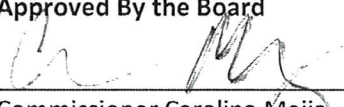
 <div> <b>THURSTON COUNTY</b>  <i>Washington</i>  <small>Est. 1852</small> </div>		<b>Policy Title</b> Grants Management <small>(Create title as a hyperlink to the most recent version)</small>	
<div>POLICY</div>		<b>Number</b> 101	<b>Effective Date</b> 4/26/2022
		<b>Latest Approval Date</b> 4/26/2022	<b>Approved By the Board</b>  Commissioner Carolina Mejia Chair of the Board
		<b>Next Review Date</b> 05/01/2025	<b>Policy Owner Title</b> Financial Services Manager
POLICY INTENT			
<b>Purpose</b>	All County Offices and Departments shall participate in the uniform grants administration program prescribed in this policy to ensure that state, federal, and pass-through grants and other financial assistance: <ol style="list-style-type: none"> <li>1. Further core County functions;</li> <li>2. Align with the County Strategic Plan and Budget;</li> <li>3. Provide for activities and assets that are in the best interest of the County;</li> <li>4. Are administered uniformly throughout the County in accordance with best management practices and the requirements of State and Federal law.</li> </ol>		
<b>Scope</b>	Organization Wide <input checked="" type="checkbox"/> Internal Only <input type="checkbox"/> Direct Impact to Residents		
<b>Office/Department Documents on this subject permitted?</b>	<input checked="" type="checkbox"/> Yes, Offices and Departments may develop their own internal policies. Internal policies may be more detailed or more stringent than the minimum County requirements listed in this policy and must be consistent with this county-wide document.		<input type="checkbox"/> No
POLICY STATEMENT			
<b>A. General Policy</b> <ol style="list-style-type: none"> <li>1. This policy provides guidance on the accounting, management reporting and auditing of grants and other financial assistance with emphasis on awards from federal and state agencies. Hereinafter, grants and other financial assistance will be collectively referred to as "grants."</li> <li>2. This policy shall be used in conjunction with Thurston County grants management procedures that support this policy.</li> </ol>			

#### **B. Applying for Grants – all awards**

1. Each Office/Department is encouraged to seek grants and other forms of financial assistance to support activities and assets that are determined to further core County functions, are consistent with the County's mission and strategic priorities, and that provide for activities and assets that are in the best interest of the County and its residents.
2. The Grant Review Team reviews new grant applications for grants of \$10,000 or more to ensure compliance with internal goals, policies and procedures, timetables, ongoing budget obligations and audit standards.
  - 2.1. Board of County Commissioners (BoCC) approval is required prior to applying for:
    - 2.1.1. New awards of \$10,000 or more
    - 2.1.2. Renewal/Continuation/Revision Applications that would:
      - 2.1.2.1. Fund new County FTEs or increase existing County FTEs;
      - 2.1.2.2. Result in a cumulative award amount of \$10,000 or more;
      - 2.1.2.3. Result in new or expanded programs or services.
  - 2.2. The BoCC has delegated direct approval of grant applications to the Assistant County Manager or their designee in their absence. Grant Application Approval Requests and Grant Notifications shall be submitted to the Assistant County Manager for review no later than 30 days prior to the grantor agency's application submission deadline OR as soon as Notice of Funding Opportunity has been received.
  - 2.3. The Assistant County Manager may waive the application approval process or conditionally approve a grant application approval request when it is deemed in the best interest of the County.
3. The final acceptance of all grant funds is made by the BoCC through direct approval or through approval of the biennial budget process.

#### **C. Special considerations for Federal Awards**

1. Federal grant funds shall only be sought and used to supplement and not supplant available State and County project funding, unless expressly authorized by law or in writing by the Federal grantor agency.
2. Offices and Departments will use the single Unique Entity Identifier (UEI) assigned to Thurston County for federal awards management when applying for federal grant funds.

#### **D. Budget Authority Required**

1. If the grant was not anticipated in the current budget, upon receiving approval of the grant award, each office/department submits a budget amendment request in the budget system for budget authorization.

#### **E. Award Administration – All Awards**

1. Each Office/Department receiving an award is responsible for carrying out the scope of the award and all related activities.
2. All awards shall be administered in accordance with award-specific terms and conditions; grantor entity guidelines, program guidelines; applicable state and federal regulations; and County policies and procedures. It is the Office or Department's responsibility to know all specific requirements under the existing state and federal laws and regulations, and any other special requirements and conditions stipulated under individual grant agreements.



