Sanction Checks – Potential Match Verification Procedures for Vendors

1. **Name/State Review** – Compare University vendor's full name to the name of the individual/business name identified as a "high level" potential match in the vendor on-line searchable database system (VOD) "exclusion record report" (e.g. "James E. Brown" listed as potential match to "John L. Brown" on the VOD report for an individual vendor, or "Louis Plumbing, Inc." listed as a potential match for "Louis Medical Supplies, Inc." on the VOD report for a business vendor). If a reasonable likelihood of a match exists, then proceed to step #2.

2. **Federal Tax Identification Number (TIN)** – Access respective federal agency's on-line search system for TIN verification (Social Security Number, or SSN, may apply for individual vendors). If TIN is not available, then proceed to step #3.

3. **Full Address Review** – perform alternative match procedures as follows:

   a. Address – Compare the city and state address via the respective federal agency online record in which the potential match individual/company was debarred/ suspended/excluded with the address on file for the University's vendor, and proceed to step 4.b.

   b. The final step of vendor address verification a search of the Central Contractor Registration (CCR) website at https://www.bpn.gov/CCRSearch/Search.aspx. A CCR search of the University vendor name will result in a "CCR Detail Search Results" report that includes <u>all</u> addresses (or "points of contact") on file in the CCR registration for the vendors registered to do business with the federal government. Compare the University vendor addresses per the CCR report, if any, to the address of the potential match. (*See details of CCR application on Page 6 of the "Helpful Hints" section below.*) If a reasonable likelihood of a match continues to exist after completion of steps 3. a. and 3. b., then proceed to step #4.

4. **Certification Form** - The University department or administrative office performing the sanction check verification procedures will request that a "Sanction Check Certification" form be signed by the vendor attesting that the individual/company in question has never been excluded, suspended, debarred, or otherwise deemed ineligible to participate in federal and/or state programs. In addition, the vendor will be asked to confirm their TIN numbers on file in the University vendor system. The certification forms will be maintained in respective search verification files maintained in the ICO. (See Procedures **#PR002 Attachment B-1**).

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TEMPLATE # 7

HELPFUL HINTS PER FEDERAL AGENCY ONLINE RECORD SYSTEM:

Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE)

- Link to LEIE on-line search system: http://oig.hhs.gov/fraud/exclusions.asp

- Perform TIN/SSN searches on the LEIE search system by copying/pasting the potential match's **last** and **first name** from the VOD "exclusion record report" report to the LEIE's online name search screen for vendors who are **individuals** to eliminate the risk of typographical errors. In addition, perform TIN/SSN searches on the LEIE search system by copying/pasting the potential match's **business name** from the VOD "Exclusion record report" report to the LEIE's online name search screen for vendors who are **firms/companies** to eliminate the risk of typographical errors. *(e.g. James L. Brown, an individual, should be entered in the Last Name (Brown) and First Name (James) search fields, while Brown's Pharmacy, should be entered in the Business Name search fields at http://exclusions.oig.hhs.gov).*

- The LEIE search system for TIN/SSN verification will include a notation of "N/A" if the OIG does not have record of TIN/SSN on file for respective individual.

- The LEIE record may include a unique physician identification number (UPIN) six-place alpha numeric identifier (assigned to physicians by Medicare through Sept 2006) or a National Provider Identifier (NPI) that is a recently assigned unique 10-digit identification number issued to health care providers in the U.S. by the Centers for Medicare and Medicaid Services. The UPIN or NPI can be used to assist in verification procedures for physicians or all health care providers, respectively.

- LEIE FAQ's link: http://oig.hhs.gov/fraud/exclusions/faq.asp.

- It is noted in the LEIE FAQ's that if the DOB, TIN/SSN, or UPIN is not included in the LEIE, then it is not available from the OIG.

- The VOD "Exclusion record report" includes a link to an OIG "Sanction Type" code. LEIE Direct Link: http://exclusions.oig.hhs.gov/ExclusionTypeCounts.aspx

General Services Administration's (GSA) Excluded Parties List System (EPLS)

- EPLS online search system: https://www.epls.gov/. (*A link to an "EPLS Public Users Manual" is available in the "Resources" section on this EPLS home page to assist in performing searches.*)

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- Perform TIN/SSN exact name match searches on the EPLS by copying/pasting the potential match vendor's name from the VOD "Exclusion record report" report to the EPLS system to eliminate the risk of typographical errors.

- The EPLS "Exact Name and SSN/TIN" Search Results screen will include a notation of "SSN/TIN is Unknown" if the GSA does not have record of SSN/TIN on file for respective individual or entity.

- A "Partial Name" search will result in an EPLS report screen that allows for **address verification via street address** for individual/entities. (e.g. Brown, James L. address information provided includes City, State and Zip [Oneonta, AL 35121] and provides a box for input of street address to verify match for respective individual).

