



**San Francisco
State University**

Office of Research and Sponsored Programs

Debarment and Suspension/ Excluded Parties

Policy

SFSU's policy and good management practice includes checking the Excluded Parties List System ((List of Parties Excluded from Federal Procurement and Non-procurement Programs) – General Service Administration's listing of contractors debarred, suspended, proposed for debarment, or declared ineligible from doing business with the Federal Government.) for individuals and entities who are either debarred or suspended from receiving Federal assistance or federal funds.

The purpose of EPLS is to provide a single comprehensive list of individuals and firms excluded by Federal government agencies from receiving federal contracts or federally approved subcontracts and from certain types of federal financial and nonfinancial assistance and benefits. The EPLS is used to keep agencies abreast of administrative, as well as, statutory exclusions taken throughout the Federal Government.

The following procedures are completed for any sub-awardees or vendors entering into a contract with SFSU (including procurement), and any employees who receive wages paid for by federal awards.

Procedure

A. Employees

All employees (including Faculty receiving Additional Pay during intersession, student assistants, salaried employees, hourly employees, and special consultants) who receive wages charged to a federal award are reviewed in the EPLS (Excluded Parties List System) annually.

The review is conducted annually by the Compliance Specialist and is reviewed by the Director of ORSP.



Employees include hourly employees, student assistants, salaried staff and any faculty member receiving Additional Pay.

Procedure for ORSP (3080) Employees

1) In HRMS (Human Resources Management System) find the following query:

SFO_LCD_DEPT_EXP_N_DTL_CHRT_FLD - LCD Rpr Select by Chart Fields

Set the following fields as follows. Set period dates to include entire FY (example July 1, 2008 to June 30, 2009)

From Pay Period End Date:	7/01/2008	
To Pay Period End Date:	6/30/2009	
Account Charged:	601%	
Fund Charged:	%	
Department Charged:	%	
Class Charged:	%	
Project Charged:	%	
Program Charged:	%	
Job Code:	%	
Union Code:	%	
Department:	3080	



- 2) Run query and download results into an excel spreadsheet. Select all. Copy all of the data. Open a regular Excel spreadsheet and paste the data into this document. Save as.
- 3) Filter by Project ID. Delete all records with projects starting 50-59 and 66-68.
- 4) Select all and Create Pivot Table – Set the pivot table to display: Last Name, First Name.
- 5) Go to the EPLS website: <https://www.epls.gov/>
Click on “Advanced Search”
- 6) Check all employees on this list under “Exact Name”. The employee is not on the debarred list if the results display no results.
- 7) Record for each individual when the EPLS check was run and if the individual is on the list.
- 8) Print out the results of the query for file

Procedure for Head Start Employees

- 1) In HRMS (Human Resources Management System) find the following query:

SFO_LCD_DEPT_EXP_N_DTL_CHRT_FLD - LCD Rpr Select by Chart Fields

Set the following fields as follows. Set period dates to include entire FY (example July 1, 2008 to June 30, 2009)

From Pay Period End Date:	7/01/2008	
To Pay Period End Date:	6/30/2009	
Account Charged:	601%	
Fund Charged:	%	
Department Charged:	%	

Class Charged:	<input data-bbox="597 197 753 243" type="text" value="%"/>
Project Charged:	<input data-bbox="597 254 753 300" type="text" value="%"/>
Program Charged:	<input data-bbox="597 310 753 357" type="text" value="%"/>
Job Code:	<input data-bbox="597 367 753 413" type="text" value="%"/>
Union Code:	<input data-bbox="597 424 753 470" type="text" value="%"/>
Department:	<input data-bbox="597 480 753 527" type="text" value="3138"/>

2) Follow the same procedure as above in #2-8. Save in the same excel sheet or same folder.

B. Independent Contractors, Sub-Contracts, Sub-Awards, Purchase Orders

All entities entering into a contract with SFSU on a Federally funded project, whether an independent contractor agreement, a sub-contract, sub-award or procurement contract over \$25,000, are checked in the EPLS prior to the contract being fully executed or the purchase order being generated.

This policy applies to both ORSP (Department 3080) and Head Start (Department 3138). The review is conducted for all Departments (3080 and 3138) by the Grant Support Coordinator initiating the paperwork for the agreement or approving the requisition. A final management review of independent contractor, sub-contract, sub-award agreements and purchase orders over \$25,000 will also be performed prior to full execution.

Procedure

- 1) Identify the project being charged for the sub-contract or vendor purchase order as a Federally funded project
- 2) Go to the EPLS website: <https://www.epls.gov/>
Click on “Advanced Search”
- 3) Check vendor or sub-contractor on this list under “Exact Name”. The vendor/sub-contractor is not on the debarred list if the results display no results.
- 4) Print out the results of the query for file
- 5) If no results are obtained from the search in EPLS, the requisition or contract can be approved.

C. Corrective Action

If an individual or entity is identified in the Excluded Parties List System, the following correction action will be taken:

- A. The Compliance Specialist and ORSP Director will be notified
- B. If the party is receiving wages charged to a federal award, those wages will not be billed to the federal award. If a potential employee is identified on the list, that person will not be offered a position at SFSU.
- C. If the party is a sub-contractor, sub-award, or independent contractor, SFSU will not enter into an agreement with this party.
- D. If the party is a vendor, the purchase requisition will not be approved.

D. Related Documents

- [OMB Circular A-133, "Audits of States, Local Governments, and Non-Profit Organizations"](#)
- [OMB Circular A-21, "Cost Principles for Educational Institutions"](#)
- [OMB Circular A-110, "Uniform Administrative Requirements for Grants and Agreements with Higher Education, Hospitals and Other Non-Profit Organizations"](#)

E. Roles and Responsibilities

Compliance Specialist: Conduct annual checking of employees in the EPLS. Review checks of EPLS. Develop corrective action plan when entities or individuals are listed in EPLS.

Grant Support Coordinator: Verify that vendors, sub-contractors, sub-awardees, independent contractors are not listed on EPLS.

ORSP Management: Review and approve all independent contractor, sub-contract, sub-award agreements and purchase orders over \$25,000 prior to full execution.