



Procurement **Standard Operating Procedures and Guidelines** MANUAL

This Virgin Islands Housing Finance Authority (VIHFA) manual provides guidance for the VIHFA program. Printed versions are considered uncontrolled. For controlled documents, please visit www.vihfa.gov for the latest version.

How To...

Standard Operating Procedures

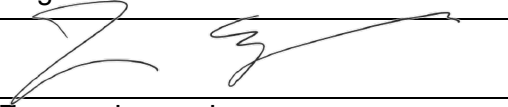
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Standard Operating Guidelines

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Procurement
**How to Prepare an Independent Cost Estimate
for Solicitation**
ICE
STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-001
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
010724-001	1.0	-	Original Document

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1.0 Version Control

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Finance.** Confirms budget availability.
- Director of Procurement & Contracting.** Final approval of ICE before solicitation or contract modification.
- Independent Third-Party Estimator.** Provides signed cost analysis for complex projects.
- Procurement/Contract Officer.** Reviews ICE for completeness, consistency with thresholds, and compliance with policy.
- Program Manager.** Prepares ICE, documents assumptions, submits with procurement request.

- **Requester.** Prepares ICE, documents assumptions, submits with procurement request.

5.0 Specific Procedures

The procedure serves to establish clear policy and instructions for preparing and documenting an independent cost estimate (ICE) in procurement processes. Its underlying aim is to ensure that all procurement decisions are grounded in justified, accurate cost projections.

5.1 Requirements

Objective: The requirements for this section cover the following key actions to ensure effective preparation and documentation of ICE in procurement processes:

- Outline policy requirements for ICE preparation and documentation.
- Support selection of the appropriate procurement method.
- Determine and establish cost reasonableness prior to solicitation or contract modification.
- Provide budgetary guidance and justify procurement actions.
- Detail methodologies for creating an ICE and emphasize documentation and submission practices.

Criteria: The following circumstances require preparation or updating of an ICE:

- Any procurement action exceeding the small purchase threshold:
 - \$10,000 for general procurements
 - \$2,000 for construction-related projects
- Contract cost modifications and informal procurements above these thresholds.
- Changes in market conditions or when more than 120 days have passed since the last ICE was prepared (requiring an updated ICE).

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Verify if the procurement action exceeds the small purchase thresholds: <ul style="list-style-type: none"> □ \$10,000 for general procurements □ \$2,000 for construction-related projects
Requester	2. Confirm whether the requirement applies to contract cost modifications or informal procurements.
Requester	3. Prepare the ICE before issuing a formal solicitation. <ul style="list-style-type: none"> □ Ensure the ICE provides budgetary guidance, supports procurement method selection, and establishes cost reasonableness.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	If more than 120 days have passed or significant market changes occur, update the ICE prior to proceeding.
Requester	<p>4. Choose one or more of the following methods based on the nature and scope of the procurement:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Historical Pricing: Use previous contracts or purchases, adjusting for inflation and scope. <input type="checkbox"/> Published Price Lists or Catalogs: Reference vendor or manufacturer pricing for commoditized items. <input type="checkbox"/> Market Research: Survey vendor websites, request budgetary quotes, or use third-party benchmark data. <input type="checkbox"/> Independent Third-Party Estimator: Engage licensed professionals for complex or high-value projects. <input type="checkbox"/> In-House Technical Estimate: Rely on internal technical staff for well-defined scopes matched with expertise. <input type="checkbox"/> Parametric Cost Estimating: Apply cost models based on measurable project variables.
Requester	5. Document all calculations, assumptions, and sources using the designated ICE Form.
Requester	6. Indicate the chosen procurement method on the Request for Procurement Form.
Requester	7. Attach all supporting documentation to the ICE submission, including quotes, catalogs, market research, or technical estimates.
Requester	8. Submit the completed ICE and all attachments for review and approval prior to issuing solicitations or authorizing contract modifications.
Note	For vendor-based quotes in lieu of ICE, disclose any vendor inability to respond in the procurement file.
Procurement 5 Days	9. Review ICE for completeness, accuracy, and compliance in conjunction with the Request for Procurement, verifying that the cost elements align with the scope of work.
Procedure Ends:	When the ICE is prepared, reviewed, and approved by Procurement leadership and filed in the procurement package.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Third-Party Estimator Certification (if applicable)	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	Records Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	
3	Finance Policy	Sets clear guidelines for the Accounting Department to manage resources efficiently and ensure accountability to stakeholders.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: Sections 200.317–200.320, 200.334)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of

Item Number	Reference	Purpose	Link
			Housing and Urban Development (HUD)
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- ICE.** Independent Cost Estimate
- SOP.** Standard Operating Procedure

3.2 Definitions


- Cost Reasonableness.** Determination that proposed costs are fair and consistent with market conditions.
- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Parametric Estimating.** Cost projections based on measurable project variables.
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.
- Third-Party Estimator.** Licensed professional engaged to prepare ICE for complex projects.



Procurement

How to Conduct a Cost and Price Analysis

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-002
Effective Date:	Feb 5, 2026
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Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA
	Date

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3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Board of Directors.** Reviews analysis for procurements requiring higher-level approval (> \$250,000).
- Director of Procurement & Contracting.** Reviews and approves analyses before award recommendation.
- Evaluation Committee Panel.** Provides input on price reasonableness in competitive evaluations.
- Executive Director.** Reviews analysis for procurements requiring higher-level approval (> \$250,000).
- Finance.** Confirms funding availability and validates cost alignment with budget.

- **Procurement/Contract Officer.** Leads cost/price analysis, completes the form, references ICE and ensures the analysis is properly documented and filed for retention

5.0 Specific Procedures

The purpose of the procedure on cost and price analysis is to ensure that all procurement activities result in fair and reasonable pricing. By systematically evaluating vendor pricing and underlying cost components, the organization can make informed decisions that safeguard financial resources and maintain transparency in the procurement process.

5.1 Requirements

Objective: To ensure effective procurement practices and transparency in decision-making, the procedure requires that the following key actions are undertaken:

- Determine whether proposed prices from vendors are reasonable and justified.
- Provide a documented basis for procurement decisions.
- Comply with organizational and regulatory requirements regarding competitive bidding and pricing analysis.

Criteria: To determine when a thorough cost or price analysis is warranted, the following circumstances trigger a review:

- Receipt of multiple competitive bids (initiates price analysis).
- Receipt of only one bid or a non-competitive procurement (initiates cost analysis).
- Proposal for contract modifications or changes affecting price.
- Receipt of fewer bids than expected, requiring additional scrutiny to ensure pricing remains fair.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procurement/Contract Officer	1. Complete the designated cost or price analysis form for each procurement.
Procurement/Contract Officer	2. Reference the Independent Cost Estimate (ICE) in your analysis.
Procurement/Contract Officer	3. For Price Analysis: <ul style="list-style-type: none"> a. Compare pricing across all competitive bids received. b. Assess bids against the ICE and review historical prices, catalogs, or cooperative agreements. c. Document your findings and justify the award decision, even if submitted bids exceed the ICE, as long as pricing remains reasonable

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procurement/Contract Officer	<p>4. For Cost Analysis:</p> <ul style="list-style-type: none"> a. Conduct when only one bid is received, or for non-competitive procurements and contract modifications. b. Break down and evaluate individual cost components, such as labor, materials, and overhead. c. Confirm that the final price is reasonable based on a detailed assessment of these elements
Note:	<ul style="list-style-type: none"> <input type="checkbox"/> If fewer than expected bids are received, perform additional analysis to confirm price reasonableness. <input type="checkbox"/> Ensure all analyses are thoroughly documented, including direct comparison to the ICE, using the approved analysis form.
Procedure Ends:	When the Cost or Price Analysis Form has been completed by the Procurement/Contract Officer (PCO), it is then reviewed and approved by the Director of Procurement & Contracting.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Cost and Price Analysis Form (standardized template)	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Justification Memo (for sole-source or when fewer bids than expected)	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	Finance Policy	Sets clear guidelines for the Accounting Department to manage resources efficiently and ensure accountability to stakeholders.	

2.2 External References

Item Number	Reference	Purpose	Link
1	HUD 2 CFR 200.324 – Cost/Price Reasonableness	Outlines the requirements for ensuring that costs and prices in federally funded contracts are reasonable and allowable.	eCFR :: 2 CFR 200.324 -- Contract cost and price.
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)

3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement
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3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- ICE.** Independent Cost Estimate
- SOP.** Standard Operating Procedure

3.2 Definitions

- Cost Analysis.** Review of individual cost elements to determine reasonableness (used for non-competitive or sole source).
- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Price Analysis.** Comparison of total prices received through competition, catalogs, or market data.
- Reasonableness of Price.** A determination that the price is consistent with market value, ICE, and regulations.
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.




Procurement

How to Make Credit Card Purchases

\$101 to \$5,000,000

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-003
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

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- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Designated Credit Card Holder.** The credit card holder ensures purchases comply with policy by reviewing documentation, processing authorized transactions, and maintaining accurate records.
- Procurement.** Procurement oversees the purchasing process by verifying requests, ensuring compliance, and guiding transactions through authorization and approval.
- Requester.** The requester initiates purchase by preparing required documentation, obtaining quotes, justifying exceptions, and submitting a complete

package to Procurement.

5.0 Specific Procedures

The purpose of this procedure is to outline the steps required for making credit card purchases on behalf of VIHFA when vendors do not accept VIHFA purchase orders. This ensures purchases are conducted efficiently, transparently, and in accordance with the organization's Credit Card Policy.

5.1 Requirements

Objective: To provide a standardized process for initiating, approving, and documenting credit card purchases, ensuring all transactions are properly authorized, competitively sourced, and fully documented to maintain accountability and compliance.

Criteria: To promote transparency and ensure proper authorization, credit card transactions must satisfy:

- A need arises to purchase goods or services for VIHFA.
- The vendor does not accept VIHFA purchase orders.
- Purchases fall within the range of \$101 to \$5,000,000.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Obtain permission to solicit using the Procurement Request Form.
Requester	2. Develop a detailed scope of work, including: <ul style="list-style-type: none"> <input type="checkbox"/> Equipment or supplies <input type="checkbox"/> Project overview <input type="checkbox"/> Objectives <input type="checkbox"/> Expected deliverables <input type="checkbox"/> Milestones <input type="checkbox"/> Necessary business licenses
Requester	3. Prepare an Independent Cost Estimate (ICE) for purchases greater than \$10,000 (\$2,000 for construction projects).
Requester	4. Obtain a minimum of two written quotes via e-procurement from qualified vendors within three to five business days.
Note	Quotes must be submitted on company's letterhead.
Note	If only one quote is secured, prepare a justification memo for approval by the Executive Director or designee.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	5. Evaluate quotes using the Quotation Evaluation Form.
Note	If the lowest quote is not selected, document the rationale demonstrating best value.)
Requester	6. Issue an Award and Non-award notice to all vendors once selection is approved.
Requester	7. Compile the procurement package: <ul style="list-style-type: none"> <input type="checkbox"/> Request for Procurement Form <input type="checkbox"/> ICE (if applicable) <input type="checkbox"/> Quotes <input type="checkbox"/> Quotation Evaluation Form <input type="checkbox"/> Justification (if needed)
Requester	8. Submit to procurementrequest@vihfa.gov for processing.
Procurement	9. Review the submission within five (5) business days for completeness and compliance.
Procurement	10. Circulate the procurement package to obtain all required internal approvals and signatures in accordance with VIHFA approval authority.
Procurement	11. Forward the fully approved documentation to the Designated Credit Card Holder for processing.
Designated Credit Card Holder	12. Receive approved documentation electronically from Procurement and review the documentation within three business days for accuracy and completeness.
Designated Credit Card Holder	13. Process the purchase in accordance with the credit card policy in PR0-GP-001, Procurement Manual.
Designated Credit Card Holder	14. Retain receipts and submit documentation to accounting for reconciliation and audit.
Procedure Ends:	When the purchase is completed, the credit card statement is reconciled, and all supporting documentation is filed, the procedure ends.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Quotation Evaluation	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	

2.2 External References

Item Number	Reference	Purpose	Link
1	None		

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- ICE.** Independent Cost Estimate
- SOP.** Standard Operating Procedure

3.2 Definitions

- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.




