

East Greenwich Housing Authority Board of Commissioners
Regular Meeting
Monday, November 13, 2023, 5:30PM
EG Housing Authority Administrative Office
146 First Avenue, East Greenwich, RI 02818

Agenda

- Chair calls meeting to order and roll call is taken.
 - **Note: Two members of the EGHA Board will be participating remotely with renewed OMA Compliant waivers**
- Public Comment
- Approval of Minutes (For vote)
 - September 11, 2023 (Regular Meeting)
- Monthly Management Report (For discussion)
 - Update on Occupancy & Rental income
 - September 2023
 - October 2023
- 2024 Fair Market Rents (For Vote)
 - Requesting Board Approval to use the newly published FMR's effective 1/1/2024.
- HCV Shortfall (For Discussion)
- Nominations (For Vote)
 - Chair
 - Vice Chair
- Updated Procurement Policy (For Possible Vote)
- Buyback of Staff PTO (For Vote)
- 165 Duke Street (For Discussion)
- Executive Director Update
 - High Performer
 - Town adopting Housing Families
 - EGHA staff on Town Wellness Committee
 - Fair Housing Training
 - Letter from HUD to SS resident
 - Bedbugs
 - COVID
- Executive Session (For Possible Vote)
 - Pursuant to (R.I. Gen. Laws § 42-46-5(a)(5)) as it relates to the acquisition or lease of real property for public purposes, or of the disposition of publicly held property wherein advanced public information would be detrimental to the public interest, the Board may vote to enter executive session.
- Adjourn (For Vote)

The next meeting is scheduled for December 11, 2023, at 5:30pm.

Members of the public wishing to access the meeting virtually, should contact the executive director, Tracy Johnson, at tjohnson@eghousing.com or call (401) 885-2610 ext. 13 in advance of the meeting and a link will be forwarded. Posted on November 8, 2023, at the EGHA Administrative Office, Shoreside Apts., EGHA website, RI SOS website.

**MINUTES
HOUSING AUTHORITY OF THE
TOWN OF EAST GREENWICH
146 FIRST AVENUE
EAST GREENWICH, RI 02818
REGULAR MEETING
MEETING HELD at EGHA Administrative Office
146 First Avenue, East Greenwich RI, 02818**

**DATE: September 11, 2023
5:30PM**

MEMBERS PRESENT: Cynthia White Overton, Chair
Ruth Feder, Vice Chair
Elizabeth Grumbach, Commissioner
Stanley Olszewski, Commissioner

MEMBERS ABSENT: None

OTHER ATTENDEES: Tracy Johnson, Executive Director

CALL TO ORDER: Chair called the meeting to order at 5:42 pm

PUBLIC COMMENT: No members of the public attended.

Chair Overton stated for the record that two members of the EGHA Board are participating remotely with renewed waiver through OMA.

**APPROVAL OF THE MINUTES
OF THE JULY 2023
REGULAR MEETING**

Commissioner Olszewski made motion to approve the minutes of the July 10th, 2023, regular meeting, seconded by Commissioner Grumbach and approved by Commissioners Feder, Grumbach Overton & Olszewski

**In Favor: Commissioners Feder, Olszewski, Overton, Grumbach
Opposed: None
Abstained: None**

**MONTHLY MANAGEMENT REPORT
JULY & AUGUST**

Tracy provided an update on occupancy, rent, and has recently added legal updates to the MMR. We are having some progress filling in the units, Marlborough Street will be fully occupied in October; and Regal Court is now fully occupied. Tracy discussed an eviction in PH that took a turn in the last week. The tenant left owing almost \$1300. As maintenance was cleaning out the units, in hazmat suits, a cat was found hidden in a bedroom closet. Police & Animal control were called; maintenance kept the cat for the night (would have been brought to NK Animal Hospital the following day) but when the cat showed signs of internal issues, maintenance spoke with animal control to immediately bring to Ocean State Emergency. There is a warrant for the tenant; and we do not know the status of the cats health. Chair Overton stated she likes this new item in MMR; should the Board ever be questioned about evictions or issues; they can have general information.

SECTION 8 RENT REASONABLENESS CONTRACT

Commissioner Grumbach made a motion to approve contracting with NELROD for their EZ Rent Reasonable Services; seconded by Commissioner Feder and approved by Commissioners Grumbach, Overton, Feder & Olszewski.

In Favor: Commissioners Feder, Olszewski, Overton, Grumbach

Opposed: None

Abstained: None

2023 OP FUND

Commissioner Grumbach made a motion to approve accepting HUD operation funds in the amount of \$299,384; seconded by Commissioner Feder and approved by Commissioners Overton, Grumbach, Olszewski & Feder

Discussion: Tracy explained that these funds are used to run the Public Housing program. Utilities, maintenance etc. EGHA received \$205,990 last year.

In Favor: Commissioners Feder, Olszewski, Overton, Grumbach

Opposed: None

Abstained: None

EXECUTIVE DIRECTOR UPDATE

Due to SS & RC having bouts of COVID & Flu, staff discussed doing the prepared meals again this year. Future events will require some long term planning on how we can hold dinners. It was suggested to possibly have carolers come to the buildings and provide some snacks rather than a meal.

Tracy reviewed the sewer pipe video of its condition before the replacement. The plumber and Pete Demer spent the day digging up the tile then cement floor, removing and replacing the rotted pipe, and they re-laying the cement in the area. Since the fix, the unit repeatedly having the issue did not report a problem.

Tracy mentioned that the Groundbreaking for the Frenchtown Road Property is now scheduled to take place Friday, October 13, 2023, at 10am.

Tracy mentioned that there has been an influx in calls & visits from individuals who are up for units at Brookside Terrace, and immediately assume they will be receiving a voucher. Several staff have had people yelling at them, HUD has called EGHA inquiring about the situation because applicants have stated they are being discriminated against. The Board discussed options for the voicemails of EGHA staff, and signage to state that EGHA & Brookside are two separate entities. Vice Chair Feder stated that Cove Homes is looking into a PR person, perhaps they would be helpful in this matter too.

HUD Correspondence-We received a letter about an inquiry they received from a Marlborough Street tenant requesting a washer/dryer.

EXECUTIVE SESSION: Cancelled

AJOURN

Commissioner Feder made a motion to adjourn at 6:39p; seconded By Commissioner Grumbach

EG HOUSING AUTHORITY MONTHLY MANAGEMENT REPORT AS OF SEPT 30, 2023

Occupancy and TARS

Facility	Occupancy	Intent to Vacate	This month UTOs	YTD UTOs	Rent	Wait List	Work orders	Updated Rent Roll to Accounting
PH	24 of 28	0	0	2	98%	28	6	Happy
HP 1	2 of 3	0	0	0	98%	9,500	0	Happy
Shoreside	101 / 106	0	0	0	95%	1bd -61 2bd -3	35	One-Site
Regal	35 / 35	0	0	0	100%	9,500	6	One-Site
CH	13 of 16	0	0	0	96%	9,500	0	Happy
EGHA (2880)	8 of 10	0	0	0	95%	9,500	1	Happy
EGHA (Marl)	4 of 5	0	0	0	100%	9,500	2	Happy

Rent collection: 97.4 % (households) Occupancy: 92.1 %

	Current Month	Previous Month
Total Allocation	292	292
# Leased	1	109
Utilization rate	47%	47%
Voucher Issuance	1	1
% of HUD HAP expended	100%	100%
# Porting in	0	0
# Porting out	0	1
# On wait list	9,500	8,866
# Homeowner	0	292

Resident Services

Service	This Month	Previous Month
Service Units: Medical	0	0
Benefits & personal assistance	0	0
Quality of Life	2	0
FSS	20	19

Inspections: Completed Scheduled

Annual (Cove/HP/PH)	6	16
Housekeeping	0	
HCV	6	16
Shoreside		
Regal Court	0	1
Complaint		
Pre-Reac		

CH		6
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Paint		
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet seat		
Shades/Blinds		
PH		42
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Thermostat	1	
Door Handles		
Ceiling Lights		
Faucets		
Hood vent/garbage disposal		
Light Bulbs		
Showerheads		
Smoke/CO Detector	2	
Shades/Blinds	8	
Toilet		
RC		27
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Light Bulbs		
Faucets		
Hood vent/garbage disposal		
Filters	4	
Showerheads		
Smoke/CO Detector	1	
Thermostat		
Toilet Seats		
HP1		
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Paint		
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet		
EGHA Fee (2880/Marlborough)		5
Appliance		
Cabinet/Vanity/Toilet		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Toilet Seats		
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet		

Monthly Notes:

Signed 1 FSS participant in September.

