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Strengthening Northwestern's Research Infrastructure – New Debarment Screening Practices Begin January 1, 2017

Northwestern is committed to excellence in the conduct of research, including adherence to compliance requirements. The Federal Government and an increasing number of non-federal sponsors (such as states, nonprofits, corporations and foreign governments) expressly prohibit their funding from supporting or reimbursing debarred, suspended or excluded entities. ^[1] The suspension and debarment requirement establishes that certain entities or individuals are prohibited from participating in or receiving federal assistance for various reasons, including prior mismanagement of funds, student loan defaults, or previous non-compliance with laws and regulations. This prohibition may be temporary (suspension) or indefinite (debarment; until specifically allowed by the government). On an ongoing basis, governmental entities publish various lists of federally debarred, suspended and/or excluded entities, also known as restricted party lists. These entities may be organizations or individuals.

As a federal and non-federal grantee/contractor, Northwestern accepts responsibility for determining that it is not doing business with debarred, suspended or excluded organizations or individuals. To strengthen its culture of research compliance, Northwestern will begin a more comprehensive process to fulfill its obligation to ensure that it does not engage individuals or entities that have been debarred from sponsored project activity. Northwestern has already implemented a process to review, or “screen,” entities such as vendors. It is now implementing a process related to reviewing or screening individuals paid from sponsored awards.

What actions are required from the research community?

No additional initial effort is required from principal investigators or other research personnel related to the screening process. Additional language will be added in the proposal award system (InfoEd) to remind principal investigators of their responsibilities associated with debarred, suspended and/or excluded individuals and entities affiliated with their sponsored proposal, i.e., if a proposal is awarded, **principal investigators and administrators should alert individuals on their awards about the screening process.**

A communication will be sent to the OSR listserv and the research community can obtain additional information about the process at the following link:

<https://research.northwestern.edu/policies>. The Office of Financial Operations will begin screening individuals supported on sponsored awards for new awards received as of January 1, 2017.

How will the screening process work?

When a proposal is awarded, individuals paid or reimbursed from sponsored awards will be screened by the Office of Financial Operations against the federal databases using *Visual Compliance*.

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Visual Compliance is an electronic platform that allows for the efficient and dynamic screening of an entity or individual across different--and continuously updated--debarred, suspended and/or excluded party lists. Northwestern currently uses *Visual Compliance* to screen all third party individual payees and entities with which it conducts sponsored research, both incoming and outgoing support, which includes sponsors, subcontractors and vendors.

What happens if a name matches against a list?

Personnel within the Office of Financial Operations, the Office for Research, and the Office of Human Resources will confirm whether the organization or individual is the same as the entity on the restricted party list. Due to the commonality of names, records may appear as a match; however, actual matches are rare. Any course of action will depend on the reason for the inclusion on a restricted party list. The principal investigator, department, school and central administrators will be engaged to determine the best course of action based upon facts and circumstances as presented.

Who do I contact if I have questions about this process?

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[1] The statutory basis for the requirement is outlined in 48 C.F.R. 9.4, Debarment, Suspension, and Ineligibility, which states, in part: "Contractors debarred, suspended, or proposed for debarment are excluded from receiving contracts, and agencies shall not solicit offers from, award contracts to, or consent to subcontracts with these contractors, unless the agency head or a designee determines that there is a compelling reason for such action (see 9.405-2, 9.406-1(c), 9.407-1(d), and 23.50(e)). Contractors debarred, suspended or proposed for debarment are also excluded from conducting business with the Government as agents or representatives of other contractors." Additional details are noted in Executive Order 12549 and Federal Acquisition Regulations (FAR) 52.209-5.