

## Recipient Data Insights - Do Not Pay

The Recipient Data Insights (RDI) Dashboard screen's Compliance card section for Do Not Pay has been updated with two new compliance indicators: the IRS Tax Exempt Revocation List and the Excluded Foreign Entities list.

To accommodate the larger size for the Do Not Pay feature, the FAPIIS indicator has been moved below the SAM.gov compliance indicators.

The screenshot displays the RDI Dashboard for Putnam County Of. The top navigation bar includes a search bar and a user profile icon. The left sidebar shows organization information, including award dollars received (\$11,279,413.00) and various identifiers (UEI, DUNS, EIN). The main content area is divided into several sections: Compliance, SAM.GOV, EXCLUDED PARTIES, FAPIS, and DO NOT PAY. The Compliance section shows a green checkmark indicating the recipient is within compliance. The SAM.GOV section includes indicators for Registration Active and No Debt Reported. The EXCLUDED PARTIES section shows a green checkmark for No Exclusion. The FAPIS section shows a green checkmark for Not Listed on FAPIS. The DO NOT PAY section includes two new indicators: Not Applicable for IRS Tax Exempt Revocation List and Not on the Excluded Foreign Entities list. A callout box points to the DO NOT PAY section with the text 'Do Not Pay has expanded to include two new indicators'. Another callout box points to the FAPIS indicator with the text 'FAPIS has moved below the SAM.gov indicators'.

Figure 1: Dashboard containing new Do Not Pay indicators

Please note: Based on the name, users often assume that “Do Not Pay” is a single indicator for whether or not a Recipient should receive funding, similar to the SAM.gov Excluded Parties indicator (or its predecessor EPLS). Do Not Pay (DNP) is a repository of various data sources. The Department of Treasury collects and shares data from various agencies for use in [“preventing and detecting improper payments”](#). Some of the data they maintain is already available in RDI (ex: SAM.gov registration, Federal Debt, FAPIS, etc...) from a different source (ex: SAM.gov, FAPIS). The two DNP indicators added with this release provide new compliance information for organizations.

## IRS TAX EXEMPT REVOCATION LIST

**Partners Impacted: All**

**Activation Required: No**

**User Type(s)/Role(s) Impacted: Grantors**

Nonprofit organizations can apply for IRS Tax Exemption. However, if they fail to submit their IRS 900 forms for 3 years in a row, the tax exempt status will be revoked and the organization is added to the Department of Treasury's Automatic Revocation of Exemption List. For simplicity the list is called the "IRS Tax Exempt Revocation List".

When a GrantSolutions user searches RDI for an organization, RDI sends a request to Do Not Pay to determine if the organization is included on the IRS Tax Exempt Revocation List. Since RDI is checking DNP in real-time, the Last Update date will always be today.

## Scenario 1: Nonprofit Organization's Tax Exempt Status has been Revoked

If a nonprofit organization has previously had a Tax Exemption that was revoked and not reinstated, then the system will show the following:

- A yellow warning indicator
- The status "On IRS Tax Exempt Revocation List"
- The date the Tax Exempt Status was revoked
- A "View More Info" link that opens a modal containing the text "IRS Tax Exemption Revoked due to failure to submit 990s for three consecutive years."

As with the previous compliance indicators, if the IRS Tax Exempt Revocation List flag is yellow then the Compliance indicator in the hero and at the top of the Compliance card will be yellow as well.

A Nonprofit whose Tax Exempt Status has been revoked will have a yellow indicator, a "On IRS Tax Exempt Revocation List" status, the revocation date, and a "View More Info" link to open a modal explaining why.

If this indicator is yellow, then the overall Compliance indicators are yellow too

IRS Tax Exempt Revocation List

IRS Tax Exemption Revoked due to failure to submit 990s for three consecutive years.

Got it

Figure 2: Nonprofit Organization on the IRS Tax Exempt Revocation List

## Scenario 2: Nonprofit Organization's Tax Exempt Status has been Reinstated

If a nonprofit organization has previously had their Tax Exemption revoked but it has since been reinstated, then the system will show the following:

- A green indicator
- The status “Reinstated on IRS Tax Exempt Revocation List”
- The date the Tax Exempt Status was reinstated
- A “View More Info” link that opens a modal containing the Reinstatement Date and Revocation Date

As with the previous compliance indicators, if the IRS Tax Exempt Revocation List flag and all other indicators are green, the Compliance indicator in the hero and at the top of the Compliance card will be green.

