

CFR 200 Compliance Checklist for Grant Management

1. General Requirements

- Understand CFR 200:** Review the full CFR 200 regulations (2 CFR Part 200) to ensure comprehensive understanding.
- Document Policies:** Develop and document policies aligned with the CFR 200 requirements (2 CFR § 200.303).

2. Financial Management

- Maintain Financial Records:** Keep accurate financial records as required (2 CFR § 200.302).
- Accounting System:** Implement an accounting system that meets standards for accountability and transparency (2 CFR § 200.302(b)).
- Cost Allocation:** Follow guidelines for cost allocation to ensure proper distribution (2 CFR § 200.405).

3. Internal Controls

- Segregation of Duties:** Implement segregation of duties to prevent fraud and conflicts of interest (2 CFR § 200.303).
- Regular Reconciliations:** Conduct regular reconciliations of financial statements (2 CFR § 200.303).
- Monitoring Controls:** Establish monitoring controls for compliance (2 CFR § 200.303).

4. Grant Reporting and Documentation

- Submit Reports:** Submit required financial and performance reports on time (2 CFR § 200.328).
- Maintain Documentation:** Retain all grant-related documentation for the required retention period (2 CFR § 200.333).

5. Procurement and Subawards

- Procurement Procedures:** Follow procurement standards for purchasing goods and services (2 CFR § 200.318 - § 200.326).

- Subawards Management:** Ensure subawards comply with CFR 200 requirements, including monitoring (2 CFR § 200.330 - § 200.332).

6. Audit Requirements

- Single Audit Compliance:** Conduct Single Audits as required if expenditures exceed the threshold (2 CFR § 200.501).
- Audit Records:** Maintain records of audit reports and address findings (2 CFR § 200.512).

7. Cost Principles

- Allowable Costs:** Verify that costs are allowable, reasonable, and allocable (2 CFR § 200.403 - § 200.405).
- Unallowable Costs:** Exclude unallowable costs from grant expenditures (2 CFR § 200.420).

8. Administrative Requirements

- Records Access:** Ensure records are accessible to federal agencies and auditors (2 CFR § 200.336).
- Compliance with Federal Standards:** Adhere to non-discrimination and environmental regulations (2 CFR § 200.321).

9. Training and Capacity Building

- Staff Training:** Provide training on CFR 200 compliance and grant management (2 CFR § 200.430).
- Ongoing Updates:** Keep current with changes to CFR 200 regulations and update policies (2 CFR § 200.303).

10. Program Performance

- Performance Measurement:** Establish performance indicators to assess program effectiveness (2 CFR § 200.301).
- Corrective Actions:** Implement corrective actions if performance goals are not met (2 CFR § 200.328).