

OSD

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SUSPENSION AND DEBARMENT

10-Year Update on Case Data & Metrics

2007–2017

ADDENDUM TO THE SECOND EDITION

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# CASE DATA

When the Office of Suspension and Debarment (OSD) was created, its terms of reference expressly called for the creation of a data management system. OSD has gathered statistics since receiving its first case.

OSD tracks a variety of indicators that provide insight into the workings of the sanctions system beyond the basic input and output measures of caseload, suspensions and debarments.<sup>1</sup> The World Bank's investigative and sanctions processes are well suited for tracking and measuring, given the specific milestones required. In many circumstances there are prescribed time limits for how long each step can take – for example, subject to any extension or stay of proceedings, Respondents have 90 days to appeal to the Sanctions Board by submitting a Response.

Tracking all steps from beginning to end allows OSD and others involved in the investigative and sanctions processes to monitor trends. This information in turn provides the World Bank with opportunities to direct its resources efficiently and effectively.

The following series of charts provides a glimpse into the OSD case review process from a number of angles, and also provides information about the performance of the World Bank's suspension and debarment system in general. Unless otherwise noted, all charts cover the period from OSD's inception through June 30, 2017 (the end of the Bank's Fiscal Year 2017). The case tracking data shown here reveals no detail about individual cases beyond generic identifiers such as case numbers and milestone dates.

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1. INT's annual reports, which are available at [www.worldbank.org/integrity](http://www.worldbank.org/integrity), reflect INT's tabulation of data relating to its investigative work.



# OSD DASHBOARD

This “all in one” dashboard with overall OSD caseload management statistics is used by the World Bank Suspension and Debarment Of 4 c81f v61tatis02 2 cm (eh overasenihement rs who ne-10( snapshotssueaed vityne cmioned pus sysrar, -0.034 Tw4.84su0.88

FY07-11

FY12

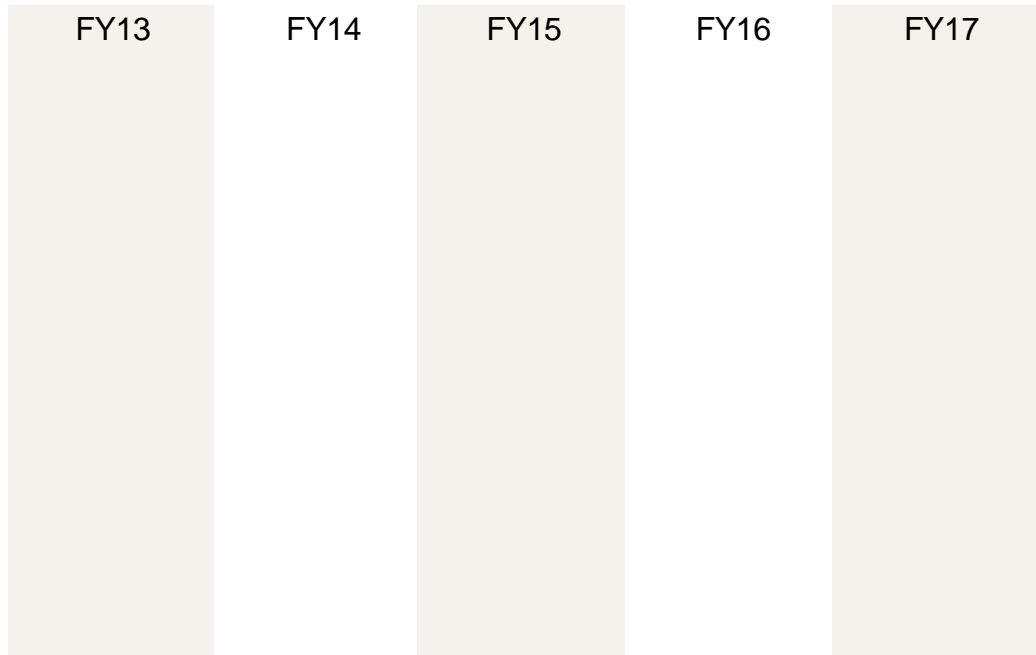
FY13

FY14

FY15

FY16

FY17



## 320 Sanctions Cases Submitted by INT

291	have been "regular" sanctions cases
29	have been early temporary suspension cases
26	have been withdrawn by INT/closed by OSD prior to issuance
2	have been settled prior to OSD initial review
11	are with OSD for initial review
6	are with INT for revisions
0	are with OSD for supplemental review
275	have been issued to respondents

## 275 Cases Issued by OSD

1	involve T ongoing early temporary suspensions
5	are with the respondents
11	are on appeal before the Sanctions Board
21	have been early temporary suspension cases superseded by an SAE
237	have been totally completed

## Percentage of Issued Cases Resolved at OSD Level

66%	have been resolved at OSD level
34%	have been appealed to the Sanctions Board

## 427 Firms/Individuals Temporarily Suspended

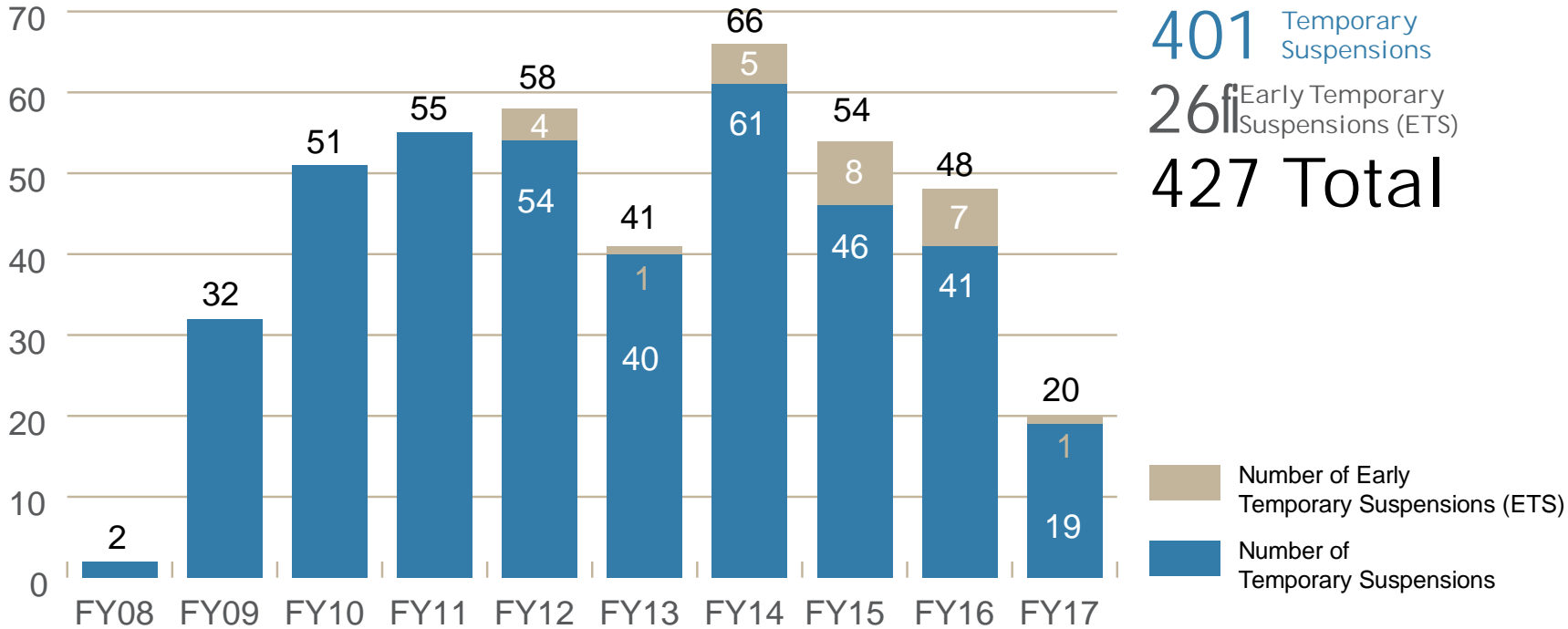
368	have been sanctioned by OSD/the Sanctions Board
8	have been sanctioned pursuant to a settlement agreement with INT after the temporary suspension
18	have not been found liable by the Sanctions Board
27	remain under temporary suspension
5	have been released following withdrawal of Notice
1	has been released following revision of recommended sanction

## 489 Firms/Individuals Debarred or Otherwise Sanctioned

381	have been sanctioned pursuant to OSD/Sanctions Board decisions
108	have been sanctioned pursuant to settlement agreements

# NUMBER OF FIRMS/INDIVIDUALS TEMPORARILY SUSPENDED BY OSD

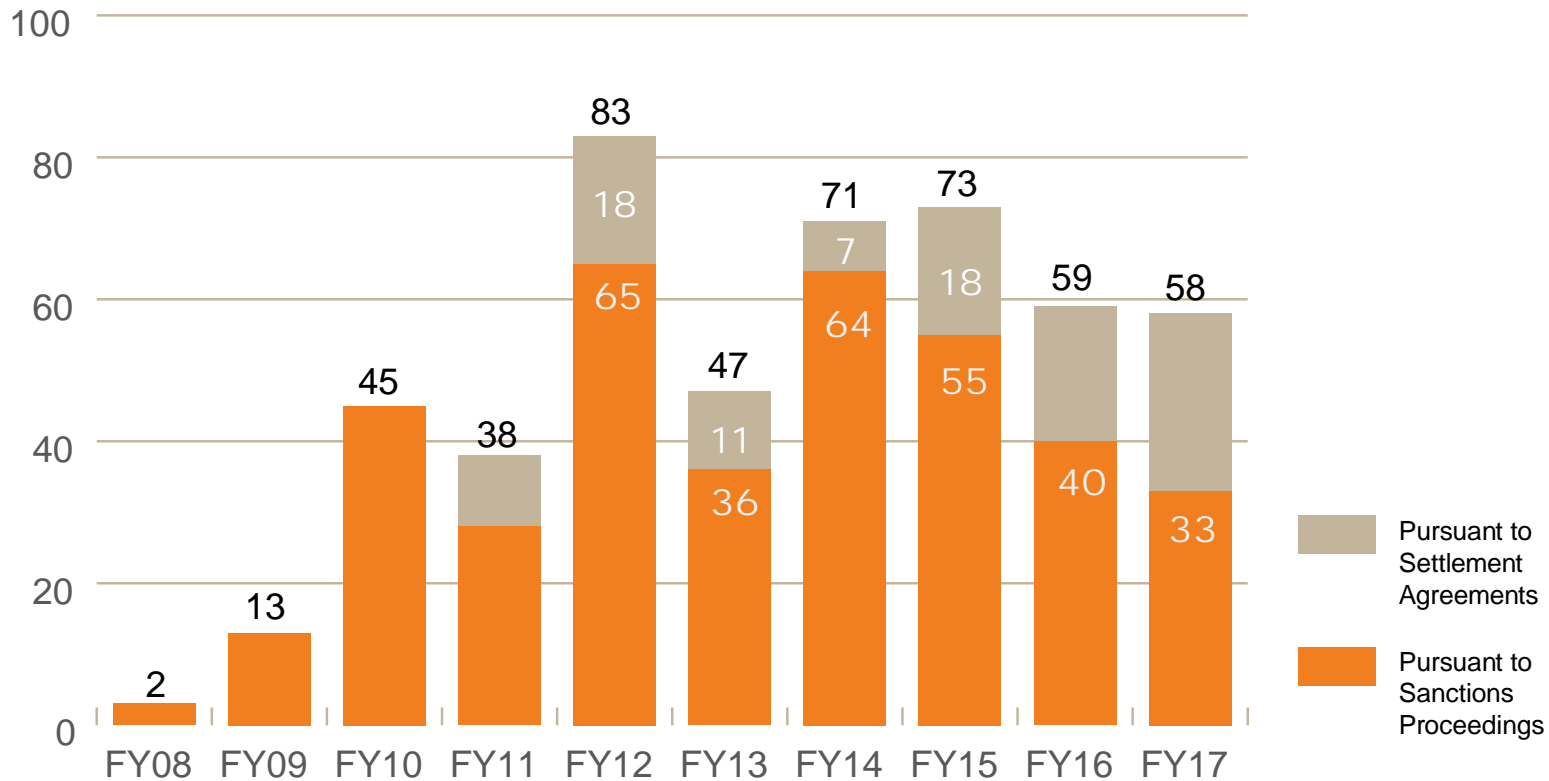
Since its inception, OSD has imposed temporary suspensions on 427 firms and individuals. This chart shows the total by fiscal year and highlights the proportion of those temporary suspensions that were imposed pursuant to the “early temporary suspension” (ETS) procedure.

