The Honorable Joseph I. Lieberman
Chairman
Committee on Homeland Security and Governmental Affairs
United States Senate
Washington, DC 20510

Dear Mr. Chairman:

Section 873(a)(7) of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009, Public Law 110-417, requires the Interagency Suspension and Debarment Committee (ISDC) to report to Congress on the Federal suspension and debarment process. The attached report addresses these requirements for fiscal years 2009 and 2010.

Suspension and debarment are the government's most powerful tools to protect taxpayers from entities who engage in dishonest or illegal conduct or are otherwise unable to satisfactorily perform their responsibilities. While the basic Federal policies and procedures governing suspension and debarment in procurement and nonprocurement activities remain sound, reports issued in recent years by agency Inspectors General, and others, serve as important reminders of the heightened attention that agencies must continually give to how these processes are managed. Such attention is essential for ensuring that agencies are able to apply these tools whenever necessary to protect taxpayers from bad actors.

The ISDC provides an important support structure to help agencies implement their debarment and suspension programs. It serves as a forum for agencies to share best practices and lessons learned and assists in coordinating suspension and debarment actions among agencies to facilitate their government-wide effect. The ISDC's activities are overseen by the Office of Management and Budget, which works closely with the ISDC to identify where refinement of current policies or practices may be needed.

Over the past two fiscal years, the ISDC has focused much of its attention on contributing its collective expertise in support of government-wide efforts to enhance information systems designed to protect and strengthen the integrity of procurement and nonprocurement award activities. The ISDC has served as a "best practices" expertise resource center for agencies in the process of developing new suspension and debarment programs. It played an active role in the Spring 2009 launch of the Federal Awardee Performance and Integrity Information System, which is designed to significantly enhance the information available to contracting officers and discretionary assistance, loan and benefit (nonprocurement) program award officials to determine if a potential recipient of federal funds, either through a procurement or nonprocurement transaction, has the requisite integrity to receive such funds. The ISDC has also worked with the General Services Administration on an ongoing project to improve the Excluded Parties List System (EPLS), which identifies the names and addresses of parties excluded from receiving contracts,

certain subcontracts, and federal financial and non-financial assistance. The report discusses these efforts and also provides information on individual agency activity. The ISDC looks forward to working with agencies in their ongoing efforts to manage their debarment and suspension programs in the most effective manner possible and helping the government eliminate fraud, waste, and abuse from its programs and operations.

Sincerely,

David M. Sims
Acting Chair, ISDC

Identical Letter Sent to: The Honorable Susan M. Collins, The Honorable Darrell E. Issa and The Honorable Elijah E. Cummings

Report on Federal Agency Suspension and Debarment Activities

Section 873(a)(7) of the Duncan Hunter National Defense Authorization Act for Fiscal Year 2009, Public Law 110-417, requires the Interagency Suspension and Debarment Committee (ISDC) to report to Congress on the Federal suspension and debarment process. Section 873 calls on the ISDC to report on (1) progress and efforts to improve the suspension and debarment system, (2) agency participation in the Committee's work, and (3) a summary of each agency's activities and accomplishments in the government-wide debarment system. This report addresses these requirements for Fiscal Years (FY) 2009 and 2010.

The ISDC is an interagency body, comprised of Executive Branch organizations that work together to provide support for the implementation of the government-wide system of suspension and debarment. The ISDC was initially created in 1986 to monitor implementation of Executive Order 12549, which established a suspension and debarment system for non-procurement matters. Today, the ISDC serves as both a forum for agencies to discuss policy and procedure regarding suspension and debarment actions taken in connection with either procurement or non-procurement activities and a coordinating body when two or more agencies have an interest in initiating suspension or debarment proceedings pertaining to the same contractor or non-procurement participant (known as the "lead agency" coordination process). The Committee's specific functions are enumerated in section 873 and include:

(1) resolving issues regarding which of several Federal agencies is the lead agency having responsibility to initiate suspension or debarment proceedings and coordinating actions among interested agencies with respect to such action;

(2) encouraging and assisting federal agencies in entering into cooperative efforts to pool resources and achieve operational efficiencies in the government-wide suspension and debarment system;

(3) recommending to the Office of Management and Budget (OMB) changes to the government suspension and debarment system and its rules, if such recommendations are approved by a majority of the Interagency Committee; and

(4) reporting to Congress.

