



Understanding SAM.gov Requirements

Tool 5-12

CDBG funded projects are subject to HUD general requirements found at 24CFR Part 5, including the requirement to verify that entities procured with federal funds are not excluded from participation in Federally-assisted projects. Under 2 CFR Part 200: *Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Funds*, the methods of complying an excluded party review has been established by the Office of Management and Budget (OMB) through 2 CFR Part 180, which details the process for using the Governmentwide System for Award Management Exclusions (SAM) to determine if entities have been either suspended or debarred.

The chart below is designed to assist anyone working with CDBG funds to determine if an entity will be required to fully register in SAM.gov, use SAM.gov to secure a Unique Entity Identifier (UEI), and be subject to an excluded party review, commonly termed a “debarment check” which is required prior to entering into a written contract or agreement.

Entity	SAM.gov Requirement			Notes/Best Practice
	Registered	UEI	Debarment Check	
HCD	Yes	Yes	Yes	In order for HCD to receive a Grant Agreement from HUD, the State must be registered in Sam.gov, have a UEI and not be suspended or debarred.
Grantees (Units of Local Government executing Standard Agreement with HCD)	Yes	Yes	Yes	In order for HCD to issue a Standard Agreement, the applicant must be registered in Sam.gov, have a UEI and not be suspended or debarred.
HCD Subrecipient (Tribe or non-profit executing Standard Agreement with HCD)	Yes	Yes	Yes	In order for HCD to issue a Standard Agreement, the applicant must be registered in Sam.gov,



Entity	SAM.gov Requirement			Notes/Best Practice
	Registered	UEI	Debarment Check	
				have a UEI and not be suspended or debarred.
Grantee selected Subrecipients (entities operating a program on behalf of the Grantee)	Yes	Yes	Yes	In order for a grantee to issue a contract for carrying out an eligible activity, the subrecipient must be registered in Sam.gov, have a UEI and not be suspended or debarred.
Contractor (who has been <u>procured</u> by HCD, a Grantee, or a Subrecipient)	Yes	Yes	Yes	Prior to executing any contract for services, the contracting entity must verify registration, UEI, and conduct a "debarment check".
Businesses eligible under 105(a)(17)	Yes	Yes	Yes	Prior to executing any contract for services, the contracting entity must verify registration, UEI, and conduct a "debarment check".
Subcontractor – used by a procured Contractor	No	Yes	Yes	While these entities are not required to "register" in SAM.gov, a UEI must be obtained, and a "debarment check" performed.
Beneficiary (including microenterprises, homebuyers and homeowners)	No	No	No	Some programs may recommend running a "debarment check" on businesses or



Entity	SAM.gov Requirement			Notes/Best Practice
	Registered	UEI	Debarment Check	
				microenterprises prior to issuing awards, but this is not required by OMB.
Contractor or Subcontractor selected/hired by a beneficiary	No	No	Yes	While these entities are not required to "register" in SAM.gov, a "debarment check" should be performed using a UEI or another identifiable searchable field.

BASIC INSTRUCTIONS FOR DEBARMENT CHECKS

Users are not required to be logged into SAM.gov to conduct an excluded party review (search for "exclusions" – also known as suspension or debarment). Below are the steps to conduct a "debarment check" without logging into the SAM.gov system.

- 1) Access the SAM.gov exclusion webpage: <https://sam.gov/content/exclusions>
- 2) If you have the Unique Entity ID for the entity, type the UEI in the search box.

The screenshot shows the SAM.gov homepage with the "Exclusions" section highlighted. In the "Search Exclusions" input field, the UEI "MMWUN21FMPC2" is entered. A red arrow points to this input field. Below the input field are two buttons: "Get started searching exclusions" and "Use exclusions advanced search". To the right of the search bar, there is a "Federal Users" sidebar with links to "Go to workspace" and "Go to Exclusions Federal home". At the bottom of the page, there are four boxes: "Exclusions Resources" (with links to Types of exclusions, Legacy CT Codes, Agency exclusions points of contact), "Download Data Files" (with links to Downloading exclusions files, Understanding the exclusions, Go to exclusions downloads), "Connect to Data Services" (with links to How to use data services, Data services quick start guide, Video: Using data services, Go to public exclusions API), and "Help" (with links to Frequently Asked Questions, Glossary Terms, Videos).



SAM.GOV

Home Search Data Bank Data Services Help

Search All Words e.g. 1606N020Q02

Select Domain Entity Information
All Entity Information
Entities
Disaster Response Registry
Exclusions

Filter By
Keyword Search
For more information on how to use our keyword search, visit our help guide [\[link\]](#)
Any Words All Words Exact Phrase
e.g. 123456789, Smith Corp
MMWUN21FMPC2
Classification

No matches found
We couldn't find a match for your search criteria.
Please try another search or go back to previous results.



