

**Snohomish County Early Head Start**

**Application: One-time Supplemental Funds for Nutrition and Healthy Eating for Head Start Children and Families**

**ACF-OHS-PI-25-02**

<b>SECTION I. Program Design and Approach to Service Delivery</b>	
Sub-section A: Goals	
Program Goals, Measurable Objectives, and Expected Outcomes	2
Sub-section B: Service Delivery	
1. Needs of Children and Families	4
2. Proposed Projects	5
<b>SECTION II. Budget Narrative</b>	
1. Narrative: Costs by Object Class Budget Category	8
2. Source of Non-Federal Match	9
<b>SECTION III. References</b>	11

## SECTION I: PROGRAM DESIGN AND APPROACH TO SERVICE DELIVERY

### I. Program Goals, Measurable Objectives and Expected Outcomes

**A. Goal 1:** Snohomish County Early Head Start (EHS) Infant Toddler Specialists will be confident in their ability to support pregnant clients and families with newborns to understand the multiple benefits of breastfeeding. Should families choose to breastfeed their child, they will be knowledgeable of and utilize proven strategies and approaches to support successful breastfeeding.

1. Program Action/Measurable Objectives:

Develop and implement a comprehensive professional development series focused upon supporting breastfeeding women, comprised of:

- a. Breastfeeding Counselor Training Certification;
- b. Breastfeeding in Early Learning Settings course;
- c. Demonstration of increased skills through observations, reflective supervision conversations, and family report; and
- d. Consistent inclusion of breastfeeding in home visit planning as appropriate.

2. Expected Outcomes and Tools/Methods for Tracking Progress:

By the end of the project year, Infant Toddler Specialists will have successfully completed breastfeeding training and are consistently applying their knowledge during home visits and work with families. Progress will be measured through:

- a. Home Visit content as collected in ChildPlus;
- b. ITS report in individual and group supervision; and
- c. Family report in annual satisfaction survey.

**B. Goal 2:** Snohomish County EHS will strengthen supports provided to breastfeeding mothers to increase participation in socialization events.

Program Action/Measurable Objectives:

Develop and utilize breastfeeding support “kits” for socializations comprised of:

- a. Private space for nursing and/or pumping parents;
- b. Nursing pillows with waterproof liner and washable covers;
- c. Breastmilk storage bags;
- d. Small cooler with icepack; and
- e. Bench glider rocker.

Expected Outcomes and Tools/Methods for Tracking Progress:

Participation of breastfeeding and pumping mothers in twice-monthly socializations will increase as evidenced by participation logs and family report.

**C. Goal 3:** Snohomish County EHS Staff will be trained to implement nutrition education curricula, with supporting nutrition and physical activity information, during home visits with families to increase family understanding of healthy eating



practices for themselves and their child and to utilize strategies for incorporating fruits and vegetables into their child's diet.

1. Program Action/Measurable Objectives:

Partner with families to utilize the Harvest for Healthy Kids curriculum and supplemental nutrition information during home visits to promote parental child nutrition knowledge and expand family exposure to and incorporation of fresh produce in their diets. Activities include:

- a. Introduction and exploration of Produce of the Month (in season);
- b. Discussion regarding ways to prepare produce, including family-friendly recipes;
- c. Utilization of age-specific supplemental family friendly nutrition information to address specific needs, i.e. toddlers, picky eaters, cooking with children, family-style meals, etc.; and
- d. Snohomish County EHS staff will participate in professional development opportunities focusing on nutrition and physical activity in early childhood.

2. Expected Outcomes and Tools/Methods for Tracking Progress:

By the end of the project year, families enrolled in Snohomish County Early Head Start will have shown an increase in the inclusion of vegetables and fruit into family meals. Progress will be evaluated through:

- a. Ongoing reporting by families in home visits; and
- b. Pre-post survey results.

**D. Goal 4:** Snohomish County EHS will provide enrolled families with parent education opportunities to learn to prepare nutritious, delicious meals for the family using economical and easily accessible ingredients.

1. Program Action/Measurable Objectives:

- a. Partner with registered dietitians to provide virtual interactive parent education opportunities; and
- b. Provide recipe ingredients to each family registered for parent education events to allow families to join dietitians and learn to prepare a healthy, economical family meal.

2. Expected Outcomes and Tools/Methods for Tracking Progress:

- a. After participation in parent education events, families will report participation and subsequent meal preparation activities as documented in home visits notes and in annual family survey.

## **II. Service Delivery**

### **A. Needs of Children and Families**

A healthy diet is essential for optimal growth, development and overall well-being of children, adolescents and adults. Child nutrition is crucial for physical and cognitive development of children, including executive function skills; inadequate and insufficient diets contribute to adverse physical and behavioral health outcomes throughout childhood and into adulthood. 2023 data from Feeding America indicates that 11.1% of Snohomish County residents experience food insecurity<sup>5</sup>. Research conducted in 2023 in the United States confirms that the COVID-19 pandemic shifted dietary habits for many families, including an increased consumption of processed foods, sugary snacks and screen time, and less consumption of nutritious foods<sup>11</sup>. Financial challenges and disruptions to family schedules were primary contributors to these shifts. A 2023 study, published in the International Journal of Pharmaceutical and Clinical Research, found significant gaps in parent knowledge of childhood nutrition and recommended daily servings of food groups. In addition, parental practices such as food choices, meal planning and limiting the consumption of unhealthy foods also revealed room for improvement<sup>1</sup>.

A report issued by the CDC in 2021 described the food consumption patterns of one- to five-year olds, focusing on daily fruit, vegetable and sugar-sweetened beverage consumption and found that nearly one-third (32.1%) of children did not eat a daily fruit, nearly one-half (49.1%) did not eat a daily vegetable, and 57.1% drank a sugar-sweetened beverage at least weekly<sup>8</sup>. Researchers from the American Dietetic Association, in a previous study, found similar results and noted that children's diets largely reflect household patterns, and recommend family-focused approaches to fostering the development of healthy eating habits; encouraging caregivers to expose young children to a wide variety of fruits and vegetables, and to limit the consumption of low-nutrient foods are suggested approaches<sup>7</sup>.

The University of Illinois conducted a study in 2021 to examine the relation between children's dietary intake, household chaos (defined as high in noise and crowding and low in regularity and routines) and executive function abilities in children 18 – 24 months of age. The results indicate an association between household chaos and poorer executive function consistent with previous literature and an association between sweet snacks and processed food and lower executive function abilities. Authors suggest that preventions focused on activities and support for parents to establish healthy routines and lower unhealthy food intake in their children may help support executive function development<sup>10</sup>. Evidence strongly suggests that the earlier children are exposed to integrated nutrition and child development interventions, the stronger the cognitive benefit will be<sup>2</sup>.

A review of literature regarding children's nutrition also notes the importance of parental modeling of eating healthy foods and introducing young children to a variety of

fruits and vegetables<sup>6</sup>. The CDC states that early eating experiences can affect how we eat as we get older<sup>4</sup> so supporting families with engaging, interactive and age-appropriate nutrition education, in tandem with other EHS services that promote adult/child relationships, routines, play and cognitive development, will help build a stronger foundation for enrolled children and their families to be physically and emotionally healthy for years to come.

## **B. Proposed Projects**

Snohomish County Early Head Start is proposing four projects intended to strengthen nutrition services and promote healthy eating for enrolled children and their families:

- Professional development for staff focused on breastfeeding
- Breastfeeding supports at Socializations
- Implement modified Harvest for Healthy Kids curriculum in home visits and socializations
- Offer family nutrition education events that include meal preparation demonstration and opportunity

### **1. Professional Development**

Recognizing the critical importance of breastmilk for healthy newborn, infant and child development, and the benefits to both mother and child<sup>3,9</sup>, strengthening the knowledge and skills of staff to support families who choose to breastfeed or pump and bottle feed breastmilk is a priority for our program. Research demonstrates benefits of breastfeeding to both mother and child; it reduces the mother's risk of breast and ovarian cancer, type 2 diabetes and high blood pressure, and protects babies against several short term and long-term illnesses and diseases including asthma, obesity, type 1 diabetes, ear infections and SIDS<sup>3</sup>. The Florida State University Center for Prevention and Early Intervention Policy (FSU CPEIP) offers research-based curriculum, training and education that promotes the health and well-being of pregnant and parenting families of infants and toddlers. Snohomish County Early Head Start utilizes FSU CPEIP's *Partners for a Healthy Baby* as an adjunct curriculum, and the FSU CPEIP offers a 20-Hour Breastfeeding Counselor Course designed for home visitors and other community-based providers. Course content includes the basics of breastfeeding, lactation management, strategies to increase supply and to increase duration rates. The course is offered at least once per quarter and consists of three live virtual sessions followed by an online posttest participants must pass. Participants are also required to read The American Academy of Pediatrics *New Mother's Guide to Breastfeeding* (4<sup>th</sup> edition) prior to the first session. The course is approved by both the Florida Board of Nursing and the International Board of Lactation Consultant Examiner for 20 Continuing Education Units.

