



St Johns County Board of County Commissioners

GRANT ADMINISTRATION POLICY

Adopted by Resolution #2026-74

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St. Johns County Administration
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Contents

- Section 1 Purpose 3
- Section 2 Scope..... 3
- Section 3 Grant Administration Policy Statement..... 3
- Section 4 Code of Conduct, Key Roles and Responsibilities 3
 - 4.1 Code of Conduct..... 4
 - 4.2 Key Roles and Responsibilities 4
- Section 5 Fraud, Waste, and Abuse Reporting 6
- Section 6 Grant Administration Cycle 6
 - 6.1 Pre-Award..... 6
 - 6.1.1 Locating Funding Opportunities 7
 - 6.1.2 General Eligibility Considerations..... 7
 - 6.1.3 Application 7
 - 6.1.3.a Application Preparation..... 7
 - 6.1.3.b Application Approval by the Board 7
 - 6.1.3.c Application Submission 7
 - 6.2 Notice of Award 7
 - 6.2.1 Acceptance of Award 8
 - 6.2.2 Rejection of Award 8
 - 6.2.3 Changes to Award Prior to Acceptance 8
 - 6.3 Post-Award 8
 - 6.3.1 Grant Activities Management 8
 - 6.3.1.a Grant Program Management 8
 - 6.3.1.a.(1) Procurement using Grant Funds 9
 - 6.3.1.a.(2) Grant Funded Capital Assets Management 9
 - 6.3.1.a.(3) Acknowledgement of Support 10
 - 6.3.1.a.(4) **Deliverables** and Progress Reporting 10
 - 6.3.1.a.(5) Monitoring from Grantor..... 10
 - 6.3.1.b Grant Financial Management..... 10

6.3.1.b.(1) Advances of Award Funds	11
6.3.1.b.(2) Reimbursement or Financial Reporting	11
6.3.1.b.(3) Cost Sharing	12
6.3.1.b.(4) Personnel Cost.....	12
6.3.1.b.(5) Program Income	12
6.3.1.b.(6) Audits.....	13
6.3.1.c Grant Amendment and Extension	13
6.4 Closeout	14
6.4.1 Records Retention and Access	14
Section 7 Grant Subcontracting and Subrecipient Monitoring.....	14
7.1 Subcontractor (Vendor)	14
7.2 Subrecipient	14
Section 8 Policy Review and Update	15
List of Governing Regulatory Documents Reviewed	15
Section 9 Glossary of Terms*	15
FEDERAL AWARD ADDENDUM.....	19
Section 1. Purpose and Applicability.....	19
Section 2. Governing Federal Requirements and Order of Precedence	19
Section 3. Internal Controls	19
Section 4. Allowable Costs and Financial Management.....	20
Section 5. Cash Management and Advance Payments	20
Section 6. Procurement Using Federal Funds	20
Section 7. Subrecipient and Contractor Determinations	20
Section 8. Subrecipient Monitoring.....	21
Section 9. Remedies for Noncompliance	21
Section 10. Records Retention and Access	21
Section 11. Closeout	21
Section 12. Incorporation.....	21

* Any bold and italicized words and/or phrases are included in Section 9.

Section 1 Purpose

This policy establishes St. John's County's (County) uniform framework for managing the process of pursuing various grant opportunities to support County programs, services, and capital improvements. It ensures the efficient and effective use of awarded funds and holds staff accountable for fulfilling their responsibilities to the highest standards while complying with all regulatory and budgetary requirements of the Grantor and the County.

Section 2 Scope

This policy and all associated procedures will apply to all participants, unless they are exempted by the Board of County Commissioners (Board) by action recorded in the Board's minutes. For federal grants, whether received directly from a federal agency or indirectly through a pass-through entity, this policy shall be read in conjunction with the Federal Award Addendum, adopted by the Board of County Commissioners and incorporated herein by reference. In the event of any inconsistency between this policy and the Federal Award Addendum, the Addendum shall govern with respect to federal awards.

