

Illinois Emergency Management Agency  
*Federal Preparedness Grant Programs*



Policy Manual  
October 26, 2022



## ILLINOIS EMERGENCY MANAGEMENT AGENCY

JB Pritzker  
Governor

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Director

### INTRODUCTION:

The Illinois Emergency Management Agency (IEMA) is designated by the Governor as the U.S. Department of Homeland Security (DHS) State Administrative Agency and, as such, is responsible for grant management and administration for the allocation of federal preparedness funds to subrecipients. In ensuring compliance with all requirements contained in DHS Notices of Funding Opportunity, the director of IEMA will authorize issuance of clarifying guidance to subrecipients, as needed.

The Illinois Terrorism Task Force (ITTF) serves in an advisory capacity to the Governor and the Governor's Homeland Security Advisor. The ITTF provides recommendations and subject matter expertise on homeland security laws, policies, protocol, and procedures. Through a diverse partnership of local, state and federal government representatives, as well as private and non-governmental organizations, the ITTF's primary focus is on establishing and maintaining long-term strategic strategies to confront threats and realities of terrorism and all hazards, including technological, chemical, man-made and natural disasters, and major events. The ITTF also serves as the state homeland security strategic planning and policy advisory body for U.S. Department of Homeland Security grant programs. In this role, the ITTF is the state's Senior Advisory Committee, ensuring that all available preparedness funding sources are effectively utilized in a collaborative manner to ensure a strategic approach.

This manual has been developed to maintain the policies enacted by the Illinois Emergency Management Agency and is not intended to supersede any federal laws, regulations or policies of federal preparedness funding. In reformatting the policy statements in this manual with a new numbering system, some existing policies were combined and/or updated. At the bottom of each policy is a notation indicating if the policy replaces an existing policy or policies (e.g., "Supersedes Policy Statement 2014 (2)") or if the policy content remains essentially the same as the previous version(s) (e.g., "Previously Policy Statements 2009 (3) and 2009 (4)").



## Record of Changes

When changes are made to these policies, the following procedures will be followed:

1. Changes will be issued by the Illinois Emergency Management Agency (IEMA) and transmitted to agencies, personnel, and other designees specified by the IEMA Director.
2. When a change is made, an entry will be made on the following log.

Change Number	Effective Date of Change	Policy Number Changed	Entered by
1	10/1/2016	2.7	Michelle Hanneken
2	1/10/2017	3.1	Michelle Hanneken
3	1/10/2017	2.1	Michelle Hanneken
4	1/10/2017	1.1 (deleted)	Jenifer Johnson
5	1/10/2017	2.4	Jenifer Johnson
6	1/10/2017	2.5	Jenifer Johnson
7	1/10/2017	2.7	Jenifer Johnson
8	1/10/2017	2.8 (deleted)	Jenifer Johnson
9	1/10/2017	2.9	Jenifer Johnson
10	1/10/2017	3.3	Jenifer Johnson
11	1/19/17	3.2	Jenifer Johnson
12	1/19/17	1.5 (added)	Jenifer Johnson
13	5/15/17	2.7	Jenifer Johnson
14	10/1/18	2.8 (added)	Jenifer Johnson
15	11/1/21	2.11 (added)	Renyscha Brown
16	10/26/22	2.4	Bob Evans
17	10/26/22	2.12 (added)	Bob Evans

## Crosswalk – Current and Former Policies

Current Policy	Former Policy
1.2 NIMS Compliance	New policy (last NIMS policy was 2014 (7) NIMS Compliance for Federal Fiscal Years 2014 and 2015)
1.3 Use of Federal Preparedness Funds for Educational Sessions	2014 (2) Use of Federal Preparedness Training Funds
1.4 Use of Federal Preparedness Funds for Maintenance	2014 (6) Use of Federal Preparedness Funds for Maintenance Costs
2.1 Environmental and Historic Preservation (EHP) Review Process	2009 (9) Environmental Planning and Historic Preservation (EHP) Requirements for Grants
2.2 Use of Federal Preparedness Funds for Travel	2014 (5) Use of Federal Preparedness Funds for Travel
2.3 Equipment Policy	2009 (3) Grant Reimbursement Supporting Documentation Requirements  2009 (4) Automated Central Inventory Requirement for Property with Manufacturer's Expiration Date  2009 (7) Leasing or Rental of Storage Space for Equipment Purchased with Federal Preparedness Funds  2012 (2) Equipment Purchased with Federal Funds
2.4 Purchase of Vehicles/Storage, Maintenance and Use of CBRNE Response Vehicles	2009 (2) Storage, Maintenance and Use of CBRNE Vehicles  2012 (4) Vehicle Purchase
2.5 Lunch Provided for Homeland Security Training, Exercise Sessions, Meetings or Conferences	2014 (3) Meals Provided for Homeland Security Training/Exercise Sessions, Meetings or Conferences
2.6 Milestone Contracts	2012 (5) Milestone Contracts
2.7 Overtime and Backfill (OTB) Reimbursement and Volunteer Stipend	2007 (5) Training Overtime/Backfill Reimbursement and Volunteer Stipend
2.9 "Multi-Purpose" Funds	New policy
2.10 Use of Matching Funds	New policy
3.1 Submission of Reimbursement Requests and Overpayment to Subrecipients	2009 (12) Overpayment to Subrecipients  2011 (3) Submission of Reimbursement Requests
3.2 Federal Reporting Requirements and Grant Closeout Procedures	2015 (1) Federal Reporting Requirements and Grant Closeout Procedures
3.3 Subrecipient Monitoring	2012 (1) Subrecipient Monitoring

Former policy	Current policy
2007 (5) Training Overtime/Backfill Reimbursement and Volunteer Stipend	2.7 Overtime and Backfill (OTB) Reimbursement and Volunteer Stipend
2009 (2) Storage, Maintenance and Use of CBRNE Vehicles	2.4 Purchase of Vehicles/Storage, Maintenance and Use of CBRNE Response Vehicles
2009 (3) Grant Reimbursement Supporting Documentation Requirements	2.3 Equipment Policy
2009 (4) Automated Central Inventory Requirement for Property with Manufacturer's Expiration Date	2.3 Equipment Policy
2009 (7) Leasing or Rental of Storage Space for Equipment Purchased with Federal Preparedness Funds	2.3 Equipment Policy
2009 (9) Environmental Planning and Historic Preservation (EHP) Requirements for Grants	2.1 Environmental and Historic Preservation (EHP) Review Process
2009 (12) Overpayment to Subrecipients	3.1 Submission of Reimbursement Requests, Reimbursement Timeframes and Overpayment to Subrecipients
2011 (3) Submission of Reimbursement Requests	3.1 Submission of Reimbursement Requests, Reimbursement Timeframes and Overpayment to Subrecipients
2012 (1) Subrecipient Monitoring	3.3 Subrecipient Monitoring
2012 (2) Equipment Purchased with Federal Funds	2.3 Equipment Policy
2012 (4) Vehicle Purchase	2.4 Purchase of Vehicles/Storage, Maintenance and Use of CBRNE Response Vehicles
2012 (5) Milestone Contracts	2.6 Milestone Contracts
2014 (2) Use of Federal Preparedness Training Funds	1.3 Use of Federal Preparedness Funds for Educational Sessions
2014 (3) Meals Provided for Homeland Security Training/Exercise Sessions, Meetings or Conferences	2.5 Lunch Provided for Homeland Security Training, Exercise Sessions, Meetings or Conferences
2014 (5) Use of Federal Preparedness Funds for Travel	2.2 Use of Federal Preparedness Funds for Travel
2014 (6) Use of Federal Preparedness Funds for Maintenance Costs	1.4 Use of Federal Preparedness Funds for Maintenance
2015 (1) Federal Reporting Requirements and Grant Closeout Procedures	3.2 Federal Reporting Requirements and Grant Closeout Procedures

# Section I

## Pre-award Phase

**NIMS Compliance**  
**Effective: April 15, 2016**

**Policy 1.2**

**PURPOSE:**

To clarify National Incident Management System (NIMS) compliance requirements for subrecipients of federal preparedness funding. The FY 2016 Department of Homeland Security (DHS) Notice of Funding Opportunity states that funding recipients must “ensure and maintain adoption and implementation of NIMS.” This policy statement explains how the state of Illinois will ensure this requirement is met.

**SCOPE:**

This policy applies to subrecipients of the following DHS federal preparedness grant programs: Emergency Management Performance Grant (EMPG) and Homeland Security Grant Program (HSGP).

**POLICY:**

EMPG subrecipients

Local emergency management agencies (EMAs) are required to maintain NIMS compliance to achieve accreditation, which is valid for two years. Maintaining NIMS compliance requires submission of the NIMS Implementation Assessment form by Sept. 30 in even-numbered years to be eligible for the next accreditation term. EMAs must be compliant prior to the accreditation cycle. The assessment form can be found on the IEMA website.

**Accredited EMAs are not required to submit additional NIMS documentation to receive EMPG funding.**

HSGP subrecipients

HSGP subrecipients must submit the NIMS Implementation Assessment form every two years to fulfill the NIMS compliance reporting requirement. The assessment form is due by Sept. 30 in even-numbered years and can be found on the IEMA website.

