



July 2026

Compliance Considerations – 2 CFR 200

Agenda

- 1 2 CFR Part 200 - Common Compliance Issues
- 2 Proposed Updates to the Uniform Guidance
- 3 SAM.gov
- 4 Questions

I. Common Compliance Issues



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Award Compliance Requirements

Coordinator
Instructions

Recipient's/
Subrecipient's
Policies & Procedures

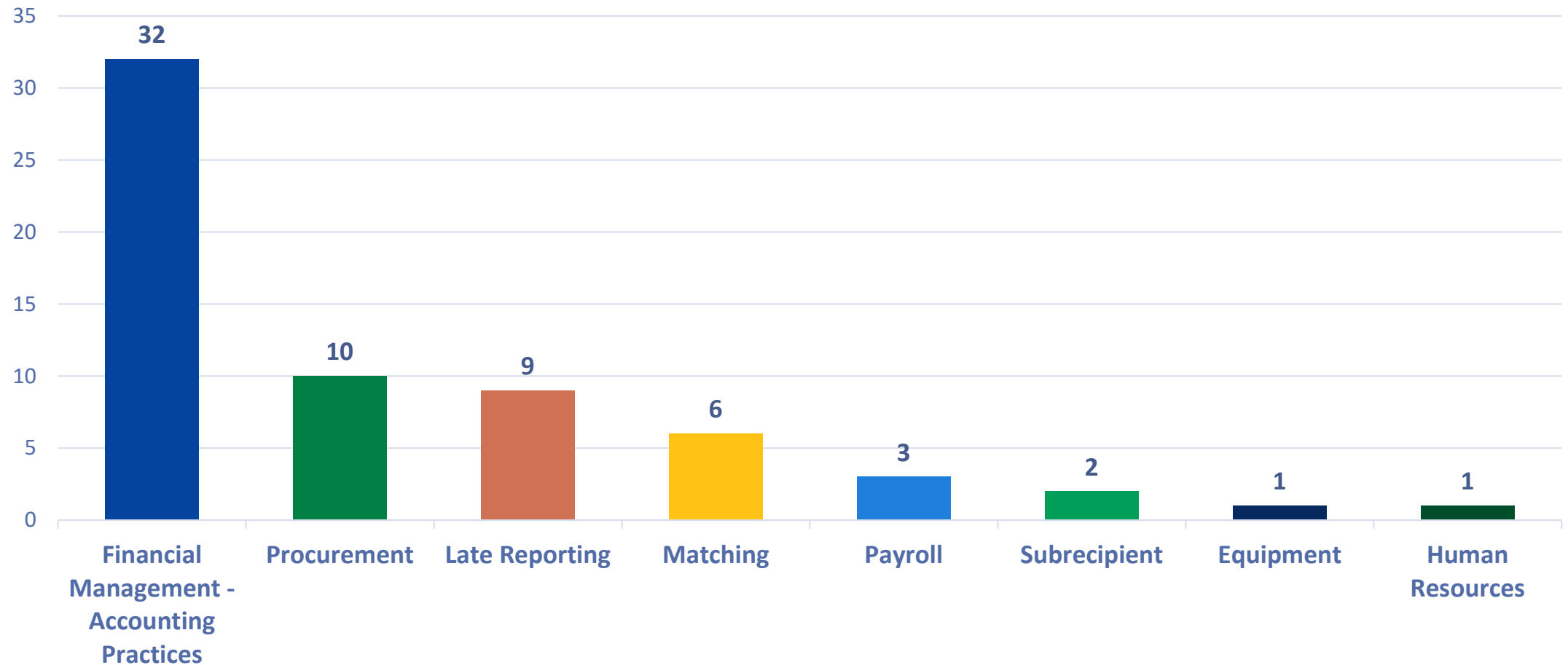
Proposal/ARC
Approval

Grant Agreement

Federal Laws, Rules, Regs (e.g. ARDA, Uniform
Guidance, BABA)

