



**Town of Bristol**  
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## MEMORANDUM

*Procurement Policy V2.0, Compliance Update and Summary of Changes*

**To:** Bristol Selectboard  
**From:** Greg Faust, Town Administrator  
**Re:** Procurement Policy (SB-2026-02), V2.0 compliance review and recommended adoption  
**Companion document:** Bristol\_Procurement\_Policy\_SB-2026-02\_V2.0.docx

### Bottom line

Draft V2 was already a strong, well-structured policy. The review found one audit-critical problem: the federal procurement thresholds were out of date. The 2024 rewrite of 2 C.F.R. Part 200 stopped hard-coding dollar figures and instead pegs them to the Federal Acquisition Regulation (FAR), and the FAR amounts were then raised effective October 1, 2025. V2 still carried the old numbers. A Single Audit tests Town procurement against these federal standards, so stale thresholds are exactly the kind of gap an auditor cites. The attached V2.0 corrects this and states the federal thresholds by reference, so they stay current automatically the next time the FAR adjusts for inflation.

### Audit-critical corrections (federal thresholds)

Item	V2 (out of date)	V2.0 (corrected)
Federal micro-purchase	\$10,000	\$15,000 (self-cert up to \$50,000)
Simplified acquisition	\$250,000	\$350,000
Formal bid required above	\$250,000	Simplified acquisition threshold
Cost/price analysis trigger	Fixed \$250,000	Above simplified acq. threshold (200.324(a))

*Source: 2 C.F.R. §§200.1, 200.320, 200.324 (2024 revision, 89 FR 30136); FAR threshold inflation adjustment effective October 1, 2025.*

### Other compliance fixes

- **Required federal contract provisions (new §16.10).** V2 had no clause requiring the mandatory federal contract terms. Added a reference to 2 C.F.R. §200.327 and Appendix II (equal opportunity, Davis-Bacon, rights to inventions, Clean Air/Water Act, debarment, Byrd Anti-Lobbying, recovered materials, domestic preference). Missing required clauses are one of the most common federal procurement audit findings.
- **Code of Conduct strengthened (§14).** Now explicitly covers Selectboard members and requires on-the-record disclosure and recusal, matching 2 C.F.R. §200.318(c). Given the Town's recent conflict-of-interest history, this tightens the most-tested control.
- **Citation corrections.** Contractor-who-drafts-specs exclusion corrected to §200.319(b); time-and-materials limit moved to its correct cite §200.318(j) while the cost-plus prohibition stays at §200.324(c); domestic preference cited to §200.322; debarment to §200.214 and Part 180.
- **Affirmative outreach (§15.01).** Added labor surplus area firms to match §200.321.

## Five operational questions, resolved to recommended defaults

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V2 left five items open for your confirmation. I set each to a recommended default so the attached policy is adoption-ready. The Selectboard can change any of them before voting.

- **Q1, Town Administrator / minor-purchase ceiling: set to \$15,000.** Aligns the local delegation ceiling to the federal micro-purchase threshold, so staff remember one number. Tradeoff: the Selectboard reviews purchases only above \$15,000, but the \$2,000 monthly reporting floor (Q4) keeps everything above the no-approval level visible.
- **Q2, Professional services threshold: kept at \$25,000.** Reasonable headroom for routine legal and engineering work without Selectboard sign-off. Federal architectural/engineering work still uses qualifications-based selection regardless of dollar amount (§10.04).
- **Q3, Emergency documentation window: set to 48 hours.** 24 hours is unrealistic during an actual emergency (storm, water main break). 48 hours is still contemporaneous enough to satisfy auditors.
- **Q4, Monthly reporting floor: set to \$2,000.** Aligns with the incidental ceiling, so the Selectboard sees every purchase above the no-approval level. V2 had proposed \$2,500.
- **Q5, Credit Card Policy: §19 governs in the interim.** The Town's Credit Card Policy dates to 2014 and predates this revision. §19 controls where they conflict, with the more restrictive provision applying. Recommend revising the Credit Card Policy in parallel to align thresholds and approval steps.

## Why this protects the Town in an audit

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A Single Audit tests procurement against a defined checklist: current dollar thresholds, full and open competition, a documented conflict-of-interest standard, vendor debarment checks, required contract clauses, cost/price analysis, and three-year records retention. V2.0 now reflects the current version of every one of these elements and ties the moving numbers to the federal source so the policy does not silently go stale. That is the practical meaning of fidelity of compliance.

## Next Actions

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- **1.** Confirm or adjust the five defaults above (Q1 to Q5).
- **2.** Place V2.0 on a Selectboard agenda for adoption; it can be adopted alongside the Conflict of Interest Policy (SB-2026-01), which it cross-references.
- **3.** Schedule a parallel revision of the 2014 Credit Card Policy to align with §19.