

FORM 1-5: UNDERSTANDING SAM.GOV REQUIREMENTS

Under 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Funds*, the methods of complying an excluded party review has been established by the Office of Management and Budget (OMB) which details the process for using the Governmentwide System for Award Management Exclusions (SAM) to determine if entities have been either suspended or debarred.

The chart below is designed to assist anyone working with CDBG funds to determine if an entity will be required to fully register in SAM.gov, use SAM.gov to secure a Unique Entity Identifier (UEI), and be subject to an excluded party review, commonly termed a “debarment check” which is required prior to entering into a written contract or agreement.

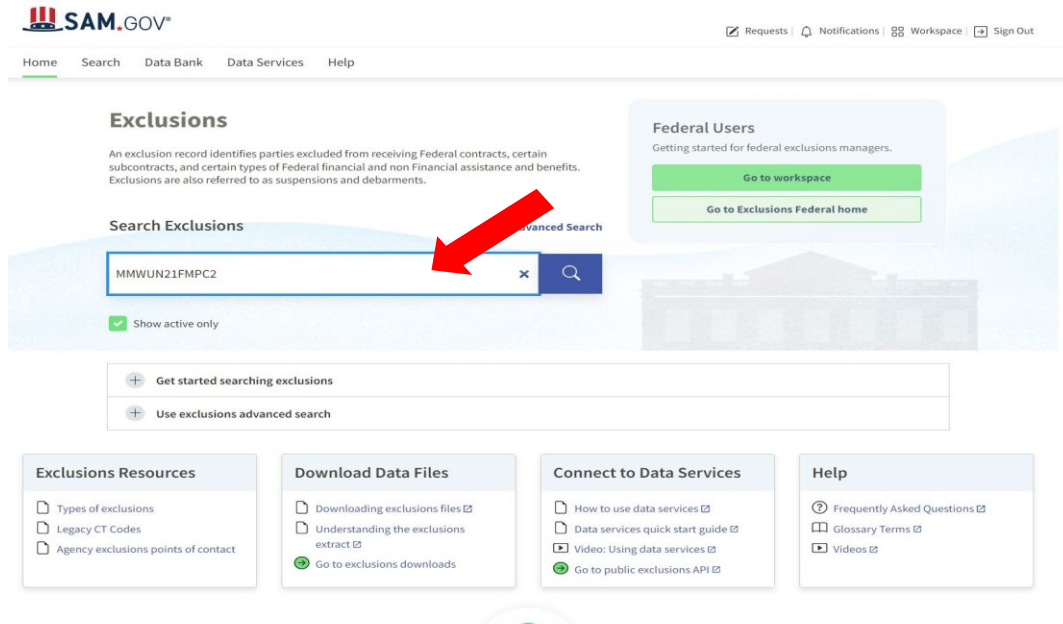
	SAM.gov Requirement			
	Registered	UEI	Debarment Check	
Grantees (Units of Local Government receiving CDBG funds from GOED)	Yes	Yes	Yes	In order for GOED to issue a Grant Agreement, the applicant must be registered in Sam.gov, have a UEI and not be suspended or debarred.
Grantee selected Subrecipients (entities operating a program on behalf of the Grantee)	Yes	Yes	Yes	In order for a grantee to issue a contract for carrying out an eligible activity, the subrecipient must be registered in Sam.gov, have a UEI and not be suspended or debarred.
Contractor (who has been procured by a Grantee, or a Subrecipient)	Yes	Yes	Yes	Prior to executing any contract for services, the contracting entity must verify registration, UEI, and conduct a “debarment check”.
Subcontractor – used by a procured Contractor	No	Yes	Yes	While these entities are not required to “register” in SAM.gov, a UEI must be obtained, and a “debarment check” performed.
Beneficiary (including microenterprises, homebuyers and homeowners)	No	No	No	Some programs may recommend running a “debarment check” on businesses or microenterprises prior to issuing awards, but this is not required by OMB.
Contractor or Subcontractor selected/hired by a beneficiary	No	No	Yes	While these entities are not required to “register” in SAM.gov, a “debarment check” should be performed using a UEI or another identifiable searchable field.
Businesses eligible under 105(a)(17)	Yes	Yes	Yes	Prior to executing any contract for services, the contracting entity must verify registration, UEI, and conduct a “debarment check”.

