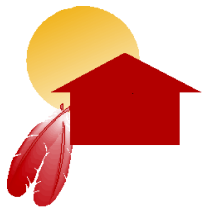
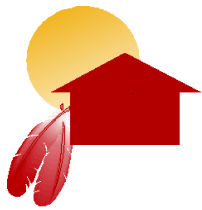


Table of Contents

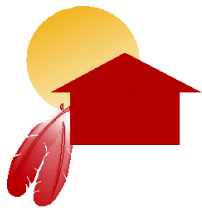
I.	Purpose	2
II.	Pre-Visit Preparation	4
III.	On-Site Review	5
IV.	Sealed Bids Method of Procurement	10
V.	Competitive Proposals Method of Procurement	13
VI.	Noncompetitive Proposals Method of Procurement	18
VII.	Small Purchase Method of Procurement	20
VIII.	Micro Purchases Method of Procurement	23
IX.	Contract Administration Review	24
X.	Summary	27



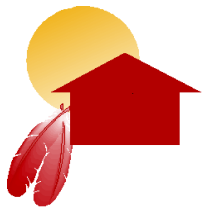
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
I. Purpose				
<p>The purpose of this monitoring plan is to determine if the recipient’s policies and procedures are in compliance with the applicable regulations on procurement, Indian Preference in procurement, and Section 3.</p> <p>The purpose of this review is to determine, through sampling, that: 1) all procurement transactions were conducted in a manner providing full and open competition, 2) the transactions were completed in a manner that prohibits the use of statutorily or administratively imposed local geographical preferences, 3) awards were made to responsible and responsive bidders, 4) sufficient records were maintained to detail the significant history of a procurement; 5) preference in the award of contracts and subcontracts was given to Indian organizations and Indian-owned economic enterprises; and 6) preference in the award of contracts and subcontracts and employment was given to low- and very low-income persons.</p> <p>The recipient is to maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.</p>	<p>2 CFR 200.318-326 24 CFR 1000.42 24 CFR 1000.52 24 CFR 1003.510 (ICDBG), 24 CFR Part 135 Sec. 7(b) of P.L. 93-638</p> <p>2 CFR 200.318(b)</p>	<p>ICDBG Grant Agreement</p> <p>Subarticle F of ROSS Grant Agreement</p> <p>Article I.D. of RHED/RIF Grant Agreement</p>		



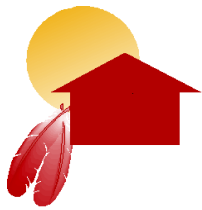
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<p>Section 7(b) of the Indian Self-Determination and Education Assistance Act provides that any contract, subcontract, grant, or subgrant pursuant to program requirements shall require that, to the greatest extent feasible, preference is given to Indian-owned economic enterprises.</p> <p>Section 3 of Housing and Urban Development Act of 1968 requires that employment and other economic opportunities generated by HUD programs shall, to the greatest extent feasible, and consistent with existing Federal, State, and local laws and regulations, be directed to low- and very low-income persons, particularly those who are recipients of government assistance for housing, and to business concerns which provide economic opportunities to low- and very low-income persons.</p> <p>NOTE: 2 CFR §200.110 Effective/applicability date.</p> <p>(a) ...For the procurement standards in §§200.317-200.326, non-Federal entities may continue to comply with the procurement standards in previous OMB guidance (superseded by this part as described in §200.104) for two additional fiscal years after this part goes into effect. If a non-Federal entity chooses to use the previous procurement standards for an additional two fiscal years before adopting the procurement standards in this part, the non-Federal</p>	<p>24 CFR 1000.52 24 CFR 1003.510 Sec. 7(b) of P.L. 93-638</p> <p>24 CFR 1000.42 24 CFR Part 135</p>	<p>ICDBG NOFA</p>		



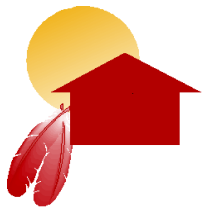
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
entity must document this decision in their internal procurement policies.				
II. Pre-Visit Preparation				
<p>A. If available, review the following documents:</p> <ol style="list-style-type: none"> 1. Most recent IHP/APR, approved IHP amendments, IHP amendments in process 2. Policies and procedures (see Section III for review instructions) 3. Previous monitoring findings in the areas of procurement, Indian preference, contract administration, and/or Section 3 4. Previous self-monitoring report(s) 5. Previous financial and OIG audit findings and/or work papers in the areas of procurement, Indian preference, contract administration, and/or Section 3 6. Corrective actions status for findings in any of these areas 7. Previous and current enforcement actions 8. Valid complaints in the areas of procurement, Indian preference, contract administration, and/or Section 3 9. Relevant correspondence regarding any of these areas 		IHP/APR (HUD-52737)		



