



Illinois Law Enforcement Training and Standards Board

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FY 25 – ILETSB CAMERA GRANT **Policies & Procedures**

The Camera Grant Program offers grants to Illinois police agencies of municipalities, counties, park districts, public universities, and all units of Illinois local governmental for the purpose of purchasing or leasing of in-car video cameras for use in law enforcement vehicles; officer-worn body cameras for law enforcement officers, data storage costs related to officer-worn cameras, and training for law enforcement officers in the operation of the cameras.

The acquirer of equipment and the operation of an agency camera program has grown into a significant cost for many police departments. For this reason, Illinois Law Enforcement and Training Board (ILETSB) intends to offer these grants as advance payment, reimbursement, and working capital advance opportunities, when qualified. The following policies and procedures shall govern the implementation of this program.

General Policies:

- A. Grantees may request payment by advance funding, reimbursement, or working capital advance payment from the ILETSB Camera Grant Program. Grantees may request advance payment by notifying their Grant Program Manager or their designee and providing an ILETSB Advance Payment Request Form. If a Grantee has more than one grant from ILETSB, a separate request must be submitted for each grant. Requests must be signed by either the Grantees' Chief Executive Officer or Chief Financial Officer (or equivalent). ILETSB will then determine whether the Grantee meets the requirements in 2 CFR 200.302 (Financial Management) and 44 Ill. Admin. Code 7000.120(b)(i)(A) (Advance Payments). ILETSB will provide that determination in writing to the Grantee after the award.
- B. The timing and amount of the advance payment, reimbursement, or working capital advance payment request must be as close as is administratively feasible to the actual disbursements by the Grantee for direct program or project cost. Additionally, the Grantee entity must make timely payment to providers and contractors.
- C. Grantees must submit Periodic Financial Reports (PFR), invoices and appropriate supporting documentation in the format and method prescribed in the executed Uniform Grant Agreement. The first PFR is due after the first month of grant execution date. Invoices and appropriate supporting documentation are due based upon the schedule identified below. PFRs, invoices and appropriate supporting documentation must include only allowable incurred costs that have been paid by the Grantee.
- D. Subsequent monthly payments will be based on each monthly PFR submitted to the Grant Program Manager or their designee; and will be adjusted up or down, based on a comparison of actual cumulative expenditures to cumulative advance payments, to date.

E. Allowable Costs and Supporting Documentation:

1. Expenditures reported on the PFR must represent allowable expenditures incurred and paid for the grant and must be supported by appropriate documentation. If Grantee is unsure whether an expenditure is allowable, review the approved Grantee budget and/or consult with the respective Grant Program Manager or their designee.
 - a) Grantee is responsible for maintaining appropriate supporting documentation onsite in accordance with the conditions of the grant agreement.
 - b) Grantee shall submit supporting documentation to the Grant Program Manager or their designee for designated months of review.
 - c) ILETSB shall review supporting documentation upon receipt. Grantee need only submit documentation for costs paid for the period requested by ILETSB.
 - d) If the Grant Program Manager or their designee discovers issues or concerns, an additional document submission may be required for a period covering the reporting period of the grant term. Grantee may also be placed on a corrective action plan or subject to any of the remedies described in the grant agreement or within ILETSB's authority.

2. Appropriate Forms of Documentation: Supporting documentation means sufficient information to enable ILETSB to reasonably assess whether the reimbursable expenses and other amounts paid by the grant are properly payable. Refer to the "ILETSB Backup Documentation Checklist" for a listing of materials that may demonstrate sufficient proof by budget category.
 - a) Personnel Expenditures: Not authorized under this grant program.
 - b) All Other Non-Personnel Expenditures: To receive payment for allowable expenses, the Grantee must provide evidence that costs were incurred and paid upon request by ILETSB.
 - c) Documented Support That Costs Were Incurred and Paid - Generally, an invoice, receipt or contract supported by a copy of a cancelled check/electronic copy or other document supporting that the transaction was enacted, i.e., bank statement, electronic reference, etc. Note that all copies of cancelled checks, submitted as documentation, should include both the front and back of the check. If the back side is not available, a copy of the respective bank statement can be substituted.
 - d) Eligible Equipment: Cameras and all "associated technology" necessary for the use and operation are eligible for award. In addition to cameras, agencies must identify any additional items they seek to include for award and must provide satisfactory justification explain such items are necessary.
 - e) Data Storage: Costs related to "data storage" must be clearly identified on the supporting documentation. Grantees may provide additional explanation as to the relevance of specific equipment or services purchased for the purpose of maintaining the data recorded from officer-worn cameras.

