SAVE FORM

SELF ASSESSMENT OF INTERNAL CONTROL

Form N-4

Compliance Requirement

Procurement and Suspension and Debarment

Department of _____ ☐

Fiscal Year Ending _____ NA-_____

		Yes	No	N/A	Comments
	Control Objectives				
	To provide reasonable assurance that procurement of goods and services are made in compliance with the provisions of the A-102 Common Rule or OMB Circular A-110, as applicable, and that covered transactions (as defined in the suspension and debarment common rule) are not made with a debarred or suspended party.				
	Control Environment				
1	Existence and implementation of codes of conduct and other policies regarding acceptable practice, conflicts-of-interest, or expected standards of ethical and moral behavior for making procurements.				
2	Procurement manual that incorporated Federal requirements.				
3	Absence of pressure to meet unrealistic procurement performance targets.				
4	Management's prohibition against intervention or overriding established procurement controls.				
5	Board or governing body oversight required for high dollar, lengthy, or other sensitive procurement contracts.				
6	Adequate knowledge and experience of key procurement managers in light of responsibilities for procurements for Federal awards.				
7	Clear assignment of authority for issuing purchasing orders and contracting for goods and services.				
	Risk Assessment				
8	Procedures to identify risks arising from vendor inadequacy, e.g., quality of goods and services, delivery schedules, warranty assurances, user support.				
9	Procedures established to identify risks arising from conflicts-of-interest, e.g., kickbacks, related party transactions, bribery.				
10	Management understands the requirements for procurement and suspension and debarment, and, given the organization's staff, departments, and processes, has identified where noncompliance could likely occur.				
11	Conflict-of-interest statements are maintained for individuals with responsibility for procurement of goods or services.				

		Yes	No	N/A	Comments
	Control Activities				
12	Job descriptions or other means of defining tasks that comprise particular procurement jobs.				
13	Contractor's performance with the terms, conditions, and specifications of the contract is monitored and documented.				
14	Establish segregation of duties between employees responsible for contracting and accounts payable and cash disbursing.				
15	Procurement actions appropriately documented in the procurement files.				
16	Supervisors review procurement and contracting decisions for compliance with Federal procurement policies.				
17	Procedures established to verify that vendors providing goods and services under the award have not been suspended or debarred by the Federal Government.				
18	Official written policy for procurement and contracts establishing: a. Contract files that document significant procurement history; b. Methods of procurement, authorized including selection of contract type, contractor selection or rejection, and the basis of contract price; c. Verification that procurements provide full and open competition; d. Requirements for cost or price analysis, including for contract modifications; e. Obtaining and reacting to suspension and debarment certifications; and f. Other applicable requirements for procurements under Federal awards are followed.				
19	Official written policy for suspension and debarment that: a. Contains or references the Federal requirements; b. Prohibits the award of a subaward, covered contract, or any other covered agreement for program administration, goods, services, or any other program purpose with any suspended or debarred party; and c. Requires staff to determine that entities receiving subawards of any value and procurement contracts equal to or exceeding $25,000 and their principals are not suspended or debarred, and specifies the means that will be used to make that				

		Yes	No	N/A	Comments
	determination, i.e., checking the *Excluded Parties Listing System* (EPLS), which is maintained by the General Services Administration; obtaining a certification; or inserting a clause in the agreement.				
	Information and Communication				
20	A system in place to assure that procurement documentation is retained for the time period required by the A-102 Common Rule, OMB Circular A-110 (2 CFR part 215), award agreements, contracts, and program regulations. Documentation includes: a. The basis for contractor selection; b. Justification for lack of competition when competitive bids or offers are not obtained; and c. The basis for award cost or price.				
21	Employees' procurement duties and control responsibilities are effectively communicated.				
22	Procurement staffs are provided a current hard-copy *EPLS* or have on-line access.				
23	Channels of communication are provided for people to report suspected procurement and contracting improprieties.				
	Monitoring				
24	Management periodically conducts independent reviews of procurements and contracting activities to determine whether policies and procedures are being followed as intended.				