

PEEKSKILL HOUSING AUTHORITY PROCUREMENT POLICY

The Peekskill Housing Authorities Procurement Policy complies with HUD's Annual Contributions Contract (ACC), and the Federal procurement standards 2 CFR 200.317-200.327, HUD Handbook 7460.8, Rev. 2 of the "Procurement Handbook for Public Housing Agencies," and procurement thresholds for the NY State Public Housing Law Chapter 44-A, Article 8, PBG §151.1. The Authority is required to follow the most stringent of these requirements.

1.0 GENERAL PROVISIONS

1.1 PURPOSE

The purpose of this Procurement Policy is to provide a procurement system of quality and integrity; to assure that the Peekskill Housing Authority (Authority) procures supplies, service and constructs effectively, efficiently and at the most favorable prices; and to assure that the Authority's purchasing actions are in full compliance with applicable Federal and State regulation(s). Also incorporated into the Authority's Procurement Policy are **Section 3 - Notice PIH 2022-10 and Notice PIH 2022-38**, and to the extent possible and in the best interests of the Authority, **STAT. 1294 PUBLIC LAW 117-58, TITLE IX; Subtitle A - Build America, Buy America (BABA)**. BABA requires any "infrastructure project" funded by any "Federal Financial Assistance" (FFA) apply a domestic content procurement preference, meaning that all iron, steel, manufactured products, and construction materials used in the infrastructure project have been produced in the United States, unless the awarding agency has issued a waiver of this requirement. This is called the "Buy American Preference" (BAP). The resulting **Notice PIH 2009-31 (HA)** is referred to as PIH Implementation Guidance for the Buy American Requirement.

1.2 APPLICATION

This Procurement Policy applies to all contracts for the procurement of supplies, services, and construction entered in to by the Authority after the effective date of this Policy. It shall apply to every expenditure of Federal funds by the Authority for public purchasing, irrespective of the source of funds, including contracts that do not involve an obligation of funds (such as concession contracts).

Nothing in this Policy, however, shall prevent the Authority from complying with the terms and conditions of any grant, contract, gift or bequest that is otherwise consistent with NY and Federal law. The term "procurement," as used in this Policy includes both contracts and modifications (including change orders) for the acquisition of consulting services, construction activities, repositioning efforts, and includes the purchase, lease or rental of materials, supplies and equipment.

1.3 PUBLIC ACCESS TO PROCUREMENT INFORMATION

Procurement information shall be a matter of public record to the extent provided by NY State Public Housing Law Chapter 44-A, Article 8, PBG §151.1 and all materials shall be available to the public as required by law. Most procurement information that is not proprietary is a matter of public record and shall be available to the public to the extent provided in the New York State Freedom of Information Law.

1.4 EXECUTIVE DIRECTOR'S RESPONSIBILITIES

The Approving Official shall administer all procurement transactions. The Approving Official shall be the Executive Director or any other individual so designated by the Executive Director. Any delegations of contracting authority must be documented in writing. The Contracting Officer shall ensure that the following occur:

- i.** Procurement requirements shall be subject to a planning process to assure efficient and economical purchasing;
- ii.** Contracts and modifications shall be in writing and clearly specify the desired supplies, services, or construction; are supported by sufficient documentation regarding the history of the procurement, including as a minimum the method of procurement chosen, the selection of the contract type, the rationale for selecting or rejecting offers, and the basis for the contract price; and that contracts and modifications are awarded only by the Authority employees designated in writing as having such authority;
- iii.** For procurements other than micro and small purchases, public notice shall be given of each upcoming procurement, an adequate time period as provided for by law in preparation for and submission of bids or proposals, and notice of contract awards is made available to the public;
- iv.** Solicitation procedures are conducted in full compliance with current Federal regulation 2 CFR (200.317-.327), NY State Public Housing Law Chapter 44-A, Article 8, PBG §151.1 and local laws, whichever is more stringent;
- v.** An independent cost estimate (ICE) shall be prepared before solicitation and shall be appropriately safeguarded for each procurement above the micro-purchase threshold; a cost analysis shall be conducted with each responses received;
- vi.** Contract award is made to the responsive and responsible bidder offering the lowest price (for sealed bid contracts) or contract award is made to the offeror whose proposal offers the greatest value to the Authority, considering price, technical, and other factors as specified in the solicitation (for contracts awarded based on competitive proposals); unsuccessful firms are notified within ten days following contract award;
- vii.** Work is inspected before payment, and payment is made promptly for contract work performed and accepted; and
- viii.** The Authority shall comply with applicable HUD review requirements and includes all federal, state and/or local procedures required.

1.5 CONTRACTOR RESPONSIBILITY

Procurements shall be conducted with responsible contractors, i.e., those who have the technical and financial competence to perform the work described in the contract documents and who have a satisfactory record of integrity. The AUTHORITY shall review each proposed contractor's ability to perform the contract successfully, considering factors such as full compliance with applicable Federal standards: 1) **BABA and Notice PIH 2009-31 (HA)** "PIH Implementation Guidance for Buy American Requirements, 2) **HUD Section 3, implemented in Notice PIH 2022-10 & Notice PIH 2022-38**, requirements as stipulated for economic opportunities for Low and Very-Low Income Recipients **24 CFR Part 75 Subpart B** "Additional Provisions for Public Housing Financial Assistance" and; 3) Contractor's integrity (including a review of the List of Parties Excluded from Federal Procurement and Non-procurement Programs as published by the U.S. General Services Administration), and 4) compliance with public policy, record of past performance (including contacting previous clients of the contractor, such as other Housing Authorities), and 5) financial and technical resources. Contracts shall not be awarded by the Authority to debarred, suspended, or ineligible contractors.

1.6 QUALIFIED BIDDER'S LISTS

Interested businesses shall be given an opportunity to be included on a qualified bidder's lists. Any pre-qualified lists of persons, firms, or products, which are used in the procurement of supplies and services, shall be kept current and shall include enough qualified sources to ensure competition. Firms shall not be precluded from qualifying during the solicitation period. Solicitation mailing lists of potential contractors shall include, but not be limited to, such pre-qualified suppliers.

1.7 COMPETITIVE SPECIFICATIONS

The Authority shall seek full and open competition in all procurement transactions. All specifications shall be drafted so as to promote overall economy for the purpose intended and to encourage competition in satisfying the Authority's needs. Specifications shall be reviewed prior to solicitation to ensure that they are not unduly restrictive or represent unnecessary or duplicative items. Functional or performance specifications are preferred. Detailed product specifications shall be avoided whenever possible. Consideration shall be given to consolidating or breaking out procurements to obtain a more economical purchase. For equipment purchases, a lease versus purchase analysis should be performed to determine the most economical form of procurement.

