

## What RULES do I need to follow?

For federal grant programs, recipients have to abide by the laws, regulations, and policies set forth in (listed in general order of precedence):

- Authorizing legislation for grant program
- Generally applicable legislation/“National Policy Requirements” (Civil Rights, Labor Standards, Lobbying, Procurement Procedures, NEPA, etc.)
- Uniform Administrative Requirements (see table below)
- Cost Principles (see table below)
- Audit Requirements (see table below)
- Grant Agreement Terms and Conditions
- Agency Policy (normally does not apply to recipients)

### **Federal Grant Regulations by Entity Type:**

Regulation	Type of Entity *			
	Non-profit	State, Local, Indian Tribal Governments	Educational Institution	Commercial
Uniform Administrative Requirements	2 CFR 215 (formerly A-110); USFWS' implementation of 2 CFR 215 can be found at 43 CFR 12 Subpart F	OMB Circular A-102; USFWS' implementation of A-110 can be found at 43 CFR 12 Subpart C	2 CFR 215 (formerly A-110); USFWS' implementation of 2 CFR 215 can be found at 43 CFR 12 Subpart F	Varies [USFWS usually states 43 CFR 12 Subpart F is applicable in grant's special conditions]
Cost Principles	2 CFR 230  (formerly OMB Circular A-122)	2 CFR 225  (formerly OMB Circular A-87)	2 CFR 220  (formerly OMB Circular A-21)	Federal Acquisition Regulation (FAR) codified at 48 CFR 31.2
Audit Requirements	OMB Circular A-133	OMB Circular A-133	OMB Circular A-133	Varies – generally meet A-133 requirements or Government Auditing Standards

\* Recipients and subrecipients adhere to the regulations appropriate for their entity type and not that of the entity they receive the money from (e.g., if the USFWS awards a Multistate Grant to a state, who in turn subawards the money to a non-profit, then the non-profit adheres to 43 CFR 12 Subpart F and OMB Circular A-122, while the state adheres to 43 CFR 12 Subpart C and OMB Circular A-87). Vendors, which are entities that provide goods or services that are ancillary to the federal grant (see A-133 § \_\_.210 for subrecipient versus vendor determination), are not specifically subject to compliance requirements, however, recipients are explicitly required to ensure compliance for all vendor transactions (thus, it's a good idea to include compliance requirements in vendor contracts).