

Grant Pre- and Post-award Phases – Roles and Responsibilities
GATA 2018 Spring Training – FY19

Area	GATU/Workgroups	State Awarding Agency	State Cognizant Agency	Grantee
<p><i>Authentication</i></p> <p><i>(Completed <u>once</u> for each <u>individual</u> associated with a registration)</i></p>	<ol style="list-style-type: none"> 1) Provide access to the statewide authentication system so entities can create an Illinois Public Account, as required 2) Limit Grantee Portal access to individuals who have completed authentication 	<ol style="list-style-type: none"> 1) Encourage and support the entity authentication process 	<ol style="list-style-type: none"> 1) Support the entity as they complete authentication 	<ol style="list-style-type: none"> 1) Complete the authentication process as a pre-requisite to registration <p>(Required for each individual that will access the Grantee Portal)</p>
<p><i>Registration</i></p> <p><i>(Completed <u>once, annually</u> for the <u>entity</u>)</i></p>	<ol style="list-style-type: none"> 1) Create and maintain web based Grantee Portal for entity registration 2) Provide HELP links for self-directed grantee / entity use 3) Provide entity-level registration status to state agencies through the State Staff Inquiry Screen 	<ol style="list-style-type: none"> 1) Ensure entity has completed registration prior to accepting grant application 	<ol style="list-style-type: none"> 1) Support the entity as they complete registration 	<ol style="list-style-type: none"> 1) Complete registration from the Grantee Portal 2) Obtain required information, if necessary
<p><i>Pre-Qualification</i></p> <p><i>(Completed <u>once, annually</u> for the <u>entity</u>)</i></p>	<ol style="list-style-type: none"> 1) Create and maintain web based Grantee Portal to automate grantee pre-qualification checks and notifications: <ol style="list-style-type: none"> a. Qualified b. Not qualified but can remediate; HELP provides links for remediation c. Not qualified due to Federal Debarred and Suspended status – cannot remediate 	<ol style="list-style-type: none"> 1) Ensure entity has completed pre-qualification prior to accepting grant application 2) Utilize State Staff Inquiry Screens as necessary to look up and support entities attempting to pre-qualify 	<ol style="list-style-type: none"> 1) Support the entity as they complete pre-qualification 2) Support the entity if status changes and assistance is needed 	<ol style="list-style-type: none"> 1) Complete pre-qualification on the Grantee Portal 2) Promptly remediate issues when notified 3) Maintain qualified status – system notices alert when status changes

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	<ul style="list-style-type: none"> 2) Perform nightly pre-qualification checks to manage entity “qualified” status 3) Generate automated notices when status changes 			
<p><i>Fiscal and Administrative Risk Assessment (ICQ)</i></p> <p><i>(Completed <u>once, annually for the entity</u>)</i></p>	<ul style="list-style-type: none"> 1) Create centralized risk assessment framework (questionnaire and automation) to evaluate an entity’s financial and administrative internal controls 2) Develop grantee risk profile parameters 3) Provide ICQ training and instructions 	<ul style="list-style-type: none"> 1) Ensure the entity has an accepted ICQ prior to making an award (refer to the State Staff Inquiry System for ICQ acceptance) 	<ul style="list-style-type: none"> 1) Support the entity as they complete the ICQ 2) Perform timely review of ICQ responses 3) Work with the entity if ICQ responses appear to be incorrect 4) Accept the ICQ responses, when appropriate 5) Provide prior performance for fiscal and administrative risk factors to complete risk profile 	<ul style="list-style-type: none"> 1) Ensure the ICQ is completed by an individual with financial or accounting expertise 2) Complete the ICQ before a Notice of State Award (NOSA) can be made
<p><i>Fiscal and Administrative Specific Conditions</i></p> <p><i>(Including removing Specific Conditions)</i></p>	<ul style="list-style-type: none"> 1) Standardize specific conditions based on ICQ results 2) Automate corresponding specific conditions in response to ICQ results for awarding agencies 	<ul style="list-style-type: none"> 1) Include ICQ specific conditions to the NOSA 2) Monitor and enforce compliance with the specific conditions 	<ul style="list-style-type: none"> 1) Provide assessment of ICQ corrective action for specific conditions, issue management 	<ul style="list-style-type: none"> 1) Review ICQ specific conditions as stated in NOSA <ul style="list-style-type: none"> a. Accept ICQ specific conditions,

