



<b>Policy:</b> <b>Suspended, Disqualified or Debarred Vendors to be Paid with Grant Funds</b>	<b>Category:</b> <b>Procurement and Contracting</b>		<b>Number:</b> <b>GP1800</b>
	<input type="checkbox"/> Complete Revision <input type="checkbox"/> Partial Revision <input checked="" type="checkbox"/> New	<b>Supersedes:</b>	<b>Page:</b> <b>Page 1 of 3</b>

### Policy Statement

The School District of Philadelphia shall solicit or accept bids from and shall award contracts to or consent to subcontracting only with responsible bidders. Bidders, contractors, or affiliates may be disqualified, suspended or debarred as not responsible to protect the District’s and the public’s interest in accordance with District SRC policy [621 Disqualification, Suspension or Debarment of Bidders](#), or if vendors appear on any disqualified, suspended, or debarment list issued by any agency of the federal, state or local government or the District.

### Reason for Policy

[2 CFR Part 200.212](#) requires that grantees and subgrantees must not make any award or permit any award (subgrant or contract) at any tier to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in federal assistance programs.

### Policy Requirements

The District will not purchase goods or services from any vendor who is currently disqualified, suspended, or debarred from doing business with the federal, state or local government or is deemed not responsible pursuant to the District’s SRC policy 610.1 or the District’s [Office of Procurement Services: Policies and Procedures Manual](#). This policy must be adhered to when procuring goods and services using grant funds. See District Policies [GP1600 Procurements Using Grant Funds](#) and [GP1700 Contracted Services for Grant-funded Programs](#).

The following table shows the District Office or staff member with debarment list review responsibility by purchasing threshold. Debarred lists must be reviewed prior to an award or entering into any contract or purchase agreement using grant funds whether competitively bid or not. See the [SDP Procurement Requirements Matrix for Grant Funds](#) for competitive selection requirements by purchasing threshold.

Item	Responsibility for Debarment List Review
<b>Goods</b>	
Under \$25,000	GPM
Over \$25,000	Procurement
<b>Services</b>	
Under \$15,000 (LCA)	GPM
Over \$150,000 to \$100,000	GPM
Over \$100,000	Procurement

Any District office or staff members responsible for ensuring compliance with this policy will cross-check potential vendors against the following restricted vendor lists:

- *The U.S. General Services Administration (GSA), System for Award Management*  
(<http://www.sam.gov>)
- *The Commonwealth of Pennsylvania Debarment list*  
([https://www.dgs.internet.state.pa.us/debarment\\_list/](https://www.dgs.internet.state.pa.us/debarment_list/))
- *City of Philadelphia Debarment list*  
(<http://mbec.phila.gov/procurement/forms/debarment%20list%20062207.pdf>)
- *SDP Debarment List*  
([http://webgui.phila.k12.pa.us/offices/p/procurement/documents/debarment\\_list.pdf](http://webgui.phila.k12.pa.us/offices/p/procurement/documents/debarment_list.pdf)).

Any vendor of the District who is disqualified, debarred or suspended while under contract with the District will be precluded from future contracts with the District.

### **Responsibilities**

**Office of Procurement Services (OPS)** is responsible for ensuring that potential purchases of goods of \$25,000 or more and services of \$100,000 or more are from vendors that do not appear on any federal, state or locally-generated list of disqualified, suspended, or debarred entities. OPS will document that these lists have been checked and that any bidding vendors who appear on any of the lists are screened out before a selection is made.

**Grant Program Manager (GPM)** is responsible for ensuring that potential purchases of goods for less than \$25,000 or services for less than \$100,000 are from vendors that do not appear on any federal, state or locally-generated list of disqualified, suspended, or debarred entities. Before these purchases are made, GPMs will certify that selected vendors do not appear on any of these lists, using the *[SDP Grant Quotation Form](#)*.

**Grant Compliance Monitor (GCM)** is responsible for a second level debarment review to ensure that the Office of Procurement and GPMs are fulfilling their responsibilities. GCM reviews will be periodic and based on the risk level of the program.

### **Procedures**

#### **Forms**

- *[SDP Procurement Requirements Matrix for Grant Funds](#)*
- *[SDP Grant Quotation Form](#)*

#### **Definitions**

#### **Contacts**

- *[Office of Grant Development and Compliance](#)*
- *[Office of Procurement Services](#)*

### **Frequently Asked Questions**

#### **Related Information**

- *[Web Address for OMB A-102: http://www.whitehouse.gov/omb/circulars\\_a102](http://www.whitehouse.gov/omb/circulars_a102)*

- *SRC policy 610.1: Disqualification, Suspension or Debarment of Bidders*
- *SDP Office of Procurement Services: Policies and Procedures Manual (2008)*
- *GP1600 Procurements Using Grant Funds*
- *GP1700 Contracted Services for Grant-funded Programs*
- *The U.S. General Services Administration (GSA), Excluded Parties Listing System*
- *The Commonwealth of Pennsylvania Debarment list*
- [Office of Procurement Services Website](#)
- [CFR 34 Part 80.35](#)
- *District Contract Handbook*

## History

### Amended:

- Amended on 5/8/2015 for reference updated for the Uniform Grant guidance and technical adjustments.

Issue Date: 7/1/2012	Effective Date: 7/1/2015	Approved by: Chief of Grant Development and Compliance
-------------------------	-----------------------------	---