

**State of Vermont**  
**Agency of Natural Resources**  
**Department of Environmental Conservation**  
**Environmental Compliance Division**

|                               |  |                        |                   |
|-------------------------------|--|------------------------|-------------------|
| <b>Financial Process:</b>     | <b>ECD Purchasing Policy</b>                     | <b>Issue Date:</b>     | <b>2/4/2021</b>   |
| <b>Topic:</b>                 | <b>Internal Control</b>                          | <b>Effective Date:</b> | <b>2/4/2021</b>   |
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### **Policy Objective**

This policy has been created to adhere to the [DEC Purchasing Policy](#) and to ensure the rules and regulations governing purchasing of goods and services as well as the payment of invoices are followed. Purchasing must be approved in advance according to this policy. All invoices must follow the vendor's terms and conditions to prevent suspension of accounts for non-payment.

The objective of this policy is to provide clear written guidance to the Environmental Compliance Division (ECD) on the procurement process. This process is to ensure that all purchases are allowable, allocable, reasonable, and necessary; that there are no improper charges to the ECD budget; no excessive costs are incurred; payments are not made for items or services not provided; and goods are not purchased for personal use.

This procedure addresses staff responsibilities ("separation of duties"), key activities, and timelines and follows the DEC Purchasing Policy and the Office of Purchasing and Contracting's [Buyer's Resource Guide](#).

### **Types of Purchases**

Types of purchases include:

- [General Purchase of Goods or Commodities](#)
- Goods or Commodities Under [\\$10,000](#)
- Goods or Commodities Over [\\$10,000](#)
- [IT Purchases](#)
- [Cellphones and Cellphone Accessories](#)
- [Food & Beverage Purchases](#)
- [Memberships](#)
- [Vehicles and Gas](#)
- [Services](#)
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## **Risks**

Risks include:

- Unauthorized purchases are made, which could cause budget issues
- Invoices are not paid in a timely manner, which could prevent future purchases

## **Guidelines**

All purchase requests shall be routed to an ECD Supervisor (the Environmental Assistance Office (EAO) Program Manager for Assistance, the Chief Environmental Enforcement Officer (CEEEO) for Enforcement, or the ECD Director for Division-wide or either program) for review and approval.

The EAO Program Manager (when applicable), CEEEO (when applicable), ECD Director, and ECD Administrative Services Coordinator will coordinate to review and approve the requested purchase, process and order the purchase request, and code and upload the invoice in a timely manner. Generally, the EAO Program Manager and CEEEO can approve requests under \$500 without review from the ECD Director. Purchases over \$500 should have review and approval from the ECD Director.

All invoices shall be routed to the ECD Administrative Services Coordinator or an ECD Supervisor for processing.

AID Financial Operations maintains the [list of ECD Authorized Signers](#). ECD's authorized signers should include: the ECD Director, the EAO Program Manager, the CEEEO, and the ECD Administrative Services Coordinator.

Additional DEC guidance and documentation can be found on the [Financial Operations site](#).

### **General Purchase of Goods or Commodities**

Below is a summary of purchasing requirements. Please refer to the DEC Purchasing Policy for more detail if needed. General requirements include:

1. All purchases must be approved by an Authorized Signer, excluding exemptions provided in this policy.
2. Purchases of \$500 to \$9,999 require 3 price quotes. Allowable quotes include email quotes, catalogues, and internet searches. These items do not have to be submitted to AID Financial Operations.
3. Purchases of \$10,000 or more require 3 price quotes and must be submitted to AID Financial Operations via ANR Online. This purchase may require a contract or purchase order.

### ***Statewide Contracts***

Before any item is purchased, ECD must first check to see if the item is available through a state contract on the [Statewide Contract List](#). If a good or service is available through a state contract, it must be purchased through the contracted entity, even if it can be purchased from somewhere else at a lower price.

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Exceptions can apply for certain situations. After an ECD Supervisor has approved a purchase, they will send notice to the ECD Administrative Services Coordinator to review the statewide contract list for the item. If the item is under contract, ECD will purchase the item through the contract. The ECD Administrative Services Coordinator will draft a purchase requisition on [ANR Online](#) for the ECD Supervisor to approve and submit.