Section 3 Grant Administration Policy Statement

It is the policy of the Board that the County staff pursue grant funding opportunities that align with the County's mission, strategic priorities, and adopted plans. These opportunities should serve the best interests of the County and its residents, and aim to support and advance County programs, services, and capital improvements that the County cannot fund through general revenue collections.

Section 4 Code of Conduct, Key Roles and Responsibilities

Although the County does not have a centralized grants department, the Office of Intergovernmental Affairs (OIA) provides support to the departments as needed. All County personnel involved in preparing grant proposals and administering grant awards, including those managing grant-funded assets, are responsible for ensuring compliance with all grant terms, conditions, and regulatory requirements.

4.1 Code of Conduct

County employees serve as ambassadors of goodwill. As such, employees are expected to adhere to the regulations specified in Florida Statutes Section 112.313, which covers Standards of Conduct for Public Officers, Employees of Agencies, and Local Government Attorneys, as well as the provisions set forth in the St. Johns County Administrative Code, Title 409, Human Resources, Conduct; Title 411, Human Resources, Prohibition of Unlawful Harassment; and Title 120, Administrative Policy, Gift Policy.

Any employee found violating any portion of these standards of conduct and ethics may be subject to disciplinary action.

4.2 Key Roles and Responsibilities

BOARD OF COUNTY COMMISSIONERS

For each grant, the Board will approve a resolution that authorizes the County Administrator or their designee to execute all grant application documents on behalf of the Board.

Whenever a grant is awarded, the Board will approve a separate resolution authorizing the County Administrator or their designee to sign the grant award agreement and all related documents.

The Board shall make a final decision regarding the allocation of all grant funding and local match requirements.

COUNTY ADMINISTRATOR

The County Administrator or their designee will execute all grant-related documents as authorized by the Board's resolution. When submission deadlines are imminent, the County Administrator may sign grant-related documents on behalf of the Board. The Board shall ratify such signed documents at the next scheduled meeting.

COUNTY ATTORNEY

Legal review is required for all grant applications and grant award agreements. The department applying for or receiving a grant is responsible for coordinating this review with the Office of County Attorney's staff prior to submitting the application or agreement to the agenda manager for Board action.

OFFICE OF INTERGOVERNMENTAL AFFAIRS

The Office of Intergovernmental Affairs (OIA) provides support for the County's grants program and serves as a countywide resource for departments seeking grant and appropriations assistance. OIA may provide consultative and technical support throughout the full grant lifecycle, including identifying funding streams, collaborating on project concept development, supporting the preparation of competitive grant applications and appropriations requests, and assisting with maintaining compliance with grant requirements.

OFFICE OF MANAGEMENT & BUDGET

The Office of Management & Budget (OMB) is responsible for reviewing departmental requests to establish grant award budgets and any necessary budget amendments prior to approval by the Board.

CLERK OF COURT & COUNTY COMPTROLLER'S FINANCE DEPARTMENT

The Clerk of Court & County Comptroller's Finance Department (Finance Department) has the responsibility to ensure that all accounting transactions related to grant activities are recorded in accordance with generally accepted accounting principles within the grants module of the County ERP system. The Finance Department staff issues grant asset identifications, records asset acquisitions and disposals, and conducts a regular physical inventory of grant assets. Finance Department staff also assist some recipient departments with completing reimbursement requests and final closeout reporting. Additionally, the Finance Department staff annually prepares the SEFA (Schedule of Expenditures of Federal Awards) and provides external auditors with the necessary documentation to conduct the Single Audit.