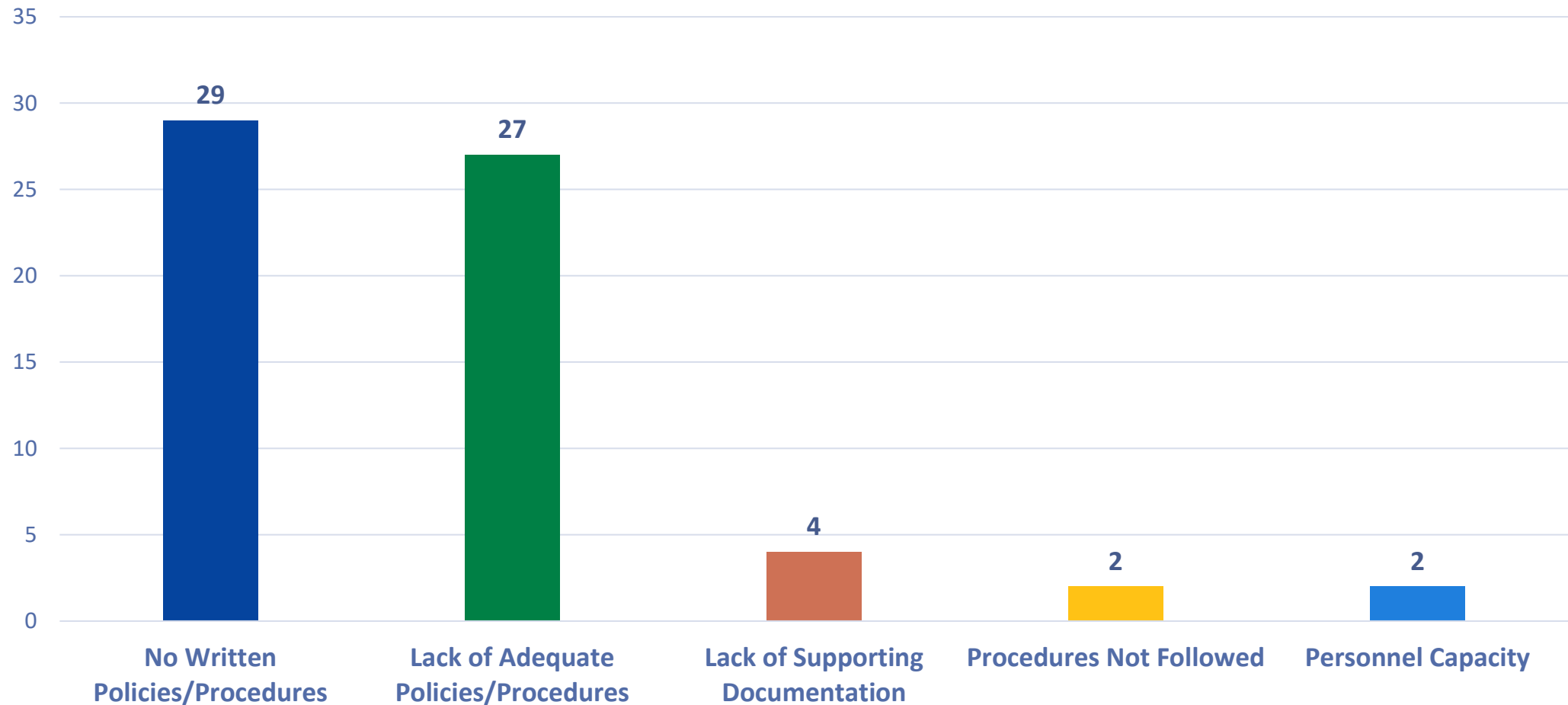
Audit Statistics: Recommendations (FY25)

Common Problem Areas Causing Recommendations



Audit Statistics: Recommendations (FY25)

Root Cause



False Claims Act

What is the False Claims Act?

31 U.S.C. §§ 3729 - 3733

- The False Claims Act is a whistleblower law that allows private citizens or the government to bring lawsuits against organizations and individuals who “defraud” the government
- This includes **knowingly making false statements, or submitting false records, in order to receive payments from the Federal government**
- Private citizens can receive money damages in successful FCA litigation, motivating whistleblower claims
- The DOJ has created a Civil Rights Fraud division to investigate and pursue litigation against any recipient of federal funds that knowingly violates civil rights laws, using the False Claims Act.

False Claims Act Litigation

- In FY 2025 DOJ and private citizens filed 1,698 new cases, establishing an all-time high
- In FY 2025, settlements and judgments under the FCA resulted in monetary recoveries totaling \$6.8 billion, more than double FY 2024

False Claims Act Litigation

- On April 10, 2026 IBM agreed to pay over \$17MM to resolve allegations that it violated the FCA by failing to comply with anti-discrimination requirements in IBM's federal contracts.
 - The government alleged that IBM took race, color, national origin, or sex into account when making employment decisions
- On June 15, 2026 defense contractor LOGZONE entered into a settlement agreement for over \$500K to resolve FCA claims that they knowingly submitted claims for payment between 2021 and 2025 despite failing to fully comply with required cybersecurity controls.

