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MEMORANDUM FOR RECORD

To: Londonderry Town Council

From: Shaun Mulholland, Town Manager

Date: 12/15/2025

Subject: Evaluation of Proposed Changes to the Town's Purchasing Framework and comparison with the draft ADM-110 Procurement Policy

I. Purpose of This Memorandum

The purpose of this memorandum is to provide an administrative analysis of the **proposal from Councilor Faber**, which would substantially alter the Town's purchasing structure, and to propose that the Town Council review the draft **Administrative Policy ADM-110** that is still not complete for comparison.

ADM-110 modernizes procurement practices, aligns administrative procedures with the Town Charter, strengthens transparency and accountability, and supports efficient service delivery. Conversely, the proposal from Councilor Faber shifts operational purchasing authority from the Town Manager to the Town Council, creates workflow bottlenecks, increases operational risk, and exceeds current staffing and software capacity.

II. Summary Recommendation

After careful review, I **do not recommend** adopting the proposal from Councilor Faber. Instead, I recommend that the Town Council take the time necessary to review the draft of ADM-110 which is in development. ADM-110:

- Conforms to the Town Charter's designation of the Town Manager as the principal contracting officer.
- Preserves proper separation of legislative and administrative functions.
- Strengthens procurement integrity, transparency, and audit compliance.
- Implements best-practice procurement standards consistent with state and federal requirements.

- Avoids political influence in purchasing decisions.

III. Administrative and Governance Concerns with the Proposal from Councilor Faber

1. Charter Conflicts and Governance Structure

The Charter (Art. 4, Sec. 4.6) assigns procurement authority to the Town Manager—not the Town Council. Shifting the approval of routine operational procurements to the Council undermines the Charter’s structure and creates legal ambiguities. ADM-110 is fully aligned with this Charter authority. The provisions of the Charter are as follows:

Section 4.6. Powers and Duties of the Manager

- A. The Manager shall be the chief administrative officer of the Town, shall supervise and be responsible for the administrative and financial affairs of the Town and shall carry out the policies enacted by the Council. The Manager shall be charged with the preservation of the health, safety and welfare of persons and property and shall see to the enforcement of the ordinances of the Town, this Charter and general State Laws governing administration of the Town. The Manager shall supervise and direct the administration of the Town departments and personnel therein.*
- C. The Manager shall fix the compensation of all town officers and employees appointed by the Manager with the limits established by existing appropriations.*
- D. The Manager shall have full jurisdiction over the rental and use of all Town facilities under the Manager’s control. The Manager shall be responsible for the maintenance and repair of all Town property under the Manager’s control, within the limits of existing appropriation.*
- F. The Manager shall be responsible for purchasing all supplies, material and equipment for all departments and activities of the Town.*
- H. The Manager shall set rules and regulations and establish a system of personnel administration known as the “Personnel Plan”. The Personnel Plan shall include provisions with regard to classification, compensation, selection, training, promotion, grievances, discipline, vacations, retirement and any other matters necessary to the maintenance of efficient service and proper working conditions.*
- J. The Manager shall be responsible for the collection, accounting deposit and periodic reporting of all town revenues and expenditures in a secure and business-like manner in accordance with generally accepted accounting practices and proper internal controls.*

2. Operational Inefficiencies and Delays

The proposal from Councilor Faber requires Council approval for a significant number of routine operational expenditures. This will:

- Delay critical and time-sensitive purchases.
- Increase administrative cycle times.
- Introduce avoidable interruptions in public safety, infrastructure, and general operations.

ADM-110 maintains procurement efficiency while ensuring robust oversight.

3. Excessive Administrative Burden

The proposal requires purchase orders (POs) for a wide range of transactions, including those already properly controlled through existing software, contracts, or policies. The volume would:

- **Exceed current staffing capacity** to prepare, review, and approve POs.
- **Overwhelm the Town's existing finance software**, which cannot efficiently process exponentially increased requisitions.

