the individual vendors. The decision will reflect what is most beneficial to the College based on size, quantity, and projected research direction.

1. Alcohol Program

The Alcohol program maintains an alcohol inventory ranging from pints to 5 gallon bottles and offers them "for sale" daily 9:00am-4:30pm. It also houses automated freezers, accessed 24 hours a day, 7 days a week. Use the Alcohol Request Form to order the item and desired amount. Once complete submit the cart to workflow. Once cart is approved the Freezer Program clerk will receive the requisition dispense
the alcohol, record the serial numbers in the requisition, and create a Purchase Order. Item will be
dispensed once end user comes to store to pick up item.

2. Alcohol Request Form

- This form is for interdepartmental use only. Please submit this form when requesting 190/200 proof Alcohol.
- Requestor originates alcohol order from specifying type and quantity.
- Necessary approvals secured. Order form is forwarded to Central Stores through EPRO.
- Requestor goes to Central Stores (Belfer B13) Alcohol Room to obtain product.
- Central Stores Clerk dispenses requested alcohol.
- Central Stores Clerk enters receipt data.

K. New Vendor Policy

Departments must submit current W-8BENE (foreign) or W9 form (domestic) with their requisition. Procurement will contact the vendor for them to fill out Einstein General Supplier Information Form (GSI). Einstein will run Dunn & Bradstreet (DnBi) report and enter them into K-Checks. If there's an issue with the vendor's DnBi report or if they're flagged on K-Checks, it will be brought to the attention of the AVP. Vendors performing work on site must provide a valid certificate of insurance with limits of liability as determined by Montefiore's Risk Management department, naming Albert Einstein College of Medicine, Inc. as additionally insured. The Contractor's insurance coverage shall be primary insurance as respect the College. Any insurance, self-insurance, or insurance pool coverage maintained by Albert Einstein College of Medicine, Inc., shall be excess of the Contractor's insurance and shall not contribute with it. The Contractor's insurance shall be endorsed to state that coverage shall not be cancelled by either party, except after thirty (30) days prior written notice by certified mail, return receipt requested, has been given to Einstein.

Disbarment

Albert Einstein College of Medicine's policy is to not procure goods or services or make contract purchases from an entity or individual listed on the Federal Government's Excluded Parties List System (EPLS) or to make a sub-recipient award to an entity or individual included on the EPLS.

Federal guidelines (FAR 9.405-2 and FAR 52.209-6) prohibit subcontracting of federal funds in excess of $25,000 to an organization or an individual who is debarred, suspended, or proposed for debarment, unless there is a compelling reason to do so. Any transactions proposed with a federally debarred, suspended or proposed for debarment entity or individual must be approved by the AVP as administrator of this policy. In addition, the College may prohibit the use of certain vendors if past experience, legal action, or other factors warrant exclusion.

Procurement will review all vendors monthly, comparing the list of vendors with whom the College does business with against the Federal Government's list of debarred or suspended vendors. In the event that a vendor upon initial set up or who is doing business with the College is found to be debarred or suspended by the Federal Government, it should be brought to the immediate attention of the AVP and Procurement will place any Purchase Orders and/or Invoices on holds. Any debarred or suspended vendor will be immediately removed from the Procurement Vendor File and precluded from doing business with the College until the suspension or disbarment has been resolved.
L. Additional Policies

1. Employment Agency

Einstein to better meet our hiring needs and ensure clarity in our business transactions with external vendors, we have adopted the following employment agency policy. It is important that you read this policy before contacting us. We do not accept resumes from agencies unless:

- There is a signed agreement between the agency and Einstein is in place, and
- Our Human Resources department has authorized the agency to submit a resume for a specific position.

If an agency submits unsolicited resumes, Einstein is not obligated to pay a fee if we hire from these unsolicited resumes.

Any unsolicited candidate information disclosed to Einstein by an agency may be used by Einstein in whatever manner it deems appropriate without compensation to the agency. In addition, if there is no signed agreement between Einstein and an agency, the opening of an unsolicited e-mail or any other communication and/or Einstein's response to any such communication will not obligate Einstein to the agency in any way or require the payment of a fee in connection with any resume received by Einstein.

If your agency is interested in being considered for Einstein's Approved Employment Agency Vendor list, please email the following information to careers@einstein.yu.edu:

- Agency name
- Contact information
- Location
- Agency references
- Area of specialization and a description of products and services, especially those that differentiate your organization

IV. Definitions

None.

V. Effective Date

Effective as of: 5th day of February 2018.

VI. Policy Management and Responsibilities

Einstein's Procurement Services department is the Responsible Office under this Policy. Einstein's Associate Dean for Finance and Administration is the Responsible Executive, and Einstein's Associate Vice President for Business Services is the Responsible Officer for the management of this policy.

VII. Approved (or Revised)

[Signature]

Jed M. Shivers
Associate Dean for Finance and Administration

26 Mar '18

5 February 2018