



**Grant Accountability and Transparency Act
Frequently Asked Questions
Office of Performance Management**

The **Grant Accountability and Transparency Act (“GATA” or “Act”)** is landmark legislation that increases accountability and transparency and reduces the administrative burden on State agencies and grantees. Once implemented, Illinois will have:

- A uniform notice of funding opportunity;
- A uniform prequalification process;
- A uniform grant application;
- Uniform programmatic and financial risk assessments;
- A uniform guideline for merit based reviews;
- A uniform grant agreement;
- A uniform budget reporting template;
- A centralized Catalog of State Financial Assistance opportunities (CSFA);
- A centralized debarred and suspended list;
- State-wide performance metrics and standards; and
- A centralized electronic document repository

The GATA Frequently Asked Questions (FAQs) are organized by topic.

Click on the Topic Heading to navigate to the topic’s FAQs, or view all questions beginning on page 2.

| Topic Heading | Page Number & Content |
|--|---|
| General | Page 2 General questions related to GATA rules and implementation |
| IDPH Implementation | Page 3 IDPH implementation, including EGrAMS |
| Pre-Qualification & Risk Assessment | Page 4 Pre-qualification requirements as well as fiscal & programmatic risk assessments |
| Notice of Funding Opportunity | Page 5 Uniform notice of funding opportunity |
| Application/Merit Based Review/Notice of Award | Page 6 Uniform grant application, including EGrAMS integration, merit based review & notice of award |
| Budget/Indirect Cost Rates | Page 7 Uniform budget template and indirect cost rates |
| Grant Agreement | Page 8 Uniform grant agreement |
| Post-Award | Page 8 Post-award questions including expenditure reporting & single audit requirements |
| Trainings & Resources | Page 9 Trainings and resources available to grantees, applicants, and IDPH employees |

I. General

1. What is GATA?

GATA (30 ILCS 708) implements the federal guidance and regulations codified at 2 CFR Part 200 (“Uniform Guidance”). The Act increases accountability and transparency, reduces administrative burden, establishes state-wide uniform processes for State and federal pass-through awards to non-federal entities throughout the grant life cycle, and provides training and technical assistance to State agencies and grantees.

2. Who is managing GATA implementation for the State?

Pursuant to GATA, the Grant Accountability and Transparency Unit (“GATU”) has been established in the Governor’s Office of Management and Budget (“GOMB”). GATU is charged with implementation of the Act in coordination with State grant-making agencies and grantees. Each grant-making agency is then responsible for implementing GATA in alignment with the State and federal guidance within their respective agencies.

3. When are the rules effective?

The rules are scheduled to become effective July 1, 2016 for Fiscal Year 2017 grants; however, the new federal requirements are already in effect for any new federal grant funding received by the State of Illinois.

4. What is the difference between the Federal Uniform Guidance and the State Proposed Rules?

The [Federal Uniform Guidance](#) became effective in Illinois for federal and pass-through awards on July 24, 2015. During Phase 1 of the Illinois GATA Implementation process, the Uniform Guidance was reviewed to determine if additional requirements for awards were needed. The [GATA Proposed Rules](#) include nine (9) proposed changes to the Uniform Guidance. The proposed rules were submitted to the Joint Committee on Administrative Rules (JCAR) for action and will apply to all grants awarded in Illinois.

5. Do the rules apply to all grants?

The State rules apply to all grants; however, there are sections of the rules that may only apply to specific types of grants, e.g., competitive grants. Likewise, there may be program-specific exemptions from the rules.

6. The word “should” is used throughout the proposed rules. Does it really mean “must?”

No. The word “must” is used to indicate requirements. The word “should” is used to indicate best practices or recommended approaches.

7. Will the rules only apply to awards made after the effective date, or does it apply to awards made earlier?

The rules apply to FY17 grants and all others awarded after the effective date. The State will not retroactively change the terms and conditions for funds that have already been awarded. The Federal Uniform Guidance became effective on July 24, 2015 and currently applies to all federally funded or Federal pass-through awards.

8. How will organizations that do business with IDPH be impacted by the changes to the grant-making rules?

The State rules and Federal Uniform Guidance generally consolidate and streamline grants administration which provides more efficient and consistent regulatory provisions for all types of grants. Overarching processes will be uniform and centralized, but many day-to-day practices will not be impacted.

CLICK HERE
to Return to the
Topic List

II. IDPH Implementation

1. What is the timeline for IDPH implementation?

IDPH is implementing the GATA rules in alignment with the statewide timeline, as directed by GATU. Details on specific IDPH deliverables are available on the IDPH website under Partner Resources.

