

County of Elk Procurement Policy



**COMMUNITY DEVELOPMENT BLOCK GRANT
(CDBG) PROGRAM**

**AND “On Behalf Of” (OBO)
RIDGWAY BOROUGH**

TABLE OF CONTENTS

PURPOSE	2
POLICY	2
PROCUREMENT BY STATES (2CRF 200.317).....	2
PROCUREMENT STANDARDS (2 CFR 200.318)	2
Contract Administration	2
Conflicts of Interest.....	2
Code of Conduct.....	2
General Procurement Standards	3
Dispute Resolution	3
Force Account Labor.....	4
Competition (2 CFR 200.319).....	4
Full and Open Competition	4
Geographical Preferences.....	4
Selection Procedures	4
Pre-Qualified Lists	4
METHODS OF PROCUREMENT (2 CFR 200.320).....	5
Micro-Purchases.....	5
Small Purchases.....	5
Sealed Bids (Formal Advertising).....	5
Competitive Proposals.....	5
Noncompetitive Proposals.....	6
MBE/WBE AND LABOR SURPLUS AREAS (2 CFR 200.321)	6
Policy.....	6
Affirmative Steps	6
RECOVERED MATERIALS (2 CFR 200.322)	7
CONTRACT COST AND PRICE (2 CFR 200.323)	7
DCED REVIEW (2 CFR 200.324)	7
BONDING REQUIREMENTS (2 CFR 200.325).....	8
CONTRACT PROVISIONS (2 CFR 200.326).....	8
Exhibit 1	10

PURPOSE

The Procurement Policy's purpose is to set forth a path to procure materials for all community development projects using Community Development Block Grant funds (CDBG).

This policy shall apply to both the County of Elk and Ridgway Borough administered On Behalf Of Elk County (referred to herein as OBOs), although other communities in the County may choose to adopt this plan as well. The plan may be adopted by any other municipality within the County that is utilizing federal funds.

A list of communities covered by the plan is attached as Exhibit 1.

POLICY

The County of Elk and the OBO must abide by 2 CFR 200 Regulations. Invoices containing items that are not properly procured will not be paid.

All procurement shall be conducted in a manner that assures maximum free and open competition.

PROCUREMENT BY STATES (2 CFR 200.317)

When procuring property and services under a Federal award, a state must follow the same Policies and Procedures it uses for procurements from its non-Federal funds. The state will comply with §200.322 Procurement of recovered *materials* and ensure that every purchase order or other contract includes any clauses required by section §200.326 Contract provisions. All other non-Federal entities, including sub recipients (County of Elk) of a state, will follow §§200.318 General procurement standards through 200.326 Contract provisions.

PROCUREMENT STANDARDS (2 CFR 200.318)

Contract Administration

The County of Elk will maintain a contract administration system to ensure that contractors perform in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

Conflicts of Interest

No employee of the County or OBO may participate in the selection, award, or administration of a contract supported by CDBG, or any other Housing and Urban Development (HUD) program if a conflict of interest, real or apparent, would be involved. Such a conflict would arise when any of the following parties has a financial or other interest in the firm selected for award:

1. Employees of the County or OBO;
2. Any member of an employee's immediate family;
3. An employee's partner or;
4. An organization that employs, or is about to employ any of the above.

Should there be an appearance of a conflict of interest, the County of Elk will document the circumstances in accordance with 24 CFR Part 570.611 for CDBG and submit the documentation to the Department of Community and Economic Development (DCED) for a ruling.

Code of Conduct

Employees of the County and OBO are expressly forbidden from soliciting or accepting money, gifts,

gratuities, services, favors, or anything of monetary value from any person, company, firm, or corporation to which any purchase order or contract is or might be awarded or from a party to any potential subcontract. The County shall take disciplinary action in accordance with the Elk County Personnel Rules and Regulations against any covered persons who violate this policy.

General Procurement Standards

The County of Elk will review proposed procurements to avoid purchase of unnecessary or duplicative items. Consideration will be given to consolidating or breaking out procurements to obtain a more economical purchase.

The County of Elk and the OBO will use Federal excess and surplus property in lieu of purchasing new equipment and property whenever such use is feasible and reduces project costs.

The County of Elk will use value engineering clauses in contracts for construction projects of sufficient size to offer reasonable opportunities for cost reductions. Value engineering is a systematic and creative analysis of each contract item or task to ensure that its essential function is provided at the overall lower cost.

The County of Elk will make awards only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, and financial and technical resources.

