FEDERALLY-DEBARRED SUPPLIERS

Policy Statement

When acquiring goods and services under federally sponsored programs, the university will not contract with a vendor who is currently either debarred or suspended from doing business with the federal government.

Reason for Policy

The university is required to buy goods and services from vendors who are in good standing with the federal government. Vendors debarred or suspended under federal regulations are not in good standing and may not be used as a vendor for such procurements.

Who is Governed by this Policy

Faculty and staff

Table of Contents

Policy Statement .................................................................................................................. 1
Reason for Policy .............................................................................................................. 1
Who is Governed by this Policy ...................................................................................... 1
Table of Contents ............................................................................................................ 1
Policy ............................................................................................................................... 2
Definitions ....................................................................................................................... 2
Related Information ......................................................................................................... 2
Contacts .......................................................................................................................... 3
Policy

When acquiring goods and services under federally sponsored programs, the university will not contract with a vendor who is currently either debarred or suspended from doing business with the federal government. Prior to contract award, and in accordance with federal requirements, the university contracting specialist will check the System for Award Management (SAM.gov) to ensure that the prospective contractor does not have an active exclusion. Results from the SAM.gov search shall be made part of the Purchase Order/Contract documentation. Should a prospective vendor be found to be debarred or suspended by the federal government, Procurement will notify the Compliance Office, the Office of the Vice President for Research and the Office of the Comptroller of this finding and place a hold on the supplier's registration within the university's financial system.

Definitions

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

Suspension: A disqualification from federal 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.

Related Information

Debarment and Suspension Policy

GW University Policies

Identification and Treatment of Unallowable Costs Policy

Major Procurement Review and Authorization Policy

System for Award Management (SAM.gov)
Contacts

<table>
<thead>
<tr>
<th>Contact</th>
<th>Telephone</th>
<th>Email</th>
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<tbody>
<tr>
<td>Procurement and Travel Services</td>
<td>202-994-2500</td>
<td><a href="mailto:procure@gwu.edu">procure@gwu.edu</a></td>
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Document History

- **Last Reviewed Date:** March 19, 2018
- **Last Revised Date:** August 17, 2009
- **Policy Origination Date:** 1997

Who Approved This Policy

Louis H. Katz, Executive Vice President and Treasurer
Beth Nolan, Senior Vice President and General Counsel

This policy, as well as all university policies, are located on the Office of Compliance’s home page.