

## **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.

## 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.

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## **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.

**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.

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