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SAM.gov Exclusions Screening: Match, Scope, and Date

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Executive Summary

SAM.gov exclusions screening should produce a dated finding about a specified legal entity, supported by identity evidence and the record's stated scope. A search-name match alone is insufficient. The Federal Acquisition Regulation (FAR) directs inquiries about listed entities to the agency or authority that took the action. (www.ecfr.gov) The FAR calls for records containing identity, issuing authority, cause or authority, effect, termination date, identifiers, and agency contact information. Those fields answer different questions and should remain separate in an acquisition research file. (www.ecfr.gov)

The important public-access limitation is **active records only**. Current Federal Service Desk (FSD) instructions say only active exclusions are publicly searchable, and its printing guidance restricts inactive-record searches to signed-in federal users. (www.fsd.gov) An identifier search also needs a name-search backstop because some exclusion records lack identifiers. (www.fsd.gov) A defensible negative finding therefore reads: no matching public active exclusion found using the documented searches at the recorded time. It does not establish a complete historical record or determine award eligibility. The General Services Administration (GSA) public Exclusions Application Programming Interface (API) likewise returns only active records. (open.gsa.gov)

The date analysis must distinguish the exclusion's **Active Date**, **Termination Date**, database creation or modification dates, and the analyst's retrieval timestamp. GSA's extract documentation distinguishes activation from creation; its API documentation also treats activation, creation, update, and termination as separate fields. (open.gsa.gov) The baseline FAR requires entry within **3 working days** after effectiveness. (www.acquisition.gov) It generally requires updates within **5 working days** after modification or rescission. (www.acquisition.gov) These are agency data-entry requirements, not a guarantee that a search is a real-time clearance. Current applicability also needs care: Revolutionary FAR Overhaul (RFO) model text becomes applicable through agency class deviations. (www.acquisition.gov)

For private equity (PE) origination, the recommended disposition is a documented research state: no matching public hit after a defined search, possible name-only hit, matched active record, matched historical evidence, or unresolved scope. A matched active record should pause any research conclusion that assumes

unrestricted contracting and go to federal-procurement counsel. Existing-contract treatment, new awards, options, and affiliate coverage require separate analysis; the FAR permits some existing contracts to continue and sets specific conditions for extending debarment to affiliates. (www.ecfr.gov) The worksheet and decision ladder below preserve that distinction without creating an automated eligibility score.

Introduction and Background

An origination analyst screening a government-services business often encounters several apparently reassuring facts: a recognizable trading name, a federal identifier, an entity registration, and historical awards. Each answers a narrower question. GSA distinguishes obtaining a **Unique Entity Identifier (UEI)** from completing entity registration. (www.gsa.gov) USAspending describes recipient profiles as information about government spending, including related recipients that may have different identifiers. (www.usaspending.gov) Neither source is a substitute for examining the exclusion record associated with the exact entity being researched.

This report addresses a specific decision: whether an apparent SAM.gov exclusion belongs to the acquisition candidate, what the accessible record actually says, and which uncertainties require escalation. It does not assess any named company's exclusion status. Docket's perspective is that of a provider of acquisition-target research for PE teams; the deliverable considered here is a reviewable finding with its limitations visible. The subject here is exclusion-record interpretation, rather than a general guide to corporate identity or a reconstruction of contract revenue.

The **System for Award Management (SAM)** covers information serving different purposes. Defense acquisition guidance, for example, treats SAM as an authoritative source for contractor identity elements including legal business name, doing-business-as name, identifiers, and addresses. (www.acq.osd.mil) Separately, FAR exclusion provisions govern the consequences of specified listings and include exceptions and timing considerations. (www.ecfr.gov) Combining these subjects into a single “SAM checked” field would hide what was actually examined.

The same discipline applies across screening systems. The Department of Health and Human Services Office of Inspector General (OIG) distinguishes its **List of Excluded Individuals/Entities (LEIE)** from SAM's multi-agency information. (oig.hhs.gov) California's contractor licensing service separately checks license status by business name. (cslb.ca.gov) These are distinct research questions. The protocol below uses public sources inspected for this report as of October 2026 and identifies where public access, source age, or agency-specific rules limit the conclusion.