**Use of Federal Preparedness Funds for Educational Sessions**  
Effective: May 15, 2014

**Policy 1.3**

**PURPOSE:**

To clarify the allowable use of federal preparedness funds for educational sessions.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

Subrecipients are encouraged to select training courses that have been approved by the National Training and Education Division (NTED) and listed in the NTED Catalog or the NTED Approved State and Federal Sponsored Course Catalog. However, preparedness funds may be used to support delivery and attendance at other courses that are consistent with the Federal Emergency Management Agency mission scope, the Illinois Homeland Security Strategy and the jurisdiction's emergency operations plan.

The table attached to this policy statement delineates the various types of educational sessions by grant cost category, i.e., training, planning, equipment, exercises, and management and administration. Subrecipients should refer to the table to determine with which category each of their educational sessions aligns.

Subrecipients should refer to the applicable Notice of Funding Opportunity (NOFO) (<http://www.fema.gov/preparedness-non-disaster-grants>) for a listing of allowable training-related costs.

[Supersedes Policy Statement 2014 (2), May 15, 2014]

### Types of Educational Sessions (By Guidance Cost Category)

Category	Length	Test	Other Information
Training	<ul style="list-style-type: none"> <li>▪ 16 hours (two days) or more in length</li> <li>▪ Less than 16 hours if part of established list of courses necessary to obtain or maintain certification</li> </ul>	May require pre- and/or post-test	<ul style="list-style-type: none"> <li>▪ Established curriculum to fulfill federal/state standards</li> <li>▪ Prerequisite required to take course (e.g. NIMS training)</li> <li>▪ Static information contained in curriculum</li> <li>▪ Requirement to be part of a mobile support team</li> <li>▪ Courses from DHS Federal- and State-Sponsored Course Catalogs and NTED Catalog</li> <li>▪ Curriculum consistent with DHS mission statement and Illinois Homeland Security Strategy</li> </ul>
Planning	Less than 16 hours (two days) for a single session	None	<ul style="list-style-type: none"> <li>▪ Stand-alone curriculum (no required prerequisite)</li> <li>▪ Time-sensitive and/or dynamic information</li> <li>▪ Includes planning workshops, intelligence briefings, membership conferences, and advisory board/task force meetings</li> <li>▪ Approved definition from DHS: “Topics for the sessions vary based on the latest information from federal and state intelligence centers. The educational sessions are a forum to relay time-sensitive intelligence and other law enforcement information. The curriculum varies, and there are no prerequisites for participation. Sessions are scheduled upon request of local law enforcement agencies.”</li> </ul>

Equipment	No limitation on length of session	Pre- and/or post-test possible to attain certification on use of equipment	<ul style="list-style-type: none"> <li>▪ Instruction provided by vendor or local entity on a specific piece of CBRNE or cyber security equipment purchased with federal preparedness funds</li> <li>▪ Limited to instruction on use of equipment (e.g. donning and doffing a respirator), not the operational use of equipment during further training or in a scenario.</li> </ul>
Exercises	No limitation on length of session	Requires completion of all pre- and post-exercise reporting documentation required by HSEEP and IEMA	<ul style="list-style-type: none"> <li>▪ General, operational practice (validation) in the use of equipment.</li> <li>▪ Includes pre-exercise workshops, participant/controllers/evaluators briefings, and after action conferences.</li> </ul>
Management & Administration	No limitation on length of session	Pre- and/or Post-Test possible to attain certification for field of study	<ul style="list-style-type: none"> <li>▪ General instruction on management and administration of grant award, grant compliance, and programmatic and financial monitoring</li> <li>▪ Includes national and state workshops and conferences</li> <li>▪ May or may not have established curriculum to fulfill federal/state standards</li> <li>▪ May or may not have a prerequisite for other sessions or to attain certification</li> <li>▪ May be static, time-sensitive, and or dynamic information</li> </ul>
Examples of courses not eligible with DHS funds			<ul style="list-style-type: none"> <li>◆ Physical fitness requirement testing</li> <li>◆ Firearms skills qualification</li> </ul>

**Use of Federal Preparedness Funds for Maintenance**  
**Effective: May 10, 2013**

**Policy 1.4**

**PURPOSE:**

This policy statement outlines the maintenance costs that are allowable under federal preparedness grant programs based on guidance from the Federal Emergency Management Agency's Grant Programs Directorate (GPD) Information Bulletins No. 336 and No. 379, in addition to GPD Policy FP 205-402-125-1.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

Federal preparedness grant funds may be used for maintenance costs as outlined in this policy statement. Allowable project or program maintenance expenditures include those costs associated with:

- repair and replacement parts for DHS-authorized equipment purchased with previous federal preparedness grants or any other federal, state or local funding source
- upgrades to DHS-authorized equipment previously purchased with federal preparedness funds or other federal, state or local funding source
- maintenance agreements and warranties for DHS-authorized equipment purchased with federal preparedness funds or other federal, state or local funds, including equipment purchased with funds from a different federal fiscal year
- user fees (costs for specific services required to maintain and provide continued operation of equipment or systems) for DHS-authorized equipment purchased using preparedness grant funds or other federal, state or local funding source

With one limited exception, outlined below, the length or term of a maintenance agreement, warranty, license or user fee may not extend beyond the period of performance outlined in the fully executed grant agreement with IEMA. For example, a maintenance agreement purchased under a grant agreement with a performance period of April 1, 2013, to March 31, 2014, may not provide maintenance or warranty coverage beyond March 31, 2014.

The exception to this requirement is that if the maintenance contract, warranty, license or user fee is purchased at the same time or within 30 days of the original DHS-authorized equipment acquisition of the system or equipment, coverage may exceed the period of performance as long as the coverage is consistent with that which is typically provided through these types of agreements/contracts. Stand-alone warranties, or the extension of an existing maintenance contract on an already-owned piece of equipment, may not exceed the grant agreement performance period.

Examples of allowable project or program maintenance expenditures consistent with this policy include replacing vehicles that exceed a mileage of 120,000 or equipment that is older than seven years or has become obsolete according to industry standards; replacing expired products or

commodities; performing equipment calibration according to vendor recommendations; and renewing software licenses or performing system upgrades to ensure continued operation of an existing application.

[Previously Policy Statement 2014 (6), Aug. 27, 2014]

**Use of Grant Funds for Controlled Equipment**  
**Issued: Jan. 19, 2017**

**Policy 1.5**

**PURPOSE:**

To provide guidance regarding requirements for purchasing controlled equipment with federal preparedness funds.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds for grants awarded on or after Oct. 1, 2015 (i.e., FFY 2016 funds).

**POLICY:**

As part of the implementation of Executive Order 13688, which established a Prohibited Equipment List and a Controlled Equipment List, FEMA issued Information Bulletin No. 407 to set forth requirements and conditions for all controlled equipment expenditures using federal preparedness funds.

The Prohibited Equipment List identifies categories of equipment that subrecipients are prohibited from acquiring using federal funds, including the following:

- Tracked armored vehicles
- Weaponized aircraft, vessels and vehicles of any kind
- Firearms of .50-caliber or higher
- Ammunition of .50-caliber or higher
- Grenade launchers
- Bayonets
- Camouflage uniforms used for urban settings

The Controlled Equipment List identifies categories that recipients may continue to acquire; however, because of the nature of this equipment and the potential impact on communities, FEMA has imposed additional controls on the acquisition, use and transfer. Following are categories of allowable controlled equipment under the 2016 Homeland Security Grant Program:

- Manned aircraft, fixed wing
- Manned aircraft, rotary wing
- System, small unmanned aircraft
- Armored vehicles, wheeled
- Tactical vehicles, wheeled
- Command and control vehicles
- Breaching apparatus

Subrecipients should refer to the annual Notice of Funding Opportunity and Authorized Equipment List or contact IEMA for additional information regarding the allowability of specific equipment categories.

Subrecipients planning to purchase controlled equipment with federal funds must contact IEMA for information regarding requirements and conditions that must be met prior to acquisition.

## Section 2

# Program Implementation Management

**Environmental and Historic Preservation (EHP) Review Process**  
Effective: Oct. 1, 2004  
Updated: Jan. 10, 2017

Policy 2.1

**PURPOSE:**

To clarify the Environmental and Historic Preservation (EHP) review process for projects funded through federal preparedness funds.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

Subrecipients proposing projects that have the potential to impact the environment and/or historic properties must participate in the DHS/Federal Emergency Management Agency (FEMA) EHP review process. The EHP review process involves the submission of an EHP Screening Form, which includes a detailed project description explaining the goals and objectives of the proposed project along with supporting documentation, so that DHS/FEMA may determine whether the proposed project has the potential to impact environmental resources and/or historic properties. In some cases, DHS/FEMA is also required to consult with other regulatory agencies to complete the review process. Subrecipients submit EHP Screening Forms to IEMA, who forwards the forms to DHS/FEMA for review. **Any project with the potential to impact environmental resources or historic properties cannot be initiated until DHS/FEMA has completed an EHP review. DHS/FEMA will not fund projects that are initiated without the required EHP review. The subrecipient must comply with all conditions placed on the project as a result of the EHP review.**

Projects subject to the EHP review process include, but are not limited to, the following: communications towers; physical security enhancements; permanent installation of any type of equipment (regardless of funding source for installation); projects, including training and exercises, that disturb land or vegetation; new construction, renovation, repair, demolition or other modification of buildings; alteration of historically significant properties; and impact to threatened and endangered species, migratory birds and habitat. Any item on a subrecipient's approved Attachment A Budget Detail Worksheet that has a "yes" to EHP is subject to the EHP review process. FEMA's Authorized Equipment List (AEL) notates which pieces of equipment are subject to EHP review. The purchase of replacement parts for equipment that is already installed (and thus approved for EHP compliance) is not subject to EHP review. However, if the entire piece of equipment is being replaced, an EHP review is required.