- GSA EPLS FAQ's: https://www.epls.gov/epls/jsp/FAQ.jsp

- It is noted in the EPLS FAQ's under "Is the EPLS the same or similar as the OIG….:" that the EPLS database is the official government-wide system of records or debarments, suspensions, and other exclusionary actions and data is received and maintained by federal debarring/excluding agencies only. A federal agency may maintain an internal agency system similar to EPLS; however, the EPLS is not a subset of or a supplement to any other system. GSA cannot guarantee the accuracy of data provided by other systems; thus, GSA officials do not respond to inquiries retrieved from other systems. Users obtaining data from systems other than the official GSA EPLS database should contact the owner of that system for data verification and support.

- It is noted in the EPLS FAQ's that the "***Action Date***" is the effective date of the exclusion and the "***Termination Date***" is the date the action will be removed from the current list of exclusions and placed in the Archive list.

- It is noted in the EPLS FAQ's under "How do I confirm or obtain more information on a listed individual or firm?" that if a match is found and further verification is needed beyond what the record information provides, users should contact the federal agency that took the action against the listed party. Agency points of contacts names and telephone numbers are available by the on the "***Agency Contacts***" link under the category labeled "Agency and Acronym Info." (Direct Link: https://www.epls.gov/epls/jsp/POC.jsp)

- The VOD "exclusion record report" includes a link to the GSA "***Cause and Treatment*** (CT) *code*" that references the reason why the individual or entity has been debarred. EPLA Direct Link to CT code list: http://www.epls.gov/epls/jsp/CTCodes.jsp?type=nonproc

- An alphabetical listing of acronyms used in the EPLS is available at https://www.epls.gov/epls/jsp/acronyms.jsp

TEMPLATE # 7

U.S. Food and Drug Administration (FDA) Debarment List and Disqualified/Totally Restricted List for Clinical Investigators

- FDA Lists: http://www.fda.gov/ora/compliance_ref/bimo/dis_res_assur.htm

- The FDA Lists do not include DOB or TIN/SSN information.

NOTE: The University's Office of Research Integrity Director should be consulted if assistance is necessary in the verification of an individual or entity on the FDA Lists.

Office of Foreign Assets Control's (OFAC) Specially Designated Nationals/Terrorist (SDN) List

- SDN List: http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx

- SDN FAQ's link: http://www.treasury.gov/resource-center/faqs/Sanctions/Pages/default.aspx

- Under the "General Questions" section of the SDN FAQ's, the answers to "When should I call OFAC's compliance hotline?" include the following:

  - *Review the complete name(s) listed on the SDN List against the name of the potential match individual/business to determine how much of the SDN's name is matching. If just one of two or more names match (e.g. just the last name), then it is not a valid match.)*
  - *Compare the complete applicable SDN List entry with all the information you have on the matching name in your transaction. An SDN entry often will have, for example, a full name, address, nationality, passport, tax ID or cedula number, place of birth, date of birth, former names or aliases.*

- Under the "General Questions" section of the SDN FAQ's, the answers to "What do I do if I have a match to the SDN list" states the following:

  - *If you have checked a name manually or by using software and find a match, you should do a little more research. Is it an exact match, or very close? If you customer located in the same general area as the SDN? If not, it may be a "false hit." If there are a number of similarities, contact the OFAC hotline at 1-800-540-6322 for verification.*

- It is noted in Section 2 of the EPLS Public Users Manual found at https://www.epls.gov/epls/jsp/userManual.jsp that "While the OFAC List has been fully integrated in EPLS for access at a single location, it does not replace the List available at the OFAC websites."

NOTE: The University's Office of Industry Contracts Director should be consulted if assistance is necessary in the verification of an individual or entity on the OFAC SDN List.

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U.S. Department of Commerce (DOC), Bureau of Industry and Security (BIS)

Export- Related Restricted, Denied, and Blocked Persons Lists:

1. **Denied Persons List: -** http://www.bis.doc.gov/dpl/thedeniallist.asp

   • The DOC maintains this list of individuals and entities that have been denied export privileges. It is illegal to enter into any transactions that would violate their denial orders.

   • The BIS provides a web-based "Denied Persons List Inquiry Form" at https://www.bis.doc.gov/forms/dplinquiryform.html.

2. **Entity List:** http://www.bis.doc.gov/entities/default.htm

   • A list of parties whose presence in a transaction can trigger a license requirement under the EAR. The list specifies the license requirements that apply to each listed party. These license requirements are in addition to any license requirements imposed on the transaction by other provisions of the EAR.

