

Public Guide to U.S. Department of the Interior
Suspension and Debarment Program

U.S. DEPARTMENT OF THE INTERIOR

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I. Introduction

This information is provided to inform the public about the U.S. Department of the Interior (DOI) Suspension and Debarment Program. This Guide contains information about the Program's structure, organizational participants, the participants' roles, and the general suspension and debarment process from case initiation to completion. It is provided for general informational and transparency purposes only. It does not create any rights, substantive or procedural, enforceable at law by any party, and it may not be relied upon to create these rights.

II. Authorities

DOI takes action under two separate, reciprocal, and largely identical debarment regulations. One regulation covers procurement programs; the other regulation covers nonprocurement programs, such as discretionary assistance, loan, lease, concession, and benefit programs. The Governmentwide suspension and debarment procurement rule, located in the Federal Acquisition Regulation (FAR) at 48 C.F.R. Subpart 9.4, is supplemented by the Department of the Interior Acquisition Regulation (DIAR) at Part 1409. The Office of Management and Budget (OMB) promulgated Guidelines to agencies on Governmentwide suspension and debarment for nonprocurement transactions. These guidelines are located at 2 C.F.R. Part 180 and were adopted and supplemented by the DOI implementing regulation at 2 C.F.R. Part 1400. Additional relevant authorities include: The Federal Acquisition Streamlining Act of 1994, Public Law 103-355, § 2455 (31 U.S.C. § 6101, note); and Executive Orders 11738, 12549, and 12689.

III. Definitions

- A. **Action Referral Memorandum (ARM):** is a memorandum from the Office of Inspector General (OIG) to the Department's Suspending and Debarring Official (SDO) that recommends suspension, debarment, or other administrative action to protect the business interests of the Federal Government. The ARM articulates the factual and regulatory basis for the recommendation and provides any supporting documentation.
- B. **Adequate Evidence:** is information sufficient to support the reasonable belief that a particular act or omission has occurred.
- C. **Compliance and Ethics Agreement:** is a negotiated administrative agreement entered between a respondent and an agency to resolve suspension or debarment matters in lieu of award ineligibility.
- D. **Contractor:** is any individual or other legal entity that (a) submits offers for, is awarded, or reasonably may be expected to submit offers for or be awarded, a Government contract or subcontract; or (b) conducts business with the Government as an agent or representative of another contractor.

- E. **Covered Transaction:** is a nonprocurement or procurement transaction. A covered transaction may be at the primary tier, which is between a Federal agency and a person, or at a lower tier, which is between a participant in a covered transaction and another person. The term “person” applies to individuals, corporations, partnerships and other legal entities.
- F. **Debarment:** is an action by an SDO to exclude a contractor or participant from being awarded Federal Government contracts, Government-approved subcontracts, or nonprocurement awards for a specific period of time. Debarment also excludes a person from participating in covered transactions for a specific period of time.
- G. **Lack of Present Responsibility:** is evidence that a contractor or participant has engaged in criminal conduct, poor performance, or other improper conduct of such a compelling and serious nature that it would lead one to question the honesty, ethics, or competence of a contractor or participant.
- H. **Matters in Opposition:** is the response provided by the respondent contesting the notice of administrative action. In accordance with FAR §§9.406-3(c)(4) and 9.407-3(c)(5) for procurements actions, or 2 C.F.R. §§ 180.720, 180.730, 180.815, and 180.825 for nonprocurement transactions, the party may present information regarding the appropriateness of the administrative action or the duration of the debarment in person, in writing, or through a representative. When the party presents matters in person or by telephone, the proceeding is referred to as a Presentation of Matters in Opposition (PMIO).
- I. **Nonprocurement Rule (NPR):** provides for a Governmentwide system of nonprocurement suspension and debarment. A person who is suspended or debarred is excluded from Federal financial and nonfinancial assistance and benefits under Federal programs and activities. Suspension and debarment of a participant in a program by one agency has Governmentwide, reciprocal effect. The regulation appears in the OMB Guidelines at 2 C.F.R. Part 180, which DOI subsequently adopted at 2 C.F.R. Part 1400.
- J. **Nonprocurement transaction:** is any transaction, regardless of type (except procurement contracts), including, but not limited to the following: (1) grants; (2) cooperative agreements; (3) scholarships; (4) fellowships; (5) contracts of assistance; (6) loans; (7) loan guarantees; (8) subsidies; (9) insurances; (10) payments for specified uses; (11) donation agreements; (12) leases, including mineral leases; and (13) concession agreements. A nonprocurement transaction at any tier does not require the transfer of Federal funds. For example, the transaction may be a lease of real property or a loan guarantee.
- K. **Participant:** is any person who submits a proposal for or who enters into a covered transaction, including an agent or representative of a participant. Participants for nonprocurement transactions may also be referred to as recipients.

