

## U.S. Business Justification Form

The province of Ontario's [U.S. Procurement Restriction Policy](#) limits the university's ability to engage with U.S. businesses for the purchase of goods or services. The Procurement Restriction Policy applies to Carleton as a [Broader Public Sector institution](#), and the university will be required to demonstrate compliance with our obligations under the policy by submitting a report on its procurement activity via Procurement Services.

The Requesting Department must complete the following **before** committing to a Vendor, seeking approval, or negotiating contract terms (when applicable):

- i) Understand the [competitive procurement requirements](#), [BOBIA](#) requirements, and U.S. Procurement Restriction Policy [exemption criteria](#). (These are all **separate** requirements.);
- ii) complete the U.S. Business Justification form Sections 1-4 in full (**all fields are mandatory**); and
- iii) [demonstrate your compliance](#) with the U.S. Procurement Restriction Policy when completing your purchase.

**Need help?** Email [ProcurementServices@carleton.ca](mailto:ProcurementServices@carleton.ca).

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### Section 1 – Requesting Department Details

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Department: \_\_\_\_\_

Phone: \_\_\_\_\_

Email: \_\_\_\_\_

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### Section 2 – Purchase Summary

Short Description of Purchase: \_\_\_\_\_

Procurement Category: \_\_\_\_\_

Name of Recommended Vendor: \_\_\_\_\_

Has this Vendor [represented that they are a U.S. Business](#)? \_\_\_\_\_

Estimated Total Procurement Value: \_\_\_\_\_

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## Section 3 – Exemption Criteria

If the Vendor is a U.S. Business, you may purchase from them if they are the only viable supplier of the good or service **and** the procurement cannot be delayed.

Select at least one exemption justification from **both** sections 3.1 and 3.2. Procurement Services may request additional supporting documentation.

### 3.1 The U.S. Business is the only viable source

- ☐ The Vendor offers unique skills or technology not available from any other Vendor globally
- ☐ The Vendor holds exclusive rights or patents to the good or service
- ☐ The Vendor is the only one available within the required region or timeframe
- ☐ Use of this Vendor is required by law or regulation: \_\_\_\_\_
- ☐ Confidentiality requirements limit the use of other Vendors
- ☐ Health or safety considerations, including organizational capacity concerns
- ☐ Lack of sufficient viable Vendors in cases where multiple Vendors are required
- ☐ Where a good or service has demonstrated superior outcomes for health, safety or quality of life
- ☐ Other (please specify): \_\_\_\_\_

### 3.2 The procurement cannot be delayed

- ☐ The good or service is essential for business continuity or key program delivery
- ☐ The procurement addresses critical health or safety concerns
- ☐ Other (please specify): \_\_\_\_\_

Additional Information (optional):

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## Section 4 – Requesting Department Acknowledgement

By signing below, the Requesting Department acknowledges their awareness of the [Procurement Policy](#), including its Code of Ethics and Approval Authority Schedule. The signatories attest that the required due diligence was conducted and authorize this exemption request and related purchase.

### 4.1 Financial Approval Authority ([FAA](#) based on [FOAPAL](#) used for purchase)

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

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## Section 5 – Approvals (Facilitated by Procurement Services)<sup>1</sup>

### 5.1 Procurement Services Review

Notes:

\_\_\_\_\_  
Name: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

### 5.2 Vice-President, Finance & Administration Approval

Name: \_\_\_\_\_ Title: \_\_\_\_\_

Date: \_\_\_\_\_ Signature: \_\_\_\_\_

\_\_\_\_\_  
<sup>1</sup> Approvals of U.S. Procurement Restriction Policy exemptions are governed by the Procurement Policy.