

University of Missouri System

Accounting Policies and Procedures



Policy Number: APM-60.57

Policy Name: Procurement, Suspension, and Debarment

General Policy and Procedure Overview:

The Federal Government prohibits expending federal funds on goods and/or services from any entity suspended or debarred from doing business with the federal government. Procurement of goods and/or services with federal funds from a supplier or contractor should be checked for debarment before purchasing and/or awarding a contract or subaward. These procedures address how to check for debarment from an entity or agency that subawards or contracts for goods and/or services.

Definition of Key Terms:

Debarment: The exclusion of a person from participating in procurement transactions with the federal government, generally for no more than three years.

Suspension: An action which temporarily suspends federal assistance under an award pending corrective action by the awardee or pending a decision to terminate the award.

Detail Policy and Procedure:

Debarment should be checked prior to purchasing or contracting with any entity or agency to ensure the entity or agency has not been debarred or suspended by the federal government at the Excluded Party Listing System (EPLS) website (www.epls.gov). Each campus is responsible to ensure all templates for any type of procurement transaction, and all procurement contracts and agreements for both goods and services must have the following verbiage included in the documentation immediately adjacent to the signature line:

“Debarment and Suspension Certification - The contractor (or vendor, or consultant, depending on the transaction) certifies to the best of its knowledge and belief that it and its principals are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency in accordance with Executive Order 12549 (2/18/86).”

The EPLS website must be checked to verify the entity or agency has **not** been debarred or suspended prior to entering into a subaward with an entity or agency with federal dollars. The Sponsored Programs Office (SPO) must document the suspension and debarment verification by including a screen print of the EPLS search in the subaward file. If the entity or agency is on the list, contracts cannot be approved until the entity or agency is removed from the EPLS listing.

After a subaward is awarded, the SPO must verify the subrecipient is not listed on the EPLS website every time an invoice is received from the subrecipient. The suspension and debarment verification

must be documented by including a screen print of the EPLS search in the subaward file. If at any time the subrecipient appears on the EPLS website, no invoices will be paid until the entity or agency is removed from the EPLS listing.

Responsibility:

Sponsored Programs Office (SPO):

- Document evidence of verification that subrecipients are not suspended or debarred prior to awarding a subaward.
- Document evidence of verification that subrecipients are not suspended or debarred each time an invoice is received from the subrecipient.

SPO Manager (or delegate):

- On a sample basis, validate that documentation of EPLS verification for subawards is maintained.

Effective Date: January 1, 2008

Revised Date: February 25, 2009

Questions and Comments?

Questions regarding interpretation and implementation of the Accounting Policy should be directed to the Campus Accounting Office. Suggested edits or revisions to the policy should be directed to the Office of the Controller.