The County of Elk will follow 2 CFR 200.213 Suspension and Debarment which restricts awards, sub awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in federal assistance programs or activities.

The County of Elk will maintain records sufficient to detail the significant history of procurement. These records will include, but are not necessarily limited to the following: rationale for the method of procurement, selection of contract type, contractor selection or rejection, and the basis for the contract price.

The County of Elk will use time and material type contracts only (1) after a determination that no other contract is suitable; and (2) if the contract includes a ceiling price that the contractor exceeds at its own risk. An appropriate degree of oversight will be asserted in the contract in order to obtain reasonable assurance that the contractor is using efficient methods and effective cost controls.

Dispute Resolution

The County of Elk will be responsible, in accordance with good administrative practice and sound business judgment, for the settlement of all contractual and administrative issues arising out of procurements. These issues include, but are not limited to source evaluation, protests, disputes, and claims. These standards do not relieve the County of any contractual responsibilities under its contracts. Violations of law will be referred to the local, State, or Federal authority having proper jurisdiction.

The County of Elk will use the grievance procedure outlined herein to address disputes relating to procurement. Anyone with a concern about the procurement process must exhaust all administrative remedies with the County before pursuing the matter with DCED. If DCED is unable to resolve the matter, the review may be submitted to HUD. Reviews by the Federal agency will be limited to:

1. Violations of Federal law or regulations and the standards of this section (violations of State or local law will be under the jurisdiction of State or local authorities) and
2. Violations of the grantee's protest procedures for failure to review a complaint or protest. Protests received by the Federal agency other than those specified above will be referred to the grantee.

In the event of a dispute about procurement or contracting, the complaint must be filed with the Community Development Block Grant (CDBG) Coordinator. If the matter cannot be resolved by the coordinator or a response made to the complainant within 15 business days, the matter must be brought to the attention of the

Elk County Board of Commissioners. If the Board or its designee cannot satisfy the complainant or respond within 15 business days, the matter will be directed to DCED.

Force Account Labor

If any project applicant to the CDBG program proposes to use force account labor for a project, the project application must reflect that use and must complete the Use of Force Account Labor form as provided by DCED.

Competition (2 CFR 200.319)

Full and Open Competition

The County of Elk will conduct all procurement transactions in a manner providing full and open competition consistent with the standards of 2 CFR 200.319. Some of the situations considered to be restrictive of competition include but are not limited to:

1. Placing unreasonable requirements on firms in order for them to qualify to do business,
2. Requiring unnecessary experience and excessive bonding,
3. Noncompetitive pricing practices between firms or between affiliated companies,
4. Noncompetitive awards to consultants that are on retainer contracts,
5. Organizational conflicts of interest,
6. Specifying only a brand name product instead of allowing an equal product to be offered and describing the performance of other relevant requirements of the procurement, and
7. Any arbitrary action in the procurement process.

Geographical Preferences

The County of Elk will not permit the use of statutorily or administratively imposed in-State or local geographical preferences in the evaluation of bids or proposals, except in those cases where applicable Federal statutes expressly mandate or encourage geographic preference. Nothing in this section preempts State licensing laws. When contracting for architectural and engineering (A/E) services, geographic location may be a selection criterion provided its application leaves an appropriate number of qualified firms, given the nature and size of the project, to compete for the contract.

Selection Procedures

All solicitations must incorporate a clear and accurate description of the technical requirements for the material, product, or service to be procured. Such description shall not, in competitive procurements, contain features which unduly restrict competition. The description may include a statement of the qualitative nature of the material, product or service to be procured, and when necessary, shall set forth those minimum essential characteristics and standards to which it must conform if it is to satisfy its intended use. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a brand name or equal description may be used as a means to define the performance or other salient requirements of procurement. The specific features of the named brand which must be met by offerors shall be clearly stated. Solicitations will identify requirements which the offerors must fulfill and all other factors to be used in evaluating bids or proposals.

Pre-Qualified Lists

The County of Elk will ensure that all prequalified lists of persons, firms, or products which are used in acquiring goods and services are current and include enough qualified sources to ensure maximum open and free competition. Also, grantees will not preclude potential bidders from qualifying during the solicitation period.

METHODS OF PROCUREMENT (2 CFR 200.320)

Micro-Purchases

Procurement by micro-purchase is the acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold. The micro-purchase threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) (2CFR 200.67). The current threshold is \$10,000 except as otherwise discussed in Subpart 2.1 of that regulation, but this threshold is periodically adjusted for inflation. To the extent practicable, the non-Federal entity must distribute micro-purchases equitably among qualified suppliers. Micro-purchases may be awarded without soliciting competitive quotations if the non-Federal entity considers the price to be reasonable.