Because the EHP review process can take anywhere from 30 working days to one year, depending on the complexity of the project and the potential for environmental or historical impact, subrecipients are urged to immediately notify IEMA if they suspect their project is subject to this review.

The Environmental and Historic Preservation Screening Form can be found here:

[http://www.fema.gov/media-library-data/1470078399293-c72fb603f99be4824dd3f975bb3d581c/EHPScreeningFormFillable\\_Jan\\_2014\\_v508\\_11Ext2.pdf](http://www.fema.gov/media-library-data/1470078399293-c72fb603f99be4824dd3f975bb3d581c/EHPScreeningFormFillable_Jan_2014_v508_11Ext2.pdf)

[Supersedes Policy Statement 2009 (9), Oct. 6, 2009]

**Use of Federal Preparedness Funds for Travel**  
**Effective: Aug. 27, 2014**

**Policy 2.2**

**PURPOSE:**

To outline allowable use of federal preparedness funds for travel expenses.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

It is the policy of the Illinois Emergency Management Agency (IEMA) to follow the Travel Guide for State Employees, as applicable, published by the Governor's Travel Control Board, for all travel conducted by the Illinois Terrorism Task Force (ITTF) or its representatives and subrecipients who seek reimbursement for expenses through federal preparedness grant funds.

**Travel Reimbursement Paid Directly by IEMA**

If a member of the ITTF or its committees or workgroups wishes to use federal preparedness funds retained by IEMA to pay for travel costs associated with attendance at a designated ITTF-meeting or other homeland security-related event, the following guidelines apply:

- Traveler must request in writing from the ITTF chair or his/her designee authorization to attend an ITTF meeting or other homeland security-related event prior to each event for which travel reimbursement is being sought. The authorization request must provide the purpose of the event, why attendance is critical to homeland security preparedness in Illinois, and approximate cost of travel. Traveler must provide documentation citing the cost of other comparable opportunities that address similar course objectives to justify attendance at any event with a registration fee exceeding \$500. This requirement for prior authorization is waived if the ITTF chair or his/her designee requests the traveler attend an event on behalf of the ITTF.
- Traveler is required to follow the guidelines and is limited to the travel reimbursement rates listed in the *Travel Guide for State Employees*, as applicable, published by the Governor's Travel Control Board.
- Travelers employed by the state of Illinois are responsible for adhering to their own agency's travel policy and procedures for requesting travel, including completion and submission of out-of-state travel requests. Travelers employed by the state of Illinois also are required to submit a completed state of Illinois Form C-10, signed by an authorizing official from their agency, in order to claim a travel reimbursement.
- To receive reimbursement for lodging, traveler must be attending an event that is more than 50 miles away from his or her residence.
- Travelers will not be reimbursed for ordinary commuting mileage expenses. Reimbursement for mileage will be in excess of a traveler's regular commuting mileage. All travel must be by the most direct route.

- Travelers employed by local government or other public sector or non-governmental organizations are required to submit a completed Travel Reimbursement Request-Non-State Employee Form in order to claim a travel reimbursement.
  - The Travel Reimbursement Request-Non-State Employee Form requires travelers to indicate the location of their headquarters (location where majority of work time is spent), location of their residence, and commuting mileage (distance from residence to headquarters). Commuting mileage must be deducted from any mileage claimed.
- For in-state conferences/workshops, travelers must submit with their completed travel reimbursement a summary of the workshop/conference, including purpose statement, goals/objectives and key outcomes (lessons learned). IEMA will not process reimbursements without the workshop/conference summary.
- Completed travel reimbursement form and all appropriate attachments, such as agendas, out-of-state travel approval, and appropriate receipts, must be submitted directly to IEMA for payment.
- Travelers will submit travel reimbursements to IEMA no later than 60 days after completion of travel or within 30 days after the completion of the appropriate grant performance period from which the reimbursement will be funded.

#### **Travel Reimbursement Paid by Subrecipient of IEMA**

If a representative of a subrecipient of IEMA wishes to use federal preparedness funds for travel, the following must occur:

Traveler is required to follow the guidelines and is limited to the travel reimbursement rates listed in the *Travel Guide for State Employees*, as applicable, published by the Governor's Travel Control Board, unless the subrecipient has developed policies and guidelines for travel that have been accepted by IEMA. These policies and guidelines cannot include rates that exceed those established by the Office of Management and Budget for federal employee travel. To be eligible for a different reimbursement rate, the subrecipient's local travel regulations must be submitted to IEMA at the time of grant application.

- If utilizing the local travel regulations, the following guidelines will apply regardless:
  - The purpose of travel must be in accordance with the grant agreement from which reimbursement will be paid and related to the implementation of homeland security-related activities and approved projects.
  - Traveler must provide documentation citing the cost of other comparable opportunities that address similar course objectives to justify attendance at any event with a registration fee exceeding \$500.
- If utilizing the *Travel Guide for State Employees* published by the Governor's Travel Control Board, the following guidelines apply:
  - The purpose of travel must be in accordance with the grant agreement from which reimbursement will be paid and related to the implementation of homeland security-related activities and approved projects.

- Traveler must provide documentation citing the cost of other comparable opportunities that address similar course objectives to justify attendance at any event with a registration fee exceeding \$500.
- To receive reimbursement for lodging, traveler must be attending an event that is more than 50 miles away from his or her residence or in an urban location where the commute between event site and residence would cause an undue travel burden. The traveler must be on approved travel status.
- Travelers will not be reimbursed for ordinary commuting mileage expenses. Reimbursement for mileage will be in excess of a traveler's regular commuting mileage. All travel must be by the most direct route.
- Traveler must complete the Travel Reimbursement Request-Non-State Employee Form Travel Reimbursement Form in order to claim a travel reimbursement. Subrecipients may develop their own travel reimbursement form as long as it provides at a minimum the same information requested in the Travel Reimbursement Request-Non-State Employee Form.
- The Travel Reimbursement Request-Non-State Employee Form requires travelers to indicate the location of their headquarters (location where majority of work time is spent), location of their residence, and commuting mileage (distance from residence to headquarters). Commuting mileage must be deducted from any mileage claimed.
- For in-state conferences/workshops, travelers must submit with their completed travel reimbursement a summary of the workshop/conference, including purpose statement, goals/objectives and key outcomes (lessons learned). IEMA will not process reimbursements without the workshop/conference summary.
- Subrecipient will submit travel reimbursements from the traveler to IEMA no later than 60 days after completion of travel or within 30 days after the completion of the appropriate grant performance period from which the reimbursement will be funded.

#### **Prior Approval for Out-of-State Travel**

All out-of-state travel with federal preparedness funds requires prior approval by IEMA. Requests should be submitted through the IEMA Grants Portal a minimum of 30 days prior to the intended dates of travel. The "Travel Request" form is located under the Forms and Information tab on the portal. The form includes name of traveler(s), destination, travel start date and end date, purpose of travel, why out-of-state travel is critical to Illinois' homeland security program, and estimated cost. Upon completion of travel, travelers must submit with their completed travel reimbursement a summary of the event, including purpose statement, goals/objectives and key outcomes (lessons learned). IEMA will not process reimbursements without the event summary.

#### **Prior Approval for International Travel**

Per the FEMA Notice of Funding Opportunity (NOFO), international travel is not an allowable cost under this program unless approved in advance by DHS/FEMA. To obtain approval, the FEMA Allowability Request Log (ARL) form will be provided to the traveler upon request to IEMA. Once the form is completed, IEMA will submit it to FEMA. Allow at least 60 days prior to travel dates to ensure adequate review.

[Supersedes Policy Statement 2014 (5), Aug. 27, 2014]

**Equipment Policy**  
**Effective Nov. 1, 2009**

**Policy 2.3**

**PURPOSE:**

To clarify the following requirements for equipment purchased with federal preparedness grant funds: property control, evidence of delivery and property identification numbers, automated central inventory system for property with manufacturer expiration date, and leasing or rental of storage space for equipment.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

**Property Control Requirements**

Subrecipients shall inventory, dispose of and manage equipment acquired with federal preparedness funds received through the Illinois Emergency Management Agency (IEMA) in accordance with this policy and applicable federal and state rules, regulations and policies. Subrecipients shall have adequate management systems in place for property control and disposition, regularly provide IEMA with reports on inventory in accordance with this policy and make equipment available for inspection as part of IEMA's ongoing subrecipient monitoring program.

Subrecipients that purchase equipment with federal preparedness funds must maintain a property control system consistent with the following:

1. State agency subrecipients will continue to follow state inventory policies and procedures as outlined in the State Property Control Act (30 ILCS 605) and applicable Administrative Rules.
2. In accordance with the waiver granted on July 28, 2006, by the Director of the Illinois Department of Central Management Services, non-state subrecipients will use the definition of equipment and inventory procedures in accordance with 2 CFR Part 200.

**Definition of Equipment**

Per 2 CFR Part 200, 200.33 Equipment, equipment is defined as any item with a usable life in excess of one year and a per-unit acquisition cost of \$5,000\* or more.

