Unique Entity ID Q&A

These questions were received at the public meeting held on July 25, 2019. Answers are below. Further inquiries may be directed to entityvalidation@gsa.gov. Press inquiries should be sent to press@gsa.gov.

Question	Answer
Will GSA IAE systems treat the UEI data element in the exact same way they use the DUNS today when interfacing with Agency systems such as Financial Systems and Contract Writing Systems?	The UEI data element will be used similarly to how the DUNS number is today for interfacing system actions.
I am a little perplexed about the new process. Currently the Federal government already issues a unique identification number, which is called the Employer Identification Number (EIN). This number is used throughout the U.S. for multiple purposes. Why does one section of the Federal government not use an established system and number? This appears to be a duplication of effort and needless expense for all? Why can't we use the EIN as the Unique Entity Identifier?	Privacy considerations preclude the Taxpayer Identification Number (TIN) -- whether it is an Employer Identification Number (EIN), or in limited circumstances, the Social Security Number (SSN) -- from being used as the public facing unique entity identifier. Further, only entities which are located in the U.S. and its outlying areas, or pay U.S. taxes, have a TIN.
Yes or no. Will the change from DUNS to UEI impact how OCONUS (such as Japan) uses the DUNS to vet contractors prior to allowing them to work OCONUS such as Japan?	All IAE systems will transition from the DUNS number to using the SAM-generated UEI. For purposes of U.S. government awards, to both domestic and foreign entities, the UEI will become the primary, public-facing entity identifier. If other countries use the DUNS number for other purposes, that is outside the scope of the UEI implementation.
Will all offices of an entity still require a UEI for the SF330 Part IIs?	All forms that utilize the DUNS should be reviewed by the form owner for needed updates with the introduction of the new SAM-generated UEI.
What if an organization has multiple DUNS numbers?	Any entity which currently has a DUNS number will be assigned a new UEI in SAM. Organizations with

	multiple DUNS registered in SAM will obtain a UEI for each unique entity.
What purpose will the DUNS number serve in the future?	The DUNS number will be retained, associated to the existing entity registration record, for historical purposes. However, after December 2020, new registrants will no longer need to obtain a DUNS number to register in SAM or use IAE systems.
What about foreign entities that are not required to register in SAM. Some partners may not want to "register" with the USG as they may be labeled as a foreign agent and could be at risk from authoritarian regimes?	Requirements for entities required to register in SAM are not changing with the transition to the UEI from the DUNS. There will continue to be generic entity identifiers for the categories of entities outlined in FAR Subpart 4.605(c)(2).
Since we are already registered in SAM.gov, we need to do nothing to receive a UEI since it will be assigned automatically, correct?	UEIs will automatically be assigned to existing entities in SAM and made available for viewing in SAM.
As an existing entity, will we be notified of our automatically-assigned UEI?	A notification process will be established so that entities can find their assigned UEI.
Will there be a SAM Entity Management Sensitive Extract V3 Layout and Extract with UEI as the first part of the key? Will there be a period where both V2 and V3 extracts are supported?	SAM entity management extracts will be updated to include the UEIs. We anticipate a transition period where both versions of the extract are supported to allow for extract users to migrate.
Are foreign countries who currently use DUNS to vet government contractors being engaged in this effort to inform them they must use sam.gov to vet contractors vice their currently using DUNS? For instance, in Japan, by law, the local legal bureau ("Tokibo" in Japanese language) requires D&B agency in Japan, called TSR (TOkyo Shoko Research) to screen US government contractor registration. Will the UEI impact this?	The U.S. Government transition from using the DUNS number to using the SAM-generated UEI as the required unique entity identifier does not impact the purposes for which other countries may or may not use the DUNS number or other D&B (or D&B affiliate) services. Entities registering to do business with the U.S. Government will not have a DUNS number assigned as part of the registration process after December 2020.
Will the many systems used by individual agencies (e.g. NSPIRES for	Interfacing systems that use SAM and IAE data related to the DUNS/UEI should plan on making

