ANNEX A GOVERNMENT PROCUREMENT POLICY BOARD Agency Procurement Compliance and Performance Indicator (APCPI) Self-Assessment Form

Name of Agency: <u>BULACAN AGRICULTURAL STATE COLLEGE</u>
Date of Self Assessment: <u>03/31/2019</u>

Name of Evaluator: <u>DR. HERMINIO B. GIRON</u>
Position: <u>Vice President AFBA/BAC Chair</u>

No.	Assessment Conditions	Agency Score	APCPI Rating*	Comments/Findings to the Indicators and SubIndicators	Supporting Information/Documentation (Not to be Included in the Evaluation
	R I. LEGISLATIVE AND REGULATORY FRAMEWORK ator 1. Competitive Bidding as Default Method of Procuremen	t			
a	Percentage of competitive bidding and limited source bidding contracts in terms of amount of total procurement	58.67%	0.00		PMRs
b	Percentage of competitive bidding and limited source bidding contracts in terms of volume of total procurement	0.90%	0.00		PMRs
ndic 2.a	ator 2. Limited Use of Alternative Methods of Procurement Percentage of shopping contracts in terms of amount of total procurement	13.48%	0.00		PMRs
2.b	Percentage of negotiated contracts in terms of amount of total procurement	27.86%	0.00		PMRs
c	Percentage of direct contracting in terms of amount of total procurement	0.00%	3.00		PMRs
l.d	Percentage of repeat order contracts in terms of amount of total procurement	0.00%	3.00		PMRs
2.e	Compliance with Repeat Order procedures	n/a	n/a		Procurement documents relative to conduct of Repeat Order
2.f	Compliance with Limited Source Bidding procedures	n/a	n/a		Procurement documents relative to conduct of Limited Source Bidding
ndia	ator 3. Competitiveness of the Bidding Process				
3.a	Average number of entities who acquired bidding documents	1.88	0.00		Agency records and/or PhilGEPS records
s.b	Average number of bidders who submitted bids	1.88	0.00		Abstract of Bids or other agency records
.c	Average number of bidders who passed eligibility stage	1.88	1.00		Abstract of Bids or other agency records
3.d	Sufficiency of period to prepare bids	Fully Compliant	3.00		Agency records and/or PhilGEPS records
3.e	Use of proper and effective procurement documentation and technical specifications/requirements	Fully Compliant	3.00		Cost Benefit Analysis, Work Plans, Technical Specifications included in bidding documents
		Average I	1.18		
-	RR II. AGENCY INSTITUTIONAL FRAMEWORK AND MANAGEME ator 4. Presence of Procurement Organizations			A	
1.a	Creation of Bids and Awards Committee(s)	Fully Compliant	3.00		Verify copy of Order creating BAC; Organizational Chart; and Certification of
4.b	Presence of a BAC Secretariat or Procurement Unit	Fully Compliant	3.00		Verify copy of Order creating BAC Secretariat; Organizational Chart; and Certification of Training
					Certification of Haining
ndic	ator 5. Procurement Planning and Implementation			T	T
ā.a	An approved APP that includes all types of procurement	Compliant	3,00		Copy of APP and its supplements (if any)
5.b	Preparation of Annual Procurement Plan for Common-Use Supplies and Equipment (APP-CSE) and Procurement of Common-Use Supplies and Equipment from the Procurement Service	Fully Compliant	3.00		APP, APP-CSE, PMR
5.c	Existing Green Specifications for GPPB-identified non-CSE items are adopted	Not Compliant	0.00		ITBs and/or RFQs clearly indicate the use of green technical specifications for the procurement activi
n d'	nator 6. Use of Covernment Flateria P				
erecit?	Percentage of bid opportunities posted by the PhilGEPS-	100.00%	3.00		Agency records and/or PhilGEPS records
	registered Agency		L		
6.a 6.b	registered Agency Percentage of contract award information posted by the PhilGEPS-registered Agency	100.00%	3.00		Agency records and/or PhilGEPS records