- L. **Preponderance of the Evidence:** is proof by information that when compared with information opposing it, leads to the conclusion that the fact at issue is more probably true than not.
- M. **Letter of Inquiry:** is a letter sent by the OIG informing a party that they are being reviewed for a potential suspension or debarment referral and requesting that the party tell the OIG why they believe that the agency should not take administrative action. For example, the OIG may send a letter of inquiry to a company to determine whether the company participated in an employee's misconduct or whether its compliance program had weaknesses that led to the failure to detect or prevent the misconduct.
- N. **Procurement transaction:** is a transaction to acquire supplies or services (including construction) for the use of the Federal Government. The transaction is done by contract with appropriated funds by and through purchase or lease, whether the supplies or services are already in existence or must be created, developed, demonstrated, and evaluated.
- O. **Respondent:** is a person against whom a suspension or debarment action has been initiated.
- P. **Suspending and Debarring Official (SDO):** is an agency head or a designee authorized by the agency head to impose suspension or debarment. The DOI SDO is the Director of the Office of Acquisition and Property Management (PAM). The director is also the DOI Senior Procurement Executive.
- Q. **Suspension:** is an action taken by an SDO to exclude a contractor temporarily from Federal Government contracting and Government-approved subcontracting. Suspension is also an action to exclude a person from participating in covered transactions for a temporary period.
- R. **System for Award Management (SAM),** located at www.sam.gov, is a system maintained by the General Services Administration (GSA). SAM contains the names, addresses, and identities of persons suspended, debarred, or voluntarily excluded from Federal procurement and nonprocurement programs. SAM also includes the names, addresses, and identities of persons proposed for debarment from Federal procurement or nonprocurement awards pursuant to the FAR. The SAM exclusions section replaced the GSA Excluded Parties List System (EPLS). Suspensions, proposed debarments, debarments pursuant to the FAR, and suspensions and debarments pursuant to 2 C.F.R. Part 180 are entered into the exclusions section of the SAM ordinarily within three (3) working days of the date of the action.

IV. Program Roles and Responsibilities

The DOI Suspension and Debarment Program is designed to ensure a proactive means to assess whether a person poses a potential business risk as a Federal contactor or participant and to manage high risk over the long term.

A. Suspending and Debarring Official

The DOI SDO reviews action referral memoranda and supporting information and decides whether suspension or debarment action is warranted. The SDO also issues notices of action to respondents and decides the final outcome of all cases, including the period of any exclusion to be imposed in accordance with applicable laws and regulations. The SDO, or designee, enters the names of suspended or debarred respondents into the SAM. The SDO also approves, on behalf of DOI, any negotiated resolution of suspension and debarment matters by compliance and ethics agreements.

B. DOI Debarment Program Director

The Debarment Program Director (DPD) is the national program manager of the DOI suspension and debarment program. The DPD reports to and advises the SDO. The DPD is responsible for the overall management of DOI's debarment program and the processing of suspension and debarment actions. The DPD, in consultation with the SDO and the DOI OIG, establishes DOI Debarment Program policies and resolves procedural questions related to matters before the SDO.

C. Office of Inspector General

1. Assistant Inspector General for Investigations

The Assistant Inspector General for Investigations (AIGI) is responsible for overseeing the OIG Administrative Remedies Division (ARD).

2. Director, Administrative Remedies Division

The OIG Director of the Administrative Remedies Division (DARD) administers and coordinates the OIG's efforts relating to administrative remedies, including the suspension and debarment recommendation process. The DARD recommends actions to the SDO. In addition, in consultation with the OIG Debarment Program Manager (OIG DPM), the DARD establishes and maintains the OIG suspension and debarment recommendation process policy. The DARD routinely reviews OIG investigative actions and coordinates with the relevant OIG investigative field offices and other DOI bureau law enforcement offices regarding potential administrative actions. The DARD is also responsible for coordinating with the leadership of the Office of Audits, Inspections and Evaluations for the potential referral of audits as the basis for suspension

and debarment actions. The DARD will coordinate with the SDO and DOI's DPD to ensure that the SDO has the information necessary to take suspension or debarment action.

