

GOVERNMENTWIDE DEBARMENT POLICIES & PROCEDURES

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2 CFR Part 180 provides Federal guidance from the Office of Budget Management (OMB) for government-wide debarment and suspension. The purpose of the debarment and suspension system is to maintain integrity of Federally funded grants and programs by ensuring that procurement and non-procurement transactions are conducted only with responsible parties.

PROCEDURES

For the purposes of Humboldt State University Sponsored Programs Foundation (HSU SPF) this policy applies to any “person who has been, is, or may reasonably be expected to be, a participant or principal in a covered transaction.” All non-procurement transactions are considered to be covered transactions. Exceptions to this apply when dealing directly with a foreign government. Additionally all procurement transactions greater than or equal to \$25,000 are considered covered transactions.

A Federal non-procurement program is one that involves Federal financial support to recipients and, when applicable, subrecipients. HSU SPF commonly enters in to non-procurement transactions in the form of subawards and subcontracts. All of these are considered to be covered transactions and require HSU SPF to verify if the subawardee or subcontractor are disbarred or suspended. Results will be saved and placed on the T drive, in the Award Folder under the Subrecipient subfolder.

Before any subaward or subcontract can be issued by Pre Award on a Federally funded award, the Compliance Officer (CO) must check to see if they have been disbarred or suspended. To check to see if a person is on this list, a search must be conducted on SAM.gov, Government-wide System for Award Management Exclusions (SAM Exclusions). This search can be conducted using either the entity’s legal name, DUNS #, or CAGE Code. Principal Investigators (when known) should also be checked on SAM.gov for disbarment or suspension.

A procurement contract is considered a covered transaction if it is issued for an amount greater than or equal to \$25,000. All procurement contracts that are covered transactions must be checked on SAM.gov for disbarment or suspension.

The Grant Analyst (GA) will email the Compliance Officer when a procurement contract is being issued for \$25,000 or more. The CO will check on SAM.gov to ensure that the vendor is not on the debarred list and will email the results to the GA. Once the GA has been assured that the vendor is not debarred, they will approve and forward the Purchase Request and a copy of the SAM.gov results to HSU’s Procurement Department.

Procurement contracts totaling \$25,000 or more that go directly to the HSU’s Procurement Dept., rather than the Grant Analyst, will be checked on SAM.gov by the individual processing the purchase order. If the vendor is included on the exclusion list, a purchase order will not be issued and Procurement will contact the Grant Analyst with the results. It will be up to the GA to communicate this to the project’s Principal Investigator. If there are no active exclusions, then the purchase order will be authorized and a copy of the SAM.gov results will be included with the supporting documentation.



An excluded person cannot participate or be the principal on a covered transaction. HSU SPF cannot enter in to a covered transaction with any persons (legal entity) who show up on the SAM.gov excluded list. There will be a colored tab next to the search query results that says “Exclusion”. In the event that a subawardee, subcontractor, or vendor is found to be excluded or suspended on the SAM.gov website, the Grant Analyst and/or the Compliance Officer will discuss this with the project’s Principal Investigator to inform them that a new vendor must be selected.

RELATED DOCUMENTS

- The **System for Award Management (SAM)** is the Official U.S. Government system that consolidated the capabilities of CCR/FedReg, ORCA, and EPLS. <https://www.sam.gov/portal/SAM/##11>
- Title 2 → Subtitle A → Chapter I → Part 180 – OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Nonprocurement)