\*For state agencies, equipment is defined as having an acquisition cost of \$100 or more.

**Property with Manufacturer Expiration Date**

Subrecipients that receive more than \$500,000 in federal preparedness funds from IEMA in any federal fiscal year are required to have an automated central inventory system to identify property items with a stated manufacturer's expiration date. This information will provide first responders with advance notice of items with impending expiration dates. Examples include, but are not limited to, filtration canisters for self-contained breathing apparatuses, other personal protection equipment and medicines. The continued use of these items beyond the manufacturer's expiration date could be hazardous to users. IEMA requires that such property

be removed from the active inventory when the expiration date arrives or when the property's useful life is over.

### **Evidence of Delivery and Property Identification Numbers**

IEMA requires subrecipients to include affirmation or evidence of delivery and property identification numbers for equipment subject to policies and procedures as outlined in the State Property Control Act (30 ILCS 605) and 2 CFR Part 200, 200.33 Equipment at the time reimbursement is sought. The submission of documentation that verifies delivery and provides property control identification numbers in support of reimbursement requests adds credibility and authenticity to the requests and provides better oversight of subrecipients by IEMA. Such documentation also will facilitate verification of purchases and tracking of inventory records by IEMA and subrecipients. No reimbursements will be made to subrecipients for items that meet the definition of equipment without the following documentation:

- (1) Evidence or certification that the items have been received by the subrecipient from the vendor
- (2) Manufacturer serial number or other unique number assigned by the subrecipient for each item purchased

### **Leasing or Rental of Storage Space for Equipment**

State and local agencies in possession of allowable equipment purchased with federal preparedness funds may use existing and future federal preparedness grant funds to cover only that portion of the leasing/rental period that occurs during the grant performance period. Other applicable conditions and rules are listed below:

- If equipment purchased with federal preparedness funds is stored in the same facility as equipment purchased with non-federal funds, a reasonable estimate of the percentage of the facility used to store federal equipment should be determined. If equipment purchased with non-federal funds is utilized in a homeland security mission, this may be included in the percentage. Federal preparedness funds may be used to cover only that approximate portion of a lease or rental costs associated with the storage of equipment outlined here.
- Supplanting of previously planned or budgeted activities is strictly prohibited.
- State and local agencies must follow applicable state and local rules and regulations governing the establishment of contractual agreements.
- State and local government agencies are responsible for any lease or rental cost that is incurred outside of the grant performance period.
- State and local government agencies will ensure that appropriate security and fire suppression systems are in place to ensure proper storage and operational readiness of the equipment.

### **Property Control Documentation and Inventory Reporting**

A physical inventory of equipment acquired under federal awards will be made by the subrecipient no less than once every two years. Each subrecipient shall maintain complete and accurate property control records that contain the following information about the equipment:

1. Description (including serial number or other identification number)

2. Funding source
3. Entity in possession of the title/equipment
4. Acquisition date and cost
5. Percentage of federal participation in the cost
6. Location
7. Condition
8. Vendor/voucher number
9. Any ultimate disposition data, including the date of disposal and sales price or method used to determine current fair market value.

The inventory and reporting of equipment should occur whether or not the subrecipient has an open subgrant with IEMA. A list of equipment having met the definition of equipment outlined above must be submitted to IEMA no later than June 30 of odd-numbered years.

#### **Lost, Stolen or Damaged Equipment**

If equipment purchased with federal preparedness funds is lost, stolen or damaged, the subrecipient must notify IEMA within 30 days and provide an explanation of the circumstances that resulted in the event. If equipment is damaged, the subrecipient must include a plan for repair or replacement.

#### **Equipment Disposition**

IEMA has established the following disposition plan for equipment purchased with federal preparedness funds:

1. Equipment purchased with federal preparedness funds received through IEMA will be considered to have a usable life of seven years from date of acquisition. Powered vehicles will be considered to have a usable life of seven years or 120,000 miles, whichever comes first.
2. Subrecipients in possession of equipment purchased with federal preparedness funds may determine when the equipment is no longer usable for the intended purpose.
3. Depreciation shall be calculated in accordance with generally accepted accounting principles (GAAP) to determine the residual value of any equipment purchased with federal preparedness funds.

For the purposes of this policy, the term “transfer” is defined as the documented movement of equipment that has residual usable life between jurisdictions or organizations. The term “disposal” is defined as the surrendering of unusable equipment.

2 CFR Part 200, 200.436 Depreciation establishes that the period of useful service (useful life) for capital assets must take into consideration such factors as type of construction, nature of the equipment used, historical usage patterns, technological developments, and the renewal and replacement policies of the governmental unit for the individual items or classes of assets involved. Subrecipients are required to maintain proper records of the acquisition and management of equipment according to the standards set forth above.

Disposition of the equipment will be made as follows:

1. Subrecipients may relinquish the equipment when original or replacement equipment acquired through federal preparedness funds is no longer needed.
2. Subrecipients must notify IEMA when any item with a value of \$500 or more is to be discarded. If the subrecipient has no need for the property and the property has further useful value, the subrecipient shall request disposition instructions from IEMA.
3. Although federal rules allow items with a current per unit fair market value in excess of \$5,000 to be sold, IEMA will not approve the sale of any items purchased with federal preparedness funds except in very limited circumstances.
4. IEMA must be contacted to approve the disposition or transfer of the following equipment types regardless of price:
  - a) Cameras
  - b) Computers
  - c) Interoperable Communications Equipment
  - d) Night Vision Equipment
  - e) Any equipment that stores sensitive data, has high theft potential or would be of potential use in criminal or terrorist activity.

#### **Retention of Property Records**

Records for equipment, non-expendable personal property and real property shall be retained for a period of three years from the date of the disposition, replacement or transfer. If any litigation, claim or audit is started before the expiration of the three-year period, the records shall be retained until all litigations, claims or audit findings involving the records have been resolved.

[Previously 2009 (3), Sept. 2, 2009; 2009 (4), Sept. 1, 2009; 2009 (7), Sept. 16, 2009; and 2012 (2), May 22, 2012]

## Purchase of Vehicles/Storage, Maintenance and Use of CBRNE Response Vehicles

Effective: June 22, 2009

Updated: Jan. 10, 2017

Updated: Oct. 26, 2022

### Policy 2.4

#### **PURPOSE:**

To clarify the allowable use of federal preparedness funds to purchase vehicles and outline the responsibilities of subrecipients in possession of Chemical, Biological, Radiological, Nuclear and Explosive (CBRNE) response vehicles purchased with federal preparedness funding.

#### **SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

#### **POLICY:**

##### **Vehicle Purchase**

Federal preparedness funds distributed to subrecipients in Illinois by the Illinois Emergency Management Agency (IEMA) may be used to purchase prime mover vehicles under limited circumstances. For the purposes of this policy statement, “vehicle” refers only to a prime mover (tow) vehicle used to move equipment, as defined by the Federal Emergency Management Agency Preparedness Grants Authorized Equipment List (AEL). On the AEL, these tow vehicles are referred to as prime movers for equipment and defined as follows:

AEL Number: 12TR-00-MOVR

AEL Title: Mover, Prime, for Equipment/Water Trailers

Description: A vehicle used to tow equipment trailers, such as a semi-trailer tractor. It would be used with items such as the trailers in Items 12TR-00-TEQP [equipment trailer] and 12TR-00-H2OT [water source trailer].

Only in the following situations may federal preparedness funds be used to purchase vehicles:

- 1) The vehicle being purchased is to replace a vehicle purchased with federal preparedness funds that has reached a minimum mileage of 120,000 OR is at least seven years old; and/or
- 2) The vehicle being purchased will be used for operational response and will be immediately accessible for deployment.

An organization wishing to purchase a tow vehicle must request a waiver based on the previously mentioned criteria from IEMA prior to procurement.

The vehicle may not be assigned to a single individual without express written consent from IEMA unless the person is a member of a recognized response team on-call 24-hours. In cases where a vehicle is assigned to an individual, the use of the vehicle is limited to activities directly related to the response team. Use of the vehicle for personal activities is strictly prohibited. An organization in possession of a vehicle may request an exception to this provision through IEMA if the organization has an internal policy establishing provisions for the use of the vehicle on a 24-hour basis as operationally required for the response team.

The agency responsible for the vehicle assumes responsibility for licensing and registration fees and is prohibited from using federal preparedness funds to pay for these fees. In addition, the responsible agency must coordinate insurance coverage for the vehicle.

### **Responsibilities for Storage, Maintenance and Use of CBRNE Response Vehicles**

The terms and conditions outlined below have been the understood policy of IEMA regarding the storage, maintenance and use of CBRNE response vehicles acquired through federal preparedness funding. This policy does not replace or amend any existing agreement or similar accord relating to management of CBRNE vehicles created or recognized by IEMA.

