

Implementation Tips for USAID Partners

Sharing Resources and Knowledge Among the Global CSO Community

Compliance 7 | 2018

Definitions

System for Award Management

(SAM)—A searchable database that provides a comprehensive list of individuals, firms and organizations that are not eligible to receive USG funds. Grant recipients are responsible for using this online database to check vendors prior to contracting for services or making any purchases.

Unallowable Costs—Costs the USG will not reimburse, either because of regulations or because the cost is not reasonable or appropriate.

References

[System for Award Management](#)

[Executive Order 13224
on Terrorism Financing](#)

[United Nations Al-Qaida and Taliban
Consolidated List](#)

[U.S. Department of Treasury List of
Specially Designated Nationals and
Blocked Persons](#)

Excluded Parties and Terrorism Searches

Q. How do we know if a potential consultant, staff, vendor or subcontractor is prohibited from receiving U.S. Government funds?

A. As a USAID-funded grantee, you are responsible for making certain that the consultants, staff, vendors and subcontractors you use or contract with are not listed as ineligible suppliers, organizations and individuals that have been formally excluded, blocked or disbarred from receiving U.S. Government (USG) funds. This also ensures that you do not provide material support or resources to any persons or organizations that are involved in terrorism. (For more information, see [Executive Order 13224](#) on terrorism financing.)

Where to Search for Ineligible Suppliers

Before purchasing goods and services or hiring staff and consultants with USG funds, you are required to check the following three sources and document the search results:

- 1. System for Award Management (SAM):** A searchable database of individuals, firms and organizations that, for one reason or another, are prohibited from receiving USG funds, even as a supplier. Using this system to check vendors is part of your responsibility under the Terrorism Financing clause in the Special Provisions section (listed under Attachment A—Schedule) of your Cooperative Agreement: www.sam.gov.
- 2. U.S. Department of Treasury List of Specially Designated Nationals and Blocked Persons;** and
- 3. United Nations Al-Qaida and Taliban Consolidated List**

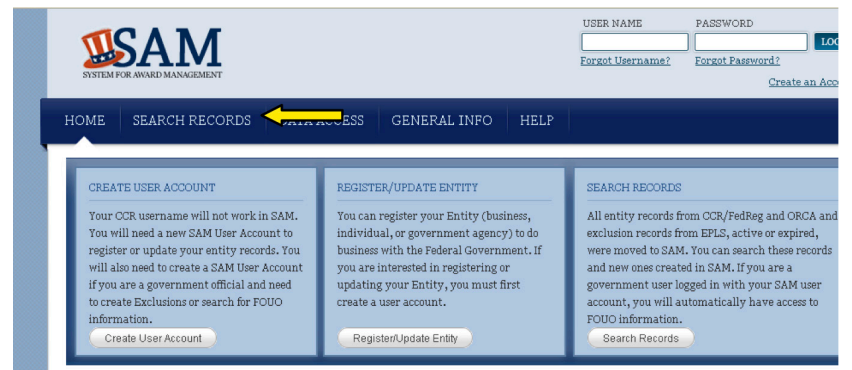
Threshold for Searching

It is up to each organization to determine a threshold at which these searches will be run and documented in payment records. A reasonable threshold might be all purchases above the organization's petty cash transaction limit.

Conducting Your Search

While the search function on each of the three websites mentioned above is slightly different, it is easy to check if your prospective consultant, staff, vendor or subcontractor is ineligible. For example, to begin a search of the SAM (www.sam.gov), click on Search Records in the upper left section of the homepage (see image below).