Procurement

How to Procure Micro Purchases

\$101 to \$10,000

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-004
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4.0 Responsibilities

- Accounts Payable.** Processes payment requests.
- Buyer.** Creates purchase orders and routes for approval.
- Contract Administrator.** Drafts and reviews service agreements.
- Director of Procurement & Contracting.** Reviews and approves purchase orders.
- Expeditor.** Creates purchase orders and routes for approval.
- Finance.** Processes payment requests.
- Legal.** Reviews agreements and contract folder for legal sufficiency.

- **Procurement Officer.** Reviews submissions, ensures compliance, and issues purchase orders.
- **Requester.** Prepares Request for Procurement Form, develops scope of work, obtains quotes, and submits full documentation.

5.0 Specific Procedures

The purpose of the micro purchase order policy is to establish clear guidelines for procuring goods and basic services valued between \$101 and \$10,000. This policy aims to ensure transparency, competition, and fiscal responsibility in small-scale procurement processes, while facilitating efficient acquisition of necessary items and services for organizational operations.

5.1 Requirements

Objective: To support the effective management of micro purchase orders, the following objectives guide the procurement process:

- Promote fair and open competition among qualified vendors for purchases within the micro purchase range.
- Ensure compliance with procurement regulations and internal controls.
- Safeguard public funds through documentation and approval workflows.
- Streamline the purchasing process for routine, low-value transactions.

Criteria: The micro purchase order policy is triggered under the following conditions:

- When procurement transactions fall within the range of \$101 to \$10,000.
- When goods or basic services required do not necessitate trade certification.
- When a department identifies the need to acquire goods or services within this cost bracket.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Initiate request by obtaining permission to solicit using the Request for Procurement Form.
Requester	2. Clearly define the requirements, including equipment or supplies, project overview, objectives, expected deliverables, milestones, and necessary business licenses
Requester	3. Prepare and independent cost estimate (ICE): <ul style="list-style-type: none"> □ Required for purchases exceeding \$10,000, and for construction-related projects over \$2,000. The requester conducts this estimate.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	4. Obtain at least two written quotes from qualified vendors using e-procurement methods (websites, email) within three to five business days. All quotes must be on official company letterhead.
Requester	5. Use the Quotation Evaluation Form to select the lowest responsive and responsible bidder. If only one quote is available, prepare a justification memo for approval by the Executive Director or designee.
Executive Director	6. Review and approve quote.
Requester	7. After approval, send the Award and Non-award Form to all vendors who submitted bids.
Requester	8. Forward the complete procurement package to procurementrequest@vihfa.gov for processing. <ul style="list-style-type: none"> <input type="checkbox"/> Request for Procurement Form <input type="checkbox"/> ICE (if applicable) <input type="checkbox"/> Quotes <input type="checkbox"/> Evaluation form <input type="checkbox"/> Justification (if needed)
Procurement	9. Assign Expeditor or Buyer for purchase order creation.
Expeditor or Buyer	10. Purchase Order Creation: <ul style="list-style-type: none"> <input type="checkbox"/> Verify completeness of procurement package (request form, ICE if applicable, quotes, evaluation, justification). <input type="checkbox"/> Ensure compliance with internal procurement thresholds and HUD's and VIHFA's rules. <input type="checkbox"/> Create purchase orders <ul style="list-style-type: none"> o Purchase orders must be sent to the Director of Purchasing and Contracting for approval. <input type="checkbox"/> Maintain procurement log for tracking and audit purposes.
Director of Purchasing and Contracting	11. Review and approve purchase order.
Requester	12. Once approved, acquire goods or services.
Requester	13. Upon completion, the department acknowledges receipt, signs the purchase order as receiving officer, and records invoice details for submission to the Expeditor or Buyer

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	<p>14. Service Agreements (if tradesman required):</p> <ul style="list-style-type: none"> <input type="checkbox"/> Requester obtains relevant corporate documents (see Corporate Document Checklist), liability insurance, and ensures VIHFA is named as additional insured.
Legal	<p>15. Legal Agreement:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Documentation is forwarded to Legal for agreement preparation and review.
Requester	16. Prepare check requests for payments related to purchase orders and service agreements. If a notice to proceed is required, a copy must be sent to procurement.
Procedure Ends:	When the requesting department receives, inspects, and accepts goods and services. Payment is processed and confirmed, and procurement files are archived per records retention policy.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate (ICE) Template	<input type="checkbox"/>
<input type="checkbox"/> Quotation Evaluation	<input type="checkbox"/>
<input type="checkbox"/> Corporate Document Checklist	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	Records Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	
4	Finance Policy	Sets clear guidelines for the Accounting Department to manage resources efficiently and ensure accountability to stakeholders.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: Sections 200.317–200.320, 200.334)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Item Number	Reference	Purpose	Link
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
3	FAR Part 13, Federal Acquisition Regulation: Micro-Purchase Procedures	Outlines the Micro-Purchase Procedures used by federal agencies to acquire goods and services below a certain dollar threshold with minimal administrative burden.	Part 13 - Simplified Acquisition Procedures Acquisition.GOV
4	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- ICE.** Independent Cost Estimate
- PO.** Purchase Order
- SOP.** Standard Operating Procedure


3.2 Definitions

- Conflict of Interest.** A situation where an employee’s private interest interferes with impartial procurement decisions.
- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Justification Memo.** Written explanation required when fewer than two quotes are obtained
- Micro Purchase.** Procurement of goods/services ≤ \$10,000.
- Responsible Bidder.** Demonstrates capacity and integrity to perform.

- **Responsive Bidder.** Vendor who complies with all material requirements of the solicitation.
- **Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.



Procurement
How to Procure Small Purchase Orders
\$10,001 to \$250,000
STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-005
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
010724-001	1.0	-	Original Document

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Accounts Payable.** Processes check requests, ensures budget compliance, and issues payment.
- Contract Administrator.** Prepares and/or reviews contracts or service agreements.
- Director of Procurement & Contracting.** Reviews and approves award recommendations and purchase orders.
- Evaluation Committee.** Reviews bids/proposals and completes evaluation forms (where applicable).

- ❑ **Finance.** Processes check requests, ensures budget compliance, and issues payment.
- ❑ **Legal.** Reviews for legal sufficiency.
- ❑ **Procurement Officer.** Reviews procurement package for compliance, facilitates solicitation process, and documents approvals.
- ❑ **Requester.** Prepares Request for Procurement Form, develops scope of work, and prepares ICE.

5.0 Specific Procedures

The purpose of this procedure is to ensure that all small purchase orders within the \$10,001 to \$250,000 range, and construction-related purchases over \$2,000, are conducted with transparency, fiscal responsibility, and compliance with organizational procurement policies.

5.1 Requirements

Objective: To provide a structured framework for requesting, evaluating, and processing small purchase orders, so that project requirements are clearly defined, costs are accurately estimated, and necessary approvals are obtained prior to any commitment of funds.

Criteria: Review the following criteria to determine when this small purchase order procedure applies:

- A need arises to procure equipment, supplies, or services valued between \$10,001 and \$250,000.
- A construction-related project requires procurement exceeding \$2,000.
- A requestor intends to solicit bids or proposals for goods or services within these thresholds.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Complete the Request for Procurement Form to obtain official permission to begin the solicitation process.
Requester	2. Prepare a detailed scope of work, outlining: <ul style="list-style-type: none"> ❑ Equipment or supplies needed ❑ Project overview ❑ Objectives ❑ Milestones ❑ Deliverables ❑ Business license requirements for performing party

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	3. For purchases above \$10,000 (or above \$2,000 for construction projects), the requestor must develop an independent cost estimate (ICE) to benchmark estimated costs and ensure budget compliance
Requester	1. Submit the completed Request for Procurement Form, detailed Scope of Work, ICE, and supporting documentation to procurementrequest@vihfa.gov for review,
Procurement	2. Process and approve in accordance with PR0-GP-001, Procurement Manual Policies, Section 5.2.
	3. For \$10,001–\$250,000 procurements, obtain a minimum of three written quotes/proposals. <input type="checkbox"/> Solicitations must be distributed equitably, using e-procurement platforms or direct vendor outreach.
	4. Complete a Quotation/Proposal Evaluation Form to assess lowest responsive and responsible bidder. <input type="checkbox"/> If less than three responses are received, prepare a justification memo for approval by the Executive Director or designee.
	5. Issue award recommendation for approval by the Director of Procurement & Contracting. <input type="checkbox"/> Notify winning and non-winning vendors using the Award and Non-Award Notification Form.
Procurement	6. Create purchase order <input type="checkbox"/> Route through the Expeditor or Buyer to Director for approval.
	7. Prepare Contract: <input type="checkbox"/> If required, forward package to Legal for contract drafting and review.
Note	Procurement ensures complete procurement package is archived in compliance with retention policy and audit standards.
Procedure Ends:	When goods or services are delivered and accepted, contract obligations are fulfilled, payment is processed, and the final procurement file is closed and archived.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Quotation/Proposal Evaluation Form	<input type="checkbox"/>
<input type="checkbox"/> Award & Non-Award Notification Templates	<input type="checkbox"/>
<input type="checkbox"/> Justification Memo (for fewer than 3 bids)	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	Record Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	
4	Finance Policy	Sets clear guidelines for the Accounting Department to manage resources efficiently and ensure accountability to stakeholders.	

2.2 External References

Item Number	Reference	Purpose	Link
1	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)

Item Number	Reference	Purpose	Link
			Requirements for Federal Awards
2	Federal Acquisition Regulations (where applicable)	Ensures that procurement is conducted fairly, transparently, and in a manner that promotes competition and best value for taxpayers.	FAR Acquisition.GOV
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms


- ICE.** Independent Cost Estimate
- PO.** Purchase Order
- RFP.** Request for Proposal
- RFQ.** Request for Quote
- SOP.** Standard Operating Procedure

3.2 Definitions

- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Responsible Bidder.** Demonstrates capacity and integrity to perform.
- Responsive Bidder.** Meets all solicitation requirements.
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.



Procurement
**How to Initiate and Manage Formal
Procurements**
Over \$250,000
STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-006
Effective Date:	Feb 23, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Accounting.** Ensures budget compliance, processes payments.
- Board of Directors.** Approves procurements greater than \$250,000.
- Contract Administrator.** Reviews contracts and drafts agreements.
- Evaluation Committee Panel.** Scores proposals, prepares evaluation summary, elects chairperson.
- Executive Director.** Approves solicitations, signs summaries, presents to Board.
- Finance.** Ensures budget compliance, processes payments.
- Legal.** Reviews contracts and ensures sufficiency.

- **Procurement Officer.** Reviews packages, manages solicitation process, coordinates approvals, forwards to Executive Director and Board.
- **Requester.** Prepares Request Form, Scope, ICE, recommends evaluation committee.

5.0 Specific Procedures

The purpose of this procedure is to ensure that all procurement actions exceeding \$250,000 are conducted in a transparent, competitive, and compliant manner, in alignment with organizational policy and legal requirements. The procedure establishes a standardized process for acquiring goods, services, or construction projects of significant value.

