

**University of California
SAS 112 Key Controls Documentation**

Campus: UCSF

Area	I. Procurement and Suspension and Debarment (A133)
Key Control	Procurements are reviewed to ensure compliance with federally mandated procurement standards, A-102 Common Rule and OMB Circular A-110.
Risk	The federal agency can choose to either, withhold cash payments, disallow all or part of research activity or action not in compliance, terminate awards, withhold further awards or impose additional requirements, per OMB A-110 C62.
Control Objective	To provide reasonable assurance that the procurement of materials and services for federal research awards comply with federal statutes and executive orders for procurement and prohibitions on contracting with entities suspended or debarred, in accordance with relevant provisions in OMB A-102 and A110.
Department or group with primary responsibility	Campus Procurement and Business Contracts
Roles, Responsibilities and Accountability	
<i>(Who performs the control)</i>	<i>(Description of the control steps)</i>
Buyers	<ul style="list-style-type: none"> Regularly reviews vendors for debarment or suspension. Buyers are trained on the procurement requirements and reference UCOP policy (Business and Finance #43 http://www.ucop.edu/ucophome/policies/bfb/bus43.html) for inclusion of clauses and requirements for federal contracts.
Procurement Compliance Manager	<ul style="list-style-type: none"> Reviews the DP (Delegated Department) Report monthly to track information on spending amounts, invoice splitting and large expenditures, with an emphasis on uncovering deviations from established Delegation Authority policies and related policy violations
Office of Sponsored Research	<ul style="list-style-type: none"> Language in sub-award documents state that the subrecipients must comply with all federal regulations. Copies of the contract and references to federal regulations is attached to all contracts. Ensures that all flow-down provisions are passed down to all subcontractors. All federal flow-through subcontract awards issued by UCSF OSR to outside parties contain language which requires the subcontractor to certify that neither it nor its principals are presently debarred, suspended, proposed for debarment, declared ineligible or are voluntarily excluded by any federal department or agency.

Other Department	Other	*
Automated or Manual	Manual	
Frequency	Per contract review and monthly review of Procurement Compliance Manager.	
Special Year-end Activity	None	
Additional Campus Data		
Audit Control Test		
Evidence of Review		
Compensating Control Where Applicable		
Description		
Process		