



## Debarment and Suspension Procedure

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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.**

### BACKGROUND

Staff in the Office of Research and Sponsored Programs (ORSP) shall 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. If, in the course of such review, it is determined that an entity or individual 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.

### PROCEDURES

#### Grant Support Coordinator (GSC):

- Checks SAM.gov whether the entity/subrecipient/independent contractor is debarred and suspended prior to entering into a contract with San Francisco State University (SF State).
- Upon receipt of invoice for payment, check SAM.gov to verify that the entity/subrecipient/independent contractor is not debarred from receiving federal funds. A printout from SAM.gov is attached to the invoice.
- If entity/subrecipient/independent contractor is on the debarred list, the ORSP Director will be notified and no action will be taken until reviewed and approved by the ORSP Director.
- GSC checks BI and the PO to ensure there are enough remaining funds to pay the invoice, then stamps the invoice with approval statement requesting the PI's signature, and forwards invoice to PI for approval (cc'ing GA).
- PI approves invoice and returns to ORSP for payment processing.
- After PI has returned the signed invoice, GA/GSC:
  - Signs invoice to approve payment.
  - Forwards to Accounts Payable for payment processing.

#### Compliance Unit (CU)

- Compliance Specialist (CS) conducts annual check in SAM.gov of all Independent Contractors, Subrecipients, or procurement contracts over \$25,000.
- Compliance Specialist (CS) conducts semi-annual check in SAM.gov of all employees (including hourly employees, student assistants, salaried staff and any faculty member receiving Additional Pay).
- If an entity or individual is identified as debarred from receiving federal funds in SAM.gov, the following will happen:
  - 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.