1.8 LIMITATIONS ON COMPETITION

The following specification limitations shall be avoided: geographic restrictions not mandated or encouraged by applicable Federal law (except for architect-engineer contracts, which may include geographic location as a selection factor if adequate competition is available); unnecessary bonding or experience requirements; brand name specifications (unless a written determination is made that only the identified item will satisfy the

Authority's needs); and brand name or equal specifications (unless they list the minimum essential characteristics and standards to which the item must conform to satisfy its intended use). Nothing in this procurement policy shall preempt any State licensing laws. Specifications shall be scrutinized to ensure that organizational conflicts of interest do not occur (for example, having a consultant perform a study of the Authority's computer needs and then allowing that consultant to compete for the subsequent contract for the computers).

1.9 COOPERATIVE PURCHASING

The Authority may enter into State and local intergovernmental agreements to purchase or use common goods and services. The decision to use an intergovernmental agreement or conduct a direct procurement shall be based on economy and efficiency. If used, the intergovernmental agreement shall stipulate who is authorized to purchase on behalf of the participating parties and shall specify inspection, acceptance, termination, payment, and other relevant terms and conditions. The Authority shall use Federal or State excess and surplus property instead of purchasing new equipment and property whenever such use is feasible and reduces project costs; and to assure that Authority purchasing actions are in full compliance with applicable Federal standards, **Notice PIH 2009-31 (HA)**.

2.0 PROCUREMENT METHODS

2.1 Peekskill Housing Authority Purchasing Categories

Each local government must establish its own policies and procedures for procurement of goods and services not required by law. Procurement policies and procedures generally ensure that competition is sought in a reasonable and cost-effective manner for procurements below the bidding thresholds and for other contracts to be exempt from bidding.

2.2 New York State and Federal Monetary Thresholds

Monetary Thresholds – Generally, local governments and school districts are required to advertise for competitive bids when procurements exceed certain dollar thresholds. Purchase contracts involving expenditures in excess of \$25,000 for supplies and materials and \$50,000 for any other contract for public work are generally subject to competitive bidding. When using competitive bidding, contracts are awarded to the “lowest responsible bidder” after public advertisement for sealed bids. As further discussed below, local governments and school districts may elect to award “purchase contracts,” which exceed the monetary threshold, on the basis of “best value,” as an alternative to awarding contracts to the “lowest responsible bidder.”

There are several exceptions to the competitive bidding and competitive offering (“best value”) requirements, such as purchases made through the New York State Office of General Services, purchases made through certain county and federal contracts, purchases made through the use of certain contracts let by other states or political subdivisions, emergency purchases, professional services and purchases from a legitimate sole source. In addition, procurements of commodities and services may be required to be made from preferred sources. Exceptions and purchases from preferred sources are discussed later in this guide.

2.3 *Uniform Purchasing Guidelines*

- i. **General** - Contract requirements shall not be artificially divided so as to constitute a small purchase under this section (except as may be reasonably necessary to comply with Section 5.0 of this Policy).
- ii. **Petty Cash Purchases** - Purchases less than One Thousand Dollars (\$1,000.00) which can be satisfied by local sources may be processed through the use of a petty cash account. The Approving Official shall ensure that the account is established in an amount sufficient to cover small purchases made during a reasonable period (e.g., one month), security is maintained, and only authorized individuals have access to the account. The account shall be periodically reconciled and replenished by submission of a voucher to the Peekskill Housing Authority's Finance Director and periodically audited by the Finance Director or designee to validate proper use and to verify that the account total equals cash on hand plus the total of accumulated vouchers.
- iii. **Informal procurement methods** - When the value of the procurement for property or services under a federal award does not exceed the Simplified Acquisition Threshold (SAT), as defined in §200.1, or a lower threshold established by the Authority, formal procurement methods are not required. The Authority may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the Simple Acquisition Threshold (SAT) include:

(1) Micro-purchases; \$10k < small purchase / (SAT) < \$25K / \$50k

(i) General. Federal Micro-purchase threshold refers to the Federal Acquisition Regulation (FAR) and is \$10,000. NY State Public Housing Law Chapter 44-A, Article 8, PBG § 151.1 does not specify a Micro-Purchase threshold.

(a) \$10k is the established threshold for micro-purchases.

(ii) Distribution. The acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (See the definition of micro-purchase in § 200.1). To the maximum extent practicable, the Authority should distribute micro-purchases equitably among qualified suppliers.

(iii) Thresholds. The Authority is responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures. The micro-purchase threshold used by the Authority must be authorized or not prohibited under State, local, or tribal laws or regulations.

(iv) Awards. Micro-purchases may be awarded without soliciting competitive price or rate quotations if the Authority considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly. Purchase cards can be used for micro-purchases if procedures are documented.

(2) Small purchases; \$10k < small purchase / (SAT) < \$25K / \$50k

(i) **General.** The acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold.

(ii) **Distribution.** Small purchases in excess of \$10k but less than \$25,000 for supplies/materials and \$50,000 for all other contracts shall follow the small purchase procedures outlined in 2 CFR 200.317-200.327.

(a) Price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the Authority.

(b) Quotes may be obtained orally, by telephone, or in writing, as allowed by State or local laws.

(iii) **Thresholds.** The Authority is responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk and its documented procurement procedures which must not exceed the threshold established in the FAR*. When applicable, a lower simplified acquisition threshold used by the Authority must be authorized or not prohibited under State, local, or tribal laws or regulations.

(iv) **Award.** A contract shall be awarded to the offeror providing the lowest acceptable quote, unless justified in writing why the contract is not based on price and specify the other factors considered. If non-price factors are used, they shall be disclosed to all those solicited. The names, addresses, and/or telephone numbers of the offerors and persons contacted, and the date and amount of each quotation shall be recorded and maintained as a public record (unless otherwise provided in State or local law).

iv. Formal procurement methods - When the value of the procurement for property or services under a Federal financial assistance award exceeds the SAT, or a lower threshold established by the Authority, formal procurement methods are required. Formal procurement methods require the Authority to follow documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement can be used in accordance with § 200.319.

(1) Materials & Supplies; \$10k < small purchase / (SAT) < \$25K / \$50k

(2) All other Contracts; \$10k < small purchase / (SAT) < \$25K / \$50k

(i) **General** - The following formal methods of procurement are used for procurement of property or services above the simplified acquisition threshold or a value below the simplified acquisition threshold the Authority determines to be appropriate:

(1) **Sealed bids.** A procurement method in which bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bids method is the preferred method for procuring construction, if the conditions.

