

## STANDARD OPERATING PROCEDURE (SOP)

SOP Number: 19  
Effective Date: 10/25/2018  
Last Reviewed: 05/21/2019

Title:

**Debarment and Suspension Certification**

### **Sponsored Programs Contact Information**

Business Hours: 8:00 a.m. to 4:30 p.m., Monday-Friday (excluding holidays).

Main: 920-424-3215

E-mail: [OSP@uwosh.edu](mailto:OSP@uwosh.edu);

Website: [uwosh.edu/sponsoredprograms](http://uwosh.edu/sponsoredprograms)

### **I. Overview**

The University of Wisconsin Oshkosh is prohibited from contracting with or making subawards for entities that are debarred or suspended from making financial transactions with the federal government. This procedure provides an overview of the process for ensuring that UW Oshkosh Office of Sponsored Programs (OSP) does not obtain goods, services or enter into financial relationships with entities that hold a debarred and/or suspended status.

### **II. Applicability**

This procedure applies to all grant proposals that intend to establish a contractual/vendor relationship or a subaward with an entity outside of the University. Pre-Award staff in the Office of Sponsored Programs are required to check entity status in SAM.gov to ensure that the potential partner or vendor is not debarred or suspended from conducting financial business with the federal government. Confirmation of such status will occur during the proposal development phase. The Grants Accountant, in the Post-Award phase, will regularly certify that the subrecipient institution or vendor are not debarred or suspended. Pre- and Post-Award staff will confirm compliance with the federal regulations via the [Federal System for Award Management \(SAM\)](#).

### **III. Procedure:**

1. This procedure applies to all purchases of goods or services of any value under federal and non-federal grants and when initiating potential financial relationships between UW Oshkosh and a new subrecipient, contractor, consultant or vendor under a grant proposal.
2. Pre-award staff will verify that the outside entity or vendor is not currently listed as suspended or debarred in SAM.gov. This will occur during the proposal or contract development phase, prior to submission of the proposal to the sponsor.
3. Certification can be obtained in SAM.gov by following these steps:
  - a. Go to [www.sam.gov](http://www.sam.gov)
  - b. Click the "Search Records" tab
  - c. Use the "Advanced Search" option to search for entity information such as Name, Address, Location, DUNS, CAGE code, or, if working with an individual consultant, their SSN.
  - d. Enter the available information into the "Advanced Search" text box
  - e. Records containing the information will populate on the screen
  - f. Confirm that "No" is present under the line "Has Active Exclusion?"
  - g. Save search record and documentation as a PDF in the project file
4. The Grants Accountant will confirm this status again upon notice of award funding following steps a-g above, prior to procurement of such goods and services.

5. The Grants Accountant, in the Post-Award phase, will continue to confirm non-debarred or suspended status as payment requests are received for all active grants and contracts, following steps a-g above.
6. The Principal Investigator named on the award also has responsibility of confirming non-debarred or suspended status on a regular basis following steps a-g above.

**FILTER RESULTS**

**By Record Status**

Active

Inactive

**By Record Type**

Entity Registration

Exclusion

**Your search for "university\* of wisconsin\* oshkosh\*" returned the following results...**

● Entity	UNIVERSITY OF WISCONSIN SYSTEM	Status: Active	<a href="#">+</a>
DUNS: <b>071149041</b>		CAGE Code: <b>0M5A5</b>	
Has Active Exclusion?: <b>No</b>		DoDAAC:	
Expiration Date: <b>03/26/2019</b>		Debt Subject to Offset? <b>No</b>	
Purpose of Registration: <b>All Awards</b>			

7. If the third party is found to hold a suspended or debarred status in SAM.gov then the relationship or transaction with the vendor will be terminated. A new vendor or subrecipient who can provide the same goods and services will be pursued. Entities holding a suspended or debarred status pose a significantly higher risk to UW Oshkosh and continued pursuit of a relationship is not permitted.
  - a. Sponsored Programs will notify vendor in writing of the intention to terminate the agreement
8. Any purchases existing on the project account will be removed from the account by the Grants Accountant.
9. Accounts Payable will be notified that the vendor has been debarred or suspended from doing business with the federal government.

**IV. Guidance Documents/Policy Links:**

- [www.SAM.gov](http://www.SAM.gov)
- [2 C.F.R. 180.925: Debarment](#)
- [2 C.F.R. 180.1015: Suspension](#)

**V. Templates/Forms**

**VI. Definitions**

**SAM:** Federal System for Award Management. The official U.S. Government system for management of federal awards and financials. Entities and institutions must have an active SAM registration in order to enter into financial business with the federal government.

**Debarment (2 CFR 180.925):** Action taken by a debarring official to exclude a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR chapter 1). A person so excluded is debarred.

**Suspension (2 CFR 180.1015):** Action taken by a suspending official that immediately prohibits a person from participating in covered transactions and transactions covered under the Federal Acquisition Regulation (48 CFR Chapter 1) for a temporary period, pending completion of an agency investigation and any judicial or administrative proceedings that may ensue. A person so excluded is suspended.

**VII. Contact Information**

For questions or comments, please contact [OSP@uwosh.edu](mailto:OSP@uwosh.edu) or 920-424-3215

**VIII. Revision History:**

Created:10/18/18

Revised: 10/25/18; 05/21/2019