



## Memorandum

December 18, 2024

**To:** Board of Trustees  
**From:** Michael Stoddard, Executive Director  
**Re:** Adoption of Proposed Federal Procurement Policy

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### I. Background

The Trust has long operated under procurement guidance outlined in Agency Rule, *Chapter 1: Contracting Process for Service Providers and Grant Recipients*, and the Trust's *Procurement Policy* (2018). The RKO Auditing team indicated in their FY 2024 audit that the Trust should also adopt a standalone Federal Procurement Policy to cover the investment of federal funds. In the audit, RKO indicated that the Trust had been following federal procurement guidelines through contractual flow-down requirements and the Trust's existing policies, but that the Trust would benefit from establishing a standalone written policy to expressly cover uses of federal funds.

Staff has prepared the attached Federal Procurement Policy with reference to the following federal regulations:

- Code of Federal Regulations (CFR) Title 2, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 2 CFR §§200.317-327, Procurement Standards (and Appendix II to Part 200) as applicable to State entities
- 2 CFR §200.112, Conflict of Interest
- 2 CFR §200.113, Mandatory Disclosures

### PROPOSED MOTION

Move to adopt the attached Federal Procurement Policy and authorize the Executive Director to implement the policy and make technical and minor changes to the policy, including where necessary to stay in alignment with updates to federal regulations, without further authorization of the Board.