

**FISH AND WILDLIFE SERVICE
FEDERAL FINANCIAL ASSISTANCE**

Federal Financial Assistance Part 516 FWS Financial Assistance – Award Administration

Chapter 5 DUNS and SAM Registration Requirements

516 FW 5

5.1 What is the purpose of this chapter? This chapter provides the information employees working with grant and cooperative agreement awards need to:

- A.** Monitor recipients for compliance with the Data Universal Numbering System (DUNS) and System for Award Management (SAM) registration requirements, and
- B.** Implement the Department of the Interior’s Guidance Release 2012-08: *DUNS and Central Contracting Registration (CCR) Requirements for Grants and Cooperative Agreements*.

5.2 What are the objectives of this chapter? Our objectives are to:

- A.** Ensure employees working with grants and cooperative agreements are aware of the DUNS and SAM registration requirements and of their responsibilities to communicate the requirements to applicants and recipients,
- B.** Establish and implement a process for waiving the DUNS and SAM registration requirements for qualified entities, and
- C.** Implement centralized Servicewide monitoring to ensure grant and cooperative agreement award recipients maintain active SAM registrations.

5.3 What is the scope of this chapter? This chapter:

- A.** Covers all programs that administer and manage grant and cooperative agreement awards, but
- B.** Does not apply to any individual applying for or receiving Federal funds under a grant or cooperative agreement award separate from a business or non-profit organization he/she may operate. The Office of Management and Budget (OMB) exempts these individuals from the DUNS and SAM registration requirements.

5.4 What are the authorities for this chapter?

- A.** Pre-Award Responsibilities, Universal Identifier and Central Contractor Registration ([2 CFR Part 25](#)).
- B.** [U.S. Department of the Interior Guidance Release 2012-08: DUNS and CCR Requirements for Grants and Cooperative Agreements](#).

5.5 Who is responsible for ensuring recipient compliance with the DUNS and SAM registration requirements? See Table 5-1.

Table 5-1: Responsibilities for Ensuring Recipient Compliance with the DUNS and SAM Registration Requirements	
These employees . . .	Are responsible for . . .
A. The Director	Making sure the Service has policy in place for programs that administer grant and cooperative agreement awards to ensure recipient compliance with the DUNS and SAM registration requirements.
B. The Assistant Director – Wildlife and Sport Fish Restoration Program (AD - WSFR), through the Division of Administration and Information Management, Branch of Financial	(1) Developing policy on the DUNS and SAM registration requirements, and (2) Overseeing Service implementation of the policy.

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Table 5-1: Responsibilities for Ensuring Recipient Compliance with the DUNS and SAM Registration Requirements	
These employees . . .	Are responsible for . . .
Assistance Policy and Oversight (FAPO) and Financial Assistance Systems	
C. Directorate members in Headquarters and the Regions	Making sure employees who issue, administer, and manage grant and cooperative agreement awards are aware of and follow the requirements in this policy.

5.6 What is DUNS and its registration requirement?

A. DUNS is a system developed and regulated by Dun & Bradstreet (D&B) that assigns a unique nine-digit number, referred to as a "DUNS number," for each of an entity's physical locations. The number is associated with key business information, such as name and address.

B. Regulations require entities that either apply for or receive Federal funds under grant and cooperative agreement awards, or receive subawards directly from entities that receive grant and cooperative agreement awards, to obtain a valid DUNS number, unless the entity is exempt (see [section 5.3B](#)) or the Service waives the requirement (see [section 5.8](#)).

C. Entities that have to register to get Federal contracts, grants, and cooperative agreement awards can get a DUNS number for free. Information about how to obtain a DUNS number is available on the [company's Web site](#).

5.7 What is SAM and its registration requirement?

A. SAM is a Federal procurement and financial assistance [Web site](#) that consolidates the functionality that was previously in such systems as the CCR, Federal Agency Registration (Fedreg), the Online Representations and Certifications Application (ORCA), and the Excluded Parties List System (EPLS).

B. Regulations require entities that apply for or receive Federal funds under grant and cooperative agreement awards to register and maintain current information in [SAM](#) unless the entity is exempt (see [section 5.3B](#)) or the Service waives the requirement (see [section 5.8](#)).

C. To maintain an active registration in SAM, recipients must review and update their SAM information at least annually after the initial registration, and more frequently when information changes.

5.8 May the Service waive the DUNS and SAM registration requirements for an entity?

A. Yes, but because we need to ensure transparency of Federal funding, we may only approve a waiver if one of the following criteria is met:

(1) We must protect information about the entity from disclosure to avoid compromising classified information or national security or jeopardizing the personal safety of the entity's clients, or

(2) A foreign entity is applying for or receiving an award for less than \$25,000, the project will be conducted outside of the United States, and we find it impractical for the entity to comply with the requirement (see [section 5.10](#) for information about what has to happen if the award reaches \$25,000 or more).

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B. If one of the criteria above is met:

- (1) We can waive the requirement for both the DUNS and SAM registration, or
- (2) If the recipient has a DUNS number but cannot register in SAM, we can waive just the SAM registration requirement.

