



FY 2026 Summary of Changes Revisions of HRSA General Terms and Conditions Effective October 1, 2025

We have updated the FY2026 Terms and Conditions with the following changes:

Editorial Changes

- Changed publication date at the top
- Renumbered sections as appropriate
- Added links as appropriate

Substantive Changes

- Stated that the HRSA Terms and Conditions apply to all discretionary awards with funds and award modifications with funds made on or after October 1, 2025.
- At the top of the document, added a statement for compliance with court orders.
- Removes all references to 45 CFR 75 because it no longer applies to HHS awards.
- Replaced all 45 CFR 75 citations with 2 CFR 200 citations.
- Throughout the document, updated the HHS Grants Policy Statement (GPS) to the new October 1, 2025, version.
- In section 1. *Administrative Requirements*, added new language about the date of applicability of the revised HHS GPS.
- In section 1. *Administrative Requirements*, added a section about applicable regulatory provisions.
- Replaced section 1.b. *HRSA Adoption of 2 CFR 200* with 1.b *Termination* and stated that prior to October 1, 2025, this award is subject to the termination provisions at [45 CFR 75.372](#). Starting on October 1, 2025, this award is subject to the termination provisions at [2 CFR 200.340](#).
- Changed section 1.e *Prior Approval* to 1.d. and:
 - Specified what constitutes significant rebudgeting (10% of total budget)
 - Added information about change of scope and rebudgeting into a new direct cost category.
 - Clarified that prior approval requests will soon be processed through Grant Solutions instead of HRSA Electronic Handbooks (EHBs).
- Removed section 5. *Termination*
- Moved Section 5.b *Appeal* to section 1.b *Appeals*.

- Removed the following sections because they are incorporated by reference in the updated GPS:
 - 1.g. *Cybersecurity*
 - 1.h. *Condition for Research Awards that Involve Procurement of Synthetic Nucleid Acids or Benchtop Synthesizers*
 - 2.b. *Indirect costs*
- In section 3.c *Program Income*, added a requirement for program income for-profit recipients.

Inquiries

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