- (i) In order for sealed bidding to be feasible, the following conditions should be present:
- (A) A complete, adequate, and realistic specification or purchase description is available;
 - (B) Two or more responsible bidders are willing and able to compete effectively for the business; and
 - (C) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(ii) If sealed bids are used, the following requirements apply:

- (A) Bids must be solicited from an adequate number of qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
- (B) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
- (C) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
- (D) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of;
- (E) Any or all bids may be rejected if there is a sound documented reason.

As per NY State Public Housing Law Chapter 44-A, Article 8, PBG § 151.1, the threshold for contracts that involve the acquisition of supplies and materials, exceeding \$25k must be as follows:

– Require Sealed Bids > \$25k

Contracts for the purchase of materials or supplies in excess of twenty-five thousand dollars, *the period of advertisement shall be not less than ten days before the date set for the receipt of bids.*

As per NY State Public Housing Law Chapter 44-A, Article 8, PBG § 151.1, the threshold for contracts involving Architectural, Consulting, Construction, Demolition, Excavation, Alteration, Renovation that do not involve the acquisition of supplies and materials, exceeding \$50k must be as follows:

– Require Sealed Bids > \$50k

All contracts, except contracts for the purchase of materials or supplies, in excess of fifty thousand dollars shall be made on sealed bids, in compliance with a public notice *advertised at least once, not less than twenty days before the date set for the receipt of bids, in the official publication of the municipality, or if none exists, in a newspaper circulating in the municipality.*

***As per the HUD Handbook 7460.8, Rev. 2 of the "Procurement Handbook for Public Housing Agencies," the following clarification for solicitations shall apply:

Method of Solicitation. While any of the following methods can be employed, the Approving Official should choose the method, which, considering matters of economy, provides for full and open competition.

1. Advertising in newspapers or other print mediums of local or general circulations.
2. Advertising in various trade journals or publications.
3. **E-Procurement.** Authority's may conduct their public procurements through the internet using E-procurement systems. However, all E-procurements must otherwise be in compliance with HUD Handbook 7460.8, Rev. 2 of the "Procurement Handbook for Public Housing Agencies," Federal procurement standards of 2 CFR 200 and the procurement guidelines for the NY State Public Housing Law Chapter 44-A, Article 8, PBG § 151.1., and the Authority's own procurement policy. Steps must be taken to meet the requirements for full and open competition to avoid potential protests.

Time Period for Solicitation. The solicitation must be run for a period sufficient to achieve effective competition, which, in the case of paid advertisements, *should generally be run not less than once each week for two consecutive weeks.*

Mandatory Forms/Contract Provisions. The Authority must include with the solicitation/bid package the following mandatory forms, which contain all mandatory contract provisions.

1. Form HUD-5369-B, Instructions to Offerors – Non-Construction.
2. Form HUD-5369-C, Certifications and Representations of Offerors; Non-Construction Contract.
3. In addition, the Authority may want to include with the solicitation Form HUD-5370-C, General Conditions for Non-Construction Contracts.

Note: The forms listed above assume that competitive proposals are used for procuring non-construction services. Only under limited circumstances would construction services be procured by competitive proposals.

2.3 Uniform Bid / Proposal Review and Award Guidelines

- i. Solicitation and Receipt of Bids** - An invitation for bids shall be issued including specifications and all contractual terms and conditions applicable to the procurement, including a statement that award will be made to the lowest responsible and responsive bidder whose bid meets the requirements of the invitation for bids. The invitation for bids shall state the time and place for both the receipt of bids and the public bid opening. All bids received shall be time- stamped but not opened and shall be stored in a secure place until bid opening. A bidder may withdraw its bid at any time prior to bid opening.
- v. Bid Opening and Award** - Bids shall be opened publicly, an abstract of bids shall be recorded, and the bids shall be available for public inspection. If equal low bids are received from responsible bidders, award shall be made by drawing lots or similar random method,

unless otherwise provided in State or local law and stated in the invitation for bids. If only one responsive bid is received from a responsible bidder, award shall not be made unless a cost or price analysis verifies the reasonableness of the price.

v. Mistakes in Bids – In addition to this Policy, the following requirements apply:

1. Correction or withdrawal of inadvertently erroneous bids may be permitted, where appropriate, before bid opening by written or telegraphic notice received in the office designated in the invitation for bids prior to the time set for bid opening. After bid opening, corrections in bids shall be permitted only if the bidder can show by clear and convincing evidence that a mistake of a nonjudgmental character was made, the nature of the mistake, and the bid price actually intended. A low bidder alleging a nonjudgmental mistake may be permitted to withdraw its bid if the mistake is clearly evident on the face of the bid document, but the intended bid is unclear or the bidder submits convincing evidence that a mistake was made.
2. All decisions to allow correction or withdrawal of bid mistakes shall be supported by a written determination signed by the Contracting Officer. After bid opening, no changes in bid prices or other provisions of bids prejudicial to the interest of the Authority or fair competition shall be permitted.

vi. Bonds - In addition to this Policy, the following requirements apply:

- a. For construction contracts exceeding \$50,000, other than those specified in 3b and 3c below, contractors shall be required to submit the following, unless otherwise required by State or local laws or regulations:
 1. a bid guarantee from each bidder equivalent to 5% of the bid price; and
 2. a performance bond for 100% of the contract price; and
 3. a payment bond for 100% of the contract price.
- b. In the case of construction of conventional development projects funded pursuant to the U.S. Housing Act of 1937, the contractor shall be required to submit the following, unless otherwise required by State or local laws or regulations:
 1. A bid guarantee equivalent to 5% of the bid price; and
 2. One of the following:
 - c. Payment & Performance bond of 100% of contract price; or
 - d. 20% cash escrow; or
 - e. 25% irrevocable letter of credit.
- f. In the case of construction under the Comprehensive Grant Program or the Capital Fund Program funded pursuant to the U.S. Housing Act of 1937, for any contract over \$25,000, the contractor shall be required to submit the following, unless otherwise required by State or local laws or regulations:
 1. A bid guarantee equivalent to 5% of the bid price; and
 2. One of the following:
 - g. Payment & Performance bond of 100% of contract price; or
 - h. 20% cash escrow; or
 - i. 25% irrevocable letter of credit.

