

Suspension and Debarment Procedure	Procedure Number	11.2.3.2P
	Effective Date	October 05, 2026

1.0 PURPOSE

In accordance with Management and Oversight Authority Policy 11.1 and Sponsored Awards Policy 11.2, as well as Uniform Guidance 2 CFR 200.214, the purpose of this document is to ensure that any grant-related purchases are not made from an entity that has been suspended, debarred, or otherwise excluded by the federal government.

Suspension and debarment are actions taken by the federal government against organizations or individuals who have committed fraud or a criminal offense in violation of federal law. The federal government prohibits expending federal funds for goods and/or services from any entity debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities. The College will assure compliance to this federal regulation through confirmation from the federal System for Award Management (SAM).

2.0 REVISION HISTORY

Adopted on: 10/05/26

3.0 DEFINITIONS

- A. *Debarment* – An exclusion from federal procurement transactions.
- B. *Project Manager/Principal Investigator* – Individual designated by the College to manage the sponsored award project.
- C. *Sponsored Award* – A sponsored award is the transfer of money or property from an external funder that requires performance of specific duties. The funding relationship usually reflects a joint partnership in setting/meeting project goals. Most governmental funding will be for the purpose of conducting a sponsored award. The funding mechanisms used to meet this purpose can include memoranda of understanding, grants, contracts, cooperative agreements, and other legally binding means of transfer.
- D. *Suspension* - A disqualification from federal procurement transactions for a temporary period, pending debarment proceedings.

4.0 PROCEDURES

- A. Prior to making any grant-related purchase that is expected to equal or exceed \$25,000, the Project Manager/Principal Investigator must contact the Sponsored Awards Services Office. The Sponsored Awards Services Office will verify the selected vendor's status in SAM.gov and document the verification by including a screen print of the Exclusions search in the grant file.

- B. The Sponsored Awards Services Office must be included in the approval hierarchy for all grant-related purchases. Prior to providing approval for purchases equal to or exceeding \$25,000, the Sponsored Awards Services Office will note that verification for Suspension and Debarment has occurred.
- C. The Sponsored Awards Services Office will notify the Project Manager/Principal Investigator and Contracting & Procurement Office if a proposed vendor is found to be excluded. If the vendor has been found to be suspended or debarred, a different vendor will be selected.
- D. Documentation of Suspension and Debarment verification shall be retained in the official sponsored award file in accordance with the College's records retention requirements.
- E. Verification of suspension and debarment status for subrecipients is addressed through the College's Subrecipient Monitoring Procedure 11.2.3.3P.