Appalachian Regional Commission

GRANT ADMINISTRATION MANUAL

ARC Non-Construction Grants
Revised November 2025

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Welcome

Congratulations on receiving an ARC award! This manual provides guidance on the post-award administration of ARC non-construction projects from the time of grant approval through closeout and beyond. Each section contains information and instructions on how to manage your grant while remaining compliant with all applicable rules and regulations that are subject to your award.

Shortly after the date of the executed ARC Grant Agreement, grantees should receive a system-generated email which includes additional information on reporting and other helpful resources to further support the successful management of their award. This email can be saved and used as a point of reference to quickly access those items most pertinent to the administration of your grant.

NOTE: There are some non-construction projects (i.e., Access to Capital, Administrative and Consolidated Technical Assistance grants) that are accompanied by unique post-award processes and reporting requirements. Please refer to your ARC Grant Agreement and check with your ARC Project Coordinator to verify that you are following the appropriate guidelines.

This manual does not apply to ARC construction projects administered by a registered state basic agency (RSBA) or a federal basic agency. If you are an ARC construction project grantee, please reach out to your project's basic agency to gain further information about post-award requirements.

If you have questions about any aspect of your ARC grant, contact the ARC Project Coordinator identified in your Pathways project record.

Project Management

What to Do First

Log into **Pathways**, ARC's grants management system, to access your dashboard and electronic project record. At this point, you should already have an account in Pathways; if you have not received an email with account activation steps OR if you have access to Pathways but don't see the project on your dashboard, please check with a member of the project team on this grant to confirm you have been invited. If you continue to have trouble accessing your account, email pathways-support@arc.gov

NOTE: Pathways is designed to organize accounts based on group affiliation, as opposed to an individual person or lead applicant. Therefore, your account may include a list of applications that are in-progress or active projects that are associated with your organization to which you have different roles assigned. It is your role designation that determines the actions you can take on any particular project (i.e. view only, input data/reports, certify and submit). If you find that you need a different role designation to perform specific administrative tasks for a particular project, reach out to the primary contact of that project to make that request. The primary contact for any given project is listed under the *Applicant Info* tab in Pathways.

From your dashboard, you will find a list of approved projects by clicking on the *Approved/Active* tab. Select the appropriate project and proceed to manage your award.

Supplemental Resource: For step-by-step instruction on how to navigate Pathways and additional guidance on the technical components of ARC grant administration, refer to *Post-Award Activities* section in the *Pathways How-To Guide for External User's Manual.*

Electronic Project Record and Post-Award Activities

Before signing the ARC Grant Agreement, you should carefully read all of its provisions. You should also reexamine the Grant Agreement before beginning project activities. The Grant Agreement is a binding contract that provides requirements you must meet throughout the grant performance period. Remember: you are responsible for complying with all the terms of the Grant Agreement. Additionally, take the time to review the projected performance measures for your project, as they appear in Pathways, to make sure they are accurate in count and description. You are responsible for tracking these measures and reporting your progress in interim and final reports to ARC.

The project's start and end dates (the "project period" or "period of performance") are specified both in your Grant Agreement and in your electronic project record. Do not begin project activities before the project's start date nor continue them beyond the end date, as only activities conducted and costs incurred during the period of performance are eligible for reimbursement or are able to be used as match.

Video Resource: Signing Your Grant Agreement in Pathways

Communication and Primary POCs

Throughout the duration of your award, the Project Coordinator assigned to your grant will be your primary point of contact at ARC. As you move through this manual, you will find many references related to contacting or reaching out to your Project Coordinator, as well as an occasional reference to other key individuals that are involved in the administration of your award (i.e., State Program Managers). While the name and contact information of your Project Coordinator is included in your ARC Grant Agreement, this assignment may change over the course of your award. You can refer to your electronic project record in Pathways to verify the name and contact information of the current Project Coordinator assigned to your project.

The Pathways system has functions built into the system that enable direct communication between you, your Project Coordinator, and any other ARC points of contact as indicated. Whenever possible, you should utilize these functions as they're intended (i.e., responding to an annotation request, submitting an amendment request, etc.).