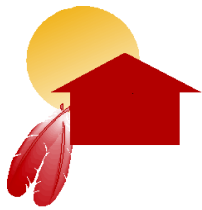
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
III. On-Site Review				
<p>A. The reviewer should select samples from each of the following: small purchases (less than \$250,000), micro purchases (less than \$10,000, if used), de minimus (less than \$5,000) sealed bids, competitive proposals, and noncompetitive proposals. Review the sampling methods in the General Instructions.</p>		General Instructions for Monitoring Plans		
<p>B. Is the recipient's procurement policy sufficiently detailed to ensure compliance with the regulations and provide general direction to staff? In addition:</p>	2 CFR 200.318(a)			
<p>1. Are there separate procedures established from the policy and do they reflect the details of how to perform specific tasks?</p>	2 CFR 200.319(c)			
<p>2. Does the policy include formal protest procedures to handle and resolve disputes relating to its procurement transactions?</p>	2 CFR 200.318(k)			
<p>3. Does the policy include a micro-purchase provision that allows the grantee to purchase goods or services with a value of less than \$10,000 and/or de minimus exception with value of less than \$5000 without seeking competitive quotations or applying Indian preference?</p>	24 CFR 1000.26(a)(11)(iii) NAHASDA 203(9) 2 CFR 200.320	Notice PIH 2013-22		



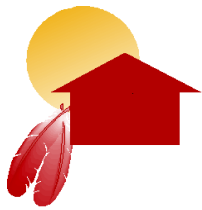
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
4. Does this policy contain language that clearly describes the method to be used and the documentation to be maintained to support each micro-purchase and/or de minimus purchase?				
C. Does the recipient's procurement policy and procedures include provisions that:				
1. Provide for review of proposed procurements to avoid purchase of unnecessary or duplicative items?	2 CFR 200.318(d)			
2. Encourage the use of federal excess, surplus, value engineering clauses, and intergovernmental agreements for procurement or use of common goods or services?	2 CFR 200.318(f) and (g)			
D. Does the recipient have a written code of conduct governing the performance of employees engaged in the award and administration of contracts, which includes, but is not limited to:	2 CFR 200.318(c)(1) 2 CFR 200.112			



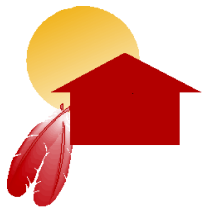
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
1. No employee, officer, or agent of the recipient shall participate in the selection, award, or administer a contract supported by federal funds if a conflict of interest, real or apparent, would be involved?	2 CFR 200.318(c)(1)			
2. A conflict would arise when an employee, officer, agent, or their immediate family, or partner has a financial or other interest in the firm selected for award?	2 CFR 200.318(c)(1)			
3. To the extent permitted by State or local law or regulations, such standards will provide for penalties, sanctions, or other disciplinary actions for violations?	2 CFR 200.318(c)(1)			
E. Does the recipient's procurement policy have protest procedures in place to handle and resolve disputes relating to its procurements?	2 CFR 200.318(k)			
1. Has the recipient settled all contractual and administrative issues arising out of procurements, including source evaluation, protests, disputes, and claims?	2 CFR 200.318(k)			
2. For all disputes that have arisen, has the recipient disclosed information regarding the protests to ONAP, if appropriate?				