Certifications

- The ARC grant agreement along with a variety of fields within the Pathways system require the Grantee's Authorized Representative to certify compliance with relevant laws and make other representations to ARC.
- This is why it is important that the Authorized Representative is the only person who can access their account in the Pathways system and why someone who is not the Authorized Representative cannot certify items in Pathways
- SAM.gov also requires registrants to certify compliance with certain laws

Takeaways

- There are legal, contractual obligations that the Grantee is bound by.
- Legal consequences can attach if the Grantee is in breach of any of their contractual obligations under the Grant Agreement.



- The Authorized Representative needs to certify compliance – no other person or entity should certify reports, amendments, or the grant agreement.
- Certifications must be true and accurate when made. Knowingly making a false certification could result in investigation of a “false claim” under FCA by DOJ

I. Common Compliance Issues



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Financial Management

What is your financial management system?

2 CFR 200.302

The backbone of grant performance.

It must include:

- Comprehensive, written policies and procedures
- Adequate internal controls
- Proper accounting procedures (in line with GAAP)
- Accurate and timely financial reporting
- Costs matching the approved budget
- Supporting documentation for every cost
- Allowable costs

Financial Management Components



Common Audit Findings Related to Financial Management



Inadequate/no written policies and procedures for financial management



General Ledger, cost documentation and/or financial reporting do not match



Insufficient internal controls



Cost documentation missing/not matching

Examples of Records Requested

- Policies and procedures related to financial management
- Payroll records, employee timecards
- Documentation to support matching funds
- General ledger, journal entries, cash disbursements, cash receipts journal, chart of accounts
- Purchase orders and invoices
- Travel expense claims and receipts
- Cost methodologies
- Performance measurement methodology and indicators

Sources Reviewed

- Uniform Guidance
- Applicable federal statutes and regulations
- ARC grant agreement
- MOU and PDP between ARC and RSBA
- RSBA and ARC Project Coordinator Instructions
- Project proposal and ARC approval



Q:

- The grantee is a low-capacity organization without a large staff.
- The Director knows what the internal rules are for procurement – does the organization still need a written policy?



A:

- **Yes**, 2 CFR 200.318 requires the entity to use documented procurement procedures consistent with State, local, and tribal laws. The Director must implement a written policy, ratified through the proper method.



Best Practices

- Grantees should ensure they have financial management and other internal controls, policies, and procedures in place **prior** to applying for/receiving federal financial assistance
- ARC does not review or approve applicant policies/procedures
- LDDs should encourage all applicants to create and maintain effective policies and procedures before applying for ARC grants



Overview - Required Written Policies and Procedures

Please note: this checklist is not a comprehensive list of all documentation requirements under [2 CFR Part 200](#). Recipients and subrecipients are responsible for reviewing the Uniform Guidance and other applicable authorities and complying with all requirements therein. Not all policies and procedures listed here may be applicable to every project. Please note that federal and state basic agencies may impose additional requirements. There may be other applicable documentation requirements beyond this checklist, such as maintaining documentation of costs. This checklist does not constitute legal advice. Please consult your legal counsel for any questions regarding development and implementation within your organization.

Definitions:

Policies – guiding principles that lead an organization to run effectively. Policies are developed and ratified by the governing body or leadership personnel of an organization and direct activities designed to achieve the organization's goals.

Procedures – explanations that provide details and instructions of how to implement specific policies.

Topics that require written policies and procedures:

- ☐ Conflicts of interest ([§200.112](#)) ([ARC Code §8.3](#))
- ☐ Financial management ([§200.302](#))
 - ☐ Allowable costs ([§200.302\(b\)\(7\)](#)) ([§200.403](#)) ([§200.404](#)) ([§200.405](#))
 - ☐ Internal Controls ([§200.303](#))
- ☐ Equipment ([§200.313](#))
- ☐ Procurement ([§200.317-327](#))
- ☐ Subawards ([§200.332](#)) ([§200.334](#))
- ☐ Personnel ([§200.430](#)) ([§200.431](#)) ([§200.437](#)) ([§200.464](#))
- ☐ Insurance ([§200.447](#))
- ☐ Participant support costs ([§200.456](#))
- ☐ Scholarships, student aid costs, and tuition remissions ([§200.466](#))
- ☐ Travel costs ([§200.475](#))

August 2025

Found here:

<https://www.arc.gov/resource/policies-and-procedures-checklist/>



Procurement



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Updated Procurement Thresholds

Effective October 1, 2025, the procurement thresholds in the Uniform Guidance changed:

Micro-purchase

- Was under \$10,000 – **now under \$15,000**

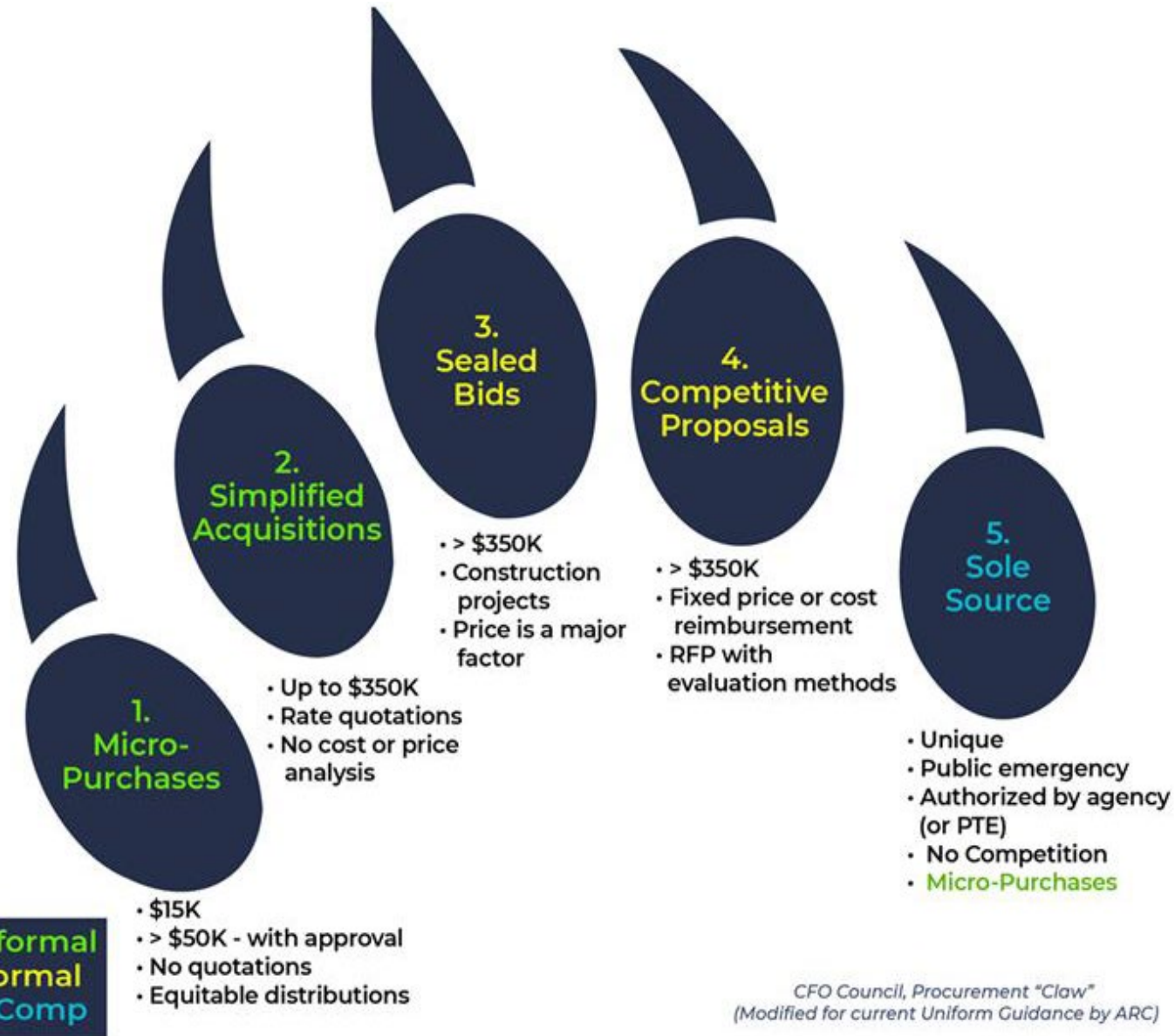
Simplified Acquisition

- Was up to \$250,000 – **now up to \$350,000**

Formal Procurement

- Was over \$250,000 – **now over \$350,000**

Procurement Methods



Real or Apparent Conflicts

No employee, officer, agent, or board member with a **real or apparent** conflict of interest may participate in the selection, award, or administration of a contract supported by the Federal award.

Financial Interest or Personal Benefit

A conflict of interest includes when the employee, officer, agent, or board member, any member of their immediate family, their partner, or an organization that employs or is about to employ any of the parties indicated herein, has a **financial or other interest in or a tangible personal benefit** from an entity considered for a contract.

Competition - 2 CFR 200.319(c)

Examples of situations that may restrict competition include:

1. Placing unreasonable requirements on firms for them to qualify to do business;
2. Requiring unnecessary experience and excessive bonding;
3. Noncompetitive pricing practices between firms or between affiliated companies;
4. Noncompetitive contracts to consultants that are on retainer contracts;
- 5. Organizational conflicts of interest;**
6. Specifying only a brand name product instead of allowing an equal product to be offered and describing the performance or other relevant requirements of the procurement; and
7. Any arbitrary action in the procurement process.



