Agenda
Village of Glen Ellyn
Special Village Board Workshop
Monday, August 30, 2021
7:00 PM
Glen Ellyn Civic Center,Room 301
In Person Only

Meeting Procedures Statement

Visitors are welcome to attend all meetings of the Village Board and can find copies of the Agenda at the meeting or online at www.glenellyn.org prior to the meeting. Any individual with a disability requiring a reasonable accommodation in order to participate in a meeting should contact The Village of Glen Ellyn ADA Coordinator, 630-469-5000, in advance of the next scheduled meeting. All matters on the Agenda may be discussed, amended, and acted upon.

A. Call to Order

B. Pledge of Allegiance

C. Roll Call

D. Audience Participation

1) Open:

Members of the public are welcome to speak to any item not specifically listed on tonight's agenda for up to (3) three minutes. For those items which are on tonight's agenda, the public will have the opportunity to comment at the time the item is discussed. In either case, please complete the Audience Participation form and turn it in to the Village Clerk. It is requested that, if possible, one spokesman for a group be appointed to present the views of the entire group. Speakers who are recognized are requested to step to a microphone and state their name, their topic and the group, if any, they are representing prior to addressing the Village Board. Individuals wishing to address the Board shall exercise proper decorum and respect for the proceedings and the business of the Village Board, and shall refrain from abusive demeanor and language. The practice of ceding time to other speakers shall be prohibited, except in the discretion of the presiding officer of the meeting. Public officials are not obligated to respond to questions.

In lieu of participating in the live meeting, the public may also complete a public comment form, which will be read into the record during the meeting. This form can be found at www.glenellyn.org/publiccomment.

E. Police Department Assessment and Staffing Analysis (Presented by Police Chief Norton) (Discussion Only)

1) Police Chief Norton will lead a discussion on the Glen Ellyn Police Department's assessment and staffing analysis.

F. Quarterly Financial Update (Presented by Finance Director Coyle) (Discussion Only)

1) Finance Director Coyle will present the second quarter financial report.

G. American Rescue Plan Act (ARPA) Update (Presented by Finance Director Coyle) (Discussion Only)

1) Finance Director Coyle will update the Village Board on the American Rescue Plan funding.

H. Other Business

I. Motion to adjourn to Executive Session for the discussion of the selection of a person to fill a public office, including a vacancy in public office, pursuant to 5 ILCS 120/2 (C)(3) and discussion regarding the recruitment, credentialing, discipline or formal peer review of physicians or other health care professionals for a hospital, or other institution providing medical care, that is operated by the public body pursuant to 5 ILCS 120/2 (C)(17), without returning to open session thereafter.

Glen Ellyn Village Board
535 Duane Street
Glen Ellyn, IL 60137

Meeting 8/30/2021 7:00 PM
Department: Police
Department Head:
Category: Discussion Item
Prepared By:

AGENDA ITEM (ID # 2021-1367)

DOC ID: 2021-1367

Police Chief Norton will lead a discussion on the Glen Ellyn Police Department's assessment and staffing analysis.

Statement of the Issue:
Please see the attached memo.

Analysis:
Please see the attached memo.

Budget Impact:
Please see the attached memo.

Action Requested:
Discussion only.

Attachments:

1. cover memo
2. Glen Ellyn Report - Final 8.9.21

MEMORANDUM

To: Mark Franz, Village Manager

From: Philip J. Norton, Chief of Police

Date: August 17, 2021

Re: Police Staffing Study

Issue

A discussion of the Glen Ellyn Police Department Staffing Study.

Background

In 2019, the Village Board approved a staffing study for the Police Department. A RFP (Request for Proposal) was published in January of 2020, but the project was put in abeyance due to the pandemic and a need to temporarily shift priorities. Interviews with consultants occurred in September of 2020 and McGrath Consulting Group was chosen to conduct the study by the Village team, which included members of the Village Administration, Finance, Human Resources, and the Police Department.

McGrath collected copious amounts of data from the Village and Police Department and conducted almost 90 interviews. Interviews included every Police Department employee and over 30 interviews of key stakeholders, which included Village Administration, Village Trustees, business leaders, clergy, etc.

A first draft was delivered on May 3, 2021. The Village team met on several occasions to discuss clarifications and modifications to the initial draft, which resulted in a final draft being delivered on August 10, 2021.

The final document is 117 pages in length. It is important to note the aforementioned Village team discussions were lively as differing points of view were expressed. Some may find that the recommendations go too far and some may find they do not go far enough. Please remember the recommendations contained therein are merely that, and the decision of which ones to adopt, rests with the Police Department and Village.

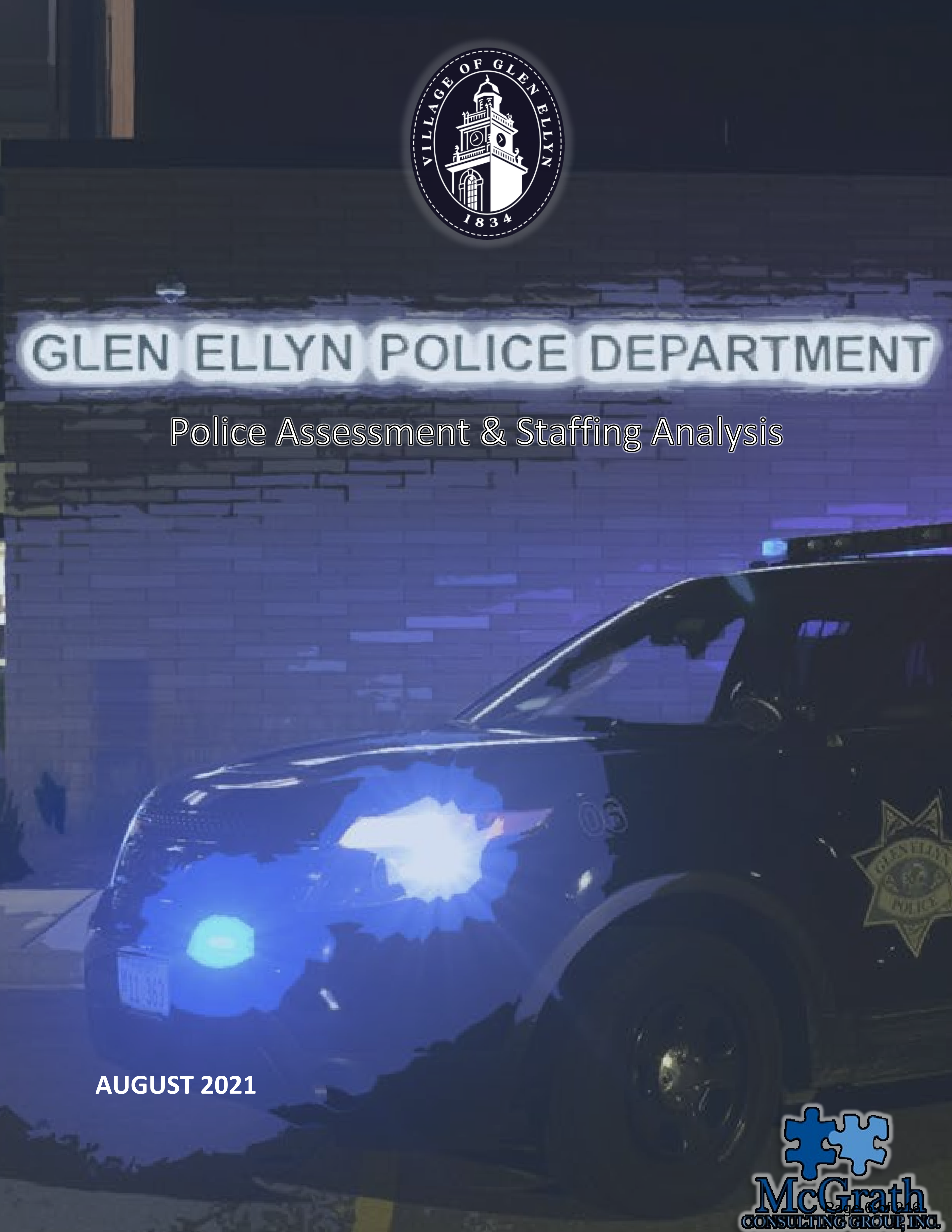
While the vast majority of the recommendations are supported by the Village team, there may be some aspects of the report that ultimately do not get implemented. Of course, any time personnel levels are discussed, the Village Board and budget considerations will play a key role in that final determination and how we move forward.

There are 51 total recommendations, which include 2 additional sworn (police officer) positions above the temporary approval of 43 that exists today. It also recommends filling a vacant, full time civilian position and creating a part-time civilian position.

Some key pages contained in the report are:

- Page 7 Executive Summary
- Page 107 Estimated Minimum Personnel Costs
- Page 108 Recommend Organizational Chart
- Page 113 Table of Consultant Recommendations

We look forward to the Village Board workshop discussion on August 30, 2021



GLEN ELLYN POLICE DEPARTMENT

Police Assessment & Staffing Analysis

AUGUST 2021

McGrath Consulting Group, Inc.
P.O. Box 190 Wonder Lake, IL 60097 Office (815) 728-9111
Fax (815) 331-0215
Web Page: www.mcgrathconsulting.com

TABLE OF CONTENTS

TABLE OF TABLES

TABLE OF FIGURES

EXECUTIVE SUMMARY

McGrath Consulting Group, Inc., an organization that specializes in public sector consulting, was contracted by the Village of Glen Ellyn, Illinois to conduct a Police Assessment and Staffing Analysis. Ron Moser, Lead Police Consultant, served as the Project Manager. A team of consultants brought their wide array of professional expertise to this project. As this project was conducted during the COVID-19 pandemic, work was performed off-site, and meetings were through electronic means.

Recommendations are made related to organizational structure and staffing.

The department should restructure and clearly define the divisions of patrol, investigations, and support. Each of these divisions should be led by the new rank position of commander. The commanders will report directly to the deputy chief. This realignment and addition of positions will coordinate services and provide a more manageable span of control for the supervisory and command staff. This will also allow the department's administrative leadership the opportunity to grow and develop subordinates.

Three new positions of patrol officer are recommended to be added to the patrol shifts. This will provide each shift with seven officers. An additional investigator should be added to the Investigations Division and will be designated as a mental health and community engagement investigator.

The program coordinator position should be staffed and funded. A new part-time position of civilian administrative assistant should be created and assigned to report the deputy chief. This position will also assist all division commanders upon the direction of the deputy chief.

The crossing guards should be privatized through a third-party contract and employment will transfer to a private firm. Therefore, they will no longer be included in the organizational structure.

Midway during the work on this project Illinois House Bill 3653 was signed into law as Public Act 101-0652 – dubbed the SAFE-T Act (Safety, Accountability, Fairness and Equity – Today). This statute has far reaching issues that affect police training, accountability, reporting, use of force, and other matters. In applicable sections reference is made to mandates the department address. There is urgency as some provisions and requirements are effective July 1, 2021.

The department should carefully review, update, and add needed sections to the Policy Manual. The manual has not been fully developed. This will require a dedicated individual to manage the process.

Supervision and leadership in the department is strong and internal relationships are reported as positive.

Equipment and technology are good and has been improved greatly in recent years.

Recommendations are made to improve human resource functions within the department as well as interactions with other stakeholders.

The department receives tremendous support from the community and relations are reported as very good between the community and the department; both from the perspective of the police employees as well as the community members. Both the department and the village should take pride in this. Perhaps never in policing in our country has this been such an important and crucial matter.

Consultants have provided 51 recommendations to the village. Those recommendations are listed within sections of the report as well as a comprehensive listing in Appendix D.

The consultants would like to extend appreciation to Village Manager Mark Franz, Police Chief Phil Norton, Deputy Chief Kurt Vavra, Administrative Assistant Christine Miller, and other village and police staff, for their time, cooperation and sharing of information with McGrath Consulting Group, Inc.

INTRODUCTION

Study Methodology
McGrath Consulting Group, Inc.'s methodology for obtaining data and completing the assessment includes quantitative data analysis, qualitative on-site observations, and stakeholder interviews.

Quantitative Data Analysis
Quantitative methods emphasize objective measurements and the statistical, mathematical, or numerical analysis of data collected. Quantitative data is any data that is in numerical form such as statistics, percentages, etc.; allowing the consulting team to analyze the data to yield an unbiased result that will validate the information gathered by the consulting team.

Quantitative research using statistical methods starts with the collection of data based on the objectives of the study and developing employee interview questions in a manner which give a quantitative measurement of qualitative answers.

Qualitative Observations
Qualitative methodology is a method of observation to gather non-numerical data e.g. thoughts, opinions, and key issues. Qualitative methods used included observations by the consulting team

and in-depth interviews with stakeholders. All organizations have a culture which is comprised of beliefs and behaviors that determine how members behave. Qualitative research allows the consulting team to understand the opinions, attitudes, behavior, feelings, beliefs, values, perceptions, and underlying assumptions that comprise an organization's culture.

Stakeholder Interviews

During the course of the study, the consulting team conducted structured telephone interviews with all department employees (excluding one recruit officer attending the academy and the seasonal part-time crossing guards). These interviews included 39 rank ordered and four open ended questions. Also interviewed were persons from outside the department but are stakeholders in the community. These persons included current and former elected officials, other village department staff, members of the business community, school officials, church leaders, volunteers on village committees, criminal justice practitioners, and others. This group was asked eight rank ordered and four open ended questions. Fifty-five employees and 34 community members for a total of 89 persons provided responses to the interviews. These questions were developed to help gain feedback on optimizing staffing and assessing the department. The aggregate results of the survey questions will be provided within the relevant areas of the report. A copy of the department employee survey questions is provided in Appendix A, and questions for community members is provided as Appendix B.

Survey of Comparables

Twelve comparable police departments in DuPage County were surveyed to obtain information on staffing and other issues. The results of the survey are included in appropriate sections of the report as well as the entire chart.

Recommendations

The report includes an overview of the department by related topics. Each of these topic sections includes a review of the status quo, department self-assessment perceptions, and recommendations as applicable.

Overall, the consultants provide 51 recommendations for the village's consideration. At the close of each section throughout the report, a list of recommendations will be provided for that section. Additionally, all recommendations are summarized in chart format in Appendix D. Each recommendation has been ranked with a priority level by the consultants.

The table below identifies how each level of priority has been defined.

Table 1: Priority Definitions for Recommendations

PRIORITY	DEFINITION	EXAMPLE
1	**Urgent/Immediate**	Potential issue of legality or detriment to the village, in which essential action is needed.
2	**Pressing < Priority 2**	Significant impact on organization; action needed as soon as possible.
3	**Important < Priority 3**	Organization will benefit by addressing soon; items that should be accomplished.

ORGANIZATIONAL STRUCTURE AND STAFFING

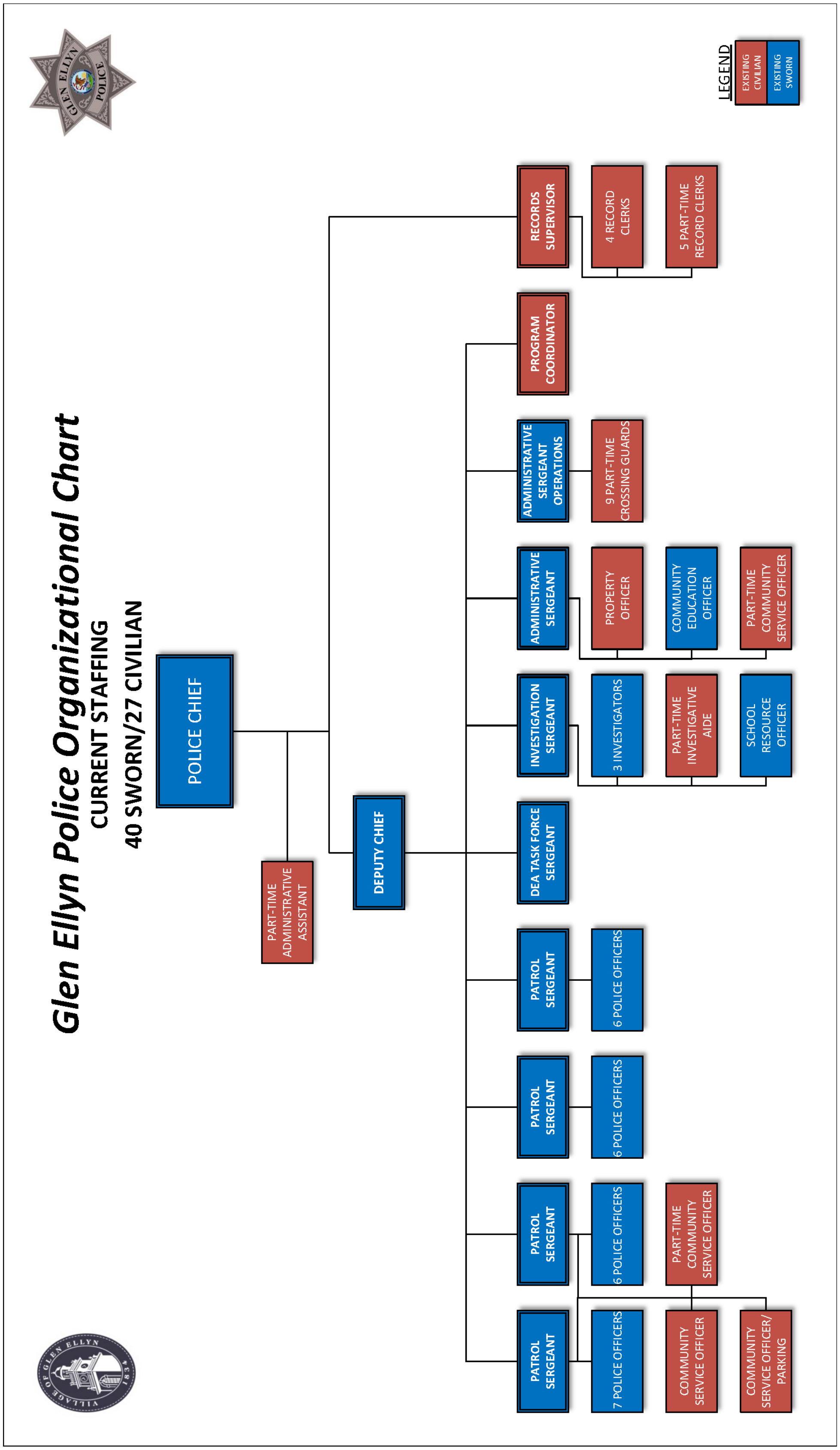
Department Staffing

The current budgeted staffing of the department includes 40 full-time sworn personnel, nine full-time civilians and 18 part-time civilians. The contingent of sworn personnel includes the chief, deputy chief, four patrol sergeants, one sergeant assigned to the Drug Enforcement Agency (DEA) Task Force (canine), one investigations sergeant, one administrative sergeant, one administrative sergeant of operations, 25 police officers assigned to patrol, three investigators, one school resource officer (SRO), and one community education officer. Although not budgeted, the department is authorized to fill two additional police officers, which if all positions were filled would bring sworn staffing to 42 positions. At the time of writing the report, all management, supervisory, and specialty police officer positions (investigators, SRO, and community education) are filled. Of patrol officer positions, 24 are filled, however, three are in recruit training, (basic academy or field training), and do not count toward minimum patrol staffing. Two patrol officers and one patrol sergeant are either currently or soon to be off on leaves. The department struggles to fill vacant positions. Recruiting and hiring entry level police officers is recognized as a nationwide problem, not only at Glen Ellyn.

Authorized civilian staffing includes one full-time position of police program coordinator, however, this position is not budgeted in the current budget, one records supervisor, one property officer, four records clerks, one community service officer, and one community service officer assigned to parking. Part-time positions include an administrative assistant to the chief, one community service officer, one community service officer assigned to fingerprinting duties, five records clerks, one investigative aide and nine crossing guards.

The current organizational chart is presented as follows.

Figure 1: Current Organizational Chart



Overall staffing needs are affected by increasing mandatory duties, special events, as well as village growth and development. The duties and responsibilities for the Glen Ellyn Police Department have vastly increased in the past decade. These added duties and responsibilities have led to improved, more effective fair and impartial policing but demand much more time to accomplish. Many additional time-consuming tasks and responsibilities have been added to duties of the department.

The following is a listing of those additional duties and tasks as identified by the police administration having occurred in the last 10 years:

- Technology – increased use in investigations that create additional leads and additional training to maintain proficiency. Including but not limited to automated license plate readers, Cellebrite telephone digital investigative device, pole cameras, social media, computer forensics, etc. Technology has increased the volume of investigative leads and time required to follow up on those leads. The time required to maintain additional equipment has increased.
- Higher expectation on investigations for prosecution and a higher volume of search warrants being conducted.
- Task force participation – increased presence on several task forces in the Metropolitan Emergency Response and Investigative Team (MERIT).
- Community outreach – increased expectations to maintain community programs (citizen police academy, community presentations, social media presence).
- Sexual Assault Investigations training for every patrol officer and advanced training requirement for investigators.
- Increased requirements for sexual assault reporting.
- Death Investigator certification required for investigators and continuing education requirements.
- Drug Recognition Expert certification is now required on many DUI drug cases for successful prosecution.
- State mandated training requirements.
- School resource officer mandated training requirements.

Additionally, there are numerous major events that require additional staffing throughout the year. Many of the special events are liquor licensed. Due to the need for increased security when alcohol is served at events, the department often tasks officers with oversight, taking them away from patrol or assigned directly to the event. The department provided the following list of annual events and required staffing:

Glen Ellyn Chamber Halloween Parade

- Two officers dedicated for a total of 5 hours.
- Most officers from the shift assist with the parade.

Jazz up Glen Ellyn Music Event
- Two/three officers for 20/30 hours total.

Glen Ellyn Boat Regatta
- Police chief and one or two officers 10-15 hours total.

Sounds on The Street Music Event
- Two officers for a total of 12 hours.

Glen Ellyn Village Fair
- Multiple officers for five days for a total of 162 hours.

Glen Ellyn Chamber Taste of Glen Ellyn
- Multiple officers for four days for a total of 161 hours.

July 4th Parade, Fireworks, 5K Race
- Sixteen officers/CSOs working 8 hour shifts for a total of 128 hours.
- Three officers working 12 hour shifts for a total of 36 hours.
- Three officers from patrol to assist with activities for a total of 11 hours.

Glen Ellyn Chamber Holiday Walk
- Three to five officers for 24-40 hours total.
- Three CSOs for 24 hours total.

Backyard Barbeque Bridge Communities Event
- Two officers for a total of 21 hours.
- Sometimes an extra officer is requested.

Glenbard West High School Homecoming Parade
- Police chief, one officer and two CSOs for a total of 3 hours.

Tour Of Glen Ellyn Bike Race
- At least two officers, one CSO and one supervisor for a total of approximately 40-50 hours.

Country Roads Music Event
- Two officers for 6 hours each – total of 12 hours.

Glen Ellyn Annual Sidewalk Sale
- Multiple shift officers/CSOs throughout the several day event.

Glen Ellyn Baseball Parade
- At least two officers from the shift and a CSO – total of 7 hours.

Approximately seven to nine 5K runs or special walks that require police personnel as well as high school football games and other events.
The village is facing growth in population, buildings, and business through new development and annexation. This growth will impact police service levels. The following developments and annexations were provided to consultants from village personnel.

New Development (approved & pending):
- Apex 400 – 107 new apartment units (9 studio, 12 Jr 1-bed, 60 1-bed, 26 2-bed) – under construction
- Avere of Duane – 48 new apartment units (8 1-bed, 40 2-bed) – under construction

- Glenwood Station – 86 new apartment units (4 Jr 1-bed, 47 1-bed, 35 2-bed) – under review December/January
- Harding Glen Townhomes – 23-unit townhome development (3 bedroom floor plans) – under review 2021
- Glen Estates Subdivision – 8 single family home development (floorplan unknown) – under review 2021

Annexations (approved & pending):

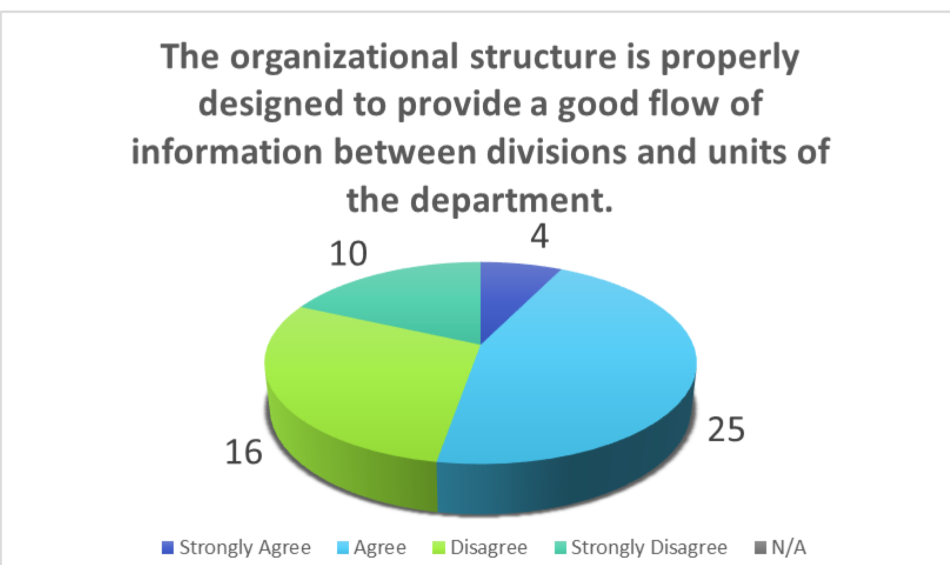
- 1S750 Milton – Single Family Home – approved
- 2S611 Park – Single Family Home – approved
- 21W518 Fairway – Single Family Home – approved
- 0N276 Cumnor – Single Family Home – approved
- 0N282 Cumnor – Single Family Home – approved
- 21W536 Acorn – Single Family Home – approved
- 0N461 Scott – Single Family Home – approved
- 21W201 – 21W171 Hill Avenue – 4 Single Family, 14 Industrial Units in 5 buildings – approved
- Cumnor/Acorn Area – 8 Single Family – pending
- Arboretum Estates East – 35 Single Family – approved, but will be annexed in 2023
- 2S706 Park – Arden Courts (60 bed Memory Care Facility) – pending 2021

In structured interviews department personnel were asked to rank the following statements:

THE ORGANIZATIONAL STRUCTURE IS PROPERLY DESIGNED TO PROVIDE A GOOD FLOW OF INFORMATION BETWEEN DIVISIONS AND UNITS OF THE DEPARTMENT.

From the interview data analyzed a gap in desired internal communication is noted.

Figure 2: Staff Survey Interview Question # 6



Strongly Agree	7%
Agree	45%
Disagree	29%
Strongly Disagree	18%
N/A	0%

Efficient and effective communication is essential to the professional operation of every police department. It is imperative that the communication strategy is designed and implemented to ensure that every member of the department is included in the departmental communication system and not limited to supervisory staff and sworn officers. One way to ensure that departmental communication is effective at all levels of the department is to engage in a two-way communication strategy in which feedback is sought from all levels of the department.

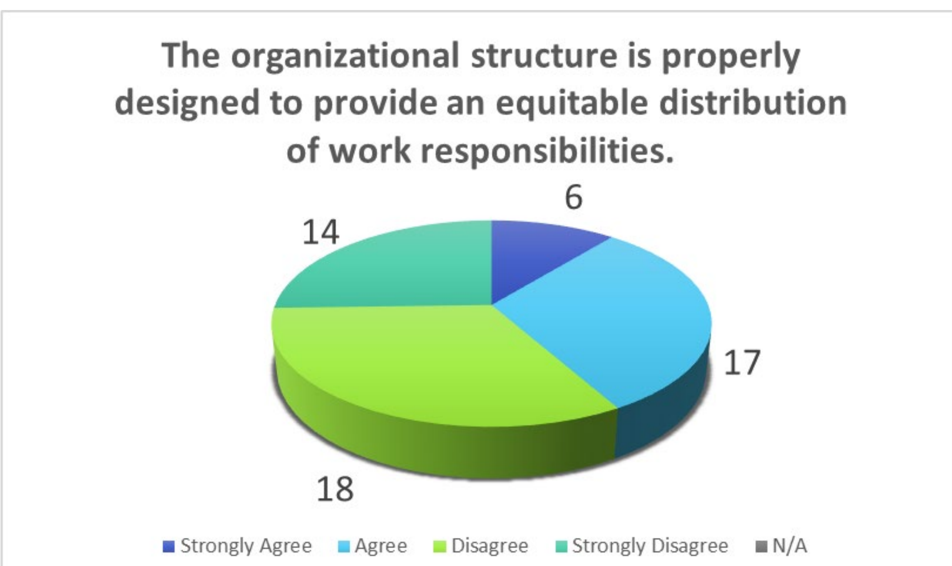
Twenty-six police department employees indicated that departmental communication is an issue of concern. There are eight specific comments during police department employee interviews that directly relate to this issue. Three of the eight comments cite the department structure and work overload of the deputy chief as a problem. Three of the eight indicate that information does not reach employees outside of the supervisors and/or patrol units. The remaining two comments are non-specific, stating that there needs to be an improvement.

There are no concrete examples in the comments of what type of communication is problematic or what communication systems and structures are currently in use that either work well or need improvement.

THE ORGANIZATIONAL STRUCTURE IS PROPERLY DESIGNED TO PROVIDE AN EQUITABLE DISTRIBUTION OF WORK RESPONSIBILITIES.

From the interview data analyzed a gap in organizational structure to provide equitable distribution of work responsibilities is noted.

Figure 3: Staff Survey Interview Question # 9



Strongly Agree	11%
Agree	31%
Disagree	33%
Strongly Disagree	25%
N/A	0%

Thirty-two employees indicated that this issue is a concern. There are nine specific comments during police department employee interviews that directly relate to this issue.

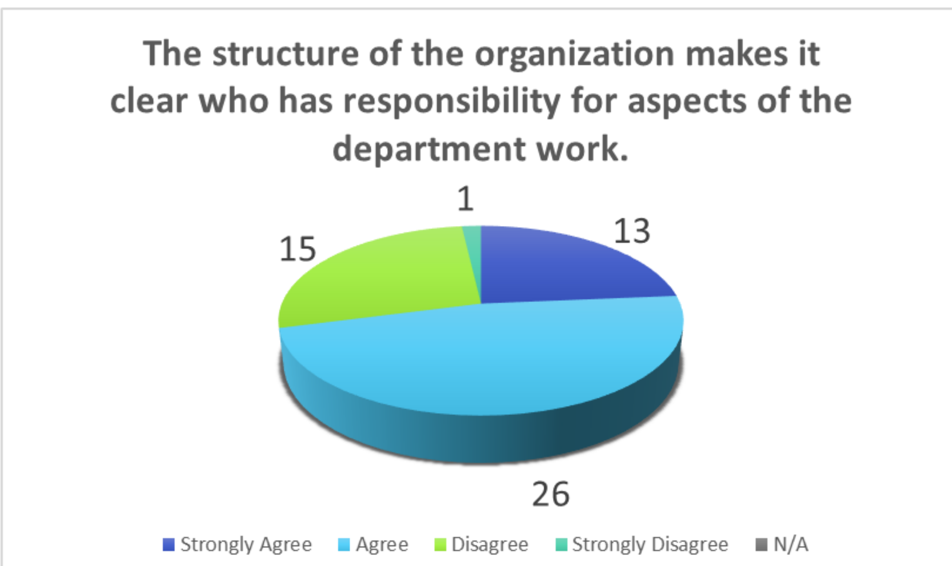
Six of the eight comments can generally be summarized as: The department reorganized to transfer some of the responsibilities of a then current deputy chief to a civilian position. The general consensus is that this position did not solve the problems that they were experiencing. The deputy chief is an exceptional person but is grossly overworked and this causes a bottleneck that severely impacts the department in a negative way. A sixth comment is by extension related to this same issue; the chain-of-command is not always followed.

One comment specifically pertained to a perceived insufficient staffing level in the Investigation Section.

Two comments were very general, essentially stating that "it does not work", and "We do the best we can with what we have."

THE STRUCTURE OF THE ORGANIZATION MAKES IT CLEAR WHO HAS RESPONSIBILITY FOR ASPECTS OF THE DEPARTMENT WORK.

Figure 4: Staff Survey Interview Question # 10

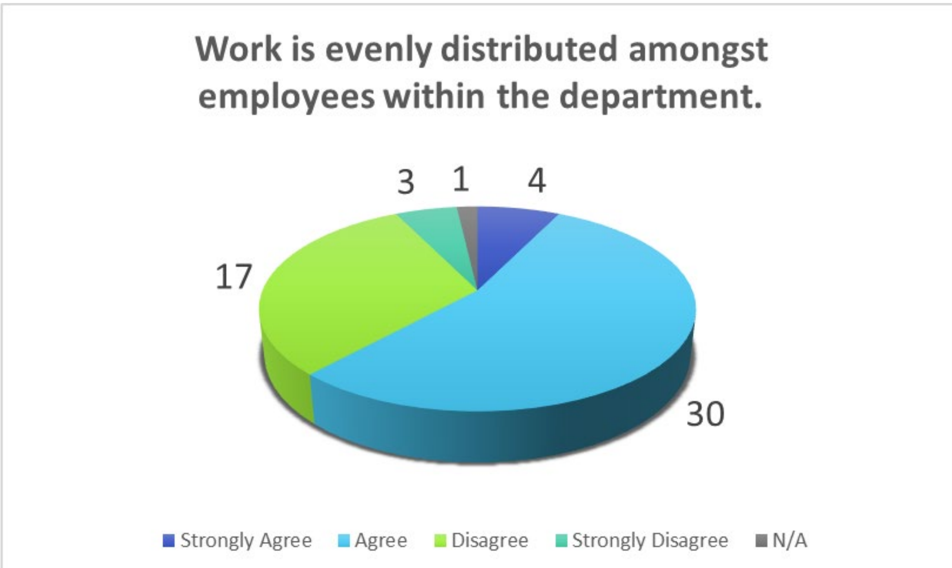


Strongly Agree	24%
Agree	47%
Disagree	27%
Strongly Disagree	2%
N/A	0%

WORK IS EVENLY DISTRIBUTED AMONGST EMPLOYEES WITHIN THE DEPARTMENT.

From the interview data analyzed a gap in equitable distribution of work responsibilities is noted.

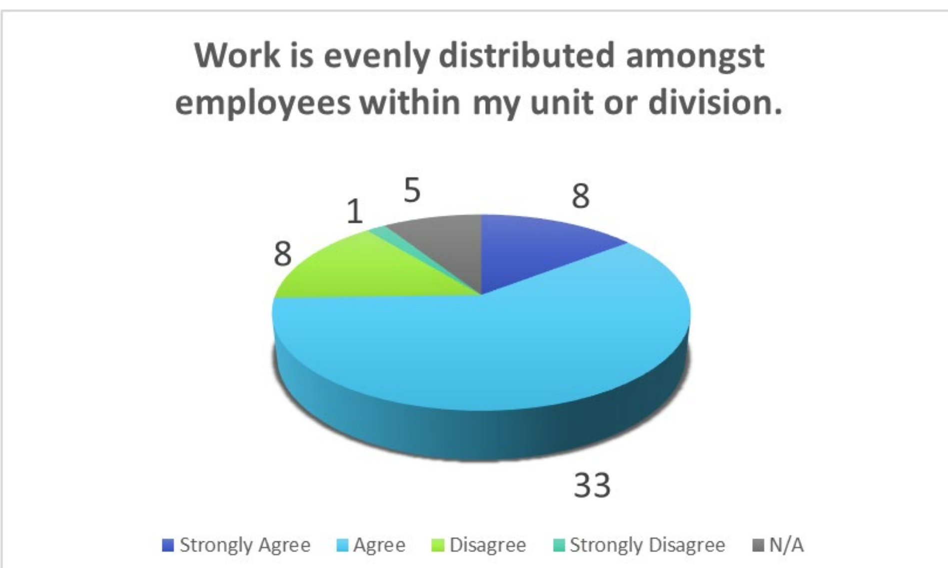
Figure 5: Staff Survey Interview Question # 11



Strongly Agree	7%
Agree	55%
Disagree	31%
Strongly Disagree	5%
N/A	2%

WORK IS EVENLY DISTRIBUTED AMONGST EMPLOYEES WITHIN MY UNIT OR DIVISION.

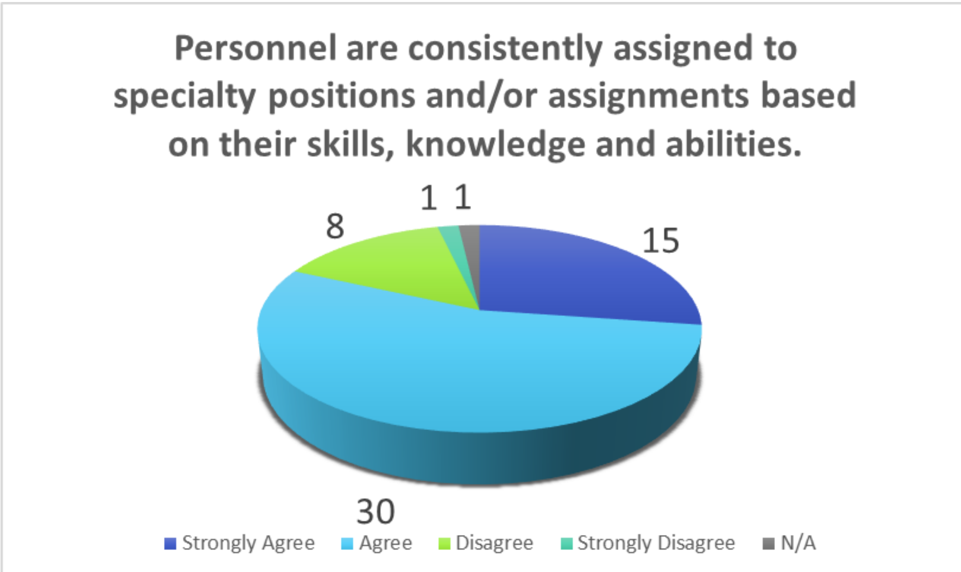
Figure 6: Staff Survey Interview Question # 12



Strongly Agree	15%
Agree	60%
Disagree	15%
Strongly Disagree	2%
N/A	9%

PERSONNEL ARE CONSISTENTLY ASSIGNED TO SPECIALTY POSITIONS AND/OR ASSIGNMENTS BASED ON THEIR SKILLS, KNOWLEDGE AND ABILITIES.

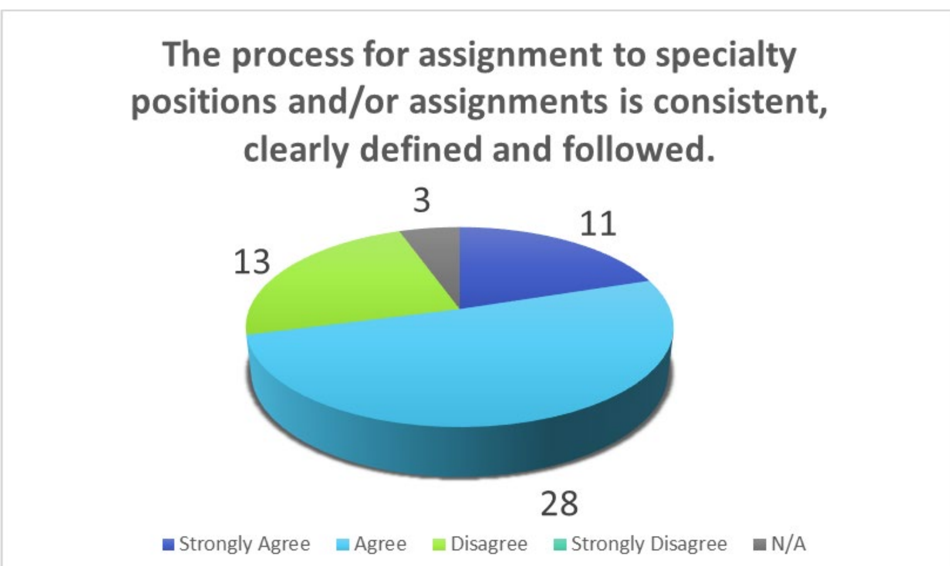
Figure 7: Staff Survey Interview Question # 1



Strongly Agree	27%
Agree	55%
Disagree	15%
Strongly Disagree	2%
N/A	2%

THE PROCESS FOR ASSIGNMENT TO SPECIALTY POSITIONS AND/OR ASSIGNMENTS IS CONSISTENT, CLEARLY DEFINED AND FOLLOWED.

Figure 8: Staff Survey Interview Question # 2



Strongly Agree	20%
Agree	51%
Disagree	24%
Strongly Disagree	0%
N/A	5%

Department Scheduling

The Glen Ellyn Police Department currently utilizes a five day per week, eight-hour workday schedule for full-time employees not assigned to the Patrol Division. Annual standard hours worked for these employees is 2,080.

The department currently utilizes a 12-hour work schedule in the Patrol Division, commonly referred to as a Pittman Schedule. The collective bargaining agreement (CBA) provides for 2,080 work hours per year for sworn officers of the department.

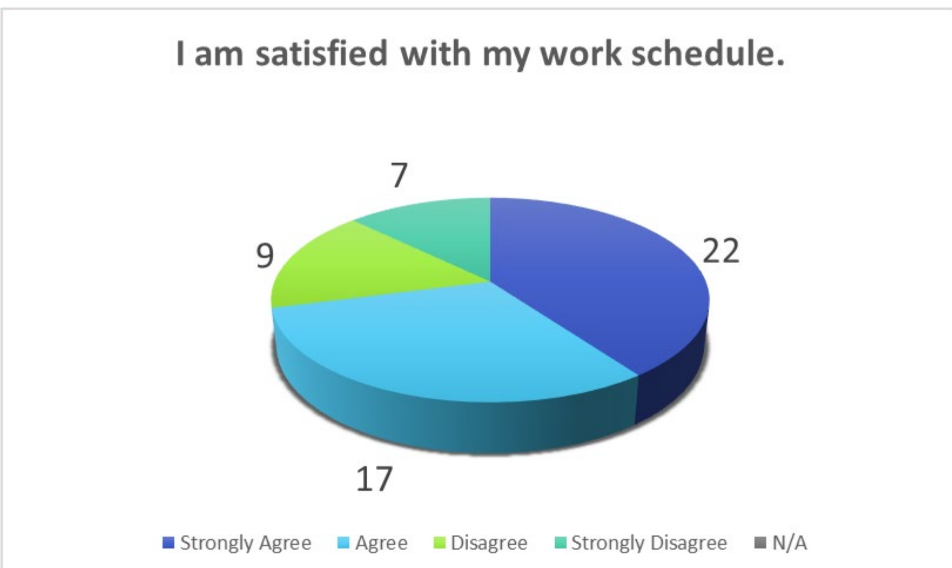
The canine officer is assigned to the Investigation Section and the schedule is addressed in department policy 335.9.

The current organizational structure provides the Patrol Division with four shifts, each staffed with one sergeant. Three of the shifts have six officers and one shift has seven officers assigned, when at full staffing. However, patrol is seldom at full staffing due to vacancies, officers in recruit training, sick days, and other forms of leave. The organizational structure provide the Investigation Section with three investigators, one school resource officer (SRO) and one civilian investigative aide supervised by the investigation sergeant. The Patrol Division and the Investigation Section are managed by the deputy chief of police.

In structured interviews department personnel were asked to rank the following statements:

I AM SATISFIED WITH MY WORK SCHEDULE.

Figure 9: Staff Survey Interview Question # 28

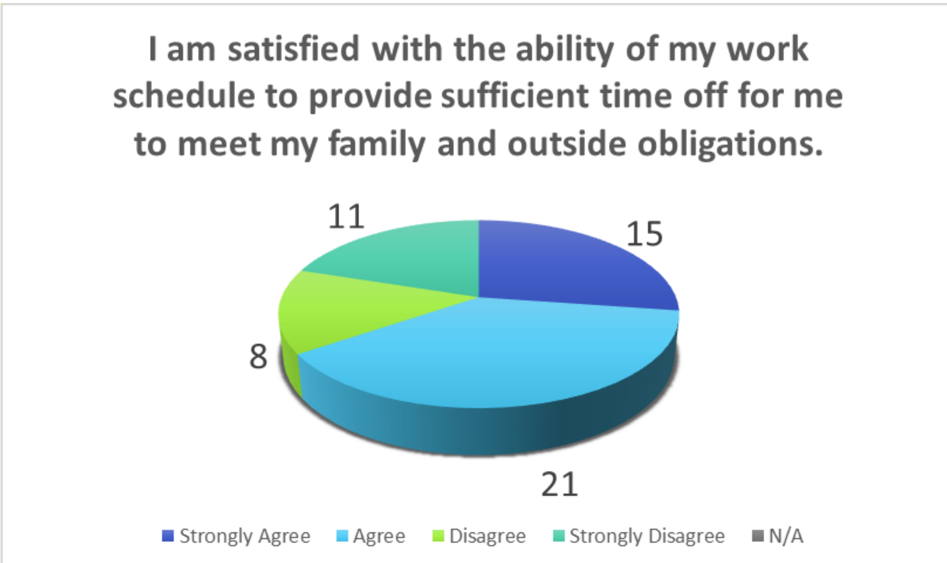


Strongly Agree	40%
Agree	31%
Disagree	16%
Strongly Disagree	13%
N/A	0%

I AM SATISFIED WITH THE ABILITY OF MY WORK SCHEDULE TO PROVIDE SUFFICIENT TIME OFF FOR ME TO MEET MY FAMILY AND OUTSIDE OBLIGATIONS.

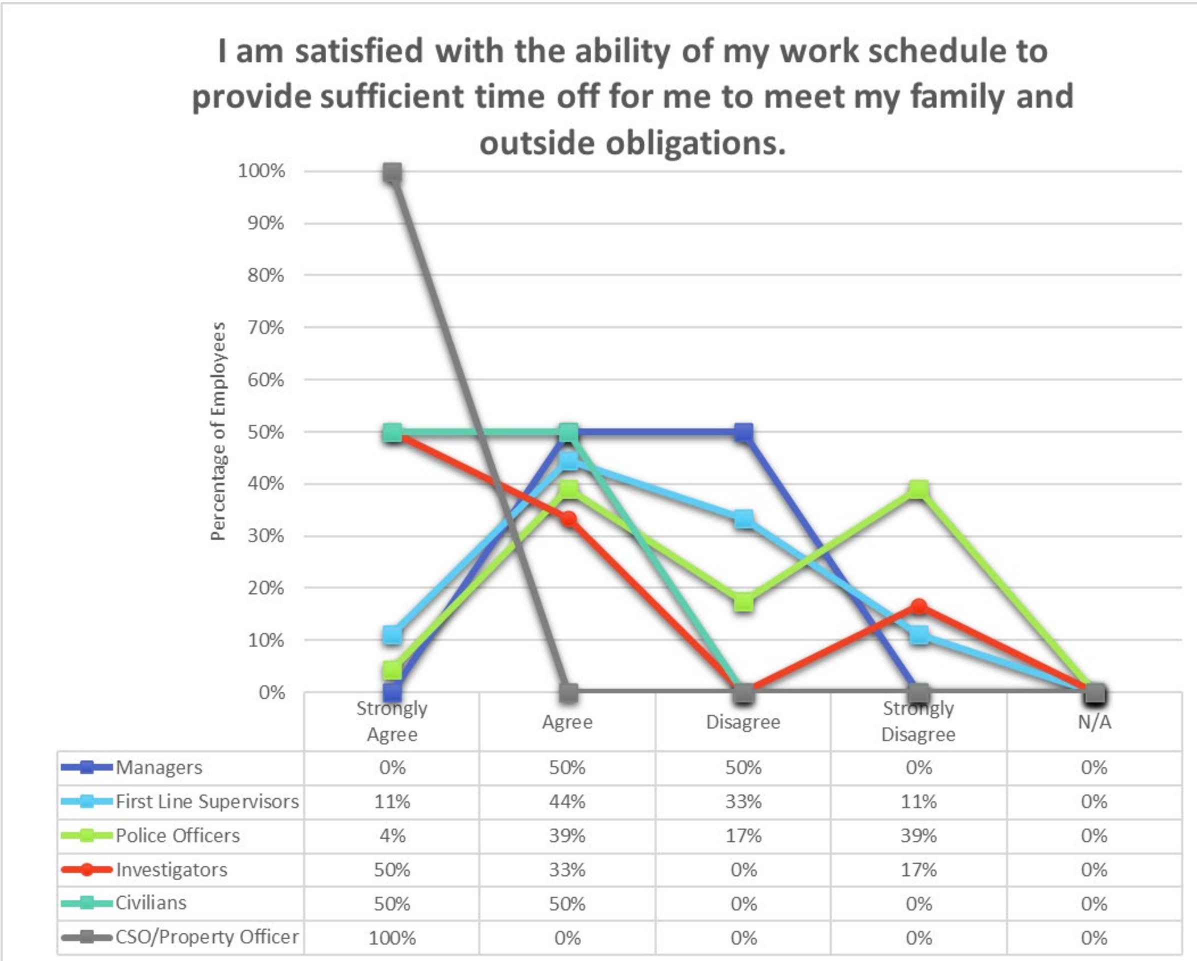
From the interview data analyzed a gap in desired ability to take time off is noted.

Figure 10: Staff Survey Interview Question # 29



Strongly Agree	27%
Agree	38%
Disagree	15%
Strongly Disagree	20%
N/A	0%

Figure 11: : Staff Survey Interview by Unit Question # 29



	Strongly Agree	Agree	Disagree	Strongly Disagree	N/A
Managers	0%	50%	50%	0%	0%
First Line Supervisors	11%	44%	33%	11%	0%
Police Officers	4%	39%	17%	39%	0%
Investigators	50%	33%	0%	17%	0%
Civilians	50%	50%	0%	0%	0%
CSO/Property Officer	100%	0%	0%	0%	0%

In 2019, the department denied leave or cancelled days off 177 times.

Vacation is an employer provided paid time off benefit that allows employees to have uninterrupted time away from work and allow themselves the opportunity to recharge.

For any position, regardless of if it is public safety, or not, there is importance to time away from work. Some of these reasons are as follows:

1. Improved productivity. When burnout starts, even the simplest of tasks becomes a challenge, and we lose some of our drive/motivation.
2. Better balance between work and personal life. When you are chronically overworked, you can start to lose your sense of self. Hobbies and interests fall to the wayside as you focus all of your energy on your career. Taking time away from work gives you a chance to revive what makes you happy.

3. Improved focus. No matter how much you love your job, doing the same thing day in and day out can wear on anyone. Taking time away gives you the chance to refocus on your goals and gain a fresh perspective.
4. Better relationships. While it is important to focus on your career, you also need to work on your relationships or the important people in your life will start feeling neglected and there is a high divorce rate among public safety.
5. Better health. Vacations work to reduce stress by removing people from the activities and environment that they associate with stress and anxiety. With the increase in awareness of suicide, mental health is a vital issue to a successful career in public safety.

When one adds the factors that law enforcement officers continuously put their lives in jeopardy and respond to stressors most citizens do not experience, ensuring they have support and time away from work is even more critical. Given the additional high level of expectations in this organization, the allowing the paid time off benefit that has been earned is even more important.

Many specific comments from staff indicated the need especially in the Patrol Division to be able to take accumulated time off. Consultants have conducted an analysis of appropriate minimum authorized staffing levels and alternative scheduling options elsewhere in this report. The recommendations made are also intended to address the impact that these factors have on the perceived morale deficiency in the police department.

Policing Model

The department policing model is service-oriented and they place a very high value on customer service. The residents and community members want and expect a high level of policing service. Due to this commitment and philosophy, the department receives great community support. The community support is positively reflected in the survey of community members.

This model is stressed and required of all department members. Department staff, through interviews, also reflect that they recognize the community support. In addition to routine contacts, the department is involved in community outreach through assisting with events such as the food pantry.

The department has a school resource officer at Glenbard West High School, and a community education officer that serves as liaison to other schools and works on special events. *Coffee with a Cop* is a regular meeting in which the department provides coffee and refreshments to anyone that wants to attend in an informal setting to discuss any topic. This event is extremely well received by the community, and the police chief is always in attendance.

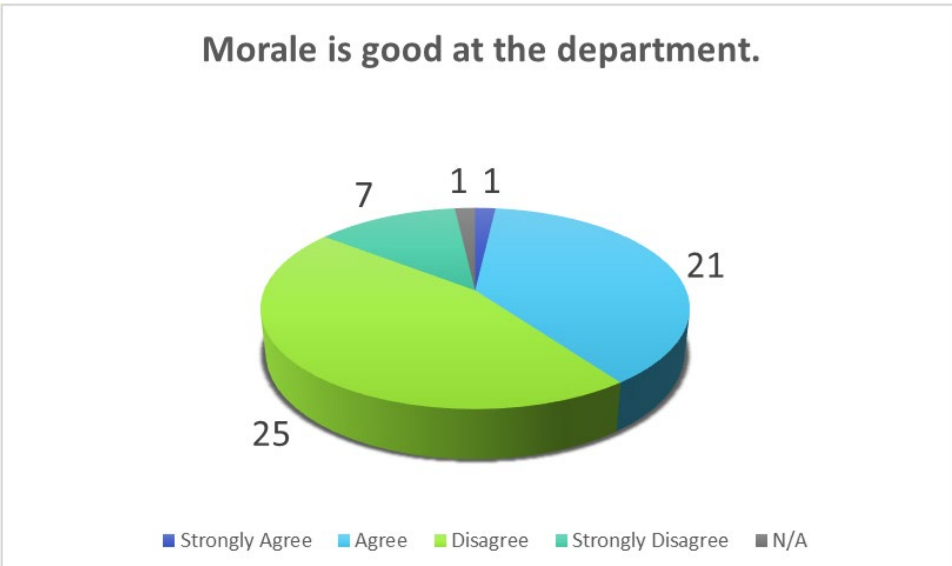
Morale

In structured interviews department personnel were asked to rank the following statement:

MORALE IS GOOD AT THE DEPARTMENT.

From the interview data analyzed, a gap in the desired morale of employees is noted as 58 percent responded they disagree or strongly disagree that morale is good.

Figure 12: Staff Survey Interview Question # 17



Strongly Agree	2%
Agree	38%
Disagree	45%
Strongly Disagree	13%
N/A	2%

Morale is the state of mind, feelings, and sense of *esprit de corps* of the individual and the organization. It is vital for a law enforcement agency to promote a positive sense of morale because positive morale can equate to improved mental and physical health and an overall good feeling about oneself. It also helps personnel cope with the tremendous stress of policing. Positive morale promotes production, effectiveness and ability to accomplish the public safety mission. Officers with high morale should experience increased positive encounters and less negative interaction with the public. In today's social climate in policing, this is needed.

Thirty-two employees indicated that morale is a concern. There are 19 employees that made specific comments during employee interviews that directly relate to this issue. In many cases, employees gave multiple reasons for the morale deficiency, so the total number of comments on specific issues totaled more than nineteen. Seventeen employees cited staffing, manpower (total officers as well as minimum staffing levels) and denial of time off requests as a major contributing factor driving low morale. This grouping is the most frequently referenced morale issue. Of the specific comments provided, 58 percent were related to staffing needs (staffing-manpower/cannot get time off, unable to attend training, forced overtime work, officers leaving, overworked). The inability to have permanent work shifts, the evaluation process, and the disciplinary process were also noted, with significantly fewer references. All other reasons were commented once, with no apparent trend. It should be noted that one employee remarked that morale has improved over the last year.

A solution to improving morale is to remove or lessen causes of low morale. As staffing is forefront as a cause, measures should be taken to modify the organizational structure and add staff where appropriate.

Recommendations

- *The department should modify the organizational structure as well as add staff. The specifics are provided in other sections of the report.* ***Priority 2***

Supervision

The importance of quality supervision cannot be understated. On an everyday basis, supervisors make routine management decisions and direct and control the actions of subordinates. The supervisory practices of an agency effect the performance, effectiveness, and efficiency of the department. To be effective, supervisors must appropriately communicate, guide, encourage, and concern themselves with the welfare on subordinates.

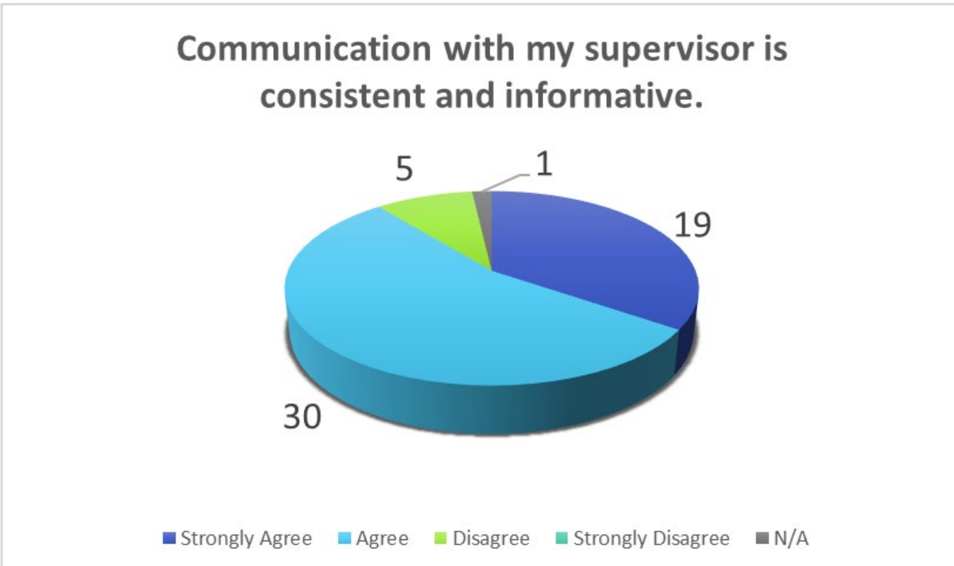
Table 2: Comparable Agencies Officer to Supervisor Ratio

Department	Population	Chief	Asst/Deputy Chief	Cmdr	Sgt.	Total Mgmt	Total Officers (FTE)	Officer/Supervisor Ratio
Carol Stream	40,000	1	2	3	7	13	56	4.31
Woodridge	32,971	1	2	0	7	10	41	4.10
Darien	21,304	1	1	0	5	7	27	3.86
Lisle	23,431	1	2	0	5	8	30	3.75
Bartlett	41,487	1	2	3	7	13	46	3.54
Bloomingdale	22,018	0	2	0	9	11	37	3.36
Batavia	26,250	1	2	4	3	10	31	3.10
Roselle	23,298	1	1	0	6	8	24	3.00
Glen Ellyn	27,714	1	1	0	8	10	30	3.33
Westmont	24,600	1	2	0	8	11	30	2.73
Geneva	21,495	1	0	2	7	10	27	2.70
La Grange	15,322	1	1	3	3	8	21.5	2.69
Lemont	17,291	1	0	2	4	7	17	2.43

In structured interviews department personnel were asked to rank the following statements:

COMMUNICATION WITH MY SUPERVISOR IS CONSISTENT AND INFORMATIVE.

