



Jim Haining <jhaining@gmail.com>

FORWARDING OF NOTICE: HUD Grants Management, and Oversight Requesting Code of Conduct

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

Thu, Feb 16, 2017 at 7:13 PM



Housing Agency Procurement Assistance

Housing Agency Procurement Assistance

Procurement Professionals,

I am grateful to Linda Bryant of the Texas Housing Association for sending me the following information. When I receive this kind of information, I will typically forward (share?) it nationwide so that we can all benefit. It is my understanding that this information was previously received from HUD by a housing agency in Texas. Please feel free to forward to me any similar notices that you receive that you feel that your peers would benefit from receiving.

It is my opinion that, if you have already converted your procurement policy to the new 2 CFR 200 as required by HUD, you do not need to add this specific language to your policy because it is already included by reference when you referenced within your revised policy the new applicable 2 CFR 200.317 through 200.326. NOTE: For more information as to the aforementioned "conversion of your procurement policy", please see my original Notice as to this issue that I issued several years ago. You can locate this Notice (and the attached forms) as follows:

- (1) Go to my website, procurementassistance.org.
- (2) Click on the "Notices Issued" link. (NOTE: this link is NOT password protected.)
- (3) Scroll down to the Notice issued on June 17, 2015.

I hope that this helps.

BEGIN CORRESPONDENCE RECEIVED FROM HUD

New language in **The Uniform Administrative Requirements for Cost Principles and Audit Requirements for Federal Awards (2CFR200)** requires grantees to:

1. Notify HUD of potential conflicts of interest, and
2. Maintain written standards of conduct covering conflicts of interest for employees and parent, affiliate and subsidiary organizations.

To ensure each organization sufficiently addresses conflict of interest (**2 CFR 200.318**), HUD reviews each Code of Conduct and maintains a list of organizations with compliant Codes of Conduct.

The Grants Management and Oversight Division (GMO) supports offices throughout the grants management lifecycle. GMO has established a Code of Conduct e-library so organizations need not submit Codes of Conduct with every application.

Organizations that previously submitted paper versions must submit an electronic copy by February 17, 2017 (for tracking purposes, please submit in response to this message).

When submitting the Code of Conduct, please confirm the accuracy of the information in this email notification:

1. DUNS number;
2. Organization name;
3. Mailing address;
4. Name, title, phone number and email address of person with executive authority.

Thank you for your prompt attention to this request. Please email Codes of Conduct and all questions to AskGMO@hud.gov.

PLEASE ADVISE IF YOU ARE NO LONGER A HUD GRANTEE SO THAT YOUR ORGANIZATIONS NAME CAN BE REMOVED FROM OUR DATABASE.

For more information as to the foregoing, please go to:
https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/grants/conduct

END OF CORRESPONDENCE RECEIVED FROM HUD

If you have any questions pertaining to this specific issue, it is best that you contact HUD directly (though I will respond to any thoughts or questions pertaining to my recommendations stated above).

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.

This email was sent to jhaining@gmail.com by HAPA
of Housing Agency Procurement Assistance
2308 Flower Spring St
Las Vegas, NV 89134

procurementassistance.org | [Unsubscribe from Email Notifications](#) | [Privacy Policy](#)