Q:

- The grantee has been working with a contractor to design the project space for construction.
- The grantee wants the same contractor to complete the construction phase too, because the contractor knows the space well. Is this okay?



A:

- **No**, to eliminate unfair competitive advantage, contractors that develop or draft specifications, requirements, statements of work, or invitations for bids must be excluded from competing on those procurements. 2 CFR 200.318(b)



Q:

- The grantee has already chosen a contractor before the period of performance begins and includes them by name in their budget. Is this okay?



A:

- **It depends,** this is acceptable if the contractor was procured using the proper procurement method (even though it was before the application was submitted).
- This is not acceptable if the contractor was not properly procured/documentated.
- Costs still can only be incurred during the period of performance

Property



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Property Standards

Title

Real property and equipment purchased with federal funds has a federal interest.

Title to this property is conditional, meaning it comes with strings attached.

Property must be used for project purposes until no longer needed.

In the meantime, the recipient or subrecipient cannot encumber the title or dispose of the property without Federal approval.

ARC only requires a Notice of Federal Interest for real property and equipment with ARC funds of >\$250K.

Property Standards

Equipment Management

Minimum Equipment Management Requirements:

- Property records including:
 1. Description of the property,
 2. Identification number; source of funding (including FAIN);
 3. Who holds title;
 4. Acquisition date;
 5. Cost of the property;
 6. Percentage of Federal participation in the project costs;
 7. The location, use and condition of the property; and
 8. Any ultimate disposition data including the date of disposal and sale price of the property
- Physical inventory at least once every 2 years
- Control system against loss, damage or theft
- Adequate maintenance procedures (200.313(d))

Disposing of the Federal Interest

No longer needed for project purposes.



Grantee reaches out to ARC with property identification, FMV and proposed course of action: retain (could re-use for economic development in the Region), sale or transfer.



ARC confirms whether disposal requires gov't refund (% of initial federal contribution) or can be re-used.
ARC's federal interest does not expire.



Best Practices

- Grantees that determine they no longer need ARC sponsored property should reach out to their ARC project coordinator **early** to discuss potential future uses – plan ahead! It can take time to come to a proposal that works for ARC and for the Grantee
- Repurposed equipment **must** be used for a public purpose
- Supplies do not require the approval of ARC to be disposed of or repurposed
- Equipment/real property purchased with matching funds do not require ARC approval to be repurposed

Match



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Match (“Cost Sharing”) Allowability

2 CFR 200.306

Match is allowable when:

1. Match costs were contributed toward the project, as demonstrated by cost documentation/valuation records.
2. Same costs were not used as match for any other Federal award.
3. Costs are necessary and reasonable for the Federal award project.
4. Allowable under Subpart E “Cost Principles.”
5. Match is approved by ARC.
6. Conforms to the Uniform Guidance and award terms and conditions.

Cash Match

2 CFR 200.306

- Cash matches may be drawn from grantees' own funds or cash donations from third parties.
- A cash match contribution is an actual cash contribution.
- Loans are also counted as cash.
- Grant awards from other federal, state, or local governmental entities and other forms of governmental financial assistance.

In-Kind Match

2 CFR 200.306

Select Match Sources

Services performed free of charge or at a reduced rate

Indirect costs

Supplies

Equipment, buildings or land

Valuation

Amount must be reasonable for the grantee's organization or the relevant labor market

Unrecovered indirect costs from either the de minimis or the negotiated rate

Cannot exceed FMV

Value depends on factors: Long-term vs. temporary use, purpose/scope of award, titles vs. loan, space vs. entire property, FMV at time of donation



Q:

- The grantee reports equipment costs to ARC, which are expended from matching funds. The grantee doesn't keep detailed records of costs incurred from matching funds, but reports accurate amounts to ARC. Is this okay?



A:

- **No**, non-ARC match costs incurred during the grant period require proper documentation and must be allowable.
- The grantee must keep documentation of all purchases (receipts, paid invoices, procurement methods).



Best Practices

- Grantees should treat matching funds with the same care they treat federal funds
- For in-kind match, Grantees should be prepared to explain how they determined the value of the match
 - Examples:
 - Property – appraisal, lease agreement, purchase agreement
 - Personnel time – typical salary of the employee
 - Equipment – fair market value

Indirect Cost Rates

Indirect Costs - Rate

- If the applicant is using the de minimis (15%) indirect cost rate, no additional documentation is needed
- If the applicant is using a rate above 15% ask:
 - 1) Is it a State/Local Government or Indian Tribe?
 - 2) Is it another type of entity?