DEPARTMENT RECEIVING GRANT (RECIPIENT DEPARTMENT)

The recipient department is responsible for the following functions of the grant cycle:

- researching and preparing grant proposals for department management review
- preparing grant proposals for review after department management approval
- arranging for a comprehensive grant proposal review by legal and OMB
- obtaining all necessary approvals
- requesting and obtaining appropriate Board authorization to apply for and accept a grant award
- developing grant award *implementation plans*

- creating grant award and maintaining all files and activities within the County ERP system
- managing grant programs and projects
- planning for grant-funded asset acquisitions and complying with all procurement requirements
- ensuring compliant grant **expenditures**
- managing all **subrecipients** or contractors
- coordinating review of the accounting transactions and grantor invoicing with the Finance Department
- preparing and submitting reports and reimbursement requests to grantors
- properly closing out grant projects
- coordinating grant closeout in the ERP grants module with the Finance Department

It is each department's responsibility to ensure staff working with grants are adequately trained in grants management and compliance requirements, including fiscal and programmatic compliance. This also includes training provided by the granting agency.

Section 5 Fraud, Waste, and Abuse Reporting

If a citizen or employee of the County has a concern about potentially fraudulent activity, they are encouraged to contact the County Administrator, OMB, Department Director/Program Manager, or the Clerk's Office of Inspector General to report their concerns.

Section 6 Grant Administration Cycle

6.1 Pre-Award

Grants pursued by the County recipient department's staff must be consistent with the County's mission, strategic priorities, or adopted plans, and no grant application shall be submitted without proper authorization and approval of the Board. Grants that align with the strategic priorities of the County should be evaluated for their overall impact and costs to the County, including matching requirements and new operating **expenses**: specifically, whether general fund revenue is necessary to bridge the gap between cash expended and revenue received, and whether general fund revenue is necessary to support the project after the grant funding ends. It is a

policy of the County to use federal and state grant funding to supplement, not supplant, existing local resources when funding projects, programs, and services.

6.1.1 Locating Funding Opportunities

It is the responsibility of each recipient department, with support from OIA, to research and identify relevant federal, state, local, or private financial assistance, and to present obtained information for review to the department head, followed by review from the County legal, budget, and senior management teams.

6.1.2 General Eligibility Considerations

The staff of the recipient department is responsible for verifying whether the County has met all statutory, regulatory, and other eligibility criteria or considerations necessary to qualify for a funding award.

6.1.3 Application

6.1.3.a Application Preparation

It is the responsibility of the recipient department to prepare and submit the grant application to the granting agency. Staff members should consult with the relevant County departments - such as OIA, legal, budget, and procurement - for assistance in preparing the application.

6.1.3.b Application Approval by the Board

No grant application shall be submitted without the proper signature approval of the Board authorized representative or designee.

6.1.3.c Application Submission

It is the recipient department's responsibility to submit an authorized application on time, secure budget for matching funds if required by the grantor, and ensure the allocation of County resources for the ongoing operation of the program or the maintenance of the asset after the grant period ends.

6.2 Notice of Award

The County holds significant legal, financial, and ethical responsibilities when accepting grant funding. The award acceptance process involves two parts:

- award notification, contract review, and negotiations if necessary

- County's approval to accept the award

6.2.1 Acceptance of Award

The recipient department is responsible for the timely review of the Notice of Award and the grant agreement by all required parties, including legal, budget, and senior management staff, prior to submitting it to the Board for approval.

6.2.2 Rejection of Award

If, during the review and negotiation phase, the County decides that it is no longer in the best interest of the County to accept the award, the recipient department will send a written notification to the grantor, including reasons for such a decision and any other required information as specified in the grant agreement termination clause.

6.2.3 Changes to Award Prior to Acceptance

Any proposed funding or scope-of-work changes should be reviewed by the relevant County departments – such as legal, budget, procurement, and senior management. The recipient department is responsible for ensuring the Board's approval of funding or scope-of-work changes prior to grant acceptance.

6.3 Post-Award

The recipient department and any other County staff managing grant agreements must ensure that grant funds are spent and documented accurately, consistently, and uniformly. Any deviations from the terms and conditions of the grant agreement require prior written approval from the granting agency.