NASA, Research.gov for NSF) be ready for this change? In other words, are individual agencies already planning on making the required updates/upgrades to their systems? that now are often based on use of DUNS# ?	system updates. For any individual system questions, GSA recommends reaching out to the respective system owner.
When including alphabetic characters in the UEI, will those alphabetic characters be stored / displayed as capital letters or lower-case letters? For example, A, B, C or a, b, c?	Capital letters will be used in the UEI.
Will the UEI be required on acknowledgements and invoices after the transition?	Individual changes may be necessary to forms and documentation. The process or document owner will make that determination.
How does this impact large businesses with multiple DUNS#	Large businesses with multiple DUNS will receive a UEI for each unique entity in SAM.
If we are assigned a UEI prior to December 2020, should we start using it as soon as it is assigned on proposals etc?	No, there will be further instructions on when the UEI should be used for proposals and other award actions.
will the actual cutover date be in december 2020?	There is going to be a lengthy transition period during which IAE will provide specific transition activities and cutover dates. By December 2020, the SAM-generated UEI will be the authoritative unique entity identifier in SAM.
Can you confirm - will the GSA automatically assign the new UEI or does the vendor have to take action to register? Thank you	Existing registrants will be automatically assigned a new UEI. New registrants will be assigned a UEI as part of their SAM registration.
Will the UEI be a 1 to 1 relationship to an entity's EIN, or as the slide says, will component units of a University be able to request a separate one based on address?	Like you can do with a DUNS number today, component units of a University can request separate UEIs when registering in SAM based on address or other measures of organizational uniqueness. EINs will continue to be assigned by the Internal Revenue Service as appropriate for tax purposes.
Sounds like no action is required by entities already registered in sam.gov. Is	Entities already registered in SAM will automatically receive a new UEI. However, entities may need to

this correct?	take action to start using the new UEI where they are currently using the DUNS.
For entities that receive a subgrant from a recipient of a federal award, will they be required to obtain a unique identifier from SAM.gov?	Yes. Sub-awardees will need to obtain a UEI to adhere to regulations. Instead of going to D&B for a DUNS number like they do today, the sub-awardee would go to SAM.gov to request a UEI. They will not be required to complete the full entity registration process.
How much of a lift will it be for transition. Do we need to make contract modifications where we have our old DUNS #s listed once the change has been made	The transition lift will likely vary. Agencies will convey process requirements to their workforce as we get closer to the transition.
Will it be possible for entities to have multiple UEIs? For example, will big corporations have several dozen UEIs?	Yes, large organizations may have multiple UEIs, similarly to having multiple DUNS today.
Can you please explain how subrecipients who aren't registered in SAM will receive a unique identifier?	There will be a process to request a unique entity identifier in SAM which doesn't require full SAM entity registration.
If we are renewing our registration in SAM, we do not have to do this again when the new UEI system is fully implemented - correct?	You should renew your registration to maintain your active status. You will not need to re-register in SAM to be assigned a new Unique Entity Identifier.
Will state & local agencies also be moving to this new UEI or will we have to reference both the DUNS and UEI on future billing document headers?	State and local agencies will need to decide how they want to leverage the UEI once the DUNS is no longer used in SAM.
What happens to the existing records with DUNS#	The DUNS number will be retained on the record for historical purposes, but will no longer be a primary identifier. Entities who register after December 2020, will not have a DUNS number associated with their SAM record.
Do you know how the process will go for active CAGE Codes? Will it be in order of size of contracts? Alphabetical? Numeric? Size of business?	CAGE codes that are associated to a SAM.gov entity registration will be assigned a Unique Entity Identifier. CAGE codes that are active at CAGE, but not registered in SAM, will not be assigned a UEI.