Formal procurements include:

- Invitation for Sealed Bid (IFB)
- Non-Competitive Proposal
- Pre-Qualified Pool (PQP)
- Emergency Procurement

5.1 Requirements

Objective: To fulfill the objectives of a robust, transparent, and compliant procurement process, the following requirements must be observed:

- Promote fairness, integrity, and accountability in the procurement process.
- Maximize value for money by enabling competitive bidding and thorough evaluation.
- Mitigate risks associated with large financial commitments through proper documentation, independent cost estimates, and approvals.
- Comply with statutory and regulatory obligations for high-value procurements.
- Document all stages of the procurement for future audits and records.

Criteria: To ensure the integrity and compliance of emergency procurement, the following requirements must be met for transactions exceeding specified thresholds:

- Any procurement action involving purchases, contracts, or commitments with a total value exceeding \$250,000.
- Requests for purchases that meet or surpass the monetary threshold for formal procurement, regardless of the nature of goods, services, or construction.
- Requirement for sealed bids, competitive proposals, or non-competitive proposals as dictated by the value and type of procurement.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Obtain permission to solicit using the Procurement Request Form
Requester	2. Develop a detailed scope of work that describes equipment or supplies, outlines project overview and objectives, specifies expected deliverables, identifies end products and milestones, and indicates the type of business license required.
Requester	3. Conduct an Independent Cost Estimate (ICE) for purchases exceeding \$10,000 or \$2,000 for construction projects.
Requester	4. Compile and forward the procurement package, including all necessary documentation, to procurementrequest@vihfa.gov for further processing. Documents include: <ul style="list-style-type: none"> <input type="checkbox"/> Procurement Request Form <input type="checkbox"/> Scope of Work <input type="checkbox"/> Independent Cost Estimate
Expeditor/Buyer 7 Days	5. Review the procurement submission for completeness and compliance, obtain all required internal approvals and signatures, assign a Procurement Officer (if not self-assigned), and forward the fully signed procurement package to the assigned Procurement Officer for processing.
Procurement Officer 7 Days	6. Collaborate with the Requesting Department to develop and finalize the solicitation package, including the scope of work, evaluation criteria, contract terms, and all required compliance provisions. Submit the completed draft solicitation package for the Division Director's review.
Requester 3 Days	7. Review the draft solicitation package for accuracy, completeness, and alignment with programmatic needs. Provide written approval or consolidated revisions to the Procurement Officer within three (3) business days of receipt.
Procurement Officer 2 Days	8. Route the finalized solicitation package to the Procurement Director for review and signature. Confirm that all required departmental approvals have been obtained prior to submission.
Procurement Officer	9. Prepare solicitation for publishing. Setting target dates for: <ul style="list-style-type: none"> <input type="checkbox"/> Solicitation Release Date <input type="checkbox"/> Pre-bid, proposal, qualification conference date or site visit walk-through (note if mandatory) <input type="checkbox"/> Question submittal deadline

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
2 Days	<input type="checkbox"/> Response to questions deadline <input type="checkbox"/> Respondents' submittal deadline <input type="checkbox"/> Bid Opening (if necessary)
Procurement Officer	10. Recommend members for the Evaluation Committee Panel (ECP) to the Executive Director for approval.
Procurement Officer	11. Notify the ECP upon receipt of bids or proposals and distribute the Conflict of Interest and Confidentiality Form.
Procurement Officer	12. Require each ECP member to sign and submit the Conflict of Interest and Confidentiality forms before accessing evaluation documents.
ECP	13. Evaluate bids or proposals in accordance with the solicitation criteria. Score proposals independently and collectively, deliberate as a committee, and prepare the Evaluation Recommendation Summary within five to seven (5–7) business days (not applicable for RFQ scoring).
Procurement Officer	14. Prepare a cost or price analysis using the Independent Cost Estimate (ICE) and the evaluation results to determine cost or price reasonableness. The analysis shall be documented in the procurement file prior to forwarding the Evaluation Recommendation Summary for Executive Director review.
Procurement Officer	15. Forward the Evaluation Recommendation Summary to the Executive Director for review and signature.
Procurement Officer	a. For the RFQ method, send the summary to the Executive Director for signature. <ul style="list-style-type: none"> i. After approval, add contractors to the Pre-Qualified Pool (PQP) or advance them to the second phase for RFP or A&E Services, ensuring amounts do not exceed \$250,000 without Board of Directors approval.
Procurement Officer	b. For Seal Bids (IFB), Competitive Proposals (RFP or RFP for A&E Services), or Non-Competitive Services: <ul style="list-style-type: none"> i. Forward the summary to the Executive Director ii. Return it to the Procurement Department to include with the board package using the Request for Board Approval Form— as required by Section 10 of the Procurement Policy.
Procurement Officer	16. Send the Request for Board Approval package to the Executive Director.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procurement Officer	17. Distribute Award and Non-award letters to respondents after the Board of Directors' approval, upon receiving the approved Board resolution, and request corporate documents from the awardee.
Contract Administrator	18. Prepare final contracts in the Procurement Department (secure signatures from the awarded contractor and Executive Director).
Contract Administrator	19. Forward copies of signed contracts to the following departments after execution: <ul style="list-style-type: none"> <input type="checkbox"/> Requesting Department <input type="checkbox"/> Legal Department <input type="checkbox"/> Accounting/Finance Department(s) <input type="checkbox"/> Communication Department <input type="checkbox"/> IT Department
Contract Administrator	20. Prepare the Notice to Proceed and supply a copy to the PO for files.
Procedure Ends:	When the contract is executed and the Notice to Proceed is issued.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Conflict of Interest	<input type="checkbox"/>
<input type="checkbox"/> Confidentiality	<input type="checkbox"/>
<input type="checkbox"/> Request for Board Approval	<input type="checkbox"/>
<input type="checkbox"/> Award/Non-Award Letters	<input type="checkbox"/>
<input type="checkbox"/> Notice to Proceed Template	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	Records Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	
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Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit

	(Uniform Guidance: Sections 200.317–200.320)		Requirements for Federal Awards
2	FAR Parts 14 & 15, Federal Acquisition Regulation: Sealed Bidding and Competitive Proposals	Establishes procedures for awarding contracts based on competitive bids.	Part 14 - Sealed Bidding Acquisition.GOV Part 15 - Contracting by Negotiation Acquisition.GOV
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- COI.** Conflict of Interest
- ECP.** Evaluation Committee Panel
- ICE.** Independent Cost Estimate
- IFB.** Invitation for Bids
- PQP.** Pre-Qualified Pool
- RFP.** Request for Proposals
- RFQ.** Request for Qualifications
- SOP.** Standard Operating Procedure

3.2 Definitions


- Evaluation Committee Panel.** A group responsible for reviewing and evaluating proposals or bids submitted in response to a procurement solicitation.
- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Invitation for Bids.** A formal solicitation issued to potential suppliers or contractors inviting them to submit competitive bids for goods or services.
- Pre-Qualified Pool.** A list or group of vendors or contractors who have been screened and approved to provide goods or services, often used as a shortlist for future procurements.
- Request for Proposals.** A formal request issued to potential suppliers or contractors to submit proposals detailing their approach, qualifications, and pricing for a specific project

or service.

- **Request for Qualifications.** A solicitation used to gather information about the qualifications and experience of potential vendors or contractors before inviting them to bid.
- **Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.



Procurement
**How to Execute Change Orders and
Amendments to Contracts and Service
Agreements**
STANDARD OPERATING PROCEDURE

Guideline Number:	PR0-SOP-007
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 <u>3/2/2026</u>
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
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3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Board of Directors.** Reviews and approves amendments exceeding \$250,000 or 25% of original value.
- Contract Administrator.** Drafts amendment and change order. Maintains official contract file.
- Director of Procurement & Contracting.** Reviews amendment for compliance and approves routing for ED/Board.
- Executive Director.** Reviews and signs amendments within delegated authority.
- Finance.** Confirms budget availability and funding compliance.
- Legal Counsel.** Reviews amendments for legal sufficiency.

- **Procurement.** Processes procurement packages from the requester, ensuring all required documentation is complete.
- **Procurement Officer.** Reviews request for compliance, ensures documentation is complete, forwards to Contract Administrator.
- **Requester.** Initiates change request, prepares justification including updated scope and independent cost estimate.

5.0 Specific Procedures

The policy on Change Orders and Amendments to Contracts and Service Agreements is designed to ensure that any modifications to existing contracts are properly documented, justified, and approved. It aims to maintain transparency, accountability, and fiscal responsibility in the procurement process.

5.1 Requirements

Objective: To support robust contract administration, the following objectives guide the management of change orders and amendments:

- Provide a clear, standardized process for requesting and approving changes to contracts and service agreements.
- Ensure that all changes align with organizational goals and budgetary constraints.
- Guarantee that necessary oversight, such as Board approval for significant amendments, is integrated into the workflow.
- Preserve an official record of all amendments, change orders, and supporting documentation.

Criteria: The following criteria outline the circumstances under which a change order or contract amendment should be considered and formally initiated:

- A need arises to alter the scope, cost, deliverables, or timeline of an existing contract or service agreement.
- A correction of errors or omissions in the original contract becomes necessary.
- Project requirements expand or contract, requiring formal modification.
- Cost changes that may affect approval authority or budget thresholds are identified.
- Previous amendments, extensions, or modifications have accumulated and require summary and documentation.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	1. Prepare the change request by drafting a comprehensive description of the proposed change order or amendment.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
	<ul style="list-style-type: none"> <input type="checkbox"/> Include an updated project overview, revised objectives, cost estimates, expected deliverables, and milestones. <input type="checkbox"/> Clearly explain the reason for the change (e.g., expanded scope, error correction).
Requester	<p>2. Complete the Request for Procurement Form:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Enter all contract details, including: <ul style="list-style-type: none"> o Contract or service agreement number o Expiration date o Summary of previous amendments or change orders with associated costs
Requester	3. Specify the nature of the extension or modification being requested.
Requester	4. Complete an independent cost estimate (ICE) for all change orders impacting costs.
Note	Step 4 is required for authority changes and recommended for all others.
Requester	5. Determine if the change falls within budget thresholds and approval authority.
	6. Send the completed and approved change order package to procurementrequest@vihfa.gov for review.
Contract Administrator	<p>7. Verify all supporting documents and drafts the amendment, ensuring the scope, cost, and timeline reflect approved revisions.</p> <ul style="list-style-type: none"> <input type="checkbox"/> Retain the draft amendment in the official contract file.
	<p>8. Board Approval (If applicable):</p> <ul style="list-style-type: none"> <input type="checkbox"/> If the amendment exceeds \$250,000 or 25% of the original contract value, prepare and submit a Board Approval Package, including all relevant forms and justifications, for presentation to the Executive Director and the Board.
Note	No change order or amendment may be carried out until official Board approval is received and documented.
	9. Upon approval, execute the change order or amendment as per the revised contract terms.
Note	Record Retention -- All contract files are retained for 10 years after final payment, or longer as required, and must be audit-ready.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procedure Ends:	When the amendment or change order is fully executed, the updated contract is distributed to all stakeholders, and the complete documentation is filed in the procurement record for retention.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Request for Procurement	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	PR0-SOP-007, How to Administer Contracts	Provides step-by-step instructions on administering contracts.	
4	Record Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR 200.318, General Procurement Standards	Ensures non-federal entities use sound, fair, and transparent procurement practices when spending federal funds.	eCFR :: 2 CFR 200.318 -- General procurement standards.
2	2 CFR 200.324 – Cost and Price Reasonableness	Outlines the requirements for ensuring that costs and prices in federally funded contracts are reasonable and allowable. It applies to recipients and subrecipients	eCFR :: 2 CFR 200.324 -- Contract cost and price.

