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GOVERNOR

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COMMISSIONER OF ADMINISTRATION

# State of Louisiana

Division of Administration

## Office of Statewide Reporting and Accounting Policy

March 9, 2015

**OSRAP MEMORANDUM 15-18**

TO:        Fiscal Officers
                All ISIS and Non-ISIS Agencies

FROM:      John McLean, CPA
                Interim Director

SUBJECT:    Review Exclusion List Using SAM (System For Award Management)

Non-federal entities, including state agencies, are prohibited from making federally funded payments under covered transactions to parties that are suspended or debarred by the federal government. "Covered transactions" include those procurement contracts for goods and services awarded under a nonprocurement transaction (e.g., grant or cooperative agreement) that are expected to equal or exceed $25,000 or meet certain other criteria as specified in 2 CFR section 180.220. All nonprocurement transactions entered into by a recipient (i.e., subawards to subrecipients), irrespective of award amount, are considered covered transactions, unless they are exempt as provided in 2 CFR section 180.215.

When a non-federal entity enters into a covered transaction with an entity at a lower tier, the non-federal entity must verify that the entity, as defined in 2 CFR section 180.995 and agency adopting regulations, is not suspended or debarred or otherwise excluded from participating in the transaction. OSRAP is requiring all state agencies to develop in-house policies and procedures to provide reasonable assurance that payments under covered transactions are not made to federally suspended and debarred vendors. At a minimum, these required procedures must include the following:

- Verify prior to contracting with or requisitioning goods or services from an entity that will be paid with federal funds that the entity is not suspended, debarred or otherwise excluded from participating in the transaction.
- Periodically, but no less than once each fiscal year, confirm that no entities have become suspended or debarred since the last verification check.

These verifications must be performed by checking the *Excluded Parties List System (EPLS)* maintained by the General Services Administration (GSA) and available at https://www.sam.gov/portal/SAM/. Searches must be performed using Name or DUNS number, preferably the DUNS number when available.

Written documentation such as signed certification statements or computer screen shots must be maintained as evidence that these checks were performed prior to the issuance of any payments. Please refer to the attached pages for instructions on how to search the EPLS using Name or DUNS number.

If you should have any questions concerning this memo, please call the OSRAP Help Desk at (225) 342-1097 and ask for Jennifer.

JBM:jw

1. Navigate to the System of Award Management page at https://www.sam.gov/portal/SAM/.
   Click "Search Records."



2. Key in Name under "Quick search". If you have DUNS number, enter DUNS number only. Click
   Search Bottom. If no DUNS, type name.