Which government organization will review the SF grants application forms to include the UEI? Will it be OMB OFFM, OIRA, or GSA?	GSA recommends contacting OMB's Office of Federal Financial Management for guidance.
Is a unique entity considered a regional office?	A unique entity is an entity or part of an entity whose identifying information does not match that of any other entity doing business with the federal government.
Is there a mandate for when Department's grant management systems need to be updated to account for the new identifier? In light of the longer number our developers will have to rework several areas in our grants management system order to accommodate the new identifier. Thanks and looking forward to the Q/A at gsa.gov!	Grant management system owners will need to determine their schedule for migrating to the new UEI.
Will each +4 require a unique SAMMI or is there a +4 equivalent for the SAMMI?	The FAR updated the terminology from DUNS+4 to Electronic Funds Transfer (EFT) Indicator in 2016. Those SAM registrations with multiple financial accounts, i.e. multiple DUNS+4 values, will obtain a new UEI for their DUNS and retain the additional 4-character EFT Indicators they selected for each separate financial account associated with the entity registration.
How will we receive new UEI numbers?	New UEIs will be assigned in SAM where entity users will be able to view them.
Will there be a hierarchy of UEI like there is for DUNS that relates "child" entities to their "parent" entities?	Yes, a hierarchy of entities will continue to exist within SAM.
How will we be able to look up the UEIs of other orgs for reporting of subcontractor related information?	Users will be able to search for entities to find their UEI similar to how entities can be searched for today in SAM.
What is the impact on the submission of grant applications?	Entities required to register in SAM, including those registering for Federal Assistance only, will be assigned a UEI. After December 2020, new entities registration will not have a DUNS number associated

	with their record. Grant-making agencies need to plan for the transition.
Will the UEI have hierarchy within a corporation? eg. multiple locations, sub-divisions...	Yes, a hierarchy of entities will continue to exist within SAM.
I saw that the DUNS will be retained, but is it expected that both need to be used for some period - meaning will the cutover be phased?	The UEI will be available prior to the cutover, but the DUNS number remains the authoritative unique entity identifier for doing business with the U.S. Government until the official UEI cutover.
Can an entity request their UEI at any time or do they have to wait until they renew their SAM's registration?	UEIs will automatically be assigned to entities currently registered in SAM during the transition. There will not be a separate request process.
For historical records that used DUNS will that be accessible with a DUNS search? Or can the new UEI be used as well?	The DUNS number tied to historical records will remain a field against which you can search. For those records which have both an assigned DUNS number and a new SAM-generated UEI, you will be able to search for the record by either identifier.
Will this affect federal payments systems where we perform federal drawdowns? Most of those use our DUNS to assign accounts or link our awards in their payment systems.	This change will most likely affect the federal payment systems. Please be in touch with those system owners about how any change will be implemented.
Will searches for EXCLUSIONS by DUNS still be possible	Yes. The DUNS number tied to historical records will remain a field against which you can search. For those records which have both an assigned DUNS number and a new SAM-generated UEI, you will be able to search for the record by either identifier. This includes exclusion records.
Is there is anything we have to do on the SAM webpage to get our new number or will it automatically happen? For example, my next SAM renewal is in January 2020, will they just tell me then? Or is there paperwork involved?	Existing registrants will have their UEI automatically assigned. SAM will notify entity administrators of the UEI assignment.
So for those with an existing SAM registration will be assigned a new	UEI assignments will occur before December 2020.

