

COMPLIANCE REQUIREMENTS QUICK REFERENCE

At-a-glance summary of major federal compliance requirements for infrastructure projects

Requirement	What It Requires	When It Applies	Key Documentation	Common Mistakes	Penalty
Environmental Review (NEPA)	Complete environmental assessment before ground disturbance	All federal infrastructure projects	NEPA determination letter, FONSI, or categorical exclusion	Starting work before clearance	All costs disallowed
Davis-Bacon Act	Pay prevailing wages; submit certified payrolls weekly	Construction >\$2,000 with federal funds	WH-347 payrolls, wage determination, employee interviews	Missing payrolls; wrong wage rates	Back wages; debarment
Buy America/BABA	Use domestic iron, steel, and manufactured products	Infrastructure projects with federal funds	Mill certifications, manufacturer certifications	Not verifying before purchase	Replacement required
Procurement (2 CFR 200)	Competitive bidding for goods and services	All purchases >micro-purchase threshold	Solicitation, bids received, evaluation, contract	Sole source without justification	Costs disallowed
Section 106 Historic	Assess impacts to historic properties	Projects affecting historic properties or sites	SHPO consultation, finding of effect	Skipping tribal consultation	Project halted
URA Relocation	Provide relocation assistance to displaced persons	Projects involving property acquisition	Relocation plan, notices, assistance records	Improper notices	Additional costs
Civil Rights	Non-discrimination in all project activities	All federally funded projects	Title VI assurances, LEP plan, complaint procedures	No complaint procedure	Funding withheld
Single Audit	Annual audit of federal expenditures	Entities spending >\$750K federal in fiscal year	Schedule of expenditures, audit report	Missing deadline (9 months)	High-risk status

Legend: ■ Green = Required for most federal projects ■ Yellow = May apply depending on project type

When in Doubt: Contact your program officer BEFORE spending funds or starting work. It's always easier to ask permission than forgiveness in federal grant management.