3. Where there is a difference between County policy and state or federal requirements, the most restrictive requirement shall govern.
4. County Offices and Departments shall coordinate with Financial Services to develop the required grant award and project cost tracking hierarchy and set-up the general ledger account combinations to meet all budgeting, control, accounting, and reporting requirements.
5. All grant-funded goods or services shall be procured in accordance with [Thurston County Procurement Policy 201](#) and related procedures.
6. County Offices and Departments shall prepare and submit in a timely manner all required and applicable reports under grantor-specific regulations to the grantor or, if a subrecipient, to the pass-through entity.
7. The County shall establish financial management systems that comply with standards set in the Uniform Guidance and/or grantor requirements as specified in the grant agreement or program guidance.
8. The Auditor's Office, Financial Services Division prepares required annual financial accounting statements and schedules on all grant awards and as necessary assist offices and departments with financial monitoring of individual grants, including audits of sub-recipient activity.

#### **F. Award Administration – Federal Awards**

1. In addition to the requirements of Section 2 above, direct and indirect (pass-through) federal awards and amendments made after December 26, 2014 shall also be administered in accordance with Title 2 of the Code of Federal Regulations, [Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards](#) ("2 CFR 200", "Uniform Guidance" or "Super Circular").
2. County Offices and Departments shall prepare and submit in a timely manner all required and applicable reports required under [2 CFR 200 Subpart D – Post Federal Award Requirements](#).
3. Each Office or Department is responsible for ensuring that any program income related to a federally funded project is identified and tracked according to the requirements of [§200.307](#) and Thurston County grants management procedures.

#### **G. Pass-Through Grants**

1. Each office/department receiving a grant ensures that all vendors and subrecipients providing or receiving services and funds involving a grant are eligible and in compliance with state and federal statutes and regulations prior to award.
2. All pass-through grants to the County shall be reported in the annual financial statements. Grant activities shall be accounted for as revenues or expenditures in governmental or proprietary funds as appropriate.

**H.** County Offices and Departments shall capture, track, and report total pass-through funds to other organizations.

## **I. Subaward Agreements**

1. Offices/departments must obtain prior written approval from the Federal or pass-through funding agency to subaward out non-construction services using Federal funds when required by §200.308(c)(1) – (8).
2. Each subrecipient agreement (subaward) and each subsequent modification or amendment must be clearly identified to the subrecipient as a subaward and provide the federal award information outlined in §200.332(a) (1) – (6).
3. Each subaward will include appropriate Single Audit Act requirements pursuant to 2 CFR 200, Subpart F – Audit Requirements, including:
  - 3.1. Subrecipient compliance with the Single Audit Act of 1984, as modified
  - 3.2. Access by the County or an independent auditor to all records, including financial records, and personnel as necessary to conduct an audit.
  - 3.3. Provision by the subrecipient of any required Single Audits to the County within the time limit set forth in the Single Audit Act.
  - 3.4. Notification by the subrecipient and suspension or termination of the subaward contract for cause in the event of subrecipient suspension or debarment.
  - 3.5. Verification by the subrecipient of non-suspension and non-debarment status prior to issuing lower-tier subawards or contracts.
4. Offices/departments will verify that subrecipients whose aggregate Federal award funding expended during the respective fiscal year equaled or exceeded \$750,000, including direct and pass-through, were audited in accordance with §200.501.
5. Offices/departments must review subrecipients' audit reports annually to ensure compliance in Federal program areas in which the Office/Department passed through Federal award funds to the subrecipient, per §200.332 (b) (2).
6. Suspension and Debarment
  - 6.1. County offices/departments will ensure and document that no agreement for goods or services is entered into with any entity or person (including subrecipients, contractors, vendors, and consultants) who has been disqualified (suspended or debarred) from participation in Federal programs or activities. in accordance with §200.214.
  - 6.2. County offices/departments will ensure that subrecipients, contractors, vendors, and consultants include suspension and debarment requirements in lower-tier agreements under the award.
7. All subawards contracts, regardless of the source of grant funds, shall include a requirement for access to all records, including financial records, and personnel by the county or an independent auditor at the county's discretion.

## **J. Subrecipient Risk Assessments and Monitoring**

1. County offices/departments will evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward in accordance with the risk factors outlined in §200.332(b)(1)-(4) to determine the appropriate levels of subrecipient monitoring and to determine whether additional subaward conditions should be imposed upon a subrecipient, per [§200.332\(c\)](#) and [§200.208](#).
2. County offices/departments must conduct risk assessments prior to entering into any subaward and subsequent subaward amendment, and annually thereafter for the life of each subaward.