In addition to the Breastfeeding Counselor Course, we plan for staff to participate in the Care Courses® "Supporting Breastfeeding in Child Care" to strengthen their

knowledge and capacity to support breastfeeding mothers at twice-monthly socializations. Care Courses has provided professional development for childcare professionals, including CDA classes and certification, Early Childhood Education certificates, and state continuing education requirements for over 35 years; they are an accredited provider through the International Accreditors for Continuing Education and Training. Course content includes benefits of breastfeeding including for children with special needs, supporting families who are breastfeeding, safe handling and storage guidelines, components of a breastfeeding-friendly program, and a self-appraisal questionnaire evaluating participant program's breastfeeding policies.

Engagement and successful completion of both professional development courses will provide staff with a strong foundation for supporting breastfeeding families. Research by the University of Nebraska<sup>9</sup> notes that women considered low-income, the very women served in EHS, are the least likely to breastfeed, and women lacking breastfeeding support are more likely to stop breastfeeding sooner. Training staff as breastfeeding counselors and to consider and create supportive socialization environments will provide education, stable support and encouragement for families, and both mother and child will benefit from successful and longer duration breastfeeding. These are one-time expenses that will benefit children and families for years into the future.

## 2. Breast Feeding Supports

Accompanying the above project designed to strengthen staff skill and confidence to assist breastfeeding families, is the plan to improve our socialization spaces to better support breastfeeding and pumping mothers. The University of Nebraska defines the social-ecological model of breastfeeding influences, which considers influences impacting a woman's decision to initiate and continue breastfeeding, including supportive environments in the community and workplace, interpersonal relationships and program policies<sup>9</sup>. Snohomish County EHS plans to develop and utilize "breastfeeding kits" at all socializations as a means to increase participation of breastfeeding and/or pumping mothers. Private space for breastfeeding/pumping is available in our socialization settings, and all provide an accessible refrigerator. However, additional supports are currently limited, so kits will be created for use at every location. Each kit will include two nursing pillows, each with a waterproof liner, and four washable covers. In addition, breastmilk storage bags will be included, and two small coolers, with ice packs, to allow parents to safely transport pumped milk home. A bench glider rocker will be added to the private breastfeeding space in one socialization site. The majority of these expenses are one-time costs; the recurring cost of breastmilk storage bags will be included in future EHS budgets as needed.

### 3. Harvest for Healthy Kids

Supporting parents to understand their vital role in promoting healthy eating habits in their children is a key component of strengthening children's nutrition and overall health outcomes. Snohomish County Early Head Start is proposing to modify the Harvest for Healthy Kids (HHK) curriculum, a nationally recognized evidence-based curriculum with the goal to promote healthy eating habits in early childhood, to use in home visits and at socializations with families. HHK provides materials focused upon the "produce of the month" with recommendations of activities, books, recipes, songs and conversation starters/questions for families to engage in with their child. The activities promote exploration of the produce, cooking with children and recipes to taste it made in a variety of ways, and science/creative projects. By offering these activities, and the accompanying food items, to families, parents will naturally model for children the eating of healthy foods, will introduce a variety of vegetables and fruits to their young child, and will learn recipes/food preparation ideas that their family enjoys and can be replicated in the future. Involving children in meal preparation and parental modeling of healthy dietary behaviors have been shown to positively affect children's eating habits<sup>12,13</sup>. The produce of the month will be included in socialization snacks and will provide participants with an additional exposure to the food and offer parents the opportunity to share ideas/successes/challenges experienced in their activities with children.

In addition to HHK, we also plan to incorporate nutrition education materials specifically for families with infants and toddlers, into home visits, to support families transitioning children to solid foods, bringing baby to the family meal table, supporting toddler eating (including picky eaters) and cooking with their child. These materials are written by registered dietitian nutritionists and incorporate concepts from WIC, USDA Food and Nutrition Service, American Academy of Pediatrics, CDC and US Dietary Guidelines. They provide family education and information, and examples of achievable goals, meal and snack ideas, mealtime parenting and physical activity ideas in an easy-to-read format supportive of families.

Staff will participate in the Fun and Fitness class offered through Care Courses to deepen their knowledge regarding child nutrition and physical activity. The course content includes the benefits of physical activities for children, planning activities for children, guidelines and activities for infants, toddlers and preschoolers, guidelines for children with diverse abilities and needs, healthy food selection and eating practices and parents' role in maintaining children's health. Information and strategies obtained in the course will be applicable.

Snohomish County plans to use grant funds to print the HHK materials; staff materials are a one-time cost, and printing for families will be included in the regular EHS budget. We will use grant funds to purchase the produce of the

month and accompanying ingredients and are working on developing a relationship with local community gardens, including Puget Sound Public Farms, to provide produce in subsequent years. Grant funding will also purchase the Nutrition Matters materials; these will be included in the regular EHS budget in the future. The Fun and Fitness class is a one-time expense.

**4. Family Nutrition Education**

To support families to prepare healthy and tasty meals using readily accessible ingredients, Snohomish County EHS is proposing a partnership with Sound Dietitians, a team of Registered Dietitian Nutritionists (RDN) whose foundational belief is that expert nutrition advice should be convenient and accessible to all. Their approach combines both the science of nutrition with the “art” of nutrition services. They employ evidence-based guidelines, consider the latest research and best practices while also ensuring they respect families’ food traditions and preferences. They strive to “translate nutrition science into real-life application” and utilize an individualized approach that meets the needs of the families with whom they work. In this partnership, RDNs will provide virtual nutrition education workshops, focused upon preparing and eating healthy meals together as a family. Workshops will include tips and tricks to address food challenges, such as picky eating, texture avoidance, etc., education on child nutritional needs and benefits of healthy eating, and demonstrating the preparation of a healthy, child-friendly meal. Families will be provided with the meal ingredients in advance and will be able to prepare the meal simultaneously with the demonstration or, should they choose, after the demonstration. These workshops encourage cooking activities with children, support family meals so adults can model healthy eating practices, reinforce the inclusion of healthy options in snacks and meals, offer opportunities for parents to better understand their child’s nutritional needs and to ask questions and learn together in a safe and supportive environment.

Grant funds will be used to cover the cost of providing families the ingredients for the meal prep demonstration and to pay Sound Dietitians staff for the workshops. Because staff and families will participate together, in the future, if this project is successful, we plan for EHS staff to provide meal demonstrations in partnership with our existing RDN; we will seek additional funding to support the purchase of meal ingredients if unable to include them in our regular EHS budget.

**SECTION II: BUDGET NARRATIVE**

**I. Narrative: Costs by Object Class Budget Category**

- A.** This budget reflects a total amount of \$49,677 which includes 39,742 in Early Head Start operations funds. The budget also reflects \$9,935 in non-federal match.

We do not receive any other funding to cover the cost of these projects. We are a home-visiting program, so do not participate in and or receive funding for these activities from National School Lunch Program, Child and Adult Care Food Program, National School Lunch Program Equipment Assistance Grants, Patrick Leahy Farm to School Program, or any other USDA Food, Nutrition and Consumer Services Child Nutrition programs. We do not receive funding from the USDA's Special Supplemental Nutrition Program for Women, Infants and children.

**B. Personnel:** None requested

**C. Fringe Benefits:** None requested

**D. Supplies:** The total cost for Supplies is \$24,632.20. These funds are distributed as follows: \$447.20 for breastfeeding kit supplies, \$2,510 for nutrition education materials, and \$21,675 for produce of the month items for home visits and socializations and ingredients for family nutrition education workshops including meal demonstrations.

**E. Equipment:** The total cost for equipment is \$1,264 and will be used to purchase a bench glider rocker for socializations.

**F. Contractual:** The total cost for Contractual is \$11,686. These funds are distributed as follows: \$6,886 for staff professional development activities (\$6,050 Breastfeeding Counselor Course, \$440 for Nutrition in Early Childhood, \$198 for Fun and Fitness, and \$198 for Supporting Breastfeeding in Child Care), and \$4800 for family nutrition education workshops provided by RDNs.

**G. Other.** The total cost for Other is \$2,160 and will be used for copies and printing of nutrition curricula materials.

## **II. Source of Non-Federal Match**

Snohomish County has multiple sources of non-federal match supporting our EHS program. A review of 45 CFR §75.306, 2 CFR § 200.306, and Section 1303.4, by the Human Services Department Administrative Services Division Manager, determined the matches to be allowable. Specific amounts and the valuation methodology used for each, are outlined below:

**A. Volunteers - \$7,980**

1. Parent/Caregivers Working on Specific Child and Family Nutrition Goals. Estimating 57 parents/caregivers (71% of total enrollment) will participate for

approximately eight hours per year, at \$17.50/hour (Snohomish County Minimum Wage/comparable to an Assistant Teacher in a childcare center).

