

Department of Labor

W. Averell Harriman State Office Campus
Building 12, Room 440, Albany, NY 12240
www.labor.ny.gov

New York State Workforce Development System Technical Advisory #15-11 September 21, 2015

To: Workforce Development Community

SUBJECT: Subrecipients Unique Entity Identifier Requirement

PURPOSE

The purpose of this Workforce Development System Technical Advisory (WDS-TA) is to advise Local Workforce Development Boards (LWDBs) of the requirement for subrecipients of federal funding to acquire a unique entity identifier, commonly referred to as the Data Universal Numbering System (DUNS) number, and register with the System for Award Management (SAM).

This WDS-TA rescinds and replaces TA 11-16, Data Universal Numbering System (DUNS) Number and Central Contractor Registration (CCR) Requirements, issued December 29, 2011.

ACTION

LWDBs should:

- Determine the DUNS number of the entity designated by the Grant Recipient CEO to assist with financial management of WIOA , as identified in the WIOA CEO Agreement
 - This designated fiscal entity may be a County or City, or it may be an incorporated fiscal agent
 - The designated fiscal entity should not be the WDB, unless the WDB and the fiscal entity are parts of a single corporation
- Ensure their DUNS number has been registered in the SAM and has not expired
 - The SAM is located here: <https://www.sam.gov/portal/SAM/##11>
- Send this number, along with a confirmation that it is active in SAM, to the reporting mailbox: DEWS.aers-taa@labor.ny.gov
- We must receive this information no later than **September 30, 2015**
 - Failure to do so may result in suspension of cash draw-downs until the data is submitted

POLICY

All designated fiscal entities must have their DUNS number registered in the SAM and maintain the currency of that registration. If a designated fiscal entity changes their DUNS number, they must inform the New York State Department of Labor immediately. Please send an email with the corrected information to the following address:
DEWS.aers-TAA@labor.ny.gov

BACKGROUND

The June 2010 OMB Circular A-133 Compliance Supplement required states to ensure that their sub-recipients register their DUNS number in the CCR (now SAM) and maintain the currency of that registration. While this was originally intended for reporting of ARRA funds, the requirement was extended for the reporting of all federal sub-recipient awards under the Federal Funding Accountability and Transparency Act (FFATA). Additionally, the Uniform Administrative Requirements issued December 26, 2013 includes this as a requirement to apply for, receive, and report on a Federal award.

REFERENCES

June 2010 A-133 Compliance Requirements (page 3-M-1):

http://www.whitehouse.gov/omb/circulars/a133_compliance_supplement_2010

Federal Spending Transparency and Subaward and Compensation Data Reporting (page 9):

https://www.fsr.gov/documents/OMB_Guidance_on_FFATA_Subaward_and_Executive_Compensation_Reporting_08272010.pdf

Uniform Guidance Section 200.32 - Data Universal Numbering System (DUNS) number:

<http://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-sec200-32.pdf>

Uniform Guidance Section 200.331 - Requirements for pass-through entities:

<http://www.gpo.gov/fdsys/pkg/CFR-2014-title2-vol1/pdf/CFR-2014-title2-vol1-sec200-331.pdf>

INQUIRIES

Questions regarding this TA may be directed to: Sharie FitzGibbon,
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