

**University of Michigan
Office of Research and Sponsored Projects**

Standard Operating Procedures & Policies

Category:	Miscellaneous
Procedure No.:	900.03
Title:	Excluded Parties Screening

I. Purpose & Overview

The federal government maintains a list of “excluded parties” in the System for Award Management (www.SAM.gov) that is comprised of individuals who are ineligible to receive federal funds. In order to comply with federal regulations regarding such individuals (i.e., 2 CFR 180, "OMB Guidelines to Agencies on Governmentwide Debarment and Suspension"), U-M screens Principal Investigators (PIs) and Co-Principal Investigators (Co-PIs) against the SAM list, and other lists maintained by U-M’s contracted screening vendor, to ensure that they do not receive federal funds.

The purpose of this SOP is to describe the Office of Research and Sponsored Projects’ (ORSP) screening process that promotes U-M's compliance across all campuses with Federal regulation 2 CFR 180. Note that Michigan Medicine has a separate, more frequent screening process.

II. Procedure

The procedure for screening Principal Investigators and Co-Principal Investigators for excluded party status to address the compliance requirements of Title 2 of the Code of Federal Regulations Part 180 is:

- A. Only current Principal Investigators and Co-Principal Investigators on federal funds as of the screening date will be screened for excluded party status.
- B. University Human Resources or the Export Controls Office in the U-M Office of Research will be responsible for ensuring that a screen is conducted once per academic semester of all current PIs and Co-PIs on federal funds (most excluded party lists are updated monthly).
- C. A recurring snapshot date will be selected for the generation of the list of individuals to be screened (e.g., October 1, March 1, July 1).
- D. ORSP will generate the list of individuals to be screened on the screening date.
- E. The screen will be completed by a third-party vendor who will determine whether there are any records that “match” those found on the specified lists. (i.e., that the Jane Doe on the “excluded parties” list is the same one who is employed by U-M on federal funds).
- F. If the third-party vendor verifies a “match,” the information will first be forwarded to a single point of contact in ORSP, typically the ORSP Executive Director. ORSP will coordinate consultation with the appropriate University offices (e.g., AHR, OGC, Provost’s Office, Dean’s Office, UMOR, Export Controls, etc.).
- G. The process for addressing a “match” will mirror, to the extent reasonable, the process used to evaluate criminal conviction information:

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- i. If a “match occurs, a case-by-case assessment will be undertaken using criteria such as:
 - a. Relevance of the list that resulted in a “match.”
 - b. Impact on the ability for U-M to pay the individual (i.e., federal funds may not be used).
 - c. Opportunity for the individual to respond to the information in the “match,” including:
 - 1. The individual confirms the placement on the list is in error.
 - 2. The individual confirms that he/she has been removed from the list, or is undertaking steps to be removed from the list.
 - 3. The individual provides an explanation of the circumstances that led to placement on the list.
- ii. If a current PI or Co-PI on federal funds is found to be on excluded parties list:
 - a. The PI or Co-PI will not be paid with federal funds. For example, if the PI or Co-PI were paid from a federally funded short code, the employee would be removed from that short code and an alternative source of funding identified.
 - b. A case-by-case assessment will be made to determine what additional steps, if any, may be appropriate (e.g. change in job duties, notification of granting agency of a change in grant staff, retroactive adjustment of salary charged to federal funds, or other appropriate actions).
 - c. Case-by-case determinations will also be made as to what assistance, if any, the University may offer to the employee in seeking correction of an erroneous listing or expungement or release of an accurate listing.

IV. Resources

ORSP Website: <http://www.orsp.umich.edu/>

2 CFR 180: https://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title02/2cfr180_main_02.tpl

Version No. 1	Implementation Date: 06/18/2018
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