

Suspension and Debarment Policy and Procedures

Title: Suspension and Debarment Policy

Effective Date: 06-01-2022

Issuing Authority: Vice President and CFO

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Scope

These procedures address how to check for Debarment or Suspension from an entity or agency that sub-awards or contracts for goods and/or services.

Background

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 or goods and/or services from any entity suspended or debarred from doing business with the Federal government.

Non-Federal entities are prohibited from contracting with or making sub-awards under covered transactions to parties that are suspended or debarred when the value of the contract equals or exceeds \$25,000. This dollar threshold can be found in 2 CFR 180.220(b)(1). In reference to 2 CFR 200.213, all non-federal entities are subject to the suspension and debarment rules under 2 CFR Part 180.

Purpose of Policy

To ensure contracts or purchases to an entity or agency are not made if they have been Debarred or Suspended by the federal government.

Who needs to know these Procedures

This policy and procedures apply to all St. Olaf faculty and staff that initiate contracts or purchases for grants funded, directly or indirectly, with federal funds.

Definitions

Debarment – the exclusion of a person from participating in procurement transactions with the federal government.

Suspension – a disqualification from government contracting and subcontracting for a temporary period of time because a company or individual is suspected of engaging in criminal, fraudulent, or seriously improper conduct. Suspension is to be used on an interim basis pending debarment proceedings.

All individuals and entities suspended or debarred are listed on the U.S. General Services Administration (GSA), Excluded Parties Listing System (EPLS). The search can be performed at www.sam.gov.

Policy

To ensure that St. Olaf College is not doing business with vendors who have been suspended or debarred from doing business with the Federal government, St. Olaf College will check the vendor against the Excluded Parties Listing System (EPLS) before making a payment. This is in accordance with Uniform Guidance 2 CFR 200.214 and applies to contracts for goods and services expected to equal or exceed \$25,000. Purchases for goods and services or contract purchases less than \$25,000.00 will not

be cross-checked to the debarment list; however, purchases will not knowingly be made from those entities or individuals.

Procedures

Prior to making a federally funded grant-related purchase that is expected to equal or exceed \$25,000, the Principal Investigator must contact the Grants Accountant who will check the selected vendor on www.sam.gov. The Grants Accountant will document the Suspension and Debarment verification by including a screen shot of the search in the grant file.

Semi-annually, the Grants Accountant will run a list of all vendors and employees paid from Federal funds. This list will be reviewed against the EPLS as a double check to make sure no Federal funds have been paid to excluded parties. If ever a vendor on this list is found to be suspended or debarred, the Grants Accountant will initiate a journal to move the purchases off the Federal grant. The Grants Accountant will save this listing and documentation.