c. COMPETITIVE PROPOSALS

- ii. Conditions for Use** - Competitive proposals (including turnkey proposals for development) may be used if there is an adequate method of evaluating technical proposals and where the Authority determines that conditions are not appropriate for the use of sealed bids. An adequate number of qualified sources shall be solicited (normally, at least 3).
- iii. Solicitation** - The request for proposals (RFP) shall clearly identify the relative importance of price and other evaluation factors and sub factors, including the weight given to each technical factor and sub factor. A mechanism for fairly and thoroughly evaluating the technical and price proposals shall be established before the solicitation is issued. Proposals shall be handled so as to prevent disclosure of the number of offerors, identity of the offerors, and the contents of their proposals. The proposals shall be evaluated only on the criteria stated in the request for proposals.
- iv. Negotiations** - Unless there is no need for negotiations with any of the offerors, negotiations shall be conducted with offerors who submit proposals determined to have a reasonable chance of being selected for award, based on evaluation against the technical and price factors as specified in the RFP. Such offerors shall be accorded fair and equal treatment with respect to any opportunity for negotiation and revision of proposals. The purpose of negotiations shall be to seek clarification with regard to and advise offerors of the deficiencies in both the technical and price aspects of their proposals so as to assure full understanding of and conformance to the solicitation requirements. No offeror shall be provided information about any other offeror's proposal, and no offeror shall be assisted in bringing its proposal up to the level of any other proposal. Offerors shall not be directed to reduce their proposed prices to a specific amount in order to be considered for award. A common deadline shall be established for receipt of proposal revisions based on negotiations.
- v. Award** - After evaluation of proposal revisions, if any, the contract shall be awarded to the responsible firm whose qualifications, price and other factors considered are the most advantageous to the Authority.
- vi. Architect/Engineer Services** - Architect/engineer services in the excess of the small purchase limitation (or less if required by State or local law) may be obtained by either the competitive proposals method or qualifications-based selection procedures, unless State law mandates a specific method. Sealed bidding, however, shall not be used to obtain architect/engineer services. Under qualifications-based selection procedures, competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to the negotiation of fair and reasonable compensation. Price is not used as a selection factor under this method. Qualifications-based selection procedures shall not be used to purchase other types of services even though architect-engineer firms are potential sources.

d. NONCOMPETITIVE PROPOSALS

- vii. **Conditions for Use** - Procurements shall be conducted competitively to the maximum extent possible. Procurement by noncompetitive proposals may be used only when the award of a contract is not feasible using small purchase procedures, sealed bids, or competitive proposals, and one of the following applies:
1. The item is available only from a single source, based on a good faith review of available sources;
 2. An emergency exists that seriously threatens the public health, welfare, or safety; endangers property; or would otherwise cause serious injury to the Authority, as may arise by reason of a flood, earthquake, epidemic, riot, equipment failure, or similar event. In such cases, there must be an immediate and serious need for supplies, services, or construction such that the need cannot be met through any other procurement methods, and the emergency procurement shall be limited to those supplies, services, or construction necessary to meet the emergency;
 3. HUD authorizes the use of noncompetitive proposals; or
 4. After solicitation of a number of sources, competition is determined inadequate.
- viii. **Justification** - Each procurement based on noncompetitive proposals shall be supported by a written justification for using such procedures.
- ix. **Price Reasonableness** - The reasonableness of the price for all procurements based on noncompetitive proposals shall be determined by performing a cost analysis.

e. COST AND PRICE ANALYSIS

- x. **General** - Some form of cost or price analysis shall be performed for all procurement actions, including contract modifications, using the procedures described in HUD Handbook 7460.8, Rev. 2 of the "Procurement Handbook for Public Housing Agencies. The degree of analysis shall depend on the facts surrounding each procurement.
- xi. **Submission of Cost or Pricing Information** - If the procurement is based on noncompetitive proposals, or when only one offer is received, or for other procurements as deemed necessary by the Authority (e.g., when contracting for professional, consulting, or architect/engineer services) the offeror shall be submit:
- xii. **Cost Analysis** - Cost analysis shall be performed if an offeror/contractor is required to submit a cost breakdown as part of its proposal. When a cost breakdown is submitted a cost analysis shall be performed of the individual cost elements, the Authority shall have a right to audit the contractor's books and records pertinent to such costs, and profit shall be analyzed separately. Costs shall be allowable only to the extent that they are consistent with applicable Federal cost principles (for commercial firms, Subpart 31.2 of the Federal

Acquisition Regulation, 48 CFR Chapter 1). In establishing profit, the Authority shall consider factors such as the complexity and risk of the work involved, the contractor's investment and productivity, the amount of subcontracting, the quality of past performance, and industry profit rates in the area for similar work.

1. A cost breakdown showing projected costs and profit;
2. Commercial pricing and sales information, sufficient to enable the Authority to verify the reasonableness of the proposed price as a catalog or market price of a commercial product sold in substantial quantities to the general public; or
3. Documentation showing that the offered price is set by law or regulation.

xiii. **Price Analysis** - competitive procurements in which cost or pricing information is not required of contractors, the Authority shall perform a comparison of prices received in relation to the independent cost estimate, to ensure that the price being paid is reasonable.

f. CANCELLATION OF SOLICITATIONS

An invitation for bids, request for proposals, or other solicitation may be cancelled before offers are due if the Authority no longer requires the supplies, services or construction; the Authority can no longer reasonably expect to fund the procurement; proposed amendments to the solicitation would be of such magnitude that a new solicitation would be desirable; or similar reasons. The reasons for cancellation shall be documented in the procurement file and the reasons for cancellation and/or rejection shall be provided upon request to any offeror solicited.

3.0 CONTRACTS, CLAUSES, CONTRACT ADMINISTRATION

3.1 CONTRACT TYPES

Any type of contract which is appropriate to the procurement and which will promote the best interests of the Authority may be used, provided that the cost plus a percentage of cost and percentage of construction cost methods are prohibited. All procurements shall include the clauses and provisions necessary to define the rights and responsibilities of the parties. A cost reimbursement contract shall not be used unless it is likely to be less costly or it is impracticable to satisfy the Authority's needs otherwise; the proposed contractor's accounting system is adequate to allocate costs in accordance with applicable cost principles (for commercial firms, see HUD Handbook); the contractor is paid only allowable costs. A time and material contract may be used only if a written determination is made that no other contract type is suitable, and the contract includes a ceiling price that the contractor exceeds at its own risk.

