



Vendor Supply-Chain Vetting Checklist

How the government screens its suppliers — a 15-minute pre-purchase check for small DoD contractors.

The government is deliberately careful and selective about the companies it does business with, and it expects that diligence to flow down to its contractors. Run this before you buy any tool or hardware. **"We didn't know" is not a defense in a False Claims Act case.**

- ☐ **1 Identify the real owner**
HQ country and the country of the *ultimate* parent — not the US sales entity. A US-registered LLC can be wholly owned abroad.
- ☐ **2 Screen against the government's lists (all of them)**
Check the entity and its parent against SAM.gov Exclusions, SAM.gov FASCSA Orders, the DoD 1260H list, OFAC, and the BIS Entity List. A hit on any is stop-and-escalate — let the lists do the judging.
- ☐ **3 Clear Section 889**
No covered equipment from Huawei, ZTE, Hytera, Hikvision, or Dahua (or affiliates). Ask about the OEM, not the brand — white-labeled cameras are the #1 finding. Get it in writing for your FAR 52.204-24/26 reps.
- ☐ **4 Check country of manufacture (TAA)**
For anything on a GSA Schedule or TAA-covered buy: US or a designated (allied) country. Hardware from a non-designated country generally can't ride a Schedule.
- ☐ **5 Verify CUI hosting (if CUI is involved)**
FedRAMP Moderate authorized — or documented equivalency assessed by a 3PAO (no self-attestation) — on the FedRAMP Marketplace. US data residency; US-person admin access. No FedRAMP, no CUI.
- ☐ **6 Secure the flow-downs**
Get the vendor to accept DFARS 252.204-7012, and flow down FAR 52.204-25 (889) and 52.204-30 (FASCSA) to any sub or supplier.
- ☐ **7 Set a recurring re-check**
Re-screen FASCSA orders and exclusions at least every three months during performance, and re-check the lists on every material re-buy. Clearance is a snapshot, not a permanent status.

WHERE TO VERIFY — BOOKMARK THESE SIX

FedRAMP Marketplace — marketplace.fedramp.gov

SAM.gov — Exclusions + Supply Chain (FASCSA) Orders

DoD 1260H list — defense.gov

OFAC + BIS Entity List — treasury.gov / bis.gov

FCC Covered List — fcc.gov

TAA-designated countries — [GSA](https://gsa.gov) / FAR 25.003