



Federal Uniform Guidance Updates

(Revised January 2019)



Uniform Guidance Recap

Federal Uniform Guidance 200.318 became effective July 1, 2018

Key Points for federally and state sponsored projects:

1. Ethics and Conflicts of Interest
2. Travel and Use of Preferred Providers
3. Additional Compliance Required for Specific Purchasing Scenarios, specifically, 3 quotes or Single Source Justification (when applicable) required for purchases > \$5K

Applicability Threshold To Be Increased

Original threshold for applicability was \$5,000 per order value

The threshold will be increased effective February 1 to \$10,000 per order value.

Key effect(s): Shopping Carts, Independent Contractors, PRDs, etc. purchased against federal or state WBS elements will require UG compliance measures beginning at \$10,000 order value rather than \$5,000 (i.e., if from a non-contract supplier, require three (3) competing quotes or Single Source Justification (SSJ), if applicable).

Example Scenarios Effective 2/1 - WBS Elements

<u>Example Scenario</u>	<u>New Action as of 2/1</u>
1. Order needed from non-contract vendor for \$7000 of operational supplies.	Three quotes or Single Source not required Shopping Cart would continue to be the correct method, with one quote
2. A single piece of laboratory equipment valued at \$9500 from a non-contract vendor.	Three quotes or Single Source not required Shopping Cart would continue to be the correct method, with one quote Reminder: Use a capital equipment GL
3. A single piece of laboratory equipment valued at \$12,000 from a non-contract vendor.	Uniform Guidance requirements apply Since the order is over \$10K, three quotes or Single Source (if applicable) Reminder: Use a capital equipment GL
4. A hotel contract for an event/conference with a value of \$14,000.	Uniform Guidance requirements apply Since the order is over \$10K, three quotes or Single Source (if applicable) required with the PRD

Visual Summary (Revised 01/19)

	<=\$10,000	=>\$40,000	Notes
All Methods if on existing Contract or e-catalog, any dollar value	Green	Green	
1. Procurement Card (NA since transaction limit is \$5K)	Green	Green	No change from current
2a. PO >\$10K <\$40K not on contract	Green	Yellow (3 Quotes)	Contract or e-catalog purchases automatically comply
2b. PO Formal Competition (=>\$40K)	Green	Green	No change from current; Purchasing conducts the process > \$40K
2c. PO Single/Sole Source	Green	Yellow (Sole Source threshold lowered to \$10,000)	Threshold for a Single/Sole Source is now eligible at \$10K
Independent Contractors	Green	Yellow (3 Quotes)	Purchasing conducts the process > \$40K
3. Payment Request Document	Green	Yellow (3 Quotes)	Purchasing conducts the process > \$40K

Green > Automatically Compliant

Yellow > *Represents Change

Orange > Purchasing Conducts Formal Solicitation (No change from current)

Communications

Information will be distributed in various listservs (Purchasing, Business Officer, PI, Grants Management) and upcoming Purchasing newsletter

Uniform Guidance training PowerPoint will be updated and placed on Purchasing and Research Financial Services (RFS) websites with the new threshold information.