

Appendix D: Procurement Crosswalk

2 CFR 200 Requirement vs. State Policy Requirement Crosswalk

2 CFR 200 Reference	Requirement	State Policy Alternative or specific CDBG regulatory reference	Requirement
Subpart A 200.0 – 200.99	Acronyms and Definitions	Adopted by State	
Subpart B 200.100 – 200.113	General Provisions	Adopted by State	
Subpart C 200.200 – 200.201	Purpose and Use of Grant Agreements	Not Applicable to State	
Subpart C 200.202	Requirements to provide public notice	Applicable to State	
Subpart C 200.203 – 200.206	Notices of funding opportunities, federal agency review, standard applications	Not Applicable to State	
Subpart C 200.207	Specific Conditions	Applicable to State, made applicable by 24 CFR 570.485(d)	
Subpart C 200.208 – 200.213	Certifications, etc.	Not Applicable to State	
Subpart D 2 CFR 200.300	Statutory and national policy requirements	Adopted by State	
Subpart D 2 CFR 200.301	Performance Measurements	Policy and Procedure Manual	Performance and financial information collected via IowaGrants. Performance goals, reporting frequency, indicators and milestones in Grant Contracts and IowaGrants.
Subpart D 2 CFR 200.302 - 304	Financial Management, Bonds, Internal controls	Adopted by State	

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Subpart D 2 CFR 200.305	Payment	Policy and Procedure Manual	Grant recipient's payment made on a reimbursement basis only. Request of Payment collected via IowaGrants. State follows CMIA agreement and default procedures. State has criteria to withhold payment for non-compliance as necessary.
Subpart D 2 CFR 200.306	Cost Sharing or Matching	Adopted by State	
Subpart D 2 CFR 200.307	Program Income	24 CFR 570.489(e) & (f)	Definition, program income paid to the state, and program income retained by the unit of local government
Subpart D 2 CFR 200.308 – 200.311	Revision of Budget and Program Plans Period of Performance Insurance Coverage	Adopted by State	
Subpart D 2 CFR 200.312	Federally Owned and Exempt Property	Not Applicable	
Subpart D 2 CFR 200.313 – 200.316	Equipment, Supplies, Intangible property, property trust relationship	Adopted by State	
Subpart D 2 CFR 200.317	Procurement by States	IAC 11.117.1(2) & 11.118.2(8A) 24 CFR 570.489 (g)	The department and agencies shall follow procurement policies regardless of the funding source supporting the procurement.
Subpart D 2 CFR 200.318	General Procurement Standards	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	

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Subpart D 2 CFR 200.319	Competition	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.320	Methods of Procurement to be followed	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
2 CFR 200.322	Procurement of Recovered Materials	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.323	Contract cost and price	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.324	Federal Awarding Agency or Pass-through entity review	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.325	Bonding requirements	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.326	Contract Provisions	Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy	
Subpart D 2 CFR 200.327	Financial Reporting	Policy and Procedure Manual	Performance and financial information collected via IowaGrants. Performance goals, reporting frequency, indicators and milestones in Grant Contracts and IowaGrants.
Subpart D 2 CFR 200.328	Monitoring and Reporting Program Performance	Policy and Procedure Manual	Monitoring and reporting by grantees

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Subpart D 2 CFR 200.329	Reporting on Real Property	Policy and Procedure Manual	Method and frequency of reporting on the status of real property in which the federal government retains an interest.
Subpart D 2 CFR 200.330 – 200.332	Subrecipient and Contractor Determinations, Requirements for pass through entities, Fixed amount subawards,	Applicable to state. Applicable by 24 CFR 570.489 (m)	
Subpart D 2 CFR 200.333	Retention requirements for records	Adopted by state also 24 CFR 570.490 record keeping requirements	
Subpart D 2 CFR 200.333	Request for transfer of records	Adopted by state also 24 CFR 570.490 record keeping requirements	
Subpart D 2 CFR 200.337 – 2 CFR 200.345	Restriction on public access to records, Remedies for noncompliance Termination, Notification of termination requirement, Opportunities to object, hearings and appeals, Effects of suspension and termination, Close-out, Post-closeout adjustments and continuing responsibilities, and collections of amounts due	Adopted by state. Close-out with subrecipients in accordance with 24 CFR 470.489(i) are outlined in the Policy and Procedure manual.	
Subpart E 2 CFR 200.402 – 200.406	Composition of costs, factors affecting allowability of costs, reasonable costs, allocable costs, applicable credits	Adopted by State	

