

Funding Restrictions

- a) Federal Financial Guide. Applicants must follow the current edition of the Department of Justice Grants Financial Guide which details allowable and unallowable costs is available at:
<https://www.ojp.gov/funding/financialguidedojo/overview>. Costs may be determined to be unallowable even if not expressly prohibited in the Federal Financial Guide.
- b) Prohibited Uses. The following is a non-exhaustive list of services, activities, goods, and other costs that cannot be supported through this NOFO:
- Land acquisition
 - New construction
 - A renovation, lease, or any other proposed use of a building or facility that will either result in a change in its basic prior use or significantly change its size
 - Minor renovation or remodeling of a property either listed or eligible for listing on the National Register of Historic Places or located within a 100-year flood plain
 - Implementation of a new program involving the use of chemicals
 - Capital expenditures
 - Fundraising activities
 - Most food and beverage costs
 - Audits (agencies receiving less than \$750,000 in cumulative federal funds)
 - Capital expenses; property losses and expenses, real estate purchases, mortgage payments, construction, and most capital improvements
 - Compensation for victims of crime
 - Crime prevention
 - Lobbying and advocacy with respect to legislation, regulations or administrative policy
 - Most medical care costs
 - Tort or criminal defense services
 - Active investigation and prosecution of criminal activities, and witness activities
 - Research and studies, except for project evaluations
 - Salaries and expenses for management, unless expressly allowed in the VOCA Final Rule
- c) Allowable expenses. All expenses must be reasonable, necessary, and allocable to the program.
- d) Pre-Award Costs. No costs incurred before the start date of the grant agreement may be charged to awards resulting from this funding opportunity.

e) Pre-approvals. Prior approvals may affect project timelines. Submission of materials for ICJIA approval should be incorporated into the application Implementation Schedules. ICJIA may require prior approval of the following:

- Out-of-state travel
- Certain Requests for Proposals, procurements, and sub-contracts
- Conference, meeting, and training costs

f) State Travel Guidelines. Travel costs charged to ICJIA must conform to State Travel Guidelines, found here:

<https://cms.illinois.gov/employees/travel/travelreimbursement.html>. Out-of-state hotel rates are based on the General Service Administration (GSA) guidelines found here: <https://www.gsa.gov/travel/plan-book/per-diem-rates>. Applicant agencies with lower cost travel guidelines than the State of Illinois must use those lower rates.

g) Supplanting. Supplanting is to deliberately reduce state or local funds because of the existence of federal funds.

Federal funds must be used to supplement existing state and local funds for program activities and must not replace those funds that have been appropriated for the same purpose. Supplanting will be the subject of application review, as well as pre-award review, post-award monitoring, and audit. If there is a potential presence of supplanting, the applicant or grantee will be required to supply documentation demonstrating that the reduction in non-federal resources occurred for reasons other than the receipt or expected receipt of federal funds. For certain programs, a written certification may be requested by the awarding agency or recipient agency stating that federal funds will not be used to supplant state or local funds.

If funds will be used for the expansion of an already implemented program, applicants must explain how proposed activities will supplement—not supplant—current program activities and staff positions.

h) Proposed Subawards and Subcontracts. Applicants may propose to enter into subawards or subcontracts under this award, each of which involve different rules and applicant responsibilities. A subaward carries out a portion of the grant agreement while a contract is often for obtaining goods and services for the grantee's own use. (44 Ill. Admin Code 7000.240). If a third party will provide some of the essential services or develop or modify a product that the applicant has committed to provide or produce, ICJIA may consider the agreement with the third party a subaward for purposes of grant administration.

Applicants must classify each expense in the contractual budget as a subaward or subcontract. The substance of the agreement, not the title or structure of the agreement, will determine whether it is a subaward or a subcontract. Applicants are advised to use the “Checklist for Contractor/Subrecipient Determinations” available at the GATA Resource Library for guidance: <https://gata.illinois.gov/resources.html>.

Applicants are required to justify their use of subawards and explain their capacity to serve as “pass-through” entities in the program narrative. Applicants will monitor subaward compliance with grant terms, applicable federal and state law including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Award, 2 C.F.R. Part 200, GATA, and ICJIA policies. Proposed subawards must be identified, if possible, and their roles described in both the program and budget narratives.

For procurement contracts, applicants are encouraged to promote free and open competition in awarding contracts. All subcontracts must comply with federal and state requirements.