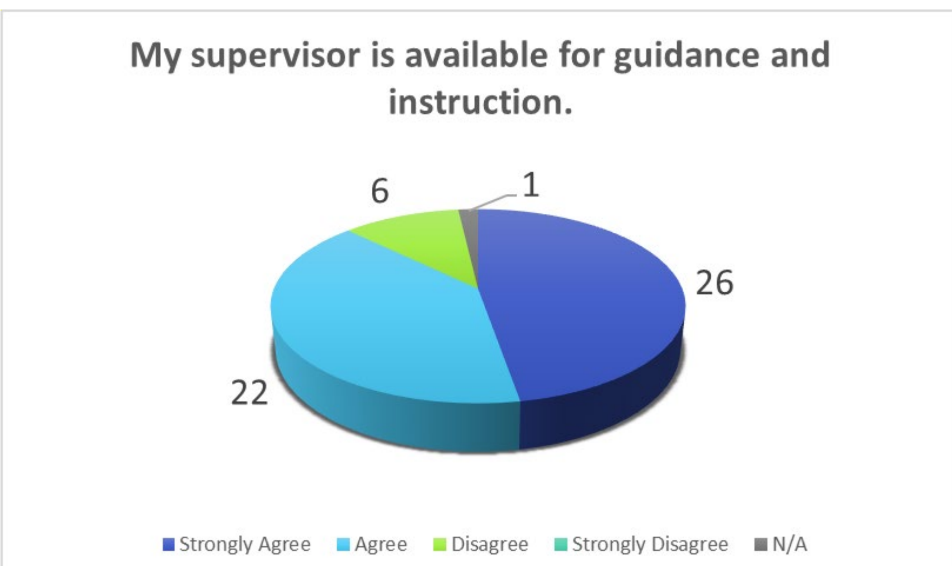
Figure 13: Staff Survey Interview Question # 25



Strongly Agree	35%
Agree	55%
Disagree	9%
Strongly Disagree	0%
N/A	2%

MY SUPERVISOR IS AVAILABLE FOR GUIDANCE AND INSTRUCTION.

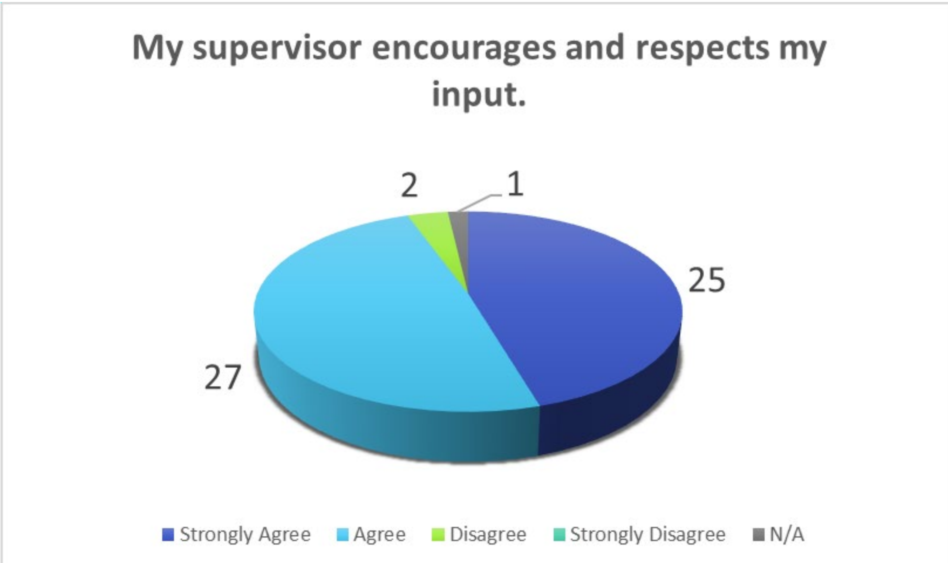
Figure 14: Staff Survey Interview Question # 26



Strongly Agree	47%
Agree	40%
Disagree	11%
Strongly Disagree	0%
N/A	2%

MY SUPERVISOR ENCOURAGES AND RESPECTS MY INPUT.

Figure 15: Staff Survey Interview Question # 27



Strongly Agree	45%
Agree	49%
Disagree	4%
Strongly Disagree	0%
N/A	2%

I BELIEVE THAT MY SUPERVISOR CONSISTENTLY EXHIBITS CONCERN FOR MY SAFETY, SUCCESS AND WELL-BEING.

Figure 16: Staff Survey Interview Question # 21

Strongly Agree	45%
Agree	49%
Disagree	2%
Strongly Disagree	2%
N/A	2%

Communication between supervisors and subordinates is very good. Responses show that 90 percent of employees feel that communication with their supervisor is consistent and informative. Furthermore, 94 percent of respondents agreed or strongly agreed with the statements; “I believe that my supervisor consistently exhibits concern for my safety, success and well-being” and “My supervisor encourages and respects my input”. The response of the employees to these statements identified above seems to indicate the significant majority of employees view the relationship between subordinates and supervisors as a supportive and positive relationship. The supervisory practices employed promote a positive and productive work environment.

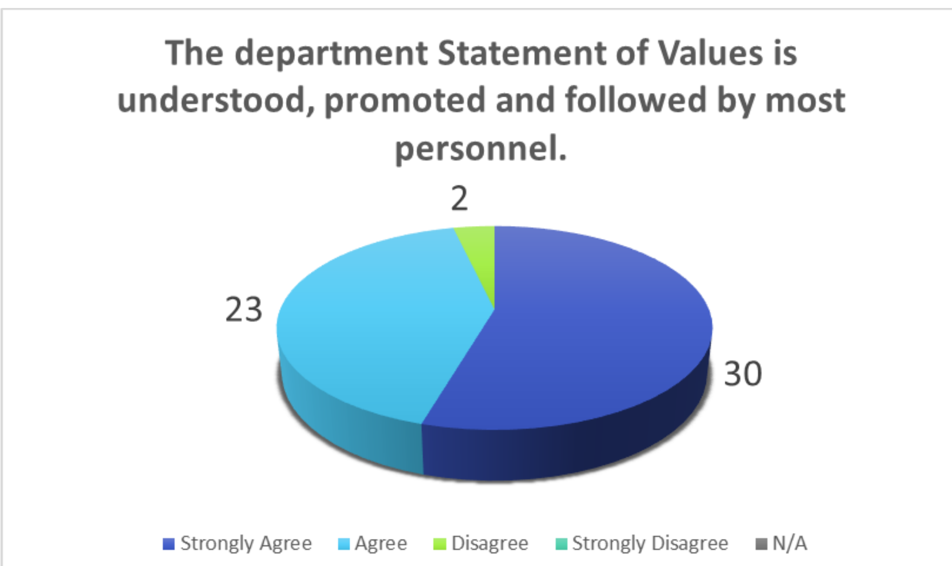
Leadership

Leaders of organizations have the responsibility of promoting positive values within the organization as well as establishing command structures and processes to complete the mission of the department. Staff must know the importance of the values of the organization as well as subordinate-supervisory relationship.

In structured interviews, department personnel were asked to rank the following statements:

THE DEPARTMENT STATEMENT OF VALUES IS UNDERSTOOD, PROMOTED AND FOLLOWED BY MOST PERSONNEL.

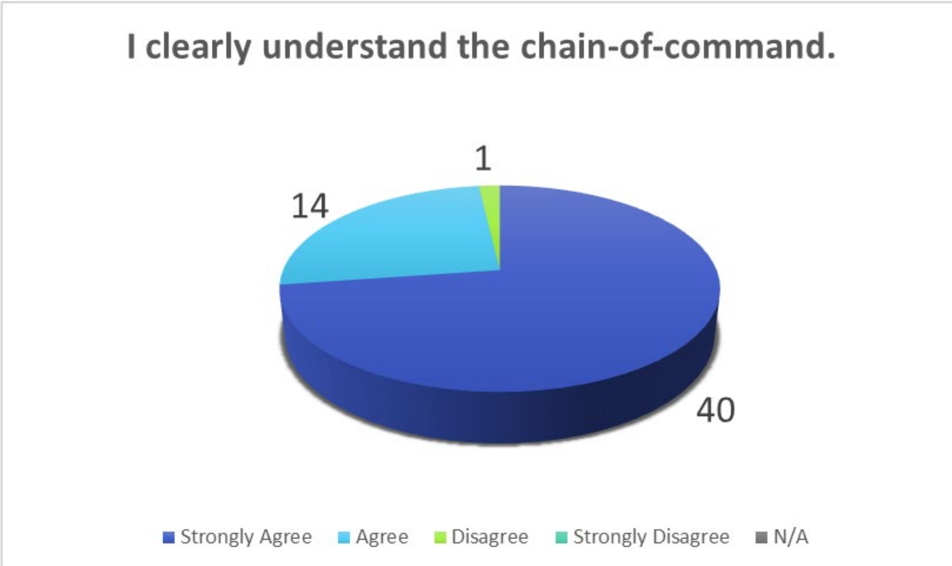
Figure 17: Staff Survey Interview Question # 3



Strongly Agree	55%
Agree	42%
Disagree	4%
Strongly Disagree	0%
N/A	0%

I CLEARLY UNDERSTAND THE CHAIN-OF-COMMAND.

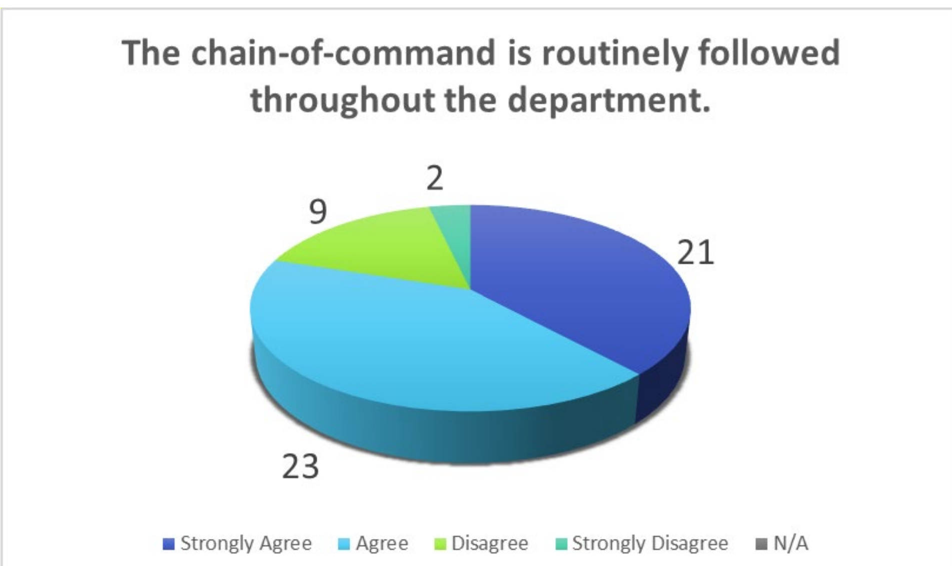
Figure 18: Staff Survey Interview Question # 7



Strongly Agree	73%
Agree	25%
Disagree	2%
Strongly Disagree	0%
N/A	0%

THE CHAIN-OF-COMMAND IS ROUTINELY FOLLOWED THROUGHOUT THE DEPARTMENT.

Figure 19: Staff Survey Interview Question # 8



Strongly Agree	38%
Agree	42%
Disagree	16%
Strongly Disagree	4%
N/A	0%

From the responses related to leadership issues it is clear the staff understands and follows the department Statement of Values, understands and routinely follow the chain-of-command. Responses show that 97 percent of employees feel that the department Statement of Values is understood and promoted by most personnel. Furthermore, 98 percent of respondents agreed or strongly agreed with the statement; "I clearly understand the chain-of-command". Although there is 20 percent disagreement with the statement; "The chain-of-command is routinely followed throughout the department", the majority, 80 percent, state that it is routinely followed. The leadership of the department has certainly set the tone for accomplishing the department mission.

POLICIES AND PROCEDURES

A critical component of managing a police department involves having an up-to-date policy and procedure manual. This manual is commonly referred to the Standard Operating Guidelines or Standard Operating Procedures. This also requires that all personnel are aware, trained, follow, and be held accountable to the procedures.

Glen Ellyn refers to this document as the Glen Ellyn PD Policy Manual. Glen Ellyn participates in the web-based Lexipol service, to address their policy needs. Lexipol states that they "provide fully developed, state-specific policies researched and written by subject matter experts and vetted by attorneys….policies are based on nationwide standards and best practices while also incorporating state and federal laws and regulations where appropriate". The Lexipol service includes policy updates generated by their staff.

The policy manual has not been fully developed by department staff. The policies provided by Lexipol need careful review to ensure they are updated and all titles, functions, and department components comply with practice. As stated in the police program coordinator's job description, the position of police program coordinator is responsible for drafting, reviewing and disseminating department policy. This includes editing raw policy drafts, identifying and mitigating draft conflicts with local ordinances, labor contracts, etc., and presenting final policy drafts to the chief of police for approval. The position has been vacant for some time and the duties were not reassigned. Therefore, the policy manual needs attention.

As stated elsewhere in this report, the consultants have provided recommendations for the revision of the organizational structure of the department and the distribution of roles and responsibilities. The duties of policy development should be placed under the direction of the Support Division when implemented. The primary responsibility should be assigned to the position of police program coordinator.

Additionally, the Illinois Governor signed House Bill 3653, a criminal justice and police reform bill, into law on February 22, 2021. This law has far reaching impact on many aspects of the operations of the police department. The bill is 764 pages in length, which is far too extensive to be analyzed and referenced in detail within this report. The consultants recommend a comprehensive review of the Glen Ellyn PD Policy Manual by department command staff and that the policy manual be amended to reflect any such changes made by the department pursuant to the consultants' recommendations and the House Bill 3653. At a minimum, it is recommended that immediate attention should be focused on the department policies that address the essential and/or high liability functions of the department, to ensure compliance with this new statute.

Current policy requires that all changes to the policy manual will be posted on the department intranet home page and it is each employee's responsibility to keep abreast of all policy revisions. A specified person is responsible for forwarding revisions of the policy manual as needed to all personnel via e-mail. Each employee is required to acknowledge receipt by return e-mail, review the revisions and seek clarification as needed. The policy further states that each division commander will ensure that members under his/her command are aware of any policy manual revision.

In today's policing environment, having a thorough book of policies and procedures is extremely important to ensure employees are acting within established standards, as well as adherence to current law. Employees who 'act' on their own initiative put not only themselves, but the village at risk. It is especially important the department have appropriate policies to address high liability activities.

Essential Department Policies
There are ten essential policies that a department must have in place which is listed in the table below. Thus, those high-liability regulations were reviewed.

Table 3: Essential Police Policies

TOP TEN ESSENTIAL POLICE POLICY TOPICS	CORRESPONDING GLEN ELLYN POLICY
Police Pursuit/Emergency Vehicle Operations	307 Officer Response to Calls 315 Vehicle Pursuits
Allegations of Misconduct	305.7 Officer-Involved Shooting or Death – Administrative Investigation 319 Conduct 1008 Personnel Complaints
Response to Reports of Missing and Endangered Persons	313 Public Alerts 317 Missing Persons
Domestic Abuse Arrests	308 Domestic Violence
Biased Based Profiling	401 Racial or Biased Based Profiling
Use of Force	300 Use of Force 302 Handcuffing and Restraints 303 Control Devices and Techniques 304 Conducted Energy Device 305 Officer-Involved Shooting and Death 306 Firearms
Search and Seizure	309 Search and Seizure 310 Temporary Custody of Juveniles 418 Detentions and Photographing Detainees 502 Vehicle Towing 600 Investigation and Prosecution 601 Asset Forfeiture 606 Sexual Assault Investigations 900 Temporary Custody of Adults 901 Custodial Searches 1008 Personnel Complaints
Harassment	312 Discriminatory Harassment
Response to Mental Illness	None
Evidence and Property Control	600.6 Computers and Digital Evidence No Chapter currently exists, but is 800 Property and Evidence Section in Lexipol

The following high liability policies were reviewed:

1. Police Pursuit/Emergency Vehicle Operations
The department maintains two policies that relate to pursuits and emergency vehicle operation. These are **Vehicle Pursuits (315)** and **Officer Response to Calls (307).** The policies reference State

Statutes related to emergency vehicle operation that establishes a requirement for the activation of both the emergency lights and sirens when responding to an emergency call and during a vehicle pursuit. The policies clearly establish a requirement for sound judgment and due regard for safety of all persons while operating an emergency vehicle. The policies also establish the responsibility of the supervisor to monitor emergency vehicle operations and to terminate an emergency response that, in his/her judgment, is inappropriate due to the circumstances.

The Vehicle Pursuit Policy has the following characteristics:

Requirement to complete an appropriate (incident) report as well as the Pursuit Driving Report. The Pursuit Driving Report is then submitted to the Illinois Law Enforcement Training and Standards Board (ILETSB).

Requirement to prepare a memorandum briefly summarizing the pursuit, to be submitted to the department manager.

Establishes when a pursuit may be initiated and should be terminated, the maximum number of vehicles involved, approved and prohibited actions, as well as the responsibilities of supervisors to oversee and manage the pursuit.

Requires training on the policy periodically and no less than annually.

The Vehicle Pursuit Policy should be reviewed periodically in detail by command staff to eliminate any contradictory language and specifically identify to whom the duties and responsibilities created by the policy are assigned.

2. Allegations of Misconduct

The department maintains three policies related to the investigation of the actions and misconduct of department members, including:

a. ***Officer-Involved Shooting or Death – Administrative Investigation (305.7)****, which delineates the requirements related to the administrative investigation of officer-involved shootings and deaths to determine conformance with departmental policy.*
b. ***Conduct (319)*** *establishes standards of conduct for all department members and lists causes for discipline.*
c. ***Personnel Complaints (1008)*** *regarding the investigation of allegations of employee misconduct.*

The Personnel Complaints Policy includes the following characteristics:

a. Requirements for how a complaint is received, investigated, and reported through the chain-of-command up to the Chief of Police.
b. Establishes classification of the types of investigations conducted as well as specific disposition classifications.

c. *Provisions for concurrent criminal investigations when conduct rises to the level of criminal activity, and a summary of the rights afforded to the accused officer for both administrative and criminal investigations.*
d. *In the interest of transparency and community relations, there is a provision for the sharing of the results of the investigation with the complainant when the investigation is completed.*
e. *Requirement for the maintenance of a log that records and tracks complaints and an annual audit of the log, culminating in a written report distributed to the Chief of Police, Village Manager and Village Attorney.*
f. *Pursuant to state statute, the policy requires notification to the Illinois Law Enforcement Training and Standards Board (ILETSB) of the final determination of discipline in specific circumstances.*

As previously stated, the recently enacted House Bill 3653 has profound impact on issues and procedures related to employee misconduct. Some sections go into effect soon, therefore is time sensitive. The statute should be reviewed, and policies should be amended to be in compliance.

3. Response to Reports of Missing and Endangered Persons

The department maintains two policies related to the response to reports of missing and endangered persons.

The department maintains a policy titled, **Public Alerts (313)** which contains guidelines on the AMBER Alert Notification Plan, which is a tool for law enforcement to promptly notify the media of a confirmed child abduction or endangered missing person so the information can be broadcast to the public for assistance in locating the child and/or abductor.

The department also has a comprehensive policy titled **Missing Persons (317)** which references numerous state statutes related to this issue. The policy has the following characteristics:

a. *Defines Missing Person and High-Risk Missing Person and provides detailed direction regarding the response to reports of missing and endangered persons, including acceptance of all missing person reports regardless of where the person was last seen, where the person resides, or any question of jurisdiction.*
b. *Establishes required actions including but not limited to immediate notification to a supervisor in high-risk cases, broadcasting alerts or notification to missing person networks, entering pertinent information into state and national databases, minimum report requirements, and dissemination of case information.*
c. *Supervisory roles and responsibilities are also addressed in the policy.*
d. *Requirements for follow up investigations are described, including but not limited to requests for additional evidentiary samples such as photographs, x-rays, DNA and fingerprints, periodic recontact with the reporting person, liaison with schools and networks managing information regarding missing and recovered unidentified persons and continued investigatory efforts.*

e. *Includes required actions when a missing person is found and case closure criteria and establishes minimum training standards for those whose duties include response to reports of missing persons.*

The policy does not have a requirement for coordinating searches, with or without a canine, in cases of high-risk missing persons. It is recommended that requirement be added to the policy.

4. Domestic Abuse Investigation and Arrests

The department maintains a comprehensive policy titled **Domestic Violence (308)**, regarding the department's response to domestic violence incidents. This policy has the following characteristics:

a. *Includes provisions for mandatory information in reports, collection of evidence, and assistance to victim(s), including summoning medical care, notification to outside service agencies and assisting the victim with obtaining an Order of Protection, if appropriate.*
b. *Provides for mandatory actions pursuant to the Illinois Domestic Violence Act.*
c. *Provides information regarding the verification and enforcement of Court Orders related to Domestic Violence.*

5. Biased Based Profiling

The department maintains a comprehensive policy titled **Racial or Biased Based Profiling (401)** that prohibits "An inappropriate reliance on factors such as race, ethnicity, national origin, religion, sex, sexual orientation, economic status, age, cultural group, disability, affiliation or affiliation with any other similar identifiable group as a factor in deciding whether to take law enforcement action or to provide service". The policy has the following characteristics:

a. *Establishes requirements for stop cards to be completed, to contain all the information required by state statute for traffic and pedestrian stops.*
b. *Includes requirements for supervisory oversight to detect and address any indications of prohibited profiling, to include the periodic, review of video camera recordings, Mobile Data Computer (MDC) data and other resources.*
c. *Establishes requirements that these review actions be documented as well as reporting of any observed incidents of prohibited conduct by any employees.*
d. *Includes provisions for annual biased-based policing training as well as the statutory required collection, analysis and sharing of data related to vehicle and pedestrian stops.*
e. *Requires the annual review of the efforts of the Department to prevent racial- or bias-based profiling and the submission of an overview report, including public concerns and complaints, to the Chief of Police.*

The Annual Report should be reviewed by the chief of police to identify any changes in training or operations that should be made to improve service.

6. Use of Force

The department maintains six policies that are related to Use of Force issues:

a. ***Use of Force General (300)*** *establishes definitions of Force and Deadly Force and when the use of deadly force is justified. The following are characteristics of the policy:*
    i. *Requires that officers only apply those pain compliance techniques for which they have successfully completed department-approved training. The policy references state statutes as it relates to the use of chokeholds and neck restraints.*
    ii. *Prohibits any use of force other than that which is reasonable to lawfully overcome resistance by a person and a Duty to Intercede when an officer observes another officer using force that is clearly beyond that which is objectively reasonable under the circumstances.*
    iii. *Establishes requirements regarding the discharge of a firearm at a moving vehicle or its occupants.*
    iv. *Establishes requirements for the provision of medical assistance for those upon whom force has been used and specifically addresses the issue of "excited delirium".*
    v. *Establishes the requirement for the prompt, complete and accurate documentation of any use of force greater than routine restraint, search, escorts, and handcuffing in an appropriate report, depending on the nature of the incident. It also requires notification to a supervisor as soon as practicable in specified circumstances and establishes supervisor responsibilities in incidents where force has been used.*
    vi. *Establishes a requirement for periodic training on the policy.*
    vii. *Requires that at least annually, the Patrol Division Commander should prepare an analysis report on use of force incidents and that the report should be submitted to the Chief of Police.*

b. ***Handcuffing and Restraints (302)*** *establishes guidelines for the use of handcuffs and other restraints during detentions and arrests. For following are characteristics of the policy:*
    i. *Provides the restriction that only members who have successfully completed Glen Ellyn Police Department-approved training on the use of restraint devices described in the policy are authorized to use these devices and describes factors to be considered when deciding whether to use any of the restraint devices.*
    ii. *Establishes specific guidelines regarding the restraint of pregnant persons and Juveniles under the age of 14.*
    iii. *Provides discretion to arresting officers, by establishing that, although recommended for most arrest situations, handcuffing is discretionary and not an absolute requirement of the Department. Officers should consider handcuffing any person they reasonably believe warrants that degree of restraint. However, officers should not conclude that in order to avoid risk every person should be handcuffed, regardless of the circumstances.*
    iv. *Establishes guidelines for the application of spit hoods, masks and socks, including the requirement for continual monitoring until the spit hood is removed.*
    v. *Provides requirements and restrictions on the use of auxiliary restraint devices, such as transport belts, waist or belly chains and leg restraints.*
    vi. *Establishes reporting requirements for the use of restraints.*

c. ***Control Devices and Techniques (303)*** *establishes guidelines for the use and maintenance of control devices that have been approved for use by the department. The Policy has the following characteristics:*
   i. *Requires that only devices issued by the department or approved by the Chief may be used and only officers who have successfully completed department-approved training in the use of any control device are authorized to carry and use the device.*
   ii. *Provides for mandatory issuance and inventory control, periodic inspection of all devices as well as the repair or replacement of deficient devices and the proper disposal of damaged, inoperative, outdated or expended control devices or munitions.*
   iii. *Addresses the use of batons and identifies restrictions for delivering strikes to specific regions of the body.*
   iv. *Addresses use of tear gas and describes when it can be used and requirements for supervisory approval before deployment.*
   v. *Addresses Oleoresin Capsicum (OC) spray and includes who shall and who may carry OC. The policy contains requirements for post exposure treatment, including medical assistance when needed. The policy establishes a requirement for notice to the owner/occupant of a vehicle or building where OC has been deployed and that the notice be documented in the appropriate report.*
   vi. *Addresses Kinetic Energy Projectile devices and establishes circumstances when the use of the device is appropriate and documents that use of the device is not mandatory in these circumstances. This section provides direction on pre-deployment considerations as well as pre-deployment warnings. The policy establishes requirements for special marking of these weapons and munitions, as well as a requirement for inspection of the devices at the beginning of each shift.*
   vii. *Establishes requirements for initial training and certification of the user as well as periodic recurrent training and recertification.*
   viii. *Establishes a requirement that all uses of control devices be reported in the related incident report and pursuant to the Use of Force Policy.*

d. ***Conducted Energy Device (304)*** *establishes guidelines for the use and maintenance of Tasers that have been approved for use by the department. The Policy has the following characteristics:*
   i. *Requires that only devices issued by the department or approved by the Chief may be used and only officers who have successfully completed department-approved training in the use of any control device are authorized to carry and use the device.*
   ii. *Establishes requirements for special marking of these weapons, as well as a requirement for inspection and testing of the devices at the beginning of each shift.*
   iii. *Provides direction on pre-deployment considerations, including when the device should not be used, as well as pre-deployment warnings.*
   iv. *Provides restrictions for targeting specific regions of the body.*
   v. *Establishes requirements for post deployment actions, including supervisory notification and collection of evidence, including photographs.*

vi. Requires mandatory medical assessment and treatment of all persons subjected to a conducted energy device.

vii. Requires detailed and comprehensive reporting on a Use of Force Report Form and an arrest/crime report.

viii. Establishes supervisor requirements, including response to the call, downloading data from the Taser device and review of the incident and all required reports.

ix. Establishes requirements for initial training and certification of the user as well as periodic recurrent training and recertification.

e. Officer-Involved Shootings and Death (305) *establishes policy and procedures, as required by state statute, for the thorough, fair and impartial investigation of an incident in which a person is injured or dies as the result of an officer-involved shooting or dies as a result of other action of an officer. The Policy has the following characteristics:*

i. Establishes that the State Attorney's Office is responsible for the criminal investigation into the circumstances of any officer-involved shooting that does not result in death and that officer-involved deaths shall be investigated by outside agency investigators as provided in the applicable intergovernmental agreements.

ii. The policy identifies considerations to be made in regard to the interviewing of officers. These issues include that GEPD officers will not directly participate in the interviews and the scheduling of interviews if any involved officer is physically, emotionally or otherwise not in a position to provide a voluntary statement and the legal rights afforded to the officers.

iii. Establishes guidelines for the timely identification and interview of other potential witnesses to the incident.

iv. Addresses issues related to preparation of reports related to the incident by involved officers and other officers.

v. Places the responsibility of coordinating investigations of related crimes on the Investigations Commander.

vi. Establishes requirements for conducting a separate internal administrative investigation of involved officers to determine conformance with department policy. The policy establishes a requirement for the involved officer to provide a blood sample for drug/alcohol testing and also provides for the rights of the officer afforded by the Uniform Peace Officers Disciplinary Act.

vii. Provides that a member of the department may be assigned to work exclusively under the direction of the legal counsel for the Department to assist in the preparation of materials deemed necessary in anticipation of potential civil litigation. All materials generated in this capacity shall be considered attorney work product and may not be used for any other purpose.

viii. Establishes guidelines for a critical incident stress debriefing and a tactical debriefing to be performed by the department when practicable.

ix. Contains direction and restrictions on release of information or statements related to officer-involved shootings or deaths occurring in Glen Ellyn and other jurisdictions.

x. Establishes guidelines for required reporting to outside agencies.

f. ***Firearms (306)*** *provides guidelines for issuing firearms, the safe and legal carrying of firearms, firearms maintenance and firearms training. The Policy has the following characteristics:*
   i. *Carrying of firearms by civilian members while on-duty is prohibited.*
   ii. *Requires that members only use firearms that are issued or approved by the Department and have been inspected by the Rangemaster and only after successfully completing required training and qualifications. The policy also restricts which holsters, tactical lights and sights may be used. Members are prohibited from carrying a personally owned secondary handgun and more than one department issued handgun while on-duty. Only department issued ammunition may be used while on-duty.*
   iii. *Establishes the responsibilities of the department rangemaster and the duty of department members to follow the directions of the rangemaster.*
   iv. *Provides guidelines and restrictions related to carrying firearms off-duty. Members must demonstrate proficiency and pass a qualification course prior to carrying a firearm off duty.*
   v. *Provides guidelines pursuant to Transportation Security Administration (TSA) rules governing law enforcement officers flying armed on commercial aircraft.*
   vi. *Establishes the style of approved patrol rifle and guidelines for when a patrol rifle may be deployed. Sworn members carrying an authorized but personally owned patrol rifle must receive written approval from the Chief of Police or designee.*
   vii. *Establishes training and qualification requirements and required actions in the event that a member fails to successfully complete training or qualifications.*
   viii. *Establishes requirements for the regular inspection, maintenance and repair of firearms and provides guidelines for the safe handling and storage of firearms.*
   ix. *Establishes requirements for destruction of animals and warning shots as well as mandatory reporting of the discharge of a firearm both on-duty and off-duty.*

7. Search and Seizure

There are ten policies that pertain to or contain references to issues of search and seizure. These policies do not contain redundant, unnecessary, or contradictory information.

a. ***Search and Seizure (309)*** *establishes guidelines for lawfully permitted searches and the protection of the suspects' rights. This Policy also includes direction related to Officers searching a person of the opposite gender.*
b. ***Temporary Custody of Juveniles (310****) establishes the legal justifications for and the lawful limitations of a Stop and Frisk during an encounter with the public.*
c. ***Detentions and Photographing Detainees (418)*** *contains direction regarding initiating and conducting Field Interviews, as well as the search and photographing of the persons. This Policy establishes that a stop and frisk is a limited protective pat down for concealed weapons or dangerous instruments and establishes reporting requirements following a stop and frisk encounter.*

*d. **Vehicle Towing (502)** contains direction relating to the safekeeping of a motor vehicle due to hazard or arrest. The policy sets forth the Department requirements pertaining to the administrative search of a vehicle designed to protect the vehicle and its contents while in police custody as well as procedures for the retrieval of property.*
*e. **Investigation and Prosecution (600)** establishes guidelines and requirements pertaining to the collection, preservation and transportation of computers and digital evidence.*
*f. **Asset Forfeiture (601)** describes the authority and procedure for the seizure, forfeiture and liquidation of property associated with designated offenses. The policy establishes requirements for the maintenance of the property, the adjudication of the forfeiture proceedings and the disposition of the seized property.*
*g. **Sexual Assault Investigations (606)** establishes guidelines and requirements for the collection, preservation and testing of biological evidence.*
*h. **Temporary Custody of Adults (900)** contains direction regarding the temporary lodging and monitoring of prisoners at the municipal lockup as well as the search of the persons and the handling of their personal property.*
*i. **Custodial Searches (901)** establishes requirements for searches of individuals in custody, including field and transportation searches, as well as care of property retained for safekeeping. The policy also establishes comprehensive requirements for strip searches and physical body cavity searches. The policy contains requirements for training of personnel related to conducting searches.*
*j. **Personnel Complaints (1008)** contains provisions for administrative searches in the police department facilities, vehicles and workspaces.*

***8.* Harassment**

Discriminatory Harassment (312) establishes the department commitment to maintaining a work environment that is free from all forms of discriminatory harassment, including sexual harassment and retaliation. The policy has the following characteristics:

a. Encourages members to promptly report such incidents, provides for an exception to the rules of chain-of-command if the reporting member is not comfortable reporting violations to the immediate supervisor and requires protection of the member from continued harassment or retaliation.
b. Requires that all complaints of discrimination or harassment be reported to the Chief of Police or Human Resources Director no later than the next business day and that allegations shall be fully documented, and promptly and thoroughly investigated.
c. Requires that the complainant and/or victim be notified in writing of the disposition of the investigation and the action taken to remedy or address the circumstances giving rise to the complaint.
d. All department members are required to complete initial training when hired and then annual refresher training on this policy.

***9.* Response to Mental Illness**

The policy manual does not contain a specific policy on response to mental illness nor are there references to this topic in the table of contents. Following a manual search, a reference to the

"Crisis Intervention Incidents Policy" was discovered in Policy 900.3.1. It does not however, comprehensively address responses to mental illness.

These topics are among the top concerns addressed in the House Bill 3653 as evident by the requirement. Effective 7/1/2021, each law enforcement agency must submit monthly reports to the Illinois State Police on any incident where a law enforcement officer was dispatched to deal with a person experiencing a mental health crisis or incident. The required report shall include the number of incidents, the level of law enforcement response and the outcome of each incident. The department needs to establish procedures for complying with these statutory reporting requirements quickly as it is a time sensitive matter. This duty should be placed under the Support Division upon reorganization of department structure.

10. Evidence and Property Control

The department does not have a policy on property and evidence control. That issue would be covered in Lexipol Chapter 8, Support Services, Section 800, Property and Evidence; but this section is omitted from the Policy Manual. Within the remaining policy manual there are 202 individual references to evidence in other chapters of the manual. Some policy sections also refer to Policy 800, Policy and Evidence.

The department should prepare and include Chapter 8, which includes a section on property and evidence, into the department manual. This should be the responsibility of the Support Division when that division is developed.

Recommendations

- *The duties of policy development should be placed under the direction of the Support Division when implemented. The primary responsibility should be assigned to the position of police program coordinator.* ***Priority 2***
- *Conduct a comprehensive review of the Policy Manual by department command staff and insure the policy manual be amended to reflect any such changes made by the department pursuant to consultants' recommendations and the House Bill 3653.* ***Priority 2***
- *The pursuit policy should be periodically reviewed in detail by command staff to eliminate any contradictory language and specifically identify to whom the duties and responsibilities created by the policy are assigned.* ***Priority 2***
- *Requirements for coordinated searches, with or without a canine, in cases of high-risk missing persons be included in the Missing Persons policy unless the supervisor makes a determination that the circumstances do not justify a search.* ***Priority 2***
- *The Annual Bias Based Profiling Report should be reviewed by the chief of police to identify any changes in training or operations that should be made to improve service.* ***Priority 2***

- *Establish procedures for complying with statutory reporting requirements for incidents involving contact with persons experiencing a mental health crisis.* ***Priority 2***
- *Reporting requirements related to contacts with persons experiencing mental health crisis should be placed under the Support Division upon reorganization of department structure.* ***Priority 2***
- *Prepare and include Chapter Eight, which includes a section on property and evidence, into the department manual. This should be the responsibility of the Support Division when that division is developed*. **Priority 2**

ADMINISTRATION

The executive leadership of the department includes the chief of police and deputy chief~~.~~ The executive leadership is responsible for setting the goals and direction of the department within the strategic vision set by the Village Board; providing leadership to influence, motivate, and encourage others to contribute toward those goals; assisting and managing subordinates, and ensuring the community receives the quality of policing service they require.

In 2018, the department eliminated one of two deputy chief positions and added the civilian position of police program coordinator. The result of reorganization vastly increased the span of control of the remaining deputy chief. The chief currently has three direct reports being the deputy chief, administrative assistant, and records supervisor. The deputy chief has nine direct reports. These subordinate positions include all four patrol sergeants, the Drug Enforcement Agency Task Force sergeant, administrative sergeant, administrative sergeant operations, and police program coordinator.

The span of control for the deputy chief is currently too large and too difficult to effectively manage. It is useful to think of span of control as narrowing progressively toward the top of the organization. Thus, a police chief has the smallest span of control. The greater the degree of authority and responsibility that exists the narrower the span of control.[i] Therefore, the deputy chief should have only a slightly larger span of control than the chief.

There are numerous difficulties with the current structure. The position is a supervisory bottleneck in which communication is problematic. Too much communication flows in both directions through this position in that the reliance on the single position to be responsible for the amount of communication needed in addition to all other assigned responsibilities is simply too great. Employee interviews revealed a gap in desired communication within the department. Employees cited that the deputy chief just has too many responsibilities. Similarly, employees expressed a general consensus that this bottleneck negatively impacts operations. It should be noted that difficulties cited are not due to the work of the deputy chief, but rather the deficiency is the structure which causes the unmanageable span of control.

Two of the patrol sergeants are assigned to 6:00 p.m. – 6:00 a.m. shifts, therefore are never present during the deputy chief's normal workday. To have direct communication with these sergeants requires the deputy chief to meet with them outside the daily schedule. The deputy chief supervises both operational as well as administrative functions.

The deputy chief reported that he also performs additional work outside the scope of his normal duties including, general cleaning of the community room, kitchenette, washrooms, removing snow, pulling weeds, and topping off water drains. This work is done by the deputy chief since often there is no one else available. It is reported that a part-time custodian was recently hired, and conditions have improved.

The survey data of 12 comparable departments shows the following:

- Seven have two deputy chiefs (58 percent)
- Six have the rank of commander between chief or deputy chief (50 percent)
- Nine have a full-time administrative assistant to the chief (75 percent)
- Four have additional full-time administrative assistants (25 percent)

The department should modify the organizational structure by creating a supervisory layer of commander between the deputy chief and subordinates. This option is recommended because it provides an additional layer within the chain of command for professional development and succession planning within the department; and this alignment provides for a more manageable span of control for the command staff departmentwide. Three commanders are recommended to oversee the divisions of patrol, investigations, and support. The deputy chief will then directly supervise those three positions. The records supervisor will be under the command of the support commander instead of the chief of police.

To staff the three commander positions it is recommended that the administrative sergeant operations and the investigation sergeant be transitioned to the rank of commander. Therefore, the third position will add a new full time equivalent (FTE). Additionally, it is recommended to add a part-time administrative assistant position reporting to the deputy chief. That position will serve the deputy chief as well as the three division commanders.

The following duties should be included in the job descriptions for the three commander positions:

Support Commander

- Community education
- Community outreach
- Records
- DuComm liaison
- Property and evidence
- Fingerprinting for schools (part-time CSO)
- Policy control and development (Police Program Coordinator)
- Emergency management (Police Program Coordinator)
- Accreditation in the future (Police Program Coordinator)
- Training
- Budgeting
- Internal affairs
- Grants
- Freedom of Information Act (FOIA)
- Social media and communications

Investigations Commander

- School resource officer
- DEA Task Force
- General investigators
- Investigative aide part-time
- Liaison to investigative related MERIT task forces
- Digital forensics
- Liaison with contracted social services

Patrol Commander

- Privatized crossing guard services liaison
- Liaison to patrol related MERIT task forces
- CSOs full and part-time
- CSO parking control
- Department equipment and fleet (vehicles, weapons, less lethal, video, body cameras)
- License plate readers

These structural modifications make the span of control appropriate as the chief will have two direct reports and the deputy chief will go from nine down to four direct reports.

Table 4: Glen Ellyn Police Department Supervisor Span of Control

POSITION	FORMER SPAN	NEW SPAN
Chief	3	2
Deputy Chief	9	4
Patrol Commander (Proposed)	N/A	4
Investigations Commander (Proposed)	N/A	7
Investigation Sergeant	5	N/A
Support Commander (Proposed)	N/A	2
Administration Sergeant Operations	9	N/A
Administrative/Support Sergeant	3	4
Sergeant Day Team 1	10	10
Sergeant Day Team 2	9	10
Sergeant Night Team 1	6	7
Sergeant Night Team 2	6	7
DEA Task Force Sergeant	0	0
Records Supervisor	9	9

The recommended organizational chart is provided in the Recommended Organizational Chart and Staffing at the end of the report encompassing all recommendations related to structure and staffing contained herein.

Recommendations

- *Modify the organizational structure by creating a supervisory layer of commander between the deputy chief and subordinates.* ***Priority 2***
- *Create the divisions of patrol, investigations, and support to be supervised by division commanders.* ***Priority 2***
- *Create the part-time position of administrative assistant to be supervised by the deputy chief.* ***Priority 2***

PATROL DIVISION

The Patrol Division comprises the largest section of the police force. Therefore, special attention must be paid to properly staff and schedule these personnel.

The current CBA requires 2,080 annual standard hours worked (80 hours per two week pay period) for each employee. Sergeants and officers assigned to the 12-hour shift schedule must reduce one work shift to eight hours during every two week pay period to avoid working 84 hours every two weeks.

Patrol is commanded by the deputy chief. Four patrol shifts are each staffed with one sergeant and six patrol officers on three shifts and seven on one shift all assigned to 12-hour shifts. The sergeants report directly to the deputy chief. The patrol shift schedule is rotated every three months from dayshift to nightshift and vice versa.

The shifts work a schedule known as the Pittman schedule in which they work six 12-hour shifts and one eight-hour shift during a two-week period. This schedule provides for a three-day weekend off for each officer every other week. The annual hours scheduled are 2,080.

Consultants utilized several methods to determine staffing needs for patrol to include per capita comparisons, minimum staffing needs, survey of comparables, and workload.

Per Capita

According to the Federal Bureau of Investigations (FBI) Uniform Crime Reports (UCR) 2019 Law Enforcement data, nationwide, for all law enforcement agencies in the U.S., the rate of sworn officers was 2.30 per thousand inhabitants. Nationwide, for law enforcement agencies in communities with a population between 25,000 and 49,999, the rate was 1.7 per thousand population. [ii] In the Midwest, for the same population, the rate was 1.5 per thousand population; however, when Illinois is specially examined, the rate was 1.73 per thousand population. [iii] The 2019 report is the most recent report released by the FBI.

To match per capita rates the following additional sworn officers are needed.

Table 5: Per Capita Officer Assessment

Region/Geographic DivIsion	Required Total Sworn	Additional Sworn Staff Needed	Officer Rate Per Thousand
Nationwide	64	24	2.3
Nationwide Population 25,000 – 49,999	47	7	1.7
Illinois 25,000 – 49,999	48	8	1.73
Midwest Population 25,000 – 49,999	42	2	1.5

According to the U.S. Department of Justice’s Community Oriented Policing Services’ *A Performance-Based Approach to Police Staffing and Allocation,* The per capita approach fails to account for environmental differences among jurisdictions. It does not incorporate service-area size, weather patterns, or physical barriers and obstacles (such as rivers, mountains, bridges, and tunnels) in determining optimum staffing levels. Furthermore, it does not account for non-crime related functions and activities, traditionally performed by police as community demographic and economic characteristics dictate. In sum, the per capita method does not consider community context for determining staffing levels. [iv]

Minimum Staffing

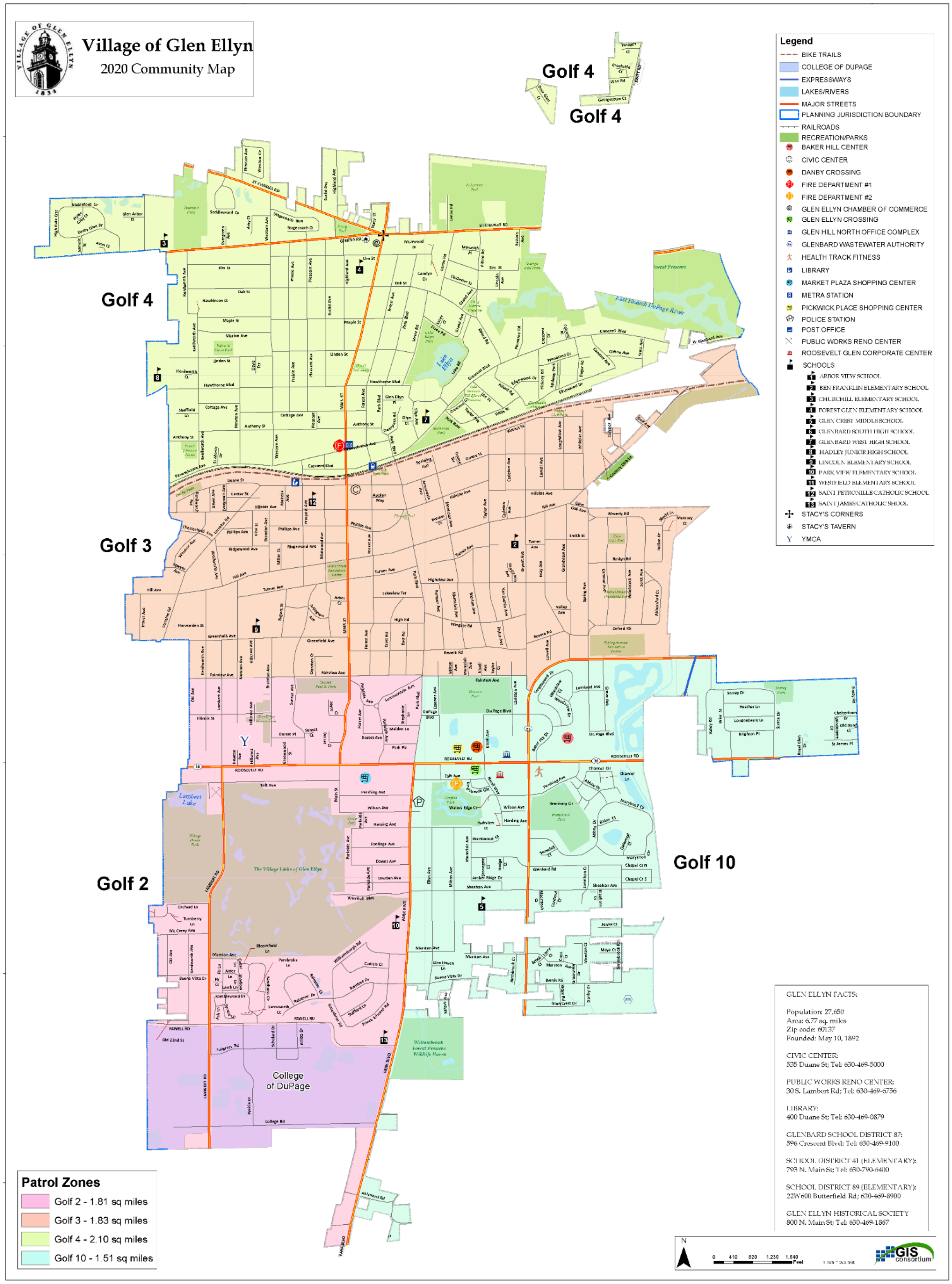
The police administration has established minimum patrol shift staffing level consists of one supervisor plus four officers for a total of five**.** If a sergeant is not scheduled to work, an officer may be assigned to work as officer in charge (OIC), in which case, the OIC would be considered the supervisor and would not be included in the officer count. Current practice is that minimum staffing is not supplemented from other sources when an officer is called out of town during a patrol shift, such as for attendance at court. In this type of occurrence, the shift would in reality operate below minimum staffing until the officer returned to his assigned patrol duties.

This approach is conducted by a police department arbitrarily determining the number of officers needed to protect the municipality while ensuring officer safety. "Policymakers in many communities believe there are a minimum number of officers needed to ensure public safety. This may be particularly common in small communities where there are relatively few citizen-generated demands for police service yet residents expect a minimum number to be on duty at all times.” [v]

Patrol utilizes four areas of coverage hereafter referred to as beats. The beats are designated as Golf 2 (south west), Golf 3 (central area between Fairview and railroad track), Golf 4 (north of railroad tracks), and Golf 10 (south east). Golf 2 is 1.81 square miles in size, Golf 3 is 1.83 square miles, Golf 4 is 2.10 square miles, and Golf 10 is 1.51 square miles. See Figure 19.

The minimum staffing level then allows for assigning one patrol officer to each beat and one supervisor to cover the entire village. When shifts have more than minimum the additional officer(s) can be scheduled to serve as back-up to primary units or be assigned special duties. Consultants find the minimum staffing level to be appropriate but should not go below minimums.

Figure 20: Glen Ellyn Beat Map



The consultants examined a four-week department schedule from November 13 to December 11, 2020. During this period, day shift minimum staffing only exceeded four patrol officers on six occasions for an entire shift while night shifts only exceeded minimum staffing once for an entire shift. On six days, one night shift officer had their hours changed in order to meet minimum staffing on both days and night shifts to avoid paying overtime. Overtime had to be used six days to meet minimum staffing (four days for four hours, one day for six hours and one for twelve hours). It should be noted that shifts go below minimum staffing in the event of officers leave the village to go with prisoners to the hospital, pick-up prisoners on warrants from other agencies, or day shift personnel attending court. To improve ability to consistently staff appropriately it is recommended that three additional patrol officers be added to the force to have seven officers assigned to each shift.

The consultants reviewed the memo dated August 9, 2019, titled "Police Department Staffing" from the police program coordinator to the chief of police. The memo states:

> **<u>Code and Policy Requirements</u>** - When police officers make an arrest, they are responsible for booking the arrestee in the temporary detention facility at the police department. This process removes the arresting officer from availability to others on patrol, typically up to two hours at a time. State of Illinois administrative code and corresponding Department Policy requires two officers to be present during the booking process specific to the search requirements. Supervisors are also required by the same Code and Policy to actively monitor the prisoner while in custody. A simple arrest can easily reduce the available workforce by 50 percent or more, due to inadequate staffing . . . Because the Department staffs with a minimal number of officers, the patrol shift is significantly *understaffed* when a custodial arrest is made.

The consultants reviewed the Illinois Administrative Code Title 20 Part 720 Municipal Jail and Lockup Standards and state statute 720 ILCS 5/103-1 Rights of Arrest and were unable to find any requirement of second officer needing to be present for searches. In fact, the consultants found that the department's policy 905 Section 1.1.d Strip Search Procedure recommending a second officer to be present is prohibited by 720 ILCS 5/103-1(e). The consultants also reviewed Policy 901 and were unable to find any routine requirement for an officer to be present for searches.

Additionally, under Title 20 Part 720.60 Supervision, it only requires:

> Persons confined shall be supervised by a jail officer or other qualified staff. For most municipalities, a radio operator on duty will suffice, provided duties do not interfere with the conduct of the following supervisory checks.

In 2017, the department moved into a new state of the art facility that includes a recorded closed-circuit television (CCTV) system of the lock-up area. The Records Section is also staffed 24 hours a day and 7 days a week.

The consultants recommend that the police administration review the practice of having a second officer being present during routine arrestee searches in lock-up as it is not required by department policy or statute. The consultants understand the officer safety aspect of having a second officer present during routine arrest searches in lock-up. The on-duty patrol supervisor could balance beat coverage versus having two officers present in lock-up for officer safety. In its place, Records Section staff could monitor officers in the lock-up area via the CCTV system when arrestees are not in their cells and are in contact with officers. In the event an officer needs assistance and is unable to notify dispatch, the records staff could alert dispatch instead.

Additionally, it is also recommended that the Records Section be required to perform prisoner checks in place of supervisors. Having the on-duty patrol supervisor be routinely responsible for prisoner checks is an inappropriate use of a supervisor. Department policy does not require it.

Finally, the consultants recommend the department should review department policy 901 for opposite sex searches and update it to include requiring officers that they be recorded on video and audio when conducting an opposite sex search when a same sex officer or another officer is not available.

Survey of Comparables

McGrath consultants distributed a staffing survey to police agencies in the surrounding region that are comparable to Glen Ellyn and received twelve responses. The average of these regional agencies' sworn personnel per thousand population is 1.64.

Table 6: Comparable Agencies Sworn Officers Per Thousand Population

Department	Population	Full-Time	Part-Time	FTE	Sworn Officers per thousand
Bloomingdale	22,018	48	0	48	2.18
La Grange	15,322	28	3	29.5	1.93
Carol Stream	40,000	69	0	69	1.73
Geneva	21,495	37	0	37	1.72
Westmont	24,600	41	0	41	1.67
Lisle	23,431	38	0	38	1.62
Darien	21,304	34	0	34	1.60
Batavia	26,250	41	0	41	1.56
Woodridge	32,971	51	0	51	1.55
Glen Ellyn	27,714	40	0	40	1.44
Bartlett	41,487	59	0	59	1.42
Lemont	17,291	22	4	24	1.39
Roselle	23,298	32	0	32	1.37

Glen Ellyn has a population of 27,714 and the police department budgeted staffing level is 40 sworn positions which provides Glen Ellyn with 1.44 sworn personnel per thousand population.

The Glen Ellyn Police Department sworn staffing rate per thousand population is below that of the average of the 12 comparable departments. To reach the average of the others, the department would need to add six sworn positions to bring total sworn staffing to 46.

The number of officers assigned to patrol was evaluated for the comparable departments. The average rate of the comparable agencies is 1.07 patrol officers per thousand assigned to the Patrol Division. Glen Ellyn comes in below the average with 0.97 patrol officers per thousand assigned to patrol. To reach the average of the others, the department would need to add three sworn positions in this function to bring total patrol staffing to 30. It is recommended that three additional officers be staffed in the patrol function.

Table 7: Comparable Agencies Patrol Officers Per Thousand Population

Department	Population	Corporal	K9 Officer	Police Officers			Patrol Officers (incl. K9s) per thousand
				Full-Time	Part-Time	FTE	
Bloomingdale	22,018	0	0	32	0	32	1.45
La Grange	15,322	3	0	15	3	16.5	1.27
Carol Stream	40,000	4	0	45	0	45	1.23
Lisle	23,431	0	0	26	0	26	1.11
Darien	21,304	0	1	22	0	22	1.08
Woodridge	32,971	0	0	35	0	35	1.06
Westmont	24,600	0	0	26	0	26	1.06
Geneva	21,495	0	0	22	0	22	1.02
Bartlett	41,487	0	1	40	0	40	0.99
Glen Ellyn	27,714	0	0	27	0	27	0.97
Roselle	23,298	0	0	22	0	22	0.94
Batavia	26,250	0	0	22	0	22	0.84
Lemont	17,291	0	0	12	4	14	0.81

Workload

Consultants reviewed the patrol workload through calls for service, Part I Crime, arrests, and traffic crashes.

To help understand the service level, the patrol calls for service were examined. Information on all service calls to the department for the previous six years are shown in the Table 8 . The calls include all 911 dispatched calls as well as self-initiated, for both patrol and CSOs. The information is presented by year, month, and beat.