“No matches found” indicates that the entity is not excluded from participation.\

3) If you do not have the UEI, click on Advanced Search

https://sam.gov/content/exclusions

An official website of the United States government [Here's how you know](#)

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Home Search Data Bank Data Services Help

Exclusions
An exclusion record identifies parties excluded from receiving Federal contracts, certain subcontracts, and certain types of Federal financial and non financial assistance and benefits. Exclusions are also referred to as suspensions and debarments.

Search Exclusions

e.g. Smith, 123456789

Show active only

Federal Users
Getting started for federal exclusions managers.

ato...pdf ^

Red arrow pointing to the "Advanced Search" button.





- 4) Choose All Words. Enter the entity name in the search box. For best results, do not type the entire entity name including commas, etc. (Example: “ABC Time Corporation” would be entered as “ABC”)

An official website of the United States government [Here's how you know](#)

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Home Search Data Bank Data Services Help

Search All Words e.g. 1606N020Q02

Select Domain Entity Information

All Entity Information
Entities
Disaster Response Registry
Exclusions

Filter By

Keyword Search
For more information on how to use our keyword search, visit our [help guide](#)

Any Words
 All Words
 Exact Phrase

e.g. 123456789, Smith Corp

Classification
Excluded Individual
Excluded Entity
Federal Organizations
Exclusion Type
Exclusion Program
Location
Dates

Select Criteria
Choose your filters and run your report to begin.



Select Domain Entity Information

All Entity Information

Entities

Disaster Response Registry

Exclusions

Filter By

Keyword Search

For more information on how to use our keyword search, visit our help guide [\[link\]](#)

Any Words ⓘ

All Words ⓘ

Exact Phrase ⓘ

Classification

Excluded Individual

Excluded Entity

Federal Organizations

Exclusion Type

Exclusion Program

Location

Dates

Reset

No matches found

We couldn't find a match for your search criteria.

Please try another search or go back to previous results.

[Go Back](#)

“No Matches Found” indicates there is no current exclusion for that entity. By typing in the full name as provided, the search appears to have yielded no exclusions for ABC Time Corporation.



Search All Words e.g. 1606N020Q02

Select Domain Entity Information

All Entity Information Entities Disaster Response Registry Exclusions Filter By Keyword Search For more information on how to use our keyword search, visit our help guide ⓘ Any Words (radio button) All Words (radio button) Exact Phrase (radio button) abc

ABC Time Corp. Active Unique Entity ID Q4EV9PMNZK88 CAGE Code (blank) Physical Address 262 West 25th St., 2nd Floor, New York, NY 10001 USA Classification Firm Activation Date Apr 26, 1996 Termination Date Indefinite

ABC Diagnostic Active Unique Entity ID Q8CDL16J6W51 CAGE Code (blank) Physical Address 20284 Old Cutler Rd., Miami, FL 33257 USA Classification Firm Activation Date Apr 30, 1998 Termination Date Indefinite

ABC Eureka Medical Rentals Active Unique Entity ID R4EV9PMNZK88 CAGE Code (blank) Physical Address 1800 West 49th St., No. 115, Hialeah, FL 33016 USA Classification Firm Activation Date Sep 21, 2000 Termination Date Indefinite

ABC Active Unique Entity ID Q298PQJ9CUF1 CAGE Code (blank) Physical Address 110 Darien Hwy., Brunswick, GA 31520 USA Classification Firm Activation Date Nov 1, 1996 Termination Date Indefinite

ABC Diagnostic Active Unique Entity ID Q8CDL16J6W51 CAGE Code (blank) Physical Address 20284 Old Cutler Rd., Miami, FL 33257 USA Classification Firm Activation Date Jan 20, 1998 Termination Date Indefinite

ABC Eureka Medical Rentals Active Unique Entity ID R4EV9PMNZK88 CAGE Code (blank) Physical Address 1800 West 49th St., No. 115, Hialeah, FL 33016 USA Classification Firm Activation Date May 18, 2000 Termination Date

Sort by Relevance

By typing in only a portion of the name and reviewing all results, it is evident that the company IS excluded from participation in a Federally-assisted project. NOTE: Comparison of company details such as address should be verified to ensure they are the same entity.

- 5) When a search yields an Exclusion for an entity, the Grantee may not enter a contract or written agreement with that entity.
- 6) When a search yields the “No matching records”, Grantees should print a hard copy or an electronic screenshot that clearly shows the search parameters used and “No matching records” to be maintained for HCD monitoring.
- 7) Grantees must ensure that **a clause is included in ALL CDBG contracts and written agreements that an excluded party review will be conducted, and the contractor is not knowingly excluded.** This is particularly important with “no matches found” results, but also applies to all contracts and written agreements.
- 8) Grantees must do “debarment check” prior to contract execution - even if the entity has not received a UEI yet.
- 9) Grantees may not disburse funds to an entity until the UEI is obtained, when applicable. See above chart.