

# City of Hawthorne Federal Grant and Equitable Sharing Purchasing Policy

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## Federal Grant Compliance — System for Award Management (SAM.gov)

### Policy Statement

To comply with federal grant and equitable sharing funds, the Hawthorne Police Department shall maintain an active registration in the federal System for Award Management (SAM.gov). The Department shall also ensure that any contractors, subrecipients, or vendors paid with federal grant and equitable sharing funds are properly registered in SAM.gov and not suspended or debarred from federal transactions.

### Procedures

#### 1. Department Registration

- The Hawthorne Police Department shall complete and maintain active registration in SAM.gov prior to applying for any federal grant.
- The registration shall be renewed annually before its expiration to prevent any disruption in eligibility for federal funding.
- The Department's Grants Coordinator(s) shall monitor registration status and complete all updates as required.

#### 2. Verification of Contractors and Subrecipients

Before awarding any contract, subcontract, or subaward using federal grant funds, the Department shall verify that each contractor or subrecipient:

- Holds an active SAM.gov registration; and
- Is not listed on the federal Excluded Parties List or other debarment databases.
- A record of each verification shall be saved in the grant file for compliance purposes.

#### 3. Recordkeeping

- The Department shall keep copies of SAM.gov registration confirmations, renewals, and contractor/subrecipient exclusion checks for at least three years after the closeout of the grant or longer if required by the grant terms.
- These records shall be made available for audit, review, or monitoring upon request.

#### 4. Governing Regulations

This policy is established to fulfill the requirements of:

- 2 CFR Part 25 — Universal Identifier and SAM
- 2 CFR 200.300 — Uniform Guidance for Federal Awards

- FAR Subpart 4.11 — System for Award Management

Effective Date: July 2, 2025

Review Cycle: This policy shall be reviewed annually by the Grants Manager and the Fiscal Administrator to ensure continued compliance with applicable federal regulations.