

Lehigh University Uniform Guidance Purchasing Regulations Q&A

1. **What constitutes a quote?** This is dependent on the good or service being purchased. Informal quotes coming from emails or internet search are acceptable, so long as the quote is for the same or similar goods or trade services.
2. **Define a Sole Source.** A true sole source is where only one vendor in the world can provide the good or service. Some examples could be licenses to intellectual property, rental of real estate etc. The current version of UG includes only 4 specific exceptions when sole sources are permitted. Those are:
 - The item is available only from a single source
 - The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation
 - The Federal awarding agency or pass-through entity expressly authorized noncompetitive proposals in response to a written request from the University
 - After solicitation of a number of sources, competition is determined inadequate
3. **Why can't I split up purchases?** Doing so would be a fraudulent attempt to avoid federal rules, subjecting Lehigh to significant penalties, and possible denial of grants. The federal government performs periodic audits of purchases to ensure compliance with federal law, including the Uniform Guidance. Auditors look at purchases over a period of time, not at single purchases. Attempts to circumvent rules are seen as fraud and could be cause for removal of ALL federal funding towards the university.
4. **We're in the middle of a multiyear grant and we've used the same equipment for the first half of the study. The PI has no intention of changing equipment and ruining his/her research. What do I do?** The best option would be to request in writing that the awarding agency grant an exemption. Contact ORSP for help.
5. **What if the first part of my purchase from the vendor was before June 30, 2018, and the balance after June 30th on a 2nd PO and the total price goes up to \$20K (or within the limits)? How far back/forward will the federal government go when looking at our purchase history?** Any purchase after July 1, 2018 is subject to Uniform Guidance.
6. **Has Purchasing updated its processes to account for Uniform Guidance?** We have created the necessary forms to add to Unimarket upon requisition submittal and Purchasing approvers will be monitoring that.
7. **Where can I find more information about the new bid thresholds?** The Office of Federal Financial Management recently drafted a memorandum updating the bid thresholds for Institutions of High Education. Starting on 7/1/18, the micro-purchase threshold was clarified to mean \$10,000 as defined in the National Defense Authorization Act ("NDAA") of 2017. The memorandum also clarifies that the NDAA of 2018 increased the Simplified Acquisition Threshold to \$250,000. The entire memorandum can be found here: <https://www.whitehouse.gov/wp-content/uploads/2018/06/M-18-18.pdf>
8. **Will my OneCard transaction limit automatically increase to \$10,000?** No, but if you and your department manager believe this is necessary, you can complete the OneCard Maintenance Form to have your monthly and transaction limit increased. Contact Brenda Bachman for more info.