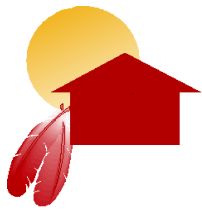
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
F. Does the recipient's procurement policy set the small purchase threshold at \$250,000 or less?	2 CFR 200.320(b)			
G. Does the recipient's procurement policy include a provision for micro purchases? De minimus purchases?	NAHASDA Sec. 203(g)			
H. Does the recipient give preference in the award of contracts to Indian organizations or enterprises by following one of the required methods:	24 CFR 1000.52 24 CFR 1003.510(d)			
1. Certified that its policies and procedures will provide preference in its procurement activities. If so,				
a. Are the policy and procedures consistent with the requirements of Section 7(b) of the Indian Self-Determination and Education Act?	24 CFR 1000.52(b)			
b. Was the policy previously approved by HUD?	24 CFR 1000.52c)(1)(i)			
c. If so, identify the date of HUD approval and method approved.				
2. Advertised for bids or proposals limited to Indian firms.	24 CFR 1000.52(c)(1)(i) 24 CFR 1003.510(d)(1)(i)			



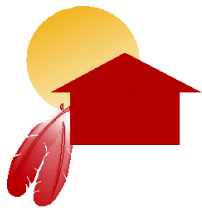
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
3. Used a 2-stage preference procedure.	24 CFR 1000.52(c)(1)(iii) 24 CFR 1003.510(d)(1)(ii)			
I. Does the recipient have procedures that comply with 24 CFR 1000.54 or 24 CFR 1003.510(e) for handling complaints that arise from the method they follow in providing for Indian preference?	24 CFR 1000.54 24 CFR 1003.510(e)			
NOTE: The recipient can choose to adopt procedures that meet or exceed the procedures described in 1000.54 or 1003.510(e). Do not make a finding based solely on the recipient not having its own compliant procedures because the recipient is already required to follow the procedures in 1000.54 or 1003.510(e).				
J. Does the recipient have either a separate policy on Section 3 or is it included in the procurement policy?	24 CFR Part 135 24 CFR 1000.42			
1. Do the policy and procedures provide preference in procurement consistent with the requirements of Section 3?	24 CFR Part 135 24 CFR 1000.42(a)&(c) 24 CFR 1000.48(c)			
2. Does the policy include a provision for the applicable thresholds?	24 CFR 135.3(a)(3) 24 CFR 1000.42(b)			



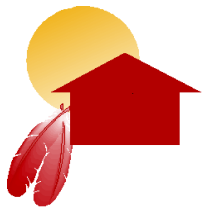
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
IV. Sealed Bids Method of Procurement				
This is the preferred method for procuring construction services. Invitations for Bids (IFB) are publicly solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for the public opening of the bids. The IFBs are to include any specifications and pertinent attachments and are to define the items or services in order for the bidder to properly respond. The firm-fixed-price type of contract is awarded to the lowest responsive and responsible bidder.	2 CFR 200.320(c)			
A. Select a sample of procurement transactions for construction services. Review the sampling methods in the General Instructions.	24 CFR 1000.503(b)(c)	General Instructions for Monitoring Plans		
B. Was the appropriate procurement method used for each procurement transaction?	2 CFR 200.320			
C. If errors were noted, determine whether the errors are an indication of a systemic problem or isolated incidents. (Note: ensure that an adequate number of procurements were sampled in order to render an opinion.)				
D. Did the recipient maintain adequate records in order to determine whether:	2 CFR 200.318(i)			
1. Cost or price analyses were conducted?	2 CFR 200.323(a)			
2. IFBs:				



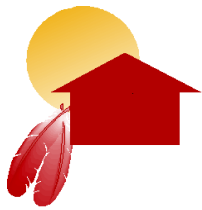
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
a. Were publicly advertised in a newspaper or other means that did not limit the number of bidders that would respond?	2 CFR 200.320(c)			
b. Clearly defined the items or services needed in order for the bidders to properly respond?	2 CFR 200.320(c)(2)(ii)			
c. Provided bidders with adequate time to respond?	2 CFR 200.320(c)(2)(i)			
d. Indian preferences were publicly announced in the advertisement and bidding solicitation?	24 CFR 1000.52(c)(4) 24 CFR 1003.510(d)(4)			
e. They followed their Indian preference policy?	24 CFR 1000.52(c)(1) 24 CFR 1003.510(d)			
f. Section 3 preferences were publicly announced in the advertisement and IFB and incorporated the Section 3 clause?	24 CFR 135.32 24 CFR 135.38 24 CFR 1000.42			
3. An adequate number of bids were obtained? (Note: there should be bids from at least two qualified bidders.)	2 CFR 200.320(c)(1)(ii)			