Table 8: Calls for Service 2015 - 2020

Calls For Service													
2015	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	631	613	690	647	805	731	666	696	801	752	753	654	8,439
GE03	773	614	715	701	793	728	688	817	675	695	743	631	8,573
GE04	835	740	829	886	907	768	766	852	825	822	789	715	9,734
GE10	699	611	770	691	748	782	748	779	771	705	655	686	8,645
Total	2,938	2,578	3,004	2,925	3,253	3,009	2,868	3,144	3,072	2,974	2,940	2,686	35,391
2016	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	640	669	838	749	641	601	646	644	721	763	629	574	8,115
GE03	609	636	700	688	680	637	577	632	602	606	601	590	7,558
GE04	753	824	922	820	796	798	800	879	828	1,014	831	794	10,059
GE10	667	652	659	761	680	746	707	764	695	759	667	630	8,387
Total	2,669	2,781	3,119	3,018	2,797	2,782	2,730	2,919	2,846	3,142	2,728	2,588	34,119
2017	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	668	676	727	696	653	624	603	714	752	809	798	722	8,442
GE03	658	588	607	592	684	561	603	719	806	765	735	732	8,050
GE04	909	843	959	909	854	862	903	926	943	1,008	898	932	10,946
GE10	803	699	810	751	780	772	765	757	684	600	607	661	8,689
Total	3,038	2,806	3,103	2,948	2,971	2,819	2,874	3,116	3,185	3,182	3,038	3,047	36,127
2018	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	755	692	784	768	730	654	720	738	766	873	694	668	8,842
GE03	797	719	814	791	780	762	662	663	664	673	618	616	8,559
GE04	993	940	1,136	1,149	1,153	1,111	1,077	1,167	1,137	1,179	1,166	1,062	13,270
GE10	705	609	800	739	690	708	775	751	729	771	717	644	8,638
Total	3,250	2,960	3,534	3,447	3,353	3,235	3,234	3,319	3,296	3,496	3,195	2,990	39,309
2019	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	619	616	687	759	745	683	766	733	711	798	762	680	8,559
GE03	583	551	599	582	650	662	701	581	668	640	712	722	7,651
GE04	870	827	1,007	879	860	799	792	791	725	782	706	732	9,770
GE10	601	652	722	765	762	765	904	772	825	900	868	879	9,415
GEPCW*						84	165	243	183	196	203	164	1,238
Total	2,673	2,646	3,015	2,985	3,017	2,993	3,328	3,120	3,112	3,316	3,251	3,177	36,633
2020	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
GE02	680	696	573	485	511	611	656	713	715	694	741	704	7,779
GE03	646	613	492	435	506	554	728	678	531	622	604	826	7,235
GE04	744	737	750	639	674	661	873	902	848	880	828	1,121	9,657
GE10	855	783	672	698	736	708	831	709	650	690	790	788	8,910
GEPCW*	224	129	18	41	26	36	30	14	14	11	20	22	585
Total	3,149	2,958	2,505	2,298	2,453	2,570	3,118	3,016	2,758	2,897	2,983	3,461	34,166

Notes: Calls occurring outside Glen Ellyn beats were excluded from totals.
**** denotes city-wide unit, calls not associated with a beat. Began in June 2019.***

Table 9: Calls for Service Summary 2015 - 2020

Year	Calls for Service Total
2015	35,391
2016	34,119
2017	36,127
2018	39,309
2019	36,633
2020	34,166

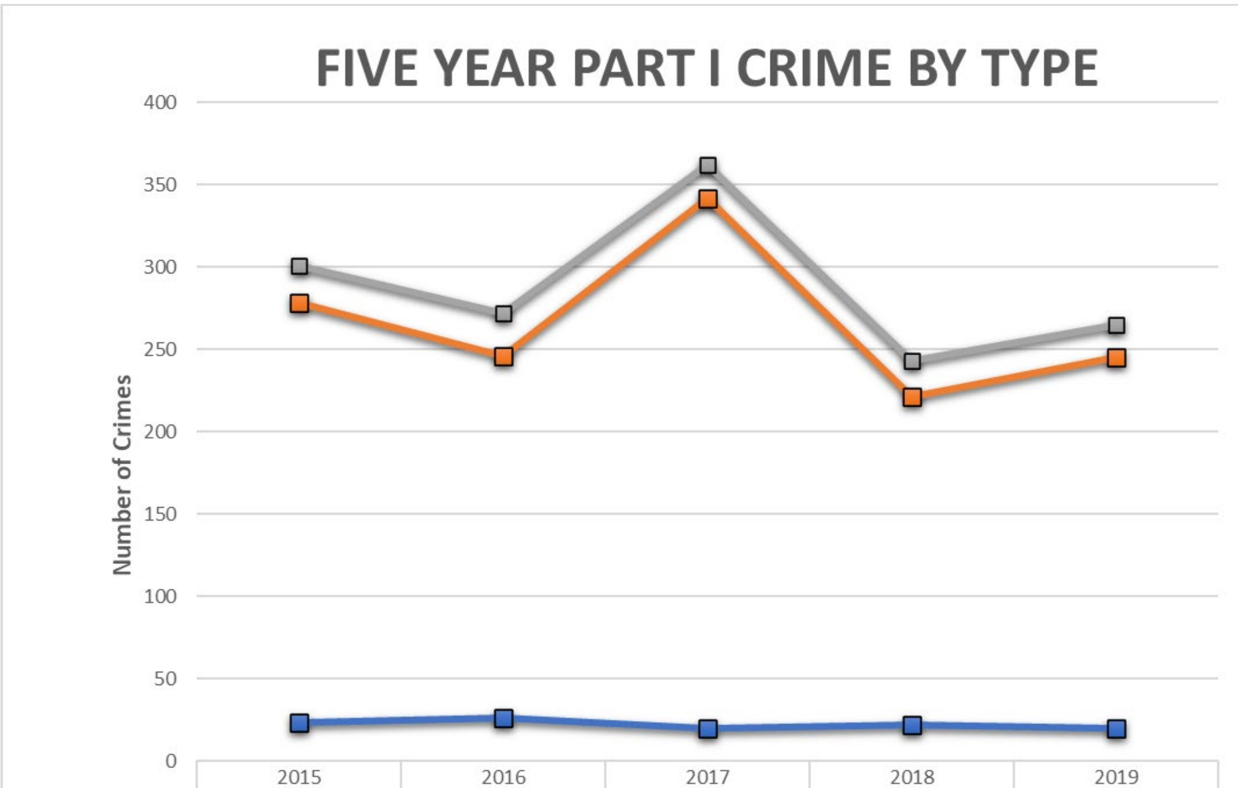
Total calls for service ranged from a high of 39,309 in 2018, to a low of 34,119 in 2016. The average calls per year over the six-year period is 35,958. With the exception of 2018 when there was a spike in volume, all other years were within a close range of 2,514 calls. The call load pattern is not showing regular annual increases; however, the community demands and expects a high level of service and involvement in special events and interaction by patrol.

Consultants reviewed Part I Crime data for five years (2020 not yet available). Part I Crimes are those reported to the Federal Bureau of Investigation and the State of Illinois Uniform Crime Reports by all Illinois police agencies. They are comprised of three types: violent crime wich include murder, rape, robbery, and aggravated assault, property crimes which include burglary, larceny, motor vehicle theft, and arson, and human trafficking which includes commercial sex acts and involuntary servitude.

Table 10: Part I Crime Data 2015 - 2019

YEAR	HOMICIDE	RAPE	ROBBERY	AGG ASSAULT	BURGLARY	LARCENY THEFT	MOTOR VEHICLE THEFT	ARSON	HUMAN TRAFFICKING - COMMERCIAL SEX ACTS	HUMAN TRAFFICKING - INVOLUNTARY SERVITUDE	TOTAL
2015	0	3	8	12	38	234	5	1	0	0	**301**
2016	1	6	6	13	35	202	7	2	0	0	**272**
2017	0	4	7	9	30	299	13	0	0	0	**362**
2018	0	9	5	8	28	179	11	3	0	0	**243**
2019	0	4	6	10	21	219	4	1	0	0	**265**

Between 2015 and 2019, Part I Crime has decreased by 12 percent. During this same five-year period, Violent Part I crime has decreased by 13 percent or three crimes (23 versus 20). Property Part I Crime has decreased by 12 percent or 33 crimes (278 versus 245). During this five-year period, the percentage of Part I Crime remained at 8 percent in 2015 and 2019 but ranged between 6 percent to 10 percent over the five-year period. The percentage of Property Part I Crime that is property remained at 92 percent in 2015 and 2019 but ranged between 90 percent to 94 percent over the five-year period.



	2015	2016	2017	2018	2019
VIOLENT	23	26	20	22	20
PROPERTY	278	246	342	221	245
TOTAL	301	272	362	243	265

There were a total of 1,143 Part I Crimes over the five-year period.

Based on the statistics, total Part I Crime decreased in 2016 from 2015 by 10 percent and increased in 2017 from 2016 by 33 percent. Total Part I Crime also decreased in 2018 from 2017 by 33 percent and increased in 2019 from 2018 by 9 percent. The 5-year average of Part I Crime offenses is 288 per year.

Crimes defined as violent crimes or crimes against the person, include murder, rape, robbery, and aggravated assault. These crimes total 111 over the five-year period. Therefore, on average, 22 of this classification of crime occurs per year. Violent crimes account for 8 percent of the total Part I offenses.

Crimes defined as property crimes, include burglary, larceny, motor vehicle theft, and arson. These crimes total 1,332 over the 5-year period. Therefore, on average, 266 of this classification of crime occurs per year. Property crimes account for 92 percent of the total Part I offenses.

Glen Ellyn's crime rate is very low compared to the nationwide crime rates per 100,000 population. The latest FBI Uniform Crime Report from 2019 shows the national property crime rate at 2,109 offenses and the violent crime rate at 366 per 100,000 population. [vi] Glen Ellyn is well below those rates at 884 property crimes and 72 violent crimes per 100,000 population.

Consultants examined Glen Ellyn's annual arrest data for the previous six years.

Table 11: All Arrests 2015 - 2020

Year	Arrest Total
2015	847
2016	879
2017	787
2018	785
2019	744
2020	576

Total arrests ranged from a high of 879 in 2016, to the lowest year of 576 in 2020. COVID-19 is assumed to have been the cause of reduced arrests in 2020. The average arrests per year over the six-year period is 769. Except for year 2020 when there was a decrease in volume, all other years were within a close range of 135 arrests. The arrest pattern shows decreasing annual arrests.

Consultants examined annual traffic crash data for the previous six years.

Table 12: All Traffic Crashes 2015 - 2020

Year	Traffic Crashes
2015	833
2016	832
2017	741
2018	771
2019	744
2020	812

Total traffic crashes ranged from a high of 833 in 2015, to the lowest year of 741 in 2017. The average number of traffic crashes per year over the six-year period is 789. Crashes do not fluctuate greatly from year-to-year. Crash numbers were within a close range of 92 crashes. The pattern is not showing increasing annual crashes.

Workload measurements of calls for service, Part I Crime, arrests, and traffic crashes do not show increasing demand over the recent six years.

An area of need in patrol is that of supervisory demand that reduces actual supervising. It was found that patrol supervisors do not have sufficient time to actively supervise officers and CSOs. The patrol sergeants are tasked with numerous administrative duties on a day-to-day basis as well as other larger collateral duties. The work of patrol supervisors is critical to the agency. Patrol makes up the majority of the agency, and patrol officers have thousands of citizen contacts every year. The actions taken by these sergeants affect their subordinates, the department as a whole, and the perceptions the public will have on the department.

As a group, the sergeants report that a majority of their time is spent handling administrative responsibilities in the police station. Rarely are they able to respond to calls with their officers except for the more serious or involved incidents. This is not a favorable situation. The officers frequently need guidance from their supervisor. It is also a best practice for the sergeant to spend significant time with officers to guide, coach, and ensure they are performing their jobs properly.

The sergeants are responsible for performing general maintenance at the police building including, but not limited to, filling floor drains, plunging clogged toilets in holding cells, cleaning the kitchenette area, the community room, and dishes from community events, setting up the community room for groups as well as trainings, taking care of the building outside grounds to include snow removal and de-icing, and maintaining the bays.

Specialized administrative duties assigned to individual patrol sergeants include supervising and conducting firearms training, serving as instructors for active threat response training for department members as well as schools and businesses in the village, managing and maintaining the armory, managing aspects of the fleet, supervising the evidence technician unit, and managing aspects of new officer recruiting and testing.

The patrol sergeants do not have sufficient time to dedicate to their primary function of actively supervising on the shift. It is recommended that the position of patrol commander be staffed to relieve some of the administrative duties of patrol sergeants to allow them more actual supervisory time.

Community Service Officers

The department staffs one full-time and one part-time community service officer (CSO) in the Patrol Division as well as a full-time parking control community service officer. There is one part-time community service officer assigned under an administrative sergeant, but that position only provides fingerprinting services and is not funded by the department.

To further examine staffing levels for this section, the comparable departments were reviewed. Ten of the departments (83 percent) employ CSOs, on average those departments have two full time CSOs. Glen Ellyn is lower than the average of full-time CSOs at one (the Glen Ellyn parking control CSO is a separate comparison). Three of the comparable departments employ part-time CSOs, either instead of full-time or in addition to.

Glen Ellyn's parking control officer focuses on downtown parking issues. That position has been equipped with an automated license plate reader which significantly helps with processing ticketing and identifying vehicles.

The two CSOs and the parking CSO provide significant support within the Patrol Division. Consultants do not recommend reducing or adding additional CSO staff.

Crossing Guards

The police department currently employs nine part-time school crossing guards to manage seven school crossings located within the village.

The crossing guards are directly supervised by the administrative sergeant, and the administrative assistant to the chief is responsible for handling day-to-day issues and substitute scheduling, onboarding and termination paperwork and payroll. In the event that crossing guard(s) are unable to perform the assigned duties on a given day, the patrol sergeant is responsible for assigning a community service officer and/or parking enforcement officer to perform the school crossing duties. The duties of the replacement personnel are covered by sworn police officers in the Patrol Division if the situation is urgent enough to require immediate attention.

The annual cost of wages for providing the services of the 10 school crossing guards for the past two school years are summarized in the tables below. The consultants reviewed the Crossing Guards Accumulators Report which showed that the hourly wage for the crossing guards during this time period ranged from $29.05 to $34.88. The average hourly wage was approximately $31.38.

Table 13: GEPD Crossing Guard Wages 2019 School Year

WAGES - Spring & Fall 2019		
Actual Hours	Actual Cost	Approximate Hourly Cost
1,197.5	$35,436.38	$29.59

Table 14: GEPD Crossing Guard Wages 2020 School Year

WAGES - Spring & Fall 2020 **COVID IMPACTED		
Actual Hours	Actual Cost	Approximate Hourly Cost
884	$26,517.24	$30.00

The costs illustrated in the tables exclude the Federal Insurance Contributions Act (FICA) employer portion, training materials, and uniforms and equipment. These costs also exclude any costs incurred by the village as a result of any on-duty injury suffered by a crossing guard during this time period. Therefore, these costs should not be interpreted as the total cost to the police department.

One emerging trend in the Chicagoland region is the outsourcing of crossing guard services. The communities that have outsourced their school crossing guard operations include Carol Stream, Hanover Park, Lombard, Westmont, Hinsdale, Elmhurst, Schaumburg, Barrington, and Cary. The private crossing guard vendor will typically recruit, train, supervise, and equip the crossing guards. The vendor will also manage the attendance of the guards, providing their own relief guards when the primary crossing guard does not report for duty. In many cases, when the municipality has transitioned to a private crossing guard vendor, the vendor has offered to hire the existing crossing guards who are qualified, in an effort to provide as seamless a transition as possible with minimal impact on operations and safety.

The transition to a private vendor generally results in a cost savings to the police department. A Chicago Tribune news article on February 25, 2020 reported on the impact of transitioning from police employees to a private contractor in Elmhurst, Illinois.[vii] Elmhurst employed approximately 25 crossing guards to cover 21 crossing locations in their city at a cost of approximately $280,000 per year. The private contractor hired many of the same crossing guards and the annual cost dropped from $280,000 to $213,000, a nearly 24 percent reduction.

A review of public information from a Village Board Meeting in Hanover Park on October 1, 2020 provides information on the hourly cost to that community for crossing guard services based on the renewal of a contract with a private vendor to be effective August 2020 through June 2022.[viii] In this community, the vendor is seeking increases in hourly rates from their current contract, which will also comply with annual increases in the Illinois Graduated Minimum Wage Program. The regular hourly rates will be $17.55 in 2020 and $18.04 to $19.10 in 2021.

Using the above Hanover Park hourly cost figures and the Glen Ellyn Police Department crossing guards actual hours worked in the most recent school year not impacted by COVID-19, the tables below provide a potential cost savings estimate for the next two school years. It should be noted that McGrath Consulting Group, Inc. is not endorsing any private service provider in these recommendations and the actual costs to the Glen Ellyn Police Department could be different if the negotiated hourly costs are different. These figures are being used solely to provide a cost savings estimate based on a nearby community's contract and experience.

Table 15: Estimated GEPD Crossing Guard Costs 2021 and 2022 School Years

School Year	Hours	Total Crossing Guard Costs	Approximate Hourly Rate	Cost Savings from 2019/2020	% Reduction from 2019/2020
2019/2020 *	1,197.50	$35,436.38	$29.59	-	-
2020/2021	1,197.50	$21,016.13	$17.55	$14,420.25	40.7%
2021/2022	1,197.50	$22,872.25	$19.10	$12,564.13	35.5%

(source GEPD Crossing Guards Accumulators Report and Hanover Park Private Company Contract)
***2019/2020 school year is actual hours, actual costs. Serves as baseline for cost savings estimates for 20/21 and 21/22 school years.**

Anticipated benefits include an estimated 40.7 percent reduction in wages only in school year 2020/2021 and an estimated 35.5 percent reduction in school year 2021/2022. Additionally, the recruitment, supervision, training, and management of the crossing guards would be the responsibility of the vendor, relieving police supervisors of these responsibilities. Other police department employees would no longer be required to divert from their primary responsibilities to cover school crossings and leave their tasks unperformed or underperformed. Additional costs which may be more difficult to quantify, such as training costs, equipment costs and future costs related to employee injuries would be transferred to the private vendor as well.

Recommendations

- *The police administration should review the practice of having a second officer being present during routine arrestee searches in lock-up.* ***Priority 2***
- *The Records Section should be required to perform prisoner checks in place of supervisors.* ***Priority 2***
- *The department should review department policy 901 for opposite sex searches and update it to include requiring officers that they be recorded on video and audio when conducting an opposite sex search when a same sex officer or another officer is not available.* ***Priority 2***
- *Transition to a private service provider of school crossing guard services.* ***Priority 2***
- *To improve ability to consistently staff appropriately it is recommended that three additional patrol officers be added to the force to have seven officers assigned to each shift.* ***Priority 2***
- *Staff the position of patrol commander to relieve some of the administrative duties of patrol sergeants to allow them more actual supervisory time.* ***Priority 2***

INVESTIGATION SECTION

In order to properly analyze the staffing needs of the Investigation Section, the consultants compared staffing levels to similar departments, reviewed required backfill of patrol, investigator caseloads, the needs of the community, and the requirements of House Bill 3653.

When comparing the actual staffing numbers of Glen Ellyn to other departments, it is reasonable to conclude that these departments may share the same or similar populations, prosecutorial conditions, and statutes. It is, however, important to recognize that even when some of the factors seem substantially similar, the expectations of the community have a major impact on the caseload of the department and Investigation Section. Some communities may be comfortable with an Investigation Section following up on only serious offenses while other communities may expect most, or all crimes reported to result in a comprehensive follow up investigation. During interviews and discussions with members of the department and community, the consultants found an expectation for the department to deliver a high level of service to the community and the department members are aware this expectation exists. Staffing availability in the Investigations Section impacts the numbers of and levels of incidences that can be assigned for follow-up.

The table below reflects the investigator staffing levels of a survey of 12 comparable police departments.

Table 16: Comparable Agencies Investigators Per Thousand Population

Department	Population	Investigator/ Detective	Investigators/Detectives per thousand
Geneva	21,495	5	0.23
Batavia	26,250	6	0.23
Bloomingdale	22,018	5	0.23
Darien	21,304	4	0.19
Woodridge	32,971	6	0.18
Carol Stream	40,000	7	0.18
Lemont	17,291	3	0.17
Lisle	23,431	4	0.17
Westmont	24,600	4	0.16
La Grange	15,322	2	0.13
Bartlett	41,487	5	0.12
Glen Ellyn	27,714	3	0.11
Roselle	23,298	2	0.09

In Table 16 the staffing level of investigators at Glen Ellyn is the second lowest rate per thousand population (note: the part-time investigative aide is not included in this calculation). The average number of investigators of the 12 comparable departments is 4.4 investigators.

In staff interviews, the consultants received comments that the expectations of the community cannot always be met because everyone is doing too much. The investigation sergeant does not utilize a formal screening system for assigning cases, but rather, assigns those that are reasonable for the section to process, cases that are less serious in nature are handled by patrol officers. Since it is reported that the current staffing model is not always able to keep up with the case workload, a formal screening system using solvability factors should be developed to guide the supervisor to determine what cases will be assigned to investigators for follow-up, based on severity of the offense as well as factors that could lead to a successful clearance.

The following table shows the number of cases assigned to investigators from 2015 through 2020.

Table 17: Total Cases Assigned 2015 - 2020

Year	Total Cases Assigned
2015	288
2016	277
2017	320
2018	256
2019	287
2020	206

The average number of cases assigned during the six-year period is 272. If 2020 is excluded, due to the impact of COVID-19, the annual average increases to 286.

The Investigation Section is assigned three investigators and one part-time investigative aide. The section sergeant assists and is assigned a small number of cases to work as the primary investigator. When possible, patrol officers are assigned to the section for very short periods of time to work cases which provide experience and enrich their policing skills.

Looking at the pre-COVID-19 average of cases assigned at 286, if those were assigned to the three investigators and one investigative aide, that would average 72 cases assigned to each. The caseload is properly managed among the investigators, this is supported by the section personnel during employee interviews. All members of the Investigation Section agreed or strongly agreed with the statement, "Work is evenly distributed amongst employees within my unit or division". Statements also included a feeling of being very understaffed. The caseload and distribution of work is manageable if the section could devote full time duties to their investigative function.

Other input indicated the investigators are often pulled from their assignment to backfill patrol for minimum staffing. In 2017, the department tracked days and hours spent by investigators being pulled from their investigative duties to backfill patrol. That year, there were 24 days served in patrol for a total of 200 hours. This amounts to five weeks spent away from their primary investigative function. Backfilling patrol was not tracked for the years 2018 through 2019 the department began tracking this information again in 2020. In 2020 there were 57 occasions when investigators backfilled patrol positions for 599 hours, or almost 15 weeks. These disruptions from their regular duties are detrimental to the ongoing investigative processes. Patrol should be staffed sufficiently so that investigators are not regularly called upon for backfill.

The Investigation Section conducts the background investigations into police applicants. This is a time-consuming process and each individual can take up to 40 hours of work due to the extensive and thorough information that must be considered. The department should consider outsourcing all aspects of the background investigation that can be performed by an appropriate vendor.

The section has been unable to do proactive investigations such as drug enforcement or other concerns, as they are staffed only to conduct follow-up on reported cases. Incidents involving vulnerable persons are forwarded to basic immediate services but there is typically not follow-up. The department does not have any specialized unit to address issues proactively as patrol is typically staffed at minimum levels.

Mental health issues, substance abuse, and homelessness were issues identified that exist within the community. These concerns can lead to increased crime and disorder and negative public safety contacts. It would be beneficial for the department to take steps to assist persons with these issues, which will have positive community effects.

It was reported by several persons during community member interviews that there are homeless persons in the village. These persons frequent the downtown area near the commuter train station as well as public facilities such as libraries.

During employee interviews, officers assigned to patrol strongly agreed (70 percent), or agreed (30 percent), for a total of 100 percent to the statement, “In my current position I frequently interact with and have contact with persons with mental health concerns”. Similarly, officers assigned to patrol strongly agreed (70 percent), or agreed (26 percent), for a total of 96 percent to the statement, “In my current position I frequently interact with and have contact with persons with substance abuse concerns”.

Like much of the country, the village is facing problems with opioids and other drugs. In Glen Ellyn, police officers administered the life-saving medicine Narcan for drug overdoses on seven incidents in 2017, six incidents in 2018, 11 incidents in 2019, nine incidents in 2020, and as of mid-April 2021, seven times.

The recently enacted House Bill 3653 imposes requirements on law enforcement agencies related to mental health issues including the following:

- Effective July 1, 2021, all incidents in which a law enforcement officer was dispatched to deal with a mental health crisis or incident must be tracked. Monthly, a report must be submitted to the Illinois State Police, including the number of incidents, the level of law enforcement response, and the outcome of each incident.
- Required annual crisis intervention training for officers.
- Required annual officer wellness and mental health training.

Due to the social concerns and requirements of new legislation cited, consultants recommend the department create the additional position of mental health and community engagement investigator and place within the new Investigations Division.

The duties of this position are described as follows. When on duty and available respond to all calls involving drug overdoses, homeless issues, mental health problems, or persons in crisis. Work the case from beginning to end. Provide referrals to persons in crisis to appropriate social agencies. Design and implement unique response strategies to combat substance abuse. Provide for appropriate service resource referrals for crime victims and offenders as appropriate. Work in cooperation with mental health providers in cases of drug overdoses.

In addition to the operational duties of the position, this detective will serve as the department subject matter expert and trainer related to mental health issues, crisis intervention, and substance abuse. As a trainer, the investigator should become certified in Crisis Intervention Training and provide that training to all officers and appropriate civilian positions, as well as training in other mental health matters, to include the training required by House Bill 3653. The position will provide the required reports to the Illinois State Police related to mental health crisis calls. Additionally, the investigator could speak to appropriate community groups regarding mental health issues affecting the village.

Issues to be included in the job description for mental health and community engagement investigator:

- Conduct proactive investigations into issues effecting the village, to include but not be limited to drugs.
- Respond to calls involving persons experiencing mental health crisis.
- Provide information and referrals to persons on issues including, but not limited to homelessness, substance abuse, basic needs such as food, clothing, and shelter.
- Serve as liaison to any contracted social service providers.

- Submit all required reports related to mental health issues to the proper agency as required by House Bill 3653.
- Provide required annual training to department personnel on crisis intervention and officer wellness and health.
- Train in the use of Narcan.
- Serve as liaison with appropriate community groups.

Recommendations

- *A formal screening system using solvability factors should be developed to guide the supervisor to determine what cases are assigned to investigators for follow-up.* ***Priority 3***
- *The department should consider outsourcing all aspects of the background investigation that can be performed by an appropriate vendor.* ***Priority 3***
- *Patrol should be staffed sufficiently so that investigators are not regularly called upon for backfill.* ***Priority 2***
- *Create the additional position of mental health and community engagement investigator and place within the new Investigations Division.* ***Priority 2***

Other Specialized Assignments

The department has seconded a sergeant to serve with the Drug Enforcement Agency Task Force. This position is also a canine unit. The major role of this position is drug interdiction at Chicago area mass transport centers.

It is not typical for a supervisor to serve as a canine unit. When this position was filled at DEA the sergeant was the rank of patrol officer and had the canine. Subsequently, this officer was successful in being promoted. The police administration made the decision to have the sergeant remain at the task force for several reasons. The team of sergeant and canine have developed significant experience and expertise with the task force work. These skills are best utilized with the interdiction efforts at the transport centers. The village authorized the department to add this supervisory position to the ranks while the assignment at DEA continues, thereby increasing from seven sergeants to eight.

Through equitable sharing with participating police agencies, the department receives significant revenues. The following table provides totals for monies seized and distributed. The amount received column shows the actual amount the department received. As there is a lag in seizure to disbursement, monies from 2020 have not yet been received. The outstanding column shows monies still owed to the department from each year.

The revenue from this position is substantial, as much as $378,829 was garnered by the department in 2015. These revenues are required to be used for law enforcement funding purposes. As noted in other sections of this report the department has vastly improved equipment and technology using these funds, as well as applying some monies toward the new police building. If the sergeant were to be removed from the task force and return to patrol or other duties the rank would be reduced to the position of officer.

Furthermore, if the sergeant left the task force, the department would not be able to send another replacement, as there is a substantial waiting list of departments wanting to send personnel. Therefore, the revenues would cease.

Due to the expertise of the position, as well as the revenue stream, consultants concur this position should remain at the task force.

Table 18: GEPD DEA Task Force Revenue 2012 - 2020

GEPD DEA Task Force Revenue Datasheet 2012 - 2020					
Year	**Equitable Sharing Amt**	**(AR) Outstanding**	**Amount Received**	**Delta**	**Delta % Of Equitable Sharing**
2012	$337,761.14	$2,800.18	$290,547.07	$44,413.89	13.1495%
2013	$340,844.95	Complete	$269,867.63	$70,977.32	20.8239%
2014	$366,336.41	$1,800.00	$258,670.12	$105,866.29	28.8987%
2015	$528,863.03	$4,250.42	$378,829.29	$145,783.32	27.5654%
2016	$413,310.63	$5,524.85	$313,757.47	$94,028.31	22.7500%
2017	$629,898.72	$78,060.58	$352,065.07	$199,773.07	31.7151%
2018	$531,583.39	$247,322.99	$216,369.75	$67,890.65	12.7714%
2019	$648,456.93	$547,277.80	$90,614.02	$10,565.11	1.6293%
2020	$496,494.66	$496,494.66	$0.00	$0.00	0.0000%
Total 2017-2020	$2,306,433.70	$1,369,156.03	$659,048.84	$278,228.83	
Annual Average 2017-2020	$576,608.43	$342,289.01	$164,762.21	$69,557.21	
Total Since Inception	$4,293,549.86	$1,383,531.48	$2,170,720.42	$739,297.96	
Annual Avg Since Inception	$477,061.10	$172,941.44	$241,191.16	$82,144.22	

Mutual Aid Agreements

The department is a member of and utilizes the services of the Metropolitan Emergency Response and Investigative Team (MERIT). This entity is a county-wide task force that is tasked with leading investigations of serious crimes, critical incidents, and other law enforcement matters. MERIT is a consolidation of law enforcement specialty teams including Felony Investigative Assistance Team (FIAT), Incident Management Assistance Team (IMAT), Major Crash Reconstruction Team (DuCART), the DuPage County Major Crimes Task Force, and the DuPage County Special Weapons and Tactics (SWAT) Team. MERIT consists of ten components, namely SWAT, Crisis Negotiation Team, Canine Response Unit, Incident Management Assistance Team, Planned Events, Major Crash Reconstruction Team, Major Crimes Unit, Public Integrity Team, Forensics Investigation Unit, and a Digital Forensics Unit.

Department officers serve on the teams when needed as a collateral duty. By being a member, the department can call for services when needed. By sharing resources, MERIT serves as a force multiplier to handle the rare events that require skills, expertise, personnel, and equipment beyond the capacity of the department.

SUPPORT DIVISION

Training

It is vital that police departments provide staff with required and appropriate training. Well trained employees know what is expected of them and how to do their jobs. Furthermore, police agencies have an affirmative duty to train adequately and correctly.

The department maintains a written policy that generally seeks to provide training "within the confines of funding, requirements of a given assignment, staffing levels, and legal mandates." The department also prefers courses that promote professional growth and continued development for department personnel; and the that courses are certified by the Illinois Law Enforcement Training and Standards Board (ILETSB); and offered by ILETSB designated Mobile Team Units (MTUs) or by other outside vendors and agencies.

The following are additional characteristics of the Training Policy:

a. *It is the responsibility of the police program coordinator to develop, review, update and maintain a training plan and to ensure that mandated basic, in-service and department-required training is completed by all members as needed or required.*
b. *The training plan should include the anticipated costs associated with each type of training, including attendee salaries and backfill costs. The plan should include a systematic and detailed method for recording and logging of all training for all members.*
c. *The training plan will include information on curriculum, training material, training facilities and scheduling. The plan will address federal, state and department-required, minimum-mandated training of officers and other members.*
d. *While updates and revisions may be made to any portion of the training plan at any time it is deemed necessary, the police program coordinator shall review the entire training plan on an annual basis.*
e. *The Training Sergeant (collateral duty of the Administrative Sergeant position) is required to coordinate an annual training-needs assessment of the Department. The needs assessment will be reviewed by command staff. Upon approval by the command staff, the needs assessment will form the basis for the training plan for the fiscal year.*
f. *Although the police program coordinator has primary training responsibility, the administrative sergeant has related duties, and other persons in the department have collateral duties.*

There are some parts of the policy that need further development, which includes:

a. *The policy has a specific section that identifies training mandated by state statutes but does not identify training identified by federal law, including but not limited to Personal Protective Equipment Respirators, Communicable Diseases and Strip Searches.*
b. *The language throughout the training policy includes references to "all personnel, all members", etc., however the focus of specific training included in the policy seems to be limited to sworn department members. For example, Section 203.4.1 specifies State mandated training, to include use of force and legal update training. This training plan does not include state mandated periodic training for Full Access LEADS certified employees, such as records personnel.*

The primary function of training should be under the command of the Support Division commander who will oversee the police program coordinator and support sergeant, formerly administrative sergeant, upon reorganizing the organizational chart. Collateral duties can stay with others in the department as is current.

In order to assess training needs, the department has a training committee comprised of at least three members. Since the program coordinator position was frozen, the training committee is currently inactive. The policy states that the senior ranking member of the committee acts as chairperson. The policy does not state that the police program coordinator is on the committee, but the policy gives that position the authority to remove or replace members. The committee would better serve the department's training needs by expanding the committee to a cross section of the department by rank, civilian and sworn, and divisions. The commander of the Support Division should be assigned as the chairperson, and the police program coordinator should be a mandatory member. The reporting requirements listed from House Bill 3653 will require additional clerical support. It is recommended a part-time administrative assistant be assigned under the supervision of the deputy chief. This position will be given responsibilities to assist with the clerical duties of the training function.

The consultants recommend the department monitor the progress of Illinois House Bill 3653. The current trend toward police reform legislation such as Illinois House Bill 3653, significantly raises the liability for departments, staff, and municipalities as it relates to the training of police department employees. Failure to provide required proof of training will result in the decertification of the officer.

House Bill 3653 enhances many requirements on Illinois law enforcement agencies. The following is an overview of the requirements of this law related to the police training function.

- *If department receives funding for deflection under 5 ILCS 820/35, at least one first responder needs to be trained in:*
  - *Neuroscience of Addiction for Law Enforcement*
  - *Medication-Assisted Treatment*
  - *Criminogenic Risk-Need for Health and Safety*

- *Why Drug Treatment Works*
- *Eliminating Stigma for People with Substance-Use*
- *Disorders and Mental Health*
- *Avoiding Racial Bias in Deflection Program*
- *Promotion Racial and Gender Equity in Deflection*

- *Annual Crisis Intervention Training*
- *Annual Officer Wellness & Mental Health training*
- *Adds additional mandatory training:*
  - *30 hours of training every 3 years*
    - *At least 12 hours hands-on, scenario-based role-playing*
    - *At least 6 hours of instruction on use of force techniques, including the use of de-escalation techniques to prevent or reduce the need for force whenever safe and feasible*
    - *Specific training on the law concerning stops searches, and the use of force under the Fourth Amendment*
    - *At least 6 hours of training focused on high-risk traffic stops*
- *Body cameras must be implemented for towns under 50,000 population agencies by 1/1/2025. Personnel will need to be trained on the use and maintenance of the equipment, as well as the maintenance of the recordings, database and department response to requests for recordings.*
- *Adds requirement that each employing government agency shall allow and provide an opportunity for a law enforcement officer to complete the mandated requirements of the Police Training Act.*
  - *Starting on 1/30/2023, every three years, officers have to submit a compliance form for completing mandated training requirements. (Officers with last names A-G)*
  - *Starting on 1/30/2024, every three years, officers have to submit a compliance form for completing mandated training requirements. (Officers with last names H-O)*
  - *Starting on 1/30/2025, every three years, officers have to submit a compliance form for completing mandated training requirements. (Officers with last names P-Z)*
  - *Board will send notice on 10/1 of the prior year to the officers.*
  - *Board will notify officers by 3/1 of the reporting year who failed to submit a compliance form.*
  - *Officers have until 4/1, otherwise, certification can be made inactive.*
- *Officers have to maintain sufficient documentation of mandatory training records for four years after the end of each reporting period.*
- *Department have to maintain sufficient documentation of mandatory training records for the relevant time periods.*

Staffing and filling patrol shifts has been identified as a factor that has negatively impacted the ability of the department to deliver required training to department staff. There have been occurrences when training has been scheduled and the staff was unable to attend due to manpower issues. Specifically, in 2019, 122 days of training were cancelled, totaling 976 hours of training, due to staffing shortages. In the months of January through March 2020, 55 days of training was cancelled, totaling 440 hours of training. These hours and days were originally scheduled with the North East Multi-Regional Training organization (NEMRT), of which the department is a member, for the first quarter of the year. No further training was scheduled with NEMRT for the remainder of the year due to the pandemic. Other training was provided in-house or through online sources.

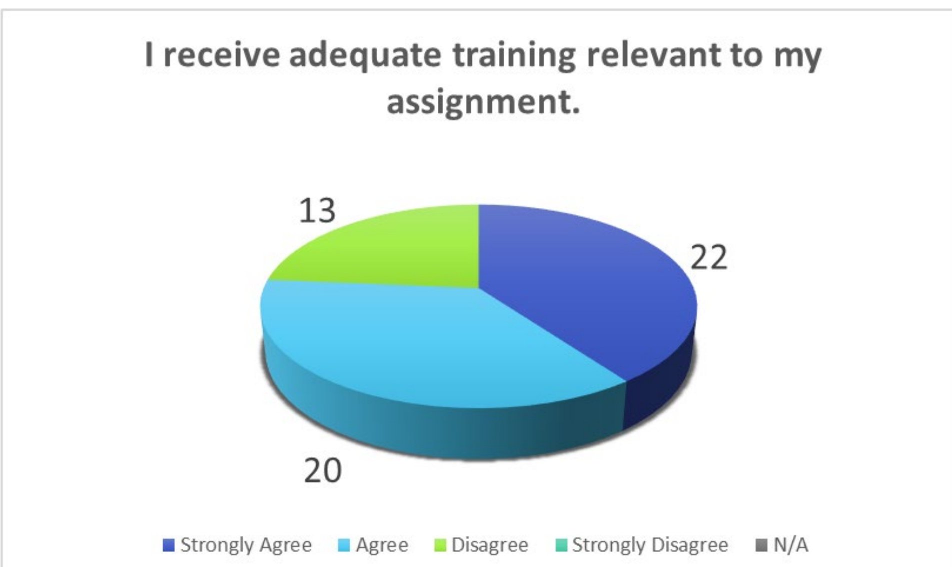
Training of recruit officers in the field training program is difficult due to staffing. The field training program is 18 weeks. Nine patrol officers are trained and perform the duties of field training officer. The department can train up to three recruits concurrently and four recruits for short durations.

Overall, the department has proper training plans and policies in place, but due to staffing shortages, has had difficulties providing training. Additional recommendations for staffing in other sections of the report should alleviate this problem and allow for proper training.

In structured interviews department personnel were asked to rank the following statement:

I RECEIVE ADEQUATE TRAINING RELEVANT TO MY ASSIGNMENT.

Figure 21: Staff Survey Interview Question # 4

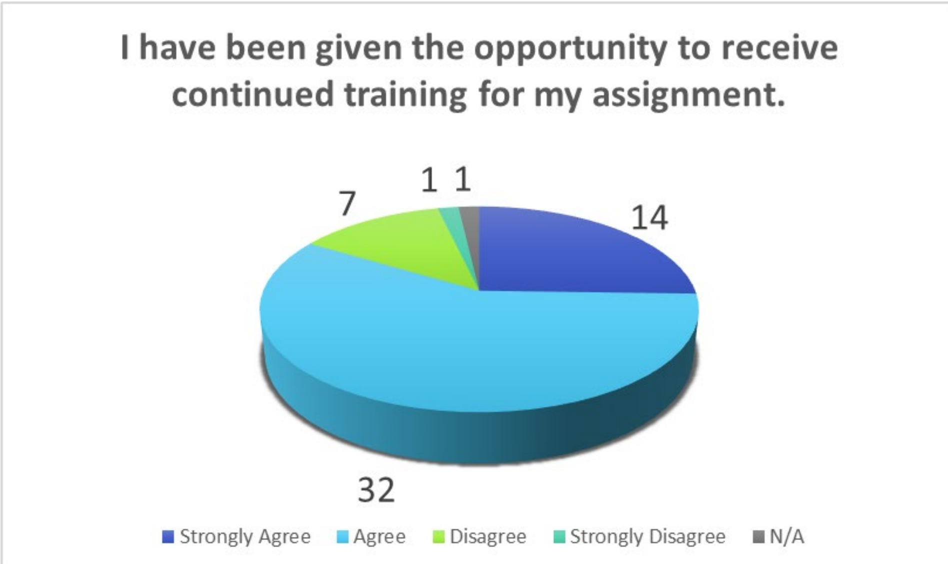


Strongly Agree	40%
Agree	36%
Disagree	24%
Strongly Disagree	0%
N/A	0%

In structured interviews department personnel were asked to rank the following statement:

I HAVE BEEN GIVEN THE OPPORTUNITY TO RECEIVE CONTINUED TRAINING FOR MY ASSIGNMENT.

Figure 22: Staff Survey Interview Question # 5



Strongly Agree	25%
Agree	58%
Disagree	13%
Strongly Disagree	2%
N/A	2%

Forty-six of fifty-five, or 83 percent, of employees agreed or strongly agreed with the statement, "I have been given the opportunity to receive continued training for my assignment". Seven disagreed and one strongly disagreed.

Recommendations

- *The primary function of training should be under the command of the Support Division commander who will oversee the police program coordinator and support sergeant upon reorganizing the organizational chart.* ***Priority 3***
- *The police program coordinator should be staffed.* ***Priority 2***
- *A part-time administrative assistant should be staffed and assigned under the supervision of the deputy chief. Duties of this position will include responsibilities to assist with the clerical duties of the training function.* ***Priority 2***
- *The training committee should expand membership to a cross section of the department by rank, civilian and sworn, and divisions.* ***Priority 3***
- *The commander of the Support Division should be assigned as the chairperson of the training committee and the police program coordinator should be a mandatory member.* ***Priority 3***
- *The training plan and mandated training section of the policy should be amended to emphasize training for all members of the department, not limited to sworn members.* ***Priority 3***

- *The mandated training section of the policy should be amended to add training required by Federal law as well as department and village policies, rules and regulations.* ***Priority 3***

Property and Evidence
According to the International Association for Property & Evidence:

> To prevent a perceived conflict of interest, as it pertains to the disposition of property or evidence, the property unit should be placed organizationally in a neutral arena, such as a Services or Administration Division… Law enforcement agencies recognize the fact that managers hold some elements of formal and informal control over the supervisors reporting to them. The supervisors, in turn, have the same influences over their subordinates. The property unit's organizational placement can greatly impact its independence and credibility. The property unit should be organizationally separate from patrol and investigation functions. Patrol personnel generally seize and book most property/evidence, while investigating officers are generally responsible for the authorization to release property or evidence. Placing the property unit in a neutral arena between those two functions enhances accountability. The responsibility of the property unit personnel is to maintain custody and documentation, not to be involved in the collection or decision making. If possible, the property unit should be organizationally placed in an Administrative or Support Services Division. [ix]

The property and evidence responsibility is under the supervision of the administrative sergeant. The consultants would like to commend the department for using this best practice of the organizational placement of this function. A full-time civilian property officer has primary responsibility for all department evidence and property held. In the absence of the property officer, the administrative sergeant can retrieve property for court, crime lab, or other matters.

The department has not prepared nor issued the Lexipol chapter on property and evidence. This chapter should be completed and issued. This issue is covered in more detail and with recommendations in the report section on Policies and Procedures.

Accreditation
The department is not accredited by either of the accrediting bodies relevant to Illinois law enforcement agencies. The two programs offering accreditation include the Commission on Accreditation for Law Enforcement Agencies (CALEA) and the Illinois Law Enforcement Accreditation Program (ILEAP). Both programs require the department to meet a set of standards of police service to achieve accreditation status. Accreditation through either program would identify that the agency meets a high set of standards representing a level of quality service. Meeting standards can assist with overall management as well as serve as a check on appropriate policies and procedures.

The Illinois Law Enforcement Accreditation Program divides standards into four general subject areas: Administration, Operations, Personnel, and Training. All are mandatory except for those that are not applicable by function.

- Tier One has 67 standards
- Tier Two has 180 standards

The cost of accreditation requires an annual fee of $400 for Tier One accreditation (a total of $1,600 every four years) or $800 annually for Tier Two accreditation (a total of $3,200 every four years).

Accreditation by CALEA is more in-depth as well as costly. Fees are based on number of full-time sworn and civilian employees. For Glen Ellyn, the initial fees would be an estimated $11,450. Annual fees thereafter are estimated at $4,065.

Under the previous White House Administration, there was discussion that future funding could be dependent upon accreditation status. A 2020 Presidential Executive Order stated in part; "The Attorney General shall, as appropriate and consistent with applicable law, allocate Department of Justice discretionary grant funding only to those State and local law enforcement agencies that have sought or are in the process of seeking appropriate credentials from a reputable independent credentialing body certified by the Attorney General." [x] At this time, the intentions of the current administration regarding accreditation is not known but is something the village should monitor.

The consultants support accreditation, but the department should not engage in the process immediately. Following significant implementation of recommendations contained in this report, the administration should consider accreditation. It is recommended the first step be Illinois Tier One. The accreditation responsibilities, if implemented, should be assigned to the position of police program coordinator.

Recommendations

- *Following significant implementation of recommendations contained in this report, the administration should consider accreditation.* ***Priority 3***
- *If accreditation is to be pursued in the future, the first step is to pursue ILEAP Tier One accreditation.* ***Priority 3***
- *Accreditation responsibilities, if implemented, should be assigned to the position of police program coordinator.* ***Priority 3***

Social Worker Unit

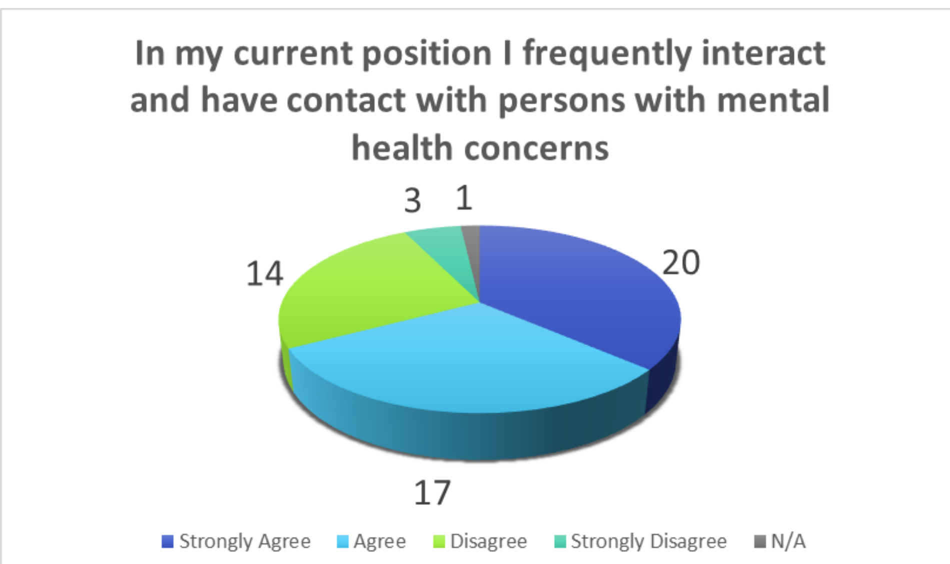
Some of the issues driving the national trend demanding police reform can be traced to the manner in which police officers interact with and use force against individuals who are experiencing substance abuse or mental health issues. The public's expectations of a police officer's ability to recognize signs of substance abuse or mental health issues during a volatile and quickly evolving encounter and the ability to engage in de-escalation strategies is higher than ever. In response, many police departments across the nation are engaging in crisis intervention strategies for their personnel.

It is reasonable for the police department to provide resources or referrals to individuals with substance abuse or mental health concerns to follow up on, to help reduce the likelihood of future incidents. In order to address this expectation, some police departments employ licensed social workers or engage in a partnership with an outside agency to meet these needs. Glen Ellyn does not currently staff a social worker position.

In structured interviews department personnel were asked to rank the following statements:

IN MY CURRENT POSITION I FREQUENTLY INTERACT AND HAVE CONTACT WITH PERSONS WITH MENTAL HEALTH CONCERNS.

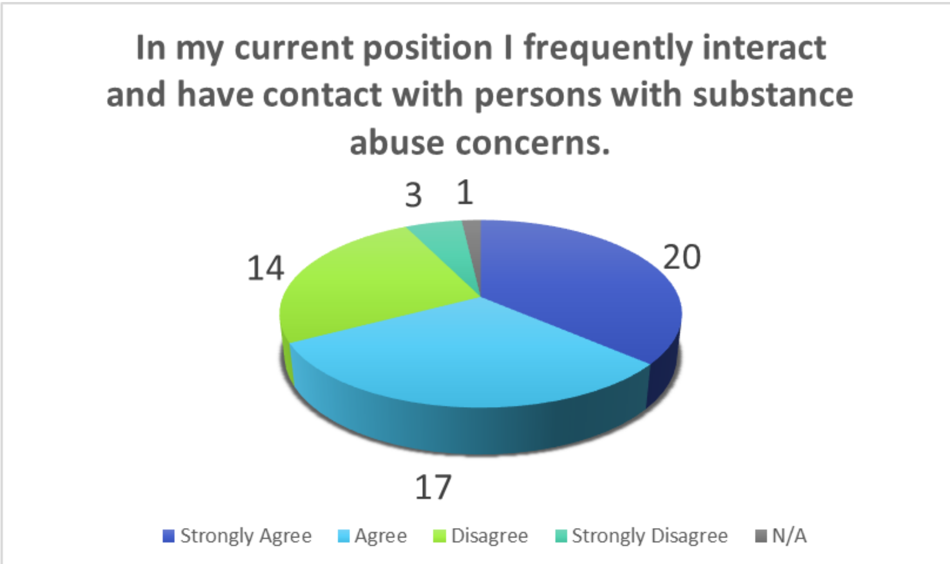
Figure 23: Staff Survey Interview Question # 38



Strongly Agree	36%
Agree	31%
Disagree	25%
Strongly Disagree	5%
N/A	2%

IN MY CURRENT POSITION I FREQUENTLY INTERACT AND HAVE CONTACT WITH PERSONS WITH SUBSTANCE ABUSE CONCERNS.

Figure 24: Staff Survey Interview Question # 39



Strongly Agree	36%
Agree	31%
Disagree	25%
Strongly Disagree	5%
N/A	2%

Staff responses show that contact and interaction with persons with mental health and substance abuse concerns are frequent. Thirty-seven police department employees agreed or strongly agreed to the statement, "In my current position I frequently interact and have contact with persons with mental health concerns", as well as "In my current position I frequently interact with persons with substance abuse concerns".

There are specific comments from employees that directly relate to these issues. Concern was expressed that there is no department follow up after the initial contact with the individuals with mental health concerns. The need for more active crisis intervention staff within the department was also identified. It was also pointed out that the Records Section is a 24-hour operation and they interacted with and have contact with persons with mental health concerns.

The community members, elected officials, and department heads interviewed provided comments regarding the frequency of encountering persons with substance abuse issues and mental health concerns in the downtown area, train depot, and public buildings, such as the public library. Four of these respondents expressed the desire for the police department to increase walk throughs and foot patrols in these areas to establish a more obvious police presence.

The survey of comparable police departments showed that three agencies contract for social services and one department has three full-time social workers as employees of the department. This equates to 25 percent of the comparable departments providing social services.

It is recommended the department engage in a shared agreement with other area police agencies to contract for social service needs. This should begin by discussing this concept with other area departments for collaboration opportunities.

Recommendations

- *Explore engaging with other area police departments to share contracting for social service needs.* ***Priority 2***

Internal Affairs

Internal Affairs procedures are provided in Policy 1008, Personnel Complaints. For most complaints, the immediate supervisor is tasked with the investigation. Upon completion the results are sent to the assistant chief, who reviews, then makes recommendations to the chief of police. There is also reference in the policy to the department Professional Standards Unit.

The department's practice differs from the written policy. The deputy chief conducts most complaint investigations, which slows the process. This is also noted in the discipline section of this report. In addition, the department does not have a Professional Standards Unit, and the proper rank title is deputy chief, not assistant chief, within the current written policy.

The deputy chief should not be tasked with conducting routine internal investigations as this detracts from more executive level duties. It is appropriate for the deputy chief to review and make recommendations to the chief.

It is recommended that with restructuring, the duties of internal investigations be placed under the support commander. This division is separated from the patrol and investigations divisions, thereby in most cases the investigators will not be working day to day with those subject to investigation.

Recommendations

- *Assign the responsibility of internal affairs investigations to the Support Division after restructuring.* ***Priority 2***
- *Policy 1008, Personnel Complaints, should be revised to reflect accurate titles and the responsibilities of the Support Division related to internal affairs.* ***Priority 2***

Emergency Management

Emergency management within a local municipality focuses on emergency preparedness for events that are greater than those normally handled by the local police and fire services. Large scale emergencies requiring extraordinary resource capacities required for mitigation, control, and continuation of government are the focus of emergency management. Events are planned for and responses are practiced ensuring local government preparedness for the coordination and oversight needed for response and recovery. Focus is initially placed on saving lives and minimizing damage in the first few hours/days of an extended event. This focus may include, but not be limited to, restoration of service infrastructure, resident evacuation, temporary sheltering, food services, medical assistance, and pet/animal care. Planning is coordinated with county government while meeting requirements established at the state and national levels for minimum training and policy development. Emergency management is also responsible to provide tracking oversight of response/mitigation costs for later submittal and reimbursement for disaster declaration funding.

A high functioning emergency management unit, focuses on how a municipality will respond to large scale event in addition to working with local businesses to assist in their planning and recovery. A loss of business services to a community can be devastating and depending on the nature of the business a vital link for mitigation or recovery needs may be broken when that business service is lost. These compound the impact of the event and has long lasting ramifications for the residents including a negative revenue impact on the local municipality. Emergency managers should be the educational coordination point for disaster planning to the local business community and should thereby focus significant attention on community sustainability post major emergency incident.

Based on the size of Glen Ellyn as well as the number of businesses and critical life service resources within the community, this level of preparedness can only be accomplished by devoting appropriate staff to complete this function. The police program coordinator serves as the local emergency coordinator for the village. This responsibility was assigned to this position when it was created in 2018. However, the position has been vacant since July 2020. From that time until the present, requirements for the emergency management function have been parsed to various supervisors but have not been well coordinated. The department acknowledges they are behind with this function and responsibility. It is recommended that the position of police program coordinator be filled, and this duty stay with that position.

Recommendations

- *Fill the position of police program coordinator and maintain emergency management responsibilities with this position.* ***Priority 2***

Records

The department staffs the Records Section 24-hours a day every day of the year. The administration's position is that since the police department is the only village department with staff on duty 24-hours a day, 7-days a week it is appropriate to have a village employee available to speak with directly if needed. The evening and weekend records clerks all have records responsibilities that they complete on their shifts. They are also responsible for helping individuals that come to the front desk needing assistance after regular daytime and Monday through Friday working hours. Oftentimes, they can assist these individuals without needing to call for a patrol officer to leave their assignment to come to the building. They also assist officers at the station with booking, bonding of prisoners, and other activities.

The department reports that turnover is frequent with part-time records clerks. At the time of this report, they are short two part-time records clerks. One of those clerks was scheduled on Friday and Saturday nights, which is an undesirable shift. That clerk had been with the department only one year. The other clerk worked Sundays and some shifts throughout the week. That clerk had been with the department two years and resigned to take a full-time clerk position at another police department.

The section is current with daily record entries. Long term, they are working on preparing the previous NetRMS records management system case records for document imaging. The NetRMS servers will not be serviced within the next couple of years, therefore they need to have an in-house permanent copy of the reports in that system. The clerks are currently doing the preparatory work of separating and organizing documents and creating a bar code face sheet for each report in preparation for imaging. The preparatory work provides a cost savings to the department.

The firm of Microsystems is processing reports from 2006 and 2007. The clerks are currently prepping reports from 2008 with the years 2009 through 2019 (when a new records management system was acquired) awaiting processing next.

The Records Section has a civilian records supervisor, four full-time clerks, and five part-time clerks. To further examine staffing levels for this section the comparable departments were analyzed. All of the departments employ full-time clerks, nine comparable departments (75 percent) employ a full-time records supervisor. On average the other departments have 3.83 full time clerks. Glen Ellyn is close to the average of full-time clerks at four. Eight of the comparable departments employ part-time clerks, with 6.6 being the average. Glen Ellyn falls below the average with five part-time clerks. Examining FTEs, the average of comparable departments is 4.62 records employees, Glen Ellyn is above the average of FTEs with 6.5. The ratio of records employees to sworn staff shows that the average for comparable departments was 0.129 records personnel to sworn staff, Glen Ellyn is slightly above that average with a ratio of 0.188.

Glen Ellyn compares favorably with other departments in records staffing. However, it is recognized that legislation as described in other sections of this report will have an impact on increased workload. Additionally, they are in the process of document imaging over 10 years of police reports. Consultants do not recommend reducing or adding additional records staff. However, the position of administrative assistant, recommended to be supervised by the deputy chief, should be assigned to assist in the Records Section as needed.

Table 19: Comparable Agencies Records Employees to Sworn Ratio

Department	Population	Records Supervisor	Records Clerks			Total Authorized Sworn			Records Employees/ Sworn Ratio
			Full-Time	Part-Time	Total FTE	Full-Time	Part-Time	Total FTE	
Geneva	21,495	1	9	5	11.5	37	0	37	0.34
Batavia	26,250	1	5	4	7	41	0	41	0.20
Glen Ellyn	27,714	1	4	5	6.5	40	0	40	0.19
Bartlett	41,487	1	8	2	9	59	0	59	0.17
Lemont	17,291	1	1	3	2.5	22	4	24.0	0.15
Darien	21,304	0	4	1	4.5	34	0	34	0.13
Lisle	23,431	1	3	2	4	38	0	38	0.13
Roselle	23,298	1	3	0	3	32	0	32	0.13
Carol Stream	40,000	1	6	1	6.5	69	0	69	0.11
Bloomingdale	22,018	1	3	1	3.5	48	0	48	0.09
Woodridge	32,971	1	2	0	2	51	0	51	0.06
La Grange	15,322	0	1	0	1	28	3	29.5	0.03
Westmont	24,600	0	1	0	1	41	0	41	0.02

Recommendations

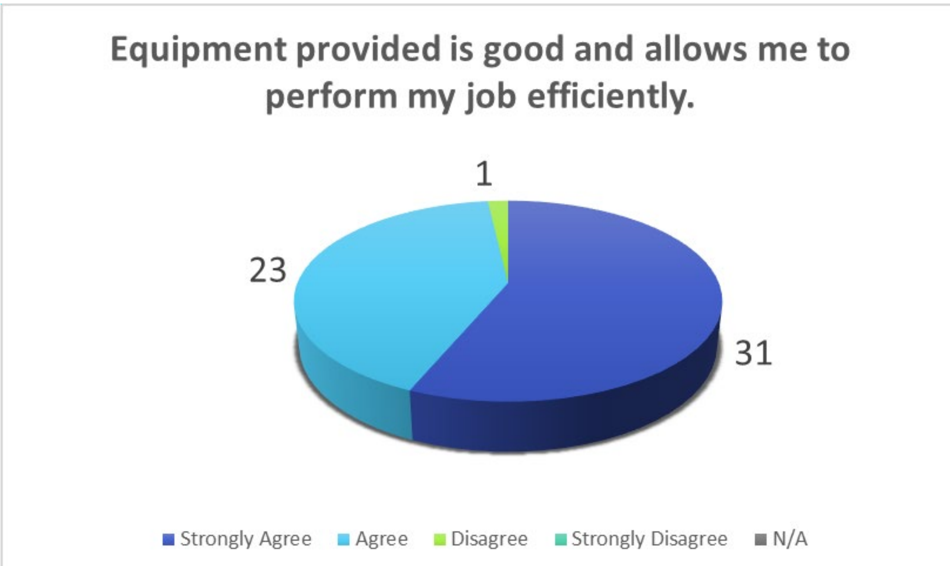
- *The position of administrative assistant, recommended to be supervised by the deputy chief, should be assigned to assist in the Records Section as needed.* ***Priority 2***

EQUIPMENT

In structured interviews department personnel were asked to rank the following statements:

EQUIPMENT PROVIDED IS GOOD AND ALLOWS ME TO PERFORM MY JOB EFFICIENTLY.

