



August 14, 2025

Resolution No. SHFC-2025-25: To consider and take action to approve Procurement and Purchasing Standards.

WHEREAS, Strategic Housing Finance Corporation of Travis County (the “Corporation”) has been duly created and organized pursuant to and in accordance with the provisions of the Texas Housing Finance Corporations Act, as amended, Texas Local Government Code, Chapter 394 (the “Act”), for the purpose of providing a means of financing the costs of residential ownership and development that will provide decent, safe and sanitary housing for persons of low and moderate income at prices or rentals they can afford; and

WHEREAS, the Board of Directors of the Corporation (the “Board”) has reviewed and considered the “Procurement and Purchasing Standards” for the Corporation, a copy of which is attached to this Resolution as Exhibit A and incorporated herein for all purposes (the “Policy”); and

WHEREAS, the Board desires to adopt the Policy.

NOW THEREFORE, BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE STRATEGIC HOUSING FINANCE CORPORATION OF TRAVIS COUNTY, THAT:

Section 1: The Policy is hereby approved and adopted.

Section 3: This Resolution shall be in full force and effect from and upon its adoption.

PASSED AND APPROVED this 14th day of August, 2025.



Jan Wenig
President, Board of Directors

CERTIFICATION

The above resolution, adopted by the Board of Directors of the Strategic Housing Finance Corporation of Travis County at a meeting held on the 14th day of August, 2025, is hereby certified to be a true and correct copy of an official copy thereof on file among the official records of such Corporation.

WITNESS my hand this 14th day of August, 2025.

By: 
Dianna Grey
Executive Director and Secretary

EXHIBIT A

Procurement and Purchasing Standards



Procurement and Purchasing Standards

Introduction and Purpose

Strategic HFC is committed to responsible and transparent procurement and purchasing practices. The standards set forth in this document provide guidelines and procedures for buying goods and services, from vendor selection to the formal bidding process.

As a public nonprofit corporation in Travis County, Texas, Strategic HFC has established *Procurement and Purchasing Standards* in compliance with Texas Local Government Code, Chapter 394 – Housing Finance Corporations in Municipalities and Counties, and Texas Business Organizations Code, Chapter 22 – Nonprofit Corporations.

Additionally, the following standards are consistent with principles found in federal procurement standards (Uniform Administrative Requirements 2 CFR Part 200) as a framework of best practice, although not legally required unless and until Strategic HFC receives federal funding.

Texas Local Government Code Chapter 262 – Purchasing and Contracting Authority of Counties and other related procurement statutes and policies are not applicable to Strategic HFC's operations due to its status as a public nonprofit housing finance corporation, rather than a municipality, county or other political subdivision of the State.

By adhering to these Procurement and Purchasing Standards, Strategic HFC will uphold the principles of fairness, transparency, cost-effectiveness and accountability in all purchasing activities. These standards serve as a guide for all staff members involved in procurement and/or purchasing, ensuring compliance with legal and ethical standards. Regular review and updates to these standards will incorporate changing needs and best practices in the field of procurement.

Authorization for Use of Funds

1.1. Prior to the start of the fiscal year (January 1st), the Strategic HFC Board of Directors approves the annual Operating Budget. Staff are authorized to make purchases under the following conditions:

- Funding is available in the approved Operating Budget
- Expenses reasonably correspond to programs and purposes in the approved Operating Budget
- Expenses are identifiable, reasonable, justifiable and documented
- Purchases will not result in unnecessary or duplicative items

1.2. Funds corresponding to budgets other than Strategic HFC's annual Operating Budget (such as Board designated funds, special grants, special programs, etc.) may be subject to additional or different procurement and purchasing requirements. Unless otherwise stated, the standards within this document apply.