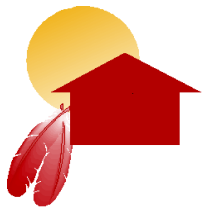
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<p>4. The recipient received less than two approvable bids? Did the grantee either: (1) re-advertise the contract, (2) open the solicitation to Indian <u>and</u> non-Indian contractors or (3) request Area Office approval to award the contract to the single bidder. If the grantee chooses option 2 for the next solicitation, and the process <u>still</u> results in only one approvable response, the grantee has met Indian preference requirements and may award the contract to the single bidder or offeror with no Area Office review or approval.</p>	<p>24 CFR 1000.52(b)(3) 24 CFR 1003.510(d)(2) & (3)</p>			
<p>NOTE: the procurement regulations only require awarding agency approval if the procurement is expected to exceed the small purchase threshold.</p>				
<p>5. The recipient conducted a public opening of the bids (attendance sheets included in files)?</p>	<p>2 CFR 200.320(c)(2)(iii)</p>			
<p>6. The bidders provided the bid bond or other assurances prior to bid opening?</p>	<p>2 CFR 200.325(a)24 CFR 1000.26(a)(12) 24 CFR 1003.501(a)(13)</p>			
<p>7. The recipient checked to ensure the contractors were not on the Limited Denial to Participate or Debarred lists?</p>	<p>2 CFR Part 2424 2 CFR Part 180 2 CFR 200.213 24 CFR 1000.44</p>			



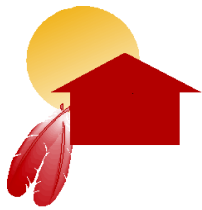
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
8. There were any instances of conflict of interest in the award of any contracts?	24 CFR 1003.608 2 CFR 200.318 (c)(1)&(2) 24 CFR 1000.30 24 CFR 1003.606			
9. Awards were made only to responsive and responsible contractors possessing the ability to perform the work successfully?	2 CFR 200.318(h)			
10. The recipient provided a rationale for contractor or vendor selection?	2 CFR 200.318(i)			
11. There were sound, documented reasons for every bid that was rejected?	2 CFR 200.320(c)(2)(v)			
V. Competitive Proposals Method of Procurement				
Under this method of procurement, offers are submitted from more than one source. This method is generally used when conditions are not appropriate for the use of sealed bids and is generally for professional services, such as consultants, attorneys, etc. Requests For Proposals (RFP) will be publicized and identify all evaluation factors and their relative importance and will be solicited from an adequate number of qualified sources.	2 CFR 200.320(d)			



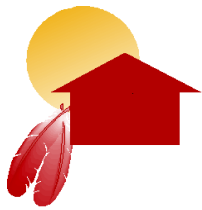
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
<p>Recipients are to have a method for conducting technical evaluations of the proposals received and for selecting awardees. Recipients are to award either a fixed-price or cost-reimbursement type contract to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered. Contingency arrangements are prohibited per 2 CFR Part 200 when recovery of the costs is from the federal government. Recipients may use competitive proposals procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services.</p>				
<p>A. Select a sample of procurement transactions for non-construction services. Review the sampling methods in the General Instructions.</p>	<p>24 CFR 1000.503(b)(c)</p>	<p>General Instructions for Monitoring Plans</p>		
<p>B. Was the appropriate procurement method used for each procurement transaction?</p>	<p>2 CFR 200.320</p>			
<p>C. If errors were noted, determine whether the errors are an indication of a systemic problem or isolated incidents. (Note: ensure that an</p>				



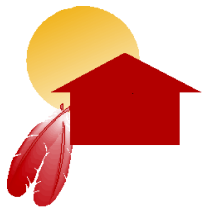
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
adequate number of procurements were samples in order to render an opinion.)				
D. Did the recipient maintain adequate records in order to determine whether:	2 CFR 200.318(i)			
1. Cost or price analyses were conducted?	2 CFR 200.323(a)			
2. RFPs:				
a. Were publicly advertised, whether in a newspaper or other means, that did not limit the number of firms that would respond?	2 CFR 200.320(c)(2)(i)			
b. Identified all significant evaluation factors, including price or cost, where required, and their relative importance?	2 CFR 200.320(d)(1)			
c. Indian preferences were publicly announced in the advertisement and RFP?	24 CFR 1000.52 23 CFR 1003.510(d)(4)			
d. If applicable, Section 3 preferences were publicly announced in the advertisement and RFP and incorporated the Section 3 clause?	24 CFR 135.32 24 CFR 135.38 24 CFR 1000.42 24 CFR 1003.510(a)(2)			
3. Were an adequate number of proposals obtained? (Note: there should be	2 CFR 200.320(d)(2)			