Key Changes: Interpret Identity, Scope, and Time Separately

Change the unit of analysis from a name to an entity

The proposed changes in this section concern the research workflow. They should not be read as a claim that a new screening law has just taken effect. Begin with the legal entity intended for screening and retain its connection to the trading name used in the target list. New York describes an assumed name as a doing-

business-as name, commonly abbreviated **DBA**. (dos.ny.gov) California makes formation records, amendments, and other entity documents available, providing evidence with which to examine a name change. (www.sos.ca.gov)

Build a compact identity packet before searching:

- **Screening entity:** Exact legal name, jurisdiction, registry number, and entity type.
- **Name history:** Current DBA, prior legal names, and the source connecting each name.
- **Identifiers:** Known UEIs and Commercial and Government Entity (CAGE) codes, each with provenance.
- **Addresses:** Entity address, date observed, and whether it represents an office, facility, or mailing address.
- **Corporate boundary:** Parent, subsidiary, division, or operating entity included in this screen.
- **Uncertainty:** Missing links, conflicting addresses, and relationships that remain unverified.

These are proposed worksheet fields. They organize the evidence rather than create a legal matching standard. The Defense Logistics Agency (DLA) describes CAGE as identifying a facility at a specific location, so an analyst should preserve location context rather than casually treat a code as the identity of an entire corporate group. (www.dla.mil) Even a matching address is corroboration, not a complete identity conclusion: the Office of Foreign Assets Control (OFAC) official matching guidance observes that multiple businesses may share an address. That caution belongs to OFAC's guidance and is useful here as an evidence principle, not as a SAM-specific legal test. (ofac.treasury.gov)

Separate the action label from its effect

SAM's Prohibition/Restriction guidance points readers to agency notes in **Additional Comments** and, if notes are absent, to the agency. (sam.gov) Treat the label as a route into the record, not a complete statement of the restriction's reach.

The nonprocurement rules add another boundary: qualifying FAR exclusions can have reciprocal effects in covered federal nonprocurement transactions. (www.ecfr.gov) FEMA's guidance explains that some recipient and subrecipient contracts can be covered transactions. (www.fema.gov) Analysts should identify the transaction setting and leave the application of those rules to counsel.

Separate current visibility from historical evidence

GSA's public API returns active records only. (open.gsa.gov) A PE researcher should describe any historical document actually obtained, its source and date, and whether the underlying agency information was verified. The existence of an old document does not establish current status; an empty public search does not establish that no past action ever existed. Those are different evidence states and should have different dispositions.

Implementation Considerations and Process Changes

The Department of the Interior (DOI) maintains an official help hub linking search, no-result, quick-start, and printing guidance. (www.doi.gov) It is a useful starting point, but linked documents must be checked against current FSD instructions. During this research, an older linked guide used legacy identifier terminology,

whereas the current quick-start attachment described additional name searches and access limitations. The procedural recommendations here follow the current attachment. (www.fsd.gov)

The live SAM exclusions landing page was inspected. It presented a search interface asking users to supply criteria; this inspection did not establish any particular firm's status. (sam.gov) Current FSD guidance describes selecting **Entity Information**, then **Exclusions**, and searching by UEI, CAGE, or legal business name. (www.fsd.gov) Use the following reproducible sequence:

1. **Freeze the entity:** Write the exact legal entity and the business unit being screened before entering a query.
2. **Record access conditions:** Save the timestamp and time zone, public or authenticated access, and the source/interface used.
3. **Select the exclusions domain:** Confirm that the result set is exclusions rather than entity registrations or another information category.
4. **Search identifiers separately:** Use the known UEI and CAGE or North Atlantic Treaty Organization Commercial and Government Entity (NCAGE) code, retaining the criteria and returned result count.
5. **Search the legal name:** Run an additional name search even when an identifier search returns nothing.
6. **Search supported variants:** Check documented DBAs and former names separately, preserving the connection to the target entity.
7. **Inspect plausible records:** Compare identity fields, classification, agency, scope, and dates; retain the record identifier and URL.
8. **Write the bounded result:** State the search coverage, identity conclusion, unresolved questions, and escalation owner.