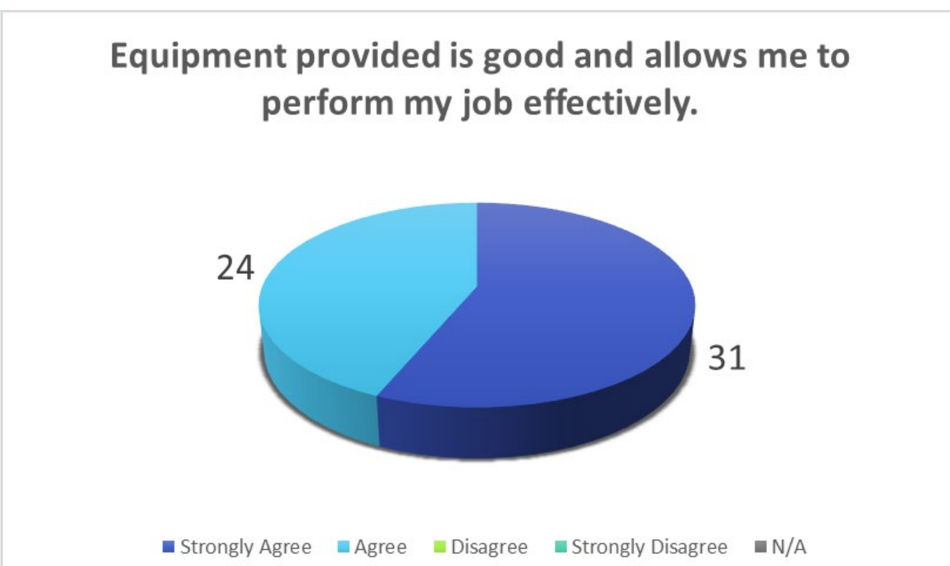
Figure 25: Staff Survey Interview Question # 13



Strongly Agree	56%
Agree	42%
Disagree	2%
Strongly Disagree	0%
N/A	0%

EQUIPMENT PROVIDED IS GOOD AND ALLOWS ME TO PERFORM MY JOB EFFECTIVELY.

Figure 26: Staff Survey Interview Question # 14



Strongly Agree	56%
Agree	44%
Disagree	0%
Strongly Disagree	0%
N/A	0%

Staff is in agreement that they have the equipment needed to perform their jobs. Equipment allows the job to be performed efficiently as ranked by 98 percent of the department. The staff is in 100 percent agreement that equipment allows them to perform their jobs effectively.

The police administration advises that the revenue received from the Drug Enforcement Agency Task Force has been used to fund needed equipment, and that substantial improvements have been made in upgrading equipment in recent years.

Initial research should be undertaken to begin development of policy and procedures for implementation of body cameras for officers, as well as storage, purchase, maintenance, etc. The House Bill 3653 requires that all municipalities in Illinois with populations under 50,000 must implement body cameras by January 1, 2025.

Recommendations

- *Begin initial research into implementation of body cameras for officers.* ***Priority 3***

TECHNOLOGY

Advancements in technology have provided many improvements and efficiencies and have made police departments more effective. While it is true that law enforcement agencies enjoy a higher level of technological support than in years past, one must also recognize that it still takes human interaction to use and manage the technology. For example, a department can purchase technology that permits them to download data from cell phones and computers that will provide investigative leads and evidence that would not have been available in the past. While this is true, it can be a time-consuming task to break passwords and download data from a locked device while maintaining the chain of custody of the device. Once the data has been retrieved, someone needs to review the data to determine what is relevant to the investigation.

It is also appropriate to note that offenders are using some of the same technology to commit crimes that has not previously existed. The frequency of on-line fraud, exploitation of children, and distribution of child pornography is staggering, which creates an increase in crimes committed that requires investigating. These investigations can be much more complex than those in the past. An additional challenge presented by on-line crime is that it has no geographic limitation. Whereas in the past, most crimes investigated by a police department occurred within the geographic village limits, on-line crimes can be committed by anyone in the country or internationally that has a cell phone or computer and access to the internet. This creates a significant challenge to the investigator, in that it frequently requires coordination with law enforcement assets and prosecutors far outside the village, county, or state borders. In fact, the department described a recent case they investigated that led to uncovering multi-million dollar online fraud in which the offenders originated from another continent.

Each case is unique in its seriousness, complexity, and geographic proximity to Glen Ellyn and therefore the positive or negative impact on the police department and investigation section cannot be reliably and accurately quantified.

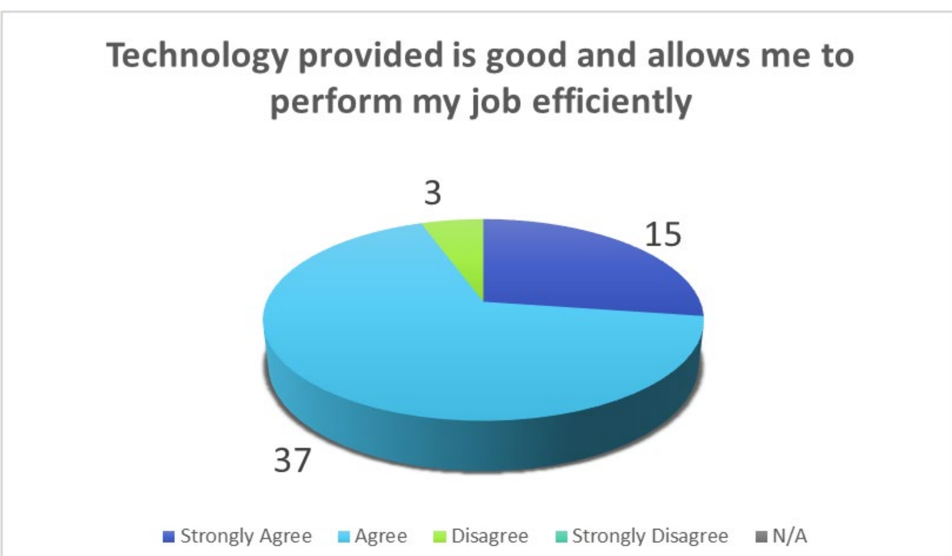
In recent years, the department has substantially improved their use of technology with automated license plate readers, updating the records management system, and obtaining and using a Cellebrite device for forensic digital investigations. Cellebrite is a state-of-the-art product that enables investigators to retrieve evidence from phones and other electronic devices. In today's investigations digital evidence is becoming commonplace and police departments should to be prepared to handle this technology shift.

The department has two pole cameras used for surveillance, a forward looking infrared (FLIR) camera for enhanced night vision which is an excellent tool when searching for endangered missing persons, ZedX software which provides cell phone tracking, and E Line-up software that generates more efficient photo line-ups. These technologies serve as force multipliers for the department. The funding for these enhanced technologies have come primarily from asset forfeitures from the Drug Enforcement Agency Task Force. Technology for administrative functions includes several software modules of the company LEA are used to track training, traffic crashes, other traffic issues, use of force, complaints, uniforms, and equipment.

In structured interviews department personnel were asked to rank the following statements:

TECHNOLOGY PROVIDED IS GOOD AND ALLOWS ME TO PERFORM MY JOB EFFICIENTLY.

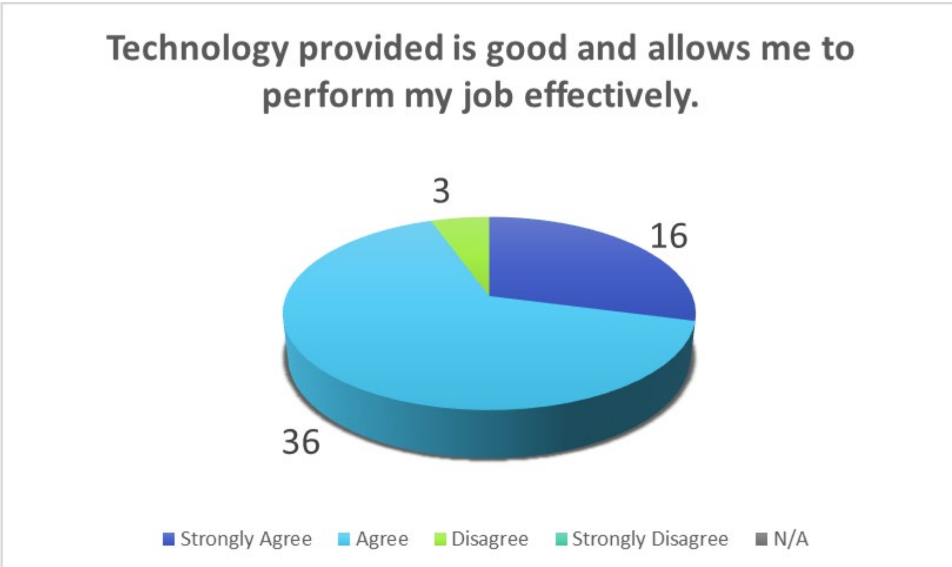
Figure 27: Staff Survey Interview Question # 15



Strongly Agree	27%
Agree	67%
Disagree	5%
Strongly Disagree	0%
N/A	0%

TECHNOLOGY PROVIDED IS GOOD AND ALLOWS ME TO PERFORM MY JOB EFFECTIVELY.

Figure 28: Staff Survey Interview Question # 16



Strongly Agree	29%
Agree	65%
Disagree	5%
Strongly Disagree	0%
N/A	0%

As shown from employee interviews the department technologies are assisting with the efficient and effective work process.

Recommendations

- *Continue to explore technologies that make the work process efficient and effective.* ***Priority 3***

HUMAN RESOURCES

Fire and Police Commission

Within the State of Illinois, the village follows Chapter 65 of the Illinois Compiled Statutes to provide power and authority to the Board of Fire and Police Commission (BFPC). This BFPC is made up of three members who do not hold any public position or office and are appointed by the mayor with approval by the Village Board. This process was developed with the intent to have fair and impartial hiring and disciplinary processes. However, since the Civil Rights Act of 1991 in which the burden of proof for discrimination changed from the employee to the employer, and the introduction of a jury trial, as well as punitive and compensatory damages, an employer's human resources compliance landscape has significantly changed. Employers now have significant compliance standards/burden of proof, this allows for some flexibility within these processes, because compliance is now simply the law.

There are no qualifications to be a member of the BFPC other than they cannot hold a public office position and must have a demonstrated interested. This is not to say commission members are not qualified, only that there is not a high level of qualification threshold. As a result, the hiring processes may be conducted by individuals who have a desire, but do not necessarily have the human resources nor operational qualification needed to properly participate in the selection process of the position being filled. Human resources attends commission meetings to ensure legal compliance with the interviewing process and a sergeant serves as an administrative liaison with the processing of applicants for the commission only.

In reviewing the BPFC Policy and Procedures, what is concerning is there is no formal participation written into the policy for the chief/designee or human resources to be included in the hiring process, such as interviewing with the commission. The concern is the potential disconnect between the qualities the police chief is looking for in a candidate as compared to what the commission is looking for in a candidate.

The solution to this is twofold. First, the village should ensure all commission members secure training for this role from an operational and human resources perspective. Illinois has a Fire and Police Commission Association that provides training opportunities which can be explored. Human resources should develop a training module for interviewing techniques that include legal compliance, industry standards and best practices, ranking, documentation retention, etc. In addition, the police department should introduce new commission members to the department by providing them access to certain operations, through ride-alongs or citizen academy opportunities. The dialogue between the police chief and the BFPC should also be ongoing in meetings to describe the department's human capital needs and the qualities that will align best with the values of the department. Obtaining the proper personnel allows the chief to effectively carry out operations and strategic goals established by the Village Board. In summary, the BFPC plays a critical role in understanding the right candidate fit and finding those candidates through the current recruitment processes. Unfortunately, it cannot be measured whether the current processes has facilitated the high washout rate in the department. Regardless, ensuring the BFPC understands the department's needs will only strengthen the recruitment processes.

The second solution is to formally include the police chief or designee and human resources into the interview process so feedback from administration and the department is considered and included in the outcomes. This would be ideal balance to have both citizen members and subject matter experts involved.

Recommendations

- *Allocate administrative functions related to the hiring process to a qualified civilian human resource professional or other confidential administrative staff to allow the sergeants the opportunity to focus on other operational demands.* ***Priority 2***
- *Incorporate personality testing into the department's hiring process.* ***Priority 3***
- *Ensure BFPC members are trained/educated on operational and human resources perspectives and understand the preferred qualities in applicants.* ***Priority 2***
- *Incorporate command staff and human resources into the BFPC interviewing processes to allow for the inclusion of subject matter experts.* ***Priority 2***

Recruitment

In discussions with village administration and command staff, the department described turnover within the department, having recurring vacancies, which could have an impact on staffing, overtime costs, and burnout, so this was analyzed further.

Employee turnover refers to the number or percentage of employees who leave an organization and are replaced by new employees. Measuring employee turnover is helpful to examine the reasons for turnover.

Turnover often has a negative connotation, yet turnover is not always a negative event. For example, desirable turnover occurs when an employee whose performance falls below the organizations expectations is replaced by someone whose performance meets or exceeds expectations. It is desirable because poor job performance can be costly both financially and culturally. Desirable turnover occurs when replacing employees infuses new talent and skills, which can be positive to an organization. Conversely, undesirable turnover means the organization is losing employees whose performance, skills and qualifications are valuable resources.

High turnover rates can negatively affect an organization and its employees in many ways. It is easy to veer from the true mission and vision of the organization when there is a constant need to hire and train new employees; by retaining the appropriate employees, an organization can provide a higher caliber workforce.

Employee turnover also has a direct impact on budgets. One such cost to the village is turnover cost, the actual financial cost to the village when an employee vacates, and a new hire is brought in for replacement. Turnover can be calculated as total payout cost + recruitment cost + replacement compensation/benefit cost + training cost. Turnover costs will typically calculate around 1.5 times the cost of the original position. Considering the significant amount of training and equipment associated with public safety positions, turnover costs can be as high as double the cost of the original positions, which is in addition to the impact to operations that can be felt to its constituents over time.

Turnover is expected in every organization, and welcomed in some cases, therefore no organization should expect a zero-turnover rate. The generally accepted industry standard for an organization is approximately 10 percent turnover each year. However, even a 10 percent turnover rate may not be a healthy percentage if the employees who are leaving are strong performers. Healthy turnover is described as employment separation from low performers, which then cultivates an engaged and high-performing workforce.

In addition, the Bureau of Labor Statistics (BLS) reports state and local government turnover rates (excluding education) at 19.5 percent nationwide for the year 2019, which has been constant over the last several years. The BLS does not isolate public safety turnover data, and no related data has been calculated by reputable government sources since 2008 for a more specific comparison.

In reviewing the department's turnover for January 1, 2017 through December 31, 2020, the following table summarizes the department's turnover per year. This includes retirement, resignation, and discharge for all sworn ranks, police officer only, and new hire turnover.

Table 20: Turnover Rates 2017-2020

Year	Number of Terminating Sworn	Sworn Turnover Rate*	Police Officer Only Turnover Rate**	Police Officer New Hire Turnover Rate***
2017	3	7%	10%	50%
2018	4	10%	3%	67%
2019	5	12%	17%	50%
2020	4	10%	13%	14%

*Based on 41 approved sworn positions.
**Based on 30 approved police officer positions.
***Based on percentage of new hires for each year.

Overall, the department's turnover is less than the industry standard, and less than reported turnover from the Bureau of Labor Statistics for local government. Typically, turnover rates such as these are not problematic. However, a closer look shows the turnover is more problematic with new hire turnover, in which employees who were hired, also left within their first year of employment, which is consistent with the department's statement of high washout rates during the Field Training Officer (FTO) process.

As previously stated, not all turnover is negative, and Glen Ellyn is no exception. During the discussions with village personnel, the department has taken on the concept to hire for attitude and teach the skill. The department prides itself on holding a high standard for employment and utilizes the probationary period to dismiss new hires that do not align with the values and expectations, which provides an overall benefit overall. Nonetheless, turnover can have a negative impact to the department over time because shifts are open on an ongoing basis, and staff are not able to take time off, which can lead to burnout and a decline in morale. Therefore, a review of the hiring practices was conducted to assess if there are any opportunities the village can incorporate into the hiring process to select candidates that align better with the values of the department to help minimize turnover.

The department did not report any unusual challenges with recruitment, although recruitment efforts in general for law enforcement throughout the United States are generally more challenging because there are less applicants for law enforcement positions, background concerns eliminate a high number of applicants, and a rigorous hiring process simply take time. In reviewing the recruitment process, the village has a very robust hiring process. The efficiency of this process was not included in the scope of this project, but rather a look at any opportunities to facilitate retention/staffing.

Recruitment Responsibilities

The Human Resource (HR) function is one of the major components of any organization. Its policies impact every member of the organization and can be an area of major litigation. Most organizations have a human resources department, which is often a strategic business partner to an organization. As a strategic business partner, they ensure the 'human capital' management is done in an objective and lawful manner and is consistent with the mission of the organization, while fostering a positive work environment. Although the village has a Human Resources Department, the police department, manages much of the recruiting and hiring process themselves, meaning human resources is partially decentralized, which is likely due to limited human resources staffing. The benefits of a centralized system include streamlined processes, legal compliance, reduction in the amount of time command staff must spend on HR functions so they may focus more on their respective operations, and placing HR functions with trained human resources staff. The village HR staff perform transactional duties (placing ads, receiving reports, and assisting the commission with interviewing, etc.) but was not described as being a strategic partner with the hiring process. The department receives support from human resources, just not as a strategic partner.

Over time, the village has developed a recruitment process which is heavily managed by the police department, with assistance from human resources in a limited capacity, and it must be acknowledged the hiring process is working. The benefit of the police department's involvement with these processes is the understanding of the role of public safety. The challenges are the sergeants assigned HR functions are often not subject matter experts in human resources and have other operational demands. One must balance the opportunity for sergeants and higher ranks to be involved with the hiring process to build administrative and leadership skills against the operational needs of the department. This was an area of feedback from within the department that the administrative functions placed on the sergeants have removed them from their operational responsibilities.

When going over recruitment responsibilities assigned to the sergeants, this work involves the following:

- Communication with the third-party vendor who accepts, screens, and tests candidates
- Case management of candidate files
- Communication and forms processing with candidates
- Assignment/completion of background checks
- Reviewing background findings for disqualifiers.
- Scheduling interviews and testing
- Liaison with the Board of Fire and Police Commission
- Recruitment/candidate documentation

This list is non-inclusive but represents most key responsibilities. Although there are duties described which should be conducted by a member of the department, such as reviewing background checks, many of the administrative functions could be performed by a qualified civilian human resource professional or other confidential administrative staff to allow the sergeants the opportunity to focus on other operational demands. This would allow the sergeants and higher ranks to simply serve in the capacity of a subject matter expert of law enforcement as it pertains to the selection process, not the human resources expert.

Recruitment Process Opportunities

It was found the department utilizes Industrial/Organizational Solutions (IOS), a third-party vendor to receive applications and proctor validated testing to applicants. Applicants that pass the initial testing phase are then forwarded to the village for continuation within the hiring processes under the policies and procedures outlined in the Board of Fire and Police Commission.

Once the applications are received by IOS, the village then conducts the following:

- BFPC panel interview
- Background check/investigation
- Second BPFC panel interview
- Physical and drug test (post offer)
- Polygraph (post offer)
- Psychological examination (post offer)

Personality Testing

A tool that may be useful to the village is the inclusion of personality testing into their process. Personality testing is used to gain insight on an applicant’s interactions, personality, and behavioral tendencies. The intent is to identify the applicant’s character relevant to the job. This is different from an aptitude test, which measure one’s ability to do the job. Personality tests assess whether the applicant will do the job, and how, and is generally an indicator of how the person will perform. Filling positions with candidates who are the right fit may lessen turnover because they are screened out before hire.

For personality testing to be an effective instrument, the village should establish a baseline. Conducting the personality test on current officers will give the village the foundation of the indicators most successful within the organization. The intent of administering this instrument to current employees is not to identify current issues, but simply to establish the benchmarks for new hires going forward to better capture job suitability and culture fit.

There are several tools on the market for the village to consider. However, IOS does offer non-cognitive assessments that could be incorporated into the initial application/testing phase they perform. The consultants recommend pursuing options with IOS first to prevent creating an additional step in the hiring process.

Recommendations

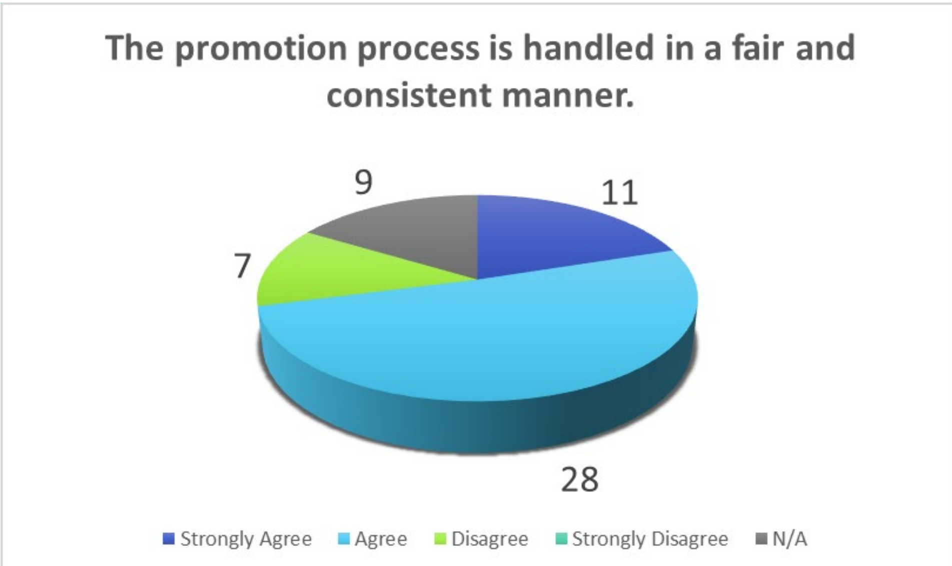
- *Pursue non-cognitive assessments within the hiring process to attempt to better match applicants to department success. IOS has options consider to incorporate into the current application process.* ***Priority 3***
- *Establish a baseline of non-cognitive characteristics from the current officers to identify the successful indicators of the organization.* ***Priority 3***

Promotion

In structured interviews department personnel were asked to rank the following statement:

THE PROMOTION PROCESS IS HANDLED IN A FAIR AND CONSISTENT MANNER.

Figure 29: Staff Survey Interview Question # 24



Strongly Agree	20%
Agree	51%
Disagree	13%
Strongly Disagree	0%
N/A	16%

The majority of employees, 71 percent, agreed or strongly agreed that the promotion process is handled in a fair and consistent manner. None strongly disagreed. The department currently includes an assessment center and interview panel with internal and outside panel participants for promotional considerations, which aligns with industry best practices.

Performance Management

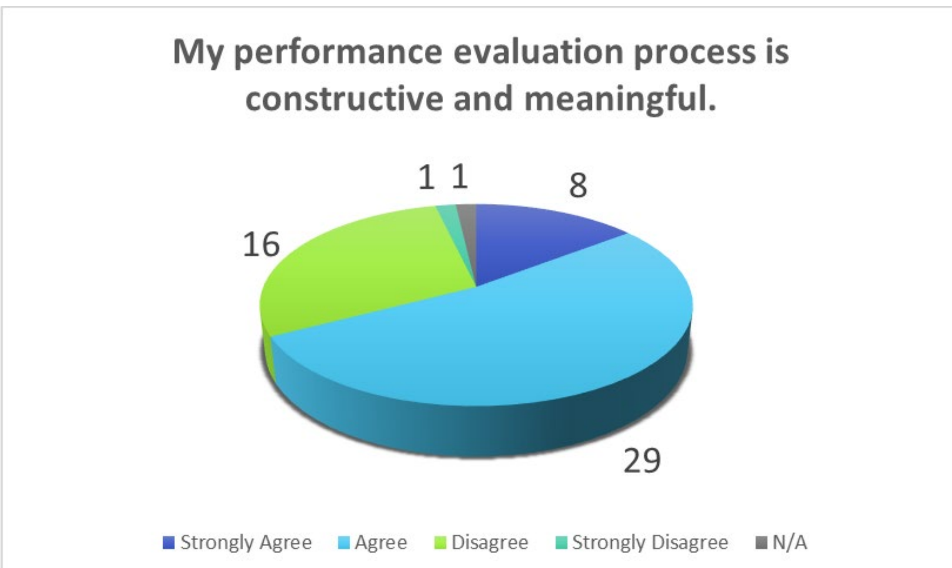
In today's work environment, an employee's evaluation should be specific to inform and guide the employee in the performance of their duties. Performance appraisals is one of the key processes that, when effectively carried out, provides a climate conducive to performance excellence and personal growth, helps employees know their contributions are recognized and acknowledged, and provides guidance for career and professional development. Employees typically desire honest and regular feedback. As a result, an effective performance management system should include regular communication between a supervisor and employee to ensure that employee's performance in all areas is reinforced and supported; identify and leverage opportunities to utilize the employee's greatest strengths, and address performance deficiencies and expectations immediately.

Currently the police department conducts an annual evaluation process on its officers, but the annual evaluation is developed based upon contemporaneous written documentation that is developed and shared with the employee during the evaluation year. Each of these performance opportunities are shared with the employee at the time, and the employee signs to acknowledge receipt. The department does not consider events or feedback that has not been documented. In essence, the village is providing performance updates regularly throughout the year with the employee and simply summarizing the years events into the annual review. The annual review is developed with all sergeants, to include the feedback provided across supervisors. There is no prohibition against an employee asking for a supervisor to document events the employee feels are important as well.

In structured interviews department personnel were asked to rank the following statement:

MY PERFORMANCE EVALUATION PROCESS IS CONSTRUCTIVE AND MEANINGFUL.

Figure 30: Staff Survey Interview Question # 23



Strongly Agree	15%
Agree	53%
Disagree	29%
Strongly Disagree	2%
N/A	2%

Although 31 percent do not feel the evaluation process is constructive and meaningful, there was very little specific feedback to identify why. Conversely, 68 percent reported positively on the process. The village's process follows best practices to engage the employee throughout the year, document performance as it occurs, share it with the employee as it occurs so there are no surprises, prohibits the use of events that were not documented, and engage multiple supervisors through the process, so the process should be effective. In accordance with the collective bargaining agreement, the current evaluation program shall continue without significant modification for the life of the agreement or the life of the current pay system, whichever is shorter. The department may request more specific information from officers for feedback on this topic to determine if the department simply needs to be educated on effective performance management practices or if there is an opportunity to incorporate other desired elements of performance management in the future.

Disciplinary Process

Current expectations and attitudes regarding law enforcement range from absolute support of law enforcement to demands for the defunding and/or abolishment of police departments. This greatly affects the expectations of the members of the community as it relates to the outcome of police misconduct investigations and discipline imposed.

It is imperative the department have a written policy that establishes an internal system where objectivity, fairness, and just outcomes are assured by intensive and impartial investigation and review of accusations made against the agency and department employees. It is equally important to impose fair, consistent and effective discipline based on just cause.

Currently, the village has Discipline Policy within the Personnel Manual, which covers the police department in which discipline ranges from a verbal warning to termination from employment. The investigative process on matters which may result in disciplinary action is a responsibility of the police department, which is included in the Department Policy Manual.

To ensure the organization meets the Just Cause standard for discipline, it is recommended the village utilize the Seven Tests of Just Cause. These are set criteria/guidelines developed out of arbitrations across the United States to apply facts to each case to ensure the employer has met the Just Cause standard. The seven steps are as follows:

1. <u>Reasonable Rule or Work Order.</u> Is the rule or order reasonably related to the orderly, efficient, and safe operation of the business?
2. <u>Notice.</u> Did the employee receive adequate notice of the work rule or performance standard and the possible consequences of failure to comply?
3. <u>Sufficient Investigation.</u> Did you conduct an investigation before making a decision about taking disciplinary action?
4. <u>Fair Investigation.</u> Was your investigation fair and objective?
5. <u>Proof.</u> During your investigation, did you find proof of misconduct or of a performance discrepancy?
6. <u>Equal Treatment.</u> Have you dealt with your employees equally, without discrimination?
7. <u>Appropriate Discipline.</u> Is the proposed discipline appropriate?

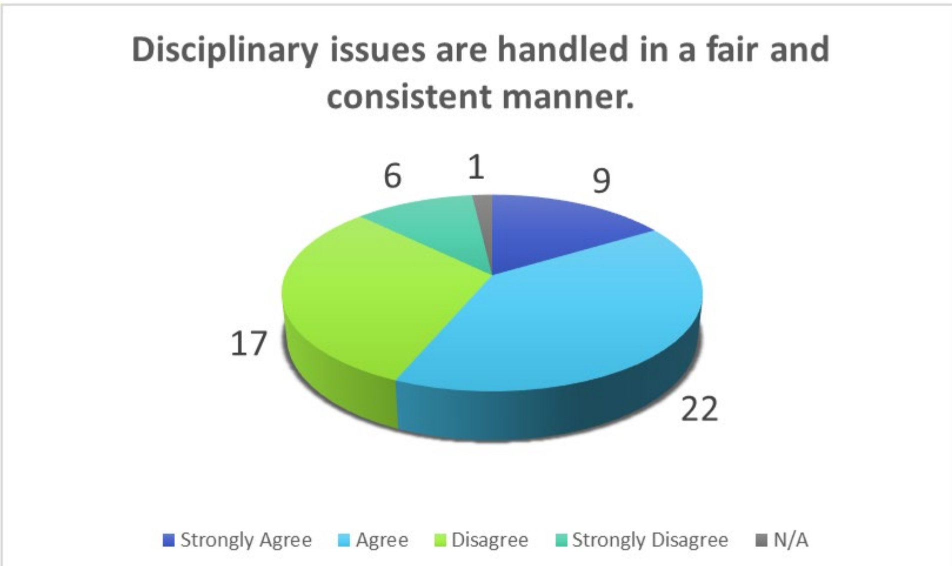
By utilizing these steps, number 6 requires the organization assess whether the rules and penalty were applied consistently across the organization, meaning similar infractions are penalized consistently and objectively. A disciplinary matrix that outlines the expected disciplinary path for many infractions is also critical to better insure consistency. Adopting a disciplinary matrix is recommended.

In structured interviews department personnel were asked to rank the following statement:

DISCIPLINARY ISSUES ARE HANDLED IN A FAIR AND CONSISTENT MANNER.

From the interview data analyzed, some employees feel there is a gap in fair and consistent handling of disciplinary issues.

Figure 31: Staff Survey Interview Question # 22



Strongly Agree	16%
Agree	40%
Disagree	31%
Strongly Disagree	11%
N/A	2%

During interviews, 42 percent of employees disagreed or strongly disagreed with the statement, “Disciplinary issues are handled in a fair and consistent manner”. The majority of employees, 56 percent, agreed or strongly agreed that disciplinary issues are handled fairly and consistently.

Employees indicated that internal investigations are not completed in a timely manner, employees also stated this creates concern and stress for those that are the subject of a pending outcome that could result in negative discipline. The police administration confirmed there are occasionally delays in internal investigations. This is because investigations are primarily conducted by the deputy chief, who has an undesirable span of control and amount of duties. Recommended organizational restructuring assigns the internal affairs function to the Support Division. This centralizes the function and provides adequate personnel and oversight, which will hasten the process.

Inconsistent application of discipline was also cited by five employees. The comments were general in nature and did not cite specific instances. Department administration reports that actual imposition of discipline from verbal warnings to termination are not tracked in a single document; instead, the discipline is in the employee file. The department administration also felt that the agency is small enough that supervisors and administration remember discipline imposed.

It was reported that actual discipline is minimal, with actions of suspension or termination an extremely rare event. However, it is recommended that disciplinary actions be tracked and analyzed annually for consistency and good record keeping.

Recommendations

- *Utilize the Seven Tests of Just Cause when considering discipline.* ***Priority 2***
- *Create and adopt a disciplinary matrix to be used as a guide for disciplinary consistency.* ***Priority 2***
- *Create and use a discipline log to be maintained in the office of the chief of police.* ***Priority 2***
- *Review the disciplinary log annually to ensure consistency of discipline.* ***Priority 2***
- *Assign internal investigations to the function of the Support Division after restructuring.* ***Priority 2***

Employee Wellness/EAP/Peer Support

In the last year, a strong focus has been placed on wellness and mental health concerns of police employees. The recent House Bill 3653 requires annual officer wellness and mental health training. The bill also has provisions for implementing standards for mental health screenings of officers and ensuring counseling sessions and screenings remain confidential. There should be sources available for both sworn and civilian police employees to seek confidential mental health assistance when needed.

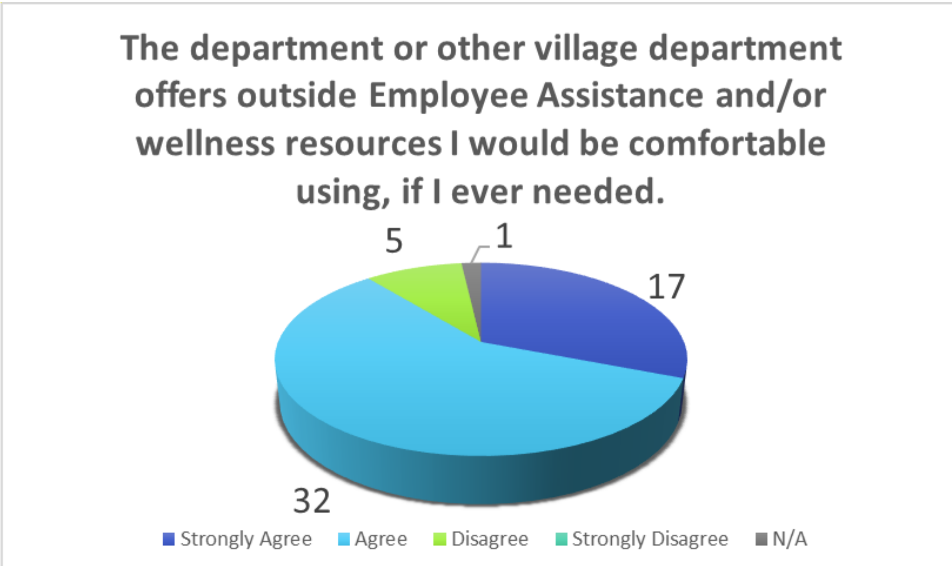
The department and village have taken positive steps to ensure employees have access to such services. In 2019, the department subscribed to a peer support network titled *"We Never Walk Alone".* This network is available to all department employees 24 hours a day, 7 days a week, 365 days a year. Employees struggling with mental health issues can call peer mentors and professional counselors. They choose from the list of individuals depending on their particular needs. The calls are anonymous, and no information is provided to the employer. Both sworn and civilian personnel can access this service. This program aids in compliance with requirements in the House Bill 3653.

The service also makes educational materials available to employees. The Glen Ellyn Police Department was the first agency in DuPage County to join this network. In addition to this service the village also has a separate Employee Assistance Program, so employees have multiple options.

In structured interviews department personnel were asked to rank the following statements:

THE DEPARTMENT OR OTHER VILLAGE DEPARTMENT OFFERS OUTSIDE EMPLOYEE ASSISTANCE AND/OR WELLNESS RESOURCES I WOULD BE COMFORTABLE USING, IF I EVER NEEDED.

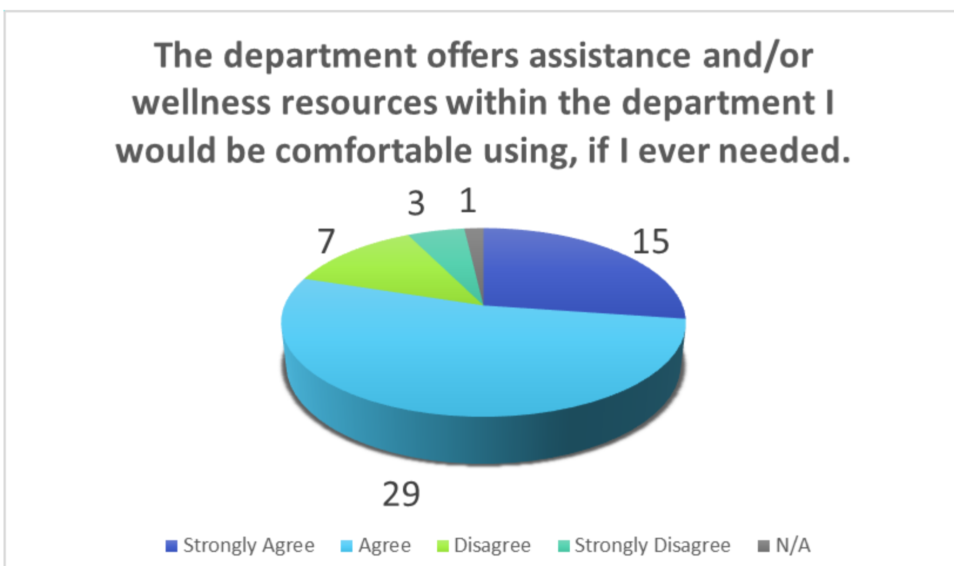
Figure 32: Staff Survey Interview Question # 18



Strongly Agree	31%
Agree	58%
Disagree	9%
Strongly Disagree	0%
N/A	2%

THE DEPARTMENT OFFERS ASSISTANCE AND/OR WELLNESS RESOURCES WITHIN THE DEPARTMENT I WOULD BE COMFORTABLE USING, IF I EVER NEEDED.

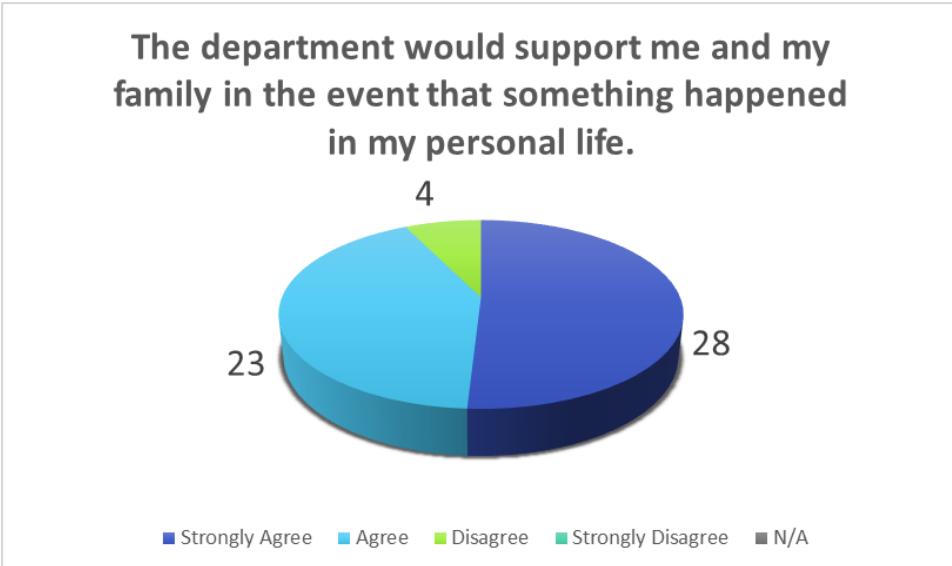
Figure 33: Staff Survey Interview Question # 19



Strongly Agree	27%
Agree	53%
Disagree	13%
Strongly Disagree	5%
N/A	2%

THE DEPARTMENT WOULD SUPPORT ME AND MY FAMILY IN THE EVENT THAT SOMETHING HAPPENED IN MY PERSONAL LIFE.

Figure 34: Staff Survey Interview Question # 20



Strongly Agree	51%
Agree	42%
Disagree	7%
Strongly Disagree	0%
N/A	0%

From interviews with all department employees there is clear indication that the programs are well received. Furthermore, employees strongly cite department support if they would need it.

DIVERSITY, EQUITY, AND INCLUSION

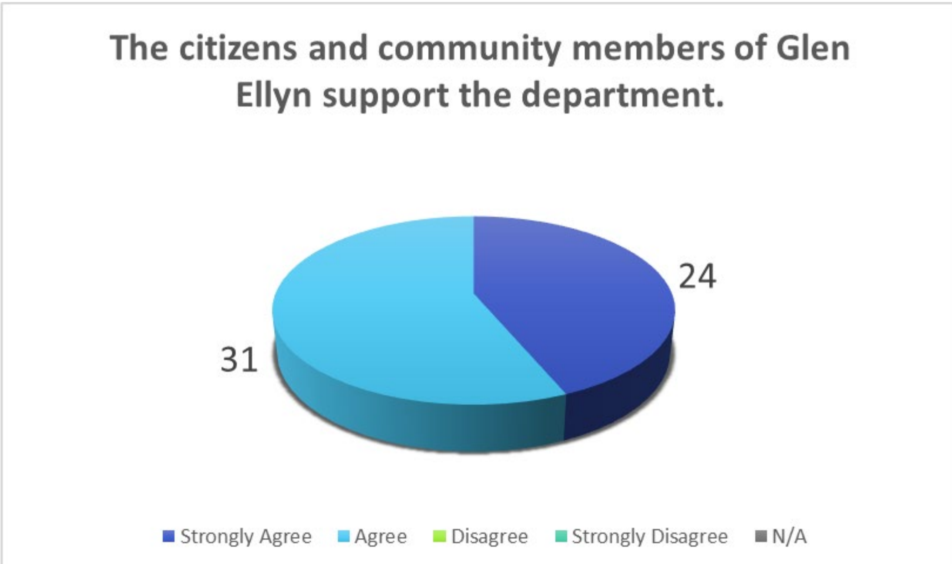
Diversity, equity and inclusion are some of the most important issues facing law enforcement agencies today. It is vital for positive relations with the community which can translate into greater support for the department as well as a strong and positive reputation and a sense of fairness from the community.

To examine these issues, responses and comments from the department members were compared to those community members interviewed.

In structured interviews with both department personnel and community members; all were asked to rank the following statements:

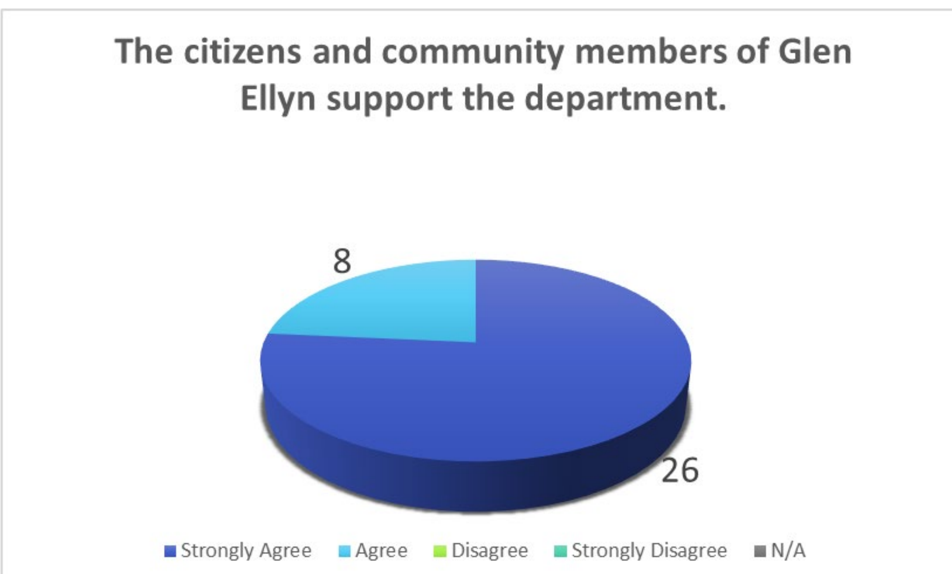
THE CITIZENS AND COMMUNITY MEMBERS OF GLEN ELLYN SUPPORT THE DEPARTMENT.

Figure 35: Staff Survey Interview Question # 30



Strongly Agree	44%
Agree	56%
Disagree	0%
Strongly Disagree	0%
N/A	0%

Figure 36: Elected & Community Survey Interview Question # 1

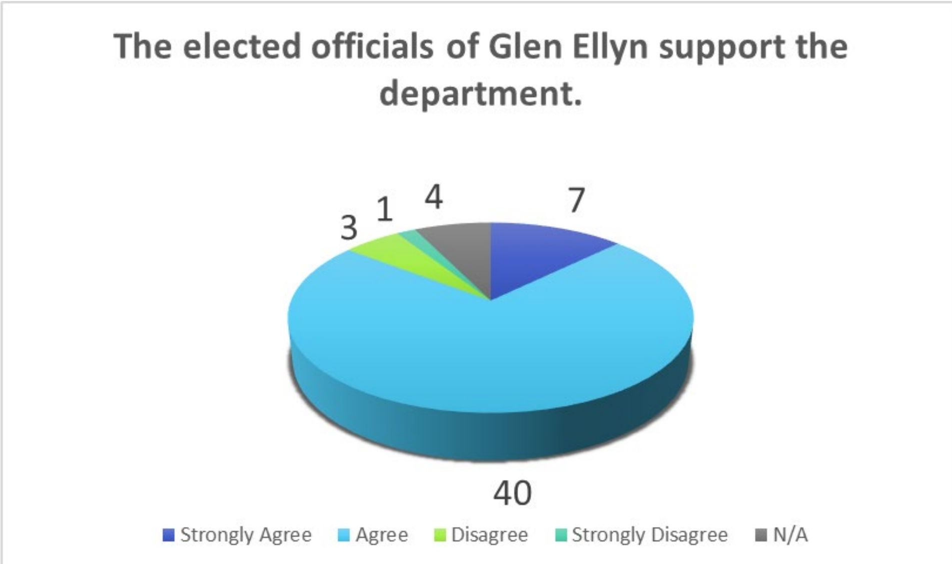


Strongly Agree	76%
Agree	24%
Disagree	0%
Strongly Disagree	0%
N/A	0%

The department and community are both aligned in their views of community support toward the department, with the community providing an even stronger positive response than the department reported.

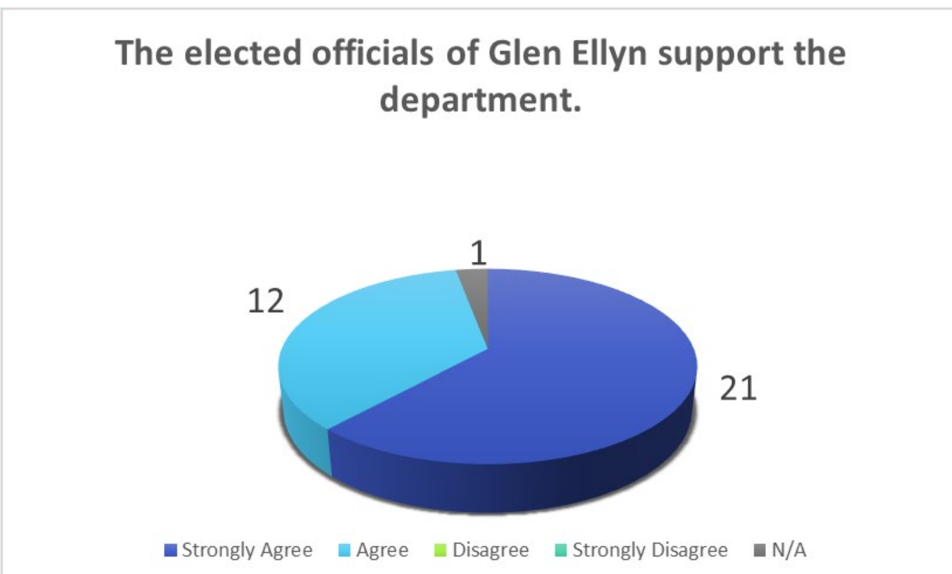
THE ELECTED OFFICIALS OF GLEN ELLYN SUPPORT THE DEPARTMENT.

Figure 37: Staff Survey Interview Question # 31



Strongly Agree	13%
Agree	73%
Disagree	5%
Strongly Disagree	2%
N/A	7%

Figure 38: Elected & Community Survey Interview Question # 2

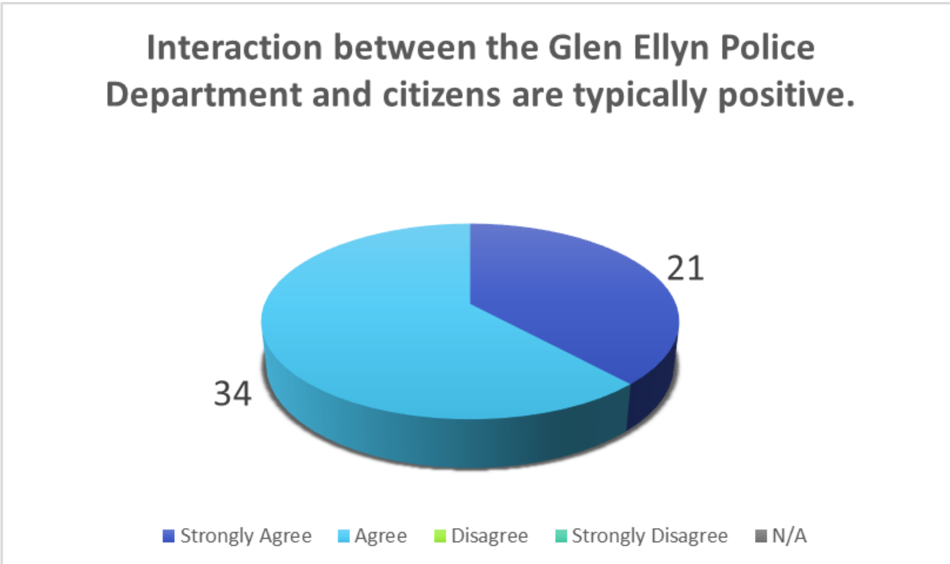


Strongly Agree	62%
Agree	35%
Disagree	0%
Strongly Disagree	0%
N/A	3%

The community views very strong support from elected officials toward the department, and while the department also agrees that elected officials are supportive, to a lesser degree, a small percentage disagreeing with that statement.

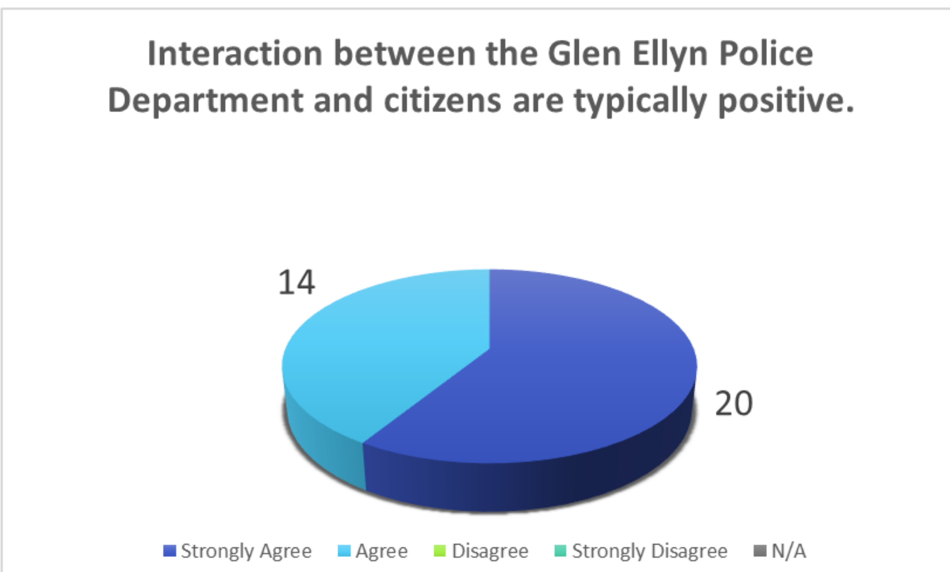
INTERACTION BETWEEN THE GLEN ELLYN POLICE DEPARTMENT AND CITIZENS ARE TYPICALLY POSITIVE.

Figure 39: Staff Survey Interview Question # 32



Strongly Agree	38%
Agree	62%
Disagree	0%
Strongly Disagree	0%
N/A	0%

Figure 40: Elected & Community Survey Interview Question # 3

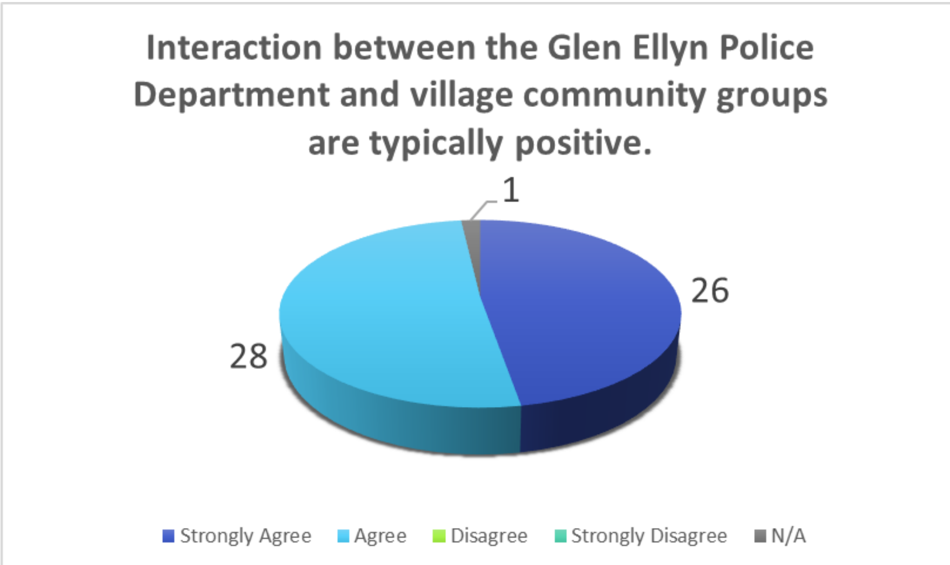


Strongly Agree	59%
Agree	41%
Disagree	0%
Strongly Disagree	0%
N/A	0%

The department and community are both aligned in their views of positive interaction with citizens, with the community providing an even stronger positive response than the department reported.

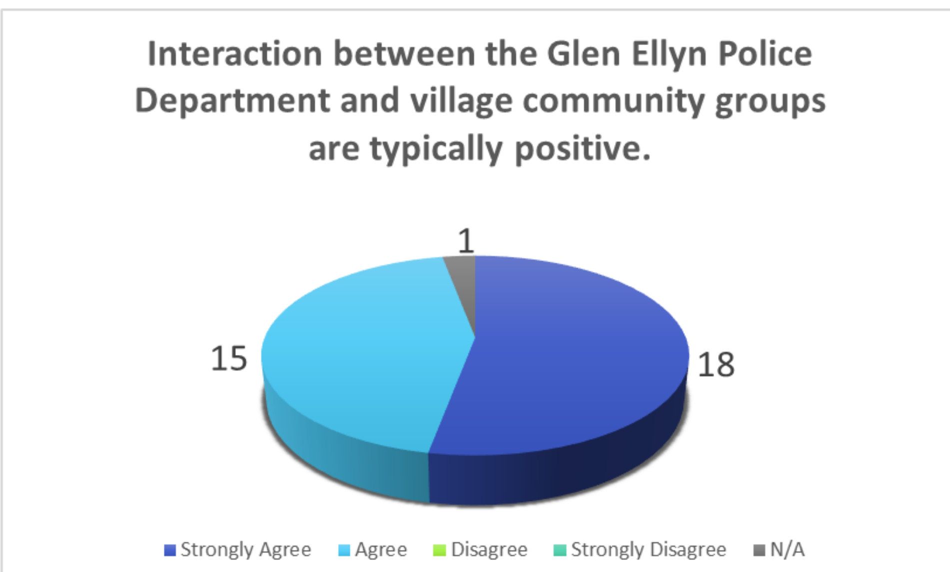
INTERACTION BETWEEN THE GLEN ELLYN POLICE DEPARTMENT AND VILLAGE COMMUNITY GROUPS ARE TYPICALLY POSITIVE.

