

Suspension And Debarment: FY 2025 By The Numbers

By **David Robbins and Duc Nguyen** (November 26, 2025, 4:12 PM EST)

It is that time of year again. Now that the federal fiscal year is behind us, we once again analyze how active certain federal agencies were with their suspension and debarment authority.

This is our 10th year undertaking this analysis. What began as a subjective assessment of federal agencies whose suspension and debarment actions would be of interest to the broader government contracting community a decade ago, has turned into an annual study showing significant changes in the government's use of the suspension and debarment remedy.

And as ever, because federal agencies do not timely publish clear information about their suspension and debarment operations, this article series seeks to fill the information vacuum using publicly available data from the System for Award Management.[1]

Why do we take this information from SAM.gov and not just wait for the often-delayed Interagency Suspension and Debarment Committee, or ISDC, Section 873 report to Congress?[2] The reasons are timing and accuracy.

Regarding timing, although the reports to Congress are required annually, the reports are often delayed.[3] The most recently published report is dated from fiscal year 2023 and was issued on Dec. 31, 2024.

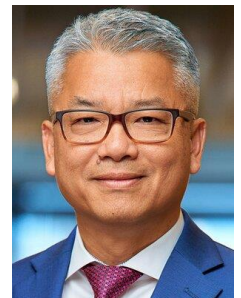
Concerning accuracy, the Section 873 reports use a different counting mechanism than SAM.gov data. SAM.gov data counts the number of respondents subject to exclusion.

That is, if the hypothetical entity ACME Contracting Co. was suspended, proposed for debarment, and debarred in a single fiscal year, that would show up as "one" respondent in the SAM.gov data. But the ISDC report counts those same actions as three actions.

There are solid reasons for the ISDC's counting convention. After all, the statutory requirement for the report asks for "a summary of each agency's activities and accomplishments in the Governmentwide debarment system." [4] The number of times an agency had to prepare paperwork to exclude a single entity is a valid measurement of agency activity.



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But members of the public are more likely to understand the numbers when they list the numbers of respondents excluded. Stated differently, for the public to use suspension and debarment data to assess risk and guide operations, SAM.gov data is more useful.

Fiscal Year 2025 at a Glance

AGENCY	TOTAL	FIRMS	INDIVIDUALS	SPECIAL ENTITIES	PERCENTAGE INDIVIDUALS
Agriculture	15	2	11	2	73%
Commerce	0	0	0	0	N/A
DOD Air Force	37	8	17	11	46%
DOD Army	20	3	15	2	75%
DOD DLA	78	37	31	10	40%
DOD Navy	26	6	20	0	77%
Education	0	0	0	0	N/A
EPA	31	5	10	16	32%
GSA	5	1	3	1	60%
Interior	11	2	7	2	64%
NASA	0	0	0	0	N/A
NSF	3	0	3	0	100%
SBA	12	11	1	0	8%
State	15	2	12	1	80%
VA	7	2	5	0	71%

Unlike in recent years, other than duplicate entries at the U.S. Department of Veterans Affairs which we removed from the count above, there was not a significant number of exclusions of common names for the same individual or company. Last year, for example, we discussed the presence of 26 common names that existed in the SAM.gov data and were removed from the table.

To oversimplify, common names would be akin to a hypothetical exclusion of Jon Smith also listed in SAM.gov as Jonathan Smith, Jonathan X. Smith and Jonathan X. Smith, M.D. In recent years, such a practice was common. It was significantly less common during fiscal year 2025.

Also, the U.S. Department of the Navy appears to have concluded its exclusions of the Glenn Marine corporate family and others implicated in the so-called Fat Leonard scandal. In past years, those entities accounted for as many as 50 actions. That is not the case this year.

Finally, we should remark on the end of our ability to list the U.S. Agency for International Development on

this chart, as the agency has ceased to exist.

As in years past, small, U.S.-based firms continue to be excluded far more frequently than large U.S.-based firms.

As it is every year, analyzing business size is more art than science. We rely on open-source business intelligence services to look up company revenue and employee numbers. These resources are helpful, but likely contain inaccuracies. Nevertheless, as is the case every year, the next table reflects the use of author judgment.

