



Procurement Policy

Leech Lake Band of Ojibwe Housing Authority

Guidelines to be followed for Procurement and Purchasing activities of the Leech Lake
Housing Authority

10/8/2021

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I. Introduction

100.1 Purpose. It is the policy of the Leech Lake Band of Ojibwe Housing Authority that this Procurement Policy shall represent the principals and standards for conducting procurement and purchasing. It will provide for the fair and equitable treatment of all persons or firms involved in purchasing by the Leech Lake Housing Authority (LLHA); to assure that supplies, services and construction are procured efficiently, effectively, and at the most favorable prices available to LLHA; to promote competition in contracting; to provide safeguards for maintaining a procurement system of quality and integrity; and assure the LLHA purchasing actions are in full compliance with applicable federal, state, local and Tribal laws.

100.2 Authority. The Leech Lake Band of Ojibwe Housing Authority is recognized as a Tribally Designated Housing Entity (TDHE) authorized to conduct business by the self-governing tribe of the Leech Lake Band of Ojibwe (LLBO). The Leech Lake Band of Ojibwe participates in tribal self-governance as authorized under Public Law 93-638, as amended (25 U.S.C. 450 et seq.). The LLBO Ordinance 79-9 established the Leech Lake Housing Authority as the TDHE to remedy unsafe and unsanitary housing conditions that are injurious to the public health and safety and to alleviate the shortage of safe and decent housing for persons of low income. Further, this Procurement policy shall be issued under the authority of Native American Housing Assistance and Self Determination Act of 2008 – Final Rule and specifically 2 CFR Part 200, {Appendix A} 24CFR Part 1000, {Appendix B} and Section 7(b) of the Indian Self Determination and Education Assistance Act (25 U.S.C 450e(b) {Appendix C}.

100.3 Application. This procurement policy shall apply to all contracts in the procurement of supplies, services and construction entered into by LLHA after the effective date of this policy. It shall also apply to every other expenditure of funds by LLHA for public purchasing, irrespective of the source of funds, including contracts which do not involve an obligation of funds; however, nothing in this statement shall prevent the Leech Lake Housing Authority from complying with the terms and conditions of any grant, contract, gift or bequest that is otherwise consistent with law. When both NAHASDA and non-federal funds are used for a project, the work to be accomplished with NAHASDA funds shall be separated and Indian Preference must be applied to the portion of the project funded by NAHASDA. If the work cannot be separated then Indian Preference will apply to the entire project.

100.4 Definitions.

Bid Guarantee - An assurance that a bidder will, upon acceptance of the bid, execute such contractual documents as may be required within a specified period of time.

Conflict of Interest – A set of circumstances that creates risk that professional judgement or actions regarding a primary interest will be unduly influenced by a secondary interest such as a financial gain professional advancement or a wish to do favors for family and friends.

Indian-owned Economic Enterprise – Indian-owned commercial, industrial, or business activity established or organized for the purpose of profit, except that the Indian ownership must constitute not less than 51 percent of the enterprise. (Federal Register Vol. 77, No.232 24 CFR.1000.48)

Indian-owned organization – the governing body of any Indian tribe or entity established or recognized by such governing body (Federal Register Vol. 77, No 232. 24 CFR 1000.48).

Payment Bond As assurance executive in connection with a contract to secure payment as required by law to all persons supplying labor and material in the execution of the work provided for in the contract.

Performance Bond An assurance executed in connection with a contract to secure fulfillment of all the contractor's obligations under the contract.

Procurement – The term procurement, as used in this policy, describe the activities which include both contracts and modifications (including change orders) for construction or services, as well as the purchase or lease of supplies and equipment.

RFP – The acronym RFP stands for Request for Proposal

RFS – The acronym RFS stand for Request for Services

II. Procurement Administration

200.1 Authorized Personnel. All procurement transactions shall be administrated by authorized personnel with the utilization of methods that are consistent with federal, state, local and Tribal laws. The Executive Director shall ensure

that the standards of this policy are followed and that any violation of ethical standards as regards procurement are addressed with the guidelines set forth in the Leech Lake Housing Authority Conflict of Interest policy (10/27/2015) and the Leech Lake Housing Authority Personnel Policies and Procedures (8/4/15).