6.3.1 Grant Activities Management

Grant agreements constitute legally binding contracts. It is the County recipient department's responsibility to carry out the project and/or activities associated with a grant to achieve its objectives, while adhering to all the terms and conditions prescribed by the grantor.

6.3.1.a Grant Program Management

It is the recipient department's responsibility to establish a grant award in the County ERP system, including all tracking components, copies of all grant agreements, and any other grant-related attachments of documents, to facilitate seamless administration of the grant lifecycle. All recipient departments should closely follow their grant

implementation plan and meet all deadlines for program completion and reporting.

6.3.1.a.(1) Procurement using Grant Funds

All procurement activities associated with grant-funded projects or programs shall follow the grantor's requirements and the County's Purchasing Policy and Procedures for the procurement of goods. Where there is a difference in requirements between the grantor and the County, the more stringent of the two policies must be used, unless the grantor mandates that the County follow the grantor's procurement requirements. It is the recipient department's responsibility to ensure that all grant funds are procured and expended accurately, in a timely manner, and in compliance with all applicable regulatory requirements.

As part of procurement requirements, it is the recipient department's responsibility to ensure that any subcontractor or **subrecipient** funded through a grant award is not prohibited from receiving federal or state funds due to suspension or debarment.

In addition to any other ethical rules or standards of conduct established by the County, no employee, official, or agent of the County shall participate in the selection, awarding, or administration of a contract supported by federal funds if participation creates an actual **conflict of interest**.

6.3.1.a.(2) Grant Funded Capital Assets Management

All property and equipment acquired with grant funds must comply with the grantor's requirements for property and/or inventory control. Purchased grant-funded assets shall be used exclusively for the grant project or program for which it was acquired. Grant-purchased assets must be properly maintained, tagged, and safeguarded, and all related records must be maintained to comply with the grantor's requirements. Once the grant award is closed and the asset is no longer needed for its originally authorized purpose, the recipient department is responsible for complying with the grantor's disposal requirements and, if required, obtaining all necessary

written approvals before disposal. A grant-purchased asset cannot be transferred to another project or department after the grant award is closed without the grantor's approval. Additionally, the Finance Department is required to inventory assets purchased with grant funds at least every two years.

6.3.1.a.(3) Acknowledgement of Support

The recipient department is required to review the grant award notice and/or agreement for the exact language and the mandatory inclusion of logos and links, and to comply with all requirements for **acknowledgement of support**.

6.3.1.a.(4) Deliverables and Progress Reporting

The recipient department acts as the primary point of contact with the Grantor regarding program performance, operational needs, and **monitoring**. They are responsible for conducting and/or coordinating all internal program **monitoring** and ensuring that all required program reports are prepared and submitted by or before the deadlines outlined in the award agreement.

6.3.1.a.(5) Monitoring from Grantor

The staff of the recipient department is responsible for ensuring that all authorized **monitoring** teams have access to all essential documentation during their site visit or desk review, including organizational structure and governance, contracts, **subrecipients**, procurement policies and procedures, financial management policies and procedures, and all relevant programmatic activities.

6.3.1.b Grant Financial Management

No grant funds shall be disbursed until a Board agenda item and appropriation request have been approved by the Board, an award has been established, and required documentation is complete.

Expenditures under most cost-reimbursement grants are governed by the cost principles established by federal, state, and other grantors and must conform to their respective policies, grant-specific provisions, and County policies.

Grant funds shall be used only for grant-related **expenses** and shall be expended within the performance period identified in the grant agreement.

The recipient department is responsible for performing monthly reconciliations of award **expenditures** to ensure they are allowable, allocable, necessary, and reasonable in accordance with the terms and conditions of the grant agreement. Additionally, they must verify that **expenses** are supported by adequate documentation and charged to the correct accounts within the allowable period.

Recipient departments responsible for managing federal funding provided to the County in response to a federally recognized disaster must ensure that the County makes every effort to prevent duplication of benefits when another source of financial assistance is available to cover the same need.