2. Will IDPH continue to use EGrAMS?

Yes. IDPH will continue to use EGrAMS as its electronic grants platform until further notice.

3. What changes should we expect to see in EGrAMS?

The uniform Notice of Funding Opportunity will now be posted under the *Current Grants* section at idphgrants.com as well as in the *Show Documents* section in each application. In addition, the uniform grant application, uniform budget template, and uniform grant agreement will all be incorporated into the EGrAMS system. The new uniform documents will only be included in applications released after April 1, 2016.

4. How is information about IDPH GATA implementation distributed to potential applicants and grantees?

Potential applicants and grantees will receive GATA-related communication through EGrAMS, from IDPH program staff, and from IDPH GATA Coordinators. GATA coordinators will serve as a part of the ongoing communication on the implementation of the Grant Accountability and Transparency Act within IDPH. In addition, the EGrAMS website (idphgrants.com) and IDPH website (dph.illinois.gov) will be updated with important updates and information for applicants, grantees, and State employees.

5. Who participated in the GATA workgroups?

The GATA Workgroups consisted of State employees and grantees from across the state. IDPH had representatives from the appropriate content areas on each workgroup who participated in the rulemaking phase as well as the ongoing implementation phase.

6. How will an applicant or grantee know if there are programs exempt from the GATA rules?

IDPH grant-making offices will work to identify programs which may be exempt from the GATA rules. In the event that a program is approved by GATU to be exempt from the GATA rules (in whole or in part, i.e. exceptions) due to federal or statutory requirements, applicants and grantees will be notified. IDPH will publicly share the program exemptions and exceptions as they are made available.

7. How will multi-year awards be impacted?

Multi-year awards, if awarded prior to the GATA rules effective date, will not be impacted. Grants which require a new application and/or grant agreement each year to extend the grant will be subject to the rules.

8. Who do I contact if I have questions?

Applicants or potential grantees should contact the primary contact for their grant program. State employees should contact the GATA Coordinators in their respective office and/or the Chief Accountability Officer.

**CLICK HERE
to Return to the
Topic List**

III. Pre-Qualification & Risk Assessment

1. The new rules require a pre-qualification for all applicants. How will applicants complete this process?

The prospective grantee must register on the GOMB Grantee Portal and complete the electronic pre-qualification process for their agency prior to receiving a grant.

2. What information does the applicant agency need to complete the pre-qualification process?

To complete the pre-qualification process, the prospective grantee organization will need the following information:

- Organization name and address including Zip plus 4
- Federal Employee Identification Number (“FEIN”)
- Organization type (Local government, nonprofit, for profit, educational, etc.)
- Data Universal Numbering System (“DUNS”) number
- System for Award Management (“SAM”) Cage Code number (if organization receives federal funding)
- Month, day and year organization was founded/incorporated
- Organization affiliates (if yes, provide information above for each affiliate)
- Organization contact information (name, title, email, and phone number)

To complete the pre-qualification process, the prospective grantee individual will need the following information:

- Name and address including Zip plus 4
- Social Security Number

3. What is the difference between pre-qualification and risk assessment?

The pre-qualification process completed at the agency level was created by GATA (30 ILCS 708/25 (6)) to ensure that the prospective grantee has a current DUNS number, active SAMS cage code, acceptable fiscal conditions, and that they are in good standing with the Secretary of State, among other factors. This process also considers grant administration experience in determining the appropriate risk assessment process at the application level.

2 CFR 200.205 requires the awarding agency to review the risk posed by applicants. The Fiscal and Administrative Risk Assessment will be performed centrally. The Programmatic Risk Assessment will be conducted in the application process. Specific conditions will be imposed as result of the risk assessments to ensure monitoring and technical assistance, as appropriate.

4. Is the risk assessment process required for all grantees?

Yes. IDPH must assess all grantees for risk utilizing the Internal Controls Questionnaire and the Programmatic Risk Assessment Questionnaire.

5. How and when will applicants be notified of their risk status?

The prospective grantee will be notified of risks identified during the pre-qualification process upon completion of the pre-qualification requirements in the Grantee Portal. Fiscal and administrative risks as well as programmatic risks will be communicated prior to the signing of the grant agreement.

CLICK HERE
to Return to the
Topic List

IV. Notice of Funding Opportunity

1. What is the Notice of Funding Opportunity (“NOFO”)?

Structured to comply with 2 CFR 200.203 and Appendix 1 of the Federal Uniform Guidance, the NOFO is the official public notice of a grant opportunity offered by a State agency. It will be associated with the funding record in the Catalog of State Financial Assistance (“CSFA”) which will be a single, statewide, comprehensive source document of all State financial assistance program information. The NOFO is prepared by the State agency and informs potential applicants of the program requirements.