This would result in workflow breakdowns, processing backlogs, and reduced service quality.

4. Weakened Internal Controls and Risk Management

ADM-110 strengthens internal controls through detailed procedures for:

- Debarment and suspension,
- Vendor responsibility evaluation,
- Insurance and indemnification requirements,
- Federal grant compliance,
- Contract oversight.

The proposal from Councilor Faber does not include these modern controls and creates fragmented authority across multiple elected officials.

Councilor Faber's proposed policy shifts approval authority away from the Town Manager and vests that authority with specific department heads.

The policy does not define what third party consulting agreements for outside professional services are. It does provide some examples and then states "All management consulting and legal services"

5. Reduced Accountability

Under the Charter, the Town Manager is accountable for procurement outcomes. The proposal divides accountability across the Council, diluting responsibility and complicating corrective action processes. The policy provisions proposed by Councilor Faber is what is common in places that have a Board of Selectmen and a Town Administrator. The Town chose to change its form of government when it adopted the Town Council/Town Manager form of government with a Charter in 1996. Councilor Faber's proposed policy seems to follow a format that many school districts operate on with some notable differences. This format is not something that is found in Towns.

The proposed policy references acknowledgement of purchases by "the school or person receiving...". I suspect this was an error in the development of the proposed policy.

6. Statutory References

Councilor Faber's proposal references NH RSA 189:1-a which applies to School Districts not Towns.

IV. Practical Operational Capabilities & Capacity Constraints

1. Staffing Capacity for Purchase Orders

The Finance Department currently processes a manageable volume of purchase orders consistent with operational needs and risk thresholds. The proposal from Councilor Faber would:

- Increase PO volume by several hundred percent, based on current purchasing patterns.
- Require additional full-time administrative staff to handle creation, review, documentation, and internal audit trails.
- Divert administrative resources from strategic or statutory responsibilities.

The Town does not presently have staffing capacity to support this expansion without new appropriations.

2. Limitations of the Existing Financial Software

The current ERP/financial system:

- Is not designed to process a high-frequency PO environment.
- Would experience performance degradation, workflow delays, and data inconsistencies if required to handle dramatically increased requisition volumes.
- Would require either a major system upgrade, replacement, or significant reconfiguration—all of which carry substantial cost and time implications.

ADM-110 aligns with the system's capacity; the proposal from Councilor Faber does not.

3. Impacts on Service Delivery

Operational staff—including Police, Fire, Public Works, and Community Development—would experience longer procurement lead times, resulting in:

- Delays in replacement of essential equipment.
- Slower public safety response capability.
- Reduced ability to meet infrastructure maintenance schedules.
- Increased costs due to missed pricing windows or vendor delays.

ADM-110 supports timely delivery of services to residents; the proposal undermines it.

4. Conflicts with Articulated and Undefined Language in the Proposed Policy by Councilor Faber

- A.** Section B requires itemized credit card receipts. This is not possible for some credit card transactions such as use of credit cards for paying for parking. We presently require a memo from the Town employee or official to articulate the expenditure. The proposed policy by Councilor Faber does not allow for this or for lost receipts. There appears to be an error in the placement of a period after Finance Director in the last part of the paragraph for Section B.
- B.** Section C is unclear as to what it actually means.
- C.** The policy does not specify when a proposed purchase should be put out to bid, RFP or RFQ.
- D.** The proposal states the following, *"It shall be the responsibility of the Finance Director to request a budget transfer of funds to cover any order that may take a function line over-budget."* Who does the Finance Director seek approval from? The proposed policy also does not state how transfers can be conducted - for instance does the transfer need to be completed within the same department, can funds be taken from other departments to support another department's short fall. The idea of transferring the funds creates a bottleneck itself - identifying where the funds are to come from, obtaining approval (as stated from who), and then actually completing the transfer in the ERP.
- E.** The proposal allows the Town Manager and Finance Director to authorize expenditures from \$0-\$5,000 but not the Deputy Town Manager. But then it allows

the TM, FD and ATM to authorize purchases over \$5,000. Perhaps the intent was inverted.