Steps involving identifier and name searches reflect current official guidance. The quick-start document warns that identifiers are not present on every exclusion record and that restricting classification can omit differently classified records. (www.fsd.gov) Start broadly enough to see those possibilities; if filters are subsequently used, retain them so another reviewer can reproduce the result. Current API documentation distinguishes **Individual**, **Firm**, **Vessel**, and **Special Entity Designation** classifications. (open.gsa.gov)

Public searching does not require signing in, but downloading and retaining records involves additional interface functions. FSD describes downloading search results or an individual record while signed in. (www.fsd.gov) Its no-active-exclusion documentation guidance calls for a Portable Document Format (PDF) file showing the current date, entered criteria, and result count. (www.fsd.gov) Retain that output alongside the identity evidence, rather than storing only a generic screenshot captioned “no exclusions.”

Avoid making an entity-registration panel the entire screen. FSD describes an exclusion-association message tied specifically to the entity's UEI. (www.fsd.gov) Given the documented possibility of identifier-free exclusions, that association check should accompany the broader search. Any inaccessible record or failed search should be recorded as unavailable, with its time and reason, rather than converted into a negative finding.

Read the Exclusion Record Field by Field

An exclusion record contains both identity information and information about the action. FAR 9.404 expressly separates the issuing authority, cause or legal authority, effect, termination date, and agency contact. (www.ecfr.gov) The current RFO model additionally makes the identity description explicit as legal business name and physical address. (www.acquisition.gov) A reviewer needs both sets of information to assess what the public evidence supports.

For the specialized order layout cited below, FASCSA means the Federal Acquisition Supply Chain Security Act.

Table 1 maps source fields to bounded research conclusions and the questions that remain open. It is an analyst worksheet design, not an interpretation of any specific record.

Field or evidence	Permissible research conclusion	Unresolved question or next check
Legal name, address, identifiers, cross-references	The displayed identity agrees, conflicts, or remains incomplete relative to the entity packet.	Is this the contracting entity, a division, a related company, or a different party? RFO record requirements identify legal name and physical address. (www.acquisition.gov)
Classification	The record classifies its subject as displayed; preserve the literal value.	Does an individual record concern a person rather than the target firm? API classifications distinguish those subjects. (open.gsa.gov)
Excluding agency and authority	The record attributes the action to the named agency or authority.	What does that authority cover, and who can resolve ambiguity? FSD directs inquiries to the reporting agency. (www.fsd.gov)
Exclusion type, program, effect, Additional Comments	The record states a particular action and effect; copy the applicable wording.	Are there limits, exceptions, or incorporated terms? SAM directs readers to agency notes for Prohibition/Restriction scope. (sam.gov)
Active Date and Creation Date	The exclusion activation date and database creation date are distinct fields.	Is the analyst mistakenly using database creation as the action's start? GSA defines them separately. (open.gsa.gov)
Termination Date or an indefinite entry	The record states an end date or no set end date, as applicable to that record.	Has an agency changed the action, and what evidence confirms current status? GSA's FASCSA layout defines indefinite as no set termination date. (open.gsa.gov)
Agency contact and record identifier	There is a route for clarification and a key for the exclusion record.	Is the contact available and is the key an exclusion identifier rather than an entity identifier? GSA distinguishes its internal SAM Number. (open.gsa.gov)

The table separates transcription from interpretation. A reviewer can accept that a record displays a particular effect while leaving its application to the acquisition structure unresolved. The nonprocurement record requirements similarly distinguish action type, cause, scope, termination, contact, and available entity identifier. (www.ecfr.gov) Preserve the exact record text before adding an analyst's explanation.

Pay particular attention to legacy terminology. SAM says **Exclusion Types** replaced **Cause and Treatment (CT) Codes**; newly created records use an exclusion type rather than a CT code. (sam.gov) Retain a legacy code if it appears in historical evidence, but do not silently translate it into a current effect without the relevant

official explanation.

