

 <b>Research &amp; Sponsored Programs</b> UNIVERSITY OF DENVER	<b>Office of Research and Sponsored Programs</b> <b>Policy Manual</b>  <b>Suspension and Debarment Exclusion Screening</b>
Supersedes Document Dated: XX/01/202X	Policy Number: ORSP-07
<b>Recommended By:</b> Senior Director of Sponsored Program Administration; Sponsored Program Academic Research Council <b>Approved By:</b> Senior Vice Provost for Research and Graduate Education	Effective Date: 06/20/2023

## I. PURPOSE

To provide a process by which the University will screen recipients of federal funds to verify the party has not been Excluded, Suspended or Debarred. Any individual or entity that is found to be Excluded, Suspended or Debarred Excluded or otherwise ineligible to receive federal research funding are prohibiting from applying for, administering, or receiving any federal funding.

## II. DEFINITIONS

- 2.1. Excluded means an individual that is prohibited from receiving funds from federal grants, cooperative agreements and contracts and certain types of federal financial and non-financial assistance and benefits.
- 2.2. Suspended means an individual Excluded for a temporary period of time pending debarment proceedings for suspicion of criminal, fraudulent or otherwise improper conduct.
- 2.3. Debarred means an individual Excluded for a specified period of time or indefinitely who has been found through a debarment proceeding to have engaged in criminal, fraudulent or otherwise improper conduct.
- 2.4. Sponsored Programs are programs or projects that are funded by an external entity through a written agreement (grant, agreement, or other instrument) with the University. Sponsored Programs include specific research, training, or service programs and projects.
- 2.5. Principal Investigator is the University employee that leads an externally funded program or project and is responsible for the proper conduct of research or other activity described in the proposal, grant, contract, or other instrument of agreement.
- 2.6. SAM is the System for Award Management, the federal governments repository of restricted parties, comprised of individuals and entities who are ineligible to receive federal funds due to debarment, suspension, or exclusion proceedings.

### **III. POLICY**

- 3.1. The University will screen all subrecipients to whom the University will be disbursing federal funds against the SAM.gov database.
- 3.2. All subrecipient agreements will include a provision wherein the other parties attest that they are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency.
- 3.3. Any entity found to be excluded, suspended, debarred, or otherwise ineligible to receive federal funding will be prohibited from participating in any subrecipient agreement administered by the University of Denver.

### **IV. PROCESS**

- 4.1. ORSP will conduct all exclusion screenings prior to the execution of any type of agreement

### **V. RESOURCES**

- 5.1. Guidelines to Agencies on Governmentwide Debarment and Suspension, 2 CFR § 180
- 5.2. Debarment and Suspension, Executive Order 12549
- 5.3. Certification Regarding Responsibility Matters, FAR 52.209-5