Back to school event- 5 families participated

	Empty		
SS	504	Oct 11 MI	Dave M
	508	Oct 16 MI	Jen T
	510	(need window work)	
	608	Nov 1 Darek R (need to install blinking smoke Dect)	
	216	unit transfer from 104	

Monthly Legal Report

<u>Program</u>	<u>#'s</u>	<u>Program Violation(s)</u>
HCV:		
	1	Unreported income failure to complete recertification
PH:		
CH:		
HP1		
SS/RC: 2(SS)		smoking
1 (SS)		HEMP

EG HOUSING AUTHORITY MONTHLY MANAGEMENT REPORT AS OF OCTOBER 31, 2023

Occupancy and TARS

Facility	Occupancy	Intent to Vacate	This month UTOs	YTD UTOs	Rent	Wait List	Work orders	Updated Rent Roll to Accounting
PH	24 of 28	0	0	2	96%	28	1	Happy
HP 1	2 of 3	0	0	0	98%	9,911	1	Happy
Shoreside	103 / 106	0	0	0	97%	1- 64 2- 3	25	One-Site
Regal	35 / 35	0	0	0	100%	9,911	3	One-Site
CH	13 of 16	0	0	0	96%	9,911	0	Happy
EGHA (2880)	8 of 10	1	0	0	95%	9,911	0	Happy
EGHA (Marl)	4 of 5	0	0	0	98%	9,911	0	Happy

Rent collection: 97% (households)

Occupancy: 93.2%

	Current Month	Previous Month
Total Allocation	292	292
# Leased	0	1
Utilization rate	47%	47%
Voucher Issuance	0	1
% of HUD HAP expended	100%	100%
# Porting in	0	0
# Porting out	1	0
# On wait list	9,911	9,500
# Homeowner	0	0

Resident Services

Service	This Month	Previous Month
Service Units: Medical	0	0
Benefits & personal assistance	0	0
Quality of Life	0	0
FSS	20	20

Inspections: Completed Scheduled

Annual (Cove/HP/PH)	2	1
Housekeeping		
HCV	4	7
Shoreside	0	31
Regal Court		
Complaint		
Pre-Reac	35	

CH		10
Appliance	1	
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Filters	3	
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet seat		
Shades/Blinds		
PH		55
Appliance	1	
Cabinet/Vanity		
Carpet/Vinyl		
Painting	2	
Thermostat	3	
Door Handles		
Ceiling Lights		
Faucets		
Filters	2	
Light Bulbs	5	
Showerheads		
Smoke/CO Detector		
Shades/Blinds		
Toilet		
RC		32
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Light Bulbs	2	
Faucets		
Hood vent/garbage disposal		
Filters	3	
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet Seats		
HPI		
Appliance		
Cabinet/Vanity		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting		
Faucets		
Hood vent/garbage disposal		
Paint		
Showerheads		
Smoke/CO Detector		
Thermostat		
Toilet		
EGHA Fee (2880/Marlborough)		17
Appliance		
Cabinet/Vanity/Toilet		
Carpet/Vinyl		
Countertop		
Doors		
Electrical/Lighting	1	
Ceiling lights	4	
Hood vent/garbage disposal		
Toilet Seats		
Showerheads	1	
Smoke/CO Detector		
Thermostat		
Blinds	6	

Monthly Notes:

510 (need window work)
608 Nov 1 Darek
216 unit transfer from 104

Monthly Legal Report

<u>Program</u>	<u>#'s</u>	<u>Program Violation(s)</u>
HCV:	2	Un-Reported Income Failure to continue to pay Repayment Plan for un-Reported Income

PH:

CH:

HP1

SS/RC:

1 (SS) Smoking
1 (SS) HEMP – no communication from Tenant requesting an
RA after HUD letter received.

Market Area Setup

General

Market Area Key	<u>9</u>	Status	<u>Active</u>
Market Area Name	<u>Default Market Area 2022</u>		
Description	<u></u>		
HUD Area Name	<u>Providence-Fall River, RI-MA HUD Metro FMR Area</u>		
HUD Area Code	<u>METRO39300M39300</u>		
PS Reduction Type	<u>Hold Harmless</u>		
Reduction %	<u></u>		
Administrative Fees	100%	Proration %	Amount
	<u>\$90.00</u>		<u>(First 600 Units)</u>
	<u>\$90.00</u>		<u>\$72.00 (Remainder of Units)</u>

Small Area Fair Market Rent/ Payment Standard

HUD Effective Date	<u>10/1/2023</u>	PHA Effective Date	<u>1/1/24</u>											
	SA-0	SA-1	SA-2	SA-3	SA-4	SA-5	SA-6	PS-0	PS-1	PS-2	PS-3	PS-4	PS-5	PS-6
02818	\$1,650	\$1,790	\$2,170	\$2,620	\$3,250	\$3,738	\$4,225	\$1,815	\$1,969	\$2,387	\$2,882	\$3,575	\$4,111	\$4,647



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING
Quality Assurance Division
HCV Shortfall Prevention Team

September 11, 2023

Tracy Johnson, Executive Director
East Greenwich Housing Authority
146 First Avenue
East Greenwich, RI 02818

Dear Ms. Johnson:

This is your official notification of the Shortfall Prevention Team's (SPT) confirmation of a projected shortfall in your **HCV Program** for CY 2023. The currently available data indicates it is prudent that your HCV Program take some cost savings measures given the potential shortfall. If you comply with all the conditions of this letter and are still projected to have a shortfall later in CY 2023, you will be eligible for any Category 1 Set-Aside funds that may be available to prevent the termination of HCV participants due to insufficient funds.

Under PIH Notice 2023-07, we are making eligibility for any available shortfall HAP Set-Aside funds contingent on your PHA taking the actions outlined below by **September 11, 2023**, to minimize the shortfall funding required. You are required to take the following reasonable cost-savings measures in order to be eligible for the HAP Set-Aside funding made available in the final 2023 appropriation to prevent the termination of families due to insufficient funding:

1. Cease issuing vouchers to applicants. This requirement does not apply to the following:
 - Families that are participants and were issued a voucher to move to a different unit.
 - **Vouchers issued to avert a reduction in leasing due to program attrition.** The PHA must manage the issuance of these vouchers so that the PHA does not exceed the number of units leased at the time of the SPT-confirmed shortfall and any additional units that are also authorized to be leased in accordance with these requirements. **In general, a PHA may reissue the turnover voucher to a family from the PHA waiting list** except for eligible VASH turnovers where a referral is provided by the Veterans Administration Medical Centers (VAMC). **PHAs may use the voucher to absorb a family under portability** or PHAs may issue turnover vouchers to a family moving from a Project-Based Voucher (PBV) unit in accordance with 24 CFR 983.261. However, a PBV family that has the right to move in accordance with 24 CFR 983.261 and wishes to do so has priority for the turnover voucher.
 - Instances in which the PHA is leasing under the HUD-VASH program up to the baseline level of units under all HUD-VASH allocations (not just recent allocations), including turnover of HUD-VASH vouchers.
 - Vouchers issued to program applicants under special purpose voucher increments awarded in CY 2022 or CY 2023. These special purpose vouchers include Family Unification Program (FUP), Non-Elderly Disabled (NED), Foster Youth to Independence (FYI), and Tenant Protection vouchers initially awarded in 2022 and/or 2023, to include set-aside funding.

- Vouchers issued to applicants moving into Project-Based Voucher (PBV) units to allow the PHA to meet its contractual obligation to fill PBV AHAP units being placed under HAP for the first time and PBV units currently under HAP that are vacated by program participants.
 - PBVs under the Rental Assistance Demonstration (RAD), in their first full year of funding through the HCV Program.
 - Vouchers issued pursuant to the settlement of litigation (“Litigation Vouchers”) against a PHA. PHAs must request approval to continue leasing Litigation Vouchers and submit supporting documentation. HUD will review and decide on a case-by-case basis using the supporting documentation received as the basis for the decision.
 - Vouchers issued using funds awarded under the Lower-than-Average Leasing HAP Set-Aside category.
 - The Secretary reserves the right to consider additional exceptions on a case-by-case basis.
2. **Cease absorbing portable vouchers, unless absorbing as a turnover voucher as described in the second bullet point above.**
 3. Implement all other cost saving measures identified by the SPT on your action plan within the timeframe specified in the action plan.

Failure to comply with the requirements above will affect your eligibility for any shortfall Set-Aside funds made available for CY 2023. If at any time during the year, we determine that your PHA is no longer in need of HAP Set-Aside funding to prevent the termination of families, your PHA may resume leasing activities. I will confirm this status for you in writing.

