

COMPLIANCE AND PROGRAM REVIEWS

New Guidance, Same Federal Foundation

HOMES • HEEHR • Tribal HEEHR

Consumer Protection Plan → FWA Plan

Fraud prevention front and center

Do Not Pay vetting

Screen contractors before they join your list

Fewer prescribed steps

Flexibility to tailor your program

New playbook, same rulebook. 2 CFR 200 still covers controls, costs, oversight, and records.

WHERE IT COMES UP FIRST

- **Installation verification**
- **Proof for retail, DIY, and mail-in rebates**
- **Contractor vetting and monitoring**
- **FWA plan follow-through**
- **Stacking without double funding**
- **Assessment costs disclosed up front**

The flexibility is yours. Document the decisions behind it.

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What the Reviews Tell Us: 2 CFR 200 Basics

Not a scorecard, a roadmap. The reviews predate the new guidance and point straight to 2 CFR 200 basics.



Document your risks

Review theme: *Risks and controls*

§ 200.303 internal controls

Risk assessment, RACM, written procedures



Oversee your implementer

Review theme: *Monitoring aligned to plan*

§ 200.318(b) or § 200.332

Desk, file, and field checks. Corrective action log.



Keep duties separate

Review theme: *Independent approvals*

§ 200.303; § 200.318(c)

Conflict disclosures, RACI, system permissions



Verify before you pay

Review theme: *Income and payee verification*

§ 200.403 allowable costs

Verify income per plan. Confirm installation and no double funding.

The tools are your choice. The controls aren't. *Build them early and they pay you back at every review.*

RACM = risk and control matrix (risk, control, owner, evidence) | RACI = who is Responsible, Accountable, Consulted, Informed

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A Renewed Chance to Move Ahead

Why it matters now: proposed 2 CFR 200 rewrite

Binding rules • 90-day suspension authority • Expanded termination with limited procedural protections

Not final before Dec. 12; formula-grant treatment unsettled. Either way, programs that can show their controls are best positioned.

1 Update

Revise plans, procedures, and contracts for the notices

2 Check

Check each proposed change against 2 CFR 200 before finalizing it.

3 Document

Decision record: what, why, rule, control, owner

4 Look back

Sample processed files; find, document, and resolve gaps

Launching soon? Build controls in from day one. **Already live?** Run the look-back alongside ongoing operations.

Clear records now can make monitoring, audits, and closeout easier.

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THANK YOU | NASEO ANNUAL MEETING

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