F. The policy states the following,

"Purchases and projects involving expenditures more than the following dollar amounts and All consulting services shall be expected to comply with these practices:

All Third Party consulting agreements for outside professional services shall be presented to the Town Council for approval regardless of the amount. i.e: IT Services, Human Resources Services, All management consulting and legal services."

However, below that the following language is found,

Exception to Bidding or Written quotation Requirement:

- *Purchases made through collaborative purchasing groups*
- *Purchases of utilities, where competitive sources are not available, including current multi-year utility contracts for the Town.*
- *Purchases involving the acquisition of personal or professional services; including legal services for the Town. The Town Manager will maintain a yearly list of professional services for the Town where there is a limited number of available providers.*

This conflicts with other provisions of the policy in that the TM appears to only require a list and does not have to provide a purchase order to the Town Council for approval.

- *Purchases of proprietary maintenance contracts, where alternate "authorized" sources are not available.*
- *Renewal of current vendor service contracts where quality and timely performance is a critical requirement and where the Town Manager determines renewal is in the best interest of the Town of Londonderry.*

This would make the requirement that the Town Council approve subsequent contracts for third party vendors the Town is already doing business with.

- *Purchases involving minor repairs.*
- *Purchases involving major repairs where bidding or formal request for quotation (RFQ) requirements are waived by the Town Manager and the Finance Director due to the urgency of the repair.*
- *Purchases involving a documented sole source of supply or Town Council approved sole source vendors.*

Sole source vending should have detailed proposals with at least some reference to price. This policy negates that requirement. What is the difference between sole source of supply and Town Council approved sole source vendors?

- *Any additional purchases considered to be in the best interest of the Town and authorized by the Town Council.*
- *Expense reimbursement*

- *Specific software already approved and in use by the Town's Technology Department to perform the functions of the Town of Londonderry. The IT Director will maintain a yearly list.*
- *Services that are directly contracted with the Londonderry Schools.*
- *Professional Development specific to yearly Strategic Plan goals and initiatives. The Town Manager, Assistant Town Manager, Finance Director will maintain a yearly list.*

G. The proposed policy requires RFPs and bids to be issued from the Finance Director's Office. It is unclear which official is actually responsible for the issuance of these documents.

H. There is a blanket policy that all purchases over \$15,000 that are not on the exceptions list shall require Town Council approval.

I. The policy states the following,

"Town Council Budget approval shall not be considered approval of a specific purchase. The Purchasing Procedures Policy must still be followed."

What does this actually mean?

J. The policy states the following,

"All new and renewed proprietary maintenance contracts require Town Council approval following the same thresholds mentioned earlier in this policy."

"All new and renewed vendor service contracts require Town Council approval following the same thresholds mentioned earlier in this policy."

This appears to conflict with the language above in the policy and at the very least is confusing.

K. The policy states the following,

"Purchase orders are to be used in every possible instance. Blanket purchase orders may be issued to vendors where repeated purchases of incidental items take place. All blanket purchase orders must be approved by the Town Manager with Confirmation of the Town Council. The requirement for purchase orders may be waived by the Town Council." (underline added for emphasis by this writer)

The use of blanket purchase orders should be very limited and have further constraints. It is unclear what "incidental items" would be defined as. "Every possible instance" means basically every instance other than true emergencies.

L. The policy states the following,

PURCHASE ORDERS:

1. *Purchase orders are required for all individual purchases. Purchase orders must be requested and approved by the Town Manager prior to placement of an order.*

This is in direct contravention of what was stated earlier in the policy in that "Town Administrators" which is defined as the TM and specified department heads and "bear the electronic approval of the appropriate Administrator".

2. *Blanket purchase orders may be issued to vendors where repeated purchases of incidental items take place. If there is a price increase, then a new purchase order shall be required. All blanket purchase orders must be approved by the Town Manager.*

This appears to be in direct contravention of other provisions of the policy that require Town Council approval.

