



OFFICE OF LEGAL AFFAIRS

ADVISORY OPINION

Advisory Opinion # AO – 2010-004

SUBJ: Inclusion of Costs in PAI Subgrant Threshold under 45 CFR Part 1627

DATE: September 13, 2010

Questions Presented

Corporation funds to conduct activities related to the recipient's "programmatic activities." 45 C.F.R. §1627.2(b)(1). The regulation goes on to specify that such "programmatic activities" are those that the recipient might otherwise be expected to engage in itself, such as representation of eligible clients. *Id.*

Although this general definition would appear to cover services provided by a private