#### Goods or Commodities Under \$10,000

For any item under \$10,000, the ECD staff member will make a request to their Supervisor. For Assistance, Enforcement, or general division purchases, the ECD Director can review and approve the purchase. For Assistance and Enforcement purchases under \$500, the EAO Program Manager and CEO can review and approve the purchase for their respective program. For purchases over \$500, the EAO Program Manager or CEO will coordinate with the ECD Director. This will include the process of receiving and maintaining three quotes as described above. If an ECD Supervisor approves the purchase, the ECD Administrative Services Coordinator will complete the order.

Common goods and commodities under \$10,000 include:

- Office Supplies – Most office supplies can be purchase through the [state’s contract](#) with [WB Mason](#). A purchase requisition is not required to order from WB Mason. The ECD Administrative Services Coordinator can order directly from the site.
- Business Cards, Envelopes, and Printing – Business cards, envelopes, and printing shall be done in accordance with the [Print Procurement Requirements](#). Vermont Correctional Industries (VCI) and Building and General Services (BGS) are to be the first choice for all printing jobs. The [VCI Print Shop](#) is used for business cards and envelopes, and the [BGS Print Shop](#) is used for booklets, trifold, newsletters, etc. A purchase requisition is required for these goods.
- Phone Cases – Phone cases can be purchased on [Amazon](#). This can be ordered from the ECD Amazon account with the purchasing card.
- Office Furniture – Most office furniture including chairs, shelving, file cabinets, etc. can be purchase through the [statewide contracts](#). A purchase requisition is required for these items.
- Non-ADS IT Supplies – Some non-ADS IT supplies (flash drives, specialty keyboards and mice, etc.) can be purchased through WB Mason. If the supply is not available through WB Mason or another state contract, it can be ordered on [Amazon](#). This can be ordered from the ECD Amazon account with the purchasing card. ECD currently has a drawer of cameras from a grant received several years ago. These should be used up before new cameras are purchased.
- Boots – Boots shall be purchased in accordance with [DEC’s Safety-Toe Footwear Policy](#). If an ECD staff member needs new boots, they shall contact their Supervisor for review and approval. Once approved, the ECD staff member shall follow the guidance and fill out the required forms on the [DEC Health and Safety-Toe Footwear Page](#).
- Personal Protective Equipment (PPE) – Most PPE can be ordered through WB Mason. If an item is not available through WB Mason, the [statewide contracts](#) should be checked for the item. Current contracts include face shields, hand sanitizer, gloves, masks, etc. A purchase requisition is likely required for these items.

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- Local Store Purchases – DEC has charge accounts at a few local stores. If an ECD staff member would like to purchase an item from a local store, they shall contact their Supervisor prior to the purchase. If approved, the ECD staff member must legibly write their name and ECD in the store’s log. The ECD staff member also needs to receive a copy of the receipt/invoice and email it to the ECD Administrative Services Coordinator.
- State-Issued Vehicle Supplies/Parts – Vehicle part/supply purchases shall first be run through BGS Fleet Services to check whether they will cover and purchase the item. ECD Supervisor preapproval is not required when the fiscal year (July to June) running total for an ECD staff person purchasing routinely replaced or emergency vehicle parts/supplies for a state issued vehicle is under \$250. All other purchase requests for vehicle parts/supplies should be routed to an ECD Supervisor for review and approval.
- Offering an Event or Training – If an ECD staff member would like to offer an event or training that will cost money to hold, they shall contact their Supervisor for review and approval. The ECD Supervisor will coordinate with the ECD Director (if applicable) and ECD Administrative Services Coordinator regarding room rentals, food and beverage purchases, and other related costs.
- Attending an Event or Training – If an ECD staff member would like to attend an event or training that will cost money, they shall contact their Supervisor for review and approval. Depending on the host, the purchase can either be made through a currently set up vendor, setting up a vendor, or with the ECD Purchasing Card. The purchasing method should be discussed with the ECD Administrative Services Coordinator. If an event or training requires travel, see the Travel section below.
- Enforcement Action Related Purchases – At times, ECD needs documents served by a Sheriff, to retrieve land records, or to file documents in the land record within a town. All VT Sheriffs and Towns are existing vendors with the State of Vermont. If an ECD staff member needs any of these services, they shall contact their Supervisor for review and approval. If approved, the ECD Administrative Services Coordinator will have the documents served/filed and process the invoice.
- Supplies Not Under Contract – If a supply is not under contract, it can typically be purchased from a vendor of ECD’s choice using the purchasing card (e.g., dye to testing on-site wastewater systems). The choice of vendor should be discussed with an ECD Supervisor and the ECD Administrative Services Coordinator.

