



Management Directive

Commonwealth of Pennsylvania

Governor's Office

Management Directive 310.34 Amended – Use of Agency-Level Unique Entity Identifiers (UEI) in Applications for Federal Grants and Cooperative Agreements

Date: February 9, 2022
By Direction of: *Greg Thall*
Greg Thall, Secretary of the Budget

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This directive establishes policy, responsibilities, and procedures for the management of Agency-Level Unique Entity Identifiers (UEIs) and their use in applications for federal grants and cooperative agreements. This amendment replaces the Data Universal Numbering System (DUNS) number information with UEI information due to changes at the federal level. Associated changes have been made throughout each section and the Enclosure has been deleted.

1. PURPOSE.

This directive establishes policy, responsibilities, and procedures for the management and use of Agency-Level UEIs in applications for federal grants and cooperative agreements.

2. SCOPE.

This directive applies to all departments, offices, boards, commissions, and councils under the Governor's jurisdiction and to those independent agencies that use the SAP enterprise resource planning system (hereinafter referred to as "SAP") as their financial accounting system (hereinafter referred to as "agencies."). Independent agencies not using SAP should adopt similar policy, responsibilities, and procedures.

3. OBJECTIVES.

- a. To ensure compliance with the U.S. Office of Management and Budget (OMB) policy statement, [Guidance for Grants and Agreements](#).

- b. To ensure agencies use Agency-Level UEIs when submitting applications for federal grants and cooperative agreements.
- c. To ensure agencies manage Agency-Level UEIs and provide information as requested.

4. DEFINITIONS.

- a. **Agency-Level UEI.** The UEI assigned to each agency and maintained by the UEI Coordinator.
- b. **[Grants.gov](https://www.grants.gov).** An online system managed by the U.S. Department of Health and Human Services, which serves as both a central repository for information on federal grant programs and a mechanism by which organizations can search and apply for federal grants.
- c. **[Guidance for Grants and Agreements](#).** The OMB policy statement that requires applicants to include UEIs on new or renewal applications for federal grants or cooperative agreements, including applications or plans under mandatory grant programs, submitted on or after April 4, 2022.
- d. **System for Award Management (SAM).** The primary registrant database for the federal government, which collects, stores, and disseminates data in support of federal agency contracts, grants, cooperative agreements, and other forms of federal assistance.
- e. **[SAM.gov](https://sam.gov).** An online system for registering with and updating SAM, and wherein registrants are assigned UEIs and UEIs are maintained.
- f. **UEI Coordinator.** An individual designated by an agency who is responsible for all activity related to the Agency-Level UEI, including serving as the primary Point of Contact/System Account Administrator for SAM.
- g. **Unique Entity Identifier (UEI).** A required, unique, 12-character, alphanumeric identifier assigned to all entities that conduct business with the federal government.

5. POLICY.

- a. All applications for federal grants and cooperative agreements (including paper applications and applications submitted through [Grants.gov](https://www.grants.gov)) must include a UEI, in accordance with the OMB policy statement [Guidance for Grants and Agreements](#). Applications that do not include a UEI will be considered incomplete and will be rejected by the respective federal agency.
- b. All agencies doing business with the federal government must be registered in SAM and designate the registration viewable by the public.
- c. Each agency must designate a primary UEI Coordinator with the authority to manage the agency's information in SAM and the Agency-Level UEIs. Agencies should also designate at least one alternate UEI Coordinator. Both individuals shall be designated as Points of Contact/System Account Administrators in SAM.
- d. Agency-Level UEIs must be obtained and managed through the UEI Coordinator.

- e. Agencies shall make every effort to utilize and maintain a single Agency-Level UEI for use on all applications for federal grants and cooperative agreements. If an agency has more than one UEI or determines there is a need for more than one UEI:
 - (1) Each agency through the UEI Coordinator is responsible to determine the appropriate Agency-Level UEI to use.

Exception: An agency shall use a designated UEI for a federal grant or cooperative agreement if indicated by the federal cognizant agency.
 - (2) Each agency through the UEI Coordinator is responsible to determine the need for a new UEI and obtain one.
- f. UEIs do not replace other numbers, such as the Employer Identification Number, Tax Identification Number, or State Application Identifier numbers that are required by statute, executive order, regulation, or policy.

6. RESPONSIBILITIES.

a. Agency heads shall:

- (1) Ensure agency policies and procedures for establishing, using, and managing Agency-Level UEIs are developed in accordance with this directive and SAM.
- (2) Designate a primary and at least one alternate UEI Coordinator.

b. UEI Coordinators shall:

- (1) Ensure a single Agency-Level UEI is used on all applications for a federal grant or cooperative agreement to the extent possible in accordance with this directive.
- (2) Manage the agency's SAM registration and account.
- (3) Ensure that, if the agency has more than one UEI, the appropriate Agency-Level UEI is used, especially if a specific UEI was designated by the federal cognizant agency.
- (4) Determine the need for any new Agency-Level UEIs and ensure they are associated with a full entity SAM.gov registration.
- (5) Ensure Agency-Level UEIs are communicated to applicable agency personnel.
- (6) Record and report to BAFM requested Agency-Level UEIs.

c. Agencies shall:

- (1) Adhere to this directive regarding Agency-Level UEIs.
- (2) Include the Agency-Level UEI in all applications for federal grants and cooperative agreements.
- (3) Review applications for federal grants and cooperative agreements to ensure consistent use of the Agency-Level UEI.

- (4) Contact the UEI Coordinator for questions about the Agency-Level UEI or SAM.

d. BAFM shall:

- (1) Provide support to agencies and UEI Coordinators to resolve disputes or questions regarding the use of Agency-Level UEIs.
- (2) Request Agency-Level UEIs from UEI Coordinators as needed.

7. PROCEDURE.

a. Agency Heads.

- (1) Direct and ensure the development of agency policies and procedures for establishing, using, and managing Agency-Level UEIs in accordance with this directive and SAM.
- (2) Designate a primary and at least one alternate UEI Coordinator with the authority to manage SAM and designate Agency-Level UEIs on behalf of the agency.

b. UEI Coordinator.

- (1) Manage SAM for the agency, including, but not limited to:
 - (a) Establishing and maintaining accurate and full entity registration for the agency.
 - (b) Ensuring the registration is viewable to the public.
 - (c) Reviewing and updating agency information in SAM on at least a quarterly basis.
- (2) Compare UEIs listed on an agency's application for a federal grant or cooperative agreement to the Agency-Level UEI(s) and SAM.gov:
 - (a) If the application UEI matches, instruct agency staff to use.
 - (b) If the application UEI does not match or is missing, work with agency staff to resolve.
 - (c) If the application warrants a new UEI, work with agency staff to obtain.
- (3) Provide a list of Agency-Level UEI(s) to BAFM as requested.

c. Agency.

- (1) In accordance with this directive, use the appropriate Agency-Level UEI on applications for federal grants or cooperative agreements.
- (2) Contact the UEI Coordinator for questions regarding Agency-Level UEIs or SAM.

d. BAFM.

- (1)** Work with agencies and UEI Coordinators to resolve disputes or questions regarding the use of UEIs.
- (2)** Request Agency-Level UEIs from UEI Coordinators as needed.

This directive replaces, in its entirety, *Management Directive 310.34 Amended*, dated December 18, 2019.