Any email communication that occurs outside of Pathways with Project Coordinators or other ARC points of contact should include the complete grant number (including all hyphens) in the subject line. Note that grant numbers have letters, numbers, hyphens (-), and no spaces, e.g. AL-12345.

Starting the Project

You can begin work on your ARC-funded project as soon as the period of performance included in your fully signed Grant Agreement begins. Unless explicitly stated in your ARC Grant Agreement, you

do not need to contact ARC before you begin. ARC Project Coordinators and state contacts are available to answer your questions and provide guidance as needed.

Written Policies and Procedures

Before beginning your ARC project, please review the Uniform Guidance (2 CFR 200) to ensure your organization has adopted all the written policies and procedures required by the Uniform Guidance. Generally, written policies and procedures are required to ensure that applicable grant regulations and the procedures of your organization are followed anytime you incur a cost in your grant budget. You may also consult the ARC Policies and Procedures Checklist for guidance on the policies and procedures you should have in place.

Procurement

If your project involves procurement of a good or service, written procurement policies and procedures are required by the Uniform Guidance. Your ARC Project Coordinator may ask you for information on your written procurement policies and procedures before the project starts. It is critical for ARC grant recipients and subrecipients to have, and follow, robust, written procurement policies and procedures, and that each and every procurement meets the applicable procurement standards found in the Uniform Guidance. To view the procurement standards, please visit 2 CFR 200.317-327.

Contracting or Subawarding for Services

Prior ARC approval is required for any new subawards or services not previously identified in the original, approved proposal, or any approved revision.

It is important that, when planning for a contract or subaward under an ARC grant, you take care to properly identify the party as a contractor or subrecipient. Very different obligations apply to contractors and subrecipients, and specific oversight responsibilities apply to you as a contract administrator as opposed to a grantee with a subrecipient. You should review the factors identified in 2 CFR 200.331 to help you make this determination.

SAM.Gov Registration Requirements

In order to receive grant funds, all ARC grant recipients must maintain a valid full registration on the System for Award Management (SAM.gov). ARC grant recipients are responsible for ensuring that their registration does not become inactive and that the information in their SAM.gov record is accurate. If at any point during the grant period, a grantee's SAM.gov registration is inactive or the grantee is ineligible to receive federal funds, ARC will not be able to provide a grant payment.

Subrecipients do not need to complete registration in SAM.gov. However, first-tier subrecipients of ARC grantees (meaning organizations that directly receive funds from a grantee) must obtain a Unique Entity Identifier (UEI) from SAM.gov. This is a shorter process than completing full registration. Subrecipients of subrecipients are not required to register or obtain a UEI from SAM.gov. Grantees and subrecipients that provide a subaward to a subrecipient, or enter into any other "covered transactions" under 2 CFR Part 180, are responsible for verifying that their subrecipient is not excluded or disqualified. See 2 CFR 200.332(a).

Suspension, Debarment and Enforcement Remedies

All recipients and subrecipients of ARC funds are subject to suspension and debarment requirements at 2 CFR Part 180, which restrict awards, subawards, and contracts with parties that are debarred, suspended, or otherwise excluded from participation in federal assistance programs or activities.

Grantees and subrecipients that provide a subaward to a subrecipient, or enter into any other "covered transactions" under 2 CFR Part 180, are responsible for verifying that their subrecipient is not excluded or disqualified. See 2 CFR 200.332(a).

Further, grantees and subrecipients are responsible for ensuring compliance with the terms and conditions of the ARC award. In instances of non-compliance, ARC may require specific conditions (additional requirements on the grantee or subrecipient) or may terminate the award. Terminations may also occur for other reasons; please refer to the Termination and Other Enforcement Actions Article in your ARC Grant Agreement.

Supplemental Resource: ARC's Grant Compliance Guide

Project Reports

Project reports are used to communicate project activity, progress, as well as budgetary needs and spending for ARC funded projects, and are required for grants to remain active, to stay in compliance with federal regulations, and to receive award payments. To review the reporting requirements for an ARC project, refer to the ARC Grant Agreement.

