Debarment and Suspension Policy

Issued: January 2009
Revised: June 2014

Staff in the Office of Research and Sponsored Programs (ORSP) shall 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 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.

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.

A. Employees

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

B. Independent Contractors, Subrecipients, Purchase Orders

Entities entering into a contract with SFSU 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.

C. Corrective Action

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

A. The ORSP Director is notified
B. 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 SFSU
C. If the entity is a Subrecipient or Independent Contractor, an Agreement will not be issued
D. If the entity is a Vendor, the purchase requisition will not be approved

D. Related Documents

- OMB Circular A-133, “Audits of States, Local Governments, and Non-Profit Organizations”
- OMB Circular A-21, “Cost Principles for Educational Institutions”
- OMB Circular A-110, “Uniform Administrative Requirements for Grants and Agreements with Higher Education, Hospitals and Other Non-Profit Organizations”