FAQs for Inventory of Supplies, Materials and Equipment

Q: How should grantees inventory and track supplies lent out to participants for grant training services?

A: The Uniform Guidance outlines the requirements for materials, supplies and equipment, including computing devices, which requires that items are tracked and safeguarded. These requirements are codified at 2 CFR 200.313, 200.314 and 200.453.

While the Federal Government does not define computing devices as equipment, it is valuable to the grantee. Therefore, it is necessary for grantees to protect and ensure these items are maintained, insured, have maintenance agreements in place, items are tagged appropriately and recorded in grantees system. Grantees also need to take reasonable actions to insure and protect the equipment. Tracking and safeguarding supplies, materials and equipment are allowable expenses to charge to the grant. Grantees should also allocate the cost across the programs that utilize the equipment, whether they are in house or lent out.

Q: Can grantees charge participants a refundable deposit fee when lending out electronic devices?

A: Yes, grantees can charge a nominal refundable deposit fee to participants when lending out electronic devices for the grant-training program. The grantee must include this information in their organizational policies and procedures, if they decide to charge a refundable deposit.

Additionally, grantees should have participants sign a written agreement, which includes the expectations and requirements they must adhere to when borrowing items for participation in distance learning related to grant. The agreement should address what happens if participants do not return items (i.e. no stipends/wages, incentives, removal from the program, ineligibility to receive certain services, no re-issuance, etc.). The electronic devices are considered government equipment. Therefore, grantees need to layout the stipulations and protocols for usage of the devices, such as participants cannot access bad websites, restrict use of the devices to grant related training services, disable downloading of apps, etc.
Q: Can grantees use grant funds to fix damaged electronic devices should they be damaged while participants are using them or upon return after use?

A: Yes, grantees can charge the grant to fix damages to electronic devices. However, the grantee must include this information in their organizational policies and procedures for the grant-training program.

Q: If participants do not return the electronic devices lent to them for participation in grant-related distance learning activities upon request or after completion of training, what recourse does the grantee have?

A: For items not returned, the grantee can withhold stipends/wage, incentives, credentials achieved, etc. from the participants until the items are returned. Additionally, the grantee can turn off internet device connections or possibly have software that deactivates the equipment if a participant does not return the device(s) upon request. These costs are allowable to charge to the grant.