

EUREKA COUNTY SCHOOL DISTRICT
SUSPENSION AND DISBARMENT

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

Purpose

The purpose of this policy is to ensure that grant-related purchases are not made from an entity that has been suspended or debarred by the federal government.

Definitions

Suspension: A disqualification from federal procurement transactions for a temporary period, pending debarment proceedings.

Debarment: An exclusion from federal procurement transactions.

EPLS: 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

It is the policy of the District to check procurement contracts for goods and services awarded under a non procurement transaction (e.g., grant or cooperative agreement) that are expected to equal or exceed \$25,000 for debarment or suspension of the entity and its principals.

Procedure

Pre-purchase – At the receipt of a purchase request, prior to making a grant-related purchase that is expected to equal or exceed \$25,000, the Grants office will check the selected vendor on www.sam.gov before approving the purchase request. The grants office will document the Suspension and Debarment verification by including a screen print of the Exclusions search in the grant file.

Capital Purchase Authorization – The Grants Coordinator must be included in the approval hierarchy for all grant-related purchases. Prior to approving the purchases, the Coordinator will verify and document, on the form, that the vendor has been checked on www.sam.gov for Suspension and Debarment.

Bi-annual check – Twice a year, the Grants Office 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 ensure no federal funds have been paid to excluded parties. The Grants Office will maintain documentation of this semiannual check.

Administration of Policy

The Grants Coordinator shall oversee this policy and shall review it at least once every two years. Changes to this policy shall be made in accordance with District policy.

ADOPTED: 07/11/23

REVIEWED: