What to Expect for FY 2017

Overview of the grantee registration and pre-qualification for CAOs
Overview of Grantee Portal for Registration and Pre-qualification (30 ILCS 708/25 (6))

1. Organization name;
2. Federal Employee Identification Number;
3. Data Universal Numbering System (DUNS) number;
4. Fiscal condition;
5. Whether the applicant is in good standing with the Secretary of State;
6. Past Performance in administering grants (Past Audit Results, Fiscal and Administrative/Programmatic Risk)*

*Note: Must be completed by the agency and shared on the Central repository vault
A. Overview of Grantee Portal for Registration and Pre-qualification continued…

7. Whether the applicant is or has ever been on the **Debarred and Suspended List** maintained by GOMB;

8. Whether the applicant is or has ever been on the federal **Excluded Parties List**;

9. Whether the applicant is or ever has been on the **Sanctioned Party List** maintained by HFS; and

10. Federal Pass-through - Verification of SAM registration
A. Overview of Grantee Portal for Registration and Pre-qualification continued...

Information will be validated through Dunn and Bradstreet based on the information provided.

The Grantee will receive notification of:

- Non-Qualification (on State or Federal Debarred and Suspended list) - no remedy available
- Non-Qualification with Remediation
- Qualified to complete the Fiscal and Administrative Risk Assessment
B. Internal Control Questionnaire – Financial and Administrative Risk

- Uniform for all agencies
- Utilizes standard questions based on 2 CFR 200.205 and specific conditions in 2 CFR 200.207
- Will be relied-upon for all agencies
- For new grantees - automatic high risk - will be completed once award is made
Internal Control Questionnaire

The Pre-Qualification group has reviewed many sources of information to compile the Internal Control Questionnaire (ICQ) including:

**Federal awarding agency review of risk posed by applicants - 2 CFR 200.205 (c)**

- Financial stability
- Quality of management systems and ability to meet the management standards prescribed in 2 CFR 200
- History of performance
- Reports and findings from audits performed Subpart F - Audit Requirements of this part or the reports and findings of any other available audits
- The applicant’s ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities
Internal Controls - continued

2 CFR 200.62  Internal control over compliance requirements for Federal awards

*Internal control over compliance requirements for State and Federal pass-through awards* means a process implemented by an awardee entity designed to provide reasonable assurance regarding the achievement of the following objectives for State and Federal pass-through awards:
Internal Controls

(a) Transactions are properly recorded and accounted for, in order to:

- (1) Permit the preparation of reliable financial statements and State and Federal Pass-through reports (Both*)
- (2) Maintain accountability over assets (F&A*)
- (3) Demonstrate compliance with Federal statutes, regulations, and the terms and conditions of the Federal award (Both*)

*Note: items are marked Fiscal and Administrative (F&A), Programmatic or Both - which includes Fiscal and Administrative and Programmatic
(b) Transactions are executed in compliance with:

► (1) Federal statutes, regulations, and the terms and conditions of the Federal award that could have a direct and material effect on a Federal program

► (2) Any other Federal statutes and regulations that are identified in the Compliance Supplement; and

(c) Funds, property, and other assets are safeguarded against loss from unauthorized use or disposition.
Compliance Supplement -
Types of Compliance Requirements Crosswalk

Items are marked Fiscal and Administrative (F&A), Programmatic or Both - which includes Fiscal and Administrative and Programmatic

a. Activities Allowed or Unallowed - Programmatic

b. Allowable Costs/Cost Principles - For reasonable and necessary - Both (covered in Sections 5 and 6)

c. Cash Management - F&A (200.305)

d. Davis Bacon (under UG been moved to Special Tests and Provisions) - Programmatic - unique requirement of specific grant
Compliance Supplement - Types of Compliance
Requirements Crosswalk -- Continued

e. Eligibility - Programmatic (under Uniform Guidance (UG) moved to Special Tests and Provisions) - Programmatic - unique requirement of specific grant

f. Equipment and Real Property Management (Equipment Section 7, for Real Property) - Programmatic - unique requirement of specific grant

g. Matching, Level of Effort, Earmarking - Both

h. Period of Availability of Federal Funds - Both - for fiscal add questions about liquidation of obligation period
Compliance Supplement - Types of Compliance Requirements Crosswalk -- Continued

i. Program Income - Both - for fiscal, when applicable add questions regarding deducting program income from request for reimbursement or advance funding

j. Real Property Acquisition and Relocation (under UG been moved to Special Tests and Provisions) - Programmatic - unique requirement of specific grant

k. Reporting - Both; Fiscal Sections 3-4; programmatic includes performance reporting and unique requirements such as special reporting requirements

l. Subrecipient Monitoring - Both - fiscal Section 9)
m. Special Tests and Provisions - Programmatic - unique requirement of specific grant
C. Uniform Notice of Funding Opportunity

- Template for minimum general information requirements for compliance with 2 CFR 200, Appendix I
- Centralized link to the grant making agency
- Link to additional content specifying the terms of the funding opportunity
- Currently forms are not automated; agencies are responsible for integrating into their current processes and systems
D. Uniform Grant Application