6.3.1.b.(1) Advances of Award Funds

Advanced payments must be deposited into and maintained in insured interest-bearing accounts.

The County may retain an allowable amount of interest earned for administrative **expenses**. Any excess interest earned will be remitted to the federal awarding agency or **pass-through** entity via an electronic method, following specific instructions, unless the grantor authorizes the County to retain such funds for other projects.

6.3.1.b.(2) Reimbursement or Financial Reporting

It is the responsibility of the recipient department staff to ensure that financial reports and reimbursement requests for grant **expenses** reflect the actual amounts posted to the general ledger, serving as the source for all invoice totals. The recipient department must also include sufficient documentation of eligible costs and proof of payment for **expenses** incurred during the reporting period. Costs included in the reimbursement request must be necessary and reasonable for the performance of the grant award.

6.3.1.b.(3) Cost Sharing

The recipient department should carefully review the grant award notice and agreement and keep in close communication with the grantor to ensure that cost-sharing activities and documentation align with the grantor's expectations.

At a minimum, the portion of program or project costs not paid by the grantor (**cost sharing**), including the mandated level of cost share (local match) that must be provided, must be documented in the same way as **expenses** claimed for reimbursement. It is the recipient department's responsibility to ensure that appropriate and verifiable documentation is maintained for all **expenses** used to satisfy cost-sharing obligations.

All revenues and **expenses** related to grant matching requirements shall be entered into the County's ERP system and coded to the respective grant to ensure effective **monitoring**.

With prior approval from the awarding agency, **program income** and/or non-cash contributions from other entities may be used to meet the cost-sharing or matching requirements of the grant award.

6.3.1.b.(4) Personnel Cost

All personnel costs will be managed in accordance with the grant agreement requirement and County Human Resources policies and procedures, including any specific individual payment plans for disaster recovery programs.

Salaries and wages of employees used to satisfy cost-sharing or matching requirements of grant awards must be documented in the same manner as allowable costs claimed under those awards.

6.3.1.b.(5) Program Income

The recipient department should make every effort to identify and estimate the proposed **program income** when submitting a grant application. If the **program income** is not identified at the application stage, the grantor will be notified of the

program's potential to generate income once relevant information becomes available to establish appropriate usage guidelines.

All income resulting from a grant-funded project or program shall be managed and maintained as established in the grant agreement.

All **program income** must be reported and accounted for during the award's performance period using the utilization method approved by the Grantor.

6.3.1.b.(6) Audits

The County is required to engage a qualified auditor to prepare an annual audit and to perform a single audit per the requirements of 2 CFR 200.500-521. The Finance Department staff will annually prepare the Schedule of Expenditures of Federal Grants (SEFA) as required. If audit findings are identified, the OMB will be responsible for preparing a Corrective Action Plan outlining how the findings will be corrected. This Corrective Action Plan may require participation from OMB and recipient departments if their department's grants are involved. The Finance Department staff will ensure that single audits are submitted to the required federal audit oversight agencies in a timely manner.

6.3.1.c Grant Amendment and Extension

If the funding and/or scope of work for a grant-funded project requires an amendment or the timeline needs to be extended, the recipient department must ensure that all parties involved in implementation follow the procedures in the grant agreement or the grantor's guidelines when requesting an amendment or extension.

The recipient department should not allocate funds beyond the initial award until all amendment requirements are met and the grantor's approval has been received.

6.4 Closeout

The recipient department must submit all financial, performance, and other reports as specified in the grant closeout terms and conditions. The closeout process should be coordinated with the Finance Department.

6.4.1 Records Retention and Access

All grant financial records, supporting documentation, and any other records related to the grant shall be retained by the County in accordance with the requirements of the grantor agency and the provisions outlined in the St. Johns County Administrative Code, Title 113, Records Management.