Each of the 24 agencies covered by the Chief Financial Officers Act (CFO Act) are standing members of the ISDC. In addition, nine independent agencies and government corporations participate on the ISDC. A few departments are represented by multiple members. For example, the Department of Defense is represented by each of the military services (i.e., Air Force, Army, and Navy) as well as by several of the larger defense agencies, including the Defense Logistics Agency (DLA), Defense Contract Management Agency (DCMA), and the Office of the Secretary of Defense (DOD).

The ISDC is headed by a Chair and Vice-Chair. The Chair and Vice-Chair are each appointed by OMB for a term determined by OMB. Representatives of member agencies meet monthly to discuss a wide range of matters associated with government-wide suspension and debarment, from current practices, trends, best practices, and recent actions, to use of technology, training, and regulatory and statutory developments. From time to time, the ISDC creates subcommittees, primarily to focus on special projects. One subcommittee, for example, is in the process of examining issues associated with coordinating parallel judicial and suspension and debarment proceedings.

Over the past two fiscal years, the ISDC has focused much of its attention on the functions identified in section 873. Efforts have included increasing agency involvement in the Committee's activities, strengthening the "lead agency" coordination process, exploring agency use of "fact-based" exclusion of contractors and participants, and surveying agencies to gain greater insight into current practices and models that may be replicated. In addition, the ISDC played an active role in the Spring 2009 launch of the Federal Awardee Performance and Integrity Information System (FAPIIS), which is designed to significantly enhance the information available to contracting officers and grants officials to determine if a potential recipient of federal funds, either through a contract or grant, has the requisite integrity to receive such funds. The ISDC has also worked with the General Services Administration (GSA) on an ongoing project to improve the Excluded Parties List System (EPLS), which identifies the names and addresses of parties excluded from receiving contracts, certain subcontracts, and federal financial and non-financial assistance.

This report highlights the ISDC's main activities in FYs 2009 and 2010. It includes appendices identifying actions by agency, including the number of suspensions, debarments, and referrals reported in each of these years.

A. Implementation of section 873

Section 873 codifies key functions of the ISDC. To implement section 873 and create a stronger interagency support structure, the ISDC took several important steps.

First, it worked with members of the Civilian Agency Acquisition Council (CAAC) and the Defense Acquisition Regulations Council (DARC) – i.e., councils that support the Federal Acquisition Regulatory Council in overseeing the Federal Acquisition Regulation (FAR), which establishes government-wide procurement rules – to codify one of its key roles in regulation. In particular, FAR 9.402(d) clarifies that when more than one agency has an interest in the debarment or suspension of a contractor, the ISDC is to "resolve the lead agency issue and coordinate such resolution among all interested agencies prior to the initiation of any suspension, debarment, or related administrative action by any agency." The lead agency coordination process enhances the efficiency of the suspension and debarment process, by helping agencies from needlessly expending funds for duplicative actions or from working at cross purposes, and by furthering the collaboration needed to support a government-wide system designed to address systemic problems. The ISDC alerts agencies to actions planned by other agencies and helps to focus the lead for action in the agency with the most direct and appropriate interest. Lead coordination can also continue beneficially after action initiation. For example, if an

administrative agreement is being considered by the lead agency, coordination can allow other agencies to contribute useful information regarding agreement terms beneficial to the larger government award community. This allows the lead agency to understand the steps being taken by the contractor or nonprocurement award participant so that the agency can determine if such steps represent appropriate risk mitigation to help the entity qualify as a presently responsible source.