unique identifier sometime after Dec 2020?	
Is there helpful information for DOD agency officials (policy) who are working to implement this change over the next 18 months.	GSA is working with agencies during the transition. However, agencies will develop their own policy and implementation guidance. Contact the appropriate policy officials in your agency.
Is there a way to link UEIs (for instance, for a school system)	Yes, a hierarchy of entities will continue to exist within SAM.
What kind of reference data elements / underlying data will be captured for each of the UEIs? Will it just be entity name and address?	When requesting a Unique Entity Identifier, the entity will provide basic data (e.g. legal entity name, doing business as name, physical address) which will be used to validate uniqueness. During the full SAM entity registration process, the entity will provide the same comprehensive data set they do today.
Will you be posting this Q&A on the same site as the recording?	Yes, the Q&A's will be posted on gsa.gov/entityid.
Has the UEI been coordinated with the Single Audit (SA) process and the Federal Audit Clearinghouse. For example the SA Act allows flexibility in determining the audited entity. The audited entity may include multiple DUNS and EIN entities or multiple audit entities may use the DUNS or EIN number. A way is needed to identify how UEI track to the siSingle audit entity.	For the purposes of the Single Audit (SA) process, there is a one-to-one relationship between the new SAM-generated Unique Entity Identifier (UEI) and the historical DUNS number assigned to the entity. Going forward, the UEI will identify the entity registered in SAM, like the DUNS number does today. There can be a many-to-one relationship for UEI-to-EIN, as there is today with multiple locations of an entity each assigned a DUNS number and sharing the same EIN.
Will FSRS continue to use DUNS numbers for subcontractor reporting?	No. FSRS will migrate to using UEIs for sub-awardee reporting.
In regards to forms the SF424 used for grants.gov applications will also be updated to use the UEI?	Individual changes to forms related to the DUNS/UEI transition will need to be addressed to the form's agency owner.
Just to confirm for non U.S. entities, the NCAGE will still be required, correct?	Correct. Entities not located in the U.S. and its outlying areas will continue to first obtain an NCAGE before registering in SAM to do business with the federal government.
The DUNS will be the UEI for entities	The DUNS will continue to be the official identifier for

already registered?	entities registered in SAM until the cutover to the SAM-generated UEI. After the cutover,the primary identifier for entities registering in SAM will be the UEI.New entities registering after the cutover will not have a DUNS number associated with their registration. At cutover, existing entity registrations will maintain their DUNS number for historical purposes only.
Currently subrecipients are NOT required to register in SAM, but are required to have a unique identifier (DUNS). Will subrecipients be required to register in SAM in order to obtain a unique identifier?	Sub-awardees will not be required to complete the entity registration process in SAM in order to be assigned a Unique Entity Identifier (UEI). After the transition to the SAM-generated UEI, sub-awardees will be able to request their UEI from SAM. Prime awardees will use the sub's UEI when reporting in FSRS.
Will the format (character length, alphanumeric, etc.) of UEI be the same as the Existing DUNS, correct?	No. The format will not be the same. Please see the following Federal Register notice for the new unique entity identifier standard: https://www.federalregister.gov/documents/2019/07/10/2019-14665/unique-entity-id-standard-for-awards-management
Clarification regarding a company with several current SAM Registrations using the "same" legal entity name, but with different financial data rollover as well? (Same Corp Name=Legal Entity, with different DUNS Numbers and associated different Financial data)?	In general, each SAM entity registration will be assigned a new Unique Entity Identifier. However, the scenario described (same legal entity name and same physical address, different financial account data) does not meet the definition of uniqueness: just having different financial account information for electronic funds transfer does not make a new unique entity. The entity should just have multiple financial accounts on its main SAM entity registration indicated by different Electronic Funds Transfer (EFT) Indicators.
So until the forms are updated, do we continue to use the DUNS or UEI, regardless of the language on the form?	Follow instructions on the form being used and any guidance provided by the agency.
Contract Writing Systems interface with FPDS-NG: When will UEI revised APIs / Data dictionary changes for data elements be available?	Revised APIs and data dictionaries will be provided during the UEI transition phase.

