

Guidance Response Document

Criteria 1: Establishment of a "Procurement Ethics" Policy

Question: For criteria 1, the evaluation speaks to a Procurement Ethics policy. We don't have a policy specifically for that, but we have a Vendor Code of Conduct and our Procurement By-law includes ethics related considerations. We also have an Employee Code of Conduct. Would that be considered an equivalent?

We also don't have a one document manual but we do have a suite of policies, procedures and guides internally available. I believe this would be an equivalent as well but wanted to confirm.

Answer: Generally speaking, I recommend that your narrative be comprehensive to frame up how your entity satisfies the criteria through the numerous documents you describe below. The narrative should include specific detail on how each document directly relates to ethics and satisfies the criteria requirement. I recommend including screen shots of each relevant document, highlighting the verbiage that specifically aligns with the ethics tie-in from your narrative.

Question: You replied previously that our narrative must clearly explain how the vendor code of conduct/relevant by-law sections satisfy the criteria. We noticed that the criteria mentions authority of the Director of Supply Chain Management. The VCC document governance is under the responsibility of the Supply Chain Management (SCM) division and references the Director of SCM for dispute resolution. It is a document owned by our team. Would that satisfy this requirement given that the Director of Supply Chain Management oversees all procurement related documents?

Answer: The criteria states that "there must be evidence that this policy was adopted by the Chief Procurement Official of the agency, at a minimum, not just posted, to receive points for this criterion." Therefore, the narrative would need to specifically confirm (if this is accurate) that the ethics policy was adopted by the Director of Supply Chain Management, to support the submittal requirements required for this criterion.

Criteria 3: Established a Procurement Staff "Professional Development" Program

Question: Can the training qualify for all staff, if taught by our Director to the procurement staff using a PowerPoint on Procurement related subject. i.e. a training on CFR 200 for Buyers and Contract Specialists taught by our Procurement Leadership in a conference room, if the PowerPoint was provided by our Governing agency, The Federal Transit Authority.

Answer: Internal training can satisfy Criteria #3, provided it is not pertaining to client/customer training. Please ensure that when documenting the training that it includes all documentation prescribed in the criteria.

Question: In our department, we have a professional, and she works in the Procurement Department, but she is not performing traditional procurement activities. She is more systems support. Is she required to submit the training like the other professionals that actually perform traditional procurement activities?

Answer: If you have a professional team member who does not perform traditional procurement activities, I recommend that you provide sufficient detail in your narrative to make that distinction clear to the evaluation team. I recommend that the narrative include specific details in terms of the actual functions she performs for which you feel renders her role to be considered outside of the professional procurement staff for the evaluation team's consideration.



Question: We have had a lot of turnover, so some staff members who worked in our department in 2024 are no longer here. Some in 2023 left half way through 2024. For the purpose of our application, do you want to see a list of our procurement staff members who were here in 2024 regardless of when they left? If they were not employed in 2024 (hired in 2025), do you still want to see them listed? Obviously, they would not have any list of training to show in 2024.

Answer: All professional staff should be listed with a clear delineation of when they were hired or departed your agency. This will support why there were no training allocations per staff member who were not employed for the entirety of a calendar year.

Criteria 5: Centralized procurement authority based in law (statute, ordinance, charter or adopted policy, if applicable):

Question: Our agency has a Procurement Bylaw that defines the requirements for our centralized procurements. In this bylaw, we include certain types of procurements that are decentralized but under the guidelines of Supply Chain Management. The criteria in the award notes that the Director can delegate authority to decentralize certain procurements. Our by-law does that for us, so we wanted to confirm that is also meeting the criteria.

Answer: The narrative should confirm that your agency operations under centralized procurement authority. The criteria specifically anticipates that the Chief Procurement Officer (CPO) will delegate a portion of their authority. Therefore, the narrative should articulate what specific portions of authority the CPO has delegated, rather than relying solely on what the bylaws allows to be delegated. Utilize the narrative to provide specifics to support satisfying the criteria requirements.

Criteria 6: Procurement Organizational Structure

Question: We plan to apply for the 2025 AEP Award. Our Purchasing Manager retired on 2/5/25. After his retirement we reorganized the Finance Division. As we fill out the application for the award this year, should we reference the organizational structure and responsible personnel that existed throughout 2024 through 2/5/25 or with the new personnel and structure as of 2/6/25?

Answer: The 2025 Achievement of Excellence in Procurement® Award Application, *Part III Criteria* states "all documentation requiring dates much fall within the established parameters to receive points". The 2025 application is silent to a specific timeframe associated with this criteria, so there is no strict directive guiding which organization structure you must use this year.

