



Jim Haining <jhaining@gmail.com>

FROM MIKE GIFFORD: New draft of Procurement Policy based on the new revision of the HUD Procurement Handbook 7460.8 REV 3

postmaster@mg.procurementassistance.org <postmaster@mg.procurementassistance.org>

Fri, Jun 5, 2026 at 1:54 PM

Reply-To: mgifford@procurementassistance.org

To: jhaining@gmail.com

**Housing Agency Procurement Assistance**

Housing Agency Procurement Assistance

Procurement Professionals,

I am pleased to distribute, at no charge, the attached revised sample template of a Procurement Policy. This Policy is based on the newly revised Procurement Handbook 7460.8 REV 3 and the latest version of 2 CFR §200.317 - §200.327.

I have utilized as a base document the sample Procurement Policy listed within Appendix No 1 of the revised Handbook (REV 3). It has been my opinion that pertaining to the Procurement Policy, it is best to utilize the HUD sample provided, as many HUD or OIG auditors may be more familiar with this version..

Some thoughts to consider:

(1) Within this document I have made a number of revisions to the base HUD document, including, to make it more "reference and user friendly," I have numbered the sections.

(2) I completed a number of grammatical and punctuation revisions therein. I have also completed a number of revisions to correct incorrect references (such as the listed CFR) that HUD had in their draft.

(3) I have added a number of "guidance notes" (each highlighted in yellow) to help the housing agency make decisions as to certain issues.

(4) As surprising as this statement may sound, I am convinced that this Policy is not the most important procurement document you have. In my opinion, your Procurement Procedures are much more important. Policy's are more "high level" and approved by the Board; however, though Procedures are more "low level," Procedures are what we actually utilize to complete our work.

(4a) I strongly recommend that you do not include within the attached Procurement Policy sample template any detailed work procedures, only somewhat broader Policies. Please remember that Policies are approved by Housing Authority Boards and Procedures are approved by Executive Staff (unless delegated to another staff). If you chose to include Procedures within the Policy, then whenever you change or revise a Procedure (which typically occurs quite often), you have to take the Policy back to the Board for approval, and it is my opinion that doing so often may frustrate the Board or give them concerns as to your procurement programs.

I hope that this information is of a help and wish you the best in all that you do.

Please see the immediate-following Disclaimer that pertains to this information.

DISCLAIMER: I hereby disclose that this revised Procurement Policy, in its revised form, is not to be considered to be a "HUD requirement." This revised Policy is simply my interpretation and recommendation as to how this Policy may be drafted and implemented. By utilizing this sample, the housing authority thereby agrees that the housing agency assumes full responsibility for all content therein, either as originally issued or as revised, and that I assume no responsibility for the same content. Accordingly, pertaining to this Procurement Policy, the housing agency agrees to save, indemnify, and hold me, Michael S. Gifford, and/or my firm, Housing Agency Procurement Assistance, harmless from any result that may occur thereto. Further, the housing agency agrees and confirms that the housing agency has received this information from Michael S. Gifford, dba Housing Agency

Procurement Assistance, at no-charge, meaning, neither Mr. Gifford, nor his firm, has received any money payment from the housing agency for providing this information to the housing agency.

Regards,

Michael S. Gifford, C.P.M., CPSD

Housing Agency Procurement Assistance

I have a consulting practice providing procurement- and contracts-related mentoring, training, and technical assistance to housing agencies. I help housing agencies conduct procurement and contracts in a HUD-compliant and "best practice" manner. [Click here](#) to see my full resume. Please do not hesitate to contact me if you have any questions or concerns pertaining to procurement and contracts (initial answering of questions is "no charge"). As I am either on-the-road or on the phone a lot, an initial contact by e-mail is best; please be sure to include your return telephone number (office/cellular) so that I can call you back.

This email was sent to jhaining@gmail.com by mgifford@procurementassistance.org
of Housing Agency Procurement Assistance
2308 Flower Spring St
Las Vegas, NV 89134
procurementassistance.org | [Unsubscribe from Email Notifications](#) | [Privacy Policy](#)



Housing_Agency_Procurement_Policy__May_2026_.doc

158K