2. Where will the NOFO be posted?

The NOFO will be posted on the State-hosted grants website, www.grants.illinois.gov (website pending). The NOFO will also be included on EGrAMS under the *Current Grants* section and in the *Show Document* section during application entry.

3. Will the NOFO be posted for all grants?

No. The Federal Uniform Guidance and the proposed State Rules require the NOFO for competitive grants and cooperative agreements only. State agencies may choose to post a NOFO for non-competitive grants, but it is not required.

4. When will the NOFO be posted?

The awarding agency must generally make all competitive funding opportunities available for application for at least 45 calendar days and no less than 30 calendar days unless unusual circumstances arise. In accordance with this requirement, the NOFO will be posted at least 45 days (no less than 30, with exceptions) in advance of the application submission deadline.

5. What is included in the NOFO?

The uniform NOFO template includes, at a minimum:

- Grant Program Summary Information
- Agency-specific content including:
 - Program Description
 - Funding Information
 - Eligibility Information
 - Application and Submission Information
 - Application Review Information
 - Award Administration Information
 - State Awarding Agency Contacts
 - Other Information
- Links to mandatory forms (e.g., application available on EGrAMS)

6. Does the applicant have to go to the Grantee Portal if the NOFO is posted on EGrAMS?

Yes. While the NOFO, application process, and post-award components are in EGrAMS, applicants must complete the pre-qualification process and risk assessment processes in the Grantee Portal.

**CLICK HERE
to Return to the
Topic List**

V. Application/Merit Based Review/Notice of Award

1. How will the new uniform application be implemented in EGrAMS?

In compliance with 2 CFR 200, a uniform grant application template has been developed by the GATA workgroup. The template includes two sections – the Agency-completed section and the Applicant-completed section. IDPH has worked with our EGrAMS vendor to incorporate the Agency-completed section into the program content as the grant is designed and configured. The Applicant-completed section will be incorporated into the existing EGrAMS application.

2. How will applicants access the new uniform application?

Applicants will continue to access grant applications through the EGrAMS system at idphgrants.com.

3. What are the differences between the current EGrAMS application and the new uniform application template?

The EGrAMS application template will align with the uniform application template by adding the following components:

- Applicant's Organization Unit (Department Name and Division Name) added to Applicant Section
- Program Contact, Business/Administrative Contact, and Authorized Official Contact pages added and required for all applications
- Statewide applicability or specific county applicability checkboxes added to the Applicant section to incorporate the applicable areas affected by the project/program.
- Legislative and Congressional Districts of Program/Project added
- In the Budget section, applicants must identify the source of in-kind or cash funds
- Certification page language updated in alignment with GATA to include telephone number, fax number, and email address for Authorized Official certifying the application

4. When will the application be available in EGrAMS?

The new uniform application will only be implemented for applications released after April 1, 2016.

5. How will I know what the review process is for an application?

The review process will be described in the applicable NOFO.

6. Which grants will receive the merit based review?

Fully or partially funded federal, federal pass-through, and state funded competitive grants must receive a merit based review in compliance with GATA Legislation 30 ILCS 708 and 2 CFR 200 Uniform Guidance.

7. The Proposed State Rules include an appeals process for the merit based review. Does this mean that an applicant can appeal the award decision?

No. For merit based reviews, only the evaluation process is subject to appeal. Competitive grant appeals are limited to the evaluation process. Evaluation scores or award decisions may not be protested.

8. Is the Notice of State Award ("NOSA") a contractual agreement? Does this mean that the applicant was awarded the grant?

No. The NOSA is provided to the finalists and includes the terms and conditions of the award and specific conditions assigned to the grantee based on the Fiscal and Administrative, and Programmatic risk assessments.

CLICK HERE
to Return to
the Topic List

VI. Budget/Indirect Cost Rates

1. How will the new uniform budget template be incorporated into EGrAMS?

The EGrAMS budget will only be modified to include additional expense categories included in the Uniform Budget Template, as applicable, and to incorporate the source of in-kind and cash funds included in the application's budget.

2. Can program-specific expense categories be included in the application?

Yes. The Uniform Budget Template includes "Grant Exclusive Line Items" which allows for programs to add expense categories specific to their program needs.

3. Will additional training be provided on the budget template?

Yes. Additional training will be provided to address specific questions related to the uniform budget template.

4. What are indirect costs?

Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective.