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	3) Create policies and procedures for removing specific conditions when corrective action is implemented		decision to grantee 2) Follow up and document review of the request for reconsideration of specific condition 3) Remove specific condition for effective implementation of corrective action	b. Obtain clarification from awarding agency, or c. Notify awarding agency that grant will not be accepted 2) Comply with ICQ specific conditions, if any are stated 3) Submit a corrective action plan for identified risk issues 4) Implement corrective action 5) Once time parameter requirement is met, contact Cognizant Agency for desk review and/or site visit to verify effective implementation of corrective action to remove specific condition
<i>Notice of Funding Opportunity (NOFO)</i>	1) Create uniform NOFO template with section-specific instructions 2) Provide instruction on NOFO use 3) Inform grantees that the NOFO will be the state’s vehicle for announcing all <u>competitive</u> grant funding opportunities 4) Provide and maintain a framework from the CSFA to generate all NOFOs for public	1) Generate the NOFO including the NOFO Supplemental from the CSFA for publication on www.grants.illinois.gov 2) Publication must comply with uniform and specific grant requirements. Competitive grants must be published at least 30 days prior to the due date.	No specific requirements	1) Refer to the NOFO for detail about grant funding opportunities 2) Link to the agency application from the NOFO

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	display on www.grants.illinois.gov			
<i>Grant Application Content</i>	<ol style="list-style-type: none"> 1) Create uniform grant application 2) Provide instruction on the application template 	<ol style="list-style-type: none"> 1) Prepare the application for each grant award opportunity 2) Identify all agency-specific content required as part of the solicitation 	No specific requirements	<ol style="list-style-type: none"> 1) Complete the application and all agency-specific requirements in accordance with the NOFO and/or the application instructions (non-competitive awards may not have an NOFO) 2) Submit the application and all agency-specific requirements following the awarding agency’s protocol
<i>Application Budget</i>	<ol style="list-style-type: none"> 1) Create standardized budget template with instructions 2) Provide instructions for using the standard budget template 	<ol style="list-style-type: none"> 1) Customize the standard budget template for the line items, data required for the award 2) Receive completed budgets as part of the application packet 3) Perform a <u>programmatic</u> review of submitted budget 4) Perform a <u>fiscal and administrative</u> review of submitted budget 5) Review grantee’s indirect cost rate or de minimis rate election to ensure it was applied properly (See 	No specific requirements	<ol style="list-style-type: none"> 1) Complete the budget, including all applicable sections, as part of the application packet 2) Understand basic considerations and selected items of cost (e.g., direct/indirect, allowability); refer to GATU training where necessary 3) Apply the de minimis, federally negotiated or state negotiated indirect cost rate correctly (See Negotiating Indirect Cost Rate Section)

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		Negotiating Indirect Cost Rate Section) 6) Approve budget or work with applicant to finalize budget 7) Identify, review and approve budget revisions		4) Certify the budget before submitting the application / budget packet
<i>Application Posting</i>	1) Maintain links to grant applications from NOFOs centralized at www.grants.illinois.gov 2) Notify agency of broken link	1) Maintain the application link to the NOFO throughout the posting duration 2) Receive completed applications 3) Respond to questions about posted applications	No specific requirements	No specific requirements
<i>Application Submission</i>	No specific requirements	1) Provide application support as specified in the NOFO 2) Record date and time of receipt of each application	No specific requirements	1) To obtain the application, link to the agency-maintained application from the NOFO 2) Complete the required information and submit the required form(s) per the agency's instructions