Indirect Costs - Rate

- 1) If the applicant is a State/Local Government or Indian Tribe:
 - Confirm whether they receive over \$35 million in direct federal funding during its fiscal year
 - If **NO** – they must have a documented indirect cost rate proposal to support their use of the proposed indirect cost rate
 - If **YES** – they must submit their indirect cost rate proposal to its cognizant agency (ARC is not a cognizant agency) and provide the approved plan to ARC

Indirect Costs - Rate

- 2) If the applicant is another type of entity (nongovernmental/tribal):
 - They must have a Negotiated Indirect Cost Rate Agreement (NICRA) approved by a cognizant agency
 - Check to confirm that the NICRA is active/not expired
 - Check to confirm that the correct rate has been applied to the project based on the NICRA (i.e. the cost categories, amount, etc.)

Indirect Costs - MTDC

MTDC = Modified Total Direct Cost

- **Includes:** all direct salaries and wages, applicable fringe benefits, materials and supplies, services, travel, and up to the first \$50,000 of each subaward
- **Excludes:** equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, participant support costs, and the portion of each subaward in excess of \$50,000

Proposed Rate: 18%

	Budget Object Class	Amount Requested	Allowed in the MTDC base
✓	Salaries	\$80,000	\$80,000
✓	Fringe Benefits:	\$15,000	\$15,000
✓	Supplies:	\$5,000	\$5,000
✓	Subawards:		
	XYB	\$55,000	\$50,000
	YBX	\$25,000	\$25,000
✗	Capital Equipment	\$10,000	
✗	Participant Support Costs	\$5,000	
	Total Direct Costs	\$195,000	

MTDC = Salaries + fringe benefits + supplies + up to the first \$50,000 of each subaward

$\$80,000 + \$15,000 + \$5,000 + \$50,000 + \$25,000 = \$175,000$

MTDC Base

Allowable Indirect Costs = $\$175,000 \times 18\% = \$31,500$ (IDC)

Indirect Costs

Unrecovered Indirect Costs

- **Unrecovered Indirect Costs** = the difference between the amount charged to the Federal award and the amount which could have been charged to the Federal award under the recipient's or subrecipient's approved indirect cost rate.
- Note – if you have a NICRA, you should calculate your indirect costs using the cost base outlined in the NICRA, but can claim less than the full % and put the rest towards match
- i.e. – NICRA permits 35% indirect cost rate calculated on *supplies, salaries, fringe, and the first \$10K of each subaward*. The applicant elects to use a 15% indirect cost rate and use the unrecovered indirect costs as match.
 - Step 1) Calculate indirect cost rate as outlined in the NICRA (supplies, salary, fringe, \$10K subawards)
 - Step 2) Include 15% of the calculated cost base in the ARC budget
 - Step 3) Include 20% of the calculated cost base as matching funds

Build America, Buy America (BABA)

BABA Preference for Infrastructure Projects

2 CFR 184

- Applicability:
 - Federal awards for infrastructure projects in the U.S.
 - with iron, steel, manufactured products, and construction materials incorporated into the project
 - must be produced in the U.S.
- Buy America Preference must be included in all subawards, contracts, and purchase orders for the work performed, or products supplied under the Federal award.
- Waivers
 1. Public interest waiver
 2. Nonavailability waiver
 3. Unreasonable cost waiver

ARC Updated BABA Guidance

- New resources including a Grantee Manual and RSBA Manual will be available on ARC's website starting on **August 1, 2026**
- This includes guidance written in plain language, examples, and templates for grantees to use when planning and implementing BABA compliance in an infrastructure project
- **[ARC.gov/BABA](https://arc.gov/BABA)**

II. Proposed Updates to The Uniform Guidance

Proposed Revisions to Guidance for Federal Financial Assistance (2 CFR 200) - *Proposed Timeline*

- **May 29** - OMB released the proposed rule in the Federal Register. Public comment period is open.
- **July 13** – Public comment period closes. OMB responds to public comments and releases their responses.
- **October 1** – Rule becomes final. Is implemented at agency level.

<https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>

Proposed Revisions to Guidance for Federal Financial Assistance (2 CFR 200) - *Form*

- Uniform Guidance → Uniform Grants Regulation (UGR)
- Current: OMB provides guidance in 2 CFR 200, and agencies later adopt the guidance into their agencies' existing regulations.
- Proposed: Once the proposed OMB rule becomes final, it would immediately be adopted as a regulation for agencies. Removing the second step of guidance adopted in other regulations.
 - Rationale: Agency rulemakings to implement uniform guidance / future amendments could result in staggered and inconsistent effective dates, confusing stakeholders.

