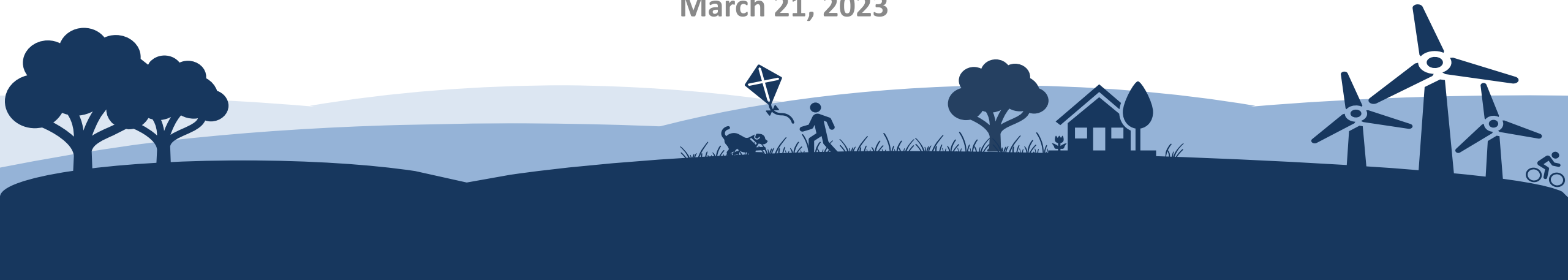




# State CDBG Procurement Requirements for Staff Augmentation Lilah Haxton, CPD Specialist

State and Small Cities Division, Office of Block Grant Assistance, HUD

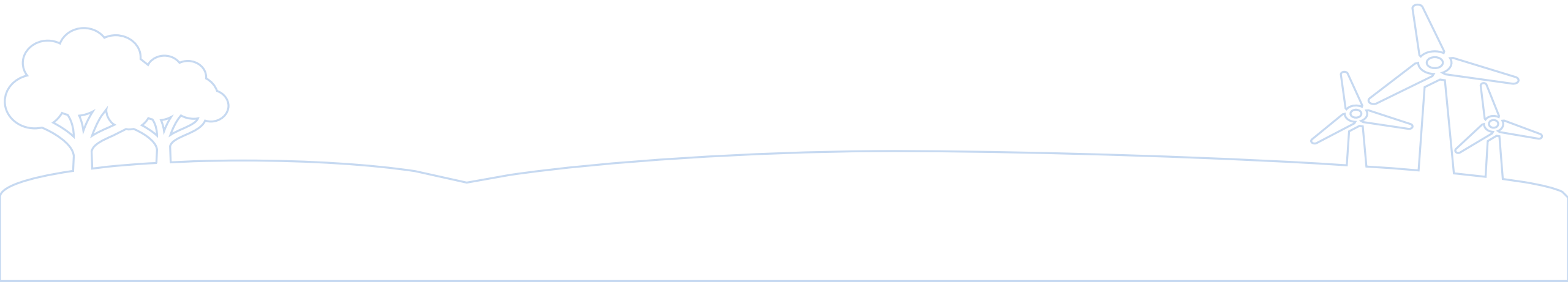
March 21, 2023



Augmenting staff with consultants

Grants Manager

HELP WANTED



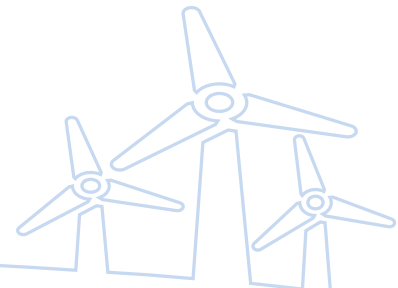
# Administrative and Technical Assistance

## Eligibility

- Staff time and/or contracted services to manage the funds and CDBG program overall
- Staff time and/or contracted services to provide technical assistance

## Don't forget program requirements

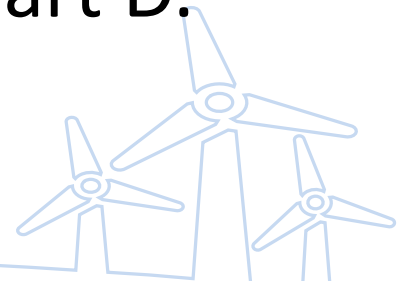
- Funding caps
- State contribution requirements
- Procurement requirements, policies, and procedures
- Inherently Governmental Functions



# Procurement Requirements

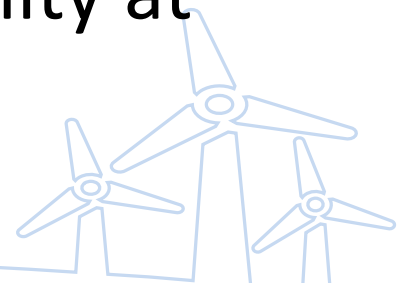
State CDBG Regulations: 24 CFR 570.489(g)

- States have flexibility to adopt their own procurement policy and procedures; or
- States may adopt 2 CFR Subpart D, Sections 200.317-200.327, Procurement Standards; or
- States may adopt a modified version of 2 CFR 200 Subpart D.