Second, the ISDC has increased agency involvement in its activities. As noted in the introduction, each of the 24 CFO Act agencies is a standing member of the ISDC. These agencies are responsible for almost all federal procurement spending -- close to 99% of the obligations reported in the Federal Procurement Data System. They are also responsible for overseeing the vast majority of dollars awarded through federal assistance programs.[1] Several independent agencies and government corporations also participate on the ISDC.[2] A number of agencies with Offices of Inspectors General also send representatives from these offices to participate in ISDC meetings. The broadened membership base allows the ISDC to perform more effectively as a support structure for coordinating actions and a forum for agencies to share best practices and lessons learned.

B. Survey of current practices

To improve insight into current practices and to create a baseline against which to measure progress, the ISDC surveyed its members both in FY 2009 and FY 2010. Questions focused on the following key topics:

- actions taken – specifically, the number of referrals, declinations, suspensions, "proposed for debarments," and debarments; and the use of voluntary exclusions, "show cause notices," and administrative agreements;
- resources dedicated to suspension and debarment programs;
- internal agency controls, and
- training and outreach.

A number of collateral questions were also posed, such as use of debarments for periods exceeding three years, and activities associated with the administration of statutory exclusions.

Highlights of member responses are summarized below. Information on individual agency activities is set forth in the appendices. Unless otherwise stated, information represents the actions of the CFO Act agencies only.

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[1] The CFO Act agencies and various activities associated with their debarments and suspensions are set forth in the appendices of this report.

[2] These agencies include: AMTRAK, Corporation for National and Community Service, Export-Import Bank, Institute for Museum and Library Services, National Endowment for the Arts, National Endowment for the Humanities, National Labor Relations Board, Peace Corps, and Security and Exchange Commission.

1. *Suspension and debarment actions*

As shown in Table 1, CFO Act agencies issued 1,029 suspensions in FYs 2009 and 2010. There were a total of 2,695 parties proposed for debarment, and 3,152 debarments. In each of these years, the Army, DLA, the Department of Homeland Security (DHS), the Environmental Protection Agency (EPA), and the Office of Personnel Management (OPM) were among the top agencies in terms of number of debarments. See Appendix 1 for information on each agency's activity in FY 2009 and Appendix 2 for activity in FY 2010.

Table 1. CFO Act Agency Debarment and Suspension Actions

Actions	FY 2009	FY 2010	Total
Suspensions	417	612	1029
Proposed for Debarment	750	1945	2695
Debarments	1501	1651	3152

Six agencies (USDA, HHS, HUD, AID, EPA, and NASA) reported entering into Voluntary Exclusion Agreements during the reporting period, whereby the party voluntarily agreed to exclusion from eligibility to receive government contracts or subcontracts and participation in nonprocurement transactions. Voluntary Exclusions are a tool used by agencies under the nonprocurement debarment rule rule.[3] The FAR does not contain a parallel provision, but such exclusions are government-wide in effect and are entered into EPLS. HHS reported entering into ten such voluntary exclusion agreements during the two reporting periods; the other agencies each reported having entered into less than five such agreements during the two-year period.

While debarments generally do not exceed three years in duration, some agencies reported that they imposed debarments with longer periods where circumstances warranted in order to protect the public's interest in safeguarding public funds. Each of the military services and DLA reported that they had issued at least one debarment in FY 2009 or FY 2010 with a period of anywhere from 10 to 27 years. DHS reported one debarment issued in FY 2010 for 16 years. EPA reported issuing a 15 year debarment in FY 2009 and a 20 year debarment in FY 2010.