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<i>Merit based review</i>	<ol style="list-style-type: none"> 1) Create standardized Merit Based Review policy including appeal process 2) Create Confidentiality and Conflict of Interest Disclosure form for competitive grant evaluation 3) Provide instruction to State agencies on Merit Review Process 	<ol style="list-style-type: none"> 1) Ensure Merit Based Review process is followed for <u>competitive</u> grants 2) Ensure Conflict of Interest is disclosed and addressed 3) Ensure award determination is based on Merit Based Review, if award is competitive 4) Maintain file with award determination documentation 	No specific requirements	<ol style="list-style-type: none"> 1) Be aware of merit based review criteria per the NOFO 2) Comply with merit based review award determinations and specific conditions 3) Utilize the appeals processing, if appropriate
<i>Programmatic Risk</i> <i>(Completed for each grant)</i>	<ol style="list-style-type: none"> 1) Create programmatic risk assessment questionnaire to evaluate the applicant’s ability to execute a specific program 2) Develop a grantee programmatic risk profile parameters 3) Provide programmatic risk assessment instructions for agencies to prepare and disseminate the questionnaire and evaluate programmatic risk responses 	<ol style="list-style-type: none"> 1) Ensure the applicant has completed the programmatic risk assessment prior to making an award 2) Support the applicant completing the programmatic risk assessment questionnaire 3) Evaluate the degree of programmatic risk posed by the applicant 4) Agree to the specific conditions imposed from the programmatic risk assessment 	No specific requirements	<ol style="list-style-type: none"> 1) Complete the programmatic risk assessment before a NOSA can be made
<i>Programmatic Risk Specific Conditions</i>	<ol style="list-style-type: none"> 1) Standardize specific conditions based on programmatic assessment results 	<ol style="list-style-type: none"> 1) Evaluate grantee responses to open-ended questions 	No specific requirements	<ol style="list-style-type: none"> 1) Review programmatic specific conditions as stated in NOSA

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	2) Create policies and procedures for removing specific conditions when corrective action is implemented	on the programmatic risk assessment 2) Assign risk value to open-ended questions as applicable (final report will be based on cumulative programmatic risk profile) 3) Include programmatic risk assessment specific conditions to the NOSA 4) Monitor and enforce compliance with the specific conditions 5) Provide assessment of corrective action for specific conditions, issue management decision to grantee 6) Follow up and document review of the request for reconsideration of specific condition 7) Remove specific condition for effective implementation of corrective action		a. Accept specific conditions, b. Obtain clarification from awarding agency, or c. Notify awarding agency that grant will not be accepted 2) Comply with programmatic specific conditions, if any are stated 3) Submit a corrective action plan for identified risk issues 4) Implement corrective action 5) Once time parameter requirement is met, contact awarding agency for desk review and/or site visit to verify effective implementation of corrective action to remove specific condition
<i>Notice of State Award (NOSA)</i>	1) Create the uniform NOSA Template 2) Provide instructions to agencies on completing the NOSA	1) Complete the NOSA from the CSFA including documentation of all specific conditions (ICQ, programmatic risk	No specific requirements	1) From the Grantee Portal, access the NOSA 2) Review the NOSA to ensure understanding and acceptance of grant terms and specific conditions

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		assessment and merit based review) 2) Answer applicant questions re: grant terms stated in the NOSA 3) Obtain a grantee accepted NOSA before executing the agreement		3) Dialog with the awarding agency as necessary 4) Accept the NOSA via the Grantee Portal (grant will not be awarded if the NOSA is not accepted) or 5) Decline the NOSA via the Grantee Portal (grant will not be awarded if the NOSA is declined)
<i>Grant Agreement</i>	1) Create the uniform grant agreement template (UGA) 2) Provide state agency staff with instructions for completing the agreement	1) Complete the Agreement, including cross references and Exhibits, ensuring consistency with NOSA terms 2) Ensure Exhibit H – Specific Conditions includes all specific conditions previously determined applicable 3) Attach the final, approved budget 4) Execute the agreement with the grantee signature	No specific requirements	1) Sign and submit the agreement to the awarding agency 2) Retain a copy of the executed agreement for grantee files 3) Comply with the terms of the executed agreement
<i>Indirect Cost Rate Election</i>	1) Provide a centralized system for grantees to make an indirect cost rate election 2) Provide a centralized framework through a procured vendor for grantees to negotiate indirect cost rates	1) Identify a ICRN Subject Matter Expert (SME) to serve as the liaison between grantees and the procured vendor 2) SMEs become the agency’s go-to experts on the indirect cost rate	1) Assist grantee in completing timely submissions through the centralized indirect cost rate system	1) Organizations that <u>have not previously received an Indirect Cost Rate:</u> To claim Indirect cost reimbursement, grantee must <u>utilize the indirect cost rate system</u> to do one of the following:

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	3) Assist <u>Cognizant State Agency</u> Subject Matter Experts using the centralized framework; SMEs are the front-line of support to grantees 4) Direct the procured vendor in providing responsive training to awarding agencies and grantees 5) Maintain official records of all grantee elections and indirect cost rates 6) Assist with exceptions, provisions, limits, restrictions 7) Facilitate appeal hearings regarding indirect cost rate negotiation	framework and system; engage in training and best practice sharing 3) Ensure indirect costs are charged appropriately on each billing a. Ensure indirect costs are classified correctly b. Ensure de minimis rate or negotiated rate is applied correctly c. Ensure indirect costs are <u>not</u> charged if the grantee does not make an election in the indirect cost rate system or elects not to charge indirect costs 4) Maintain, develop and provide program-level exceptions, provisions, limits and restrictions regarding to indirect cost a. Record in CSFA b. Include in NOSA and the grant agreement	2) Assist grantees with timely follow-up requests from procured contractor regarding indirect cost rate proposals 3) Timely accepted of an indirect cost rate election (de minimis rate, federally negotiated indirect cost rate (NICRA), election of no rate) or a negotiated state rate within the centralized indirect cost rate system 4) Engage in appeal notices or hearings re: indirect cost rate negotiation, as applicable	a. Submit their federal rate agreement (NICRA and <u>use immediately</u> , b. Submit Indirect Cost Rate Proposal (ICRP) <u>within 90 days of grant award</u> . Grantee can claim indirect cost reimbursement under the negotiated rate once approved. c. <u>If eligible</u> , elect the 10% de minimis rate and <u>use immediately</u> . De minimis rate may be used indefinitely or until an indirect cost rate is <u>negotiated</u> . d. Use “special rate” designated by federal statute <u>immediately</u> . e. OR elect to claim NO indirect cost reimbursement 2) Organizations that <u>have previously received an Indirect Cost Rate through the Centralized Indirect Cost Rate System</u> : To claim indirect costs after year 1, grantee must utilize the indirect cost rate

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				<p>system to do one of the following:</p> <ul style="list-style-type: none"> a. Submit a copy of the federal rate agreement b. Submit an Indirect Cost Rate Proposal (ICRP) to the Vendor <u>within 6 months of the close of the grantee’s fiscal year</u>. (Continue to use initial or current rate until new rate is negotiated.) c. Certify and continue to use of the 10% de minimis rate d. Continue to use rate designated by program rules e. OR elect to claim NO indirect reimbursement <p>Each grantee must record their indirect cost rate election or negotiation in the indirect cost rate system <u>annually</u>. Elections not documented in the system cannot be reimbursed.</p>

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				3) Attend training on indirect cost rates and negotiation processes 4) Certify type of indirect cost rate on budget template
<i>Establishing Exceptions to GATA / Uniform Guidance Requirements</i>	1) Inform agencies that statutory requirements govern exceptions to federal Uniform Guidance requirements and GATA 2) Instruct agencies to research agency and program statutory requirements and submit requests for exception(s) 3) Provide technical assistance to agency personnel documenting exceptions 4) Submit completed requests for exceptions to the Governor’s Compliance Office as necessary 5) Notify agencies in writing of Compliance Office response to exception(s) requests 6) Maintain official records of authorized exceptions	1) Research applicable statutes and regulations to determine where federal Uniform Guidance exceptions have been authorized 2) Submit to GATU the statutory reference governing an exception 3) If a statutory reference cannot be obtained, contact an authoritative <u>financial</u> source from the Federal awarding agency and obtain written approval for a specified exception 4) Submit completed exception request to GATU along with the applicable citation and/or the written authorization from the Federal awarding agency 5) Receive written response to the exception request from GATU	No specific requirements	No specific requirements

