Sanctions System Flowchart

**EARLY TEMPORARY SUSPENSION** (Optional – Before Investigation Concluded)

Integrity Vice Presidency (INT) submits Request for Temporary Suspension to Suspension and Debarment Officer (SDO).

SDO reviews Request to determine if sufficient evidence to support a finding of Sanctionable Practice and a recommended debarment of two years or longer.

- **Sufficient Evidence**
  - SDO issues Notice of Temporary Suspension to Respondent. Respondent temporarily suspended for 6 months upon issuance. Temporary suspension posted on Client Connection.
  - Respondent may submit a Preliminary Explanation in opposition to temporary suspension.
  - At any time during temporary suspension, if SDO determines, based on new information, that there was manifest error or clear basis for termination.
  - INT may request that SDO extend temporary suspension from 6 months to 1 year. SDO advises the Respondent of any such extension prior to last day of initial 6-month period.

- **Insufficient Evidence**
  - SDO does not issue Notice of Temporary Suspension. INT may submit revised Request for Temporary Suspension to SDO.

**SANCTIONS PROCEEDINGS** (1st Tier – SDO Phase)

INT may request that SDO extend temporary suspension from 6 months to 1 year. SDO advises the Respondent of any such extension prior to last day of initial 6-month period.

SDO issues Notice of Temporary Suspension to Respondent. Respondent temporarily suspended for 6 months upon issuance. Temporary suspension posted on Client Connection.

- **Within 30 days of delivery of Notice**
  - Respondent may submit a Preliminary Explanation in opposition to temporary suspension.
  - If SDO determines, based on new information, that there was manifest error or clear basis for termination.

- **Within 5 months of issuance of Notice**
  - SDO may decide to terminate temporary suspension upon consideration of Preliminary Explanation.

- **Within 6 months (or 1 year with extensions) of issuance of Notice**
  - SDO may decide to terminate the temporary suspension.

INT may submit Statement of Accusations and Evidence to SDO.

- **If early temporary suspension already in effect, temporary suspension automatically extended.**

SDO reviews Statement of Accusations and Evidence to determine if sufficient evidence to support finding of Sanctionable Practice.

- **Sufficient Evidence**
  - SDO issues Notice of Sanctions Proceedings (including recommended sanction) to Respondent. If recommended sanction exceeds 6 months, Respondent temporarily suspended upon issuance. Temporary suspension posted on Client Connection.
  - Within 30 days of delivery of Notice
    - Respondent may submit Explanation as to why Notice should be withdrawn or recommended sanction revised.
  - Within 30 days of receipt of Explanation
    - SDO may revise recommended sanction and/or terminate temporary suspension.

- **Insufficient Evidence**
  - SDO does not issue Notice of Sanctions Proceedings. INT may submit revised Statement of Accusations and Evidence to SDO.
  - Within 30 days of receipt of Explanation
    - SDO may withdraw Notice for manifest error or insufficiency of evidence. Proceedings are closed. INT may submit revised Statement of Accusations and Evidence to SDO if new evidence available.
SANCTIONS PROCEEDINGS (2nd Tier – Sanctions Board Phase)

Within 90 days of delivery of Notice

Respondent contests allegations and/or recommended sanction by sending Response to Sanctions Board. If Respondent desires hearing, must request in Response.

Within 30 days of submission of Response

INT may submit Reply in support of Notice to Sanctions Board. If INT desires hearing, must request in Reply.

Within a reasonable time frame

Respondent or INT may submit additional evidence (together with brief argument), if authorized by the Sanctions Board Chair.

Respondent or INT may submit additional arguments and evidence in response to supplemental submission of other side, if authorized by Sanctions Board Chair.

Upon reasonable notice

No hearing request

Sanctions Board hearing

Sanctions Board deliberations

Sufficient Evidence

Sanctions Board issues final decision and imposes sanction.

Insufficient Evidence

Proceedings terminated. INT may submit revised Statement of Accusations and Evidence to SDO if new evidence available.

Identity of sanctioned parties and corresponding sanctions are publicly disclosed.

Respondent does not contest. Sanction recommended by SDO is imposed.

Identity of sanctioned parties and corresponding sanctions are publicly disclosed.