Required Components of Project Reports

Both interim and final reports must include:

- *Progress Report:* Marked as 'interim' or 'final' as applicable.

- *Financial Report:* Each financial report is accompanied by data that is specific to the type of payment request being made:

    o   No Payment Request: You are not seeking reimbursement for this report period.

    o   Reimbursement: You are seeking reimbursement for this report period.

    o   Advance: You are requesting an advance payment for future work/report period.

    o   Reimbursement and Advance: You are seeking reimbursement for this report period as well as an advance payment for future work/report period.

Performance Measures: You must report actual outputs, and any progress toward outcomes, in interim reports throughout the duration of your project as well as in a final report once a project is completed. The documentation of performance measures is included in the progress report and consists of two elements: the input of quantitative data as it relates to achieved performance measures and any narrative that should accompany them. Actual performance measures should also continue to be tracked and recorded for the period agreed upon in your grant project proposal.

To review the list and definitions of outputs and outcomes that may be used for ARC projects, see the *Guide to ARC Performance Measures*.

*Grantees and subrecipients must have an accurate and reliable system in place for tracking and recording their performance measures, including a clear methodology for measurement and records that support the results. Common project management tools that are used for tracking outputs and outcomes include internal databases, excel sheets, and dashboards.

Format and Contents

Progress Reports

Progress reports may be completed by project contacts/collaborators of various role distinctions, however, each must be signed and certified by an authorized individual prior to ARC review. Those without signing authorization will have the option to edit and save reports for the authorized representative to then certify and submit to ARC for review. *Note: The Authorized Representative is the individual who signed the Grant Agreement.

All progress reports, both interim and final, must include narratives of each element listed below.

Background

Provide a short statement regarding the need for this project. What problems did you hope to solve when you applied for ARC funding?

Activities

Describe in detail what happened during this reporting period and explain how you implemented the approved scope of work. If there have been significant changes to your program during the course of the project, or if the project was implemented differently than described in your original proposal, please describe those changes here. If you retained a consultant, list their credentials and describe what they were paid to do.

Project Outcomes

Although it may be difficult to document outcomes (results) during the grant's performance period, grantees should describe any progress made to date. If outputs and/or outcomes will not be attained until after the end of the grant period, predict the likelihood of meeting those original targets—and give a date in your final report. Remember: you are responsible for accurately tracking and documenting all listed outputs and outcomes from the Approval Memo and the Project Classification tab in Pathways.

For the final report, write an assessment of how your project has impacted the problems you were trying to solve. Were there unexpected benefits? Shortfalls? Also, provide a summary table of the outputs and the outcomes achieved to date for the entire project performance period as applicable.

Problems Encountered

Describe any and all major issues that arose during the implementation of the project. What would you do differently if you were starting this project again? Knowing the types of difficulties you encountered and how you resolved them will guide us in offering technical assistance to future

grant applicants. Address each issue separately in its own section and describe whether and how the issues were resolved. Also, briefly discuss the implications of any unresolved issues or concerns.

Upcoming Activities (For Interim Reports)
Describe the project activities that are planned to take place in the months ahead and how they will be implemented. Note if there are any deviations from your original workplan and, if so, explain why and how you will address these changes in the context of your approved scope of work.

Performance Measures
Enter the outputs and/or outcomes achieved for the reporting period. Provide any statistical information that helps document the outputs and outcomes of your project to date. Data will vary according to the type of activities you have completed.

Program Continuation and Sustainability (For Final Report)
Describe how the project activities will be sustained without the grant funding. Did the project generate income? Will the program continue with other funding, and if so, what other sources of funds have been identified? If the program is to be discontinued, has it served its purpose, or is there still a need to solve the problems you were addressing? What additional steps are being taken to obtain other resources needed to continue the project?

Conclusions and Recommendations (For Final Report)
Summarize your entire project and the lessons learned during its implementation. Include a review of your successes and suggest ways that your experience may be helpful to others. If an outcome of your grant was to produce a plan or report, please upload this onto your electronic project record.