Small Purchases

Small purchase procedures are those relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than the Simplified Acquisition Threshold. The simplified acquisition threshold is set by the Federal Acquisition Regulation at 48 CFR Subpart 2.1 (Definitions) and in accordance with 41 U.S.C. 1908. Thresholds are periodically adjusted for inflation. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources.

Sealed Bids (Formal Advertising)

Bids are publicly solicited and a firm-fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming with all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bid method is the preferred method for procuring construction. In order for sealed bidding to be feasible, the following conditions should be present, per 2 CFR 200.320(c)(1):

1. A complete, adequate, and realistic specification or purchase description is available;
2. Two or more responsible bidders are willing and able to compete effectively and for the business; and
3. The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

1. The invitation for bids will be publicly advertised and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time prior to the date set for opening the bids;
2. The invitation for bids, which will include any specifications and pertinent attachments, shall define the items or services in order for the bidder to properly respond;
3. All bids will be publicly opened at the time and place prescribed in the invitation for bids;
4. A firm fixed-price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
5. Any or all bids may be rejected if there is a sound documented reason.

Competitive Proposals

The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost-reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

1. Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical;

2. Proposals will be solicited from an adequate number of qualified sources;
3. The County of Elk will have a method for conducting technical evaluations of the proposals received and for selecting awardees;
4. Awards will be made to the responsible firm whose proposal is most advantageous to the program, with price and other factors considered; and
5. The County of Elk may use competitive proposal procedures for qualifications- based procurement of architectural/engineering (A/E) professional services whereby competitors' qualifications are evaluated and the most qualified competitor is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms are a potential source to perform the proposed effort.

Noncompetitive Proposals

Procurement by noncompetitive proposals is procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, competition is determined inadequate. Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids or competitive proposals and one or more of the following circumstances applies:

1. The item is available only from a single source;
2. The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation;
3. The Pennsylvania Department of Community and Economic Development (DCED) authorizes noncompetitive proposals in response to a written request from the County of Elk; or
4. After solicitation of a number of sources, competition is determined inadequate;
5. Cost analysis, i.e., verifying the proposed cost data, the projections of the data, and the evaluation of the specific elements of costs and profits, is required;
6. The County of Elk may be required to submit the proposed procurement to the awarding agency for pre- award review in accordance with #3 in this section above.

MBE/WBE AND LABOR SURPLUS AREAS (2 CFR 200.321)

Policy

The County of Elk will take all necessary affirmative steps to assure that minority firms, women's business enterprises, and labor surplus area firms are used when possible.

Affirmative Steps

Affirmative steps shall include:

1. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
2. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
3. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority business, and women's business enterprises;
4. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority business, and women's business enterprises;
5. Requiring the prime contractor, if subcontracts are to be let, to take the affirmative steps listed in numbers 1-5 of this section.

RECOVERED MATERIALS (2 CFR 200.322)

The County of Elk will comply with section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired during the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

CONTRACT COST AND PRICE (2 CFR 200.323)

The County of Elk will perform a cost or price analysis in connection with every procurement action in excess of the Simplified Acquisition Threshold including contract modifications. The method and degree of analysis is dependent on the facts surrounding the particular procurement situation, but as a starting point, the county must make independent estimates before receiving bids or proposals.

The County of Elk will negotiate profit as a separate element of the price for each contract in which there is no price competition and, in all cases, where cost analysis is performed. To establish a fair and reasonable profit, consideration will be given to the complexity of the work to be performed, the risk borne by the contractor, the contractor's investment, the amount of subcontracting, the quality of its record of past performance, and industry profit rates in the surrounding geographical area for similar work.

Costs or prices based on estimated costs for contracts under Federal grants will be allowable only to the extent that costs incurred or cost estimates included in negotiated prices are consistent with Federal cost principles (see 2 CFR 200 Subpart E – Cost Principles)

The cost plus a percentage of cost and percentage of construction cost methods of contracting will not be used.

DCED REVIEW (2 CFR 200.324)

The County of Elk, will make available, upon request of DCED, technical specifications on proposed procurements where DCED believes such review is needed to ensure that the item and/or service specified is the one being proposed for purchase. This review generally will take place prior to the time the specification is incorporated into a solicitation document. However, if the County desires to have the review accomplished after a solicitation has been developed, DCED may still review the specifications, with such review usually limited to the technical aspects of the proposed purchase.