Section 7 Grant Subcontracting and Subrecipient Monitoring

The County may encounter a situation where it lacks sufficient resources to adequately accomplish all or some of the grant objectives and must therefore engage other entities to undertake specific functions. These activities will be mandated through the form of a subcontract or **subaward**.

7.1 Subcontractor (Vendor)

Vendor relationships will be managed in accordance with the County Purchasing Policy. It is the recipient department's responsibility to ensure that all procurement requirements and obligations are met.

7.2 Subrecipient

All grant requirements imposed on the County will extend to any **subrecipient**, and it is the County's responsibility to ensure that the **subrecipient** complies with the grant provisions. All **subawards** must include language requiring **subrecipients** to meet the grant requirements, specify terms and conditions for the closeout of the **subaward**, and grant permission for the County, auditors, and other authorized personnel to access the **subrecipient's** records and financial statements as permitted by law.

Section 8 Policy Review and Update

It is the responsibility of the County Administrator or their designee to ensure this policy is reviewed annually. If this document requires any modifications, it may be updated and/or amended at any time through a majority vote of the Board.

List of Governing Regulatory Documents Reviewed

County staff reviewed the following regulatory documents during the development of this policy:

FEDERAL:

- 2 CFR Part 200 Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- 44 CFR 206.191 Duplication of Benefits
- Single Audit Act of 1984, as amended in 1996
- Federal Grant and Cooperative Agreement Act of 1977, as incorporated in Title 31 Section 6304 of the U.S. Code.

STATE:

- Related sections of the Florida Statutes Chapters 112 Part III, 125, 215, 218 Part III and VII, 274, 287
- Florida Administrative Code
- Rules of the Auditor General, Chapter 10.550, Local Government Entity Audits

LOCAL:

- St. Johns County Administrative Code
- St. Johns County Purchasing Policy

Section 9 Glossary of Terms

Acknowledgement of Support - Grant acknowledgment requirements generally involve specific wording, logos, and disclaimers in publications, press releases, and websites, including the funder's name, grant number, and a statement of responsibility for the content. Federal grants often require specifying the percentage and dollar amount of total costs covered by federal funds, along with a disclaimer stating that views are those of the authors, not the agency.

Advance Payment – a payment that a grantor makes before the grantee disburses the funds for program purposes.

Conflict of Interest – a conflict of interest occurs when an individual’s personal interests (family, friendships, financial, or social factors) could compromise his or her judgment, decisions, or actions in the workplace. See St. Johns County Administrative Code Section: Human Resources 409.6 Conflict of Interest.

Cost Sharing – the portion of project costs not paid by the grantor’s funds or contributions. This term includes matching funds.

Deliverables – the agreed-upon tasks that are completed and submitted within a scheduled time frame. A written report is typically required to accompany each deliverable.

Expenses (or expenditures) – charges made by a grantee to a program or project funded by a grantor.

Grant agreement or grant – in general, a legal instrument of financial assistance between a grantor and a grantee to carry out a public purpose authorized by law.

Grant implementation plan – a document that lists the action steps needed to achieve a project's goals and objectives. A plan details the list of work that must be done, including the action steps, who is responsible for ensuring the work is completed, and the timeframe for completion.

Internal Controls – processes designed and implemented by the grantee to provide reasonable assurance regarding the achievement of objectives in the following categories: effectiveness and efficiency of operations, reliability of reporting for internal and external use, and compliance with applicable laws and regulations.

Monitoring – post-award process of overseeing, tracking, and reporting on the progress, performance, and financial management of grant-funded activities to ensure compliance with the terms and conditions and the achievement of intended outcomes. Common monitoring activities include desk reviews, site visits, field inspections, and audits.

A **pass-through entity** for grants is a non-federal organization (like a state agency) that receives a federal grant and then distributes (subawards) portions of those funds to other organizations (subrecipients) to carry out specific parts of the federal program, acting as an intermediary that manages funds and oversees the end recipients.

