



## **Federal Suspension and Debarment**

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### **Purpose & Scope**

This policy sets forth the procedures and guidelines for ensuring that vendors, contractors, sub awardees, or any other external entity or individual engaged in a sponsored award lead by Colorado Mesa University (CMU) are not suspended or debarred from federal assistance programs. It is designed to maintain compliance with [Uniform Guidance \(2 CFR Part 200\)](#), safeguard the integrity of sponsored projects, and protect the interests of the university. This policy applies to any staff engaged in the administration of sponsored awards.

### **Definitions**

*Suspension:* A temporary exclusion from receiving federal assistance and benefits, including sponsored awards, due to alleged misconduct or violations of regulations.

*Debarment:* A more severe action that results in a longer-term or permanent exclusion from receiving federal assistance and benefits, including sponsored awards, due to confirmed misconduct or violations of regulations.

### **Policy**

#### *Vendor and Contractor Due Diligence*

1. Prior to entering into any agreement with a vendor, contractor or sub-awardee for a sponsored award, grant, or contract, the Office of Sponsored Programs (OSP) will conduct due diligence to ensure that the vendor or contractor is not currently suspended or debarred from federal assistance programs.
2. This due diligence will include checking the System for Award Management (SAM) and any other relevant federal databases to verify the suspension and debarment status of the vendor or contractor.

#### *Reporting Obligations*

CMU employees responsible for vendor or contractor selection must promptly report any instances of potential suspension or debarment actions against a vendor or contractor to the university's sponsored programs office and compliance officials.

#### *Review and Response*

1. Upon receiving a report of potential suspension or debarment actions against a vendor or contractor, CMU will conduct a review to determine the facts and assess the impact on the specific sponsored award, grant, or contract.
2. If the review confirms that the vendor or contractor is suspended or debarred, CMU will take the necessary actions to address the matter, which may include disqualification from the procurement process or termination of the agreement.



### *Continuation of Sponsored Awards*

In cases where vendors or contracts are suspended or debarred after the university enters into an agreement with them and the sponsored award is still active, CMU will work with sponsoring agencies to address the impact on the award. This may involve seeking an alternative vendor or contractor.

### *Responsibilities*

CMU employees involved in the vendor or contractor selection process must comply with this policy and cooperate with any investigations related to vendor or contractor suspension or debarment.