   • The China section of the current U.S. Entity List is annotated by the Wisconsin Project to increase its usefulness as a screening tool for exporters – see http://wisconsinproject.org/pubs/reports/2008/entitylist.htm

3. **Unverified List:** http://www.bis.doc.gov/enforcement/unverifiedlist/unverified_parties.html

   • A list of parties where BIS has been unable to verify the end-user in prior transactions. The presence of a party on this list in a transaction is a "Red Flag" that should be resolved before proceeding with the transaction – See BIS Guidance at http://www.bis.doc.gov/complianceandenforcement/knowyourcustomerguidance.htm.

NOTE: The University's Office of Industry Contracts Director should be consulted if assistance is necessary in the verification of an individual or entity on the DOC Lists.

U.S. State Department (DOS), Directorate of Defense Trade Controls (DDTC)

Munitions Export -Related Restricted, Denied, and Blocked Persons

1. **Debarment List:** http://pmddtc.state.gov/licensing/debar.html

   • A list compiled by the DOS of parties (individuals and entities) who have been convicted of violating or conspiracy to violate the Arms Export Control Act (AECA). Accordingly, they "statutorily" prohibited from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR.

- An Individual's or Entity's name and reference to specific Federal Register citation (*e.g. 76 Federal Register 10033, March 5, 2002 for A&C International Trade, Inc.*) only are provided on this list. The respective Federal Register should be reviewed to obtain additional information, including address.

2. **List of Administratively Debarred Parties:** at
    http://pmddtc.state.gov/licensing/debar_admin.html

- List of parties debarred on a case-by-case basis for the resolution of individual enforcement proceedings for violations of the AECA and ITAR.

- An Individual's or Entity's name and reference to specific Federal Register citation (*e.g. 70 Federal Register 35333, June 17, 2005 for Hughes Network Systems (Beijing) Co. Ltd*.) only are provided on this list. The respective Federal Register should be reviewed to obtain additional information, including address.

NOTE: The University's Office of Industry Contracts Director should be consulted if assistance is necessary in the verification of an individual or entity on the DOS Lists.

Kentucky Cabinet for Health and Family Services, Department for Medicaid Services (DMS) List of Excluded Providers

- KY DMS List: http://chfs.ky.gov/dms/provider.htm *(See link to "Excluded/termed provider list" in "Program Integrity" section at bottom of page.)*

- This pdf format list contains First Name, Last Name or Practice Name, NPI #, License #, and Termination Date.

Central Contractor Registration (CCR)

Central Contractor Registration (CCR) is the primary registrant database for the U.S. Federal Government. CCR collects, validates, stores, and disseminates data in support of agency acquisition missions, including Federal agency contract and assistance awards. Please note that the term "assistance awards" includes grants, cooperative agreements and other forms of federal assistance. Whether applying for assistance awards, contracts, or other business opportunities, all entities are considered "registrants."

Both current and potential federal government registrants are required to register in CCR in order to be awarded contracts by the federal government. Registrants are required to complete a one-time registration to provide basic information relevant to procurement and financial transactions. Registrants must update or renew their registration at least once per year to maintain an active

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status. In addition, entities (private non-profits, educational organizations, state and regional agencies, etc.) that apply for assistance awards from the Federal Government through Grants.gov must now register with CCR as well. *(Note: There are exceptions to the CCR registration requirement. See https://www.bpn.gov/ccr/CCRPol.aspx for further details.)*

- Link to online CCR search system: https://www.bpn.gov/CCRSearch/Search.aspx.

- CCR FAQ's: Link: https://www.bpn.gov/ccr/FAQ.aspx

- Use the "**Advanced Search**" screen located for vendor potential match searches.

  Note: The CCR's search filter is very sensitive and caution should be used in performing searches (e.g. Input of "Brown, James L. will result in "no records found;" although a record for Brown, James L (no period after middle initial) does exist.) Accordingly, enter only partial names (e.g. "Brown" or "Brown, James") to ensure all applicable CCR records are shown.

- A CCR search of a potential match vendor name will result in a "CCR Detail Search Results" report that includes all addresses (or "points of contact") on file in the CCR registration for the specific vendor, in addition to various classifications of goods/services provided by the registrant. The address on file for the University vendor should be reviewed against all addresses on file in the CCR for the respective potential match vendor.

- The CCR Search Screen (located at https://www.bpn.gov/CCRSearch/Search.aspx) includes the following statement "As of *July 30, 2008* release (4.08.2), CCR – registered vendors may elect **not** to display their registration in the CCR/FedReg Public Search. Federal government users may still view all registrations from a .mil, .gov, or .fed us domain."

- The use of the CCR was recommended as a final GSA/EPLS address verification procedure by Dorsena Bowen (202-208-1568), GSA Point of Contact per 12/11/07 ICO phone call to Ms. Bowen.