#### Goods or Commodities Over \$10,000

If it is anticipated that a total purchase will exceed \$10,000, prior to the purchase, a purchase requisition form must be submitted via ANR Online with a minimum of 3 quotes. AID Financial Operations will submit this request to BGS via the ANR Central Office (ANR CO). BGS may post this request for a competitive bid or approve the purchase from the vendor quotes. BGS Purchasing Staff will then select the vendor and create a contract or purchase order to be used for the purchase. The purchase cannot be made until a contract or purchase order has been approved by BGS with a selected vendor.

If an ECD staff member would like to make a purchase over \$10,000, they shall send the request to their Supervisor. The EAO Program Manager or CEEO will coordinate with the ECD Director for approval.

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If approval is received from the ECD Director, the ECD Administrative Services Coordinator will complete the purchase requisition form on ANR Online.

### IT Purchases

All IT purchases must be done through ANR IT/ADS. This includes any item that plugs into a computer, wirelessly connects to a computer, or transfers and/or stores data, including but not limited to computers, tablets, docking stations, printers, scanners, projectors, software, computer batteries, cable adapters, and monitors. Items that do not need to go through IT include specialty computer mice and keyboards (ergonomic, wireless, etc.), thumb drives, and cameras.

For items that need to go through IT, the ECD staff member will request the item with their Supervisor. The EAO Program Manager or CEEO will coordinate with the ECD Director and ANR IT/ADS to order the item.

For items that do not need to go through IT, the ECD staff member will request the item through their Supervisor. If approved, the ECD Supervisor will coordinate with the ECD Administrative Services Coordinator to order the item using the applicable Purchase of Good or Commodities process above.

### Cellphones and Cellphone Accessories

All cellphone and cellphone related purchases (including charging cables) must be done through the ANR CO to be ordered on the State Contract.

If an ECD staff member needs a new phone or charging cable, the ECD staff member will request the item through their Supervisor. The EAO Program Manager or CEEO will email the ECD Director with the reason for the new phone, requested phone model, and the staff member's name that needs the phone. After receiving approval from the ECD Director, the ECD Supervisor or ECD Administrative Services Coordinator will email the ANR CO with the request.

Phone cases do not need to be ordered through the ANR CO and can be ordered using the applicable Purchase of Goods or Commodities process above.

### Food & Beverage Purchases

Any decision to provide food and refreshments must be approved in advance by the ECD Director and the DEC Commissioner prior to the obligation of funds and be done in accordance with the [DEC Food & Beverage Policy](#) and the [Department of Finance and Management's Policy #4.0](#). This policy does not apply to meals or expenses incurred by individual employees while in a travel status; travel-related expenses are addressed under the [Agency of Administration's Bulletin #3.4: Travel-Related Expenses](#).

If an ECD staff member would like to provide food and beverages at an event or training, they shall request their Supervisor for review and approval of the purchase. After review and approval, the ECD Supervisor

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will contact the ECD Administrative Services Coordinator to draft a memorandum for the ECD Director and DEC Commissioner to sign as approval.

The ECD Administrative Services Coordinator will provide the signed memorandum, a list of all attendees, and the invoice for the food and beverages in the final processing of these requests.

### Memberships

Memberships to professional organizations require a memorandum signed by the DEC Commissioner. The memorandum shall include an explanation of the organization and a justification as to why ECD staff should be members and any benefits received from the membership.

If an ECD staff member would like to join a professional organization, they shall contact their Supervisor for review and approval. After review and approval, the ECD Supervisor will contact the ECD Administrative Services Coordinator to draft a memorandum for the ECD Director and DEC Commissioner to sign as approval.

