

Illinois Criminal Justice Information Authority

October 18, 2017

Agenda

- I. ICJIA Payment Policy
- II. Procedures for the Quarter Ended 9/30/17
- III. Changes to Financial Reporting Going Forward
- IV. Questions Received from Grantees

ICJIA Payment Policy

ICJIA Payment Policy

- Effective October 1, 2017, ICJIA will use a reimbursement-only system for paying its grantees.
- Payments will be made based only on financial reports documenting actual expenditures.
- Grantees will be required to submit either monthly or quarterly financial reports.
- This policy applies to both state and federal grants.
 - Section 3.1 of the 2015 DOJ Grants Financial Guide
 - Illinois Grant Accountability and Transparency Act
- Exceptions:
 - JAG Grantees who have established a trust fund for grant funds.
 - Grantees who receive ICJIA approval for an advance payment (of ≤ 10 days) to enable a large equipment purchase.

Procedures for the Quarter Ended 9/30/17

Procedures for the Quarter Ended 9/30/17

- Grantees will not be required to resubmit their financial report to ICJIA for the current reporting period.
 - ICJIA will edit the financial report and remove any projected expenses.
 - ICJIA will reimburse the grantees for grant award expenses that occurred during the current reporting period only.

- In the event that a grantee has previously received a cash advance that exceeds the expenses to-date on the financial report:
 - If the cash on hand is an amount that is expected to be spent within a 10-day period, the grantee may retain the funds and the amount will be deducted from the next reimbursement.
 - If the cash on hand exceeds an amount that is expected to be spent within a 10-day period, the grant monitor will contact the grantee about next steps.

Changes to Financial Reporting Going Forward

Changes to Financial Reporting Going Forward

- ICJIA will be issuing a revised form for financial reporting that will also be used to present the amount the grantee is requesting for reimbursement.
- The revised form will have a monthly or quarterly reporting format and will be used to detail:
 - Grant award expenditures.
 - Matching fund expenditures.
 - Remaining balances.
- The next slide is a draft of the revised financial reporting form. Grant monitors will send grantees the final version will be sent to grantees by November 1st.