200.2 Policy Standards. The following rules and regulations shall be utilized as a guide for procurement and purchasing standards: 2 CFR Part 200[Office of Management and Budget Super Circular] {Appendix A}, 24 CFR Part 1000, {Appendix B} Section 7(b) of the Indian Self-Determination and Education Assistance Act (25 U.S.C. 450e(b)) {Appendix C}, and the LLHA Conflict of Interest Policy (adopted Oct 2015).

Procurement standards will be that:

- Procurement requirements are subject to an annual planning process to assure efficient and economical purchasing and to avoid duplicative or unnecessary purchases;
- There are sufficient unencumbered funds available to cover the anticipated cost of each procurement before contract award or modification (including change orders), work is inspected before payment, and payment is made promptly for contract work performed and accepted, as provided in the contract language;
- All procurement transactions will be conducted in a manner providing full and open competition. Contractors that develop or draft specifications, requirements, statements of work, or requests for proposal or services shall be excluded from competing for such procurements;
- No unreasonable requirements will be placed upon bidders to qualify them to do business such as requiring unnecessary experience or excessive bonding;
- When procuring for supplies, specifying only "brand name" products is not allowed. "An equal" product offered must be considered if the specifications of the product are equal to or greater than the specified product;
- Consultants who may be on retainer with the LLHA will be required to compete for specific new contract opportunities;

- Organizational conflicts of interest are to be avoided and the Leech Lake Housing Authority's Conflict of Interest policy will apply to all procurement activities. Violations of the Conflict-of-Interest guidelines will result in disciplinary action up to and including termination of employment;
- No arbitrary action in the procurement process will be allowed;
- Procedures for inventory control, shortage and protection of goods and supplies, and issuance of, or other disposition of, supplies and equipment are established with General Accepted Accounting Principles (GAAP) as outlined in the LLHA Finance Policy and Procedures;

200.3 Solicitation List. LLHA will maintain a list qualified business enterprises that will be referred to as potential sources when undergoing procurement. This list will identify Indian-owned and other minority businesses and women's business enterprises. LLHA will ensure that these firms are solicited whenever they are potential sources.

200.4 Affirmative Action. LLHA will take steps to encourage the participation of minority businesses and women's business enterprises in the bidding process by dividing total solicitation requirements, when economically feasible, into smaller tasks or quantities ; establishing delivery schedules that are manageable for these firms; using the services and assistance, as appropriate, of such organizations as the Small Business Administration or the Minority Business Development Agency and finally, by requiring prime contractors to take these affirmative action steps whenever subcontracting. However, Indian preference will take precedence over other "minority" businesses.

200.5 Indian Preference. The LLHA shall to the greatest extent feasible provide preference to responsive and responsible Indian-owned economic enterprises and organizations and shall, to the extent feasible, maintain and / or refer to a list of qualified Indian-owned supply sources.

The LLHA shall allow Indian-owned economic enterprises and organizations a 10% latitude in determining the lowest bidder on contracts under \$150,000; a 7.5% latitude in determining the lowest bidder on contracts between \$150,000 and \$300,000 and a 5% latitude in determining the lowest bidder on contracts over \$300,000.

The LLHA shall require a statement from all contractors agreeing to provide Indian preference in subcontracting, training and employment, and shall specify the method to be used. LLHA shall maintain a list of Indian-owned economic enterprises and organizations by trade that it will provide to prime contractors to aid in the contractor's compliance with Indian preference. The local TERO office may also be solicited for such a list of eligible subcontractors.

The LLHA shall document the efforts in providing Indian preference. If no quotations are solicited or received from Indian-owned businesses or Indian organizations, LLHA shall document the procurement file with the reason for the lack of Indian participation.

200.6 Climate-Friendly Purchasing. LLHA commits to the responsible purchasing of climate-friendly products and services which will aid in the effort to reduce greenhouse gas emissions, combat climate change and promote sustainability. This commitment includes purchasing products that are durable, contain recycled content and promote waste reduction and reuse whenever possible.

- Electronics and appliances shall meet Energy-Star efficiency standards.
- Paper products shall contain post-consumer recycled content.
- Lighting fixtures shall require LED, Compact Fluorescent or T-8 Fluorescent bulbs.
- Water conserving fixtures shall be utilized. Toilets, showerheads and bathroom faucets shall be Water-Sense labeled or not to exceed:
 - Toilets – 1.28 gpf
 - Showerheads – 2.0 gpm
 - Bathroom faucets – 1.5 gpm
 - Kitchen faucets – 2 gpm

200.7 Ineligible Contractors. Contracts shall not be awarded to contractors who have been disbarred, suspended or determined ineligible by HUD. LLHA may suspend or debar a contractor under state, local or tribal law as applicable.