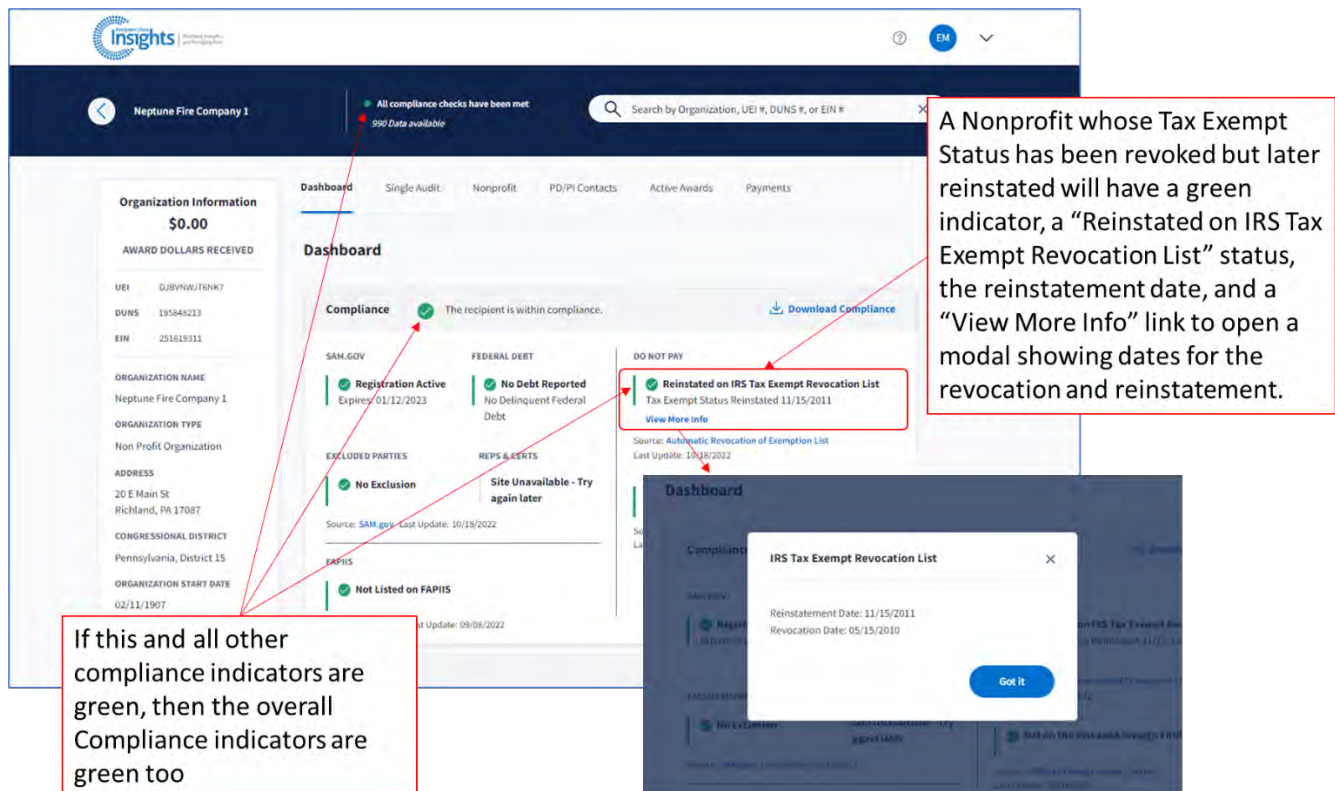


Figure 3: Nonprofit Organization Reinstated from the IRS Tax Exempt Revocation List



### Scenario 3: Nonprofit Organization's Tax Exempt Status has never been Revoked

If a nonprofit organization has never had their Tax Exemption revoked, then the system will show the following:

- A green indicator
- The status "Not Included on IRS Tax Exempt Revocation List"

As with the previous compliance indicators, if the IRS Tax Exempt Revocation List flag and all other indicators are green, the Compliance indicator in the hero and at the top of the Compliance card will be green.

**Organization Information**  
\$0.00  
AWARD DOLLARS RECEIVED

UEI: JHGN9QCG1C6  
DUNS: 93351062  
EIN: 140028179

ORGANIZATION NAME: Putnam Hospital Center  
ORGANIZATION TYPE: Hospital  
Non Profit Organization  
ADDRESS: 670 Stoneleigh Ave, Carmel, NY 10512  
CONGRESSIONAL DISTRICT: New York, District 18  
ORGANIZATION START DATE:

**Dashboard**

All compliance checks have been met  
\$90 Data available

Search by Organization, UEI #, DUNS #, or EIN #

**Compliance** ✔ The recipient is within compliance. [Download Compliance](#)

**SAM.GOV**  
✔ **Registration Active**  
Expires: 09/20/2023

**FEDERAL DEBT**  
✔ **No Debt Reported**  
No Delinquent Federal Debt

**DO NOT PAY**  
✔ **Not Included on IRS Tax Exempt Revocation List**  
Source: Automatic Revocation of Exemption List  
Last Update: 10/18/2022