Figure 41: Staff Survey Interview Question # 33



Strongly Agree	47%
Agree	51%
Disagree	0%
Strongly Disagree	0%
N/A	2%

Figure 42: Elected & Community Survey Interview Question # 4

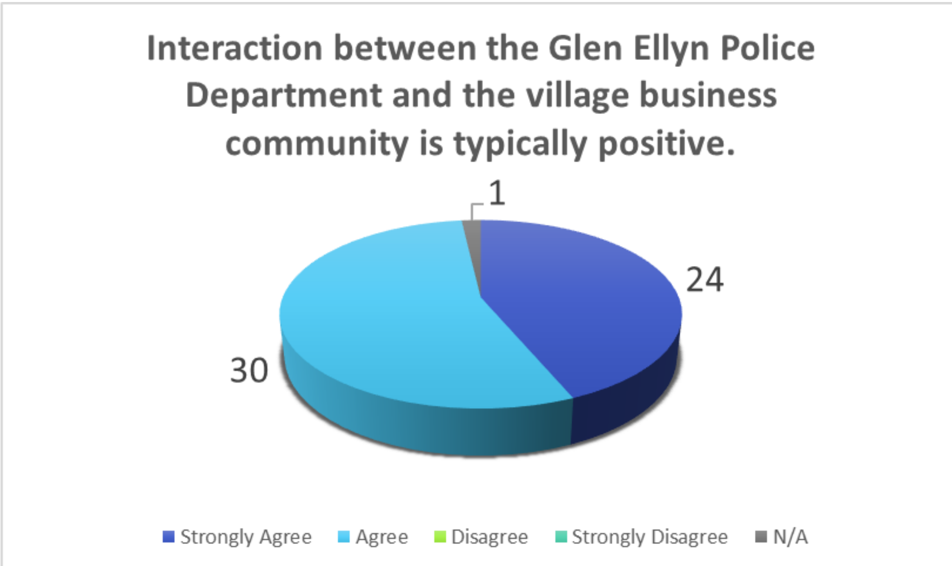


Strongly Agree	53%
Agree	44%
Disagree	0%
Strongly Disagree	0%
N/A	3%

Interaction between the Glen Ellyn Police Department and the village business community is typically positive. No one in either group disagreed.

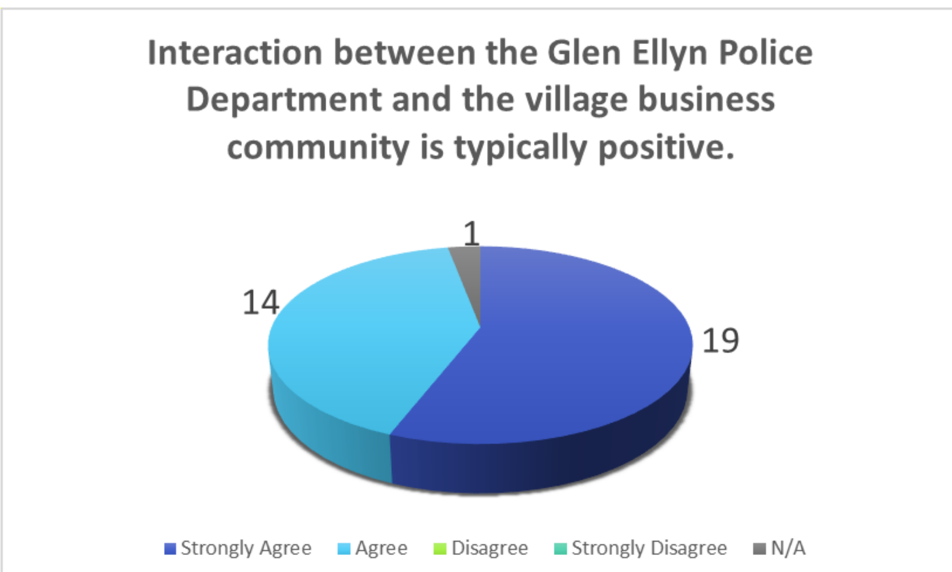
INTERACTION BETWEEN THE GLEN ELLYN POLICE DEPARTMENT AND THE VILLAGE BUSINESS COMMUNITY IS TYPICALLY POSITIVE.

Figure 43: Staff Survey Interview Question # 34



Strongly Agree	44%
Agree	55%
Disagree	0%
Strongly Disagree	0%
N/A	2%

Figure 44: Elected & Community Survey Interview Question # 5

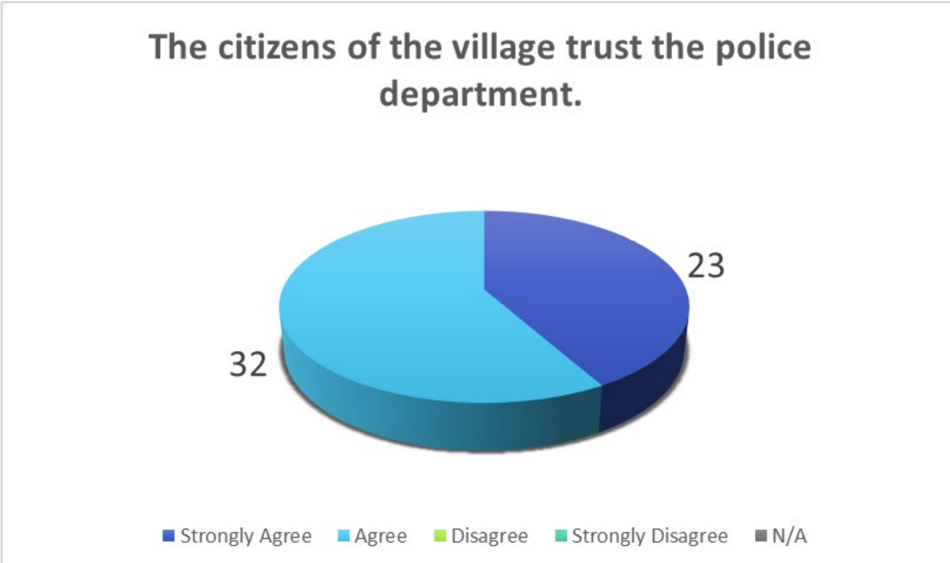


Strongly Agree	56%
Agree	41%
Disagree	0%
Strongly Disagree	0%
N/A	3%

The department and community are both aligned in their views of positive interaction with community groups, with the community providing an even stronger positive response than the department reported.

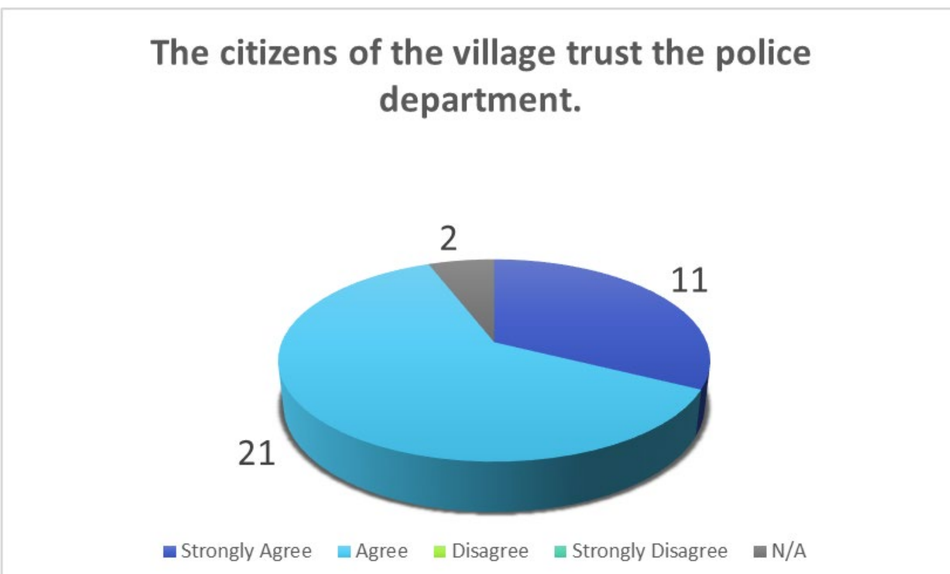
THE CITIZENS OF THE VILLAGE TRUST THE POLICE DEPARTMENT.

Figure 45: Staff Survey Interview Question # 35



Strongly Agree	42%
Agree	58%
Disagree	0%
Strongly Disagree	0%
N/A	0%

Figure 46: Elected & Community Survey Interview Question # 6

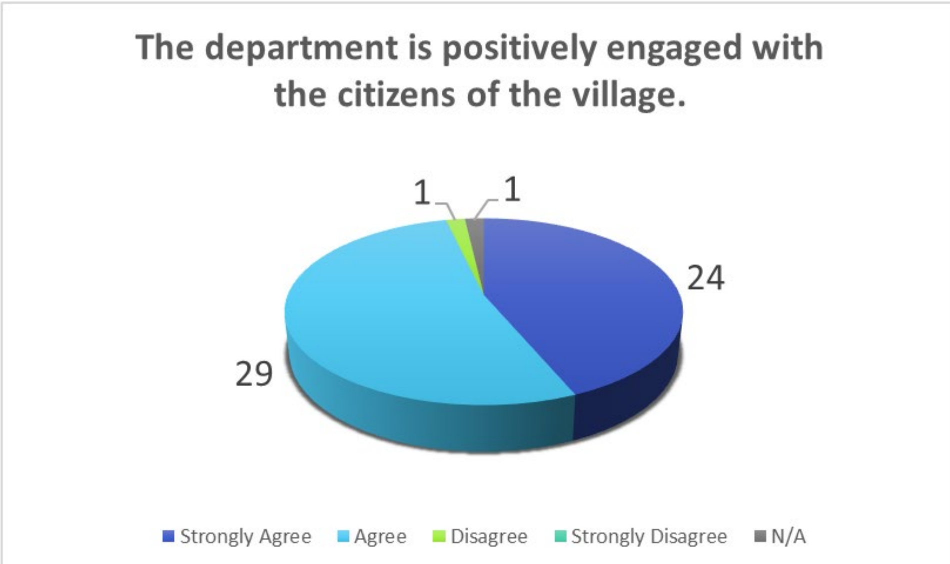


Strongly Agree	32%
Agree	62%
Disagree	0%
Strongly Disagree	0%
N/A	6%

The department and community are both aligned in their views of citizen trust with the department, with the department reporting a more positive response than the community reported.

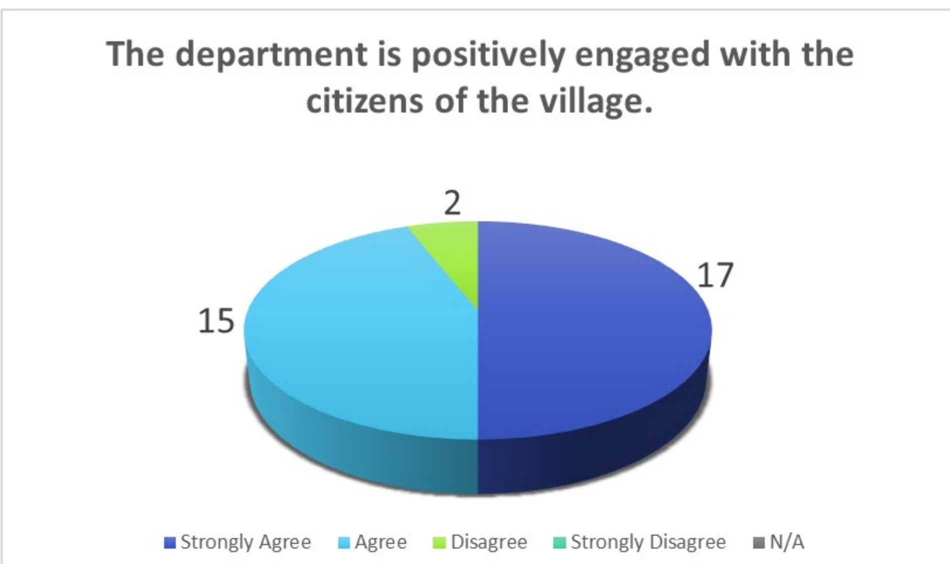
THE DEPARTMENT IS POSITIVELY ENGAGED WITH THE CITIZENS OF THE VILLAGE.

Figure 47: Staff Survey Interview Question # 36



Strongly Agree	44%
Agree	53%
Disagree	2%
Strongly Disagree	0%
N/A	2%

Figure 48: Elected & Community Survey Interview Question # 7

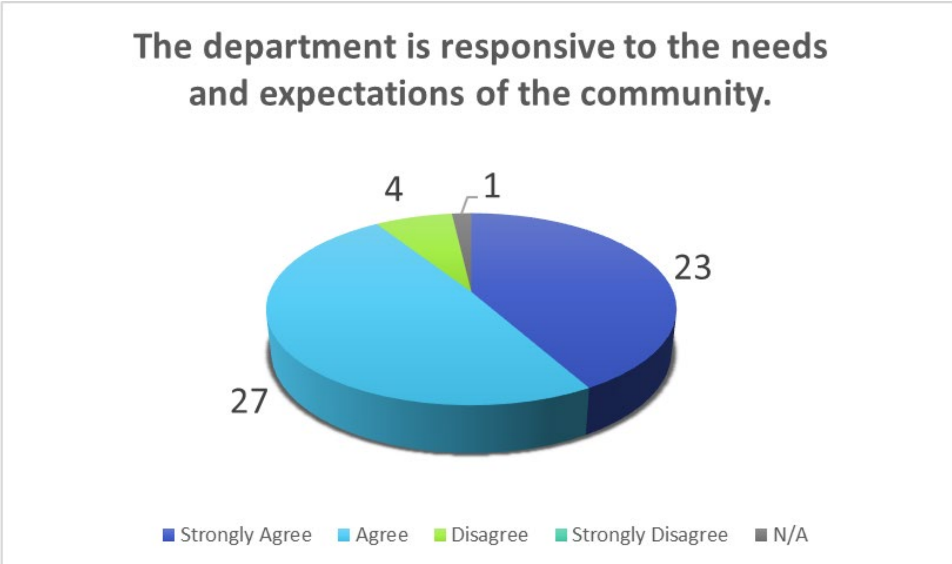


Strongly Agree	50%
Agree	44%
Disagree	6%
Strongly Disagree	0%
N/A	0%

The department and community are both aligned in their views of positive engagement with citizens, with the community reporting a more positive response than the department reported.

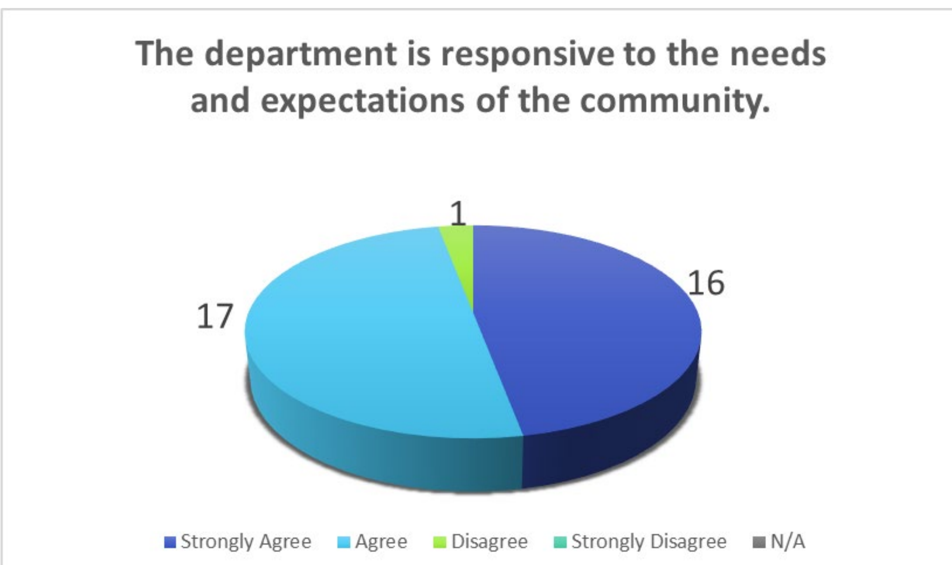
THE DEPARTMENT IS RESPONSIVE TO THE NEEDS OF THE COMMUNITY.

Figure 49: Staff Survey Interview Question # 37



Strongly Agree	42%
Agree	49%
Disagree	7%
Strongly Disagree	0%
N/A	2%

Figure 50: Elected & Community Survey Interview Question # 8



Strongly Agree	47%
Agree	50%
Disagree	3%
Strongly Disagree	0%
N/A	0%

The department and community are both aligned in their views of responsiveness and meeting the needs of the community, with the community reporting a more positive response than the department reported.

The overall results show that the staff of the department and the community members responded very similarly, and positively, regarding community support for the department, elected official support, interaction with citizens, community groups, and the business community. Furthermore, positive and similar results are found for issues including trust, engagement, and responsiveness. This current data corresponds to responses to the National Citizen Survey, Glen Ellyn Community Livability report, conducted in 2017. Resident respondents in that survey rated Community Safety as one of the top two of eight positive community facets. [xi]

The police department members described the relationship between the department and elected officials of the community in very positive terms. There were members who expressed a desire to improve the existing relationship with the community during the interviews. In delving further into these instances, consultants discovered that the specific comments regarding these issues were all related to the perceived need for additional staffing and the associated ability to provide further outreach to the community.

The department is a member of One Community, which is a group of adults that are dedicated to improving community and social relations. They meet on a regular basis to discuss topics for improvement. They have focused on students at Glenbard West and Glenbard South high schools. The group included students from both schools in discussions. The students expressed complete satisfaction with the school resource officer as well as positive interactions with other police officers. During survey interviews with community members, one of those interviewed was a member of the group. This person commented that during the height of the pandemic there was consideration to postpone the meetings. However, the police chief felt the meetings were too important to stop and they continued meeting via live video.

Community members commented that the department treats people with respect, are responsive, and can be trusted. A theme in responses also stressed the need for diversity; in its own staff as well as interaction with diverse citizenry.

The department embraces increased diversity and inclusion. In their employee recruiting process they have officers speak at colleges and universities, career fairs, and through social media. They focus on diversity in these processes.

RECOMMENDED ORGANIZATIONAL CHART AND STAFFING

After thorough assessment of the operations of the Glen Ellyn Police Department, as well as consideration of the current and future needs for policing services for the village, the following organizational structure and staffing needs are recommended.

- The department should restructure and clearly define the divisions of patrol, investigations, and support. Each of these divisions should be led by the new rank position of commander. The commanders will report directly to the deputy chief.

- Three new positions of patrol officer are recommended to be added to the patrol shifts. This will provide each shift with seven officers.

- An additional investigator should be added to the Investigations Division and will be designated as a mental health and community engagement investigator.

- The police program coordinator position should be staffed and funded.

- A new part-time position of civilian administrative assistant should be created and assigned to report the deputy chief. This position will also assist all division commanders upon the direction of the deputy chief.

- The crossing guards should be privatized through a third-party contract and employment will transfer to a private firm. Therefore, they will no longer be included in the organizational structure.

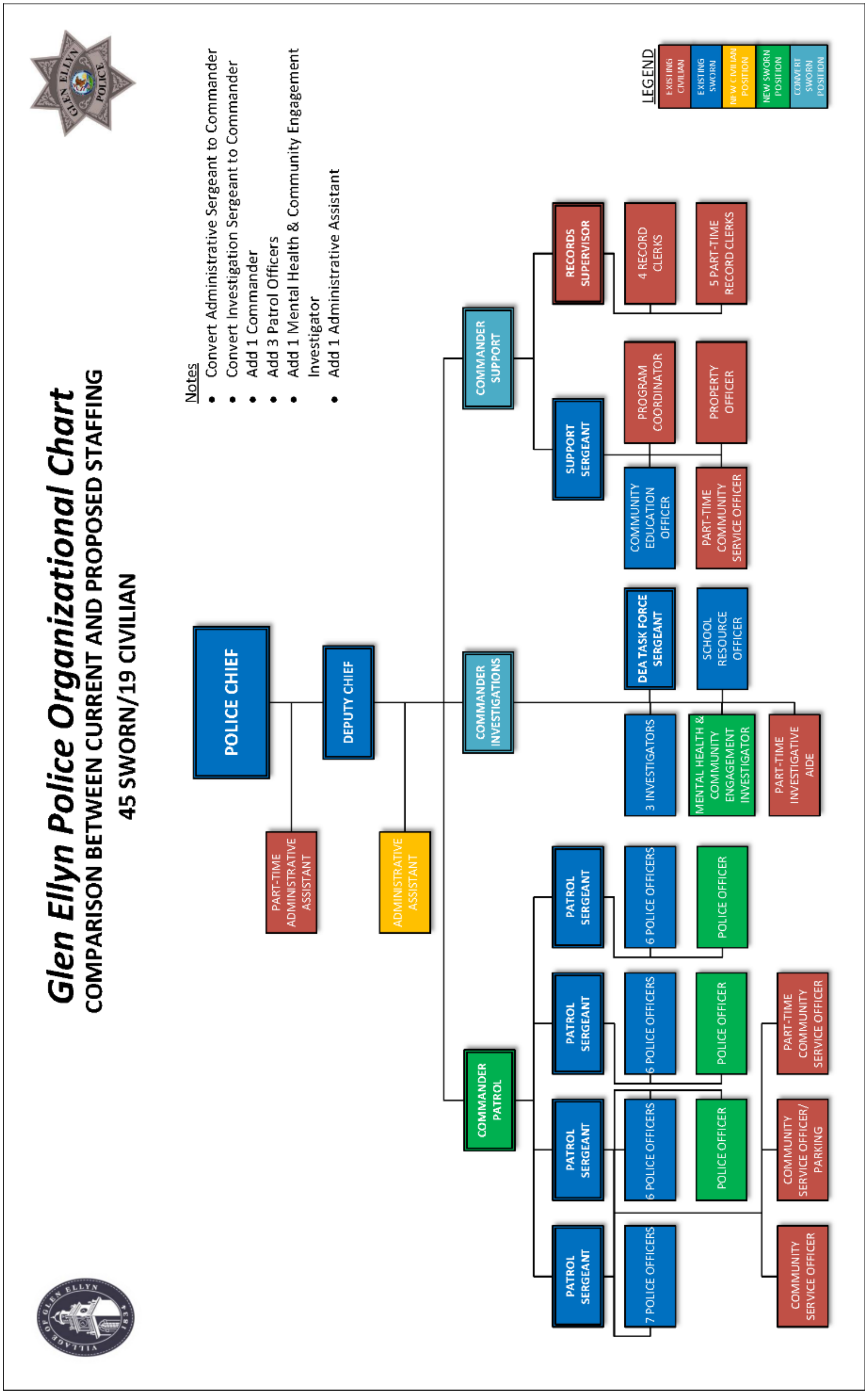
The estimated minimum personnel costs of the reorganization, additional positions, and transfer of crossing guards is shown below.

Table 21: Estimated Minimum Personnel Costs

Position/Description	Minimum Estimated Wage	Assumptions	FICA/MED	Police Pension	IMRF	Health Insurance	Total Cost
Commander 1	$ 126,211.80	2021 Grade S - 10% above average sergeant, within the range, Exempt Status	$1,830.07	$30,038.41	$0.00	$21,997.00	$180,077.28
Patrol 1	$ 66,092.96	Assuming new hire, no lateral, effective 11/1/2021 rate	$958.35	$15,730.12	$0.00	$21,997.00	$104,778.43
Patrol 2	$ 66,092.96	New hire, no lateral, effective 11/1/2021 rate	$958.35	$15,730.12	$0.00	$21,997.00	$104,778.43
Patrol 3	$ 66,092.96	New hire, no lateral, effective 11/1/2021 rate	$958.35	$15,730.12	$0.00	$21,997.00	$104,778.43
Administrative Assistant	$ 20,807.28	2021 Grade D, starting rate. PT up to 19 hours per week, 988 hours annually	$1,591.76	$0.00	$1,425.30	$0.00	$23,824.34
Commander 2	$126,211.80	2021 Grade S - 10% above average sergeant, within the range, Exempt Status	$1,830.07	$30,038.41	$0.00	$21,997.00	$180,077.28
Commander 3	$126,211.80	2021 Grade S - 10% above average sergeant, within the range, Exempt Status	$1,830.07	$30,038.41	$0.00	$21,997.00	$180,077.28
Sergeant 1 elimination	($115,044.80)	Promotion of a sergeant into commander	($1,668.15)	($27,380.66)	$0.00	($21,997.00)	($166,090.61)
Sergeant 2 elimination	($123,323.20)	Promotion of a sergeant into commander	($1,788.19)	($29,350.92)	$0.00	($21,997.00)	($176,459.31)
Patrol 4 (To replace 1-FTE transfer to Investigator)	$66,092.96	New hire, no lateral, effective 11/1/2021 rate	$958.35	$15,730.12	$0.00	$21,997.00	$104,778.43
Investigations Stipend	$1,500.00	Based on current CBA language	$21.75	$357.00	$0.00	$0.00	$1,878.75
Police Program Coordinator	$64,831.00	2021 Grade K, starting rate. FT 2080 hours	$4,959.57	$0.00	$4,440.92	$21,997.00	$96,228.50
Crossing Guard and Substitute Crossing Guards (10) elimination	($35,436.38)	Based on 2019 actual wages, pre-COVID, which is a typical year	($2,710.88)	$0.00	$0.00	$0.00	($38,147.26)
Private Service Contract	$22,872.25	Based on $19.10 per hour for 1197.5 hours	$0.00	$0.00	$0.00	$0.00	$22,872.25
Total Wages *^	**$479,213.39**		**$9,729.46**	**$96,661.14**	**$5,866.22**	**$131,982.00**	**$723,452.22**
			** FICA is 7.65% for non-sworn and 1.45% (medicare only) for sworn*	* Normal cost for police pension is 23.8%	* IMRF rate for 2022 is 6.85%	* Health insurance is assumed PPO Family - the most frequent selection.	

**Excludes equipment, uniform, training costs, overtime costs etc.*
^Excludes payouts, unemployment costs, etc.

Figure 51: Recommended Organizational Chart



APPENDIX A: EMPLOYEE SURVEY INTERVIEW QUESTIONS

1. Personnel are consistently assigned to specialty positions and/or assignments based on their skills, knowledge and abilities.
2. The process for assignment to specialty positions and/or assignments is consistent, clearly defined and followed.
3. The department Statement of Values is understood, promoted and followed by most personnel.
4. I receive adequate training relevant to my assignment.
5. I have been given the opportunity to receive continued training for my assignment.
6. The organizational structure is properly designed to provide a good flow of information between divisions and units of the department.
7. I clearly understand the chain-of-command.
8. The chain-of-command is routinely followed throughout the department.
9. The organizational structure is properly designed to provide an equitable distribution of work responsibilities.
10. The structure of the organization makes it clear who has responsibility for aspects of the department work.
11. Work is evenly distributed amongst employees within the department.
12. Work is evenly distributed amongst employees within my unit or division.
13. Equipment provided is good and allows me to perform my job efficiently.
14. Equipment provided is good and allows me to perform my job effectively.
15. Technology provided is good and allows me to perform my job efficiently
16. Technology provided is good and allows me to perform my job effectively.
17. Morale is good at the department.
18. The department or other village department offers outside Employee Assistance and/or wellness resources I would be comfortable using, if I ever needed.
19. The department offers assistance and/or wellness resources within the department I would be comfortable using, if I ever needed.
20. The department would support me and my family in the event that something happened in my personal life.
21. I believe that my supervisor consistently exhibits concern for my safety, success and well being.
22. Disciplinary issues are handled in a fair and consistent manner.
23. My performance evaluation process is constructive and meaningful.
24. The promotion process is handled in a fair and consistent manner.
25. Communication with my supervisor is consistent and informative.
26. My supervisor is available for guidance and instruction.

27. My supervisor encourages and respects my input.
28. I am satisfied with my work schedule.
29. I am satisfied with the ability of my work schedule to provide sufficient time off for me to meet my family and outside obligations.
30. The citizens and community members of Glen Ellyn support the department.
31. The elected officials of Glen Ellyn support the department.
32. Interaction between the Glen Ellyn Police Department and citizens are typically positive.
33. Interaction between the Glen Ellyn Police Department and village community groups are typically positive.
34. Interaction between the Glen Ellyn Police Department and the village business community is typically positive.
35. The citizens of the village trust the police department.
36. The department is positively engaged with the citizens of the village.
37. The department is responsive to the needs and expectations of the community.
38. In my current position I frequently interact and have contact with persons with mental health concerns
39. In my current position I frequently interact and have contact with persons with substance abuse concerns.

APPENDIX B: ELECTED AND COMMUNITY SURVEY INTERVIEW QUESTIONS

1. The citizens and community members of Glen Ellyn support the department.
2. The elected officials of Glen Ellyn support the department.
3. Interaction between the Glen Ellyn Police Department and citizens are typically positive.
4. Interaction between the Glen Ellyn Police Department and village community groups are typically positive.
5. Interaction between the Glen Ellyn Police Department and the village business community is typically positive.
6. The citizens of the village trust the police department.
7. The department is positively engaged with the citizens of the village.
8. The department is responsive to the needs and expectations of the community.
9. In one word what is the department's greatest strength?
10. In one word what is one thing the department could improve on?
11. What can the department do to better serve the needs and expectations of the community?
12. Is there anything else you would like to tell us to help complete this Police Assessment and Staffing analysis?

APPENDIX C: SURVEY OF COMPARABLES TABLE

Glen Ellyn Police Department Police Assessment and Staffing Analysis
Police Department Comparison - Sworn

						Management/Supervisors									Officers										Accreditation				
Department	Population	Total Authorized Sworn			Sworn Officers per thousand	Chief	Asst/Deputy Chief	Major	Captain	Lieutenant	Commander	Sergeant	Total Management	Percent Management of Total Sworn	Corporal	Investigator / Detective	K9 Officer	Police Officer			Other Rank	Crime Analyst-Sworn	Total Officers (FTE)	Officer/Supervisor Ratio	Accredited by CALEA	Accredited by ILEAP	Accredited by other organization	Investigators/ Detectives per thousand	Patrol Officers (incl. K9s) per thousand
		Full-Time	Part-Time	Total FTE														Full-Time	Part-Time	Total FTE									
Glen Ellyn	27,714	40	0	40	1.44	1	1	0	0	0	0	8	10	25.00%	0	3	0	27	0	27	0	0	30	3.00	No	No	No	0.11	0.97
Bartlett	41,487	59	0	59	1.42	1	2	0	0	0	3	7	13	22.03%	0	5	1	40	0	40	0	0	46	3.54	Yes	No	N/A	0.12	0.99
Batavia	26,250	41	0	41	1.56	1	2	0	0	0	4	3	10	24.39%	0	6	0	22	0	22	3	0	31	3.10	No	No	No	0.23	0.84
Bloomingdale	22,018	48	0	48	2.18	0	2	0	0	0	0	9	11	22.92%	0	5	0	32	0	32	0	0	37	3.36	No	No	No	0.23	1.45
Carol Stream	40,000	69	0	69	1.73	1	2	0	0	0	3	7	13	18.84%	4	7	0	45	0	45	0	0	56	4.31	No	No	No	0.18	1.23
Darien	21,304	34	0	34	1.60	1	1	0	0	0	0	5	7	20.59%	0	4	1	22	0	22	0	0	27	3.86	No	No	No	0.19	1.08
Geneva	21,495	37	0	37	1.72	1	0	0	0	0	2	7	10	27.03%	0	5	0	22	0	22	0	0	27	2.70	No	No	No	0.23	1.02
La Grange	15,322	28	3	29.5	1.93	1	1	0	0	0	3	3	8	27.12%	3	2	0	15	3	17	0	0	21.5	2.69	No	No	No	0.13	1.27
Lemont	17,291	22	4	24.0	1.39	1	0	0	0	0	2	4	7	29.17%	0	3	0	12	4	14	0	0	17	2.43	No	Yes	No	0.17	0.81
Lisle	23,431	38	0	38	1.62	1	2	0	0	0	0	5	8	21.05%	0	4	0	26	0	26	0	0	30	3.75	No	No	No	0.17	1.11
Roselle	23,298	32	0	32	1.37	1	1	0	0	0	0	6	8	25.00%	0	2	0	22	0	22	0	0	24	3.00	No	Yes	No	0.09	0.94
Westmont	24,600	41	0	41	1.67	1	2	0	0	0	0	8	11	26.83%	0	4	0	26	0	26	0	0	30	2.73	No	Yes	No	0.16	1.06
Woodridge	32,971	51	0	51	1.55	1	2	0	0	0	0	7	10	19.61%	0	6	0	35	0	35	0	0	41	4.10	No	No	No	0.18	1.06

Glen Ellyn Police Department Police Assessment and Staffing Analysis
Police Department Comparison - Civilian

Department	Population	Total Authorized Civilians			Crossing Guards Police Department Employees or Outside	Director of Public Safety	Administrative Assistant to Chief	Administrative Assistant-Other Area	Administrative Program Coordinator	Community Service Officer	Crime Analyst-Civilian	Evidence & Property Custodian	Investigations Aide	Parking Control Officer	Records Supervisor	Records Clerks			Records Employees/ Sworn Ratio	Desk Officer	Social Worker	Accreditation Manager	Other - Civilian	Total Civilians/Sworn Ratio
		Full-	Part-Time	Total FTE												Full-Time	Part-Time	Total FTE						
Glen Ellyn	27,714	9	9	13.5	Police Department Employees	0	1 PT	0	1	1 FT, 2 PT	0	1	1 PT	1	1	4	5	6.5	0.188	0	0	0	0	0.338
Bartlett	41,487	17	3	18.5	Police Department Employees	0	1	1- Investigations	0	4	0	1	0	1 PT	1	8	2	9	0.169	0	0	1	2 PT Data Entry	0.314
Batavia	26,250	8	5	10.5	None	0	1	0	0	1	0	1 PT	0	0	1	5	4	7	0.195	0	By Contract	0	0	0.256
Bloomingdale	22,018	12	4	14	None	1	1	1	0	1	0	1 CSO	0	0	1	3	1	3.5	0.094	0	0	0	3 Aides FT, 3 PT	0.292
Carol Stream	40,000	22	1	22.5	None	0	1	3	1	5	0	1	0	0	1	6	1	6.5	0.109	0	3	0	1 Community Affairs Spec.	0.326
Darien	21,304	5	5	7.5	None	0	0	1	0	3 PT	0	1 PT	0	0	0	4	1	4.5	0.132	0	0	0	0	0.221
Geneva	21,495	13	5	15.5	Both - Employee & Contract	0	1	0	0	2	0	0	0	0	1	9	5	11.5	0.338	0	By Contract	0	0	0.419
La Grange	15,322	5	0	5	Outside Private Contract	0	0	0	0	0	1	0	0	2	0	1	0	1	0.034	0	0	0	1 Parking Clerk	0.169
Lemont	17,291	5	3	6.5	Police Department Employees	0	1	0	0	1	0	0	0	0	1	1	3	2.5	0.146	0	0	0	1 Public Saftety Spec.	0.271
Lisle	23,431	8	5	10.5	None	0	1 PT	0	0	3 FT, 2 PT	0	1	0	0	1	3	2	4	0.132	0	0	0	0	0.276
Roselle	23,298	9	2	10	None	0	1	0	1 PT	4	0	1 PT	0	0	1	3	0	3	0.125	0	By Contract	0	0	0.313
Westmont	24,600	4	0	4	Outside Private Contract	0	1	0	0	1	0	0	1	0	0	1	0	1	0.024	0	0	0	0	0.098
Woodridge	32,971	8	2	9	Police Department Employees	0	1	0	0	2 FT, 1 PT	1	1 PT	1	0	1	2	0	2	0.059	0	0	0	0	0.176

APPENDIX D: TABLE OF CONSULTANT RECOMMENDATIONS

SECTION	RECOMMENDATION	PRIORITY
Administration	Modify the organizational structure by creating a supervisory layer of commander between the deputy chief and subordinates.	2
Administration	Create the divisions of patrol, investigations and support to be supervised by division commanders.	2
Administration	Create the part-time position of administrative assistant to be supervised by the deputy chief.	2
Equipment	Begin initial research into implementation of body cameras for officers.	3
Human Resources	Allocate administrative functions related to the hiring process to a qualified civilian human resource professional or other confidential administrative staff to allow the sergeants the opportunity to focus on other operational demands.	2
Human Resources	Incorporate personality testing into the department's hiring process.	3
Human Resources	Ensure BFPC members are trained/educated on operational and human resources perspectives and understand the preferred qualities in applicants.	2
Human Resources	Incorporate command staff and human resources into the BFPC interviewing processes to allow for the inclusion of subject matter experts.	2
Human Resources	Pursue non-cognitive assessments within the hiring process to attempt to better match applicants to department success. IOS has options consider to incorporate into the current application process.	3
Human Resources	Establish a baseline of non-cognitive characteristics from the current officers to identify the successful indicators of the organization.	3
Human Resources	Utilize the Seven Tests of Just Cause when considering discipline.	2
Human Resources	Create and adopt a disciplinary matrix to be used as a guide for disciplinary consistency.	2
Human Resources	Create and use a discipline log to be maintained in the office of the chief of police.	2
Human Resources	Review the disciplinary log annually to ensure consistency of discipline.	2
Human Resources	Assign internal investigations to the function of the Support Division after restructuring.	2

SECTION	RECOMMENDATION	PRIORITY
Investigation Section	A formal screening system using solvability factors should be developed to guide the supervisor to determine what cases are assigned to investigators for follow-up.	3
Investigation Section	The department should consider outsourcing all aspects of the background investigation that can be performed by an appropriate vendor.	3
Investigation Section	Patrol should be staffed sufficiently so that investigators are not regularly called upon for backfill.	2
Investigation Section	Create the additional position of mental health and community engagement investigator and place within the new Investigations Division.	2
Organizational Structure and Staffing	The department should modify the organizational structure as well as add staff. The specifics are provided in other sections of the report.	2
Patrol Division	The police administration should review the practice of having a second officer being present during routine arrestee searches in lock-up.	2
Patrol Division	The Records Section should be required to perform prisoner checks in place of supervisors.	2
Patrol Division	The department should review department policy 901 for opposite sex searches and update it to include requiring officers that they be recorded on video and audio when conducting an opposite sex search when a same sex officer or another officer is not available.	2
Patrol Division	Transition to a private service provider of school crossing guard services.	2
Patrol Division	To improve ability to consistently staff appropriately it is recommended that three additional patrol officers be added to the force to have seven officers assigned to each shift.	2
Patrol Division	Staff the position of patrol commander to relieve some of the administrative duties of patrol sergeants to allow them more actual supervisory time.	2
Policies and Procedures	The duties of policy development should be placed under the direction of the Support Division when implemented. The primary responsibility should be assigned to the position of police program coordinator.	2
Policies and Procedures	Conduct a comprehensive review of the Policy Manual by department command staff and insure the policy manual be amended to reflect any such changes made by the department pursuant to consultants' recommendations and the House Bill 3653.	2
Policies and Procedures	The pursuit policy should be periodically reviewed in detail by command staff to eliminate any contradictory language and	2

SECTION	RECOMMENDATION	PRIORITY
	specifically identify to whom the duties and responsibilities created by the policy are assigned.	
Policies and Procedures	Requirements for coordinated searches, with or without a canine, in cases of high-risk missing persons be included in the Missing Persons policy unless the supervisor makes a determination that the circumstances do not justify a search.	2
Policies and Procedures	The Annual Bias Based Profiling Report should be reviewed by the chief of police to identify any changes in training or operations that should be made to improve service.	2
Policies and Procedures	Establish procedures for complying with statutory reporting requirements for incidents involving contact with persons experiencing a mental health crisis.	2
Policies and Procedures	Reporting requirements related to contacts with persons experiencing mental health crisis should be placed under the Support Division upon reorganization of department structure.	2
Policies and Procedures	Prepare and include Chapter Eight, which includes a section on property and evidence, into the department manual. This should be the responsibility of the Support Division when that division is developed.	2
Support Division	The primary function of training should be under the command of the Support Division commander who will oversee the police program coordinator and support sergeant upon reorganizing the organizational chart.	3
Support Division	The training committee should expand membership to a cross section of the department by rank, civilian and sworn, and divisions.	3
Support Division	The commander of the Support Division should be assigned as the chairperson of the training committee and the police program coordinator should be a mandatory member.	3
Support Division	The training plan and mandated training section of the policy should be amended to ephasize training for all members of the department, not limited to sworn members.	3
Support Division	The mandated training section of the policy should be amended to add training required by Federal law as well as department and village policies, rules and regulations.	3
Support Division	The police program coordinator should be staffed.	2
Support Division	A part-time administrative assistant should be staffed and assigned under the supervision of the deputy chief. Duties of this position will include responsibilities to assist with the clerical duties of the training function.	2

SECTION	RECOMMENDATION	PRIORITY
Support Division	The position of administrative assistant, recommended to be supervised by the deputy chief, should be assigned to assist in the Records Section as needed.	2
Support Division	Following significant implementation of recommendations contained in this report, the administration should consider accreditation.	3
Support Division	If accreditation is to be pursued in the future, the first step is to pursue ILEAP Tier One accreditation.	3
Support Division	Accreditation responsibilities, if implemented, should be assigned to the position of police program coordinator.	3
Support Division	Explore engaging with other area police departments to share contracting for social service needs.	2
Support Division	Assign the responsibility of internal affairs investigations to the Support Division after restructuring	2
Support Division	Policy 1008, Personnel Complaints, should be revised to reflect accurate titles and the responsibilities of the Support Division related to internal affairs.	2
Support Division	Fill the position of police program coordinator and maintain emergency management responsibilities with this position.	2
Support Division	The position of administrative assistant, recommended to be supervised by the deputy chief, should be assigned to assist in the Records Section as needed.	2
Technology	Continue to explore technologies that make the work process efficient and effective.	3

APPENDIX E: REFERENCES

[i] Cordner, Gary W. (2014). “Police Administration (8th edition), page 123”. Elsevier Publishers.

[ii] FBI - Table 71. (2021, 04 27). Retrieved from FBI: UCR: https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/topic-pages/tables/table-71

[iii] FBI - Table 78. (2021, 04 27). Retrieved from FBI: UCR: https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/tables/table-78/table-78-state-cuts/illinois.xls

[iv]

Wilson, J. M., & Weiss, A. (2014). *A Performance-based Approach to Police Staffing and Allocation.* Washington, DC: Office of Community Oriented Policing Services, U.S. Department of Justice.

[v]

Wilson, J. M., & Weiss, A. (2014). *A Performance-based Approach to Police Staffing and Allocation.* Washington, DC: Office of Community Oriented Policing Services, U.S. Department of Justice.

[vi] FBI - Table 1. (2021, 05 01). Retrieved from FBI: UCR: https://ucr.fbi.gov/crime-in-the-u.s/2019/crime-in-the-u.s.-2019/topic-pages/tables/table-1

[vii] Graydon Megan (February 25,2020) Chicago Tribune. ‘In cost-saving move, Elmhurst to contract with private company for crossing guard services’ (Website) https://www.chicagotribune.com/suburbs/elmhurst/ct-dob-elmhurst-crossing-guard-tl-0227-20200225-wjxk7dhuajcihgowpf2rlgroj4-story.html accessed 17 March 2021

[viii]Hanover Park Village Board Meeting 10/1/2020 Agenda, Item 6-A.8 (Website.) https://www.hpil.org/AgendaCenter/ViewFile/Agenda/_10012020-1272 accessed 17 March 2021

[ix] Latta, J. (2019, January). *International Association for Property and Evidence, Inc. Professional Standards.* Retrieved from iape.org: https://home.iape.org/resourcesPages/IAPE_Downloads/IAPE_Resources/IAPE-Professional-Standards/IAPE_Standards_3.0.pdf

[x] *Executive Order on Safe Policing for Safe Communities.* Issued by the White House. June 16, 2020.

[xi] The National Citizen Survey Glen Ellyn, IL. Community Livability Report 2017. National Research Center, Inc.

Glen Ellyn Village Board
535 Duane Street
Glen Ellyn, IL 60137

Meeting 8/30/2021 7:00 PM
Department: Finance
Department Head:
Category: Report
Prepared By:

AGENDA ITEM (ID # 2021-1368)

DOC ID: 2021-1368

Finance Director Coyle will present the second quarter financial report.

Statement of the Issue:
Please see the attached report.

Analysis:
N/A

Budget Impact:
N/A

Action Requested:
N/A - Item is discussion only

Attachments:

1. 2Q2021 Financial Report

VILLAGE OF Glen Ellyn ILLINOIS

Mid Year Financial Report 2021

For the period January 1, 2021 to June 30, 2021

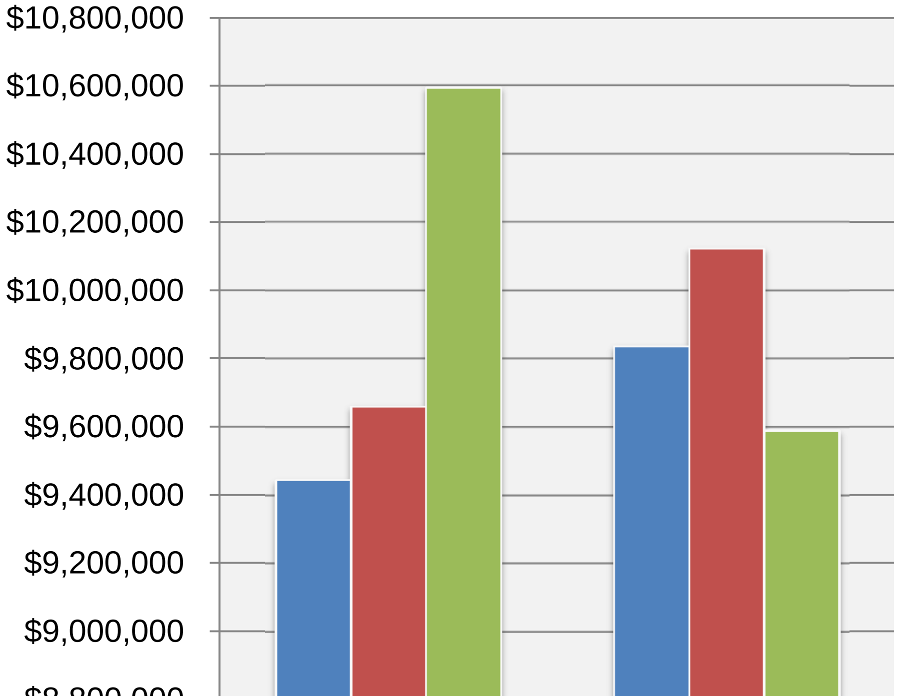
535 DUANE STREET • GLEN ELLYN, IL 60137 630.469.5000 • WWW. GLENELLYN.ORG

ABOUT THIS REPORT

- Covers the period January 1, 2021 to June 30, 2021, unless noted
- Unaudited
- Budget basis (cash basis)
- Report will be made available on the Village website

General Fund

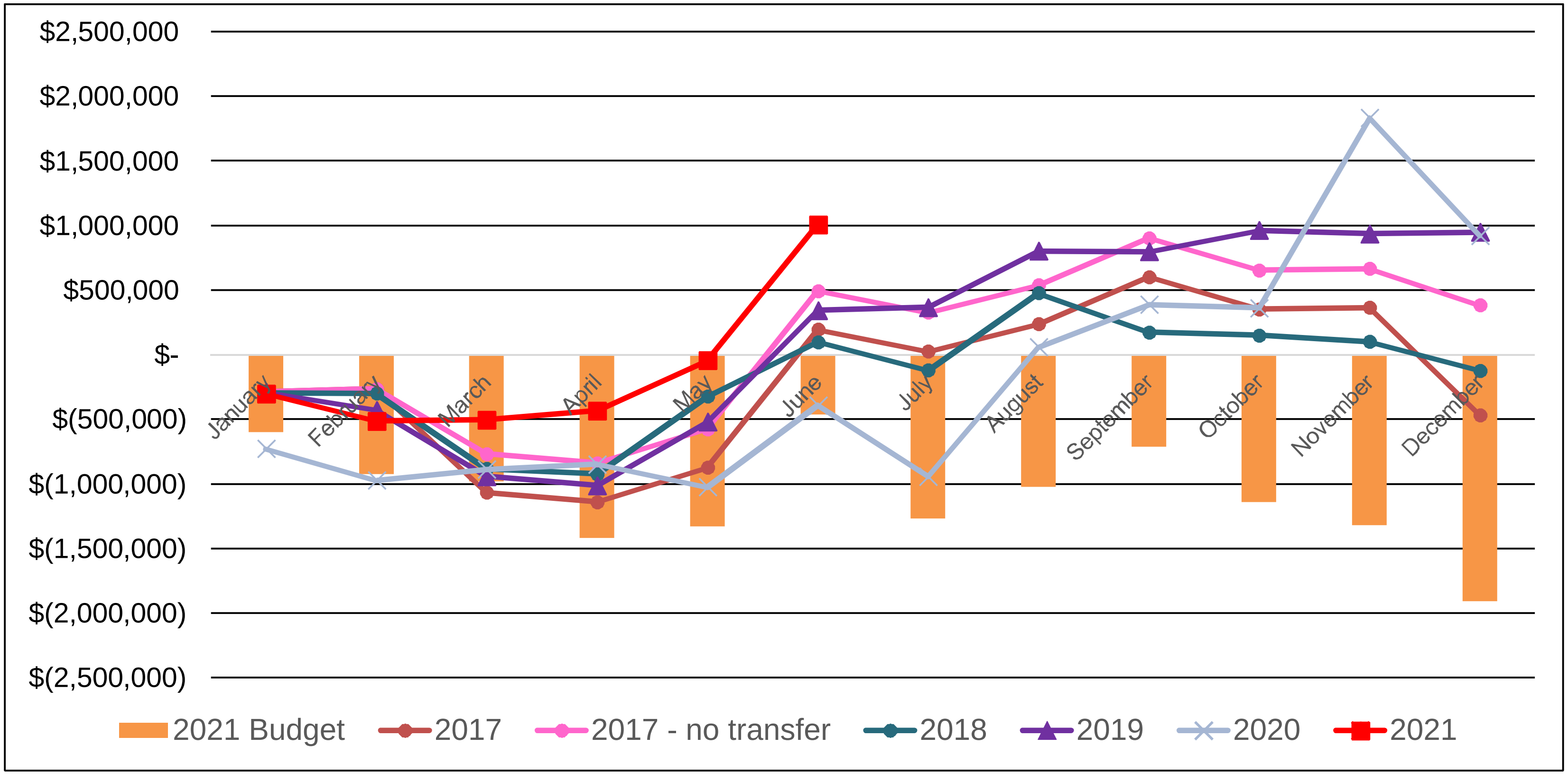
General fund mid year results



	Revenues, year to date	Expenditures, year to date
Last year	9,444,833	9,837,289
Budget	9,660,232	10,122,181
Current year	10,596,429	9,590,283

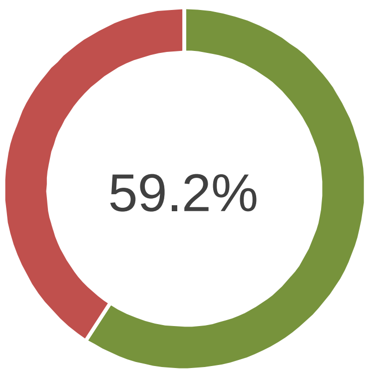
- Revenues exceed prior year
  - Income tax is $600K ahead of prior year and budget
- Expenditures are below prior year and budget
  - Personnel is trending $500K below budget. Turnover has created a positive budget variance, but creates negative impacts on productivity and morale.

General Fund – 5 year historical trend – Cumulative Change in Fund Balance – through June 2021



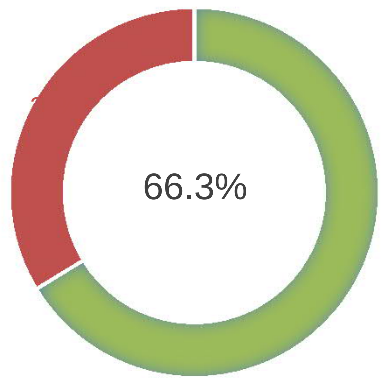
General Fund – Key Revenues as % of Budget – June 30, 2020

Sales Tax Meter



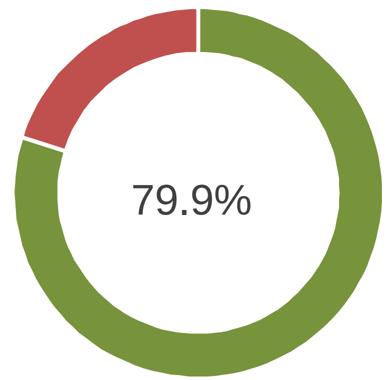
Target
49.7%

HR Sales Tax Meter



Target
49.0%

Income Tax Meter



Target
55.9%

All key revenues are above target

General Fund Expenditure Trends – From Budget

Positive

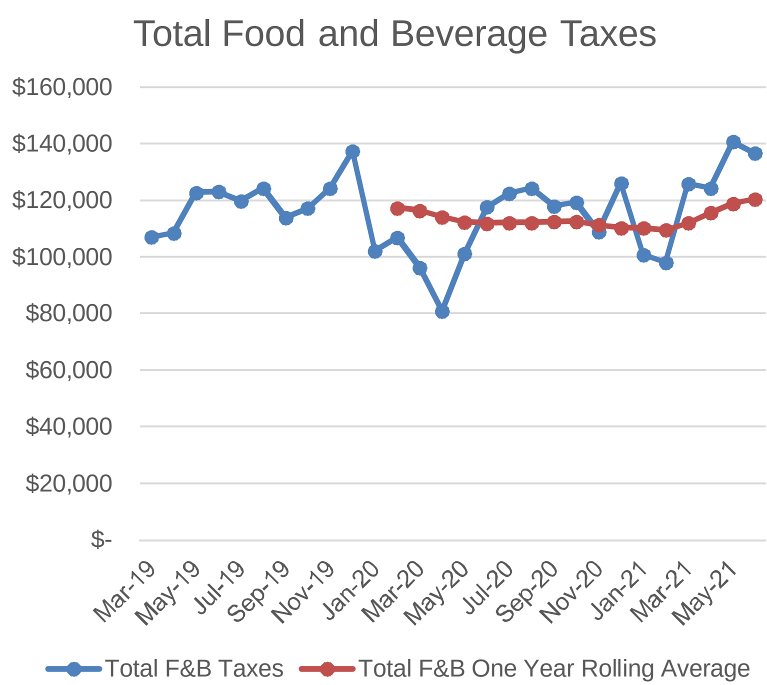
Department	Amount below YTD Budget	Reason
Village Manager	$92,688 / 15%	Lower Covid expenditures compared to 2020
I.T.	$70,807 / 18%	Hiring of additional staff did not occur at beginning of 2021.
Planning	$30,111 / 11%	Staff turnover and vacancies have lowered personnel costs.
Police	$169,907 / 4%	Staff turnover and vacancies have lowered personnel costs.

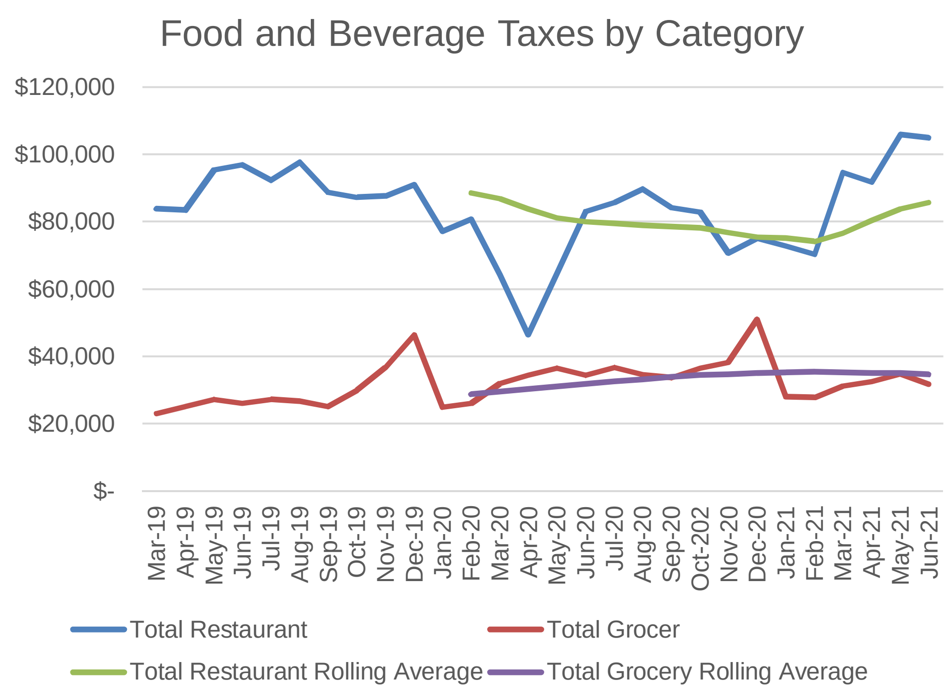
Negative

EMS	$75,697/29%	Issued a $69K payment to true up costs under the current contract.
Streets	$16,998 / 3%	A snowy start to 2021. A snowy end would further put the dept above budget.

