

 ILLINOIS CRIMINAL JUSTICE INFORMATION AUTHORITY	Subject: Transportation Policy for Program Participants	
	Department: OGC	
	Effective Date: 8/5/2024	
General Counsel Signature: <i>Kristina Dion</i>		Date: 7/29/2024
Executive Director Signature: <i>Debrice J. Adams</i>		Date: 7/29/2024

- I. **POLICY STATEMENT:** This policy outlines policies and procedures for grantees using State and Federal funds to provide transportation for program participants. This policy supersedes all previous policies related to transportation for program participants, including, but not limited to the Transportation Policy dated November 13, 2019, the Transportation Policy Update dated August 4, 2021, the Vehicle Policy, dated January 18, 2023, and the Vehicle Policy Memo dated July 26, 2023.

II. DEFINITIONS

- a. GATA: Grant Accountability and Transparency Act, 30 ILCS 708/1 *et. al.*
- b. Luxury Vehicle: Luxury vehicles are passenger automobiles built by recognized luxury automakers. The generally accepted list of luxury brands includes Acura, Alfa Romeo, Aston Martin, Audi, Bentley, BMW, Bugatti, Cadillac, Ferrari, Genesis, Infiniti, Jaguar, Lamborghini, Land Rover, Lexus, Lincoln, Lotus, Maserati, McLaren, Mercedes-Benz, Porsche, Rolls-Royce, Tesla, and Volvo.¹

III. PROGRAMMATIC PURPOSE FOR PROVIDING TRANSPORTATION

- a. The budget narrative should explain the allowable programmatic purpose for providing transportation.
 - i. State Grants
 1. State grants must comply with GATA and 2 CFR 200.
 - a. Transportation costs must be “necessary and reasonable for the performance of the [grant].” 2 CFR 200.403.
 - b. For example, a reentry program with a goal of employment placements could provide a bus pass for a participant to attend a job interview.
 - ii. VOCA

¹ Scott Hinderer, *What is a Luxury Car?*, Kelley Bluebook, Oct. 11, 2021, <https://www.kbb.com/what-is/luxury-car/>.

1. In addition to GATA and the 2 CFR 200, VOCA grants must comply with the VOCA Final Rule. 28 CFR 94. VOCA allows for transportation costs to victims of crime for the following purposes:
 - a. To respond to a victim of crime's immediate emotional, psychological, and physical health and safety. 28 CFR 94.119(a).
 - i. For example, grantees may provide transportation for a victim to go to emergency shelter.
 - b. To allow a victim who is not a witness to participate in criminal justice or other public proceedings arising from the crime. 28 CFR 94.119(e)(3).
 - i. For example, grantees may provide transportation for a victim to attend a hearing for a Plenary Order of Protection.
 - c. To receive services. 28 CFR 94.119(i).
 - i. The underlying service necessitating the transportation must be an allowable expense under the VOCA rule. For example, Grantees may provide transportation for a victim to attend grant program services.

IV. AVAILABLE TRANSPORTATION MODELS

- a. The following types of transportation models are available to grantees²:
 - i. Public Transportation
 1. Grantees may purchase transportation cards and tickets to give to program participants to use public transportation (CTA cards, bus cards, Metra tickets, etc.).
 2. Grantees are required, in their budget, to breakout the number of trips and the total cost for public transportation.
 3. A tracking system for public transportation should anticipate that at the end of the period of performance, grantees must return to ICJIA the monetary equivalent of any unused cards and tickets totaling over \$100.
 - ii. Taxi and Ride Share
 1. Grantees may purchase taxi or ride share fares to transport program participants.
 2. Grantees may contract with a taxi company or ride share company to provide transportation for program participants. Grantees must follow ICJIA's subcontract policies.
 3. Grantees are required, in their budget, to breakout the number of trips and the total cost for ride share.
 4. In using a tracking system for ride share, grantees should be aware that while ride share companies have proprietary databases that grantees can use to track rides, grantees are responsible for ensuring that the required data is collected

² Grantees are not limited to choosing one transportation model and may use a combination of the transportation models.

for the grantee's records, subject to relevant confidentiality and privacy provisions contained in the grant agreement.

iii. Gas Cards

1. Grantees may purchase gas cards for program participants to use for allowable programmatic purposes. More economical methods of travel should be explored first, however gas cards may be distributed when more economical means of transportation are not available.
2. Grantees are required to breakout, in their budgets, the estimated total dollar amount of gas cards that will be purchased, the individual gas card amount, and the total number of gas cards that the program will purchase for program participants. While this policy does not place a ceiling on the amount that can be issued to a gas card, grantees must ensure gas cards are distributed in reasonable amounts that reflect the actual cost of gas.
3. A tracking system for gas cards must document the reason the gas card is being distributed to the program participant, the last four numbers on the back of the gift card, the value of the gift card, the date the gas card was distributed, the staff that distributed the card, the program participant that received the card and a signed certification from the program participant that the gas card will be used for allowable programmatic purposes. Grantees must return to ICJIA the monetary equivalent of any unused gas cards totaling over \$100.

iv. Agency-Owned Vehicles

1. Grantees may allow their staff to use an agency-owned vehicle to transport program participants.
2. Grantees are required to breakout, in their budgets, the cost for fuel³ and the prorated costs for repairs, regular maintenance and insurance.
3. Grantees must carry insurance on the vehicle that covers use of the vehicle on the job and ensure that staff driving the vehicle have valid driver's licenses.
4. A tracking system for agency owned vehicles must document the use of the vehicle by staff, date, time, purpose of each trip, beginning and end destinations traveled, and mileage per trip.

v. Agency Staff Members' Personal Vehicles

1. Grantees may allow their staff to use their personal vehicles to transport program participants.
2. Grantees may reimburse personnel for their mileage costs at the current State mileage reimbursement rate and the prorated cost of car insurance.
3. In their budgets, Grantees must estimate total mileage costs and provide an explanation of how the grantee estimated the total mileage for the grant period. The budget narrative must provide an explanation of how the grantee estimated the number of trips and the cost to budget.

