



Addendum to Procurement Policy

Debarment Documentation Requirements for Schools Using Buy-to-Pay (B2P) or HCOM

Purchases of any amount from debarred suppliers/vendors cannot be charged to federal funds, cost-share funds, or expenses to be journaled onto federal or cost-share funds.

Federal Awards that have been classified as a grant, cooperative agreement or other transaction award do not require additional debarment documentation due to daily, automatic reviews completed by Visual Compliance in Harvard's Supplier Portal.

Federal awards that have been classified as a contract, whether cost reimbursable or fixed price, under Federal Acquisition Regulations (FAR) require additional debarment attestation by the supplier for purchases of \$35,000 or more. However, per Harvard Policy, the debarment requirement threshold will remain at \$25,000 until all users have transitioned from HCOM to B2P. This also applies to cost-share funds linked to federal contracts. The additional documentation can be in the form of a signed [Debarment Form](#) or be included as language in the signed contract.

Federal funding classifications can be found under the "funding instrument" column in the HART Grants Management Segments Report, the first page of an action memo, and the top of a segment homepage in GMAS. See [Finding the Funding Instrument for Sponsored Awards](#).

Schools and units must review their payments and journals to confirm any debarment language or attestations are included as needed. The Office for Sponsored Programs will also monitor purchase orders and journals on federal contracts on a monthly basis. Any awards or cost-share funds that require but do not have debarment information on file, cannot be charged to a federal award or cost-share funds.

Debarment Documentation Requirements

- **For Grants, Cooperative Agreements, or Other Transaction Awards (OTA):** No additional debarment requirements. Supplier is automatically reviewed daily by Visual Compliance for debarments as well as other federal watch lists. (See Note 1)
- **For Contracts or Fixed Price Contracts with a purchase or funding commitment under \$25,000:** No additional debarment requirements. Supplier is automatically reviewed daily by Visual Compliance for debarments as well as other federal watch lists. (See Note 1)
- **For Contracts or Fixed Price Contracts with a purchase or funding commitment of \$25,000 or more:** Debarment language is required either through: 1) Signed debarment form uploaded into B2P or HCOM, or 2) Debarment language included in signed contract

Note 1: HCOM users, please complete the HCOM electronic VJF and Debarment form as needed. If the award is a grant, cooperative agreement, or OTA, select "DC not required, appears in contract language" since a debarment form is not required for those award types. Schools and units in HCOM may continue to choose to follow the more restrictive policy of requiring debarment forms for all federal funds equal to or greater than \$25,000 during the HCOM B2P transition.