B. Supplies - \$1955.

1. Parent/Caregivers will receive food preparation tools/supplies to support their participation in the virtual family nutrition education events. Matching funds will be state funds.



### SECTION III: REFERENCES

1. Arya, J; Dinakaran, J; Yagnik, S; Vikram, S.; Bais, S., Arya, V, Arya S. A Study to Assess Parental Knowledge and Practices Regarding Child Nutrition. *International Journal of Pharmaceutical and Clinical Research* 2023; 15(6); 801-808.
2. Black, M.; Perez-Escamilla, R.; Fernandez Rao, S. Integrating Nutrition and Child Development Interventions: Scientific Basis, Evidence of Impact, and Implementation Considerations. *American Society for Nutrition. Adv Nutr* 2015;6:852–9; doi:10.3945/an.115.010348.
3. Center for Disease Control; Breastfeeding Benefits Both Baby and Mom. 2024. <https://www.cdc.gov/breastfeeding/php/about/index.html>
4. Center for Disease Control; Good Nutrition Starts Early. 2025. <https://www.cdc.gov/nutrition/features/good-nutrition-starts-early.html>
5. Dewey, A., Hilvers, J., Dawes, S., Harris, V., Hake, M., and Engelhard, E. (2025). Map the Meal Gap: A Report of Local Food Insecurity and Food Costs in the United States in 2023. Feeding America National Organization. <https://map.feedingamerica.org/county/2023/overall/washington/county/snohomish>
6. Draxten, M. MPH, RD; Fulkerson, J PhD; Friend, S. MPH, RD; Flattum, C. MS, RD; Schow, R. MPH. Parental role modeling of fruits and vegetables at meals and snack is associated with children's adequate consumption. *Appetite*. 2014 July ; 78: 1–7. doi:10.1016/j.appet.2014.02.017.
7. Fox, M.K. Med; Condon, E MS, RD; Briefel, R. DrPH, RD; Reidy, K. DrPH, RD; Deming, D PhD. Food Consumption Patterns of Young Preschoolers: Are they Starting Off on the Right Path. *Supplement to the Journal of the American Dietetic Association*, 2010, S52-S59.
8. Hamner, H. PhD; Dooyema, C. MPH, MSN; Blanck, H. PhD; Flores-Ayala, R. DrPH; Jones, J. PhD; Ghandour, R. DrPH; Petersen, R. MD. Fruit, Vegetable and Sugar-Sweetened Beverage Intake Among Young Children, by State – United States, 2021. *MMWR Morb Mortal Wkly Rep* 2023; 72:7, 165-170.
9. Hatton-Bowers, H.; Cruickshank, K.; Hulse, E. Strategies to Promote and Enhance Breastfeeding with Cultural Awareness. *Nebraska Extension Publications G2291* 2017.
10. Iwinski, S.; Donovan, S.M.; Fiese, B.; Bost, K. The Impact of Household Chaos and Dietary Intake on Executive Function in Young Children. *Nutrients* 2021, 13, 4442. <https://doi.org/10.3390/nu13124442>
11. Lee, H; Oldewage-Theron, W; Lyford, C.; Shine, S. Nutrition and health challenges among low-income families of young children in the post COVID-19 era: a qualitative study. *Nutrition Research and Practice* 2023 Dec, 17(6), 1185-1200.

12. Mahmood, L.; Flores-Barrantes, P.; Moreno, L.A.; Manios, Y.; Gonzalez-Gil, E.M. The Influence of Parental Dietary Behaviors and Practices on Children's Eating Habits. *Nutrients* 2021, 13, 1138. <https://doi.org/10.3390/nu13041138>
13. van der Horst, K.; Ferrage, A.; Rytz, A. Involving children in meal preparation. Effects on food intake. *Appetite*. 2014 Aug;79:18-24. doi: 10.1016/j.appet.2014.03.030. Epub 2014 Apr 4. PMID: 24709485.

### Application for Federal Assistance SF-424

\* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

\* 2. Type of Application:

- ☐ New  
☐ Continuation  
☒ Revision

\* If Revision, select appropriate letter(s):

Increase Award

\* Other (Specify):

\* 3. Date Received:

4. Applicant Identifier:

10CH012960

5a. Federal Entity Identifier:

N/A

5b. Federal Award Identifier:

10CH012960

#### State Use Only:

6. Date Received by State:

7. State Application Identifier:

#### 8. APPLICANT INFORMATION:

\* a. Legal Name: Snohomish County Human Services Department

\* b. Employer/Taxpayer Identification Number (EIN/TIN):

91-6001368

\* c. UEI:

LG8NG8JNJD83

#### d. Address:

\* Street1: 3000 Rockefeller Ave

Street2: # 305

\* City: Everett

County/Parish: Snohomish County

\* State: WA: Washington

Province:

\* Country: USA: UNITED STATES

\* Zip / Postal Code: 98201-4071

#### e. Organizational Unit:

Department Name:

Snohomish County Human Service

Division Name:

#### f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

\* First Name:

Kristina

Middle Name:

\* Last Name:

Saunsaucie

Suffix:

Title: Early Head Start Director

Organizational Affiliation:

Snohomish County Human Services-EHS

\* Telephone Number: (425) 388-6439

Fax Number:

\* Email: kristina.saunsaucie@snoco.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

County Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

ACF-Head Start

### 11. Catalog of Federal Domestic Assistance Number:

93.600

CFDA Title:

Head Start

### \* 12. Funding Opportunity Number:

eGrants-N/A

\* Title:

N/A

### 13. Competition Identification Number:

Not Applicable

Title:

Not Applicable

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

All of Snohomish County, WA

### \* 15. Descriptive Title of Applicant's Project:

Early Head Start

Attach supporting documents as specified in agency instructions.

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

WA-002

b. Program/Project

WA-001, WA-002, WA-008

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**

\* a. Start Date:

01/01/2025

\* b. End Date:

12/31/2025

**18. Estimated Funding (\$):**

\* a. Federal

39,742

\* b. Applicant

7,980

\* c. State

1,955

\* d. Local

\* e. Other

0

\* f. Program Income

\* g. TOTAL

49,677

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE The certification does not encompass any certification or assurance that has been enjoined by the August 12, 2025 Preliminary Injunction in King County et al. v. Turner et al., 2:25-cv-00814-BJR (W.D. Wash.).

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

Mr.

\* First Name:

Dave

Middle Name:

\* Last Name:

Somers

Suffix:

\* Title:

Snohomish County Executive

\* Telephone Number:

(425) 388-3050

Fax Number:

\* Email:

dave.somers@snoco.org

\* Signature of Authorized Representative:

\* Date Signed:



# BUDGET INFORMATION - Non-Construction Programs

OMB Number: 4040-0006  
Expiration Date: 02/28/2025

## SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Catalog of Federal Domestic Assistance Number (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Early Head Start: Program Operations	93.600	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text" value="39,742"/>	\$ <input type="text" value="9,935"/>	\$ <input type="text" value="49,677"/>
2. Early Head Start: TTA	93.600	<input type="text"/>	<input type="text"/>	<input type="text" value="0"/>	<input type="text" value="0"/>	<input type="text" value="0"/>
3.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
4.	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
5. Totals		\$ <input type="text" value="0"/>	\$ <input type="text" value="0"/>	\$ <input type="text" value="39,742"/>	\$ <input type="text" value="9,935"/>	\$ <input type="text" value="49,677"/>

### SECTION B - BUDGET CATEGORIES

6. Object Class Categories	GRANT PROGRAM, FUNCTION OR ACTIVITY				Total (5)
	(1) Early Head Start: Program Operations	(2) Early Head Start: TTA	(3)	(4)	
a. Personnel	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text" value="0"/>
b. Fringe Benefits	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0"/>
c. Travel	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0"/>
d. Equipment	<input type="text" value="1,264"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="1,264"/>
e. Supplies	<input type="text" value="24,632"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="24,632"/>
f. Contractual	<input type="text" value="11,686"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="11,686"/>
g. Construction	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="0"/>
h. Other	<input type="text" value="2,160"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text" value="2,160"/>
i. Total Direct Charges (sum of 6a-6h)	<input type="text" value="39,742"/>	<input type="text" value="0"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text" value="39,742"/>
j. Indirect Charges	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	\$ <input type="text" value="0"/>
k. TOTALS (sum of 6i and 6j)	\$ <input type="text" value="39,742"/>	\$ <input type="text" value="0"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text" value="39,742"/>
7. Program Income	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>	\$ <input type="text"/>