Item Number	Reference	Purpose	Link
		of federal awards, including those under HUD programs.	
3	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
4	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the US Virgin Islands.	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- ICE.** Independent Cost Estimate
- SOP.** Standard Operating Procedure

3.2 Definitions


- Amendment.** A formal modification to contract terms.
- Board Approval Package.** A set of documents required to present amendments to the Board.
- Change Order.** A written order directing changes in scope, cost, or schedule under an existing contract.
- Independent Cost Estimate.** An objective estimate of anticipated costs for a planned purchase or construction project.
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.



Procurement

How to Administer Contracts

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-008
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
010724-001	1.0	-	Original Document

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Board.** Approves amendments and change orders beyond thresholds.
- Contract Administrator.** Manages day-to-day operations, ensures compliance and performance monitoring, oversees amendment processing, addresses issue resolution, and conducts contract closeout throughout the contract lifecycle. Execute monitoring and oversight functions. All activities are performed transparently and in strict accordance with organizational policies and legal requirements.
- Contracting Director.** Assigns Contract Administrator. Ensures compliance with policy.

- **Executive Director.** Approves amendments/change orders beyond thresholds.
- **Finance.** Verifies payments, funding alignment, and financial compliance.
- **Legal.** Reviews amendments, disputes, and contract sufficiency.
- **Procurement.** Processes procurement packages from the requester, ensuring all required documentation is complete.
- **Procurement Specialist.** Supports Contract Administrator in documentation and record management.

5.0 Specific Procedures

The purpose of this procedure is to provide a structured framework for the administration of all contracts executed by VIHFA. This ensures that contracts are managed, monitored, and closed out in compliance with VIHFA policy, funding regulations, and contractual obligations.

5.1 Requirements

Objective: To establish a structured and controlled contract administration process that ensures:

- Continuous monitoring of contractor performance from contract execution through closeout
- Verification that deliverables, milestones, and contractual obligations are met
- Ongoing compliance with contractual terms, funding requirements, and applicable laws
- Proper documentation of monitoring activities to maintain audit readiness
- Timely identification and resolution of performance or compliance issues
- Accurate processing of amendments and change orders
- Proper reconciliation and closeout of all contractual obligations

Criteria: Contract administration and monitoring procedures shall be initiated when any of the following occur:

- Execution of any contract, task order, service agreement, or amendment by VIHFA
- Issuance of a notice to proceed
- Submission of deliverables or invoices for review and payment
- Request for amendment, modification, or change order
- Identification of contractor performance concerns or compliance deficiencies
- Contract expiration or completion requiring closeout

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	Execution of a contract automatically activates formal monitoring responsibilities assigned to the Contract Administrator.
Procurement	1. Establish an official contract file upon contract execution, including: <ul style="list-style-type: none"> <input type="checkbox"/> All supporting documents <input type="checkbox"/> Compliance records <input type="checkbox"/> Schedules <input type="checkbox"/> Deliverables
Procurement	2. Assign a contract administrator responsible for day-to-day oversight and serving as the liaison between VIHFA and the contractor.
Contract Administrator	3. Organize a kick-off meeting with all stakeholders to clarify: <ul style="list-style-type: none"> <input type="checkbox"/> Scope <input type="checkbox"/> Deliverables <input type="checkbox"/> Compliance needs <input type="checkbox"/> Communication protocols
Note	Kick-off meetings are mandatory for contracts over \$100,000 or of high complexity.
Contract Administrator	4. Track contractor compliance documents, updating a Compliance Log quarterly and notifying contractors 30 days before document expiration.
Contract Administrator	5. Review deliverables against the Statement of Work (SOW) and timeline, using a Contract Performance Report to document progress and note any deficiencies.
Contract Administrator	6. Manage amendment and change order by reviewing and processing requested amendments to include: <ul style="list-style-type: none"> <input type="checkbox"/> Preparing an Independent Cost Estimate (ICE) if costs change <input type="checkbox"/> Drafting documentation <input type="checkbox"/> Updating the Amendment Log <input type="checkbox"/> Coordinating Board approval if thresholds are exceeded
Contract Administrator	7. Document and resolve minor disputes
Note	Material issues are escalated to management per policy.
Contract Administrator	8. Close the contract by: <ul style="list-style-type: none"> <input type="checkbox"/> Verifying receipt and acceptances of all deliverables <input type="checkbox"/> Reconciling payments

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
	<input type="checkbox"/> Ensuring compliance <input type="checkbox"/> Confirming return of assets <input type="checkbox"/> Completing the Contract Closeout Form
Note	Record Retention -- All contract files are retained for 10 years after final payment, or longer as required, and must be audit-ready.
Procedure Ends:	When all contract obligations are met, deliverables are accepted, payments reconciled, the closeout form is completed, and the file is archived for retention.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Contract File Checklist	<input type="checkbox"/>
<input type="checkbox"/> Compliance Log Template	<input type="checkbox"/>
<input type="checkbox"/> Contract Performance Report	<input type="checkbox"/>
<input type="checkbox"/> Independent Cost Estimate	<input type="checkbox"/>
<input type="checkbox"/> Contract Closeout	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	PR0-SOP-001, How to Prepare an Independent Cost Estimate	Provides step-by-step instructions on preparing an ICE.	
3	PR0-SOP-002, How to Conduct a Cost and Price Analysis	Provides step-by-step instructions on preparing cost or price analysis.	
4	Record Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance Sections 200.317–200.326)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards

Item Number	Reference	Purpose	Link
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the US Virgin Islands.	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- SOP.** Standard Operating Procedure

3.2 Definitions

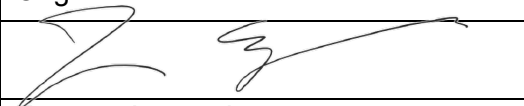
- Amendment and Change Order.** Written modification of terms, scope, or cost of a contract.
- Closeout.** Formal process of completing all administrative actions and confirming fulfillment of contractual obligations.
- Compliance Log.** Record of contractor certifications, licenses, and required documents
- Standard Operating Procedure.** Detailed document that outlines the steps required to perform specific tasks or processes that ensure consistency and compliance with legal and other requirements.



Procurement

How to Evaluate Proposals

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-009
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA
	Date

Version Control Table

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Board of Directors.** Review and approve procurements exceeding \$250,000.
- Contract Administrator.** Responsible for preparing procurement contracts valued at less than \$250,000 following approval of the report.
- Director of Procurement & Contracting.** Reviews evaluation report for compliance and accuracy.
- Evaluation Committee Panel.** Independently scores proposals and signs the final evaluation report.
- Executive Director.** Reviews and approves evaluation report.

- **Procurement.** Maintains comprehensive records of official evaluations and procurement activities.
- **Procurement/Contract Officer.** Serves as Evaluation Committee Chair (non-rating), overseeing the evaluation process, preparing the evaluation report, ensuring compliance with conflict-of-interest policies, and submitting all reports through the Director and Executive Director.

Summary Table
Responsible Parties and Documentation

Stage	Responsible Party	Required Document
Responsiveness Review	Procurement Officer	Responsiveness Checklist
Evaluation Review	Evaluation Committee	Evaluation Score Sheets and Summary Report
Responsibility Review	Procurement Division	Responsibility Determination Memorandum
Final Award Review	Executive Director Board of Directors	Evaluation Package and Award Recommendation

5.0 Specific Procedure

The SOP establishes the standardized process for evaluating bids and proposals in all procurement methods, ensuring fairness, transparency, compliance with HUD and Virgin Islands procurement laws, and consistency across thresholds.

5.1 Requirements

Objective: The following requirements must be met to uphold the integrity and compliance of the evaluation process:

- Ensure evaluations are objective, consistent, and documented.
- Safeguard against bias or conflicts of interest.
- A minimum evaluation score of 75% is required for a proposal to be considered technically acceptable and eligible to proceed beyond the evaluation phase.
- Ensure each proposal attains at least a 75% evaluation score to be considered technically acceptable and eligible to proceed to the next stages of the evaluation process.
- Comply with HUD 2 CFR 200, Virgin Islands Code Title 31, and VIHFA procurement policies.

Criteria: Evaluation is triggered upon receipt of bids or proposals requiring committee review.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	Responsiveness Review – Ensure each submission meets the basic administrative, format, and submission requirements of the solicitation.
Procurement/Contract Officer (PCO)	Verify Submission Deadline: 1. Check that proposals were received on or before the stated deadline.
PCO	Confirm Documentation: 2. Ensure all required forms, certifications, and attachments are present and properly signed.
PCO	Check Credentials: 3. Verify that professional licenses, insurance certificates, and other necessary documents are current.
PCO	Assess Responsiveness: 4. Confirm that the proposal addresses the scope of work outlined in the solicitation.
PCO	Document Outcome: 5. Completes and files the Responsiveness Review Checklist in the official procurement record.
Note	Evaluation Review – Evaluate and score technically responsive proposals using the published criteria.
Evaluation Committee Panel (ECP)	Review Proposals: 6. Members individually review each responsive proposal, focusing only on the evaluation factors specified in the solicitation
ECP	Score Proposals: 7. Each member completes and signs their individual Evaluation Score Sheet.
ECP	Submit Scores: 8. All members submit completed score sheets to Procurement/Contract Officer for compilation.
Procurement/Contract Officer	Compile and Rank: 9. Average scores, rank proposals, and prepare the Evaluation

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	Summary Report.
Note	<p>The following criteria determine which proposals will advance or be excluded from the subsequent stages of the procurement process:</p> <ul style="list-style-type: none"> □ Only vendors receiving a minimum cumulative evaluation score of 75% or higher shall advance to the next phase of the procurement process, including responsibility review, discussions, negotiations, or award consideration. □ Proposals scoring below 75% shall be eliminated from further consideration. This determination shall be clearly documented in the Evaluation Summary Report and retained in the official procurement record.
Director of Procurement & Contracts	<p>Review and Approve:</p> <p>10. Review results, then submit to Executive Director for concurrence and, if required, Board of Directors for final approval.</p>
Note	Responsibility Review – Confirm that the top-ranked respondent is a responsible firm capable of performing the work and compliant with VIHFA policy.
Procurement Division (led by Director of Procurement & Contracts)	<p>Legal and Financial Verification:</p> <p>11. Verify the firm’s legal standing, licenses, insurance, and financial capacity.</p>
Procurement Division	<p>Debarment Check:</p> <p>12. Confirm the firm’s debarment and suspension status via SAM.gov and local registries.</p>
Procurement Division	<p>Performance and References:</p> <p>13. Review past performance and references.</p>
Procurement Division	<p>Integrity and Ethics:</p> <p>14. Evaluate business integrity, ethical conduct, and checks for conflicts of interest.</p>
Procurement Division	<p>Financial Assessment:</p> <p>15. Assess financial capability and stability to perform the contract.</p>
Procurement Division	<p>Document Outcome:</p> <p>16. Issue a Responsibility Determination Memorandum, signed</p>

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
	by the Director of Procurement & Contracts and filed in the procurement record.
Note	Final Award Review and Documentation – Ensure all reviews are documented and the award recommendation is properly approved.
Procurement/Contract Officer	Prepare Evaluation Package: 17. Assemble all required documents from previous stages.
Executive Director or Board of Directors (if required)	Review, Endorse, and Award Evaluation Package: 18. Review and endorse the Evaluation Package and Award Recommendation.
Contract Administrator	Contract Preparation: 19. For proposals ≤ \$250,000, the prepares the contract
Procurement/Contract Officer	20. For proposals > \$250,000, prepares Board Approval Package and supporting documents.
Procurement	File Documentation: 21. Ensure all documents are filed in the official procurement record in accordance with VIHFA’s record-retention requirements.
Procedure Ends:	When contracts are prepared and the evaluations are filed for procurement records.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Conflict of Interest & Confidentiality	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	Record Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	
3	Finance Policy	Sets clear guidelines for the Accounting Department to manage resources efficiently and ensure accountability to stakeholders.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: Sections 200.317–200.320, 200.334)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
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Item Number	Reference	Purpose	Link
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- COI.** Conflict of Interest
- ECP.** Evaluation Committee Panel
- ICE.** Independent Cost Estimate
- PCO.** Procurement/Contract Officer (Evaluation Chair)

3.2 Definitions


- Evaluation Report.** Document summarizing record findings and rationales, supporting both accountability and informed selection throughout the selection process.