The agency responsible for the CBRNE response vehicle agrees to:

1. Hold and safeguard the vehicle and make it available upon call for mutual aid and interagency regional emergency responses as requested by IEMA or other designated agency, including the Illinois Law Enforcement Alarm System, Mutual Aid Box Alarm System, Illinois Emergency Services Management Association, Illinois Public Health Mutual Aid system or county/municipal emergency management agency.
2. Use the vehicle for the transport of CBRNE terrorism response equipment and personnel to the incident site. General-purpose (non-emergency response) use of the CBRNE vehicle is prohibited other than as outlined within this policy statement. Federal guidance prohibits the use of CBRNE response vehicles for executive transportation. Item #3 below establishes the hierarchy of use for the CBRNE vehicles. Use of the vehicles for activities not listed in this policy must be approved by IEMA.
3. Follow the hierarchy of use policy as established by IEMA, generally defined as:
  - a. State and federally declared disasters
  - b. Local emergencies
  - c. Other agency emergencies pursuant to a mutual aid request
  - d. State training and exercises
  - e. Local training and exercises
  - f. Other agency mutual aid training and exercises
  - g. Vehicle maintenance and repair
4. Allow the vehicle to be operated only by 1) official, trained personnel who are employed by or designated a volunteer of the responsible jurisdiction, or 2) individuals who fall under an IEMA official mutual aid agreement, unless the vehicle has been transferred to another jurisdiction with the express prior consent of IEMA.
5. Conduct appropriate and effective preventative maintenance, keep the vehicle in good operating condition at all times, coordinate insurance coverage, and provide fuel and other preventative maintenance and all major repairs. Vehicle maintenance is an allowable expense under federal preparedness grant guidance if funding has been provided by IEMA to the responsible jurisdiction. Any maintenance performed must be part of an established maintenance contract.
6. Assume responsibility for licensing and registration fees. The responsible jurisdiction is prohibited from using federal preparedness funds for these fees.

7. Use and operate the vehicle in compliance with state law. In addition, the vehicle must not be operated in a negligent or reckless manner.
8. Not assign the vehicle to one person without expressed written consent from IEMA unless the person is a member of a recognized response team on-call 24-hours. In cases where vehicles are assigned to an individual, the use of those vehicles is limited to activities directly related to the response team. Use of the vehicles for personal activities is strictly prohibited. An organization in possession of a vehicle may request an exception to this provision through IEMA if the organization has an internal policy establishing provisions for the use of the vehicle on a 24-hour basis as operationally required for the response team.
9. Adhere to the vehicle marking guidance of the agency or organization operating said vehicle. Further, those vehicles issued pursuant to a memorandum of understanding (e.g., through ILEAS, MABAS, etc.) must also comply with the marking requirements set forth in the MOU. Vehicles covered under this policy shall not display the logos of the Illinois Terrorism Task Force (ITTF) or the Illinois Emergency Management Agency or their successors unless specific written permission has been obtained from the IEMA Director and/or Illinois Homeland Security Advisor. Vehicles with ITTF logos already applied when this policy revision was adopted on Oct. 26, 2022, will not be required to remove them. This revision applies to all newly purchased vehicles.
10. Make the vehicle available for inspection by a designated official of IEMA.
11. Not alter or modify the vehicle or communications equipment originally contained within in any significant manner, nor alter any operational capacity of the vehicle without the consent of IEMA. Additional CBRNE response equipment may be added to the vehicle, as operational needs require; however, safe gross vehicle weight shall be maintained. The agency in possession of the CBRNE response vehicle may at its own expense install additional audible and visual warning signals and communications equipment to allow the vehicle to communicate on local operating frequencies.

IEMA reserves the right to reassign a CBRNE response vehicle if it is determined that the jurisdiction in possession of the vehicle has not complied with the conditions outlined in this policy statement. The jurisdiction may, on its own initiative, relinquish the vehicle to IEMA at any time.

[Previously Policy Statements 2012 (4), June 6, 2012, and 2009 (2), June 22, 2009]

**Lunch Provided for Homeland Security Training, Exercise Sessions,  
Meetings or Conferences**  
Effective: May 28, 2014  
Updated: Jan. 10, 2017

Policy 2.5

**PURPOSE:**

To outline allowable use of federal preparedness funds to provide lunch at a training, exercise session, meeting or conference.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

The use of federal preparedness funds to provide lunch at training or exercise sessions, meetings or conferences that are eligible activities budgeted by a subrecipient under applicable federal preparedness grant guidelines is allowable if the cost of the lunch is considered to be reasonable, i.e. the cost of providing the lunch compares favorably to the costs incurred if it were not provided.

Anyone receiving per diem allowances or reimbursements who attends an event at which lunch is provided must deduct the allowance for the provided lunch from his/her per diem allowance as outlined in the State of Illinois, Governor's Travel Control Board, Travel Guide for State Employees ([http://www.illinois.gov/cms/Employees/travel/Documents/travelguide\\_FY2016.pdf](http://www.illinois.gov/cms/Employees/travel/Documents/travelguide_FY2016.pdf)).

**Eligibility Requirements and Procedure for Reimbursement of Lunch Expenses**

If a training session, meeting or conference is held involving management and administration, planning, training or exercise activities associated with the implementation of a federal preparedness grant-funded event, the following must occur in order for the subrecipient to receive reimbursement for the associated lunch expenditure:

- Subrecipient must ask IEMA for authorization via email or other written communication prior to the event for which the lunch reimbursement is being sought. The authorization request must provide the purpose of the event, approximate cost of the lunch(es) provided, and documentation that an analysis was conducted to determine that the benefit of providing the lunch outweighs the cost.
- Subrecipient must create a sign-in sheet listing the name of each person who is provided a lunch and create an agenda for the event. The sign-in sheet and agenda must be submitted along with the invoice for the lunches to IEMA at the time of the reimbursement request.
- The lunch rate per person shall not exceed \$8.00. If there are extenuating circumstances that would prevent a subrecipient from adhering to this rate, the subrecipient must request an exception in writing to IEMA prior to providing the lunch.
- Authorization of any meal other than lunch requires prior approval by IEMA.

[Supersedes Policy Statement 2014 (3), May 28, 2014]

**Milestone Contracts**  
**Effective: June 21, 2012**

**Policy 2.6**

**PURPOSE:**

To outline subrecipient requirements for projects completed through a milestone contract paid for with federal preparedness funds. For the purposes of this policy, a “milestone contract” is one in which the total amount to be billed is distributed over multiple billing dates as pre-determined “milestones” are reached.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

It is the policy of the Illinois Emergency Management Agency (IEMA), as the State Administrative Agency for U.S. Department of Homeland Security federal preparedness funds, to reimburse federal preparedness fund subrecipients for costs incurred over the course of a milestone contract only if certain conditions are met. This policy statement establishes the following subrecipient requirements for any project to be completed through a milestone contract paid for with federal preparedness funds.

- During the quarterly reporting process, subrecipients must identify which of their projects listed on the Budget Detail Worksheet (Attachment A) are to be completed through milestone contracts.
- Subrecipients must ensure that all milestones are defined and specified in the vendor’s contract, along with a schedule of payment upon the completion of each milestone.
- When a milestone is reached that includes equipment delivery and/or installation, the subrecipient must provide to IEMA a list of equipment and serial numbers, in accordance with Policy 2.3 (Equipment Policy), before costs will be reimbursed.

[Previously Policy Statement 2012 (5), June 21, 2012]

**Overtime and Backfill (OTB) Reimbursement and Volunteer Stipend**  
Effective: Nov. 1, 2007  
Updated: May 15, 2017

**Policy 2.7**

**PURPOSE:**

Policy Statement Regarding Overtime/Backfill Reimbursement and Volunteer Stipend

**SCOPE:**

This policy applies to subrecipients and sub-subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

As outlined in the Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO), overtime and backfill expenses are permitted under this grant in order to perform allowable HSGP planning, training, exercise and equipment activities. To be eligible for any form of personnel time reimbursements, the individual's employing department must have experienced an actual cost beyond normal operational personnel expenses. Qualified expenses may include overtime, backfill or loss of salary/compensation by the individual attending a grant eligible activity as outlined above.

**DEFINITIONS:**

**Overtime:** Expenses limited to the additional costs which result from personnel working over and above 40 hours of weekly work time as a direct result of their performance of DHS/Federal Emergency Management Agency (FEMA)-approved activities outlined in the NOFO. Overtime shall not exceed 1.5 times an individual's hourly wage.

**Backfill-related Overtime,** also known as "overtime as backfill": Expenses are limited to overtime costs that result from personnel who are working overtime (as identified above) to perform the duties of other personnel who are temporarily assigned to DHS/FEMA-approved activities outside their core responsibilities.

**Operational Overtime:** Operational overtime for activities related to specific events is allowable for increased security measures at critical infrastructure sites with prior approval from FEMA. These activities include backfill and overtime expenses for staffing state or major urban area fusion centers, hiring of contracted security for critical infrastructure sites, participation in Regional Resiliency Assessment Program activities, public safety overtime, and Title 32 or state Active Duty National Guard deployments to protect critical infrastructure sites, including all resources that are part of the standard National Guard deployment package. (Note: Consumable costs, such as fuel expenses, are not allowed except as part of the standard National Guard deployment package.)

**Planning:** Overtime for participation in a wide range of emergency preparedness and management planning activities, such as those associated with the development, review and revision of the THIRA, SPR, continuity of operations plans and other planning activities that support the Goal, placing an emphasis on updating and maintaining a current emergency operations plan that conforms to the guidelines outlined in CPG 101 v 2.0.

**Organization:** Overtime for information, investigative and intelligence sharing activities are eligible under the organizational category.

**Equipment:** Overtime resulting from participation in training related to the use and operation of the equipment acquired with DHS/FEMA.