1.3. Per *Resolution SHFC-2024-56*, the Board of Directors has delegated authority to the Executive Director to obligate the organization for amounts of up to \$76,000 annually without requiring additional approval by the Board of Directors. This authority extends to all purchases made on behalf of the corporation. The authorized threshold may change during the annual budget process and/or by resolution passed by the Board of Directors. Any updates to the Executive Director's delegated authority threshold will be utilized by this policy when considering purchasing ranges.

1.5. Any employee who engages in unauthorized purchases may be subject to disciplinary action and/or restriction of purchasing authority.

Ethical Standards

2.1. All procurement and purchasing activities will be conducted with integrity, honesty, and fairness, avoiding conflicts of interest and improper practices. Staff involved in any procurement or purchases as a matter of corporation operations will adhere to the Strategic HFC Code of Conduct.

2.2. Employees involved in procurement shall not accept gifts, favors, or incentives from vendors that may compromise impartial decision-making. Specific guidance and details may be found in Strategic HFC's Code of Conduct.

2.3. Any actual or potential conflicts of interest involving employees, board members, or their immediate family members must be disclosed and appropriately addressed (see Conflict of Interest Policy and annual disclosure form).

2.4 All financial transactions are representative of Strategic HFC's commitment to accountability, transparency and furthering public benefit to the community. Procedures for spotlighting and addressing concerns related to purchasing and procurement fall under Strategic HFC's Whistleblower Policy.

Vendor Selection

3.1. Vendor selection is based on objective criteria such as quality, price, delivery capability, sustainability and compliance with relevant laws and regulations.

3.2. All vendors are treated fairly and without discrimination or bias based on race, gender, nationality, religion, or any other protected characteristic.

Procurement Methods

4.1. For routine purchases of goods and services up to \$15,000, a single, informal price quote over the telephone, fax, email, internet, etc. is acceptable. Such purchase transactions may occur using a purchasing Card, invoice payment through Strategic HFC's accounts payable system using Bill.com, check payment, ACH or electronic payment, or wire transfer if necessary. Estimates or purchase orders in advance of the transaction are preferred and invoices or other proof of charge and payment are considered necessary.

4.2. For purchases of goods and services (both one-time purchases and anticipated recurring purchases) annually totaling between \$15,000.01 and \$76,000, staff will obtain at least two comparative quotes or bids comporting with project or purchase specifications to ensure cost-effectiveness is standard practice. Approval by the Executive Director is required. Estimates or purchase orders in advance of the transaction are preferred and invoices or other proof of charge and payment are considered necessary.

4.3. Contracts or purchases over \$76,000.01 up to \$250,000 must be solicited via formal written quotes (as described in Section 4.2) or a written competitive bidding or proposal process, at the Executive Director's discretion.

4.4 Purchases or contracts of \$250,000.01 or more require a competitive bidding or proposal process. The formal solicitation will be conducted in a fair, open, and transparent manner, providing all eligible vendors with an equal opportunity to participate. Written documentation of the bid/proposal is required.

4.5. Exemptions to the process(es) above may be made in cases of public emergency, sole-source suppliers, professional service providers, or for other reasons deemed in the best interest of the organization. Such exemptions must be documented and approved in advance by the Executive Director or Deputy Director.

4.6 These guidelines also apply to transactions where Strategic HFC selects the vendor or consultant, but payment is made through another party, such as legal costs paid by developer partners or real estate brokerage services.

Purchase Authorization and Delegation of Approval

5.1. All purchases must be authorized in advance by designated individuals with appropriate authority. Strategic HFC's Executive Director currently maintains sole purchasing authority for the organization.

The tables below indicate where and when this purchasing authority is delegated from the Executive Director to certain designees. This delegation may be modified at any time, at the discretion of the Executive Director.

Positions Granted Delegated Purchasing Approval	
ED = Executive Director	EC = Executive Coordinator
DD = Deputy Director	OA = Operations Assistant
DRE = Director of Real Estate	AHA = Affordable Housing Assistant
DFA = Director of Finance & Administration	
DPEA = Director of Planning & External Affairs	
Directors = includes ED, DD, DRE, DFA, DPEA	Admins = includes EC, OA, AHA

5.2. Price thresholds, delegated purchasing authority and required approvals are clearly defined in the table below, ensuring standardized review and oversight while maintaining efficiency.