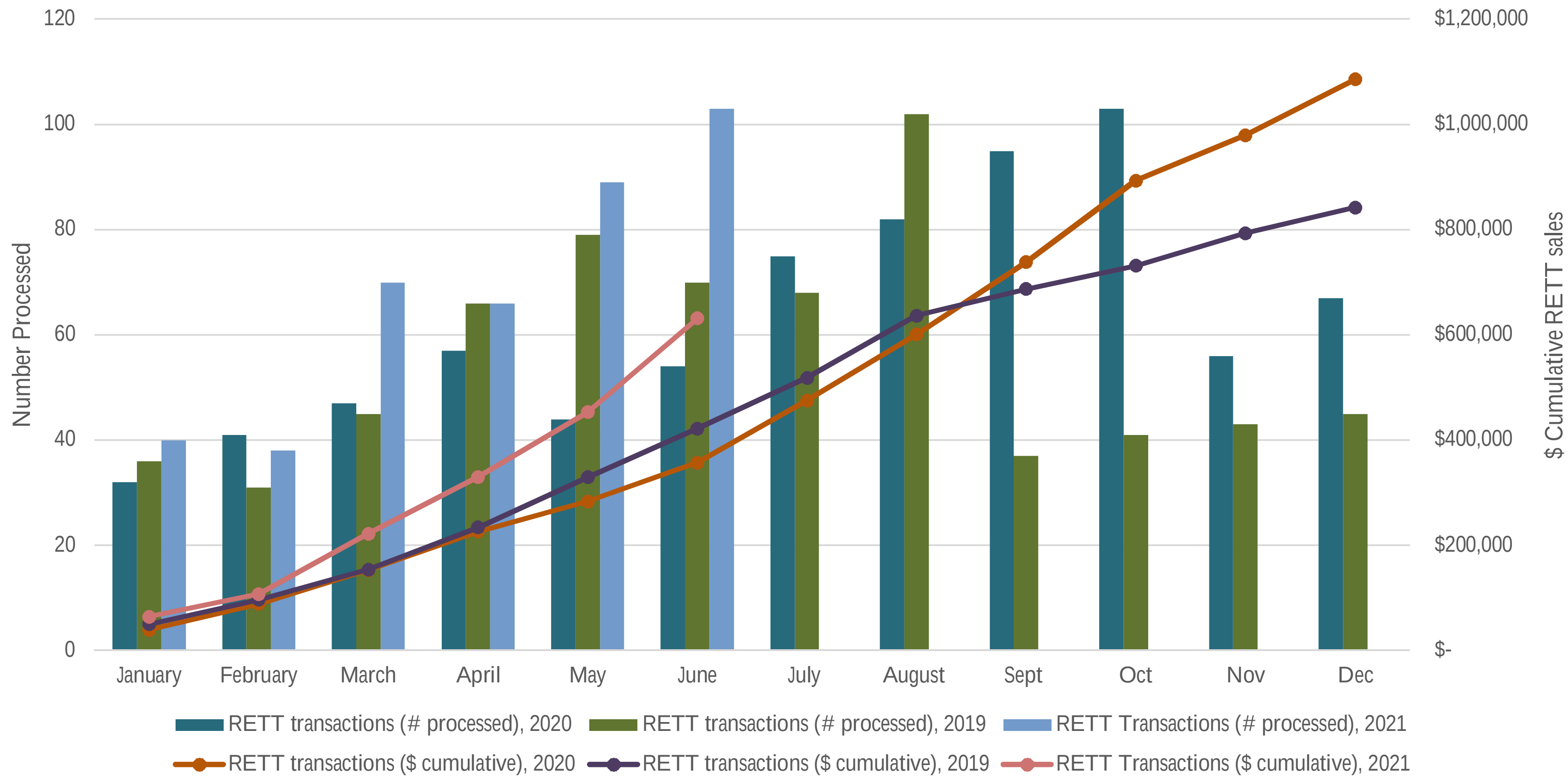
Other Notable Items

Food & Beverage





Real Estate


120
100
80
60
40
20
0
Number Processed
$1,200,000
$1,000,000
$800,000
$600,000
$400,000
$200,000
$-
$ Cumulative RETT sales
January
February
March
April
May
June
July
August
Sept
Oct
Nov
Dec
RETT transactions (# processed), 2020
RETT transactions (# processed), 2019
RETT Transactions (# processed), 2021
RETT transactions ($ cumulative), 2020
RETT transactions ($ cumulative), 2019
RETT Transactions ($ cumulative), 2021

Other Funds

CBD TIF

- 117K has been spent on Façade Awards and $207K has been approved but not paid. A budget amendment is suggested for the September 13 meeting.

General Fund/Corp Reserve/Roosevelt Road

- The Village has committed $2.85M to purchase hotels on Roosevelt Road. A budget amendment will be needed for this purchase. The closing has not yet occurred

Forfeiture Fund

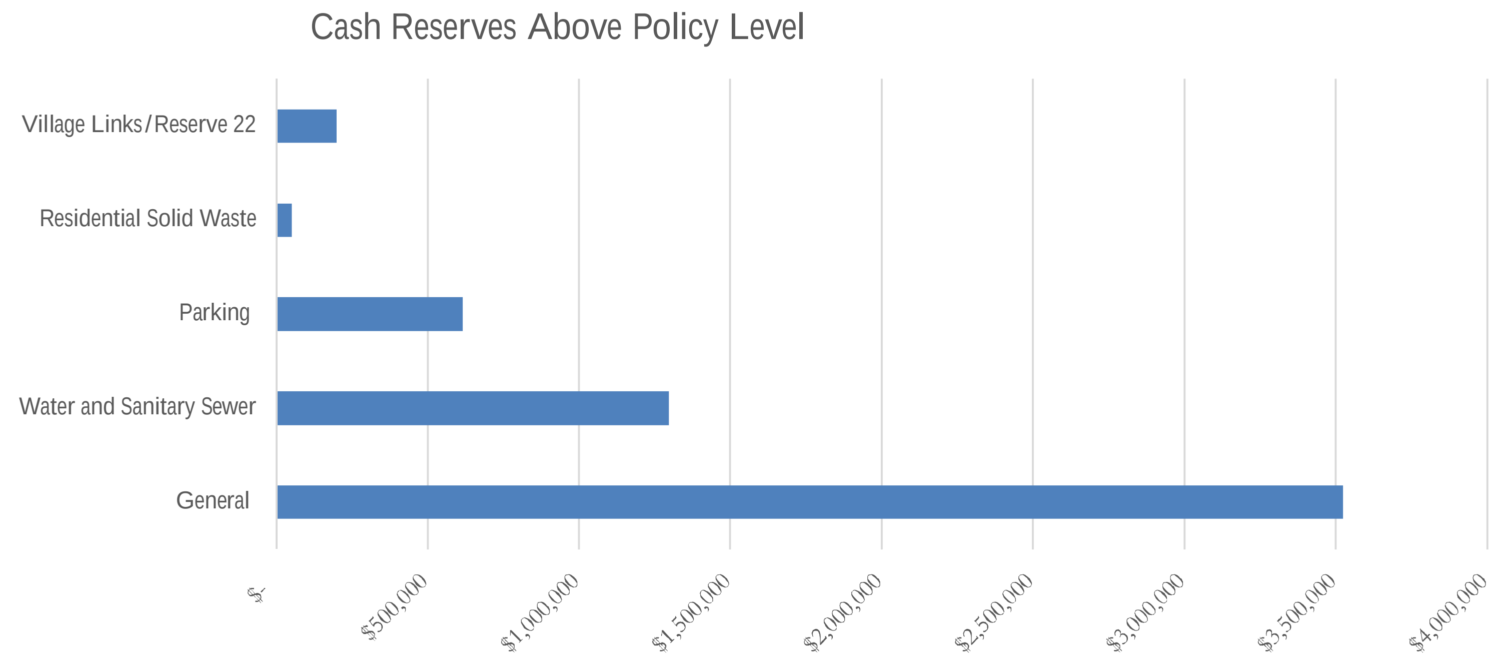
- Delays from the federal government in processing claims have reduced the cash balance in this fund. This may delay new projects until funding is received.

Village Links/Reserve 22

- See the Manager's Report and Financial Statements attached for June 2021.

VILLAGE OF Glen Ellyn ILLINOIS

Cash Reserves



- June is a high point for the cash reserves for the General Fund as the first property tax distribution is received June 1.
- The Village Links/Reserve 22 Fund has the highest cash balance since June 2017 and finally exceeds policy.

POLICE PENSION INVESTMENT PERFORMANCE

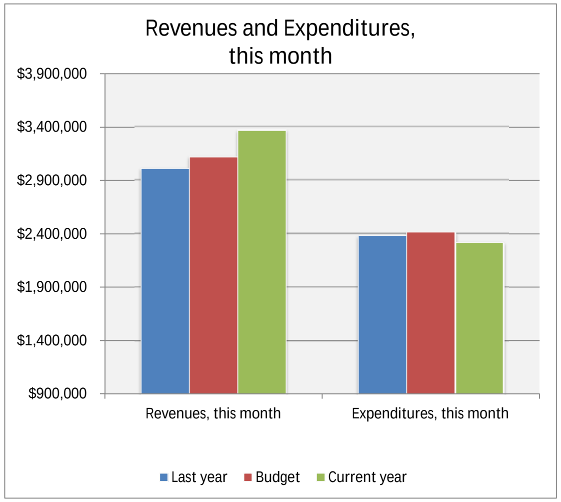
	3mo	YTD	1 YR	3 YR	5 YR	10 YR
Fund performance, net of fees	4.2%	7.5%	22.3%	9.0%	8.2%	6.6%

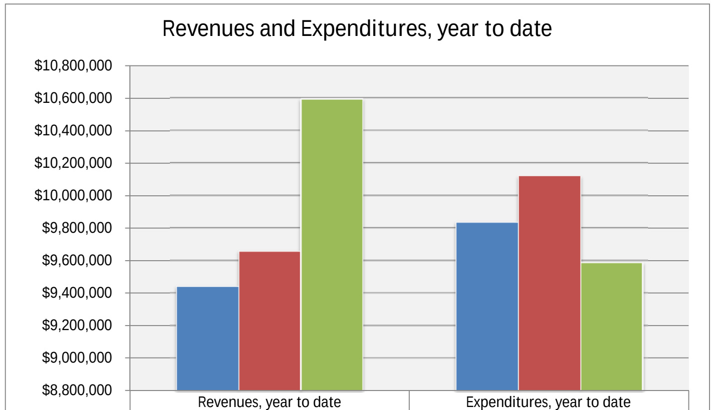
Long term target – 6.5%

- Marquette Associates took over management of the portfolio in January 2017

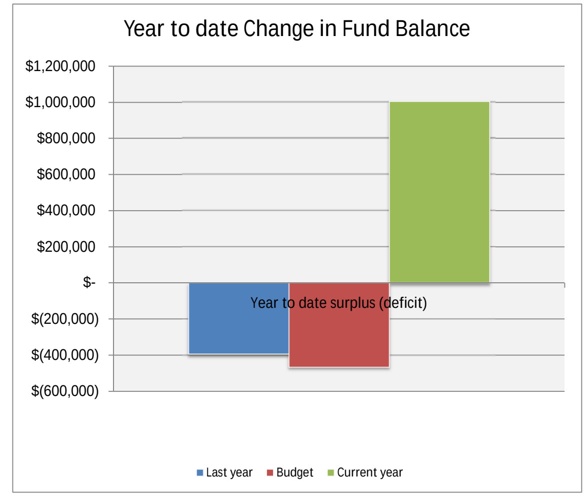
ATTACHMENT A – GENERAL FUND UPDATE – JUNE 30, 2020

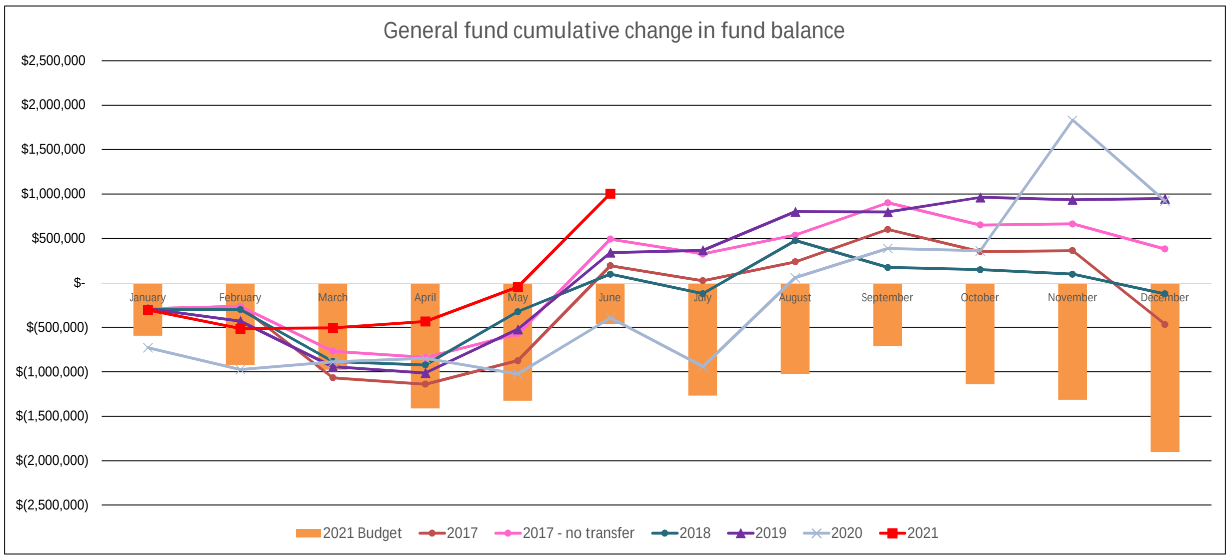
General Fund Budget Summary
For the Period Ended June 30, 2021





	Revenues, year to date	Expenditures, year to date
Last year	9,444,833	9,837,289
Budget	9,660,232	10,122,181
Current year	10,596,429	9,590,283

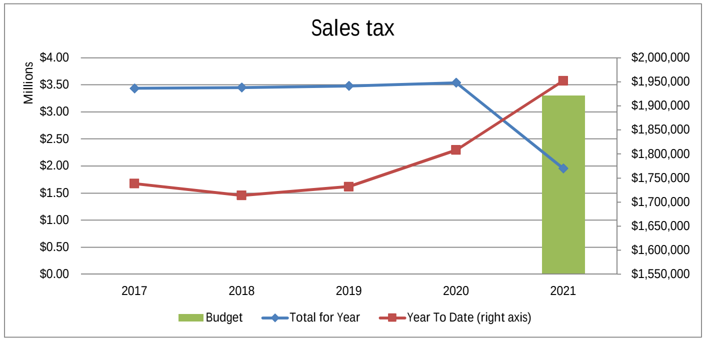


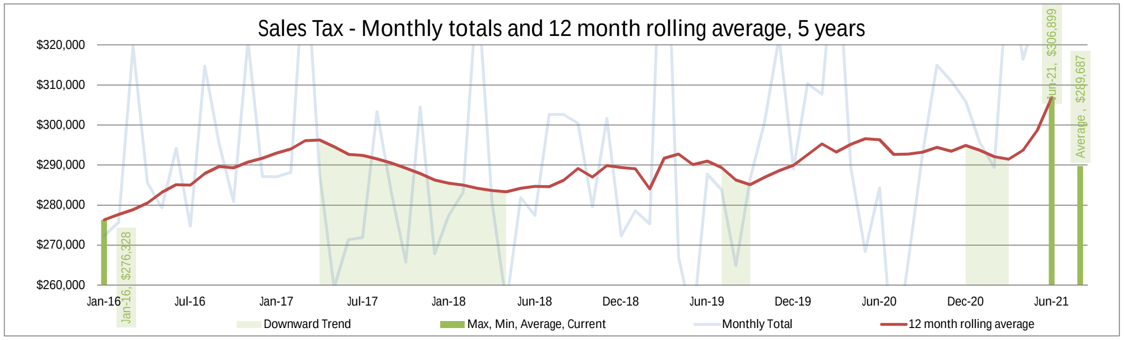


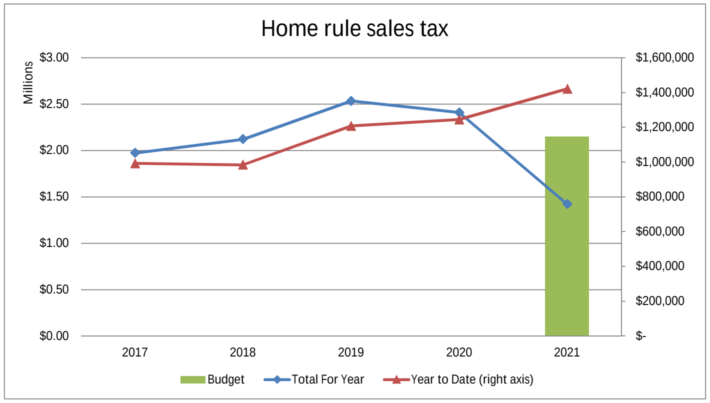
General Fund Budget Summary
For the Period Ended June 30, 2021

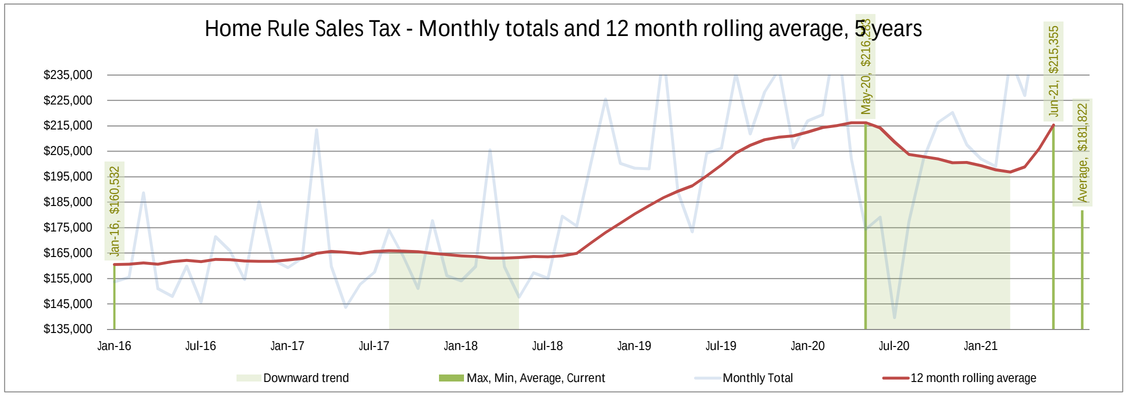
	MONTH							YTD						
	Last Year	Current Budget	Current Year	Variance from LY $	Variance from LY %	Variance from Budget $	Variance from Budget %	Last Year	Current Budget	Current Year	Variance from LY $	Variance from LY %	Variance YTD Budget $	Variance YTD Budget %
REVENUES														
TAXES														
Property Tax	1,768,452	1,733,022	1,561,431	(207,021)	-12%	(171,591)	-10%	1,817,996	1,879,648	1,802,183	(15,813)	-1%	(77,465)	-4%
Econ Dev SSA Tax	70,700	80,308	71,464	764	1%	(8,844)	-11%	72,297	80,332	78,791	6,494	9%	(1,541)	-2%
Sales Tax	284,324	269,400	382,199	97,875	34%	112,799	42%	1,808,426	1,642,374	1,952,508	144,082	8%	310,134	16%
Home Rule Sales Tax	179,161	167,607	291,288	112,127	63%	123,681	74%	1,244,596	1,042,488	1,420,759	176,163	14%	378,271	27%
State Income Tax	173,403	177,659	409,953	236,550	136%	232,294	131%	1,449,855	1,467,695	2,039,419	589,564	41%	571,724	28%
Other Taxes	215,697	103,091	203,070	(12,627)	-6%	99,979	97%	790,001	900,153	915,814	125,813	16%	15,661	2%
Subtotal Taxes	2,691,737	2,531,086	2,919,405	227,668	8%	388,319	13%	7,183,171	7,012,689	8,209,474	1,026,303	14%	1,196,785	15%
LICENSES & PERMITS														
Vehicle Licenses	18,458	12,612	21,816	3,358	18%	9,204	73%	281,042	319,220	289,920	8,878	3%	(29,300)	-10%
Business Registration	255	1,510	-	(255)	-100%	(1,510)	-100%	7,185	10,246	-	(7,185)	-100%	(10,246)	100%
Liquor Licenses	3,784	77,848	88,075	84,291	2228%	10,227	13%	3,824	122,327	88,538	84,714	2215%	(33,789)	-38%
Building Permits/Reg./Fees	67,954	122,937	96,884	28,930	43%	(26,053)	-21%	570,790	506,257	488,308	(82,482)	-14%	(17,949)	-4%
Subtotal Licenses & Permits	90,451	214,907	206,775	116,324	129%	(8,132)	-4%	862,841	958,049	866,766	3,925	0%	(91,283)	-11%
CHARGES & FEES														
Cable Franchise Fees	-	-	-	-	0%	-	0%	272,080	287,500	268,458	(3,622)	-1%	(19,042)	-7%
Ambulance Service Fees	25	-	-	(25)	-100%	-	0%	50	-	-	(50)	-100%	-	0%
Police Service Reimbursements	1,490	6,147	18,965	17,475	1173%	12,818	209%	26,626	30,683	41,189	14,563	55%	10,506	26%
Reimbursements - Other Agencies	11,286	10,777	11,543	257	2%	766	7%	67,716	73,852	69,258	1,542	2%	(4,594)	-7%
Subtotal Charges & Fees	12,801	16,925	30,508	17,707	138%	13,583	45%	366,472	392,035	378,905	12,433	3%	(13,130)	-3%
OTHER														
Police/Court Fines/Adjudication	15,428	46,578	44,896	29,468	191%	(1,682)	-4%	181,938	266,894	232,125	50,187	28%	(34,769)	-15%
Investment Income	3,456	3,279	374	(3,082)	-89%	(2,905)	-89%	56,102	19,146	3,129	(52,973)	-94%	(16,017)	-512%
Miscellaneous Income	16,468	16,116	19,357	2,889	18%	3,241	20%	65,854	105,986	129,537	63,683	97%	23,551	18%
Transfers from Other Funds	180,619	287,300	147,594	(33,025)	-18%	(139,706)	-49%	728,455	905,433	776,493	48,038	7%	(128,940)	-17%
Subtotal Other	215,971	353,274	212,221	(3,750)	-2%	(141,053)	-40%	1,032,349	1,297,459	1,141,284	108,935	11%	(156,175)	-14%
Revenue Totals	3,010,960	3,116,191	3,368,909	357,949	12%	252,718	8%	9,444,833	9,660,232	10,596,429	1,151,596	12%	936,197	9%
EXPENDITURES														
Village Board & Clerk	3,488	8,495	30,561	27,073	776%	22,066	260%	50,100	61,680	75,945	25,845	52%	14,265	23%
Village Manager's Office	115,873	102,565	60,459	(55,414)	-48%	(42,106)	-41%	482,366	615,392	522,704	40,338	8%	(92,688)	-15%
Facilities Maintenance	63,015	66,964	60,145	(2,870)	-5%	(6,819)	-10%	403,648	401,785	371,990	(31,658)	-8%	(29,795)	-7%
Information Technology*	35,272	67,224	38,256	2,984	8%	(28,968)	-43%	375,500	403,342	332,535	(42,965)	-11%	(70,807)	-18%
Senior Services	10,332	7,397	7,770	(2,562)	-25%	373	5%	46,975	44,382	41,693	(5,282)	-11%	(2,689)	-6%
History Park	2,647	2,325	3,128	481	18%	803	35%	13,037	14,175	14,688	1,651	13%	513	4%
Law	21,176	25,674	26,269	5,093	24%	595	2%	176,012	154,042	187,207	11,195	6%	33,165	22%
Finance - Administration	39,632	47,020	50,932	11,300	29%	3,912	8%	318,394	282,205	280,478	(37,916)	-12%	(1,727)	-1%
Finance - Cashiers Office	20,927	26,401	17,579	(3,348)	-16%	(8,822)	-33%	155,883	158,409	165,403	9,520	6%	6,994	4%
Planning	43,504	45,935	35,677	(7,827)	-18%	(10,258)	-22%	288,649	275,608	245,497	(43,152)	-15%	(30,111)	-11%
Building	84,173	111,815	104,028	19,855	24%	(7,787)	-7%	639,584	670,892	577,060	(62,524)	-10%	(93,832)	-14%
Economic Development	15,075	13,805	19,892	4,817	32%	6,087	44%	186,222	335,082	294,767	108,545	58%	(40,315)	-12%
Police - Administration	195,801	167,526	176,206	(19,595)	-10%	8,680	5%	743,229	663,658	665,643	(77,586)	-10%	1,985	0%
Police - Operations	1,139,906	1,161,577	1,157,453	17,547	2%	(4,124)	0%	3,380,376	3,454,714	3,287,898	(92,478)	-3%	(166,816)	-5%
Police - Investigations	241,573	256,836	259,883	18,310	8%	3,047	1%	621,400	631,013	625,937	4,537	1%	(5,076)	-1%
Fire	34,765	24,030	23,640	(11,125)	-32%	(390)	-2%	157,874	171,990	172,676	14,802	9%	686	0%
EMS	63,819	35,767	39,717	(24,102)	-38%	3,950	11%	295,862	257,400	333,097	37,235	13%	75,697	29%
Public Works - Admin & Eng.**	75,865	68,956	50,813	(25,052)	-33%	(18,143)	-26%	416,173	413,733	364,726	(51,447)	-12%	(49,007)	-12%
Public Works - Streets	99,723	96,005	82,283	(17,440)	-17%	(13,722)	-14%	638,255	645,627	662,625	24,370	4%	16,998	3%
Public Works - Forestry	73,308	77,842	72,269	(1,039)	-1%	(5,573)	-7%	447,750	467,052	367,714	(80,036)	-18%	(99,338)	-21%
Expenditure Totals	2,379,874	2,414,158	2,316,960	(62,914)	-3%	(97,198)	-4%	9,837,289	10,122,181	9,590,283	(247,006)	-3%	(531,898)	-5%
Net Surplus / (Deficit)	631,086	702,033	1,051,949	420,863		349,916		(392,456)	(461,949)	1,006,146	1,398,602		1,468,095	

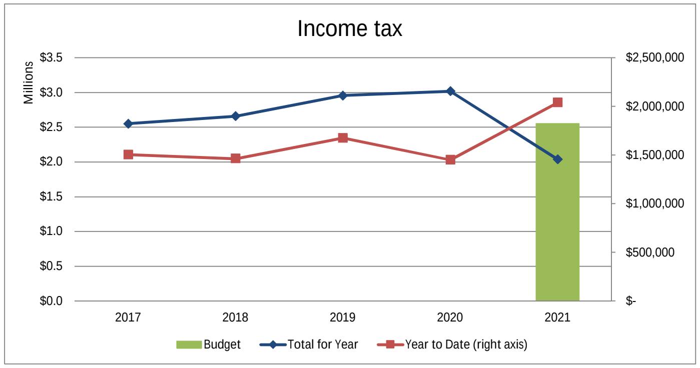
Key General Fund Revenues
For the Period Ended June 30, 2021

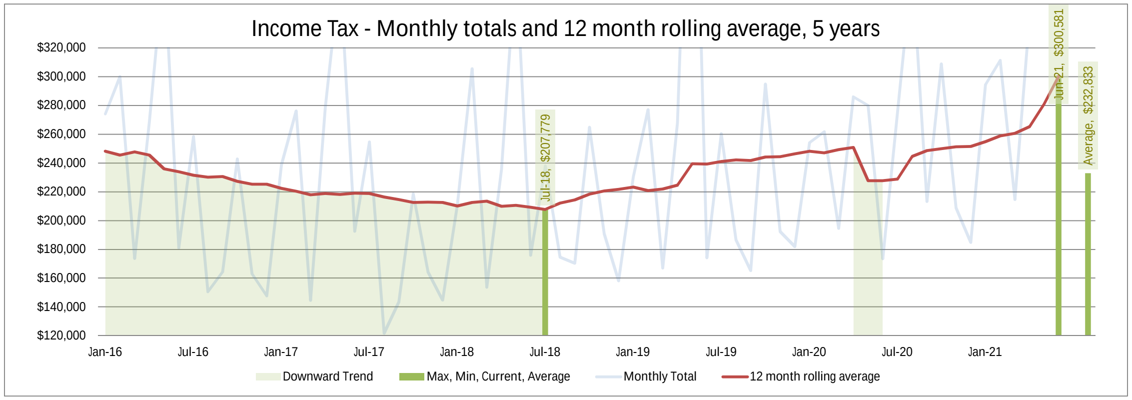












ATTACHMENT B – VILLAGE LINKS/RESERVE 22 MANAGERS REPORT AND FINANCIAL STATEMENTS - JUNE 30, 2020

VILLAGE LINKS GLEN ELLYN | RESERVE 22 TWENTY-TWO

“Committed to Excellence since 1967”

Manager’s Report for June 2021

Submitted by Jeff Vesevick, General Manager

June was very warm, almost 4°F above normal which is tied for the 4th warmest June on record. We are out of the drought due to the 4.75” of rain received. Carts were grounded for 4 days (87% availability). Golfers continued to support the game in high numbers, taking most of the available tee times. The patio was also a very popular spot in June, as the weather patterns graciously accommodated outdoor activity.

High Temperatures In June																	
	2021	2020	2019	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	2006	2005
90º days	2	3	1	5	2	2	1	1		9	4		4	1	7	1	8
80º days	17	15	9	9	13	15	9	19	12	12	11	17	9	16	9	14	13
70º days	11	10	13	11	14	11	15	7	13	7	12	12	10	13	13	12	8
60º days		2	7	5	1	2	4	3	5	2	3	1	7		1	3	1
50º days							1										
40º days																	
30º days																	
Rain	4.8"	4.2"	3.1"	5.8"	3.2"	2.3"	8.0"	6.1"	2.8"	0.9"	4.7"	8.9"	3.6"	5.0"	3.5"	5.4"	0.6"

GOLF

Monthly comparisons are to prior year, Y-T-D comparisons are to 2019 (pre-COVID)

Rounds played were down 7% for the month, and are up 43% over 2019.
Greens Fees were flat for the month, and are up 61% over 2019.
Motor Cart rentals were up 6% for the month, and are up 64% over 2019.
Driving Range was up 18% for the month, and is up 78% over 2019.
Golf Shop merchandise sales were flat for the month, and are up 30% over 2019.
Overall Golf Revenue was up 1% for the month, and is up 55% over 2019.

Golf Revenue June											
	2011	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021
Rounds	11,515	13,144	10,189	11,305	10,936	12,307	11,815	10,459	11,782	13,350	12,452
Green Fees	276,636	318,841	252,324	291,012	277,526	310,002	307,505	279,480	325,972	367,622	367,567
Driving Range	34,379	41,465	0	37,032	40,604	45,584	42,677	44,326	48,808	55,264	65,367
Pro Shop	26,957	34,951	19,781	29,276	30,844	24,136	27,044	27,515	27,155	28,008	28,067
Carts	60,733	52,360	61,134	71,960	69,432	82,332	93,613	79,271	89,938	89,704	95,299
Resident Cards	3,639	3,490	2,820	4,380	3,770	3,910	3,930	3,060	3,860	6,080	2,620
Miscellaneous	14,017	14,003	9,187	18,008	8,700	17,468	10,104	13,122	13,435	18,768	12,324
Total Revenue	**416,453**	**494,969**	**345,350**	**433,534**	**430,876**	**483,432**	**484,872**	**446,774**	**509,168**	**565,446**	**571,245**
Total Golf Revenues in June were the best in the past 11 years											

Golf Outings scheduled in June 2020 were cancelled, due to the State of Illinois restrictions placed on golf courses. As restrictions eased, groups slowly began to book events, as we hosted 560 rounds, about 70% of June 2019. Generally accounting for up to 15% of the month's golf revenues, fewer inquiries were easily covered by open play.

The **Have One On Us** customer appreciation golf and food event was held in a modified format, using electronic scoring for the first time, and without the normal fanfare of side events, food tent, or party atmosphere. Still, golfers were treated to free range balls, complimentary food and beverage, and the chance to win over $50,000 in prize giveaways.

GOLF COURSE and GROUNDS

Grounds

1. Plant protectant apps continued
2. All rough sprayed for weeds and preemergent for crabgrass
3. Flowers planted at entrance signs, and Lambert sign
4. Added 5 summer seasonal staff
5. All greenside bunkers edged and weeds removed
6. De littered parkways multiple times

Mechanical and Building Maintenance

1. 15 pieces of equipment were repaired and/or serviced.
2. Grinding of reels and mower blades as needed
3. Installed air conditioning in both starter huts
4. All HVAC units on property inspected
5. Washed Hood Fan Filters to prevent smoke buildup in kitchen

Horticulture/Conservation

1. Continued spraying mulch beds for weeds
2. Tropical Plants and Hanging Baskets fertilized
3. Solicited quotes for Contractor to edge and weed beds
4. Solicited quotes for path restoration work at Panfish

RESERVE 22

Restaurant and Bar sales were up 6% for the month, and are up 53% for the year.
Banquet sales were $85k, versus $0 a year ago, and $105k in 2019.
Overall sales were up 38% for the month, and are up 57% for the year.

Reserve 22 - JUNE				Year to Date		
	2020	2021	+/-	2020	2021	+/-
Restaurant & Bar	254,593	270,831	6.4%	488,376	748,877	53.3%
Banquets	0	85,207	#DIV/0!	108,803	175,326	61.1%
from Outings	0	8,386	#DIV/0!	0	8,386	#DIV/0!
Beverage Cart	14,736	14,328	-2.8%	16,863	26,751	58.6%
Halfway House	23,404	20,352	-13.0%	30,391	59,199	94.8%
Other	6,875	23,807	246.3%	25,260	37,860	49.9%
Total Reserve 22	**299,608**	**414,525**	**38.4%**	669,693	**1,048,013**	**56.5%**

2019's pre COVID revenues

Reserve 22 - JUNE				Year to Date		
	2019	2020	+/-	2019	2020	+/-
Restaurant & Bar	224,780	254,593	13.3%	730,019	488,375	-33.1%
Banquets	105,199	0	-100.0%	315,227	109,839	-65.2%
from Outings	42,401	0	-100.0%	66,542	0	-100.0%
Beverage Cart	15,206	15,011	-1.3%	24,805	17,159	-30.8%
Halfway House	19,089	23,129	21.2%	36,626	30,111	-17.8%
Other	6,057	6,875	13.5%	6,470	8,085	25.0%
Total Reserve 22	370,331	299,608	-19.1%	1,113,147	653,569	-41.3%

The great weather had diners eager to eat outdoors, as the public remained cautious. However, with most restrictions lifted, volume increases were dramatic in the Restaurant and Bar.
The Banquet business was much slower to recover, as restrictions remained in place longer, and booked events had already downsized. There were many smaller sized events.
Many new faces were hired and trained, and many familiar ones returned. However, Brad Chapple and his management team had a very difficult time finding workers to fill vacancies, most notably in the kitchen staff.

VILLAGE LINKS / RESERVE 22
STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
As of June 30, 2021

ORG	DESCRIPTION	2021 BUDGET	MONTH 2021	MONTH 2020	MONTH DIFF	MONTH % DIFF	YEAR-TO-DATE 2021	YEAR-TO-DATE 2020	YEAR-TO-DATE DIFF	YEAR-TO-DATE % DIFF
	REVENUES:									
5500	Village Links Revenues	$ 3,113,850	$ 573,964	$ 565,527	$ 8,437	1%	$ 1,622,570	$ 881,394	$ 741,176	84%
5520	Reserve 22 Revenues	2,731,000	414,525	299,607	114,918	38%	1,058,641	669,692	388,950	58%
	Total Revenues	**$ 5,844,850**	**$ 988,490**	**$ 865,134**	**$ 123,355**	**14%**	**$ 2,681,211**	**$ 1,551,085**	**$ 1,130,126**	**73%**
	EXPENDITURES:									
55700	Administration	$ 460,117	$ 36,321	$ 34,575	$ 1,746	5%	$ 222,422	$ 220,573	$ 1,849	1%
55710	Golf Course Maintenance	899,270	66,298	86,511	(20,213)	-23%	375,684	338,449	37,235	11%
55720	Golf Services	722,908	79,001	49,624	29,376	59%	291,956	229,774	62,182	27%
55730	Reserve 22	2,420,256	316,460	74,836	241,624	323%	830,271	604,076	226,195	37%
55740	Stormwater Management	28,814	1,981	267	1,714	642%	3,633	2,171	1,462	67%
55750	Pro Shop Merchandise	158,495	26,877	20,904	5,973	29%	70,369	36,822	33,547	91%
55780	Motorized Carts	45,515	6,812	2,839	3,973	140%	14,823	3,146	11,678	371%
557X5	Mechanical Maintenance	196,841	10,456	6,753	3,704	55%	87,178	69,742	17,436	25%
	Total Operating Expenses	$ 4,932,216	$ 544,205	$ 276,308	$ 267,897	97%	$ 1,896,336	$ 1,504,753	$ 391,583	26%
	Operating Income	**$ 912,634**	**$ 444,285**	**$ 588,826**	**$ (144,542)**	**-25%**	**$ 784,875**	**$ 46,332**	**$ 738,543**	**1594%**
	Debt Service	656,084	43,041	51,348	(8,306)	-16%	43,041	51,348	(8,306)	-16%
	Capital Expenditures	222,000	10,554	-	10,554	0%	45,494	20,525	24,969	122%
	CHANGE IN NET POSITION	**$ 34,550**	**$ 390,689**	**$ 537,479**	**$ (146,790)**	**-27%**	**$ 696,340**	**$ (25,540)**	**$ 721,880**	**-2826%**
	KEY METRICS	*Goal*								
	Personnel Expenses as % of Sales	*47%*	*27%*	*22%*	*6%*		*37%*	*64%*	*-27%*	
	Cash Balance (End of Month, in $000's)	*$ 1,234*	*$ 1,610*	*$ 655*	*$ 955*					

VILLAGE LINKS GLEN ELLYN | RESERVE 22 TWENTY-TWO

VILLAGE LINKS
STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
GOLF
(Including Administration, Grounds, & Mechanical Maintenance)
As of June 30, 2021

ORG/ OBJECT	DESCRIPTION	2021 BUDGET	MONTH 2021	MONTH 2020	MONTH DIFF	MONTH % DIFF	YEAR-TO-DATE 2021	YEAR-TO-DATE 2020	YEAR-TO-DATE DIFF	YEAR-TO-DATE % DIFF
5500	**VILLAGE LINKS REVENUES:**									
440550	Green Fees	$ 1,950,000	$ 367,567	$ 367,622	$ (54)	0%	$ 987,400	$ 585,184	$ 402,216	69%
440554	Pro Shop - Sales	170,000	28,067	28,008	60	0%	81,238	41,648	39,590	95%
440555	Motor Carts	500,000	95,299	89,704	5,595	6%	243,190	105,548	137,642	130%
440556	Driving Range	300,000	65,367	55,264	10,103	18%	203,760	68,931	134,829	196%
440557	Resident Cards	32,000	2,620	6,080	(3,460)	-57%	32,856	27,060	5,796	21%
460100	Investment Income	8,500	0	3	(3)	-93%	2	2,340	(2,338)	-100%
489000	Miscellaneous Revenue	126,550	12,820	18,761	(5,941)	-32%	60,984	50,901	10,083	20%
489100	Miscellaneous - Over/Short	-	(10)	86	(96)	-112%	(260)	(218)	(43)	20%
490800	Operating Transfer In	26,800	2,233	-	2,233	0%	13,400	-	13,400	0%
	Total Revenues	**$ 3,113,850**	**$ 573,964**	**$ 565,527**	**$ 8,437**	**1%**	**$ 1,622,570**	**$ 881,394**	**$ 741,176**	**84%**
	COST OF GOODS SOLD:									
520945	Cost of Goods Sold - Pro Shop	$ 127,500	$ 24,096	$ 18,671	$ 5,425	29%	$ 55,682	$ 22,716	$ 32,965	145%
	Total Cost of Goods Sold	**$ 127,500**	**$ 24,096**	**$ 18,671**	**$ 5,425**	**29%**	**$ 55,682**	**$ 22,716**	**$ 32,965**	**145%**
	Gross Profit	**$ 2,986,350**	**$ 549,868**	**$ 546,856**	**$ 3,012**	**1%**	**$ 1,566,888**	**$ 858,677**	**$ 708,211**	**82%**
	OTHER OPERATING EXPENSES:									
510100	Salaries - Pensionable	$ 943,660	$ 72,748	$ 71,519	$ 1,228	2%	$ 364,288	$ 332,744	$ 31,544	9%
510120	Salaries - Non-Pensionable	194,800	33,180	19,110	14,070	74%	76,174	111,310	(35,136)	-32%
510200	Salaries - Overtime	6,740	477	587	(111)	-19%	1,028	923	105	11%
510400	FICA Taxes	86,408	7,910	6,751	1,159	17%	32,576	32,705	(129)	0%
510500	IMRF	82,774	6,251	6,258	(7)	0%	30,728	35,858	(5,129)	-14%
590600	Health Insurance	137,400	10,281	10,121	160	2%	58,602	65,633	(7,030)	-11%
52XXXX	Contractual Services	624,178	46,132	32,303	13,829	43%	267,185	213,833	53,351	25%
53XXXX	Commodities	308,500	26,671	36,152	(9,481)	-26%	179,803	84,955	94,848	112%
	Total Operating Expenses	**$ 2,384,460**	**$ 203,649**	**$ 182,801**	**$ 20,848**	**11%**	**$ 1,010,383**	**$ 877,961**	**$ 132,423**	**15%**
	Operating Income (Loss)	**$ 601,890**	**$ 346,220**	**$ 364,055**	**$ (17,835)**	**-5%**	**$ 556,505**	**$ (19,284)**	**$ 575,788**	**-2986%**
	Operating Income (Loss) Percentage	**19%**	**60%**	**64%**			**34%**	**-2%**		

KEY METRICS

	Goal	*MONTH 2021*	*MONTH 2020*	*MONTH DIFF*	*YTD 2021*	*YTD 2020*	*YTD DIFF*
Rounds Played	*70,000*	*12,452*	*13,530*	*(1,078)*	*33,186*	*20,608*	*12,578*
Revenue Per Round	*$ 44.48*	*$ 46.09*	*$ 41.80*	*$ 4.30*	*$ 48.89*	*$ 42.77*	*$ 6.12*
Resident Cards Sold	*N/A*	*147*	*342*	*(195)*	*2,693*	*2,272*	*421*
Cost of Goods Sold % - Pro Shop	*75%*	*86%*	*67%*	*19%*	*69%*	*55%*	*14%*
Personnel Expenses as % of Sales	*47%*	*23%*	*20%*	*3%*	*35%*	*66%*	*-31%*

VILLAGE LINKS
GLEN ELLYN

RESERVE 22 TWENTY-TWO

VILLAGE LINKS
STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
GOLF
(Including Administration, Grounds, & Mechanical Maintenance)
As of June 30, 2021

ORG/ OBJECT	DESCRIPTION	2021 BUDGET	MONTH 2021	MONTH 2020	MONTH DIFF	MONTH % DIFF	YEAR-TO-DATE 2021	YEAR-TO-DATE 2020	YEAR-TO-DATE DIFF	YEAR-TO-DATE % DIFF
	MISCELLANEOUS REVENUE									
	Miscellaneous Revenue includes the following items, which don't fit into any of the major revenue categories:									
	Adult & Junior Golf Lessons		*$ 7,359*	*$ 12,412*	*$ (5,053)*		*$ 40,359*	*$ 25,662*	*$ 14,697*	
	Handicaps		*-*	*1,800*	*(1,800)*		*-*	*15,360*	*(15,360)*	
	Hand Cart Rentals		*4,311*	*4,519*	*(208)*		*11,451*	*6,144*	*5,307*	
	Golf Club Rentals		*720*	*-*	*720*		*1,330*	*30*	*1,300*	
	Golf Club Repairs		*-*	*24*	*(24)*		*738*	*194*	*544*	
	Locker Rentals		*-*	*-*	*-*		*2,720*	*2,880*	*(160)*	
	Illinois Sales Tax (1.75%)		*451*	*(5)*	*456*		*959*	*605*	*354*	
	Glen Ellyn Food & Beverage Tax (1%)		*45*	*(2)*	*47*		*92*	*16*	*76*	
	Misc. Outings		*-*	*-*	*-*		*1,048*	*-*	*1,048*	
	FootGolf Ball Rentals		*10*	*10*	*-*		*15*	*25*	*(10)*	
	ATM Machine Commission		*-*	*3*	*(3)*		*11*	*23*	*(12)*	
	Miscellaneous		*(76)*	*-*	*(76)*		*2,262*	*(38)*	*2,300*	
	Total	*$ 126,550*	*$ 12,820*	*$ 18,761*	*$ (5,941)*		*$ 60,984*	*$ 50,901*	*$ 10,083*	

VILLAGE LINKS GLEN ELLYN | RESERVE 22 TWENTY-TWO

RESERVE 22
STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
As of June 30, 2021

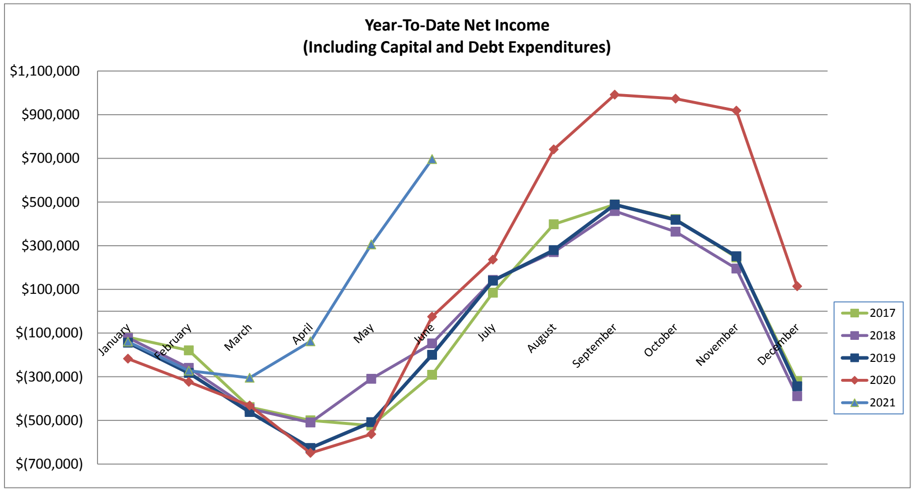
ORG/		2021	MONTH				YEAR-TO-DATE			
OBJECT	DESCRIPTION	BUDGET	2021	2020	DIFF	% DIFF	2021	2020	DIFF	% DIFF
5520	**RESERVE 22 REVENUES:**									
441100	Food	$ 1,500,000	$ 224,141	$ 156,055	$ 68,086	44%	$ 588,360	$ 385,044	$ 203,316	53%
441101	Liquor	260,000	46,125	30,153	15,971	53%	112,712	63,661	49,051	77%
441102	Beer	485,000	74,498	71,224	3,274	5%	198,006	110,848	87,158	79%
441103	Wine	235,000	33,276	26,289	6,987	27%	86,609	62,247	24,362	39%
441104	NA Beverages	85,000	15,633	15,843	(210)	-1%	33,980	22,628	11,352	50%
441106	Room Charges	4,000	2,441	-	2,441	0%	2,871	1,950	921	47%
441107	Service Charges	160,000	15,941	-	15,941	0%	32,625	21,663	10,962	51%
489000	Miscellaneous Revenue	2,000	2,470	43	2,427	5632%	3,478	1,651	1,827	111%
	Total Revenues	**$ 2,731,000**	**$ 414,525**	**$ 299,607**	**$ 114,918**	**38%**	**$ 1,058,641**	**$ 669,692**	**$ 388,950**	**58%**
55730	**COST OF GOODS SOLD:**									
530400	Cost of Goods Sold - Beer	$ 135,800	$ 15,924	$ 4,264	$ 11,660	273%	$ 49,900	$ 15,985	$ 33,915	212%
530401	Cost of Goods Sold - Wine	72,850	5,060	(845)	5,904	-699%	22,574	11,097	11,478	103%
530402	Cost of Goods Sold - Liquor	52,000	9,323	(3,540)	12,863	-363%	22,081	3,229	18,852	584%
530405	Cost of Goods Sold - NA Beverages	35,700	11,408	1,033	10,375	1005%	20,945	4,492	16,454	366%
530420	Cost of Goods Sold - Food	480,000	106,518	(116)	106,634	-91823%	205,424	75,837	129,588	171%
	Total Cost of Goods Sold	**$ 776,350**	**$ 148,233**	**$ 796**	**$ 147,438**	**18531%**	**$ 320,925**	**$ 110,639**	**$ 210,286**	**190%**
	Gross Profit	**$ 1,954,650**	**$ 266,292**	**$ 298,812**	**$ (32,520)**	**-11%**	**$ 737,716**	**$ 559,052**	**$ 178,664**	**32%**
	Gross Profit Percentage	**72%**	**64%**	**100%**			**70%**	**83%**		
55730	**OTHER OPERATING EXPENSES:**									
510100	Salaries - Pensionable	$ 607,800	$ 48,704	$ 35,564	$ 13,140	37%	$ 200,544	$ 240,369	$ (39,825)	-17%
510120	Salaries - Non-Pensionable	460,000	62,367	19,630	42,737	218%	127,815	79,917	47,898	60%
510200	Salaries - Overtime	5,000	4,770	2,107	2,663	126%	6,267	2,507	3,760	150%
510399	Tips Paid Through Payroll	-	(2,411)	(10,157)	7,745	-76%	(15,270)	(7,581)	(7,689)	101%
510400	FICA Taxes	115,440	12,268	6,018	6,250	104%	33,207	29,208	3,999	14%
510500	IMRF	53,520	5,697	3,872	1,825	47%	21,210	24,124	(2,914)	-12%
590600	Health Insurance	73,900	5,574	4,877	696	14%	33,441	31,703	1,738	5%
52XXXX	Contractual Services	179,246	13,059	6,597	6,462	98%	48,604	54,823	(6,219)	-11%
53XXXX	Commodities	149,000	18,199	5,531	12,668	229%	53,527	38,366	15,161	40%
	Total Operating Expenses	**$ 1,643,906**	**$ 168,227**	**$ 74,041**	**$ 94,187**	**127%**	**$ 509,346**	**$ 493,436**	**$ 15,909**	**3%**
	Operating Income	**$ 310,744**	**$ 98,065**	**$ 224,771**	**$ (126,706)**	**-56%**	**$ 228,371**	**$ 65,616**	**$ 162,754**	**248%**
	Operating Income Percentage	**11%**	**24%**	**75%**			**22%**	**10%**		

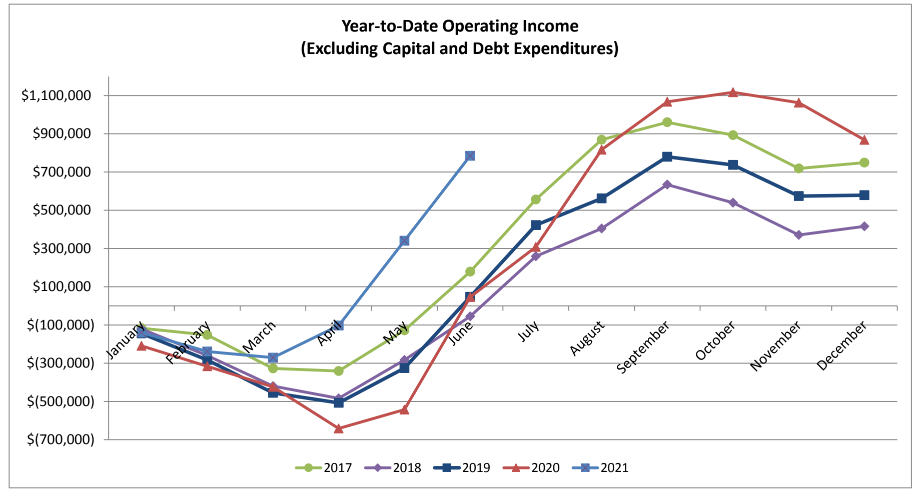
VILLAGE LINKS GLEN ELLYN | RESERVE 22 TWENTY-TWO

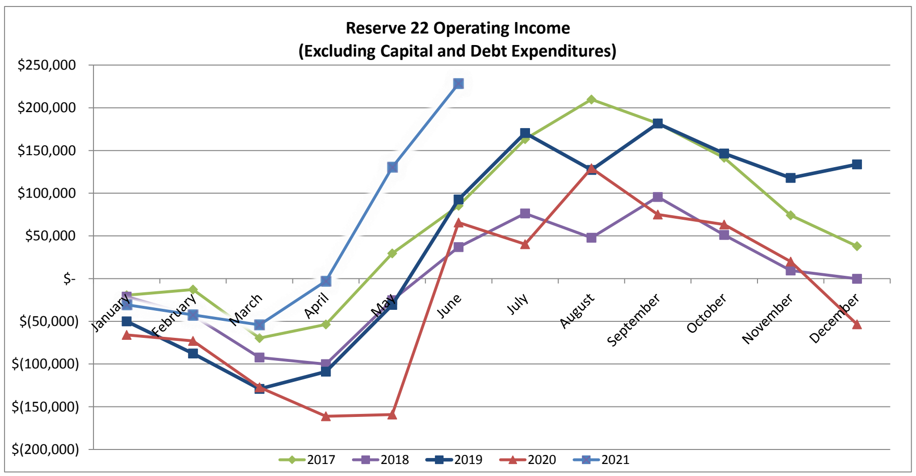
RESERVE 22
STATEMENT OF REVENUES, EXPENSES, AND CHANGES IN NET POSITION
As of June 30, 2021

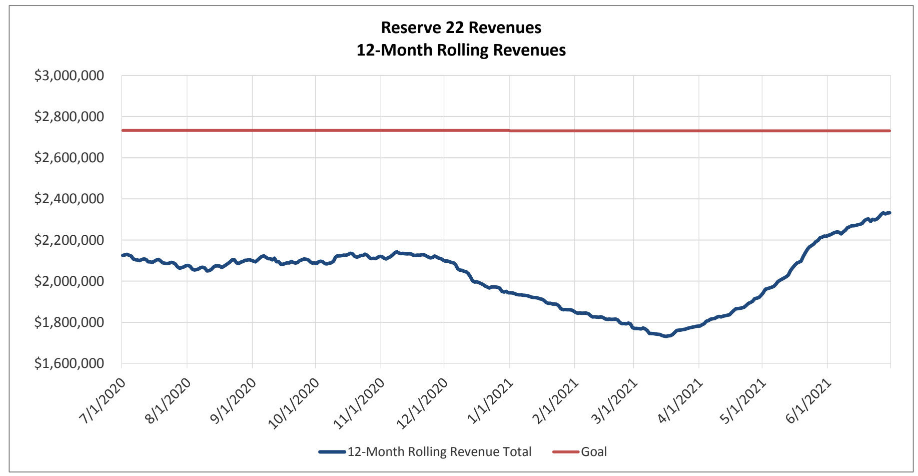
ORG/ OBJECT	DESCRIPTION	2021 BUDGET	MONTH 2021	MONTH 2020	MONTH DIFF	MONTH % DIFF	YEAR-TO-DATE 2021	YEAR-TO-DATE 2020	YEAR-TO-DATE DIFF	YEAR-TO-DATE % DIFF
	KEY METRICS									
		Goal								
	Revenue Source:									
	Restaurant/Bar	*N/A*	*$ 270,831*	*$ 254,592*	*$ 16,239*	*6%*	*$ 748,770*	*$ 487,998*	*$ 260,772*	*53%*
	Banquets	*N/A*	*98,757*	*-*	*98,757*	*0%*	*202,845*	*125,958*	*76,888*	*61%*
	Other	*N/A*	*44,937*	*45,015*	*(78)*	*0%*	*107,026*	*55,736*	*51,290*	*92%*
	Total	*$ 2,731,000*	*$ 414,525*	*$ 299,607*	*$ 114,918*	*38%*	*$ 1,058,641*	*$ 669,692*	*$ 388,950*	*58%*
	Reserve 22 Revenues (Last 12 Months)	*$ 2,731,000*					$ 2,332,638	$ 2,121,572	*$ 211,065*	*10%*
	Reserve 22 Expenses (Last 12 Months)	*$ 2,420,256*					$ 2,223,382	$ 2,014,891	*$ 208,492*	*10%*
	# Guest Checks (Restaurant/Bar)	*N/A*	*7,039*	*5,651*	*1,388*		*18,810*	*11,896*	*6,914*	
	Revenue Per Guest Check	*N/A*	*$ 38.48*	*$ 45.05*	*$ (6.58)*		*$ 39.81*	*$ 41.02*	*$ (1.22)*	
	# Guests (Restaurant/Bar)	*N/A*	*12,409*	*10,441*	*1,968*		*32,029*	*20,240*	*11,789*	
	Average Guest Spend	*N/A*	*$ 21.83*	*$ 24.38*	*$ (2.56)*		*$ 23.38*	*$ 24.11*	*$ (0.73)*	
	Cost of Goods Sold %	*28%*	*36%*	*0%*	*35%*		*30%*	*17%*	*14%*	
	Cost of Goods Sold % (By Category):									
	Cost of Goods Sold - Beer	*28%*	*21%*	*6%*	*15%*		*25%*	*14%*	*11%*	
	Cost of Goods Sold - Wine	*31%*	*15%*	*-3%*	*18%*		*26%*	*18%*	*8%*	
	Cost of Goods Sold - Liquor	*20%*	*20%*	*-12%*	*32%*		*20%*	*5%*	*15%*	
	Cost of Goods Sold - NA Beverages	*42%*	*73%*	*7%*	*66%*		*62%*	*20%*	*42%*	
	Cost of Goods Sold - Food	*32%*	*48%*	*0%*	*48%*		*35%*	*20%*	*15%*	
	Personnel Expenses as % of Sales	*48%*	*32%*	*24%*	*8%*		*39%*	*61%*	*-22%*	
	Prime Cost (Cost of Goods Sold + Personnel Expenses) as % of Sales	*77%*	*69%*	*24%*	*45%*		*70%*	*77%*	*-7%*	

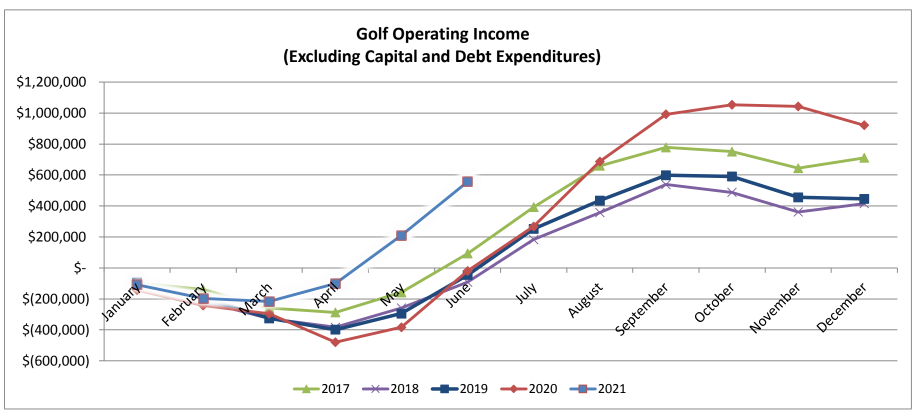
Village Links / Reserve 22
Dashboard Financial Report
As of June 30, 2021

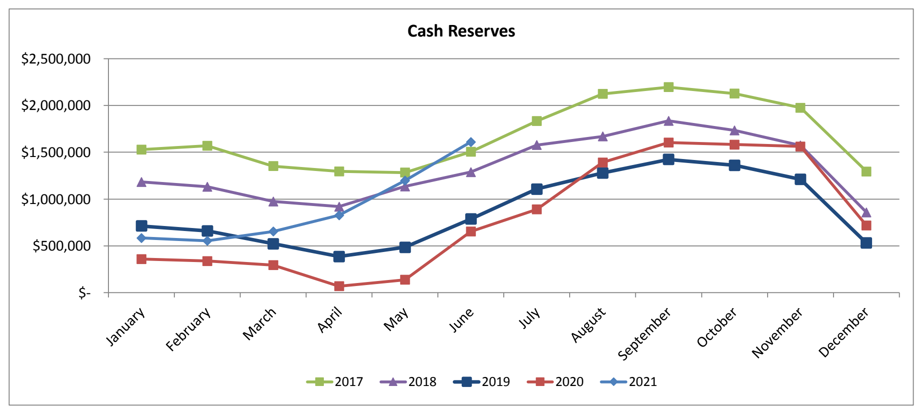












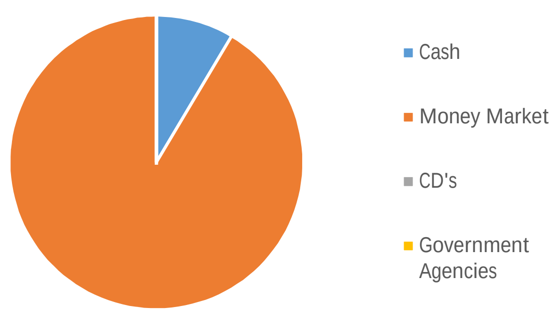
ATTACHMENT C – CASH AND INVESTMENTS REPORT - JUNE 30, 2020

535 DUANE STREET • GLEN ELLYN, IL 60137 630.469.5000 • WWW. GLENELLYN.ORG

Village of Glen Ellyn
Schedule of Cash and Investment Balances
For the Month Ended June 30, 2021

Summary of Investments by Type	Par Value	Market Value	Maturity < 1 year	1-3 years
Cash/Checking	$ 6,617,647	$ 6,617,647	$ 6,617,647	$ -
Cash/Checking - Federal Drug	8,979	8,979	8,979	-
Cash/Checking - State Drug	-	-	-	-
Cash/Checking - FLEX	24,708	24,708	24,708	-
Cash/Checking - Seized Property	36,271	36,271	36,271	-
Money Market - IL Funds	25,152,090	25,152,090	25,152,090	-
Money Market - IL Funds State Drug	19,413	19,413	19,413	-
Money Market - IL Funds Fed Drug	46,447	46,447	46,447	-
Money Market - IL Funds MFT	2,744,937	2,744,937	2,744,937	-
Money Market - IMET Convenience Fund	3,757	3,757	3,757	-
PFM Illinois Trust	15,248,664	15,248,664	15,248,664	-
PMA 2020 Bond Account - Money Market	2,580,571	2,580,571	2,580,571	
PMA Portfolio - Money Market	25,800,879	25,800,879	25,800,879	-
PMA Portfolio - CD's	-	-	-	-
	$ 78,284,363	$ 78,284,363	$ 78,284,363	$ -
			100%	0%

Investments by Type



Portfolio Concentration	Percent of Portfolio	Policy Limit
Cash/Checking Total (Glen Ellyn Bank & Trust)	8.54%	25%
IL Funds Total	35.72%	75%
IMET Total	0.00%	25%
PFM Total	19.48%	25%
PMA Total	36.25%	N/A

Investment Income	FY2020	FY2021
Investment Income	$ 472,504	$ 17,802

Investment Performance	FY2020	FY2021
Average Yield YTD - IL Funds	1.462%	0.074%
Average Yield YTD - IMET Convenience Fund	1.207%	0.250%
Average Yield YTD - PFM	1.580%	0.053%
Average Yield YTD - PMA	2.311%	0.057%
Benchmark - Three Month T-Bill	0.110%	0.030%

Village of Glen Ellyn
Analysis of Available Cash Reserves
For the Month Ended June 30, 2021

	Fund	A	B	C	D	E	F	G	I	J	L	M	N	
		Last Year Cash & Investment Balances	Current Year Cash & Investment Balances	Less Encumbrances	Transfer between Funds	Less Deposits/ Other	Restricted by Statute	Assigned for Capital Projects	Assigned for Liab/Health Ins.	Assigned for Hotel	Balance Subject to Reserve Policy	Less Minimum Reserve Policy	Cash Above Minimum Policy	
1	General	$ 10,655,599	$ 14,700,616	$ (249,293)	$ -	$ (2,755,035)	$ -	$ -	$ -	$ (2,000,000)	$ 9,696,288	$ (6,174,000)	$ 3,522,288	1
2	Corporate Reserve	22,021	595,216	(7,108)	-	-	-	-	-	(500,000)	88,108	-	88,108	
3	Motor Fuel Tax	1,500,237	2,744,937	(373,875)	-	-	(2,371,062)	-	-	-	-	-	-	
4	Fire Services	3,527,773	4,423,268	-	-	-	-	(4,423,268)	-	-	-	-	-	
5	CBD TIF	674,002	973,625	(221,477)	-	-	(752,148)	-	-	-	-	-	-	
6	Roosevelt Road TIF	184,611	315,136	(370)	-	-	35,234	-	-	(350,000)	-	-	-	
7	Forfeiture Fund	300,855	111,110	(72,827)	-	-	(38,283)	-	-	-	-	-	-	
8	Debt Service	77,758	39,947	-	-	-	(39,947)	-	-	-	-	-	-	
9	Capital Projects	22,494,749	22,233,807	(5,850,057)	(1,022,611)	-	-	(15,361,139)	-	-	-	-	-	
10	Facilities Maint Reserve	597,908	898,769	(475,267)	-	-	-	(423,502)	-	-	-	-	-	
11	Water and Sanitary Sewer	18,333,086	20,720,139	(2,511,772)	-	(201,372)	-	(14,303,134)	-	-	3,703,861	(2,408,000)	1,295,861	2
12	Parking	1,616,678	1,669,221	(1,997,896)	1,022,611		-	-	-	-	693,936	(79,600)	614,336	2
13	Residential Solid Waste	691,492	585,652	(107,500)	-	-	-	-	-	-	478,152	(428,325)	49,827	2
14	Village Links/Reserve 22	654,537	1,609,843	(138,636)	-	(38,610)	-	-	-	-	1,432,597	(1,234,000)	198,597	3
15	Insurance	1,366,911	1,177,478	-	-	-	-	-	(1,177,478)	-	-	-	-	
16	Equipment Services	5,397,568	5,485,599	(868,093)	-	-	-	(5,310,407)	-	-	(692,901)	-	(692,901)	
		$ 68,095,785	$ 78,284,363	$ (12,874,171)	$ -	$ (2,995,017)	$ (3,166,206)	$ (39,821,450)	$ (1,177,478)	$ (2,850,000)	$ 15,400,041	$ (10,323,925)	$ 5,076,116	
17	Police Pension	$ 31,483,298	$ 38,062,530	$ (375)	$ -	$ -	$ (38,062,155)	$ -	$ -	$ -	$ -	$ -	$ -	

Footnotes:

(a) Encumbrances represent the unexpended portion of approved contracts for goods and services as of the end of the quarter. While encumbrances are not expenditures, they do represent a reduction in the level of available spendable cash.