5. How can a grantee charge an indirect cost rate to their grant?

There are now three options for indirect cost rates. 1) An approved, negotiated indirect rate approved by a cognizant federal agency or the Governor's Office of Management and Budget. 2) A de minimis rate, which is 10% of the direct costs. Agencies may use this option if they have never had a negotiated indirect cost rate and do not receive \$35,000,000 or more in federal funds (from all sources). 3) A restricted indirect cost rate that is included in 2 CFR 200 Appendix IV, or complies with other statutory policies.

6. Why does a grantee need a negotiated indirect cost rate?

In order to be reimbursed for indirect expenses associated with a project or program, an awardee must have a State or federally Negotiated Indirect Cost Rate Agreement ("NICRA") or, if eligible, elect to use the new 10% de minimis rate or Modified Total Direct Costs ("MTDC"). No indirect costs will be reimbursed without an approved rate.

7. Who qualifies for the new 10% de minimis rate?

An applicant may qualify for the 10% de minimis rate if they have never negotiated an indirect cost rate with the federal government. Once elected, it may be used indefinitely.

8. How does an organization obtain an indirect cost rate agreement from the State of Illinois?

GATA will have a Centralized Indirect Cost Unit available for negotiating rates in spring 2016. Qualified applicants must submit initial indirect cost rate proposals immediately following execution of the grant agreement, or no later than three (3) months after the effective date of the State award. Extensions are not allowed and indirect costs will not be reimbursed until the negotiation is finalized.

**CLICK HERE
to Return to the
Topic List**

VII. Grant Agreement

1. The template includes three (3) parts. What is included in each?

Part One contains the uniform requirements applicable to all awards in the State of Illinois. Part Two contains additional agency-specific requirements an agency may have for grants. Part Three contains the grant (program or project) specific requirements.

2. Will all State agencies be utilizing the new uniform grant agreement template?

Part One contains the uniform requirements applicable to all federally funded awards in the State of Illinois. We do not know at this time whether Part One will be used for state-funded awards as well.

3. Will there be IDPH specific content added to the grant agreement?

Yes. IDPH will include agency-specific requirements in Part Two of the grant agreement.

4. Who will populate the exhibits included in the template?

The exhibits will be populated by the IDPH program office issuing the award and may be populated by application content entered in EGrAMS.

5. Exhibit E is titled "Performance Measures". Who determines the content included in this section?

The performance-related reporting requirements and data points for reporting are described in this exhibit. This section may include program-created, IDPH-created, and/or GATA-created performance measures.

6. What are the attachments referenced in the uniform grant agreement?

The uniform grant agreement must include at least the following two attachments: the Final Approved Budget and Notice of State Award.

VIII. Post-Award

1. Will the budget template be utilized for expenditure reporting?

Yes. The uniform budget template format will be utilized for both the grant application and the expenditure reporting processes. The budget certification will also be incorporated into post-award expenditure reporting.

2. Will grants require greater emphasis on outcome and performance than in the past?

The State rules, modeled after the Federal Uniform Guidance, do place increased emphasis on the substantive outcomes and performance of grants than has been the case in the past. GATU, in accordance with the performance and financial monitoring and reporting outlined in 2 CFR Part 200, will measure the successful completion of projects and measure performance across all state agencies.

3. How is the Single Audit requirement changing?

The dollar threshold has been raised from \$500,000 to \$750,000. Agencies receiving \$750,000 or more in federal funds (from all sources) in a fiscal year beginning on or after December 26, 2014 shall have a single

[CLICK HERE
to Return to the
Topic List](#)



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Frequently Asked Questions
Office of Performance Management**

organization wide audit in accordance with 2 CFR 200 Subpart F. The audit requirements will apply to non-federal entities on the effective date of the State rules

IX. Trainings & Resources

1. Where can I learn more about GATA?

To learn more about GATA visit the GOMB Grant Accountability webpage [HERE](#), or visit the IDPH website under Partner Resources.

2. Are there any introductory trainings or resources that I can access now?

Yes, please visit the [Resource](#) Library on the Grant Accountability webpage. Trainings and webinars are available under the respective alphabetical category.

3. What training will be available for grantees?

GOMB is preparing training for grantees and State employees. In addition, IDPH will be developing supplemental guidance documents and trainings. Resources will also be made available to grantees and potential applicants through the EGrAMS system.

4. Where can I find IDPH-specific resources?

Resources for current and prospective grantees are available on the IDPH website under Partner Resources. IDPH employee resources are available on the IDPH intranet.

**CLICK HERE
to Return to the
Topic List**