3.2 OPTIONS

Options for additional quantities or performance periods may be included in contracts, provided that (i) the option is contained in the solicitation; (ii) the option is a unilateral right of the Authority; (iii) the contract states a limit on the additional quantities and the overall term of the contract; (iv) the options are evaluated as part of the initial competition; (v) the

contract states the period within which the options may be exercised; (vi) the options may be exercised only at the price specified in or reasonably determinable from the contract; and (vii) the options may be exercised only if determined to be more advantageous to the Authority than conducting a new procurement.

3.3 CONTRACT CLAUSES

In addition to containing a clause identifying the contract type, all contracts shall include any clauses required by Federal statutes, executive orders, and their implementing regulations, as provided in 2 CFR §200.320(c), Noncompetitive Procurement. There are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:

- (1) The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (see paragraph (a)(1) of this section);
- (2) The item is available only from a single source;
- (3) The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
- (4) The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the non-Federal entity; or
- (5) After solicitation of a number of sources, competition is determined inadequate.

3.4 CONTRACT ADMINISTRATION

A contract administration system designed to ensure that contractors perform in accordance with their contracts shall be maintained. The system shall include procedures for inspection of supplies, services, or construction, as well as monitoring contractor performance, status reporting on construction contracts, and similar matters.

4.0 APPEALS AND REMEDIES

4.1 GENERAL

It is the Authority's policy to resolve all contractual issues informally at the Authority level, without litigation. Disputes shall not be referred to HUD until all administrative remedies have been exhausted at the Authority level. When appropriate, the Authority may consider the use of informal discussions between the parties by individuals who did not participate substantially in the matter in dispute to help resolve the differences. HUD will only review protests in cases of violations of Federal law or regulations and failure of the Authority to review a complaint or protest.

4.2 BID PROTESTS

Any actual or prospective contractor may protest the solicitation or award of a contract for serious violations of the principles of this Policy. Any protest against a solicitation must be received before the due date for receipt of bids or proposals, and any protest against the award of a contract must be received within ten (10) calendar days after contract award, or the protest will not be considered. All bid protests shall be in writing and submitted to the Approving Official or designee, who shall issue a written decision on the matter. The Approving Official may, at his or her discretion, suspend the procurement pending resolution of the protest, if warranted by the facts presented.

4.3 CONTRACT CLAIMS

All claims by a contractor relating to performance of a contract shall be submitted in writing to the Approving Official, or designee, for a written decision. The contractor may request a conference on the claim. The Approving Official's decision shall inform the contractor of its appeal rights to the Executive Director.

5.0 SECTION 3 - ASSISTANCE TO SMALL AND OTHER BUSINESSES

5.1 APPLICABILITY

Section 3 final rule applies in whole, or in part, to Public and Indian Housing programs (PIH) including the Public Housing (PH) Operating and Capital Fund programs, Rental Assistance Demonstration (RAD), Choice Neighborhoods (CN), and mixed-finance developments under 24 CFR Section 905.604 (24 CFR Section 905.604 p. 359).

Section 3 requirements apply to properties that are recipients of Section 8 rental assistance if they are recipients of other Federal funding covered by the Section 3 statute, e.g., Community Development Block Grant (CDBG) funds and exceed the funding threshold set by HUD. Pre-development work conducted prior to a RAD conversion using pre-conversion public housing financial assistance is subject to Section 3 requirements. The final rule on Section 3 regulations, at 24 CFR Part 75 (the new rule), was published on September 29, 2020, and became effective as of November 30, 2020. The new rule updated HUD's Section 3 regulations by reducing regulatory burden and by incentivizing employers to retain and invest in low- and very low-income workers. The new rule streamlined reporting requirements and provide program-specific oversight simplifying the administrative burden.

- ❖ Aligning with standard business practice of reporting labor hours (instead of total number of new hires under the previous rule) to promote sustained employment and career development for low- and very low-income workers;
- ❖ **Establishing a \$200,000 threshold for Section 3** rehabilitation, construction and other public construction projects funded with housing and community development financial assistance, and establishing a \$100,000 threshold where the assistance is from HUD's Lead Hazard Control and Healthy Homes programs (LHCHH), as authorized by Sections 501 or 502 of the Housing and Urban Development Act of 1970, the Lead-Based Paint Poisoning Prevention Act³, and the Residential Lead-Based Paint Hazard Reduction Act of 1992;

- ❖ Identifying “Targeted Section 3 Workers” as described in the key terms of this notice, which also includes information on benchmarking and prioritization in Section VI (Reporting).
- ❖ Allowing small AUTHORITYs the option of qualitatively reporting and measuring Section 3 efforts toward benchmarks; and
- ❖ Integrating Section 3 into HUD’s ongoing program enforcement by adding compliance and oversight to regular program oversight activities.

HUD also published a companion Benchmark Notice, 85 FR 60907, titled “Section 3 Benchmarks for Creating Economic Opportunities for Low- and Very Low-Income Persons and Eligible Businesses.” The Benchmark Notice establishes the current numeric goals for compliance with Section 3 requirements. HUD may adjust funding thresholds or establish new benchmarks (either a single nationwide benchmark or multiple benchmarks based on geography, type of assistance, or other variables) periodically as new information becomes available pursuant to the regulation at 24 CFR section 75.23(b)(1)(2) (24 CFR Sections 75.23(b)(1) and (b)(2) p. 61565).

HUD must publish all updates in the Federal Register and all updates are subject to public comment. The Section 3 final rule also applies to other HUD-funded projects receiving **more than \$200,000** in housing and community development financial assistance, including but not limited to CDBG, Housing Opportunities for Persons with AIDS (HOPWA), HOME Investment Partnerships (HOME), Housing Trust Fund (HTF), Section 202 Direct Loans for the Elderly, and Section 811 Supportive Housing for Persons with Disabilities.

REQUIRED EFFORTS

Section 3 of the Housing and Urban Development Act of 1968, as amended by the Housing and Community Development Act of 1992 (the Act), requires AUTHORITYs, and their contractors and subcontractors, make their best efforts, consistent with existing Federal, State, and local laws and regulations, to give to low- and very low-income persons training, employment, and economic opportunities generated by development assistance provided pursuant to section 1437c of Title 42, Operating Fund and Capital Fund assistance provided pursuant to section 1437g of Title 42.