NOTE: If your report contains photos, you must have written permission or releases signed by the individuals and/or their guardians, to use photos of any recognizable individuals before sending them to ARC. Do not submit photo releases to ARC but retain them with your project files.

Do not submit to ARC protected personally identifiable information, e.g., social security numbers, birthdates (see 2 CFR 200.1), or other sensitive personal information. ARC's records of its doings and transactions are made available for public inspection pursuant to the Appalachian Regional Development Act of 1965, as amended, 40 USC 14308, and ARC's Open Records Policy (see the ARC Code Section 4.5). As such, any information received by ARC is subject to disclosure.

Additional Guidance for Final Reports Only
The final report is your opportunity to share the significant features of your project and present information about the results your project achieved. Each one of the narrative elements listed above should be reflective of the entire period of performance and be written as though the reader has no prior knowledge of your project. It must review and highlight all activities that occurred during the implementation of the project, including an assessment of all performance measures that were proposed in the ARC project application. If you proposed meeting the performance measures by the end of the performance period and have not met them, please include an explanation regarding why that is happening, in your judgment, and when you think the performance measures will be met.

Financial Reports and Payment

Financial reports are reviewed to confirm that expenditures are consistent with the approved budget and reflect the project's activities described in the progress report. Payments may be viewed and tracked on the *Financial Report Tab* in Pathways.

The ARC Grant Agreement outlines the conditions which must be met for a grantee to receive reimbursement for incurred expenses. Unless there are unforeseen or outstanding issues, payments are typically made within 30 days after a grantee submits both a detailed progress report and corresponding accurate and completed financial report. Payments will not be authorized until the ARC Project Coordinator has received and accepted both components.

Financial Report Contents

Current period costs must accurately reflect any expenses incurred on that project during the reporting timeframe. As you input this data into Pathways, keep in mind that both ARC and matching funds must be identified in financial reporting that accompanies all payment requests.

Forecast period costs must be entered to accompany any requests for an advance payment. See below for more information on requesting an advance.

*NOTE: The completion of a Financial Report is required even if no payment is requested for the reporting period.

Requesting an Advance Payment

ARC may advance funds when a grant recipient is requesting the minimum amount needed to meet an actual, immediate cash requirement necessary for carrying out the project. The grantee must also have adequate written procedures for advances and meet any applicable requirements for advance payments contained in 2 CFR 200.305. If requesting an advance payment, the grantee must include in the advance payment request a statement identifying the immediate cash need and explaining why an advance is necessary. Advance payments must be fully expended in a timely manner; this should be no later than the next reporting date. Actual expenditures should be listed as current period costs within your financial report. ARC does not permit advances of final payments.

Requesting a Final Payment

The final payment due to the grantee is contingent upon submission to ARC, and ARC's approval of the final project report. Final payments are processed when the project closeout is complete and may take longer than interim payment requests. The final reports must include the source(s) and amount(s) of all matching funds. The final report should also detail how all matching funds were used.

ARC Payment Process

ARC makes electronic payments to grantees using the Automated Clearinghouse (ACH) payment system. No payments will be made without a completed ACH enrollment form (SF-3881) on file. The SF-3881 enrollment form with instructions was included with the ARC Grant Agreement that was electronically sent to the project's Authorized Representative for signature. Information about your financial institution submitted to ARC on the SF-3881 must be consistent with your UEI registration in SAM.gov or payment will not be made. ARC does not issue paper checks as payment and only

makes payments electronically. ARC does not issue paper checks as payment and only makes payments electronically.

Subject to the terms and conditions of the ARC Grant Agreement, ARC typically withholds the final $100,000 or 10 percent of the grant amount, whichever is less, until the final reports are approved and the project is closed.

Submitting Reports

While those who have been named as contacts and collaborators on your grant may have the ability to prepare reports on Pathways, it is only the authorized representative who can certify reports for submission to ARC. Project reports will not be received for review by ARC until they are both certified and submitted. Once received, ARC Project Coordinators will review reports and approve them pending no error or omission.