An identifier's absence is a data limitation, not a mismatch by itself. Conversely, an identifier that conflicts with the target packet deserves explicit investigation of the identity evidence before a hit is accepted. Under this report's protocol, similar names remain possible matches until corroborated. FAR 9.404 directs inquiries about listed entities to the action-taking agency. (www.ecfr.gov) Keep the disagreement visible in the worksheet rather than averaging it into a confidence score.

Decision Ladder and Counsel Escalation

A useful disposition states the evidence condition and the next research action. It should not claim to determine federal award eligibility. FAR 9.405 describes contracting consequences, exceptions, and reviews at procurement stages, including another check immediately before award. (www.acquisition.gov) An origination snapshot serves a different decision point and should be labelled accordingly.

Table 2 proposes a decision ladder for acquisition-target research. These are editorial workflow categories, not government status labels.

Research state	Finding to retain	Next action
No matching public hit after defined search	No matching public active record found for the documented names, identifiers, access, and time.	Continue research under the mandate, with a refresh trigger. Do not claim historical clearance; inactive access is restricted. (www.fsd.gov)
Possible name-only hit	A similar name appears; target identity is unresolved.	Compare the entity packet, then route unresolved matching questions to the issuing agency through the review owner; EPA identifies that agency as responsible for its SAM information. (www.epa.gov)
Matched active record	Retained identity evidence supports that the active record concerns the screened entity.	Pause conclusions that assume unrestricted contracting and obtain procurement-counsel interpretation of effect, exceptions, and transaction relevance. (www.ecfr.gov)
Matched historical evidence	A dated document concerns the entity, but its relationship to current status needs verification.	Preserve provenance and obtain current agency or appropriately accessible record evidence; do not infer public inactive access. (www.fsd.gov)
Unresolved scope	Identity may be established, but the entity, activity, or period covered remains unclear.	Escalate the exact ambiguity and the effect text, including Additional Comments. (sam.gov)

“Possible” should remain open until the identity evidence is resolved. “Matched” should describe the strength of the identity conclusion, while **active**, **historical**, and **scope unresolved** describe separate properties.

Counsel's handoff should ask concrete questions:

- **Authority:** Which procurement or nonprocurement rules govern the relevant transaction and agency?
- **Operative text:** Does an agency class deviation change the provisions being relied on?
- **Identity boundary:** Does the action reach the target legal entity, an organizational element, or specifically named affiliates?

- **Contract position:** Does the issue concern a new award, an existing contract, an option, an order, or subcontracting?
- **Scope language:** What do the effect text, comments, underlying decision, and any agreement actually restrict?
- **Dates:** Is there verified evidence of modification, termination, or an indefinite period?
- **Evidence gap:** What agency clarification or additional document is necessary before research proceeds on the assumption at issue?

Those questions reflect material distinctions in the sources. FAR 9.405-1 permits some existing contracts to continue, while restricting additional work, options, extensions, and specified orders absent the stated determination. It calls for agency contracting, technical, and counsel review of termination decisions. (www.acquisition.gov) FAR 9.405-2 separately addresses subcontracting, including a baseline threshold exceeding **$45,000** and an exception for commercially available off-the-shelf items. (www.acquisition.gov) That figure should not be applied without checking the relevant rule and contract context. SAM's exclusion-type help still displays a **$30,000** subcontract figure. (sam.gov) The discrepancy reinforces the need to verify the operative rule rather than copy a help-page threshold.

Affiliate scope especially requires care. FAR 9.403 defines affiliation through control or power to control, including common third-party control. (www.acquisition.gov) FAR 9.406-1 addresses organizational scope and requires specific naming, notice, and an opportunity to respond when a debarment is extended to affiliates. (www.acquisition.gov) A corporate relationship merits review; it is not an analyst's basis for declaring every related entity excluded.

