CDSB

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Department	Finance
Contact	Procurement Coordinator / Finance Department
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Approval by	Board

SCOPE

This policy applies to all employees and board members involved in procuring goods and/or services for the Cochrane District Services Board (CDSB) and any entity managed by the CDSB. In the event of a discrepancy between this policy and a policy of the entity managed by the CDSB the policy with the higher standard, consistent with transparency and public sector accountability will apply. It provides guidelines for ethical conduct, accountability, and efficiency in purchasing decisions.

BACKGROUND

The CDSB Procurement Policy ensures a transparent, cost-effective, and fair procurement process. It aligns with the principles of accountability, professionalism, and continuous improvement and encompasses the CDSB Vision and Values.

POLICY

The CDSB shall:

1. Ensure that all purchases of goods and services are approved in advance via purchase order, work order, contract, or specific exemption per this policy.
2. Purchase goods/services efficiently and cost-effectively.
3. Consider total acquisition cost, not just the lowest price.
4. Minimize risks and potential conflicts.
5. Ensure openness, accountability, and transparency.
6. Ensure all decisions are defensible under public, trade, or legal scrutiny.
7. Maintain inclusive vendor selection processes.
8. Uphold the integrity of the procurement process and work to improve those processes continuously.

The policy includes:

- A **Code of Ethics** outlining personal integrity, accountability, and compliance.
- A **Prohibitions** section defining what is not allowed (e.g., conflict of interest, price-splitting).
- The **Procurement** section, describing employees' obligations and other factors in the policy.

CODE OF ETHICS

This policy shall align with the intent of the Broader Public Sector Procurement Directive as issued by the Management Board of Cabinet in July 2011, as follows. Although this policy aligns with the BPS Directive, DSSABs are not mandated to follow it; therefore, some variation from it may be observed and must be approved by a Senior Manager prior to any deviation from the BPS Procurement Directive.

1. **Personal Integrity and Professionalism**

a) All employees of CDSB involved with procurement activities must act, and be seen to act, with integrity and professionalism.
b) Honesty, care, and due diligence must be integral to all procurement activities within and between the CDSB, vendors and other stakeholders.
c) Respect must be demonstrated for each other and for the environment.
d) Confidential information must be safeguarded.
e) All employees must not engage in any activity that may create, or appear to create, a conflict of interest, such as accepting gifts or favours, providing preferential treatment, or publicly endorsing vendors or products.

2. **Accountability and Transparency**

a) Procurement activities must be open and accountable.
b) Contracting and procurement activities must be fair, transparent and conducted with a view to obtaining the best value for public money.
c) All employees must ensure that public sector resources are used in a responsible, efficient and effective manner.

3. **Compliance and Continuous Improvement**

a) All employees involved in procurement must comply with this policy and the laws of Canada, Ontario, and any other jurisdiction where they are conducting business.
b) All employees should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share innovative, leading, and best practices.

PROHIBITIONS

The following shall be considered prohibited actions under the Procurement Policy:

1. Under no circumstances will the organization bypass this policy or any applicable law if goods and/or services are to be acquired directly or indirectly from CDSB Board members or Employees.
2. No procurement of Goods and/or Services or any arrangements related to procurement shall be made if the quantity or delivery is divided, or arranged in any way, to artificially reduce the price or value of the Goods and/or Services or the estimated Total Acquisition Costs for the purpose of bypassing this policy and purchase approval limits.
3. Without limiting the above, when Goods and/or Services of the same kind or type are needed for a single project, all such Goods and/or Services shall be included in calculating the Total Acquisition Costs for this policy.
4. Employees shall comply with the CDSB Code of Conduct Policy HRA-03, and employees and Board members must not participate in any activities considered to be a Conflict of Interest.
5. Employees are not permitted to charge personal-use items to CDSB vendor accounts.

PROCUREMENT

This policy establishes approval authorities, monetary limits and corresponding required procurement methods for CDSB.

PROCUREMENT PROCESS

The Procurement Process is a two-step process: step one is selecting the approval authority, and step two is selecting the purchase method. Both Step 1 and Step 2 must be completed before a purchase can be made. Any questions about the procurement process should be directed to the Procurement Coordinator.