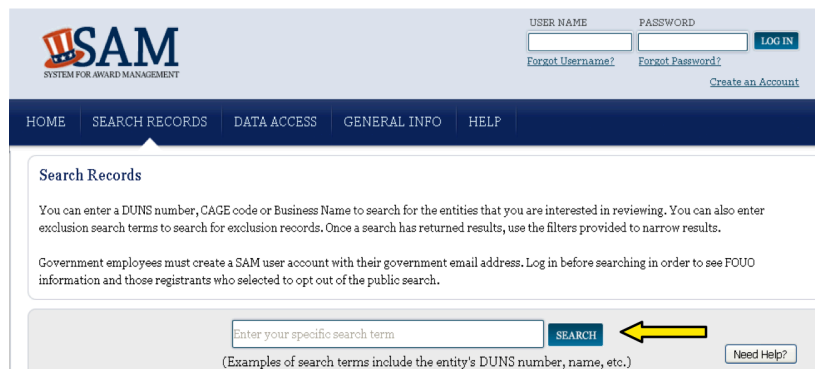
SAM Home Page



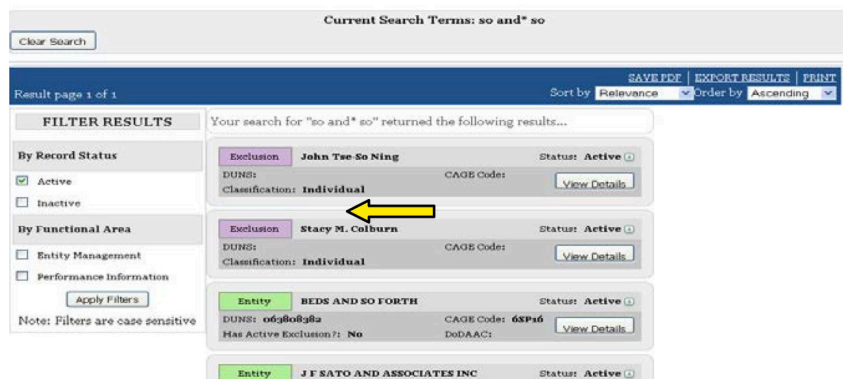
You will then be brought to a new page where you will be able to search the list of banned parties by typing the name of the individual or firm you are investigating into the search bar.

To verify that consultants, staff, vendors and subcontractors are eligible to receive US Government funds, consult www.SAM.gov.

Search Records



If you receive an exact match for the individual or firm you are investigating *with an exclusion tag*, you must find a new consultant, staff member, vendor or subcontractor. If you choose to continue procuring goods and services from this vendor or hiring this individual, the costs will be *unallowable* and you will not be reimbursed by the USG.



If you receive a partial match, and it is clearly not the supplier you are considering, you may want to perform a more precise search. This time, place quotation marks around the name (“name”) of the vendor in which you are interested. For example, if you search for So and So, the database will return a match of John Tse-So Ning in Louisiana. But when you place quotation marks around the name, such as “So and So,” the database returns no results.

If you receive results that you are unsure of, you can go to the Service Desk (<http://www.FSD.gov>) to request additional help.

If you receive no matches or only green “entity” matches, then print the page and keep it in your files in order to document your search. This page shows the term you searched under.

For More Information

For this or other issues of *Implementation Tips*, please visit www.NGOConnect.net. The Web site is a dynamic and interactive portal dedicated to connecting and strengthening CSOs, networks and CSO support organizations worldwide.

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SAM Results Page

Search Results

You can refine your search by entering new search criteria in the search box and using the Search In Results button. If you wish to perform a search use the Clear Search button. Using the Save Search button will allow you to run this search at a later time.

[Important message regarding exclusion searches.](#)

Current Search Terms: FHI* 360*

Clear Search

Result page 1 of 1

SAVE PDF | EXPORT RESULTS

Sort by: Relevance Order by:

FILTER RESULTS

Your search for "FHI* 360*" returned the following results...

By Record Status

☒ Active
☐ Inactive

By Functional Area

☐ Entity Management
☐ Performance Information

Apply Filters

Entity	FHI DEVELOPMENT 360 LLC	Status: Active
DUNS:	968456694	CAGE Code: 6FoD7
Has Active Exclusion?:	No	DoDAAC:
View Details		

Entity	FAMILY HEALTH INTERNATIONAL	Status: Active
DUNS:	067180786	CAGE Code: 3FJZ3
Has Active Exclusion?:	No	DoDAAC:
View Details		

A similar process should be followed for the U.S. Department of Treasury's Specially Designated Nationals and Blocked Persons List and the UN Consolidated List.