3. OIG Debarment Program Manager

The OIG DPM is located in the OIG ARD. The OIG DPM manages OIG's suspension and debarment recommendation process. The OIG DPM collects and presents information to the DARD relating to potential suspension and debarment matters. The OIG DPM also negotiates and monitors compliance and ethics agreements, including reviewing alleged breaches of such agreements. The OIG DPM interfaces with various Federal and state investigative, program, prosecutorial, and other officials. The OIG DPM generally coordinates the development of matters for review by the DARD and for consideration by the SDO. The OIG DPM will coordinate with the SDO and the DOI DPD to ensure that the SDO has the information necessary to take the recommended suspension or debarment action.

4. OIG Counsel

The OIG General Counsel is the attorney for the OIG. ARD consults with the OIG General Counsel regarding disclosures of records involving privacy issues, and ARD will request a legal opinion when appropriate.

D. Bureaus

When DOI bureau procurement officials and nonprocurement award officials become aware of information that indicates a lack of business honesty, integrity, or serious poor performance by a contractor or participant, the officials are required to forward this information to the SDO. Under the DOI debarment rules, a bureau may, if it desires, prepare and forward a referral directly to the SDO. However, bureaus are instructed to refer matters to the DOI OIG for evaluation and preparation of an action referral memorandum to the SDO.

E. Office of the Solicitor

The Office of the Solicitor (SOL) is the DOI legal counsel and, as such, provides legal advice to the SDO. The SOL requests U.S. Department of Justice (DOJ) representation for the DOI in the event that a decision of the SDO is challenged in Federal court. The SOL General Law Division is designated to advise PAM.

V. Suspension and Debarment Process

A. Case Referral Development Process

Ordinarily, potential suspension and debarment actions originate with the OIG ARD. Information indicating that a suspension or debarment action may be warranted can come from a wide range of sources. Potential sources include agency award personnel, Department or bureau law enforcement personnel, other agencies, and members of the public. The OIG DPM coordinates the collection and assembly of relevant information about a contractor/participant and then analyzes the information in accordance with applicable Federal regulations. The OIG DPM consults with other Federal agencies with a known or suspected interest in the matter in order to decide which Federal agency should act as lead agency.

The OIG DPM follows the Interagency Suspension and Debarment Committee (ISDC) lead agency coordination process to consult with other Federal agencies to decide the lead agency. Where DOI is the lead agency for a suspension or debarment action, the OIG DPM coordinates with appropriate officials. If lead is assigned to DOI, the OIG DPM develops a plan for sharing important information and developments in the case with internal and external interested offices. The DOI DPM will also obtain from the offices any important information that may bear on the matter.

At any time during the initial case review, the OIG DPM may consult with the DOI DPD regarding interpretations of applicable regulations or policies or to advise the SDO of important events or interests that may be impacted by a suspension or debarment action. The OIG DPM, through the DOI DPD, will also keep the SDO informed of the progress of any ongoing settlement discussions or negotiations with a contractor/participant prior to or after the SDO's issuance of a notice of action.

If the OIG DARD, in consultation with the OIG DPM, determines that additional information is needed during the referral development process, the OIG DARD may use OIG investigative resources to obtain additional information. The OIG DARD may also issue a letter of inquiry to the respondent to obtain the necessary additional information. Where a respondent does not respond to the letter of inquiry, and an ARM is subsequently prepared and referred to the SDO, the ARM will note the fact that the respondent did not reply. The SDO may draw any reasonable inferences appropriate under the circumstances.

The ARM, which functions akin to an administrative complaint, reports information and activities about a party that raises serious questions about that person's suitability to serve as a potential contractor, subcontractor, recipient, participant, agent, representative, or principal in federally-financed transactions. The ARM and its attachments usually constitute the primary source of information for the SDO to take action to protect Government procurement and

nonprocurement transactions from fraud, waste, abuse, poor performance, noncompliance, and unsatisfied debts.