F. With diligence of the Grant Program Manager or their designee assigned to each grant and supported by further diligence of the Fiscal Team, PFRs by the Grantee will be monitored with the expectation that upon final reconciliation there is a zero balance, with no amount owed to the Grantee, and no amount to be recovered from the Grantee.

- G. Grantees that do not expend all advance payment amounts by end of the grant term and/or are unable to demonstrate that all incurred costs were necessary, reasonable, allowable, or allocable as approved in their respective grant budget are subject to grant funds recovery.

Procedure for Advance Payment:

- A. The Grantee may be paid in advance, provided it maintains or demonstrates the willingness to maintain written procedures that minimize the time elapsing between the transfer of funds and disbursement; and the use of a financial management system that includes the following:
- 1) Identification of all grant awards received, related funds expended, and the programs under which they were received, including the title and number, award identification number, year issued, and name of the awarding agency.
 - 2) Accurate, current, and complete disclosure of the financial results of each grant award or program in reports submitted at the appropriate deadlines, in a format that allows for ILETSB monitoring. The Grantee may develop accrual data for its reports based on an analysis of the documentation on hand.
 - 3) Maintaining records that sufficiently identify the amount, source, and expenditure of grant funds for awards. These records must contain information necessary to identify awards, authorizations, financial obligations, unobligated balances, as well as assets, expenditures, income, and interest. All records must be supported by source documentation.
 - 4) Effective control over and accountability for all funds, property, and assets. The Grantee must safeguard all assets and ensure they are used solely for authorized purposes.
 - 5) Comparison of expenditures with the approved budget amounts for each award.
 - 6) Written procedures to implement the requirements of 44 Ill. Adm. Code 7000.120.
 - 7) Maintenance of records documenting compliance with statutes, regulations, and the terms and conditions of the award, must be sufficient to prepare reports required by the terms and conditions; and tracking expenditures to establish that funds have been used in accordance with statutes, regulations, and the terms and conditions of the award, including any funds used for lobbying or otherwise influencing the creation, passage, or opposition of legislation.
- B. ILETSB requires the completion of additional applications for any Grantee seeking to receive Advance funding to assert that the above conditions are met. Receipt of grant award is not itself approval for the use of advance funding. The determination of this request will be made by the ILETSB Grant Manager. The application will require the following:
- 1) Confirmation that Grantee is making a formal request for Advance payment,
 - 2) A list of required documentation for review, and confirmation that is included with the application,
 - 3) Information, budgets and/or approved pre-award documentation,

- 4) Acknowledgment that all Risk Assessment documentation will be completed: ICQ in the GATA Implementation Site and the PRA,
 - 5) Guidelines regarding the Grantee's eligibility for Advance payment,
 - 6) Information regarding the option to receive reimbursement with a working capital advance if Advance payment criteria are not met. 44 Ill. Admin. Code 7000.120(b)(3).
- C. Advance payments to a Grantee must be limited to the minimum amounts needed and be timed with actual, immediate cash requirements of the Grantee in carrying out the purpose of the approved program or project.
 - D. The timing and amount of advance payments must be as close as is administratively feasible to the actual disbursements by the Grantee for direct program or project costs. The Grantee must make timely payments to contractors, suppliers, or providers in accordance with the contract provisions.
 - E. Whenever possible, advance payment requests by the Grantee must be consolidated to cover anticipated cash needs for all awards received by the recipient from ILET SB.
 - F. Advance payment mechanisms must comply with the preference to distribute funds electronically, which includes, but are not limited to, Treasury checks and electronic funds transfers.
 - G. Grantees must be authorized to submit payment requests as often as necessary when electronic fund transfers are used or at least monthly when electronic transfers are not used.
 - H. ILET SB shall publish written procedures for determining the allowability of costs and advance funding options in accordance with the Administrative Rules of the grant Accountability and Transparency Act and the terms and conditions of the grant award. ILET SB must document the determination that the Grantee meets the requirements of advance payments in accordance with 44 Ill. Adm. Code 7000.120 (b)(1).