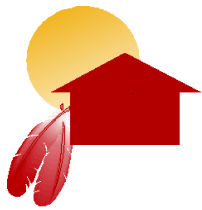
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
proposals from at least two qualified firms.)				
4. The recipient received less than two approvable proposals? Did the grantee either: (1) re-advertise the contract, (2) open the solicitation to Indian <u>and</u> non-Indian contractors or (3) request Area Office approval to award the contract to the single bidder or offeror. If the grantee chooses option 2 for the subsequent solicitation, and the process <u>still</u> results in only one approvable response, the grantee has satisfied HUD's Indian preference requirements and may award the contract to the single bidder or offeror with no Area Office review or approval.	24 CFR 1000.52(c)(2) 24 CFR 1003.510(d)(2) & (3)			
NOTE: the procurement regulations only require awarding agency approval if the procurement is expected to exceed the small purchase threshold.				
5. Did the recipient's records contain a method for conducting technical evaluations of the proposals received and for selecting awardees?	2 CFR 200.320(d)(3)			
6. Did the recipient's records include documentation of the basis for negotiation of a fair and reasonable price?	2 CFR 200.320(d)(5)			



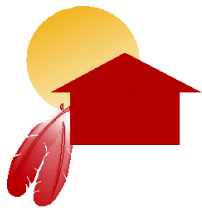
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
7. Do any of the proposals received include payment that is contingent upon recovery of the costs from the federal government (contingency arrangement)? Examples of contingency arrangements may be:	2 CFR 200.459			
a. The professional gets paid a percentage of any successes it achieves for the recipient, or				
b. The professional gets paid a fixed amount only for its successes.				
8. Does the documentation verify that only A/E professional services excluded price as an evaluation factor?	2 CFR 200.320(d)(5)			
9. Were there any instances of conflict of interest in the award of any contracts?	2 CFR 200.318(c)(1) 24 CFR 1000.30 24 CFR 1003.606			
10. Were awards made to responsive and responsible offerors whose proposals would be most advantageous to the recipient after price and other factors were considered?	2 CFR 200.320(d)(4)			
11. Did the recipient check to ensure the offerors were not on the Limited Denial to Participate or Debarred lists?	2 CFR Part 2424 2 CFR Part 180 2 CFR 200.213			



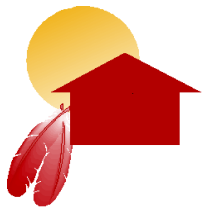
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
	24 CFR 1000.44 24 CFR 1003.608			
VI. Noncompetitive Proposals Method of Procurement				
<p>Noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate. This method may only be used when the award of a contract is infeasible under small purchase procedures, sealed bids, or competitive proposals. Also, it can only be used when the item is available only from a single source; the public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation; HUD authorizes noncompetitive proposals; or after solicitation of a number of sources, competition is determined inadequate. Recipients are required to conduct a cost analysis, i.e., verifying the proposed costs data, the projections of the data, and the evaluation of the specific elements of costs and profits. Also, HUD may require recipients to submit the proposed procurement for pre-award review.</p>	2 CFR 200.320(f)			
A. Determine whether the recipient awarded any contracts using the Noncompetitive Proposals method of procurement.				
B. Did the recipient maintain adequate records to determine whether:	2 CFR 200.318(i)			



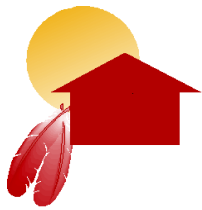
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
1. It was infeasible to use the small purchase, sealed bid, or competitive proposals method?	2 CFR 200.320(f)			
2. The item or service was available only from a single source?	2 CFR 200.320(f)(1)			
3. There was an emergency that would not allow a delay by using another method?	2 CFR 200.320(f)(2)			
C. Did review of the procurement actions indicate that any of the solicitations were too restrictive in competition (placing unreasonable requirements, requiring unnecessary experience and excessive bonding, etc.)? Also:	2 CFR 200.319(a)(1-7)			
1. Did ONAP authorize noncompetitive proposals? (If yes, stop here for this section.)	2 CFR 200.320(f)(3)			
2. Was competition inadequate after the recipient had solicited a number of sources?	2 CFR 200.320(f)(4)			
3. Did the recipient perform a cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation?	2 CFR 200.323(a)			



