

# **CRHA PROCUREMENT POLICY – SUMMARY OF CHANGES**

(Comparing April 2020 Policy to November 2025 Policy)

## **1. PROFESSIONAL SERVICES THRESHOLD INCREASE**

- 2020: Threshold set at \$60,000.
- 2025: Increased to \$80,000 to match VPPA updates and federal best practices.

## **2. NEW AND EXPANDED DEFINITIONS**

- 2025 policy adds a comprehensive definitions section including: small business, Section 3 definitions, VOSB, SDVOSB, responsive/responsible bidder, QBS, RFP.
- 2020 had limited definitions.

## **3. PROCUREMENT METHODS**

- 2025 includes minor clarifying language for:
  - Micro-Purchases (3.3)
  - Blanket Purchase Agreements (3.5)
  - Legal Services Procurement (3.9)
  - Independent Cost Estimates / Price & Cost Analysis (3.11)
  - Cooperative Procurement (3.13)
  - Waiver of Informalities (3.14)
  - Federal vs. State Requirement Conflicts (3.15)

## **4. MICRO-PURCHASE THRESHOLD UPDATES**

- 2020: Micro-purchase threshold \$10,000.
- 2025: Fully defined micro-purchase procedures with alignment to updated 2 CFR 200 federal thresholds.
- Flexibility Added: Policy provides authorization for CRHA to adjust micro-purchase levels administratively as HUD or federal thresholds change.

## **5. SMALL PURCHASE THRESHOLD UPDATES**

- 2020: VPPA-aligned but static.
- 2025: Updated to \$250,000, include revised VPPA and federal SAT adjustments.
- Flexibility Added: CRHA may revise small purchase thresholds as federal SAT is updated under 2 CFR 200.

## **6. BABA AND FEDERAL COMPLIANCE UPDATES**

- 2020: References ARRA compliance only.
- 2025: Adds Build America, Buy America (BABA) compliance and robust 2 CFR 200 integration.

## **7. EXPANDED SMALL & DISADVANTAGED BUSINESS OUTREACH**

- 2025 policy includes:
  - Detailed definitions of disadvantaged business types, Veteran-Owned Business and Service-Disabled Veteran-Owned Business.
  - Required efforts under 2 CFR 200.321.
- 2020: Basic outreach text without detailed definitions.

## **8. AUTOMATIC THRESHOLD UPDATE FLEXIBILITY**

- 2025 policy includes highlighted language permitting CRHA to update:
  - Micro-purchase thresholds
  - Small purchase thresholds
  - Construction bonding and BABA requirements
  - SAT and federal procurement thresholdswithout requiring board-level policy rewrite.

This document consolidates all known changes from the April 2020 to November 2025 Procurement Policies.