ANNEX A GOVERNMENT PROCUREMENT POLICY BOARD Agency Procurement Compliance and Performance Indicator (APCPI) Self-Assessment Form

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tify specific procurement-related for in the agency website and specific site links of PMR and received copy that it was nitted to GPPB (including Supplemental andments, if any) and PMRs
on in the agency website and specific site links of PMR and received copy that it was nitted to GPPB
nitted to GPPB
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including Supplemental amendments, y)and PMRs
oncy Procedures/Systems for the fluct of needs analysis or market arch, monitoring of timely delivery of ds, works, or services Tracts with amendments and attions to order amount to 10% or less
is .
d's
ds .
ples of forms used to evaluating urement performance on top of or rporated within the regular ssment for Procurement Personnel
for copies of Office Orders, training ules, list of participants, schedules of al training conducted
for copies of documentation of vities for bidders
fy actual procurement records and took to retrieve records (should be nore than two hours) to Section 4.1 of User's Manual for of procurement-related documents for ord-keeping and maintenance.
fy actual contract management rds and time it took to retrieve rds should be no more than two hours
fine fire

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Name of Agency: <u>BULACAN AGRICULTURAL STATE COLLEGE</u>
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No.	Assessment Conditions	Agency Score	APCPI Rating*	Comments/Findings to the Indicators and SubIndicators	Supporting Information/Documentation (Not to be Included in the Evaluation
12.b	Timely Payment of Procurement Contracts	On or before 30 days	3.00		Ask Finance or Accounting Head of Agency for average period for the release of payments for procurement contracts
		Average III	2.67		
	AR IV. INTEGRITY AND TRANSPARENCY OF AGENCY PROCURE	MENT SYSTEM			
Indi	cator 13. Observer Participation in Public Bidding				
13.a	Observers are invited to attend stages of procurement as prescribed in the IRR	Fully Compliant	3.00		Verify copies of Invitation Letters to CSOs and professional associations and COA (List and average number of CSOs and PAs invited shall be noted.)
India	cator 14. Internal and External Audit of Procurement Activitie	S	-		
14.a	Creation and operation of Internal Audit Unit (IAU) that performs specialized procurement audits	Fully Compliant	3.00		Verify copy of Order or show actual organizational chart showing IAU, auidt reports, action plans and IAU recommendations
14.b	Audit Reports on procurement related transactions	Above 90- 100% compliance	3.00		Verify COA Annual Audit Report on Action on Prior Year's Audit Recommendations
India	cator 15. Capacity to Handle Procurement Related Complaints	3			
15.a	The Procuring Entity has an efficient procurement complaints system and has the capacity to comply with procedural requirements	Fully Compliant	3.00		Verify copies of BAC resolutions on Motion for Reconsiderations, Protests and Complaints; Office Orders adopting mesures to address procurement-related complaints
1 1					
India	cator 16. Anti-Corruption Programs Related to Procurement	T	T		
16.a	Agency has a specific anti-corruption program/s related to procurement	Fully Compliant	3.00		Verify documentation of anti-corruption program
		Average IV	2.50		
GRA	.ND TOTAL (Avarege I + Average II + Average III + Average IV	(4)	2.26		

Summary of APCPI Scores by Pillar

A	APCPI Pillars	Ideal Rating	Agency Rating
	egislative and Regulatory Framework	3.00	1.18
A	Agency Insitutional Framework and Management Capacity	3.00	2.70
F	Procurement Operations and Market Practices	3.00	2.67
-	ntegrity and Transparency of Agency Procurement Systems	3.00	2.50
	Total (Pillar I+Pillar II+Pillar III+ PillarIV)/4	3.00	2.26



