



**THE GEORGE  
WASHINGTON  
UNIVERSITY**  
WASHINGTON, DC

**Responsible University Official:**  
Compliance Office  
**Responsible Office:** Compliance Office  
**Last Revised Date:** May 22, 2008

## **DEBARMENT AND SUSPENSION**

### **Policy Statement**

The Board policy for trustees, officers, and management employees is that any suspension, debarment, or charge of criminal activity shall be reported, in writing, to the President.

### **Reason for Policy**

As a nonprofit institution serving the public good, the university and its constituencies have the right to expect that trustees, officers and management employees who have been suspended, debarred or charged with criminal activity will not be allowed to administer federal funds on behalf of the university.

### **Who is Governed by this Policy**

Faculty and staff

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## **Policy**

Each member of the Board of Trustees, officer and management employee of The George Washington University shall certify that he or she:

1. Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
2. Has not within a three-year period preceding this certification been convicted of or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction, contract, or subcontract under a public transaction; for violation of federal or state antitrust statutes; or for commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property;
3. Is not presently indicted for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in paragraph (2) above; and
4. Has not within a three-year period preceding this certification had one or more public transactions (federal, state, or local) terminated for cause or default.

## **Definitions**

**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.

**Debarment**            In general, an exclusion from government contracting and subcontracting for a reasonable, specified period of time because an individual or vendor failed to perform or their performance was inadequate.

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## Related Information

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[Federal Government System for Award Management \(SAM\)](#)

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## Contacts

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Contact	Telephone	Email
Compliance Office	(202) 994-3386	<a href="mailto:comply@gwu.edu">comply@gwu.edu</a>

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## Document History

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- **Last Reviewed Date:** March 31, 2017
  - **Last Revised Date:** May 22, 2008
  - **Policy Origination Date:** March 15, 1990
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## Who Approved This Policy

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Board of Trustees

*This policy, as well as all [university policies](#), are located on the [Office of Compliance and Privacy's](#) home page.*