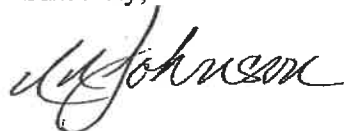
The SPT projected your funding shortfall using the Two-Year Projection Tool (TYT) and a copy of the tool demonstrating your projected shortfall is enclosed for your records. Should your PHA wish to receive any potential HAP Set-Aside funding, you will need to submit an application via DocuSign for those funds in addition to taking the cost cutting measures listed above. The application is available as Appendix F within PIH Notice 2023-07 published April 4, 2023.

Instructions on applying to the HAP Set-Aside through DocuSign, a link to the video tutorial on the DocuSign application process, as well as links to the DocuSign application forms by category can all be accessed through the following link:

<https://www.hud.gov/sites/dfiles/PIH/documents/HCVSetAsideApplicantDocuSignInstructions.pdf>.

Lastly, a blank Two-Year Tool and Step-by-Step Guide can be found by choosing this link to the [Office of Housing Choice Vouchers](#) website. If you have any questions, please contact me, your SPT specialist, at Nehemiah.A.Johnson@hud.gov.

Sincerely,



Nehemiah A. Johnson
Quality Assurance Division
HCV Shortfall Prevention Team

Enclosure

RI024 HCV Leasing and Spending Projection - The Goods

PHA Name		PHA Number		RI024		Utilization Report:		HCV Utilization Report June 2023		Print																																																																																																																																																																																																																						
East Greenwich Housing Authority		PHA Number		RI024		Save		Access Additional Tools		Disclaimer																																																																																																																																																																																																																						
<p align="center">ACC/Funding Information</p> <table border="1"> <thead> <tr> <th>ACC</th> <th>Current Year (2023)</th> <th>Year 2 (2024)</th> <th>Year 3 (2025)</th> <th>Funding Proration/Offset Levels</th> <th>Success Rate</th> <th>Annual Turnover Rate</th> <th>Program Projection Variables</th> </tr> </thead> <tbody> <tr> <td>Beginning ACC Vouchers</td> <td>292</td> <td>292</td> <td>292</td> <td>HAP</td> <td>80%</td> <td>3.8%</td> <td>EOP Rate as of 7/31/2023 (5 TB,PB EOPs): 4.17%</td> </tr> <tr> <td>Funding Commitments</td> <td>Current Year (2023)</td> <td>Year 2 (2024)</td> <td>Year 3 (2025)</td> <td>Year 2 (2024) % Excess Reserves Offset</td> <td>Time from Issuance to HAP Effective Date (Current: 2.28 months)</td> <td></td> <td></td> </tr> <tr> <td>Initial BA Funding (not offset)</td> <td>\$1,346,738</td> <td>\$1,545,657</td> <td>\$2,263,739</td> <td>Year 2 (2024) % Excess Reserves Offset</td> <td>% leased in 30 days</td> <td></td> <td></td> </tr> <tr> <td>Offset of HAP Reserves</td> <td>\$10,268</td> <td>\$0</td> <td>\$0</td> <td>Year 3 (2025) % Excess Reserves Offset</td> <td>% leased in 30 to 60 days</td> <td></td> <td></td> </tr> <tr> <td>Set Aside Funding</td> <td>\$0</td> <td></td> <td></td> <td>Administrative Fees</td> <td>% leased in 60 to 90 days</td> <td></td> <td></td> </tr> <tr> <td>New ACC Units Funding</td> <td>\$0</td> <td>\$0</td> <td>\$0</td> <td>Year 1 (2023)</td> <td>% leased in 90 to 120 days</td> <td></td> <td></td> </tr> <tr> <td>Total ABA Funding Provided</td> <td>\$1,346,738</td> <td>\$1,545,657</td> <td>\$2,263,739</td> <td>Year 2 (2024)</td> <td>% leased in 120 to 150 days</td> <td></td> <td></td> </tr> <tr> <td>PHA Income</td> <td>\$1,906</td> <td>\$0</td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>Total Cash-Supported Prior Year-End Reserves</td> <td>\$121,000</td> <td>\$0</td> <td>\$0</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td colspan="8"> <p align="center">HUD-Held Reconciliation - 12/31/2022 Cash Sufficiency Check</p> <table border="1"> <thead> <tr> <th>HUD-estimated Reserves Net Pooling</th> <th>HUD-established CYE HHR</th> <th>HUD-established CYE HHR</th> </tr> </thead> <tbody> <tr> <td>(\$39,684)</td> <td>\$121,000</td> <td>\$160,684</td> </tr> <tr> <td>HUD-Reconciled (May Override)</td> <td>Lower of H17/17 (May Override)</td> <td>HUD-established CYE HHR</td> </tr> <tr> <td>\$121,000</td> <td>\$121,000</td> <td>PHA-Held Cash (VMS)</td> </tr> <tr> <td></td> <td></td> <td>HUD-Reconciled (Cash Collected)</td> </tr> <tr> <td></td> <td></td> <td>Lower of H17/17 (May Override)</td> </tr> <tr> <td></td> <td></td> <td>HUD-Reconciled RNP v PHA-Reported RNP</td> </tr> <tr> <td></td> <td></td> <td>HUD v PHA difference (\$39,027.00) or 32.6% of Eligibility</td> </tr> <tr> <td></td> <td></td> <td>HUD-Reported RNP</td> </tr> <tr> <td></td> <td></td> <td>EOY VMS RNP</td> </tr> <tr> <td></td> <td></td> <td>HUD-estimated RNP</td> </tr> <tr> <td></td> <td></td> <td>(\$39,684)</td> </tr> </tbody> </table> </td> </tr> <tr> <td colspan="8"> <p align="center">Total Funding</p> <table border="1"> <thead> <tr> <th>Total Funding Available</th> <th>Admin Fees Earned (PY)</th> <th>Expense</th> </tr> </thead> <tbody> <tr> <td>\$1,469,644</td> <td>\$162,093</td> <td>\$177,179</td> </tr> <tr> <td></td> <td></td> <td>Expense %</td> </tr> <tr> <td></td> <td></td> <td>109.3%</td> </tr> </tbody> </table> </td> </tr> <tr> <td colspan="8"> <p align="center">Administrative Fees Analysis</p> <table border="1"> <thead> <tr> <th>Admin Fees Earned (PY)</th> <th>Expense</th> </tr> </thead> <tbody> <tr> <td>\$162,093</td> <td>\$177,179</td> </tr> <tr> <td></td> <td></td> </tr> </tbody> </table> </td> </tr> <tr> <td colspan="8"> <p align="center">End of Year 3 Results (2025)</p> <table border="1"> <thead> <tr> <th>Projected Total HAP Reserves</th> <th>Projected Total HAP Reserves - 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RI024 has a cost per UML of \$144.69 compared to its Earnings/UML & Size peer group of \$38.04 (a difference of 69.5%) and its state peer group (of all PHAs in the state) of \$112.60 (a difference of 22.1%).

Based on the most recent, official (end of fiscal year) UML, RI024 has a projected 2023 Calendar Year-End (CYE) UML of \$51,460 (or 31.7% of CY 2023 Earned Admin Fees) and a 2024 CYE UML of \$36,364 (or 26.6% of CY 2024 Earned Admin Fees).

