

October 19, 2020

MEMO: Procurement Policy Legal Opinion

The Federal Register Notice 85FR4681 published on January 27, 2020 included the U. S. Department of Housing and Urban Development’s allocation of \$96,741,000 in Community Development Block Grant – Disaster Recovery (CDBG-DR) funds to the State of Iowa. This allocation sited compliance with CDBG-DR requirements found in 83FR5844. One such requirement found in Section IV. A. 1. a. (2), states:

“Procurement. Each grantee must provide HUD its procurement process/standards for review, so HUD may evaluate the overall effect of the grantee’s procurement process/standards to determine that they uphold the principles of full and open competition and include an evaluation of the cost or price of the product or service. The grantee must also provide a legal opinion that it has proficient procurement policies and procedures.”

As such, in the development of the State’s Policy and Procedures Manual for the 2019 CDBG-DR allocation, the State prepared a comprehensive procurement policy, beginning on page 30 of the manual dated October 2020.

As Chief Legal Counsel for the Iowa Economic Development Authority, I confirm that I have reviewed the Procurement Policy and that it is my opinion that the policies and procedure for procurement are proficient (*sic*) for the requirements of this grant.

*Rita C. Grimm* (Electronically Signed 10/19/2020 at 4:24 p.m.)

Rita C. Grimm  
Chief Legal Council