Seven agencies reported issuing "show cause" letters during the reporting period. See Table 2. Show cause letters are a pre-notice investigatory tool which advises an entity that it is being considered for suspension or proposed debarment and identifies the assertion of misconduct that has been brought to the attention of the debarring official. Typically, such letters give an entity an opportunity to respond within a specific period of time. They are used almost exclusively in the procurement community because notices of proposed debarment under the FAR immediately exclude a contractor from being considered for additional government contracts. By contrast, a notice of proposed debarment under the nonprocurement debarment rule does not result in immediate award ineligibility, so an agency may use the notice of

[3] The nonprocurement debarment rules may be found at 2 CFR in Part 180 and accompanying individual agency implementing regulations.

proposed debarment itself in the nonprocurement community to accomplish the same purpose as a show cause letter.

Table 2. Show Cause Letters

Agency	FY 2009	FY 2010
DOD	30	40
DOJ	4	1
DOL	1	0
AID	2	0
EPA	6	4
GSA	20	7
SBA	7	6

Approximately three-quarters of the agencies reported referrals to the suspension and debarment official (SDO) during the reporting periods.[4] Referrals ranged from as few as one to more than 400 at the Army and 1,000 at the Department of Housing and Urban Development (HUD). In FY 2009, agencies cumulatively acted on 90 percent of the reported referrals. In FY 2010, agencies acted on 84 percent of referrals. For the combined reporting years the percentage of "declinations" was 13 percent. See Table 3. For purposes of this report, acting on a referral generally includes any one or more of the following actions by the agency's suspension and debarment official (SDO): issuing a show cause letter; suspending the party; proposing the party for debarment; negotiating an administrative agreement to resolve responsibility concerns; or determining, upon review of the record regarding existence of cause and any mitigating factors and remedial measures present, that imposition of debarment is or is not warranted. See Appendices 1 and 2 for a summary of referrals and declinations by agency.

Table 3. Referrals and Declinations

Action	FY 2009	FY 2010
Referrals	1218	2844
Declinations	116	469
Percentage of Referrals Declined	10%	16%

The wide range in the number of referrals reported among the different agencies is a reflection, in part, of the fact that agency suspension and debarment programs are organized in a variety of ways driven by the particular agency's mission and structure. In some agencies, such as the Navy and Air Force, case development, notice issuance, and final determination of whether exclusion is warranted occur within the same organizational unit of the agency. In those situations, there is generally no independent referral and a decision not to act is somewhat akin to the exercise of prosecutorial discretion. Under this type of organizational structure, case closure may be a relatively informal process which may not readily lend itself to a formal declination determination. Other agencies, such as the Department of Interior (DOI), DLA, and EPA separate the case development function from the SDO decision process. Under this type of

[4] Some agencies which have active suspension and debarment programs, such as Air Force, did not report referral numbers.

organizational structure, a written case referral is ordinarily forwarded to the SDO for consideration.

The variation in the percentage of action declinations is a reflection of the discretionary nature of the process and the need for SDOs to determine, on a case-by-case basis, whether action is required to protect the Government's interests and ensure the Government only enters into relationships with responsible entities. The SDO in reaching a final decision must consider whether the information presented at that stage shows the existence of a cause for action and proceeding to issue an action notice is appropriate. A referral from a field investigator or contracts official may be unsubstantiated, or in other cases it may have merit but, in the assessment of the SDO based upon the available information, initiation of a suspension or debarment action is not warranted for protection of the Government's interests

2. *Administrative agreements*

In addition to issuing suspensions and debarments, and proposing parties for debarment, several agencies reported entering into administrative agreements: DOD (including each of the Military Services) EPA, GSA, DHS, DOI, the Small Business Administration (SBA), and the Department of Transportation (DOT). See Table 4. Administrative agreements, sometimes referred to as administrative compliance agreements, ordinarily are considered after the contractor or participant has responded to a notice of suspension or proposed debarment. If properly structured, an administrative agreement creates an incentive for a company to improve its ethical culture and business process in order to avoid debarment and, in turn, provides the government with access to a responsible source.