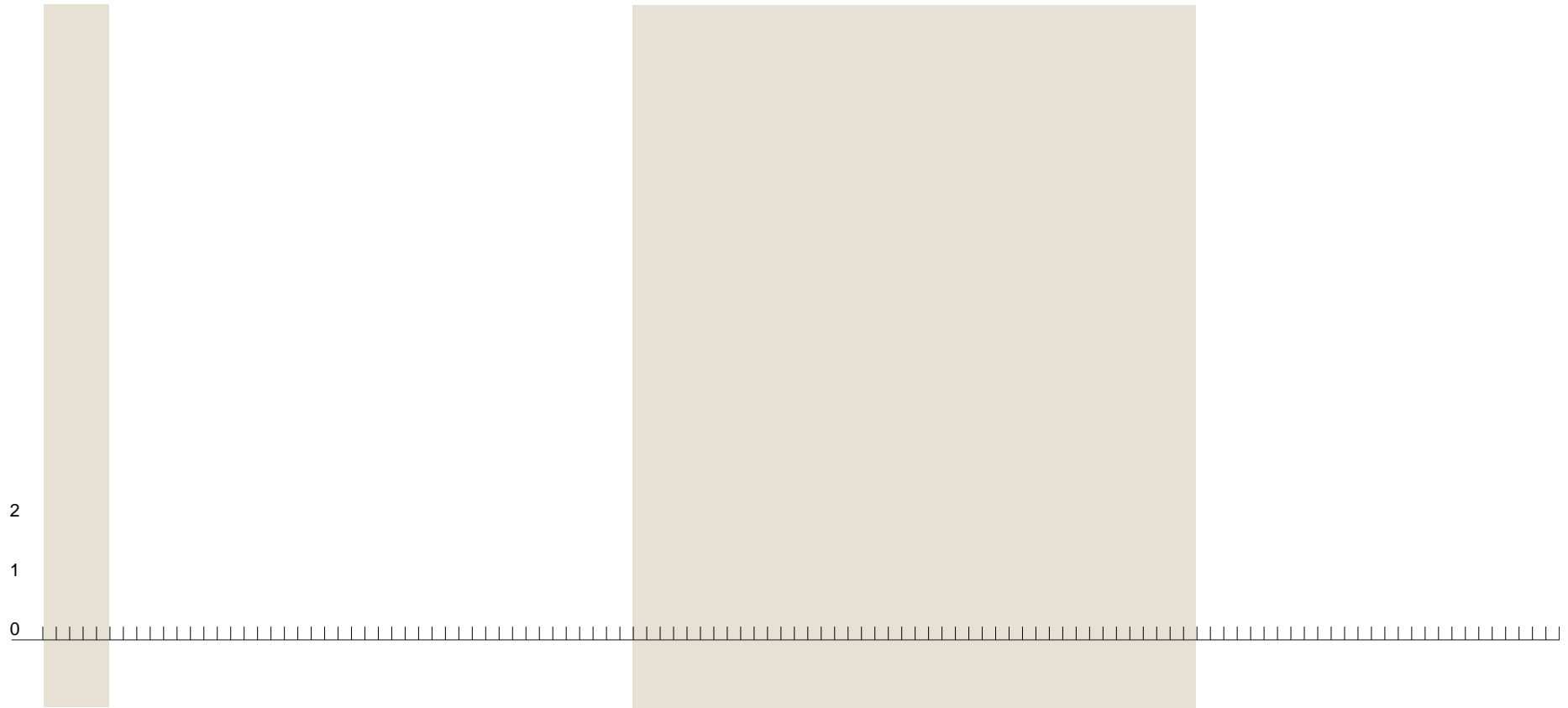




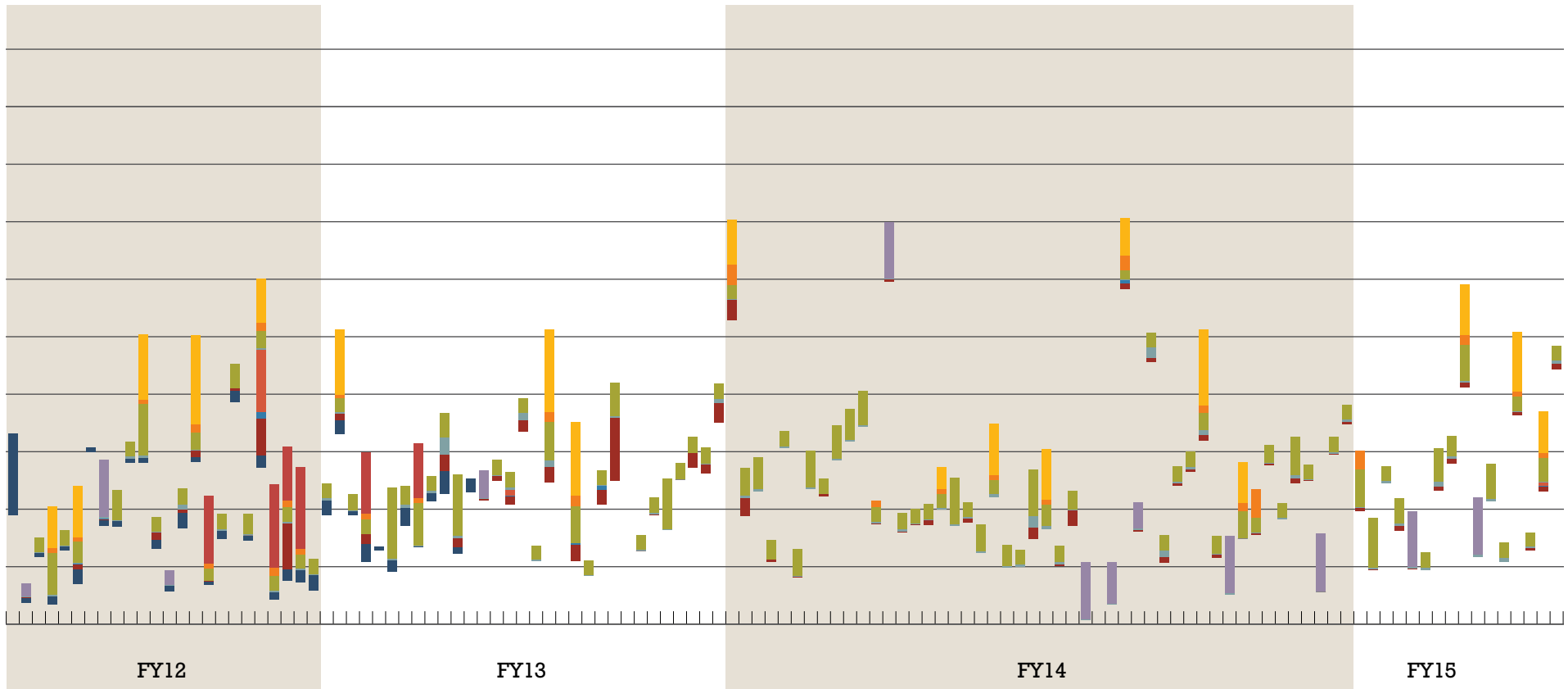
# NUMBER OF DEBARMENTS AND OTHER SANCTIONS IMPOSED ON FIRMS/INDIVIDUALS

The World Bank has imposed 489 debarments and other sanctions on firms and individuals since the creation of the two-tier sanctions system. This chart shows the total number of sanctions imposed by fiscal year and highlights the proportion of sanctions that were imposed pursuant to settlement agreements, as opposed to sanctions proceedings.





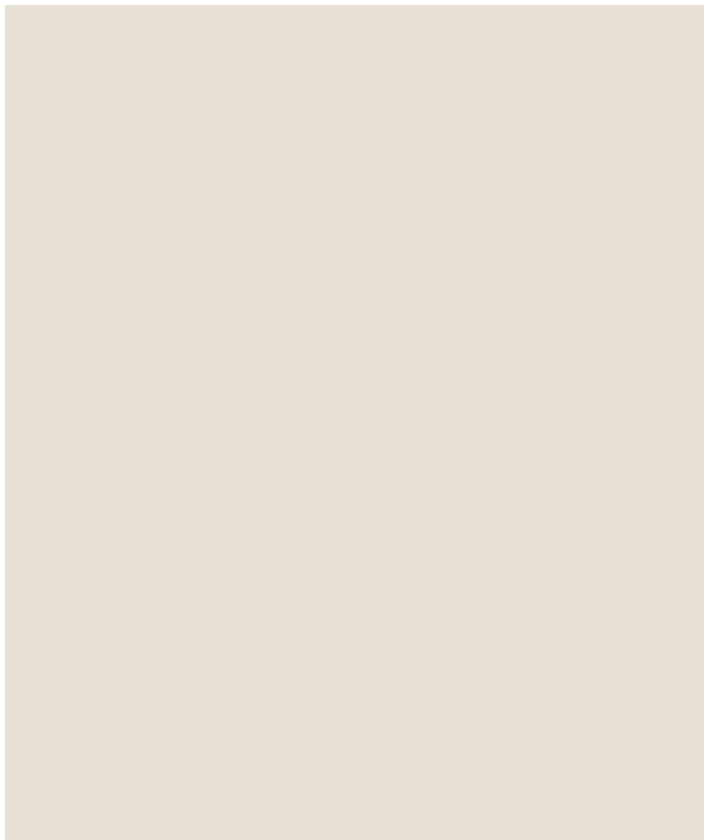
While this data gives a useful overview of the activity in the sanctions system and the typical life cycle of sanctions cases, it must be noted that many factors can have an impact on the timeline of a particular case, such as the complexity of the matters involved, stays for unsuccessful settlement negotiations during investigations, the need to obtain legal and procurement policy advice on case-specific matters, extensions to submission deadlines and additional submissions requested by the parties.



Notes:

1. All data as of June 30, 2017. Includes all submitted cases, including cases with multiple respondents, the date given to permit constructive delivery. Since it relates to the Sanctions Board issued a determination imposing the SDO's (SAEs and RTSs), and as such averages may be slightly downward because of cases that are pending in each stage (e.g., as of June 30, 2017, Case No. 478 had been with OSD for initial review for 23 days, but the initial review stage can be expected to be greater than the 23 days currently shown as of June 30, 2017).
2. For cases with multiple respondents, the date given to permit constructive delivery is the date of delivery of Notice, (ii) receipt of Response, (iii) date of determination is the latest of the three respondents, as have delivery delays under the new Sanctions Procedures. See the sanctions system website ([www.worldbank.org/sanctions](http://www.worldbank.org/sanctions)) for updated information and copies of recent Sanctions Board decisions and SDO determinations.
3. Four cases (Case Nos. 98, 100, 103 and 111) that were initially issued between July and September 2009 were reissued under the new Sanctions Procedures in March 2010. For untested cases for which the Notice was issued prior to such date, the date of determination reflecting the imposition of the sanctions recommended by the SDO in the Notice. For untested cases for which the Notice was issued on or after September 15, 2010, OSD issued the determination.
4. For untested cases for which the Notice was issued on or after September 15, 2010, OSD issued the determination.

