KANSAS CDBG
POLICY BULLETIN 2026-03

Kansas
Department of Commerce

DATE: November 16, 2026
TO: CDBG Grantees and Grant Administrators
FROM: Andrew Hayman, CDBG Program Manager
RE: Equipment Inventory Recordkeeping

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The purpose of this bulletin is to clarify Equipment Inventory Recordkeeping for CDBG projects.

Before You Acquire Equipment

All equipment acquired with CDBG grant funds is required to be kept in an inventory record. Commerce expects this deliverable to be an itemized Excel worksheet with tracking for 2 CFR 200 requirements for the grantee. The worksheet should be maintained throughout the project, and this record will be reviewed at subsequent monitoring visits.

Pursuant to 2 CFR 200.313(d), those tracking elements are "description of the property, a serial number or another identification number, the source of funding for the property (including the FAIN), the title holder, the acquisition date, the cost of the property, the percentage of the Federal agency contribution towards the original purchase, the location, use and condition of the property, and any disposition data including the date of disposal and sale price of the property." This federal code speaks to all real property acquisitions but is inclusive of equipment and supplies.

Maintaining an inventory is an effort to prevent loss, damage, and theft of CDBG grant equipment, as well as capture any disposition.

Please ask Commerce for the FAIN if you do not know this number. Commerce has provided an example equipment inventory in the Resource Library.

Equipment Recordkeeping Requirements

Notation on invoices and receipts is not an equivalent effort to maintain an inventory record. Specifically the inventory should speak to cost per unit. Pursuant to 2 CFR 200.313(e)(1), items with a fair market value less than $10,000 per unit can be retained, sold, or otherwise disposed of with no further obligation to Commerce after grant closeout. If an item acquired is over $10,000 per unit (including any modifications for usability) then that physical inventory is required to be verified every two years past grant closeout for up to five years. For further disposition requirements, please refer to 2 CFR 200.313(e) and contact your project manager.