Question: Should we list only the current staff members who replaced the ones that left in 2024? Or do you want to see all the staff members who were in our department in 2024 as well? If you only want to see the current names, then some of the names may not match our criteria #3 submittal.

Answer: Recommend that your narrative identify the current date of the organization chart submitted for this specific criteria, so evaluators are informed that it may differ from other criteria, as a result of staffing changes that have occurred.

Question: Do you want us to include college interns in the organization chart as well or leave them out because they are not long-term staff?

Answer: It is not necessary to include college interns as they are not permanent members of staff.



Criteria 8b: Formal Procurement Card Program Audit/Review OR a staff member with a current CPCP (Certified Purchasing Card Professional) certification from the Institute of Commercial Payments (IOCP)

Question: In our school district, Finance is responsible for issuing and managing the overall usage of the P-cards (working closely with Purchasing when there are times our P-card must be used due to our higher limit). If we do a submission for section 8b that notes how Finance is primarily responsible (based on Finance's procedure's manual), will that be sufficient?

Answer: I am unable to give specific guidance on whether your program will satisfy the criteria requirements, as the AEP Evaluation Team will review the submittal and narrative against the criteria requirements to determine if it satisfies the submittal requirements. However, you are encouraged to provide as much specific narrative as necessary to support how each of the required submittal documents satisfies the specific requirements contained within the criteria. Presuming you are pursuing the program audit; the narrative should affirm that the audit was performed by a source outside of the card program administration. In this case, if Finance is responsible for issuing and managing the overall program, an independent body outside of Finance should conduct the audit.

Criteria 10: Professional Certification

Question: I wanted to confirm if the NIGP <u>PPA certification</u> will be considered on question 10.b.

Answer: The only certifications that satisfy the requirements for criteria 10 are specifically delineated in the application. NIGP's PPA designation is not included in the application listing, therefore, would not satisfy the criteria requirement.

Criteria 15a: Sustainable Procurement (formal sustainable procurement policy/program):

- Question: Our agency's Procurement Bylaw includes the overall commitment to sustainable procurement and supports procurement integrating equity, diversity, inclusion, moving forward toward Truth and Reconciliation, environmental, and social considerations in the Region's procurement solicitations
- An internal guide to green procurement has been created and posted on the agency's intranet site to help staff navigate sustainable procurement
- Our agency's commitment to the environment is part of its publicly made strategic plan and includes a corporate climate action plan with a goal to establish a green procurement policy
 - This includes an external page dedicated to the climate action
- Our agency has an internal procedure for inventory surplus and disposal which requires staff to consider the most environmentally conscious methods of disposal
- On September 19, 2019 our Council unanimously declared a Climate Emergency that included a resolution requesting the "development of corporate sustainability and climate change policies and a climate lens to be applied to the Regional infrastructure and operations." Since then, the application of a climate lens has evolved across the organization and actions were further defined in the Region's Corporate Climate Action Plan endorsed



by Council. The Corporate Climate Action Plan provides further direction under the Climate Lens pillar to "explore establishing Climate Considerations into all Council Reports". On January 22, 2025, in response to Report No. CA-01-25 re: "Corporate Climate Action Plan Progress Report," Staff were requested to report back on advancing this action as soon as possible.

- o These Council Reports are made publicly available
- Based on the above, our agency is committed to the development and implementation of sustainable procurement initiatives, including a green procurement policy, which we can show as part of the submission for criteria 15a. Can you confirm this would be applicable?

Answer: I am unable to give specific guidance on whether your program will satisfy the criteria requirements, as the AEP Evaluation Team will review the submittal and narrative against the criteria requirements to determine if it satisfies the submittal requirements. However, you are encouraged to provide as much specific narrative as necessary to support how each of the required submittal documents satisfies the three specific requirements contained within the criteria.

Criteria 11b: Education – A bachelor's degree or higher from an accredited university or college earned by at least 75% of the professional staff

Question: Do you want to see a list of only the current staff members or do we also show the names of all the staff members who were employed in 2024, but are no longer here?

Answer: The application does not specifically identify a timeframe that applies to this criteria. As such, listing current staff members is sufficient.

Disclaimer: Any guidance provided regarding the preparation of the Achievement of Excellence in Procurement (AEP) Award application is for informational purposes only and does not guarantee success. All applications are subject to a comprehensive review by the AEP Evaluation Team, who assess whether the submitted materials sufficiently demonstrate compliance with the criteria to achieve the associated points.