200.8 Board of Commissioner's Role. The Board of Commissioner's role in procurement shall be guided by the LLHA Conflict of Interest Policy, the LLHA Finance Policy and Procedures and this policy. This edition of the Procurement policy and any later changes shall be submitted to the LLHA Board of Commissioners for approval and adoption. The Board appoints and delegates procurement activity to the Executive Director and is responsible for ensuring that any procurement policies adopted are appropriate for the LLHA.

III. Procurement Methods

300.1 Selection of Method. When satisfying its needs by procurement, the LLHA shall choose one of the following methods: Micro-Purchase, Small Purchase, Sealed Bids, Competitive Proposals, and Non-Competitive Proposals. The selection of method will be based on the nature and anticipated dollar value of the total requirement.

300.2 HUD Review. LLHA will make the following available for HUD review:

- Technical specifications on proposed procurements, upon request;
- Any pre-procurement documents, upon request;
- Any procurement that exceeds the Small Purchase threshold that is to be awarded without competition or where only one bid or offer is received in response to a solicitation;
- Any procurement exceeding the Small Purchase threshold that specifies a "Brand Name" product.
- Any procurement exceeding the Small Purchase threshold and is to be awarded to other than the apparent low bidder under a sealed procurement;
- Any proposed contract modification that changes the scope of the contract or that increases the contract amount by more than the Small Purchase threshold

IV. Micro-Purchase (De Minimis) Method

400.1 General. Procurement by micro-purchase is the acquisition of supplies or services, the total dollar amount of which does not exceed \$5,000 (or \$2,000 in the case of acquisitions for construction subject to the Davis-Bacon Act). To the extent possible, LLHA will distribute micro-purchases equitably among qualified suppliers.

400.2 Obtaining Quotes. The LLHA shall solicit price quotations by phone, email or other informal procedure that allows participation by a reasonable number of competitive sources. Oral quotations are acceptable (provided LLHA documents the quotes received). All sources must be given identical specifications.

400.3 Re-occurring Micro Purchases. If the LLHA has reoccurring or scheduled micro purchases for materials and or supplies and the total dollar for those purchases over the course of the year exceed \$5,000 then the LLHA shall, when reasonable, buy in bulk and follow the procedures for a small purchase.

400.4 LLHA Finance Policy. Leech Lake Housing Authority's Finance policy and procedures will apply once a supplier has been selected.

V. Small Purchase Method

500.1 General. Any procurement not exceeding \$150,000 may be conducted in accordance with the small purchase procedures authorized in this section. Contract

requirements shall not be artificially divided into phases so as to constitute a small purchase under this section.

500.2 Procedures. At its option, the LLHA may elect to use small purchase procedures on purchases totaling less than \$150,000.

500.3 Obtaining Quotes. The LLHA shall solicit price quotations by phone, email or other informal procedure that allows participation by a reasonable number of competitive sources. When soliciting quotations, the LLHA shall inform the sources solicited of the specific item being procured and the time by which quotations shall be submitted. All sources must be given identical specifications. The specifications must be approved by either the Contracting Officer or the Maintenance Department Supervisor depending on which type of work or product is being solicited. The quotations shall be submitted in writing; however, the written quotation may be a confirmation of a previous oral quotation only if submitted within 10 days of the oral quotation or by the due date for submitting quotations. The names, addresses and / or email addresses, phone numbers, the names of persons contacted and the date and amount of each quotation shall be recorded on the LLHA Procurement Form {Appendix D} and maintained as a public record.

500.4 Competition. The LLHA shall attempt to obtain quotations from a minimum of three qualified sources and document the procurement file with a justification whenever it has not been able to obtain at least three quotations. Solicitation of fewer than three sources is acceptable if the LLHA has attempted but has been unable to obtain a sufficient number of quotations. The sole quotation received may be accepted only if a minimum of ten (10) calendar days has been passed in which quotes were solicited or in unusual circumstances such as an emergency threat to public health and safety.

