



**Focus Group Meeting with U.S. Debarment Officials  
on the Review of the World Bank Group Sanctions System  
*Consultation Feedback Summary***

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**Date:** October 21, 2013, 10.00 a.m. – 11.00 a.m. (-0400 UTC)

**Venue:** World Bank, Washington, D.C.

**Total Number of Participants:** 3

**FEEDBACK FROM PARTICIPANTS**

**General Comments**

- The U.S. system is based on the notion of “present responsibility” while the Bank’s sanctions system appears to be more oriented towards punitive measures/negative incentives. A question was posed as to whether the Bank is satisfied that a sanctions regime produces better results than a regime based on protecting business interests from contractors engaging in misconduct/poor performance and whether the Bank should extend the bases for its actions to include poor performance
- Participants expressed an interest in having access to more information regarding the misconduct that leads to the debarment of a company/individual as well as in fully reasoned SDO determinations being made public

**Beyond Procurement and ‘Baseline Sanction’**

- Call for a more pro-active approach in the investigation of cases outside the procurement process

**Early Temporary Suspension**

- Participants referred to “suspension” under the U.S. Federal Acquisition Regulations (FAR) as an important tool to protect the Government’s interest; suspension is the action taken by a suspending official to disqualify a contractor temporarily from Government contracting and Government-approved subcontracting and is imposed “on the basis of adequate evidence, pending the completion of investigation or legal proceedings, when it has been determined that immediate action is necessary to protect the Government’s interest.” (see U.S. FAR, Section 9.407-1).