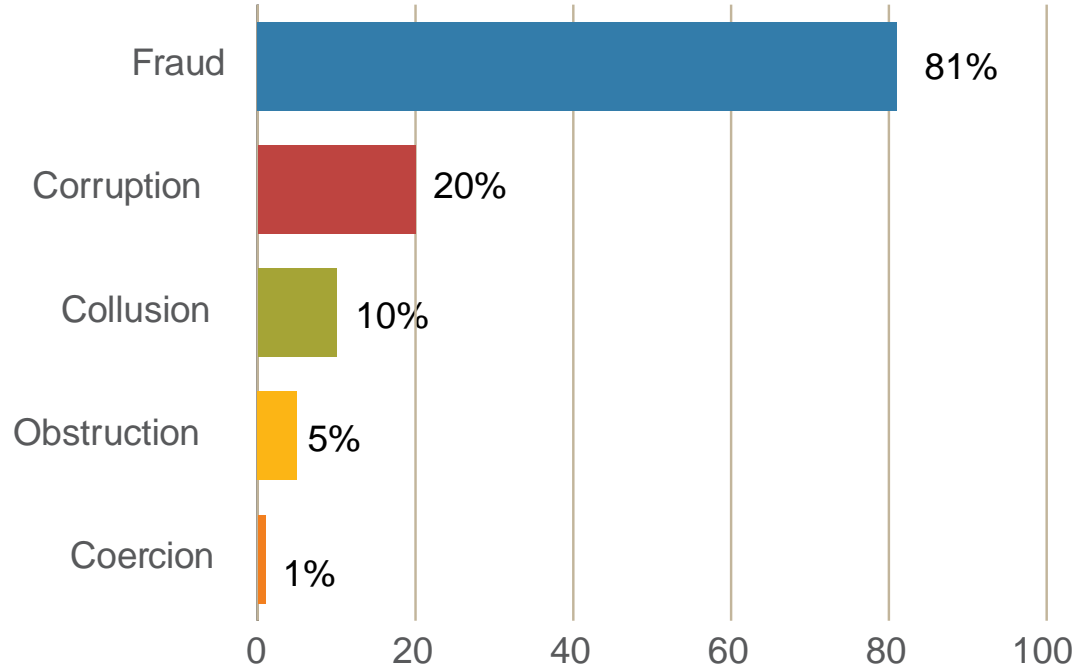
See Annex A for Detailed Breakdown of Duration of Cases





## TYOLOGY: PERCENTAGE OF CASES/SETTLEMENTS RECEIVED BY TYPE OF SANCTIONABLE PRACTICE

This chart shows what percentage of the cases and settlements received by OSD since its inception have involved claims of each type of sanctionable practice: fraudulent practice, corrupt practice, collusive practice, obstructive practice and coercive practice. The total of the percentages exceeds 100% because a number of cases have involved claims of more than one type of sanctionable practice (for example, payment of a bribe (corrupt practice) and the submission of false documents (fraudulent practice)). For a further breakdown of the types of fraudulent practice claims, see Typology: Breakdown of Fraudulent Practice Claims.



## TYOLOGY: BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS

This detailed breakdown shows the different types of fraudulent practice claims that have appeared in sanctions cases received from INT. First, a distinction is made between fraud cases that involve the forgery of third-party documents and those that involve other types of fraud. Then, within each of these two streams, a further categorization is done to reflect the specific type of forgery or other fraud. For example, within the forgery stream, common instances are fraudulent bid securities, performance certificates and manufacturer's authorizations. Within the other stream, common instances are misrepresentations of experience, over-invoicing and failure to make required disclosures of conflicts of interest. The totals at the bottom of each column show how often INT has sent each type of claim to OSD for decision-making.

Total No. of Cases	Case Type	Type of Fraud									Misrepresentation Regarding Past Performance	Misrepresentation Regarding Future Performance	Other Fraud	
		Forged Third Party Documents				Other Fraud								
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation or Omission Regarding Conflict or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance	Other Fraud				
320	SAEs and RTSs	44	29	57	18	26	41	46	18	53	34	69	19	2
96	Settlements	2	3	7	5	20	21	18	12	20	9	14	0	0
Total Number of Instances		46	32	64	23	46	62	64	30	73				
Total Number of Forgery Cases vs. Other Fraud Cases		163				1								
Total Number of Cases by Type of Sanctionable Practice		339									43	83	19	2
Cases with more than 1 type of misconduct						59								

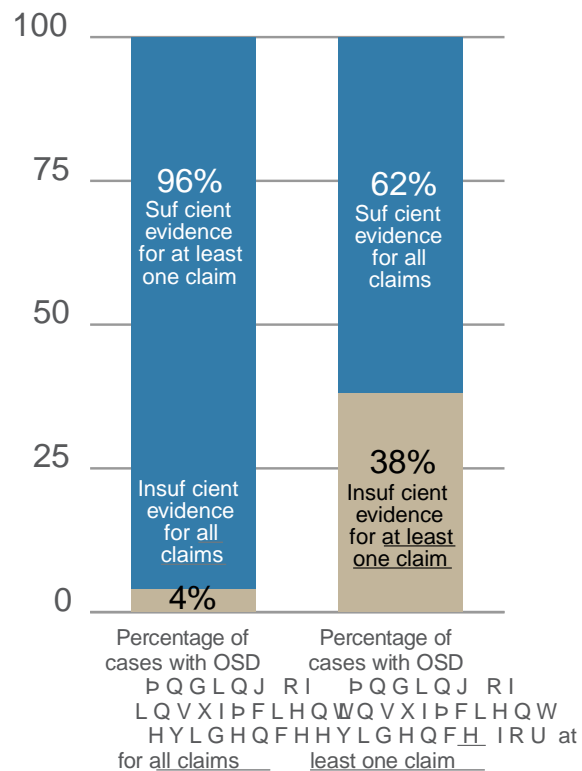
See Annex B for Detailed Breakdown of All Fraudulent Practice Claims

# OSD DETERMINATIONS BY CASE

In 96% of the cases that OSD has reviewed to date, OSD determined that there was sufficient evidence to support at least one of the claims made by INT.

In 38% of the cases reviewed, OSD determined that there was insufficient evidence to support one or more of the claims made by INT, resulting in the referral of the case back to INT for revision:

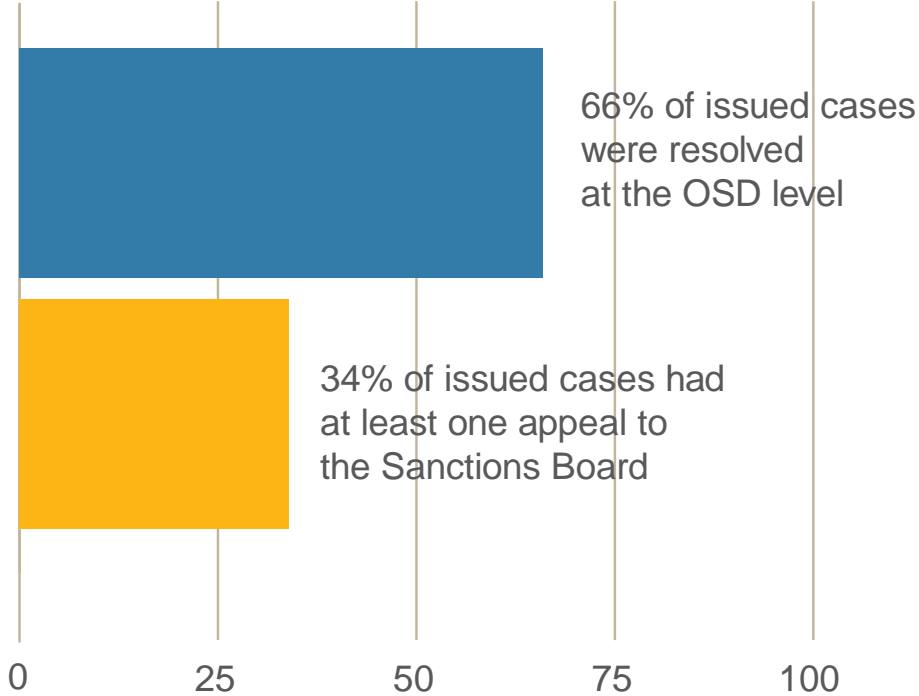
- In a to:1163..6 79.52969m0 00 9063.7 m0 0 l641.1740 ITIO.860 10 BT0.14.87.251 0 1 Tf8.28 0 0 8.28 100.9557 12614.6941ET0.1(ev20 0 l(ev20410066l9.9 1005.28 10 OSD)03, O40





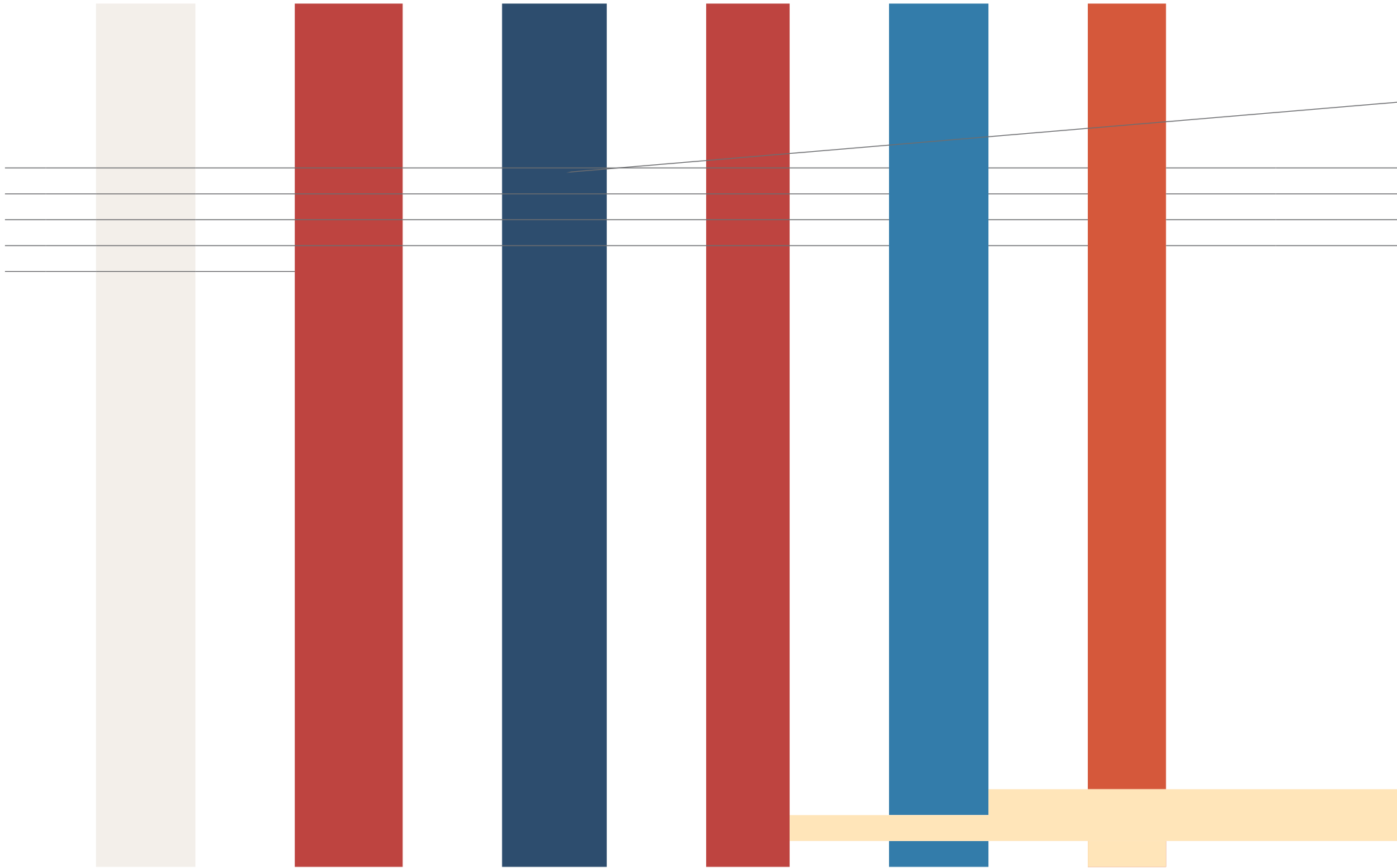
# PERCENTAGE OF ISSUED CASES RESOLVED AT OSD LEVEL

This chart shows the percentage of sanctions cases issued by OSD in which none of the Respondents submitted an appeal to the Sanctions Board, meaning that those cases were resolved at the OSD level.





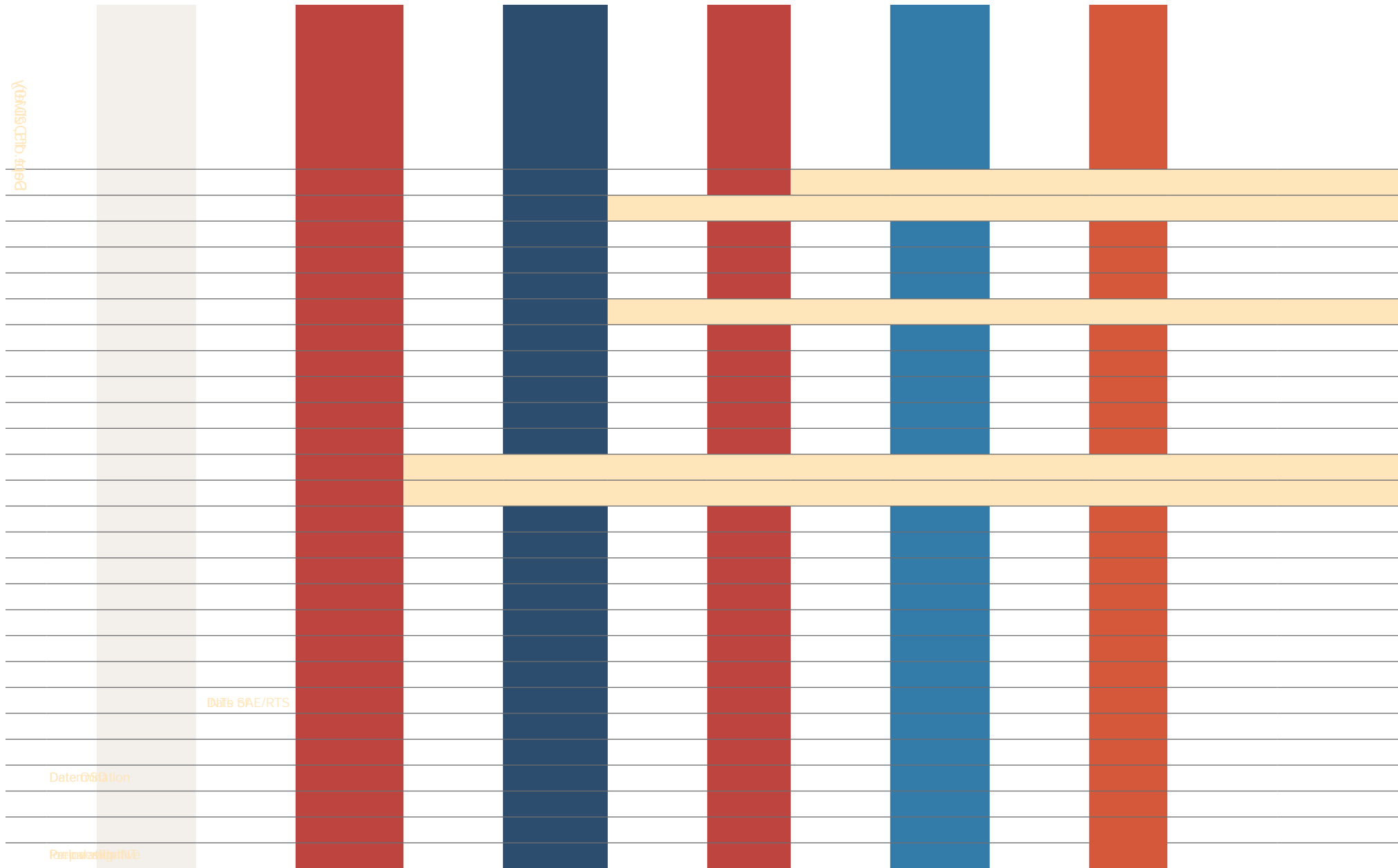




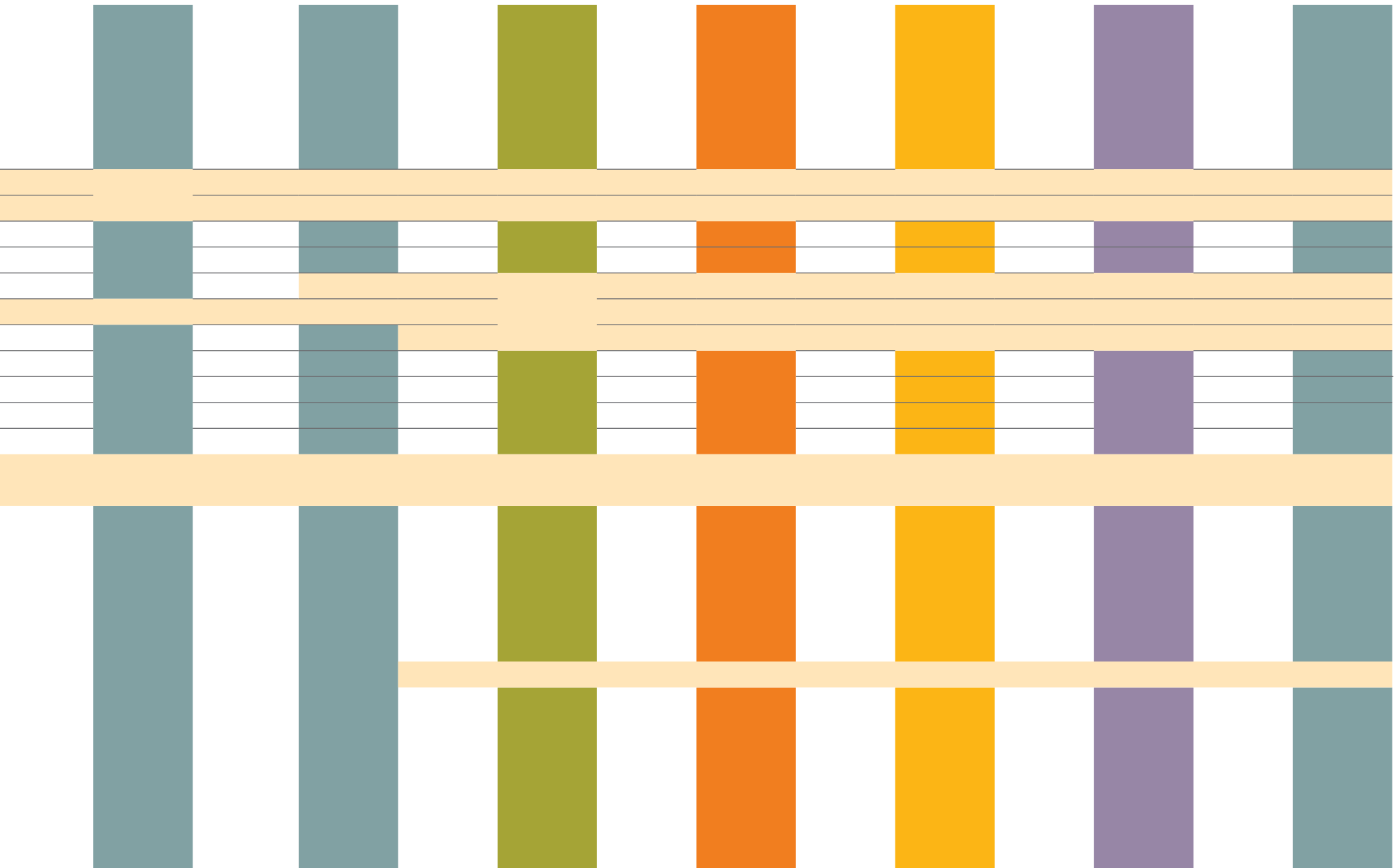


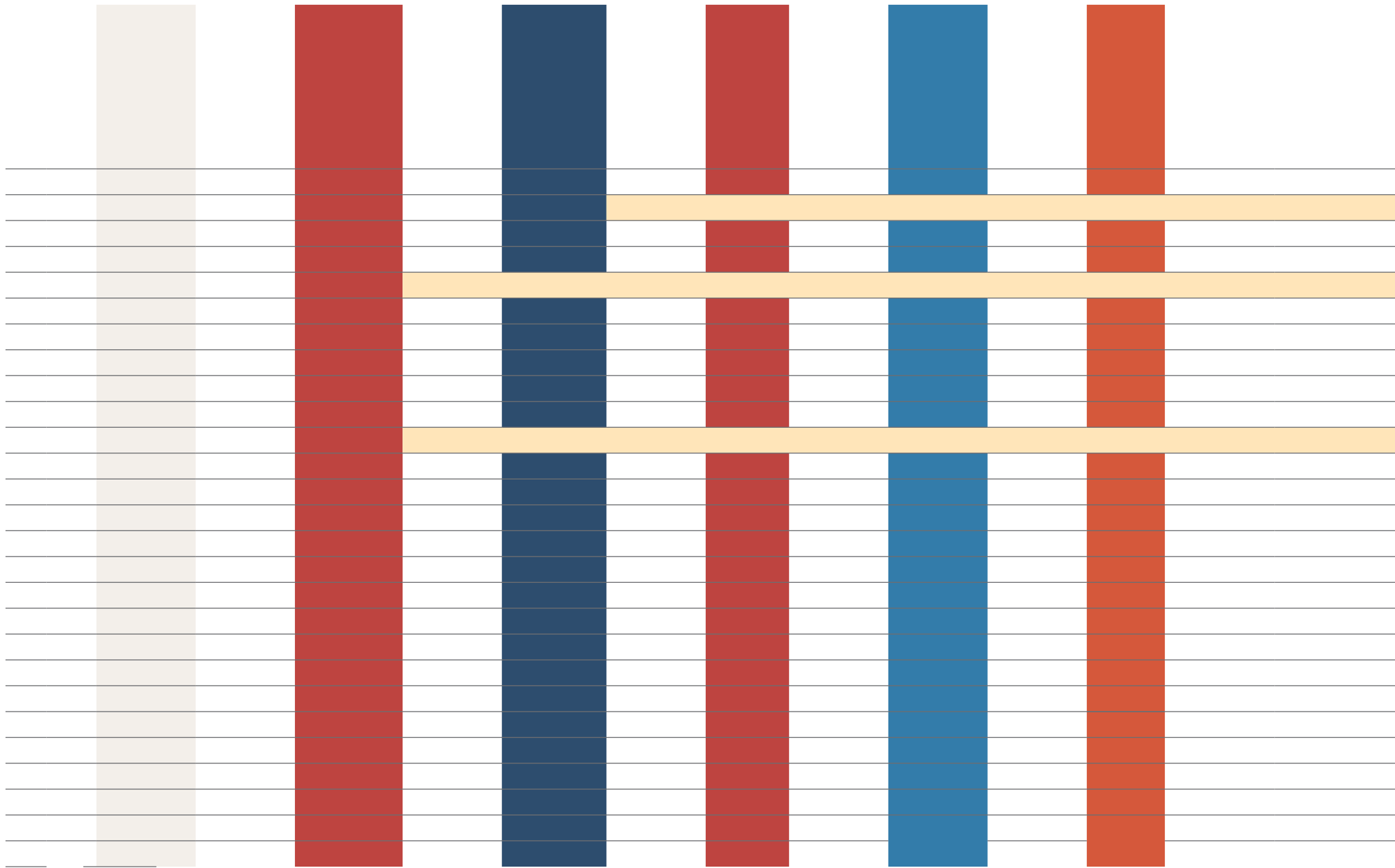










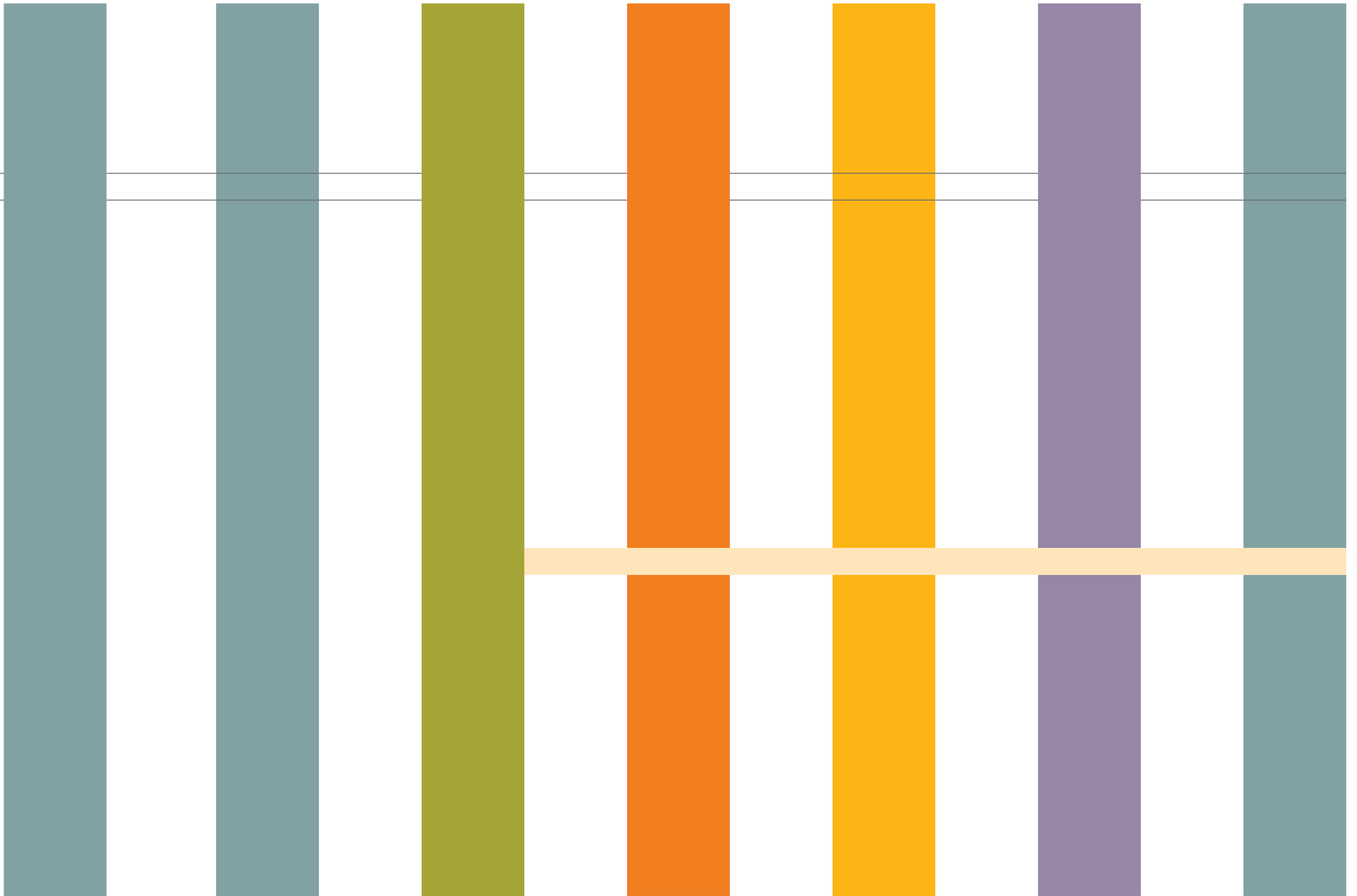






Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date of Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent to Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
7	10/15/12		01/15/13	96							412	200
11	11/09/12		02/08/13	95							892	198
11	12/17/12	03/08/13		87	04/03/13	26	05/19/14	411			1869	663
4	09/04/12		12/04/12	105							825	130
4	02/22/13	05/15/13		89	06/24/13	40	07/15/14	386			1088	692
RTS Stayed at INT's Request on 9/19/12; Superseded by SAE and Deemed Withdrawn by INT on 3/8/13											492	22
12	11/14/13		02/14/14	451							865	532
17	02/08/13		05/10/13	123							878	252
5	10/01/12	06/19/13		266	07/22/13	33	07/09/14	352			1150	658
11	12/05/12		03/07/13	97							941	160
108	10/29/13		03/31/14	157							1341	511
12	12/16/13		03/19/14	393							950	499
Case Closed by OSD on 2/19/13 for Insufficiency of Evidence											925	84
4	01/30/13								07/26/13	178	977	217
6	03/19/13		06/18/13	99							1044	173
17	08/27/13		11/26/13	96							964	305
48	04/02/14		07/02/14	93							1434	497
6	03/12/13		06/11/13	91							500	100
43	03/24/14	11/19/14		243	01/22/15	64	06/29/16	524			1871	1209
Settlement on 4/17/13											443	22
2	08/26/13	04/14/14		234	06/23/14	70	09/29/15	463			1279	915
1	04/08/13		07/09/13	96							404	98
7	10/01/13		01/02/14	98							979	259
6	11/11/14		02/10/15	216							1533	652
Case Closed by OSD on 7/11/13 for Insufficiency of Evidence											1607	52
8	07/02/13		10/01/13	96							567	134
8	07/05/13		10/04/13	99							803	128
3	02/03/14		05/06/14	319							921	341







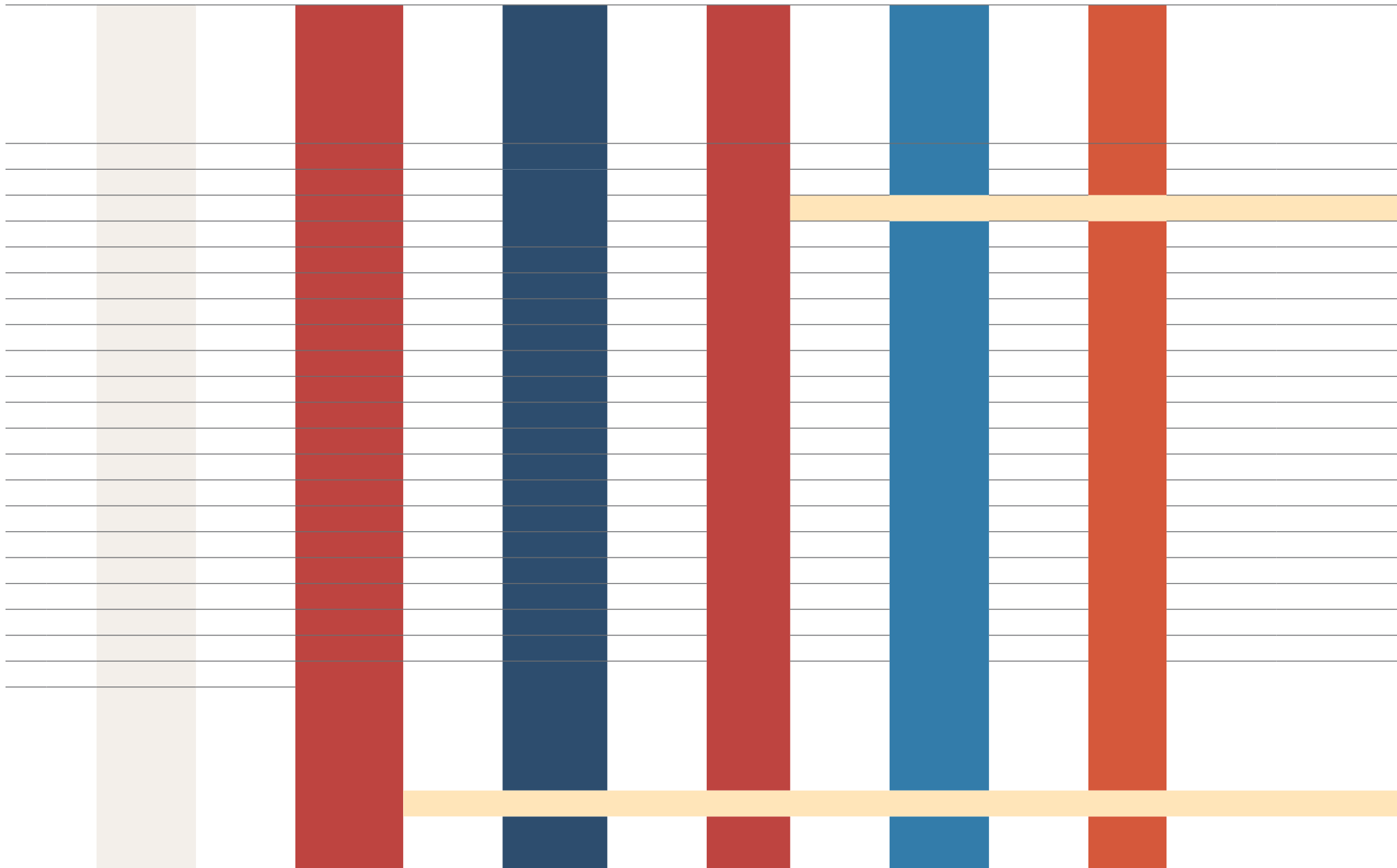




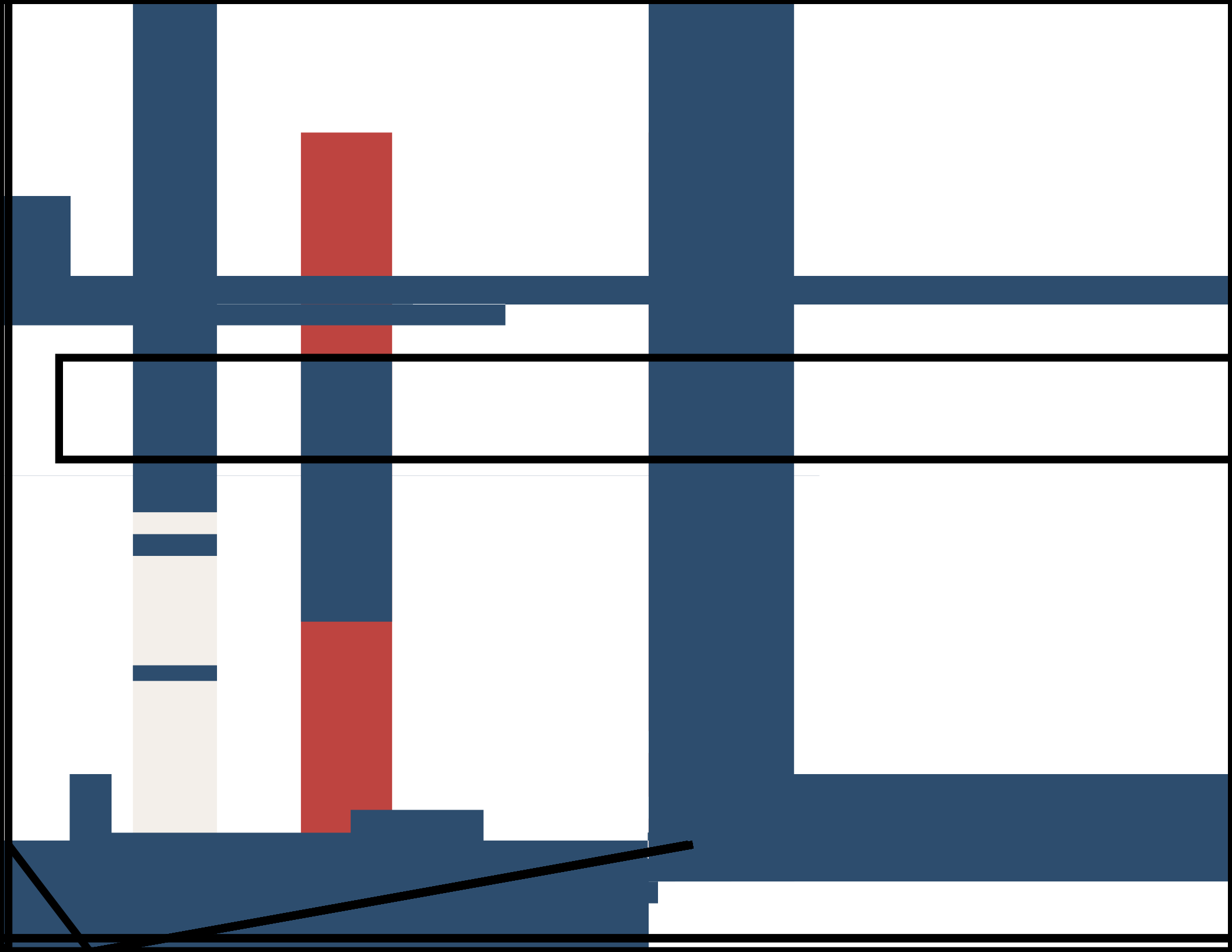
## DETAILED BREAKDOWN OF DURATION OF CASES continued

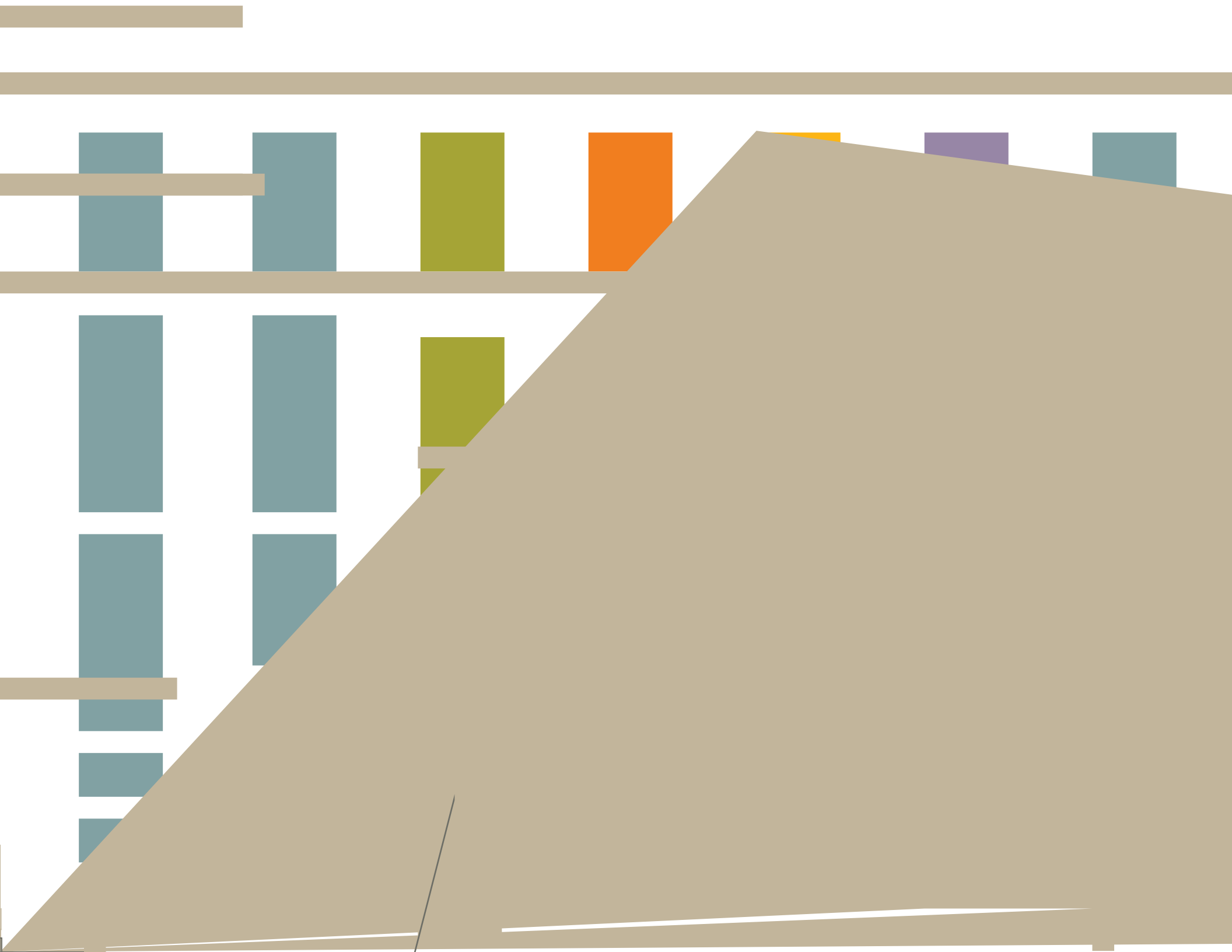
Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RTA to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept. 15, 2010)	
221.	TS15	10/18/13	08/20/14	306	10/03/14	44	10/06/14	3				10/15/14	
222.	355	10/03/13	09/08/14	340	09/12/14	4						09/26/14	
223.	310	10/11/12	09/18/14	707	02/05/15	140	02/27/15	22				04/02/15	
224.	329	03/08/12	09/30/14	936	12/24/14	85	01/21/15	28				02/04/15	
225.	339	01/05/11	09/30/14	1364	02/13/15	136	03/16/15	31				03/27/15	
226.	TS16	10/24/13	10/27/14	368	12/22/14	56						01/06/15	
227.	369	09/20/12	11/04/14	775	11/13/14	9						11/24/14	
228.	351	11/19/13	11/20/14	366	12/22/14	32						01/15/15	
229.	372	06/01/11	12/03/14	1281	01/15/15	43	02/03/15	19				02/11/15	
230.	377	11/18/13	12/19/14	396	03/02/15	73	03/13/15	11				03/24/15	
231.	354	10/10/12	12/22/14	803	01/30/15	39	02/27/15	28	03/06/15	7	03/27/15	21	03/31/15
232.	383	09/08/10	12/23/14	1567	02/13/15	52	03/17/15	32					04/08/15
233.	352	11/19/13	01/14/15	421	03/11/15	56							04/08/15
234.	357	10/16/13	01/14/15	455	05/29/15	135	06/08/15	10					06/25/15
235.	TS18	11/05/13	01/23/15	444	03/06/15	42							03/23/15
236.	TS17	10/30/14	01/27/15	89	03/06/15	38	03/12/15	6					03/19/15
237.	348	03/08/12	02/02/15	1061	04/13/15	70	05/14/15	31					05/27/15
238.	347	01/23/14	02/19/15	392	06/30/15	131	07/28/15	28					08/03/15
239.	349	09/19/12	03/02/15	894	05/04/15	63	05/15/15	11					06/01/15
240.	368	11/16/12	03/12/15	846	05/15/15	64	07/07/15	53					07/10/15
241.	364	07/09/13	03/13/15	612	04/24/15	42	10/20/15	179					10/26/15
242.	376	09/03/13	03/26/15	569	08/13/15	140							08/25/15
243.	375	01/09/14	04/29/15	475	06/01/15	33							06/22/15
244.	387	01/02/14	05/05/15	488	06/30/15	56	07/28/15	28					08/03/15
245.	393	10/24/12	05/13/15	931	08/06/15	85	08/24/15	18					09/02/15
246.	TS19	12/08/14	05/18/15	161	07/20/15	63	08/14/15	25					08/19/15
247.	392	02/02/15	05/20/15	107	08/25/15	97							08/31/15
248.	397	11/07/13	05/20/15	559	07/13/15	54	07/15/15	2					07/20/15





	Period with OSD for Final Review and Issuance (Days)	Date of Delivery of Notice to Respondents (if Issued after Sept. 15, 2010)	Date of Respondent's Response (if any) Received by Sanctions Board	Date of SDO Determination (if any) in Uncontested Cases	Period with Respondent Contest Case (Days)	Date of INT's Reply	Period with INT for Reply (Days)	Date of Sanctions Board Decision	Period for Additional Submissions, Hearing, and Sanctions Board Review (Days)	(for ETS) Date of Submission of INT's SAE or Termination	(If Appl.) (for ETS) Period with INT for Further Investigation (Days)	Cumulative Duration (Days)	Cumulative Duration from Submission of INT's SAE/RTS to OSD (Days)
