



Grant Accountability And Transparency Act (GATA)

FY18 Programmatic Risk Conditions
October 2017



Risk Management

Both the federal Uniform Guidance and GATA are based on risk management and the improvement of performance.

Risk management includes assessment and mitigation of risks.



Uniform Guidance

Sections 200.205 and 200.331 of the Uniform Guidance require the review of risk posed by grant applicants.

Sections 200.207 and 200.331 of the Uniform Guidance describe the application of risk mitigating conditions to grants in cases of assessment of elevated risk.



GATA

Adopts the federal uniform guidance (2 CFR 200 “super circular”) for all grants and develops supplemental rules for areas not addressed by the federal regulations.

Section 25 of GATA also requires the review of risk posed by grant applicants and the development of standard specific risk mitigating conditions.



GOMB GATU

The GATA Unit (GATU) of the Governor's Office of Management and Budget (GOMB) has developed a standard programmatic risk assessment and standard risk mitigating conditions.



GATA Exemptions

GATU has approved a limited number of exemptions to GATA for certain programs.

The following ISBE programs are exempt from GATA and the programmatic risk assessment and condition requirement.



Exempt Programs

- GSA/EBF funding
- Special Education MCATS
- Transportation
- Driver Education
- Reorganization Incentives



Programmatic Risk Assessment

You are required to complete a programmatic risk assessment for each non-exempt grant for which you apply in FY18.

For electronic grants in EGMS the risk assessment was incorporated into the grant application as new tabs.



Programmatic Risk Conditions

Assessment of elevated risk leads to the application of risk mitigating conditions. The conditions are included in the NOSA tab of your grants.

The conditions included are in the generic language developed as a statewide standard.



EGMS

Overview	Applicant Information	Funded Program	Program Risk Assessment	GATA Pages	Assurance Pages	Submit	Application History	Page Lock Control	Application Print
		Notice of State Award	Uniform Grant Agreement						
NOSA - Grant Information			Prequalification Status	ICQ Conditions		Program Risk Conditions			

Conditions - Program Risk Assessment

[Instructions](#)

PRA Section 1. Quality of Management Systems and ability to meet management standards

[No additional conditions imposed](#)





ISBE Condition Implementation

ISBE is phasing in the implementation of the conditions in FY18.

ISBE has developed ISBE specific conditions for FY18. Those definitions are highlighted on the next slide and posted to the ISBE website under the “Grants - GATA” topic.



ISBE Specific Conditions

Risk Category	Medium Risk Standard Condition Description	FY18 ISBE Medium Risk Requirement	High Risk Standard Condition Description	FY18 ISBE High Risk Requirement
Quality of Management Systems and ability to meet management Standards	Requires technical assistance required.	Not applicable in FY18	Requires technical assistance required, plus more frequent project monitoring (desk review and/or on-site).	Grantees are required to have quarterly TA calls with ISBE program staff. Grantees may be subject to more frequent site visits.
History of Performance - Internal	Requires more detailed and more frequent programmatic reporting.	Not applicable in FY18	Requires more detailed and more frequent programmatic reporting, plus additional project monitoring (desk review and/or on-site).	Grantees are required to provide monthly performance reports. Grantees may be subject to more frequent site visits.
History of Performance - External (sub-grantee / sub-recipient / sub-award)	Requires grantee must report performance data for the sub-grantee/sub-recipient / sub-award.	Not applicable in FY18	Requires grantee must report performance data for the sub-grantee/sub-recipient / sub-award, plus report on sub-grantee / sub-recipient / sub-award project monitoring.	Grantees must provide quarterly performance reporting for subgrantees and quarterly reports on subgrantee monitoring activities.
Compliance - Audit reports and findings	Requires desk review of the status of implemented corrective action.	Requires desk review of the status of implemented corrective action.	Requires on-site review or Agreed Upon Procedures (AUP) of applicable area(s).	Requires on-site review of applicable area(s).
Implementation of statutory, regulatory or other requirements	Requires technical assistance required.	Not applicable in FY18	Requires technical assistance required, plus more frequent project monitoring (desk review and/or on-site).	Grantees are required to have quarterly TA calls with ISBE program staff. Grantees may be subject to more frequent site visits.



Questions

- The [ISBE.net/GATA](https://www.isbe.net/GATA) website includes steps, links, and FAQs.
- Questions regarding GATA implementation at ISBE can be directed to gata@isbe.net for assistance.