Procurement

How to Establish Governance and Ensure Compliance for Capital Asset Transactions

STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-010	
Effective Date:	Feb 5, 2026	
Version Number:	1.0	
Revision Date:	Original Document	
Approved by:		3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA	Date

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3.0 Scope

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- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Accounting and Other Relevant Departments.** Collaborates with the Procurement Department to ensure proper asset classification, capitalization, tagging, and inventory tracking.
- Procurement Department.** Reviews and approves capital asset procurements for compliance with procurement methods, competitive standards, approval authority, and federal requirements. Prevents artificial structuring to avoid thresholds and approval. Coordinates with divisions to identify and track assets, ensuring clear documentation of descriptions, quantities, costs, funding, and federal award

details. Oversees contract approvals and vendor selection per policy and manages asset transfers or dispositions in line with all requirements. Maintains related records in accordance with retention policies and applicable laws.

- **Requestor.** (Department or Individual). Coordinates with the Procurement Division to identify needs and confirm asset classification. Initiates and solicits capital asset acquisitions in compliance with the Procurement Policy and relevant territorial and federal procurement requirements.

5.0 Specific Procedure

The procedure outlines the steps and responsibilities required to ensure that all capital asset acquisitions and dispositions are conducted in accordance with PR0-GP-001, Procurement Policy Manual, applicable territorial and federal procurement requirements, and internal controls. It is designed to reinforce compliance, clarify oversight boundaries, and maintain audit-ready documentation for all relevant activities.

5.1 Requirements

Objective: The procedure reinforces compliance, prevents circumvention of procurement standards, and maintains audit-ready documentation.

Criteria: Triggers for applying this section include any organizational activities involving:

- Initiation of capital assets
- Solicitation for capital assets
- Acquisition of capital assets
- Administration of capital assets
- Disposition of capital assets

Particularly relevant when activities:

- May involve federal funds
- Require cross-departmental coordination

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	<p>Initiation and Solicitation</p> <ul style="list-style-type: none"> □ All capital asset acquisitions, whether capitalized or designated as controlled assets, must be initiated and solicited in accordance with the Authority’s Procurement Policy and all applicable territorial and federal procurement requirements.
Requestor	<ol style="list-style-type: none"> 1. Coordinate with Procurement to identify the need and confirm asset classification.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procurement	<p>Procurement Method and Competitive Process</p> <p>2. Review the proposed acquisition to determine and apply the appropriate procurement method, competitive process, and approval authority as outlined in PR0-GP-001, Procurement Policy Manual.</p>
Procurement	<p>3. Ensure that purchases are not artificially divided or structured to circumvent procurement thresholds, approval requirements, or competitive standards.</p>
Procurement	<p>Approval and Vendor Selection</p> <p>4. Oversees contract approval and vendor selection, maintaining exclusive authority as per PR0-GP-001, Procurement Policy Manual.</p>
Note	Any conflicts between territorial, federal, or internal requirements are resolved by applying the most restrictive standard.
Procurement	<p>Coordination with Accounting and Other Divisions</p> <p>Coordinates with Accounting and other relevant divisions to ensure:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Correct asset classification <input type="checkbox"/> Capitalization <input type="checkbox"/> Tagging <input type="checkbox"/> Inventory tracking
Note	<p>Documentation and Compliance</p> <ul style="list-style-type: none"> <input type="checkbox"/> Procurement and contract documentation must clearly identify asset descriptions, quantities, unit costs, funding sources, and, where required, applicable federal award information.
Procurement	Maintain all procurement records related to capital asset acquisitions and dispositions in accordance with record retention requirements set forth in the PR0-GP-001, Procurement Policy Manual and applicable law.
Note	<p>Disposition of Capital Assets</p> <ul style="list-style-type: none"> <input type="checkbox"/> Where applicable, any transfer, sale, or disposition of capital assets must be conducted in accordance with: <ul style="list-style-type: none"> ○ PR0-GP-001, Procurement Policy Manual ○ Applicable approval requirements ○ Federal disposition rules
Procedure Ends:	When all procurement records related to acquisitions and dispositions are properly maintained as required by policy and law, the procedure is considered complete.

Appendices

1.0 Internal and External References

1.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Policy Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	FN0-GP-002, Capital Assets Policy	Establishes clear guidelines for the management, utilization, and oversight of capital assets within the organization. This policy ensures that all capital assets are acquired, tracked, maintained, and disposed of in accordance with relevant regulations and organizational objectives, thereby supporting accountability, compliance, and the effective stewardship of resources.	
3	IT0-SOP-003, How to Manage E-Waste Reassignment, Disposals, and Donations	Ensures all e-waste is managed in a manner that maximizes value recovery, maintains compliance with environmental regulations, and supports organizational accountability. By outlining the steps for properly processing e-waste, the SOP helps safeguard sensitive data, protect organizational interests, and ensure that electronic assets are disposed of or reassigned in an environmentally responsible and legally compliant way.	
4	RT0-SOP-001, How to Manage Capital Assets for Facilities, Furniture, and Fleet	Outlines steps for tracking, maintaining, and overseeing facilities, furniture, and fleet assets to ensure their proper	

Item Number	Reference	Purpose	Link
		utilization, accountability, and compliance with relevant policies and regulations. The SOP aims to help the VIHFA protect its investments, support operational needs, and maintain accurate records throughout the asset lifecycle.	

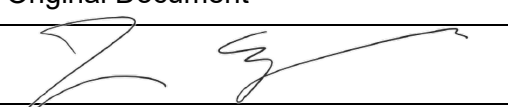
2.0 Glossary of Terms

2.1 Definitions

- **Accountability.** The obligation to ensure assets are properly managed, utilized, and recorded in accordance with organizational policies and regulations.
- **Asset Lifecycle.** The entire process of managing an asset from acquisition to disposal, including tracking, maintenance, and recordkeeping.
- **Capital Assets.** Long-term assets such as buildings, equipment, or vehicles that are used in operations and have a useful life extending beyond a single year.
- **Compliance.** Adherence to established policies, procedures, and relevant external regulations regarding asset management.
- **Facilities.** Physical structures or buildings owned or managed by the organization for conducting its operations.
- **Fleet.** A group of vehicles owned or leased by the organization and used for official business purposes.
- **Furniture.** Movable objects intended to support various human activities, including desks, chairs, and cabinets, used within the organization's facilities.
- **Maintenance.** The ongoing process of servicing and repairing assets to preserve their condition and functionality.
- **Tracking.** Monitoring the location, status, and condition of assets through systematic recordkeeping.



Procurement
How to Ratify Unauthorized Commitments
 STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-011						
Effective Date:	Feb 24, 2026						
Version Number:	1.0						
Revision Date:	Original Document						
Approved by:	 3/2/2026						
	<table style="width: 100%; border: none;"> <tr> <td style="width: 60%; border: none;">Name</td> <td style="width: 40%; border: none;">Date</td> </tr> <tr> <td style="border: none;">Title</td> <td style="border: none;"></td> </tr> <tr> <td style="border: none;">Division</td> <td style="border: none;"></td> </tr> </table>	Name	Date	Title		Division	
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Title							
Division							

Version Control Table

MOC Number	Version Number	Date Revised	Description
070124-001	1.0	-	Original Document

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Executive Director.** Reviews the complete ratification package, including Procurement and Finance determinations. Issues the final written ratification determination (Approved, Approved with Conditions, or Denied). Authorizes payment if ratification is approved. Ensures corrective measures are implemented to prevent recurrence.
- Finance.** Independently verifies funding availability at the time the unauthorized commitment was made. Confirms cost allowability under the applicable funding source. Validates invoice amounts and budget alignment. Provides written financial determination prior to Executive Director review.

- **Legal.** (When Required) Reviews high-risk, complex, or legally sensitive ratification matters. Provides written advisory opinion regarding contractual sufficiency or legal exposure. Legal review is advisory and does not constitute approval authority.
- **Procurement.** Reviews the ratification request for completeness and procurement compliance. Conducts cost or price analysis to determine price reasonableness. Verifies vendor responsibility and eligibility (including SAM verification, if federally funded). Determines whether the procurement would be proper if authorized. Documents a written procurement determination. Forwards the ratification package to Finance for independent financial review. Routes to Legal when required based on risk or complexity.
- **Requesting Department.** Initiates the ratification request upon discovery of an unauthorized commitment. Submits complete written justification and all supporting documentation. Certifies that the commitment was made without proper delegated authority. Confirms that goods or services were received and benefited VIHFA.

5.0 Specific Procedure

The procedure establishes a framework for ratifying unauthorized commitments only when VIHFA has received a clear benefit and the procurement would have complied with applicable procedures if properly authorized. This process is not intended to bypass procurement thresholds, competitive requirements, or internal approvals. It reinforces accountability by ensuring that repeated unauthorized commitments may lead to disciplinary actions and that ratification approval does not absolve employees of responsibility for adhering to established procurement protocols.

5.1 Requirements

Objective: The objective is to establish a structured and controlled process for evaluating and resolving unauthorized commitments. This process aims to protect the Authority from financial and audit risk, ensure price reasonableness, confirm funding allowability, document corrective actions, and preserve the integrity of the procurement process.

