

Procedures for Ensuring Compliance with 2 CFR 215
Debarment and Suspension

Per OMB Circular 2 CFR 215 all non-procurement transactions equal to or greater than \$25,000 are considered a covered transaction and are subject to the Excluded Parties List System (EPLS) requirement. For MSU this means consultants (account code 621XXX) and subcontracts/subawards (account codes 621471/621472).

Procedures:

1) Subcontracts/subawards – handled by Office of Sponsored Programs

Verify the subrecipient institution and their Principal Investigator are not “Debarred” by checking for any exclusion at <https://www.sam.gov/portal/public/SAM/>.

- Check for the subrecipient institution by entering their Dun and Bradstreet Number (DUNS) in the proper field accessed by the **Search** button. Print report to PDF and save for verification.
- Check for the Principal Investigator by entering their name in the proper field accessed by the **Search** button. If the PI’s name is matched, use middle name or Social Security Number to exclude them. Print report to PDF and save for verification.

Check the State Debarred list to be sure they are not listed at <http://gsd.mt.gov/procurement/debarredandsuspendedvendors.asp>. Keep electronic copy of verification.

All subrecipient institutions and their Principal Investigator must be verified before a subaward/subcontract is initiated.

2) Consultants – handled by Procurement Services.

The following language is included in the standard terms and conditions for purchase orders, contracts and contracted services agreements.

DEBARMENT: The contractor certifies, by submitting this bid or proposal, that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation (contract) by any governmental department or agency. If the contractor cannot certify this statement, attach a written explanation for review by the University.

In addition for all transactions equal to or greater than \$25,000 to procure consulting services, the consultant’s name will be checked against the EPLS in Sam.gov to verify that the party/individual has not been suspended or debarred by accessing the website listed above. A copy of the search result will be stored electronically in the procurement files at the Procurement Services Office.