**Training:** Overtime for participation in eligible training courses that are either state-sponsored or federal-sponsored (by DHS/FEMA or other federal agencies), coordinated and approved by IEMA, and fall within the DHS/FEMA mission scope to prevent, protect against, mitigate, respond to and recover from acts of terrorism or catastrophic events.

**Exercise:** Overtime for participation in eligible exercises that adhere to the Homeland Security Exercise Evaluation Program (HSEEP) standards and test the standards of a team or individual performing a grant-eligible activity.

Note that if overtime or backfill is charged against any of these cost categories and the event takes place out of state, the completion of a "Travel Request" form as outlined in Policy No. 2.2, *Use of Federal Preparedness Funds for Travel* is required. The form is required even if no travel is claimed as part of the grant program, but overtime or backfill is.

#### **POLICY APPLICATION:**

Costs charged to this award must be consistent with the Cost Principles for Federal Awards located at 2 C.F.R. Part 200, Subpart E. To that end, the costs must be allowable, allocable and reasonable. If overtime is claimed for the individual attending the event, backfill is not eligible. If backfill is claimed for the event, backfill will only be reimbursed for the hours needed to cover the shift of the event attendee. Organizations are encouraged, to the greatest extent possible, to modify activities to limit situations where overtime and backfill are necessary.

Overtime and backfill can be reimbursed for both full-time and part-time/volunteer emergency response personnel participating in DHS/FEMA-sponsored and approved training courses and exercises. With regard to training, the sponsoring department's employee must pass the course of study through an approved institution or provider that meets the course curriculum requirements of IEMA. Course rosters from the training provider must be submitted to the subrecipient to verify successful completion and must accompany reimbursement claims to IEMA. No reimbursement will be provided, including backfill, if an employee fails a course.

For statewide deployable teams, the course must be listed as part of the team curriculum requirements also on file with IEMA. For employees who serve as part of a statewide deployable team, only those personnel listed on a team roster at least six weeks prior to the start of the course are eligible to receive reimbursement or volunteer stipend.

Time spent during exercise play in accordance with the HSEEP standards will be eligible for overtime and backfill. A sign-in sheet recording the participation of the sponsoring department's employee must accompany reimbursement claims, along with the After Action Report.

Reimbursement and volunteer stipend may only be requested by and paid to the individual's employing or sponsoring department. Submission of a reimbursement or volunteer stipend claim by a sponsoring department will be submitted through the subrecipient with which IEMA has a contractual relationship. The required form must be used, and backup documentation verifying the hours and rate claimed must be attached to the form. For all career employees, payroll

printouts or check stubs verifying the rate and hours as submitted on the form are required. For volunteers, a time sheet recording these hours is sufficient backup documentation.

Reimbursement limitations include:

1. Only personnel time directly related to the grant activity is allowed. Travel time to and from the event is not eligible.
2. Normal salaried time of team members is not eligible for reimbursement due to supplanting issues.
3. Salaried employees participating outside their normal work hours are not eligible for reimbursement.

Reimbursement cannot exceed 1.5 times a sponsoring department employee's hourly wage. Benefits, longevity pay and other salary enhancements are not eligible for reimbursement. Should a subrecipient wish to develop a policy whereby the amount of reimbursement is capped at a particular rate, they can do so with prior written approval from IEMA.

For volunteer stipends, the rate shall be adjusted annually from the Independent Sector website specific to Illinois rates. The current rate for Illinois is designated at <https://www.independentsector.org/resources/the-value-of-volunteer-time/>

**Training Tuition Reimbursement**  
Effective: October 1, 2018

Policy 2.8

**PURPOSE:**

To clarify allowable use of federal preparedness funds for training tuition.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

It is the policy of the Illinois Emergency Management Agency (IEMA), as the State Administrative Agency for U.S. Department of Homeland Security federal preparedness funds, to reimburse federal preparedness fund subrecipients for tuition costs incurred for training workshops and conferences only if attendee(s) passed the training course.

**“Multiple-Purpose” Funds**  
Effective: April 15, 2016  
Updated: Jan. 10, 2017

**Policy 2.9**

**PURPOSE:**

To clarify the use of “Multiple-Purpose” funds from Title 6 U.S. Code § 609 (c).

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

**POLICY:**

According to the DHS Notice of Funding Opportunity, HSGP funds are intended primarily for terrorism-related missions. Title 6 U.S. Code § 609 (c), titled “multiple-purpose funds,” allows for grant funds to be used “in a manner that enhances preparedness for disasters unrelated to acts of terrorism if such use assists in achieving target capabilities related to preventing, preparing for, protecting against, or responding to acts of terrorism.”

**Equipment**

- Under the multiple-purpose funds allowance, HSGP fund recipients can utilize equipment that was originally purchased for terrorism-related missions for cascading disaster events that are not directly related to acts of terrorism.
- The purchase of equipment for sole use in natural disaster-related missions or for missions that are not part of the cascading events after an act of terrorism is not an eligible expense under HSGP.

**Personnel**

- The multiple-purpose funds allowance does not extend to personnel expenses. Personnel funded under HSGP must be exclusively utilized for terrorism preparedness purposes. It is, however, acceptable for such personnel’s work product to also be used for a purpose unrelated to terrorism, if applicable. For example, a terrorism communications plan could also be used for a tornado.
- A possible exception, pending approval by the grant manager on a case-by-case basis, is for planners acting in technical assistance roles under the following circumstances:
  - 1) Planners acting in technical assistance roles during a pre-planned event where an act of terrorism could reasonably be expected to occur may be an allowable expense if pre-authorized by IEMA and/or Federal Emergency Management Agency. To receive pre-authorization, the subrecipient must make a request in writing to IEMA.
  - 2) Planners who have been pre-authorized by IEMA and are acting in technical assistance roles at an event that is reasonably assumed to be terrorism related may be an allowable grant expense under HSGP or state funding source. Under this allowance, planners’ travel costs may also be an eligible expense.

**Use of Matching Funds**  
**Effective: Oct. 1, 2016**

**Policy 2.10**

**PURPOSE:**

To clarify the scope and eligibility of matching funds for federal grant programs that require a match.

**SCOPE:**

This policy applies to subrecipients of the U.S. Department of Homeland Security, the U.S. Department of Transportation and the U.S. Department of Commerce federal grant funds for which a match is required.

**POLICY:**

2 CFR Part 200.306, Cost Sharing or Matching, governs the eligibility of matching funds. A grant Notice of Funding Opportunity (NOFO) may require a subrecipient to match federal funds received under the grant program.

**Basic Guidelines to Apply Match**

Any shared costs or matching funds and all contributions, including cash and third party in-kind contributions, must be accepted as cost sharing or match when all of the following criteria are met:

1. Are verifiable from the non-federal entity's records. The records for the item are kept in the same manner as those for those items that are charged to the grant program.
2. Are not included as contributions for any other federal grant. To avoid duplication of contribution, the item cannot be listed or claimed, in part or in whole, under any other federal grant.
3. Are necessary and reasonable for accomplishment of project or program objectives.
4. Are provided for in the approved budget. For costs to be eligible to meet matching requirements, the costs must first be allowable under the grant program. Refer to grant eligible activities in the NOFO for further details.

**Allowable Cost Share and Match Activities**

Values for contributions of services and property must be established in accordance with cost principles under Subpart E-Cost principles.

- Volunteer services are permitted for cost share or match if the service provided is an allowable activity. Rates for volunteer services, including salary and fringe benefits, must be consistent with those paid by subrecipient for similar work. In those instances where the required skills are not found in the subrecipient entity, rates must be consistent with those paid for similar work in the labor market in the area. A third option for determining hourly rates is to utilize the Bureau of Labor Statistics: Occupational Employment Statistics- [http://www.bls.gov/oes/current/oes\\_il.htm](http://www.bls.gov/oes/current/oes_il.htm). Rates must be verified by the subrecipient at the time of grant application.

- Indirect costs are permitted for cost share or match if the entity has prior approval from a federal cognizant agency or through the Governor's Office of Management and Budget Grant Accountability and Transparency Unit.
- Contributions of services and property are permitted for cost share or match as long as the subrecipient can determine a documented value of the service or donated property. Subrecipients are encouraged to utilize the established Federal Emergency Management Agency Schedule for Equipment Rates where applicable.

#### **Reimbursement Procedures for Match**

Matching funds may be applied at any time throughout the performance period of the grant. However, if the grant performance period ends without the federal funds having the appropriate level of match required, IEMA will invoke the remedies set forth in the Illinois Grant Funds Recovery Act and require the subrecipient to repay the federal share of the grant in excess of the match provided and verified.

**IEMA Inter-Grant Adjustments Policy for HSGP Grants**  
Effective: Nov. 1, 2021

**Policy 2.11**

**PURPOSE:**

To clarify specific circumstances under which subaward recipients may request changes within and between state and federal grants during the grant performance period and to provide guidelines governing the approval process for these changes.

**SCOPE/BACKGROUND:**

This policy applies to all state and federal grants recommended by and within the scope of the Illinois Terrorism Task Force (ITTF). The ITTF recommends to the Governor's Homeland Security Advisor (HSA)/Illinois Emergency Management Agency (IEMA) Director the scope, purpose and size of various state and federal homeland security grants. Once the HSA determines the subaward recipients and structure of the grants, the Preparedness Section of the IEMA Preparedness and Grants Administration Division directs the issuance, implementation and oversight of the grants.