Authorized for Local Reproduction

Standard Form 424A (Rev. 7-97)  
Prescribed by OMB (Circular A -102) Page 1A



SECTION C - NON-FEDERAL RESOURCES					
(a) Grant Program		(b) Applicant	(c) State	(d) Other Sources	(e) TOTALS
8.	Early Head Start: Program Operations	\$ 7,980	\$ 1,955	\$	\$ 9,935
9.	Early Head Start: TTA				0
10.					
11.					
12. TOTAL (sum of lines 8-11)		\$ 7,980	\$ 1,955	\$ 0	\$ 9,935

SECTION D - FORECASTED CASH NEEDS					
	Total for 1st Year	1st Quarter	2nd Quarter	3rd Quarter	4th Quarter
13. Federal	\$ 39,742	\$ 9,936	\$ 9,936	\$ 9,935	\$ 9,935
14. Non-Federal	\$ 9,935	2,483	2,484	2,484	2,484
15. TOTAL (sum of lines 13 and 14)	\$ 49,677	\$ 12,419	\$ 12,420	\$ 12,419	\$ 12,419

SECTION E - BUDGET ESTIMATES OF FEDERAL FUNDS NEEDED FOR BALANCE OF THE PROJECT				
(a) Grant Program	FUTURE FUNDING PERIODS (YEARS)			
	(b) First	(c) Second	(d) Third	(e) Fourth
16.	\$	\$	\$	\$
17.				
18.				
19.				
20. TOTAL (sum of lines 16 - 19)	\$	\$	\$	\$

SECTION F - OTHER BUDGET INFORMATION	
21. Direct Charges:	22. Indirect Charges:
23. Remarks:	



# **U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCES**

---

**Office of Head Start**

Updated May 30, 2025

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF  
REQUIRED CERTIFICATIONS AND ASSURANCE

---

Table of Contents

SF424B, Assurances ..... 1

Certification Regarding Lobbying ..... 3

Certification Regarding Level II of the Executive Schedule ..... 3

Certification of Filing and Payment of Federal Taxes ..... 4

# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

---

## SF424B Assurances – Non-Construction Programs

1. Has the legal authority to apply for Federal assistance and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project cost) to ensure proper planning, management and completion of the project described in this application.
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.
3. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and, (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.
7. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.

## U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

---

9. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333), regarding labor standards for federally-assisted construction subagreements.
10. Will comply, if applicable, with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
11. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
12. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
13. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, ~~executive orders~~, regulations, and policies governing this program.
19. The governing body and policy council will participate in developing and approving this application.



# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

---

## Certification Regarding Lobbying

### Certification for Contracts, Grants, Loans, and Cooperative Agreements

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form- LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.
3. The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

### Statement for Loan Guarantees and Loan Insurance

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## Regarding Compliance with Compensation Cap (Level II of the Executive Schedule)

Federal funds will not be used to pay any part of the compensation of an individual employed by a Head Start and/or Early Head Start agency if that individual's compensation exceeds the rate payable for Level II of the Executive Schedule.

# U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES COMPENDIUM OF REQUIRED CERTIFICATIONS AND ASSURANCE

## Certification of Filing and Payment of Federal Taxes

As required by the Departments of Labor, Health and Human Services, and Education and Related Agencies Appropriation Act, 2008 (Public Law 110-161, Division G, Title V, section 523), as a prospective financial assistance recipient entering into a grant or cooperative agreement of more than \$5,000,000, I, as the duly authorized representative of the applicant, do hereby certify to the best of my knowledge and belief, that:

1. The applicant has filed all Federal tax returns required during the three years preceding this certification
2. The applicant has not been convicted of a criminal offense pursuant to the Internal Revenue Code of 1986 (U.S. Code - Title 26, Internal Revenue Code)
3. The applicant has not, more than 90 days prior to this certification, been notified of any unpaid Federal tax assessment for which the liability remains unsatisfied, unless the assessment is the subject of an installment agreement or offer in compromise that has been approved by the Internal Revenue Service and is not in default, or the assessment is the subject of a non-frivolous administrative or judicial proceeding.

## Submission Statement

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I attest that the governing body and policy council participated in the development and approval of this application. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE The certification does not encompass any certification or assurance that has been enjoined by the August 12, 2025 Preliminary Injunction in King County et al. v. Turner et al., 2:25-cv-00814-BJR (W.D. Wash.).

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

### Authorized Representative:

Prefix:	Mr.	* First Name:	Dave
Middle Name:			
* Last Name:	Somers		
Suffix:			
* Title:	Snohomish County Executive		
* Telephone Number:	(425) 388-3050	Fax Number:	
* Email:	dave.somers@snoco.org		
* Signature of Authorized Representative:		* Date Signed:	
* Submitted by:		Date Submitted:	





## ADMINISTRATION FOR CHILDREN & FAMILIES

Federal Fiscal Year 2025

### STANDARD TERMS AND CONDITIONS

Except as noted otherwise, these Terms and Conditions (T&Cs) apply to Federal financial assistance awards, i.e., grant and cooperative agreement programs, administered by the Administration for Children and Families (ACF). Please see the [Award Terms and Conditions](#) page.

### **EFFECTIVE PERIOD**

This Standard T&Cs and each of the program-specific supplemental T&Cs are effective on the date shown in the footer at the bottom of the respective pages and applies to awards and award modifications that add funding which are issued on or after that date (including any supplements to awards and competing and non-competing continuation awards). For recipients of such awards, the T&Cs supersede all previous similar T&Cs and will remain in effect until updated for subsequent awards. All T&Cs will be updated and reissued as needed.

**UPDATES:** The following table shows the updates that were made to this document:

Date Updated	Significant Change
2025/07/29	Under the <i>Applicable Legislation, Statutes, Regulations</i> heading: <ul style="list-style-type: none"> <li>Removed the Civil Rights Assurance term and condition under item 7</li> <li>Added the Antidiscrimination Laws and Requirements term and condition under item 7.</li> </ul>
2025/07/25	Added this “Updates” table to note the significant changes from the previous version of the T&C document.  Added a new term and condition under the <i>Enforcement</i> heading: <ul style="list-style-type: none"> <li>The new term and condition addresses terminations by emphasizing that there are new additional bases upon which grants that are covered by the term may be terminated.</li> </ul>
2025/05/09	New terms and conditions added under the <i>Applicable Legislation, Statutes, Regulations</i> heading: <ul style="list-style-type: none"> <li>Additional clarification added to the introduction of the section.</li> <li>New text under item 6 referring to Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§1681 et seq., and Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§2000d et seq. This change applies to awards made on or after May 9, 2025.</li> <li>New text under item 7 entitled Civil Rights Assurance. This change</li> </ul>

Date Updated	Significant Change
	<p>applies to awards made on or after May 9, 2025.</p> <p>Under the <i>Federal Financial Assistance Award Acceptance</i> heading:</p> <ul style="list-style-type: none"> <li>Updated the link to the HHS Grants Policy Statement (GPS) to reduce connectivity issues with future versions.</li> <li>Added language concerning: 1) expenditures being free of fraud, waste, duplication and 2) ensuring all payments are in the best interest of the federal government.</li> </ul> <p>Under the <i>Enforcement</i> heading:</p> <ul style="list-style-type: none"> <li>Added language clarifying enforcement actions on subawards.</li> <li>Added a note to States and Tribes addressing procurement procedures.</li> </ul>

### ***Precedence***

All applicable statutory or regulatory provisions supersede any conflicting or inconsistent provisions in this Standard T&Cs.

### ***Department of Health and Human Services (HHS) to Adopt 2 CFR Part 200 in Phases***

Per Federal Register (FR), [89 FR 80055](#), HHS describes the intended phases of formally adopting [2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) (UAR) as modified by Office of Management and Budget (OMB), [89 FR 30136](#), April 22, 2024). As a result, the content herein will identify both [45 CFR Part 75](#) and respectively, by effective date, 2 CFR Part 200 and [2 CFR Part 300](#) HHS-specific regulations.

Effective 10/1/2024 – Increasing Thresholds / Flexibilities for Recipients in 45 CFR Part 75 (to align with similar provisions in 2 CFR 200)

Provisions (Regulations)	Before 10/1/2024 Threshold under 45 CFR Part 75	On and After 10/1/2024 New Threshold
<b>Modified Total Direct Cost Definition</b> (45 CFR §75.2 / 2 CFR §200.1)	\$25,000	\$50,000
<b>Equipment</b> (45 CFR §75.320(e) / 2 CFR §§200.1, 200.313(e), 200.439(b)(2))	\$5,000	\$10,000
<b>Unused Supplies</b> (45 CFR §75.321(a) / 2 CFR §§200.1, 200.314(a))	\$5,000	\$10,000
<b>Micro-purchase Threshold<sup>1</sup></b> (45 CFR §75.329(a) / 2 CFR §200.320)	\$10,000	\$50,000
<b>Fixed Amount Awards Subawards</b> (45 CFR §75.353 / 2 CFR §200.333)	\$250,000	\$500,000

<sup>1</sup> This provision was adopted on December 12, 2017 under [Public Law 115-91](#) and [OMB Memorandum 18-18](#).



