

## Cornerstone Chartered Public School

### FIN-01 Debarment and Suspension Compliance Policy

**Purpose:** To ensure compliance with 2 CFR Part 180 and 2 CFR § 200.213 regarding debarment and suspension and to protect the integrity of federal grant funds administered by Cornerstone Chartered Public School (Cornerstone).

**Policy Statement:** Cornerstone is prohibited from entering into contracts, subawards, or covered transactions funded by federal grants (including the Charter School Program grant) with parties that are debarred, suspended, or otherwise excluded from participation in federal programs.

Cornerstone shall take proactive steps to ensure that federal funds are only awarded to eligible vendors, contractors, consultants, and service providers.

#### **Procedures:**

1. **Pre-Award Verification:** Prior to executing any contract or purchase order funded in whole or in part by federal funds, Cornerstone will verify the eligibility of each vendor or contractor by checking the federal **SAM.gov Exclusions List** (<https://sam.gov/content/exclusions>).
2. **Certification Requirement:** All contracts funded with federal grants shall include a certification stating that the vendor or contractor is not debarred, suspended, proposed for debarment, or declared ineligible.
3. **Documentation:** Cornerstone will maintain documentation of the SAM.gov search and vendor certification for each covered transaction. Records shall be retained for a minimum of five (5) years from the completion of the grant.
4. **Responsibility:** The Executive Director or designee is responsible for ensuring compliance with this policy, conducting verifications, and maintaining proper documentation.
5. **Noncompliance:** If a vendor or contractor is discovered to be debarred or suspended after award, Cornerstone will cease using federal funds for the contract and report the matter to the New Hampshire Department of Education or other designated grant authority.

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#### **Legal References:**

- 2 CFR Part 180 (OMB Guidelines on Debarment and Suspension)
- 2 CFR Part 200.213 (Suspension and Debarment under Uniform Guidance)

Adopted by the Board of Trustees on May 20, 2025.