STEP 1: APPROVAL AUTHORITY - WHO CAN APPROVE PURCHASES:

The level of the Approval Authority shall be determined using the tables below, with a reasonably estimated Total Acquisition Cost guiding the necessary level of authority to make the purchase.

All purchases of computer hardware and software, telecommunications supplies, related peripherals, and IT-based services must be approved by the Information Technology department before purchase, regardless of the purchase amount.

All purchases of CDSB branded items (stationery, clothing, “swag”, etc) must be consistent with the Brand guidelines and approved by the Communications Manager before purchase, regardless of the purchase amount.

Community Development, Children’s Services, Paramedic Services, Corporate Services, Approval Authorities	
Delegated Purchasing Authority	**Total Acquisition Cost**
Supervisors & Commanders	Can approve local mileage and Collective Bargaining Agreement-based meals for their direct reports, up to $1K
Managers & Deputy Chief	Up to $9,999.99
Directors & Paramedic Chief	$10,000.00 up to $49,999.99
CAO / CEO*	$50,000.00 up to $299,999.99
Board	Budgeted items over $300,000.00 Unbudgeted items $50,000.00 or greater

Housing and CDLHC Approval Authorities	
Delegated Purchasing Authority	**Total Acquisition Cost**
Service Person	Up to $499.99 for supplies only. May not purchase tools or equipment.
Supervisors	$500.00 up to $4,999.99
Managers	$5,000.00 up to $24,999.99
Directors	$25,000.00 up to $49,999.99
CAO / CEO*	$50,000.00 up to $299,999.00
CDSB Board	Budgeted items over $300,000.00 excluding capital projects included in the capital budget. Unbudgeted items $50,000.00 or greater

*When the CAO / CEO is not available, the Director of Finance has authority to authorize purchases up to the CAO / CEO's approval authority limit

Multi-Year Commitment

All goods, services, and/or transfer payments with a duration of greater than one (1) year shall be approved at the thresholds specified above for the entire Total Acquisition Cost throughout the duration of the goods, services, and/or transfer payments agreement. For example, a three-year (3) purchase commitment at $40,000 per year would need to be approved at the $120,000 approval level.

Board Approval

Board approval shall be required when:
a) The matters relate to the acquisition of Real Property (except for the CAO / CEO / Director of Finance delegated authority noted below for lease / rental agreements)
b) The successful bid and/or a Contract's Total Acquisition Cost are greater than the sum of the Board-approved budget amount and the CAO / CEO's Approval Authority ($50,000).
c) A contract amendment would cause the Contract's Total Acquisition Costs to exceed both the CAO / CEO's Approval Authority ($50,000) and the Board-approved budget.

CAO / CEO / Director of Finance

The CAO / CEO shall have the ability to approve:

a) All lease or rental arrangements, amendments and/or renewals, if within the Approval Authority limit of the CAO / CEO.
b) A purchase if the total cost of a successful bid is greater than the Board-approved budget for the purchase, but the successful bid is within the CAO / CEO's Approval Authority. The CAO / CEO can authorize the purchase if the Requisitioning Department has provided the CAO / CEO with satisfactory verification of a financial resource to cover the increase in cost.

When the CAO / CEO is not available, the Director of Finance has authority to authorize purchases up to the CAO / CEO's approval authority limit.

Exclusion from Approval Authority

The following items shall be excluded from the requirement related to Approval Authority and approval limits, regardless of the total acquisition cost amount, wherein the CAO / CEO or Director of Finance shall have the authority to approve purchases involving:
a) Paramedic Services' ambulances / vehicles
b) Insurance (i.e., deductibles and premiums)

Temporary Assignment of Delegated Authority

An employee can temporarily assign their delegated authority level to another employee within the organization, subject to the Departmental Director's approval, with CAO / CEO approval required for Directors to designate authority to other employees. Such assignments shall be made with the understanding that, when the Approval Authority is temporarily assigned, the employee to whom the purchase is delegated is responsible for that purchase. Delegation must be communicated in writing via email to the Accounting Department's general email address and to the procurement software administrators. Temporary delegated authority must be arranged or assigned within the organization's procurement software by the person granting the delegation or by the procurement software administrators.

STEP 2: METHOD OF PROCUREMENT

The Approval Authority, based on the circumstances of the purchase, shall authorize either a competitive, non-competitive, or excluded procurement method, as follows.