Criteria: Ratification may be considered only if all the following conditions are met:

- The goods or services have already been received or performed.
- The Authority has received a measurable benefit.
- The price is determined fair and reasonable.
- The procurement would have been allowable under applicable procurement regulations.
- Funds were available at the time the unauthorized commitment was made.
- The individual who made the unauthorized commitment lacked proper authority.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	Ratification shall not be approved if the procurement violated federal law, territorial law, or fundamental competitive requirements.
Requesting Department	Request a ratification: <ol style="list-style-type: none"> 1. Submit a formal written ratification request to Procurement Request inbox at procurementrequest@vihfa.gov within five business days of discovery.
Note	The request must include: <ul style="list-style-type: none"> <input type="checkbox"/> Justification letter with a detailed explanation of circumstances <input type="checkbox"/> Description of goods/services received <input type="checkbox"/> Vendor name and documentation (invoice, agreement, etc.) <input type="checkbox"/> Confirmation of benefit received <input type="checkbox"/> Certification that the commitment was made without delegated authority <input type="checkbox"/> Funding source identification
Procurement	Procurement Review: <ol style="list-style-type: none"> 2. Review documentation for completeness
Procurement	3. Conduct cost or price analysis
Procurement	4. Verify vendor responsibility and SAM status (if federally funded)
Procurement	5. Determine whether the procurement would have been allowable if authorized
Procurement	6. Inspect for deficiencies <ol style="list-style-type: none"> a. If deficiencies exist, return for correction. b. If no deficiencies, forward the ratification package to Finance for independent financial review.
Finance	Finance Review: <ol style="list-style-type: none"> 7. Verify funds were available at time of commitment
Finance	8. Confirm allowability under funding source
Finance	9. Validate invoice accuracy and budget alignment
Finance	10. Provide written financial determination

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Note	Finance shall not approve ratification; Finance provides funding validation only and returns to Procurement.
Legal	Legal Review (if required) 11. Conduct a legal review for sufficiency
Executive Director	Executive Determination: 12. Review Procurement and Finance determinations and issues final written decision.
Procurement	Corrective Action Determination: 13. If ratification is approved, Procurement shall document corrective measures to prevent recurrence, which may include training, written notice, or internal control reinforcement.
Procurement	Records and Retention 14. Retain ratification files for a minimum of 10 years following final resolution. <ul style="list-style-type: none"> <input type="checkbox"/> Longer if required by: <ul style="list-style-type: none"> ○ Funding source regulations ○ Audit resolution ○ Litigation hold
Note	Files must remain complete, organized, and audit-ready throughout the retention period.
Note	The complete ratification file shall include, at minimum: <ul style="list-style-type: none"> <input type="checkbox"/> Ratification request memorandum <input type="checkbox"/> Vendor invoice and supporting documentation <input type="checkbox"/> Procurement determination memorandum <input type="checkbox"/> Cost or price analysis <input type="checkbox"/> SAM verification (if applicable) <input type="checkbox"/> Finance funding verification memorandum <input type="checkbox"/> Legal review memorandum (if applicable) <input type="checkbox"/> Executive Director determination <input type="checkbox"/> Payment documentation (if approved) <input type="checkbox"/> Corrective action documentation
Procedure Ends:	When the Executive Director approves, conditionally approves, or denies the ratification request in writing, payment is processed or denied as determined. The complete ratification file, with Procurement and Finance decisions, is finalized and kept per Records Retention Policy.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> No Forms	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	

2.2 External References

Item Number	Reference	Purpose	Link
1	None		

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

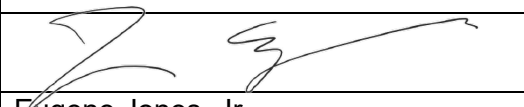
- SAM.** System for Award Management

3.2 Definitions

- Ratify.** To officially approve or confirm an agreement, treaty, or decision, typically through a formal vote or process by an authoritative body such as a legislature or organization.
- System for Award Management.** Used for registering organizations and individuals who wish to do business with the federal government. It serves as a central repository for various federal procurement, grant, and award processes, providing access to contract opportunities, entity registrations, and related compliance information.



Procurement
**How to Process Indefinite Delivery/Indefinite
 Quantity Task Order Requests**
 IDIQ
 STANDARD OPERATING PROCEDURE

Procedure Number:	PR0-SOP-012
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
070124-001	1.0	-	Original Document

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3.0 Scope

This SOP will cover administrative processes as individual specific procedures. These will be outlined with the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Task Assigned To.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Procedure Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Board of Directors.** Approves Task Orders that exceed the Executive Director's delegated authority.
- Executive Director.** Approves and executes Task Orders within the delegated authority.
- Procurement/Contract Administrator.** Serves as the centralized intake and control point; validates requests; solicits and evaluates contractor proposals; conducts cost or price analysis; negotiates scope and pricing; prepares and issues Task Orders; maintains official records.

- **Requester.** Identifies service needs, prepares complete procurement request packages, develops Independent Cost Estimates (ICEs), and submits requests to Procurement.

5.0 Specific Procedure

The procedure ensures consistent, centralized, and compliant utilization of IDIQ contracts while maintaining cost reasonableness, internal controls, and compliance with HUD, federal, and territorial procurement requirements.

5.1 Requirements

Objective: The SOP ensures that all services procured under IDIQ contracts are properly requested and justified by program staff, fall within the scope of the underlying IDIQ contract, are supported by a documented independent cost estimate, undergo a documented cost or price reasonableness analysis, and are authorized solely through fully executed task orders.

Criteria: This guideline applies under the following circumstances:

- A VIHFA department requires services through an active IDIQ contract.
- A procurement request is made for professional or technical services pursuant to an IDIQ agreement.
- The scope, schedule, or pricing negotiations are necessary for a specific service.
- A Task Order under an IDIQ contract is issued or amended.

5.2 Procedure

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Requester	Initiate Process: <ol style="list-style-type: none"> 1. Submit a complete procurement request package to the Procurement Inbox, including: <ul style="list-style-type: none"> □ Approved Procurement Request Form □ Detailed Scope of Work □ Independent Cost Estimate (ICE) □ Funding confirmation and program requirements
Note	Incomplete submissions are returned without action.
Procurement	Initial Review and Validation: <ol style="list-style-type: none"> 2. Verify completeness, funding availability, and contract scope alignment.
Procurement	3. Validate ICE methodology and assumptions.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Procurement	4. Assign Contract Administrator.
Procurement/Contract Administrator	Solicitation of Proposal: 5. Transmit approved Scope of Work to the appropriate IDIQ contractor.
Procurement/Contract Administrator	6. Request detailed technical and cost proposal within 15 days.
Note	Departments are prohibited from direct contractor communications.
Procurement	Proposal Evaluation and Cost Analysis: 7. Review labor categories, hours, and rates against contract ceilings.
Procurement	8. Compare proposed cost to ICE.
Procurement	9. Assess allowability, allocability, and reasonableness in accordance with 2 CFR Part 200.
Procurement	10. Prepare written cost/price analysis memorandum.
Procurement, Requester	Unreasonable Pricing Resolution: 11. If proposed pricing exceeds the ICE and is determined unreasonable: a. Negotiate labor mix, hours, scope, or approach.
Procurement, Requester	b. Request revised proposal or additional justification.
Procurement, Requester	c. Reduce scope to align with funding.
Procurement, Requester	d. Decline to issue a Task Order if reasonableness cannot be established.
Note	Where multiple IDIQ awardees exist, Procurement may solicit another awardee.
Procurement	Task Order Preparation: 12. Prepare Task Order defining scope, deliverables, period of performance, and Not-To-Exceed amount.
Procurement	13. Obtain required internal approvals.

Trigger	At least one criterion of §5.1 listed above must be met.
Task assigned to:	
Executive Director, Board	Approval and Execution: 14. Approve and execute Task Order in accordance with delegated authority thresholds.
Procurement, Requester	15. Issue fully executed Task Order to contractor.
Note	No work may begin prior to execution.
Procedure Ends:	When a fully executed Task Order is issued or when the request is formally declined.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Task Order Template	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: Sections 200.317–200.320, 200.334)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the executive branch of the Government of the U.S. Virgin Islands (GVI).	Procurement - Virgin Islands Department of Property and Procurement

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- **ICE.** Independent Cost Estimate
- **IDIQ.** Indefinite Delivery / Indefinite Quantity
- **NTE.** Not-To-Exceed
- **SOG.** Standard Operating Guideline

3.2 Definitions


- **Cost/Price Analysis.** The process used to evaluate a contractor's proposed costs or prices to determine whether they are allowable, allocable, and reasonable for the proposed scope of work.
 - Cost analysis involves a detailed review of individual cost elements (e.g., labor categories, hours, rates, and other direct costs) and is typically used when adequate price competition is not available.
 - Price analysis evaluates the overall proposed price without examining individual cost elements and may include comparisons to Independent Cost Estimates, historical pricing, or market data.
- **Indefinite Delivery/Indefinite Quantity.** A type of contract that establishes general terms, conditions, labor rates, and scope for services to be performed on an as-needed basis, without guaranteeing a minimum quantity of work. Specific services, schedules, and compensation are authorized only through separately issued Task Orders, each with a defined scope and Not-To-Exceed amount.
- **Independent Cost Estimate.** A documented estimate prepared by VIHFA to determine expected reasonable cost prior to receiving a contractor proposal.



Procurement

How to Protest a Bid

STANDARD OPERATING GUIDELINE

Guideline Number:	PR0-SOG-001
Effective Date:	Feb 5, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
010724-001	1.0	-	Original Document

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2.0 Guideline Reviews and Modifications

Guideline reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

The standard operating guideline (SOG) outlines administrative processes as specific tasks, detailed in the following subsections:

- **Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- **Criteria.** The standard on which a judgement or decision is based.
- **Trigger.** A condition that initiates activities to perform.
- **Responsible Party.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- **Guideline Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- **Executive Director.** Reviews and approves the final protest determination. Authorizes corrective action, if applicable. Ensures final decisions are issued to the protestor.
- **Procurement Director.** Oversees the bid protest process to ensure compliance with applicable procurement laws, regulations, and VIHFA policies. Appoints the Protest Review Committee, when applicable. Reviews committee findings and forwards recommendations to the Executive Director. Ensures corrective actions are implemented when a protest is sustained.

- **Procurement Staff.** Receives, logs, and timestamps bid protests. Acknowledges receipt of protests and communicates procedural requirements to protestors. Maintains official protest files and supporting documentation. Provides records and administrative support to the Protest Review Committee.
- **Protest Review Committee.** Applies only when a committee is appointed. Conducts an independent and impartial review of the protest. Evaluates procurement actions, documentation, and compliance with governing requirements. Prepares written findings, conclusions, and recommendations. Submits a formal report to the Procurement Director.

5.0 Specific Guidelines

The guideline provides a fair, transparent, and systematic process for addressing and resolving concerns raised by bidders regarding procurement activities. This ensures that all complaints are handled consistently, in compliance with organizational policy, and with respect for due process. It also helps safeguard the integrity of the procurement process by allowing for the identification and correction of errors or misjudgments.

5.1 Requirements

Objective: The following objectives guide the contract administration process to ensure effectiveness and compliance at every stage:

- Guarantee consistency in contract oversight and documentation.
- Ensure contractor performance aligns with agreed terms.
- Maintain regulatory and legal compliance throughout the contract lifecycle.
- Facilitate timely closeout and record retention, supporting audit readiness.

Criteria: To ensure that bid protests are handled appropriately and in alignment with organizational standards, the following criteria must be satisfied:

- Receipt of a written protest (via email or hard copy) from a bidder or other interested party concerning a procurement event, such as contract award, bid opening, responsiveness, or responsibility of a bidder.
- Allegations that procurement rules, evaluation criteria, or organizational policies have not been properly followed.
- Claims that decisions related to the procurement process have adversely affected the interests of a bidder or the fairness of the competition.