HUD must implement and enforce Section 3 in accordance with the Act and consistent with Presidential Executive Orders 11625, 12138, 12432, and Section 3 of the HUD Act of 1968, 24 CFR Part 75, Notice PIH 2022-10 and Notice PIH 2022-38; the AUTHORITY shall make efforts to ensure that small and minority-owned businesses, women's business enterprises, and individuals or firms located in or owned in substantial part by persons residing in the area of an Authority development are used when possible. Such efforts shall include, but shall not be limited to the following:

- A. Including such firms, when qualified, on solicitation mailing lists;
- B. Encouraging their participation through direct solicitation of bids or proposals whenever they are potential sources;
- C. Establishing delivery schedules, where the requirement permits, which encourage participation by such firms;
- D. Using the services and assistance of the Small Business Administration and the Minority Business Development Agency of the Department of Commerce;
- E. **Including in contracts a clause** requiring contractors, to the greatest extent feasible, to provide opportunities for training and employment for lower income residents of the

development area and to award subcontracts for work in connection with the project to business concerns which are located in, or owned in substantial part by persons residing in the area of the development, as described in 24 CFR 135; and

- F. Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed in A through E above.

If a recipient complies with the regulatory priorities regarding effort and meets the established outcome benchmarks, HUD will presume the recipient is following Section 3 requirements, absent evidence to the contrary.

Table 1 Applicability of Section 3 to HUD-PIH Programs

Applicable	Not Applicable
<ul style="list-style-type: none"> • Public Housing Capital Funds • Public Housing Operating Funds • Choice Neighborhoods • Public Housing Mixed-Finance Development • Rental Assistance Demonstration (RAD) <ul style="list-style-type: none"> – <i>Construction and Rehabilitation</i> <ul style="list-style-type: none"> ○ Predevelopment Costs for RAD pre-conversion work using covered PH funds ○ RAD Post-Conversion contractually obligated activities • Section 8 assisted properties or projects that also receive more than \$200,000 of other Section 3 covered funding, e.g., CDBG, HOME. 	<ul style="list-style-type: none"> • Section 8 Housing Choice Vouchers (HCV) • Section 8 Monthly Rental Assistance Payments including those under PBV and PBRA Contracts • RAD– <i>Section 8 Rental Assistance ONLY</i> • Material Supplies Contracts • Indian and Tribal Preferences

5.0 DEFINITIONS

- A small business is defined as a business that is independently owned, not dominant in its field of operation, and not an affiliate or subsidiary of a business dominant in its field of operation. The size standards in 13 CFR 121 shall be used, unless the Authority determines that their use is inappropriate.
- A minority-owned business is defined as a business which is at least 51% owned by one or more minority group members; or, in the case of a publicly-owned business, one in which at least 51% of its voting stock is owned by one or more minority group members, and whose management and daily business operations are controlled by one or more such individuals. Minority group members include, but are not limited to, Black Americans, Hispanic Americans, Native Americans, Asian Pacific Americans and Asian Indian Americans, and Hasidic Jewish Americans.

- A women's business enterprise is defined as a business that is at least 51% owned by a woman or women who are U.S. citizens and who also control or operate the business.
- A business concern located in the area of the development is defined as an individual or firm located within the relevant Section 3 covered development area, as determined pursuant to 24 CFR 135.15, 24 CFR Part 75, Notice PIH 2022-10 and Notice PIH 2022-38, and be listed on HUD's registry of eligible business concerns and meeting the definition of small business above. A business concern owned in substantial part by persons residing in the area of the development is defined as a business concern which is 51% or more owned by persons residing within the Section 3 covered project, owned by persons considered by the U.S. Small Business Administration to be socially or economically disadvantaged, listed on HUD's registry of eligible business concerns, and meeting the definition of small business above.

5.1 KEY TERMS

- Labor hours are paid hours worked by persons on a Section 3 project or by persons employed with funds that include public housing financial assistance.
- Low-income person is a person with an income that meets the definition for low-income as defined in Section 3(b)(2) of the 1937 Act, typically established as 80 percent of the area median individual income and conforming to HUD Income limits.
- Professional services are non-construction services that require an advanced degree or professional licensing, including, but not limited to, contracts for legal services, financial consulting, accounting services, environmental assessment, architectural services, and civil engineering services.
- Public housing financial assistance funds include development assistance pursuant to Section 5 of the 1937 Act, Operating Funds, Capital Funds, public housing grant funds such as Resident Opportunities and Self-Sufficiency (ROSS) or Jobs Plus programs and the full extent of mixed-finance development as described in 24 CFR 905.604.
- Section 3 refers to Section 3 of the Housing and Urban Development Act of 1968, as amended (12 U.S.C. 1701u).
- Section 3 business concern is a business that meets at least one of the following criteria, documented within the last six-month period:
 - It is at least 51 percent owned and controlled by low- or very low-income persons;
 - Over 75 percent of the labor hours performed for the business over the prior three-month period is performed by Section 3 workers; or
 - It is a business at least 51 percent owned and controlled by current public housing residents or residents who currently reside in housing assisted by Section 8.

SECTION 3 RECIPIENT RESPONSIBILITIES

- Recipients are required to ensure their own compliance and the compliance of their contractors/subcontractors with the Section 3 regulations, as outlined at 24 CFR part 75.
- These responsibilities include but are not limited to the following:
- Designing and implementing procedures to comply with the requirements of Section 3: Recipient agencies must take an active role in ensuring Section 3 compliance and maintain records verifying that compliance.
- The recipient agency must act as a facilitator, connecting Section 3 workers to training and employment opportunities.
- The recipient agency must also work to link developers and contractors with capable Section 3 business concerns.
- The recipient agency is responsible for ensuring that contractors and subcontractors are aware of, and in compliance with, Section 3 requirements.
- Recipient agencies shall ensure compliance with Section 3 by assessing the hiring and subcontracting needs of contractors; regularly monitoring contractor compliance; assisting and actively cooperating with the Secretary of HUD in obtaining the compliance of contractors; penalizing non-compliance; providing incentives for good performance; and refraining from entering into contracts with any contractor that previously failed to comply with the requirements of Section 3.
- Recipient agencies must document all actions taken to comply with the requirements of Section 3 and document these activities.

Section 3 projects are housing rehabilitation and construction, and other public construction projects assisted under HUD programs that provide housing and community development financial assistance, (e.g., CDBG and HOME) when the total amount of assistance to the project exceeds a threshold of \$200,000. The threshold is \$100,000 where the assistance is from HUD's Lead Hazard Control and Healthy Homes programs (LHCHH), as authorized by Sections 501 or 502 of the Housing and Urban Development Act of 1970¹², the Lead-Based Paint Poisoning Prevention Act¹³, and the Residential Lead-Based Paint Hazard Reduction Act of 1992¹⁴. The project is the site or sites together with any building(s) and improvements located on the site(s) that are under common ownership, management, and financing.