Competitive Procurement	
Generally, a competitive procurement method shall be the primary method for purchasing Goods and/or Services.	
Total Acquisition Cost	**Procurement Method**
$0- $24,999.99	The requisitioning Department may carry out the purchase in accordance with a commitment to obtain the best value for the organization, with a pre-approved purchase order or contract required. Departments may arrange purchase of goods or services on their own or with the assistance of the Procurement Coordinator as desired.
$25,000.00-$99,999.99	**Minimum of three (3) quotes.** The Procurement Coordinator, in consultation with the requisitioning Department, shall distribute a Request for Quotes. Public advertising is not required however a purchase order or Contract is required.
$100,000 or greater	**Public Procurement Process** required. The Procurement Coordinator, in consultation with the requisitioning Department, shall coordinate an open call, Request for Proposal, or Request for Tender. Public advertising is required. All calls for Goods and/or Services through a Public Procurement Process shall be approved by the CAO / CEO before being released publicly and before the Bid Award. All Proposals and Tenders shall be awarded based on the results of the scoring mechanism included in the RFP or RFT.

Non-Competitive Procurement (Sole Sourcing)	
The CAO / CEO may authorize Sole Sourcing if any of the following conditions apply. These arrangements are subject to the Approval Authority levels noted in Step 1 of this policy.	
TYPE	**CONDITIONS**
Failure of Competitive Process	An attempt to purchase the required Goods or Services has been made in good faith using a method other than Direct Negotiation (e.g., Request for Proposal, Request for Tender, etc.). Still, the process has failed to identify a successful Vendor. It is not reasonable or desirable that a further attempt to purchase the Goods or Services be made using a method other than Direct Negotiation with a Sole Source Vendor.
Emergency	The Goods and/or Services are required as a result of an Emergency, which would not reasonably permit the use of

	a method other than Direct Negotiation, as they are needed in the most expedient and economical means available. For all emergency purchases with a Total Acquisition Cost of $100,000.00 or more, the requisitioning Department must submit an information report outlining the circumstances of the procurement to the Board at its next scheduled meeting.
Specialized Vendor	The required Goods and Services are to be supplied by a particular vendor having special knowledge, skills, expertise or experience, which others do not have and cannot obtain in a reasonable time frame.
Standardization	The standardization of a purchase with existing equipment, technology, product standards, facilities or service is a paramount consideration.
Confidential	Where Goods or Services regarding matters of a confidential or privileged nature are to be purchased and the disclosure of those matters through a competitive procurement process could reasonably be expected to compromise CDSB confidentiality, cause economic disruption, or otherwise be contrary to the public interest.
Purchasing Groups	The CDSB can coordinate with other government agencies, public authorities, or other types of private co-operative purchasing groups when it is in the CDSB's best interest to do so.
Geographic Limits	Where construction materials are to be purchased, and it can be demonstrated that transportation costs or technical considerations impose geographic limits on the available supply base.
Security	Where compliance with the competitive procurement provisions set out in the Procurement Policy would interfere with CDSB's ability to maintain security or order or to protect human, animal or plant life or health.
Monopoly	The required Goods and Services are reasonably available from only one source because of scarcity of supply in the market, a statutory or market-based monopoly, and/or the existence of exclusive rights held by any Vendor (patent, copyright, license).
Warranty	A need to avoid violating warranties and guarantees where Service is required.
Lessor	For work to be performed on or about a leased item thereof that may be performed only by the lessor.
Contractor	For work to be performed on property by a contractor according to provisions of a warranty or guarantee held in respect of the property or the original work.
Research	For the procurement of a prototype of a first Good and/or Service to be developed in the course of and for a particular contract for research, experiment, study or original development, but not for any subsequent purchases.

Bankruptcy	For the purchase of Goods under exceptionally advantageous circumstances, such as bankruptcy or receivership, but not for routine purchases.
Art	For the procurement of original works of art.

Where Sole Sourcing is pursued, the Approval Authority must complete a Sole Source Form (attached) and submit it to the Procurement Coordinator for review before the CAO / CEO authorizes Direct Negotiations. For Direct Negotiations, it is the responsibility of the Approval Authority to make every effort to obtain the lowest possible Total Acquisition Costs as appropriate.