ANNEX B GOVERNMENT PROCUREMENT POLICY BOARD CONSOLIDATED PROCUREMENT MONITORING REPORT

Name of Agency: BULACAN AGRICULTURAL STATE COLLEGE

	Total Amount of Approved APP	Total Number of Procurement Activities	No. of Contracts Awarded	Total Amount of Contracts Awarded	No. of Failed Biddings	Total No. of Entities who Acquired Bid Docs	Total No. of Bidders who Submitted Bids	Total No. of Bidders who passed Eligibility Stage	No. of Bid Opportunities Posted at PhilGEPS	No. of Contract Award Posted at PhilGEPS	Total No. Of Contracts that incurred negative slippage	Total No. of contracts with amendments to order or variation orders	No. of Contracts Awarded within prescribed timeframes
Column 1	Column 2	Column 3	Column 4	Column 5	Column 6	Column 7	Calumn 8	Column 9	Column 10	Column 11	Column 12	Column 13	Calumn 14
1. Public Bidding*													
1.1. Goods	40,190,000.00	7	7	39,619,229.00	0	14	14	14	7	7	0	0	7
1.2. Works	2,500,000.00	1	1	2,455,718.00	0	1	1	1	1.	1	0	0	1
1.3. Consulting Services					***************************************						MOREOUS PROPERTY OF THE PROPER	***************************************	
Sub-Total	42,690,000.00	8	8	42,074,947.00	0	15	15	15	8	8	0	0	8
2. Alternative Modes													
2.1.1 Shopping (52.1 a above 50K)													
2.1.2 Shopping (52.1 b above 50K)							The same of the sa						
2.1.3 Other Shopping	10,182,021.01	802	802	9,666,647.08									
2.2.1 Direct Contracting (above 50K)													
2.2.2 Direct Contracting (50K or less)													
2.3.1 Repeat Order (above 50K)													
2.3.2 Repeat Order (50K or less)													
2.4. Limited Source Bidding													
2.5.1 Negotiation (Common-Use Supplies)													
2.5.2 Negotiation (Recognized Government Printers)													
2.5.3 Negotiation (TFB 53.1)													
2.5.4 Negotiation (SVP 53.9 above 50K)	21,409,500.00	81	75	19,977,692.70					81	75			
2.5.5 Other Negotiated Procurement (Others above 50K)													
2.5.6 Other Negotiated Procurement (50K or less)											-0		
Sub-Total Sub-Total	31,591,521.01	883	877	29,644,339.78					81	75			
3. Foreign Funded Procurement**													
3.1. Publicly-Bid													-
3.2. Alternative Modes													
Sub-Total	0.00	0	0	0.00									
4. Others, specify:													
TOTAL	74,281,521.01	891	885	71,719,286.78									

^{*} Should include foreign-funded publicly-bid projects per procurement type

HERMINIO B. GIRON, PH. D.

Vice President AFBA/BAC Chair

President/HOPE

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^{**} All procurement using Foreign Funds excluding National Competitive Bidding (NCB) contracts; conversion to peso will be at BSP rates at the time the bids/quotations were submitted