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Subpart E 2 CFR 200.407	Prior written approval	24 CFR 570.489(P)	All cost items described in 2 CFR part 200, subpart E, that require Federal agency approval are allowable without prior approval of HUD, to the extent that they otherwise comply with the requirements of 2 CFR part 200, subpart E, and are otherwise eligible, except for the following: (1) Depreciation methods for fixed assets shall not be changed without the express approval of the cognizant Federal agency (2 CFR 200.436). (2) Fines, penalties, damages, and other settlements are unallowable costs to the CDBG program (2 CFR 200.441). (3) Costs of housing (e.g., depreciation, maintenance, utilities, furnishings, rent), housing allowances, and personal living expenses (goods or services for personal use) regardless of whether reported as taxable income to the employees (2 CFR 200.445). (4) Organization costs (2 CFR 200.455).
Subpart E 2 CFR 200.408 – 200.475	Remainder of Subpart E cost principles: Direct and Indirect Costs, Special considerations, general provisions for selected items of Cost	Adopted by state, with exception to those issues that require prior written approval noted above.	
Subpart F 2 CFR 200.500 – 521	Audit Requirements	Adopted by state	

Appendix II to Part 200 – Contract Provisions

2 CRF 200 Reference	Requirement	State Policy Alternative or specific CDBG regulatory reference	Requirement
Appendix II (B)	All contracts in excess of \$10,000 must address termination for cause and for convenience	IAC 11.119.4(4)	IEDA contracts address through Termination clause(s) provisions. Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy
Appendix II (C)	Equal Employment Opportunity	IAC11.121.1; 216 and; section 19B.7	IEDA contracts address through Compliance with EEO/AA Provisions. Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy
Appendix II (D)	Davis-Bacon Act, as amended (40 U.S.C. 3141-3148).		IEDA will not be awarding construction contracts. Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy
Appendix II (E)	Contract Work Hours and Safety Standards Act (40 U.S.C. 3701-3708). Where applicable, all contracts awarded by the non-Federal entity in excess of \$100,000 that involve the employment of mechanics or laborers		IEDA will not be awarding contracts in excess of \$100,000 that involve the employment of mechanics or laborers and compliance with 40 U.S.C. 3702 and 3704, as supplemented by Department of Labor regulations (29 CFR Part 5). Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy
Appendix II (F)	Rights to Inventions Made Under a Contract or Agreement.		IEDA contracts address through Federal Government Rights in an attachment for Additional Requirements for Federally-funded Agreements.

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Appendix II (G)	Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended—Contracts and subgrants of amounts in excess of \$150,000 must contain a provision that requires the non-Federal award to agree to comply with all applicable standards		<p>Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy</p> <p>IEDA does not anticipate itself awarding of procurement contracts excess of \$150,000. However, IEDA includes Clean Air Act (42 U.S.C. 7401-7671q.) and the Federal Water Pollution Control Act (33 U.S.C. 1251-1387), as amended in an attachment for Additional Requirements for Federally-funded Agreements in all agreements</p> <p>Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy</p>
Appendix II (H)	Mandatory standards and policies relating to energy efficiency		<p>Currently the State of Iowa does not have a state energy plan that relate to energy efficient guidelines. However, IEDA uses the green streets criteria as a guideline for all construction grants.</p> <p>Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy</p>
Appendix II (I)	Debarment and Suspension (Executive Orders 12549 and 12689)	IAC 117.18(8A)	<p>IEDA: Formal Request for Proposals bidders are required to sign a certification the contractor nor any of its principals: (a) are presently or have been debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by a Federal Agency or State Agency; (b) have within a three year period preceding this Proposal been convicted of, or had a civil judgment rendered against them for commission of fraud, a criminal offense in connection with obtaining, attempting to obtain, or performing a public (federal, state, or local) transaction or contract under a public transaction, violation of antitrust statutes; commission of embezzlement, theft, forgery, falsification or destruction of records, making false statements, or receiving stolen property; (c) are presently</p>

			<p>indicted for or criminally or civilly charged by a government entity (federal, state, or local) with the commission of any of the offenses enumerated in (b) of this certification; and (d) have not within a three year period preceding this Proposal had one or more public transactions (federal, state, or local) terminated for cause.</p> <p>IEDA and all sub-recipients check the SAM database before contract award.</p> <p>Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy</p>
Appendix II (J)	Byrd Anti-Lobbying Amendment (31 U.S.C. 1352)—Contractors that apply or bid for an award exceeding \$100,000 must file the required certification.		<p>IEDA contracts address through Certification Regarding Government-Wide Restriction on Lobbying in an attachment for Additional Requirements for Federally-funded Agreements.</p> <p>Sub-recipients only: Community Development Block Grant Disaster Recovery Recipients Procurement Policy</p>