Date Filed: September 24, 2026

Witness: Craig Dikeman and Matthew J. Correia
Request from: Office of Education, Outreach, and Enforcement

Question:

(COMPETITIVE BID ASSESSMENTS) Refer to Response to EOE-051, Att.1. The Company's response identified that "supporting procurement records are maintained at the Purchase Order or Contract level rather than the Supplier level." Please supplement EOE-051, Att.1 with a detailed listing of the applicable purchase order or contract numbers and identify whether the POs or contracts were subject to a competitive bid or sole source approval.

Response:

Please refer to EOE-165, Attachment 1, submitted as a supplement to EOE-051, Attachment 1. The attachment provides the applicable Purchase Order and Contract numbers and identifies whether each was subject to a competitive bid or sole source approval.

There are some instances in this population where the Contract was established through a competitive bidding process, but the associated Purchase Order was supported by a Sole Source Justification. This may occur for two primary reasons:

1. In some cases, the Contract was established through a competitive bid process, but the specific work associated with the Purchase Order did not align directly with the scope originally contemplated under that competitive event. As part of the Company's procurement controls and governance processes, the Purchase Order was therefore supported by a Sole Source Justification. In these situations, there may be operational or risk-management benefits to leveraging the existing contractual terms and conditions in place with the supplier, particularly for specialized materials or services. Accordingly, the supplier selection may be supported through a Sole Source Justification while utilizing a Contract that was originally established through a competitive bid process.

2. In other cases, the Contract was established as part of a framework contracting strategy that was negotiated and supported through a competitive bid process. Under these arrangements, a Direct Award Limit is established for work assignments. Any work exceeding that limit is required to either be competitively bid among the qualified suppliers within the framework or supported by a Sole Source Justification. Accordingly, a Purchase Order may be identified as Sole Source while being issued under a Contract that was originally established through a competitive bid process.

The Company categorizes these Purchase Orders as Sole Source Justifications, however, this explanation is provided to clarify the distinction between the sourcing method used to establish the underlying Contract and the procurement process applicable to the individual Purchase Order.