



**Rural Development
Business Center**

August 15, 2022

Chief Financial Officer

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TO: Agency Administrators
State Directors
National Office Officials
Associate Enterprise Directors
Program Directors

FROM: Tony Bainbridge /s/ **Tony Bainbridge**
Chief Financial Officer

SUBJECT: System for Award Management (SAM)
Registration Non-Procurement Exceptions

PURPOSE

SAM has been experiencing entity validation delays due to high demand. The change in registration requirements has increased the number of requests for registration. The transition from DUNS to UEI has also experienced challenges.

Title 2 of the Code of Federal Regulations (CFR) allows exceptions for an agency for loans, grants, subsidies, cooperative agreements, and guarantees. Specifically, [2 CFR 25.110](#) states in part:

- (c)(2) The conditions under which a Federal awarding agency may exempt an applicant or recipient are -
- (iii) For an applicant, if the Federal awarding agency makes a determination that there are exigent circumstances that prohibit the applicant from receiving a unique entity identifier and completing SAM registration prior to receiving a Federal award.

This Unnumbered Letter (UL) is issued to provide guidance for SAM registration and renewal exceptions. Agency Administrators, State Directors, and Program Directors should advise other personnel as appropriate.

BACKGROUND

SAM Registration and annual renewal is required for participants of all loans, grants, subsidies, cooperative agreements, and guarantees. The SAM website at <https://sam.gov> is an official website of the United States government managed by the General Services Administration. On April 4, 2022, the unique entity identifier used across the federal government changed from the Data Universal Numbering System (DUNS) number to the Unique Entity ID (UEI) generated by SAM.

EXPIRATION DATE:
August 31, 2023

FILING INSTRUCTIONS:
Administrative/Other Programs

IMPLEMENTATION RESPONSIBILITIES

When a registrant is unable to complete registration or annual renewal, the agency has the discretion to continue with all stages of the award process. The decision will be based upon two main factors:

1. It is determined that without an exception, the Government's interest would be adversely affected, if the assistance is not provided or such funding is necessary to enable an applicant/borrower/grantee to achieve program objectives.
2. The applicant/borrower has provided an incident number with documentation from SAM as evidence the SAM registration is in underway.

To request an exception, email the request to the following program staff and provide the following information:

Program	Name	Email
Single Family Housing Direct	Andria Hively	andria.hively@usda.gov
Single Family Housing Guaranteed	Kate Jensen	kate.jensen@usda.gov
Multi-Family Housing	Jonathan Bell	jonathan.bell@usda.gov
Community Facilities	Deborah Jackson	deborah.jackson2@usda.gov
Business and Cooperative Programs	Honie Turner	honie.turner@usda.gov
Water and Environmental Programs	Steve Polacek	steve.polacek@usda.gov
Electric Programs	RUS Electric	ruselectric@usda.gov
Telecommunication Programs	Applicable Project GFR	Applicable Project GFR

Information Required:

1. Applicant/Borrower/Grantee Name
2. Program Name
3. Award/Disbursement Amount
4. Submitting Official's Contact Information: Name, Phone, Email
5. The supporting justification for the exception (i.e., funding deadline, interest rate increase)
6. SAM Incident Number with email documentation from SAM

Once an exception decision is made, a response must be provided to the applicable Rural Development staff by program staff. Each program area will keep one log of responses.

Obtaining a complete SAM registration or renewal as applicable must be added to the Letter of Conditions or Conditional Commitment as applicable. The exceptions must be monitored by applicable program staff to ensure SAM registration or renewal is completed timely.

If there are any questions, please contact Heather Honkomp, Program Analyst, at 515-284-4486 or heather.honkomp@usda.gov, or Janet Stouder, Compliance Specialist, at 202-720-9278 or janet.stouder@usda.gov.