<b>Provisions</b> (Regulations)	<b>Before 10/1/2024</b> Threshold under 45 CFR Part 75	<b>On and After</b> <b>10/1/2024</b> New Threshold
<b>Closeout<sup>2</sup></b> (45 CFR §75.381 / 2 CFR §200.344)	90 days	120 days
<b>De Minimis Indirect Rate<sup>3</sup></b> (45 CFR §75.414(f) / 2 CFR §200.414(f))	10%	15%
<b>Single Audit</b> (45 CFR §75.501 / 2 CFR §200.501)	\$750,000	\$1,000,000

#### Effective 10/1/2025 – 2 CFR 200 and HHS Specific Modifications Implementation

- Adopt 2 CFR Part 200.
- Repeal 45 CFR Part 75 in its entirety and update existing citations in HHS regulations.
- Relocate HHS-specific modifications from 45 CFR Part 75 to 2 CFR Part 300:

<b>Modification</b>	<b>Before 10/1/2025</b> 45 CFR Part 75	<b>On and After</b> <b>10/1/2025</b> 2 CFR Part 300
<b>Adoption of 2 CFR Part 200</b>	75.106	300.106
<b>Conflict of Interest</b>	75.112	300.112
<b>Special Provisions for awards to For-Profit Organizations as Recipients</b>	75.216	300.218
<b>Special Provisions for awards to Federal agencies</b>	75.217	300.219
<b>Non-discrimination language</b>	75.300	300.300
<b>Federal Payment</b>	75.305(a)	300.305
<b>Revision of budget and program plans (specific to research care cost prior approval)</b>	75.308(c)(1)(ix)	300.308
<b>Intangible Property (patents and inventions)</b>	75.307(c)(2)	300.315
<b>Indirect Cost (Training and Foreign cap and allowing rates for American U, Beirut, and WHO)</b>	75.414(c)(1)	300.414
<b>Independent research and development costs</b>	75.476	300.477
<b>Shared responsibility payments</b>	75.477	300.478
<b>Cost Principles for Research &amp; Development Grant Activities with Hospitals</b>	Appendix IX	Appendix IX

#### ***Federal Financial Assistance Award Acceptance***

State, local, tribal and other laws and regulations may apply and affect expenditures of Federal funds provided that they conform to applicable federal statutes and regulations. The first draw down or request for award funds from HHS Division of Payment Management Services (PMS) constitutes acceptance of the T&Cs under the Federal award.

<sup>2</sup> This provision was adopted on September 15, 2023 under [88 FR 63591](#).

<sup>3</sup> Note this does not apply to HHS Training or Foreign awards, for which HHS retains the de minimis cap at 8%.



A Federal assistance award is subject to T&Cs set forth in the award, these standard T&Cs, and those T&Cs cited and incorporated by reference. A recipient is the entity that receives a Federal award directly from ACF, per [45 CFR §75.2](#) (effective 10/1/2025: [2 CFR §200.1](#)). By acceptance of an award, the recipient agrees to comply with these T&Cs. Unless indicated otherwise, per [45 CFR §75.101\(b\)\(1\)](#) (effective 10/1/2025: [2 CFR §200.101\(b\)\(2\)](#)), the T&Cs of Federal awards flow down to subrecipients and to contractors (when applicable) as described in [45 CFR §§75.351 – 75.353](#) (effective 10/1/2024: [2 CFR §200.333](#); effective 10/1/2025: [2 CFR §200.331 – 200.332](#)).

Recipients must comply with all T&Cs of their awards, including:

- a) The T&Cs in effect at the time of the award, including the requirements of applicable HHS uniform administrative regulations.
  - **Discretionary Awards:** Any T&Cs in effect at the time of the original award, or any non-competing continuation, post-award action or renewal award related thereto are applicable. Discretionary awards are subject to the requirements set forth in the Notice of Funding Opportunity (NOFO); Notice of Award (NoA) including remarks and/or specific award conditions (e.g., restricted drawdown); these Standard T&Cs; and the HHS Grants Policy Statement (GPS) (located on the [HHS Grants Policies & Regulations](#) page).
  - **Non-Discretionary Awards:** Non-discretionary awards are subject to these Standard T&Cs, the individual program-specific supplemental T&Cs, and NoA including remarks and/or specific award conditions.
- b) Requirements of statutes and regulations applicable to the program under which the award is funded, including authorizing statutes, appropriations statutes, generally applicable statutes, and any regulations related thereto.
- c) Ensuring that expenditures are free from fraud, waste, abuse, and duplication.
- d) Ensuring all payment arrangements (e.g., subawards, contracts) related to the Federal award are in the best interest of the United States, including its taxpayers.

### ***Enforcement***

Failure to comply with the T&Cs of the award may result in an enforcement remedy such as a disallowance, restricted drawdown, withholding of future awards, deferral of claims for Federal Financial Participation (FFP), or termination of the award. Some programs may have more specific termination provisions that will be referenced in the NOFO, the program-specific supplemental T&Cs, NOA, and/or in the specific award conditions (as applicable).

Likewise, per [45 CFR §75.352\(h\)](#) [effective on or after 10/1/2025: [2 CFR §200.332\(i\)](#)], recipients must consider taking enforcement actions on any noncompliant sub-awards as described in [45 CFR §75.371](#) [effective on or after 10/1/2025: [2 CFR §200.339](#)] and on contracts in accordance with [45 CFR §75.335](#) [effective on or after 10/1/2025: [2 CFR §200.327](#)].

- **Please note:** When conducting procurement transactions States and Indian Tribes must follow the same policies and procedures they use for non-federal funds. If they have no such policies and procedures, States and Indian Tribes must follow the procurement standards under the Uniform Guidance. ([45 CFR §§75.326 – 75.335](#); effective on or after 10/1/2025: [2 CFR §§200.317 – 200.327](#))

### **Termination**

New awards and funded modifications (including supplements to awards, and competing and non-competing continuation awards), that are issued on or after July 25, 2025, may be terminated for any of the reasons identified below unless the award was issued in either of two exempt program categories. Under the categories of awards that are exempt, the below termination bases do not apply to any program that is subject to a Federal statute that provides otherwise (such as a mandatory grant authorizing statute), or listed at 45 CFR § 75.101(d)(1)-(4) [effective on or after 10/1/2025: 2 CFR §200.101(e)(1)-(4)]:

1. ***Prior to October 1, 2025***, this award is subject to the termination provisions at [45 CFR §75.372](#).
2. ***Starting October 1, 2025***, this award is subject to the termination provisions at [2 CFR §200.340](#). By accepting the award, the recipient agrees to this term and condition. Pursuant to [2 CFR §200.340\(a\)\(4\)](#), an award may be terminated pursuant to this term and condition in addition to the reasons identified in [2 CFR §200.340\(a\)\(1\)-\(3\)](#). Beginning on that date, under this term and condition of your award, the Department may terminate this award in part or in its entirety based upon:
  - (1) the availability of appropriated funds,
  - (2) the recipient's satisfactory progress in achieving the goals or objectives of the project;
  - (3) the recipient's compliance with the terms and conditions of a previous award; or
  - (4) for whatever reason continued funding would not be in the best interests of the Federal government (including when a grant no longer effectuates the program goals or agency priorities).

Under this term and condition, an award may be terminated at any point during the performance period, including during a budget period.