Video Resource: Submitting Your Project Report in Pathways

Reporting Intervals

Interim Reports

The reporting period begins with the start date of the Grant Agreement. ARC requires interim progress reports for every 120-day period, unless otherwise specified in your grant agreement, and a final report at the end of your project's period of performance. Reports are due no later than 60 days after the close of the reporting period. If program activities did not start within this period, or if the project is delayed any time during the reporting period, narrative and financial progress reports are still required, explaining the reasons for the delay and how any problems are resolved.

All reporting activity takes place within Pathways under the *Post-Award Activities* tab. This is where you can generate and submit new progress and financial reports for each reporting period as well as submit payment requests to ARC. Prior to completing and submitting an interim or final report, grantees must complete the fields on the *Report Set-Up* tab to indicate the type of report and financial request being made for that reporting period.

Final Reports

The final narrative report and all financial documents are due within 60 days of the end of the project. After your ARC Project Coordinator accepts your report, he/she will prepare a closeout report which becomes the basis for closing the Grant Agreement. Upon approval of the final report, ARC will release any withheld project funds and make the final payment, as appropriate.

Extensions of Reporting Deadlines

Please plan ahead to ensure submission of reports prior to the 60-day deadline. ARC may consider extensions to the deadline only upon request from the grantee with an adequate justification but cannot guarantee approval of this request.

*Grantees must keep track of their reporting deadlines and submit reports at the time that they are due. Reports submitted even a day after the deadline are considered late and demonstrate non-compliance with the terms and conditions of your award.

Amendments

With few exceptions, changes to a project will need to be facilitated through Pathways and documented on your electronic project record. If you have any questions prior to initiating a request, however, reach out to your ARC Project Coordinator and State Program Manager, as applicable, to discuss any changes or adjustments that are needed. Grantees should not proceed with any activities or incur any costs outside of the approved project scope or budget until they receive confirmation from their ARC Project Coordinator that their amendment request has been approved.

In Pathways, all amendment requests are initiated in the same way: by accessing the *Amendments* tab on the dashboard of your electronic project record and creating a "new amendment" proposal. Make sure your request is clear and include supporting documentation accordingly.

Following the submission of your request, the Project Coordinator assigned to your project will review the request, classify it according to amendment type, and follow up with questions as needed. This communication will take place through Pathways and will be led by a number of annotation prompts that will facilitate the exchange. Following the resolution of all annotations as well as the subsequent certification of the Authorized Representative, the Project Coordinator will approve the request and decide if additional levels of review and approval are needed. If so, the amendment request will move forward in the approval process.

The level of review and approval, as well as the need for State concurrence for all amendment requests depends on a number of factors including project funding source (i.e., Area Development or competitive initiative), the nature and circumstances of the request, as well as whether the proposed amendment would result in significant change to essential project criteria (i.e., scope of work, funding amounts, key personnel, etc.). As noted above, your Project Coordinator will make that determination and will route your request through the appropriate process.

Video Resource: [Submitting Your Amendment Request in Pathways](#)

Schedule Changes
Changing the Period of Performance of an ARC Grant Agreement
If a project cannot be completed within the approved period of performance, you may request an extension. The request should be received and approved **prior to the project end date listed in the ARC Grant Agreement**. The request must include the reason for the extension and the proposed revision to the end date.

Scope Changes
Performance Measures, Area of Impact, and Other Changes
Requests for substantial changes to a project's scope of work must be reviewed and approved in a process that is similar to the review of the original application. This involves varying levels of review, approval, and state concurrence.

Cost Changes

Modifying the Budget of Your ARC Project

Prior ARC approval is required for changes to budget line items when the ARC grant amount is higher than the simplified acquisition threshold and all the budget transfers for your project total more than 10 percent of the project's total approved budget (both grant award and match funds). Note that the 10 percent threshold for budget changes is cumulative over the life of the project and that new budget line items cannot be created, nor can existing line items be removed, without prior approval from ARC.

