



IDENTIFICATION NUMBERS NEEDED TO APPLY FOR FEDERAL FUNDS

The requirement for grant applicants, including libraries, to have a DUNS number to receive federal funds is changing. To receive federal funds as a grant recipient, a library 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 of 2022. **This applies for any new applications submitted to the Library of Michigan and for current grantees to continue to receive grant funds from the Library of Michigan.**

Examples of federal funds your library may receive include Library Services and Technology Act (LSTA) grants such as the Library of Michigan (LM) Public Library Services grant program, the LM Improving Access to Information grant program, the American Rescue Plan Act of 2021 (ARPA) grants, LM continuing education stipends, direct grants from the Institute of Museum and Library Services (IMLS), etc.

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 Identifiers](#) (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 [Michigan Department of Education/Library of Michigan] may not make a subaward to a subrecipient [public libraries and public library systems] 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.

What does this mean for my library?

For a library to be eligible to apply for and access federal funds after April of 2022, your library (or local government unit acting as a fiscal agent) will need to obtain a UEI. If your library's county/municipality (inclusive of cities, villages, towns, tribal governments and tribal associations, and school districts that operate a public library) holds the DUNS number for your library, please contact your municipality/county to ensure they've completed the DUNS to UEI transition and get the new UEI number.

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 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 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. Refer to the "[New to SAM.gov for Financial Assistance](#)" PDF from the U.S. General Services Administration for details on how to register for a SAM.gov account and maintain that registration.

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 to obtain a Unique Entity Identifier. The Library of Michigan believes it is important for libraries and/or their local government unit 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. Refer to the "[New to SAM.gov for Financial Assistance](#)" PDF from the U.S. General Services Administration for details on how to register for a SAM.gov account and maintain that registration.

Between now and April of 2022, libraries may access federal grant funds using either a DUNS number or a UEI. After April of 2022, libraries and systems must have a UEI to apply for and receive federal grant funds. Since the 2022 Library of Michigan grant applications are for grant funding that will be disbursed after April 2022, all new applications must be submitted with a UEI number.

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 one 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](#).

Summary

- DUNS numbers are transitioning to Unique Entity Identifiers (UEI).
- Libraries will need the new UEI to receive federal funds (e.g., LSTA) after April of 2022.
- Until April of 2022, libraries can still utilize their DUNS numbers to satisfy the UEI requirement to access federal funds.
- The UEI can be obtained by [registering in SAM.gov for financial assistance](#).
- If your library uses a municipal/county DUNS number to access federal funds, contact your municipality/county to ensure you are registered in SAM.gov.
- If your library uses its own DUNS number to access federal funds or does not have a DUNS number, you should obtain a DUNS number and register in SAM.gov to obtain a UEI.
- You may need to confirm your entity administrator by sending a notarized letter.

Additional Resources

- [Entity Registration Walkthrough](#)
- [Reference Guide for Grant recipients](#)
- [Federal Service Desk](#) – SAM.gov Help Desk