

**From:** [Senior Procurement Executives](#) on behalf of [Nathaniel Hopkins - M1Y](#)  
**To:** [SPE@LISTSERV.GSA.GOV](mailto:SPE@LISTSERV.GSA.GOV)  
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Sent on behalf of Lesley Field, Acting Administrator for Federal Procurement Policy and Deidre Harrison, Acting Controller

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Good Afternoon CFOC and CAOC Communities,

We ask agencies to share this information broadly with all HCAs, contracting officers, and appropriate award-making officials.

Because of your preparation and the exceptional work of GSA on the technology transition from the proprietary identifier to the new unique entity identifier, over 715,000 entities have been successfully validated and registered since April 4, 2022. Nevertheless, there have been some change management challenges and policy changes that we want to make sure you are tracking.

Verification and Validation Delays prior to SAM registration:

GSA is working to resolve delays in validation and verification due to implementation of policy changes from August 2020 for financial assistance, introducing new entities to the validation process, registrations by entities that are not required to register (such as subcontractors under grants and subawardees, businesses accepting the government purchase card), and some other changes. Efforts to address these delays include actions by GSA for the validation and verification process, as well as an escalation process for agencies that is managed by members of the FACE and PCE. In certain circumstances, agencies can use the flexibilities provided in regulations, such as 2CFR § 25.110 for awards and 48 CFR (the Federal Acquisition Regulation) Parts 4.1102 and 4.1103 for procurement.

Award Flexibilities:

As we enter the 4th quarter, we want to remind agencies of the flexibilities available in 2CFR and 48 CFR (FAR) and take a risk-based approach in making awards.

2CFR § 25.110 award flexibilities: <https://www.ecfr.gov/current/title-2/subtitle-A/chapter-1/part-25/subpart-A/section-25.110>  
[48CFR](#) (FAR) parts 4.1102 and 4.1103

Agencies are also offering flexibilities in payment processes. Using a risk-based determination, some agencies are using the GSA help desk ticket number of a contractor as confirmation of a good-faith effort to revalidate/re-register, in order for the agency to proceed with payments in the interim period while the revalidation/re-registration is in progress.

Ticket Escalation:

Information on the process for escalating help requests from entities has been provided to agency leaders on the PCE and FACE.

#### Registration Requirement Reminder:

We want to remind agencies that external organizations that do not have a prime federal award (such as subcontractors under grants and subawardees, businesses that accept the purchase card, etc.) should not be instructed to register in SAM and obtain a UEI to receive awards and/or payments. There is no statutory or policy basis for such an arrangement, and it may further contribute to entity validation delays for those and other organizations. In addition, subaward recipients are not required to complete a full SAM registration, rather a streamlined process to obtain a UEI is in place and outlined here [<https://sam.gov/content/entity-registration>]. Per 2CFR § 25.105, awards apply to a Federal awarding agency's grants, cooperative agreements, loans, and other Federal financial assistance as defined in § 25.406.

#### Status meetings:

GSA hosts regular meetings (twice weekly) with interagency governance members to share updates and gather feedback. Your agency FACE and PCE members will have the latest on both those meetings and the information shared.

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