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Georgia Dept of Early Care and Learning

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Area	Memo: General Information
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Unique Entity Identifier Transition

Purpose

This memorandum addresses questions raised by State agencies and Program operators regarding the transition from the Data Universal Numbering System (DUNS) number to the Unique Entity Identifier (UEI) number.

Legal Authority

CACFP 06-2023; SFSP 04-2023

Background

As of April 4, 2022, at the direction of the Office of Management and Budget (OMB), federal agencies completed system transitions to utilization of UEI. The transition from DUNS number to UEI numbers allows the government to streamline the entity identification and validation process, making it easier and less burdensome for entities to do business with the federal government.

Program Requirements

The UEI is a 12-character alphanumeric identifier assigned to an entity by the System for Award Management (SAM). Program operators are not required to complete full entity registration in the SAM to obtain the UEI and may go directly to SAM.gov to obtain the UEI only. The process is minimal and only validates the entity's legal business name and address. Program operators who have already completed full SAM.gov registration have been automatically assigned the UEI.

Child Nutrition Program operators including institutions, facilities, sponsoring organizations, schools, and sponsors are required to obtain the UEI to receive payments from State agencies. (2 CFR § 25.300 *Requirement for recipients to ensure subrecipients have a unique entity identifier*).

Grantees or subgrantees that had already been assigned a DUNS prior to the transition should have had

their DUNS number converted automatically to a UEI. However, entities with expired DUNS or those that had not yet obtained one needed to begin the process of obtaining one right away.

FNS is aware that after the transition in April 2022, GSA SAM.gov began to experience delays and entities faced challenges in completing the registration or reauthorization steps. As a UEI is required to apply for Federal funding opportunities, we have advised our Regional Program and Grants Management Administrative Services Offices, to work with their respective State agencies to develop a plan to bring their program operators into compliance. First, the State agency will need to determine which entities currently have a UEI and which do not. The State agency will then need to determine, for those entities without a UEI, if they have initiated the process to obtain a UEI or if they have applied but are experiencing issues with SAM.gov. If the entities are experiencing issues with SAM.gov, they should submit a help ticket to Helpdesk at GSA SAM.gov. The ticket number should be provided to the State agency for assistance should the issue not be resolved within a few weeks. If the State agency is unable to assist with the open ticket, it should be escalated to the Regional Office for further assistance. The Plan should also address entities that have failed to seek a UEI and provide technical assistance accordingly. A State must determine if the entity is trying to comply, i.e., is taking the necessary steps to obtain a UEI and simply is unable to do so for reasons out of their control.

To further assist State agencies in this process, FNS has developed the following Questions and Answers to support State agencies and Program operators through the transition.

Comments

For questions concerning this memorandum, please contact Policy Administrator at (404) 651-8193.

Questions and Answers

1. Is it a regulatory requirement that Program operators obtain the UEI number?
Yes. Per 2 CFR § 25.300, it is a regulatory requirement that Program operators, as subrecipients, obtain the UEI number and that State agencies ensure they have the UEI.

2. Are Program operators required to obtain a unique identifier from SAM.gov?
Yes. Program operators will need to obtain a UEI to adhere to regulations. Organizations will go to SAM.gov to request a UEI. They will not be required to complete the full entity registration process.

3. Can State agencies require Program operators to complete full registration in SAM in order to obtain the UEI?
Yes. State agencies can require Program operators to complete full SAM registration. However, as the full SAM registration is not a federal requirement, full SAM registration is considered an additional State agency requirement and will need FNS Regional Office approval.

4. If my organization is already registered in SAM.gov, what do we need to do to receive a UEI?
UEIs will automatically be assigned to existing entities in the SAM and made available for viewing in the SAM.

5. How will we be able to look up the UEIs of other organizations for reporting of subcontractor related information?
State agencies and Program operators will be able to search the SAM.gov website for entities and their UEI, similar to how entities can be searched for today in SAM.

6. Will searches for exclusions by DUNS number still be possible?
No, all DUNS Numbers will be removed from SAM.gov on April 4, 2022. You will need to use the Unique Entity ID (SAM) to search entity registrations, exclusions, and contract opportunity awards by entity identifier. You may always search using other unique fields such as entity name or CAGE instead of the Unique Entity ID (SAM).

7. Do you have to be active in SAM.gov to get a UEI assigned?
No, UEIs will be assigned to both existing entity registrations (active and inactive) and new registering entities.

8. I am a State agency and cannot view information on an entity. What should I do?
First make sure that the entity you are searching for has not opted out of public search. If the entity has, its records will only be viewable by federal users and users with a role in that entity.

You may also search for an entity using available filters using these steps. Select the arrow icon to the right of "Filter By" and find the "Entity" filter. Select the arrow next to "Entity" and filter by one of three ways:
a. Entity name
b. Unique Entity ID
c. CAGE/NCAGE code

9. Can State agencies make payments to Program operators if Program operators do not have the UEI?
USDA/FNS acknowledges the long-standing relationship State agencies have with their Local Child Nutrition Program Operators and understands the negative impact stopping program payments would have on the programs and children they serve. However, FNS expects that State agencies would be actively working with their Program operators to bring them into compliance. These efforts should be documented by the State.

There have been many reported instances from the State agencies to the FNS Regional Offices, that program operators are attempting to obtain the required UEI but have been unsuccessful due to no fault of their own. If FNS were presented with a situation where a State agency continued to make program reimbursement payments to a Program operator who is actively attempting to come into compliance in obtaining their UEI and can provide the State agency with supporting documentation as such, FNS would expect that no action be taken against neither the State agency nor the Program operator. In instances where the Program operator is uncooperative, unresponsive, and/or is unable to provide the State agency with documentation to support their efforts in obtaining the UEI, it may become appropriate for the State agency to suspend program payments until a time when compliance is gained. In such situations, the State should confer with their Regional Office prior to suspending payment.