



State of Arizona
Department of Education

Tom Horne
Superintendent of
Public Instruction

NSLP CN #15-11
SFSP CN #03-11
CACFP CN #002-11

MEMORANDUM

To: Child Nutrition Program Sponsors
From: Mary Szafranski, Deputy Associate Superintendent
Arizona Department of Education, Health & Nutrition Services
Date: December 20, 2010
RE: Mandatory Reporting of DUNS Number

Original Signed

In 2006, Congress passed the Funding Accountability and Transparency Act (FFATA) with the objective to promote transparency in government by enhancing the Federal Government's accountability for its stewardship of public resources. The Office of Management and Budget (OMB) has been implementing the act in phases and in September of 2010 they published guidance for the latest phase of FFATA implementation.

The new OMB guidance is cited at:

2 CFR Part 170 (*Reporting Subaward and Executive Compensation Information*), located 75 FR 55663 (September 14, 2010); and

2 CFR Part 25 (*Universal identifier and Central Contractor Registration*), located at 75 FR 55671 (September 14, 2010).

One of the new requirements established by the FFATA is that all current and potential **“first-tier subgrantees”** must obtain **DUNS numbers** to do business with the **“grantee”** under Federal **“assistance programs”**.

The Data Universal Numbering System or DUNS number is Dun & Bradstreet's copyrighted, proprietary means of identifying entities using a unique nine-digit identification number. If you do not already have a DUNS number you must request one online by going to <http://fedgov.dnb.com/webform>

In the case of the Federal Child Nutrition Programs (CNP) the programs themselves (e.g., National School Lunch Program, Summer Food Service Program, Child and Adult Care Food Program, etc.) are the "assistance programs", the "first-tier subgrantees" are you, the Sponsors of the CNP, and the "grantee" is the Arizona Department of Education (ADE). Specifically, the new FFATA requirement states that:

- a) no entity can receive a subgrant from the grantee unless that entity has furnished a DUNS number to the grantee; and
- b) the grantee is prohibited from awarding a subgrant to any entity that has failed to furnish a DUNS number to the grantee.

The new FFATA requirements went into effect on October 1, 2010 and therefore it is vital that ADE collect all Sponsor DUNS numbers immediately to ensure compliance. **Please complete the attached worksheet and fax back to ADE immediately.**

If you have questions about obtaining a DUNS number, please contact your assigned Specialist.