

Grant Accountability and Transparency Act

MONTHLY CAO UPDATE - OCTOBER 2015

Topics of Discussion

- GATA Roles and Responsibilities
- GATA Rule-making Efforts
- GATA Accomplishments
- FY 16 Strategic GATA Milestones
- GATA Next Steps

What time is it?



Successful Grantees = Illinois Success

GATA Roles and Responsibilities

Clarity of Roles = Enhanced Results

- GATA requires a coordinated effort between State grant-making agencies and the Grant Accountability and Transparency Unit (GATU)
- Overarching goals of GATA are to eliminate duplicative grant requirements and reduce administrative burdens while increasing accountability and transparency
- Working together, agencies, CAOs and the GATU can most effectively accomplish the goals of GATA

Roles and Responsibilities – Agencies

State Grant-making Agencies:

- Adopt by rule the language in 2 CFR 200, Subpart C through Subpart F
- Require recipients and subrecipients to relate financial data to performance accomplishments of the award
- Require recipients and subrecipients to provide cost information to demonstrate cost-effective practices
- Provide recipients and subrecipients with clear performance goals, indicators and milestones, establish performance reporting frequency and content

Roles and Responsibilities – CAOs

- Serve as a liaison to the GATU
- Responsible for the agency's implementation of and compliance with the rules
 - Communication and training of Agency Staff (with GATU support)
 - Communication and training of grantees funded through the agency (with GATU support)
 - Provide agency information requested on a timely basis

Roles and Responsibilities – GATU

- Provide advice and technical assistance to State grant-making agencies to ensure compliance with GATA
- Provide direction, leadership and coordination of activities to produce the deliverables required to implement GATA.

GATA Rule-making Efforts

GATA Leveraged the Federal Model

- General Rules modeled after Federal Uniform Guidance
- Through the Rulemaking phase, it was agreed that the Federal Uniform Guidance (UG) 2 CFR 200 would be followed with relatively little or no changes
 - ✓ An exception is required to deviate from the UG
 - ✓ An exception request form must be completed and approved by GATU
- **All Federal exceptions are automatically approved**
 - ✓ This includes federal and federal pass-through programs
 - ✓ Also includes state statutes that impact federal programs

State Agencies Must Adopt Agency-specific Rules

- GATU provided a list of Federal Agency Exceptions for agencies to review
- Agencies must:
 - Identify administered Federal programs impacted by Federal Agency Exceptions
 - Consider Federal Agency Exceptions in agency-specific rule making
 - Review state statutes for Federal funded programs to identify where more stringent rules have been enacted in Illinois Compiled Statutes and/or Illinois Administrative Code
 - Submit the completed rule exception form for GATU approval when state or federal programs include more stringent requirements
- If your agency has programmatic rules that are impacted by the UG, the programmatic rules may need to be updated

Timing of Agency Rule Making

- GATU is working with JCAR to fast track State rule making in 6 months – State rules will mirror the passed Federal rules
- Agencies should not wait for the final “general rules” to be completed to start agency-specific rule making efforts
- Goal is to have majority of agency rules completed by July 2016

GATA Accomplishments

Illinois Adopted Federal Rules for State Grants

- Adoption of Federal and Federal Pass-through Administrative Rules published August 7, 2015 in Illinois Register
- Federal Rules allowing flexibility reviewed for additional state requirements
- Federal, Federal Pass-through and State grant review led to:
 - ✓ 9 amendments/changes
 - ✓ Less than 15 formally posted comments and questions

Implementation Phase Deliverables

- Published Grantee Indirect Cost Negotiation RFP, IPB reference 22037194
- Developing framework for a cross-agency Stop Payment Notification processes
- Developing grant life-cycle management tools including:
 - ✓ Grantee pre-qualification process and automated tools
 - ✓ Uniform grant application and grant agreement
 - ✓ Framework for programmatic, financial and administrative risk assessments
 - ✓ Merit-based grant application review policy and process

GATA Accomplishments - Continued

Additional staff for GATU and agency / grantee volunteers

- 2 staff additions (3 total)
- Over 200 people serve on ILSAC / GATA Subcommittees ... are your agency's grantees engaged?

Communication plan in motion

- Website dedicated to GATA
- Released GATA newsletter to promote
- 4 Town Hall Meetings and 2 webinars with over 500 attendees

FY 16 Strategic GATA Milestones

Key Milestones

- Catalog of State Financial Assistance (CSFA)
- Indirect Cost Rate Negotiations
- Pre-Qualification / Grantee Registration Portal
- Uniform Grant Application
- Uniform Grant Agreement and IGAs
- Finalize round one of Performance Matrix
- Finalize rules for the use of Fiscal Agents
- Finalize rules – General Federal, Federal Pass-through, and State
- Develop agency-specific rules

Key Milestones - Continued

- Finalize definition of a grant
- Implement Debarred and Suspended List
- Implement Stop Payment
- Implement the GATA Revolving Fund
- Amend the Statewide Indirect Cost Allocation Plan
- Training Plan implementation
- Implement the Learning Management System
- Finalize technical process flows for GATA
- Finalize technology implementation plan in conjunction with ERP efforts

GATA Next Steps

GATA Next Steps – FY 16 Budget

- GATA has not been funded, currently have 3 staff and volunteers
- Additional staff are needed for BFR and GATA
- Implementation efforts require more front-end resources, longer term staffing needs will be reassessed
- Staff development and training for GATU
- GATA revolving fund
 - ✓ The majority of the costs are allowed to be charged as administrative costs to the grants
 - ✓ Allocate through the Statewide Cost Allocation Plan (SWICAP)
 - ✓ Identified seed funding

Overarching Next Steps

➤ **Technology**

- ✓ Work directly with ERP implementation team to identify functionality gap in order to finalize GATA Technology Plan
- ✓ Continue work with CPO and Procurement Gateway to implement grantee pre-qualification portal
- ✓ Finalize GATA Technology System Plan with timelines and implementation plan

➤ **Release public version of CSFA** – Inclusive of all Federal and State funding

➤ **Training** - Key to success of GATA for state agency staff and grantees, annual training requirements and grant training certifications

➤ **Communication plan** - Outreach to stakeholders, periodic updates, consensus building and change management

Catalog of State Financial Assistance - CSFA

- GATA mandates the establishment of a database for state, federal and federal pass-through funds available within the State of Illinois
- CSFA was designed as a comprehensive database of all state, federal and federal pass-through grants modeled after the Catalog of Federal Domestic Assistance
- Agency input is required to build the CSFA because there is no apparent source for state and federal pass-through data
- In response to agency feedback, GATU is reassessing the scope of data that must be provided for the initial CSFA release
 - ✓ Agency requirements will be communicated before the end of October
 - ✓ Projected due date for CSFA entries will be 11/20

Performance Measurements

- Collect baseline compliance data on grant awards
- Finalize performance measures that assess effectiveness of GATA
- Submit Annual Report to Governor and General Assembly
 - ✓ Demonstrate efficiencies, cost savings, and reductions in fraud, waste, and abuse as a result of the adoption and implementation of this GATA.
 - ✓ Include information on:
 - The number of entities placed on the Debarred and Suspended List
 - Reduction of duplicative audits
 - Number of persons trained to assist grant recipients and subrecipients
 - Number of recipients and subrecipients to whom a fiscal agent was assigned

GATA is Good Government

It is GATA time!



Landmark legislation

Sets the bar for grant accountability

Sets the bar for grant transparency

Win-win for government and grantee
community

Improves performance outcomes

Reduces risk of fraud, waste, and abuse

Saves the State agencies and grantees
hundreds of millions of dollars.

GATA Questions?

