

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.

Procedures:

University employees, vendors, and appropriate affiliated individuals are checked against, but not limited to, the following federal and state exclusion, debarment, and suspension lists:

- U.S. Department of Health and Human Services, Office of Inspector General's (OIG) List of Excluded Individuals/Entities (LEIE).
- General Services Administration's (GSA) System for Award Management (SAM) Excluded Parties List System (EPLS).
- U.S. Food and Drug Administration's (FDA) Debarment List and Disqualified/Totally Restricted List for Clinical Investigators.
- U.S. Government International Trade Administration's Export.gov Consolidated Screening List.
- U.S. Department of the Treasury, Office of Foreign Asset Control's (OFAC) **Specially** Designated Nationals (SDN) and Blocked Persons List, and Consolidated Sanctions List (Non-SDN sanctions, including Foreign Sanctions Evaders).
- U.S. Department of Commerce (DOC), Bureau of Industry and Security's (BIS) Denied Persons List, Entity List, Unverified List, and Military End User List.
- U.S. Department of State's (DOS), Directorate of Defense Trade Control's List of Statutorily Debarred Parties, and List of Administratively Debarred Parties.
- Kentucky Cabinet for Health and Family Services, Department for Medicaid Services (DMS) List of Excluded Providers.
- Indiana Family and Social Services Administration, Indiana Terminated Providers List.

The sanction check screening process includes identification and verification of an individual/entity name of a prospective employee, employee, prospective vendor, vendor, or affiliated individual that potentially matches to a sanctioned individual/entity name identified on an applicable governmental exclusion, debarment, or suspension list and determining if the identified name is a positive match and if the individual/entity is eligible for hire and/or participation in University programs. The verification procedures, system user instructions, and associated certification forms are provided below:

- [Employee and Affiliated Individual Verification Procedures](#)
- [Employee and Affiliated Individual Certification Form](#)
- [Vendor Verification Procedures](#)
- [Vendor Certification Form](#)

- [ecoCheck.com System User Instructions](https://ecocheck.com)

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.