Will the UEI be available for registering entities immediately or will they have to wait a period (like with obtaining a DUNS today) for the UEI to become active before it can be registered?	UEI assignment times will be dependent on how quickly entity uniqueness and validation can be accomplished. It is the goal to make the UEI response time immediate for a large percentage of UEI assignment requests.
Is it known how new registrations will get into SAM?	New entities registering in SAM will request their Unique Entity Identifier (UEI) in SAM, then continue on with the entity registration process in SAM after the UEI is assigned.
Will the DUNS # change to UEI be the only thing changed in SAM web services that applications use to get data from SAM or are other changes expected?	The primary identifier changing from DUNS to UEI will be the main change in SAM web services, however there may be other associated changes depending on the exact data element.
For entities overseas support, will SAM helpdesk have office hours for such support?	The Federal Service Desk (FSD at www.fsd.gov) will be available to address questions on the change to the UEI. The FSD will retain their current hours. Webforms are available 24-hrs a day.
Do you have to be active in SAM to get a UEI assigned	No, UEIs will be assigned to both existing entity registrations (active and inactive) and new entities registering.
Will there be new fields for UltimateParentUniqueIdentifier and name	Yes, there will be new fields for the hierarchy-related fields connected to the new Unique Entity Identifier.
Will UEI address entities hierarchy? for example, a department within a hospital, Can UEI represent that in any way?	There will continue to be an entity hierarchy representing organizational structure in SAM. However, the SAM-generated Unique Entity Identifier has no embedded sequencing in the identifier. Reference the Federal Register notice for technical standard: https://www.federalregister.gov/documents/2019/07/10/2019-14665/unique-entity-id-standard-for-awards-management.
Will the results of the forms review for the UEIs be posted in the Federal Register, or will it be posted on gsa.gov/entity?	The form owner will follow the review process appropriate for each form.
Is there a limitation of one UEI per EIN	No. There is not a one-to-one requirement for UEI to

for an agency, or can there be multiple UEIs per 1 EIN in the case of component units	EIN. The UEI will identify the unique entity registered in SAM, like the DUNS number does today. There can be a many-to-one relationship (UEI to EIN), as there is today with multiple locations of an entity each assigned a DUNS number and sharing the same EIN.
How long will that transition period be?	The transition period is now through December 2020.
Will the content of the FOUO export change?	Yes, the FOUO extract will be modified to incorporate the UEI and associated fields.
Will this process be applicable to foreign organizations that are prime and/or subs? If yes, will additional support be provided to foreign organizations?	The requirements for which entities must have a unique entity identifier and which entities must register in SAM to do business with the U.S. Government are the same. This process does not change the requirement.
How do you define an entity is "unique"? what are the criteria used?	A unique entity is an entity or part of an entity whose identifying information does not match that of any other entity doing business with the federal government.
Ref to "each" entity is confusing.....do you mean legal entity or each current SAM Registration?	Each current SAM registration.
Are the questions and answers going to be reposted somewhere also?	Yes, the Q&A's will be posted on gsa.gov/entityid.
Is there a hierarchy relationship between UEI of similar recipients who have multiple UEI's. For example, if John Hopkins has a UEI for university and medical university, will these be linked in any way within UEI format or a parent/child mapping that will be provided?	A hierarchy of entities will continue to exist within SAM that links entities.
Will private agencies also be made aware of the change from the DUNS number to UEI?	GSA has been communicating, and will continue to communicate, changes related to the DUNS/UEI transition.
For example a statewide audit includes many different DUNS numbers. but there is one audit. Will there be a	** This appears to be a continuation of question 52 ** For the purposes of the Single Audit (SA) process,

crosswalk between UEI and the Single Audit entity.	there is a one-to-one relationship between the new SAM-generated Unique Entity Identifier (UEI) and the historical DUNS number assigned to the entity. Going forward, the UEI will identify the entity registered in SAM, like the DUNS number does today. There can be a many-to-one relationship for UEI-to-EIN, as there is today with multiple locations of an entity each assigned a DUNS number and sharing the same EIN.
Will there be a schedule published of when other major shared services will become UEI compliant? For example, grants.gov, IPP, ASAP...	Other government system owners will communicate their own schedule for changes.
For other systems outside of SAM that utilize the DUNS number will those systems migrate in Dec 2020 as well? (eSRS, fSRS, FBO, etc.,)	Other IAE systems that utilize the DUNS number as the primary identifier will migrate to using the UEI as the primary identifier no later than December 2020.
Will individuals required to have a uei to be a sub?	Yes. The requirement to have a unique entity identifier to receive a sub-award is not changing. It the individual is required today to have a DUNS number to be a sub, they will be required to have a SAM-generated UEI in December 2020.
For FSRS.gov reporting, will the PTE entity be required to submit two reports for the subaward reporting period in which the changeover from current to new UEI, or will only one report be required on the new UEI for the combined amount?	Duplicative reporting will not be required. After cutover, the subaward will simply be reported as awarded to the entity by UEI instead of DUNS.
When will be the sensitive file be available for testing?	More information about transition activities will be provided in the near future.
Will the existing entities registered in SAM.gov with DUNS be validated or re-evaluated for uniqueness prior to the UEI being assigned?	No. The entities registered in SAM have already been validated for uniqueness by Dun & Bradstreet.
Has there been any discussion with D&B on how they will be changing their systems/tools/processes to work with the UEI?	D&B is not required to change their systems. The government decoupled the need for a unique entity identifier from the need for entity validation services (EVS) and separately competed EVS. After cutover in

