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# Policy Update



## Pre-award Risk Assessment for Subrecipient(s) ADS 303.3.21



- ✓ Mandatory Pre-award Risk Assessment for subrecipient(s), prior to obtaining Agreement Officer's (AO) approval
- ✓ Prime Recipient to confirm compliance with risk assessment requirements for subrecipient(s)

### --Why--

To Prevent Specially Designated Nationals (SDN) and Blocked Persons from receiving the U.S. Government funds



### --Responsibility--

Prime Recipients of USG awards are now responsible for the following pre-award risk assessment checks on their Subrecipient(s):

1. No active exclusions in System for Award Management (SAM)
2. No appearance on SDN and Blocked Persons List maintained by the U.S. Treasury for the Office of Foreign Assets Control, sometimes referred to as the "OFAC List"
3. Not listed on United Nations Security designation List





## --Required Tasks for the Prime--

### SAM Check:

The name of the Subrecipient can be checked via SAM website; by clicking on the Tab: “Data Access - Exclusions Extract Data Package” Website Link: [https://www.sam.gov/portal/SAM/DATA\\_ACCESS](https://www.sam.gov/portal/SAM/DATA_ACCESS)

*Note: SAM provides a comprehensive list of firms & organizations that are ineligible to receive the U.S. Government funds. The subawardee is NOT required to register in SAM.*



### SDN and Blocked Persons List maintained by the U.S. Treasury for the Office of Foreign Assets Control Check:

The name of the Subrecipient’s Key Personnel can be checked via link: <https://sanctionssearch.ofac.treas.gov/>



### United Nations Security Designation List Check:

The name of the Subrecipient and Key Personnel can be checked via below link: [https://www.un.org/sc/suborg/en/sanctions/1267/aq\\_sanctions\\_list](https://www.un.org/sc/suborg/en/sanctions/1267/aq_sanctions_list)



Upon conducting the above checks, Prime Recipients must confirm compliance with risk assessment to the Agreement Officer

### For More Information Please Refer To:

- Automated Directive System (ADS) 303.3.21 – Subawards
- USAID/INDIA Implementing Partner Notice (IPN) - Notice 1 - ROAA-IPN-2018-01, Policy revision in ADS 303.3.21