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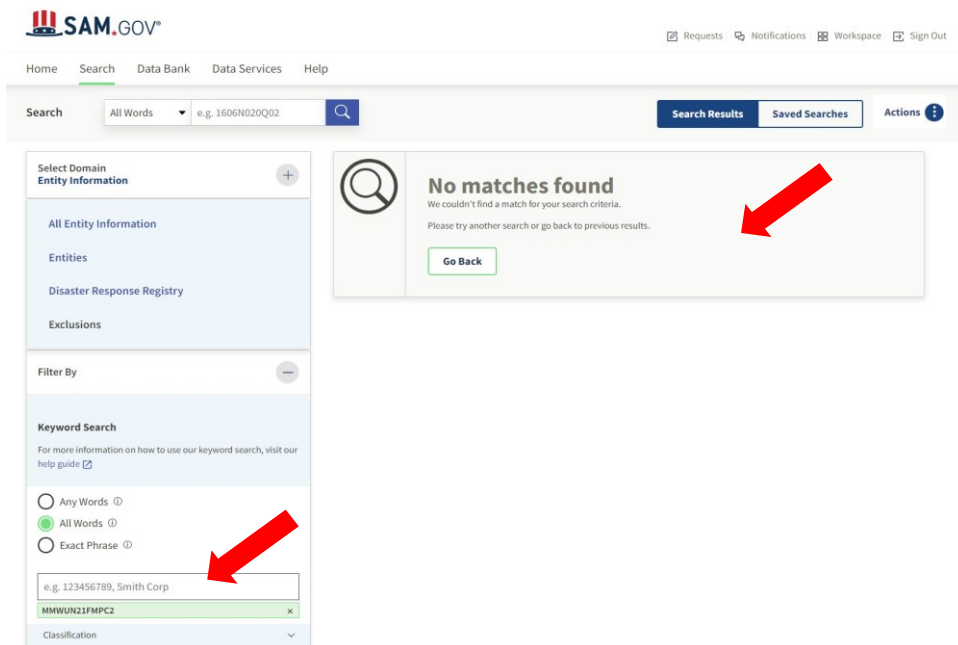
BASIC INSTRUCTIONS FOR DEBARMENT CHECKS

Users are not required to be logged into SAM.gov to conduct an excluded party review (search for “exclusions” – also known as suspension or debarment). Below are the steps to conduct a “debarment check” without logging into the SAM.gov system.

- 1) Access the SAM.gov exclusion webpage: <https://sam.gov/content/exclusions>
- 2) If you have the Unique Entity ID for the entity, type the UEI in the search box.