The County of Elk will, on request, make available for DCED pre-procurement review, procurement documents, such as requests for proposals or invitations for bids, independent cost estimates, etc. when:

1. DCED determines that the county's procurement procedures or operation fails to comply with the procurement standards in this section; or
2. The procurement is expected to exceed the Simplified Acquisition Threshold and is to be awarded without competition or only one bid or offer is received in response to a solicitation; or
3. The procurement, which is expected to exceed the simplified acquisition threshold, specifies a "brand name" product; or
4. The proposed award is more than the Simplified Acquisition Threshold and is to be awarded to other than the apparent low bidder under a sealed bid procurement; or
5. A proposed contract modification changes the scope of a contract or increases the contract amount by more than the Simplified Acquisition Threshold.

The County of Elk, will be exempt from the pre-procurement review of this section if DCED agency determines that applicable procurement systems comply with the standards of this section. Compliance may be documented as follows:

1. The County of Elk may request that its procurement system be reviewed by DCED to determine whether its system meets these standards in order for its system to be certified. Generally, these reviews shall occur where there is a continuous high-dollar funding, and third-party contracts are awarded on a regular basis.
2. The County of Elk may self-certify its procurement system. Such self-certification shall not limit DCED's right to survey the system. Under a self-certification procedure, DCED may wish to rely on written assurances from the county that it is complying with these standards. The County will cite specific procedures, regulations, standards, etc., as being in compliance with these requirements and have its system available for review.

BONDING REQUIREMENTS (2 CFR 200.325)

For construction or facility improvement contracts or subcontracts exceeding the Simplified Acquisition Threshold, DCED may accept the bonding policy and requirements of the County provided DCED has made a determination that the Federal interest is adequately protected. If such a determination has not been made, the minimum requirements shall be as follows:

1. A bid guarantee from each bidder equivalent to 10 percent of the bid price. The "bid guarantee" shall consist of a firm commitment such as a bid bond, certified check, or other negotiable instrument accompanying a bid as assurance that the bidder will, upon acceptance of his bid, execute such contractual documents as may be required within the time specified.
2. A performance bond on the part of the contractor for 100 percent of the contract price. A "performance bond" is one executed in connection with a contract to secure fulfillment of all the contractor's obligations under such contract.
3. A payment bond on the part of the contractor for 100 percent of the contract price. A "payment bond" is one executed in connection with a contract to assure payment as required by law of all persons supplying labor and material in the execution of the work provided for in the contract.

CONTRACT PROVISIONS (2 CFR 200.326)

The County of Elk contracts must contain the applicable provisions described in Appendix II to 2 CFR Part 200:

1. Contracts for more than the simplified acquisition threshold, which is the inflation adjusted amount determined by the Civilian Agency Acquisition Council and the Defense Acquisition Regulations Council (Councils) as authorized by 41 U.S.C. 1908, must address administrative, contractual, or legal remedies in instances where contractors violate or breach contract terms, and provide for such sanctions and penalties as appropriate.
2. All contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement.
3. **Equal Employment Opportunity.** Except as otherwise provided under 41 CFR Part 60, all contracts that meet the definition of "federally assisted construction contract" in 41 CFR Part 60-1.3 must include the equal opportunity clause provided under 41 CFR 60-1.4(b), in accordance with Executive Order 11246, "Equal Employment Opportunity" (30 FR 12319, 12935, 3 CFR Part, 1964-1965 Comp., p. 339), as amended by Executive Order 11375, "Amending Executive Order 11246 Relating to Equal Employment Opportunity," and implementing regulations at 41 CFR part 60, "Office of Federal Contract Compliance Programs, Equal Employment Opportunity, Department of Labor."

4. **Davis-Bacon Act**, as amended (40 U.S.C. 3141- 3148). When required by Federal program legislation, all prime construction contracts in excess of \$2,000 awarded by non-Federal entities must include a provision for compliance with the Davis-Bacon Act (40 U.S.C. 3141- 3144, and 3146- 3148) as supplemented by Department of Labor regulations (29 CFR Part 5, "Labor Standards Provisions Applicable to Contracts Covering Federally Financed and Assisted Construction"). In accordance with the statute, contractors must be required to pay wages to laborers and mechanics at a rate not less than the prevailing wages specified in a wage determination made by the Secretary of Labor. In addition, contractors must be required to pay wages not less than once a week. The non-Federal entity must place a copy of the current prevailing wage determination issued by the Department of Labor in each solicitation. The decision to award a contract or subcontract must be conditioned upon the acceptance of the wage determination. The non-Federal entity must report all suspected or reported violations to the Federal awarding agency.
5. **Copeland "Anti-Kickback" Act** (40 U.S.C. 3145), as supplemented by Department of Labor regulations (29 CFR Part 3, "Contractors and Subcontractors on Public Building or Public Work Financed in Whole or in Part by Loans or Grants from the United States"). The Act is intended to aid in the enforcement of the minimum wage provisions of the Davis-Bacon Act and various statutes dealing with federally assisted construction that contain similar minimum wage provisions. Any contractor must be prohibited from inducing, by any means, any person employed in the construction, completion, or repair of public work, to give up any part of the compensation to which he or she is otherwise entitled. The County of Elk must report all suspected or reported violations to the Federal awarding agency.