	December 2020, there will be a new service provider.
Will the SF424 need to have fields to support both DUNS and UEI until the DUNS is fully phased out?	The use of DUNS and UEI in various forms will be determined by the form owner.
Are you working with major financial system vendors (Oracle, SAP, etc) so they can update their systems to accommodate the 12 character UEI?	IAE has been communicating, and will continue to communicate, changes related to the DUNS/UEI migration in multiple forums including interagency governance bodies and a technical interfacing systems community.
Will larger businesses who currently have one DUNS with multiple +4's, be linked in SAM in some sort of hierarchy type of fashion?	Yes, a hierarchy of entities will continue to exist within SAM.
Just want to understand for Foreign entities not required to register in Sam.gov, will they continue to use their Duns numbers instead of the UEI? As the requirements to register in Sam.gov are not changing.	No. If an entity is required to have a DUNS number today, they will be required to have a SAM-generated Unique Entity Identifier after transitioning from D&B services in December 2020. There will be a UEI request process which does not require completing the full entity registration process.
Will you post all questions and answers from this session on the web site?	Yes. Questions & Answers will be posted to gsa.gov/entityid.
The URL provided to view the slides and video only returns a page with the name of the video - will the slides and video be uploaded there, or will there be a different URL provided?	The slides and video are also posted to gsa.gov/entityid.
We have "participating dealers" that are allowed to sell under our contract. Will those dealers be required to get a separate UEI?	The requirement for who must have a unique entity identifier isn't changing. If your "participating dealers" must have a DUNS number to sell under your contract today, then they will need to request a UEI from SAM.gov starting in December 2020. As noted in other responses, there is a process for requesting a UEI which doesn't require full entity registration in SAM.
Is there a planned end-date for issuance of new DUNS for purpose of SAM registration? Will this be sooner than	A DUNS will be required for entities registering in SAM through December 2020.

12/2020?	
For entities that are required to have a DUNS but not required to register in SAM.gov, would they now have to register in SAM.gov to get the UEI?	No. Entities who only need to get a UEI will be able to request one through SAM without going through the full entity registration process.
Clarification needed regarding if there will be a one to one cutover per current SAM Registration? Your response regarding that each large corp receiving an IAE per entity is confusing when a large corp has multiple SAM Registrations using the same Legal Entity name due to separation locations, financial data, etc.	Each SAM registration will have a UEI assigned. Remember, the definition of uniqueness is based on a combination of data, just like it is today: legal entity name and physical address are the biggest factors. Financial account information is not part of the entity uniqueness determination. Even today, entities can add additional financial accounts to their SAM entity registration using the Electronic Funds Transfer (EFT) Indicator (or DUNS+4) feature.
Can you provide additional details regarding the character set for UEI? Will it only contain alphabetic characters and numeric characters? Will any special characters be supported?	Please see the following Federal Register notice for format information - https://www.federalregister.gov/documents/2019/07/10/2019-14665/unique-entity-id-standard-for-awards-management
Is there a cut-off date for the assignment of new DUNS numbers?	After December 2020, SAM will no longer require or accept the DUNS number as part of an entity registration.
Will the UEIs be assigned to existing registrations in phases or all at once?	UEIs will be assigned all at once and entities will be notified once they are assigned.