Note certifications are not memberships and if required for the position, justification is not required. ECD staff members shall contact their Supervisor for review and approval related to certifications.

### Vehicles and Gas

The purchase of vehicles, vehicle services, and tires are under [state contract](#). If an ECD staff member requires a new vehicle, vehicle services, or tires, they shall contact their Supervisor.

The ANR CO maintains registrations for vehicles and will provide them to the ECD Supervisors to distribute to staff.

ECD staff members purchase gas for state vehicles through a Universal Fuel Card. If an ECD staff member needs a new or replacement gas card, they shall contact their Supervisor.

The EAO Program Manager or CEEO will coordinate with the ECD Director as needed regarding vehicles and gas.

### Services

“Services” is a term that is broadly interpreted and includes personal and professional services including construction, consulting, design and engineering, investment management, Information Technology activities, real estate services, and the maintenance of equipment.

All contracts regardless of amount are administered by a Grant Management Specialist in AID Financial Operations and are governed by the applicable State law, policies, and procedures as set forth in [Agency of Administration Bulletin #3.5](#).

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If an ECD staff member requires a service from an external entity, they shall contact their Supervisor for review and approval. Once approved, the ECD Administrative Services Coordinator will coordinate with a Grant Management Specialist about the request.

*Please note this section does not apply to funding related to the American Rescue Plan Act Healthy Homes Program (ARPA HH). The ARPA HH Program will follow its own policies related to awards and funding.*

#### Lab Services

If an ECD staff member requires a lab service (such as water sampling), they shall contact their Supervisor for review and approval. The ECD Supervisor will determine whether to receive these services through the [Vermont Agricultural and Environmental Lab](#) or through VT DEC's contract with [Endyne, Inc.](#) ECD will coordinate as required with a Grant Management Specialist in AID Financial Operations.

#### Travel

Travel Authorizations must be fully approved by the EAO Program Manager, the CEEO, and/or the ECD Director prior to any purchase relating to travel. Allowable Travel purchases include airfare, lodging, registration, car rental, tolls, car fares, internet charges, and meals (per the state meal allowances). Unallowable Travel purchases include movies, gift shop, other hotel services, hotel bar, alcohol, and snacks (unless within your daily meal allowance amounts). If an ECD staff member needs to travel for work or a training, they shall contact their Supervisor for review and approval.

When travel is related to a training, the travel must be approved on either an Instate Training Form or an Out of State Travel Request form on the [AID Financial Operations Page](#). All out of state travel requires filling out the Out of State Travel Request form well in advance.

Whenever possible, all travel arrangements should be made with a Division or DEC Purchasing Card. All expenses require all the receipts to be submitted when returning from the travel or a lost receipt form will need to be completed for each item that does not have a receipt.

For purchases relating to travel that were not made on a Purchasing Card, an ECD staff member will need to submit an Employee Expense Reimbursement Request in Vision. All receipts, agenda, approved travel authorization form, and any additional required documentation must be attached to the expense report to receive reimbursement.

#### Federal Grant Funds

The Department is responsible for the efficient and effective administration of a Federal award through the application of sound financial management practices. Eligible costs under a Federal award are those costs considered necessary and reasonable for the performance of the Federal award and allocable under the Uniform Guidance Costs Principles ([2 C.F.R. Part 200 Subchapter E](#)). Terms and conditions related to the award may have more detailed cost eligibility requirements and should be reviewed in advance of developing a proposal budget.

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Purchases paid for by Federal Grant Funds must be included in the grant budget approved by the Federal Agency. The purchase will need to be reviewed and approved by a Grants Management Specialist in AID Financial Operations. AID Financial Operations staff responsible for Accounts Payable will add an approval step for the Grants Management Specialist when processing a purchase requisition or invoice paid for by a Federal grant.

Note Federal Grant Funds should only be used for purchases specified as a line item in the grant and not all grant eligible purchases.

If Federal Grant Funds are to be used for an ECD purchase, the ECD staff member responsible for the purchase shall contact their Supervisor for review and approval of the purchase.

After receiving ECD Director approval, the ECD Administrative Services Coordinator will send the request to the AID Grants Management Specialist to ensure the funds can be appropriated for the purchase and for their final review and approval.