(b) Transfer between funds represents Capital Projects Fund and bond proceeds to be transferred to the Parking Fund for the parking garage project.

(c) Deposits/Other represents money that the Village is holding but either is due to others such as deposits or other payables.

(d) Amounts restricted by statute are required by state or federal law to only be spent on specific expenditures.

(e) Amounts that are assigned have been designated by the Village's ordinances or budget to be spent on specific purposes. Amounts per fund are as follows:
- General Fund/Corp Reserve/Roos TIF: The Village is committed to purchase a hotel property at $2.85M
- Fire Services: Designated by Village code for fire operations, equipment and facilities.
- Capital Projects: Designated by the 5 year Capital Improvement Plan
- Facilities Maintenance Reserve: Designated by the 5 year Plan to be used for Village facilities.
- Water & Sewer: Designated by the 5 year Capital Improvement Plan
- Equipment Services: Designated by the Equipment Replacement Plan

(f) The Village has reserve policies as follows:
- General Fund: Amount subject to reserve is 30% of operating expenditures.
- Water and Sanitary Sewer Fund: Amount subject to reserve is $2,408,000, which will be adjusted annually by CPI-U or 3%, whichever is less.
- Parking Fund: Amount subject to reserve is 25% of operating expenses.
- Residential Solid Waste Fund: Amount subject to reserve is 25% of operating expenses
- Village Links/Reserve 22 Fund: Amount subject to reserve is 25% of operating expenses.

(g) The cash above minimum policy is the amount undesignated above the minimum required level. In some cases, these funds may be restricted to the purpose for which the fund exists.

Notes on cash above/below reserve policy:

1 The Village hits a cash peak in June through September and a low point in April/May.

2 These are enterprise funds and are meant to be treated as separate enterprises/businesses. Generally, these funds cannot be repurposed to other funds.

VILLAGE OF Glen Ellyn ILLINOIS

ATTACHMENT D – ALL FUNDS SUMMARY - JUNE 30, 2020

535 DUANE STREET • GLEN ELLYN, IL 60137 • 630.469.5000 • WWW. GLENELLYN.ORG

VILLAGE OF GLEN ELLYN
ALL FUNDS SUMMARY
FOR THE QUARTER ENDED JUNE 30, 2021

Fund	Current Year Activity: Revised Budget Revenues	Revised Budget (Expenses)	Net Income (Loss)	Year to date Revenues	Year to date Expenditures (Expenses)	Year to date Net Income (Loss)	Year to date Encumbrances	Year to date Net Income Less Encumbrances	Prior Year Activity: Year to date Revenues	Year to date Expenditures (Expenses)	Year to date Net Income (Loss)	Year to date Encumbrances	Year to date Net Income Less Encumbrances
Governmental Funds													
General	$ 18,891,819	$ 20,882,103	$ (1,990,284)	$ 10,596,423	$ 9,590,278	$ 1,006,145	$ 249,293	$ 756,852	$ 9,444,823	$ 9,837,289	$ (392,466)	$ 397,136	$ (789,602)
Debt Service	2,245,286	2,246,436	(1,150)	494,502	495,043	(541)	-	(541)	399,093	362,465	36,628	-	36,628
Capital Projects	9,536,128	17,242,373	(7,706,245)	4,202,337	9,483,941	(5,281,604)	5,850,057	(11,131,661)	4,074,879	2,180,555	1,894,323	4,701,459	(2,807,136)
Corporate Reserve	600	68,998	(68,398)	5	2,500	(2,495)	7,108	(9,603)	190	8,254	(8,065)	-	(8,065)
Motor Fuel Tax	1,708,400	1,470,016	238,384	1,127,720	368,750	758,970	373,875	385,095	844,384	362,474	481,909	445,485	36,424
Central Business District (CBD) TIF	463,200	403,990	59,210	263,377	154,760	108,617	221,477	(112,860)	227,705	53,538	174,167	26,180	147,987
Roosevelt Road TIF	145,100	25,370	119,730	76,277	10,973	65,304	370	64,934	74,726	12,000	62,726	370	62,356
Fire Services	1,851,762	1,112,716	739,046	925,175	422,925	502,250	-	502,250	925,334	672,136	253,198	-	253,198
Forfeiture Fund	4,000	168,475	(164,475)	9,427	116,182	(106,755)	72,827	(179,582)	68,938	91,992	(23,054)	-	(23,054)
Facilities Maint Reserve	378,750	1,020,000	(641,250)	187,626	32,062	155,564	475,267	(319,703)	193,169	115,225	77,944	62,700	15,245
TOTAL GOVERNMENTAL FUNDS	$ 35,225,045	$ 44,640,477	$ (9,415,432)	$ 17,882,869	$ 20,677,414	$ (2,794,545)	$ 7,250,274	$ (10,044,819)	$ 16,253,239	$ 13,695,929	$ 2,557,311	$ 5,633,330	$ (3,076,020)
Enterprise Funds													
Water and Sanitary Sewer	$ 13,694,575	$ 18,277,845	$ (4,583,270)	$ 6,483,276	$ 5,436,277	$ 1,046,999	$ 2,511,772	$ (1,464,773)	$ 6,500,318	$ 5,687,298	$ 813,020	$ 1,868,771	$ (1,055,752)
Village Links/Reserve 22	5,844,850	5,810,300	34,550	2,681,211	1,984,871	696,340	138,636	557,704	1,551,085	1,576,625	$ (25,540)	2,502	(28,042)
Parking	4,850,323	9,577,117	(4,726,794)	8,001,672	8,054,312	(52,640)	1,997,896	(2,050,536)	1,049,367	1,140,552	$ (91,185)	14,554,921	(14,646,106)
Residential Solid Waste	1,752,800	1,713,300	39,500	871,511	818,800	52,711	107,500	(54,789)	843,292	777,453	65,839	150,500	(84,661)
TOTAL ENTERPRISE FUNDS	$ 26,142,548	$ 35,378,562	$ (9,236,014)	$ 18,037,670	$ 16,294,260	$ 1,743,410	$ 4,755,804	$ (3,012,394)	$ 9,944,062	$ 9,181,928	$ 762,133	$ 16,576,694	$ (15,814,560)
VILLAGE OPERATIONS TOTAL	$ 61,367,593	$ 80,019,039	$ (18,651,446)	$ 35,920,539	$ 36,971,674	$ (1,051,135)	$ 12,006,078	$ (13,057,213)	$ 26,197,301	$ 22,877,857	$ 3,319,444	$ 22,210,024	$ (18,890,580)
Internal Service Funds													
Insurance	$ 3,464,436	$ 3,758,070	$ (293,634)	$ 1,666,087	$ 2,209,386	$ (543,299)	$ -	$ (543,299)	$ 1,694,437	$ 1,997,194	$ (302,757)	$ -	$ (302,757)
Equipment Services	1,543,100	2,633,660	(1,090,560)	798,855	690,718	108,137	868,093	(759,956)	811,547	442,431	369,116	354,249	14,867
ST Internal Service Funds	$ 5,007,536	$ 6,391,730	$ (1,384,194)	$ 2,464,942	$ 2,900,104	$ (435,162)	$ 868,093	$ (1,303,255)	$ 2,505,984	$ 2,439,625	$ 66,359	$ 354,249	$ (287,890)
Trust Fund													
Police Pension	$ 4,587,000	$ 2,761,725	$ 1,825,275	$ 3,864,842	$ 1,398,137	$ 2,466,705	$ 375	$ 2,466,330	$ 34,714	$ 1,295,486	$ (1,260,772)	$ 675	$ (1,261,447)
VILLAGE TOTAL	$ 70,962,129	$ 89,172,494	$ (18,210,365)	$ 42,250,323	$ 41,269,915	$ 980,408	$ 12,874,546	$ (11,894,138)	$ 28,737,999	$ 26,612,968	$ 2,125,030	$ 22,564,948	$ (20,439,917)

Glen Ellyn Village Board
535 Duane Street
Glen Ellyn, IL 60137

Meeting 8/30/2021 7:00 PM
Department: Finance
Department Head:
Category: Discussion Item
Prepared By:

AGENDA ITEM (ID # 2021-1322)

DOC ID: 2021-1322

Finance Director Coyle will update the Village Board on the American Rescue Plan funding.

Statement of the Issue:
See attached memo and attachments

Analysis:
N/A

Budget Impact:
N/A

Action Requested:
No action requested - discussion only.

Attachments:

1. American Rescue Plan Spending Proposal
2. IML Coronavirus Local Fiscal Recovery Fund Resource Guide
3. IML How Can Municipalities Spend ARPA Funds
4. Dept of Treasury FAQ as of July 19 2021
5. Lead Service Line Replacement Highlevel Memo
6. Road Map Lead Service Line Replacement
7. 8.11.21 Draft Finance Commission Minutes

MEMORANDUM

DATE: August 8, 2021

TO: President Senak and Board of Trustees

FROM: Christina Coyle, Finance Director

SUBJECT: American Rescue Plan Act

Background

The American Rescue Plan, signed into law on March 11, 2021, provides $1.9 trillion in various stimulus and COVID relief funding. As part of this law, $65 billion was provided for all municipalities, nationwide. At this time, the Village of Glen Ellyn is estimated to receive $3.77 million of this funding. The Village will need to determine the best uses of this funding which aligns with the allowable uses in the law.

Staff has attached some documents about ARPA from other sources which should provide the Village Board with good background on this legislation. These documents are:

> Attachment 1: Illinois Municipal League, "Coronavirus Local Fiscal Recovery Fund Resource Guide"
> Attachment 2: Illinois Municipal League, "How can Municipalities Spend ARPA Funds?"
> Attachment 3: US Department of Treasury, "Compliance and Reporting Guidance"
> Attachment 4: US Department of Treasury, "Coronavirus State and Local Fiscal Recovery Funds, Frequently Asked Questions, as of July 19, 2021

The purpose of the Board discussion is to provide the Village Board with background on the Act and discuss the framework and general allocation ideas. Staff also would appreciate Board feedback on any additional priorities at the meeting. This is anticipated to be the first of several discussions on how to allocate APRA funding. Final decisions on funding are not anticipated to occur at the August 30 meeting.

Funding Amount/Time Period

The Village has been designated as a non-entitlement unit of local government (NEU). This means that the Village's funding will be passed through to the Village from the State rather than directly from the federal government. The Village received notification on July 21, 2021 that the Village is currently estimated to receive $3.77 million in ARPA Funds. Our prior estimation was $3.4 million. The state's portal to request these funds opened on July 22, 2021. The Village has begun the process of requesting these funds and is reviewing the documentation being requested. The first payment is anticipated to be received approximately 30 days after the portal submission is completed and then the second payment 12 months after that. Funds must be obligated by December 2024 and must be spent by December 2026.

High Level Funding Principals

Staff believes it is important for the Village Board to adopt high level funding principals. These should guide all decisions in how to allocate funds:

1. The ARPA funds are one-time funds and should be spent in a way to avoid reoccurring costs and should not be used to replace operating funds, except to the extent that that they mitigate the short-term economic impact of the pandemic to the Village.
2. Outside of costs directly related to a response to the Covid-19 pandemic, to the extent possible, the funds should be used to achieve long-lasting benefits for the Village's residents and businesses. Projects with long-term benefits should be favored over those that have a short-term benefit.
3. Funds should be used in a manner consistent with the guidance and intent of the Act and effort should be made to reduce administrative cost and burden of using the funds.
4. The Village should maintain flexibility to reallocate funding consistent with the program guidelines.

ARPA Spending Categories

The Act highlights five spending categories:

1. Supporting Public Health Expenditures
2. Addressing negative economic impacts caused by the public health emergency
3. Replace lost public sector revenue
4. Premium pay for essential workers
5. Invest in water, sewer and broadband infrastructure

Unallowable Expenses

The Act highlights the following expenses as NOT allowable:

1. Replacing revenues due to a local tax cut or a local tax refund
2. Making pension payments
3. Funding debt service
4. Paying for legal settlements or judgements
5. Depositing funds into a rainy day or creating financial reserves
6. Spending on general infrastructure projects not authorized such as park improvements, playground equipment, or road or bridge maintenance

Recommendation

Staff recommends first replacing the Village's lost revenue. Ensuring the Village remains whole keeps the services that the Village has funded and avoids any necessary tax increases to mitigate lost revenue. This category is also a practical expedient which allows the Village to claim the most revenue with the least amount of administrative burden. The lost revenue amount for 2020 is $1 million. Conservatively, staff would estimate $500,000 for fiscal years 2021, 2022, and 2023. This lost revenue would total $2.5 million. Once the Village has allocated the funding towards lost revenue, it can then use those funds as directed by the Treasury. The Department of Treasury guidance states, *"...gives the recipients broad latitude to use funds for the provision of government services to the extent of reduction of revenue. Government services can include, but are not limited to, maintenance of infrastructure or pay-go spending for new infrastructure, including roads; modernization of cybersecurity, including hardware, software, and protection of critical infrastructure; health services; environmental remediation; school or educational services; and the provision of police, fire and other public safety services."*

If $2.5 million was directed towards lost revenue over the next three years, there would be $1.2 million remaining. Some other suggestions for use could be:

<u>Business Funding – estimate $250K</u> – Staff recommends waiving business registration/fire inspection fees for our businesses again in 2021. The cost of doing this would be $85,000. Staff suggests this program as it benefits all businesses and is an easy way to provide a business incentive. Staff recommends developing another business program with some of the ARPA funds. Guidelines would have to be in line with the ARPA requirements.

<u>Amnesty Program for Water & Sewer – estimate $100K -</u> At the beginning of the pandemic, staff ceased water shut-offs for past due payment. In late summer 2020, staff reinstituted shut-offs for non-payment. However, staff did not assess the shut off fee and staff also would turn water on with some payment (rather than payment in full). The goal was to draw attention to the customer that the account was past due, but to not penalize or create additional financial hardship for that customer. Staff believes that this was accomplished. However, normal procedures are to assess a $75 shut off fee and to not turn water back on till the account is paid in full. As a reminder, those accounts that are shut-off have a bill that has not been paid for three months. Staff will also not shut any customer off that contacts the Village to arrange payment plans prior to shut off. Staff would like to return to normal shut-off policies and procedures. The ARPA funds could be used to create an amnesty program for those that have fallen behind in their Water & Sewer bill. This would then allow the Village to resume normal policies and procedures.

<u>Other entities - $250k -</u> As noted below, the Village has received a request from the Park District for an allocation of ARPA Funds. Other entities that did not receive direct funding would be the Library and GWA. The Village could consider providing those entities with an allocation of funds. Again, those entities would have to justify allowable expenditures in accordance with the ARPA legislation.

Premium Pay – TBD - Premium pay can be provided to those who meet the definition of an essential worker under the Act. It is important to note that this is different from the definition of an essential worker previously. The Department of Treasury defines an essential worker as, "Essential workers are those in critical infrastructure sectors who regularly perform in-person work, interact with others at work, or physically handle items handled by others. Critical infrastructure sectors include healthcare, education and childcare, transportation, sanitation, grocery and food production, and public health and safety, among others, as provided in the Interim Final Rule. Governments receiving Fiscal Recovery Funds have the discretion to add additional sectors to this list, so long as the sectors are considered critical to protect the health and well-being of residents."

Water & Sewer Infrastructure Projects – remaining funds - Any water or sewer project the Village has in its capital plan are eligible. One notable project is the CBD underground utility improvements as part of the street and streetscape project. Also, the replacement of lead lines is another project that the Village could undertake with these funds. Attached is a memo from our Public Works department on lead replacement mandates and estimated costs. Lead replacement (outside of currently identified projects) is currently not funded in our long-term capital plan.

Requests for Funding

The Glen Ellyn Park District has approached the Village requesting to be considered by the Village in its use of ARPA Funds. DuPage County is directing special purpose governments (park district, library, fire protection, etc) to check with local municipalities before requesting funding from the County. The County received $179M of ARPA Funding and currently has $77M of this funding unallocated. The Finance Commission suggested supporting the Park District by offering scholarships/financial assistance for families who cannot afford to participate in programs.

Finance Commission Feedback

The Finance Commission reviewed this item at its August 11 meeting. Generally, the Commission was supportive of the framework. Attached are the draft minutes from that meeting.

Next Steps

Staff requests feedback from the Village Board on the proposal above. The only item imminent in the proposal is to waive the business registration fees as those are nearing renewal, so staff would like the Board's permission to proceed with that item. Staff recommends continuing the discussion as part of the 2022 budget process and making a final decision on how to allocate funds through the budget process.

IML ILLINOIS MUNICIPAL LEAGUE

AMERICAN RESCUE PLAN

Coronavirus Local Fiscal Recovery Fund Resource Guide

On March 11, 2021, President Joseph R. Biden, Jr. signed H.R. 1319, entitled the American Rescue Plan Act (ARPA) of 2021. The law will provide $1.9 trillion in economic stimulus and COVID-19 relief. A complete summary of provisions relevant to municipalities is available on the National League of Cities' website (nlc.org) via this link.

As a resource for our members, the Illinois Municipal League (IML) has developed this overview of how ARPA funds may be utilized by municipalities. **Generally, IML recommends that municipalities use this funding to provide short-term economic stimulus that will have long-term positive economic and community impacts.**

This guide provides the following: 1) what the Act says; 2) what steps municipalities should take first; 3) how municipalities may spend the money in line with federal guidelines; and, 4) recommendations regarding how to utilize this funding in compliance with federal guidelines and best practices.

What Does the Act Say?

Included in ARPA is $65.1 billion in financial assistance for all municipalities, nationwide. Of that, $45.57 billion will be allocated to metropolitan (also known as, entitlement) municipalities, which either are the central city of a metropolitan area or have a population above 50,000. Funds will be distributed based on the Community Development Block Grant (CDBG) formula. The remaining $19.53 billion will be sent to state governments to distribute directly to non-metropolitan municipalities (also known as, non-entitlement) based on population. For non-metropolitan municipalities, the amount of funding they may receive is capped at 75% of the municipality's pre-pandemic budget as of January 27, 2020.

The allocations for metropolitan municipalities in Illinois are available via this link.

More information regarding the distribution of ARPA funds to non-metropolitan units of local government in Illinois is available via this link. Population data from the U.S. Department of the Treasury for non-metropolitan units of local government is available via this link.

Linked here are the allocations for non-metropolitan municipalities from the Illinois Department of Commerce and Economic Opportunity (DCEO).

Based on the Act, municipalities will be allowed to use ARPA funds on eligible costs incurred by December 31, 2024. Eligible costs include:

1. Costs to respond to the public health emergency with respect to COVID-19 or its negative economic impacts, including assistance to households, small businesses and nonprofits, or aid to impacted industries such as tourism, travel and hospitality;
2. Costs to respond to workers performing essential work during the COVID-19 public health emergency by providing premium pay to eligible workers of the municipality that perform essential work, or by providing grants to eligible employers that have eligible workers who perform essential work;
3. Costs for the provision of government services to the extent of the reduction in revenue of a municipality due to the COVID-19 public health emergency relative to revenues collected in the most recent full fiscal year of the municipality; or,
4. Costs to make necessary investments in water, sewer and broadband infrastructure.

What Should Municipalities Do First?

On April 15, 2021, the U.S. Treasury Department released steps (available via this link) that units of local governments should take to receive their funds in a timely fashion once the funds become available.

Metropolitan (entitlement) cities should take the following steps as soon as possible:

- Ensure your community has a valid DUNS number. A DUNS number is a unique nine-character number used to identify an organization and is issued by Dun & Bradstreet. The federal government uses the DUNS number to track how federal money is allocated. A DUNS number is required prior to registering with the federal System for Award Management (SAM) database, which is outlined below. Registering for a DUNS number is free of charge.

  If an entity does not have a valid DUNS number, please visit Dun & Bradstreet's website (available via this link) or call 1-866-705-5711 to begin the registration process.
- Ensure your community has an active SAM registration. SAM is the official government-wide database to register with in order to do business with the U.S. government. All federal financial assistance recipients must register on SAM.gov and renew their SAM registration annually to maintain an active status, to be eligible to receive federal financial assistance. There is no charge to register or maintain an entity's SAM registration.

Non-metropolitan (non-entitlement) cities, which will receive their distribution from the State of Illinois, should take the following steps as soon as possible:

- Ensure your community has a valid DUNS number. A DUNS number is a unique nine-character number used to identify an organization and is issued by Dun & Bradstreet. The federal government uses the DUNS number to track how federal money is allocated. Registering for a DUNS number is free of charge.

If an entity does not have a valid DUNS number, please visit Dun & Bradstreet's website (available via this link) or call 1-866-705-5711 to begin the registration process.

- The State of Illinois has recommended that non-metropolitan communities also ensure an active SAM registration. SAM is the official government-wide database to register with in order to do business with the U.S. government. All federal financial assistance recipients must register on SAM.gov and renew their SAM registration annually to maintain an active status, to be eligible to receive federal financial assistance. There is no charge to register or maintain an entity's SAM registration.

If an entity does not have an active SAM registration, please visit SAM.gov (available via this link) to begin the registration or renewal process. Please note that SAM registration can take up to three weeks; delay in registering could impact the timely payment of funds. The Governor's Office of Management and Budget (GOMB) has provided an overview presentation (available via this link) regarding how to create a SAM registration.

If an entity does not have an active SAM registration, please visit SAM.gov (available via this link) to begin the registration or renewal process. Please note that SAM registration can take up to three weeks; delay in registering could impact the timely payment of funds.

The Governor's Office of Management and Budget (GOMB) has provided an overview presentation (available via this link) regarding how to create a SAM registration.

- Gather the community's payment information, including:
  a) Entity Identification Number (EIN), name and contact information;
  b) Name and title of an authorized representative of the entity; and,
  c) Financial institution information (e.g., routing and account number, financial institution name and contact information).

Where Can Municipalities Request their ARPA Funding?

Metropolitan units of government, are eligible to request their funding directly from the U.S. Department of the Treasury. To submit a request to the Treasury Department, visit their website via this link.

Non-metropolitan units of government must claim their ARPA allotment from the State of Illinois. **The portal (available via this link) is maintained by the Department of Commerce and Economic Opportunity (DCEO).** NEUs must complete the request for funding and submit the required materials through the portal by 5:00 p.m. on September 30, 2021. **NEUs that do not submit their claim to DCEO by 5:00 p.m. on September 30, 2021, will lose their allotment, which may be reallocated by the state.**

After the state has actually received the federal funds and after NEUs have submitted their request and the required materials to DCEO, those NEUs should begin to receive their first funding disbursement from the Illinois Department of Revenue (IDOR). **There could be a delay of approximately 30 days between when everything has been submitted by the NEU to DCEO and when DCEO has authorized IDOR to make the disbursement to the NEU; IDOR will make disbursements promptly once authorized by DCEO.**

How Can Municipalities Spend Their ARPA Funds?

On May 10, 2021, the U.S. Treasury Department released guidance (available via this link) that details the eligible uses for ARPA funds received by municipalities. The main provisions of that guidance are listed below.

Non-metropolitan municipalities in Illinois will receive their allocations, based on population, through the State of Illinois, subject to a cap of not more than 75% of their most recent pre-pandemic annual budget. Non-metropolitan municipalities without formal budgets as of January 27, 2020, will be permitted to self-certify their most recent annual expenditures as of January 27, 2020, for the purpose of calculating the cap.

Local governments will receive funds in two distributions, with 50% provided as early as May 2021 and the balance delivered approximately one year later. The state will not be authorized to restrict or regulate the distribution of funding to non-metropolitan municipalities beyond those required by ARPA and the Treasury Department's implementing regulations and guidance. Recipient municipalities have broad flexibility to decide how best to use this funding to meet the needs of those communities.

Within these overall categories, the Treasury Department's Interim Final Rule (available via this link) provides guidelines and principles for determining the types of programs and services that this funding can support, together with examples of allowable uses that recipients may consider.

Additional information, including examples of eligible uses, on the State and Local Fiscal Recovery Funds is also summarized in the Treasury Department's Fact Sheet (available via this link).

ELIGIBLE USES

Recipients may use Coronavirus State and Local Fiscal Recovery Funds to:

- Support public health expenditures, by funding COVID-19 mitigation efforts, medical expenses, behavioral healthcare and certain public health and safety staff;
- Address negative economic impacts caused by the public health emergency, including economic harms to workers, households, small businesses, impacted industries and the public sector;
- Replace lost public sector revenue, using this funding to provide government services to the extent of the reduction in revenue experienced due to the pandemic;
- Provide premium pay for essential workers, offering additional support to those who have borne and will bear the greatest health risks because of their service in critical infrastructure sectors; and,
- Invest in water, sewer and broadband infrastructure, making necessary investments to improve access to clean drinking water, support vital wastewater and stormwater infrastructure and to expand access to broadband Internet.

INELIGIBLE USES

The Treasury Department's Fact Sheet (available via this link) identifies ineligible uses, including:

- A prohibition against funding to directly or indirectly offset reductions in tax revenue due to a change in law from March 3, 2021, through the last day of the fiscal year in which the funds have been spent (i.e., new state or local tax cuts); and,
- A prohibition against making a deposit into a pension fund for the purpose of reducing an accrued, unfunded liability.

The Treasury Department's Interim Final Rule (available via this link) identifies several other ineligible uses, including:

- Funding debt service;
- Funding legal settlements or judgments;
- Deposits to rainy day funds or financial reserves; and,
- General infrastructure spending is not covered as an eligible use unless the spending is on water, sewer and broadband investments, addressing a specific pandemic public health need or a specific negative economic impact.

REPORTING REQUIREMENTS

Financial records and supporting documents related to ARPA funding must be retained for a period of five years after all funds have been expended or returned to the U.S. Treasury Department, whichever is later. This includes records and documents that demonstrate the funds were used for eligible purposes in accordance with ARPA, Treasury Department regulations implementing those sections and Treasury Department guidance on eligible uses of funds.

Metropolitan cities will be required to submit quarterly project and expenditure reports to the Treasury Department. This report will include financial data, information on contracts and sub-awards in excess of $50,000, types of projects funded and other information regarding an entity's utilization of funds. An interim report on expenditures through July 31, 2021, is due on August 31, 2021. The initial quarterly project and expenditure report is due October 31, 2021, and subsequent reports are due within 30 days of the end of each calendar quarter. Metropolitan cities with a population in excess of 250,000 residents will also be required to submit an annual recovery plan performance report to the Treasury Department. Local governments with fewer than 250,000 residents are not required to submit a recovery plan performance report.

Non-metropolitan cities will be required to submit annual project and expenditure reports to the Treasury Department. The initial annual project and expenditure report for non-metropolitan cities will cover activity from the date of funding to September 30, 2021, and must be submitted to the Treasury Department by October 31, 2021. Subsequent annual reports must be submitted to the Treasury Department by October 31 of each year.

Most of the provisions of the federal Uniform Guidance (2 CFR 200) apply to this program, including the Cost Principles and Single Audit Act requirements. Recipients should refer to the Assistance Listing for detail on the specific provisions of the Uniform Guidance that do not apply to this program. The Assistance Listing is available on beta.SAM.gov via this link.

What Should Municipalities Do With This Funding?

ARPA funding will be critical for communities as they continue to respond to and recover from the COVID-19 public health emergency. IML encourages municipalities to utilize their funding in a way that both addresses short-term economic needs and provides long-term benefits to their communities. **IML urges communities to remember some basic principles when it comes to utilizing this one-time funding:**

- **Review the Guidance.** It is important for municipal officials and staff to review the U.S. Treasury Department's guidance in full before making any funding decisions. IML recommends community leaders consult with their finance officer or treasurer and legal counsel regarding the eligible uses of ARPA funding.

- **Don't be Afraid to Ask Questions.** Asking questions about this funding will help ensure all of the important issues are addressed before funding is depleted. The Treasury Department has already answered many questions related to their guidance in their Frequently Asked Questions document (available via this link). General inquiries regarding the guidance can be submitted to the Treasury Department by email at SLFRP@treasury.gov. IML will continue to provide new information as it is developed and available, as a resource to IML member municipalities.

- **Engage with Stakeholders and the Public.** Listen to stakeholders and provide ample, open opportunity for the public to discuss how ARPA funding for your community could be utilized. Public engagement on the programs and projects funded will be important to ensure short- and long-term benefits and transparency.

- **Ensure Compliance with all Reporting Requirements.** The Treasury Department requires that both metropolitan and non-metropolitan municipalities meet various reporting requirements and deadlines. Not meeting those requirements could subject a municipality to repayment of funds to the federal government that have already been spent.

- **Take Your Time.** These funds are not required to be spent right away. Per the Treasury Department's Interim Final Rule (available via this link), local governments have until December 31, 2024, to obligate the funding. There is time to plan and implement an open and thorough process that ensures the funding is being used in a way that provides the best short-term stimulus that has long-term positive impacts in each community.

Treasury Department Resources

- U.S. Department of the Treasury Website Regarding Coronavirus State and Local Fiscal Recovery Funds
- Interim Final Rule for Coronavirus State and Local Fiscal Recovery Funds
- Coronavirus State and Local Fiscal Recovery Funds Fact Sheet
- Coronavirus State and Local Fiscal Recovery Funds Quick Reference Guide
- Compliance and Reporting Guidance for the State and Local Fiscal Recovery Funds
- Coronavirus Local Fiscal Recovery Fund Guidance Regarding Distribution of Funds to Non-Metropolitan Units of Local Government
- Coronavirus State and Local Fiscal Recovery Funds Frequently Asked Questions
- Frequently Asked Questions Regarding Distribution of Funds to Non-Entitlement Units of Local Government

Other ARPA Resources

- Illinois Municipal League COVID-19 Resources Website
- Illinois Department of Commerce and Economic Opportunity's ARPA Website for Non-Metropolitan Units of Government
- National League of Cities Website on COVID-19 Pandemic Response & Relief
- U.S. Conference of Mayors American Rescue Plan Resource Center
- National Association of Counties COVID-19 Recovery Clearinghouse

ILLINOIS MUNICIPAL LEAGUE

AMERICAN RESCUE PLAN

How Can Municipalities Spend ARPA Funds?

Municipalities across the state either have been or will be receiving federal funding due to the passage of the American Rescue Plan Act (ARPA) of 2021. ARPA funding can be utilized in various ways and is fully described in the U.S. Department of the Treasury's Guidance (available via this link). Municipalities have until December 31, 2024, to obligate ARPA funds and all ARPA funds must be spent by December 31, 2026.

Below are some examples of how municipalities can utilize ARPA funding.

Municipalities CAN Spend ARPA Funds on:

- PROVIDING SERVICES AND PROGRAMS TO CONTAIN AND MITIGATE THE SPREAD OF COVID-19:
  - Testing and contact tracing efforts
  - Enforcement of public health orders
  - Purchasing personal protective equipment
  - Capital investments in public facilities to meet pandemic operational needs
- PROVIDING SERVICES TO ADDRESS BEHAVIORAL HEALTHCARE NEEDS EXACERBATED BY THE PANDEMIC:
  - Hotlines and warmlines
  - Crisis intervention
- COVERING PAYROLL AND BENEFITS FOR EMPLOYEES TO THE EXTENT THEY WORK ON COVID-19 RESPONSE:
  - Full payroll and benefits for public safety employees
- PROVIDING ECONOMIC AID:
  - Providing aid and job training to unemployed residents
  - Providing survivor's benefits for family members of COVID-19 victims
  - Supporting small businesses
  - Providing aid to tourism, travel and hospitality sectors
  - Rebuilding public sector capacity
- REPLACING LOST REVENUE:
  - Municipalities seeking to replace lost revenue will have to follow additional guidance. More information about that guidance is available from IML's federal partner, the National League of Cities, via this link.
- SERVING THE HARDEST-HIT COMMUNITIES AND FAMILIES
- PROVIDING PREMIUM PAY TO ESSENTIAL WORKERS
- INVESTING IN WATER AND SEWER INFRASTRUCTURE:
  - Replacing lead service lines
  - Building or upgrading facilities and transmission, distribution and storage systems
  - Constructing publicly-owned wastewater treatment infrastructure
  - Managing and treating stormwater or subsurface drainage water
  - Facilitating water reuse
  - Securing publicly-owned treatment works
- INVESTING IN BROADBAND INFRASTRUCTURE

Municipalities CANNOT Spend ARPA Funds on:

- Replacing revenues due to a local tax cut or local tax refund enacted after March 3, 2021.
- Making pension payments.
- Funding debt service.
- Paying for legal settlements or judgments.
- Depositing into a rainy day fund or creating financial reserves.
- Spending on general infrastructure projects not authorized above, such as:
  - Park improvements;
  - Playground equipment; or,
  - Road and bridge maintenance.

ILLINOIS MUNICIPAL LEAGUE

AMERICAN RESCUE PLAN

How Can Municipalities Spend ARPA Funds?

Municipalities across the state either have been or will be receiving federal funding due to the passage of the American Rescue Plan Act (ARPA) of 2021. ARPA funding can be utilized in various ways and is fully described in the U.S. Department of the Treasury's Guidance (available via this link). Municipalities have until December 31, 2024, to obligate ARPA funds and all ARPA funds must be spent by December 31, 2026.

Below are some examples of how municipalities can utilize ARPA funding.

Municipalities CAN Spend ARPA Funds on:

- PROVIDING SERVICES AND PROGRAMS TO CONTAIN AND MITIGATE THE SPREAD OF COVID-19:
  - Testing and contact tracing efforts
  - Enforcement of public health orders
  - Purchasing personal protective equipment
  - Capital investments in public facilities to meet pandemic operational needs
- PROVIDING SERVICES TO ADDRESS BEHAVIORAL HEALTHCARE NEEDS EXACERBATED BY THE PANDEMIC:
  - Hotlines and warmlines
  - Crisis intervention
- COVERING PAYROLL AND BENEFITS FOR EMPLOYEES TO THE EXTENT THEY WORK ON COVID-19 RESPONSE:
  - Full payroll and benefits for public safety employees
- PROVIDING ECONOMIC AID:
  - Providing aid and job training to unemployed residents
  - Providing survivor's benefits for family members of COVID-19 victims
  - Supporting small businesses
  - Providing aid to tourism, travel and hospitality sectors
  - Rebuilding public sector capacity
- REPLACING LOST REVENUE:
  - Municipalities seeking to replace lost revenue will have to follow additional guidance. More information about that guidance is available from IML's federal partner, the National League of Cities, via this link.
- SERVING THE HARDEST-HIT COMMUNITIES AND FAMILIES
- PROVIDING PREMIUM PAY TO ESSENTIAL WORKERS
- INVESTING IN WATER AND SEWER INFRASTRUCTURE:
  - Replacing lead service lines
  - Building or upgrading facilities and transmission, distribution and storage systems
  - Constructing publicly-owned wastewater treatment infrastructure
  - Managing and treating stormwater or subsurface drainage water
  - Facilitating water reuse
  - Securing publicly-owned treatment works
- INVESTING IN BROADBAND INFRASTRUCTURE

Municipalities CANNOT Spend ARPA Funds on:

- Replacing revenues due to a local tax cut or local tax refund enacted after March 3, 2021.
- Making pension payments.
- Funding debt service.
- Paying for legal settlements or judgments.
- Depositing into a rainy day fund or creating financial reserves.
- Spending on general infrastructure projects not authorized above, such as:
  - Park improvements;
  - Playground equipment; or,
  - Road and bridge maintenance.

Coronavirus State and Local Fiscal Recovery Funds

Frequently Asked Questions

AS OF JULY 19, 2021

This document contains answers to frequently asked questions regarding the Coronavirus State and Local Fiscal Recovery Funds (CSFRF / CLFRF, or Fiscal Recovery Funds). Treasury will be updating this document periodically in response to questions received from stakeholders. Recipients and stakeholders should consult the Interim Final Rule for additional information.

- For overall information about the program, including information on requesting funding, please see https://home.treasury.gov/policy-issues/coronavirus/assistance-for-state-local-and-tribal-governments
- For general questions about CSFRF / CLFRF, please email SLFRP@treasury.gov
- Treasury is seeking comment on all aspects of the Interim Final Rule. Stakeholders are encouraged to submit comments electronically through the Federal eRulemaking Portal (https://www.regulations.gov/document/TREAS-DO-2021-0008-0002) on or before July 16, 2021. Please be advised that comments received will be part of the public record and subject to public disclosure. Do not disclose any information in your comment or supporting materials that you consider confidential or inappropriate for public disclosure.

Questions added 5/27/21: 1.5, 1.6, 2.13, 2.14, 2.15, 3.9, 4.5, 4.6, 10.3, 10.4 (noted with "[5/27]")

Questions added 6/8/21: 2.16, 3.10, 3.11, 3.12, 4.7, 6.7, 8.2, 9.4, 9.5, 10.5 (noted with "[6/8]")

Questions added 6/17/21: 6.8, 6.9, 6.10, 6.11 (noted with "[6/17]")

Questions added 6/23/21: 1.7, 2.17, 2.18, 2.19, 2.20, 3.1 (appendix), 3.13, 4.8, 6.12 (noted with "[6/23]")

Question added 6/24/21: 2.21 (noted with "[6/24]")

Questions added 7/14/21: 1.8, 3.14, 3.15, 4.9, 4.10, 4.11, 4.12, 6.13, 6.14, 6.15, 6.16, 6.17, 10.3 updated (noted with "[7/14]")

Answers to frequently asked questions on distribution of funds to non-entitlement units of local government (NEUs) can be found in this FAQ supplement, which is regularly updated.

1. Eligibility and Allocations

1.1. Which governments are eligible for funds?

The following governments are eligible:

- States and the District of Columbia
- Territories
- Tribal governments
- Counties
- Metropolitan cities
- Non-entitlement units, or smaller local governments

1.2. Which governments receive funds directly from Treasury?

Treasury will distribute funds directly to each eligible state, territory, metropolitan city, county, or Tribal government. Smaller local governments that are classified as non-entitlement units will receive funds through their applicable state government.

1.3. Are special-purpose units of government eligible to receive funds?

Special-purpose units of local government will not receive funding allocations; however, a state, territory, local, or Tribal government may transfer funds to a special-purpose unit of government. Special-purpose districts perform specific functions in the community, such as fire, water, sewer or mosquito abatement districts.

1.4. How are funds being allocated to Tribal governments, and how will Tribal governments find out their allocation amounts?[1]

$20 billion of Fiscal Recovery Funds was reserved for Tribal governments. The American Rescue Plan Act specifies that $1 billion will be allocated evenly to all eligible Tribal governments. The remaining $19 billion will be distributed using an allocation methodology based on enrollment and employment.

There will be two payments to Tribal governments. Each Tribal government's first payment will include (i) an amount in respect of the $1 billion allocation that is to be divided equally among eligible Tribal governments and (ii) each Tribal government's pro rata share of the Enrollment Allocation. Tribal governments will be notified of their allocation amount and delivery of payment 4-5 days after completing request for funds in the Treasury Submission Portal. The deadline to make the initial request for funds is June 21, 2021.

The second payment will include a Tribal government's pro rata share of the Employment Allocation. There is a $1,000,000 minimum employment allocation for Tribal governments. In late-June, Tribal governments will receive an email notification to re-enter the Treasury Submission Portal to confirm or amend their 2019 employment numbers that were submitted to the Department of the Treasury for the CARES Act's Coronavirus Relief Fund. To receive an Employment Allocation, including the minimum employment allocation, Tribal governments must confirm employment numbers by July

[1] The answer to this question was updated on July 19, 2021.

23, 2021. Treasury will calculate employment allocations for those Tribal governments that confirmed or submitted amended employment numbers by the deadline. In August, Treasury will communicate to Tribal governments the amount of their portion of the Employment Allocation and the anticipated date for the second payment.

1.5. My county is a unit of general local government with population under 50,000. Will my county receive funds directly from Treasury? [5/27]

Yes. All counties that are units of general local government will receive funds directly from Treasury and should apply via the online portal. The list of county allocations is available here.

1.6. My local government expected to be classified as a non-entitlement unit. Instead, it was classified as a metropolitan city. Why? [5/27]

The American Rescue Plan Act defines, for purposes of the Coronavirus Local Fiscal Recovery Fund (CLFRF), metropolitan cities to include those that are currently metropolitan cities under the Community Development Block Grant (CDBG) program but also those cities that relinquish or defer their status as a metropolitan city for purposes of the CDBG program. This would include, by way of example, cities that are principal cities of their metropolitan statistical area, even if their population is less than 50,000. In other words, a city that is eligible to be a metropolitan city under the CDBG program is eligible as a metropolitan city under the CLFRF, regardless of how that city has elected to participate in the CDBG program.

Unofficial allocation estimates produced by other organizations may have classified certain local governments as non-entitlement units of local government. However, based on the statutory definitions, some of these local governments should have been classified as metropolitan cities.

1.7. In order to receive and use Fiscal Recovery Funds, must a recipient government maintain a declaration of emergency relating to COVID-19? [6/23]

No. Neither the statute establishing the CSFRF/CLFRF nor the Interim Final Rule requires recipients to maintain a local declaration of emergency relating to COVID-19.

1.8. Can non-profit or private organizations receive funds? If so, how? [7/14]

Yes. Under section 602(c)(3) of the Social Security Act, a State, territory, or Tribal government may transfer funds to a "private nonprofit organization . . . , a Tribal organization . . . , a public benefit corporation involved in the transportation of passengers or cargo, or a special-purpose unit of State or local government." Similarly, section 603(c)(3) authorizes a local government to transfer funds to the same entities (other than Tribal organizations). The Interim Final Rule clarifies that the lists of transferees in sections 602(c)(3) and 603(c)(3) are not exclusive, and recipients may transfer funds to constituent units of government or private entities beyond those specified in the statute. A transferee receiving a transfer from a recipient under sections 602(c)(3) and 603(c)(3) will be considered to be a subrecipient and will be expected to comply with all subrecipient reporting requirements.

The ARPA does not authorize Treasury to provide CSFRF/CLFRF funds directly to non-profit or private organizations. Thus, non-profit or private organizations should seek funds from CSFRF/CLFRF recipient(s) in their jurisdiction (e.g., a State, local, territorial, or Tribal government).

2. Eligible Uses – Responding to the Public Health Emergency / Negative Economic Impacts

2.1. What types of COVID-19 response, mitigation, and prevention activities are eligible?

A broad range of services are needed to contain COVID-19 and are eligible uses, including vaccination programs; medical care; testing; contact tracing; support for isolation or quarantine; supports for vulnerable populations to access medical or public health services; public health surveillance (e.g., monitoring case trends, genomic sequencing for variants); enforcement of public health orders; public communication efforts; enhancement to health care capacity, including through alternative care facilities; purchases of personal protective equipment; support for prevention, mitigation, or other services in congregate living facilities (e.g., nursing homes, incarceration settings, homeless shelters, group living facilities) and other key settings like schools; ventilation improvements in congregate settings, health care settings, or other key locations; enhancement of public health data systems; and other public health responses. Capital investments in public facilities to meet pandemic operational needs are also eligible, such as physical plant improvements to public hospitals and health clinics or adaptations to public buildings to implement COVID-19 mitigation tactics.

2.2. If a use of funds was allowable under the Coronavirus Relief Fund (CRF) to respond to the public health emergency, may recipients presume it is also allowable under CSFRF/CLFRF?

Generally, funding uses eligible under CRF as a response to the direct public health impacts of COVID-19 will continue to be eligible under CSFRF/CLFRF, with the following two exceptions: (1) the standard for eligibility of public health and safety payrolls has been updated; and (2) expenses related to the issuance of tax-anticipation notes are not an eligible funding use.

2.3. If a use of funds is not explicitly permitted in the Interim Final Rule as a response to the public health emergency and its negative economic impacts, does that mean it is prohibited?

The Interim Final Rule contains a non-exclusive list of programs or services that may be funded as responding to COVID-19 or the negative economic impacts of the COVID-19 public health emergency, along with considerations for evaluating other potential uses of Fiscal Recovery Funds not explicitly listed. The Interim Final Rule also provides flexibility for recipients to use Fiscal Recovery Funds for programs or services that are not identified on these non-exclusive lists but which meet the objectives of section 602(c)(1)(A) or 603(c)(1)(A) by responding to the COVID-19 public health emergency with respect to COVID-19 or its negative economic impacts.

2.4. May recipients use funds to respond to the public health emergency and its negative economic impacts by replenishing state unemployment funds?

Consistent with the approach taken in the CRF, recipients may make deposits into the state account of the Unemployment Trust Fund up to the level needed to restore the pre-pandemic balances of such account as of January 27, 2020, or to pay back advances received for the payment of benefits between January 27, 2020 and the date when the Interim Final Rule is published in the Federal Register.

2.5. What types of services are eligible as responses to the negative economic impacts of the pandemic?

Eligible uses in this category include assistance to households; small businesses and non-profits; and aid to impacted industries.

Assistance to households includes, but is not limited to: food assistance; rent, mortgage, or utility assistance; counseling and legal aid to prevent eviction or homelessness; cash assistance; emergency assistance for burials, home repairs, weatherization, or other needs; internet access or digital literacy assistance; or job training to address negative economic or public health impacts experienced due to a worker's occupation or level of training.

Assistance to small business and non-profits includes, but is not limited to:

- loans or grants to mitigate financial hardship such as declines in revenues or impacts of periods of business closure, for example by supporting payroll and benefits costs, costs to retain employees, mortgage, rent, or utilities costs, and other operating costs;
- Loans, grants, or in-kind assistance to implement COVID-19 prevention or mitigation tactics, such as physical plant changes to enable social distancing, enhanced cleaning efforts, barriers or partitions, or COVID-19 vaccination, testing, or contact tracing programs; and
- Technical assistance, counseling, or other services to assist with business planning needs

2.6. May recipients use funds to respond to the public health emergency and its negative economic impacts by providing direct cash transfers to households?

Yes, provided the recipient considers whether, and the extent to which, the household has experienced a negative economic impact from the pandemic. Additionally, cash transfers must be reasonably proportional to the negative economic impact they are intended to address. Cash transfers grossly in excess of the amount needed to address the negative economic impact identified by the recipient would not be considered to be a response to the COVID-19 public health emergency or its negative impacts. In particular, when considering appropriate size of permissible cash transfers made in response to the COVID-19 public health emergency, state, local, territorial, and Tribal governments may consider and take guidance from the per person amounts previously provided by the federal government in response to the COVID crisis.

2.7. May funds be used to reimburse recipients for costs incurred by state and local governments in responding to the public health emergency and its negative economic impacts prior to passage of the American Rescue Plan?

Use of Fiscal Recovery Funds is generally forward looking. The Interim Final Rule permits funds to be used to cover costs incurred beginning on March 3, 2021.

2.8. May recipients use funds for general economic development or workforce development?

Generally, not. Recipients must demonstrate that funding uses directly address a negative economic impact of the COVID-19 public health emergency, including funds used for economic or workforce development. For example, job training for unemployed workers may be used to address negative economic impacts of the public health emergency and be eligible.

2.9. How can recipients use funds to assist the travel, tourism, and hospitality industries?

Aid provided to tourism, travel, and hospitality industries should respond to the negative economic impacts of the pandemic. For example, a recipient may provide aid to support safe reopening of businesses in the tourism, travel and hospitality industries and to districts that were closed during the COVID-19 public health emergency, as well as aid a planned expansion or upgrade of tourism, travel and hospitality facilities delayed due to the pandemic.

Tribal development districts are considered the commercial centers for tribal hospitality, gaming, tourism and entertainment industries.

2.10. May recipients use funds to assist impacted industries other than travel, tourism, and hospitality?

Yes, provided that recipients consider the extent of the impact in such industries as compared to tourism, travel, and hospitality, the industries enumerated in the statute. For example, nationwide the leisure and hospitality industry has experienced an approximately 17 percent decline in employment and 24 percent decline in revenue, on net, due to the COVID-19 public health emergency. Recipients should also consider whether impacts were due to the COVID-19 pandemic, as opposed to longer-term economic or industrial trends unrelated to the pandemic.

Recipients should maintain records to support their assessment of how businesses or business districts receiving assistance were affected by the negative economic impacts of the pandemic and how the aid provided responds to these impacts.

2.11. How does the Interim Final Rule help address the disparate impact of COVID-19 on certain populations and geographies?

In recognition of the disproportionate impacts of the COVID-19 virus on health and economic outcomes in low-income and Native American communities, the Interim Final Rule identifies a broader range of services and programs that are considered to be in response to the public health emergency when provided in these communities. Specifically, Treasury will presume that certain types of services are eligible uses when provided in a Qualified Census Tract (QCT), to families living in QCTs, or when these services are provided by Tribal governments.

Recipients may also provide these services to other populations, households, or geographic areas disproportionately impacted by the pandemic. In identifying these disproportionately-impacted communities, recipients should be able to support their determination for how the pandemic disproportionately impacted the populations, households, or geographic areas to be served.

Eligible services include:

- Addressing health disparities and the social determinants of health, including: community health workers, public benefits navigators, remediation of lead paint or other lead hazards, and community violence intervention programs;

- Building stronger neighborhoods and communities, including: supportive housing and other services for individuals experiencing homelessness, development of affordable housing, and housing vouchers and assistance relocating to neighborhoods with higher levels of economic opportunity;

- Addressing educational disparities exacerbated by COVID-19, including: early learning services, increasing resources for high-poverty school districts, educational services like tutoring or afterschool programs, and supports for students' social, emotional, and mental health needs; and

- Promoting healthy childhood environments, including: child care, home visiting programs for families with young children, and enhanced services for child welfare-involved families and foster youth.

2.12. May recipients use funds to pay for vaccine incentive programs (e.g., cash or in-kind transfers, lottery programs, or other incentives for individuals who get vaccinated)?

Yes. Under the Interim Final Rule, recipients may use Coronavirus State and Local Fiscal Recovery Funds to respond to the COVID-19 public health emergency, including expenses related to COVID-19 vaccination programs. See 31 CFR 35.6(b)(1)(i). Programs that provide incentives reasonably expected to increase the number of people who choose to get vaccinated, or that motivate people to get vaccinated sooner than they otherwise would have, are an allowable use of funds so long as such costs are reasonably proportional to the expected public health benefit.