Procedure for Reimbursements:

- A. Grantees will be paid via the reimbursement method when they do not meet the requirements of 44 Ill. Admin. Code 7000.120(b)(1), or upon a Grantee's request to use the reimbursement method of payment, or as stipulated in a specific condition. Grantees that have relevant specific conditions noted in their Uniform Grant Agreement based on the results of their Programmatic Risk Assessment (PRA) shall be paid via reimbursement method. Grantees who do not meet the requirements of 44 Ill. Admin. Code 7000.120(b)(1) may also request use of the Working Capital Advance payment method, detailed herein in a subsequent section.
- B. ILET SB will disburse payments to the Grantee based on actual allowable costs incurred or expended as reported in their PFR submitted for the respective period, as described in their grant agreement.

Procedure for Working Capital Advance:

- A. For Grantees that the Grant Program Manager or their designee determines that reimbursement is not feasible because the Grantee lacks sufficient working capital, the ILET SB may, in its sole

discretion, provide a Working Capital Advance to the Grantee. Working Capital Advance payments may be requested by completing the Working Capital Advance Questionnaire or by other means as prescribed by ILETSSB.

- B. Grantees may request a Working Capital Advance payment for each grant program awarded by ILETSSB. Requests must be submitted on the ILETSSB Estimate Working Capital Advance Payment Requirements Forecast (Cash Budget) Form Template to the respective Grant Program Manager or their designee in the method prescribed in the grant program Notice of Funding Opportunity (NOFO), grant agreement, or as prescribed by ILETSSB. The Cash Budget must include monthly cash requirements for every month of the grant term. Grantees must submit an updated cash budget at the request of the ILETSSB Grant Program Manager, their designee, or a representative of the Office of Fiscal Management. A separate request must be submitted for each ILETSSB grant program application. Requests must be signed by either the Chief Executive Officer or Chief Financial Officer (or equivalent) for the entity.
- C. The ILETSSB Grant Program Manager or their designee will advance the working capital payment to the Grantee to cover their estimated disbursement needs for an initial period of grant expenses. Additional startup costs may be approved as part of the working capital payment if determined by the ILETSSB Grant Program Managers or their designees to be allowable.

Financial Reporting:

- A. Grantees must submit monthly PFRs of their actual cash disbursements for reimbursement in a format prescribed by the Grant Program Manager or their designee demonstrating all allowable expenditures for each month of operations until the end of the grant term.
- B. PFRs will be submitted to the respective Grant Program Manager or their designee not later than the 15th day following the end of any respective monthly billing period, or as described by the Uniform Grant Agreement.
- C. The first PFR is due after the first month of grant operations. Monthly PFRs must be submitted to the respective Grant Program Manager or their designee in the method prescribed in the grant agreement or as prescribed by ILETSSB.
- D. Allowable Costs and Documentation:
 - 1. Expenditures submitted on the PFR must represent allowable expenditures incurred and paid for the grant and must be supported by appropriate documentation. If Grantee is unsure whether an expenditure is allowable, review the approved Grantee budget and/or consult with the respective Grant Program Manager or their designee. Grantee is responsible for maintaining appropriate supporting documentation onsite in accordance with the conditions of the grant agreement.
 - 2. Grantee shall submit supporting documentation to the Grant Program Manager or their designee for designated months of review.
 - 3. Generally, ILETSSB shall review supporting documentation for a period of the grant term. Grantee need only submit documentation for costs paid for the period requested by ILETSSB.
 - 4. If the Grant Program Manager or their designee discovers issues or concerns, an additional document submission may be required for a period of the grant term. Grantee may also be

placed on a corrective action plan or subject to any of the remedies described in the grant agreement or within ILETSB's authority.