Section 3 worker is any worker, for both public housing financial assistance and housing and community development assistance,¹⁵ who currently fits, or when hired within the past five years fit, at least one of the following categories, as documented:

- The worker's income for the previous or annualized calendar year is below the income limit established by HUD.
- The worker is employed by a Section 3 business concern.
- The worker is a YouthBuild participant.

Targeted Section 3 worker is, in the context of public housing financial assistance means a Section 3 worker who is:

- A worker employed by a Section 3 business concern; or
- A worker who currently fits, or when hired fit, at least one of the following categories, as documented within the past five years¹⁶:

- A resident of public housing or Section 8-assisted housing.
- A resident of other projects managed by the AUTHORITY that is providing the assistance; or
- A YouthBuild participant.

An employer may choose whether the worker is defined as a Section 3 worker for a five-year period at the time of the worker’s hire, or when the worker is first certified as meeting the Section 3 worker definition.

For reference (and by contrast), a Targeted Section 3 worker in the context of housing and community development financial assistance programs is a Section 3 worker who is:

- ❖ A worker who is employed by a Section 3 business concern; or
- ❖ A worker who currently fits or (when hired fit) at least one of the following categories, as documented within the past five years:
 - ❖ Living within the service area or the neighborhood of the project, as defined in
 - ❖ As defined in 24 CFR section 75.5; or
 - ❖ A YouthBuild participant.

Very low-income person is a person with an income that meets the definition for very low-income as defined in Section 3(b)(2) of the 1937 Act, as established at HUD Income limits.

Please refer to www.huduser.org/portal/datasets/il.html for current, local Income Limit information.

- Select current year.
- Select “Access Individual Income Limit area”
- Select “click here for FY xxxx IL Documentation” (where xxxx is the current fiscal year)
- Select State & County

6.0 REPORTING

Section 3 Reporting Platform (S3R) is a successor system to the Section 3 Performance Evaluation and Registration System, or SPEARS formerly used for Section 3 compliance reporting by PHAs. PHAs and other recipients of public housing financial assistance subject to Section 3 requirement will be required to submit compliance reports via S3R when it becomes available for use.

Under the new rule, funding recipients will track total labor hours worked for all workers and for Section 3 Workers and Targeted Section 3 Workers for the applicable fiscal year. Under the previous rule (24 CFR Part 135), HUD required PHAs to track new Section 3 hires. Tracking new hires is no longer required. This change enables recipients to measure total actual employment and the proportion of the total employment performed by low- and very low-income workers. Per PIH Notice 2022-10, Section 3 Performance Evaluation and Registration System (SPEARS) is no longer used for Section 3 compliance reporting. Instead, PHAs will report in a successor system that is still in development and will not be available for PHAs in accordance with the reporting dates published in Section VI of PIH 2022-10. Therefore, PHAs are not required to report on Section 3 labor hours or other Section 3 compliance efforts to HUD until further notice. HUD will provide further notification when and through what means reporting will be required with appropriate lead time to allow for reporting processes to be adjusted if necessary.

Labor Hour Reporting

AUTHORITYs report annually:

- The total number of labor hours worked;
- The total number of labor hours worked by Section 3 workers; and
- The total number of labor hours worked by Targeted Section 3 workers.

Labor hours for Section 3 workers and Targeted Section 3 workers may be counted for five years from when their Section 3 status is established by the employer, given that employment is maintained with the same employer.

1. **Section 3 Workers including AUTHORITY Staff.** Section 3 or Targeted Section 3 workers may be employed by a contractor or subcontractor to work on AUTHORITY projects funded by public housing financial assistance or Section 3 projects funded by housing and community development financial assistance. In addition, AUTHORITY employees who meet the definition for Section 3 or Targeted Section 3 workers at the time they are hired or certified as Section 3 or Targeted Section 3 eligible workers will also count toward the Section 3 or Targeted Section 3 worker labor hours. The certification date must be on or after the effective date of the new rule, November 30, 2020.

2. **Duration for Counting Labor Hours.** The Section 3 and Targeted Section 3 worker labor hours may be counted by the AUTHORITY for up to five-years from the certification or hire date. An employer may choose whether the workers are defined as Section 3 workers for a five-year period at the time of the workers' hire, or when the workers are first certified as meeting the Section 3 worker definition.

Labor hours must be counted as follows depending on the funding source:

- The labor performed on a Section 3 project for housing and community development financial assistance, or
- For all labor hours performed within the fiscal year for public housing financial assistance.

3. **Qualification of Section 3 Workers.** Section 3 worker takes place at either the date of the Section 3 covered activity or the date of initial hire by the employer, if hired within the past five years. Labor hours of an employee who is low- or very low-income at hire will continue to count for five years even if that person moves into a new, more advanced position with the same employer. HUD anticipates that employees with five years of experience with that same employer would be advancing in the business and would eventually need to be replaced by a new, presumably low- or very low-income entry-level employee.

Section 3 worker for both public housing financial assistance, housing & community development assistance means any worker who currently fits or when hired within the past five years fit at least one of the following categories, as documented:

- The worker's income for the previous or annualized calendar year is below the income limit established by HUD.

- The worker is employed by a Section 3 business concern.
- The worker is a YouthBuild participant.

4. **Professional Services.** Labor hours for Section 3 and Targeted Section 3 workers may include hours from professional services that require specialized and advanced degrees and licensing, i.e., architects and engineers. However, pursuant to 24 CFR 75.15(a)(4), it is not required for AUTHORITYs to include the labor hours worked for professional services jobs in the total labor hours worked on the project. Other professional service categories may include, but are not limited to, financial managers, accountants, and auditors. Professional service firms may employ Section3 qualified workers.

5. **Good Faith Assessment of Labor Hours.** The rule at 24 CFR section 75.15(a)(5) permits a temporary exception for contractors and sub-contractors that have not been subject to reporting for labor hours and are not currently operationally set-up for this tracking to submit good faith assessment of the labor hours for full-time and part-time Section 3 workers based on time and attendance records.

7.0 ETHICS IN PUBLIC CONTRACTING

The Authority shall adhere to the following code of conduct and shall establish a system of sanctions for violations consistent with applicable State or local law.

7.1 CONFLICT OF INTEREST

No employee, officer or agent of this Authority shall participate directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. Such conflict would arise when a financial or other interest in a firm selected for award is held by:

- 7.1.1 An employee, officer or agent involved in making the award;
- 7.1.2 His/her relative (including father, mother, son, daughter, brother, sister, uncle, aunt, first cousin, nephew, niece, husband, wife, father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, stepfather, stepmother, stepson, stepdaughter, stepbrother, stepsister, half-brother, or half-sister);
- 7.1.3 His/her partner; or,
- 7.1.4 An organization which employs, is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.