During a grant's performance period, it may become necessary to make changes to the grant. These changes include, but are not limited to, the following:

- Change to the purpose of a grant
- Change in the amount of a grant
- Modification of line items within a grant
- Movement of funds from one grant to another within the grant award of a single subaward recipient

**POLICY/PROCESS:**

**Change to the purpose of a grant**

If a subaward recipient wants to change the purpose of a grant, it shall seek and receive approval from the full ITTF. After ITTF approval, the subaward recipient shall complete the appropriate documentation with the IEMA Preparedness Section for its approval, as well.

**Change in the amount of a grant**

The IEMA Preparedness Section may increase or decrease any grant in concurrence with the subaward recipient for amounts under \$250,000. For amounts \$250,000 and over, the ITTF Council of Chairs must approve the change.

**Modification of line items within a single grant**

Upon obtaining approval from the IEMA Preparedness Section and completing the required IEMA documentation, subaward recipients may move funds between line items within a single grant as long as the adjustment does not change the nature and purpose of the grant.

**Movement of funds between grants**

The IEMA Preparedness Section may transfer funds between grants in concurrence with the subaward recipient for amounts under \$250,000 as long as the transfer does not change the nature and purpose of either grant. Inter-grant transfers of \$250,000 or more must be approved by the ITTF Council of Chairs.

**Use of Illinois Terrorism Task Force (ITTF) logo**  
Effective: Oct. 26, 2022

**Policy 2.12**

**PURPOSE:**

To clarify circumstances under which the ITTF logo may be used.

**POLICY:**

Use of the adopted logo for the Illinois Terrorism Task Force (ITTF) is prohibited unless written permission has been granted by the Illinois Homeland Security Advisor after a recommendation by the ITTF Council of Chairs. Use of the logo should be limited to official authorized purposes only.

## Section 3 Post-award Phase

## Submission of Reimbursement Requests and Overpayment to Subrecipients

Effective: Nov. 16, 2009

Updated: Jan. 10, 2017

Policy 3.1

### PURPOSE:

To set a deadline and requirements for the submission of requests for reimbursement of expenses and outline the process in the case of overpayment to subrecipients.

### SCOPE:

This policy applies to subrecipients of Department of Homeland Security (DHS), Department of Transportation and Department of Commerce federal preparedness funds.

### POLICY:

#### Reimbursement Requests

Homeland Security Grant Program (HSGP), Nonprofit Security Grant Program (NSGP), and State and Local Implementation Grant Program (SLIGP)

All requests for reimbursement of HSGP, NSGP and SLIGP funds administered by the Illinois Emergency Management Agency (IEMA) must be submitted to IEMA, located at 2200 South Dirksen Parkway, Springfield, Illinois, no later than 60 days after the expense was incurred or the date on the invoice. In addition to a formalized request, each expense for which reimbursement is sought must have a vendor invoice attached to prove the claimed expense. The invoice must include a clear, detailed description of the expense. A checklist of additional required documentation, according to the type of project expense, is attached to this policy. Failure to submit a timely invoice or additional documentation may result in the reimbursement request being denied.

Emergency Management Performance Grant (EMPG) and Hazardous Materials Emergency Preparedness (HMEP) grants

All requests for reimbursement of EMPG and HMEP funds administered by IEMA must be submitted via the IEMA Grants Management System (GMS) no later than 30 days following the end of the reporting quarter. All required forms must be completed and submitted, and backup documentation proving the claimed expense, such as payroll submissions and vendor invoices, are required by this date. A checklist of required documentation, according to the type of project expense, is attached to this policy.

#### Overpayment to Subrecipients

If IEMA or a subrecipient determines there has been an overpayment of federal preparedness funds, duplicate payment, or any other instance in which the subrecipient has received funds that are not associated with an authorized expenditure, this amount must be returned to IEMA. Any interest earned on the overpayment in excess of the maximum that may be retained shall be remitted to the U.S. Treasury according to federal rules and regulations.

Upon discovering an overpayment of federal preparedness funds, duplicate payment, or any other instance in which funds are owed back, subrecipients must immediately notify IEMA in writing. Likewise, if an overpayment is discovered by IEMA, IEMA will immediately notify the subrecipient. In either case, the subrecipient must return the overpayment as soon as practicable to IEMA to limit the amount of interest lost by the federal government as a result of the

overpayment. If the subrecipient has overpaid a vendor, the subrecipient must take immediate action to recover the overpayment and, upon receipt, promptly return the funds to IEMA.

If the subgrant in which the overpayment occurred is still open, IEMA will work with the subrecipient to deduct the difference from the next billing unless interest would have been lost. If the subgrant in which the overpayment occurred is closed, the subrecipient must follow the guidelines described below:

- A separate check should be remitted to IEMA for each grant for which an overpayment has been identified.
- Checks must be made payable to the Illinois Emergency Management Agency.
- A cover letter should be included with each check identifying which grant is involved and the circumstances of the repayment.
- The check and cover letter should be mailed to the attention of the appropriate grant manager, Illinois Emergency Management Agency, 2200 S. Dirksen Parkway, Springfield, Illinois 62703.

Once received by IEMA, the overpayment will be returned to the U.S. Department of Homeland Security on the subrecipient's behalf if the grant award is closed. If the grant award is open, IEMA will work to reallocate the funds elsewhere in the approved budget for the grant program.

## Checklist of Additional Documentation Required for Reimbursement

### Equipment (see IEMA Federal Grant Programs Policy 2.3 for further information)

Reimbursement requests for items with a per-unit acquisition cost of \$5,000 or more require the following backup documentation:

- Evidence or certification that the items have been received by the subrecipient from the vendor (e.g. packing slip)
- Manufacturer serial number or other unique number assigned by the subrecipient for each item purchased

Regardless of cost, if an item is categorized as equipment on the Attachment A-Budget Detail Worksheet, the Authorized Equipment List (AEL) number must be included on the vendor invoice.

### Lunch (see IEMA Federal Grant Programs Policy 2.5 for further information)

The following documentation must be submitted with the reimbursement request for lunch:

- Documentation verifying that prior approval was obtained for lunch expenses.
- Sign-in sheet listing the name of each person who is provided a lunch.
- Agenda for the event.

### Overtime and Backfill/Volunteer Stipend (see IEMA Federal Grant Programs Policy 2.7 for further information)

The following documentation must be submitted for reimbursement:

- Reimbursement and volunteer stipend claim forms that include backup documentation verifying the hours and rate claimed. For all career employees, payroll printouts or check stubs verifying the rate and hours are required. For volunteers, a time sheet recording these hours is sufficient backup documentation.
- Course rosters from the training provider verifying successful completion.
- For exercise play, a sign-in sheet recording the participation of the sponsoring department's employee and an After Action Report.

### Single Procurements Greater than \$150,000

Reimbursement claims for any single procurement from one vendor that is greater than \$150,000 must include a "bid tab sheet" along with invoice.

### Travel (see IEMA Federal Grant Programs Policy 2.2 for further information)

- Travelers employed by local government or other public sector or non-governmental organizations are required to submit a completed Travel Reimbursement Request-Non-State Employee Form in order to claim a travel reimbursement. Subrecipients may develop their own travel reimbursement form as long as it provides at a minimum the

same information requested in the Travel Reimbursement Request-Non-State Employee Form.

- Travelers employed by the state of Illinois are responsible for adhering to their own agency's travel policy and procedures for requesting travel, including completion and submission of out-of-state travel requests. Travelers employed by the state of Illinois also are required to submit a completed state of Illinois Form C-10, signed by an authorizing official from their agency, in order to claim a travel reimbursement.
- For in-state conferences/workshops and all out-of-state travel, travelers must submit a summary of the event, including purpose statement, goals/objectives and key outcomes (lessons learned).
- Also include other appropriate attachments, such as agendas, documentation verifying that prior approval was obtained for out-of-state travel, and receipts.

#### **Items with Defined Dates of Service**

Reimbursement requests for maintenance contracts, warranties, software subscriptions or anything else with defined dates of service must include a detailed description of services and clearly specified dates of service on the vendor invoice.

#### **Proration among Grants**

If a subrecipient is prorating an invoice between two or more grants, the proration calculation must be clearly indicated on the vendor invoice.

#### **Items subject to Environmental and Historic Preservation (EHP) Review**

Reimbursement requests for items that are subject to the EHP review process must include the date of EHP approval and the FEMA EHP case number on the vendor invoice.

## Federal Reporting Requirements and Grant Closeout Procedures

Effective: Jan. 12, 2015

Updated: Jan. 19, 2017

### Policy 3.2

#### **PURPOSE:**

To outline federal reporting requirements and grant closeout procedures for federal preparedness grant programs.

#### **SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS) federal preparedness funds.

#### **POLICY:**

##### **Required Documents**

The following required federal preparedness fund subrecipient documents must be submitted to the Illinois Emergency Management Agency (IEMA) by the deadline stipulated for each. Failure of a subrecipient to submit required documents will be considered non-compliance with the terms of the grant or inter-agency agreement.

##### Attachment A

Subrecipients must submit an initial Attachment A, with all tabs completed, for each grant or inter-agency agreement prior to the issuance of the grant agreement.