3. *The distribution of copies of the approved completed purchase order is as follows:*
 - a. *Original copy to vendor, where necessary.*

We do not have original copies of purchase orders. They are digital. This is language from a previous era.

4. *The following information must be included on the purchase order:*
 - a. *Date;*
 - b. *Amount of purchase, including an estimate for shipping, etc;*
 - c. *Vendor's name and address;*
 - d. *Quantity and description of item (s); and*
 - e. *Department and account to be charged*
5. *The Purchasing Agent may require further information regarding the purchase.*

Who is the Purchasing Agent for the purposes of this policy? It is not defined.

6. *Approved purchase orders shall either be returned to the department placing the order, or mailed directly to the vendor, as appropriate. Vendor order forms must accompany direct mail purchase orders where necessary.*

This speaks to a by-gone era. We don't return purchases orders to a department, they are stored in our ERP software. We would email them. Mailing them adds additional cost that is not necessary.

7. *Purchase orders that are not approved by the Town Manager or designee shall be returned to the department placing the order accompanied by a memorandum explaining why the purchase order was not approved.*

This language references a by-gone era. This information is contained within our ERP software. What are you proposing that we physically send back to the department?

M. The policy states as follows;

"Any individual who places an order without complying with the purchase order procedures shall be responsible for the payment of or return of the items received."

Under what statutory authority can the Town require employees or officials to be personally financially liable for payment of expenditures unless they are conducted in a way that would

violate the federal or state criminal laws? Under what mechanism would we collect these sums of money?

N. The policy states as follows;

“In the event of an emergency, the Town Manager or Assistant Town Manager shall have the authority to make such immediate purchases as deemed necessary”

The policy does not define what “In the event of an emergency” is or what circumstances this would constitute.

O. The policy states the following;

“All items not addressed in the new Policy/ amendment will remain in place until updated by the Londonderry Town Council.”

This creates conflicts with other existing policies as a result of the enactment of this policy.

V. Side-by-Side Comparison: ADM-110 vs. Proposal From Councilor Faber

Category	ADM-110 (Recommended)	Proposal from Councilor Faber
Charter Alignment	Fully aligned with Art. 4, Sec. 4.6— Town Manager as principal contracting officer.	Shifts contracting authority to Council, conflicting with Charter intent.
Operational Authority	Centralized administrative responsibility ensures efficiency and accountability.	Divides authority between Manager and Council, reducing operational clarity.
Approval Thresholds	Modern, scalable thresholds: up to \$10k verbal quotes; \$10k–\$50k written; >\$50k formal bidding.	Council approval required for many routine transactions; creates bottlenecks.
Use of Purchase Orders	PO requirements balanced to risk and operational practicality.	Dramatically increases PO requirements, exceeding staff and system capacity.
Finance Software Compatibility	Compatible with current ERP capabilities.	ERP cannot practically support the workload expansion required.

Category	ADM-110 (Recommended)	Proposal from Councilor Faber
Procurement Best Practices	Integrates modern RFB/RFP/RFQ, value-based evaluation, lifecycle costing, cooperative purchasing.	Limited procedural depth; omits key best-practice tools.
Risk Management	Includes debarment, suspension, insurance standards, federal compliance.	Lacks modern risk controls and vendor responsibility mechanisms.
Transparency & Auditability	Consistent documentation, competitive processes, detailed standards.	Fragmented or inconsistent processes weaken audit trails.
Council Role	Policy-level oversight, budget adoption, and major capital authorization remain intact.	Requires Council to approve operational transactions, contrary to governance roles.
Departmental Efficiency	Supports timely decision-making and service delivery.	Introduces delays in public safety, infrastructure, and general operations.

