

Grantee Checklist (RSBA-Administered Projects)

Working with your RSBA, and under your award terms, the ARC BABA Guidance, and the Grantee BABA Manual, you must:

1. Make sure no grant funds pay for a construction project unless all iron and steel, manufactured products, and construction materials are produced in the United States (see Section 4.4–4.6 for what each term means).
2. Factor BABA compliance into your project design and budget (see Section 1.3).
3. Make sure all procurement follows the Buy America Preference, including keeping records that show domestic sourcing or a written ARC BABA waiver for the item.
4. Include the ARC BABA term and condition and the [Sample Contract Clause and Bid Language](#) in all specifications, solicitations, and contracts.
5. Require the compliance certifications (**Certification of Compliance – [Subrecipient, Contractor, Subcontractor, Supplier/Manufacturer/Steel Mill](#)**) in all subawards and contracts, delivered to you and the RSBA before final closeout. Work with the RSBA to monitor subrecipients and to process any waiver requests.
6. Work with the RSBA to apply a general applicability waiver and document in the project file whenever a general applicability waiver is used; the RSBA must report it to ARC in the BAMR.
7. Submit project-specific waiver requests promptly through the RSBA using the ARC BABA Waiver Request Form (Appendix B). Note: a waiver cannot cover costs already incurred before its effective date.
8. Keep documentation that proves compliance — verify before and at the time of incorporation, collect manufacturer and all relevant self-certification letters, and retain records to satisfy audits.
9. Send BABA questions to your RSBA point of contact.

For more information, see the [Grantee BABA Manual](#) or the [RSBA BABA Manual](#).