RI024 HCV Leasing and Spending Projection - The Goods

2023	UMAs	Actual UMLs	Actual HAP	Vouchers Issued/Projected to be Issued	Other Planned Additions/Reductions	New Leasing from Issued Vouchers	Estimated Attention	UMLs: Actual/Projected	HAP: Actual/Projected	PUC: Actual/Projected	Manual PUC Override	Year-to-Date UML %	Year-to-Date ABA Expanded %	Monthly UML %	Monthly ABA Expanded %
Jan-23	292	117	\$110,201					117	\$110,201	\$942		40.1%	97.5%	40.1%	97.5%
Feb-23	292	118	\$120,687					118	\$120,687	\$1,024		40.2%	102.2%	40.4%	106.9%
Mar-23	292	118	\$125,752					118	\$125,752	\$1,066		40.3%	105.2%	40.4%	111.2%
Apr-23	292	118	\$127,299					118	\$127,299	\$1,079		40.3%	107.0%	40.4%	112.6%
May-23	292	110	\$121,538					110	\$121,538	\$1,105		39.8%	107.1%	37.7%	107.5%
Jun-23	292	108	\$124,677					108	\$124,677	\$1,154		38.9%	107.6%	37.0%	110.3%
Jul-23	292	106	\$122,705	7				106	\$122,705	\$1,158		38.9%	107.8%	36.3%	108.5%
Aug-23	292	109	\$127,474					109	\$127,474	\$1,169		38.7%	108.4%	37.3%	112.7%
Sep-23	292	0	\$0			2	-0.3	111	\$133,627	\$1,205	\$1,205	38.6%	109.5%	38.0%	118.7%
Oct-23	292	0	\$0			2	-0.4	113	\$139,623	\$1,241	\$1,241	38.6%	110.9%	38.6%	123.6%
Nov-23	292	0	\$0			0	-0.4	113	\$143,934	\$1,279	\$1,279	38.6%	112.4%	38.5%	127.3%
Dec-23	292	0	\$0			0	-0.4	112	\$147,740	\$1,317	\$1,317	38.6%	113.9%	38.4%	130.6%
Total	3,504	904	\$990,533	7	0	5	-1.4	1,352	\$1,545,657	\$1,143		38.6%	113.9%		
2024															
Jan-24	292					0	-0.4	112	\$153,215	\$1,370	\$1,370	38.3%	119.0%	38.3%	119.0%
Feb-24	292					0	-0.4	111	\$158,893	\$1,425	\$1,425	38.2%	121.2%	38.2%	123.4%
Mar-24	292					0	-0.4	111	\$164,782	\$1,483	\$1,483	38.2%	123.4%	38.1%	127.9%
Apr-24	292					0	-0.4	111	\$170,869	\$1,543	\$1,543	38.1%	125.7%	37.9%	132.7%
May-24	292					0	-0.4	110	\$177,222	\$1,605	\$1,605	38.1%	128.1%	37.8%	137.6%
Jun-24	292					0	-0.4	110	\$183,790	\$1,670	\$1,670	38.0%	130.5%	37.7%	142.7%
Jul-24	292					0	-0.3	110	\$190,601	\$1,737	\$1,737	38.0%	133.0%	37.6%	148.0%
Aug-24	292					0	-0.3	109	\$197,665	\$1,807	\$1,807	37.9%	135.6%	37.5%	153.5%
Sep-24	292					0	-0.3	109	\$204,991	\$1,880	\$1,880	37.8%	138.2%	37.3%	159.1%
Oct-24	292					0	-0.3	109	\$212,588	\$1,956	\$1,956	37.8%	140.9%	37.2%	165.0%
Nov-24	292					0	-0.3	108	\$220,466	\$2,035	\$2,035	37.7%	143.6%	37.1%	171.2%
Dec-24	292					0	-0.3	108	\$228,637	\$2,117	\$2,117	37.6%	146.5%	37.0%	177.5%
Total	3,504	0	\$0	0	0	0	-4.2	1,319	\$2,263,739	\$1,717		37.6%	146.5%		

9.7.2023 - August UML, HAP, and vouchers on the street data obtained from FO TTY, dated 9.7.2023.

Comments (Hover for VMS Comments)

Graphs

HOUSING AUTHORITY OF THE TOWN OF EAST GREENWICH PROCUREMENT POLICY

This Procurement Policy complies with the Annual Contributions Contract (ACC) between The East Greenwich Housing Authority (EGHA) and the HUD, Federal Regulations at 24 CFR 85.36, HUD Handbook 7460.8, Rev 2, and applicable State and Local laws.

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HOUSING AUTHORITY OF THE TOWN OF EAST GREENWICH RHODE ISLAND

PROCUREMENT POLICY

This Procurement Policy complies with the Annual Contributions Contract (ACC) between The East Greenwich Housing Authority (EGHA) and the HUD, Federal Regulations at 24 CFR 85.36, HUD Handbook 7460.8, Rev 2, and applicable State and Local laws.

GENERAL PROVISIONS

General

The EGHA shall: provide for a procurement system of quality and integrity; provide for the fair and equitable treatment of all persons or firms involved in purchasing by the EGHA; ensure that supplies and services (including construction) are procured efficiently, effectively, and at the most favorable prices available to the EGHA; promote competition in contracting; and assure that EGHA purchasing actions are in full compliance with applicable Federal standards, HUD regulations, State, and local laws.

Application

This Procurement Policy applies to all procurement actions of the Authority using Federal program grant funds for the operation, modernization and development of public housing. Nothing in this Policy shall prevent the EGHA from complying with the terms and conditions of any grant, contract, gift or bequest that is otherwise consistent with the law. When both HUD and non-Federal grant funds are used for a project, the work to be accomplished with the HUD funds should be separately identified prior to procurement so that appropriate requirements can be applied, if necessary. If it is not possible to separate the funds, HUD procurement regulations shall be applied to the total project. If funds and work can be separated and work can be completed by a new contract, then regulations applicable to the source of funding may be followed.

Definition

The term “procurement,” as used in this Policy, includes the procuring, purchasing, leasing, or renting of: (1) goods, supplies, equipment, and materials, (2) construction and maintenance; consultant services, (3) Architectural and Engineering (A/E) services, (4) Social Services, and (5) other services.

The term EGHA, as used in this Policy, refers to: the organization known as the Housing Authority of the Town of East Greenwich, and its Executive Director (or designee), who act with fiduciary duty to the organization as its Contracting Officer. Accordingly, the terms “EGHA”, “Executive Director” and “Contracting Officer” are used interchangeably in this Policy.

Exclusions

This policy does not govern administrative fees earned under the Section 8 voucher program, the award of vouchers under the Section 8 program, the execution of landlord Housing Assistance Payments contracts under that program, or non-program income, including fee-for-service revenue under 24 CFR Part 990, e.g. management fees, bookkeeping fees, asset management fees, etc. Such fee income is not considered Federal program income. These excluded areas are subject to applicable State and local requirements. Handbook No. 7460.8 REV 2

Changes in Laws and Regulations

If an applicable law or regulation is modified or eliminated, or a new law or regulation is adopted, the revised law or regulation shall, to the extent inconsistent with these Policies, automatically supersede these Policies.

Public Access to Procurement Information

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 accordance with the Rhode Island Access to Public Records Act (RI APRA).

ETHICS IN PUBLIC CONTRACTING

General

The EGHA hereby establishes this code of conduct regarding procurement issues and actions and shall implement a system of sanctions for violations. This code of conduct, etc., is consistent with applicable Federal, State, and/or local law.

Conflicts of Interest

No employee, officer, Board member, or agent of the EGHA shall participate directly or indirectly in the selection, award, or administration of any procurement if a conflict of interest, either real or apparent, would be involved. This type of conflict would be when one of the persons listed below has a financial or any other type of interest in a firm competing for the award, or would stand to gain a personal benefit from such a transaction:

- A. An employee, officer, Board member, or agent involved in making the award;
- B. 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);
- C. His/her partner; or
- D. An organization that employs or is negotiating to employ, or has an arrangement concerning prospective employment of any of the above.

Gratuities, Kickbacks, and Use of Confidential Information

No officer, employee, Board member, or agent of the EGHA shall ask for or accept gratuities, favors, or items of more than \$25.00 in value from any supplier, contractor, subcontractor, potential supplier, contractor or subcontractor; or any party related to any supplier, contractor, subcontractor, and shall not knowingly use confidential information for actual or anticipated personal gain in any procurement activity.

Prohibition Against Contingent Fees

Contractors wanting to do business with the EGHA must not hire a person to solicit or secure a contract for a commission, percentage, brokerage, or contingent fee, except for bona fide established commercial selling agencies.

Fraud Deterrence and Reporting.

Any EGHA employee, agent, and/or Board member is expected to adhere to all internal controls established by the EGHA in this Policy and the associated Procedures as they are integral in creating an environment of honesty and integrity, promoting the deterrence of fraud actions. If any employee, agent, Board member, resident, or other concerned party is witness to, or has knowledge of, any fraud action, they are strongly encouraged to contact executive management or EGHA legal counsel with this information. Every effort will be taken to ensure anonymity and the EGHA will be guided by the Whistleblower Protection Act of 1989 and the subsequent Whistleblower Protection Act of 2012 regarding the protections of those coming forward.

PROCUREMENT PLANNING

Planning is essential to managing the procurement function properly. Hence, the EGHA will periodically review its record of prior purchases, as well as future needs, to: find patterns of procurement actions that could be performed more efficiently or economically; maximize competition and competitive pricing among contracts and decrease the EGHA's procurement costs; reduce administrative costs; ensure that supplies and services are obtained without any need for re-procurement, e.g., resolving bid protests; and minimize errors that occur when there is inadequate lead time. Consideration should be given to storage, security, and handling requirements when planning the most appropriate purchasing actions.