5.9 What is the process to request a waiver?

A. To request a waiver, the program must:

- (1) Obtain from the entity a written justification supporting the criterion/criteria (see [section 5.8A](#)).
- (2) Complete [FWS Form 3-2451](#), *Financial Assistance Recipient DUNS/SAM Registration Waiver*. The managing Directorate member must sign and date the waiver request form. Someone “Acting” for him/her may sign the form in his/her absence, but the signature cannot be delegated below the “Acting” level.
- (3) Route the written justification and completed waiver request form in the Data Tracking System (DTS) to the AD-WSFR.

B. The AD-WSFR will send the request to the Branch Chief, FAPO. FAPO staff will:

- (1) Recommend to the AD-WSFR whether or not to approve the waiver request based on the criteria in [section 5.8A](#), and
- (2) Maintain a list of all approved and denied waivers.

C. The AD-WSFR or his/her Acting must approve or deny the waiver request by signing and dating the waiver form.

D. After the program receives the waiver decision from the AD-WSFR, program staff must:

- (1) Maintain the form in the official award file, and
- (2) Send the entity a copy of the form.

5.10. What happens if a foreign entity receives a waiver, but the total Federal award amount is later increased to \$25,000 or more? Once the cumulative total Federal award amount becomes equal to or greater than \$25,000, the waiver is automatically revoked, and the foreign entity must register in SAM. To ensure compliance with the funding limit, FAPO monitors all financial assistance awards to foreign recipients with waivers to ensure they do not reach or exceed the \$25,000 limit.

A. When such an award equals or exceeds the \$25,000 limit, FAPO must:

- (1) Notify the Grants Specialist or other managing officer that the recipient’s waiver is revoked and that the recipient needs to register in SAM to continue receiving payments,
- (2) In coordination with any other impacted Departmental bureau(s), request that the Financial and Business Management System (FBMS) Vendor Master Data Maintenance team place a payment block on the recipient’s vendor record in FBMS, and
- (3) After the recipient registers in SAM, work with the FBMS Vendor Master Data Maintenance team to make necessary updates to the recipient’s FBMS vendor record and remove the payment blocks.

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B. The program that initiated the waiver request must:

(1) Communicate with the recipient until their SAM registration is complete, and

(2) After the recipient registers in SAM, notify FAPO that the registration is complete and provide the recipient's DUNS number if the recipient was not previously registered in DUNS.

5.11 What must Service programs do to ensure applicant and recipient compliance with the DUNS and SAM registration requirements? We must:

A. Include the DUNS and SAM registration requirements in the full *Notice of Funding Availability and Application Instructions* document that is attached to the Grants.gov synopsis when we post a funding opportunity on Grants.gov,

B. Include reference to the [2 CFR Part 25, Appendix A](#) award term in every grant and cooperative agreement award notice,

C. Unless the entity is exempt or receives a waiver (see [sections 5.3B](#) and [5.8](#)), and before obligating funds for a new award:

(1) Confirm that the entity has an active registration in SAM. Search for the entity in SAM (typically by searching by the DUNS number the entity puts on their application),

(2) Make sure that the DUNS number associated with the entity's active SAM registration matches the DUNS number on the FBMS vendor record for the award, and

(3) Include the following statement in every notice of award:

Under the terms and conditions of this award, your organization must maintain an active SAM registration until the final financial report is submitted or final payment is received, whichever is later. If your organization's SAM registration expires during the required period, the U.S. Fish & Wildlife Service will suspend payment under this and all other Service awards to your organization until you update your organization's SAM registration.

D. Before releasing an award revision, confirm that the recipient's SAM registration is still active. We must not provide additional funding or extend an award period of performance to a recipient with an inactive SAM registration.

E. Monitor SAM registration expiration dates and remind recipients with upcoming expiration dates of their responsibility to maintain an active SAM registration. We can use the FBMS Enterprise Management Information System (EMIS) reporting to monitor SAM registration expiration dates.

F. FAPO staff may test for compliance with the SAM registration requirements. If FAPO detects an expired SAM registration, they will notify the affected Grants Specialist(s) or other managing officer that the recipient is out of compliance.

5.12 What happens when a recipient's SAM registration expires? FBMS automatically places blocks that prevent the obligation of new funds to the recipient and the release of payments requested through the Interior Business Center (IBC).

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5.15 May the Service reinstate a terminated award? No. Once we terminate an award, we may not reinstate it.

5.16 If, during a period of suspension or termination, a recipient incurs costs authorized under an award, are the costs allowable and eligible for reimbursement? We may reimburse the recipient for allowable and eligible costs during a suspension or termination, but only if:

- A.** The costs cannot be reasonably avoided;
- B.** The costs were from obligations the recipient made before the suspension or termination action and not in anticipation of either action. For terminations, the costs must be the type that the recipient could not cancel;
- C.** The costs would have been allowable if the award were not suspended or terminated; and
- D.** We notify the recipient (with appropriate return receipt) through mail, fax, or email that we authorize reimbursement of the costs.

/sgd/ Stephen Guertin
DEPUTY DIRECTOR

Date: September 30, 2013