*Please note this section does not apply to funding related to the American Rescue Plan Act Healthy Homes Program (ARPA HH). The ARPA HH Program will follow its own policies related to awards and funding.*

#### “RUSH” Orders

The term “RUSH” should only be used due to unforeseeable circumstances. Lack of planning is not an unforeseeable circumstance. “RUSH” orders still require all applicable purchasing processes to be followed.

When a “RUSH” order is required, the ECD staff member shall contact their Supervisor for review and approval of the purchase.

When the purchase request is approved, the ECD Supervisor shall contact the ECD Administrative Services Coordinator, who will email AID Financial Operations at [ANR.DECAP@vermont.gov](mailto:ANR.DECAP@vermont.gov) with the purchase request as well as the reason for the “RUSH” order.

#### Natural Disaster Related Emergency Purchases

During a natural disaster or other disruptive event, all regular purchasing guidelines should be followed. Special purchases that fall outside the usual guidelines should only be made with the written approval of the ECD Director or appointing authority. In the event of a natural disaster or other disruptive event, staff will be notified using the ANR Emergency Alert Notification system and any special purchasing instructions will be provided.



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### Advertising and Marketing

If an ECD staff member is planning a marketing or outreach campaign, they shall contact their Supervisor for review and approval.

The term “marketing” includes advertising (print, radio, television, and web/internet but not employee recruiting); collaterals (brochures, fact sheets, folders, etc.); website design (not to include technical components); trade shows and events; direct mail campaigns; and sponsorships. The Chief Marketing Office (CMO) provides marketing services for all of state government, including DEC.

If an ECD marketing or outreach project needs outside help, the CMO can help decide if a Master Marketing Contractor or a Pre-Qualified Marketing Vendor might be the best fit. The CMO has master contracts in place for Creative Services, Media Buying, and Photography available to all state entities and can provide some guidance on navigating the RFP and contracting process. Involving the CMO from the beginning of any project ensures that all are on the same page and that ECD does not have to revise creative materials or contracts down the road. If a marketing or outreach project cost exceeds \$25,000, the CMO is required to approve by [Agency of Administration Bulletin #3.5](#).

Advertising purchases such as movie theater advertising, radio advertising, bus advertising, etc. are considered “services.” If ECD is not purchasing these services through the Media Placement Statewide Contractor, a competitive procurement must take place, including a contract on a State-template signed by both parties.

### **Purchasing Card**

An ECD Supervisor or the Administrative Services Coordinator shall hold the purchasing card for the Division. All purchases made with a purchasing card shall receive approval from an ECD Supervisor prior to purchase.

Additional guidelines for the use of [Purchasing Card](#).

### **Receipt of Purchased Items**

If possible, all orders should be shipped to the ECD Administrative Services Coordinator.

Once an order has been received, the receiver needs to review the order to make sure everything was received, if an item is on backorder or was shipped separately, and if the prices listed match the order. Once this review is complete, the receiver signs the packing slip and provides the slip (paper or electronic) to the ECD Administrative Services Coordinator. If there is no packing slip, the receiver sends an email to the ECD Administrative Services Coordinator stating the review is complete and all items were received.

The ECD Administrative Services Coordinator will sign and code the packing slip then upload the document to the [DEC Accounts Payable SharePoint site](#).

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## **Invoice Processing**

All invoices (paper or electronic) must go to the ECD Administrative Services Coordinator for processing. The invoice must include the vendor information, the items, prices, date, and invoice number (if possible). Items not considered an invoice include statements, packing slips, delivery tickets, no invoice, copy stamp, quote, or estimate.