Printable Match Worksheet

The worksheet below is intended to travel with the target-research record. Complete it for the specified screened entity, retain supporting files, and leave unavailable fields explicitly unanswered. Its exclusion-field design follows the official distinction between identity, agency, scope, dates, and contact information. (www.ecfr.gov) The additional ownership, review, and handoff fields are proposed research controls.

Table 3 provides a printable blank worksheet. Enter exact source values before adding interpretations; use “not displayed,” “not obtained,” or “unresolved” where appropriate.

Worksheet field	Entry to complete
Screening entity	Legal name: _____; jurisdiction and registry ID: _____; corporate boundary: _____
Names searched	Exact legal name: _____; DBA: _____; former names: _____; evidence linking names: _____
Identifiers searched	UEI: _____; CAGE/NCAGE: _____; source and observed date for each: _____
Search log	Queries and filters: _____; access level: _____; result count for each: _____
Retained search evidence	Search timestamp and time zone: _____; PDF or capture reference: _____
SAM exclusion identity	Record URL: _____; displayed SAM Number or other record key: _____; entity identifiers: _____

Worksheet field	Entry to complete
Record subject	Displayed name and address: _____; classification: _____; cross-references: _____
Action and authority	Excluding agency: _____; authority/cause as displayed: _____; type and program: _____
Dates as displayed	Active: _____; termination or indefinite: _____; created: _____; modified/updated: _____
Effect and limits	Exact effect text: _____; Additional Comments: _____; referenced document: _____
Retrieval and provenance	Record retrieved at: _____; source URL: _____; retained file reference: _____
Match evidence and confidence	Agreements: _____; conflicts: _____; missing information: _____; narrative confidence: _____
Disposition and escalation	Research state: _____; open question: _____; escalation owner: _____; next review trigger: _____

The worksheet intentionally records both search evidence and record evidence. FSD's no-result documentation specifies criteria, date, and result count, whereas its printing instructions describe retaining individual exclusion records. (www.fsd.gov) A reviewer should be able to see which of those artifacts supports the finding without repeating the entire research process.

Use the worksheet consistently:

- **Preserve blanks honestly:** An unavailable identifier or date is a limitation, not a value to reconstruct from a similar record.
- **Keep exact text:** Put the source's effect wording beside the analyst's interpretation, with clear attribution.
- **Describe confidence:** Explain why the match is supported or uncertain; avoid an invented numerical probability.
- **Assign the next action:** Name the review role responsible for a gap, the question it owns, and the event that requires a refresh.

Do not fill an ownership gap by assuming the business registry is comprehensive. California explicitly says its Secretary of State does not collect business-entity ownership information. (www.sos.ca.gov) Where a filing identifier is used for additional corroboration, retain its purpose: the Securities and Exchange Commission (SEC) says some legal entities can have more than one **Central Index Key (CIK)**. (www.sec.gov) Neither source should be stretched into a complete corporate-family map.

Data Analysis and Evidence

The defensible quantitative core consists of identifier constraints, administrative timing, and retrieval limits. It does not support an estimate of how frequently acquisition candidates are excluded. The following values come from official sources; they measure different things and should not be combined into a score.

- **12 characters:** GSA describes the UEI as alphanumeric. Its transition guidance distinguishes issuing that identifier from full registration and says an issued UEI does not expire. A valid identifier is therefore useful identity evidence, rather than proof of a current registration or an unrestricted contracting position. (www.gsa.gov)
- **3 working days:** Baseline FAR 9.404 requires exclusion entry within this period after the action becomes effective. A search timestamp and action date can differ for reasons contemplated by the rule itself. (www.acquisition.gov)
- **5 working days:** The same baseline provision generally requires updates within this period after modification or rescission. That language does not establish a guaranteed maximum age for everything visible in a particular search. (www.acquisition.gov)
- **3 business days:** The current nonprocurement provision requires information entry after specified exclusion or status events within this period. Its trigger and wording should be retained independently of the procurement rule. (www.ecfr.gov)
- **10 records per page and 10,000 records:** GSA's interactive Exclusions API documentation describes this page size and a first-10,000-record return limit. A batch-research implementation must account for pagination and its query coverage; a successful response is not evidence that every intended record was examined. (open.gsa.gov)
- **Distinct date dimensions:** FSD documents Active, Termination, Created, and Modified date filters. GSA separately defines activation and database creation. Retrieval time is an additional analyst-recorded timestamp. (www.fsd.gov) (open.gsa.gov)