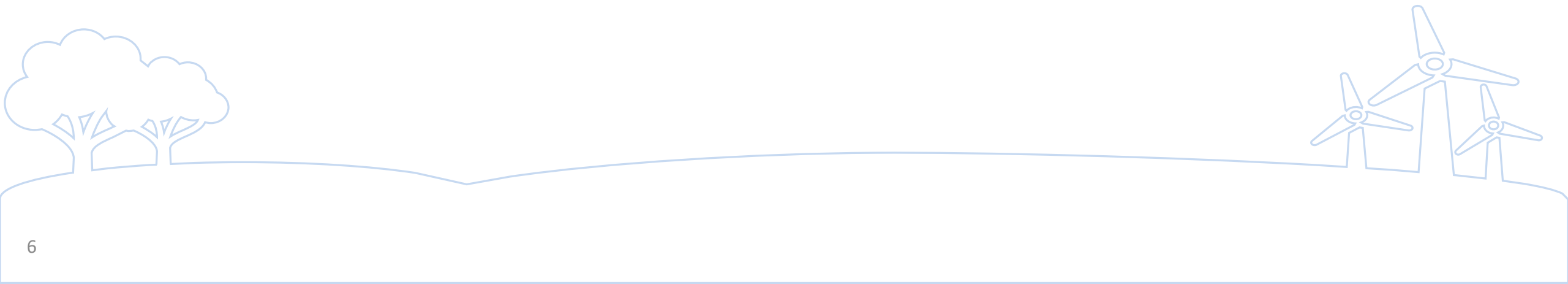
# “Essence of good procurement”

- Cost Principles requirements for Professional Services at 2 CFR 200.459
- Assess and identify services that you want to obtain;
- Use the correct method of procurement such as small purchase, competitive proposals, and non-competitive;
- Seek competitive offers to obtain the best possible quality at the best possible price;



# “Essence of good procurement” continued

- Use a written agreement stating the responsibilities of each party;
- Keep good records; and
- Have a quality assurance system that helps you get what you pay for.



# Evaluating and Selecting a Consultant

Criteria may include the consultant's

- overall experience and resources to support project
- understanding of the state's intended outcome or deliverables
- relevance of education and experience of personnel
- usefulness of the proposed methods to support your program
- appropriateness of the proposed project management practices
- familiarity with the CDBG program and your state
- demonstration that they can successfully complete the contract

# Administering Contracts

- Contract agreement
  - Include the scope of work / workplan
  - Schedule of activities
  - Personnel assignments
  - Payment procedures
  - Define roles and responsibilities of contractor and state including how to address concerns
- Kick-off meeting
- Progress meetings





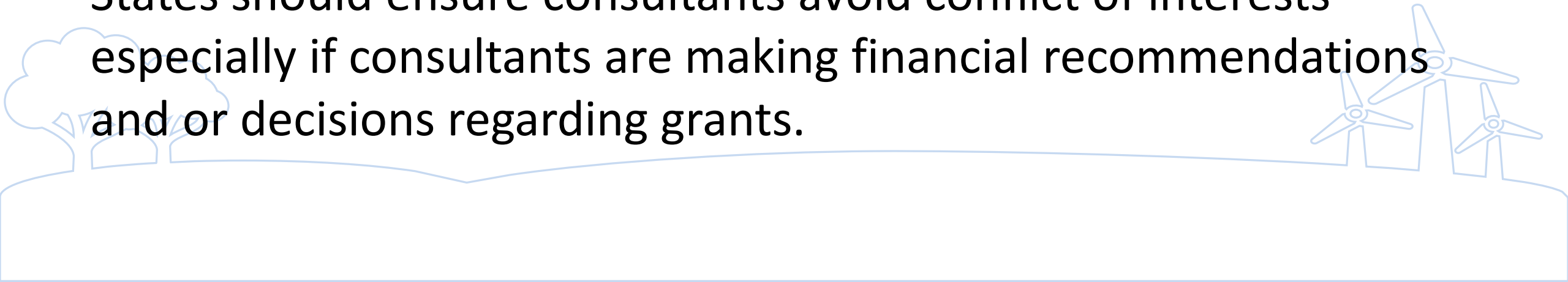
# Conflict of Interest

## **Procurement 44 CFR 570.489(g)**

Procurement policies and procedures should include standards of conduct governing employees engaged in the award or administration of contracts.

## **Other Conflicts of Interest 44 CFR 570.489(h)**

States should ensure consultants avoid conflict of interests especially if consultants are making financial recommendations and or decisions regarding grants.

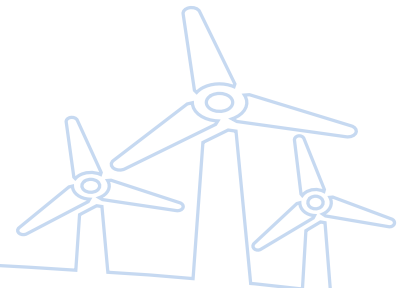
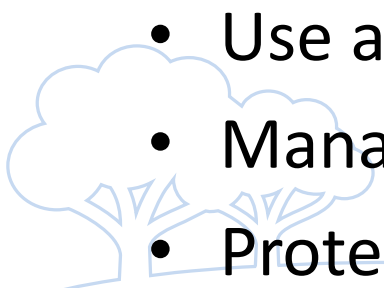


# Summary

States can hire consultants to support grants management and technical assistance activities and activities you carry out directly

## Key takeaways

- Clearly describe your needs for the consultant
- Follow state's prescribed procurement policies and procedures
- Maintain and review records to show compliance
- Use appropriate clauses in the agreement
- Manage the progress of the contract
- Protect Inherently Governmental Functions



**THANK YOU**

