MEMORANDUM FOR HEADS OF EXECUTIVE DEPARTMENTS AND AGENCIES

FROM   Clay Johnson III  
Deputy Director for Management

SUBJECT: Authority to Collect DUNS Number to Meet Requirements of the Federal Funding Accountability and Transparency Act of 2006

This memorandum provides authority to agencies to collect Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) numbers in applications for all types of financial assistance—other than grants or cooperative agreements, for which that authority was provided previously—that are subject to reporting requirements of the Federal Funding Accountability and Transparency Act of 2006 (“Transparency Act” or “the Act”, P.L.109-282). The authority for grants and cooperative agreements is in an Office of Management and Budget policy issuance announced on July 15, 2003 (attached memorandum) and published in the Federal Register [68 FR 38402, June 27, 2003].

The Transparency Act requires OMB to maintain a website at which the public can access and search certain data about agencies’ financial assistance and procurement awards, including subawards under them. One of the data elements the Act identifies is a unique identifier for award recipients. OMB implementation of the Act clarified that the DUNS number is the identifier to be provided. In order to enable agencies’ implementation of the Transparency Act, additional OMB approval is not required to add a DUNS number field to previously approved application forms for loans and other types of financial assistance subject to the Act.

This memorandum, and the 2003 policy issuance for grants and cooperative agreements, will be superseded by a more permanent policy that OMB plans to issue in title 2 of the Code of Federal Regulations on Transparency Act reporting of financial assistance awards and subawards.

Please note that this memorandum applies only to financial assistance awards. The Civilian Agency Acquisition Council and Defense Acquisition Regulatory Council has separately addressed Transparency Act requirements with respect to procurement instruments, including contracts, subcontracts, purchase orders, task orders, and delivery orders.

Thank you for your assistance in the implementation of the Transparency Act. If your agency has questions concerning the revised DUNS policy, please contact Marguerite Pridgen of OMB’s Office of Federal Financial Management at mpridgen@omb.eop.gov or 202-395-7844.

Attachment
MEMORANDUM FOR HEADS OF DEPARTMENTS AND AGENCIES

FROM: Clay Johnson III

SUBJECT: OMB Issues Grants Management Policies

The purpose of this memorandum is to announce the issuance of several grants management policies as described below. Each final policy notice is available on OMB’s website at www.whitehouse.gov/omb/grants/grants_docs.html.

- Revision to OMB Circular A-133, “Audits of States, Local Governments, and Non-Profit Organizations,” was published on June 27, 2003 [68 FR 38401]. The revision increases the threshold for audit from $300,000 to $500,000 per year; increases the threshold for cognizant agency for audit from $25 million to $50 million; and makes related technical changes.

- New policy requiring agencies to use a standard format for announcing Federal funding opportunities was published on June 23, 2003 [68 FR 37370]. This policy becomes effective on July 23, 2003, thirty days from the publication date. All implementing actions other than regulatory revisions must be completed by Executive departments and agencies within 3 months of the effective date. Regulatory revisions must be completed within 12 months.

- New policy requiring use of a Dun and Bradstreet (D&B) Data Universal Numbering System (DUNS) number when applying for Federal grants or cooperative agreements was published on June 27, 2003 [68 FR 38402]. This policy becomes effective on July 27, 2003, thirty days from the publication date, and requires use of a DUNS number on any application for Federal grants or cooperative agreements beginning October 1, 2003.

These policies are the first of many improvements resulting from a government-wide initiative to simplify and streamline the Federal grant-making processes, as mandated by the Federal Financial Assistance Management Improvement Act of 1999 (P.L. 106-107). This effort provides tangible support for the President’s Management Agenda, which calls for measurable results that matter in the lives of the American people. These policies reduce audit burden on grantees and make it easier to obtain information about that portion of the Federal budget (nearly one-sixth) provided to American citizens through grants and other cooperative agreements.

Questions regarding these policies should be directed to Joseph L. Kull, Deputy Controller, at 202-395-3993.