PURCHASING METHODS

Petty Cash Purchases

Purchases under \$50 may be handled through the use of a petty cash account. Petty Cash Accounts may be established in an amount sufficient to cover small purchases made during a reasonable period, e.g., one month. For all Petty Cash Accounts, the EGHA shall ensure that security is maintained, and only authorized individuals have access to the account. These accounts should be reconciled and replenished periodically.

Credit (or Purchasing) Cards

Credit card usage should follow the rules for all other small purchases. For example, the contracting Officer may use a credit card for Micro Purchases without obtaining additional quotes provided the price is considered reasonable. However, for amounts above the Micro Purchase level, the Contracting Officer would generally need to have obtained a reasonable number of quotes before purchasing via a credit card. When using credit cards, the EGHA should adopt reasonable safeguards to assure that they are used only for intended purposes (for instance, limiting the types of purchases or the amount of purchases that are permitted with credit cards).

Small Purchase Procedures

For any amounts above the Petty Cash ceiling, but not exceeding \$150,000, the EGHA may use small purchase procedures. Under small purchase procedures, the EGHA shall obtain a reasonable number of quotes (preferably three); however, for purchases of less than \$5,000, also known as Micro Purchases, only one quote is required provided the quote is considered reasonable. To the greatest extent feasible, and to promote competition, small purchases should be distributed among qualified sources. Quotes may be obtained in writing, by fax, via email, or through e-procurement. The award shall be made to the qualified vendor who provides the best value to the EGHA. If award is to be made for reasons other than lowest price, documentation shall be provided in the contract file. The EGHA shall not break down requirements aggregating more than the small purchase threshold (or the Micro Purchase threshold) into several purchases that are less than the applicable threshold merely to: (1) permit use of the small purchase procedures or (2) avoid any requirements that applies to purchases that exceed the Micro Purchase threshold.

Sealed Bids

Sealed bidding (IFB) shall be used for all contracts that exceed the \$150,000.00 small purchase threshold and that are not competitive proposals or non-competitive proposals, as these terms are defined in this document. Under sealed bids, the PHA publicly solicits bids and awards a firm fixed-price contract (lump sum or unit price) to the responsive and responsible bidder whose bid, conforming with all the material terms and conditions of the IFB, is the lowest in price. Sealed bidding is the preferred method for procuring construction, supply, and non-complex service contracts that are expected to exceed \$150,000.

A. Conditions for Using Sealed Bids. EGHA shall use the sealed bid method if the following conditions are present: a complete, adequate, and realistic statement of work, specification, or purchase description is available; three or more responsible bidders are willing and able to compete effectively for the work; the contract can be awarded based on a firm fixed price; and the selection of the successful bidder can be made principally on the lowest price.

B. Solicitation and Receipt of Bids. An IFB is issued that includes the specifications, and all contractual terms and conditions applicable to the procurement, and a statement that award will be made to the lowest responsible and responsive bidder whose bid meets the requirements of the solicitation.

The IFB must state the time and place for both receiving the bids and the public bid opening. All bids received shall be date- and time-stamped and stored unopened in a secure place until the public bid opening. A bidder may withdraw the bid at any time prior to the bid opening.

C. Bid Opening and Award. Bids shall be opened publicly. All bids received shall be recorded on an abstract (tabulation) of bids, that shall then be made available for public inspection. If equal low bids are received from responsible bidders, selection shall be made by drawing lots or other similar random method. The method for doing this shall be stated in the IFB. If only one responsive bid is received from a responsible bidder, award shall not be made unless the price can be determined to be reasonable, based on a cost or price analysis.

D. Mistakes in Bids. Correction or withdrawal of bids may be permitted, where appropriate, before bid opening by written or emailed notice received in the office designated in the IFB prior to the time set for bid opening. After bid opening, corrections in bids may 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. All decisions to allow correction or withdrawal of a bid shall be supported by a written determination signed by the Contracting Officer. After bid opening, changes in bid prices or other provisions of bids prejudicial to the interest of the EGHA or fair competition shall not be permitted.

Competitive Proposals

Unlike sealed bidding, the competitive proposal method (RFP) permits: consideration of technical factors other than price; discussion with offerors concerning offers submitted; negotiation of contract price or estimated cost and other contract terms and conditions; revision of proposals before the final contractor selection; and the withdrawal of an offer at any time up until the point of award. Award is normally made based on the proposal that represents the best overall value to the PHA, considering price and other factors, e.g., technical expertise, past experience, quality of proposed staffing, etc., set forth in the solicitation and not solely the lowest price.

A. Conditions for Use. Where conditions are not appropriate for the use of sealed bidding, competitive proposals may be used. Competitive proposals are the preferred method for procuring professional services that will exceed the small purchase threshold. As detailed within Section 7.2.B. of the HUD Procurement Handbook 7460.8 REV 2, "Only under limited circumstances would construction services be procured by competitive proposal." Accordingly, construction services will most typically be procured using the sealed bid (IFB) or Small Purchases procedures (QSP).

B. Form of Solicitation. Other than A/E services, developer-related services and energy performance contracting, competitive proposals shall be solicited through the issuance of an RFP. The RFP shall clearly identify the importance and relative value of each of the evaluation factors as well as any subfactors and price. 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 until after award. The EGHA may assign price a specific weight in the evaluation criteria or the EGHA may consider price in conjunction with technical factors; in either case, the method for evaluating price shall be established in the RFP.

C. Evaluation. The proposals shall be evaluated only on the criteria stated in the RFP.

Where not apparent from the evaluation criteria, the EGHA shall establish an evaluation Plan for each RFP. Generally, all RFPs shall be evaluated by an appropriately appointed Evaluation Committee. The Evaluation Committee shall consist of the Executive Director, Finance Person, Department Rep (i.e., Maintenance, HCV/PH Coordinator), and depending on RFP, one or more Commissioner. Each Committee member will complete a Scoring Sheet for each submittal. The Evaluation Committee shall be required to disclose any potential conflicts of interest and to sign a non-disclosure statement. An Evaluation Report, summarizing the results of the evaluation, shall be prepared prior to the award of a contract.

D. Negotiations. Negotiations shall be conducted with all offerors who submit a proposal determined to have a reasonable chance of being selected for award, unless it is determined that negotiations are not needed with any of the offerors. This determination is based on the relative score of the proposals as they are evaluated and rated in accordance with the technical and price factors specified in the RFP. These offerors shall be treated fairly and equally with respect to any opportunity for negotiation and revision of their proposals. No offeror shall be given any 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.

A common deadline shall be established for receipt of proposal revisions based on negotiations. Negotiations are exchanges (in either competitive or sole source environment) between the PHA and offerors that are undertaken with the intent of allowing the offeror to revise its proposal. These negotiations may include bargaining. Bargaining includes persuasion, alteration of assumptions and positions, give-and-take, and may apply to price, schedule, technical requirements, type of contract or other terms of a proposed contract. When negotiations are conducted in a competitive acquisition, they take place after establishment of the competitive range and are called discussions.

Discussions are tailored to each offeror's proposal and shall be conducted by the contracting officer with each offeror within the competitive range. The primary object of discussions is to maximize the EGHA's ability to obtain best value, based on the requirements and the evaluation factors set forth in the solicitation. The contracting officer shall indicate to, or discuss with, each offeror still being considered for award, significant weaknesses, deficiencies, and other aspects of its proposal (such as cost, price, technical approach, past performance, and terms and conditions) that could, in the opinion of the contracting officer, be altered or explained to enhance materially the proposer's potential for award.

The scope and extent of discussions are a matter of the contracting officer's judgment. The contracting officer may inform an offeror that its price is considered by the PHA to be too high, or too low, and reveal the results of the analysis supporting that conclusion. It is also permissible to indicate to all offerors the cost or price that the EGHA's price analysis, market research, and other reviews have identified as reasonable." Auctioning" (revealing one offeror's price to get another offeror to lower their price) is prohibited.

E. Award. After evaluation of the revised proposals, if any, the contract shall be awarded to the responsible firm whose technical approach to the project, qualifications, price and/or any other factors considered, are most advantageous to the EGHA provided that the price is within the maximum total project budgeted amount established for the specific property or activity.

F. A/E Services. The EGHA must contract for A/E services using QBS procedures, using an RFQ. Sealed bidding shall not be used for A/E solicitations. Under QBS procedures, competitors' qualifications are evaluated, and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. Price is not used as a selection factor under this method. QBS procedures shall not be used to purchase other types of services, other than developer services and energy performance contracting, though architectural/engineering firms are potential sources.