³ Grant funds cannot be used to reimburse for mileage costs on an agency owned, leased, or purchased vehicle.

4. Grantees must confirm that staff vehicles are insured, and that the insurance policy covers use of the vehicle on the job. Grantees are also responsible for ensuring that staff members have valid driver's licenses.
5. A tracking system for using agency staff member's vehicles must document the use of the vehicle by staff, date, time, purpose of each trip, beginning and end destinations traveled, and mileage per trip.

vi. Vehicle Lease

1. Grantees may lease a vehicle to transport program participants.
2. Grantees must identify the need for a vehicle lease during the application process. Requests to lease a vehicle made after the initial grant agreement is executed will not be granted.
3. In their budget narrative, Grantees must explain why a vehicle lease is an appropriate model for the grantee's use, why the lease of a vehicle is essential to the grant program and why other transportation models are not adequate. The explanation should also include a statement as to the cost effectiveness of the lease over other means of transportation. Grantees must explain how the choice for a specific vehicle was made and whether a competitive process was used. Grantees must follow ICJIA's subcontract policies.
4. Grantees are required to breakout, in their budgets, the cost for fuel and the prorated costs of repairs, car insurance and regular maintenance on the vehicle.
5. Grantees may not lease a luxury vehicle and cannot use grant funds to make a down payment on a leased vehicle.
6. Grantees must carry insurance on the vehicle that covers use of the vehicle on the job and ensure that staff driving the vehicle have valid driver's licenses.
7. Grantees must submit a description of their tracking system, which must document the use of the vehicle by staff, date, time, purpose of each trip, beginning and end destinations traveled, and mileage per trip.

vii. Vehicle Purchase

1. Subject to approval by the General Counsel or a designee, government agencies may purchase a vehicle to transport program participants. Non-governmental agencies may not purchase vehicles with grant funds.
2. Grantees must identify the need for a vehicle purchase during the application process. Requests to purchase a vehicle made after the initial grant agreement is executed will not be granted.
3. In their budget narrative, Grantees must explain why a vehicle purchase is an appropriate transportation model for the grantee's use, why the purchase is essential to the grant program, and why other transportation models are not adequate. The explanation should also include a statement as to the cost effectiveness of the purchase over other means of transportation. Grantees must explain how the choice for a specific vehicle was made and whether a

competitive process was used. Grantees must follow ICJIA's subcontract policies, if applicable.

4. Grant funds shall not be used to provide reimbursement for the purchase price of a vehicle purchased, owned, or possessed by the entity prior to the period of performance.
 5. Grantees are required to breakout, in their budgets, the cost of fuel and the prorated cost of repairs, car insurance, and regular maintenance on the vehicle.
 6. Grantees may not purchase a luxury vehicle using grant funds.
 7. Grantees must carry insurance on the vehicle that covers use of the vehicle on the job and ensure that staff driving the vehicle have valid driver's licenses.
 8. Grantees must submit a description of their tracking system, which must document the use of the vehicle by staff, date, time, purpose of each trip, beginning and end destinations traveled, and mileage per trip.
 9. Upon approval of a vehicle purchase, Grant specialists will provide the grantee with the Grantee Vehicle Purchase Guide. Grantees must comply with all requirements stated therein.
- b. Grantees must state in the budget the transportation model that will be used by their program.
 - c. Grantees must have a tracking system wherein data is collected, stored, and can be made available to ICJIA staff upon request. A tracking system, must, at a minimum, track the purpose and cost of each trip. Additional data may be necessary depending on the transportation model used by the grantee (see below for additional information). It is not necessary for the grantee to describe their tracking system in the budget narrative.
 - d. Examples
 - i. A VOCA grantee is a domestic violence program. A program participant has requested assistance with transportation to attend a court date where she is the defendant. Staff cannot use VOCA funded transportation assistance in this instance because the program participant is not being transported to a criminal justice proceeding that is related to their victimization.
 - ii. A VOCA grantee is a Trauma Recovery Center (TRC) and has purchased bus cards for program participants to access services. A program participant requests assistance with transportation to the TRC from their home. Staff at the TRC may give the program participant a bus card with enough bus fare for round trip transportation to the participant's appointments at the TRC. The TRC staff should track the distribution of the bus card in their records.
 - iii. An R3 grantee provides a re-entry program. In its budget, the grantee has included a line item to purchase bus tickets for participants, so they may attend re-entry programs, attend job fairs, and go to job interviews. The grantee has submitted a description of its controls to ensure that the bus cards are issued to program participants for programmatic purposes. This is allowable under the grant.
 - iv. An R3 grantee is provides a re-entry program. In its budget, the grantee has a line item for re-loading Ventra cards for all participants, allowing them to travel for any reason.

Here, the travel is not related to any programmatic need. The grantee must narrow the scope of the travel or remove it.

V. QUESTIONS OR CONCERNS

- a. Questions or concerns about this policy should be directed to CJA.AgencyPolicy@illinois.gov. Agency staff should complete a Policy Comment Form as described in the Policy Approval and Implementation Policy.