7.2 GRATUITIES, KICKBACKS, AND USE OF CONFIDENTIAL INFORMATION

Authority officers, employees or agents shall not solicit or accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to subcontracts and shall not knowingly use confidential information for actual or anticipated personal gain.

7.3 PROHIBITION AGAINST CONTINGENT FEES

Contractors shall not retain a person to solicit or secure an Authority contract for a commission, percentage, brokerage, or contingent fee, except for bona fide employees or bona fide established commercial selling agencies.

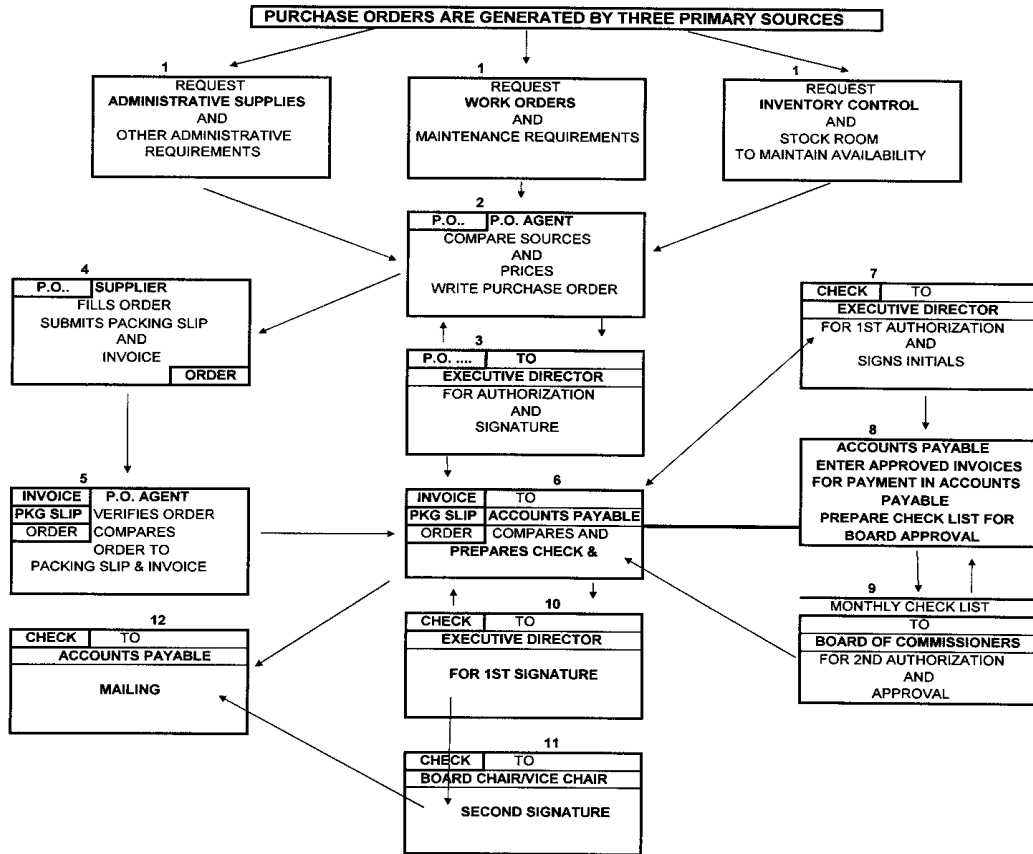
AUTHORITY
PROCEDURE FOR PROCESSING PURCHASE ORDERS, ACCOUNTS PAYABLE,
AND AUTHORIZATION FOR PAYMENT

The primary purpose of this procedure for processing purchase orders and authorizing payment is to assure that the Board of Commissioners authorizes all Authority expenditures and that all Authority purchases are authorized by the Executive Director. This procedure supports Section 2.1 SMALL PURCHASE PROCEDURES of HUD Handbook 7460.8, Rev. 2, Federal procurement standards of 2 CFR 200 and the procurement guidelines for the NY State Public Housing Law Chapter 44-A, Article 8, PBG § 151.1.

It contains provisions for the Executive Director to supervise small purchases by requiring the Executive Director to authorize and sign all purchase orders before they are sent to the supplier for processing; and to authorize accounts payable and all checks for payment before they are presented to the Board of Commissioners for final approval before payment. The increments of the procedure are as follows:

1. Request for purchases stem from three primary sources: a) Work Orders and maintenance requirements, b) The need to replenish stock room items (common supply and replacement items), and c) Request for administrative supplies and equipment;
2. The purchasing agent, after comparing sources of supply and prices, prepares the purchase order request for the Executive Director's authorization;
3. The Executive Director discusses the need, the source of supply, and the price before authorizing the purchase;
4. Supplier fills order and delivers items with invoices;
5. The purchasing agent verifies order, compares to invoice and submits invoices to accounts payable;
6. Accounts payable prepares checks for Executive Director's authorization;
7. Executive Director signs and/or initials checks;
8. Accounts payable enters approved invoices for payment in the accounts payable account, and prepares check list for Board approval;
9. 10, and 11 The Executive Director, Chairman, Vice Chairperson or any other authorized bank signer signs the checks; accounts payable mails the checks.

PEEKSKILL HOUSING AUTHORITY PURCHASE ORDER AND ACCOUNTS PAYABLE FLOW CHART



NOTE: NOT ALL BILLS ARE PRESENTED TO THE BOARD FOR APPROVAL. BILLS PAID SUBSEQUENT TO THE LAST BOARD MEETING BUT NOT ON THE BILL LIST I.E. EMPLOYEE BENEFIT PAYMENTS: HEALTH/DENTAL, UTILITIES, AND SMALL EXPENDITURES; ARE PRESENTED TO THE BOARD ON "BILLS PAID SUBSEQUENT TO LAST BOARD MEETING BUT NOT ON BILL LIST". THIS DISCLOSURE PROVIDES ALL BOARD MEMBERS WITH THE OPPORTUNITY TO SEE AND QUESTION ALL PHA CASH DISBURSEMENTS.

Self-Certification

The Authority self-certifies that this Procurement Policy, and the Authority's procurement system, complies with all applicable Federal regulations and as such, the Authority is exempt from prior HUD review and approval of individual procurement actions.

Adopted 04/13/2024
Amended 03/11/2024