Regulatory versioning is another measurable control. The baseline FAR pages displayed **Federal Acquisition Circular (FAC) 2026-01, effective March 13, 2026** when researched. (www.acquisition.gov) RFO's Part 9 model uses “business days” where the baseline entry rule uses “working days”; applicability depends on agency deviation adoption. (www.acquisition.gov) The Department of Energy's **May 20, 2026** policy flash documents its related Part 909 class deviation. (www.energy.gov) The Defense Contract Management Agency (DCMA) **June 16, 2026** memorandum documents its implementation instructions. (www.dcma.mil) These are evidence that agency context matters, not a claim that all agencies follow identical text.

Source freshness should be explicit as well. The opened individual electronic Code of Federal Regulations (eCFR) timing section displayed currency through **October 26, 2026**. (www.ecfr.gov) The opened subpart view displayed **October 23, 2026**. (www.ecfr.gov) Record the source's stated currency alongside the retrieval date. Neither the regulatory posting cadence nor the API's documented limits supplies a validated false-match rate, target prevalence benchmark, or probability of future eligibility.

Case Studies and Real-World Examples

Same name, different entity (Hypothetical Example)

The following scenario is fictional. A target list uses a short trading name. A public exclusion result shows a similar legal name, but the address differs and no common entity identifier has been established. The researcher has a New York entity record and an assumed-name filing linking the acquisition candidate to its

trading name. Those documents support the candidate's identity; they do not yet connect it to the exclusion result. New York's published search information includes entity name, jurisdiction, status, and service-of-process details. (dos.ny.gov) Its assumed-name guidance explains the DBA relationship. (dos.ny.gov)

The recommended disposition is **possible name-only hit**. Retain the registry documents, the search capture, the record URL, and the unresolved discrepancies. Route the identity inquiry to the action-taking agency through the assigned review owner, consistent with the FAR direction for inquiries about listed entities. (www.ecfr.gov) A documented identifier or other agency-confirmed distinction could resolve the question; similarity alone should not be converted into a finding against the target. No actual company's status is asserted here.

Related company, uncertain reach (Hypothetical Example)

This second scenario is also fictional. A candidate has an operating subsidiary and a related holding entity. An exclusion record has been matched to the holding entity, while the subsidiary has a different UEI and contracts under its own legal name. The researcher finds related-recipient grouping in USAspending. Its guide explains that larger entities can contain recipients with different identifiers and can be grouped using parent data. (www.usaspending.gov)

The research file should preserve both entities rather than merge their identifiers or transfer the exclusion label automatically. The recommended disposition for the subsidiary is **unresolved scope**, with the matched related-entity record attached. FAR affiliation is a control question, and FAR debarment scope includes specific requirements for affiliates. (www.acquisition.gov) Counsel receives the corporate relationship evidence, exact record text, dates, and the question of whether the relevant action reaches the subsidiary. The scenario demonstrates a handoff method, not a legal outcome or an actual acquisition result.

Implications and Future Directions

Exclusion screening should remain one explicit component of acquisition research. Other system fields can look similar while representing different questions. Grants.gov, for instance, distinguishes **Active Exclusions** from **Debt Subject to Offset** and directs grantors to their internal procedures for handling responses. (www.grants.gov) The annual Code of Federal Regulations also explains that a nonprocurement transaction need not involve transferring federal funds. (www.govinfo.gov) Analysts should preserve the source's vocabulary and transaction context instead of compressing multiple signals into “government approved.”

