
This document is intended to function as a summary for convenience. It is not intended to replace or supplant terms of a Grant Agreement, federal guidance, rules, regulations, or state law. While the Grants Management Office (GMO) can provide guidance, those receiving SLFRF funds should seek final direction from their respective legal counsel and/or executive leadership on the compliant uses of the federal funds they are tasked to oversee.

Topic: Unique Entity Identifier (UEI) Requirements

Guidance:

Question: Which entities are required to submit an active Unique Entity Identifier (UEI)?

Answer: Before receiving a disbursement of SLFRF funds, Subrecipients, Secondary Subrecipients, and Contractors (both for-profit and nonprofit) receiving SLFRF funds must submit active UEIs that are compliant with 2 CFR 25.200-205. It is the responsibility of those receiving SLFRF funds to collect, confirm, and submit all UEIs.

Additional Information:

Subrecipients, Secondary Subrecipients and Contractors receiving SLFRF funds are not required to collect and submit active UEIs for the following:

- **Beneficiaries:** A beneficiary is traditionally an individual or an organization who is eligible for benefits that align with the purposes of the federal award. Beneficiaries are the end-recipients of the assistance via the program utilizing federal funds. Households, communities, small businesses, nonprofits, and impacted industries are all potential beneficiaries of projects carried out with SLFRF funds.¹ Subrecipients, Secondary Subrecipients and Contractors receiving SLFRF funds should consult the federal regulations and official guidance for more information concerning the distinction between awards to subrecipients requiring compliance with all federal requirements and beneficiaries.

Definitions:

Contractor means an entity that receives a *contract*.

Contract means, for the purpose of Federal financial assistance, a legal instrument by which a recipient or subrecipient purchases property or services needed to carry out the project or program under a Federal award. For additional information on subrecipient and contractor determinations, see 2 C.F.R. § 200.331.

Subaward means an award provided by a pass-through entity to a subrecipient for the subrecipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A subaward may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

Subrecipient means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award; but does not include an individual that is a beneficiary

¹ *Coronavirus State and Local Fiscal Recovery Funds: Project and Expenditures Report User Guide, Appendix F – Frequently Asked Questions.*

of such award. A subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

[Note that GMO guidance may refer to additional *sub-subrecipients*, e.g. *Secondary Subrecipients*. A *Secondary Subrecipient* is not a defined term in 2 C.F.R. § 200.1.

A **Secondary Subrecipient** means an entity that receives a subaward from a *Subrecipient* to carry out part of a Federal award; but does not include an individual that is a beneficiary of such award.

The “primary” Subrecipient functions similar to a pass-through entity and must make a case-by-case determination as to whether each sub-agreement it makes for the disbursement of Federal program funds casts the party receiving the funds in either the role of an additional subrecipient (e.g. “*Secondary Subrecipient*”) or a contractor. In making this determination the substance of the relationship is more important than the form of the agreement between the parties. Relevant characteristics in determining whether a party is an additional subrecipient or a contractor can be found in 2 C.F.R. § 200.331(a)-(b). The “primary” Subrecipient must ensure that the Secondary Subrecipient will comply with all existing federal requirements that the Subrecipient must follow or has agreed to comply with pursuant to a subaward agreement.]

SLFRF or SFRF means the Coronavirus State and Local Fiscal Recovery Funds program authorized by the American Rescue Plan Act.

UEI means the official Unique Entity Identifier for doing business with the U.S. Government as of April 4, 2022.

Resources:

- <https://sam.gov/content/home>
- <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-II>

Revision History:

This guidance may be periodically reviewed and revised.

Last Reviewed: 08/24/2023

Last Published: 08/24/2003

Last Revised: 08/24/2023