

Information

Sanction Check Screening

Effective

December 18 2007

Number

ICO 1 02

Applicability

This policy applies to University of Louisville employees administrators faculty staff and student employees vendors and affiliated individuals

Administrative Authority

Vice President for Risk Audit and Compliance

Responsible Unit

University Integrity and Compliance Office
215 Central Avenue, Suite 205, Louisville, KY 40208
Phone: 502.852.5709
Email: compliance@louisville.edu

History

Revision Date(s): January 23, 2009; December 20, 2017; January 25, 2019 (minor revisions); March 10, 2021 (minor revisions, combined policy and procedure documents); September 6, 2022 (minor revision); May 10, 2023; August 19, 2024; November 13, 2024

Reviewed Date(s): October 23, 2014; December 20, 2017; March 10, 2021; May 10, 2023; November 13, 2024

Categories

Statement:

The University of Louisville (University) exercises due diligence in hiring and screening employees, vendors, and affiliates. University employees, vendors, and appropriate affiliated individuals must be checked against appropriate governmental exclusion, debarment, and suspension lists to ensure eligibility for hire and/or to participate in University programs.

Related Information:

[ecoCheck Support and Training Videos](#) (requires ecocheck.ethico.com user log-in)

Definitions:

Affiliated Research Personnel - any non-University employed individuals involved in University research.

Vendor - any organization or individual providing goods or services to the University, excluding refunds and reimbursements.

Contractor - any individual or other legal entity that enters into a contract/agreement for goods and services made through Contract Administration and Procurement Services equal to or exceeding \$25,000.

Responsibilities:

The following administrative offices and departments are responsible for sanction check screening procedures as follows:

University Integrity and Compliance Office (UICO) is responsible for administering and overseeing the University's sanction check policy and procedures, including the following:

- Review and renewal of the University's contract/agreement with the third-party Vendor, ComplianceLine, LLC (d/b/a Ethico), for sanction check services provided, including the online searchable database system (ecocheck.ethico.com).
- Serve as the System Administrator for the sanction check online searchable database system (ecocheck.ethico.com) and train new users how to use the system.
- Maintain the University's Sanction Check policy and procedures, and serve as the subject matter expert, in conjunction with the Office of General Counsel and VP for Legal Affairs and other University compliance officials, on federal and state agency exclusion and debarment requirements.

- Complete annual sanction check screening of all active University employees and maintain supporting documentation. The UICO obtains a list of all active University employees as of September 1st from Workday.
- Complete monthly sanction check screening of all active University Health Sciences Center (HSC) employees and maintain supporting documentation. The UICO obtains a list of active HSC employees from Workday.
- Complete annual sanction check screening of University Procurement Card merchants with annual expenditures of \$500 or greater and maintain supporting documentation. The UICO obtains a list of all merchants with annual expenditures of \$500 or greater from the Card Services Department.

Human Resources Department (HR) - Responsible for ensuring sanction check screening is completed of all new University employees for verification of employment eligibility prior to hire date. The sanction check screening is included as part of the applicant's criminal background check. HR is responsible for maintaining supporting documentation of sanction check screenings and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action.

Business Operations Department - Responsible for sanction check screening of new University employees who are exempt from University's criminal background check screening process conducted through the HR department. Business Operations is responsible for maintaining supporting documentation of sanction check screenings and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action.

Controller's Office - Accounts Payable Department - Responsible for sanction check screening via ecocheck.ethico.com of all new University Vendors and recurring monthly screening of active Vendors with transactions. The sanction check screening procedures of Vendors is part of the University's Vendor eligibility and approval process. Accounts Payable is responsible for maintaining supporting documentation of sanction check screenings and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action.

Contract Administration and Procurement Services - Responsible for sanction check screening of new University Contractors and Contractor renewals via ecocheck.ethico.com. The sanction check screening is done prior to contract award and is part of the contract eligibility process. Contract Administration and Procurement Services is responsible for maintaining supporting documentation of

sanction check screenings and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action. See [Purchasing Policy #13.00 - Eligibility to Participate in Governmental Programs](#).

Office of Research Integrity (ORI) - Responsible for sanction check screening of Affiliated Research Personnel via ecocheck.ethico.com to help ensure the individual's eligibility to participate in University research programs. ORI is responsible for maintaining supporting documentation and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action. Contact ORI at ori@louisville.edu for Standard Operating Procedures Manual #RI-050.

Office of Sponsored Programs Administration (OSPA) - Responsible for sanction check screening of subcontractors/subrecipients prior to execution of subcontract/subaward for federal contracts or federal flow-through contracts via ecocheck.ethico.com. OSPA is responsible for maintaining supporting documentation and reporting confirmed positive matches to the UICO for joint determination and implementation of appropriate action.