Name of Agend		BULACAN AGRICULTURAL DR. HERMINIO B. GIRON	STATE COLLEGE	Date:	31-Mar-19 Vice President AFBA/BAC Chair
Ivallie of Ivesp	orideric.	DR. FIERMANIE D. GINON		1 001110111	
			ach condition/requirement met as must be answered completely.	s provided below and	then fill in the corresponding blanks
1. Do you have	e an approve	ed APP that includes all types of	f procurement, given the following	g conditions? (5a)	
X	Agency	prepares APP using the prescrib	bed format		
Х		ed APP is posted at the Procurin provide link: basc.edu.ph/imag	ng Entity's Website ges/sampledata/BASC/PDFs/APF	² 2018.pdf	
Х	4	sion of the approved APP to the se provide submission date:	GPPB within the prescribed dead 8/31/2018	dline	
			non-Use Supplies and Equipment n the Procurement Service? (5b)	t (APP-CSE) and	
Х	Agency	prepares APP-CSE using preso	cribed format		
х	its Guide		period prescribed by the Departm nual Budget Execution Plans issue 8/31/2018	-	anagement in
X	Proof of	f actual procurement of Commo	n-Use Supplies and Equipment fr	rom DBM-PS	
3. In the condu	uct of procur	rement activities using Repeat C	Order, which of these conditions is	s/are met? (2e)	
	Original	contract awarded through comp	petitive bidding		
	mil .	ods under the original contract munits per item	nust be quantifiable, divisible and	consisting of at least	
	mil .	t price is the same or lower than ageous to the government after p	the original contract awarded thr	ough competitive bidd	ling which is
	The qua	antity of each item in the original	contract should not exceed 25%		
	original		n the contract effectivity date state s been a partial delivery, inspection	-	
4. In the condu	uct of procur	rement activities using Limited S	Source Bidding (LSB), which of the	ese conditions is/are r	net? (2f)
	Upon re	ecommendation by the BAC, the	HOPE issues a Certification reso	orting to LSB as the p	roper modality
	mil .	ation and Issuance of a List of Prement authority	re-Selected Suppliers/Consultant	s by the PE or an ider	ntified relevant
	Transm	nittal of the Pre-Selected List by	the HOPE to the GPPB		
	procure		owledgement letter of the list by the second		
5. In giving you	ur prospecti	ve bidders sufficient period to pr	repare their bids, which of these o	conditions is/are met?	(3d)
Х	and a	documents are available at the website;	time of advertisement/posting at	the PhilGEPS website	e or
Х	Suppler	mental bid bulletins are issued a	it least seven (7) calendar days b	efore bid opening;	
Х	Minutes	s of pre-bid conference are read	ily available within five (5) days.		

6. Do you prepare the following cond		t docun	nentation and technical specifications/requirements, given the					
х	documents based on relevant cha	aracteris	d complete Purchase Requests, Terms of Reference, and other stics, functionality and/or performance requirements, as required immencement of the procurement activity					
X	No reference to brand names, except for items/parts that are compatible with the existing fleet or equipment							
Х	Bidding Documents and Requests Agency website, if applicable, and		oposal/Quotation are posted at the PhilGEPS website, spicuous places					
7. In creating you	r BAC and BAC Secretariat which	of these	e conditions is/are present?					
For BAC: (4a)								
X	Office Order creating the Bids and please provide Office Order No							
х	There are at least five (5) member please provide members and the Name/s							
A. D	r. Herminio B. Giron		July 2-4, 2018					
B. N	ls. Minerva D. Arcilla		July 2-4, 2018					
ments.	ngr. Liberato B. Silverio		Sept. 14-16, 2018					
-	ls. Anni Rose P. Pagdanganan		Jan. 29-31, 2018					
attended to the second	Is. Rona Angela O. Clarin		May 17-18, 2018					
F. <u>M</u> G	1r. Guilberto M. Villacorte Jr.		May 17-18, 2018					
X	Members of BAC meet qualificati	ions						
X	Majority of the members of BAC	are trail	ned on R.A. 9184					
For BAC Secr	retariat: (4b)							
X		Award	s Committee Secretariat or designing Procurement Unit to					
	act as BAC Secretariat		1 90300					
	please provide Office Order N	o.: <u>6</u> -	A, S-2018					
X	The Head of the BAC Secretariat please provide name of BAC \$							
- Constitution								
X	Majority of the members of BAC please provide training date:		ariat are trained on R.A. 9184 2-4, 2018					
	ducted any procurement activities of mark at least one (1) then, answe		The state of the s					
X	Computer Monitors, Desktop Computers and Laptops		Paints and Varnishes					
X	Air Conditioners	X	Food and Catering Services					
X	Vehicles	X	Training Facilities / Hotels / Venues					
	F.11	X	Toilets and Urinals					
Х	Fridges and Freezers	П	Textiles / Uniforms and Work Clothes					
Х	Copiers							
Do you use g	reen technical specifications for the	procur	ement activity/ies of the non-CSE item/s?					
	Yes	Χ	No					