3. County offices/departments will monitor subrecipient financial and program performance to ensure that subawards are used for authorized purposes; that they are in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved, in accordance with §200.332(d).
4. Each subaward must be monitored in accordance with the grant requirements. Because the nature of grant funded activities varies depending on the program-specific needs and compliance requirements, offices/departments will use their best judgement in developing monitoring schedules and systems tailored to their programs' needs.

**K. Subrecipient and Contractor Payments**

1. Offices/departments must ensure that payments are made to subrecipients and contractors in accordance with contract provisions.
2. The preferred method of payment is reimbursement. Payments will be made within 30 calendar days unless the county has a reasonable belief the invoice is improper.
3. For federal funds, an advance payment may be made in accordance with §200.305(b)(1-6), provided the time between the transfer of funds to the subrecipient and when payments are disbursed by the subrecipient are minimized.

**L. Procurement Using Federal Funds**

1. When procuring goods or services using direct or indirect (pass-through) Federal award funds, offices/departments must utilize the procurement methods outlined in Procurement Policy 201, Procedure 201-01 Procurement Decision Matrix, and will also comply with Federal procurement standards outlined in §200.318 through §200.327 and 2 CFR Appendix II to Part 200 – Contract Provisions for Non-Federal Entity Contracts Under Federal Awards.

**M. Revenue Recognition Guidelines for Grants**

1. Recognition of grant revenue is required unless the revenue is not measurable or not probable of collection. Substance over form shall be used when determining the applicability of this policy to other similar receipts.
2. Recognition of grant revenue shall be done in accordance with Generally Accepted Accounting Principles.
3. Offices and Departments shall ensure that all accruals of grant revenues and deferrals of grant receipts are recorded appropriately in the general ledger at year-end.

**N. In-Kind Assistance**

1. When grants include in-kind donations and no County resources are used, a revenue and corresponding expenditure equivalent to the fair market value of the commodity (or the assessed value provided by the grantor) should be recognized in order to meet cost sharing or matching requirements.

**O. Allowable Costs**

1. The Internal Auditor may review grants to determine compliance with applicable statutes, relevant OMB circulars, and county administrative requirements to ensure eligible costs.
2. Where grants specify a period of availability, only costs incurred during the period and any pre-award costs authorized by the grantor may be charged to the grant.

3. County Offices and Departments shall follow the principles and standards set in [2 CFR 200 Subpart E - Cost Principles](#) in determining allowable costs under federal financial assistance awards.
4. County Offices and Departments shall follow guidelines set in award documents and RCW for state financial assistance awards.
5. The County, state, and federal governments recognize indirect costs as legitimate grant expenses and the County shall take advantage of all opportunities provided under general rules and specific grant awards to recover indirect costs.
6. County Offices and Departments shall use indirect cost rates developed under the Thurston County Auditor's Office Annual Cost Plan and/or appropriate departmental indirect cost allocation plans as a means of equitably recovering indirect costs from both federal and non-federal grant programs.
7. Departments shall ensure indirect costs that are charged to grants are allocated in a fair and consistent manner using reasonable and verifiable allocation bases.
8. Salaries and wages charged to grants shall be supported by detailed time and effort documentation (timesheets) and shall be recorded timely in the appropriate grant reporting period.
9. Allocation of paid time-off amounts shall be calculated using a consistent basis with the results of the allocation periodically reviewed by management.
10. Where a grant requires matching funds, the County shall make use of only eligible resources as stipulated under federal or state rules or the grant agreement. The source and the amounts incurred and claimed as matching costs shall be fully documented.

**P. Grant Refunds and Disallowed Costs**

1. When the grant award period has ended and there are unspent proceeds from an advance on the grant, funds must be returned to the grantor in a timely manner unless another disposition method is specified by the grantor.
2. Disallowed costs and costs found to be ineligible for grant reimbursement through internal review or other means shall be covered by another eligible source of funding within the Office or Department in the year that the costs were determined to be ineligible.

**Q. Asset Management**

1. Grant-funded capital assets shall only be used for purposes authorized under the grant or program. Any diversion for other purposes requires written approval by the grantor agency.
2. Disposition of grant-funded capital assets shall be in accordance with the grant agreement. If the agreement is silent, the grant coordinator must obtain and follow asset disposition instructions from the grantor entity in writing.