500.5 Award. Award shall be based on price, ability to perform and fixed specifications- taking Indian preference into account. The LLHA shall make award to the qualified Indian-owned business or organization with the lowest responsive quotation if it is reasonable and no more than 10% higher than the lowest responsive quotation received. If no responsive quotation from a qualified Indian-owned business or organization is received, then the award shall be made to the responsible source with the lowest quotation.

500.6 LLHA Finance Policy. Once the successful bidder has been identified, Leech Lake Housing Authority's Finance Policy will apply as regards purchasing procedures and contract approval limits.

VI. Sealed Bid Method

600.1 General. LLHA shall use the method of sealed bidding in accordance with federal regulations [24 CFR 1000 and 2 CFR Part 200]. Sealed bidding is accomplished by means of formal advertising and is the preferred method for construction procurement. For professional services contracts, such as architectural and engineering, sealed bidding will not be used.

600.2 Conditions for Use. Contracts shall be awarded on competitive sealed bidding if the following conditions are present: a complete, adequate, and realistic specification or purchase description is available; two or more responsible bidders are willing and able to compete effectively for the work; the procurement lends itself to a firm fixed price contract; and the selection of the successful bidder can be made principally on the basis of price. Sealed bidding is the preferred method for construction procurement. For professional services, sealed bidding should not be used.

600.3 Solicitation of Bids. An invitation for bids shall be issued including specifications and all contractual terms and conditions applicable to the procurement. The specifications must be approved by either the Contracting Officer or the Maintenance Department Supervisor depending on which type of work or product is being solicited. All invitations shall state the time and place for both the receipt of bids and the public bid opening. A minimum of two weeks will be allowed for bidders to respond to the invitation. A statement that the bids must be honored for a period of 30 days in the case of a major construction project shall be included in the terms and conditions of the procurement.

600.4 Restricting Solicitations. The invitation may be restricted to qualified Indian-owned economic enterprises and organizations if there is a reasonable expectation of receiving the required minimum number of bids from them (see below). Otherwise, the LLHA shall solicit bids from non-Indian as well as Indian-owned economic enterprises and organizations if: the LLHA decides not to restrict the solicitation or a single bid is not accepted. All unrestricted solicitations will state that *"Indian Preference Will Apply-conditions of preference are available upon request"*.

600.5 Amendments. Any amendments to the invitation shall be in writing, and if it is necessary to issue an amendment within seven days of the bid opening, the bid opening shall be postponed until at least seven days from the date that the amendment was issued.

600.6 Receiving Bids. All bids received shall be time-stamped but not opened and shall be stored in a secure place until bid opening.

600.7 Bid Withdrawal. A bidder may withdraw its bid at any time prior to bid opening. The request for withdrawal will be in writing or verbally if documented by LLHA with the time, date and the name of the person making the request for withdrawal.

600.8 Bid Opening. Bids shall be opened publicly and in the presence of at least one witness. The bidders may be present at the opening. The bids shall be recorded and the bids shall be available for public inspection.

600.9 Bid Errors. Corrections of erroneous bids may be permitted, where appropriate, before bid opening by written or verbal notice if received in the office designated in the invitation for bids prior to the time set for bid opening. After bid opening, corrections in bid shall be permitted only if the bidder can show by clear and convincing evidence that a mistake of a non-judgmental character was made, the nature of the mistake and the bid price actually intended. A low bidder alleging a non-judgmental mistake may be permitted to withdraw its bid if the mistake is clearly evident on the face of the bid document.

600.10 Bid Protests. Any actual or prospective contractor may protest the solicitation or award of a contract for serious violations of the principles of this statement. Any protests against a solicitation must be received before the due date for receipt of bids or proposals, and any protest against the award of a contract must be received within 10 calendar days after the contract award or the protest will not be considered. All protests must be in writing and submitted to the Executive Director who shall issue a written decision on the matter. The Executive Director may at his/her discretion suspend the procurement pending resolution of the protest.

600.11 Award. Award shall be made as provided in the invitation for bids by written notice to the lowest responsive and responsible bidder who is able to perform the work described in the invitation. Where specified in bidding documents factors such as discounts, transportation cost and life cycle cost will be considered in determining which bid is lowest. Award will also be determined based on the type of solicitation as follows:

- 1) **Restricted solicitation:** If the solicitation is restricted to Indian-owned economic enterprises or organizations, and two or more qualified bidders submit responsive bids, award shall be made to the responsible bidder with the lowest bid. If equal low bids are received, award shall be made by a random selection method.
- 2) **Unrestricted solicitation –** If the solicitation is not restricted to Indian owned economic enterprises or organizations, award shall be made to the lowest responsive and responsible bidder still taking Indian preference into

consideration. If equal low bids are received, award shall be made by a random selection method.