If a project is exempt from Davis Bacon but costs more than \$25,000, then state prevailing wage rates will apply. Single Family Housing Rehabilitation and Demolition, would for example, be exempt from Davis Bacon but might require the use of state wage rates if the cost is expected to exceed \$25,000.

6. **Contract Work Hours and Safety Standards Act** (40 U.S.C. 3701- 3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers must include a provision for compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Under 40 U.S.C. 3702 of the Act, each contractor must be required to compute the wages of every mechanic and laborer on the basis of a standard work week of 40 hours. Work in excess of the standard work week is permissible provided that the worker is compensated at a rate of not less than one and a half times the basic rate of pay for all hours worked in excess of 40 hours in the work week. The requirements of 40 U.S.C. 3704 are applicable to construction work and provide that no laborer or mechanic must be required to work in surroundings or under working conditions which are unsanitary, hazardous or dangerous. These requirements do not apply to the purchases of supplies or materials or articles ordinarily available on the open market, or contracts for transportation or transmission of intelligence.
7. **Rights to Inventions Made Under a Contract or Agreement**. If the Federal award meets the definition of "funding agreement" under 37 CFR § 401.2 (a) and the county or contractor wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment or performance of experimental, developmental, or research work under that "funding agreement," the county or contractor must comply with the requirements of 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.
8. **Clean Air Act** (42 U.S.C. 7401- 7671q) and the **Federal Water Pollution Control Act** (33 U.S.C. 1251- 1387), as amended - Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards, orders or regulations issued pursuant to the Clean Air Act (42 U.S.C. 7401- 7671q) and the Federal Water Pollution Control Act as amended (33 U.S.C. 1251- 1387). Violations must be reported to the Federal awarding agency and the Regional Office of the Environmental Protection Agency (EPA).

9. **Debarment and Suspension** (Executive Orders 12549 and 12689) - A contract award (see 2 CFR 180.220) must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." SAM Exclusions contains the names of parties debarred, suspended, or otherwise excluded by agencies, as well as parties declared ineligible under statutory or regulatory authority other than Executive Order 12549.
10. **Byrd Anti-Lobbying Amendment** (31 U.S.C. 1352) - Contractors that apply or bid for an award exceeding \$100,000 must file the required certification. Each tier certifies to the tier above that it will not and has not used Federal appropriated funds to pay any person or organization for influencing or attempting to influence an officer or employee of any agency, a member of Congress, officer or employee of Congress, or an employee of a member of Congress in connection with obtaining any Federal contract, grant or any other award covered by 31 U.S.C. 1352. Each tier must also disclose any lobbying with non-Federal funds that takes place in connection with obtaining any Federal award. Such disclosures are forwarded from tier to tier, up to the non-Federal award.
11. See 2 CFR 200.322 – Recovered Materials.

Exhibit 1: List of communities within Elk County covered by plan:

Non-Entitlement Communities within Elk County

Benezette Township
Fox Township
Highland Township
Horton Township
Jay Township
Johnsonburg Borough
Jones Township
Millstone Township
Ridgway Township
Spring Creek Township


DCED Entitlement Communities within Elk County

City of St. Marys
Ridgway Borough

Duly adopted by motion on March 3, 2020.

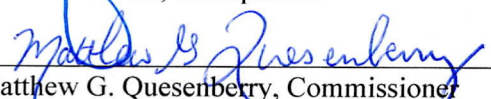
This plan reviewed and readopted:
May 9, 2024

ATTEST:


Patrick E. Straub, Chief Clerk

ELK COUNTY BOARD OF COMMISSIONERS


M. Fritz Lecker, Chairperson


Matthew G. Quesenberry, Commissioner


Gregory J. Gebauer, Commissioner