OMB's stated objectives: transparency, accountability, and reduced burden

01

Improve transparency, accountability & oversight

Ensure Federal funds advance lawful, authorized purposes and serve the American public as intended.

02

Clarify the regulatory status of 2 CFR

Establish subtitle A as a binding OMB regulation so **requirements apply uniformly across agencies.**

03

Reduce unnecessary recipient burden

Streamline duplicative requirements and modernize references (e.g., SAM.gov) where consistent with oversight.

Executive Order 14332 and the oversight mandate

E.O. 14332, "Improving Oversight of Federal Grantmaking" (Aug. 7, 2025)

Directs OMB to revise 2 CFR to **strengthen agency oversight of discretionary awards, align awards with authorized purposes, and curb wasteful or unlawful spending.**

Growth of assistance has outpaced oversight

OMB asserts the scale, volume, and diversification of Federal financial assistance have expanded faster than the controls governing it since the 2014 Uniform Guidance.

Alignment with broader Executive Branch policy

The revisions implement administration priorities on lawful use of funds, merit, and accountability, paralleling controls long used in Federal procurement.

Why now — OMB's premise

- OMB has historically set assistance policy through Circulars and 2 CFR; the proposal converts policy into enforceable rule.
- Cited record of misuse and weak accountability between cited years motivates stronger controls.
- Single government-wide regulation is presented as the most direct route to consistent oversight.

Areas of Focus

- Increased agency oversight and pre-issuance review, additional risk review factors
- Fixed amount awards/subawards eliminated (cost-reimbursement vs. lump sum)
- Prohibits funding for unlawful DEI (aligned with E.O. 14332)
- Broader ability for agencies to terminate awards not aligned with agency priorities (termination for convenience)
- Increased controls for payment verification (E-Verify)
- Prohibition on discriminating against viewpoints in providing services for events



Best Practices

- Familiarize yourself with the proposed changes to the Uniform Guidance
 - You can find this on the Federal Register:
 - <https://www.federalregister.gov/documents/2026/05/29/2026-10817/regulation-for-federal-financial-assistance>
- Stay apprised of news/timeline for implementation (currently predicted for October 1, 2026)
- Review E.O. 14332, "Improving Oversight of Federal Grantmaking"
- Note: changes at agency level will not be implemented until the proposed regulation is approved

III. SAM.gov

UEI Requirements – 2 CFR 25

Recipients

- Full registration in SAM.gov
- Valid UEI

1st Tier Subrecipients

- ~~Full registration in SAM.gov~~
- Valid UEI

2nd Tier Subrecipients or Below

- ~~Full registration in SAM.gov~~
- ~~Valid UEI~~

No requirements

#1 Active Registration

**APPALACHIAN REGIONAL
COMMISSION**

Entity Information

● Active Registration

#2 FFA Representation

Entity Registration

Core Data

Business Information

Entity Types

Financial Information

Points of Contact

Assertions

Reps and Certs (FAR/DFARS)

Reps and Certs (Financial Assistance)

Exclusions

Responsibility / Qualification

FINANCIAL ASSISTANCE REPRESENTATION AND CERTIFICATION

The Grants Certifications are a common set of certifications and representations required by Federal statutes or regulations in accordance with the grants guidance under Title 2 of the Code of Federal Regulations (2 CFR 200.208 Certifications and Representations). Those non-Federal entities who intend to apply for, or are already recipients of Federal grants or agreements, must read and agree to the corresponding certifications and representations. Registrants who reply yes to the following questions are required to keep these certifications and representations current, accurate, and complete as part of their entity registration.

Does [ENTITY NAME] wish to apply for a Federal financial assistance project or program, or is [ENTITY NAME] currently the recipient of funding under any Federal financial assistance project or program?