**R. Grant Closeout**

1. The authority to expend the funds for a grant or contract expires upon completion of the grant or at the end of the funding period.
2. Within 90 days of the end date of the grant or contract, it is the responsibility of the Office or Department administering the grant to complete the grant closeout checklist.

## **S. Audits**

1. Centralized internal control policies, guidelines and procedures related to grants shall be developed by the Thurston County Auditor's Office. County Offices and Departments should develop supplemental in-house internal control policies and procedures as necessary for special grant situations. Specific guidance on establishing internal controls over compliance with federal grant requirements may be found in [§200.303 \(a\) – \(e\)](#).

For federal awards, the County shall comply with the audit requirements contained in [2 CFR 200 Subpart F - Audit Requirements](#) and OMB Compliance Supplements specific to the year of the award.

## **T. Lobbying Restrictions**

1. Applicants for and recipients of a federal contract, grant or cooperative agreement cannot use federal funds to lobby an officer or employee of any federal agency or member of Congress.
2. Thurston County, a political subdivision of the State of Washington, is the recipient of certain federal grants and cooperative funding agreements, and shall comply with the following provisions:
  - 2.1. [§200.450](#) "Lobbying", which incorporates the provisions of [31 U.S.C. §1352](#) the "New Restrictions on Lobbying" published at 55FR 6736 (1990).
  - 2.2. OMB guidance and notices on lobbying restrictions.
3. These provisions prohibit the use of federal funds for lobbying the executive of legislative branches of the federal government in connection with the award and require the disclosure of the use on non-federal funds for lobbying. Executive lobbying costs (i.e. costs incurred in attempting to improperly influence either directly or indirectly and employee or officer of the executive branch of the federal government to give consideration or to act regarding a federal award of regulatory matter), are unallowable costs.
4. A non-federal entity receiving in excess of \$100,000 in federal funding shall submit a completed Form SF-LLL (or any successor form) regarding the use of non-federal funds for lobbying. See the Grants Manual for more information regarding this requirement and the process for submitting required disclosures.



DEFINITIONS AND ACRONYMS	
<b>Application</b>	Any proposal, application, or other request for funding by an agency external to Thurston County.
<b>Award</b>	A legal instrument of financial assistance between another agency and Thurston County, the principal purpose of which is to transfer anything of value from the awarding agency to the County to carry out a public purpose. Award types include, but are not limited to, grants, cooperative agreements, and state and federal loans.
<b>Assistance Listing Formally known as CFDA Number</b>	Catalog of Federal Domestic Assistance Number. Assistance Listing numbers are the system for identifying and sorting the 2,000+ federal programs. Each Assistance Listing number contains five digits and appears in the following format: ##.### (e.g., 10.001 or 98.102).
<b>Cooperative Agreement</b>	Cooperative agreement means a legal instrument of financial assistance between a <a href="#">federal awarding agency</a> or <a href="#">pass-through entity</a> and a <a href="#">non-federal entity</a> that: <p>(a) Is used to enter into a relationship the principal purpose of which is to transfer anything of value from the <a href="#">federal awarding agency</a> or <a href="#">pass-through entity</a> to the <a href="#">non-federal entity</a> to carry out a public purpose authorized by a law of the United States (see <a href="#">31 U.S.C. 6101(3)</a>); and not to acquire <a href="#">property</a> or services for the Federal Government or <a href="#">pass-through entity</a>'s direct benefit or use;</p> <p>(b) Is distinguished from a grant in that it provides for substantial involvement between the <a href="#">federal awarding agency</a> or <a href="#">pass-through entity</a> and the <a href="#">non-federal entity</a> in carrying out the activity contemplated by the federal award.</p>
<b>Direct Federal Award</b>	Federal financial assistance received directly by the County, without passing through another agency (such as the State).
<b>Grant</b>	An award of financial assistance given to a recipient to carry out work for a public purpose or public good authorized by law that includes certain requirements. The County receives grants from many different entities, including (but not limited to) federal, state and non-profit entities. The County also awards grants to outside entities such as non-profits, and other governmental entities to carry out County programs.
<b>Indirect Costs</b>	<i>Indirect costs</i> are those costs incurred for a common or joint purpose benefitting more than one cost objective, and not readily assignable to the cost objectives specifically benefitted, without effort disproportionate to the results achieved. County Offices/Departments should work with the Auditor's Office, Financial Services Division to establish indirect cost rates.
<b>Grant Review Team</b>	The Grant Review Team reviews requests for grant application approval. The team is the Assistant County Manager, Financial Services Manager, Grants Manager, Senior Management Analyst, Internal Auditor, and HR Specialist.
<b>Matching Funds</b>	Cost sharing or matching means the portion of project costs not paid by federal funds (unless otherwise authorized by statute).
<b>New Award</b>	Initial financial assistance that provides support or stimulation to accomplish a public purpose. Awards include grants and other agreements in the form of money or property in lieu of money to an eligible recipient.
<b>Other Financial Assistance</b>	Other financial assistance typically includes cost reimbursement contracts, cooperative agreements, direct legislative appropriations, loans and loan guaranty programs, non-cash assistance, interest rate subsidies, and insurance agreements.