 Budget changes that involve substantial revision to the scope of work or objectives of the project regardless of the grant amount or amount of money being moved always require prior ARC approval. Even minor budget revisions will need to be submitted to ARC and reflected accurately on your electronic project record in Pathways.

Funding Changes

Changes in Cost Share/Match

Prior ARC approval is required for any changes to the approved cost share or match provided. This includes additional funding from an approved match source as well as the addition or removal of an existing match source.

Addition or Reduction of ARC Funds

Prior ARC approval is required for any changes to initial funding amounts. This includes the addition, reduction, or the transfer of funds as approved in your ARC Grant Agreement.

Grantee/Fiscal Agent Changes

Changing a Key Person

Prior ARC approval is required for a change in a key person specified in the grant application or the Grant Agreement. This includes changes to the named Authorized Representative and/or Project Director. Any proposed changes to the named Authorized Representative, Project Director, Fiscal Agent, grantee name, or grantee organization, will require additional action beyond the submission of an amendment request. ARC will review and notify you accordingly.

Reducing Engagement

Prior ARC approval is required if you disengage from your ARC project for more than three months, or a reduction in the time and effort devoted to the project by 25 percent or more.

Making Changes to Grantee's Financial Institution

Complete a new ACH enrollment form if your financial institution changes during the period of performance for your ARC Grant Agreement. Include a note indicating that it is revised and submit the new form by email to ap@arc.gov. Alternatively, you may mail the form to the ARC Finance Office, 1666 Connecticut Ave. NW, Suite 700, Washington, DC 20009-1068. Be sure to include your full ARC project number on the form.

Record Keeping and Audits

Office of Management and Budget Guidance/Federal Regulations

ARC grants are administered in accordance with the Uniform Guidance at 2 CFR Part 200. As a grantee, you are expected to be familiar with, and ensure that the project adheres to, these regulations.

As mentioned, ARC now has a Grant Compliance Guide to help ARC grantees navigate both federal and ARC requirements. This guide can be accessed in both the Applicant and Grantee Resources section of ARC's website.

Audit Requirements for ARC Grants and Subawards

Grantees and subgrantees must maintain accurate and complete records relating to costs incurred under the ARC award, and make these available to ARC upon request, or for audit, as necessary, by the ARC Office of Inspector General (OIG) or the Government Accountability Office (GAO). Each year, ARC's Office of the Inspector General conducts random audits of selected ARC projects to ensure compliance with the Appalachian Regional Development Act, the ARC Grant Agreement, ARC policies and procedures, and federal regulations.

In addition, grantees and subrecipients that expend $1,000,000 or more of total federal awards (including any ARC grant) during their fiscal year must have a single or program-specific audit conducted for that year in accordance with Subpart F of 2 CFR Part 200. Grantees must ensure that their subrecipients comply with this audit requirement as applicable.

Common Audit Issues

If your organization is selected for an OIG audit, you are required to cooperate by providing all documentation and information requested. To get a better understanding of the procedural undertakings of the OIG in conducting audits as well as some common audit issues, you may access previous ARC OIG audit and inspection reports. Below are potential audit issues to be aware of:

- **General Financial Management.** Financial management systems must be sufficient to prepare reports, trace all funds, and ensure control and accountability over all property, funds, and assets.

- **Internal controls.** Policies and procedures must provide reasonable assurance that the ARC grant will be managed in compliance with applicable statutes, regulations, and grant terms and conditions.

- **Separate Accounts.** If your organization manages several grants, each grant must be accounted for separately, including activities, receipts, expenditures, and any matching fund documentation. Records must identify the source and use of funds provided for each grant-funded activity; no commingling of funds.

- **Documenting and Identifying Match.** If your project will be using in-kind or third-party property or services for matching purposes, records should be maintained including a listing of sources and documentation showing that the contributions were valued according to

federal cost principles at [2 CFR Part 200, Subpart E](#), and [2 CFR 200.306](#), e.g., appraisals, evidence of local rates of pay, etc. Documents such as invoices, volunteer time sheets, employee pay records, receipts, etc. should support all services donated to the project.