PERIODIC FINANCIAL REPORT (PFR) Months 1 - 12 (Monthly Version)							Note: Grantee please complete the cells in BLUE only														
State Agency/(Grantor): Illinois Criminal Justice Information Authority																					
Grantee:				Reporting Period:					Agreement #:			Program Period:			FEIN#:						
Reimbursement \$:				ICJIA Grant Monitor		Approve Reimbursement? Circle One		Yes / No		ICJIA Grant Monitor Approval Signature/Date				ICJIA Grant Manager Approval Signature/Date							
State Appropriation Code - for state grants only																		Year to Date Values		Remaining Balances	
Line Item Expenses	Approved Grant Budget	Approved Match Budget	Month 1	Match Month 1	Month 2	Match Month 2	Month 3	Match Month 3	Month 4	Match Month 4	Month 5	Match Month 5	Month 6	Match Month 6	Total Grant Budget Expenditures Months 1-6	Total Match Months 1-6	Grant Funds Available	Match Budget Available			
Personnel	\$100,000	\$30,000	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$10,000	\$1,000	\$10,000	\$1,000	\$40,000	\$4,000	\$60,000	\$26,000			
Fringe	\$10,000	\$10,000	\$300	\$100	\$300	\$100	\$300	\$100	\$300	\$100	\$600	\$200	\$600	\$200	\$2,400	\$800	\$7,600	\$9,200			
Personne & Fringe Totals	\$110,000	\$40,000	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$10,600	\$1,200	\$10,600	\$1,200	\$42,400	\$4,800	\$67,600	\$35,200			
Equipment	\$10,000	\$5,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$12,000	\$6,000	-\$2,000	-\$1,000			
Supplies	\$10,000	\$5,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$6,000	\$6,000	\$4,000	-\$1,000			
Travel	\$10,000	\$5,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$6,000	\$10,000	-\$1,000			
Contractual	\$50,000	\$5,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$6,000	\$6,000	\$44,000	-\$1,000			
Other Cost	\$10,000	\$5,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$3,000	\$6,000	\$7,000	-\$1,000			
Total Expenses for the Period		\$65,000	\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$15,100	\$6,200	\$15,100	\$6,200	\$69,400	\$34,800	\$130,600	\$30,200			
Total Expenditures To-Date			\$9,800	\$5,600	\$19,600	\$11,200	\$29,400	\$16,800	\$39,200	\$22,400	\$54,300	\$28,600	\$69,400	\$34,800	\$69,400	\$34,800	-\$69,400	-\$34,800			
Budget Balance	\$200,000	\$65,000	\$190,200	\$59,400	\$180,400	\$53,800	\$170,600	\$48,200	\$160,800	\$42,600	\$145,700	\$36,400	\$76,300	\$1,600							
															Year to Date Values		Remaining Balances				
Line Item Expenses	Approved Grant Budget	Approved Match Budget	Month 7	Match Month 7	Month 8	Match Month 8	Month 9	Match Month 9	Month 10	Match Month 10	Month 11	Match Month 11	Month 12	Match Month 12	Total Expenditures Months 7-12	Total Match Months 7-	Grant Funds Available	Match Budget Available			
Personnel	\$100,000	\$30,000	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$5,000	\$500	\$30,000	\$3,000	\$30,000	\$23,000			
Fringe	\$10,000	\$10,000	\$300	\$100	\$300	\$100	\$300	\$100	\$300	\$100	\$300	\$100	\$300	\$100	\$1,800	\$600	\$5,800	\$8,600			
Personne & Fringe Totals	\$110,000	\$40,000	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$5,300	\$600	\$31,800	\$3,600	\$35,800	\$31,600			
Equipment	\$10,000	\$5,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$2,000	\$1,000	\$12,000	\$6,000	-\$14,000	-\$7,000			
Supplies	\$10,000	\$5,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$6,000	\$6,000	-\$2,000	-\$7,000			
Travel	\$10,000	\$5,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$1,000	\$0	\$6,000	\$10,000	-\$7,000			
Contractual	\$50,000	\$5,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$1,000	\$6,000	\$6,000	\$38,000	-\$7,000			
Other Cost	\$10,000	\$5,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$500	\$1,000	\$3,000	\$6,000	\$4,000	-\$7,000			
Total Expenses for the Period	\$200,000		\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$9,800	\$5,600	\$58,800	\$33,600	\$71,800	-\$3,400			
Total Expenditures To-Date			\$79,200	\$40,400	\$89,000	\$46,000	\$98,800	\$51,600	\$108,600	\$57,200	\$118,400	\$62,800	\$128,200	\$68,400	\$128,200	\$68,400	-\$197,600	-\$68,400			
Budget Balance	\$130,600	\$30,200	\$120,800	\$24,600	\$111,000	\$19,000	\$101,200	\$13,400	\$91,400	\$7,800	\$81,600	\$2,200	-\$46,600	-\$66,200							
GRANTEE CERTIFICATION (2CFR 200.415)																					
By signing [authorizing] this report, I certify to the best of my knowledge and belief that the report is true, complete, and accurate, and the [related] expenditures, disbursements and cash receipts are for the purposes and objectives set forth in the terms and conditions of the award. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (U.S. Code Title 18, Section 1001 and Title 31, Sections 3729-3730 and 3801-3812																					
Printed Name, Signature and Title of Authorized Preparer of the Report:										Telephone:				Email:			Date Submitted:				
Signature and Title of the Approver of the Report (must be different than Preparer)										Telephone:				Email:			Date Submitted:				

Questions Received from Grantees

Questions Received from Grantees

- Will this webinar be accessible at a later time?
 - Yes. This webinar will be posted to ICJIA's website no later than October 23rd so that grantees can refer back to it.