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		6) Apply the exception to the applicable program 7) Upon written approval, include exception(s) in the CSFA, NOFO (if applicable), NOSA and grant agreement		
<i>Centralized Audit Report Review</i>	1) Design, implement and maintain the Audit Report Review Management system (ARRM) 2) Provide Grantee Portal notifications regarding audit requirements, due dates, submission requirements and reminders. 3) Provide State agency notifications regarding grantee submissions and FAC submissions (cog agency) 4) Monitor awarding agencies' system responses to corrective action 5) Administration of CART process 6) Administration of Audit Committee 7) Document results in ARRM 8) Provide technical assistance throughout the audit report review process as necessary	1) Assign audit report review liaison – single point of contact responsible for the audit report review process 2) Assign at least one audit report review SME for fiscal and administrative findings 3) Assign at least one audit report review SME for programmatic findings 4) Ensure that grantee audits are completed and reports are received in a timely manner in accordance with GATA (primary responsibility is with the Cognizant Agency, but all awarding agencies are responsible to ensure grantee compliance) 5) Reconcile CYEFR expenditures to State agency records 6) Approval of corrective action plans for findings directly related to their	1) Ensure that audits are completed and reports are received in a timely manner in accordance with GATA (primary responsibility is with the Cognizant Agency, but all awarding agencies are responsible to ensure grantee compliance) 2) Upload grantee Single Audit packets to ARRMS from FAC 3) Initiate stop pay for grantees who have not submitted an audit report	1) Procure audit services in accordance with 2 CFR 200.509 2) Prepare financial statements 3) Complete the Audit Certification within 60 days of their Fiscal Year End 4) Complete the CYEFR 5) Have the proper audit conducted 6) Upload the complete audit packet based on audit type 7) Complete the State Data Collection Form 8) Participate in CART 9) Request technical assistance and the CART process when necessary 10) Timely implementation of all corrective action plans

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	<p>Contractor Responsibilities</p> <ol style="list-style-type: none"> 1) Review audit report packet submission for completeness 2) Identify missing items 3) Review audit report for compliance with applicable auditing standards 4) Review CYEFR “In Relation To” opinion 5) Ensure CYEFR in audit matches CYEFR submitted in Grantee Portal 6) Provide details for financial statement findings 7) Issue Pass, Pass with Deficiencies or Fail determination on audit reports 8) Perform workpaper quality control reviews as directed by the Audit Committee 	<ol style="list-style-type: none"> 4) grants and cross-cutting findings 7) Request CART assistance for repeat findings on subawards 8) Participate in CART for approval of corrective actions plans for cross-cutting and/or complex findings 9) Follow-up on audit findings to ensure grantee takes timely and appropriate corrective action 10) Collection of questioned costs 11) Provide technical assistance to auditees in programmatic areas as requested 12) Request technical assistance from GATU for fiscal and administrative requirements 	<ol style="list-style-type: none"> 4) Review overall CYEFR reconciliation and identify if Audit Committee assistance is necessary 5) Review overall CAP acceptance and identify if CART is required 6) Issuance of the Management Decision Letter 	
<i>Periodic Grant Reporting</i>	<ol style="list-style-type: none"> 1) Design reporting templates and instructions for periodic financial reporting (PFR) and periodic performance report (PPR) 2) Implement templates statewide for use by all grantmaking agencies 	<ol style="list-style-type: none"> 1) Implement templates into agency protocols for utilization within grant agreements 2) Ensure applicable program and fiscal staff receive templates, instructions and technical assistance, as needed 	No specific requirements	<ol style="list-style-type: none"> 1) Accept periodic reporting templates as grant requirements 2) Comply with periodic reporting terms per the grant agreement 3) Utilize the templates to educate and inform the grantmaking agency about

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	3) Provide technical assistance to state agencies, as needed	3) Utilize data provided through PFR and PPR templates for grant management		grant program delivery including the association of grant expenses to grant performance
<i>Grantee Compliance Enforcement System (GCES)</i>	1) Draft policy based on federal guidance and collaboration from state grantmaking agencies 2) Design systems to support statewide reporting of non-compliance 3) Implement, maintain and modify systems and policy as needed	1) Engage in the development and maintenance of policy and systems to support statewide use of the GCES 2) Utilize GCES to drive grantee compliance with grant requirements 3) Add non-compliant grantees to the Stop Payment List in accordance with the GCES framework 4) Promptly remove grantees from the Stop Payment List when non-compliance is resolved 5) Consult the Stop Payment List prior to issuance or modification of an award 6) Consult the Stop Payment List and associated notifications prior to grantee payment	No specific requirements	1) Ensure compliance with grant requirements 2) Work with the state awarding agency if instances of non-compliance occur