9. In determining these conditions i	whether you provide up-to-date procurement information easily accessible at no cost, which of s/are met? (7a)
Х	Agency has a working website please provide link: www.basc.edu.ph
X	Procurement information is up-to-date
X	Information is easily accessible at no cost
	with the preparation, posting and submission of your agency's Procurement Monitoring Report, anditions is/are met? (7b)
Х	Agency prepares the PMRs
X	PMRs are promptly submitted to the GPPB please provide submission dates: 1st Sem - 8/10/2018 2nd Sem - 2/26/2019
X	PMRs are posted in the agency website please provide link: basc.edu.ph/images/Media/PDFs/General/BASC_2ndsem_2018.pdf and basc.edu.ph/images
Х	PMRs are prepared using the prescribed format
-	procurement activities to achieve desired contract outcomes and objectives within the target/allotted timeframe, anditions is/are met? (8c)
X	There is an established procedure for needs analysis and/or market research
X	There is a system to monitor timely delivery of goods, works, and consulting services
X	Agency complies with the thresholds prescribed for amendment to order, variation orders, and contract extensions, if any, in competitively bid contracts
12. In evaluating	the performance of your procurement personnel, which of these conditions is/are present? (10a)
Х	Personnel roles, duties and responsibilities involving procurement are included in their individual performance commitment/s
X	Procuring entity communicates standards of evaluation to procurement personnel
X	Procuring entity and procurement personnel acts on the results and takes corresponding action
	following procurement personnel have participated in any procurement training and/or professionalization program ree (3) years? (10b)
	Date of most recent training: 7/24/2018
	Head of Procuring Entity (HOPE)
Х	Bids and Awards Committee (BAC)
Х	BAC Secretariat/ Procurement/ Supply Unit
X	BAC Technical Working Group
	End-user Unit/s
	Other staff
14. Which of the procuring entity?	following is/are practised in order to ensure the private sector access to the procurement opportunities of the (10c)
Х	Forum, dialogues, meetings and the like (apart from pre-bid conferences) are conducted for all prospective bidders at least once a year
X	The PE promptly responds to all interested prospective bidders' inquiries and concerns, with available facilities and

	g whether the BAC Secretariat has a system for keeping and maintaining procurement records, anditions is/are present? (11a)
X	There is a list of procurement related documents that are maintained for a period of at least five years
X	The documents are kept in a duly designated and secure location with hard copies kept in appropriate filing cabinets and electronic copies in dedicated computers
х	The documents are properly filed, segregated, easy to retrieve and accessible to authorized users and audit personnel
	g whether the Implementing Units has a system for keeping and maintaining procurement records, anditions is/are present? (11b)
Х	There is a list of contract management related documents that are maintained for a period of at least five years
Х	The documents are kept in a duly designated and secure location with hard copies kept in appropriate filing cabinets and electronic copies in dedicated computers
Х	The documents are properly filed, segregated, easy to retrieve and accessible to authorized users and audit personnel
	g if the agency has defined procedures or standards for quality control, acceptance and inspection and services, which of these conditions is/are present? (12a)
X	Agency has written procedures for quality control, acceptance and inspection of goods, services and works
Have you prod	cured Infrastructure projects through any mode of procurement for the past year?
X	Yes No
If YES, plea	ase answer the following:
х	Supervision of civil works is carried out by qualified construction supervisors Name of Civil Works Supervisor: Engr. Edwin C. Sumaway
	Agency implements CPES for its works projects and uses results to check contractors' qualifications (applicable for works only) Name of CPES Evaluator:
	l it take for your agency to release the final payment to your supplier/service provider or contractor/consultant,once complete? (12b) days
A. EI B. Sł C. Pr D. Pr E. Bi	Observers for the following procurement activities, which of these conditions is/are met? (13a) igibility Checking (For Consulting Services Only) nortlisting (For Consulting Services Only) re-bid conference reliminary examination of bids id evaluation ost-qualification
X	Observers are invited to attend stages of procurement as prescribed in the IRR
X	Observers are allowed access to and be provided documents, free of charge, as stated in the IRR
X	Observer reports, if any, are promptly acted upon by the procuring entity
	nd operating your Internal Audit Unit (IAU) that performs specialized procurement audits, ditions were present? (14a)
х	Creation of Internal Audit Unit (IAU) in the agency Agency Order/DBM Approval of IAU position/s: Memo #42, S, 2013 - July 15, 2013
Х	Conduct of audit of procurement processes and transactions by the IAU within the last three years
X	Internal audit recommendations on procurement-related matters are implemented within 6 months of the submission