This analysis does not account for the applicable size standard for every business or contract, as that can be any combination of the number of employees and/or annual revenue. Instead, when publicly available sources indicate fewer than 100 employees or single-digit million-dollar revenues per year, this analysis generally counts the business as small.

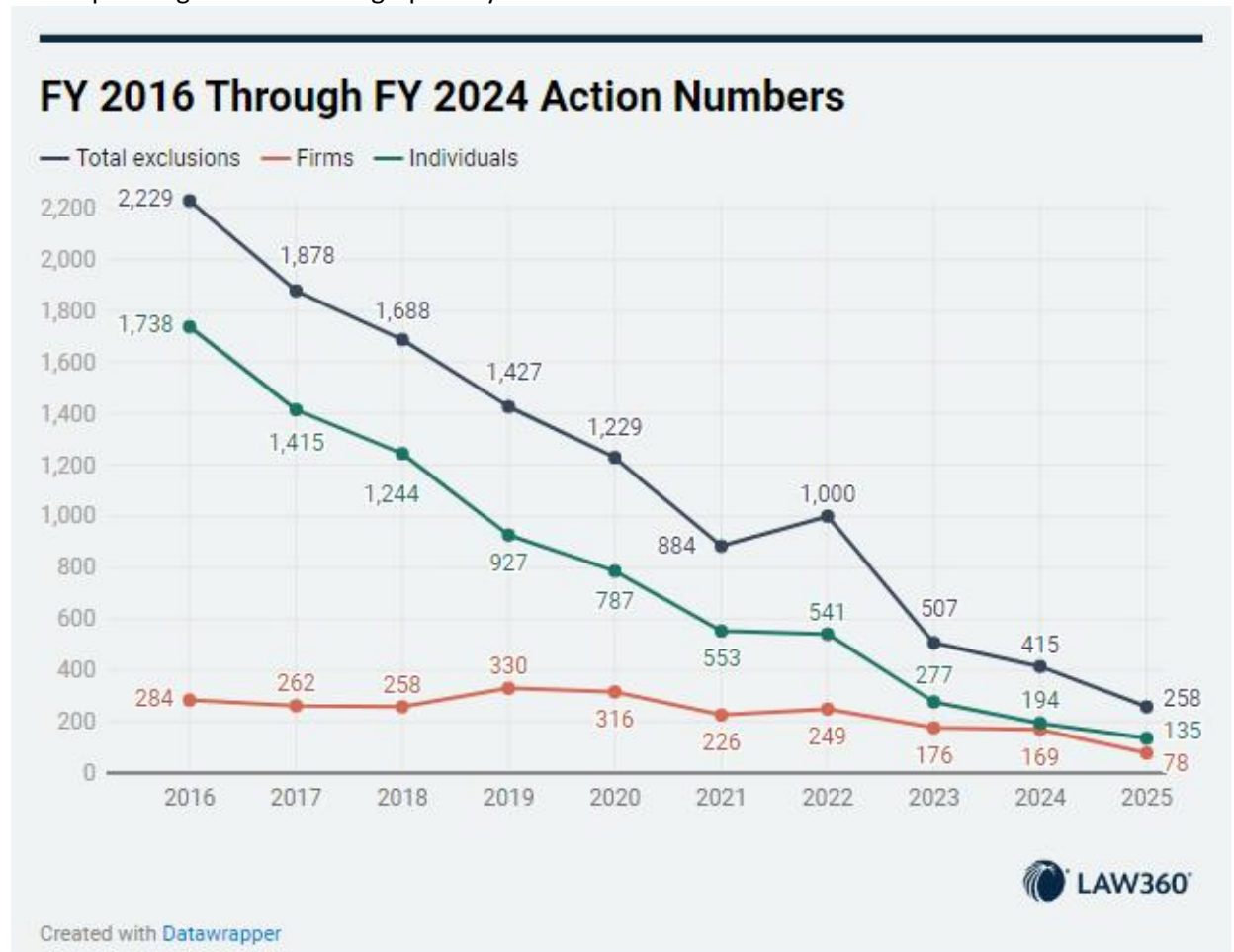
And finally, pandemic-affected year 2020 is not included because of the authors' concern that year that federal agencies' move to remote work and other pandemic-era distractions might have skewed the data.