More Detailed-Level Comparison

Topic	Current Policy (PDF)	Draft A – ADM-110 Procurement Policy	Faber Draft B – 2025 Purchasing Procedures
Document Type / Intent	Standalone <i>Purchasing Policy</i> embedded in Municipal Code, covering purchasing, competitive selection, property disposition & ethics.	Full <i>Procurement Policy</i> with detailed administration, methods of source selection, thresholds, waivers, debarment, etc. Reads like a modern, comprehensive procurement code.	<i>Procedures</i> focused on how purchases are initiated, approved, and bid. Explicitly says it supersedes the existing Municipal Code purchasing chapter where addressed.
Authority & Purpose	Authorized under Charter Article 4, §4.6. Purpose is fair treatment, max value of funds, and cost-effective purchasing; also applies to disposal of supplies.	Same Charter authority, similar purpose language but modernized and broadened (adds life-cycle costs, risk, vendor definitions, etc.). Does not address property disposition directly.	Focused on fiscal management, audit trail, and compliance with Town policy, GAAP, and DRA rules. No explicit Charter citation; assumes policy layer exists above it.
Scope	Applies to expenditure of public funds and disposal of Town supplies.	Applies to all expenditures of public funds for procurement activities, regardless of	Applies to procurement of supplies, equipment, and services and to how funds are authorized,

Topic	Current Policy (PDF)	Draft A – ADM-110 Procurement Policy	Faber Draft B – 2025 Purchasing Procedures
Purchasing Agent / Roles	Explicitly designates Director of Finance & Administration as Purchasing Agent, with authority to purchase, dispose of property, coordinate departments, etc.	Formally identifies Director of Finance & Administration as Purchasing Agent and defines roles for Town Manager and Department Heads (including use of credit cards < \$10,000).	Defines “Town Administrator” group (TM, Asst TM, Finance Director, Police Chief, Fire Chief, PW Director) with approval roles. Uses “Purchasing Agent” in PO section but doesn’t re-define the role in this document.
Who Approves What (General)	- Purchase orders > \$5,000 require Town Manager signature. - Purchases under \$100,000 that are budgeted & don’t need transfers require TM approval. - Purchases > \$25,000 that are not budgeted & need transfers, and all purchases > \$100,000, require Town Council vote.	- Town Manager approves purchase agreements ≥ \$10,000 . - Department Heads can authorize staff to make credit card purchases < \$10,000 if within policy.	- Uses very centralized approvals : - \$0–\$5,000: Town Manager and Finance Director. - \$5,000 & above: Town Manager or Assistant TM and Finance Director. - Council approves all multi-year contracts and all third-party consulting agreements, regardless of amount.
Spending / Bidding Thresholds	- \$0–\$2,500: routine; no formal quotes. - \$2,500–\$5,000: 3 verbal quotes. - \$5,001–\$10,000: 3 written quotes. - > \$10,000: formal competitive selection process (advertised).	- Up to \$2,500: departmental discretion; no formal quotes. - \$2,501–\$10,000: 3 verbal quotes, documented. - \$10,001–\$50,000: 3 written or documented oral quotes. - > \$50,000: formal competitive bidding (RFP/RFQ) . Also has a threshold table that treats ≥ \$50,000 (and infrastructure > \$100,000) as “formal procurement actions” with RFB/RFP/RFQ.	- \$0–\$5,000: “Best interest of the Town” (no quote requirement written in). - \$5,001–\$15,000: at least 3 written quotes when available; if not, document why. - \$15,001 and above: at least 3 written quotes in line with Town bidding requirements, plus Council approval for engineering, construction, capital > \$15,000.