YES

- (1) Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability to ensure proper planning, management and completion of any financial assistance project covered by this Certifications and Representations document (See 2 C.F.R. § 200.113 Mandatory disclosures, 2 C.F.R. § 200.214 Suspension and debarment, OMB Guidance A- 129, "Policies for Federal Credit Programs and Non-Tax Receivables");
- (2) Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives (See 2 C.F.R. § 200.302 Financial Management and 2 C.F.R. § 200.303 Internal controls);
- (3) Will disclose in writing any potential conflict of interest to the Federal awarding agency or pass through entity in accordance with applicable Federal awarding agency policy (See 2 C.F.R. § 200.112 Conflict of interest);
- (4) Will comply with all limitations imposed by annual appropriations acts;
- (5) Will comply with the U.S. Constitution, all Federal laws, and relevant Executive guidance in promoting the freedom of speech and religious liberty in the administration of federally-funded programs (See 2 C.F.R. § 200.300 Statutory and national policy requirements and 2 C.F.R. § 200.303 Internal controls);
- (6) Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and public policies governing financial assistance awards and any Federal financial assistance project covered by this certification document, including but not limited to:
 - (a) Trafficking Victims Protection Act (TVPA) of 2000, as amended, 22 U.S.C. § 7104(g);
 - (b) Drug Free Workplace, 41 U.S.C. § 8103;
 - (c) Protection from Reprisal of Disclosure of Certain Information, 41 U.S.C. § 4712;
 - (d) National Environmental Policy Act of 1969, as amended, 42 U.S.C. § 4321 et seq.;
 - (e) Universal Identifier and System for Award Management, 2 C.F.R part 25;
 - (f) Reporting Subaward and Executive Compensation Information, 2 C.F.R. part 170;
 - (g) OMB Guidelines to Agencies on Governmentwide Debarment and Suspension (Non-procurement), 2 C.F.R. part 180;
 - (h) Civil Actions for False Claims Act, 31 U.S.C. § 3730;
 - (i) False Claims Act, 31 U.S.C. § 3729, 18 U.S.C. §§ 287 and 1001;
 - (j) Program Fraud and Civil Remedies Act, 31 U.S.C. § 3801 et seq.;
 - (k) Lobbying Disclosure Act of 1995, 2 U.S.C. § 1601 et seq.;
 - (l) Title VI of the Civil Rights Act of 1964, 42 U.S.C. § 2000d et seq.;
 - (m) Title VIII of the Civil Rights Act of 1968, 42 U.S.C. § 3601 et seq.;
 - (n) Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. § 1681 et seq.;
 - (o) Section 504 of the Rehabilitation Act of 1973, as amended, 42 U.S.C. § 794; and.
 - (p) Age Discrimination Act of 1975, as amended, 42 U.S.C. § 6101 et seq.

Entity Registration

> Core Data

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Assertions

Reps and Certs (FAR/DFARS)

Reps and Certs (Financial Assistance)

Exclusions

Responsibility / Qualification

■ EXCLUSIONS

There may be instances when an individual or firm has the same or similar name as your search criteria, but is actually a different party. Therefore, it is important that you verify a potential match with the excluding agency identified in the exclusion's details. To confirm or obtain additional information, contact the federal agency that took the action against the listed party. Agency points of contact, including name and telephone number, may be found by navigating to the Agency Exclusion POCs page within Help.

Active Exclusions

There are no active exclusion records associated to this entity by its Unique Entity ID.

Inactive Exclusions

There are no inactive exclusion records associated to this entity by its Unique Entity ID.

■ PROCEEDINGS

This entity is not required to report whether it has been the subject of any criminal, civil, or administrative proceedings related to federal contracts or grants.

■ OTHER RESPONSIBILITY & INTEGRITY INFORMATION

There are no other responsibility information records associated to this entity by its Unique Entity ID.



Best Practices

- Before applying for a grant, applicants should confirm:
 - (1) they have an active UEI and full registration in SAM.gov
 - (2) they have provided ARC with a correct UEI for the entity that intends to be the grant recipient – the UEI provided will inform who the “Grantee” entity is in the grant agreement
 - (3) the applicant has answered “Yes” to the “Reps and Certs (Financial Assistance)” tab
 - (4) there are no exclusions on the entity’s SAM page
- This will help the processing of the grant application/potential grant agreement be issued smoothly

ARC's Grant Compliance Guide: A breakdown of 2 CFR 200

Grant Compliance Guide

[Funding Opportunities and Resources](#)

[Grantee Resource](#)

This guide serves as a compilation of the various laws, regulations, and other terms and conditions applicable to ARC grants. Grant recipients and subrecipients will especially find this useful as a primer for the management of federal grants. Applicants may also find this guide useful when applying for an ARC grant.

Questions about how to apply this guide to a particular ARC grant decision should be directed to a grants or legal professional, an [ARC State Program Manager](#), or an ARC Project Coordinator, as appropriate.

- 1. General Information
- 2. About ARC Grants
- 3. Match Funding
- 4. Period of Performance
- 5. Cost Principles
- 6. Allowability of Specific Items of Cost
- 7. Indirect Costs
- 8. Subrecipient Management and Monitoring

[https://www.arc.gov/
resource/grant-
compliance-guide/](https://www.arc.gov/resource/grant-compliance-guide/)



Questions?