While administrative agreements will vary by agency and individual settlement, all will require the entity to take certain actions, such as implementation of enhanced internal corporate governance practices and procedures, and adoption of compliance, ethics, and reporting programs. Agreements may also call for the use of independent third party monitors. The Department of the Air Force, for example, implemented a new policy in its administrative agreements for contractors to engage consultants to recommend process improvements to their business practices and to assess the contractor's compliance in order to verify its present responsibility prior to the termination of the agreement. The agreements typically include a provision that makes violation of the agreement a separate cause for debarment in addition to the original action notice basis.

Table 4. Administrative Agreements

Agency	FY 2009	FY 2010
Air Force	3	4
Army	8	8
EPA	10	4
GSA	0	5
DHS	3	1
DOI	0	2
Navy	11	1
SBA	0	3
DOT	0	2

3. *Management, internal controls, and training*

Reports issued in recent years by agency Inspectors General, and others, serve as important reminders that management and resources devoted to these measures are inconsistent across agencies. In some cases, for example, suspension and debarment work has been treated as a collateral duty, resulting in unnecessary delays in processing cases. In other cases, lack of central monitoring and oversight has hampered the agency's ability to identify problems and take corrective action in a timely manner. These findings confirm there is much room for improvement and work that needs to be done.

Progress is apparent. More agencies are establishing formal suspension and debarment programs, dedicating greater staff resources to handle referrals and manage cases, strengthening policies, providing training, and acting decisively to root out illegal behavior and irresponsible actors. For example:

- DOI has implemented a proactive debarment program with dedicated positions in its Office of Inspector General and a full time debarment program manager in the Office of Acquisition and Property Management to assist the SDO with debarment and suspension action issuance and resolutions. The new program has developed and implemented enhanced program practices and procedures for case initiation and resolution and created an electronic case management tracking system for tracking suspension and debarment actions. During the combined FY 2009 and FY 2010 reporting periods, DOI's SDO took 69 exclusion actions, including the first oral presentations by respondents of matters in opposition and the first use of administrative agreements to resolve exclusions while providing the Department with effective oversight over a contractor's performance.

- The Agency for International Development (AID) has made concerted efforts to address flaws and constraints in its suspension and debarment process by establishing a "partner compliance and performance oversight" division, which maintains a dedicated staff to focus on suspension and debarment actions and refer cases to the agency's SDO.

- Department of Transportation (DOT) put a new framework in place that requires the operating administrations to take action within 45 days of notification of an action that would warrant possible suspension or debarment, and implements a new data collection system that will help the senior management of the Department monitor the performance of suspension and debarment officers.

- SBA has ramped up efforts to remove bad actors from its small business programs and ensure benefits of small business contracting programs go to the intended communities. The agency now employs full-time personnel to work suspension and debarment issues exclusively. Pending full investigation by the Agency's Office of Inspector General, it suspended a major government contractor and two small businesses based on evidence that they had knowingly violated small business contracting laws.

All of these agency steps serve as a warning to would-be lawbreakers and poor performers that the government is acting decisively to root out illegal behavior and irresponsible actors. With the support of the ISDC, agencies are helping each other and adopting best practices.

Approximately two-thirds of the CFO Act agencies reported in FY 2009 and 2010 having internal agency controls in place to support their suspension and debarment efforts. See Appendix 3. These include supplements to the FAR, standard operating procedures, handbooks, policy papers, bulletins, internal suspension and debarment councils to process referrals, and regular conference calls with agency fraud counsels. Seventeen agencies reported using electronic case management systems to track their suspension and debarment actions and one agency, DOI, reported creation of both SDO and Inspector General action referral tracking systems.