**EXCLUDED PARTIES**  
✔ **No Exclusion**  
Source: SAM.gov Last Update: 10/10/2022

**REPS & CERTS**  
✔ **Site Unavailable - Try again later**

**Not on the Excluded Foreign Entities list**  
Source: Office of Foreign Assets Control  
Last Update: 10/18/2022

**FAPIS**  
✔ **Not Listed on FAPIIS**  
Last Update: 09/08/2022

If this and all other compliance indicators are green, then the overall Compliance indicators are green too

A Nonprofit whose Tax Exempt Status has never been revoked but later reinstated will have a green indicator and a "Not Included on IRS Tax Exempt Revocation List" status.

Figure 4: Nonprofit Organization not on the IRS Tax Exempt Revocation List

#### Scenario 4: Not a Nonprofit Organization

If an organization is not a Nonprofit, then the Tax Exemption does not apply and the system will show the following:

- A green indicator
- The status “Not Applicable for IRS Tax Exempt Revocation List”

As with the previous compliance indicators, if the IRS Tax Exempt Revocation List flag and all other indicators are green, the Compliance indicator in the hero and at the top of the Compliance card will be green.

The screenshot shows the GrantSolutions Recipient Data Insights dashboard for Putnam County Of. The dashboard displays the following information:

- Organization Information:** \$11,279,413.00 AWARD DOLLARS RECEIVED. UEI: GLW9UJQRBB8, DUNS: 072709553, EIN: 146002759. ORGANIZATION NAME: Putnam County Of, ORGANIZATION TYPE: U S Local Government, ADDRESS: Bldg 40 Glencida Ave 3rd Fl, Carmel, NY 10512, CONGRESSIONAL DISTRICT: New York, District 18, ORGANIZATION START DATE: [blank].
- Compliance Status:** All compliance checks have been met (Green indicator).
- Compliance Checks:**
  - Registration Active:** Expires: 02/17/2023 (Green indicator).
  - No Debt Reported:** No Delinquent Federal Debt (Green indicator).
  - Not Applicable for IRS Tax Exempt Revocation List:** (Green indicator, highlighted by a red box).
  - Not on the Excluded Foreign Entities list:** (Green indicator).
  - Not Listed on FAPIIS:** (Green indicator).

Two red boxes with arrows pointing to the dashboard elements contain the following text:

- Top Right Box:** An organization that is not a Nonprofit will have a green indicator and a “Not Applicable for IRS Tax Exempt Revocation List” status.
- Bottom Left Box:** If this and all other compliance indicators are green, then the overall Compliance indicators are green too.

Figure 5: Not a Nonprofit Organization so not on the IRS Tax Exempt Revocation List

### Scenario 5: Connection to Do Not Pay is Down

If DNP does not provide a response to GrantSolutions, then the system will show the following:

- A gray indicator
- The status "Site Unavailable - Try again later"

If DNP does not provide a response, this field will have a gray indicator and a "Site Unavailable – Try again later" status.

Compliance ✓ The recipient is within compliance. [Download Compliance](#)

**SAM.GOV**  
✓ **Registration Active**  
Expires: 11/30/2022

**FEDERAL DEBT**  
✓ **No Debt Reported**  
No Delinquent Federal Debt

**DO NOT PAY**

**IRS Tax Exempt Status**  
Site Unavailable - Try again later

**EXCLUDED PARTIES**  
✓ **No Exclusion**  
Source: [SAM.gov](#) Last Update: 09/13/2022

**REPS & CERTS**  
Site Unavailable - Try again later

**EXCLUDED FOREIGN ENTITIES**  
Site Unavailable - Try again later

**FAPIS**  
✓

If this is gray, then the overall Compliance indicators do not consider it when determining whether to show as green or yellow

Figure 6: No response from the Do Not Pay IRS Tax Exempt Revocation List

## EXCLUDED FOREIGN ENTITIES

**Partners Impacted: All**

**Activation Required: No**

**User Type(s)/Role(s) Impacted: Grantors**

The Office of Foreign Assets Control (OFAC) within the Department of Treasury maintains an Excluded Foreign Entities list. Do Not Pay says this [“Contains a list of individuals and companies owned or controlled by, or acting for or on behalf of, targeted countries. It also lists individuals, groups, and entities, such as terrorists and narcotics traffickers designated under programs that are not country specific; collectively, such individuals and companies are called “Specially Designated Nationals” or “SDNs”; their assets are blocked, and U.S. persons are generally prohibited from doing business with them”.](#)

When a GrantSolutions user searches RDI for an organization, RDI send a request to Do Not Pay to determine if the organization is included on the OFAC’s Excluded Foreign Entities list. Since RDI is checking DNP in real-time, the Last Update date will always be today.

