



Standard Operating Procedures & Policies

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| 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. Non-Federal sponsors often have similar prohibitions against excluded parties working on the projects they fund. In order to comply with our federal and non-Federal regulatory requirements regarding such individuals (e.g., 2 CFR 180, "OMB Guidelines to Agencies on Governmentwide Debarment and Suspension"), U-M runs screens against the SAM list, and other lists maintained by U-M’s contracted screening vendor, to ensure that it remains compliant with excluded parties grant and contract obligations.

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 regarding excluded parties’ participation in funded activities. Note that Michigan Medicine has a separate, more frequent screening process.

II. Procedure

The procedure for screening for excluded party status is as follows:

- A. Only individuals identified as a current U-M Principal Investigator, U-M Sponsor Principal Investigator or Participating Investigator with Specified Effort on external 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 the Vice President for Research will be responsible for ensuring that a screen is conducted once per academic semester of all current U-M Principal Investigators, U-M Sponsor Principal Investigators and Participating Investigators with Specified Effort on federal and non-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

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of contact in ORSP, typically the ORSP 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:
 - 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 an individual is found to be on the excluded parties list:
 - a. The individual will not be paid with federal or applicable non-Federal funds. For example, if the individual 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 external 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

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