



Policy Name: SAM.gov Exclusion
Verification Requirement

Policy Number: Administrative Policy
03.40.07.03

Date: May 07, 2026

Review Date: May 07, 2029

Approved by Willie L. Todd, Jr., Ph.D.
President and CEO

A handwritten signature in blue ink, appearing to read 'Willie L. Todd, Jr.', is written over a horizontal line.



SAM.gov Exclusion Verification Requirement Policy

Policy Title: SAM.gov Exclusion Verification Requirement
Policy Type: Administrative
Policy Number: 03/40/07/03
Approval Date: May 07, 2026
Responsible Office: Office of Sponsored Research and Title III Programs
Responsible Executive: VP of Finance and Administration

Applies to:

All faculty, staff, Activity Directors, and administrators involved in procurement using federally funded sources (including Title III, federal grants, and subawards).

POLICY STATEMENT

The purpose of this policy is to maintain compliance with federal regulations. The policy mandates formal eligibility verification for all vendors involved in **federally funded transactions exceeding the micro-purchase threshold**. Such measures ensure that the organization does not engage with parties currently excluded from receiving federal awards

This verification must be completed through the **System for Award Management (SAM.gov) Exclusions Search** and **documented prior to purchase approval or contract execution**.

Failure to comply with this requirement may result in disallowed costs, audit findings, and institutional liability under federal regulations, including **2 CFR Part 200 (Uniform Guidance)**.

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DEFINITIONS

SAM.gov (System for Award Management): Is the official free U.S. government website used to manage federal contracting, registration, and assistance. It enables businesses to register to bid on contracts, obtain a Unique Entity Identifier (UEI), search for contract opportunities, and find federal grants. It also hosts data on federal awards, exclusions, and wage determinations.

Exclusion Verification Requirements: Mandatory processes ensuring employees, vendors, and contractors are not prohibited from participating in federal programs (e.g., Medicare/Medicaid). Organizations must screen against the OIG List of Excluded Individuals and Entities (LEIE), SAM.gov, and state lists to avoid hefty civil monetary penalties.

Micro Purchased Threshold: The micro-purchase threshold is defined in accordance with federal guidelines under 2 CFR §200.320 and is subject to change.

- Current threshold: **\$10,000** (or most current federal limit)
- This policy applies to all purchases exceeding this amount

CONTACT(S)

The Office of Sponsored Research and Title III Programs officially interprets this policy and is responsible for revisions required by institutional policy processes. Questions regarding this policy should be directed to the Office of Sponsored Research and Title III Programs or the Office of Finance and Administration.

STAKEHOLDER(S)

Office of Finance and Administration

Office of Sponsored Research and Title III Programs



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POLICY CONTENTS

Step 1: Determine Applicability

- Confirm the purchase is funded in whole or in part by federal funds
- Confirm that the total purchase amount exceeds the micro-purchase threshold.

Step 2: Conduct SAM.gov Exclusion Search

- Navigate to: <https://sam.gov>
- Select **“Search Records”** → **“Exclusions”**
- Enter:
 - Vendor legal name (preferred), or
 - UEI (Unique Entity Identifier), if available
- Review results to confirm:
 - Vendor is **NOT listed as excluded (debarred, suspended, or ineligible)**

Step 3: Print and Document

Print or save as PDF the **SAM.gov search results page**

Ensure documentation includes:

- Vendor name
- Date of search
- Search results (clear indication of “No exclusions found”)

Step 4: Attach to Procurement File

Upload or attach the SAM.gov verification to:

- Docusign requisition packet
- Purchase request documentation
- Contract file (if applicable)



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Step 5: Approval Verification

The Office of Sponsored Research and Title III Programs will:

- Verify that SAM.gov documentation is included
- Return incomplete requisitions without approval

Roles and Responsibilities

Contracts and Grants Accountant

- Conduct SAM.gov search
- Ensure documentation is complete and attached

OSPR (Title III Office)

- Review and enforce compliance
- Provide guidance and training

Finance Office

Ensure no payment is processed without required documentation

Related Regulations

2 CFR Part 200 – Uniform Administrative Requirements

2 CFR §200.213 – Suspension and Debarment

2 CFR §200.320 – Procurement Standards

Best Practice Guidance

Perform SAM.gov verification **on the same day** as purchase request

Re-verify vendors for recurring or long-term contracts periodically

Maintain organized digital files for audit readiness

Policy Enforcement

This policy is **mandatory** and effective immediately. No federally funded purchase exceeding



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the micro-purchase threshold will be approved without documented SAM.gov verification.

COMPLIANCE

OSPR will conduct periodic reviews of procurement files. Missing SAM.gov verification will be flagged as **non-compliance**.

Repeated violations may result in:

- Delayed approvals
- Revocation of purchasing privileges
- Required retraining

PUBLICATION

This policy will be published on the Talladega College Website, Office of Sponsored Research and Title III Programs, and Office of Finance and Administration communications.

REVIEW SCHEDULE

Next Scheduled Review: May 07, 2029

Approval By: May 07, 2026

Revision History:

RELATED DOCUMENTS

SAM.gov Exclusion Search printout or PDF with Vendor name and identifying information.

FORMS

DocuSign Forms

Requisition Forms

Vendor Verification Forms