Noncompetitive Proposals

A. Conditions for Use. Procurement by noncompetitive proposals (sole source) may be used only when the award of a contract is not feasible using small purchase procedures, sealed bids, cooperative purchasing, or competitive proposals, and if one of the following applies:

1. The item is available only from a single source, based on a good faith review of available sources: such a review should be documented and retained in the procurement file.
2. An emergency exists that seriously threatens the public health, welfare, or safety, or endangers property, or would otherwise cause serious injury to the EGHA, 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 of the other procurement methods, and the emergency procurement shall be limited to those supplies, services, or construction necessary simply 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.

B. Justification. Each procurement based on noncompetitive proposals shall be supported by a written justification for the selection of this method. The justification shall be approved in writing by the responsible Contracting Officer. Poor planning or lack of planning is not justification for emergency or sole-source procurements. The justification, to be included in the procurement file, should include the following information:

1. Description of the requirement;
2. History of prior purchases and their nature (competitive vs. noncompetitive);
3. The specific exception in 2 CFR 200.320(f)(1)-(4) which applies;
4. Statement as to the unique circumstances that require award by noncompetitive proposals;
5. Description of the efforts made to find competitive sources (advertisement in trade journals or local publications, phone calls to local suppliers, issuance of a written solicitation, etc.);
6. Statement as to efforts that will be taken in the future to promote competition for the requirement;

7. Signature by the Contracting Officer's supervisor (or someone above the level of the Contracting Officer); and
8. Price Reasonableness. The reasonableness of the price for all procurements based on noncompetitive proposals shall be determined by performing an analysis, as described in this Policy.

Cooperative Purchasing/Intergovernmental Agreements

The EGHA may enter into State and/or local cooperative or intergovernmental agreements to purchase or use common supplies, equipment, or services. The decision to use an interagency agreement instead of conducting a direct procurement shall be based on economy and efficiency. If used, the interagency 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 EGHA may use Federal or State excess and surplus property instead of purchasing new equipment and property if feasible and if it will result in a reduction of project costs. The goods and services obtained under a cooperative purchasing agreement must have been procured in accordance with 2 CFR 200.317 through 200.326.

Independent Cost Estimate (ICE)

For all purchases above the Micro Purchase threshold, the EGHA shall prepare an ICE prior to solicitation. The level of detail shall be commensurate with the cost and complexity of the item to be purchased.

COST AND PRICE ANALYSIS

The EGHA shall require assurance that, before entering into a contract, the price is reasonable, in accordance with the following instructions. HUD Procurement Handbook No. 7460.8 REV 20

FUNDING AVAILABILITY

For all purchases above the Micro Purchase threshold, authorized EGHA staff shall ensure the availability of funds to cover the anticipated cost of the procurement. Procuring person to Finance asking to confirm availability of funds from the source, and Finance's response affirming same.

AUTHORIZATION OF PAYMENT

No invoice shall be honored, nor partial payment made unless it is supported by an authorized Purchase Order, executed Contract, executed Change Order, and contains all pertinent back-up documentation. Payment of invoice is processed through the finance department, the provided to the Executive Director for review and signature, and monthly the Board Chair reviews all payments made.

COST AND PRICE ANALYSIS (CPA)

Before entering into a contract, EGHA shall require assurance that the price is reasonable, in accordance with the following instructions.

Petty Cash and Micro Purchases

No formal cost or price analysis is required. Rather, the execution of a contract by the Contracting Officer (through a Purchase Order or other means) shall serve as the Contracting Officer's determination that the price obtained is reasonable, which may be based on the Contracting Officer's prior experience or other factors.

Small Purchases

A comparison with other offers shall generally be sufficient determination of the reasonableness of price and no further analysis is required. If a reasonable number of quotes are not obtained to establish reasonableness through price competition, the Contracting Officer shall document price reasonableness through other means, such as prior purchases of this nature, catalog prices, the Contracting Officer's personal knowledge at the time of purchase, comparison to the ICE, or any other reasonable basis.

Sealed Bids

The presence of adequate competition should generally be sufficient to establish price reasonableness. When sufficient bids are not received, and when the bid(s) received is/are substantially more than the ICE, and where the EGHA cannot reasonably determine price reasonableness, the EGHA must conduct a cost analysis, consistent with federal guidelines, to ensure that the price paid is reasonable. the procurement file) needs to be commensurate with the procurement's dollar amount.

Competitive Proposals

The presence of adequate competition should generally be sufficient to establish price reasonableness. Where sufficient bids are not received, the EGHA must compare the price with the ICE. For competitive proposals where prices cannot be easily compared among offerors, where there is not adequate competition, or where the price is substantially greater than the ICE, the EGHA must conduct a cost analysis, consistent with Federal guidelines, to ensure that the price paid is reasonable the procurement file) needs to be commensurate with the procurement's dollar amount.

Contract Modifications

A cost analysis, consistent with federal guidelines, shall be conducted for all contract modifications for projects that were procured through Sealed Bids, Competitive Proposals, or Non-Competitive Proposals, or for projects originally procured through Small Purchase procedures and the amount of the contract modification (i.e.: Change Order / CO) will result in a total contract price more than \$150,000.

SOLICITATION AND ADVERTISING

Method of Solicitation

A. Petty Cash and Micro Purchases. The EGHA may contact only one source if the price is considered reasonable.

B. Small Purchases. Quotes may be solicited via email, in writing, through fax, or by any other reasonable method and will be confirmed in writing, including via email.

C. Sealed Bids and Competitive Proposals. Solicitation must be done publicly. The EGHA must use one or more of the following solicitation methods, provided that the method employed provides for meaningful competition.

1. Advertising in newspapers or other print mediums of local or general circulations, and websites EGHA posts all notices in the Providence Journal, The Pendulum (local publication), EG News (local online news source), and Nuevo Horizontes
2. Advertising in various trade journals or publications (for construction).
3. E-Procurement. The EGHA may conduct its public procurements through the Internet using e-procurement systems. However, all e-procurements must otherwise be in compliance with @ CFR 200.317 through 200.326, State and local requirements, and the Authority's Procurement Policy.

Time Frame

For purchases of more than \$150,000, the public notice should be published in local news media, at Agency, and on the EGHA's website. EGHA posts all notices in the Providence Journal, The Pendulum (local publication), EG News (local online news source), and Nuevo Horizontes. All publications will run for enough time to achieve competition.

Form

Notices/advertisements should state, at a minimum, the place, date, and time that the bids or proposals are due, the solicitation number, a contact who can provide a copy of, and information about, the solicitation, and a brief description of the needed items(s).

Time Period for Submission of Bids

A minimum of 30 days shall generally be provided for preparation and submission of sealed bids and 15 days for competitive proposals. However, the Executive Director may allow for a shorter period under extraordinary circumstances.

Cancellation of Solicitations

- A. An IFB, RFP, or other solicitation may be cancelled before bids/offers are due if:
1. The supplies, services or construction is no longer required;
 2. The funds are no longer available;
 3. Proposed amendments to the solicitation are of such magnitude that a new solicitation would be best; or
 4. Other similar reasons.

B. A solicitation may be cancelled and all bids or proposals that have already been received may be rejected if:

1. The supplies or services (including construction) are no longer required;
2. Ambiguous or otherwise inadequate specifications were part of the solicitation;
3. All factors of significance to the EGHA were not considered;
4. Prices exceed available funds and it would not be appropriate to adjust quantities to come within available funds;
5. There is reason to believe that bids or proposals may not have been independently determined in open competition, may have been collusive, or may have been submitted in bad faith; or
6. For good cause of a similar nature when it is in the best interest of the EGHA.

C. The reasons for cancellation shall be documented in the procurement file and the reasons for cancellation and/or rejection shall be provided upon request.

D. A notice of cancellation shall be sent to all bidders/offerors solicited and, if appropriate, shall explain that they will be given an opportunity to compete on any re-solicitation or future procurement of similar items.

E. If all otherwise acceptable bids received in response to an IFB are at unreasonable prices an analysis should be conducted to see if there is a problem with either the specifications or the EGHA's cost estimate. If both are determined adequate and if only one bid is received, and the price is unreasonable, the Contracting Officer may cancel the solicitation and either:

1. Re-solicit using an RFP; or
2. Complete the procurement by using the competitive proposal method. The Contracting Officer must determine, in writing, that such action is appropriate, must inform all bidders of the EGHA's intent to negotiate, and must give each bidder a reasonable opportunity to negotiate.

F. If problems are found with the specifications, EGHA should cancel the solicitation, revise the specifications and resolicit using an IFB.