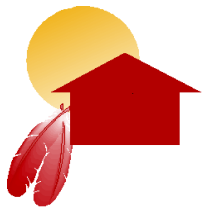
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
4. Were there any instances of conflict of interest in the award of any contracts?	2 CFR 200.318(c)(1) 24 CFR 1000.30 24 CFR 1003.606			
5. Did the recipient check to ensure the offerors were not on the Limited Denial to Participate or Debarred lists?	2 CFR Part 2424 2 CFR Part 180 2 CFR 200.213 24 CFR 1000.44 24 CFR 1003.608			
VII. Small Purchase Method of Procurement				
This method of procurement is used for securing services, supplies, or other property that do not cost more than \$250,000 (or whatever the recipient's policy sets as the threshold, provided it does not exceed \$250,000).	2 CFR 200.320(b) 2 CFR 200.88			
A. Determine what the recipient's small purchase threshold is set at.	2 CFR 200.88			
B. Select a sample of small purchases that were made using price or rate quotations. Review the sampling methods in the General Instructions.	24 CFR 1000.503(b) & (c)	General Instructions for Monitoring Plans		
C. Was the appropriate procurement method used for each item or service purchased?	2 CFR 200.330			



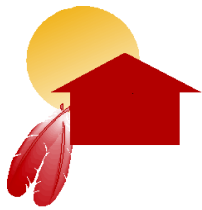
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
D. If errors were noted, determine whether they are an indication of a systemic problem or isolated incidents. (Note: ensure that an adequate number of procurements were sampled in order to render an opinion.)				
E. Did the recipient maintain adequate records in order to determine whether:	2 CFR 200.318(i)			
1. Requests for quotes:				
a. An adequate number of quotes were obtained?	2 CFR 200.320(b)			
b. To the greatest extent feasible, the recipient provided Indian preference?	24 CFR 1000.52(c) 24 CFR 1003.510(d)(3)			
c. To the greatest extent feasible, the recipient provided Section 3 preference?	24 CFR Part 135			
d. For professional services, any of the proposals include payment that is contingent upon recovery of the costs from the federal government (contingency arrangement)? Examples may be:	2 CFR 200.459			
(1) The professional gets paid a percentage of any success it achieves for the recipient, or				



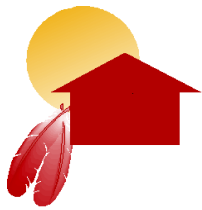
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
(2) The professional gets paid a fixed amount only for its successes.				
3. Awards were made only to responsible contractors or vendors possessing the ability to perform the work successfully?	2 CFR 200.318(h)			
4. If the recipient provided a rationale for contractor or vendor selection or rejection?	2 CFR 200.318(i)			
5. If there were any instances of conflict of interest in the award of any contracts?	2 CFR 200.318(c)(1) & (2) CFR 1000.30 24 CFR 1003.606			
6. Did the recipient check to ensure the suppliers or contractors were not on the Limited Denial to Participate or Debarred lists?	2 CFR Part 2424 2 CFR Part 180 2 CFR 200.213 24 CFR 1000.44 24 CFR 1003.608			
7. Does it appear that the recipient is breaking down requirements of a purchase for the purpose of bid splitting to avoid the requirements that apply to larger purchases?	2 CFR 200.318(d)			



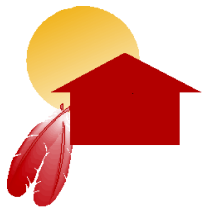
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
VIII. Micro Purchases Method of Procurement				
This method of procurement may be used for the purchases of goods or services with a value of less than \$10,000 and/or De Minimus purchases (less than \$5,000).. The intent of micro purchasing is to reduce the burden of complying with the federal procurement process for goods and services of minimal cost. The provision allows the recipient the ability to purchase without soliciting competitive quotations if the price is considered reasonable.	NAHASDA Sec. 203(g) 24 CFR 1000.26(a)(11)(1) 2 CFR 200.67 2 CFR 200.320(a)			
A. Has the recipient adopted a Micro Purchase and/or DeMinimus purchase procurement clause in its Procurement Policy? If no, skip to next section.				
B. Select a sample of micro purchases that were made. Review the sampling methods in the General Instructions.		General Instructions to Monitoring Plans		
1. Is the amount the recipient determined in its policy within the \$10,000 limit for micro-purchase or \$5,000 limit for DeMinimus purchase?				



