



Chicago Metropolitan
Agency for Planning

CMAP Procurement Policy



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Article 1: Overview

Promulgation:

The procurement rules outlined herein have been promulgated and approved by the Board of the Chicago Metropolitan Agency for Planning (CMAP). These procedures govern all procurement activities undertaken by CMAP, ensuring compliance with local, state, and federal regulations. These rules are subject to periodic review and updates, with changes approved by the CMAP Board. This document shall be known and cited as the "Chicago Metropolitan Agency for Planning Procurement Policy" or "CMAP Procurement Policy".

Purpose:

The purpose of this policy is to ensure the responsible, effective, and transparent use of public funds while ensuring compliance with federal, state, and local procurement regulations. The policy is designed to uphold CMAP's mission and vision for regional planning, emphasizing fairness, accountability, and integrity in all procurement processes. This policy is intended to guide CMAP's procurement staff, contractors, subrecipients, and vendors in adhering to federal and state regulations, as well as CMAP's specific organizational requirements.

Article 2: Definitions

The foundation of CMAP's procurement framework begins with clearly defined procurement terminology and parties involved. These definitions align with federal standards found in **FAR 2.101**, **2 CFR 200**, and relevant sections of the **Illinois Procurement Code (30 ILCS 500/1-15)**. The clarity provided by clearly defining roles and responsibilities reduces the risk of misclassification and strengthens accountability across all procurement actions.

- 1. CMAP Board of Directors (CMAP Board):** The CMAP Board acts as oversight for procurement activities and CMAP Procurement Policy. CMAP Board approval is required for contracts exceeding the established acquisition threshold.
- 2. Executive Director (ED):** Serves as Contracting Officer and has signatory authority for all agency contracts. The ED has an overall responsibility for ensuring that CMAP's procurement activities are aligned with CMAP's strategic goals and comply with applicable regulations. The ED holds the authority to approve contracts within established financial thresholds, with higher-value contracts requiring approval from the CMAP Board.
- 3. Procurement Officer:** Responsible for CMAP's day-to-day procurement activities

CMAP's day-to-day procurement activities, including facilitating solicitation activities of the agency to ensure that all contracts and procurement activities comply with applicable federal, state, and local laws. Responsible for overseeing the entire procurement process, approving procurement methods, and ensuring compliance with laws and regulations.

4. **Project Management Team (PM Team):** Responsible for assigned projects' procurement related activities within their respective division such as creating purchase requisition (PR), preparing project's scope of work, conducting RFP/ITB conferences, obtaining quotes, evaluating proposals, and generating justification memos for vendor selection.
5. **Project Manager:** Facilitates and coordinates the activities involved in project completion. The Project Manager is the main source of contact for project related comments, questions, and concerns.
6. **Program Managers:** Oversees Project Manager. Approves project scope statement, D365 purchase requisitions, and signs off on all procurement requests initiating purchasing activity for planned projects. Program Managers are responsible for overseeing the procurement activity of the Project Manager on their assigned projects. They are accountable for and ensure that procurement activities align with the project's objectives and comply with this policy.
7. **Executive Sponsor:** High level member of the project team accountable for ensuring required resources are available for project and that all project initiatives are in alignment with CMAP's strategic goals and objectives.
8. **Contractor:** A contractor is an individual who provides specific services in the short term with defined criteria and milestones.
9. **Vendor:** A seller of goods or services whereby the exchange is solely transactional. "Supplier" is the preferred term when a longer-term or strategic relationship is involved.
10. **Subrecipient:** An entity that receives a subaward from a pass-through entity to carry out part of a federal award. The term subrecipient does not include a beneficiary or participant. A subrecipient may also be a recipient of other Federal awards directly from a federal agency.
11. **Formal Solicitation:** The procuring of goods or services advertised to the public with the intention of receiving bids/proposals.

12. **Informal Solicitation:** The procuring of goods or services without public advertisement.
13. **Acquisition Threshold:** Maximum aggregate amount to procure goods or services assigned to different types of procurements.
14. **Emergency Procurement:** The purchase of goods or services to remedy immediate adverse activity to business operations. Does not require competition. Requires justification and proper documentation.
15. **Protest:** A challenge to the award or proposed award of a contract for the procurement of goods and services or a challenge to the terms of a solicitation for such a contract.
16. **Debarment:** Debarred entities are prohibited from contracting with CMAP. Any agency receiving government funding, and electing to do business with a debarred vendor, jeopardizes their eligibility for continued funding.
17. **Freedom of Information Act (FOIA):** United States federal and state law that grants the public the right to access government records, with some exceptions, and is a cornerstone of transparency and accountability.
18. **Regulatory Framework:** Rules, regulation, and processes established by internal and external governing bodies responsible for setting and enforcing obligations pertaining to government spending, including sub-award recipients.
19. **Simplified Acquisition Threshold:** The maximum dollar amount that may be spent on purchases without requiring CMAP Board approval.
20. **Decentralized Procurement:** Business units can make procurement decisions and enter vendor work relationships with the approval of the ED.
21. **Independent Cost Estimate:** Term that generally refers to the cost estimate for a pending project that reflects anticipated project costs for budgetary funding purposes, etc.

