

The requirement for institutions to have a DUNS number in order to receive federal funds is changing. To receive federal funds as a grant recipient, a library/system must register in the federal System for Award Management (SAM) at SAM.gov and obtain a new, non-proprietary Unique Entity Identifier (UEI) by April 4, 2022.

Examples of federal funds your library may receive include Library Services and Technology Act (LSTA); Coronavirus Aid, Relief, and Economic Security Act (CARES Act); American Rescue Plan Act of 2021 (ARPA); grants from the Institute of Museum and Library Services (IMLS) including Native American Library Services Basic and Enhancement grants; grants from the National Endowments for the Humanities and the Arts; and grants from the North Carolina Humanities Council.

Background

The Office of Management and Budget (OMB) revised the Uniform Guidance for grants (2 C.F.R. part 200) on August 13, 2020. This was the first major updating of the Uniform Guidance since 2014. The relevant requirement that describes the transition away from using DUNS numbers (from Dun & Bradstreet) as entity identifiers to [Unique Entity Identifier](#) (UEI) (from Ernst & Young through SAM.gov) is in [2 CFR § 25.300](#) Requirement for recipients to ensure subrecipients have a unique entity identifier:

(a) A recipient [The State Library of North Carolina] may not make a subaward to a subrecipient [eligible North Carolina libraries] unless that subrecipient has obtained and provided to the recipient a unique entity identifier [formerly DUNS which is now transitioning to a new UEI number]. Subrecipients are not required to complete full SAM registration to obtain a unique entity identifier.

(b) A recipient must notify any potential subrecipients that the recipient cannot make a subaward unless the subrecipient has obtained a unique entity identifier as described in paragraph (a) of this section.

The transition from DUNS to UEI was originally slated for December 2020 but was adjusted to allow additional time for the federal government, grantees, and subrecipients to prepare for the transition. Detailed information regarding the transition is available in the *Unique Entity Identifier Update* from the [U.S. General Services Administration](#).

What does this mean for my library?

For a library to be eligible to apply for and be awarded federal funds after April 4, 2022, your library (including local government and institution units acting as a fiscal agent) will need to obtain a UEI. If your library's county/municipality (inclusive of cities, villages, towns) or institution holds the DUNS number for

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your library, please contact your county/municipality to ensure they've completed the DUNS to UEI transition.

1. If your library already has a DUNS number **AND** is registered in SAM.gov, that DUNS number will be automatically updated to a UEI. This scenario is most likely for libraries using a municipal/county/institutional DUNS number and libraries that have received direct federal assistance through a grant from IMLS or another federal agency. Use the [SAM Status Tracker](#) to check your organization's registration status with SAM.
2. If your library already has a DUNS number but is not registered in SAM.gov, you will need to complete SAM.gov registration in order to have your DUNS number transitioned to a UEI. This scenario is likely for libraries that hold their own DUNS numbers and have not applied directly to a federal agency for a grant. Use the [SAM Status Tracker](#) to check your organization's registration status with SAM. Starting in October 2021, you'll be able to request a new UEI-only in SAM.gov; full SAM.gov registration will not be required if you only need a UEI.
3. If your library has neither a DUNS number nor is registered in SAM.gov, you will want to decide whether you will proceed with SAM.gov registration in order to obtain a Unique Entity Identifier. The State Library of North Carolina believes it is important for libraries to be able to apply for and receive federal assistance, particularly considering the volume of federal financial assistance that has been provided since March 2020. Having the ability to be flexible and request federal assistance can provide substantial financial assistance in improving library services in your community. The process to register on SAM.gov will vary depending on when you register:
 - a. Prior to April 4, 2022, you will continue going to D&B to get a DUNS number to register your entity in SAM.gov. You will be assigned a Unique Entity ID (SAM) as a part of the SAM.gov registration process.
 - b. On or after April 4, 2022, you will be assigned a Unique Entity ID (SAM) as part of the SAM.gov registration process. You will no longer need a DUNS number for registration.

Between now and April 4, 2022, libraries and systems may be awarded federal grant funds using a DUNS number. After April 4, 2022, libraries and systems must have a UEI to apply for and receive federal grant funds. While applications for the State Library's FY2022-2023 LSTA grant program will be submitted before this transition date, your library will be required to provide the UEI before any funds may be awarded in June 2022.



Image Credit: Grants.gov's Timeline for Organization DUNS and UEI

How long does it take to register with SAM?

(From Grants.gov) Generally, after completing the online registration and sending your notarized letter confirming the entity administrator, it takes up to two weeks to register with SAM, then 1 business day for updates made in SAM to be reflected in Grants.gov. However, your organization must first have an EIN. If your organization does not have an EIN, you should allow an additional 5 weeks to request and obtain an EIN from the [IRS](#).

What do I do once I've registered with SAM.gov and obtained a UEI?

Currently, DUNS numbers are reported to the Department of Natural and Culture Resources in the NC Substitute W-9 form. Once you've received your UEI, it is possible that the Department may request that information in an updated Substitute W-9. The number may also be required on any forms used to request federal grant funds from the State Library of North Carolina or any other entity offering grants.

Important links

- [Check your Registration Status](#) on SAM.gov
- [Register your Entity](#) on SAM.gov
- [Search and Request DUNS](#)

Questions

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