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August 3, 2022

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SAPC INFORMATION NOTICE 22-15

TO: Los Angeles County Substance Use Disorder

Contracted Providers

FROM: Gary Tsai, M.D., Division Director

Substance Abuse Prevention and Control

SUBJECT: COMPLIANCE WITH ECONOMIC SANCTIONS IMPOSED IN

RESPONSE TO RUSSIA'S ACTIONS IN UKRAINE

On March 4, 2022, Governor Gavin Newsom issued <u>Executive Order N-6-22 (EO)</u> regarding sanctions against Russia and Russian entities and individuals. The Executive Order (EO) directs all agencies and departments (Agencies) that are subject to the Governor's authority to take certain steps described below.

The Department of Public Health's Division of Substance Abuse Prevention and Control (DPH-SAPC) is issuing this Information Notice to provide information on the EO and additional guidance on the responsibilities and steps that all provider agencies must take to ensure compliance with the EO, including submission of an attestation of compliance.

Per Governor Newsom's Executive Order N-6-22, all contractors, subcontractors and grantees that have agreements valued at \$5 million or more with agencies/ departments subject to the California Governor's authority are directed to report to their contracting or grantor agency or department regarding their compliance with economic sanctions imposed by the United States government in response to Russia's actions in Ukraine, as well as sanctions imposed under state law, if any.

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To ensure DPH-SAPC's compliance, in June of 2022 DPH-SAPC reviewed our active list of contracts and compared against the Office of Foreign Assets Control (OFAC) Sectoral Sanctions Identifications (SSI) List (SSI List Link) and validated none of our providers are on the SSI list. Additionally, we will continue to check this list prior to entering into any future contract or agreement.

PROVIDER COMPLIANCE WITH EXECUTIVE ORDER

Therefore, DPH-SAPC requires each provider agency who has a contract with DPH-SAPC in excess of \$5 million to:

- Attest to compliance with the EO, using the attached Attestation of Compliance with Economic Sanctions Imposed Against Russia Form
- Report all steps taken in response to the EO to ensure on-going compliance with the economic sanctions.

Providers who do not submit the required documentation will be considered in breach of their contract and/or agreement terms and provisions and may be subject to contract actions. In addition to attesting compliance, agencies must include narrative on steps taken in response to the EO and steps to ensure on-going compliance with the EO.

Your agency must complete the attached (1) *Attestation of Compliance with Economic Sanctions Imposed Against Russia* Form and (2) provide a statement on agency letterhead describing the steps and any actions taken in response to the EO and to ensure continued compliance with the EO.

Please submit both to your Contract Program Auditor as soon as possible, but no later than close of business on **Wednesday**, **August 17**, **2022**.

Please contact your assigned Contract Program Auditor for additional information.

We thank you for your prompt cooperation with this EO.

GT:mm

Attachment