

State of Georgia  
**HOME-ARP**  
**Procurement Training**

Department of Community Affairs  
Housing Finance & Development Division  
Office of Community Housing Development



# Agenda

## Presentation:

- Review of 2 CFR §200.317-326  
(Procurement Standards)

## Q&A

**This is for training purposes. Always refer to 2 CFR 200 and additional federal official guidance.**

**If you or someone you know is homeless or at risk for homelessness:**

Homeless Resources:

<https://www.dca.ga.gov/safe-affordable-housing/homeless-special-needs-housing>

Rental Assistance:

<https://georgiarentalassistance.ga.gov/>

Department of Community Affairs  
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# Where is the procurement guidance located?

Multifamily Housing Program (MFHP) Financial Management Toolkit

<https://files.hudexchange.info/resources/documents/Multifamily-Housing-Program-Financial-Management-Toolkit.pdf>



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## 2 CFR 200 Exceptions

The requirements of [2 CFR part 200](#), as amended, apply to PJs, State recipients, and sub-recipients receiving HOME-ARP funds, except for the following provisions:

[2 CFR 200.306](#) Cost sharing or matching.

[2 CFR 200.307](#) Program income.

[2 CFR 200.308](#) Revision of budget and program plans.

[2 CFR 200.311](#) Real property.

\_\_\_\_\_ (except as provided in [24 CFR 92.257](#))

[2 CFR 200.312](#) Federally-owned and exempt property.

[2 CFR 200.329](#) Monitoring and reporting program performance.

[2 CFR 200.333](#) Fixed amount subawards.

[2 CFR 200.334](#) Retention requirements for records.



## 2 CFR 200 Requirements

### Where Can the Uniform Standards for Procurement for All HUD Awardees Be Found?

#### **2 CFR §200.317-326 (Procurement Standards):**

- 200.317: Procurement by States
- 200.318: General procurement standards
- 200.319: Competition
- 200.320: Methods of procurement to be followed
- 200.321: Contracting with small and minority business, women's business enterprises, and labor surplus area firms
- 200.322: Procurement of recovered materials
- 200.323: Contract cost and price
- 200.324: Federal awarding agency or pass through entity review
- 200 325: Bonding requirements
- 200.326: Contract provisions



## 2 CFR 200 Requirements

### 6c. General Procurement Standards (200.318)

#### What Are the Key Expectations for All Procurement Processes?

The general procurement standards articulated in section 200.318 include the following key expectations:

- Full and open competition is mandatory
- The purchaser must have **conflict of interest and procurement policies** in place
- Must avoid purchase of unnecessary or duplicative items
- Must award contracts only to responsible contractors
- Contractors that develop draft specifications, requirements, statements of work and invitations for bids or proposals must be excluded from bidding
- Must maintain proper documentation and records regarding procurements
- Emphasis added regarding the use of Inter-local cooperative agreements for the procurement of common shared goods and services
- Further defines time and material contracts



## 2 CFR 200 Requirements

### 6d. Categories of Procurement (200.320)

#### How Are Procurement Categories Differentiated?

Procurement requirements now fall essentially into two categories: 'small purchases' and 'substantial goods, services and property.' However, They each break down into subsets. Let's look at the big three:



# Micro Purchases

## 6d. Categories of Procurement (200.320)

Threshold: \$10,000

Pre-Solicitation Requirements:

- A scope of service, materials, labor, etc.

Solicitation Requirements:

- Quotes, Bids or Proposals

Evaluation Requirements:

- Price evaluation





# Small Purchases

## 6d. Categories of Procurement (200.320)

Threshold: \$10,000 to \$250,000

Pre-Solicitation Requirements:

- A scope of service, materials, labor, etc.
- Independent Cost Estimate

Solicitation Requirements:

- Sources (mailing lists, advertisements, etc.)
- Solicitation Notice and Amendments
- Record of Bids/RFPs Requested
  - (\$10K-\$25K can be verbal. Over \$25K to \$250K must be written)
- Quotes, Bids or Proposals



# Small Purchases (Continued)

## 6d. Categories of Procurement (200.320)

Threshold: \$10,000 to \$250,000

Evaluation Requirements:

- Technical Evaluation
- Price evaluation
- Evaluation Report
- Pre-award Survey and Responsibility Determinations

Award Requirements:

- Contract and Award Documents
- Notification to Unsuccessful Bidders
- Appeals (all correspondence)



# Small Purchases (Continued)

## 6d. Categories of Procurement (200.320)

Threshold: \$10,000 to \$250,000

### Post Award and Contract Administration

- Contract Modifications and Supporting Documentation
- Receiving Reports
- General Contract Correspondence
- Payment Record/Documentation
- Inspections and Field Reports
- Completion Certificate



# Sealed Bids

## 6d. Categories of Procurement (200.320)

Threshold: Greater than \$250,000

For amounts greater than \$250,000, only the most familiar entities should proceed without a project manager. For most entities, Small Purchasing thresholds will be used to procure a project manager who is very familiar with 2 CFR 200. Then the project manager will manage compliance from that point.