Sixteen agencies provided training to their SDO personnel in FYs 2009 and 2010 while twelve provided training for their acquisition and grants management workforce. A number of agencies took advantage of existing suspensions and debarment training courses, such as the National Suspension and Debarment Training Program offered by the Federal Law Enforcement Training Center, the DOD Procurement Fraud Working Group Conference, Army Judge Advocate General's School biennial course on Procurement Fraud and the suspension and debarment workshop sponsored jointly by the National Science Foundation and the Council of Inspectors General on Integrity and Efficiency. Agencies supplemented training efforts with various forms of outreach, including suspension and debarment newsletters, acquisition alerts, and informational websites.

C. Systems improvements

In FYs 2009 and 2010, ISDC actively participated in efforts led by the CAAC and DARC to develop rules and associated protocols for the launch of FAPIIS, a new one-stop source for a comprehensive range of data, such as information on suspensions and debarments, contract terminations, and contractor disclosure of adverse criminal, civil, and administrative actions. Federal contracting officials must review the information in FAPIIS in connection with any pending contract award over the simplified acquisition threshold ($150,000) for the purpose of determining if the contractor is presently responsible, and they must document the contract file to indicate what action was taken as a result of review of the information in FAPIIS and what role that information played in any responsibility determination. In addition, they must notify, prior to proceeding with award, the agency official responsible for initiating debarment or suspension, if information is identified in FAPIIS that appears appropriate for that official's consideration. The ISDC chair participated as an ad hoc advisor to the FAR team during the drafting of the rule – serving as the primary liaison from the suspension and debarment community as the team considered management issues associated with the roll-out of FAPIIS, including ways to best minimize the risk of de facto debarment. The ISDC also provided advice on how best to capture information on administrative agreements.

The ISDC also worked with GSA to help improve EPLS, the government-wide web-based system that is used both to report suspension and debarment actions and to serve as a key protection for agencies that might be considering award to a listed entity. As documented in a report by the Government Accountability Office, suspended and debarred businesses have sometimes received federal funds due to a variety of shortcomings: (i) agency officials failing to search EPLS, (ii) businesses circumventing the terms of their exclusion by operating under

different identities, and (iii) late or inadequate reporting to EPLS. GSA, which serves as the program manager for the EPLS system, has created an agency governance board to monitor and manage changes to the system. The board has implemented a number of modifications to strengthen controls. For example, agencies must use standard contractor identification numbers for all actions entered into the system, which should help prevent companies from operating under different identities. In addition, agencies are required to periodically review their points of contact information to make sure it is up to date. SDOs are also now required to enter actions on EPLS within three rather than five working days. For its part, the ISDC formed a subcommittee to explore opportunities for streamlining cause and treatment (CT) codes. Currently, there are over 70 CT codes that agencies choose from to help categorize entries into the EPLS system. Commencing in FY 2010, in response to a GAO audit, GSA began a review of the proliferation of existing CT codes to simplify identification and analysis. The ISDC Vice Chair and other members participated actively in the effort to create a simplified set of codes focused around a limited number of categories based on the essential status and effect information which contracting officers and award officials need to ascertain by an EPLS check.

Appendix 1. Suspension & Debarment Actions in FY 2009[1]

Agency	Referrals	Declinations[2]	Suspensions	Proposed for Debarment	Debarments
USDA	43	0	28	16	14
Commerce	1	1	0	0	0
Defense					
Air Force	*	*	68	78	57
Army	400[3]	*	151	115	124
DLA	*	2	48	211	131
Navy	106	0	12	39	44
DHS	156	13	1	73	64
Education	*	*	*	*	*
Energy	7	0	7	7	6
HHS	2	0	0	2	1
HUD	*	*	*	*	*
Interior	32	0	4	5	4
Justice	13	4[4]	0	4	4
Labor	0	0	3	0	24
State	5	1	0	4	4
Transportation	15	0	13	1	1
Treasury	1	1	0	0	0
VA	4	0	0	5	3
AID	10	2	10	5	0
EPA	196	1	28	64	86
GSA	154	70	43	62	51
NASA	17	1	0	17	12
NRC	*	*	*	*	*
NSF	11	0	0	11	11
OPM	*	*	4	*	832
SBA	45	20	1	31	28
SSA	0	0	0	0	0
Total	**1218**	**116**	**417**	**750**	**1501**