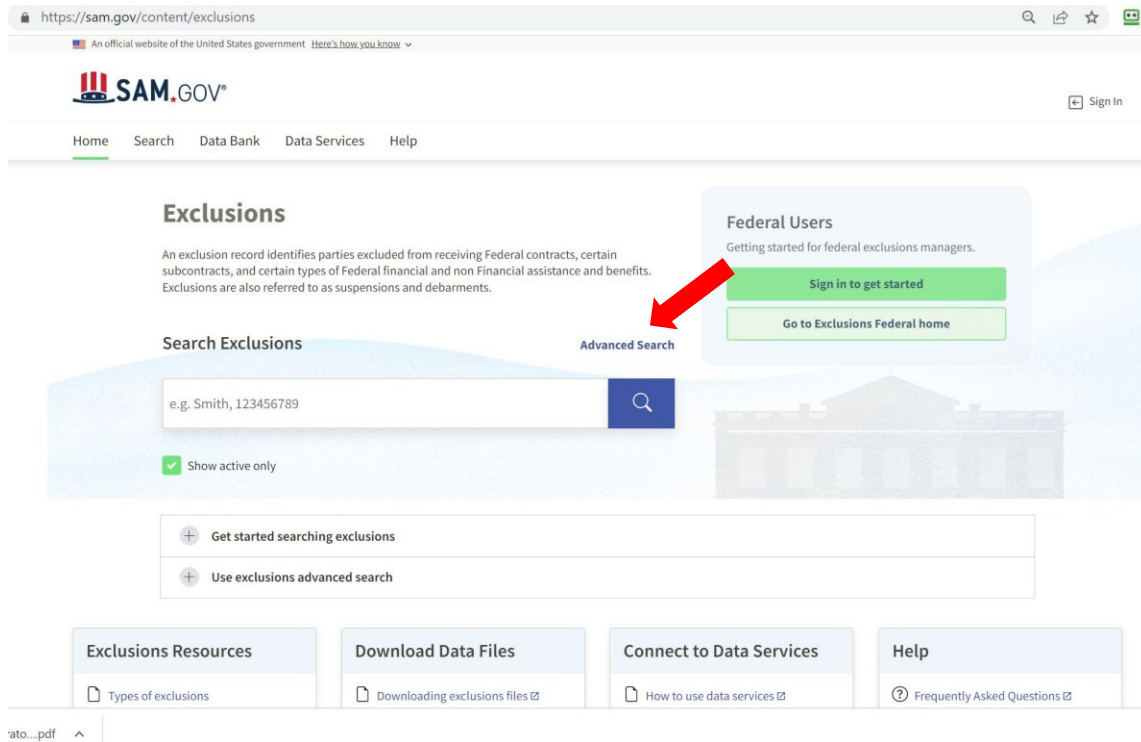


“No matches found” indicates that the entity is not excluded from participation.

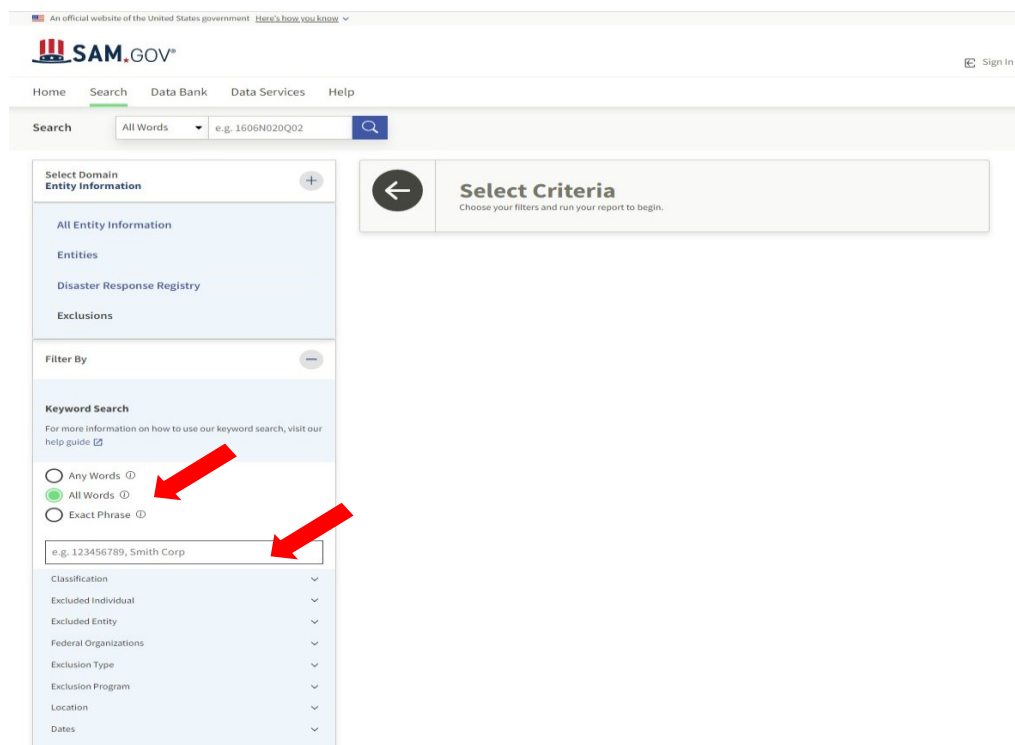


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3) If you do not have the UEI, click on Advanced Search.



