



UNIVERSITY POLICIES

Title: Debarment and Suspension Policy for Grants
Effective Date: August 1, 2025
Issuing Authority: Provost
Policy Contact: Senior Vice Provost for Research
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Purpose

The purpose of this policy statement is to set forth the University's policy and procedures with regard to ensuring Mercer does not participate in covered transactions with persons or parties who are debarred or suspended or who are voluntarily excluded from participation in federal projects.

Scope

These policies and procedures apply to employees with federal grants.

Exclusions

Mercer Engineering Research Center

Definitions

For all federal grants and contracts (excluding awards for Federal Financial Aid), the following definition(s) will apply:

Covered Transaction: any of the following non-procurement or procurement transactions are subject to these provisions:

- Non-procurement transactions – All of the following are considered covered transactions:
 - Grant
 - Cooperative Agreement
 - Scholarship
 - Fellowship
 - Contracts of Assistance
 - Donation Agreements

Non-procurement transactions do not have to involve the transfer of federal funds.

- Procurement transactions involve the purchase of goods or services with federal funds. A contract for goods or services is considered a covered transaction if any of

the following apply:

- The contract is awarded by a participant in a covered non-procurement transaction, and the amount of the contract is expected to equal or exceed \$25,000.
- The contract requires the consent of the federal awarding agency.
- The contract is for federally required audit services.

Policy Statement

In the event that Mercer will participate in a covered transaction as defined above as part of its federally sponsored agreement, the Office of Research and Sponsored Programs will ensure that the subrecipient(s) and/or vendor(s) are not debarred, suspended, or voluntarily excluded prior to issuing a subaward or executing an agreement for goods and services in accordance with 2 CFR Part 180.

If Mercer University has a subrecipient relationship with another organization or institution under a federally sponsored award where Mercer is the prime recipient, Mercer's Subaward Agreement will be issued and include the terms of the prime award. Attachment 5 of the subaward agreement includes additional certifications and assurances to include a certification regarding debarment and suspension. By signing the subaward agreement, the subrecipient agrees to comply with 45 CFR part 76 Appendix B and certifies that neither the organization nor its principals are presently debarred, suspended, proposed for debarment declared ineligible, or voluntarily excluded from participation in this transaction by any federal department or agency.

If Mercer intends to procure goods or services equal to or greater than \$25,000 as part of a federally sponsored award, the Office of Research and Sponsored Programs must check the System for Award Management (SAM.gov) to determine if the vendor is listed prior to approving the requisition. A search can be conducted on the SAM.gov website: <http://sam.gov>. A screen print of the search should be printed and maintained in the grant file for documentation of the verification.

A screen print of the search will be printed and maintained as an attachment on the requisition if the vendor is listed on sam.gov or a note to advise sam.gov was checked with no exclusions found.

Additional Resources

45 CFR Appendix B to Part 76: <https://www.govinfo.gov/app/details/CFR-2003-title45-vol1/CFR-2003-title45-vol1-part76-appB/summary>