## **ALL FEDERAL FINANCIAL ASSISTANCE PROGRAMS**

### **APPLICABLE LEGISLATION, STATUTES, REGULATIONS**

Recipients must follow Federal, State, and local laws applicable to HHS awards. This includes, but is not limited to, **any** statutory and regulatory requirements, even if not directly mentioned in these terms and conditions. These may include applicable provisions of the Fair Labor Standards Act ([29 U.S.C. §201 et seq.](#)), the False Claims Act ([31 U.S.C. §3729 et seq.](#)), the Immigration and Nationality Act ([8 U.S.C. §1101 et seq.](#)), and the Personal Responsibility and Work

Opportunity Reconciliation Act of 1996 ([Public Law 104-193](#)), and their corresponding regulations. This award is subject, at the minimum, to the following requirements:

1. The statutory requirements as identified in the NOFO or program-specific supplemental terms and conditions, and any requirements in the authorization and appropriations acts related to the program and award.
2. The HHS specific implementing regulations of 45 CFR Part 75 or 2 CFR Parts 200 and 300, as they are applicable in effect or implemented during the period of the award. See “Department of Health and Human Services (HHS) to Adopt 2 CFR Part 200 in Phases” in these T&Cs for effective dates and changes.
  - **Discretionary:** Unless otherwise stated in the NOFO, all provisions under the UAR apply. Please note discretionary recipients are required to report deviations from budget or program scope or objective, and must request prior written approval from ACF for budget and program plan revisions. See the NoA for any expanded authorities authorized under the award.
  - **Non-Discretionary:** Please refer to the program-specific supplemental T&Cs, which may also cite to or contain budget or program prior approval requirements.
3. *Other Code of Federal Regulations:* Unless otherwise provided by law, the following apply:
  - a. [2 CFR Part 25](#) – Universal Identifier and System for Award Management
  - b. [2 CFR Part 170](#) – Reporting Subaward and Executive Compensation Information
  - c. [2 CFR Part 175](#) – Award Term for Trafficking in Persons
  - d. [2 CFR Part 176](#) – Award Terms for Assistance Agreements that include Funds under the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5
  - e. [2 CFR Part 180](#) – OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Non-Procurement)
  - f. [2 CFR Part 182](#) – Government-wide Requirements for Drug-Free Workplace (Financial Assistance) (including Smoking Prohibitions ([20 U.S.C §§7971 – 7974](#), previously §§7181 – 7184)
  - g. [2 CFR Part 183](#) – Never Contract with the Enemy
  - h. [2 CFR Part 376](#) – Non procurement Debarment and Suspension
  - i. [2 CFR Part 382](#) – Requirements for Drug-Free Workplace (Financial Assistance)



- j. [31 CFR Part 205](#) – Rules and Procedures for Efficient Federal-State Funds Transfers – Cash Management Improvement Act (see also [31 U.S.C. §§3335, 6501, and 6503](#))
  - k. [45 CFR Part 16](#) – Procedures of the Departmental Grant Appeals Board
  - l. [45 CFR Part 30](#) – Claims Collection
  - m. [45 CFR Part 46](#) – Protection of Human Subjects
  - n. [45 CFR Part 80](#) – Nondiscrimination Under Programs Receiving Federal Assistance through the Department of Health and Human Services, Effectuation of Title VI of the Civil Rights Act of 1964
  - o. [45 CFR Part 81](#) – Practice and Procedure for Hearings Under Part 80 of this Title
  - p. [45 CFR Part 84](#) – Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving Federal Financial Assistance
  - q. [45 CFR Part 86](#) – Nondiscrimination on the Basis of Sex in Education Programs and Activities Receiving or Benefiting from Federal Financial Assistance
  - r. [45 CFR Part 87](#) – Equal Treatment for Faith-Based Organizations
  - s. [45 CFR Part 91](#) – Nondiscrimination on the Basis of Age in Programs or Activities Receiving Federal Financial Assistance from HHS
  - t. [45 CFR Part 92](#) – Nondiscrimination in Health Programs or Activities
  - u. [45 CFR Part 93](#) – New Restrictions on Lobbying
  - v. [45 CFR Part 95](#) – General Administration – Grant Programs
  - w. [45 CFR Part 100](#) – Intergovernmental Review of Department of Health and Human Services Programs and Activities
4. *Administrative and National Policy Requirements, including HHS Policy Directives* (identified with an asterisks (\*)) and *Annual Appropriation Limitations* (identified with two asterisks (\*\*)): Unless otherwise noted in the program-specific supplemental T&Cs, the NOFO, the administrative and national policy requirements, HHS policy directives, and annual appropriations limitations apply to all programs. Public policy requirements are requirements with a broader national purpose and are imposed by statute. The non-exhaustive list is located under the [Administrative and National Policy Requirements](#) page.
5. *Build America, Buy America (BABA) Applicability*: The BABA is not applicable to HHS

programs; therefore, the following does not apply to ACF awards:

- a. 2 CFR Part 184 – Buy America Preferences for Infrastructure Projects
  - b. 2 CFR §200.322 – Domestic Preference for Procurements provision
6. *Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§1681 et seq., and Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§2000d et seq.* For new awards made on or after May 9, 2025, the following is effective immediately:

~~By accepting this award, including the obligation, expenditure, or drawdown of award funds, recipients whose programs are covered by Title IX certify as follows:~~

- ~~• Recipient is compliant with Title IX of the Education Amendments of 1972, as amended, 20 U.S.C. §§ 1681 et seq., including Title VI of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000d et seq., and Recipient will remain compliant for the duration of the Agreement.~~
- ~~• The above requirements are conditions of payment that go to the essence of the Agreement and are therefore material terms of the Agreement.~~
- ~~• Payments under the Agreement are predicated on compliance with the above requirements, and therefore Recipient is not eligible for funding under the Agreement or to retain any funding under the Agreement absent compliance with the above requirements.~~
- ~~• Recipient acknowledges that this certification reflects a change in the government's position regarding the materiality of the foregoing requirements and therefore any prior payment of similar claims does not reflect the materiality of the foregoing requirements to this Agreement.~~
- ~~• Recipient acknowledges that a knowing false statement relating to Recipient's compliance with the above requirements and/or eligibility for the Agreement may subject Recipient to liability under the False Claims Act, 31 U.S.C. § 3729, and/or criminal liability, including under 18 U.S.C. §§ 287 and 1001.~~

7. *Antidiscrimination Laws and Requirements.*

~~By applying for or accepting federal funds from HHS, recipients certify compliance with all federal antidiscrimination laws and these requirements and that complying with those laws is a material condition of receiving federal funding streams. Recipients are responsible for ensuring subrecipients, contractors, and partners also comply.~~

8. *Assurance of Compliance.*

The Applicant hereby agrees that it will comply with Title VI of the Civil Rights Act of 1964, as amended (codified at 42 U.S.C. 2000d et seq.), and all requirements imposed by or pursuant to the Regulation of the Department of Health and Human Services (45 C.F.R. Part 80); Section 504 of the Rehabilitation Act of 1973, as amended (codified at 29 U.S.C. 794), and all requirements imposed by or pursuant to the Regulation of the Department of Health and Human Services (45 C.F.R. Part



84); Title IX of the Education Amendments of 1972, as amended (codified at 20 U.S.C. § 1681 et seq.), and all requirements imposed by or pursuant to the Regulation of the Department of Health and Human Services (45 C.F.R. Part 86); The Age Discrimination Act of 1975, as amended (codified at 42 U.S.C. § 6101 et seq.), and all requirements imposed by or pursuant to the Regulation of the Department of Health and Human Services (45 C.F.R. Part 91); and Section 1557 of the Patient Protection and Affordable Care Act, as amended (codified at 42 U.S.C. § 18116), and all requirements imposed by or pursuant to the Regulation of the Department of Health and Human Services (45 CFR Part 92).

## **COST SHARING OR MATCHING (NON-FEDERAL SHARE) OF PROGRAM FUNDING**

9. Some Federal financial assistance programs require the recipient to provide a portion of program funding, as specified in Federal law. Please see the NOFO or program-specific supplemental T&Cs for the requirements.
10. *Insular Areas*. For any program that (a) requires a non-Federal share of program funding and (b) is available to several identified recipients, under the provisions of 48 U.S.C. §1469a(d), as amended, the Insular Areas, defined as American Samoa, Guam, the Northern Mariana Islands and the U.S. Virgin Islands, these recipients are not required to provide up to \$200,000 of the non-Federal share of program funding. If, in any fiscal year, the non-Federal share exceeds \$200,000, the statutory Federal/non-Federal funding rates for that program will apply to all expenditures that exceed that threshold.

## **PROGRAM INCOME**

11. *Default Method*. Please refer to the NOFO, program-specific supplemental T&Cs, and NoA to verify if program income is permitted, and if so, how it is to be used. When the regulations or the T&Cs are silent, the default is the deduction method as described under 45 CFR §75.307(e) (effective 10/1/2025: 2 CFR §200.307(e)(1)). (“Ordinarily program income must be deducted from total allowable costs to determine the net allowable costs. Program income must be used for current costs unless the HHS awarding agency authorizes otherwise. Program income that the non-Federal entity did not anticipate at the time of the Federal award must be used to reduce the Federal award and non-Federal entity contributions rather than to increase the funds committed to the project.”)
12. *Property*. Proceeds from the sale of real property, equipment, or supplies, are not program income; such proceeds will be handled in accordance with the relevant property standards at 45 CFR §§75.318 – 75.322 (effective 10/1/2025: 2 CFR §§200.311 – 200.315), or as specifically identified in Federal statutes, regulations, or T&Cs of the Federal award. For more information about real property and tangible personal property, please see the subheading contained in this Standard T&C.
13. *Applicable Credit*. Unless provided in statutes, regulations, or T&Cs of the award, program income does not include rebates, credits, discounts, and interest earned on any of

them. When those sources are silent, to the extent that such credits accruing to or received by the recipient relate to allowable costs, they must be credited to the award either as a cost reduction or cash refund as described under 45 CFR §75.406 (effective 10/1/2025: 2 CFR §200.406).