AGENCY	2025	2024	2023	2022	2021	2019	2018	2017
Agriculture	100%	N/A	N/A	N/A	100%	100%	100%	100%
USAID	RIP	N/A	N/A	N/A	100%	N/A	N/A	N/A
Commerce	N/A	100%	N/A	N/A	100%	100%	100%	N/A
DOD-AF	88%	100%	100%	100%	88%	92%	100%	100%
DOD-Army	100%	100%	95%	100%	100%	91%	98%	62%
DOD-Navy	83%	100%	100%	100%	97%	100%	94%	94%
DOD-DLA	92%	100%	96%	100%	92%	97%	91%	73%
Education	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
EPA	80%	73%	90%	82%	97%	87%	98%	77%
GSA	100%	100%	100%	77%	100%	100%	97%	100%
Interior	100%	100%	100%	100%	100%	100%	50%	100%
NASA	100%	100%	100%	84%	N/A	0%	100%	67%
NSF	N/A	N/A	N/A	100%	100%	100%	100%	100%
State	N/A	N/A	N/A	100%	N/A	100%	100%	N/A
VA	100%	100%	82%	82%	100%	100%	100%	100%

Comparison of Fiscal Year 2016 Through Fiscal Year 2025

FISCAL YEAR	TOTAL EXCLUSIONS	FIRMS	INDIVIDUALS	SPECIAL ENTITIES
2016	2,229	284	1,738	307
2017	1,878	262	1,415	201
2018	1,688	258	1,244	197
2019	1,427	330	927	188
2020	1,229	316	787	128
2021	884	226	553	104
2022	1,000	249	541	210
2023	507	176	277	52
2024	415	169	194	52
2025	258	78	135	45

And expressing the same data graphically:



Analysis

The suspension and debarment actions levels within this subset of federal agencies is low. Shockingly low. The question is why? Many different contributing factors could be at play, including the strain placed on the federal workforce in 2020, the reduction in staffing levels, and perhaps the realization that government contractors on the whole operate in an ethical and compliant manner.

Rather than rehashing the reasoning for this continuing decline in action numbers in what might be an extraordinary year, we thought we might do things a little differently this year. So we will provide thoughts and insights into the future of suspension and debarment practice, colored by our prior experience as federal suspending and debarring officials.

Changing Nature of Suspension and Debarment Practice

The nature of suspension and debarment practice has undeniably shifted in recent years. The government engages frequently with industry before a suspension or debarment notice issues. Those interactions add value to the acquisition system as a whole because of the nature of these communications.

Industry will generally inform suspension and debarment offices of improvements made in their ethics and compliance programs and operations in order to avoid exclusion, with the threat of exclusion being one of many catalysts for the changes. And this supports the Federal Acquisition Regulation's policy that "[p]urchases shall be made from, and contracts shall be awarded to, responsible prospective contractors only." [5]

The challenge of such a deep drop in exclusions though is, at some point, policymakers may question whether the work can be collapsed into FAR 9.103(b) contracting officers' "affirmative determination[s] of responsibility." [6]

Stated differently, if responsibility reviews are happening increasingly before exclusions, and there is already a process for proactive determinations of responsibility in the FAR with that task assigned to contracting officers, why do the two functions exist?

Losing dedicated suspension and debarment offices and the function to contracting officers would be a mistake. In an era where government contractors are increasingly large and diversified, suspension and debarment offices that speak for the entirety of the executive branch when engaging with contractors have value.

The whole-of-government perspective is important when evaluating whether contractor ethics and compliance programs are sufficient to meet the government's expectations. Individual contracting officers focused on individual programs may not have a broad enough perspective to encourage meaningful change.

