



Subject: Suspension and Debarment Compliance

Effective Date: 05/08/2025

Approved By: Board of Directors

Policy: 2202

Purpose

The purpose of this policy is to ensure that **Springs Public Schools Tennessee (SPSTN)** complies with **CFR § 200.214, CFR part 180, and Executive Orders 12549 and 12689**, which prohibit Federal funds from being awarded to entities or individuals who have been debarred, suspended, or otherwise excluded from participation in Federal assistance programs.

Policy Statement

SPSTN shall not enter into any contracts, subawards, or procurement transactions funded in whole or in part by Federal funds with any party that has been:

- **Debarred**
- **Suspended**
- **Declared ineligible**
- **Voluntarily excluded** from participation in Federal programs

This restriction applies to all Federal awards and subawards received by SPSTN and extends to contractors, subcontractors, and agents engaged in projects funded through those awards.

Scope

This policy applies to all:

- Federal awards and pass-through grants;
- Subawards made by SPSTN to other entities;
- Procurements and contracts funded by Federal programs;
- Employees responsible for grant administration, purchasing, or financial oversight.



Policy Requirements

1. Verification of Status

Before entering into any federally funded agreement, SPSTN shall:

- Verify the eligibility of all potential contractors and subrecipients by searching the **System for Award Management (SAM)** at <https://sam.gov>.
- Document the results of the verification in the procurement or grant file.
- Retain proof of eligibility verification for recordkeeping and audit purposes.

2. Contractual Certifications

SPSTN will require vendors, contractors, and subrecipients to:

- Certify in writing that they are not presently debarred, suspended, or proposed for debarment.
- Acknowledge that any false certification may result in termination of the contract or legal action.

3. Exclusion from Transactions

SPSTN will not conduct business with any individual or organization listed in the **Excluded Parties List System (EPLS)**, now maintained under SAM.gov.

Any discovery of participation with a debarred or suspended entity will trigger immediate review, corrective action, and potential termination of the transaction.

4. Annual Review and Monitoring

The Director of Federal Programs or Designee shall:

- Conduct an **annual review** of internal procedures for debarment compliance;
- Monitor all procurement actions and subaward agreements to ensure continued compliance;
- Train relevant staff annually on debarment and suspension requirements.

Legal Compliance

This policy is issued in compliance with the following authorities:

- **CFR part 180** – OMB Guidelines to Agencies on Governmentwide Debarment and Suspension;



- **CFR § 200.214** – Uniform Guidance requirements for nonprocurement suspension and debarment;
- **Executive Order 12549** – Debarment and Suspension;
- **Executive Order 12689** – Debarment and Suspension;
- **Tennessee Comptroller’s Guidance** for Local Education Agencies (LEAs) managing Federal funds;
- **Tennessee Procurement and Fiscal Procedures** for grant-funded purchases.

Violations and Consequences

Noncompliance with this policy may result in:

- Loss or repayment of Federal funding;
- Termination of contracts or grant agreements;
- Disciplinary action against responsible employees;
- Legal action under Federal or State law.

Policy Review and Amendments

This policy shall be reviewed annually or as laws and regulations are updated. Amendments must be approved by the **SPSTN Board of Education** or designated authority.