**DFARS PGI Case 2025-P002**

**Data Universal Numbering System to Unique Entity Identifier Conversion**

**PGI Text**

## PGI 204—Administrative and Information Matters

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## PGI 204.6—CONTRACT REPORTING

**[PGI 204.601 Definitions.]**

As used in this subpart, the unique entity identifier **[(UEI)** is currently the **[UEI assigned by the System for Award Management (SAM)]**~~Data Universal Numbering System (DUNS) number~~.

## PGI 204.602 General.

## (1) \* \* \*

## (i) *FPDS Data Element Dictionary*. The data dictionary outlines relevant information for each data field. The Data Dictionary identifies whether a data field is “Required,” “Optional,” “Propagates from the base action,” “Not Applicable,” or “System Generated,” for each type of data entry screen (Awards, Indefinite-Delivery Vehicles, and Transactions/Modifications). It also identifies the source of data entry (e.g., Contracting Officer, ~~System for Award Management (~~SAM~~)~~, FPDS); the format of the field; and whether the field input is derived from entries in other fields. At the back of the Data Dictionary is a useful summary.

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### PGI 204.606 Reporting data.

**[****The use of generic UEIs is limited to those rare circumstances outlined at FAR 4.605(c). Use generic UEIs only for the purposes of reporting contract award data to the FPDS. In cases where generic codes are required for reporting, use both the generic UEI and its associated CAGE code.]** Do not enter a generic **[UEI,]**~~DUNS number~~ used for reporting to ~~the~~ **[FPDS]**~~Federal Procurement Data System (FPDS) (see FAR subpart 4.6)~~, nor a generic CAGE code that corresponds to a generic **[UEI]**~~DUNS number~~, on any contractual document. ~~These generic codes shall only be used for reporting to FPDS.~~ Using the generic codes on ~~actual~~ contract actions masks the true identity of the vendor and ~~immediately~~ makes any accurate electronic processing of invoices, receiving reports, and payments impossible; and **[it]** can, in fact, result in misdirected payments. As a reminder FAR subpart 4.18 requires each contractor be identified by its actual CAGE code on contract actions; there is no exemption to the requirement for an actual CAGE code.

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(1) Methods of reporting to FPDS.

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(iii) Express reporting (consolidated reporting of multiple contract actions, to be submitted at least monthly).

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(B) When express reports reflect more than one contractor for overseas actions or consolidated delivery orders made using the GPC where identification of the contract or agreement is not possible, use the appropriate generic **[UEI]**~~DUNS number~~.

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(D) When express reports are used, the contracting officer must maintain a log of individual actions being summarized on the express reports and ensure it is available for audit purposes. Logs must include the following, at a minimum, for each action: procurement instrument identifier (PIID) used for the express report under which action is summarized, referenced **[i]**~~I~~ndefinite-**[d]**~~D~~elivery **[v]**~~V~~ehicles (IDV) PIID (if the express report is summarizing task/delivery/call orders), date of award, obligation amount, vendor name, and **[UEI]**~~DUNS number~~ (if known).

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(3) Specific instructions for entering data in FPDS.

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(v) FPDS Entry – Dates Section.

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(F) \* \* \*

**[(*5*)** **For new indefinite-delivery contracts awarded under a multiple-award solicitation’s on-ramp procedures that were awarded at least 3 months after the initial round of indefinite-delivery contracts were awarded, enter the date the awardee provided a proposal as the “Solicitation Date.”]**

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(viii) FPDS Entry – Contractor Information Section.

(A) Enter the **[UEI]** ~~DUNS number~~ for the vendor in the **[“Unique Entity Identifier”]**“~~DUNS Number~~” data field. This **[UEI]**~~DUNS number~~ will be used to pull the associated current **[registration]**~~record~~ from the ~~System for Award Management (~~SAM~~)~~ database.

(B) If a SAM exception applies to the procurement, ensure the correct exception is chosen from the “SAM Exception” data field. In this case the **[UEI]**~~DUNS number~~ entered in the **[“Unique Entity Identifier”]**“~~DUNS Number~~” data field will be used to pull the contractor’s name and location information from **[SAM’s UEI]** ~~Dun & Bradstreet’s~~ database **[instead of SAM active registrations].**

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(4) Reporting modifications to FPDS.

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(ii) Contracting officers should choose the “Reason for Modification” value that best represents the purpose of the modification action. If more than one reason for modification applies, choose the more specific value. When a name, address, **[UEI]**~~DUNS number~~, or CAGE code change occurs as the result of the modification, choose “Novation,” “Vendor **[UEI]**~~DUNS~~ Change,” or “Vendor Address Change,” per the instructions at paragraphs (4)(v), (vi)**[,]** and (vii), rather than other values that may also apply to the action (e.g., Exercise Option).

(iii) Do not use “Close Out” as the reason for modification in FPDS unless the modification being reported actually accomplishes the close out of the award.