5. Appropriate Forms of Supporting Documentation: Supporting documentation means sufficient information to enable ILETSB to reasonably assess whether the reimbursable expenses and other amounts paid by the grant are properly payable.
6. Refer to the "ILETSB Backup Documentation Checklist" for a listing of materials that may demonstrate sufficient proof by budget category.
 - i. Personnel Expenditures:
 1. Wages, salaries, and fringe benefit expenditures may be supported with detailed time and attendance records for each person charged directly and/or indirectly to the respective grant program; a PDF copy of the accounting information system wages, salary, and fringe personnel payroll expenditure account(s) for the respective month; and supporting evidence that the costs were paid.
 2. Copies of the filed State and Federal Payroll Tax Forms 941; and the State of Illinois Department of Employment Security IDES Form UI-3/40 to evidence that the payroll taxes and employer contribution for unemployment security were paid may also be provided as supplemental support for personnel expenditures.
 3. All supporting documents shall be provided to ILETSB upon request. All supporting documents shall be PII compliant and encrypted utilizing ILETSB approved encryption software as indicated by ILETSB.
 - ii. All Other Non-Personnel Expenditures: To be reimbursed for allowable expenses, the Grantee must provide evidence that costs were incurred and paid upon request by ILETSB.
- E. PFRs must include all allowable incurred or expended costs for the first period and each subsequent period of operations until the end of the grant term.
- F. PFRs will be submitted to the respective grant program points of contact on or before the 15th day following the end of any respective period. Grant Program Managers may amend the due date from the 15th day of the month to facilitate program and Grantee requirements. ILETSB grant programs must process all payments to ensure that payments can be made within 30 calendar days after receipt of the PFR, unless the State awarding agency reasonably believes the request to be improper. All payments are subject to appropriation, cash availability, and processing by the Office of the Comptroller.

Programmatic Reporting:

- A. Each law enforcement agency receiving a grant for in-car video cameras must provide an annual report to the Board, the Governor, and the General Assembly on or before May 1 of the year following the receipt of the grant and by each May 1 thereafter during the period of the grant. The report shall include the following: (1) the number of cameras received by the law enforcement agency; (2) the number of cameras installed in law enforcement agency vehicles; (3) a brief description of the review process used by supervisors within the law enforcement agency; (4) a list of any criminal, traffic, ordinance, and civil cases in which in-car video recordings were used, including party names, case numbers, offenses charged, and disposition of the matter. Proceedings to which this paragraph (4) applies include, but are not limited to, court proceedings, coroner's inquests, grand jury proceedings, and plea bargains; and (5) any other information

relevant to the administration of the program.

- B. Each law enforcement agency receiving a grant for officer-worn body cameras under Section 10 of this Act must provide an annual report to the Board, the Governor, and the General Assembly on or before May 1 of the year following the receipt of the grant and by each May 1 thereafter during the period of the grant. The report shall include: (1) a brief overview of the makeup of the agency, including the number of officers utilizing officer-worn body cameras; (2) the number of officer-worn body cameras utilized by the law enforcement agency; (3) any technical issues with the equipment and how those issues were remedied; (4) a brief description of the review process used by supervisors within the law enforcement agency; (5) for each recording used in prosecutions of conservation, criminal, or traffic offenses or municipal ordinance violations: (A) the time, date, and location of the incident; and (B) the offenses charged and the date charges were filed; (6) for a recording used in a civil proceeding or internal affairs investigation: (A) the number of pending civil proceedings and internal investigations; (B) in resolved civil proceedings and pending investigations: (i) the nature of the complaint or allegations; (ii) the disposition, if known; and (iii) the date, time and location of the incident; and (7) any other information relevant to the administration of the program.
- C. After receiving an award, grant recipients shall collect data and furnish reports to the Illinois Law Enforcement training Standards Board before May 1st of each year.
- D. ILETSB shall prepare an annual report to the General Assembly and Governor by July 30th of each year summarizing the data and information provided in the individual agency reports.
- E. Data collection must be comprehensive and follow the guidelines and best practices provided by the Grant Accountability and Transparency Unit.