Program Income – gross income earned by the grantee that is directly generated by a supported activity or earned as a result of the grant award during the period of performance.

Recipient Department – County department that applied for and received grant funding to support their program, service, or project.

Subaward – an award provided by a pass-through entity to a subrecipient for the subrecipient to contribute to the goals and objectives of the project by carrying out part of the award received by the pass-through entity.

Subrecipient – an entity that receives a subaward from a pass-through entity to carry out part of a grant award.

Federal Award Addendum

FEDERAL AWARD ADDENDUM

To the St. Johns County Grant Administration Policy

Section 1. Purpose and Applicability

This Federal Award Addendum (“Addendum”) is adopted to ensure St. Johns County’s compliance with all applicable federal statutes, regulations, and award conditions governing federal financial assistance, including federal funds received directly from a federal awarding agency or indirectly through a pass-through entity.

This Addendum applies to all federal awards, regardless of funding source, department, or program, and shall supplement the County’s Grant Administration Policy. In the event of a conflict, this Addendum shall control for matters involving federal awards.

Section 2. Governing Federal Requirements and Order of Precedence

All federal awards administered by the County shall comply with 2 CFR Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, as amended.

For federal awards, the following order of precedence shall apply in the event of any inconsistency:

1. Federal statutes and regulations;
2. Federal award terms and conditions;
3. Pass-through entity requirements;
4. This Federal Awards Addendum;
5. The County’s Grant Administration Policy; and
6. Other County policies and procedures.

Section 3. Internal Controls

The County shall establish and maintain effective internal controls over federal awards in compliance with 2 CFR §200.303, designed to provide reasonable assurance that federal awards are managed in accordance with applicable laws, regulations, and award terms.

Internal controls shall be consistent with recognized federal standards, including the U.S. Government Accountability Office (GAO) Standards for Internal Control in the Federal Government (Green Book) or the Committee of Sponsoring Organizations of the Treadway Commission (COSO) framework.

Section 4. Allowable Costs and Financial Management

All costs charged to federal awards shall comply with 2 CFR Part 200, Subpart E – Cost Principles, and must be allowable, allocable, reasonable, and adequately documented.

Federal funds shall be expended only for authorized purposes, within the approved period of performance, and in accordance with the terms and conditions of the federal award.

Section 5. Cash Management and Advance Payments

For federal awards, advance payments shall be limited to the minimum amounts necessary and timed to coincide with the immediate cash needs of the grant-funded activities, in accordance with 2 CFR §200.305.

The County shall minimize the time elapsing between the receipt of federal funds and their disbursement and shall comply with all applicable interest-bearing account and interest remittance requirements.

Section 6. Procurement Using Federal Funds

Procurement transactions involving federal funds shall comply with 2 CFR §§200.317–200.327. Where procurement standards differ, the more stringent requirement shall apply unless otherwise mandated by the federal awarding agency.

Section 7. Subrecipient and Contractor Determinations

Prior to issuing any subaward or contract funded with federal grant funds, the County shall perform and document a subrecipient versus contractor determination in accordance with 2 CFR §200.331.

Section 8. Subrecipient Monitoring

When the County acts as a pass-through entity, it shall comply with 2 CFR §§200.331–200.332, including risk assessments and ongoing monitoring.

Section 9. Remedies for Noncompliance

In the event of noncompliance with federal award requirements, the County may impose remedies consistent with 2 CFR §§200.339–200.343.

Section 10. Records Retention and Access

All records related to federal awards shall be retained in accordance with 2 CFR §200.334, but in no event for less than five (5) years following final closeout.

Section 11. Closeout

Federal award closeout shall be completed in accordance with 2 CFR §200.344 and the terms and conditions of the applicable federal award.

Section 12. Incorporation

This Federal Award Addendum is incorporated into and made part of the St. Johns County Grant Administration Policy and applies to all federal awards administered by the County on or after its effective date.