




OFFICE OF THE CHIEF PROCUREMENT OFFICER
ONE WEST STREET, 1ST FLOOR
MINEOLA, NEW YORK, 11501

MEMORANDUM

To: All Department Heads and DCCOs

From: Robert Cleary,  Chief Procurement Officer

CC: John Chiara, Deputy County Executive for Compliance

Re: Vendor Ownership, Affiliate And Subsidiary Check Policy

Date: July 23, 2020

I. INTRODUCTION

Vendor responsibility review requires the contracting officer to verify prior to award that a vendor has identified its ownership and all affiliates and subsidiaries as required to be divulged on the Business History Form (BHF) and Consultant's, Contractor's and Vendor's Disclosure form (CCV). Vendors often neglect to review this information thoroughly prior to certifying the disclosure forms. Therefore, to ensure that the County vets a vendor thoroughly, it is incumbent upon the individual reviewing a vendor's responsibility to confirm that this information is correct and complete, and to review all vendor responses in this regard. This policy is introduced to ensure that the County obtains and considers all required information regarding ownership, affiliates and subsidiaries of proposed contract awardees as required in the Countywide Procurement & Compliance Policy.

II. SCOPE

This policy establishes the procedure to verify and review ownership, affiliate and subsidiary information provided by vendors in disclosure submissions.

III. VENDOR OWNERSHIP, AFFILIATE AND SUBSIDIARY CHECK PROCEDURE

When reviewing the responses to BHF questions 8 and 9, and CCV question 6, the Department Chief Contracting Officer (DCCO) or delegate of the department reviewing a vendor's responsibility shall at a minimum perform the following steps to ensure the completeness and accuracy of the information provided:

- 1) Review the vendor's responses for completeness; if the vendor is a public corporation, ensure that the most recent SEC 10-K filing is attached
- 2) Review the vendor's website for any information regarding its ownership, affiliates, and/or subsidiaries; note any findings
- 3) Review the vendor's affiliate information in PASSPort if available and note any findings
- 4) Discuss the responses with the vendor emphasizing the importance of this information being complete and accurate; request clarification, organizational chart(s) showing all related entities (above, related by common ownership or control, or controlled by the vendor); or additional information as needed

All findings must be included in revised vendor disclosure forms or as attachments. Once all questions regarding a vendor's ownership structure, affiliates, and/or subsidiaries are addressed sufficiently, the contract approval process may proceed in this regard. If following these steps there is still any question regarding the vendor's ownership structure, affiliates, and/or subsidiaries, contact the Chief Procurement Officer for further review.