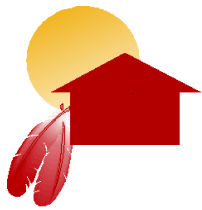
RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
2. Does the policy clearly describe the method to be used and the documentation to be maintained to support the action?	2 CFR 200.318(i)			
3. Was the procurement or contracting officer's signature on the micro-purchase purchase order to signify that the cost has been determined to be reasonable?	2 CFR 200.303			
C. Does it appear that the recipient is breaking down requirements of a purchase for the purpose of bid splitting to avoid the requirements that apply to larger purchases?	2 CFR 200.318(d)			
IX. Contract Administration Review				
<p>Recipients are to maintain a contract administration system which ensures that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders. Recipients are required to perform a cost or price analysis for contract modifications. Recipients will negotiate profit as a separate element of the price for each contract in which there is no price competition and in all cases where a cost analysis is performed. The cost plus a percentage of cost and percentage of construction cost methods of contracting are not allowed. Contracts with contingency arrangements are also prohibited when recovery of the costs are from the federal government.</p>	<p>2 CFR 200.323 2 CFR 200.318(b) & (i)</p>			



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
For construction or facility improvement contracts over the small purchase threshold, the recipient must require bonding from its contractors to ensure that HUD’s interest is adequately protected. The recipient’s contracts must contain all the provisions required, including those for Indian preference and Section 3.				
A. Is a review of the recipient’s technical specifications on proposed procurements needed to ensure that the item and/or service specified is the one being proposed for purchase? If no, go to item C, below.	2 CFR 200.324(a)			
B. If yes, did the recipient provide these documents?	2 CFR 200.324(a)			
C. Does the recipient have an executed contract for every service or item acquired under the Sealed Bid, Competitive Proposals, or Noncompetitive Proposals method of procurement?	2 CFR 200.62 2 CFR 200.318(i)			
D. Do the applicable contracts, purchase orders, and solicitations contain all the required provisions, including those for Indian preference and Section 3?	24 CFR 1000.52(c)(6) 24 CFR 1003.510(d)(6)(i) – (iv) 24 CFR 135.38			



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
Note: Section 3 is triggered when construction and rehab projects create the need for new employment, contracting, or training opportunities.	2 CFR 200 Appendix II			
E. Is there documentation verifying that Section 3 requirements were followed, if applicable, by the grantee, contractor, and/or subrecipient if new staff were hired. Section 3 not required if no new staff were hired for the grant.	24 CFR Part 135			
F. If the recipient used the Small Purchase method of procurement:				
1. Did the contract modification increase the contract amount by more than the recipient's small purchase threshold?				
2. If so, did the recipient send the contract modification in for ONAP's review and approval, if requested?	2 CFR 200.324(b)(5)			
F. Has the recipient required some type of bonding from the contractors?	2 CFR 200.325 24 CFR 1000.26(a)(12) 24 CFR 1003.501(a)(13)			
G. Has the recipient awarded any cost plus percentage of cost or percentage of construction cost type contracts?	2 CFR 200.323(d)			
H. Is there evidence that the recipient monitors the contractor's performance to ensure compliance				



RECIPIENT NAME:	<u>Regulatory/ Statutory Citation</u>	<u>Other Tools</u>	<u>Ref. Pg.</u>	<u>Remarks</u>
with the contractor's terms, conditions, and specifications of their contract or purchase order?				
X. Summary				
<ul style="list-style-type: none"> A. Summarize the results of the review in a work paper. B. Discuss significant issues with GE Director. C. Develop findings, including questioned costs and corrective actions, as appropriate. D. Develop concerns because they could lead to a violation E. Develop report language, including any findings and concerns. F. If there are any major issues identified in this review and the recipient has approval to invest, determine if a withdrawal of investment authority should be recommended. 				

Reviewer Name:	
Review Date(s):	
GE Director's Name:	