

EXCLUDED PARTY SEARCHES/ELIGIBILITY—PROCESS GUIDANCE

In accordance with Executive Order 13224, FHI 360 must not engage in transactions with, or provide resources or support to, individuals and organizations associated with terrorism, including those individuals or entities that appear on the Specially Designated Nationals and Blocked Persons List maintained by the U.S. Treasury or the United Nations Security designation list. Additionally, FHI 360 must not transact or conduct business under this award with any individual or entity that has an active exclusion on the System for Award Management (SAM). The list contains those individuals and entities that the U.S. Government has suspended or debarred based on misconduct or a determination by the U.S. Government that the person or entity cannot be trusted to safeguard U.S. Government funds. Suspended or debarred entities or individuals are excluded from receiving any new work or any additional U.S. Government funding for the duration of the exclusion period. Failure to follow these procedures may result in 1) disallowed costs; 2) termination of the transaction, or subject FHI 360 to debarment and or suspension procedures.

Accordingly, FHI 360 must complete an eligibility screening to ensure that an entity under consideration to receive a contract (subaward), consultant agreement, or any other type of purchase of commercial goods or services is not an excluded party as defined above. Note that eligibility screening is required for all subawards and consultants regardless of value. Eligibility screening for the purchase of commercial goods and services is done in accordance with thresholds indicated in Purchasing Guidance and Directives.

At a minimum, these searches should be performed through the public search engines outlined below:

Specially Designated Nationals and Blocked Persons (OFAC)	https://sanctionssearch.ofac.treas.gov/
United Nations Security designation list	https://scsanctions.un.org/search
System for Award Management (SAM)	https://www.sam.gov/SAM/

Instructions on how to conduct and document the searches can be found in the [Anti-Terrorism and Debarment Search Guide](#).

FHI 360 employs reasonable methods to avoid contracting with individuals and organizations that have been disbarred, suspended or excluded by the US and foreign governments with whom have been determined to support terrorist activities.

Regardless of where payment is made, the individual who signs* the contract (subaward), consultant agreement, or purchase orders for goods and services) is responsible for ensuring the searches have been performed and are saved in the file.

If initial screening results show the prospective individual/organization as an excluded party, CMS or Procurement should be contacted and will conduct a more rigorous screening. If the screenings are being conducted by Regional/Country Office or project staff, CMS or Procurement should be consulted if results show individual/organization as an excluded party. If CMS or Procurement determines the individual/organization is ineligible, the requestor will be notified. Results are documented and retained as part of the subaward/PO file.

*Note that the signing of any contract (subaward), consultant agreement, or purchase order that obligates FHI 360 funds must only be done by staff that have been delegated the authority through the Director of Administration or Policy 01027, Authority to Obligate FHI 360.