### Scenario 1: On the OFAC’s Excluded Foreign Entities list

If an organization is on the OFAC’s Excluded Foreign Entities list, then the system will show the following:

- A yellow warning indicator
- The status “On the Excluded Foreign Entities list”
- A “View More Info” link that opens a modal containing the text “This organization appears on the Specially Designated Nationals List and is prohibited from entering into financial transactions with U.S. Government.”

As with the previous compliance indicators, if the Excluded Foreign Entities List flag is yellow then the Compliance indicator in the hero and at the top of the Compliance card will be yellow as well.



## Scenario 2: Not on the OFAC's Excluded Foreign Entities list

If an organization is not on the OFAC's Excluded Foreign Entities list, then the system will show the following:

- A green indicator
- The status "Not on the Excluded Foreign Entities list"

As with the previous compliance indicators, if the OFAC's Excluded Foreign Entities flag and all other indicators are green, the Compliance indicator in the hero and at the top of the Compliance card will be green.

The screenshot shows the GrantSolutions Recipient Data Insights dashboard for Putnam County Of. The dashboard displays various compliance indicators, all of which are green. A red box highlights the 'Not on the Excluded Foreign Entities list' status, and another red box highlights the overall 'Compliance' indicator.

**Organization Information**  
\$11,279,413.00  
AWARD DOLLARS RECEIVED

UEI: GLK9KJQWBB  
DUNS: 972709553  
EIN: 146002759

ORGANIZATION NAME: Putnam County Of  
ORGANIZATION TYPE: County  
U.S. Local Government  
ADDRESS: Bldg 40 Glenecida Ave 3rd Fl  
Carmel, NY 10512  
CONGRESSIONAL DISTRICT: New York, District 18  
ORGANIZATION START DATE: [blank]

**Dashboard**

**Compliance** ✔ The recipient is within compliance. [Download Compliance](#)

**SAM.GOV**  
✔ **Registration Active**  
Expires: 02/17/2023

**FEDERAL DEBT**  
✔ **No Debt Reported**  
No Delinquent Federal Debt

**DO NOT PAY**  
✔ **Not Applicable for IRS Tax Exempt Revocation List**  
Source: Automatic Revocation of Exemption List  
Last Update: 10/18/2022

**EXCLUDED PARTIES**  
✔ **No Exclusion**  
Source: SAM.gov Last Update: 10/18/2022

**REPS & CERTS**  
✔ **Not on the Excluded Foreign Entities list**  
Source: Office of Foreign Assets Control  
Last Update: 10/18/2022

**FAPIS**  
✔ **Not Listed on FAPIS**  
Update: 09/08/2022

**Site Unavailable - Try again later**

[View Single Audit Details](#)

**Annotations:**

- An organization that is not on the Excluded Foreign Entities list will have a green indicator and a "Not on the Excluded Foreign Entities list" status.
- If this and all other compliance indicators are green, then the overall Compliance indicators are green too.

Figure 7: Not a Nonprofit Organization so not on the IRS Tax Exempt Revocation List

### Scenario 3: Connection to Do Not Pay is Down

If DNP does not provide a response, then the system will show the following:

- A gray indicator
- The status "Site Unavailable - Try again later"

The screenshot displays a compliance dashboard with the following sections:

- Compliance:** A green checkmark icon and the text "The recipient is within compliance." with a "Download Compliance" link.
- SAM.GOV:** "Registration Active" with a green checkmark and "Expires: 11/30/2022".
- FEDERAL DEBT:** "No Debt Reported" with a green checkmark and "No Delinquent Federal Debt".
- DO NOT PAY:** "IRS Tax Exempt Status" with the status "Site Unavailable - Try again later".
- EXCLUDED PARTIES:** "No Exclusion" with a green checkmark. Source: SAM.gov, Last Update: 09/13/2022.
- REPS & CERTS:** "Site Unavailable - Try again later".
- EXCLUDED FOREIGN ENTITIES:** "Site Unavailable - Try again later".
- FAPIS:** A green checkmark icon.

Annotations (red boxes with arrows) provide additional context:

- An arrow points from the "Site Unavailable - Try again later" status in the "DO NOT PAY" section to a box stating: "If DNP does not provide a response, this field will have a gray indicator and a 'Site Unavailable - Try again later' status."
- An arrow points from the "Site Unavailable - Try again later" status in the "REPS & CERTS" section to a box stating: "If this is gray, then the overall Compliance indicators do not consider it when determining whether to show as green or yellow".

Figure 8: Could not connect to the Do Not Pay Excluded Foreign Entities list