

**PROCUREMENT, SUSPENSION AND DEBARMENT**

- I.** Federal regulations stipulate that Talbot County Public Schools is prohibited from entering into a “covered transaction “ (i.e. a transaction paid for with federal funds) with a vendor or subgrantee that has been suspended or debarred from receiving federal funds. Vendors (companies or individuals) can be suspended or debarred when they have not fulfilled their obligations to the federal government in a previous situation.
- A. The covered transaction provision applies to TCPS in two key situations:
1. Any time TCPS would award a subgrant to another party and/or
  2. When TCPS contracts with a vendor and the amount of the contract is expected to equal or exceed \$25,000 during a 12-month period.
- II.** It is the responsibility of the Talbot County Public Schools Federal Grant Program Manager to confirm the suspended or debarred status of vendors or subgrantees before entering into a covered transaction with them. If a grant manager expects to make multiple purchases with a vendor that will total \$25,000 or greater, the policy is also in effect.

The federal grant program manager will utilize the federal Excluded Parties List System (EPLS) to document the suspended or debarred status of potential vendors or subgrantees. Printed documentation from the EPLS will be kept in the Finance Department grant files to verify that the rules for suspended and debarred vendors has been fulfilled.

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