3) Unsuccessful firms will be notified within 10 days after contract award;

600.12 LLHA Finance Policy. Leech Lake Housing Authority's Finance policy and procedures will apply once a contractor has been selected as regards contract approval limits.

VII. Competitive Proposals

700.1 General. LLHA shall use the method of competitive proposal bidding in accordance with federal regulations [24 CFR 1000 and 2 CFR Part 200]. Competitive proposals are the preferred method of procurement for qualification-based procurement such as professional services contracts like architectural / engineering.

700.2 Conditions for Use. Competitive proposals may be used if there is an adequate method of evaluating technical proposals which is established before the solicitation is issued. An adequate number of qualified responding sources shall be at least two proposals.

700.3 Solicitation for RFP. The RFP may use a restricted solicitation if it is reasonable to expect to receive more than two responses from Indian-owned economic enterprises or organizations. Otherwise, the unrestricted solicitation method shall be used. Unrestricted solicitations will state that *"Indian Preference Will Apply-conditions of preference are available upon request"*. The solicitation shall contain the mechanism with will be used evaluate the proposals. Proposals shall be handled in a manner as to prevent disclosure of the number and identity of the bidders and the content of their proposals.

700.4 Evaluation Factors. The RFP shall clearly identify the relative importance of price and other evaluation factors and sub-factors including the weight given to each. LLHA will give 15% of the total number of available rating points in unrestricted solicitations in consideration of Indian preference and 5% for non-Indian owned economic enterprises or organizations who will offer a statement guaranteeing training and employment opportunities for Native Americans. LLHA will give 5% of the total number of available rating points in unrestricted solicitations in consideration of Minority (Other than Indian-Owned) or Woman owned economic enterprises. Other factors that will be considered may include schedule, experience and references, use of

green technologies. Ratings factors may be modified to suit the type of professional service solicited as long as each proposal is rated by the same factors.

700.5 Negotiations. In situations where negotiations are deemed necessary, negotiations shall be conducted with RFP responders who have a reasonable chance of being selected for award based on evaluation factors for technical and price factors as specified in the RFP.

The purpose of negotiations shall be to seek clarification with regard to and advise proposal responders of the deficiencies in both technical and price aspects of their proposals so as to assure full understanding of the solicitation conformance requirements.

All responders shall be treated fairly and equally with respect to any opportunity for negotiation and revision of proposals. No responder shall receive information regarding any other responder's proposal and no one shall receive assistance in bringing their proposal up to the level of any other proposal. Responders shall not be directed to reduce their proposed prices to a specific amount in order to be considered for award. A common deadline will be established for receipt of proposal revisions based on negotiations.

700.6 Award.

Bids shall be opened publicly and in the presence of at least one witness. The bidders may be present at the opening. The bids shall be recorded and the bids shall be available for public inspection.

VIII. Non - Competitive Proposals

800.1 General. A non-competitive proposal is procurement through solicitation of a proposal from only one source. This is often referred to as "Sole Source" procurement.

800.2 Conditions for Use. Non-competitive proposal procurement made be used only when one or more of the following circumstances apply:

- The item is available only from a single source;
- There is a public emergency which will not permit a delay resulting from competitive solicitation. The emergency must pose a threat to public health and safety or to the safety of LLHA property;
- In response to a written request from HUD, other Federal awarding agency or pass-through entity expressly authorizes non-competitive proposals; or
- After solicitation of a number of sources, competition is determined inadequate. 10 days from the date of solicitation must have passed before a sole quotation can be designated "non-competitive".

800.3 Justification. Each procurement based on non-competitive proposals shall supported by a written justification for using such procedures. The justification shall be approved by the Executive Director.

IX. Price and Cost Analysis

900.1 General. LLHA shall perform a cost or price analysis for all procurement that exceeds the Small Purchase threshold including contract modifications and all procurements based on Non-Competitive Proposal. The method and degree of analysis is dependent upon the facts surrounding the particular procurement situation, but as a starting point, independent estimates must be made before receiving bids or proposals.

