



Jim Haining <jhaining@gmail.com>

REMINDER: Deadline for a new Procurement Policy

HAPA <mgifford@procurementassistance.org>
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To: jhaining@gmail.com

Tue, Nov 10, 2015 at 11:18 AM



Housing Agency Procurement Assistance

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Dear Procurement Professionals,

The purpose of this correspondence is to remind housing agencies that each Agency has a deadline of December 31, 2015 to have your Agency Procurement Policy revised to take into consideration the HUD-mandated transition from 24 CFR 85.36 to 2 CFR 200.317 through 200.326.

I have issued several Notices nationwide during the past year pertaining to this issue. For your convenience, those Notices are listed within the "Notices Issued" link within the menu at the top of the home page of my website, procurementassistance.org (the "Notices Issued" area is not password protected). To help you locate those Notices within the link, the dates of those Notices are:

June 17, 2015;
March 5, 2015;
February 24, 2015; and
December 19, 2014.

The June 17 Notice includes a sample procurement policy for your use. I strongly encourage your Agency to utilize this draft Policy (and NOT your current Policy) as I have substantially drafted it from the HUD-recommend Policy format located within Appendix No. 1 of HUD Procurement Handbook 7460.8 REV 2. To utilize this Policy draft, I also encourage you to review and implement the recommendations that I have included within the first attached document of the June 17 Notice.

Once your Policy has been approved by your Board of Commissioners, I also recommend that you send your revised Policy to your HUD Field Office to inform them that you have completed this requirement. It is my recommendation that you not burden HUD with a request to respond with approval of your new Policy (such approval is not typically required)--I am confident that HUD will advise you if they have any problems with your revision.

I, of course, do not represent or speak for HUD (I am an independent consultant serving housing agencies), but it is my opinion that, whereas HUD has mandated this transition from the aforementioned 24 CFR to 2 CFR, and, therefore, the ensuing revision of your Procurement Policy, each to be completed by the end of the end of the year (December 31, 2015), then it stands to reason that your failure to complete this Policy revision may make your Agency more susceptible to a procurement audit (hey, if HUD tells you to have something completed by a deadline and you chose to ignore that directive, what would you expect?).

Please do not hesitate to contact me if you have any questions or concerns as to anything that I have written herein or within any of the aforementioned Notices. Also, if you have not done so previously,

please feel free to click on the "Registration" link on the lower left side of my web site to gain access to my documents (there is not a charge to do so at any time).

As always, I wish you the best with your procurement and contracting activities and stand ready to assist if you need any assistance.

Regards,

Michael S. Gifford, C.P.M., CPSD

Housing Agency Procurement Assistance

I have a consulting practice providing procurement- and contracts-related mentoring, training, and technical assistance to housing agencies. I help housing agencies conduct procurement and contracts in a HUD-compliant and "best practice" manner. [Click here](#) to see my full resume. Please do not hesitate to contact me if you have any questions or concerns pertaining to procurement and contracts (initial answering of questions is "no charge"). As I am either on-the-road or on the phone a lot, an initial contact by e-mail is best; please be sure to include your return telephone number (office/cellular) so that I can call you back.

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