5.2 Guideline

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
1	Bid Protester	<p>Submit Protest: The protester must submit a written protest to the Procurement Office by:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Email to the official procurement email address listed in the solicitation. <input type="checkbox"/> Hand delivery or certified mail to the Procurement Office address stated in the solicitation. <p>Oral protests are not accepted and will not be considered.</p>
2	Procurement Staff	<p>Intake:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Immediately record and timestamp the protest. Log all relevant details and assign a reviewer.
3	Procurement Director or Designee (Procurement Staff)	<p>Preliminary Screening:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Assess the timeliness, subject matter, and completeness of the protest. <input type="checkbox"/> Reject if untimely or invalid. <input type="checkbox"/> Request clarification if incomplete.
4	Procurement Director	<ul style="list-style-type: none"> <input type="checkbox"/> Determine whether the protest warrants a merits review or may be resolved without further review.
Note	Procurement	Threshold determinations may be decided by the Procurement Director or designee without convening a Protest Review Committee, provided the basis for the decision is documented in writing.
5	Procurement Director or Designee (Procurement Staff)	<p>Merits Review Determination:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Determine whether the protest warrants a merits review. <input type="checkbox"/> Decide whether to appoint a Protest Review Committee or resolve the protest administratively. <input type="checkbox"/> Document the basis for the determination
6	Procurement Director or Designee (Procurement Staff)	<p>Acknowledgment:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Confirm receipt of a valid protest with a reference number and outline next steps within three business days.
7	7a. Protest Review Committee 7b. Procurement Director	<p>Investigation & Evaluation:</p> <p>a. Protest Review Committee (if appointed)</p> <ul style="list-style-type: none"> <input type="checkbox"/> Conduct independent review of the protest <input type="checkbox"/> Evaluate procurement records and compliance

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
		<input type="checkbox"/> Prepare written findings and recommendations b. Administrative Review (if no committee) <ul style="list-style-type: none"> <input type="checkbox"/> Review the protest based on the record <input type="checkbox"/> Prepare written determination <input type="checkbox"/> Forward decision for Executive Director approval
8	Protest Review Committee	<input type="checkbox"/> Perform steps as outlined in Section 1.1 of the Appendix.
9	Procurement Director	Decision: <ul style="list-style-type: none"> <input type="checkbox"/> Draft the written decision letter based on the administrative record and, if applicable, the Protest Review Committee's findings and recommendations. <input type="checkbox"/> Submit the decision to the Executive Director for review and approval. <input type="checkbox"/> Issue the final, approved decision to the protestor. <input type="checkbox"/> Issue the final decision to the protestor.
10	Procurement Director	Post-Decision Actions: <ul style="list-style-type: none"> <input type="checkbox"/> If the protest is sustained, coordinate and implement approved corrective actions in accordance with the Executive Director's decision. <input type="checkbox"/> Notify affected internal stakeholders and bidders, as required. <input type="checkbox"/> If the protest is denied, formally close the protest. <input type="checkbox"/> Ensure all protest records are finalized, archived, and retained in accordance with record retention requirements.
11	Procurement	Recordkeeping & Reporting: <ul style="list-style-type: none"> <input type="checkbox"/> Maintain comprehensive records for at least seven years and report on protests quarterly to monitor trends and ensure transparency.
Guideline Ends:		When the Executive Director approves the final written protest decision, the protestor receives it, corrective actions are completed, and the file is archived per record requirements, all conditions are met.

Appendices

1.0 Workflow

1.1 Protest Investigation and Evaluation Checklist

Protest Review Committee Checklist			
Completed		Steps	Notes
Yes	No		
		1. Review the protest submission and all supporting documentation.	
		2. Obtain and review the solicitation, bids or proposals, evaluation records, scoring sheets, and award determination.	
		3. Assess compliance with applicable procurement laws, regulations, solicitation requirements, and internal policies.	
		4. Determine whether any alleged error or irregularity occurred.	
		5. Evaluate whether the protester was materially prejudiced by the alleged error.	
		6. Deliberate independently and without influence from procurement or evaluation staff involved in the protested procurement.	
		7. Prepare a written report summarizing findings of fact, conclusions, and recommended disposition of the protest (sustain, deny, or partially sustain).	
		8. Return to guideline, Step 9.	

2.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> None	<input type="checkbox"/>

3.0 Internal and External References

3.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	RS0-OP-002, Record Retention Policy	Sets rules for managing, retaining, and disposing of records to ensure compliance and secure removal of outdated materials.	

3.2 External References

Item Number	Reference	Purpose	Link
1	None		

4.0 Glossary of Terms

4.1 Abbreviations and Acronyms

- SOG.** Standard Operating Guideline

4.2 Definitions


- Standard Operating Guideline.** A written guide that ensures consistent, high-quality, and compliant execution of routine tasks while minimizing errors and miscommunication.



Procurement

How to File an Appeal

STANDARD OPERATING GUIDELINE

Guideline Number:	PR0-SOG-002
Effective Date:	Feb 23, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 3/2/2026
	Eugene Jones, Jr. Executive Director VIHFA Date

Version Control Table

MOC Number	Version Number	Date Revised	Description
010724-001	1.0	-	Original Document

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1.0 Version Control

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Substantive changes within this document that reflect a policy change will result in the issuance of a new version with an increase in the primary version number (2.0, 3.0...). Future policy changes will result in additional revision and the issuance of a new primary version number.

Non-substantive changes such as minor wording and editing, or clarification of existing policy that do not affect the interpretation or applicability of the policy will be included in minor version updates denoted by a sequential number increase behind the primary version number. Such changes would result in version numbers such as 1.1, 1.2...

2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

The standard operating guideline (SOG) outlines administrative processes as specific tasks, detailed in the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Responsible Party.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Guideline Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Contractor.** Initiates the appeal by submitting a written request within five business days of receiving the decision notice from VIHFA.
- Executive Director.** Reviews the compiled appeal file and all supporting documentation. Issues a final written decision, providing detailed analysis and the Authority's determination.
- Procurement.** Supports the process of appeal intake, documentation, scheduling, and recordkeeping. Ensures compliance with Authority procedures and policies throughout the appeal process.

- **Procurement Director.** Receives and records contractor appeals, checks deadlines, sends acknowledgments, organizes meetings and keeps records, forwards files for review, and communicates final decisions.

5.0 Specific Guidelines

The purpose of the appeal procedure is to provide contractors with a formal avenue to challenge, question, or seek reconsideration of decisions or actions taken by VIHFA in relation to their contracts. This process ensures transparency, fairness, and accountability in resolving disputes or disagreements arising from contract administration.

5.1 Requirements

Objective: To ensure a fair and transparent appeals process, the following objectives guide the Virgin Islands Housing Finance Authority’s approach to contractor disputes:

- Establish a clear, systematic method for contractors to present grievances or contest Authority decisions.
- Facilitate impartial review of contested decisions by designated Authority officials.
- Ensure all appeals are handled promptly, documented meticulously, and resolved in accordance with Authority policies and timelines.
- Maintain the integrity and consistency of contract management within VIHFA.

Criteria: Appeal procedures are activated when any of the following occur:

- A contractor receives an official notice of a decision or action from VIHFA that adversely affects their contractual rights or obligations.
- The contractor believes the decision or action taken by VIHFA is unjust, incorrect, or not in accordance with contractual terms.
- The contractor wishes to contest, clarify, or seek amendment to a specific aspect of the Authority’s decision regarding their contract.
- Supporting documentation or legitimate grounds for appeal are available to substantiate the contractor’s grievance.

5.2 Guideline

Trigger:		At least one criterion of §6.1 listed above must be met.
Step Number	Responsible Party	Task
1	Contractor	Filing the Appeal <ul style="list-style-type: none"> □ Submit a written appeal within five business days of receiving VIHFA’s decision notice. <ul style="list-style-type: none"> ○ Include contractor’s name, contract number, contact information, clear identification of the decision being appealed, grounds for appeal, and supporting documentation.

		<ul style="list-style-type: none"> ○ Submit the appeal to the Director of Procurement and Contracts by: <ul style="list-style-type: none"> - Email: procurements@vihfa.gov - Mail to: <ul style="list-style-type: none"> 3202 Demarara Plaza Frenchtown Plaza, Suite 200 St Thomas, VI 00802 ○ Failure to submit the appeal within the required timeframe shall result in dismissal of the appeal as untimely, unless good cause is determined by the Executive Director.
2	Procurement Director	<p>Intake and Acknowledgment</p> <ul style="list-style-type: none"> <input type="checkbox"/> Log the appeal <input type="checkbox"/> Confirm its timeliness <input type="checkbox"/> Review jurisdiction to ensure the matter qualifies as a contract administration appeal <input type="checkbox"/> A written acknowledgment shall be issued within three business days.
Note	Procurement	If the appeal concerns a procurement award matter, it shall be dismissed and redirected to the Bid Protest procedure, subject to applicable filing deadlines.
3	Procurement Director	<p>Scheduling and Conducting Conference (if requested)</p> <ul style="list-style-type: none"> <input type="checkbox"/> If a conference is requested, it is scheduled within 10 business days. <input type="checkbox"/> Both parties present their case. <input type="checkbox"/> Minutes are recorded.
Note	Procurement	Failure of the contractor to appear may result in dismissal of the appeal.
4	Procurement Director	<p>Review and Decision</p> <ul style="list-style-type: none"> <input type="checkbox"/> Compile the complete appeal file, including: <ul style="list-style-type: none"> ○ Original decision notice ○ Appeal submission ○ Relevant contract provisions ○ Supporting documentation ○ Conference minutes (if applicable) <input type="checkbox"/> The file shall then be forwarded to the Executive Director for review.
5	Executive Director	<p>Decision</p> <ul style="list-style-type: none"> <input type="checkbox"/> The Executive Director shall review the appeal file and determine whether the original decision was: <ul style="list-style-type: none"> ○ Consistent with contract terms ○ Supported by documentation

		<ul style="list-style-type: none"> ○ Reasonable and not arbitrary or capricious □ A written Final Decision shall be issued within 15 business days of receipt of the complete appeal file.
Note	Procurement	The Executive Director’s decision shall constitute the Authority’s final administrative action.
6	Procurement Director	<p>Communication</p> <ul style="list-style-type: none"> □ The decision is communicated to the contractor and filed for recordkeeping.
Note	Procurement	Pending resolution of the appeal, contract performance shall continue unless the Executive Director determines that a temporary suspension is in the best interest of the Authority.
Note	Procurement	<p>Recordkeeping and Compliance</p> <ul style="list-style-type: none"> □ All correspondence and records are retained for at least seven years.
Note	Procurement	Failure to comply with procedure may result in dismissal of the appeal and affirmation of the original decision.
Guideline Ends:		When the Executive Director’s decision is communicated in writing to the contractor and the complete appeal file is archived.

Appendices

1.0 Forms and Templates to Be Used

Form	Link
<input type="checkbox"/> Appeal Submission (Contractor)	<input type="checkbox"/>
<input type="checkbox"/> Appeal Acknowledgement Letter	<input type="checkbox"/>
<input type="checkbox"/> Conference Notice and Minutes Template	<input type="checkbox"/>

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations	
2	RS0-OP-002, Record Retention Policy	Sets guidelines that governs how VIHFA manages its records throughout their lifecycle.	

2.2 External References

Item Number	Reference	Purpose	Link
1	2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance: Sections 200.317–200.320, 200.334)	Provides the foundational rules for managing federal grants and cooperative agreements.	eCFR :: 2 CFR Part 200 -- Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
2	7460.8 REV 2, HUD Procurement Handbook	Provides comprehensive guidance on procurement standards and procedures for Public Housing Agencies (PHAs).	Procurement Handbook for Public Housing Agencies (7460.8 rev-2) HUD.gov / U.S. Department of Housing and Urban Development (HUD)
3	Virgin Islands Code Title 31, Procurement Law	Establishes a standardized, transparent, and competitive framework for acquiring goods and services for the	Procurement - Virgin Islands Department of Property and Procurement

Item Number	Reference	Purpose	Link
		executive branch of the Government of the U.S. Virgin Islands (GVI).	

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- SOG.** Standard Operating Guideline

3.2 Definitions

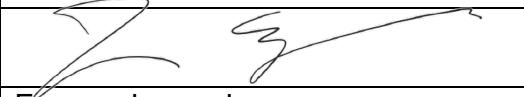
- Appeal.** Formal request for reconsideration of VIHFA decision.
- Appellant.** Contractor filing the appeal.
- Decision Notice.** Written communication from VIHFA that triggers appeal rights.
- Final Decision.** Written determination issued by Executive Director.
- Standard Operating Guideline.** A written guide that ensures consistent, high-quality, and compliant execution of routine tasks while minimizing errors and miscommunication.