<b>Pass-Through Award</b>	Federal financial assistance received by the County via another agency (such as the state), or subawarded to another entity by the County. Pass-through funding is subject to the same federal funding guidelines and requirements as if received directly, as well as any additional requirements implemented by the pass-through entity.
<b>Pass-through Entity</b>	A pass-through entity is a recipient government, such as Thurston County, who transfers grant funds or other financial assistance to or spends on behalf of a secondary sub-recipient. All pass-through grant funds must be reported on the pass-through entity's financial statements. The pass-through entity may have both administrative involvement (determining eligibility and monitoring compliance) and in some remote cases, direct financial involvement (providing matching funds and incurring liability for disallowed costs).
<b>Program Income</b>	Income earned by the county or subrecipient that is directly generated by a supported activity or earned as a result of the federal award during the period of performance. (See <a href="#">§200.307</a> for complete federal definition of program income.)
<b>Recurring Grant</b>	A recurring grant is an ongoing grant that is part of a department's base budget. Recurring grants are exempt from the pre-approval process unless they are providing additional capacity from a previous grant period that will require additional FTE's and/or other resources.
<b>Renewal/ Continuation Application</b>	Request for additional funding of a currently awarded project in a subsequent funding period. Renewal/continuation applications may or may not compete with other applicants for award funding.
<b>Revision Application</b>	Request for additional funding of a currently awarded project to support new or additional activities not identified in the current award. Revision applications may or may not compete with other applicants for award funding.
<b>Subaward</b>	<i>Subaward</i> means an award provided by a <a href="#">pass-through entity</a> to a <a href="#">subrecipient</a> for the <a href="#">subrecipient</a> to carry out part of a federal award received by the <a href="#">pass-through entity</a> . It does not include payments to a <a href="#">contractor</a> or payments to an individual that is a beneficiary of a <a href="#">federal program</a> . A <a href="#">subaward</a> may be provided through any form of legal agreement, including an agreement that the <a href="#">pass-through entity</a> considers a <a href="#">contract</a> .
<b>Subrecipient</b>	<a href="#">Subrecipient</a> means a non-Federal entity that receives a subaward from a pass-through entity to carry out part of a Federal program; but does not include an individual that is a beneficiary of such program. A <a href="#">subrecipient</a> may also be a recipient of other Federal awards directly from a Federal awarding agency.
<b>Vendor</b>	A vendor is a dealer, distributor, merchant, or other seller providing goods or services that are necessary for conducting a grant activity. These goods and services may be for the direct use of Thurston County or for the use of subrecipients and other organizations benefiting from the grant.
<b>RELEVANT LAWS AND OTHER SUPPORTING INFORMATION</b>	
<b>County Code State Law State Rule Other Sources</b>	<a href="#">Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards</a> ("2 CFR 200", "Uniform Guidance" or "Super Circular")
<b>Superseded Documents</b>	<a href="#">POL-7510: Federal Assistance – Subrecipients and Vendors</a> <a href="#">POL-7520: Grants and Other Assistance</a>