Payment Process:

- A. ILETSB grant programs must process all payments to ensure that payments are made within 30 calendar days after receipt of the billing unless the State awarding agency reasonably believes the request to be improper.
- B. At least sixty days prior to the end of the grant term, or at the discretion of the Grant Program Manager, ILETSB will stop remitting payments for Grantee actual cash disbursements. The Grant Program Manager or their designee will reconcile Grantee invoices to the working capital advance remaining cash balance.

Insured and Interest-Bearing Accounts:

- A. ILETSB must not require separate depository accounts for funds provided to the Grantee or establish any eligibility requirements for depositories. However, the Grantee must be able to account for all grant funds received, obligated, and expended.
- B. Working Capital and Advance payments of grant funds must be deposited and maintained in insured accounts whenever possible.
- C. The Grantee must maintain Working Capital and Advance payments of grant funds in interest-bearing accounts unless one of the following applies:
 - 1. The Grantee receives less than \$250,000 in grant funding per year;
 - 2. The best available interest-bearing account would not reasonably be expected to earn interest in excess of \$500 per year on grant funded cash balances;

3. The depository would require an average or minimum balance so high that it would not be feasible with the expected grant and non-grant cash resources;
 4. A foreign government or banking system prohibits or precludes interest-bearing accounts; or
 5. An interest-bearing account is not readily accessible (for example, due to public or political unrest in a foreign country).
- D. The Grantee may retain up to \$500 per year of interest earned on grant funds to use for administrative expenses of the Grantee. Any additional interest earned on grant funds must be returned annually to ILETSB through either the Automated Clearing House (ACH) network or a payment system approved by the Illinois Treasury or Comptroller. All interest in excess of \$500 per year must be returned to ILETSB regardless of whether the Grantee was paid through ILETSB.

Award Procedures:

- A. Applications will be evaluated and assessed based upon community characteristics and agency need. Awards are subject to the availability of appropriated funds and recipients must comply with all special reporting requirements found in Sections 15 and 20 of the Law Enforcement Camera Grant Act.
- B. Awards will be issued on a rolling basis with new awards issued at the first of each month until the program concludes on June 30, 2025.

Withholding:

- A. Payments for allowable costs must not be withheld at any time during the period of performance unless required by statute, regulations, or in one of the following instances:
 1. The Grantee has failed to comply with the terms and conditions of the award; or
 2. The Grantee is delinquent in a debt to the United States, or state of Illinois. Under such conditions, ILETSB may, after providing reasonable notice, withhold payments to the recipient or subrecipient for financial obligations incurred after a specified date until the conditions are corrected or the debt is repaid.
- B. A payment withheld for failure to comply with the terms and conditions of the award must be released to the Grantee upon subsequent compliance. When an award is suspended, payment adjustments must be made if the costs were incurred prior to the suspension and if the costs were otherwise allowable at the end of performance.
- C. A payment must not be made to a Grantee for amounts that the Grantee withholds from contractors to assure satisfactory completion of work. Payment must be made when the Grantee disburses the withheld funds to the contractors or to escrow accounts established to ensure satisfactory completion of work.

Return of Funds:

All other grant funds must be returned to the payment system of ILETSB and the State of Illinois. Returns should follow the instructions provided by ILETSB.