5.3. Proper documentation including quotes, invoices, receipts, and evidence of goods delivered or services rendered will be maintained for each purchase to facilitate accountability and accurate record-keeping.

Purchasing Thresholds & Requirements

Amount	Delegated Purchase Authority	Method	Documentation	Expense Approval	Contract	Notes
Under \$5,000	Admins, Directors	Purchasing Card, Bill.com Payment, Check payment, ACH payment, electronic payment	Invoice and Quote(s), if any	Purchasing Card policy OR 1-level approval of payment by 1) Director	Optional	Strategic HFC staff purchase based on a single quote obtained informally by phone, internet, fax, email, etc. Approvals by Director may also be obtained informally – in person, via phone, or email.
\$5,000 to \$15,000	Directors	Purchasing Card, Bill.com Payment, Check payment, ACH payment, electronic payment	Invoice and Quote(s), if any	Purchasing Card Policy OR 2-level approval of payment by 1) Director 2) ED	Optional	Strategic HFC staff purchase based on at least one quote obtained informally by phone, internet, fax, email, etc. Directors may choose to delegate this purchase to Administrative staff, however in such cases their approvals should be written.
\$15,000.01 to \$76,000	ED, DD, DFA	Purchasing Card, Bill.com Payment, Check payment, ACH payment, electronic payment	Completed Specification or Scope and 2 quotes	2-level approval of payment by 1) Director 2) ED	Optional	Strategic HFC staff purchase based on specifications and comparison of 2 written quotes.

\$76,000.01 to \$250,000	Resolution by Board of Directors	Board Approved Contract (Optional Competitive Procurement)	Executed resolution, Specification form, and 2 quotes OR Executed resolution and Signed Exemption	3-level approval of payment by 1) Director 2) ED 3) Board Pres	Contract required	
\$250,000.01 or more	Resolution by Board of Directors	Board Approved Contract via Competitive Procurement	RFP or other Solicitation and Executed Resolution and Signed Contract OR Signed Exemption and Executed Resolution and Signed Contract	3-level approval of payment by 1) Director 2) ED 3) Board Pres	Contract required	

Contract Negotiation and Review

6.1. Contracts will clearly define the rights and obligations of both parties, including deliverables, timelines, payment terms, warranties, and dispute resolution mechanisms.

6.2. All contracts and purchase agreements will be reviewed by the Executive Director, Director of Real Estate, and/or Deputy Director before finalization.

6.3. Legal counsel may be involved in reviewing complex or high-value contracts to ensure compliance and mitigate risks.

Internal Compliance and Monitoring

7.1. These standards comply with all applicable laws, regulations, and ethical standards governing procurement and purchasing activities, as well as with Strategic HFC's Code of Conduct policies.

7.2. Regular internal audits and reviews will be conducted to assess compliance with these standards and identify areas for improvement.

7.3. Any violations of these standards should be reported through the organization's designated reporting channels, and appropriate disciplinary action will be taken.

Record-Keeping, Reporting and Records Retention

8.1. Accurate and comprehensive records of all procurement and purchasing transactions will be maintained, including documentation of vendor selection, bids received, contracts, purchase orders, invoices, and payment details. Records will be kept for time periods outlined in the Strategic HFC Record Management Guidelines.

8.2. Financial staff will provide reporting on procurement activities – including expenditure analysis, vendor performance, and compliance with policies and procedures – to the Executive Director and the Finance & Administration Committee of the Board of Directors upon request.

Policy Revisions

9.1 The Strategic HFC Treasurer will review this policy and recommend revisions to the Finance & Administration Committee of the Board of Directors, if necessary.