

## PRESS Materials Responsive to GATA Fiscal and Administrative Risk Assessment July 2016

The *Grant Accountability and Transparency* Act (GATA, 30 ILCS 708/) was enacted on July 16, 2014 "to increase the accountability and transparency in the use of grant funds, from whatever source, and to reduce administrative burdens on both State agencies and grantees by adopting federal guidance and regulations applicable to such grant funds; specifically, the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (Uniform Guidance) codified at 2 CFR 200." 30 ILCS 708/5(b).

GATA is administered by the Governor's Office of Management and Budget via its Grant Accountability and Transparency Unit (GATU), which worked with the Illinois Single Audit Commission and volunteers from state agencies and grantees to develop administrative rules. GATA administrative rules at 44 Ill.Admin.Code Part 7000 became effective July 24, 2015. State agencies, including the Illinois State Board of Education (ISBE), are now implementing GATA requirements for the fiscal year 2017 grant cycle. See www.isbe.net/Pages/Grant-Accountability-and-Transparency-Act.aspx.

To prequalify for any grants awarded by ISBE, grantees must access the GATA website at <u>www.illinois.gov/sites/GATA/Grantee/Pages/default.aspx</u> and complete four pre-award requirements:

- 1. Grantee Registration
- 2. Grantee Pre-qualification
- 3. Fiscal and Administrative Risk Assessment (Internal Controls Questionnaire)
- 4. Programmatic Risk Assessment

Questions in the *Fiscal and Administrative Risk Assessment* ask whether grantees have written policies and procedures that guide program delivery on various topics. To assist districts in completing the *Fiscal and Administrative Risk Assessment*, these questions are excerpted below and followed by lists of PRESS materials responsive to each.

## Quality of management systems and ability to meet the management standards

- 1.1 Do you have written policies and procedures that guide program delivery on the topics of:
  - a. Quality assurance
    - 6:15 School Accountability
    - 6:170 Title I Programs
    - 6:170-AP1 Administrative Procedure Checklist for Development, Implementation, and Maintenance of Parental Involvement Compacts for Title I Programs
    - 6:170-AP1, E1 Exhibit District-Level Parental Involvement Compact
    - 6:170-AP1, E2 Exhibit School-Level Parental Involvement Compact
    - 6:170-AP2 Administrative Procedure Notice to Parents Required by No Child Left Behind Act of 2001
    - 6:210 Instructional Materials

b. Outcome tracking and reporting mechanisms

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	4:60	Purchases and Contracts	
	4:60-AP1	Administrative Procedure - Purchases	
	4:60-AP2	Administrative Procedure - Third Party Non-Instructional Contracts	
	4:60-AP3	Administrative Procedure - Criminal History Records Check of Contractor Employees	
	4:60-E	Exhibit - Notice to Contractors	
	4:80	Accounting and Audits	
	4:80-AP	Administrative Procedure - Checklist for Internal Controls	
C.	Relevant documentation of services/goods delivered		
	4:60	Purchases and Contracts	
	4:60-AP1	Administrative Procedure - Purchases	
	4:60-AP2	Administrative Procedure - Third Party Non-Instructional Contracts	
	4:60-AP3	Administrative Procedure - Criminal History Records Check of Contractor Employees	
	4:60-E	Exhibit - Notice to Contractors	
d.	Staff performance management policies and procedures		
	5:200	Terms and Conditions of Employment and Dismissal	
	5:220	Substitute Teachers	
	5:220-AP	Administrative Procedure - Substitute Teachers	
	5:220-E	Exhibit - Unsatisfactory Performance Report for Substitute Teachers	
	5:240	Suspension	
	5:240-AP	Administrative Procedure - Suspensions	
	5:280	Duties and Qualifications	
	5:285	Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers	
	5:285-AP	Administrative Procedure - Drug and Alcohol Testing for School Bus and Commercial Vehicle Drivers	
	5:290	Employment Termination and Suspensions	
	5:320	Evaluation	
e.	Personnel policies and procedures that include conflict of interest statements		
	4:30	Revenue and Investments	
	5:50	Drug- and Alcohol-Free Workplace; Tobacco Prohibition	
	5:120	Ethics and Conduct	
	5:120-AP1	Administrative Procedure - Statement of Economic Interests for Employees	
	5:120-AP2	Administrative Procedure - Employee Conduct Standards	
	5:120-E	Exhibit - Code of Ethics for Illinois Educators	
f.	Complaint/g	grievance resolution policies and procedures	

2:260 Uniform Grievance Procedure

- 2:260-AP1 Administrative Procedure Guidelines for Investigating Complaints and Allegations of Misconduct
- 2:260-AP2 Administrative Procedure Nondiscrimination Coordinator and Complaint Manager
- g. Governing body policies and procedures that include conflict of interest statements
  - 2:100 Board Member Conflict of Interest
  - 2:105 Ethics and Gift Ban
  - 4:30 Revenue and Investments
- Safeguarding funds, property and other assets against loss from unauthorized use or disposition
  - 4:10 Fiscal and Business Management
  - 4:20 Fund Balances
  - 4:30 Revenue and Investments
  - 4:50 Payment Procedures
  - 4:50-E Exhibit School District Payment Order
  - 4:55 Use of Credit and Procurement Cards
  - 4:55-AP Administrative Procedure Controls for the Use of District Credit and Procurement Cards
  - 4:55-E Exhibit Cardholder's Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards
  - 4:80 Accounting and Audits
  - 4:80-AP Administrative Procedure Checklist for Internal Controls
  - 6:160 English Learners
- i. Management of grant term extensions, where applicable
  - 4:80 Accounting and Audits

4:80-AP Administrative Procedure - Checklist for Internal Controls

- 1.3 Does the organization have written standards of conduct covering real or perceived conflict of interest related to actions of employees engaged in the selection, award or administration of contracts supported by grant awards?
  - 2:100 Board Member Conflict of Interest
  - 4:30 Revenue and Investments
  - 5:120 Ethics and Conduct
  - 5:120-AP1 Administrative Procedure Statement of Economic Interests for Employees
  - 5:120-AP2 Administrative Procedure Employee Conduct Standards
  - 5:120-E Exhibit Code of Ethics for Illinois Educators

## **History of Performance**

2.9 Does your organization have an implemented policy for sub-grantee monitoring?

There are no PRESS materials regarding sub-grantee monitoring. Please contact the IASB Office of General Counsel 630/629-3776 ext. 1219 for further explanation.

## Implementation

4.1 To what extent does your organization have policies to ensure programmatic expenses are reasonable, necessary and prudent (allowable)?

4:10	Fiscal and Business Management
4:20	Fund Balances
4:30	Revenue and Investments
4:50	Payment Procedures
4:50-E	Exhibit - School District Payment Order
4:55	Use of Credit and Procurement Cards
4:55-AP	Administrative Procedure - Controls for the Use of District Credit and Procurement Cards
4:55-E	Exhibit - Cardholder's Statement Affirming Familiarity with Requirements for Using District Credit and/or Procurement Cards
4:80	Accounting and Audits
4:80-AP	Administrative Procedure - Checklist for Internal Controls

4.2 To what extent does your organization have policies to ensure programmatic expenses are allowable?

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4:80-AP	Administrative Procedure - Checklist for Internal Controls