## MONITORING AND REPORTING

Except in unusual circumstances, ACF recipients are required to use OMB-approved data collection forms and file these forms in intervals identified by the Federal award. (45 CFR §75.341-75.343; effective 10/1/2025: 2 CFR §§200.328 – 200.330) For more information, see the NOFO, program-specific supplemental T&Cs, NoA, or specific award conditions.

### 14. *Electronic Submissions.*

Reports must be submitted electronically. **Paper copies will not be accepted.** ACF recipients must submit reports through designated online reporting systems, as identified in the NOFO, program-specific supplemental T&Cs, NoA, and/or the specific award conditions. Each system is secured and requires individuals to use a PIN, username, and password.

- a. GrantSolutions On-Line Data Collection (OLDC) system is the online reporting mechanism and is located at <https://grantsolutions.gov>. The GrantSolutions Help Desk is open on Monday through Friday from 7:00 am to 8:00 pm ET (except for Federal Holidays). You may reach the Help Desk at 1-866-577-0771, 202-401-5282, or [help@grantsolutions.gov](mailto:help@grantsolutions.gov).
- b. HHS Payment Management System (PMS) is the online payment management mechanism and is located at <https://pms.psc.gov>. The PMS Help Desk is open Monday through Friday from 7:00 am to 9:00 pm ET (except Federal Holidays). You may reach the Help Desk at 1-877-614-5533 or [PMSSupport@psc.gov](mailto:PMSSupport@psc.gov).

## FINANCIAL REPORTING

15. Federal funds must be expended for the purposes which they were awarded and within the time period allotted. (45 CFR §75.302; effective 10/1/2025: 2 CFR §200.302)

### 16. *Obligation Period.*

- a. **Discretionary Awards:** Recipients may charge to the award “only allowable costs incurred during the period of performance.” (45 CFR §75.309; effective 10/1/2025: 2 CFR §200.309) See the NoA for the approved start and end dates of the period of performance and, if applicable, the budget period for the award. Costs incurred within a specific budget period may only be charged to the award within the dates specified for that budget period. Recipients may not charge costs incurred in a previous budget period to the next or any subsequent budget period.

- b. **Non-Discretionary Awards**: The program-specific supplemental T&Cs will set forth the deadline for obligation.

17. **Liquidation Period**.

Unless superseded by program specific statute or regulations, the deadline for liquidating all financial obligations incurred under the Federal award is not later than 120 calendar days after the end of the period of performance (or as specified in a program regulation). (effective 9/15/2023: 2 CFR §200.344) See NoA.

**PROGRAM REPORTING**

18. **Discretionary Awards**: Please see the NOFO, NoA, as well as [Reporting Requirements](#).

19. **Non-Discretionary Awards**: Please see the program-specific supplemental T&Cs for the program reporting requirements.

**PROPERTY REPORTING**

Real property (requires specific authority and prior approval, see limitation under item 16 within this T&C), tangible personal property, and intangible property, that is acquired or improved with a Federal award must be held in trust by the recipient as trustee for the beneficiaries of the project or program under which the property was acquired or improved. ACF requires the recipient to record liens or other appropriate notice of record to indicate that personal or real property has been acquired or improved with a Federal award and that use and disposition conditions apply to the property. Unless program regulations, program-specific supplemental T&Cs, or other program guidance say otherwise, recipients are required to follow the property standards outlined under 45 CFR §§75.316 – 75.323 (effective 10/1/2025: 2 CFR §§200.310 – 200.316). States must follow their own property standards. The following are the real property and tangible personal property guidance and reporting requirements. For additional information, please see the [ACF Property Guidance](#) pages.

***REAL PROPERTY REPORTING***

20. **Real Property Reports (SF-429s), OMB Control No. 4040-0016**. ACF programs must have specific statutory authority to allow recipients to provide support for acquisition, construction, and/or major renovation of real property. **Absent statutory authority and approval, costs are considered unallowable under the Federal award.** Only a few ACF programs have authority, please see the [Applicable ACF Programs with Real Property Authority](#) list. When Federal funds are allowed and used for these purposes, a Federal interest is established. A Notice of Federal Interest (NFI) must be recorded in the jurisdiction where the real property is located. Federal interest does not expire unless program statute says otherwise. So long as a Federal interest remains, property requirements and reporting apply. Recipients (and on behalf of subrecipients) are responsible for submitting the request and report forms. **Only forms submitted in**



**GrantSolutions OLDC are considered official real property submissions.**

The collection of SF-429 forms must be used for awards that establish a Federal interest on real property. Overview of forms are as follows:

- a. **SF-429.** The Cover Page must be submitted along with the other SF-429 Attachments (A, B, and C). GrantSolutions OLDC automatically adds the cover page to the Attachment.
- b. **SF-429 Attachment A.** The *General Report* form is due annually and follows the same reporting cycle as the annual Federal Financial Report or program specific Expenditure Report.
- c. **SF-429 Attachment B.** The *Acquire or Improve Request* form may be submitted at any time to request prior approval to use federal funds to acquire or improve property. The submission of this form, with supporting documentation, in GrantSolutions OLDC is the official starting point for any prior approval request to purchase, construct, and/or major renovation project for real property.
- d. **SF-429 Attachment C.** The *Disposition or Encumbrance Request* form may be submitted at any time to request disposition instructions. The submission of this form, with supporting documentation, in GrantSolutions OLDC is the official starting point for any prior approval disposition or encumbrance requests. When the property is no longer needed, the recipient (when applicable, on behalf of subrecipients) must submit in GrantSolutions OLDC a request for disposition instructions. OGM must be consulted and confirm the percentage of participation (federal interest) before any payment is remitted on a real property. ACF will review and make a decision on one of the three standard OMB disposition options described under 45 CFR §75.318(c) to eliminate the Federal interest. The recipient (when applicable, on behalf of subrecipient) is required to compensate ACF for its share by remitting payment when real property is sold or retained. Payment must be received and confirmed before ACF can release the federal interest on the property. For more information, see [Remit Payment](#) guidance.

Please note that for the SF-429 Attachment B and C, the appraised value is the current fair market value based on the appraisal (**no more than three years old**) conducted by an independent certified appraiser.

For more information, please see program-specific supplemental T&Cs, the [ACF Real Property Guidance](#), and the [Applicable ACF Programs with Real Property Authority](#) list.

**TANGIBLE PERSONAL PROPERTY REPORTING**

21. *Tangible Property Report (SF-428s), OMB Control No. 4040-0018.* The SF-428 is a standard form used to collect information related to tangible personal property purchased under a Federal award. Unless otherwise directed in the program-specific supplemental

T&Cs, Federal assistance programs are required to use the SF-428s. Recipients (and on behalf of subrecipients) are required to submit the forms. States must use, manage and dispose of equipment acquired under a Federal award by the state in accordance with state laws and procedures. Overview of the forms are as follows:

- a. **SF-428.** The Cover Page must be submitted along with the other SF-428 Attachments (B, C, and S).
- b. **SF-428 Attachment A.** The Federally Owned Property Annual Report is **not applicable to ACF programs**.
- c. **SF-428 Attachment B.** The Final/Award Closeout form on Acquired Equipment purchased with Federal Funds is due at the end of a Federal Assistance Award. This form may not apply to some non-discretionary programs. Please see program-specific supplemental T&Cs for applicability and exceptions.
- d. **SF-428 Attachment C.** The Disposition Request form on Acquired Equipment is due at any time other than award closeout. The submission of this form, with the SF-428 cover page and supporting documentation, to OGM is the official starting point for any prior approval disposition request. OGM must be consulted and confirm the percentage of participation (federal interest) before any payment is remitted on the property. Recipients (and on behalf of subrecipients) are required to compensate ACF for its share by remitting payment when equipment is sold or retained. Payment must be received and confirmed before ACF can release the federal interest on the property. For more information, see [Remit Payment](#) guidance.
- e. **SF-428 Attachment S.** The Supplemental Sheet may be submitted with the SF-428 Attachment B or C to provide additional information.

For more information, please see the [ACF Tangible Personal Property Guidance](#).