21. Are COA reco report? (14b)	ommendations responded to or implemented within six months of the submission of the auditors'
	Yes (percentage of COA recommendations responded to or implemented within six months)
Х	No procurement related recommendations received
	g whether the Procuring Entity has an efficient procurement complaints system and has the capacity occdural requirements, which of conditions is/are present? (15a)
Х	The HOPE resolved Protests within seven (7) calendar days per Section 55 of the IRR
X	The BAC resolved Requests for Reconsideration within seven (7) calendar days per Section 55 of the IRR
X	Procuring entity acts upon and adopts specific measures to address procurement-related complaints, referrals, subpoenas by the Omb, COA, GPPB or any quasi-judicial/quasi-administrative body
23. In determinin conditions is/are	g whether agency has a specific anti-corruption program/s related to procurement, which of these present? (16a)
X	Agency has a specific office responsible for the implementation of good governance programs
X	Agency implements a specific good governance program including anti-corruption and integrity development
X	Agency implements specific policies and procedures in place for detection and prevention of corruption

Annex D

PROCUREMENT CAPACITY DEVELOPMENT ACTION PLAN TEMPLATE

Name of Agency: BULACAN AGRICULTURAL STATE COLLEGE

Period: 2018

Sub-Indicators	Key Area for Development	Proposed Actions to Address Key Areas	Responsible Entity	Timetable	Resources Needed
1.a	Percentage of competitive bidding and limited source bidding contracts in terms of amount of total procurement	Increase the level of compliance to gain rating in the coming years by improving the procurement management operation and processes, on competitive bidding.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
1.b	Percentage of competitive bidding and limited source bidding contracts in terms of volume of total procurement	Increase the level of compliance to gain rating in the coming years by improving the procurement management operation and processes, on competitive bidding.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
2.a	Percentage of shopping contracts in terms of amount of total procurement	Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
2.b	Percentage of negotiated contracts in terms of amount of total procurement	Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
2.c	Percentage of direct contracting in terms of amount of total procurement				
2.d	Percentage of repeat order contracts in terms of amount of total procurement				
2.e	Compliance with Repeat Order procedures				
2.f	Compliance with Limited Source Bidding procedures				
3.a	Average number of entities who acquired bidding documents	Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes on circulation of Bidding Invitation.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
3.b	Average number of bidders who submitted bids	Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes on inviting more bidders to participate	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
3.с	Average number of bidders who passed eligibility stage	Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes on inviting more bidders to participate	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
3.d	Sufficiency of period to prepare bids				
3.e	Use of proper and effective procurement documentation and technical specifications/requirements				
4.a	Creation of Bids and Awards Committee(s)				

1.Additional support staff in procurement unit. 2. Active website/Internet Connectivity 3. Office Supplies
1.Additional support staff in procurement unit. 2. Office Supplies and Training funds

	The BAC Secretariat has a system for keeping and maintaining				
11.a	procurement records				
11.b	Implementing Units has and is implementing a system for keeping and maintaining complete and easily retrievable contract management records				
12.a		Increase the level of compliance to very satisfactory in the coming years by improving the procurement management operation and processes on areas and quality control, inspection and evaluation of contractors performance.	HOPE, Enduser, Procurement Unit, BAC/TWG/Secretariat	FY 2019 onwards	1.Additional support staff in procurement unit. 2. Office Supplies
12.b	Timely Payment of Procurement Contracts				
13.a	Observers are invited to attend stages of procurement as prescribed in the IRR				
14.a	Creation and operation of Internal Audit Unit (IAU) that performs specialized procurement audits				
14.b	Audit Reports on procurement related transactions				
15.a	The Procuring Entity has an efficient procurement complaints system and has the capacity to comply with procedural requirements				
16.a	Agency has a specific anti-corruption program/s related to procurement				