The ECD Administrative Services Coordinator will use the following guidelines when approving an invoice:

- Verify the invoice is valid.
- Review the vendor name and address is on the invoice
- Check to see the invoice is addressed to State of Vermont, ANR, DEC, or ECD
- Make sure there is an invoice number and date (if there is no number then the date can be used as the invoice number)
- Review the billed goods/services have been satisfactorily received
- Review all documentation is attached (e.g. packing slip, purchase requisition, etc.)
- Make sure the invoice is fully itemized including a description of services performed with a date or date range, items purchased, quantity, price per unit, and total amount of each item (32 V.S.A. §463)
- Verify that Vermont state sales tax has not been charged. If it has been charged, DEC will contact the company and tell them we are tax exempt. If a new invoice cannot be obtained, process the invoice as normal and subtract the tax from the total to be paid. The tax-exempt form can be found [here](#).
- If it is a grant/contract invoice, verify it meets the criteria as outlined in “Attachment B – Payment Provision” of the agreement.
- Code the invoice using the coding sheet on the [DEC SharePoint site](#) and include the contract and purchase requisition number if applicable

If an invoice is not associated with an existing vendor in Vision and has not been paid for by a purchasing card, the ECD Administrative Services Coordinator will contact AID Financial Operations to get the vendor added. ECD will need to request the vendor provide a W-9 signed within the past 6 months for the setup.

After the invoice is approved, the ECD Administrative Services Coordinator will upload the invoice to the [DEC Accounts Payable SharePoint site](#) as one PDF document.

If a vendor discount is available, this information will be added as a comment when uploading the invoice to the DEC Accounts Payable SharePoint site to change payment terms to net 0 to obtain the discount.

*Please note this section does not apply to funding related to the American Rescue Plan Act Healthy Homes Program (ARPA HH). The ARPA HH Program will follow its own policies related to awards and funding.*

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### **Returns and Vendor Credit Memos**

If an item received is not correct or damaged, the ECD staff member will let the ECD Administrative Services Coordinator know about the issue including the reason for the return. The ECD Administrative Services Coordinator will contact the vendor and send the item back to the vendor per the vendor's policy and procedure. The ECD Administrative Services Coordinator will make a copy of the return packing slip and upload it to the [DEC Accounts Payable SharePoint site](#).

### **Debarment and DEC Exclusion List**

ECD shall ensure that the Department does not contract, directly or indirectly, with entities or individuals that are suspended or debarred by the Department, State of Vermont, or Federal Government.

The ECD staff member making the purchase shall check the [DEC Exclusion List](#) and [BGS Debarment List](#) before making a purchase.

### **Timelines**

ECD should approve or deny all purchase requests within 5 business days. If the request is approved, next processing steps should be completed within 5 business days.

For items requiring an ANR Online purchase requisition form, it generally takes up to an additional 10 business days for AID to process the order.

If an item needs to go out to bid, it needs to be posted for a minimum of 10 days before selections are made.

A sole source request requires a justification memorandum and depending on the amount (amount determines who needs to approve the sole source) could take up to 2 months to go through the process with no guarantee of approval. Sole source requests are very highly scrutinized, and the bar to get approval is high.

After an item has been ordered, the timeline for receipt is dependent upon the vendor.

### **Notices**

- This policy is intended to support the Agency of Natural Resources internal control environment.
- In consideration of this policy, the objective should be on adherence and not on rationalizing ways and means for circumvention.
- Nothing in this document is binding or shall limit or supersede any applicable Federal or State law, statutes, bulletins, or regulation.

|                               |   |                        |                   |
|-------------------------------|---|------------------------|-------------------|
| <b>Financial Process:</b>     | <b>ECD Purchasing Policy</b>                    | <b>Issue Date:</b>     | <b>2/4/2021</b>   |
| <b>Topic:</b>                 | <b>Internal Control</b>                         | <b>Effective Date:</b> | <b>2/4/2021</b>   |
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Revisions

*5/26/2021: Added State-Issued Vehicle Supplies/Parts bullet to Goods or Commodities Under \$3,500 Section.*

*02/03/2023: Added the EAO Program Manager as an ECD Supervisor throughout the document, added Supplies Not Under Contract bullet to Goods or Commodities Under \$3,500 Section, and added exclusion for ARPA HH Program related to grants and contracts.*

*10/04/2023: The Dept of Building and General Services gives Blanket Delegation of Authority to Agencies and Departments to purchase items that were not foreseen to be needed as a normal course of business. Up until now, the limit on these purchases was \$3,500 per item. The new limit for these purchases is now \$10,000. ECD Purchasing Policy was updated to reflect this threshold change (i.e. all sections that listed \$3,500 as the limit for purchases were changed to \$10,000).*