[1] Data was derived from ISDC surveys of agency suspension and debarment practices.
[2] For purposes of this report, declination means the agency's SDO did not take any of the following actions in response to a referral: issuing a show cause letter, suspending the party, proposing the party for debarment, negotiating an administrative agreement to resolve responsibility concerns or debarring the party.
[3] The Army reported that the number of referrals was in excess of 400. For purposes of the total, it is assumed that the number is 400.
[4] Three DOJ referrals were declined following lead agency coordination in which HUD took lead and initiated debarment actions.
* Data not provided by agency.

Appendix 2. Suspension & Debarment Actions in FY 2010[1]

Agency	Referrals	Declinations[2]	Suspensions	Proposed for Debarment	Debarments
USDA	47	12	7	31	13
Commerce	0	0	0	0	0
Defense					
Air Force	*	*	83	159	111
Army	400	*	133	170	125
DLA	*	0	140	166	169
Navy	*	*	26	79	38
DHS	193	17	9	206	154
Education	*	15	8	38	19
Energy	24	2	22	22	22
HHS	4	0	0	4	2
HUD	1142	399	84	173	85
Interior	35	0	12	48	45
Justice	5	3	0	3	2
Labor	0	0	0	9	0
State	8	1	1	3	3
Transportation	7	0	2	0	3
Treasury	1	0	1	0	0
VA	16	3	4	9	8
AID	12	0	0	16	3
EPA	159	5	44	60	87
GSA	40	9	24	19	46
NASA	18	0	3	15	11
NRC	0	0	0	0	0
NSF	11	0	0	11	11
OPM	683	0	3	680	678
SBA	39	3	6	24	16
SSA	0	0	0	0	0
Total	**2844**	**469**	**612**	**1945**	**1651**

[1] Data was derived from ISDC survey of agency suspension and debarment practices.
[2] For purposes of this report, declination means the agency's SDO did not take any of the following actions in response to a referral: issuing a show cause letter, suspending the party, proposing the party for debarment, negotiating an administrative agreement to resolve responsibility concerns or debarring the party.
* Data not provided by agency.

Appendix 3. Actions and Infrastructure to Support Suspension & Debarment Activities FYs 2009-2010

	Internal agency controls in place		Officials receiving training		Tools used in addition to suspensions & debarments		
Agency	Policies and/or Procedures for S&D	Electronic Database for S&D Cases	Suspension & Debarment Personnel	Acquisition & Grants Management Officials	Show Cause Notices	Administrative Agreements	Voluntary Exclusions
USDA	✓	✓	✓	✓			✓
Commerce	✓		✓	✓			
Defense*							
Air Force	✓	✓	✓	✓	✓	✓	
Army	✓	✓	✓	✓	✓	✓	
DLA	✓	✓	✓	✓	✓	✓	
Navy	✓	✓	✓	✓	✓	✓	
DHS	✓	✓	✓	✓	✓	✓	
Education							
Energy		✓	✓	✓			
HHS	✓	✓				✓	✓
HUD	✓	✓	✓				✓
Interior	✓	✓	✓	✓		✓	
Justice			✓	✓	✓		
Labor	✓	✓	✓	✓	✓		
State	✓		✓				
DOT	✓	✓		✓			
Treasury		✓					
VA	✓						
AID	✓	✓	✓		✓		✓
EPA	✓	✓	✓	✓	✓	✓	✓
GSA	✓	✓	✓		✓	✓	
NASA	✓	✓	✓	✓			✓
NSF		✓	✓	✓			✓
NRC	✓	✓					
OPM		✓					
SBA			✓		✓		
SSA							
Total	16	17	16	12	8	6	7

*The totals reported on this table count all of the Defense agencies together as one agency.