Keep adjacent checks separate. OFAC's search score measures name similarity, and OFAC does not recommend a universal threshold for every search. (ofac.treasury.gov) OIG says the LEIE concerns its own exclusion actions and federal health care programs; that does not make it interchangeable with SAM or relevant to every government-services candidate. (oig.hhs.gov) A state license check addresses another defined status, and California warns that contractor license status can change at any time. (cslb.ca.gov)

For an ongoing research operation, the proposed controls are straightforward:

- **Retain snapshots:** Preserve the evidence used for each accepted finding and its retrieval context.
- **Refresh at decision points:** Recheck when the screening entity changes or a later review will rely on the finding.

- **Track source changes:** Record updated help instructions, field definitions, and access restrictions.
- **Separate automation:** Automate query logging and comparison support while leaving scope conclusions with the responsible reviewer.
- **Preserve unresolved work:** Carry identity conflicts and counsel questions forward with an owner.

The agency remains important after a technically successful search. EPA states that the agency issuing the action is responsible for the information placed in SAM. (www.epa.gov) FSD likewise directs additional-information requests to the reporting federal agency. (www.fsd.gov) Future workflow improvements should therefore strengthen evidence retention and escalation routing, rather than promise that a search engine or matching algorithm can settle the legal effect of a record.

Conclusion

SAM.gov exclusions screening is complete for an origination review only when the research finding states its entity, evidence, access limits, and time. An apparent name hit starts an identity question. A supported entity match opens a separate inquiry into the action, its period, and its scope. FAR 9.404 directs inquiries about listed entities to the action-taking agency, giving the analyst a path when public fields do not resolve identity. (www.ecfr.gov)

The recommended output is a bounded disposition and a retained worksheet. Record names and identifiers searched, preserve contradictory evidence, distinguish an entity identifier from an exclusion-record key, and transcribe dates according to their stated meaning. Public active-only access limits what a negative result can establish; it should not be described as a complete historical clearance. (open.gsa.gov) (www.fsd.gov)

For a matched active record or unresolved affiliate question, pause the research conclusion that depends on unrestricted contracting and hand counsel the specific factual uncertainty. FAR provisions distinguish new contracting, continuation of existing contracts, and organizational scope, so the record should preserve those distinctions for review. (www.ecfr.gov) This approach gives the deal team a result it can examine and update: what was searched, what matched, what the official record says, and what still needs a competent decision before the research proceeds.

Source links

Links cited in this article, in order of first appearance. Full addresses are provided for readers using extracted text.

1. https://www.ecfr.gov/current/title-48/chapter-I/subchapter-B/part-9/subpart-9.4/section-9.404
2. https://www.fsd.gov/gsafsd_sp/en/exclusions-how-do-i-search-for-active-exclusions?id=kb_article_view&sysparm_article=KB0036199
3. https://www.fsd.gov/sys_attachment.do?sys_id=21baf0e31bf0f5d02fe5ed7ae54bcb4f
4. https://open.gsa.gov/api/exclusions-api
5. https://open.gsa.gov/api/sam-entity-extracts-api/v1/SAM_Exclusions_Public_Extract_Layout_V2.pdf
6. https://www.acquisition.gov/far/9.404
7. https://www.acquisition.gov/far-overhaul/faqs
8. https://www.ecfr.gov/current/title-48/chapter-I/subchapter-B/part-9/subpart-9.4/section-9.405-1