	5	06/30/15								06/21/16	365	585	376
	9	11/06/15		02/05/16	99							696	227
Case Closed by OSD on 10/6/15 for Insufficiency of Evidence												566	98
	5	10/15/15		01/14/16	171							723	197
	6	09/14/15		12/15/15	97							734	161
	7	09/07/15	02/04/16		154	03/07/16	32	06/21/17	471			1198	701
	6	10/05/15		01/05/16	111							796	160
	8	10/21/15		01/20/16	99							1198	147
	2	09/25/15								09/16/16	365	415	386
	22	10/12/15		01/12/16	97							662	134
	7	10/16/15								10/06/16	365	435	400
	4	10/26/15								10/06/16	353	435	377
	3	10/21/15	01/19/16		92	03/03/16	44	06/16/17	470			997	624
	8	11/27/15	04/28/16		156	06/28/16	61	06/23/17	360			1430	627
	4	11/09/15		02/09/16	98							617	118
	5	02/22/16		05/24/16	161							805	223
	5	04/05/16	07/01/16		92	08/04/16	34	Pending	330			1230	602
	20	04/29/16	08/29/16		125	10/27/16	59	Pending	246			2473	577
	10	07/19/16		10/18/16	95							1421	321
	5	01/04/16		04/05/16	98							433	119
	6	05/08/16		08/09/16	96							1275	244
	2	01/11/16								06/07/16	151	922	169
	2	07/23/16	02/08/17		315	04/11/17	62	Pending	80			2125	556
	5	04/18/16		07/19/16	167							615	210
	269	02/20/17		05/23/17	96							1307	504
nce												2293	81
	9	04/25/16		07/26/16	97							552	173
	5	03/18/16		06/17/16	102							767	122





Case No.	Date of Earliest Investigative Activity Reflected in Case Exhibits	Date of Submission of INT's SAE/RT to OSD	Period with INT for Investigative Activity and Case Preparation (Days)	Date OSD Determination Sent to INT	Period with OSD for Initial Determination (Days)	(If Appl.) Date INT's Revisions Sent to OSD	(If Appl.) Period with INT for Revision (Days)	(If Appl.) Date OSD Provided Supplemental Determination (2nd Review)	(If Appl.) Period with OSD for Supplemental Determination (Days)	(If Appl.) Date INT's 2nd Revision Sent to OSD	(If Appl.) Period with INT for 2nd Revision (Days)	Date Notice Issued to Respondent (and Suspension Imposed after Sept.15, 2010)
306	448	03/26/13	1402	Pending	155							
307	465	06/17/15	590	Pending	154							
308	464	12/19/13	1154	Pending	135							
309	466	04/17/15	679	04/19/17	54	Pending	72					
310	468	09/16/15	551	Pending	102							
311	TS30	03/14/14	1102	04/18/17	29	Case Closed by OSD on 4/18/17 for Insufficiency of Evidence						
312	406	03/03/15	771	Pending	79							
313	460	08/22/16	233	05/22/17	40							05/31/17
314	482	11/27/15	531	Pending	50							
315	488	09/20/15	599	Pending	50							
316	436	02/19/16	458	06/19/17	28	Pending	11					
317	474	06/21/15	703	Pending	37							
318	478	12/18/15	537	Pending	23							
319	405	03/05/15	847	Pending	1							
320	483	06/17/14	1109	Pending	0							
Average Duration in Days			727		65		93		40		76	

\*\*"Pending" means pending as of June 30, 2017.