B. SDO Review and Proceedings

The DPD reviews the ARM in accordance with applicable regulations. When the DPD has reviewed the ARM and decided that action is appropriate, the DPD prepares and forwards an action notice to the SDO. If the SDO determines that administrative action is appropriate, the SDO will issue a Notice of Suspension, a Notice of Proposed Debarment, or Notice of Suspension and Proposed Debarment to the respondent, pursuant to applicable provisions under FAR Subpart 9.4 or 2 C.F.R. Part 180. Consistent with the rule under which the action is initiated and the type of action, PAM ordinarily makes the exclusion entry in SAM within three (3) working days of the notice issuance date.

The DOI notice will ordinarily transmit a copy of the ARM and its attachments. However, where the notice initiates a fact-based action and the attachments are voluminous, the SDO may choose to send out the ARM without the attachments. The SDO will also notify the respondent in the notice that a copy of the ARM attachments will be provided upon request. In some limited instances, such as in the case of pre-indictment suspensions, where there is a request by a prosecutor to deny fact finding, the suspension notice will contain a statement advising the respondent of the prosecutor's request, and the SDO will issue the notice without the ARM or attachments.

If the DPD has reviewed the ARM and decided that action is not appropriate at this time, the SDO, in consultation with the DPD, will notify the OIG DARD and/or the OIG DPM of why an action is not appropriate and request further information or documentation.

VI. Notice Reply Period

To contest an action, a respondent must submit a written response within the 30-day reply period. Communication by telephone does not satisfy the 30-day reply requirement. The SDO, exercising sole discretion, may consider an untimely contest letter. If a respondent submits a written response long after the reply period has expired, the SDO will treat the written response as a petition for reinstatement rather than as a contest of the initial notice in those cases where the administrative action has rendered a respondent ineligible.

A. Uncontested Notices

In the event a respondent fails to reply to the notice within the 30-day period, the SDO will issue a default determination to promptly protect the Government program award interests. The SDO will issue default determinations for both uncontested suspensions and uncontested debarment notices.

B. Contesting Administrative Actions

1. Written Submission in Opposition

In order to contest an action taken or proposed by the SDO, the respondent or its representative must make a written submission within 30 days of the respondent's receipt of the notice. (The SDO will consider the notice to be received when delivered, if the agency mails the notice to the last known street address, or five days after the agency sends it, if the letter is undeliverable.) Failure to do so will result in the SDO issuing a default decision. The submission in opposition must set forth the information the respondent wishes the SDO to consider. The DPD, on behalf of the SDO, may authorize an extension of the respondent's 30-day response period. The DPD will grant an extension only for good cause. Any information provided verbally by the respondent or its representative should also be made in writing, unless clearly recorded by the SDO, so that all important information can be preserved for the record and be considered by the SDO when making a decision. If the respondent desires to approach the OIG DARD or DPM during the 30-day period to attempt to resolve the matter under mutually acceptable terms, the respondent may do so. However, discussions between the OIG DARD or DPM and the respondent cannot be the sole basis for extending the 30-day reply period. Any request for a time extension must be made in writing to the DOI DPD. The respondent should send a copy of its submission in opposition to the OIG ARD at the same time the respondent sends it to the SDO. The notice will contain a statement to that effect.

Upon receipt of a submission in opposition, the DPD will issue a letter acknowledging receipt to begin the process. The acknowledgement letter will be sent by email whenever feasible to expedite communication. The letter will be copied to the OIG ARD. The letter will advise the respondent of the case schedule, including the dates by which written submissions are to be made and the date of a PMIO, if one was requested.

2. Oral Presentation of Matters in Opposition

There are two types of oral suspension and debarment proceedings: the PMIO and the more formal fact-finding hearing.

a. PMIO

If the respondent wants to meet with the SDO to present matters in opposition, a meeting with the SDO or designee will be arranged. The respondent may appear in person, or by or with a representative. The SDO may permit agency representatives who have information or an interest in the matter to attend the PMIO. The SDO will allow the respondent to present any information at the meeting that the respondent believes is important for the record that may form the basis of a final decision.

PMIOs ordinarily take place in actions where an indictment or conviction serves as the basis for the action. They can also take place in actions where no indictment or conviction exists, but where facts are not in dispute. Accordingly, the information presented at the PMIO usually comes principally from the respondent, and the information focuses on mitigating factors and/or remedial measures that the respondent believes make suspension and/or debarment unnecessary. Once the Government has established that cause for suspension or debarment exists, the respondent bears the burden of demonstrating to the SDO that suspension and/or debarment are not necessary.