EXCLUDED GOODS/SERVICES

The following Goods and/or Services are exempt from step 2 requirements for a competitive or non-competitive procurement method and do not require a purchase order or Sole Source Form. These arrangements are subject to the Approval Authority levels noted in Step 1 of this policy.

ITEM	**CONDITIONS**
Transfer Payments	Where a ministry has directed payments to a particular group (i.e., Child Care Providers, OW Recipients, HPP recipients)
Transfer Payments	Where a ministry has directed payments under prescribed circumstances (i.e., for social housing complexes or rents / rent supplements paid on behalf of clients)
Training / Education	Conferences or conventions (prior approval required by Department Director regardless of cost)
Training / Education	Workshops, courses and seminars or facilitators to present same (prior approval required by Department Director regardless of cost)
Training / Education	Subscriptions (newspaper, magazine, or periodicals) (prior approval required by Department Director regardless of cost)
Refundable Expenses	Meal allowance per travel expense claim form
Refundable Expenses	Travel - transportation and accommodation expenses
General expense	Payroll and payroll deduction remittances
General expense	Medical documentation / forms
General expense	Insurance premiums and deductibles
General expense	Tax remittances
General expense	Refunds of overpayments received by CDSB
General expense	Licenses, certificates and similar documents as required
General expense	Memberships, association fees
General expense	Recurring costs for software maintenance and licensing, network maintenance, cyber security
General expense	Postal or courier fees
General expense	Monthly photocopy fees
Professional / Special Services	Banking services (including the borrowing and investment of money). Approval required by CAO / CEO and Director of Finance in all instances.

Professional / Special Services	Special tax, accounting and audit services, and advice from external auditors. Approval required by Director of Finance in all instances.
Professional / Special Services	Insurance and insurance brokers. Approval required by CAO / CEO and Director of Finance in all instances.
Professional / Special Services	Legal services. Approval required by CAO / CEO in all instances.
Professional / Special Services	Special consulting services. Approval required by CAO / CEO in all instances.
Professional / Special Services	Medical, clinical and laboratory services
Professional / Special Services	Confidential items including investigators, forensic auditors
Professional / Special Services	Counseling fees
Professional / Special Services	Payroll Specialized Consulting Services
Professional / Special Services	Group benefit plans
Professional / Special Services	Committee Fees
Professional / Special Services	Honorariums
Professional / Special Services	Medical supplies as approved and/or required by the specific Ministry of Health Guidelines.
Professional / Special Services	Purchase of gasoline or fuel for vehicles and equipment.
Professional / Special Services	Advertising (including radio, television, newsprint, or online media).
Professional / Special Services	Entertainers or public speakers for special events.
Professional / Special Services	Appraisal fees
Utilities	Water / Sewer / Natural Gas / Electricity
Utilities	Telephone and telecommunication services
Real Property	All real estate transactions, including the purchase, lease, or sale of real property. Approval required by CAO / CEO and Director of Finance in all instances.

For excluded items, it is the responsibility of the Approval Authority to make every effort to obtain the lowest possible Total Acquisition Costs as appropriate.

Purchase Orders
All procurement of goods and/or services not on the exclusions list must be made using an approved purchase order issued from CDSB-approved procurement software.

Exception: Purchases made on Amazon Business do not require a purchase order because Amazon Business features a built-in approval system before the goods are shipped.

Preference
No preferences shall be shown or taken into account in acquiring Goods and/or Services except when CDSB recognizes that it is in the best interest of the organization and/or clients to do so. Additionally, the preference and justification must be clearly stated in the competitive procurement process documents (e.g. Request for Quotation, Request for Proposal, etc.); and the weight assigned to factors justifying a preference must be included in the evaluation section; and the weight assigned to the preference must not exceed 10% of the total evaluation score.

Contract Execution

The following individuals are authorized to legally bind the organization:

- Board Chair
- Board Vice-Chair
- CAO / CEO (alternate for CDSB is Director of Health, alternate for CDLHC is Director of Housing)
- Director of Finance

Role of Directors - Contracts

Regardless of the Total Acquisition Cost amount, requisitioning Department Directors are responsible for determining that Contracts:

1. Meet the requirements of this Policy.
2. Have been reviewed appropriately, including by finance, procurement, legal (if needed).
3. Are consistent with the strategic plan, risk appetite, business plan, Board-approved Budget, collective agreement, employment contracts, and/or any mandated outcomes.
4. Meet the CDSB stated Vision and Values.