9. https://www.gsa.gov/cdnstatic/To_Publish_-_FAQs_from_Unique_Entity_ID_Forum.pdf
10. https://www.usaspending.gov/federal-spending-guide
11. https://www.acq.osd.mil/dpap/dars/pgi/pgi_htm/PGI204_11.htm
12. https://www.ecfr.gov/current/title-48/chapter-I/subchapter-B/part-9/subpart-9.4/section-9.405
13. https://oig.hhs.gov/faqs/exclusions-faq
14. https://cslb.ca.gov/onlineservices/checklicenseii/CheckLicense.aspx
15. https://dos.ny.gov/node/35446
16. https://www.sos.ca.gov/business-programs/business-entities/information-requests
17. https://www.dla.mil/Working-With-DLA/Applications/Details/Article/2920893/cage-code-commercial-and-government-entity-code
18. https://ofac.treasury.gov/faqs/5
19. https://sam.gov/entity-information/resources/exclusion-types
20. https://www.ecfr.gov/current/title-2/subtitle-A/chapter-I/part-180/section-180.145
21. https://www.fema.gov/sites/default/files/documents/fema_contract-provisions-guide_6-14-2021.pdf
22. https://www.doi.gov/pam/suspension-debarment/search-exclusions
23. https://sam.gov/content/exclusions
24. https://www.fsd.gov/gsafsd_sp/en/exclusions-how-do-i-print-an-exclusion-record?id=kb_article_view&sysparm_article=KB0017337
25. https://www.fsd.gov/gsafsd_sp/en/exclusions-how-do-i-print-or-download-verification-that-an-entity-has-no?id=kb_article_view&sysparm_article=KB0049672
26. https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-9
27. https://www.fsd.gov/gsafsd_sp/en/exclusions-where-can-i-obtain-additional-information-on-an-excluded?id=kb_article_view&sysparm_article=KB0016294
28. https://open.gsa.gov/api/sam-entity-extracts-api/v1/SAM_Exclusions_Public_FASCSA_Orders_Extract_Layout_V2.pdf
29. https://www.ecfr.gov/current/title-2/subtitle-A/chapter-I/part-180/subpart-E
30. https://www.acquisition.gov/far/9.405
31. https://www.epa.gov/grants/interagency-suspension-and-debarment-committee
32. https://www.acquisition.gov/far/9.405-1
33. https://www.acquisition.gov/far/9.405-2
34. https://www.acquisition.gov/far/9.403
35. https://www.acquisition.gov/far/9.406-1
36. https://www.sos.ca.gov/administration/public-records-act-requests/business-entity-records
37. https://www.sec.gov/submit-filings/filer-support-resources/edgar-glossary
38. https://www.ecfr.gov/current/title-2/subtitle-A/chapter-I/part-180/section-180.520
39. https://www.energy.gov/management/pf-2026-47-class-deviation-dear-part-909-contractor-qualifications-implement-changes-far
40. https://www.dcma.mil/Portals/31/Documents/Policy/DCMA_PTM_26-001.pdf
41. https://dos.ny.gov/node/35461

42. https://www.grants.gov/help/grantors/sam-active-exclusions-and-debt-subject-to-offset
43. https://www.govinfo.gov/content/pkg/CFR-2026-title2-vol01/xhtml/CFR-2026-title2-vol01-part180.html
44. https://ofac.treasury.gov/faqs/247
45. https://cslb.ca.gov/onlineservices/dataportal/ListByClassification

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About Docket

Docket provides deal-origination research software and managed research for private equity firms. We help investment teams investigate acquisition targets using structured screening criteria, retained sources and reviewable company evidence. Teams can work through a self-serve platform or use managed research, depending on how they want research delivered.

Research against a defined mandate

A useful target list needs more than company names. Docket focuses on the questions that determine whether a company fits an investment mandate, including the evidence needed to support or qualify each answer. Our research approach makes the connection between screening criteria, source material and conclusions visible to the team reviewing the work.

Triage, Scout and Audit

Docket's three named research agents perform complementary tasks. Triage resolves company identity and screens fit. Scout collects sourced answers against the mandate. Audit checks retained evidence, addresses contradictions and leaves unsupported answers visibly unresolved. This structure helps reviewers distinguish established findings from missing information and questions requiring further investigation.

Evidence that supports investment-team judgment

Our research library covers market mapping, screening criteria, private-company data, succession and ownership, source evaluation and evidence standards. These resources explain the methods and limitations behind origination research. Findings support a team's judgment; they do not establish that a company is for sale or guarantee a transaction or investment outcome.

Work with Docket

Visit Docket to explore the platform, managed research and the current contact path. Read about screening criteria, evidence standards, AI research agents and market mapping.

Public examples are illustrative unless explicitly identified otherwise. Research preparation and authorized outreach are separate activities; confidential target lists and customer outcomes should never be inferred from an educational example.

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