## AWARD PAYMENTS

22. ***Payment.*** All Federal financial assistance program payments will be made available through the HHS PMS. Questions pertaining to payments should be directed to: HHS Division of Payment Management, P.O. Box 6021, Rockville, MD, 20852, or PMS Help Desk at 877-614-5533, or [PMSSupport@psc.gov](mailto:PMSSupport@psc.gov). Other questions should be directed to the ACF contact listed on the NOA or program-specific supplemental T&Cs.
23. ***Returning Funds/Interest.*** Unless otherwise directed in the financial or program specific expenditure report, the HHS Program Support Center (PSC) serves as a centralized point for returning award interest and funds according to established federal law, policies, procedures, and regulations. PMS prefers that repayment be completed as an electronic transfer or by check. Please refer to the *Returning Funds/Interest* instructions under the *Recipients* drop-down on the [PMS website](#).

**SUBRECIPIENTS AND SUBCONTRACT MONITORING AND MANAGEMENT**

24. All Federal assistance programs must comply with the Subrecipient Monitoring and Management requirements described in subpart D, 45 CFR §§75.351 – 75.353 (effective 10/1/2025: 2 CFR §§200.331 – 200.333). Discretionary awards are also subject to the *ACF Term and Condition on Subawards* located on the *Administrative and National Policy Requirements* page, see item 4 herein.
25. Debarred or Suspended. No entity may participate in these programs in any capacity or be a recipient or subrecipient of Federal funds designated for these programs if the organization has been debarred or suspended or otherwise found to be ineligible for participation in Federal financial assistance programs or activities. Please see Executive Orders 12549 and 12689, as well as 2 CFR Parts 180 and 376 for debarment and suspension provisions. Recipients must include a similar T&C for all subawards and contracts awarded under these programs. Prior to issuing subawards and contracts under the Federal award, the recipient (pass-through) must review information available through the System for Award Management (SAM), <https://www.sam.gov>, to determine whether an entity is ineligible.
26. Determinations. Recipients are required to make case-by-case subrecipient and contractor determinations on whether the substance of an agreement creates a Federal assistance relationship (subaward) or a procurement relationship (contract) in accordance with 45 CFR §75.351 (effective 10/1/2025: 2 CFR §200.331). The presence of one or more characteristics may not be present in all cases; as such, the recipient must use judgment as the substance of the relationship is more important than the form of the agreement. ACF may also supply and require recipients to comply with additional guidance to support these determinations.
- Please note for subrecipients:** There is a long standing ACF OGM policy that any State, local, Tribal, or Territorial governments providing a service for a pass-through entity must be considered a subrecipient.
27. Fixed amount subawards. A fixed amount award cannot be used in programs which require mandatory cost sharing or matching in accordance with 45 CFR §75.201(b)(2) (effective 10/1/2025: 2 CFR §200.201(b)(2)). Many Federal assistance programs require the recipient to provide a portion of program funding, as specified in Federal law. Please see the NOFO or program-specific supplemental T&Cs for the cost sharing or matching (non-Federal share) requirement.
28. Indirect Cost. In accordance with 45 CFR §75.352(a)(4) (effective 10/1/2025: 2 CFR §200.332(a)(4)), pass-throughs must recognize the approved federally recognized indirect cost rate negotiated between the subrecipient and the Federal Government, or if no such rate exists, either a rate negotiated between the recipients and subrecipient or provide a percent de minimis indirect cost rate (10% under 45 CFR §75.414(f) prior to 10/1/2024; effective date 10/1/2024: 15% under 45 CFR §75.320(f); effective date 10/1/2025: 15%



under 2 CFR §200.414) Please direct indirect cost questions to the HHS PSC Division of Cost Allocation Services (CAS), see CAS [Contact Us](#).

29. Monitoring:

- a. Contract. Recipients are responsible for ensuring that contracts contain the applicable provisions described in Appendix II of 45 CFR Part 75 (effective 10/1/2025: 2 CFR Part 200). The recipient is responsible for oversight to ensure that contractors perform in accordance with the terms, conditions, and specifications of the contract or purchase order. Records must be maintained by the recipient and be sufficiently detailed for compliance.
- b. Subrecipient. Recipients are required to advise subrecipients of requirements imposed on them by Federal laws, regulations, and the provisions of award as well as any supplemental requirements imposed by the recipient. These include administrative and audit requirements (where applicable) under 45 CFR Part 75 (effective 10/1/2025: 2 CFR Part 200). The recipient must conduct a risk assessment of subrecipient(s) in accordance with 45 CFR §75.352(b) (effective 10/1/2025: 2 CFR §200.332(b)). Additionally, all subrecipient(s) must obtain a Unique Entity Identifier number assigned by the SAM, if they do not already have one. Recipients are required to check the SAM to verify that the subrecipient(s) is/are not debarred, suspended, or ineligible. Recipients are responsible for monitoring the activities of the subrecipient to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the T&Cs of the subaward, and that subaward performance goals are achieved. “Monitoring by the non-Federal entity must cover each program, function and activity.” See 45 CFR §§75.342 and 75.352 (effective 10/1/2015: 2 CFR §§200.329(a) and 200.332). Records must be maintained by the recipient and be sufficiently detailed for compliance. For more information, see item 4.k. *Salary Limitation – Federal Executive Level II* within this Standard T&C.

Should a subrecipient perform unsatisfactorily, the recipient is responsible for remedying subrecipient issues. Recipients of an award will be legally accountable to ACF for performance of the project or program. Recipients will be held solely responsible in the event of non-compliance by a subrecipient. The recipient will be held accountable for cost disallowances regarding subawarded funds. If requirements of the program cannot be met due to subrecipient issues, ACF may take one or more of the actions listed under 45 CFR § 75.371– 75.375 (effective 10/1/2015: 2 CFR §§200.339 – 200.343).

## NON-COMPETING CONTINUATIONS

30. Most ACF discretionary awards are funded in increments. These increments are referred to as “non-competing continuations.” If the award has multiple budget periods, recipients will be expected to submit non-competing continuation applications for each budget period. If not referenced in the NOA, the ACF Program Office or Grants Office will

provide additional information on what documentation to submit and deadlines for non-competing continuation applications. Deadlines are typically in advance of the start date of the next budget period to allow ACF sufficient time to process the applications.

## AUDITS

31. Recipients must arrange for the conduct of audits as required by 45 CFR Part 75, Subpart F – Audit Requirements (effective 10/1/2025: 2 CFR Part 200 Subpart F). For more information, also see [ACF Oversight and Monitoring: Audit Reports](#) page.
32. Recipients and pass-through entities, per 45 CFR §§75.352(f) and 75.501(effective 10/1/2025: 2 CFR §200.501), must verify that subrecipients also comply with the audit requirements.
  - a. **For-profit subrecipients.** Unless stated otherwise in regulation, guidance, the NOFO, or program-specific supplemental T&Cs, the Subpart F does not apply to for-profit subrecipients. (45 CFR §75.501(h) – (k); effective 10/1/2025: 2 CFR §200.501(h)) However, at a minimum, the recipient and pass-through entity are responsible for establishing requirements to ensure compliance by for-profit subrecipients. The agreement must describe applicable compliance requirements and the for-profit subrecipient's compliance responsibility.

## POINTS OF CONTACT

Points of contact for additional information or questions concerning either the operation of the program or related financial or Federal assistance award matters may be found on the NoA. The Program Office contact handles the programmatic specific needs such as program intent, goals and objectives; whereas, the OGM contact typically handles any business, financial, and administrative activities such as budget revisions, prior approval requests, and closeouts.

## IMPORTANT ADDRESSES

Administration for Children and Families  
Office of Grants Management  
330 C Street, SW. Mailstop 3127  
Washington, DC 20201

## OIG HOTLINE

The OIG of HHS maintains the OIG Hotline, a system for reporting allegations of fraud, waste, abuse and mismanagement in Department of Health and Human Services' programs. Your information will be reviewed by a professional staff member and will remain confidential; you need not provide your name. Information provided through the website is secure and all information is safeguarded against unauthorized disclosure. Report the possible misuse of federal funds by phone or online. Please provide as much detailed information as possible in your report.



Online: <https://oig.hhs.gov/report-fraud>  
Phone: 800-HHS-TIPS (800-447-8477)  
TTY: 800-377-4950  
Fax: 800-223-8164

If you are a provider, HHS contractor, HHS recipient or subrecipient and want to self-disclose potential fraud in HHS programs, please visit the *self-disclosure* webpage at:  
<https://oig.hhs.gov/compliance/self-disclosure-info/index.asp>.

#### IMPORTANT WEBSITES

- [Welcome To ACF website.](#)
- [ACF Award Terms and Conditions.](#)
- [HHS Grants website.](#)
- *Congress.gov Congressional Research Service:* [Appropriations.](#)
- *General and Permanent Laws:* [United States Code \(U.S.C.\).](#)
- *Federal Regulations:* [Electronic Code of Federal Regulations \(e-CFR\).](#)
- *Congress.gov:* [U.S. Federal Legislative Information.](#)

