

Section	Comment	Response
1.1, 18.1	Unique Entity Identifier replaces DUNS in December 2020	Change made. Added UEI to Definitions (3.1), 1.1, 2.5 and 18.1
	Reference at the end is to old Rule placement. Change it to See 44 Ill. Admin. Code 7000.40(b)(1)	Change made. The correct reference is 44 Ill. Admin Code 7000.40(c)(1)(A).
2.4	Requirement is not applicable to sub-grantees	Change made to remove sub-grantees
2.5	Grantees need to submit in 15 days to allow compliance at the state level, which is 30 days	Change made for timely billing to 15 days
4.6	Interest earned on bond funded awards should be used for capital expenditures or returned to the State (and not spent on unrelated administrative costs).	No change made. Part Two or Three should specify how interest should be treated (see 4.6(a)).
Article 6	Line item transfers to be limited 10% of total grant award, and/or not to exceed \$50,000. Over threshold require budget modification/revision and approval from awarding agency	No change made. There is a notion to make this change, but it is currently in rule and the document must be in compliance with the rule, so the rule needs to change first.
6.2 & 6.3	Change reference in first sentence from 2 CFR 200.308 to 44 Ill. Admin. Code 7000.370(b).	Change made. The cite to Ill. Admin. Code is in addition to federal regulations, though.
7.2c	This is a lot of work for grantees that have sub-grantees because the terms follow through to subs. Isn't the letter sufficient? Doesn't it state the basis?	No change made. The letter lists the Indirect Cost Rate only.
7.2c	Cost Rate acceptance letters and all documentation regarding the allocation methodology used to negotiate that rate (Cost Policy Statement) shall be provided to Grantors by way of upload to the State Indirect Cost Rate System. This alleviates the burden of Grantees having to provide said documents to every granting program. Add certification for Illinois Works Review 8 Panel	No change made. Grantees already have to upload the information (and only once).
13.1	Change from 30 to 15, so the State will have time to complete and report	Change made by adding 8.1(u). Change made. Now Part Two or Part Three must specify reporting timelines

13.2a	Change the close out date from 60 days to 30 calendar days so the State will have time to complete and report	Change made. Now Part Two or Part Three must specify reporting timelines
	Move the CYEFR to the audit section because it is an audit requirement	Change made to move CYEFR to Audit Article, and moved to before other audits because it is completed before others (and fixed other reference based on the move)
13.3	13.3 was written as a “catch all” to cover a situation that we may not even know of, i.e. a situation where an audit is not required. What if we put the caveat on there, something like: pursuant to a federal or state statute or Rule? Would that be ok?	Change made. This Paragraph 13.3 applies to all Grantees, unless exempted pursuant to a federal or state statute or regulation, which is identified in PART TWO or PART THREE.
13.3a	13.3(b), 13.4 (fix last reference) (formatting issue)	Change made.
13.3b & 13.4	13.4: fix third cross reference (formatting issue)	Change made.
14.1 & 14.2	14.1 & 14.2: remove underline of Rule Change the close out date from 60 days to 30 calendar days, so the State will have time to complete and report	Change made. Change made. Change made. Now Part Two or Part Three must specify reporting timelines
14.1 & 14.2		
13.3 (new 15.2)	Remove June 30th reference because it is not correct	Change made to remove June 30 (period is based on grantee's fiscal year, not the State's)
17.3	Grantee believes this is fundamentally unfair. The word “misspent” is over broad. What if we changed it to “fraudulent.” The concern is that the State could come in at any time, say years later, and determine something was “misspent.” What is the difference between having this Paragraph here and sub-granting ourselves? Check case law to see if it was about a fraudulent transaction. But, is this basically for federal grants, the feds can do this to the State? How about must use “reasonable efforts” to ensure compliance, or liability will attach. Also add a reference to the GATA rules and federal rules. Add reference to 2 CFR 200.344. Maybe also add reference to 7000.450(a)?	Change made, but "misspent" is the word used in the Grant Funds Recover Act. References added.

Reference to 7000.40(b)(3) is incorrect, maybe change it to 30 ILCS 708/35 and 7000.330(f)(1)? Is there any other Code cite?

21.1 Is reference to 2 CFR 200 correct?

Change made. Change to 708/35.

Modify the Precedence language to account for exceptions.

26.12 Change made, so that precedence is correct when other rules than the Uniform Guidance applies, and added definitions. This change does not change the requirement that all deviations from the Uniform Guidance must be granted by GAT-U and recorded in the CSFA.

26.12

fix auto-cross-references in 3 places (formatting issue)

26.18c

Change made.

General

General: Develop a statewide amendment document

U-IGA only (it's correct in the UGA): Section 4.2 of the U-IGA, delete sentence: All obligations regarding Grant Funds management shall survive this Agreement's termination or expiration. See 2 CFR 200.343(d); 2 CFR 200.305(b)(9); 30 ILCS 705/5. This is because 26.18 covers this idea.

U-IGA

Change made.