

***U.S. Department of Housing & Urban Development
Biobased Purchasing Strategy***



On February 21, 2012, President Obama signed a Memorandum, Driving Innovation and Creating Jobs in Rural America through Biobased and Sustainable Product Procurement. The memorandum requires all federal agencies to undertake a number of activities to increase their purchase of biobased products.

The following information is submitted as Appendix C, Biobased Purchasing Strategy for the Department of Housing and Urban Development (HUD):

HUD is moving to implement the Presidential Memorandum requirements. The HUD Office of Chief Procurement Officer (OCPO) intends, in the coming months, through its Federal Procurement Data System (FPDS) Independent Validation and Verification (IV&V) reviews, to look at the Affirmative Procurement Plan (APP) compliance within HUD's acquisitions. The results of the Affirmative Procurement Plan review will be forwarded to the Office of Federal Procurement Policy along with the FPDS IV&V results.

HUD intends to establish its baseline for biobased contracting through its quarterly audits of green purchasing for the third and fourth quarters of FY 2012. Those audits will be completed by December 31, 2012. HUD designated an OCPO employee to monitor, report and publicize the requirements associated with green purchasing throughout HUD. Additionally, this employee conducts the quarterly audits to demonstrate 95% compliance with the sustainable acquisition goals.

HUD recognizes that the baseline should have been established earlier. However, the quarterly audits should put HUD in compliance by the end of the calendar year. To further identify non-compliance, HUD's OCPO Risk Management and Compliance Unit conducts quarterly assessments of acquisitions to ensure compliance with green purchasing requirements. This allows HUD to target training as necessary in efforts to mitigate the risk of non-compliance.

In terms of ensuring a knowledgeable workforce, HUD intends to improve compliance through centralizing, updating and maintaining its intranet Web pages on green purchasing to reflect all requirements listed in HUD's APP plan with various links to recycled content products, environmental preferable products, biobased products and energy conservation products and others. As a result of these efforts, HUD expects the acquisition workforce to be more educated and have the necessary at-hand resources to ensure total compliance.

Finally, HUD intends to partner with industry to facilitate compliance by issuing a flyer to contractors (and request they notify subcontractors,) who are potential users of biobased and other greening materials in performance of HUD contracts, that identifies the statutory and regulatory requirements.