

EMPLOYMENT AND TRAINING ADMINISTRATION ADVISORY SYSTEM U.S. DEPARTMENT OF LABOR Washington, D.C. 20210	CLASSI FI CATI ON ARRA/DUNS/CCR
	CORRESPONDENCE SYMBOL OFAM/OGCM
	DATE June 10, 2009

ADVISORY: TRAINING AND EMPLOYMENT GUIDANCE LETTER NO. 29-08

TO: STATE WORKFORCE AGENCIES
STATE WORKFORCE LIAISONS
STATE WORKFORCE ADMINISTRATORS
STATE AND LOCAL WORKFORCE INVESTMENT BOARDS

FROM: DOUGLAS F. SMALL /s/
Deputy Assistant Secretary

SUBJECT: Dun & Bradstreet (D&B) Data Universal Numbering System (DUNS)
Number/Central Contractor Registration (CCR) Mandatory Requirement for
Federal Grant Sub-recipients under the American Recovery and Reinvestment
Act of 2009

1. Purpose. To inform the workforce system of the mandatory requirement for sub-recipients, i.e., any first-tier subcontract or sub-award funded in whole or in part under the American Recovery and Reinvestment Act of 2009 (Recovery Act), to obtain a DUNS number www.dnb.com. Any such sub-recipient must also establish and maintain active and current profiles in the CCR at www.ccr.gov.

2. References.

- The American Recovery and Reinvestment Act of 2009, Public Law 111-5
- The Office of Management and Budget (OMB) Implementing and Updated Guidance for the American Recovery and Reinvestment Act of 2009, dated February 18 (OMB# M-09-10) and April 3, 2009 (OMB# M-09-15)
- Federal Register Notice, Vol. 74, No. 61, Wednesday, April 1, 2009
- Training and Employment Guidance Letter No.17-08

3. Background. Pursuant to the Recovery Act, Division A, Section 1512(h), recipients of Recovery Act funds must be registered in the CCR database at www.ccr.gov. To register in the CCR database, the Federal Acquisition Regulation requires that an entity have a valid DUNS number. Because recipients must report information on their first-tier contracts and awards, the OMB guidance referenced in Section 2 also requires that sub-recipients register their DUNS number in CCR as a way to help ensure consistent reporting of data about each entity, thereby making the data more useful to the public. Without this requirement, multiple recipients doing business with the same entity may use different variations of the entity's name, address, or parent organization when they each report on their awards to the entity.

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OMB has determined that there is a need for improved statistical tracking of Federal grants, cooperative agreements, and loans, posed by the Recovery Act's transparency and accountability framework. Use of a DUNS number will provide a means to identify entities receiving Federal awards. The DUNS number will be used for tracking purposes and to validate address and point of contact information. The DUNS number is already used by the Federal government to identify entities receiving Federal contracts and grants.

4. Applicability. The DUNS/CCR requirement applies to all types of entities including direct recipients applying for Federal grants, cooperative agreements, or loans under the Recovery Act programs or activities and sub-recipients receiving funds under such awards. Under this requirement, a sub-recipient is defined as a non-Federal entity that expends Federal awards received from a pass-through entity to carry out a Federal program or activity, but does not include an individual that is a beneficiary of such a program. A sub-recipient may also be a recipient of other Federal awards directly from a Federal awarding agency. Recipients and sub-recipients must also maintain current registrations in CCR at all times during which they have active Federal awards funded with Recovery Act funds.