4) Choose All Words. Enter the entity name in the search box. For best results, do not type the entire entity name including commas, etc. (Example: "ABC Time Corporation" would be entered as "ABC")



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“No Matches Found” indicates there is no current exclusion for that entity. By typing in the full name as provided, the search appears to have yielded no exclusions for ABC Time Corporation.

The screenshot shows the SAM.gov search interface. On the left, there is a sidebar with 'Select Domain' and 'Entity Information' sections. Under 'Entity Information', there are links for 'All Entity Information', 'Entities', 'Disaster Response Registry', and 'Exclusions'. Below this is a 'Filter By' section with a 'Keyword Search' subsection. The search criteria is set to 'All Words'. The search input field contains 'e.g. 123456789, Smith Corp' and a dropdown menu shows 'ABC Time Corporation' selected. To the right, a search results box displays 'No matches found' with a magnifying glass icon and a 'Go Back' button. A red arrow points to the search input field, and another red arrow points to the 'No matches found' message.

By typing in only a portion of the name and reviewing all results, it is evident that the company IS excluded from participation in a Federally assisted project. **NOTE: Comparison of company details such as address should be verified to ensure they are the same entity.**

The screenshot shows the SAM.gov search results page. The search criteria is 'All Words' and the search input field contains 'e.g. 123456789, Smith Corp'. The search results are displayed in a table with columns for 'Unique Entity ID', 'CAGE Code', 'Physical Address', and 'Exclusion'. The results are sorted by 'Relevance'. A red arrow points to the search input field, and another red arrow points to the search results table.

Unique Entity ID	CAGE Code	Physical Address	Exclusion
ABC Active Q298PQJCFU1	(Blank)	110 Darien Hwy., Brunswick, GA 31520 USA	Exclusion Classification Firm Activation Date Feb 21, 1997 Termination Date Indefinite
ABC Diagnostic Active QBCDL6J6WS1	(Blank)	20284 Old Cutler Rd., Miami, FL 33257 USA	Exclusion Classification Firm Activation Date Apr 30, 1998 Termination Date Indefinite
ABC Time Corp. Active SFGMJ98KNL6	(Blank)	262 West 23rd St., 2nd Floor, New York, NY 10001 USA	Exclusion Classification Firm Activation Date Apr 26, 1996 Termination Date Indefinite
ABC Eureka Medical Rentals Active R4EVP8MZN2K88	(Blank)	1800 West 49th St., No. 115, Hialeah, FL 33016 USA	Exclusion Classification Firm Activation Date Sep 21, 2000 Termination Date Indefinite
ABC Active Q298PQJCFU1	(Blank)	110 Darien Hwy., Brunswick, GA 31520 USA	Exclusion Classification Firm Activation Date Nov 7, 1996 Termination Date Indefinite
ABC Diagnostic Active QBCDL6J6WS1	(Blank)	20284 Old Cutler Rd., Miami, FL 33257 USA	Exclusion Classification Firm Activation Date Jan 20, 1998 Termination Date Indefinite
ABC Eureka Medical Rentals Active R4EVP8MZN2K88	(Blank)	1800 West 49th St., No. 115, Hialeah, FL 33016 USA	Exclusion Classification Firm Activation Date May 18, 2000

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- 1) When a search yields an Exclusion for an entity, the Grantee may not enter a contract or written agreement with that entity.
- 2) When a search yields the “No matching records”, Grantees should print a hard copy or an electronic screenshot that clearly shows the search parameters used and “No matching records” to be maintained for GOED monitoring.
- 3) Grantees must ensure that **a clause is included in ALL CDBG contracts and written agreements that an excluded party review will be conducted, and the contractor is not knowingly excluded.** This is particularly important with “no matches found” results, but also applies to all contracts and written agreements.
- 4) Grantees must do “debarment check” prior to contract execution - even if the entity has not received a UEI yet.
- 5) Grantees may not disburse funds to an entity until the UEI is obtained, when applicable. See above chart.