- **Procurement.** Written procurement policies and procedures should reflect requirements in federal regulations at [2 CFR 200.317-327](#), including (for grantees that are not state agencies) requirements relating to competition, standards of conduct prohibiting conflicts of interest, and cost and price analyses.

- **Direct/Indirect Costs.** With a few exceptions, indirect costs charged to an ARC project must be pursuant to (a) a federally negotiated indirect cost rate or (b) the de minimis rate provided in federal regulations, as documented in writing. The rate must be listed in the approved ARC budget. Indirect and direct costs must be treated consistently.

- **Equipment and Property.** Written equipment management and maintenance procedures must be established and followed, according to federal regulations and ARC requirements, including inventory requirements, filing of a notice of federal interest, and proper use.

- **Costs with Respect to Travel.** Travel claims should follow written policies of the grantee when consistent with federal regulations at [2 CFR Part 200](#), including but not limited to [2 CFR 200.475](#). Invoices should support costs and expenditures.

- **Timeframe of Eligible Expenses.** Expenses charged to the ARC project must be incurred during the grant period of performance. As noted previously, any grant period extensions must be approved by ARC before the grant period expires.

- **Support of Salaries and Wages.** All documentation relating to salaries and wages charged to your ARC grant should be maintained. Salaries and wages must reflect the actual activity of each employee, not a budget estimate.

- **Performance Measures.** Final reports should describe actual achievements rather than estimates, and tie objectives met to the objectives outlined in the Grant Agreement. Grantees and subrecipients must follow a documented method for tracking performance measures.

- **Allowable Costs.** All costs charged to your ARC grant must be allowable under federal cost principles, [Subpart E to 2 CFR Part 200.](#)

After Project Completion

Project Closeout

After your project is complete you must submit a final project report. Once this report has been reviewed and approved, your ARC Project Coordinator will prepare documentation to finalize the closeout process. You will receive an email notification when the project has been closed by ARC.

The project status in Pathways will also update to "Closed" and it will no longer show on the Approved/Active dashboard tab.

Post-Closeout Obligations

You must promptly liquidate all obligations incurred under your ARC grant and promptly return any unused advance payments to ARC.

Equipment Usage and Disposition

The federal government retains an interest in grant equipment purchased with ARC funds. Because of that, the federal government is entitled to an amount equal to its percentage share of the original purchase price multiplied by the current market value of the item or sale proceeds, as applicable (called "federal interest"). Additionally, titles to grant equipment are conditional and subject to some requirements. If an equipment item will no longer be needed for project purposes, please contact ARC to receive advance permission for alternative uses. State entities and those with items valued less than the equipment threshold do not need to reach out to ARC. See 2 CFR 200.313 for more information.

Verification Visits and Other Post Award Activities with ARC

You may have other opportunities to share the success of your project if it is selected for a case study or profile by ARC staff or if the project is selected to participate in an independent program evaluation. Grantees and subrecipients are required to comply with requests for information at these times even after the project is closed.

ARC's project investments are tracked in a variety of ways after a project is closed, including:

Project Performance Verification – The performance verification process is designed to confirm project outcomes after projects have been completed. ARC uses Pathways to collect this information via an electronic form which is sent through the system to grantees three years after the date of grant closeout. There may be times, however, when ARC staff will employ alternative methods to contact grantees to capture additional data on performance measures and grant implementation. This can take place at any point between project completion and several years after. ARC Code Section 8.9 requires grantees and subrecipients to cooperate with evaluators, e.g. by providing the documents requested and participating in interviews and surveys when asked.

Program Evaluations – Program evaluations are performed by an outside contractor and required by Congress. Program evaluations often involve large numbers of ARC grantees currently or formerly involved in similar types of activities, such as infrastructure, education, business development, etc.

Inspector General Audits, Inspections, and Investigations – Audits and investigations of the Office of Inspector General relating to agency programs and operations may occur during or after the project performance period (including after the award has been closed out by ARC).