Local Government Registration

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Objectives

- Key terms for Local Governments
- Registration requirements
- Registration options
- How does Local Government registration affect:
  - Pre-Qualification
  - Internal Control Questionnaire (ICQ)
  - Indirect cost rate election
  - Audit
  - Illinois Stop Payment List
- How do we decide how to register?
- Using the Grantee Portal

Key Terms

- Local Government (2 CFR 200 §200.64)
  - Any unit of government within a state, including a: (a) County; (b) Borough; (c) Municipality; (d) City; (e) Town; (f) Township; (g) Parish; (h) Local public authority, including any public housing agency under the United States Housing Act of 1937; (i) Special district; (j) School district; (k) Intrastate district; (l) Council of governments, whether or not incorporated as a nonprofit corporation under state law; and (m) Any other agency or instrumentality of a multi-, regional, or intra-state or local government
- Registration in the Grantee Portal
  - Illinois' centralized approach to comply with federally required background checks
  - All entities must be registered to be eligible to receive grant funds from a state agency
  - www.grants.illinois.gov/portal

Key Terms (cont'd)

- Internal Control Questionnaire
  - Fiscal and administrative risk assessment
  - Required in the application process
- Illinois Stop Payment List
  - GATA requires GOMB maintain a list of individuals and entities ineligible (temporarily or permanently) to receive State of Illinois grant funds
  - Internally maintained Stop Payment list includes all grantees on Stop Payment Status
- Grantee Compliance Enforcement System (GCES)
  - Statewide uniform framework for administering the Illinois Stop Payment List
  - Provides a centralized approach for state agencies to manage occurrences of non-compliance with grant requirements

Registration Requirements

EACH registration must:

- Have a unique DUNS number
  - Be active in SAM.gov
- Have an FEIN
  - FEIN must match DUNS number in SAM.gov
- Not be on the Federal Debarred and Suspended List
- Not be on the Illinois Stop Payment List
- Not be on the DHFS Sanction List
- Specify Organization Type – Local Governments are NOT required to file with Secretary of State

Local Government Registration Options

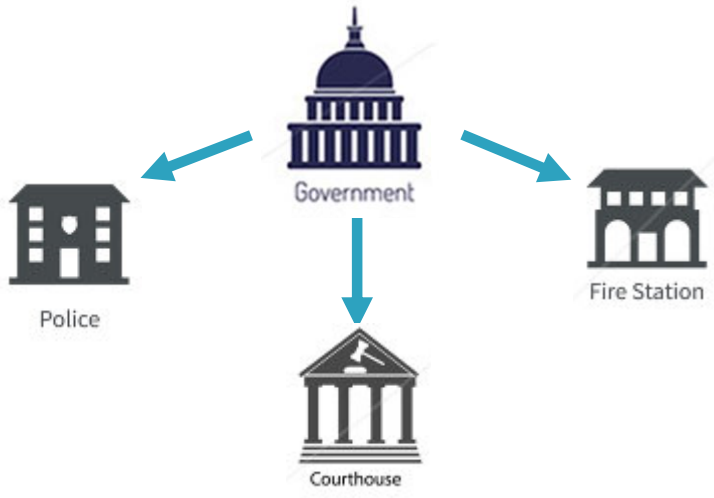
Centralized Registration

- All departments within the unit of local government operate centrally through one registration

Local Government Registration Options

Individual Department Registration

- Each department or division within the unit of local government registers, operate independently
  - May be appropriate to have one or more departments register separately with all other departments under one registration
- Parent/Child relationship is established



Centralized Registration

- One DUNS number – must match SAM.gov
- One FEIN – must match SAM.gov
- One ICQ assessing the risk profile for all departments as a whole
- One Indirect Cost Rate Election

- All Illinois grants awarded and payments must be made to the FEIN/DUNS registered

Centralized Registration (cont.)

- Every department or division utilizes the same DUNS, FEIN, risk assessment specific conditions and indirect cost rate election for State of Illinois grant awards
- Illinois Stop Payment List applies to the registered FEIN/DUNS
  - Noncompliance could result in withholding all payments for the Local Government until the issue is resolved

Individual Department / Division Registrations

Each Department/Division Registers and

- Must have a unique DUNS number
  - Must be active in SAM.gov
- All departments/divisions must use same FEIN
  - FEIN must match DUNS number in SAM.gov
    - One FEIN can be associated to multiple DUNS numbers
  - Must identify Parent registration
- Must complete an ICQ
- Must complete an Indirect Cost Rate election
  - Must have a Central Services Cost Allocation Plan

Individual Department / Division Registrations (cont'd)

- Grant awards and payments must be made to the associated FEIN/DUNS for each registration
- Illinois Stop Payment List applies to the registered FEIN/DUNS of the department / division AND the Parent registration
  - Noncompliance could result in withholding ALL payments to the applicable department / division AND the Parent until the issue is resolved

Audit Requirements

- Per Federal requirements, all grants are subject to audit
- All department/divisions of the Local Government can be covered by one audit
  - One FEIN = one audit
- GATA registration does not dictate the audit report coverage

How Do We Decide?

- Neither GATU nor state agency staff can tell you how to register
- Each local government must make that determination for themselves

However …

- We're here to help and can answer questions to assist you in making that decision

Things to Consider

- How does my unit of local government operate?
  - Centralized – majority of fiscal and administrative responsibilities flow through one department/division
  - Decentralized – each department/division is responsible for the majority of their own fiscal and administrative responsibilities
- Does each individual department/division have the ability to make an indirect cost rate election?
- How is the audit conducted?

2 CFR 200: "Governmental Department or Agency Unit"

- Appendix VII of 2 CFR 200 contains a threshold of $35 million in direct federal funding and refers to a governmental department or agency unit
  - A centralized registration would apply this threshold to the total direct federal funds received by the unit of Local Government as a whole
  - An individual department/division registration would apply this threshold individually to the direct federal funds received by that individual department/division

We've Decided – Now What?

Grantee Portal Registration

- Instructions are available at
  www.grants.Illinois.gov
- Each user must register separately for an Illinois.gov Public Account or an Illinois.gov Partner Account
- Once registered, access the portal from the Grantee Links tab of the GATA website
- The first time you enter, you will be prompted for the DUNS number of the registration you would like to access

Grantee Portal Registration

- If the DUNS number is already registered, the person that did that registered authorizes Grantee Portal access; you control portal management
- If the DUNS is not registered, organizational information will be required:
  - FEIN
  - Organization Type (Government Entity)
  - Organization Name
  - Organization Address
  - Primary Email
  - Primary Phone
  - Fiscal Year End Date
  - Does this organization have 2 or more years experience with Illinois grants?

Grantee Portal Registration (cont'd)

- Grantee Portal users can be associated with multiple DUNS numbers
- This is managed through the "Grantee Portal Access" section by clicking 'Manage'
  - Select the User to edit
  - 'Click Here' at the statement "To associate your account with additional organization"
- From Grantee Portal Access, identify what notifications each user should be receiving
  - Set authority for who can approve new user access

Grantee Portal Registration (cont'd)

- Organization Contacts section of the Grantee Portal identifies key personnel for your local government
  - Organization Contacts are only visible to State agency staff
  - Organizational contacts do not receive notifications or have Grantee Portal access unless they are also in the Grantee Portal Access list

In Conclusion

- For detailed instructions:
  - www.grants.Illinois.gov under the Grantee Links tab

- The determination of how to register is key to:
  - The completion of the ICQ
  - The indirect cost rate elections
  - The GCES
  - And last but definitely not least, how State agencies communicate through the Grantee Portal with each Local Government.

Questions?

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