The PMIO is conducted in the manner of an informal business meeting at a conference table. The PMIO is, however, recorded for inclusion in the administrative record. A copy of the PMIO recording is provided at cost to the respondent where requested. The recording is routinely reviewed as a part of the administrative record in the course of preparation of contested case determinations.

b. Fact-Finding Hearing

In fact-based actions, *i.e.*, where there is no indictment or conviction, a PMIO can occur as a preliminary step to determine whether fact-finding is necessary. In fact-based actions, the Government has the burden to establish the existence of cause based on certain evidentiary standards. For suspensions, the Government must meet the adequate evidence standard. For debarments, the Government must meet the preponderance of the evidence standard. A fact-finding hearing may occur before or after a PMIO, depending upon circumstances of the action.

Based upon preliminary written submissions and information presented, the SDO will consider whether all pending factual issues related to cause have been adequately addressed. The SDO must be satisfied that the issues, allegations, and responses made to them are clear and that the parties have had an opportunity to present information for the record. The SDO will then determine whether there are facts material to cause that are genuinely in dispute and whether resolution of the particular disputed facts is necessary to render a decision. If so, the SDO will submit those disputed facts to a designated official who shall conduct additional proceedings (*i.e.*, a fact-finding hearing) to determine the disputed facts before the SDO will decide the matter. The SDO may decide to submit disputed material facts for a hearing before meeting with a respondent.

However, where it is apparent that facts material to the cause stated in the notice are genuinely in dispute, fact finding will be undertaken.

If the SDO submits material facts that are genuinely in dispute for a hearing, a proceeding will be conducted to receive information and evidence that bears on the disputed facts from both the respondent and the OIG ARD. The proceeding is an evidentiary hearing. However, because suspension and debarment actions are not subject to the Administrative Procedures Act, the Federal Rules of Evidence and Civil Procedure do not apply. The objective of the hearing is to elicit reliable, probative evidence to establish the existence of facts to support the presence of cause(s) for debarment (or suspension where fact finding is authorized). To that end, documentary evidence is taken into the record. Direct witness testimony and cross examination of witnesses presented by both the Government and the respondent occurs. Unlike the PMIO, fact-finding proceedings are transcribed. This is routinely done through the use of a court reporter. The Government bears the burden of proof to establish cause for suspension or debarment. It should be noted that under the suspension and debarment rules, the SDO does not have the authority to compel the appearance of witnesses or the production of documents.

The hearing official, ordinarily the DPD, will notify the participants of the time, place, procedures, and other logistics necessary to conduct the hearing. The official will also determine the appropriate manner to receive and weigh the information in finding facts. The proceedings will be conducted in accordance with the DOI procedures for fact finding, which will be provided to the respondent. The procedures are also posted on the Debarment page of the PAM website. Fact-finding determinations are in writing, and they document the basis for the facts found. The hearing's determinations are then used by the SDO in reaching a final decision.

C. Contested Case Determination

When the SDO is satisfied that the administrative record is complete, including any findings with respect to material facts in genuine dispute, the SDO issues a written decision letter to the respondent. The SAM will be promptly updated to add, modify, or remove an exclusion entry, as appropriate. DOI posts its contested case determinations on the debarment program page of the PAM website for transparency purposes.

VII. Petition for Reconsideration or Reinstatement

A. Reconsideration

Typically, the SDO's written decision is the final agency action. A respondent may seek to challenge that decision in Federal District Court. Under the debarment regulations, a respondent may request that the SDO reconsider a

decision upon a showing of clear error of fact or law or upon a showing that the decision is arbitrary, capricious, or an abuse of discretion. The SDO may stay the effect of the initial determination pending a decision on reconsideration.

B. Reinstatement

Debarment is a protective remedy; it is not a punishment. Since it concerns present responsibility rather than liability, the rules provide that a respondent may petition for reduction or termination of the debarment period at any time between the initial determination and the expiration of the debarment. The SDO may reduce or terminate a debarment, when there is newly discovered evidence, reversal of the conviction or civil judgment upon which the action was based, bona fide change in ownership or management, elimination of other causes for which the debarment was imposed, or "other reasons the debarring official deems appropriate." See 48 C.F.R. § 9.406-4 (c) and 2 C.F.R. § 180.880.

