



Policies and Procedures Manual

Title: Purchasing - Federal Debarment Policy
Policy Administrator: Manager, Restricted Accounting
Effective Date: 2/1/2010
Approved by: Controller

Purpose:

The policy will provide guidance for the administration and procurement of goods and services under federal contracts for compliance with the Federal Debarment regulations.

Policy:

It is the policy of Holy Cross that all purchases of goods and services and sub awards of Federal contracts will comply with the regulations on federal Debarment. Federal Executive Order (E.O.) 12549 "Debarment and Suspension" requires that all contractors receiving individual awards using federal funds of \$25,000 or greater, and all sub recipients certify the organization and its principals are not debarred, suspended, proposed for debarment, declared ineligible or voluntarily excluded by any Federal department or agency from doing business with the Federal Government.

Procedures:

- 1.0** For all single item purchases and purchases in the aggregate from a single vendor of \$25,000 or greater a signed debarment certificate must be obtained from the vendor in advance of any purchase.
- 2.0** The Purchasing department will request from the vendor, a debarment certificate in those instances where a purchase order will be issued or a purchase will be made from a consortium contracted vendor. A copy of the debarment certificate will be maintained in the Purchasing department with the original forwarded to the Manager of Restricted Accounts for the grant file.
- 3.0** The Principal investigator will obtain a debarment certificate prior to the purchase of any goods or services where the procurement does not go through the Purchasing department. The original certificate will be forwarded to the Manager of Restricted Accounts and a copy attached to the direct payment form or contract.

- 4.0 The sub award agreement for all grants awarded to sub recipients will contain a clause whereby the sub recipient will certify as to non debarment status.
- 5.0 Once a vendor has certified to Holy Cross that they are not debarred, the [Excluded Parties List System](#) must be checked to determine if that vendor is currently on the debarred list. A copy of the website report must be printed and distributed as specified for the debarment certificate.
- 6.0 Vendors that are known to be debarred will be inactivated in the purchasing data base.

Forms:

Title
Title

Related Information:

Title: Excluded Parties List System
Title

Policy # 340040-001
Date of Last Review 2/1/2010