Article 3: General Provisions

This policy establishes the principles, guidelines, and procedures governing procurement activities at the Chicago Metropolitan Agency for Planning (CMAP). The authority for this policy is derived from the **Federal Acquisition Regulation (FAR), 2 CFR 200 (Uniform Guidance)**, and the **Illinois Procurement Code (30 ILCS 500)**. To provide compliant,

transparent and ethical procurement activities, CMAP will adhere to the specified laws, regulations, guidelines, and standards listed below.

- 1. Illinois Procurement Code (30 ILCS 500)**
 - a. Governs all public procurement activities in Illinois, with strict rules regarding competitive bidding, contract administration, and ethical standards.
- 2. Illinois State Officials and Employees Ethics Act (5 ILCS 430)**
 - a. Applies to improper influence or conflicts of interest.
- 3. Illinois Administrative Code (44 Ill. Adm. Code)**
 - a. Concerning confidentiality, disclosure, vendor questions, and clarifications.
- 4. 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards**
 - a. Applies to federal funding and establishes procurement standards to ensure that the procurement process is transparent, cost-effective, and compliant with federal grant conditions.
- 5. Federal Acquisition Regulation (FAR)**
 - a. Governs federal procurements and provides guidance on contract types, procurement methods, and contract administration.
- 6. American Bar Association Model Procurement Code**
 - a. A set of guidelines for ethical and transparent procurement practices, often referenced by state and local governments.
- 7. Governmental Accounting Standards Board (GASB)**
 - a. An independent, private-sector organization that establishes and improves accounting and financial reporting standards for U.S. state and local governments. These standards are known as Generally Accepted Accounting Principles (GAAP) for state and local governments. Offers guidance on financial reporting and accountability, including procurement transactions.

Article 4: Organization and Delegation of Authority

CMAP is a legislatively enabled Metropolitan Planning Organization and is funded primarily through taxpayer resources. A Metropolitan Planning Organization (MPO) is the policy board of an organization created and designated to carry out the metropolitan transportation planning process. MPOs are required to represent localities in all urbanized areas (UZAs) with populations over 50,000, as determined by the U.S. Census. Due to the

nature of work provided by the CMAP, procurement is decentralized through a structured delegation of authority.

CMAP by-laws, article seven, grants the Executive Director the authority to enter into contractual commitments where the total of the compensation provided under such commitment does not exceed the annually adjusted Simplified Acquisition Threshold for professional and artistic services as established under the Illinois Procurement Code (30 ILCS 500/20-20).

Powers of the Executive Director

1. In addition to those powers provided by law, ordinance or resolution of the Board, the Executive Director:

- A.** shall hire deputy directors and other employees as needed.
- B.** shall have the authority to enter into contractual commitments where the total of the compensation provided under such commitment does not exceed the annually adjusted Simplified Acquisition Threshold for professional and artistic services as established under the Illinois Procurement Code (30 ILCS 500/20-20).

Procurements shall not be artificially divided to constitute a small purchase eligible to this provision of the Illinois Procurement Code. Contracts with a total value exceeding the simplified acquisition threshold require CMAP Board approval, while smaller procurements may be approved by the ED.

All procurement activities are conducted by the Procurement Officer or dedicated procurement staff. The PM Team, in addition to all other agency staff, is not permitted to engage with potential bidders or anyone else about project specific details during open solicitations. Such activities jeopardize the fairness of and transparency of open and fair competition practices.

Employees other than Procurement or specified staff are not authorized to negotiate agreements or the expenditure of any purchase, unless specifically approved by the appropriate Executive Sponsor. The person acting as purchasing agent will be responsible for investigating, negotiating and recommending the execution of a contract or the purchasing of supplies, general services and equipment. The assignment as purchasing agent depends on the type of procurement.



Article 5: Source Selection, Contract Formation, and Administration

CMAP utilizes a range of procurement methods depending on acquisition thresholds and funding type. As guided by **2 CFR 200.320, FAR Parts 13–16, and 30 ILCS 500/20**, procurement options include micro-purchases (under \$30,000), small purchases (under \$250,000), and competitive solicitations for higher-value contracts. Source selection is conducted through sealed bidding or competitive proposals depending on the nature of the contract. CMAP conducts cost and price analysis where required, maintains detailed procurement records, and ensures solicitations are posted publicly when thresholds are above \$30,000. Contract formation includes negotiation by Program Manager, review by Procurement Officer, and execution by the Executive Director. Amendments, renewals, and extensions must follow CMAP's internal approval process and applicable state or federal rules, including justification documentation for material changes. Contract extensions beyond the original term must comply with **30 ILCS 500/20-60, FAR 52.217**, and must not be used to circumvent competitive bidding requirements.