VIII. Voluntary Exclusion Agreements

Under the nonprocurement debarment rules, the SDO is authorized to resolve actions through the use of a voluntary exclusion. Under a voluntary exclusion, a person agrees to be excluded under the terms of an administrative agreement with DOI. Voluntary exclusions are essentially debarments without the onus of being involuntary. Voluntary exclusions are entered into the SAM with a specific cause and treatment code. Like debarments, voluntary exclusions have Governmentwide effect.

Note that FAR Subpart 9.4 does not include a voluntary exclusion provision. Accordingly, the use of a voluntary exclusion, other than in unusual circumstances, is normally used in actions taken under the nonprocurement debarment rules

IX. Compliance and Ethics Agreement

The DOI debarment program occasionally uses compliance and ethics agreements to resolve suspension and debarment concerns. The agency may consider using such agreements if the circumstances of the matter warrant one. Through the compliance and ethics agreement process, a contractor or participant, who has implemented an enhanced ethics and compliance program to detect and address potential risks to the Government, can remain eligible for awards. The contractor or participant implements strengthened internal governance practices and risk diagnostic tools. The competitive pool does not shrink, and American jobs are preserved.

Discussions that may lead to such an agreement ordinarily can occur in the following way. A respondent may request an opportunity to meet with the OIG DARD and DPM to present information regarding present responsibility and the appropriateness of a compliance and ethics agreement in lieu of suspension or debarment. ARD will then inform the respondent that it should be prepared to

address the extent to which the respondent's compliance and ethics program reflects the elements found in § 8B2 of the Federal Sentencing Guidelines which describe an effective compliance and ethics program. The respondent should also address any corrective actions implemented to strengthen its compliance and ethics program, particularly with regard to the conduct that gave rise to the matter.

The case investigator(s) may attend the meeting as observers. By virtue of their knowledge of the facts that gave rise to the recommendation to the SDO, investigators can often play a valuable role in the discussions and assessments that follow these meetings.

After the respondent's presentation of information, the OIG DPM may negotiate with the respondent or its counsel regarding the proposed terms of a compliance and ethics agreement. The OIG DARD may recommend to the SDO that DOI enter into a compliance and ethics agreement with the respondent in lieu of suspension or debarment. Although it is rare, after the receipt of information from the respondent, the OIG DARD may also recommend that no further action is required to protect the Government's business interests and that the SDO terminate the suspension and/or proposed debarment.

The agreement may include any appropriate term or condition including, but not limited to: acceptance of responsibility for the conduct that gave rise to the agreement; a requirement for a code of ethics; a training program for employees; an audit and internal control program; a compliance program; a mechanism for reporting misconduct; and the hiring of a third party monitor to ensure compliance with the terms of the agreement; and compliance with the respondent's internal control procedures. Violation of the terms of an agreement provides an independent cause for debarment.

An OIG recommendation to the SDO to enter a compliance and ethics agreement is accompanied by the proposed negotiated agreement. The SDO determines whether a compliance and ethics agreement is appropriate in lieu of suspension or debarment to address potential business risks to the Government. The SDO may accept or reject the OIG recommendation, or the SDO may request revisions to the proposed agreement. The SDO is the only DOI official authorized to determine the appropriate administrative action and to resolve suspension and debarment matters through such agreements. The SDO may also directly negotiate these agreements. The DARD may also recommend that no further action is required to protect the Government's business interests.

Section 872 of the Duncan Hunter National Defense Authorization Act of 2009 (Public Law 110-417) requires that all compliance and ethics agreements be entered into the Federal Awardee Performance and Integrity Information System (FAPIIS at www.fapiis.gov) within three (3) working days. PAM staff is responsible for reporting to FAPIIS any signed compliance and ethics agreement, and they must record on the SAM that the respondent is no longer suspended or

debarred. The compliance and ethics agreements are also posted on the debarment page of the PAM website.

X. Conclusion.

We hope this guide will serve as an introduction to the suspension and debarment program at DOI. We provide this guide in order to promote transparency and a general understanding of the roles and responsibilities within the program. For more information, please contact David M. Sims, Debarment Program Director, Office of Acquisition and Property Management. Mr. Sims may be reached by email at david_sims@ios.doi.gov and by telephone at 202-513-0689. To contact OIG's Administrative Remedies Division, please email ARD staff at oig_debarment@doioig.gov.