- If we have already submitted a quarterly grant report for the period ended 9/30/17 and included projections for the next quarter, will it be rejected?
 - No. ICJIA will make the necessary changes to any reports that are submitted for the period ended 9/30/17 that included estimated expenditures for the next reporting period. The grantee will receive any funds in reimbursement for that period necessary to eliminate a negative cash balance.

Questions Received from Grantees

- We are a JAG grantee who had an established trust fund account. Are we exempt from the reimbursement policy? Will we still be able to receive funds three months in advance?
 - Yes. JAG grantees who have established a trust fund account are an exception to the reimbursement-only policy. Those grantees will still be able to receive advance payments.

- For those grantees who will be subject to the reimbursement system, will we have the option to request monthly reimbursement from the Associate Director of Grants?
 - Not exactly. Grantees who have *not* previously requested a cash advance will categorically remain on a quarterly reimbursement cycle, at least for the time being. For grantees who have previously requested a cash advance, you will receive a “justification form” from your grant monitor that you will have to fill out and explain your situation and need for monthly reimbursements if you want to switch to a monthly reporting period. The Associate Director will review these forms when making his determination.

Questions Received from Grantees

- What is the anticipated turn around time for reimbursements? Within how many business days from submitting the financial report can we expect payment?
 - Within 30 days of receiving a complete and accurate financial report, ICJIA will complete its review and submit the necessary paperwork to the State Comptroller for payment. The exact timing of payment from the Comptroller may vary depending on the source of funds.

- Why is ICJIA using the DOJ specific guidance for advance payments rather than the standard Federal Uniform Guidance, which does not contain a ten-day restriction?
 - ICJIA follows both the Federal Uniform Guidance and the DOJ Grants Financial Guide. The DOJ Grants Financial Guide is not contrary to the Uniform Guidance, but rather is the DOJ's clarification and elaboration on the Uniform Guidance.

Questions Received from Grantees

- What specifically does GATA state in regard to state agency reimbursements or advance payments?
 - GATA is codified at 30 ILCS 708/5. It does not speak specifically to payment procedures, but rather, adopts the Federal Uniform Guidance, which says that “[a]dvance payments to a non-Federal entity must be limited to the minimum amounts needed and be timed to be in accordance with the actual, immediate cash requirements” of the grantee. 2 CFR §200.305 The 10-day rule is DOJ’s codification of “immediate.”
- For grants that involve only state funding, why are DOJ rules regarding payments being adapted?
 - DOJ rules are not directly being applied to state funds. Rather, state funds must be administered in compliance with GATA and the Federal Uniform Guidance, including the language quoted above. Although the Federal Uniform Guidance does not specify what qualifies as “immediate,” the DOJ’s 10-day interpretation must inform how ICJIA interprets “immediate” more generally, and therefore determines how ICJIA applies that regulation to state funds.

Questions Received from Grantees

- What is the purpose of adopting the DOJ's 10-day rule for grants that do not involve DOJ funds?
 - See above. The purpose is to avoid violating state and federal law.
- We have a fully executed agreement allowing for advance payments. How will this be affected?
 - The language in existing grant agreements allows for the possibility of advance payments, but does not require advance payments. Given that any advance payment that exceeds 10 days would violate state and federal law, ICJIA will no longer utilize that option under existing grants.
- Is there a waiver that grantees can accept instead of the GATA?
 - This question is not clear, but no, ICJIA is not able to grant a waiver to these federal and state laws.

Questions Received from Grantees

- Do all Federal Agencies require the same certification language?
 - No.

- Is VOCA funding administered through DOJ?
 - Yes.

- If there is an amendment to current grant agreements, can a grantee make a certification to allow draw down advance payments to be made and disbursed in the required specific time period?
 - No. The State does not have a draw down system, therefore, ICJIA grantees are not able to make periodic, timely draw downs. Rather, grantees must submit financial reports, based upon which, ICJIA will request payment from the State Comptroller.