

## Agenda Item 1.3.1

### BOARD OF COUNTY COMMISSIONERS BRIEFING PAPER

#### **Topic: Amendment to the Fiscal Review and Administration of Grants Policy**

**Presented by: Mary O'Neil, Grants & Procurement Director**

**Date: 7/22/2025**

☐ For Information

☐ For Discussion/Board Direction

☒ Consent to  
Place on Business/  
Hearing Agenda

**Issue:** Urgent policy amendment to the *Fiscal Review and Administration of Grants Policy*.

**Background:** In October of 2023, Jefferson County was awarded a Safe Streets for All (SS4A) Grant in the amount of \$545,000 to support the Jefferson County Safe Street and Roads for All Plan which focuses on preventing roadway fatalities and serious injuries. In June of 2025, the countywide Grants Management Team was notified that the Federal Highway Administration (FHWA)/Department of Transportation requires additional details in our policy before processing any reimbursement payments for this grant.

Specifically, FHWA requires language that outlines the urgency with which the County will spend the funds and process invoices and payments related to this grant. While a broader update of the *Fiscal Review and Administration of Grants* policy is currently underway, this particular revision cannot wait, as vendor invoices are expected to begin arriving soon. Expediting the approval of the minor updates to this policy will ensure no further delays in this important SS4A funded project.

**Discussion:** The recommended changes are shown in the attached red lined version of this policy. The substantive change required by FHWA reads as follows:

"In accordance with 2 CFR 200.305, it is the policy to minimize the time elapsed between the transfer of federal funds from the awarding agency and disbursement or expenditure of those funds. All departments and authorized personnel shall ensure that federal funds are requested and disbursed in a timely manner to avoid excessive cash on hand and to

reduce risk of misuse or loss. Funds will be drawn down only as needed for immediate expenditure to comply with the federal requirement to minimize the time between receipt and use of funds.”

In addition to the invoice/payment processing language, the updated policy also includes:

- A new section clarifying that the County will follow funder requirements for Federal or State grants not governed by 2 CFR 200, as this was previously not included in the policy under the Federal and State Grants section.

Note that the changes required by FHWA reference 2 CFR 200, the federal regulation which standardizes requirements for federal awards made to non-federal entities.

**Fiscal Impact:** ☐ yes ☒ no

Support for this policy update and placement on a future hearing agenda will ensure that reimbursement payments for this grant will be paid by the Federal Highway Administration. There is no change in revenue or expenditure budget or allocation.

**SPA Review:** Supports with no concerns. Sherry Wilger, 7/14/25.

**County Attorney Review:** Approved. Carey Markel, 7/10/25.

**Facilities Review:** Does not apply/no fiscal impact. Mark Danner, 7/14/25.

**BIT Review:** Does not apply/no fiscal impact. Rebecca Hascall, 7/14/25.

**Fleet Review:** Does not apply/no fiscal impact. Janice Mayer, 7/10/25.

**County Human Resources Review (new FTE only):** No FTE

**Recommendations:** Direct staff to bring the proposed policy amendments to a future hearing for consideration.

**Originator:**

Mary O’Neil, Director of Grants and Procurement, 303-271-8570

**Contacts for Additional Information:**

Daniel Conway, Chief Financial Officer, 303-271-8507

Andrea Niedziela, Federal Grants Manager, 303-271-8574  
Amanda Keil, Senior Grants Analyst, 303-271-8579  
Christopher Habgood, Senior Grants Analyst, 303-271-8571  
Kate Newman, Deputy County Manager, 303-271-8567