

Policy

The Poverello Center, Inc. (TPC) is committed to ethical procurement practices and compliance with all applicable laws when selecting vendors, contractors, suppliers, and partners. As a nonprofit organization that may receive state or federal funding (including Ryan White HIV/AIDS Program grants), TPC prohibits engaging with any vendor, contractor, or entity (including affiliates) that is listed on the **Florida Convicted Vendor List** (maintained by the Florida Department of Management Services pursuant to §287.133, Florida Statutes) or federally debarred/suspended (via the System for Award Management - SAM.gov).

This policy ensures responsible stewardship of resources, protects against fraud or public entity crimes, and aligns with best practices for grant-funded organizations.

Procedure**Covered Individuals and Transactions**

This policy applies to all staff (full-time, part-time, contractors), volunteers with procurement duties, board members, and agents involved in vendor selection or contracting on behalf of TPC. It covers all purchases, contracts, subcontracts, or transactions exceeding the Category Two threshold under §287.017, Florida Statutes (currently \$35,000), as well as any funded by state or federal sources.

Prohibited Transactions

TPC shall not:

- Award contracts, purchase orders, or transact business with any person, entity, or affiliate placed on the Florida Convicted Vendor List (for 36 months from placement date).
- Engage with any entity debarred, suspended, or excluded under federal regulations (per 2 CFR Part 180 and 45 CFR Part 75 for HHS grants).
- Continue existing contracts if a vendor is subsequently placed on these lists (contracts may be terminated per terms).

Verification Process

- Prior to awarding any contract, purchase order, or significant transaction: – The responsible staff member (e.g., procurement designee or CEO) shall check the vendor against:
 - a. Florida Convicted Vendor List:
https://www.dms.myflorida.com/business_operations/state_purchasing/state_agency_resources/vendor_registration_and_vendor_lists/convicted_vendor_list
 - b. Federal Exclusions (SAM.gov): <https://sam.gov/content/exclusions> For ongoing contracts, annual checks are required.
- Vendors may be required to certify (via affidavit or contract clause) that they and their affiliates are not on these lists.

Reporting and Notification

- If a current vendor is found on a prohibited list, immediately notify the CEO and suspend further payments/transactions.
- Staff must report any known violations confidentially to the CEO. No retaliation against good-faith reporters.

Consequences

Violations of this policy may result in disciplinary action for involved staff/volunteers, up to termination. Contracts awarded in violation may be voided, and TPC may seek recovery of funds.

Training and Oversight

- Relevant staff receive annual training on this policy and verification procedures during onboarding and refreshers.
- The CEO or designee oversees compliance, maintains records of checks (e.g., screenshots or logs), and conducts periodic audits.

Shared Responsibility

Responsible vendor selection requires cooperation:

- Procurement staff verify lists before commitments.
- All covered individuals disclose known issues promptly.

Communication

- This policy is distributed upon onboarding, posted digitally, and reviewed annually.
- Integrated into procurement guidelines and volunteer handbook (if applicable).

Resources

- Florida DMS Convicted Vendor List (dms.myflorida.com).
- SAM.gov Exclusions Search (sam.gov).
- §287.133, Florida Statutes (Public Entity Crimes).
- 45 CFR Part 75 (Uniform Administrative Requirements for HHS Awards).

Approvals

Staff/Volunteer Signature:

Date:

Manager's Signature: Thomas Pietrogallo **Date:** 12.14.25 **CEO**

Signature: Thomas S. Pietrogallo, MSW, LCSW, MBA **Date:** 12/14/2025 **BOD Approved**

Date: 12/14/2025 **Date Established:** 12/14/2025