Notes:

- All data as of June 30, 2017. Includes all submitted cases (SAEs and RTs). Such averages may be skewed slightly downward because of cases that are pending in each stage (e.g., as of June 30, 2017, Cases with OSD for initial review for 23 days, but the initial review remained pending, such that the actual number of days for this stage can be expected to be greater than the 23 currently shown as of June 30, 2017).
- In cases with multiple respondents, the date given for (i) delivery of Notice, (ii) receipt of Response, (iii) date of extension and/or (iv) uncontested determination is the latest applicable date (e.g., if the Notice is delivered to the three respondents in a case, the latest date is used). Also if at least one but not every respondent in a case appealed to the Sanctions Board, dates are given for both (i) receipt of Response and (ii) receipt of Appeal.

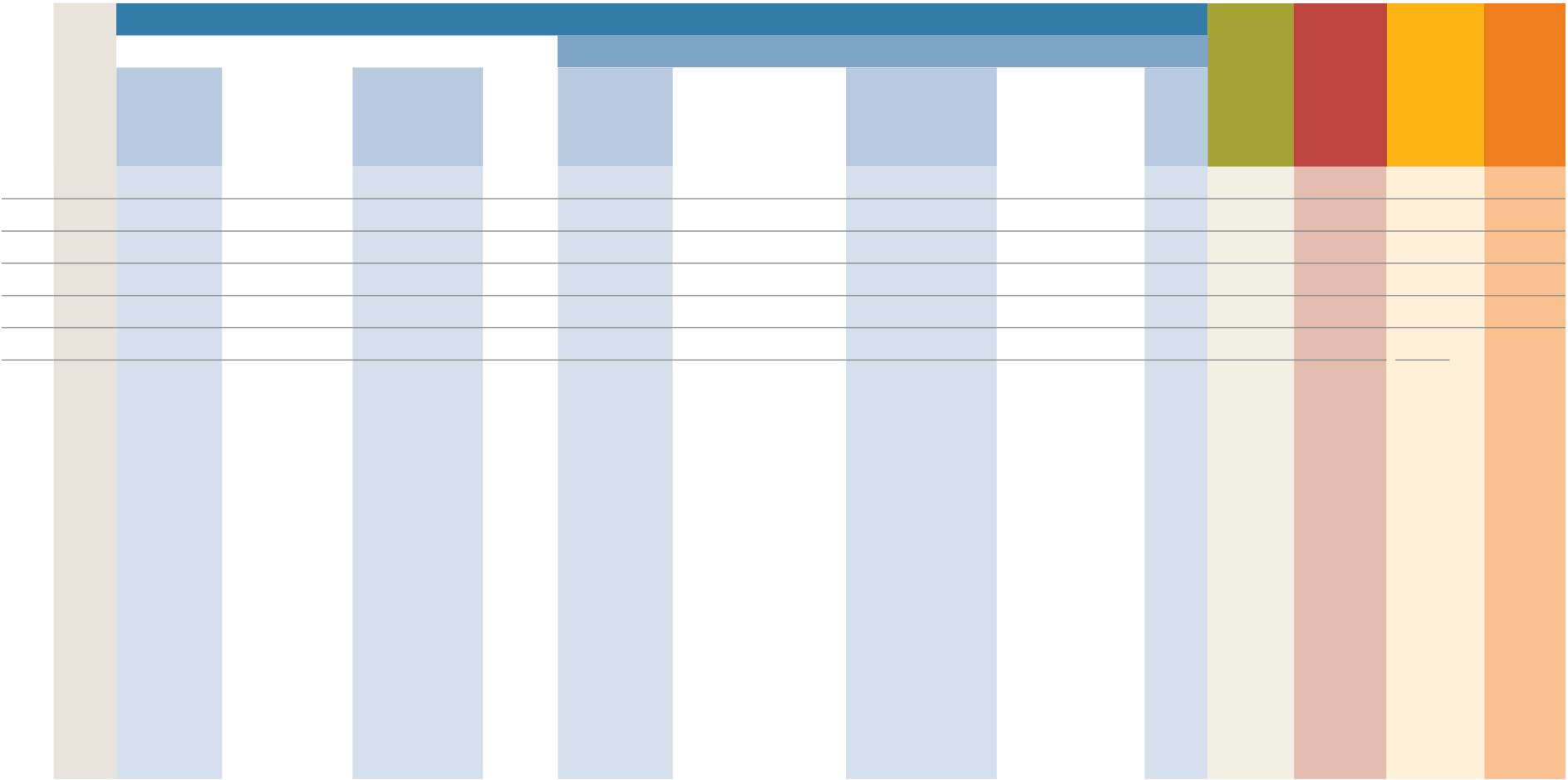
Notes:

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# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS





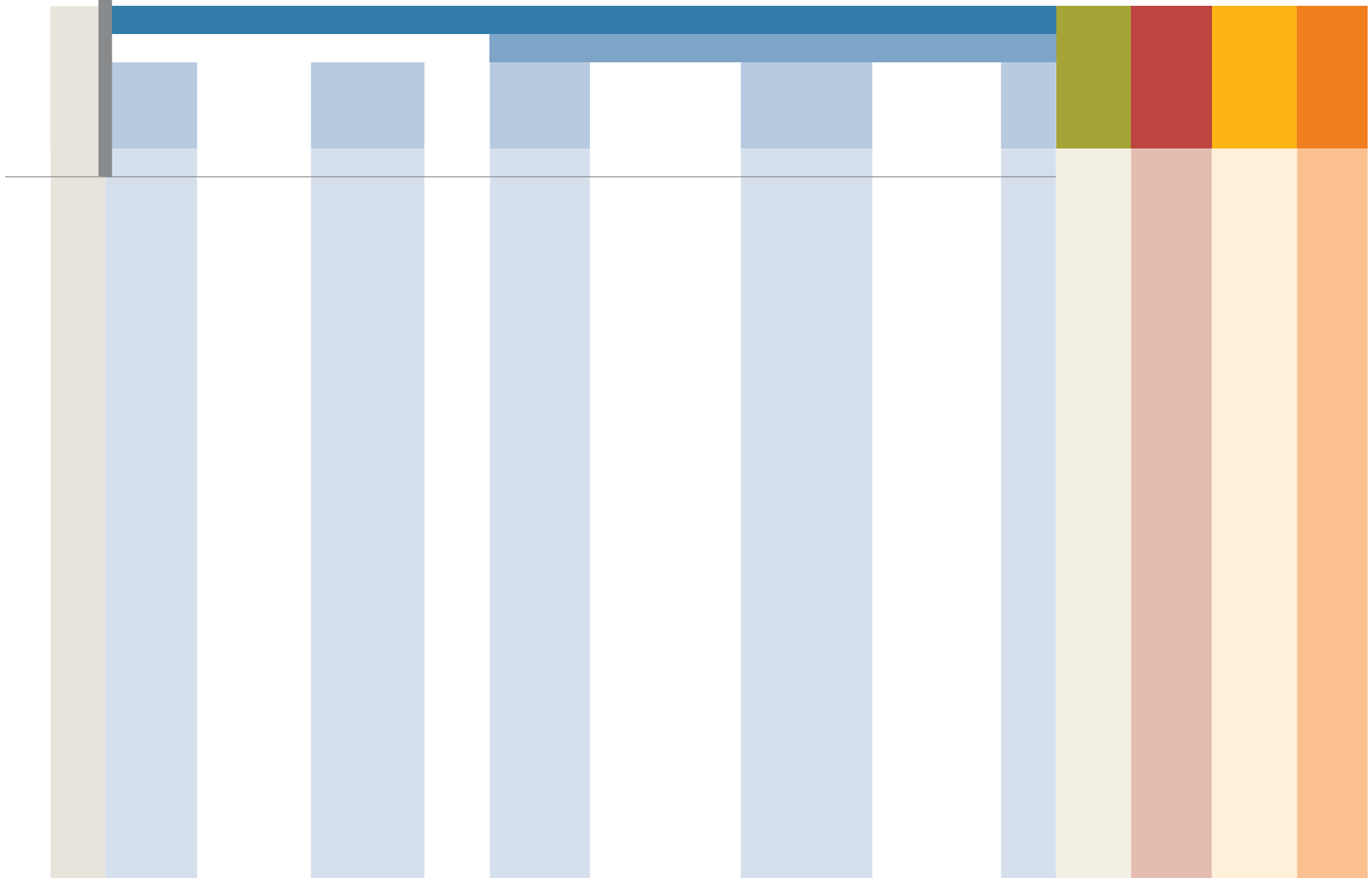
# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued



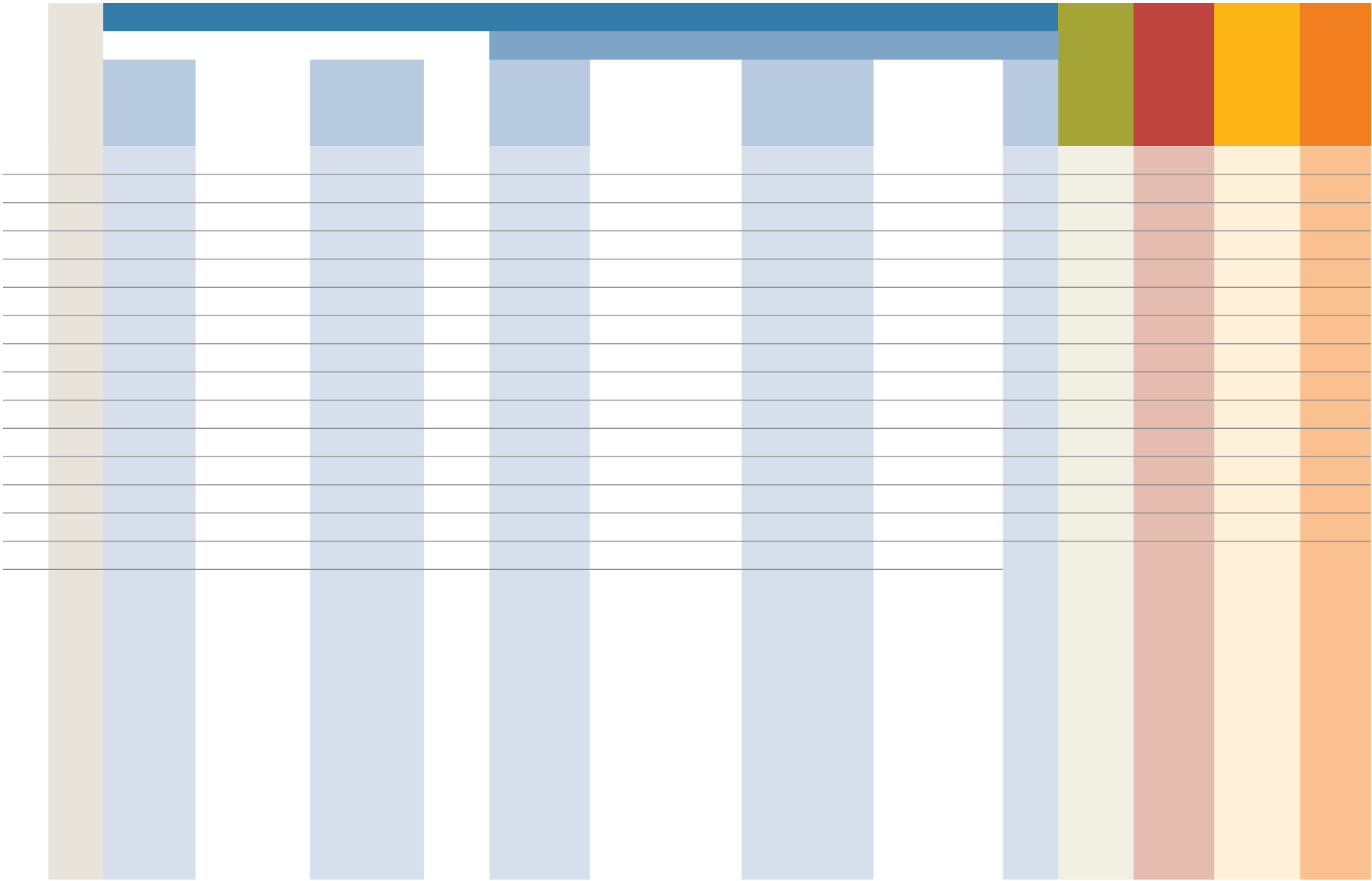
# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued



# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued



# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued

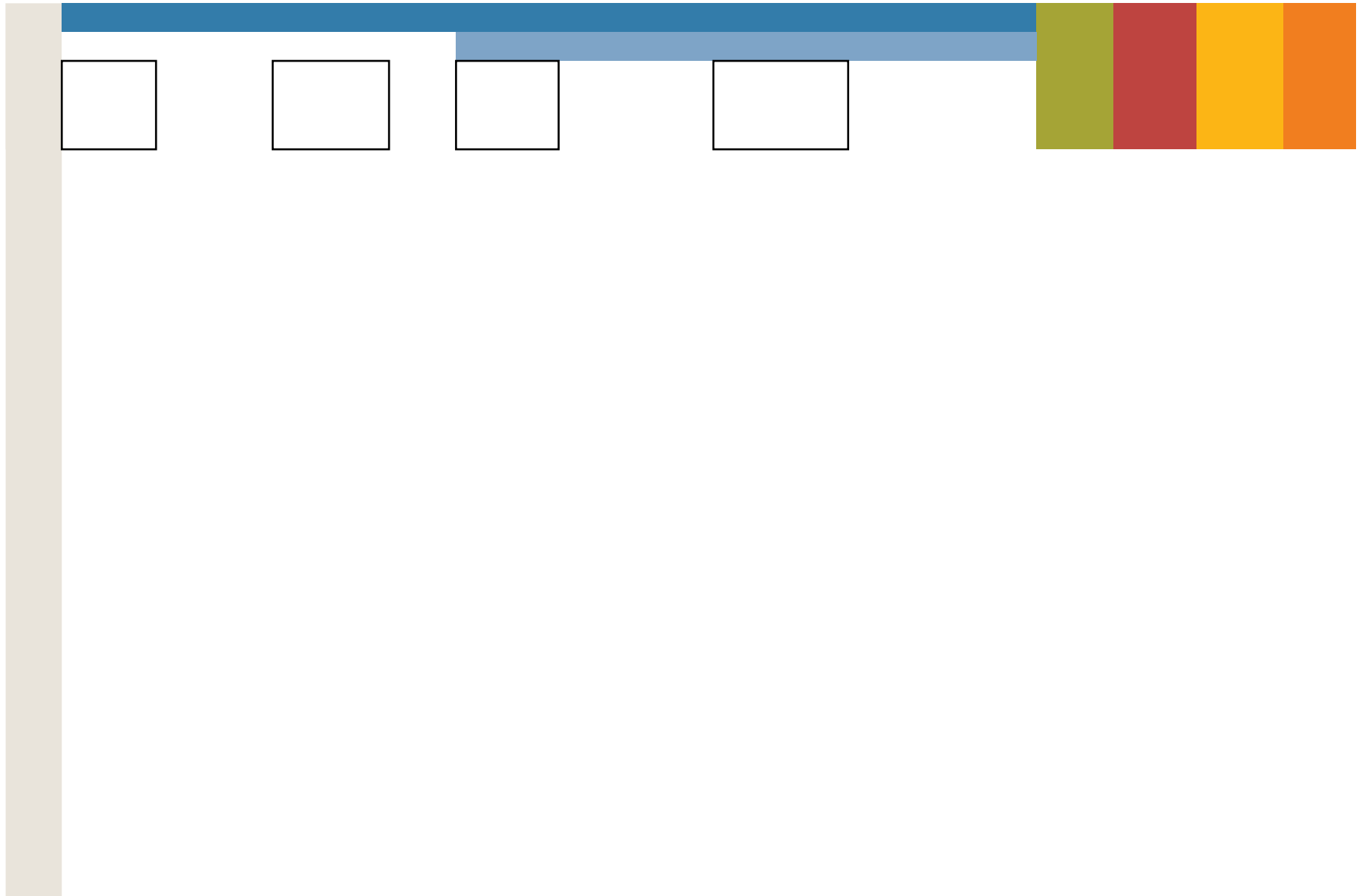








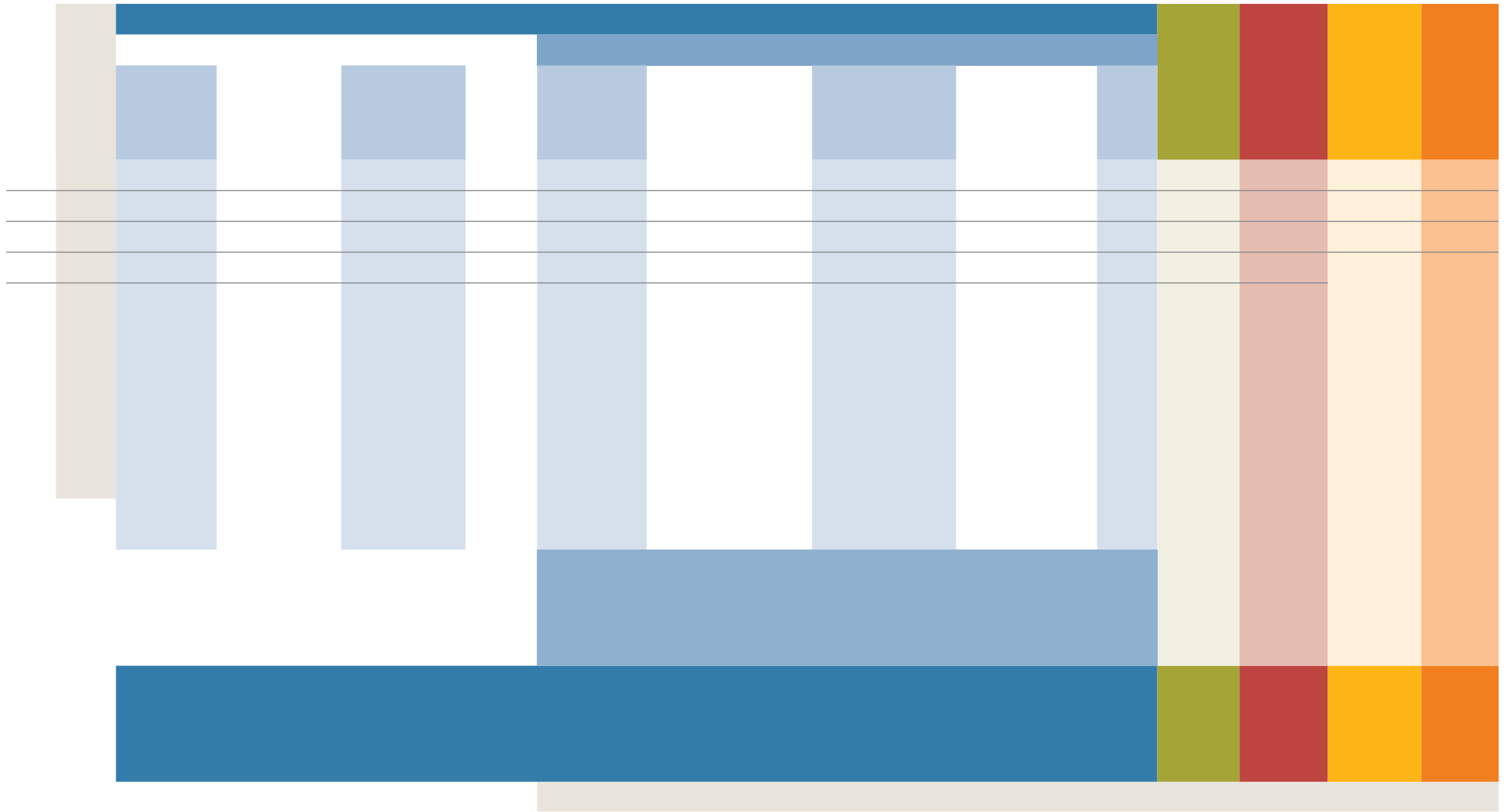
# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued



















# DETAILED TYPOLOGY WITH BREAKDOWN OF FRAUDULENT PRACTICE CLAIMS continued

## Settlements

		1												
		Forged Third Party Documents				Other Fraud								
		Forged Bank Guarantees or Securities	Forged Manufacturer's Authorizations	Forged Performance or Experience Documentation	Other Forgery	Fraudulent Invoices or Payment Certifications	Misrepresentation Omission Regarding Contract or Agent	Misrepresentation Regarding Past Performance or Experience	Misrepresentation Regarding Future Performance					Other Fraud
79	Settlement													
80	Settlement													
81	Settlement													
82	Settlement													
83	Settlement													
84	Settlement													
85	Settlement	"												
86	Settlement													
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88	Settlement													
89	Settlement													
90	Settlement													
91	Settlement													
92	Settlement													
93	Settlement													
94	Settlement													
95	Settlement													
96	Settlement													
Total Number of Instances		2	3	7	5	20	21	18	12	20				
Total Number of Forgery Cases vs. Other Fraud Cases		17												
Total Number of Cases by Type of Sanctionable Practice												1	0	0
		Cases with more than 1 type of misconduct											6	

### Useful Web Links

[www.worldbank.org/sanctions](http://www.worldbank.org/sanctions)

[www.worldbank.org/debar](http://www.worldbank.org/debar)

[www.worldbank.org/integrity](http://www.worldbank.org/integrity)

[www.worldbank.org/vdp](http://www.worldbank.org/vdp)

[www.worldbank.org/suspensiondebarment2017](http://www.worldbank.org/suspensiondebarment2017)

