**Victims of Crime Act (VOCA)**

**Human Trafficking**

**NOFO # 1745-0724**

## *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: [human traffickingtps://ojp.gov/financialguide/doj/pdfs/DOJ\_FinancialGuide.pdf](https://ojp.gov/financialguide/doj/pdfs/DOJ_FinancialGuide.pdf). Costs may be determined to be unallowable even if not expressly prohibited in the Federal Financial Guide. Costs may be determined to be unallowable by ICJIA even if not expressly prohibited in the Federal Financial Guide.

b) Unallowable Costs. 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
* Lobbying
* Criminal defense and tort action
* Direct compensation for victims of crime

c) Allowable expenses. All expenses must be reasonable, necessary, and allocable to the program. Funds shall be used only to improve services for and/or the response to victims of sexual assault in persons who have experienced human sex trafficking. Activities unrelated or only tangentially related to the provision of direct services to victims are not eligible for support.

d) Pre-Award Costs**.** Pre-award costs are allowed only if the costs are directly pursuant to the negotiation and in anticipation of the award and where such costs are necessary for efficient and timely performance of the program deliverables, or milestones incorporated in the contract. Such costs are allowable only to the extent that they would have been allowable if incurred after the award start date. 2 CFR 200.458.

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:

[humantraffickingtps://www2.illinois.gov/cms/Employees/travel/Pages/TravelReimbursement.aspx](https://www2.illinois.gov/cms/Employees/travel/Pages/TravelReimbursement.aspx). Out-of-state hotel rates are based on the General Service Administration (GSA) guidelines found here: [human traffickingtps://www.gsa.gov/travel/plan-book/per-diem-rates](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) Proposed Subawards and Subcontracts. Applicants may propose to enter 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 of a subcontract. Applicants are advised to use the “Checklist for Contractor/Subrecipient Determinations” available at the GATA Resource Library for guidance: [humantraffickingtps://www.illinois.gov/sites/gata/pages/resourcelibrary.aspx](https://www.illinois.gov/sites/gata/pages/resourcelibrary.aspx).

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.