

## Policies and Procedures

SECTION: Sponsored Programs Administration	NUMBER: 22	
CHAPTER: Sponsored Programs Administration	ISSUED: 10/2011	REVISED: 3/2013; 5/2017; 8/2021
POLICY: Federal Debarment and Suspension	PAGE 1 OF 1	

### 1. BACKGROUND

The Federal Office of Management & Budget (OMB) [\*Part 200—Uniform Administrative Requirement, Cost Principles and Audit Requirements for Federal Awards\*](#) (“Uniform Guidance”) includes debarment and suspension requirements. Section 13 stipulates that Federal awarding agencies and recipients shall comply with the non-procurement debarment and suspension common rule implementing Executive Orders 12549 and 12689, “Debarment and Suspension.” This common rule restricts sub-awards and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal Assistance programs or activities.

The Federal government prohibits contracts made with parties listed on the General Services Administration’s List of Parties Excluded from Federal Procurement or Nonprocurement Programs, available in the System for Award Management (SAM). Contractors with awards that exceed the small purchase threshold shall provide the required certification regarding their exclusion status and that of their principal employees.

The Uniform Guidance prevents direct or pass-through recipients of Federal funds from doing business with an entity or individual included on the debarment list, including contract purchases and awards.

### 2. POLICY

Creighton University shall not contract or subcontract with an entity or individual included on the debarment list. No individual participating in research at Creighton University will be included on the debarment list. Submission/approval of an application signifies that the Principal Investigator assures that all individuals participating in the research are eligible under these guidelines.