

Amendment 1
Q&A 21 MAY 2026

BLUF: A foreign vendor does not need to have an NCAGE code to bid on a subcontract RFP or to be awarded a subcontract by BFA; however, a Unique Entity Identifier (UEI) is required for BFA to comply with post-subcontract-award reporting requirements.

1. Does an international vendor need a NCAGE code to submit a proposal to a subcontract RFP?

- No, BFA does not have any contractual obligations to require prospective suppliers to have an NCAGE at the time of subcontract proposal submission.

2. Does an international vendor need a NCAGE code to be awarded a subcontract?

- No. BFA can, at their discretion, only require a UEI to award to a subcontractor. An NCAGE code is not required to obtain a UEI in SAM.
- FAR 52.204-13 imposes a requirement for subcontractors to fully register in SAM.gov, however, it does not contain a flow down requirement and can be omitted at BFA's discretion.
 - Note: Absent the full entity registration in SAM, BFA must still verify, via other means, that the subcontractor is not excluded, debarred, suspended or otherwise ineligible for award. This can be done via BFA's standard ["ANNUAL FEDERAL REPRESENTATIONS, CERTIFICATIONS AND OTHER STATEMENTS OF OFFERORS" form.](#)

3. When, in general, are NCAGE and CAGE codes required?

- NCAGE and CAGE codes are required when a vendor desires to apply for, and receive, a prime award directly from the Government.
 - CAGE codes are obtained after submitting for full registration in SAM.
 - NCAGE codes are obtained through the NATO Support and Procurement Agency Codification Tool and are required for a foreign entity to complete full entity registration in SAM.

4. Are other types of registrations, such as a partial (to obtain a UEI) or full registration required?

- At a minimum, a UEI is required for BFA to fulfill their reporting requirements under FAR 52.204-10 (Reporting Executive Compensation and First-Tier Subcontract Awards).
- A CAGE or NCAGE code may be still incidentally required as a result of other contractual terms, such as when a subcontractor is required to comply with DFARS 252.204-7019 (Notice of NIST SP 800-171 DoD Assessment Requirements), as a CAGE code is a required element for SPRS score submission.

5. If I am an international supplier, do I need DUNs?

- A UEI can replace the DUNs. As long as a supplier has a UEI, they don't need DUNs.

6. What if I don't know my NAICS #?

- Please put NA under NAICS Code section if unknown
- All US-based companies should be able to provide NAICS, this will likely be NA for international companies.