But the more suspension and debarment offices are able to conduct their reviews before ever suspending or debarring contractors, the less a justification exists for broad exclusions. The government must be able to answer why it is that increasing numbers of matters can be dealt with informally and without an exclusion, while others require an immediate exclusion of a company, its officers, and anyone related to the officers who might reasonably be considered a government contractor in the future.

Expanding the Agencies Analyzed

Previous commentaries on the federal suspension and debarment system raised important questions about the stark downward trend in governmentwide suspension and debarment system activity for which the raw

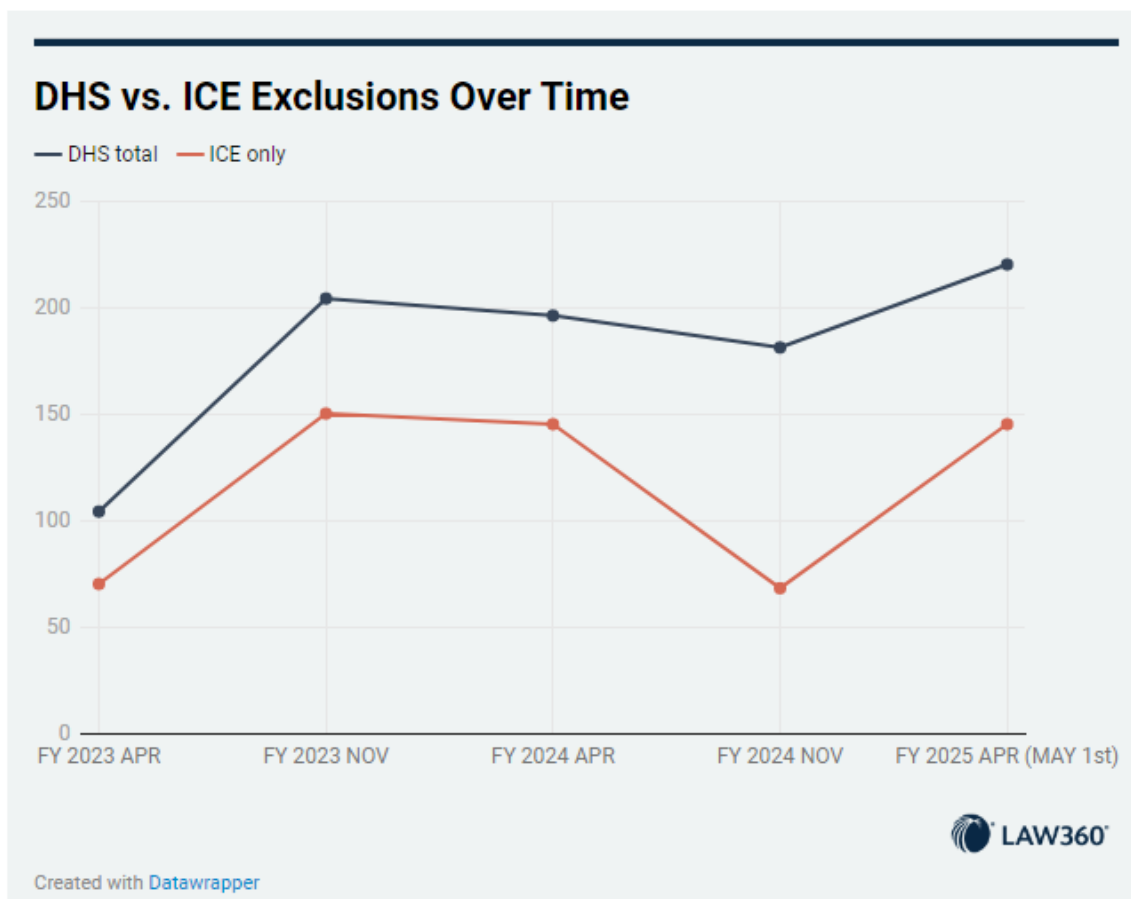
data provides no clear answers.