Supporting Documents	<a href="#">OMB FAQs Regarding 2 CFR §200 – July 2017</a>	
Related Policies, Standards, Procedures	<a href="#">Thurston County Procurement - Policy 201</a> <a href="#">Capitalization of Fixed Assets – Policy and Procedure 6210</a> <a href="#">Small Assets – Policy and Procedure 6300</a> <a href="#">Collection of Accounts Receivable – Policy and Procedure 3050</a>  <b><u>Grants Management Procedures</u></b> 101-1 Award Administration 101-2 Subrecipient Management 101-3 Accounting for Grants  <b><u>Supporting Forms and Documentation</u></b> Grant Application Approval Request Grant Closeout Checklist	
Communication and Implementation Strategy	Policy changes and implementation will be communicated to affected County personnel via email and on SharePoint.	
POLICY ADMINISTRATION		
Contact Person	Grants Manager, Auditor   Financial Services	
Roles and Responsibilities	Office/Department	<ul style="list-style-type: none"><li>Performs day to day compliance activities pertaining to grants that they receive and administer.</li></ul>
	Elected Official / Department Director	<ul style="list-style-type: none"><li>Ensures Office/Department compliance with grant-related policies and procedures.</li></ul>
	Grants Manager	<ul style="list-style-type: none"><li>Performs organizational oversight of the County-wide grants management program.</li></ul>
	Auditor’s Office, Financial Services	<ul style="list-style-type: none"><li>Assist offices and departments, as necessary, with financial accounting activities of individual grants.</li></ul>
	Board of County Commissioners	<ul style="list-style-type: none"><li>Approves County’s strategic priorities and grant-related policies in support of the County’s mission.</li></ul>
REVISION HISTORY		
Effective Date	Approved By	Modifications
03/01/2006	<div>Name/Title</div>	POL-7520: Grants & Other Financial Assistance Policy Created
01/01/2008	<div>Name/Title</div>	POL-7510 Federal Assistance – Subrecipients & Vendors Policy Revised
10/01/2009	<div>Name/Title</div>	POL-7520: Grants & Other Financial Assistance Policy Revised



09/10/2019		POL-7510 Federal Assistance – Subrecipients & Vendors Policy
	Name/Title	Revised & Renamed Policy 101 – Grants Management
Reviewers of the Current Revision	Policy Committee Name/Title	Robin Campbell, Assistant County Manager Name/Title
	Darren Bennett, Fin Serv Manager Name/Title	Stacy Wyman, Grants Manager Name/Title
	Name/Title	Name/Title
<b>FURTHER INFORMATION</b> This section is not published on the final PDF document. It is for website purposes only		
Keywords for search engine	2 CFR 200, application, assistance agreement, award, federal, contractor, financial assistance, grant, pass-through, subrecipient, Uniform Guidance	

RESOLUTION NO. 16153

A **RESOLUTION** adopting the Grants Management policy.

**WHEREAS**, by motion on April 13, 2021 the Board of County Commissioners recognized that Thurston County is committed to adopting a consistent, transparent, and standardized approach to the development, review, and repeal of policies, standards, procedures, and guidelines.; and

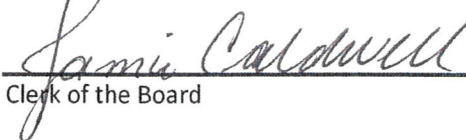
**WHEREAS**, the Board of County Commissioners recognizes that all County Offices and Departments shall participate in the uniform grants administration program prescribed in this policy to ensure that state, federal, and pass-through grants and other financial assistance: Further core County functions; Align with the County Strategic Plan and Budget; Provide for activities and assets that are in the best interest of the County; Are administered uniformly throughout the County in accordance with best management practices and the requirements of State and Federal law. ; and

**WHEREAS**, the Board of County Commissioners desires to provide clear policy direction regarding guidance on the accounting, management reporting and auditing of grants and other financial assistance with emphasis on awards from federal and state agencies.; and


**WHEREAS**, the Board of County Commissioners desires to assure consistent compliance with the laws and rules, Part 200 – Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards ("2 CFR 200", "Uniform Guidance" or "Super Circular").

**NOW, THEREFORE**, BE IT RESOLVED BY THE BOARD OF THURSTON COUNTY COMMISSIONERS that the Grants Management Policy as provided for in Exhibit A, attached hereto, is adopted effective April 26, 2022.

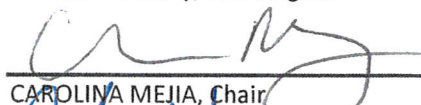
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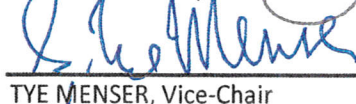
  
Clerk of the Board

APPROVED AS TO FORM:  
JON TUNHEIM  
PROSECUTING ATTORNEY

  
Deputy Prosecuting Attorney

BOARD OF COUNTY COMMISSIONERS  
Thurston County, Washington

  
CAROLINA MEJIA, Chair

  
TYE MENSER, Vice-Chair

 5-4-22  
GARY EDWARDS, Commissioner