Contractor Requirements

Before the provision of Goods and/or Services and for the entire duration of a Contract, the Approval Authority shall ensure that the Vendor has provided the required evidence of insurance, and any required security and/or a Certificate of Clearance from the Workplace Safety and Insurance Board ("WSIB") as the Contract requires.

RESPONSIBILITIES

- **Supervisors/Managers/Directors/Paramedic Chiefs/Board**: Approve purchases within authorized limits.
- **Procurement Coordinator**: Provide guidance, obtain quotes, coordinate public tenders, and review contracts.
- **CAO / CEO**: Final approval for high-value procurements, leases, and contract amendments.
- **All Employees**: Comply with procurement rules and report conflicts of interest.
- **Department Directors**: Ensure all contracts meet policy and legal requirements.

VIOLATIONS

Non-compliance with this policy may result in disciplinary action in accordance with CDSB standards. Examples include bypassing approval limits, price-splitting, or engaging in conflicts of interest.

DEFINITIONS

"**Approval Authority**" refers to the delegated Employee or Board with the authority to approve a purchase; "Authorized Person" has the same meaning.

"**Award**" means authorization to proceed with the purchase of Goods and/or Services from a chosen Vendor.
"**Bid**" means an offer or submission from a bidder or proponent in response to a Bid Request; "**Proposal**" and "**Quote**" have the same meaning.
"**Bid Request**" means a formal invitation for Bids issued by CDSB that defines the rules and standards for selecting a Vendor for needed Goods and/or Services based on a predefined scope of Work and evaluation criteria; "Solicitation" has the same meaning.
"**Board**" refers to the Board of Cochrane District Services, as the context may require.
"**Budget**" means the Board-approved Department budget(s), including authorized revisions.
"**Chief Administrative Officer**" or "**CAO**" means the head of operations at the CDSB, their designate or any successor position thereto.
"**Chief Executive Officer**" or "**CEO**" means the head of operations at the CDSB, their designate or any successor position thereto.
"**Conflicts of Interest**" means the definition and obligations as defined in the Code of Conduct and per the Conflict-of-Interest Declaration form.
"**Construction**" means the process of constructing, reconstructing, demolishing, repairing, or renovating a building, structure, or other civil engineering or architectural work. It includes site preparation, excavation, drilling, seismic and soil investigations, the supply of products and materials, and the supply of equipment and machinery, if they are part of and incidental to the construction. The installation and repair of fixtures for a building, structure, or other civil engineering or architectural project are also included. However, it does not encompass professional services related to the construction Contract unless they are specified in the procurement documents.
"**Contract**" means a negotiated and reciprocal legal arrangement for the Purchase and sale of Goods and/or Services.
"**Department**" refers to the organizational units managed by a senior management member.
"**Designate**" means a person authorized by the CAO, CEO, or respective Director to act on their behalf for this policy.
"**Direct Cost**" means administrative costs, construction costs, currency exchange costs, delivery costs, disposal costs, inflationary costs, insurance costs, inventory costs, lease costs, licensing costs, programming costs, purchase costs, rental costs, service costs, staffing costs, warranty costs, taxes, and a minimum contingency amount of 10%. It excludes any rebates or options where CDSB can elect not to purchase.
"**Direct Negotiation**" refers to a non-competitive procurement process involving sole sourcing, which shall take place only under exceptional circumstances as specified in this Policy.
"**Director**" refers to the position title that has responsibility and authority over a department.
"**CDSB**" refers to the Cochrane District Services Board.
"**Emergency**" means a situation, or threat of an impending problem, which may affect the environment, life, safety, health and/or welfare of the general public, the Board, volunteer or an employee while acting on CDSB's behalf, or to prevent severe damage, disruption of work, or to restore or to maintain essential service to a minimum level, or where funding has been directed by the Ministry to be expended within a timeline that prohibits the use of a Competitive Process; the CAO / CEO shall have the authority to determine if a situation is an Emergency.
"**Employee**" means a person employed by the CDSB with a defined role and who works for the CDSB.