One such question is what circumstances may necessitate an immediate exclusion by the government given its recent recognition of agencies' discretion to issue prenotice letters[7] and reported extensive use by debarring officials of this mechanism to gather information on an entity's responsibility prior to imposing an exclusion.[8] Arbitrary use of this effective tool by agencies to gather information on corporate or individual responsibility prior to imposing an immediate exclusion would undoubtedly raise questions about inconsistent treatment of similarly situated contractors.

Another question comes to mind: Why are we not seeing a corresponding drop in activity levels across all federal agencies? The exclusion data for the U.S. Department of Homeland Security, including its most active component — Immigration and Customs Enforcement, is especially noisy and has historically been omitted from this analysis.

As noted, historical analysis has focused on more active agencies issuing contracts, and, presumably, grants. So the omission is consistent and understandable. Yet incorporating the data is important to show the governmentwide activity level. As such, an analysis of DHS' data using the more inclusive semi-annual exclusion datasets since fiscal year 2023 reveals a relatively steady level of suspension and debarment system activity by ICE and a slight increase in total exclusion actions taken by DHS since fiscal year 2023.[9]

In addition to the arrival of new leadership at DHS — a new debarring official and the current chair of the Interagency Suspension and Debarment Committee[10] during the relevant time frame, resource allocation and enforcement priorities likely factor into DHS' ability to counter the steady downward trend in governmentwide suspension and debarment system activity level.



Debarment has historically been used as a tool of public policy and the current time is no exception. A more robust use of the debarment remedy to effectuate the current administration's enforcement policies is already evident.

One example data point is the Small Business Administration's Oct. 21 suspension of ATI Government Solutions for engaging in alleged fraudulent pass-through schemes. Announcing the suspension on X, the SBA administrator reiterated that the agency has slashed Section 8(a) contracting goals, finding that "like every other government program rooted in DEI, the 8(a) program is rife with grift and fraud."^[11]

As a final note, while the model deviation language released as part of the "Revolutionary FAR Overhaul" for FAR Subpart 9.4 did not see major changes, the streamlining of FAR Subpart 9.1 (Responsible Prospective Contractors) may have practical impacts even if a clear change in policy is not discernible.

The model deviation language for FAR 9.103 (Policy) mandates that "[w]ithout a clear indication of responsibility" contracting officers shall "make a determination of nonresponsibility."^[12] Similarly, the deviation language for FAR 9.104 (Standards) clearly places the onus of demonstrating responsibility on the contractor.

The practical implication of the deviation language is that, absent an affirmative demonstration of responsibility by a contractor in every proposal, the contracting officer is required to find a contractor nonresponsible. In addition to the elevated risk of being subject to de facto debarment, contractors may wish to plan and game out scenarios should federal agencies use contractor responsibility as an instrument of public policy and to root out fraud, waste and abuse.

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[1] <https://www.sam.gov>.

[2] See <https://www.acquisition.gov/isdc-reporting>.

[3] Duncan Hunter National Defense Authorization Act for Fiscal Year 2009, Pub.L. No. 110-417, § 873.

[4] Id. at (a)(7)(C).

[5] FAR 9.103(a).

[6] FAR 9.103(b).

[7] FAR 9.406-3(h).

[8] See Section 873 ISDC Reports to Congress for FY 2021 through FY 2023.

[9] Although SAM.gov's exclusions datasets are a snapshot in time containing only active exclusions as of that date, SAM.gov's semi-annual exclusion roll-ups contain both active and inactive exclusions for each 6-month increment.

[10] Ms. Jennifer Ward at <https://www.dhs.gov/dhs-suspension-and-debarment-program>.

[11] Kelly Loeffler, SBA has launched an investigation into ATI Government Solutions and Susanville Indian Rancheria. This is why we have been conducting a full review of the 8(a) Program..., X (formerly Twitter) (October 21, 2025, 5:18 am) (Copy on file with author).

[12] Federal Acquisition Regulatory Council, Model Deviation Text – FAR Subpart 9.1: Responsible Prospective Contractors (RFO), https://www.acquisition.gov/far-overhaul/far-part-deviation-guide/far-overhaul-part-9#FAR_Subpart_9_1 (last visited Oct. 31, 2025).