Topic	Current Policy (PDF)	Draft A – ADM-110 Procurement Policy	Faber Draft B – 2025 Purchasing Procedures
Purchase Order Requirements	- POs required for purchases > \$2,500 . - PO > \$5,000 requires TM signature. - Detailed distribution process and info required on POs.	- POs required for purchases > \$5,000 . - Approval: \$5,000–\$10,000 by Department Head; > \$10,000 by Town Manager.	- POs required for all individual purchases . - Must be requested & approved by Town Manager before ordering. - Blanket POs allowed, must be approved by TM (and “with confirmation of Town Council” in certain cases). - Anyone ordering without a PO can be personally responsible.
Exceptions / Exemptions	Explicit exemption list (utilities, fuel, reimbursements, various maintenance, leases under original agreement, recurring services, professional services, town attorney, etc.). Original contract must be authorized but ongoing payments don’t go through full process.	PO exception list includes utilities & property tax bills, debt service, advertising, welfare, travel, legal & audit, vehicle allowance, insurance, postage, rents & leases (after initial approval), some transfers, payroll, maintenance agreements beyond first payment, dues, salt & winter sand , and others.	Exceptions are framed around bidding/quote requirements, not POs. Includes collaborative purchasing, utilities, professional/personal services, proprietary maintenance, renewals where quality/timeliness is critical, minor repairs, urgent major repairs with waiver, sole source, expense reimbursement, specific IT software, school-contracted services, and specified professional development.
Emergency Purchasing	Dept Head can make immediate purchases in an emergency if they can’t reach Purchasing Agent or TM; must submit a detailed report afterwards.	TM may suspend provisions of the policy and implement streamlined purchasing when an emergency is declared per Emergency Operations Plan. More centralized, policy-level emergency power.	TM or Assistant TM may make immediate purchases in an emergency; after resolution, a detailed report of all emergency expenditures and justification must go to the Town Council .
Competitive Bidding Mechanics	Uses advertised competitive selection: legal notices in a newspaper, posting in	More detailed, with RFB/RFP/RFQ/RFI defined and tied to a procurement portal (if	Refers to “Town Bidding Requirements” and routes RFPs/bids for projects & capital > \$15,000 through

Topic	Current Policy (PDF)	Draft A – ADM-110 Procurement Policy	Faber Draft B – 2025 Purchasing Procedures
Consulting / Professional Services	public places, timelines, bid opening, etc. Pretty traditional, paper-era structure.	available). Specifies notice content, public opening, evaluation criteria, bonds, insurance, etc., and introduces best-value concepts for RFPs.	Finance Director’s office, but doesn’t itself restate the full RFB/RFP process. It relies on another policy for the mechanics.
Council Involvement / Oversight	Exempts “professional services (engineers, auditors, legal services)” from purchasing procedures, but doesn’t impose extra Council control beyond big-dollar thresholds.	Has separate RFQ-based section for consultative & professional services (legal, engineering, HR, cyber, planning, auditing, public relations, etc.), with qualification-based selection & negotiation guidelines.	Tightest grip on consulting: all third-party consulting agreements (IT, HR, mgmt consulting, legal) must go to Town Council for approval regardless of amount . Also says all multi-year contracts/agreements require Council approval. Council is heavily in the loop: - All multi-year contracts. - All consulting agreements (any \$). - Engineering, construction, projects & capital equipment > \$15,000. - Purchases > \$15,000 not on exceptions list. - Over-expanded lines must be approved by TM with confirmation of Council .
Ethics / Conflicts of Interest	Council votes required for: - Purchases > \$25,000 that are not budgeted and need transfers. - All purchases > \$100,000. Also involved in specific roles like appointing Town Attorney.	Council role is more implicit; primary authority lives with Town Manager and administrative process. Council shows up mainly via Charter, references to laws, and not as a constant approver on thresholds.	Adds a hard prohibition on the Town doing business with elected officials and their family members to avoid appearance of conflict. Also reinforces personal liability for people who bypass PO procedures.
Vendor Suspension / Debarment	Dedicated <i>Ethics in Public Purchasing</i> section: conflicts of interest, gratuities, kickbacks, contingent fees, concurrent employment, misuse of confidential info, plus sanctions.	Has a <i>Conflicts of Interest</i> section tightly aligned with procurement (no vendor assistance in writing specs, no sharing procurement-sensitive info, etc.) and also references Town Code of Ethics & state debarment laws.	No dedicated suspension/debarment process; enforcement is via Council control, approvals,
Vendor Suspension / Debarment	No formal suspension/debarment regime in the current	Large, detailed suspension & debarment framework: grounds (fraud, criminal conduct, poor	No dedicated suspension/debarment process; enforcement is via Council control, approvals,