"**Goods**" means raw materials, products, equipment, and other physical objects of every kind and description or movable property, including the cost of installing, operating, maintaining, or manufacturing such movable property or intangible Goods such as software.
"**Ministry**" means a governmental organization of Canada or the Province of Ontario, headed by a minister who manages a specific sector of public administration.
"**Multi-Year Commitment**" refers to a Contract for Goods and/or Services that has a duration exceeding one year.
"**Preferred Bidder**" means the Bidder short-listed by an Evaluation Committee, which is then recommended to the Procurement Authority for Award.
"**Procurement Method**" means the purchasing process required for the specified procurement circumstances, as outlined in Schedule A.
"**Professional Services**" means persons with specialized knowledge or skills for a specific Service requirement, including Architects, Surveyors, Appraisers, Accountants, Engineers, Designers, Management and Financial Consultants, and Firms or individuals with specialized competence in environmental, planning, or other disciplines.
"**Purchase**" means obtaining Goods and/or Services by leasing, renting, paying, exchange, or other means of transaction arrived at by a Competitive or Non-competitive Procurement Process; "Acquire," "Acquisition," "Expenditure", "Procure", "Procurement," and "Purchasing" have the same meaning.
"**Public Procurement**" means the formal process of acquiring Goods and/or Services from an external source through a competitive bidding process, advertised publicly as an RFP or RFT.
"**Real Property**" means immovable property such as land, buildings and fixtures on, above, or below a defined surface or legal area, and any interest therein.
"**Request for Proposal**" is part of the Competitive Process in public procurement, in which a Bidder is asked to provide a solution. A multi-stage approach is used to evaluate Bids, and the bidder with the highest cumulative score is selected as the preferred bidder. "RFP" has the same meaning.
"**Request for Quotes**" means the Competitive Process in an Invitational Procurement where CDSB invites a minimum of three (3) unique companies and/or individuals to submit a Bid where the Solution is predetermined as to the required quantity and quality; a Two-Stage approach is used to evaluate Bids; and the lowest Total Acquisition Cost is the determinative Factor for the selection of a Preferred Bidder; "RFQ" and "Request for Quotation" have the same meaning.
"**Request for Tender**" means the Competitive Process in a Public Procurement where the Solution is predetermined as to the required quantity and quality, a Two-Stage approach is used to evaluate Bids, and the lowest Total Acquisition Costs is the determinative Factor for the selection of a Preferred Bidder; "RFT" and "Tender" have the same meaning.
"**Request for Vendor of Record**" means the Procurement Method used for ad hoc, as-needed, but recurring purchases where the Solution is predetermined as to the required quantity and quality and where the Solicitation Document has invited companies and/or individuals to submit pricing and their qualification, meeting Mandatory Requirements is the determinative Factor for enrollment on a Vendor of Record registry; "RVR" has the same meaning.
"**Real Property**" means land and any buildings or structures attached directly to it.
"**Scope of Work**" means the requisitioning Department's needs, expectations, requirements, preferences, and/or deliverables for known or unknown Goods and/or Services related to a predicted Solution.

"**Services**" means services of all kinds, including but not limited to labour, Construction, maintenance, professional and consulting services, save and except those services to be delivered by an officer or employee of CDSB following the terms of employment.
"**Sole Source**" means that the preferred Good and/or Service has been reasonably determined to be available from only one company or individual. **Only one vendor sells this.**
"**Solution**" means a specific Good and/or Service that is either requested by CDSB or proposed by a Bidder based on CDSB's Scope of Work; "Product" has the same meaning.
"**Successful Bidder**" means the Bidder selected by the Contracting Authority for contract negotiations.
"**Total Acquisition Cost**" means the sum of all Direct Costs and the assessment of the Indirect Costs, for the whole duration of the intended or actual contract (including any extension terms), necessary for the Vendor to provide and/or complete the Scope or Work. (includes costs such as delivery, installation, etc.)
"**Transfer Payment**" means one-way funding from a government to an individual, an organization or another government for which the government making the transfer does not receive any goods or services directly in return, as would occur in a purchase/sale or other exchange transaction; Expect to be repaid in the future, as would be expected in a loan; or Expect a direct financial return, as would be expected in an investment.
"**Vendor**" refers to any individual or organization awarded a contract for the supply of goods and services to CDSB. The terms "Contractors," "Consultants," "Suppliers," and "Service Providers" have the same meaning.

Approved by CAO

Brian Marks

March 30, 2026

Brian Marks — Date