Procurement

How to Ensure Compliant Procurement by Subrecipient

STANDARD OPERATING GUIDELINE

Guideline Number:	PR0-SOG-003
Effective Date:	Feb 23, 2026
Version Number:	1.0
Revision Date:	Original Document
Approved by:	 Eugene Jones, Jr. Executive Director VIHFA
	<u>3/2/2026</u> Date

Version Control Table

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2.0 Procedure Reviews and Modifications

Procedure reviews and modifications for a program are managed through a structured change control process. When clarifications, additions, or deletions are required to refine program rules, or when changes are necessitated by HUD requirements, federal and local regulations, or organizational updates, VIHFA personnel must submit a Change Request Form for evaluation. The executive leadership team member responsible for the requesting department will review and authorize the proposed changes according to their signatory privileges.

3.0 Scope

The standard operating guideline (SOG) outlines administrative processes as specific tasks, detailed in the following subsections:

- Objective.** A concise statement that defines the purpose of the administrative process. Objectives may be further stratified into smaller distinct subobjectives.
- Criteria.** The standard on which a judgement or decision is based.
- Trigger.** A condition that initiates activities to perform.
- Responsible Party.** A list of the agents responsible and the tasks the agents will complete to address the triggers.
- Guideline Ends.** An indicator that the objective is completed.

4.0 Responsibilities

- Compliance.** Reviews and approves subrecipient procurement policies, oversees adherence through monitoring and site visits, and prescribes corrective actions when necessary.
- Procurement.** Reviews and approves subrecipient documents, ensures compliance, and responds to non-compliance with corrective actions or penalties.
- Subrecipient.** Submits procurement policies for capacity assessment, provides documentation for review, seeks approval for contract changes, and maintains records for monitoring and accountability.

5.0 Specific Guidelines

The purpose of subrecipient procurement oversight is to ensure that all subrecipients of VIHFA-administered federal funds conduct procurement activities in accordance with VIHFA's policies, the Uniform Guidance (2 CFR 200.318–200.327), and relevant federal and territorial laws. This oversight safeguards program integrity, promotes fair competition, and prevents misuse of federal resources.

5.1 Requirements

Objective: To promote robust compliance, accountability, and standardized procurement practices, subrecipients receiving federal funds administered by VIHFA are required to adhere to the following protocols throughout all phases of procurement:

- Implement and follow VIHFA's Procurement Policy and Procedures (PR0-GP-001) for any procurement supported fully or partially by federal funds, unless an alternative has been explicitly approved in writing by VIHFA after a documented capacity assessment.
- Subrecipients wishing to utilize their own procurement policies and procedures must submit these documents for review. Such policies must meet or exceed the standards set forth in 2 CFR 200.318–200.327, applicable federal regulations, and territorial law. Written authorization from VIHFA Compliance and Procurement is mandatory prior to adoption.
- Provide complete and accurate documentation of every procurement action for review and obtain written approval before executing any contract.
- Maintain regulatory compliance at each stage of the procurement process, encompassing solicitation, evaluation, award, contract administration, and subsequent modifications.
- Prepare and properly document independent cost estimates, conduct cost or price analyses, ensure contractor responsibility, and perform suspension/debarment verifications as required.
- Preserve precise and comprehensive procurement records for the designated retention period to facilitate monitoring, audits, and overall accountability.
- Subrecipients are advised that noncompliance with authorized procurement procedures may result in corrective actions, disallowance of costs, suspension of reimbursements, withdrawal of procurement authority, or termination of the subrecipient agreement.

Criteria: The following events trigger subrecipient procurement oversight and review by VIHFA:

- Onboarding of a new subrecipient receiving federal funds administered by VIHFA.
- Submission of a procurement package for review and written approval prior to contract execution.
- Submission of any proposed contract modification, amendment, or change order.

- Contract modifications that:
 - Exceed twenty-five percent (25%) of the original contract value.
 - Cause the cumulative contract value to exceed \$250,000.
 - Materially alter the scope of work.
- Identification of deficiencies, non-compliance, questioned costs, or repeat violations during monitoring, audits, or desk reviews.
- Designation of a subrecipient as moderate or high risk based on prior performance, audit findings, or capacity concerns.
- Receipt of complaints, allegations, or indications of procurement irregularities.
- Scheduled or risk-based monitoring activities conducted by VIHFA.

5.2 Guideline

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
1a	Subrecipient	<p>Capacity Assessment:</p> <p>Upon onboarding and prior to conducting any procurement activity using federal funds, the Subrecipient shall:</p> <ul style="list-style-type: none"> □ Formally adopt VIHFA’s PR0-GP-001, Procurement Policy and Procedures □ Submit its own written procurement policies and procedures to VIHFA for review and written approval. <p>If the Subrecipient elects to use its own procurement procedures, no procurement activity may proceed until written approval is issued by VIHFA.</p>
1b	Compliance (with Procurement Support)	<p>If a Subrecipient submits its own procurement policies for approval, VIHFA shall:</p> <ul style="list-style-type: none"> □ Review the policies for compliance with 2 CFR 200.318–200.327, applicable federal regulations, territorial law, and VIHFA standards. □ Assess internal controls, conflict of interest provisions, cost/price analysis requirements, documentation standards, suspension/debarment verification procedures, and record retention practices. □ Issue a written determination within ten (10) business days of receipt of a complete submission, designating the policies as: <ul style="list-style-type: none"> ○ Approved

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
		<ul style="list-style-type: none"> ○ Approved with Conditions (Corrective Action Required) ○ Not Approved <p>If the Subrecipient's policies are determined to be insufficient or non-compliant, the Subrecipient shall be required to adopt and utilize VIHFA's Procurement Policy and Procedures as a condition of funding.</p> <p>Written determination shall be retained in the official Subrecipient oversight file.</p>
2a	Subrecipient	<p>Pre-Solicitation Review (when required): When required by VIHFA based on risk designation, funding source requirements, contract complexity, or prior findings, the Subrecipient shall submit the draft solicitation package to VIHFA Procurement prior to public release.</p> <p>Submission shall include, at minimum:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Draft solicitation (IFB, RFP, RFQ, etc.) <input type="checkbox"/> Draft scope of work <input type="checkbox"/> Independent Cost Estimate (ICE) <input type="checkbox"/> Proposed evaluation criteria <input type="checkbox"/> Proposed contract terms <input type="checkbox"/> Federal provisions to be included <p>No solicitation shall be publicly issued until written clearance is provided when pre-solicitation review is required. VIHFA may require mandatory pre-solicitation review for subrecipients designated as moderate or high risk.</p>
2b	Procurement (with Compliance support as needed)	<p>VIHFA shall review the draft solicitation for:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Proper procurement method selection <input type="checkbox"/> Scope clarity and non-restrictive specifications <input type="checkbox"/> Threshold compliance <input type="checkbox"/> Required federal clauses <input type="checkbox"/> Evaluation criteria alignment

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
		<ul style="list-style-type: none"> <input type="checkbox"/> Cost estimate adequacy <input type="checkbox"/> Written comments or clearance shall be issued within 10 business days.
3	Subrecipient	<p>Pre-Award Procurement Package Submission (Mandatory):</p> <p>Prior to contract execution, the Subrecipient shall submit a complete procurement package to VIHFA Procurement for review and written approval.</p> <p>Required documentation includes:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Independent Cost Estimate (ICE) <input type="checkbox"/> Solicitation documentation and proof of advertisement (if applicable) <input type="checkbox"/> Bid tabulation or evaluation summary <input type="checkbox"/> Conflict of Interest disclosures <input type="checkbox"/> Cost or price analysis <input type="checkbox"/> Responsibility determination <input type="checkbox"/> SAM.gov verification <input type="checkbox"/> Proposed contract including required federal clauses <p>Incomplete submissions shall be returned without review.</p> <p>No contract may be executed without written approval.</p>
4	Procurement	<p>Procurement Review:</p> <p>Procurement shall review for:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Procurement method and threshold compliance <input type="checkbox"/> Full and open competition <input type="checkbox"/> Adequate cost/price analysis <input type="checkbox"/> Vendor eligibility and licensing <input type="checkbox"/> Federal clause inclusion <input type="checkbox"/> Section 3/MWBE compliance (if applicable) <input type="checkbox"/> Written approval or disapproval shall be issued within 10 business days of receipt of a complete package.

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
4	Subrecipient	<p>Change Orders and Amendments:</p> <ul style="list-style-type: none"> □ All contract modifications, amendments, or change orders must be submitted to VIHFA Procurement prior to execution. □ Submission must include: <ul style="list-style-type: none"> ○ Written justification ○ Updated cost or price analysis ○ Revised scope (if applicable) ○ Cumulative modification calculation □ Board approval may be required if a modification: <ul style="list-style-type: none"> ○ Exceeds 25% of the original contract value ○ Causes cumulative contract value to exceed \$250,000 ○ Materially alters the scope of work □ No modification may proceed without written approval.
5	Compliance (lead) with Procurement Support	<p>Monitoring & Oversight:</p> <ul style="list-style-type: none"> □ VIHFA shall conduct oversight through: <ul style="list-style-type: none"> ○ Risk-based desk reviews ○ On-site monitoring visits ○ Random file audits ○ Follow-up reviews for prior findings □ Monitoring shall verify: <ul style="list-style-type: none"> ○ Adherence to approved procurement procedures ○ Proper documentation ○ Record retention compliance ○ Contractor eligibility and SAM verification ○ Federal clause inclusion ○ Section 3/MWBE reporting compliance □ A written monitoring report shall be issued documenting findings, corrective actions, and required deadlines. □ Subrecipients designated as moderate or high risk may be subject to mandatory pre-solicitation review and increased monitoring frequency.

Trigger:		At least one criterion of §5.1 listed above must be met.
Step Number	Responsible Party	Task
6	Compliance (lead) with Procurement Support	<p>Non-Compliance Response:</p> <ul style="list-style-type: none"> □ If deficiencies are identified: <ul style="list-style-type: none"> ○ Written notice shall be issued. ○ Subrecipient must submit a Corrective Action Plan within 10 business days. □ Failure to resolve deficiencies may result in: <ul style="list-style-type: none"> ○ Cost disallowance ○ Reimbursement withholding ○ Suspension of procurement authority ○ Mandatory adoption of VIHFA procedures ○ Agreement termination ○ Referral to federal oversight agencies □ Repeated or material non-compliance may result in high-risk designation.
Note	Procurement	<ul style="list-style-type: none"> □ Subrecipients and VIHFA shall retain procurement records for a minimum of 10 years following final payment and closeout, or longer if required by federal regulation, audit resolution, or litigation hold. □ Records must be made available upon request for monitoring, audit, or federal review.
Guideline Ends:		When the procurement package or modification is formally approved or disapproved in writing, all required corrective actions have been completed and verified, and monitoring findings have been formally closed.

Appendices

1.0 Forms and Templates to Be Used

Form

Link

None

2.0 Internal and External References

2.1 Internal References

Item Number	Reference	Purpose	Link
1	PR0-GP-001, Procurement Manual	Offers comprehensive policies governing practices, procedures, and operations.	
2	RS0-OP-002, Records Retention Policy	Keeps records for required durations to meet legal, regulatory, and operational needs, ensure accountability, and support efficient information management.	

2.2 External References

Item Number	Reference	Purpose	Link
1	None		

3.0 Glossary of Terms

3.1 Abbreviations and Acronyms

- SOG.** Standard Operating Guideline

3.2 Definitions

- Capacity Assessment.** Evaluation of an organization's ability to effectively carry out activities.
- Change Order.** A formal modification to an original contract that alters the scope, cost, or timeline of the work.

- **Monitoring & Oversight.** A comprehensive and ongoing process used to ensure programs and processes are implemented effectively, efficiently, and in compliance with applicable laws and regulations.
- **Standard Operating Guideline.** A written guide that ensures consistent, high-quality, and compliant execution of routine tasks while minimizing errors and miscommunication.



Manual Ends