- Template based on SF 424 inclusive of all required data fields for compliance with 2 CFR 200, Appendix I
- Link to Agency specific forms and documents based on the terms of the funding opportunity
- Currently forms are not automated; agencies are responsible for integrating into their current processes and systems
E. Merit Based Review Policy

- Uniform required criteria for all agencies: Need, Capacity, and Quality (allows for definitions and additional criteria based on grant and agency requirements)
- Evaluation based solely on criteria stated in grant application in accordance with 2 CFR 200.204
- Evaluation conducted by committee
- Appeal process for grantees (appeals only allowed on alleged process violations)
F. Programmatic Risk Assessment

- Uniform framework and template to evaluate programmatic risk of the applicant
- Utilizes standard questions based on 2 CFR 200.205 and specific conditions in 2 CFR 200.207
- Includes agency (grant) specific questions based upon the notice of funding opportunity and unique requirements of the individual grant
F. Programmatic Risk Assessment
Continued . . .

- Applicant responses will be evaluated for a programmatic risk determination
- Level of programmatic monitoring will be determined based on the assessment
- The grantee must be notified of the additional requirements in accordance with 2 CFR 200.207
G. Uniform Grant Agreement

- Template with all required state and federal clauses
- Exhibits are included for specific requirements and exceptions unique to the grant
- Currently forms are not automated; **agencies are responsible for integrating into their current processes and systems**
H. Uniform Budget and Reporting Template

- Standard summary line items
- Specific reporting detail / requirements may be set by the agency and are required to roll up to the summary budget
- Budget must comply with 2 CFR 200.308 - Revision of budget and program plans
- Financial Reporting (including Budget to Actual) will use the same template for quarterly reporting (risk assessment may require more frequent reporting requirements)
H. Uniform Budget and Reporting Template
Continued . . .

- Performance reporting based on the executed award will be required on a quarterly basis and must relate financial data to performance accomplishments in accordance with 2 CFR 200.301

- Annual Financial Report will be required with the Audit and must contain a “in relation to opinion” with the audited financial statements
I. Uniform IGA, additional boilerplate required when federal funds pay contractors

Templates with all required state and federal clauses

- Exhibits are included for specific requirements and exceptions

- Currently forms are not automated; agencies are responsible for integrating into their current processes and systems
J. Illinois Stop Payment List, State-wide Debarred and Suspended List

- State-wide policy will establish uniform terms for invoking stop payment status and uniform consequences for grantees on stop payment status
- Policy statements will be issued regarding enforcement of:
  - Illinois’ Stop Pay System
  - Illinois’ Debarred and Suspended List
K. Indirect Cost Rate Negotiation RFP vendor

Evaluation completed

- BAFO negotiations in process
- Contract to be issued in February
L. Initial Training Implementation

- First training areas
  - General Grant Management Overview
  - Cost Principles
  - Direct/Indirect Costs
  - Pre-Qualification
- February/March start training state staff
- Goal is to use Adobe Connect for implementation - currently in discussion with CMS
- May need to utilize other options - Please contact Trudy Ingalls if your agency has webinar capacity we could utilize in the interim
L. Initial Training Implementation continued

- Second training areas
  - Application Process
  - Budgeting and Reporting
  - Subrecipient Monitoring and Management
  - Performance Measures and Budgeting for Results
- Goal is to have training developed and begin implementation in FY16 4th Quarter
L. Initial Training Implementation continued…

- Third training areas
  - Procurement
  - Standards for Financial and Program Monitoring and Management
  - Using the Compliance Supplement
  - Key Components of an Effective Fraud Prevention and Detection Framework
  - Certification Program Training
- Goal is to develop and implement these trainings in FY17
Tech Solutions for FY2017

In order to assist Grantees and Agencies in meeting the requirements of GATA, a number of technology solutions are being planned and will be implemented in a phased manner. For FY2017, the following will be available.

1. **grants.Illinois.gov** - this will be the general website related to GATA. It will include a general overview of the purpose and requirements of GATA and links to all GATA-related sub-sites, including the Registration Portal, Catalog of State Financial Assistance (CSFA), and Notice of Funding Opportunity.

2. **Grantee Portal** - Using the same service provider as the Procurement Gateway, the Grantee Portal will provide the pre-registration and clearance process to ensure interested entities meet all requirements necessary to apply for a grant from the State of Illinois. The Portal will interface with Dun and Bradstreet and the State Debarred and Suspended List in addition to requiring other necessary screening information.

3. **Risk Assessment** - TeamMate, routinely used by the State of Illinois, has been identified as the most effective readily available tool to identify, record and track risk factors and compliance related to specific grantees. TeamMate will be made available to agencies through master contract for this purpose.
What to Expect for FY 2017

Next Steps

- Prepare your agency’s GATA Communication Plan; utilize narrative from the GATA Annual Report
- Provide staff lists to GATU
- Keep your agency engaged in GATA implementation
- Other ideas ???
What to Expect for FY 2017

QUESTIONS?