BONDING REQUIREMENTS

The standards under this section apply to construction contracts that exceed \$150,000. There are no bonding requirements for small purchases or for competitive proposals. The EGHA may require bonds in these latter circumstances when deemed appropriate; however, non-construction contracts should generally not require bid bonds.

A. Bid Bonds. For construction contracts exceeding \$150,000, offerors shall be required to submit a bid guarantee from each bidder equivalent to 5% of the bid price.

B. Payment Bonds. For construction contracts exceeding \$150,000, the successful bidder shall furnish an assurance of completion. This assurance may be any one of the following four:

1. A performance and payment bond in a penal sum of 100% of the contract price;

- OR
2. Separate performance and payment bonds, each for 50% or more of the contract price; or
 3. A 20 % cash escrow; or
 4. A 25 % irrevocable letter of credit.

C. These bonds must be obtained from guarantee or surety companies acceptable to the U. S. Government and authorized to do business in the State of Rhode Island. Individual sureties shall not be considered. U. S. Treasury Circular Number 570 lists companies approved to act as sureties on bonds securing Government contracts, the maximum underwriting limits on each contract bonded, and the States in which the company is licensed to do business. Use of companies on this circular is mandatory.

CONTRACTOR QUALIFICATIONS AND DUTIES

Contractor Responsibility

The EGHA shall not award any contract until the prospective contractor, i.e., low responsive bidder, or successful offeror, has been determined to be responsible. A responsible bidder/offeror must:

- A. Have adequate financial resources to perform the contract, or the ability to obtain them;
- B. Be able to comply with the required or proposed delivery or performance schedule, taking into consideration all the bidder's/offeror's existing commercial and governmental business commitments;
- C. Have a satisfactory performance record;
- D. Have a satisfactory record of integrity and business ethics;
- E. Have the necessary organization, experience, accounting and operational controls, and technical skills, or the ability to obtain them;
- F. Have the necessary production, construction, and technical equipment and facilities, or the ability to obtain them; and,
- G. Be otherwise qualified and eligible to receive an award under applicable laws and regulations, including not be suspended, debarred or under a HUD-imposed LDP.

If a prospective contractor is found to be non-responsible, a written determination of non-responsibility shall be prepared and included in the official contract file, and the prospective contractor shall be advised of the reasons for the determination.

Suspension and Debarment

Contracts shall not be awarded to debarred, suspended, or ineligible contractors. Contractors may be suspended, debarred, or determined to be ineligible by HUD in accordance with HUD regulations (2 CFR 200.317 through 200.326) or by other Federal agencies, e.g., Dept of Labor for violation of labor regulations, when necessary to protect housing authorities in their business dealings.

Prior to issuance of a contract, EGHA staff shall, as detailed within Section 10.2.H.1 and 10.2.H.2 of the HUD Procurement Handbook 7460.8 REV 2, conduct the required searches within the HUD Limited Denial of Participation (LDP) system and the US GSA System for Award Management (SAM) and place within the applicable contract (procurement) file a printed copy of the results of each such search.

Vendor Lists

All interested businesses shall be given the opportunity to be included on vendor mailing lists. Any lists of persons, firms, or products that are used in the purchase of supplies and services (including construction) shall be kept current and include enough sources to ensure competition.

CONTRACT PRICING ARRANGEMENTS

Contract Types

Any type of contract that is appropriate to the procurement, that includes pricing and other key terms and deliverables, and that will promote the best interests of the EGHA may be used, provided the cost-plus-a-percentage-of-cost and percentage-of-construction-cost methods are not used. All solicitations and contracts shall include the clauses and provisions necessary to define the rights and responsibilities of both the contractor and EGHA, including required and suggested HUD provisions. For all cost reimbursement contracts, EGHA must include a written determination as to why no other contract type is suitable. Further, the contract must include a ceiling price that the contractor exceeds at its own risk.

Options

Options for additional quantities or performance periods may be included in contracts, provided that:

- A. The option is contained in the solicitation;
- B. The option is a unilateral right of the Authority;
- C. The contract states a limit on the additional quantities and the overall term of the Contract and does not exceed five (5) years;
- D. The options are evaluated as part of the initial competition;
- E. The contract states the period within which the options may be exercised;
- F. The options may be exercised only at the price specified in or reasonably

determinable from the contract; and

G. The options may be exercised only if determined to be more advantageous to EGHA than conducting a new procurement.

CONTRACT CLAUSES

All contracts shall identify the contract pricing arrangement as well as other pertinent terms and conditions, as determined by the EGHA.

Required Contract Clauses: The EGHA shall ensure that each contract it executes contains the required contract clauses detailed within 2 CFR 200.326 and Appendix II .

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 24 CFR 85.36 (i), such as the following:

1. Termination for convenience;
2. Termination for Cause
3. Termination for default;
4. Equal Employment Opportunity;
5. Davis-Bacon Act;
6. Contract Work Hours and Safety Standards Act, reporting requirements;

Additionally, the forms HUD-5369, 5369-A, 5369-B, 5369, 5370, 5370-C (Sections I and II), 51915, and 51915-A, which contain all HUD-required clauses and certifications for contracts of more than \$150,000, as well as any forms/clauses as required by HUD for small purchases, shall be used in all corresponding solicitations and contracts issued by this Authority.

CONTRACT ADMINISTRATION

The EGHA shall maintain a system of contract administration designed to ensure that contractors perform in accordance with their contracts. These systems shall provide for inspection of supplies, services, or construction, as well as monitoring contractor performance, status reporting on major projects including construction contracts, and similar matters. For cost-reimbursement contracts, costs are allowable only to the extent that they are consistent with the cost principles in HUD Handbook 2210.18.

SPECIFICATIONS

General

All specifications shall be drafted so as to promote overall economy for the purpose intended and to encourage competition in satisfying EGHA needs. Specifications shall be reviewed prior to issuing any solicitation to ensure that they are not unduly restrictive or represent unnecessary or duplicative items. Function 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.

Limitation

The following types of specifications shall be avoided:

A. Geographic restrictions not mandated or encouraged by applicable Federal law (except for A/E contracts, which may include geographic location as a selection factor if adequate competition is available);

B. Brand name specifications (unless the specifications 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 reviewed to ensure that organizational conflicts of interest do not occur.

APPEALS AND REMEDIES

General

It is EGHA policy to resolve all contractual issues informally and without litigation. Disputes will not be referred to HUD unless all administrative remedies have been exhausted. When appropriate, a mediator may be used to help resolve differences.

Informal Appeals Procedure

The EGHA shall adopt an informal bid protest/appeal procedure for contracts of \$150,000 or less. Under these procedures, the bidder/contractor may request to meet with the appropriate Contract Officer.

Formal Appeals Procedure

A formal appeals procedure shall be established for solicitations/contracts of more than \$150,000.

A. Bid Protest. 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 the receipt of bids or proposals, and any protest against the award of a contract must be received within ten (10) calendar days after the contractor receives notice of the contract award, or the protest will not be considered. All bid protests shall be in writing, submitted to the Contracting Officer or designee, who shall issue a written decision on the matter. The Contracting

Officer may, at his/her discretion, suspend the procurement pending resolution of the protest if the facts presented so warrant.

B. Contractor Claims. All claims by a contractor relating to performance of a contract shall be submitted in writing to the Contracting Officer for a written decision. The contractor may request a conference on the claim. The Contracting Officer's decision shall inform the contractor of its appeal rights to the next higher level of authority in the EGHA. Contractor claims shall be governed by the Changes clause in form HUD-5370.

ASSISTANCE TO SMALL AND OTHER BUSINESSES

Required Efforts

Consistent with Presidential Executive Orders 11625, 12138, and 12432, and Section 3 of the HUD Act of 1968, all feasible efforts shall be made to ensure that small and minority owned businesses, women's business enterprises, and other individuals or firms located in or owned in substantial part by persons residing in the area of the EGHA project are used when possible. Such efforts shall include, but shall not be limited to:

- 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. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by such firms;
- D. Establishing delivery schedules, where the requirement permits, that encourage participation by such firms;
- E. Using the services and assistance of the Small Business Administration, and the Minority Business Development Agency of the Department of Commerce;
- F. Including in contracts, to the greatest extent feasible, a clause requiring contractors to provide opportunities for training and employment for lower income residents of the project area and to award subcontracts for work in connection with the project to business concerns that provide opportunities to low-income residents, as described in 24 CFR Part 135 (so-called Section 3 businesses); and
- G. Requiring prime contractors, when subcontracting is anticipated, to take the positive steps listed above.

