



## Debarment and Suspension Policy

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On December 26, 2014, the federal government implemented new guidelines for the management of grants, referred to as the Uniform Guidance (2 CFR §200), that replaced OMB Circulars A-21, A-110 and A-133. Awards issued prior to this date will continue to be managed under OMB Circulars. This document is applicable to grants awarded after December 26, 2014 and references the Uniform Guidance.

### POLICY

Staff in the Office of Research and Sponsored Programs (ORSP) will determine if a proposed entity is eligible to receive federal funds prior to issuing certain types of payment on an ORSP project. Staff must ensure that entities and individuals have been reviewed for debarment and suspension via the System for Award Management found at [www.sam.gov](http://www.sam.gov) as required by 2 CFR §200 before approving payments for certain types of services. SAM.gov provides a single comprehensive list of individuals and entities excluded from receiving federal contracts or federally approved subcontracts and from certain types of federal financial and nonfinancial assistance and benefits.

Under Code of Federal Regulations §200.331, San Francisco State University will not use funds from the awards to conduct business with an entity on the debarment and suspension list. If, in the course of such review, it is determined that an entity is found to be debarred, suspended, proposed for debarment, or declared ineligible from doing business with the Federal Government, the staff member shall proceed no further with issuing the proposed Agreement or payment, and shall consult the ORSP Director immediately.

### SCOPE

- **Employees**

All employees (including Faculty receiving Additional Pay during intersession) who receive wages charged to a federal award are reviewed in SAM.gov. The review is conducted by the Compliance Unit on a semi-annual basis and is reviewed by the Director of ORSP. Employees include hourly employees, student assistants, salaried staff and any faculty member receiving Additional Pay.

- **Subrecipients, Independent Contractors, and Purchase Orders**

Entities entering into a contract with San Francisco State University (SF State) on a Federally-funded project, whether as an Independent Contractor, a Subrecipient, or via a procurement contract over \$25,000, are checked in SAM.gov prior to the contract becoming fully executed and/or the invoice(s) being approved for payment. The review is conducted by the Grant Support Coordinator assigned to the related ORSP project. The Compliance Unit also does an annual review in SAM.gov of all Subrecipients, Independent Contractors, and procurement contracts over \$25,000.

- **Corrective Action**

If an individual or entity is identified as debarred from receiving federal funds in SAM.gov, the following corrective action will be taken:

- The ORSP Director is notified.

- If the party is receiving wages charged to a federal award, those wages will not be billed to the federal award. If a potential employee is identified on the list, that person will not be offered a position at SF State.
- If the entity is a Subrecipient or Independent Contractor, an agreement will not be issued.
- If the entity is a Vendor, the purchase requisition will not be approved.

## **ROLES & RESPONSIBILITIES**

### **Office of Research and Sponsored Programs**

#### **Grant Support Coordinator (GSC)**

- Check SAM.gov for Independent Contractor, a Subrecipient, or via a procurement contract over \$25,000 prior to the contract becoming fully executed and/or the invoice(s) being approved for payment.

#### **Compliance Unit (CU)**

- Conducts semi-annual check in SAM.gov of all employees who receive wages from federal awards (employees include hourly employees, student assistants, salaried staff, and any faculty member who receives Additional Pay).
- Conducts annual check in SAM.gov of all Independent Contractors, Subrecipients, or procurement contracts over \$25,000.

#### **ORSP Director**

- If an individual or entity is identified as debarred from receiving federal funds in SAM.gov, ORSP Director is notified and will determine how to proceed.

## **RELATED DOCUMENTS**

- [Code of Federal Regulations Title 2 Subtitle A Chapter II Part 200](#)