900.2 Cost and Price Analysis of Non-Competitive Proposals. The bidder shall be required to submit a cost breakdown showing projected costs and profit.

The cost information must be sufficient to allow the LLHA to determine that the cost is reasonable and a current market price that is given to the general public or that the cost has been set by law or regulation.

The profit portion of the breakdown must establish a fair and reasonable profit for this geographical area. Factors that can be considered in determining the fairness of the profit margin are the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, amount of subcontracting and the quality of the contractor's past performances.

900.3 Allowable Costs. Costs are allowable only to the extent that they are consistent with allowable costs for LLHA under NAHASDA. The cost plus a percentage of cost and percentage of construction cost methods of contracting must not be used.

X. Contract Requirements

1000.1 General. LLHA may elect to the contract form which best suits the procurement type. Larger projects involving an architect shall be drawn using the standard AIA Document A101 form; however, contracts below the small purchase threshold may be drawn on LLHA's contract form. All contracts, regardless of form, must contain clauses which will protect the Housing Authority's interests.

1000.2 Required Contract Clauses. Contracts must contain the following clauses:

- Termination of convenience (41 CFR Part 60 1.3)
- Termination of default or cause (41 CFR Part 60 1.3)
- Equal Employment Opportunity Compliance
- Work Start Date and Date of Substantial Completion
- Liquidated Damages Clause
- 10% Retention Clause
- Contract Arbitration Methods
- Sovereign immunity statement

Contracts in excess of \$2,000 must contain the above and additionally:

- Davis Bacon Act Compliance
Contracts over \$10,000 must contain the above and additionally:
- Copeland's "Anti-Kickback" Act -
- Clean Air Act (42 U.S.C. 7401-7671q)
- Federal Water Pollution Control Act (33 U.S.C. 1251-1387)
- Energy Efficiency Standards as contained in the State's energy conservation plan
- Rights to Invention Made Under a Contract or Agreement

Contracts over \$100,000 must contain the above and additionally:

- Contract Work Hours and Safety Standards Act.(40 U.S.C. 3702and 3704)
(Contracts which include work to be performed by mechanics or laborers.
- Byrd Anti-Lobbying Act (31 U.S.C. 1352)-Bidding contractors must file the required certificate.

XI. Bonding Requirements

1100.1 General. Bonding requirements will apply for construction or facility improvement contracts exceeding the Small Purchase threshold to ensure that the Federal interests are adequately protected.

1100.2 Bid Bonds. A bid guarantee from each bidder equivalent to five percent of the bid price will be required. The bond can take the form a bid bond, a certified check, or other negotiable instrument. The bond must accompany the bid.

1100.3 Performance Bonds. A performance bond will be required from the contractor for 100 percent of the contract price.

1100.4 Payment Bonds. A payment bond will be required on the part of the contractor for 100 percent of the contract price.

XII. Ethics in Public Contracting

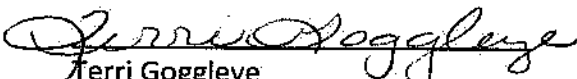
1200.1 General. All parties involved with LLHA procurement shall adhere to legal and ethical codes of conduct. They shall abstain from any actions in procurement that could be interrupted otherwise.


1200.2 Conflict of Interest. No employee, officer or agent of the LLHA shall participate directly or indirectly in the selection or in the award or administration of any contract if a conflict, real or apparent, would be involved. Conflicts real or apparent are described in the LLHA Conflict of Interest Policy. All principles invoked in the LLHA Conflict of Interest Policy apply to procurement.

1200.3 Gratuities, Kickbacks or Use of Confidential Information. No employee, officer or agent of the LLHA shall solicit or accept gratuities, favors or anything of monetary value from contractors, potential contractors or parties to subcontracts and shall not knowingly use confidential information for actual or anticipated personal gain.

1200.4 Prohibition Against Contingent Fees. Contractors shall not retain a person to solicit or secure a LLHA contract for a commission, percentage, brokerage or contingent fee.

I hereby certify that the updated Leech Lake Band of Ojibwe Housing Authority Procurement Policy was duly presented and adopted at a Leech Lake Housing Authority Board of Commissioners Special Meeting by a vote of 3 for, 0 against, 0 silent held on October 08, 2021 at Cass Lake, MN, a quorum being present.


Terri Goggeye
Chairwoman


Amanda Youngrunningcrane
Secretary / Treasurer