Goals shall be established periodically for participation by small businesses, minority owned businesses, women-owned business enterprises, labor surplus area businesses, and Section 3 business concerns in EGHA prime contracts and subcontracting opportunities.

Definitions

1. 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 Part 121 should be used to determine business size.
2. A minority-owned business is defined as a business that 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, Asian Indian Americans, and Hasidic Jewish Americans.
3. 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 control and operate the business.
4. A "Section 3 business concern" is as defined under 24 CFR Part 135.
5. A labor surplus area business is defined as a business which, together with its immediate subcontractors, will incur more than 50% of the cost of performing the contract in an area of concentrated unemployment or underemployment, as defined by the DOL in 20 CFR Part 654, Subpart A, and in the list of labor surplus areas published by the Employment and Training Administration.

BOARD APPROVAL OF PROCUREMENT ACTIONS

Other than approval of this Procurement Policy as well as Procurement of purchases and/or contracts of \$150,000 or higher, approval by the Board of Commissioners is not required for any procurement action, as permitted under State and local law. Rather, it is the responsibility of the Executive Director to make sure that all procurement actions are conducted in accordance with the policies contained herein and keep the Board of Commissioners apprised of all Procurement activity.

DELEGATION OF CONTRACTING AUTHORITY

While the Executive Director is responsible for ensuring that the EGHA's procurements comply with this Policy, the Executive Director may delegate all procurement authority as is necessary and appropriate to conduct the business of the Agency.

Further, and in accordance with this delegation of authority, the Executive Director shall, where necessary, establish operational procedures (such as a procurement manual or standard operating procedures) needed to implement this policy. The Executive Director shall also establish a system of sanctions for violations of the ethical standards described in Section III below, consistent with Federal, State, or local law.

DOCUMENTATION

The EGHA must maintain records sufficient to detail the significant history of each procurement action. These records shall include, but shall not necessarily be limited to,

the following:

- A. Rationale for the method of procurement (if not self-evident);
- B. Rationale of contract pricing arrangement (also if not self-evident);
- C. Reason(s) for accepting or rejecting the bids or offers;
- D. Basis for the contract price (as prescribed in this handbook);
- E. A copy of the contract documents awarded or issued and signed by the Contracting Officer;
- F. Basis for contract modifications; and
- G. Related contract administration actions.

The level of documentation should be commensurate with the value of the procurement.

Records are to be retained for a period of three (3) years after final payment and all matters pertaining to the contact are closed.

DISPOSITION OF SURPLUS PROPERTY

Property no longer necessary for the EGHA's purposes (non-real property) shall be transferred, sold, or disposed of in accordance with applicable Federal, state, and local laws and regulations.

FUNDING AVAILABILITY

Before initiating any contract, the EGHA shall ensure that there are sufficient funds available to cover the anticipated cost of the contract or modification.

SELF-CERTIFICATION

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

East Greenwich Housing Authority

Memorandum

To: EGHA Board of Commissioners
From: Tracy Johnson, Executive Director
Date: November 13, 2023
RE: Buyback of Staff PTO

Annually, the Board reviews and discusses the possibility of “buying back” of up to 10 days of the staff’s accrued time off.

Staff MUST keep 5 days of sick time on record and cannot use up all their time. All staff accrue 7 sick days annually on their anniversary date and can carry over up to 30 days. Any days over the 30 days are forfeited; in addition, all staff accrue 3 personal days on their anniversary. Any unused personal days are forfeited. Vacation time varies depending on the number of years employed. The maximum number of days employees, who have been here 15+ years, can get is 20. (capped at 25).

In previous years, there were several staff members who have been with EGHA long enough to accrue the maximum number of days allotted. We are now down to 2.

I ask that the Board approve this request this year.

Respectfully,
Tracy



New England

U.S. Department of Housing and Urban Development

Office of Public Housing
Boston Hub
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street
Boston, Massachusetts 02222-1092

October 23, 2023

Tracy Johnson
Executive Director
East Greenwich Housing Authority
146 First Ave.
East Greenwich, RI 02818

VIA ELECTRONIC MAIL ONLY

Dear Ms. Johnson:

**SUBJECT: Section 8 Management Assessment Program (SEMAP)
Fiscal Year Ending (FYE) June 30, 2023**

The purpose of this letter is to inform you of East Greenwich Housing Authority's (EGHA) overall SEMAP score, overall performance rating (designation), and the rating on each SEMAP indicator.

SEMAP enables HUD to better manage the Section 8 tenant-based program by identifying public housing agency (PHA) capabilities and deficiencies related to the administration of the Section 8 Program. As a result, HUD will be able to provide more effective program assistance to PHAs.

The EGHA's overall SEMAP score for the fiscal year ending 06/30/2023 is **93%**. Attached please find your rating on each indicator. The overall SEMAP score is derived by dividing the sum of the indicator ratings by the total possible points. The SEMAP scores are rounded off to the nearest possible whole number. As a result of your overall SEMAP score of **93%**, the PHA is hereby designated as a **High Performer**. Congratulations on your excellent performance.

The EGHA currently has 44 Family Self-Sufficiency Mandatory Slots. Please contact your assigned Portfolio Management Specialist should your records differ. Please refer to PIH Notice 97-45 for guidance on qualifications for requesting an exception to this requirement.

If you have any questions regarding your SEMAP rating, please contact Portfolio Management Specialist, at (617) 994-8423 or by e-mail at Terri.A.Green@hud.gov.

Very sincerely yours,

A handwritten signature in black ink that reads "Tai M. Pope". The signature is written in a cursive, slightly slanted style.

Tai M. Pope
Division Director

Attachment

SEMAP Individual Indicator Score for FYE 06/30/2023



HQ Division : Public and Indian Housing
HQ Office : PO Field Operations
Hub : 1HBOS Boston Hub
Field Office : 1GPH PROVIDENCE COMMUNITY SERVICE CENTER
Field Office HA : RI024 East Greenwich Housing Authority

#	Indicator	Points Achieved	Maximum Points	% Achieved
1	Selection from Waiting List (24 CFR 982.54(d)(1) and 982.204(a))	15	15	100.00%
2	Reasonable Rent (24 CFR 982.4, 982.54(d)(15), 982.158(f)(7) and 982.507)	15	20	75.00%
3	Determination of Adjusted Income (24 CFR part 5, subpart F and 24 CFR 982.516)	20	20	100.00%
4	Utility Allowance Schedule (24 CFR 982.517)	5	5	100.00%
5	HQS Quality Control (24 CFR 982.405(b))	5	5	100.00%
6	HQS Enforcement (24 CFR 982.404)	10	10	100.00%
7	Expanding Housing Opportunities.	5	5	100.00%
8	Payment Standards(24 CFR 982.503)	5	5	100.00%
9	Timely Annual Reexaminations(24 CFR 5.617)	10	10	100.00%
10	Correct Tenant Rent Calculations(24 CFR 982, Subpart K)	5	5	100.00%
11	Pre-Contract HQS Inspections(24 CFR 982.305)	5	5	100.00%
12	Continuing HQS Inspections(24 CFR 982.405(a))	10	10	100.00%
13	Lease-Up	20	20	100.00%
14	Family Self-Sufficiency (24 CFR 984.105 and 984.305)	5	10	50.00%
15	Deconcentration Bonus	0	5	0.00%



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
Multifamily Northeast Region
Boston Satellite Office
Thomas P. O'Neill, Jr. Federal Building
10 Causeway Street, 3rd Floor
Boston, MA 02222-1092

September 29, 2023

SUBJECT: Property: [REDACTED]
Project Number: [REDACTED]
Tenant inquiry to smoke hemp

Dear [REDACTED]

I am responding to your inquiry on smoking hemp on HUD subsidized properties regarding the 2018 Farm Bill. All HUD properties are bound to the guidance of the HUD Handbook 4350.3. There have been no revisions to the HUD Handbook 4350.3 regarding smoking hemp or marijuana in/on Federally assisted properties, therefore smoking hemp and marijuana are not allowed.

If you have any questions, please contact Nida Veitas-Purins at nida.s.veitas-purins@hud.gov.

Sincerely,

A handwritten signature in black ink that reads "Carl Nichols Jr.".

Carl Nichols Jr.
Branch Chief, Asset Management
Multifamily Northeast Division

The Multifamily Northeast Region consists of the New York Regional Center and the Baltimore and Boston Satellite Offices. Together, they serve Connecticut, Delaware, the District of Columbia, Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York, Pennsylvania, Rhode Island, Vermont, Virginia, and West Virginia.

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