(iv) DoD offices shall not use the “Transfer Action” value in the “Reason for Modification” field unless transferring the contract to a non-DoD contracting office (e.g., Department of Interior).

(v) Modifications for novations (see FAR subpart 42.12 and DFARS subpart 242.12) shall use “Novation Agreement” in the “Reason for Modification” field.

(A) When this value is used, the contracting officer shall enter the appropriate **[UEI]**~~DUNS number~~ for the contractor in the modification contract action report. FPDS will then bring over the current vendor name and address from the contractor’s SAM record for that **[UEI]**~~DUNS number~~ into the modification contract action report. Subsequent contract action reports will show the updated **[UEI]**~~DUNS number~~ and vendor name.

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(vi) Modifications for contractor name changes that do not require a novation (see FAR subpart 42.12 and DFARS subpart 242.12) shall use “Vendor **[UEI]**~~DUNS~~ Change” in the “Reason for Modification” field. When this value is used, the contracting officer shall enter the appropriate **[UEI]**~~DUNS number~~ for the contractor in the modification contract action report. FPDS will then bring over the current vendor name and address from the contractor’s SAM record for that **[UEI]**~~DUNS number~~ into the modification contract action report. Subsequent contract action reports will show the updated **[UEI]**~~DUNS number~~ and vendor name.

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(5) Reporting awards where the GPC is both the method of purchase and payment.

(i) Do not report open-market purchases (i.e., not under a Federal Supply schedule, agreement, or contract) made with the GPC valued less than the micro-purchase threshold to FPDS.

(ii) Purchases made using the GPC as the method of both purchase and payment under federal schedules, agreements, or contracts are required to be reported to FPDS regardless of value. Contracting offices shall ensure all such purchases made by their authorized cardholders are reported to FPDS no less frequently than monthly. Any individual purchase valued greater than $25,000 shall be reported individually to FPDS. For individual purchases valued less than $25,000, there are three acceptable methods for reporting to FPDS. They are, in preferred order of use—

(A) Report each order individually to FPDS;

(B) Report a consolidated express report to FPDS using the delivery order or BPA call format that references the individual contract or BPA, respectively; or

(C) Report a consolidated express report to FPDS using the purchase order format that uses the generic **[****UEI R5NWZ87HPLX4]**~~DUNS 136721250~~ for “GPC Consolidated Reporting” or **[****U9X7H1UVY6U5]**~~136721292~~ for “GPC Foreign Contractor Consolidated Reporting”, as appropriate~~, as the identifier~~. Note that when a generic **[UEI]**~~DUNS number~~ is used to report these actions, only “Other than Small Business” is allowed as the “Contracting Officer’s Determination of Business Size” selection.

(iii) For orders placed on FedMall, contracting officers are not required to separately report such awards to FPDS.

(6) Using generic **[UEIs]**~~DUNS numbers~~.

(i) Generic **[UEIs]**~~DUNS numbers~~ may only be used for reporting to FPDS in accordance with FAR 4.605(c) or paragraph ~~204.606~~(5)(ii)(C) of this section. Note that if a generic **[UEI]**~~DUNS number~~ is used on the report to FPDS, systems that prepopulate data based on the **[UEI]**~~DUNS number~~ reported to FPDS may not be able to use the **[UEI]**~~DUNS number~~ for further reporting on that contract action because the contractor identification information is not accurately reflected. For example, assessing officials cannot report past performance reports to the Contractor Performance Assessment Reporting System (CPARS) (see FAR subpart 42.15) if a generic **[UEI]**~~DUNS number~~ was used to report the action to FPDS. Additionally, some reporting requirements placed on the contractor, such as subcontract reporting required by FAR subparts 4.14 and 19.7, are not able to be completed. Therefore, it is important that the use of generic **[UEIs]**~~DUNS numbers~~ in reporting to FPDS be rare and only when necessary.

(ii) The following generic **[UEIs]**~~DUNS numbers~~ are available for use in contract reporting only if the conditions in FAR 4.605(c) or paragraph ~~204.606~~(5)(ii)(C) of this section apply:

(A) **[UEI LX9KAH68DKV5]**~~DUNS 167445928~~ – Student Workers in Laboratories. Used to report actions awarded to student workers providing goods/services in **[G]**~~g~~overnment laboratories (or other **[G]**~~g~~overnment facilities) when obtaining a **[UEI]**~~DUNS number~~ would place a financial hardship on the student. Corresponding CAGE code in the System for Award Management (SAM): 35HL9.

(B) **[UEI LN9PU5M2YZN5]**~~DUNS 123456787~~ – Miscellaneous Foreign Awardees. Used to report actions awarded to vendors located outside the United States providing goods/services when a specific **[UEI]**~~DUNS number~~ is not available. Corresponding CAGE code in SAM: 35KC0.