*Due to the complexity of the Sealed Bid Process, this presentation will not include training on sealed bids.*



# Example Procurement Checklist

## PROCUREMENT FILE CHECKLIST

Check the box for the procurement used:	<input type="checkbox"/>	X	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Item: PO:	Micro Purchase (Less than \$10K)	Small Purchase (\$10K to \$250K)	Sealed Bid (> \$250K)	Competitive Proposals	Non- Competitive Proposals
<b>Pre-Solicitation</b>					
1. Scope					
2. Independent Cost Estimate					
3. Individual Procurement Plan					
4. Rationale for Contract Method (if not apparent)					
5. Rationale for Contract Type (if not apparent)					
6. Evaluation Plan					



# Independent Cost Estimate

## Independent Cost Estimate

An independent cost estimate has been conducted as required by 24 CFR 85.36 (f) 1 for the proposed construction contract.

Name of Proposed Work: \_\_\_\_\_

The basis for the independent cost analysis is:

- Examined the price paid in the most recent contract(s) and factored in inflation or changed market conditions.
- Detailed cost estimate



# Independent Cost Estiment

	Item	Cost
A.	Direct Labor	
B.	Fringe	
C.	Labor + Fringe (A + B)	
D.	Materials	
E.	Total Labor, Fringe, and Materials (C + D)	
F.	Contingency (10% of E)	
G.	Profit (10-20% of E)	
H.	Total (E + F + G)	

The estimated value of this contract (Line H): \_\_\_\_\_

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



# Example Procurement Checklist

Check the box for the procurement used:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Item: PO:	Micro Purchase (Less than \$10K)	Small Purchase (\$10K to \$250K)	Sealed Bid (> \$250K)	Competitive Proposals	Non- Competitive Proposals

Solicitation					
7. Sources (mailing lists, advertisements, etc.)					
8. Solicitation Notice and Amendments					
9. IFB/RFP					
10. Notes of Pre-Bid/Proposal Conferences					
11. IFB/RFP Correspondences					
12. Record of Bids/RFPs Requested (\$10K-\$25K can be verbal. Over \$25K to \$250K must be written)					
13. Quotes, Bids or Proposals Received					
14. Justification for Other than Full/Open Competition					





# Example Procurement Checklist

Check the box for the procurement used:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Item: PO:	Micro Purchase (Less than \$10K)	Small Purchase (\$10K to \$250K)	Sealed Bid (> \$250K)	Competitive Proposals	Non- Competitive Proposals

<b>Evaluation</b>					
15. Bid Opening					
16. Evaluation Panel Disclosures and Ethics Statement					
17. Technical Evaluation					
18. Price Evaluation					
19. Competitive Range Determinations					
20. Evaluation Report					
21. Memo of Negotiation and Selection Decision					
22. Pre-award Survey and Responsibility Determinations					
<b>Award</b>					
23. Contract and Award Documents					
24. Notification to Unsuccessful Bidders					
25. Appeals (all correspondence)					



# Example Procurement Checklist

Check the box for the procurement used:	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Item: PO:	Micro Purchase (Less than \$10K)	Small Purchase (\$10K to \$250K)	Sealed Bid (> \$250K)	Competitive Proposals	Non- Competitive Proposals

Post-Award and Contract Administration					
26. Insurance and Bonding Requirements					
27. Records of Post-Award Conferences					
28. Notice to Proceed					
29. Contract Modifications and Supporting Documentation					
30. Receiving Reports					
31. General Contract Correspondence					
32. Payment Record/Documentation					
33. Inspections and Field Reports					
34. Completion Certificate					



# Reasonable and Responsible



## CHECKLIST FOR DETERMINATION OF CONTRACTOR RESPONSIBILITY

Solicitation Number: \_\_\_\_\_

Contractor Name and Address: \_\_\_\_\_  
\_\_\_\_\_

Provide the following references:

1. List any East Georgia Housing Authority personnel the vendor has worked with on previous contracts:

<b>Employee</b>	<b>Project</b>
1.	
2.	
3.	



# Reasonable and Responsible

2. List references for agencies and companies doing business with the vendor.

Agency/Company	Contact Number	Contact Person	Description of Job Performed
1.			
2.			
3.			

3. List two financial and technical references for the vendor. One reference must be able to speak to the financial and credit worthiness of the vendor. A banker is preferred.

Reference Name	Reference Contact Number
1.	
2.	

4. List two State/local government agencies within jurisdictions you have contracted work. For example, if you did work in Richmond County, you could list the permit office.

Reference Name and Jurisdiction	Reference Contact Number
1.	
2.	





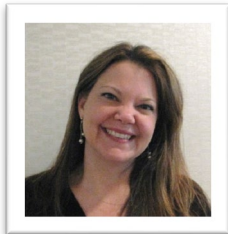
Sign up for our Listserv:  
<https://bit.ly/GaHOME-ARPListserv>

# Thanks!



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