5. Action Requested. There are two new requirements for entities that anticipate being a sub-recipient of Recovery Act funds for Federal grants, cooperative agreements, or loans: 1) obtaining a DUNS number, and 2) registering with the CCR.

a. Obtaining a DUNS number. The first requirement is that sub-recipients must obtain a DUNS number in advance of a specific award. A DUNS number is a unique nine-character identification number provided by the commercial company D&B. Each sub-recipient is responsible for obtaining the number. Prior to requesting a DUNS number, the organization should investigate if a DUNS number has already been issued to the organization. Most large organizations, independent libraries, colleges and research universities already have DUNS numbers. Sub-recipients can obtain a DUNS number by calling a toll-free number 800-234-3867. The approximate time it takes to get a DUNS number is 10 to 15 minutes, and there is no charge. Applicants may also obtain a DUNS number by accessing the D&B Web site at <http://fedgov.dnb.com/webform>. The approximate time to create the number online is one business day. Applicants must note that information entered and used to obtain the DUNS number will be used to pre-populate the CCR.

After obtaining a DUNS number, sub-recipients should wait 24 to 48 hours to register with the CCR so that its DUNS number has time to become activated in the D&B records database. Once the DUNS number is established, the direct grant recipient and sub-recipient must maintain current registrations in the CCR at all times in which they have active Federal awards funded with Recovery Act funds.

b. Registering with the CCR. The second requirement for sub-recipients under the Recovery Act is to register with the CCR. The CCR is a government-wide registry for vendors doing business with the Federal government. The CCR centralizes information about grant recipients and also provides a central location for grant recipients to change organizational information. Information for registering with the CCR and online documents can be found at www.ccr.gov. Grant and sub-grant recipients should review the Central Contractor Registration user guide at <http://www.ccr.gov/handbook.asp>. If an organization has the necessary information ready, online registration will take approximately 30 minutes to complete; however, depending upon the size and complexity of the organization it could take

much longer. The CCR registration process also includes a validation on the Internal Revenue Service (IRS) Employer/Taxpayer Identification Number (EIN/TIN) of each new and updating CCR registrant according to the IRS records. Sub-recipients (and direct grant recipients) must annually update or renew their registration at www.ccr.gov, by clicking on the link entitled, "Update or Renew Registration." If you need assistance with the CCR registration process, you may contact the CCR Assistance Center, 24 hours a day, 7 days a week at 888-277-2423 or 269-961-5757.

1. *CCR Use of D&B Information.* In July 2006, CCR implemented a policy change related to data elements. Under this policy change, instead of obtaining name and address information directly from the registrant, CCR obtains the following data fields from D&B: Legal Business Name; Doing Business as Name; Physical Address; and Postal Code (Zip+4).

Registrants will not be able to enter or modify these fields in CCR as they will be pre-populated using previously registered DUNS records data. During a new registration, or when updating a record, the registrant has a choice to accept or reject the information provided from the D&B records. If the registrant agrees with the D&B supplied information, the D&B data will be accepted into the CCR registrant record. If the registrant disagrees with the D&B supplied data, the registrant must go to the D&B Web site at <http://fedgov.dnb.com/webform> to modify the information contained in the D&B records before proceeding with its CCR registration. Once D&B confirms the updated information, the registrant must revisit the CCR Web site and "accept" the D&B changes. Only at this point will the D&B data be accepted into the CCR record. This process can take up to 2 business days for D&B to send modified data to CCR, and that timeframe may be longer if the data is sent from abroad. Once a registration is submitted successfully, the organization will receive an email welcoming it to CCR.

2. *CCR EIN/TIN Validation.* To complete the CCR registration and satisfy the Recovery Act requirement as a sub-recipient for the Department of Labor (DOL) grants, the EIN/TIN combination you provide to the IRS Consent Form must match exactly to the EIN/TIN used in Federal tax matters. It will take approximately up to 2 business days to validate new and updated records prior to becoming active in CCR. Please be sure that the data items provided to D&B match information provided to the IRS. If the registration in D&B and the CCR do not match the IRS information, an error message will result. If there are discrepancies, they must be resolved before the registration will be completed. DOL recommends that applicant organizations carefully review their D&B and CCR registration information for accuracy immediately upon publication of this notice. If you have questions about your EIN/TIN, call 800-829-4933.

6. Inquires. Questions regarding this issuance should be directed to the appropriate Employment and Training Administration regional office.