(C) **[UEI L2UVLEUTJU39]**~~DUNS 136666505~~ – Spouses of Service Personnel. Used to report actions awarded to service personnel dependents located and providing goods/services outside the United States when obtaining a **[UEI]**~~DUNS number~~ would place a financial hardship on the dependent. Corresponding CAGE code in SAM: 3JDV7.

(D) **[UEI KBD2CJ5JXJV5]**~~DUNS 167446249~~ – Navy Vessel Purchases In Foreign Ports. Used to report actions awarded to vendors located outside the United States providing goods/services in support of vessels located in foreign ports when a specific **[UEI]**~~DUNS number~~ is not available. Corresponding CAGE code in SAM: 35KD3.

(E) **[UEI JKRMS84PMND5]**~~DUNS 153906193~~ – Foreign Utility Consolidated Reporting. Used to report procurement actions awarded to vendors located outside the United States providing utilities goods/services when a specific **[UEI]**~~DUNS number~~ is not available. Corresponding CAGE code in SAM: 3JDX5.

(F) **[UEI KA5HQCLKUVW1]**~~DUNS 790238638~~ – Domestic Awardees (Undisclosed). Used to report actions awarded to vendors located in the United States where identifying the vendor could cause harm to the mission or the vendor (for example, domestic shelters). Corresponding CAGE code in SAM: 3JEH0.

(G) **[UEI NN2NGPDNCK23]**~~DUNS 790238851~~ – Foreign Awardees (Undisclosed). Used to report actions awarded to vendors located outside the United States when identifying the vendor could cause harm to the mission or the vendor. Corresponding CAGE code in SAM: 3JEV3.

(H) **[UEI R5NWZ87HPLX4]**~~DUNS 136721250~~ – GPC Consolidated Reporting. Used to report orders and calls issued via the GPC under indefinite-delivery type contracts and agreements to businesses located in the United States, and ~~the identity of~~ the **[UEI]**~~DUNS number~~ for the vendor is not available to the office reporting the action. Corresponding CAGE code in SAM: 3JDW4.

(I) **[UEI U9X7H1UVY6U5]**~~DUNS 136721292~~ – GPC Foreign Contractor Consolidated Reporting. Used to report orders and calls issued via the GPC under indefinite delivery type contracts and agreements to businesses located outside the United States, and ~~the identity of~~ the **[UEI]**~~DUNS number~~ for the vendor is not available to the office reporting the action. Corresponding CAGE code in SAM: 3JDV9.

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## PGI 204.18—COMMERCIAL AND GOVERNMENT ENTITY CODE

### PGI 204.1870 Procedures.

#### PGI 204.1870-1 Instructions to contracting officers.

Contracting officers shall—

(a) Assist offerors in obtaining the required Commercial and Government Entity (CAGE) codes. Note that if an offeror’s facility requires security clearance in accordance with a potential contract, the offeror is required to have a CAGE code assigned to that facility. If the facility is a location other than the offeror’s office submitting the proposal, that facility is not required to be separately registered in the System for Award Management (SAM) in order to have a CAGE code assigned. Offerors may be directed to the DLA CAGE Branch (see PGI 204.1870-2(c) for contact information);

(b) Not deny a potential offeror a solicitation package because the offeror does not have a CAGE code, **[unique entity identifier]**~~DUNS number~~, or TIN;

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#### PGI 204.1870-2 Maintenance of the CAGE file.

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(c) Changes of information on the CAGE code record.

(1) The DLA CAGE Branch accepts written requests for changes to CAGE files from the following sources:

(i) The company, organization, or sole proprietor entity identified by the code, if located in the United States or its outlying areas.

(A) For CAGE records for which there is a corresponding registration in SAM, the entity shall update ~~their Dun & Bradstreet (D&B) record to begin the process and then proceed to update~~ and submit their SAM registration for validation. If the update includes a change to the entity’s legal business name, the additional steps at PGI 204.1870-2(c)(3)(i)(C) will be necessary.

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### PGI 209—Contractor Qualifications

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**PGI 209.4—DEBARMENT, SUSPENSION, AND INELIGIBILITY**

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**PGI 209.406 Debarment.**

**PGI 209.406-3 Procedures.**

(i) *Investigation and referral*. When referring any matter to the agency debarring and suspending official for consideration, provide the following specific information and documentation, to the extent practicable. Send two copies (one paper and one electronic) of each report, including enclosures.

(ii) For all referrals, provide the following:

(A) Name, address, and telephone number of the point of contact for the activity making the report.

(B) Name and address of the referred individual/contractor, CAGE code, and **[unique entity identifier]** ~~DUNS number~~, if applicable.

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PGI 253.215 ~~--~~ Contracting by negotiation.

## PGI 253.215-70 DD Form 1547, Record of Weighted Guidelines Application.

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(c) *Specific instructions for completion of DD Form 1547*.

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(7) BLOCK 7-- **[UNIQUE ENTITY IDENTIFIER]** ~~DUNS NUMBER~~. Enter the contractor **[UEI]** ~~establishment code number~~.