Topic	Current Policy (PDF)	Draft A – ADM-110 Procurement Policy	Faber Draft B – 2025 Purchasing Procedures
Property / Asset Disposition	chapter, beyond general ethics expectations.	performance, misrepresentation, regulatory violations, prior debarments), procedures, notice, hearings, appeals to Town Council, and reinstatement rules.	and “we’re not doing business with you again” energy, not a codified process.
Cooperative Purchasing / Piggybacking	Full section on disposal by sealed bid or auction, notice requirements, payment types, etc.	Silent on surplus property disposition; would need to rely on another policy or keep existing chapter language. Two separate sections: Piggybacking (using other governments’ competitively bid contracts) and Cooperative Purchasing with formal cooperatives, plus grant-funding caveats.	Also silent; focused on purchasing and fiscal controls, not asset sale mechanics. Encourages collaborative purchasing (state bids, other municipalities, etc.). Directs TM to contact nearby towns/cities periodically to assess cooperative arrangements.
Federal Grants / 2 CFR 200 Compliance	Just says when federal/state assistance is involved, follow applicable laws & regs; doesn’t name check the uniform guidance.	Explicitly references 2 CFR Part 200 cost principles and debarment rules, incorporating federal grant compliance into Town policy.	Mentions DRA rules & GAAP but doesn’t explicitly incorporate 2 CFR 200; seems intended to sit on top of a separate procurement policy that would handle that.
Bulk / Strategic Purchasing	Mentions taking advantage of bulk, seasonal, and cooperative purchasing in Purchasing Agent duties but not as a separate procedure.	Has a specific <i>Bulk Purchases</i> section directing departments to plan and consolidate common items and capital outlay for town-wide bulk buys.	Encourages cooperative purchasing; no dedicated “bulk” section, but the spirit is similar.
Status Relative to Existing Code	This is the current policy, codified as Chapter VI of the Municipal Code.	New policy that would coexist with or replace the chapter as a more robust administrative ADM-110 if adopted, but does not, by itself, explicitly repeal Chapter VI in its text.	Explicitly states that, upon adoption, it supersedes the existing Municipal Code Chapter VI – Purchasing Policy , except where the new document is silent and old provisions remain until updated.

VI. Avoiding Political Influence in Procurement Decisions

- Operational procurement decisions must remain insulated from political influence, a standard recognized across municipal best practices.
- Shifting routine procurement approvals to the Council creates the perception—and potential reality—of political involvement in vendor selection, contract awards, and operational expenditures.
- ADM-110 maintains a clear firewall between legislative oversight and administrative execution.

VII. Conclusion

ADM-110 presents the Town with a modernized, Charter-compliant, efficient, and professionally structured procurement policy. It provides strong financial controls, transparency, and operational resilience.

The proposal from Councilor Faber, while well-intended, would:

- conflict with the Town Charter,
- significantly impair operational efficiency,
- exceed staffing and software capacity,
- weaken accountability and risk controls, and
- impede the Town's ability to deliver timely services to residents and businesses,
- creates the perception—and potential reality—of political involvement in vendor selection, contract awards, and operational expenditures.
- creates conflicts and redundancies with existing policies/code provisions such as the grant policy and the purchasing card policy.

For these reasons, I respectfully recommend that the Council take the appropriate amount of time to review all three documents and not rush to act on the proposal. Adequate time should be allowed for staff review and testing of the policy before it is implemented. The development of public policy is most effective when there is a collaborative, well thought out process involving elected officials, staff and citizens. Neither the proposed Purchasing Procedures document nor the DRAFT ADM-110 have gone through a thorough vetting process.