The Attachment A-Budget Detail Worksheet tab describes the expenditures for which the subrecipient will seek reimbursement. Only those activities specifically listed on this attachment will be reimbursed. In addition to submitting an initial Attachment A for each grant or inter-agency agreement prior to the issuance of the grant agreement, subrecipients must submit a revised Attachment A if a revision is made to the grant budget at any time during the grant period. A final Attachment A detailing exact expenditures under the grant is due within 30 days of the expiration of the grant agreement.

The Attachment A-Project Implementation Worksheet tab provides a detailed description of the scope of work to be performed using funds received through the grant agreement, including a list of specific sequential milestones to be achieved throughout the project. If at any time during the grant period a revision is made to the grant budget outlined in the Attachment A-Budget Detail Worksheet tab, a revised Attachment A-Project Implementation Worksheet must also be submitted. An updated Attachment A-Project Implementation Worksheet detailing the activities completed is due quarterly throughout the stated performance period (within 15 days after March 31, June 30, Sept. 30, and Dec. 31). A final Attachment A-Project Implementation Worksheet is due within 30 days of the expiration of the grant agreement.

##### Discipline Allocation Report

This report outlines the discipline-specific budget allocation classification for the activities listed in the Attachment A-Project Implementation Worksheet. Throughout the stated performance period of the grant or inter-agency agreement, subrecipients must submit, upon written request by IEMA, a current Discipline Allocation Report by Jan. 15 (covering the period

of July 1 to Dec. 31) and July 15 (covering the period of Jan. 1 to June 30). A final Discipline Allocation Report is due within 30 days of the expiration of the grant agreement.

### Grant Closeout

If a subrecipient needs additional time to complete programmatic activity outlined in the approved grant agreement, the subrecipient must request a performance period extension by completing a Grant Activity Request form, located on the IEMA Grants Management System (GMS) portal, before the end of the state grant performance period. If approved, IEMA will issue a Grant Adjustment Notice to provide additional time to complete the programmatic work.

In addition, the subrecipient should immediately notify IEMA in writing prior to the end of the expiration of the grant agreement if either or both of the following situations exist:

- All programmatic activities have been completed and any obligated and/or unexpended funds remain (if so, an estimate of the balance must be included); and/or
- All programmatic activities have been completed, but additional time is needed to obtain final invoices from the vendor.

If funding remains at the end of a subgrant, subrecipients must submit a final Grant Activity Request form and updated Attachment A to explain the reason for the remaining funding and to receive their final Grant Adjustment Notice to close the grant.

IEMA reserves the right to redirect, in accordance with program guidance, all funds that remain unexpended 30 days after the expiration of the grant agreement unless notified in writing that either/both of the above situations exist.

[Supersedes Policy Statement 2015 (1), Jan. 12, 2015]

**Subrecipient Monitoring**  
Effective: May 22, 2012  
Updated: Jan. 10, 2017

**Policy 3.3**

**PURPOSE:**

To outline the Illinois Emergency Management Agency's (IEMA) subrecipient monitoring plan as the pass-through entity for federal preparedness funds.

**SCOPE:**

This policy applies to subrecipients of Department of Homeland Security (DHS), Department of Transportation (DOT), and Department of Commerce (DOC) federal preparedness funds.

**POLICY:**

IEMA requires subrecipients to have adequate management systems to ensure that project objectives are met and funds are spent and accounted for properly. To the extent possible, financial assistance award monitors rely on the management systems of subrecipients to meet project objectives, comply with award terms and conditions, and account for funds. As outlined in Homeland Security Grant Program (HSGP) Notice of Funding Opportunity (NOFO), the Urban Area Working Group is responsible for coordinating the development and implementation of all program initiatives in the defined Urban Area.

To ensure subrecipients achieve programmatic objectives administered by IEMA and to ensure conformance with federal NOFO, applicable state requirements, policies, and terms and conditions of the grant agreement or interagency agreement, IEMA has established the following three-part subrecipient monitoring plan.

**IEMA Federal Preparedness Grants Subrecipient Monitoring Plan**

1. Regular Contact: Regular contact with subrecipients and appropriate inquiries concerning program activities.

- a. Contact Information of Authorized Representative for Subrecipient

- Each subrecipient is required to provide IEMA with detailed contact information for its authorized representative. This information includes the individual's name, title, mailing address, phone number, fax number and email address. The subrecipient is required to update this information as changes occur.

- b. Ongoing Technical Assistance and Communication

- The IEMA program manager or his/her designee for each federal preparedness grant regularly provides technical support and guidance to subrecipients via telephone, email, on-site visits and/or participation in subrecipient conferences/organizational meetings to ensure compliance with federal and state programmatic requirements. The IEMA program manager or his/her designee will have more frequent contact with subrecipients if it is determined there may be a problem with their compliance with the terms of the grant agreement or interagency agreement (legal obligation between IEMA and subrecipient).

- c. Pre-reimbursement Review

IEMA generally provides funds to subrecipients on a reimbursement basis. This means the subrecipient must have already incurred the expense and submitted to IEMA proper documentation (complete vendor invoice), which is immediately audited for adherence to federal and state rules and regulations that govern the grant program, before any funds are drawn from the U.S. Treasury and payment issued. Any deviation from the reimbursement protocol will be conducted on a limited basis in accordance with 2 CFR 200 Subpart D. The IEMA program manager or his/her designee completes a review process comparing the reimbursement claim to the approved grant application to ensure compliance. Pre-reimbursement review is also conducted at the invoice vouchering level and at the IEMA Bureau of Fiscal Management prior to the disbursement of federal funds.

2. Reporting: Reviewing financial and performance reports submitted by the subrecipient.

a. Submission of Quarterly Reports

IEMA's preparedness grant programs require a quarterly reporting component. Quarterly reporting is intended to provide the agency a programmatic performance report that aids in the periodic monitoring of projects.

b. Submission of Biannual Strategy Implementation Report (BSIR)

Upon request throughout the stated performance period in the HSGP, subrecipients will submit to IEMA documentation to support the submission of BSIR. The documentation must include, at a minimum, the amount of funding received, obligated and expended for activities outlined in the Scope of Work, Discipline Allocation Worksheet, and Project Metric Worksheet.

c. Review of Single Audits

IEMA will ensure that subrecipients are in compliance with the audit requirements as set forth in 2 CFR 200 Subpart F for subrecipients of federal preparedness funds through IEMA. 2 CFR 200 Subpart F requires that any state or local government or not-for-profit agency that expends more than \$750,000 from federal sources must have a single audit completed by an independent auditing firm. The IEMA grant agreement or interagency agreement states that the funds received are federal and that the requirements of 2 CFR 200 Subpart F apply. Correspondence will be sent by IEMA to subrecipients that fail to comply with submission deadlines. IEMA will ensure that subrecipients have adequately resolved any audit findings related to IEMA funding in accordance with federal and state requirements.

3. Programmatic Reviews

Throughout the period of performance, IEMA will conduct additional internal spot programmatic reviews of all documentation submitted to ensure the subrecipient is complying with the terms of the grant agreement or interagency agreement.

4. On-site Visits

Staff designated by IEMA may conduct on-site visits as necessary to ensure the accuracy of the documentation submitted. Subrecipients are required to maintain proper records on the acquisition and management of property that meets the definition established in the current IEMA policy regarding equipment purchased with federal funds. On-site

visits may include review of financial and programmatic records. On-site visits will be conducted for those subrecipients that have been evaluated as higher risk by IEMA.

### **Methodology for Selection of Subrecipients for Monitoring**

According to 2 CFR Part 200, Subpart D-Post Federal Award Requirements, pass-through entities such as IEMA must evaluate each subrecipient's risk of noncompliance with federal statutes, regulations, and terms and conditions of the subaward and monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes and that performance goals are achieved.

Each subrecipient will be evaluated at the conclusion of the state fiscal year, or June 30. The evaluation protocol has been established and is attached to the policy. Subrecipients will be defined as one of the following:

1. Low Risk: Low risk rated subrecipients will be monitored through steps 1 and 2 listed above.
2. Medium Risk: Medium risk rated subrecipients will be monitored through steps 1, 2 and 3 listed above.
3. High Risk: High risk subrecipients will be monitored through steps 1, 2, 3 and 4.

Once the list of subrecipients to be monitored is established, a subrecipient monitoring schedule will be developed. The schedule will include the jurisdiction, month of the on-site monitoring visit if necessary, and the type of monitoring to be performed.

## IEMA PGA Federal Preparedness Funds Subrecipient Risk Assessment

Subrecipient Name

Obligation Name(s)


**Experience Managing Preparedness Grants**

Three (3) or more subawards - 1  
Two (2) subawards - 2  
One (1) subaward - 3  
No subawards - 4

Preparedness Grant Experience

**Results of Previous Audits and/or Monitoring related to Preparedness Grants**

No significant findings - 1  
Some minor findings - 2  
Some moderate findings - 3  
Significant findings - 4

Previous Audits

**Changes in Personnel and/or Systems**

No significant changes - 1  
Some minor changes - 2  
Some moderate changes - 3  
Significant changes - 4

Changes in Personnel/Systems

**Amount Expended in Preparedness Funds in the Prior State Fiscal Year**

Less than \$100,000 - 1  
Between \$100,001-\$749,999 - 2  
\$750,000-\$3,000,000 - 3  
\$3,000,000 or more- 4

Prior Monitoring

**Total Score and Risk Level**

4-7 Low Risk  
8-12 Medium Risk  
13-16 High Risk

Total Score

Risk Level

Completed by

Completed Date