Article 6: Authorization and Procedure to Provide Services to MPO Members

CMAP collaborates extensively with partner governmental agencies through shared planning initiatives, technical assistance, and program implementation. To facilitate this, CMAP enters into Intergovernmental Agreements (IGAs), Memoranda of Understanding (MOUs), and subrecipient agreements. All agreements are executed in accordance with **2 CFR 200.331**, which mandates that CMAP evaluates each relationship to determine whether the partner is a contractor or subrecipient. These agreements outline deliverables, financial terms, reporting responsibilities, and compliance requirements. IGAs and MOUs are reviewed by the Procurement Officer and must be authorized by the Executive Director or the CMAP BOD based on the contract value and strategic significance. Coordination with IDOT is required on federally funded transportation initiatives, and CMAP follows IDOT's grant procedures for procurements under its oversight.

Article 7: Surplus Property

CMAP maintains an accurate inventory of property and equipment purchased with federal or state funds, ensuring that items are tracked, used appropriately, and disposed of properly. Disposition of surplus property complies with **2 CFR 200.313(d)** for federally funded equipment, and **FAR Part 45**, when applicable. The agency follows state surplus



property procedures for disposition, in accordance with **30 ILCS 500/50-40 to 50-45**, including transfer to other government units or public auction when permitted. All disposal actions are documented and reviewed to ensure compliance with grant closeout and audit requirements.

Article 8: Debarment and Suspension Procedures

To protect the integrity of its procurement process, CMAP verifies that all contractors and subrecipients are eligible to receive federal and state funds. This includes a mandatory check of the System for Award Management (SAM.gov) as required under **2 CFR 180 and 2 CFR 200.214**, and review against state debarment lists pursuant to **30 ILCS 500/50-65**. Documentation of these checks is retained in the procurement file prior to contract execution. Any party found to be debarred, suspended, or otherwise excluded will be ineligible to contract with CMAP, and this exclusion extends to subcontractors and affiliates.

Article 9: Vendor Protest Procedures

CMAP maintains a transparent, accessible process for vendors to protest solicitation outcomes or contract awards. Vendors must submit protests in writing within the timeframe stated in the solicitation. The protest must clearly state the grounds and facts supporting the claim. CMAP will review the protest in a timely and impartial manner, led by the Procurement Officer or another neutral official. Final determinations will be issued in writing, with findings documented in the procurement file. This process complies with **FAR Part 33** and mirrors best practices under **30 ILCS 500/20-70**, balancing vendor rights with CMAP's need for timely and fair decision-making.

Article 10: Unsolicited Proposal Policy

CMAP may, at its discretion, consider unsolicited proposals that offer unique value to the region and align with CMAP's mission. These proposals must be independently developed, demonstrate originality, and may not conflict with active or planned procurements. In accordance with **FAR 15.6**, CMAP will assess whether the proposal warrants further consideration and whether a sole-source procurement or competitive solicitation is required. Any resulting contract must meet all federal, state, and internal procurement requirements, including documentation of cost reasonableness and approvals by the Executive Director and/or CMAP Board where applicable.

Article 11: Ethics and Conflicts of Interest

CMAP is committed to the highest standards of ethics in public procurement. Employees, contractors, and Board members are expected to always act with integrity and impartiality. CMAP's policy prohibits any employee or agent involved in the procurement process from participating in a transaction where a conflict of interest exists, as defined by **2 CFR 200.318(c)(1)**, **FAR Subpart 3.1**, and **30 ILCS 500/50-13**. All staff must disclose any actual or perceived conflict, and such conflicts must be mitigated or result in recusal from the procurement process. Additionally, CMAP prohibits gifts, gratuities, or favors from contractors and enforces post-employment restrictions consistent with state ethics laws. Such a conflict exists when any of the following has a financial or other interest in the firm selected for award:

- a. The employee, officer, agent, or Board member,
- b. Any member of his/her immediate family,
- c. His or her partner,
- d. An organization that employs, or is about to employ, any of the above.

Please refer to the CMAP ethics policy which can be found under section 1.7 of CMAP's [Personnel Policy Manual](#).

Article 12: FOIA

CMAP will respond to all FOIA requests in accordance with **2 CFR 200.338** and pursuant to the **Freedom of Information Act (5 U.S.C. 552)**.

Summary

This complete procurement framework is designed to uphold CMAP's fiduciary responsibilities, ensure equitable access to public contracts, and reinforce public trust. By combining federal and state compliance with practical procedures, CMAP enables its staff, partners, and vendors to operate efficiently and ethically in pursuit of shared regional goals.

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