

Jackson State University
Division of Research and Federal Relations

Suspension and Debarment Procedures

It is mandatory that all Principal Investigators on applications initiated via JSU's Sponsored Programs Unit be checked for debarments and suspensions. All university partners, contractors, and subawardees must also be checked.

Debarment should be checked prior to purchasing or contracting with any entity or agency to ensure the entity or agency has not been debarred or suspended by the federal government at the System for Award Management (www.sam.gov) website or Office of Research Integrity (<https://ori.hhs.gov/>) website. Exclusion records identify those parties excluded from receiving federal contracts, certain subcontracts and from certain types of federal financial and non-financial assistance and benefits. These are also commonly known as "suspensions" and "debarments."

Process:

Upon receipt of proposal and prior to submission, the Unit of Sponsored Programs must check for debarments and suspensions as follows:

1. On the System for Award Management website (www.sam.gov), click on Search Records.
2. Under Advanced Search, select Advanced Search- Exclusion to check for the exclusion of individuals.
3. To check for the exclusion of universities, subawardees, industry partners etc., click on Advanced Search- Entity. It is not necessary to set up an account to perform these searches.
4. A secondary review via the Office of Research Integrity's website (<https://ori.hhs.gov/>) for ethical and other research misconduct must also be conducted.

Parties Who Need to Certify

Each time the University submits a proposal to the federal government, the Authorized Organizational Representative is required to complete a certification stating that the prospective primary participant and its principals are not debarred or suspended. For purposes of Jackson State University, it has been determined that the principals are Principal Investigators, employees conducting research, the Vice President for Business and Finance, the Provost/Senior Vice President for Academic Affairs, the Associate Provost/Vice President for Academic Affairs, and the President.

Based on the above, all new "principal" personnel must be checked and certified.

Approved
Amy Nelson
12/15/17

Procedures for Principal Investigator Certification

When a principal investigator submits their Internal Routing Form for a new proposal, there will be a question under the Special Approvals section that will ask whether or not the PI has been suspended or debarred. A negative response will mean that the PI:

1. Is not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any federal department or agency;
2. Has not, within a three-year period preceding this certification, been convicted of, or had a civil judgment rendered against him or her for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state or local) transaction, contract, or subcontract under a public transaction; for violation of federal or state antitrust statutes; or for commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements or receiving stolen property;
3. Is not presently indicted, for or otherwise criminally or civilly charged by a governmental entity (federal, state, or local) with commission of any of the offenses enumerated in paragraph (2) above; and
4. Has not, within a three-year period preceding this certification, had one or more public transactions (federal, state or local) terminated for cause or default.

It will be the Principal Investigator's responsibility to notify the Sponsored Programs Unit of any non-compliance or change in their status during the application process and ensuing project period. In the absence of any statement of non-compliance, the University signatory will report that all principals involved in an application of federal funds are in compliance with the debarment regulations.

A principal investigator or organization will be recorded as "JSU certified" if all of the above and the Office of Research Integrity search have been verified.

Procedures for Research Employee Certification

All JSU Principal Investigators must agree that no employee will be hired to work on their grant until they have been checked against the debarment and suspension list on the System of Award Management and for ethical and other research misconduct via the Office of Research Integrity website. If an employee has a change of status and meets any of the conditions in 1-4 above, they must immediately inform the principal investigator and the Sponsored Programs Unit.

Procedures for Officer and Administrative Certification

Annually the Sponsored Programs Unit will obtain certification from the officers and administrative employees listed above that they are in compliance with the federal requirements through e-mail correspondence.

Procedures for Subawardee Certification

The System for Award Management website must be checked to verify the entity or agency has **not** been debarred or suspended prior to entering into an agreement or contract with an entity or agency with federal funds. The Sponsored Programs Unit must document the suspension and debarment verification by including a screen print of the sam.gov search in the subawardee file. If the entity or agency is on the list, agreements or contracts cannot be processed or approved until the entity or agency is removed from the sam.gov listing.

After a contract is awarded, the **Grants and Contracts Unit** must verify the subrecipient is not listed on the System for Award Management website every time an invoice is received from the subrecipient. The suspension and debarment verification must be documented by including a screen print of the sam.gov search in the subaward file. If at any time the subrecipient appears on the sam.gov website, no invoices will be paid until the entity or agency is removed from the sam.gov listing.

Effective Date: December 4, 2017