2.13. May recipients use funds to pay "back to work incentives" (e.g., cash payments for newly employed workers after a certain period of time on the job)? [5/27]

Yes. Under the Interim Final Rule, recipients may use Coronavirus State and Local Fiscal Recovery Funds to provide assistance to unemployed workers. See 31 CFR 35.6(b)(4). This assistance can include job training or other efforts to accelerate rehiring and thus reduce unemployment, such as childcare assistance, assistance with transportation to and from a jobsite or interview, and incentives for newly employed workers.

2.14. The Coronavirus Relief Fund (CRF) included as an eligible use: "Payroll expenses for public safety, public health, health care, human services, and similar employees whose services are substantially dedicated to mitigating or responding to the COVID-19 public health emergency." What has changed in CSFRF/CLFRF, and what type of documentation is required under CSFRF/CLFRF? [5/27]

Many of the expenses authorized under the Coronavirus Relief Fund are also eligible uses under the CSFRF/CLFRF. However, in the case of payroll expenses for public safety, public health, health care, human services, and similar employees (hereafter, public health and safety staff), the CSFRF/CLFRF does differ from the CRF. This change reflects the differences between the ARPA and CARES Act and recognizes that the response to the COVID-19 public health emergency has changed and will continue to change over time. In particular, funds may be used for payroll and covered benefits expenses for public safety, public health, health care, human services, and similar employees, including first responders, to the extent that the employee's time that is dedicated to responding to the COVID-19 public health emergency.

For administrative convenience, the recipient may consider a public health and safety employee to be entirely devoted to mitigating or responding to the COVID-19 public health emergency, and therefore fully covered, if the employee, or his or her operating unit or division, is primarily dedicated (e.g., more than half of the employee's time is dedicated) to responding to the COVID-19 public health emergency.

Recipients may use presumptions for assessing whether an employee, division, or operating unit is primarily dedicated to COVID-19 response. The recipient should maintain records to support its assessment, such as payroll records, attestations from supervisors or staff, or regular work product or correspondence demonstrating work on the COVID-19 response. Recipients need not routinely track staff hours. Recipients should periodically reassess their determinations.

2.15. What staff are included in "public safety, public health, health care, human services, and similar employees"? Would this include, for example, 911 operators, morgue staff, medical examiner staff, or EMS staff? [5/27]

As discussed in the Interim Final Rule, funds may be used for payroll and covered benefits expenses for public safety, public health, health care, human services, and similar employees, for the portion of the employee's time that is dedicated to responding to the COVID-19 public health emergency.

Public safety employees would include police officers (including state police officers), sheriffs and deputy sheriffs, firefighters, emergency medical responders, correctional and detention officers, and those who directly support such employees such as dispatchers and supervisory personnel. Public health employees would include employees involved in providing medical and other health services to patients and supervisory personnel, including medical staff assigned to schools, prisons, and other such institutions, and other support services essential for patient care (e.g., laboratory technicians, medical examiner or morgue staff) as well as employees of public health departments directly engaged in matters related to public health and related supervisory personnel. Human services staff include employees providing or administering social services; public benefits; child welfare services; and child, elder, or family care, as well as others.

2.16. May recipients use funds to establish a public jobs program? [6/8]

Yes. The Interim Final Rule permits a broad range of services to unemployed or underemployed workers and other individuals that suffered negative economic impacts from the pandemic. That can include public jobs programs, subsidized employment, combined education and on-the-job training programs, or job training to accelerate rehiring or address negative economic or public health impacts experienced due to a worker's occupation or level of training. The broad range of permitted services can also include other employment supports, such as childcare assistance or assistance with transportation to and from a jobsite or interview.

The Interim Final Rule includes as an eligible use re-hiring public sector staff up to the government's level of pre-pandemic employment. "Public sector staff" would not include individuals participating in a job training or subsidized employment program administered by the recipient.

2.17. The Interim Final Rule states that "assistance or aid to individuals or businesses that did not experience a negative economic impact from the public health emergency would not be an eligible use under this category." Are recipients

required to demonstrate that each individual or business experienced a negative economic impact for that individual or business to receive assistance? [6/23]

Not necessarily. The Interim Final Rule allows recipients to demonstrate a negative economic impact on a population or group and to provide assistance to households or businesses that fall within that population or group. In such cases, the recipient need only demonstrate that the household or business is within the population or group that experienced a negative economic impact.

For assistance to households, the Interim Final Rule states, "In assessing whether a household or population experienced economic harm as a result of the pandemic, a recipient may presume that a household or population that experienced unemployment or increased food or housing insecurity or is low- or moderate-income experienced negative economic impacts resulting from the pandemic." This would allow, for example, an internet access assistance program for all low- or moderate-income households, but would not require the recipient to demonstrate or document that each individual low- or -moderate income household experienced a negative economic impact from the COVID-19 public health emergency apart from being low- or -moderate income.

For assistance to small businesses, the Interim Final Rule states that assistance may be provided to small businesses, including loans, grants, in-kind assistance, technical assistance or other services, to respond to the negative economic impacts of the COVID-19 public health emergency. In providing assistance to small businesses, recipients must design a program that responds to the negative economic impacts of the COVID-19 public health emergency, including by identifying how the program addresses the identified need or impact faced by small businesses. This can include assistance to adopt safer operating procedures, weather periods of closure, or mitigate financial hardship resulting from the COVID-19 public health emergency.

As part of program design and to ensure that the program responds to the identified need, recipients may consider additional criteria to target assistance to businesses in need, including to small businesses. Assistance may be targeted to businesses facing financial insecurity, with substantial declines in gross receipts (e.g., comparable to measures used to assess eligibility for the Paycheck Protection Program), or facing other economic harm due to the pandemic, as well as businesses with less capacity to weather financial hardship, such as the smallest businesses, those with less access to credit, or those serving disadvantaged communities. For example, a recipient could find based on local data or research that the smallest businesses faced sharply increased risk of bankruptcy and develop a program to respond; such a program would only need to document a population or group-level negative economic impact, and eligibility criteria to limit access to the program to that population or group (in this case, the smallest businesses).

In addition, recognizing the disproportionate impact of the pandemic on disadvantaged communities, the Interim Final Rule also identifies a set of services that are presumptively eligible when provided in a Qualified Census Tract (QCT); to families and individuals living in QCTs; to other populations, households, or geographic areas identified by the recipient as disproportionately impacted by the pandemic; or when these services are provided by Tribal governments. For more information on the set of presumptively eligible services, see the Interim Final Rule section on *Building Stronger Communities through Investments in Housing and Neighborhoods* and FAQ 2.11.

2.18. Would investments in improving outdoor spaces (e.g. parks) be an eligible use of funds as a response to the public health emergency and/or its negative economic impacts? [6/23]

There are multiple ways that investments in improving outdoor spaces could qualify as eligible uses; several are highlighted below, though there may be other ways that a specific investment in outdoor spaces would meet eligible use criteria.

First, in recognition of the disproportionate negative economic impacts on certain communities and populations, the Interim Final Rule identifies certain types of services that are eligible uses when provided in a Qualified Census Tract (QCT), to families and individuals living in QCTs, or when these services are provided by Tribal governments. Recipients may also provide these services to other populations, households, or geographic areas disproportionately impacted by the pandemic.

These programs and services include services designed to build stronger neighborhoods and communities and to address health disparities and the social determinants of health. The Interim Final Rule provides a non-exhaustive list of eligible services to respond to the needs of communities disproportionately impacted by the pandemic, and recipients may identify other uses of funds that do so, consistent with the Rule's framework. For example, investments in parks, public plazas, and other public outdoor recreation spaces may be responsive to the needs of disproportionately impacted communities by promoting healthier living environments and outdoor recreation and socialization to mitigate the spread of COVID-19.

Second, recipients may provide assistance to small businesses in all communities. Assistance to small businesses could include support to enhance outdoor spaces for COVID-19 mitigation (e.g., restaurant patios) or to improve the built environment of the neighborhood (e.g., façade improvements).

Third, many governments saw significantly increased use of parks during the pandemic that resulted in damage or increased maintenance needs. The Interim Final Rule recognizes that "decrease[s to] a state or local government's ability to effectively administer services" can constitute a negative economic impact of the pandemic.

2.19. Would expenses to address a COVID-related backlog in court cases be an eligible use of funds as a response to the public health emergency? [6/23]

The Interim Final Rule recognizes that "decrease[s to] a state or local government's ability to effectively administer services," such as cuts to public sector staffing levels, can constitute a negative economic impact of the pandemic. During the COVID-19 public health emergency, many courts were unable to operate safely during the pandemic and, as a result, now face significant backlogs. Court backlogs resulting from inability of courts to safely operate during the COVID-19 pandemic decreased the government's ability to administer services. Therefore, steps to reduce these backlogs, such as implementing COVID-19 safety measures to facilitate court operations, hiring additional court staff or attorneys to increase speed of case resolution, and other expenses to expedite case resolution are eligible uses.

2.20. Can funds be used to assist small business startups as a response to the negative economic impact of COVID-19? [6/23]

As discussed in the Interim Final Rule, recipients may provide assistance to small businesses that responds to the negative economic impacts of COVID-19. The Interim Final Rule provides a non-exclusive list of potential assistance mechanisms, as well as considerations for ensuring that such assistance is responsive to the negative economic impacts of COVID-19.

Treasury acknowledges a range of potential circumstances in which assisting small business startups could be responsive to the negative economic impacts of COVID-19, including for small businesses and individuals seeking to start small businesses after the start of the COVID-19 public health emergency. For example:

- A recipient could assist small business startups with additional costs associated with COVID-19 mitigation tactics (e.g., barriers or partitions; enhanced cleaning; or physical plant changes to enable greater use of outdoor space).
- A recipient could identify and respond to a negative economic impact of COVID-19 on new small business startups; for example, if it could be shown that small business startups in a locality were facing greater difficult accessing credit than prior to the pandemic, faced increased costs to starting the business due to the pandemic, or that the small business had lost expected startup capital due to the pandemic.
- The Interim Final Rule also discusses eligible uses that provide support for individuals who have experienced a negative economic impact from the COVID-19 public health emergency, including uses that provide job training for unemployed individuals. These initiatives also may support small business startups and individuals seeking to start small businesses.

2.21. Can funds be used for eviction prevention efforts or housing stability services? [6/24]

Yes. Responses to the negative economic impacts of the pandemic include "rent, mortgage, or utility assistance [and] counseling and legal aid to prevent eviction or homelessness." This includes housing stability services that enable eligible households to maintain or obtain housing, such as housing counseling, fair housing counseling, case management related to housing stability, outreach to households at risk of eviction or promotion of housing support programs, housing related services for survivors of domestic abuse or human trafficking, and specialized services for individuals with disabilities or seniors that supports their ability to access or maintain housing.

This also includes legal aid such as legal services or attorney's fees related to eviction proceedings and maintaining housing stability, court-based eviction prevention or eviction diversion programs, and other legal services that help households maintain or obtain housing.

Recipients may transfer funds to, or execute grants or contracts with, court systems, non-profits, and a wide range of other organizations to implement these strategies.

3. Eligible Uses – Revenue Loss

3.1. How is revenue defined for the purpose of this provision? [appendix added 6/23]

The Interim Final Rule adopts a definition of "General Revenue" that is based on, but not identical, to the Census Bureau's concept of "General Revenue from Own Sources" in the Annual Survey of State and Local Government Finances.

General Revenue includes revenue from taxes, current charges, and miscellaneous general revenue. It excludes refunds and other correcting transactions, proceeds from issuance of debt or the sale of investments, agency or private trust transactions, and revenue generated by utilities and insurance trusts. General revenue also includes intergovernmental transfers between state and local governments, but excludes intergovernmental transfers from the Federal government, including Federal transfers made via a state to a locality pursuant to the CRF or the Fiscal Recovery Funds.

Tribal governments may include all revenue from Tribal enterprises and gaming operations in the definition of General Revenue.

Please see the appendix for a diagram of the Interim Final Rule's definition of General Revenue within the Census Bureau's revenue classification structure.

3.2. Will revenue be calculated on an entity-wide basis or on a source-by-source basis (e.g. property tax, income tax, sales tax, etc.)?

Recipients should calculate revenue on an entity-wide basis. This approach minimizes the administrative burden for recipients, provides for greater consistency across recipients, and presents a more accurate representation of the net impact of the COVID- 19 public health emergency on a recipient's revenue, rather than relying on financial reporting prepared by each recipient, which vary in methodology used and which generally aggregates revenue by purpose rather than by source.

3.3. Does the definition of revenue include outside concessions that contract with a state or local government?

Recipients should classify revenue sources as they would if responding to the U.S. Census Bureau's Annual Survey of State and Local Government Finances. According to the Census Bureau's [Government Finance and Employment Classification manual](), the following is an example of current charges that would be included in a state or local government's general revenue from own sources: "Gross revenue of facilities operated by a government (swimming pools, recreational marinas and piers, golf courses, skating rinks, museums, zoos, etc.); auxiliary facilities in public recreation areas (camping areas, refreshment stands, gift shops, etc.); lease or use fees from stadiums, auditoriums, and community and convention centers; and rentals from concessions at such facilities."

3.4. What is the time period for estimating revenue loss? Will revenue losses experienced prior to the passage of the Act be considered?

Recipients are permitted to calculate the extent of reduction in revenue as of four points in time: December 31, 2020; December 31, 2021; December 31, 2022; and December 31, 2023. This approach recognizes that some recipients may experience lagged effects of the pandemic on revenues.

Upon receiving Fiscal Recovery Fund payments, recipients may immediately calculate revenue loss for the period ending December 31, 2020.

3.5. What is the formula for calculating the reduction in revenue?

A reduction in a recipient's General Revenue equals:

$$\text{Max } \{[\text{Base Year Revenue* } (1+\text{Growth Adjustment})^{\left(\frac{n_t}{12}\right)}] - \text{Actual General Revenue}_t \text{ ; } 0\}$$

Where:

Base Year Revenue is General Revenue collected in the most recent full fiscal year prior to the COVD-19 public health emergency.

Growth Adjustment is equal to the greater of 4.1 percent (or 0.041) and the recipient's average annual revenue growth over the three full fiscal years prior to the COVID-19 public health emergency.

n equals the number of months elapsed from the end of the base year to the calculation date.

Actual General Revenue is a recipient's actual general revenue collected during 12-month period ending on each calculation date.

Subscript *t* denotes the calculation date.

3.6. Are recipients expected to demonstrate that reduction in revenue is due to the COVID-19 public health emergency?

In the Interim Final Rule, any diminution in actual revenue calculated using the formula above would be presumed to have been "due to" the COVID-19 public health emergency. This presumption is made for administrative ease and in recognition of the broad-based economic damage that the pandemic has wrought.

3.7. May recipients use pre-pandemic projections as a basis to estimate the reduction in revenue?

No. Treasury is disallowing the use of projections to ensure consistency and comparability across recipients and to streamline verification. However, in estimating the revenue shortfall using the formula above, recipients may incorporate their average annual revenue growth rate in the three full fiscal years prior to the public health emergency.

3.8. Once a recipient has identified a reduction in revenue, are there any restrictions on how recipients use funds up to the amount of the reduction?

The Interim Final Rule gives recipients broad latitude to use funds for the provision of government services to the extent of reduction in revenue. Government services can include, but are not limited to, maintenance of infrastructure or pay-go spending for building new infrastructure, including roads; modernization of cybersecurity, including hardware, software, and protection of critical infrastructure; health services; environmental remediation; school or educational services; and the provision of police, fire, and other public safety services.

However, paying interest or principal on outstanding debt, replenishing rainy day or other reserve funds, or paying settlements or judgments would not be considered provision of a government service, since these uses of funds do not entail direct provision of services to citizens. This restriction on paying interest or principal on any outstanding debt instrument, includes, for example, short-term revenue or tax anticipation notes, or paying fees or issuance costs associated with the issuance of new debt. In addition, the overarching restrictions on all program funds (e.g., restriction on pension deposits, restriction on using funds for non-federal match where barred by regulation or statute) would apply.

3.9. How do I know if a certain type of revenue should be counted for the purpose of computing revenue loss? [5/27]

As discussed in FAQ #3.1, the Interim Final Rule adopts a definition of "General Revenue" that is based on, but not identical, to the Census Bureau's concept of "General Revenue from Own Sources" in the Annual Survey of State and Local Government Finances.

Recipients should refer to the definition of "General Revenue" included in the Interim Final Rule. See 31 CFR 35.3. If a recipient is unsure whether a particular revenue source is included in the Interim Final Rule's definition of "General Revenue," the recipient may consider the classification and instructions used to complete the Census Bureau's Annual Survey.

For example, parking fees would be classified as a Current Charge for the purpose of the Census Bureau's Annual Survey, and the Interim Final Rule's concept of "General Revenue" includes all Current Charges. Therefore, parking fees would be included in the Interim Final Rule's concept of "General Revenue."

The Census Bureau's Government Finance and Employment Classification manual is available here.

3.10. In calculating revenue loss, are recipients required to use audited financials? [6/8]

Where audited data is not available, recipients are not required to obtain audited data. Treasury expects all information submitted to be complete and accurate. See 31 CFR 35.4(c).

3.11. In calculating revenue loss, should recipients use their own data, or Census data? [6/8]

Recipients should use their own data sources to calculate general revenue, and do not need to rely on published revenue data from the Census Bureau. Treasury acknowledges that due to differences in timing, data sources, and definitions, recipients' self-reported general revenue figures may differ somewhat from those published by the Census Bureau.

3.12. Should recipients calculate revenue loss on a cash basis or an accrual basis? [6/8]

Recipients may provide data on a cash, accrual, or modified accrual basis, provided that recipients are consistent in their choice of methodology throughout the covered period and until reporting is no longer required.

3.13. In identifying intergovernmental revenue for the purpose of calculating General Revenue, should recipients exclude all federal funding, or just federal funding related to the COVID-19 response? How should local governments treat federal funds that are passed through states or other entities, or federal funds that are intermingled with other funds? [6/23]

In calculating General Revenue, recipients should exclude all intergovernmental transfers from the federal government. This includes, but is not limited to, federal transfers made via a state to a locality pursuant to the Coronavirus Relief Fund or Fiscal Recovery Funds. To the extent federal funds are passed through states or other entities or intermingled with other funds, recipients should attempt to identify and exclude the federal portion of those funds from the calculation of General Revenue on a best-efforts basis.

3.14. What entities constitute a government for the purpose of calculating revenue loss? [7/14]

In determining whether a particular entity is part of a recipient's government for purposes of measuring a recipient's government revenue, recipients should identify all the entities included in their government and the general revenue attributable to these entities on a best-efforts basis. Recipients are encouraged to consider how their administrative structure is organized under state and local statutes. In cases in which the autonomy of certain authorities, commissions, boards, districts, or other entities is not readily distinguishable from the recipient's government, recipients may adopt the Census Bureau's criteria for judging whether an entity is independent from, or a constituent of, a given government. For an entity to be independent, it generally meets all four of the following conditions:

- The entity is an organized entity and possesses corporate powers, such as perpetual succession, the right to sue and be sued, having a name, the ability to make contracts, and the ability to acquire and dispose of property.
- The entity has governmental character, meaning that it provides public services, or wields authority through a popularly elected governing body or officers appointed by public officials. A high degree of responsibility to the public, demonstrated by public reporting requirements or by accessibility of records for public inspection, also evidences governmental character.
- The entity has substantial fiscal independence, meaning it can determine its budget without review and modification by other governments. For instance, the entity can determine its own taxes, charges, and debt issuance without another government's supervision.
- The entity has substantial administrative independence, meaning it has a popularly elected governing body, or has a governing body representing two or more governments, or, in the event its governing body is appointed by another government, the entity performs functions that are essentially different from those of, and are not subject to specification by, its creating government.

If an entity does not meet all four of these conditions, a recipient may classify the entity as part of the recipient's government and assign the portion of General Revenue that corresponds to the entity.

To further assist recipients in applying the forgoing criteria, recipients may refer to the Census Bureau's *Individual State Descriptions: 2017 Census of Governments* publication, which lists specific entities and classes of entities classified as either independent (defined by Census as "special purpose governments") or constituent (defined by Census as "dependent agencies") on a state-by-state basis. Recipients should note that the Census Bureau's lists are not exhaustive and that Census classifications are based on an analysis of state and local statutes as of 2017 and subject to the Census Bureau's judgement. Though not included in the Census Bureau's publication, state colleges and universities are generally classified as dependent agencies of state governments by the Census Bureau.

If an entity is determined to be part of the recipient's government, the recipient must also determine whether the entity's revenue is covered by the Interim Final Rule's definition of "general revenue." For example, some cash flows may be outside the definition of "general revenue." In addition, note that the definition of general revenue includes Tribal enterprises in the case of Tribal governments. Refer to FAQ 3.1 (and the Appendix) for the components included in General Revenue.

3.15. The Interim Final Rule's definition of General Revenue excludes revenue generated by utilities. Can you please clarify the definition of utility revenue? [7/14]

As noted in FAQs 3.1 and 3.9, the Interim Final Rule adopts a definition of "general revenue" that is based on, but not identical to, the Census Bureau's concept of "General Revenue from Own Sources" in the Annual Survey of State and Local Government Finances. Recipients should refer to the definition of "general revenue" included in the Interim Final Rule. See 31 CFR 35.3. If a recipient is unsure whether a particular revenue source is included in the Interim Final Rule's definition of "general revenue," the recipient may consider the classification and instructions used to complete the Census Bureau's Annual Survey.

According to the Census Bureau's Government Finance and Employment Classification manual, utility revenue is defined as "[g]ross receipts from sale of utility commodities or services to the public or other governments by publicly-owned and controlled utilities." This includes revenue from operations of publicly-owned and controlled water supply systems, electric power systems, gas supply systems, and public mass transit systems (see pages 4-45 and 4-46 of the manual for more detail).

Except for these four types of utilities, revenues from all commercial-type activities of a recipient's government (e.g., airports, educational institutions, lotteries, public hospitals, public housing, parking facilities, port facilities, sewer or solid waste systems, and toll roads and bridges) are covered by the Interim Final Rule's definition of "general revenue." If a recipient is unsure whether a particular entity performing one of these commercial-type activities can be considered part of the recipient's government, please see FAQ 3.14.

4. Eligible Uses – General

4.1. May recipients use funds to replenish a budget stabilization fund, rainy day fund, or similar reserve account?

No. Funds made available to respond to the public health emergency and its negative economic impacts are intended to help meet pandemic response needs and provide immediate stabilization for households and businesses. Contributions to rainy day funds and similar reserves funds would not address these needs or respond to the COVID-19 public health emergency, but would rather be savings for future spending needs. Similarly, funds made available for the provision of governmental services (to the extent of reduction in revenue) are intended to support direct provision of services to citizens. Contributions to rainy day funds are not considered provision of government services, since such expenses do not directly relate to the provision of government services.

4.2. May recipients use funds to invest in infrastructure other than water, sewer, and broadband projects (e.g. roads, public facilities)?

Under 602(c)(1)(C) or 603(c)(1)(C), recipients may use funds for maintenance of infrastructure or pay-go spending for building of new infrastructure as part of the general provision of government services, to the extent of the estimated reduction in revenue due to the public health emergency.

Under 602(c)(1)(A) or 603(c)(1)(A), a general infrastructure project typically would not be considered a response to the public health emergency and its negative economic impacts unless the project responds to a specific pandemic-related public health need (e.g., investments in facilities for the delivery of vaccines) or a specific negative economic impact of the pandemic (e.g., affordable housing in a Qualified Census Tract).

4.3. May recipients use funds to pay interest or principal on outstanding debt?

No. Expenses related to financing, including servicing or redeeming notes, would not address the needs of pandemic response or its negative economic impacts. Such expenses would also not be considered provision of government services, as these financing expenses do not directly provide services or aid to citizens.

This applies to paying interest or principal on any outstanding debt instrument, including, for example, short-term revenue or tax anticipation notes, or paying fees or issuance costs associated with the issuance of new debt.

4.4. May recipients use funds to satisfy nonfederal matching requirements under the Stafford Act? May recipients use funds to satisfy nonfederal matching requirements generally?

Fiscal Recovery Funds are subject to pre-existing limitations in other federal statutes and regulations and may not be used as non-federal match for other Federal programs whose statute or regulations bar the use of Federal funds to meet matching requirements. For example, expenses for the state share of Medicaid are not an eligible use. For information on FEMA programs, please see here.

4.5. Are governments required to submit proposed expenditures to Treasury for approval? [5/27]

No. Recipients are not required to submit planned expenditures for prior approval by Treasury. Recipients are subject to the requirements and guidelines for eligible uses contained in the Interim Final Rule.

4.6. How do I know if a specific use is eligible? [5/27]

Fiscal Recovery Funds must be used in one of the four eligible use categories specified in the American Rescue Plan Act and implemented in the Interim Final Rule:

a) To respond to the public health emergency or its negative economic impacts, including assistance to households, small businesses, and nonprofits, or aid to impacted industries such as tourism, travel, and hospitality;

b) To respond to workers performing essential work during the COVID-19 public health emergency by providing premium pay to eligible workers;

c) For the provision of government services to the extent of the reduction in revenue due to the COVID–19 public health emergency relative to revenues collected in the most recent full fiscal year prior to the emergency; and

d) To make necessary investments in water, sewer, or broadband infrastructure.

Recipients should consult Section II of the Interim Final Rule for additional information on eligible uses. For recipients evaluating potential uses under (a), the Interim Final Rule contains a non-exclusive list of programs or services that may be funded as responding to COVID-19 or the negative economic impacts of the COVID-19 public health emergency, along with considerations for evaluating other potential uses of Fiscal Recovery Funds not explicitly listed. See Section II of the Interim Final Rule for additional discussion.

For recipients evaluating potential uses under (c), the Interim Final Rule gives recipients broad latitude to use funds for the provision of government services to the extent of reduction in revenue. See FAQ #3.8 for additional discussion.

For recipients evaluating potential uses under (b) and (d), see Sections 5 and 6.

4.7. Do restrictions on using Coronavirus State and Local Fiscal Recovery Funds to cover costs incurred beginning on March 3, 2021 apply to costs incurred by the recipient (e.g., a State, local, territorial, or Tribal government) or to costs incurred by households, businesses, and individuals benefiting from assistance provided using Coronavirus State and Local Fiscal Recovery Funds? [6/8]

The Interim Final Rule permits funds to be used to cover costs incurred beginning on March 3, 2021. This limitation applies to costs incurred by the recipient (i.e., the state, local, territorial, or Tribal government receiving funds). However, recipients may use Coronavirus State and Local Fiscal Recovery Funds to provide assistance to households, businesses, and individuals within the eligible use categories described in the Interim

Final Rule for economic harms experienced by those households, businesses, and individuals prior to March 3, 2021. For example,

- Public Health/Negative Economic Impacts – Recipients may use Coronavirus State and Local Fiscal Recovery Funds to provide assistance to households – such as rent, mortgage, or utility assistance – for economic harms experienced or costs incurred by the household prior to March 3, 2021 (e.g., rental arrears from preceding months), provided that the cost of providing assistance to the household was not incurred by the recipient prior to March 3, 2021.
- Premium Pay – Recipients may provide premium pay retrospectively for work performed at any time since the start of the COVID-19 public health emergency. Such premium pay must be "in addition to" wages and remuneration already received and the obligation to provide such pay must not have been incurred by the recipient prior to March 3, 2021.
- Revenue Loss – The Interim Final Rule gives recipients broad latitude to use funds for the provision of government services to the extent of reduction in revenue. The calculation of lost revenue begins with the recipient's revenue in the last full fiscal year prior to the COVID-19 public health emergency and includes the 12-month period ending December 31, 2020. However, use of funds for government services must be forward looking for costs incurred by the recipient after March 3, 2021.
- Investments in Water, Sewer, and Broadband – Recipients may use Coronavirus State and Local Fiscal Recovery Funds to make necessary investments in water, sewer, and broadband. See FAQ Section 6. Recipients may use Coronavirus State and Local Fiscal Recovery Funds to cover costs incurred for eligible projects planned or started prior to March 3, 2021, provided that the project costs covered by the Coronavirus State and Local Fiscal Recovery Funds were incurred after March 3, 2021.

4.8. How can I use CSFRF/CLFRF funds to prevent and respond to crime, and support public safety in my community? [6/23]

Under Treasury's Interim Final Rule, there are many ways in which the State and Local Fiscal Recovery Funds ("Funds") under the American Rescue Plan Act can support communities working to reduce and respond to increased violence due to the pandemic. Among the eligible uses of the Funds are restoring of public sector staff to their pre-pandemic levels and responses to the public health crisis and negative economic impacts resulting from the pandemic. The Interim Final Rule provides several ways for recipients to "respond to" this pandemic-related gun violence, ranging from community violence intervention programs to mental health services to hiring of public safety personnel.

Below are some examples of how Fiscal Recovery Funds can be used to address public safety:

- In all communities, recipients may use resources to rehire police officers and other public servants to restore law enforcement and courts to their pre-pandemic levels.

Additionally, Funds can be used for expenses to address COVID-related court backlogs, including hiring above pre-pandemic levels, as a response to the public health emergency. See FAQ 2.19.

- In communities where an increase in violence or increased difficulty in accessing or providing services to respond to or mitigate the effects of violence, is a result of the pandemic they may use funds to address that harm. This spending may include:

    - Hiring law enforcement officials – even above pre-pandemic levels – or paying overtime where the funds are directly focused on advancing community policing strategies in those communities experiencing an increase in gun violence associated with the pandemic
    - Community Violence Intervention (CVI) programs, including capacity building efforts at CVI programs like funding and training additional intervention workers
    - Additional enforcement efforts to reduce gun violence exacerbated by the pandemic, including prosecuting gun traffickers, dealers, and other parties contributing to the supply of crime guns, as well as collaborative federal, state, and local efforts to identify and address gun trafficking channels
    - Investing in technology and equipment to allow law enforcement to more efficiently and effectively respond to the rise in gun violence resulting from the pandemic

    As discussed in the Interim Final Rule, uses of CSFRF/CLFRF funds that respond to an identified harm must be related and reasonably proportional to the extent and type of harm experienced; uses that bear no relation or are grossly disproportionate to the type or extent of harm experienced would not be eligible uses.

- Recipients may also use funds up to the level of revenue loss for government services, including those outlined above.

Recognizing that the pandemic exacerbated mental health and substance use disorder needs in many communities, eligible public health services include mental health and other behavioral health services, which are a critical component of a holistic public safety approach. This could include:

- Mental health services and substance use disorder services, including for individuals experiencing trauma exacerbated by the pandemic, such as:
    - Community-based mental health and substance use disorder programs that deliver evidence-based psychotherapy, crisis support services, medications for opioid use disorder, and/or recovery support
    - School-based social-emotional support and other mental health services
- Referrals to trauma recovery services for crime victims.

Recipients also may use Funds to respond to the negative economic impacts of the public health emergency, including:

- Assistance programs to households or populations facing negative economic impacts of the public health emergency, including:

  - Assistance to support economic security, including for the victims of crime;
  - Housing assistance, including rent, utilities, and relocation assistance;
  - Assistance with food, including Summer EBT and nutrition programs; and
  - Employment or job training services to address negative economic or public health impacts experienced due to a worker's occupation or level of training.

- Assistance to unemployed workers, including:
  - Subsidized jobs, including for young people. Summer youth employment programs directly address the negative economic impacts of the pandemic on young people and their families and communities;
  - Programs that provide paid training and/or work experience targeted primarily to (1) formerly incarcerated individuals, and/or (2) communities experiencing high levels of violence exacerbated by the pandemic;
  - Programs that provide workforce readiness training, apprenticeship or pre-apprenticeship opportunities, skills development, placement services, and/or coaching and mentoring; and
  - Associated wraparound services, including for housing, health care, and food.

Recognizing the disproportionate impact of the pandemic on certain communities, a broader range of services are eligible in those communities than would otherwise be available in communities not experiencing a pandemic-related increase in crime or gun violence. These eligible uses aim to address the pandemic's exacerbation of public health and economic disparities and include services to address health and educational disparities, support neighborhoods and affordable housing, and promote healthy childhood environments. The Interim Final Rule provides a non-exhaustive list of eligible services in these categories.

These services automatically qualify as eligible uses when provided in Qualified Census Tracts (QCTs), low-income areas designated by HUD; to families in QCTs; or by Tribal governments. Outside of these areas, recipient governments can also identify and serve households, populations, and geographic areas disproportionately impacted by the pandemic.

Services under this category could include:

- Programs or services that address or mitigate the impacts of the COVID-19 public health emergency on education, childhood health and welfare, including:
  - Summer education and enrichment programs in these communities, which include many communities currently struggling with high levels of violence;
  - Programs that address learning loss and keep students productively engaged;
  - Enhanced services for foster youths and home visiting programs; and
  - Summer camps and recreation.

- Programs or services that provide or facilitate access to health and social services and address health disparities exacerbated by the pandemic. This includes Community Violence Intervention (CVI) programs, such as:
  - Evidence-based practices like focused deterrence, street outreach, violence interrupters, and hospital-based violence intervention models, complete with

wraparound services such as behavioral therapy, trauma recovery, job training, education, housing and relocation services, and financial assistance; and,
- Capacity-building efforts at CVI programs like funding more intervention workers; increasing their pay; providing training and professional development for intervention workers; and hiring and training workers to administer the programs.

Please refer to Treasury's Interim Final Rule for additional information.

4.9. May recipients pool funds for regional projects? [7/14]

Yes, provided that the project is itself an eligible use of funds and that recipients can track the use of funds in line with the reporting and compliance requirements of the CSFRF/CLFRF. In general, when pooling funds for regional projects, recipients may expend funds directly on the project or transfer funds to another government that is undertaking the project on behalf of multiple recipients. To the extent recipients undertake regional projects via transfer to another government, recipients would need to comply with the rules on transfers specified in the Interim Final Rule, Section V. A recipient may transfer funds to a government outside its boundaries (e.g., county transfers to a neighboring county), provided that the recipient can document that its jurisdiction receives a benefit proportionate to the amount contributed.

4.10. May recipients fund a project with both ARP funds and other sources of funding (e.g., blending, braiding, or other pairing funding sources), including in conjunction with financing provided through a debt issuance? [7/14]

Cost sharing or matching funds are not required under CSFRF/CLFRF. Funds may be used in conjunction with other funding sources, provided that the costs are eligible costs under each source program and are compliant with all other related statutory and regulatory requirements and policies. The recipient must comply with applicable reporting requirements for all sources of funds supporting the CSFRF/CLFRF projects, and with any requirements and restrictions on the use of funds from the supplemental funding sources and the CSFRF/CLFRF program. Specifically,

- All funds provided under the CSFRF/CLFRF program must be used for projects, investments, or services that are eligible under the CSFRF/CLFRF statute, Treasury's Interim Final Rule, and guidance. See 31 CFR 35.6-8; FAQ 4.6. CSFRF/CLFRF funds may not be used to fund an activity that is not, in its entirety, an eligible use under the CSFRF/CLFRF statute, Treasury's Interim Final Rule, and guidance. For example,
    - CSFRF/CLFRF funds may be used in conjunction with other sources of funds to make an investment in water infrastructure, which is eligible under the CSLFRF statute, and Treasury's Interim Final Rule.
    - CSFRF/CLFRF funds could not be used to fund the entirety of a water infrastructure project that was partially, although not entirely, an eligible use under Treasury's Interim Final Rule. However, the recipient could use CSFRF/CLFRF funds only for a smaller component project that does

constitute an eligible use, while using other funds for the remaining portions of the larger planned water infrastructure project that do not constitute an eligible use. In this case, the "project" under this program would be only the eligible use component of the larger project.

- In addition, because CSFRF/CLFRF funds must be obligated by December 31, 2024, and expended by December 31, 2026, recipients must be able to, at a minimum, determine and report to Treasury on the amount of CSFRF/CLFRF funds obligated and expended and when such funds were obligated and expended.

4.11. May Coronavirus State and Local Fiscal Recovery Funds be used to make loans or other extensions of credit ("loans"), including loans to small businesses and loans to finance necessary investments in water, sewer, and broadband infrastructure? [7/14]

Yes. Coronavirus State and Local Fiscal Recovery Funds ("Funds") may be used to make loans, provided that the loan is an eligible use and the cost of the loan is tracked and reported in accordance with the points below. See 31 CFR 35.6. For example, a recipient may use Coronavirus State and Local Fiscal Recovery Funds to make loans to small businesses. See 31 CFR 35.6(b)(6). In addition, a recipient may use Funds to finance a necessary investment in water, sewer or broadband, as described in the Interim Final Rule. See 31 CFR 35.6(e).

Funds must be used to cover "costs incurred" by the recipient between March 3, 2021, and December 31, 2024, and Funds must be expended by December 31, 2026. See Section III.D of the Interim Final Rule; 31 CFR 35.5. Accordingly, recipients must be able to determine the amount of Funds used to make a loan.

- For loans that mature or are forgiven on or before December 31, 2026, the recipient must account for the use of funds on a cash flow basis, consistent with the approach to loans taken in the Coronavirus Relief Fund.
    - Recipients may use Fiscal Recovery Funds to fund the principal of the loan and in that case must track repayment of principal and interest (i.e., "program income," as defined under 2 CFR 200).
    - When the loan is made, recipients must report the principal of the loan as an expense.
    - Repayment of principal may be re-used only for eligible uses, and subject to restrictions on timing of use of funds. Interest payments received prior to the end of the period of performance will be considered an addition to the total award and may be used for any purpose that is an eligible use of funds under the statute and IFR. Recipients are not subject to restrictions under 2 CFR 200.307(e)(1) with respect to such payments.

- For loans with maturities longer than December 31, 2026, the recipient may use Fiscal Recovery Funds for only the projected cost of the loan. Recipients may estimate the subsidy cost of the loan, which equals the expected cash flows associated with the loan discounted at the recipient's cost of funding. A recipient's cost of funding can be determined based on the interest rates of securities with a similar maturity to the cash flow being discounted that were either (i) recently issued by the recipient or (ii) recently issued by a unit of state, local, or Tribal government similar to the recipient. Recipients that have adopted the Current Expected Credit Loss (CECL) standard may also treat the cost of the loan as equal to the CECL-based expected credit losses over the life of the loan. Recipients may measure projected losses either once, at the time the loan is extended, or annually over the covered period.

Under either approach for measuring the amount of funds used to make loans with maturities longer than December 31, 2026, recipients would not be subject to restrictions under 2 CFR 200.307(e)(1) and need not separately track repayment of principal or interest.

Any contribution of Fiscal Recovery Funds to a revolving loan fund must follow the approach described above for loans with maturities longer than December 31, 2026. In other words, a recipient could contribute Fiscal Recovery Funds to a revolving loan fund, provided that the revolving loan fund makes loans that are eligible uses and the Fiscal Recovery Funds contributed represent the projected cost of loans made over the life of the revolving loan fund.

4.12. May funds be used for outreach to increase uptake of federal assistance like the Child Tax Credit or federal programs like SNAP? [7/14]

Yes. Eligible uses to address negative economic impacts include work "to improve efficacy of programs addressing negative economic impacts, including through use of data analysis, targeted consumer outreach, improvements to data or technology infrastructure, and impact evaluations." See 31 CFR 35.6(b)(10). Of note, per the CSFRF/CLFRF Reporting Guidance, allowable use of funds for evaluations may also include other types of program evaluations focused on program improvement and evidence building. In addition, recipients may use funds to facilitate access to health and social services in populations and communities disproportionately impacted by the COVID-19 pandemic, including benefits navigators or marketing efforts to increase consumer uptake of federal tax credits, benefits, or assistance programs that respond to negative economic impacts of the pandemic. See 31 CFR 35.6(b)(12).

5. Eligible Uses – Premium Pay

5.1. What criteria should recipients use in identifying essential workers to receive premium pay?

Essential workers are those in critical infrastructure sectors who regularly perform in-person work, interact with others at work, or physically handle items handled by others.

Critical infrastructure sectors include healthcare, education and childcare, transportation, sanitation, grocery and food production, and public health and safety, among others, as provided in the Interim Final Rule. Governments receiving Fiscal Recovery Funds have the discretion to add additional sectors to this list, so long as the sectors are considered critical to protect the health and well-being of residents.

The Interim Final Rule emphasizes the need for recipients to prioritize premium pay for lower income workers. Premium pay that would increase a worker's total pay above 150% of the greater of the state or county average annual wage requires specific justification for how it responds to the needs of these workers.

5.2. What criteria should recipients use in identifying third-party employers to receive grants for the purpose of providing premium pay to essential workers?

Any third-party employers of essential workers are eligible. Third-party contractors who employ essential workers in eligible sectors are also eligible for grants to provide premium pay. Selection of third-party employers and contractors who receive grants is at the discretion of recipients.

To ensure any grants respond to the needs of essential workers and are made in a fair and transparent manner, the rule imposes some additional reporting requirements for grants to third-party employers, including the public disclosure of grants provided.

5.3. May recipients provide premium pay retroactively for work already performed?

Yes. Treasury encourages recipients to consider providing premium pay retroactively for work performed during the pandemic, recognizing that many essential workers have not yet received additional compensation for their service during the pandemic.

6. Eligible Uses – Water, Sewer, and Broadband Infrastructure

6.1. What types of water and sewer projects are eligible uses of funds?

The Interim Final Rule generally aligns eligible uses of the Funds with the wide range of types or categories of projects that would be eligible to receive financial assistance through the Environmental Protection Agency's Clean Water State Revolving Fund (CWSRF) or Drinking Water State Revolving Fund (DWSRF).

Under the DWSRF, categories of eligible projects include: treatment, transmission and distribution (including lead service line replacement), source rehabilitation and decontamination, storage, consolidation, and new systems development.

Under the CWSRF, categories of eligible projects include: construction of publicly-owned treatment works, nonpoint source pollution management, national estuary program projects, decentralized wastewater treatment systems, stormwater systems, water conservation, efficiency, and reuse measures, watershed pilot projects, energy efficiency measures for publicly-owned treatment works, water reuse projects, security measures at publicly-owned treatment works, and technical assistance to ensure compliance with the Clean Water Act.

As mentioned in the Interim Final Rule, eligible projects under the DWSRF and CWSRF support efforts to address climate change, as well as to meet cybersecurity needs to protect water and sewer infrastructure. Given the lifelong impacts of lead exposure for children, and the widespread nature of lead service lines, Treasury also encourages recipients to consider projects to replace lead service lines.

6.2. May construction on eligible water, sewer, or broadband infrastructure projects continue past December 31, 2024, assuming funds have been obligated prior to that date?

Yes. Treasury is interpreting the requirement that costs be incurred by December 31, 2024 to only require that recipients have obligated the funds by such date. The period of performance will run until December 31, 2026, which will provide recipients a reasonable amount of time to complete projects funded with Fiscal Recovery Funds.

6.3. May recipients use funds as a non-federal match for the Clean Water State Revolving Fund (CWSRF) or Drinking Water State Revolving Fund (DWSRF)?

Recipients may not use funds as a state match for the CWSRF and DWSRF due to prohibitions in utilizing federal funds as a state match in the authorizing statutes and regulations of the CWSRF and DWSRF.

6.4. Does the National Environmental Policy Act (NEPA) apply to eligible infrastructure projects?

NEPA does not apply to Treasury's administration of the Funds. Projects supported with payments from the Funds may still be subject to NEPA review if they are also funded by other federal financial assistance programs.

6.5. What types of broadband projects are eligible?

The Interim Final Rule requires eligible projects to reliably deliver minimum speeds of 100 Mbps download and 100 Mbps upload. In cases where it is impracticable due to geography, topography, or financial cost to meet those standards, projects must reliably deliver at least 100 Mbps download speed, at least 20 Mbps upload speed, and be scalable to a minimum of 100 Mbps download speed and 100 Mbps upload speed.

Projects must also be designed to serve unserved or underserved households and businesses, defined as those that are not currently served by a wireline connection that reliably delivers at least 25 Mbps download speed and 3 Mbps of upload speed.

6.6. For broadband investments, may recipients use funds for related programs such as cybersecurity or digital literacy training?

Yes. Recipients may use funds to provide assistance to households facing negative economic impacts due to Covid-19, including digital literacy training and other programs that promote access to the Internet. Recipients may also use funds for modernization of cybersecurity, including hardware, software, and protection of critical infrastructure, as part of provision of government services up to the amount of revenue lost due to the public health emergency.

6.7. How do I know if a water, sewer, or broadband project is an eligible use of funds? Do I need pre-approval? [6/8]

Recipients do not need approval from Treasury to determine whether an investment in a water, sewer, or broadband project is eligible under CSFRF/CLFRF. Each recipient should review the Interim Final Rule (IFR), along with the preamble to the Interim Final Rule, in order to make its own assessment of whether its intended project meets the eligibility criteria in the IFR. A recipient that makes its own determination that a project meets the eligibility criteria as outlined in the IFR may pursue the project as a CSFRF/CLFRF project without pre-approval from Treasury. Local government recipients similarly do not need state approval to determine that a project is eligible under CSFRF/CLFRF. However, recipients should be cognizant of other federal or state laws or regulations that may apply to construction projects independent of CSFRF/CLFRF funding conditions and that may require pre-approval.

For water and sewer projects, the IFR refers to the EPA Drinking Water and Clean Water State Revolving Funds (SRFs) for the categories of projects and activities that are eligible for funding. Recipients should look at the relevant federal statutes, regulations, and guidance issued by the EPA to determine whether a water or sewer project is eligible. Of note, the IFR does not incorporate any other requirements contained in the federal statutes governing the SRFs or any conditions or requirements that individual states may place on their use of SRFs.

6.8. For broadband infrastructure investments, what does the requirement that infrastructure "be designed to" provide service to unserved or underserved households and businesses mean? [6/17]

Designing infrastructure investments to provide service to unserved or underserved households or businesses means prioritizing deployment of infrastructure that will bring service to households or businesses that are not currently serviced by a wireline connection that reliably delivers at least 25 Mbps download speed and 3 Mbps of upload speed. To meet this requirement, states and localities should use funds to deploy broadband infrastructure projects whose objective is to provide service to unserved or underserved households or businesses. These unserved or underserved households or businesses do not need to be the only ones in the service area funded by the project.

6.9. For broadband infrastructure to provide service to "unserved or underserved households or businesses," must every house or business in the service area be unserved or underserved? [6/17]

No. It suffices that an objective of the project is to provide service to unserved or underserved households or businesses. Doing so may involve a holistic approach that provides service to a wider area in order, for example, to make the ongoing service of unserved or underserved households or businesses within the service area economical. Unserved or underserved households or businesses need not be the *only* households or businesses in the service area receiving funds.

6.10. May recipients use payments from the Funds for "middle mile" broadband projects? [6/17]

Yes. Under the Interim Final Rule, recipients may use payments from the Funds for "middle-mile projects," but Treasury encourages recipients to focus on projects that will achieve last-mile connections—whether by focusing on funding last-mile projects or by ensuring that funded middle-mile projects have potential or partnered last-mile networks that could or would leverage the middle-mile network.

6.11. For broadband infrastructure investments, what does the requirement to "reliably" meet or exceed a broadband speed threshold mean? [6/17]

In the Interim Final Rule, the term "reliably" is used in two places: to identify areas that are eligible to be the subject of broadband infrastructure investments and to identify expectations for acceptable service levels for broadband investments funded by the Coronavirus State and Local Fiscal Recovery Funds. In particular:

- The IFR defines "unserved or underserved households or businesses" to mean one or more households or businesses that are not currently served by a wireline connection that reliably delivers at least 25 Mbps download speeds and 3 Mbps of upload speeds.

- The IFR provides that a recipient may use Coronavirus State and Local Fiscal Recovery Funds to make investments in broadband infrastructure that are designed to provide service to unserved or underserved households or businesses and that are designed to, upon completion: (i) reliably meet or exceed symmetrical 100 Mbps download speed and upload speeds; or (ii) in limited cases, reliably meet or exceed 100 Mbps download speed and between 20 Mbps and 100 Mbps upload speed and be scalable to a minimum of 100 Mbps download and upload speeds.

The use of "reliably" in the IFR provides recipients with significant discretion to assess whether the households and businesses in the area to be served by a project have access to wireline broadband service that can actually and consistently meet the specified thresholds of at least 25Mbps/3Mbps—i.e., to consider the actual experience of current wireline broadband customers that subscribe to services at or above the 25 Mbps/3 Mbps threshold. Whether there is a provider serving the area that advertises or otherwise claims to offer speeds that meet the 25 Mbps download and 3 Mbps upload speed thresholds is not dispositive.

When making these assessments, recipients may choose to consider any available data, including but not limited to documentation of existing service performance, federal and/or state-collected broadband data, user speed test results, interviews with residents and business owners, and any other information they deem relevant. In evaluating such data, recipients may take into account a variety of factors, including whether users actually receive service at or above the speed thresholds at all hours of the day, whether factors other than speed such as latency or jitter, or deterioration of the existing connections make the user experience unreliable, and whether the existing service is being delivered by legacy technologies, such as copper telephone lines (typically using Digital Subscriber Line technology) or early versions of cable system technology (DOCSIS 2.0 or earlier).

The IFR also provides recipients with significant discretion as to how they will assess whether the project itself has been designed to provide households and businesses with broadband services that meet, or even exceed, the speed thresholds provided in the rule.

6.12. May recipients use Funds for pre-project development for eligible water, sewer, and broadband projects? [6/23]

Yes. To determine whether Funds can be used on pre-project development for an eligible water or sewer project, recipients should consult whether the pre-project development use or cost is eligible under the Drinking Water and Clean Water State Revolving Funds (CWSRF and DWSRF, respectively). Generally, the CWSRF and DWSRF often allow for pre-project development costs that are tied to an eligible project, as well as those that are reasonably expected to lead to a project. For example, the DWSRF allows for planning and evaluations uses, as well as numerous pre-project development costs, including costs associated with obtaining project authorization, planning and design, and project start-up like training and warranty for equipment. Likewise, the CWSRF allows for broad pre-project development, including planning and assessment activities, such as cost and effectiveness analyses, water/energy audits and conservation plans, and capital improvement plans.

Similarly, pre-project development uses and costs for broadband projects should be tied to an eligible broadband project or reasonably expected to lead to such a project. For example, pre-project costs associated with planning and engineering for an eligible broadband infrastructure build-out is considered an eligible use of funds, as well as technical assistance and evaluations that would reasonably be expected to lead to commencement of an eligible project (e.g., broadband mapping for the purposes of finding an eligible area for investment).

All funds must be obligated within the statutory period between March 3, 2021 and December 31, 2024, and expended to cover such obligations by December 31, 2026.

6.13. May State and Local Fiscal Recovery Funds be used to support energy or electrification infrastructure that would be used to power new water treatment plants and wastewater systems? [7/14]

The EPA's Overview of Clean Water State Revolving Fund Eligibilities describes eligible energy-related projects. This includes a "[p]ro rata share of capital costs of offsite clean energy facilities that provide power to a treatment works." Thus, State and Local Fiscal Recovery Funds may be used to finance the generation and delivery of clean power to a wastewater system or a water treatment plant on a pro-rata basis. If the wastewater system or water treatment plant is the sole user of the clean energy, the full cost would be considered an eligible use of funds. If the clean energy provider provides power to other entities, only the proportionate share used by the water treatment plant or wastewater system would be an eligible use of State and Local Fiscal Recovery Funds.

6.14. How should states and local governments assess whether a stormwater management project, such as a culvert replacement, is an eligible project for State and Local Fiscal Recovery Funds? [7/14]

FAQ 6.7 describes the overall approach that recipients may take to evaluate the eligibility of water or sewer projects. For stormwater management projects specifically, as noted in the EPA's Overview of Clean Water State Revolving Fund Eligibilities, "Stormwater projects must have a water quality benefit." Thus, to be eligible under CSFRF/CLFRF, stormwater management projects should be designed to incorporate water quality benefits consistent with the goals of the Clean Water Act. Summary of the Clean Water Act.

6.15. May recipients use Funds for road repairs and upgrades that occur in connection with an eligible water or sewer project? [7/14]

Yes, recipients may use State and Local Fiscal Recovery Funds for road repairs and upgrades directly related to an eligible water or sewer project. For example, a recipient could use Funds to repair or re-pave a road following eligible sewer repair work beneath it. However, use of Funds for general infrastructure projects is subject to the limitations described in FAQ 4.2. Water and sewer infrastructure projects are often a single component of a broader transportation infrastructure project, for example, the implementation of stormwater infrastructure to meet Clean Water Act established water quality standards. In this example, the components of the infrastructure project that interact directly with the stormwater infrastructure project may be funded by Fiscal Recovery Funds.

6.16. May Funds be used to build or upgrade broadband connections to schools or libraries? [7/14]

As outlined in the IFR, recipients may use Fiscal Recovery Funds to invest in broadband infrastructure that, wherever it is practicable to do so, is designed to deliver service that reliably meets or exceeds symmetrical upload and download speeds of 100 Mbps to households or businesses that are not currently serviced by a wireline connection that reliably delivers at least 25 Mbps download speed and 3 Mbps of upload speed. Treasury interprets “businesses” in this context broadly to include non-residential users of broadband, including private businesses and institutions that serve the public, such as schools, libraries, healthcare facilities, and public safety organizations.

6.17. Are eligible infrastructure projects subject to the Davis-Bacon Act? [7/14]

The Davis-Bacon Act requirements (prevailing wage rates) do not apply to projects funded solely with award funds from the CSFRF/CLFRF program, except for CSFRF/CLFRF-funded construction projects undertaken by the District of Columbia. The Davis-Bacon Act specifically applies to the District of Columbia when it uses federal funds (CSFRF/CLFRF funds or otherwise) to enter into contracts over $2,000 for the construction, alteration, or repair (including painting and decorating) of public buildings or public works. Recipients may be otherwise subject to the requirements of the Davis-Bacon Act, when CSFRF/CLFRF award funds are used on a construction project in conjunction with funds from another federal program that requires enforcement of the Davis-Bacon Act. Additionally, corollary state prevailing-wage-in-construction laws (commonly known as “baby Davis-Bacon Acts”) may apply to projects. Please refer to FAQ 4.10 concerning projects funded with both CSFRF/CLFRF funds and other sources of funding.

Treasury has indicated in its Interim Final Rule that it is important that necessary investments in water, sewer, or broadband infrastructure be carried out in ways that produce high-quality infrastructure, avert disruptive and costly delays, and promote efficiency. Treasury encourages recipients to ensure that water, sewer, and broadband projects use strong labor standards, including project labor agreements and community benefits agreements that offer wages at or above the prevailing rate and include local hire provisions, not only to promote effective and efficient delivery of high-quality infrastructure projects, but also to support the economic recovery through strong employment opportunities for workers. Using these practices in construction projects may help to ensure a reliable supply of skilled labor that would minimize disruptions, such as those associated with labor disputes or workplace injuries.
Treasury has also indicated in its reporting guidance that recipients will need to provide documentation of wages and labor standards for infrastructure projects over $10 million, and that that these requirements can be met with certifications that the project is in compliance with the Davis-Bacon Act (or related state laws, commonly known as “baby Davis-Bacon Acts”) and subject to a project labor agreement. Please refer to the Reporting and Compliance Guidance, page 21, for more detailed information on the reporting requirement.

7. Non-Entitlement Units (NEUs)

Answers to frequently asked questions on distribution of funds to NEUs can be found in this FAQ supplement, which is regularly updated.

8. Ineligible Uses

8.1. What is meant by a pension "deposit"? Can governments use funds for routine pension contributions for employees whose payroll and covered benefits are eligible expenses?

Treasury interprets "deposit" in this context to refer to an extraordinary payment into a pension fund for the purpose of reducing an accrued, unfunded liability. More specifically, the interim final rule does not permit this assistance to be used to make a payment into a pension fund if both: (1) the payment reduces a liability incurred prior to the start of the COVID-19 public health emergency, and (2) the payment occurs outside the recipient's regular timing for making such payments.

Under this interpretation, a "deposit" is distinct from a "payroll contribution," which occurs when employers make payments into pension funds on regular intervals, with contribution amounts based on a pre-determined percentage of employees' wages and salaries. In general, if an employee's wages and salaries are an eligible use of Fiscal Recovery Funds, recipients may treat the employee's covered benefits as an eligible use of Fiscal Recovery Funds.

8.2. May recipients use Fiscal Recovery Funds to fund Other Post-Employment Benefits (OPEB)? [6/8]

OPEB refers to benefits other than pensions (see, e.g., Governmental Accounting Standards Board, "Other Post-Employment Benefits"). Treasury has determined that Sections 602(c)(2)(B) and 603(c)(2), which refer only to pensions, do not prohibit CSFRF/CLFRF recipients from funding OPEB. Recipients of either the CSFRF/CLFRF may use funds for eligible uses, and a recipient seeking to use CSFRF/CLFRF funds for OPEB contributions would need to justify those contributions under one of the four eligible use categories.

9. Reporting

On June 17, 2021, Treasury released Guidance on Recipient Compliance and Reporting Responsibilities for the Coronavirus State and Local Fiscal Recovery Funds. Recipients should consult this guidance for additional detail and clarification on recipients' compliance and reporting responsibilities. A users' guide will be provided with additional information on how and where to submit required reports.

9.1. What records must be kept by governments receiving funds?

Financial records and supporting documents related to the award must be retained for a period of five years after all funds have been expended or returned to Treasury, whichever is later. This includes those which demonstrate the award funds were used for eligible purposes in accordance with the ARPA, Treasury's regulations implementing those sections, and Treasury's guidance on eligible uses of funds.

9.2. What reporting will be required, and when will the first report be due?

Recipients will be required to submit an interim report, quarterly project and expenditure reports, and annual Recovery Plan Performance Reports as specified below, regarding their utilization of Coronavirus State and Local Fiscal Recovery Funds.

Interim reports: States (defined to include the District of Columbia), territories, metropolitan cities, counties, and Tribal governments will be required to submit one interim report. The interim report will include a recipient's expenditures by category at the summary level and for states, information related to distributions to non-entitlement units of local government must also be included in the interim report. The interim report will cover activity from the date of award to July 31, 2021 and must be submitted to Treasury by August 31, 2021. Non-entitlement units of local government are not required to submit an interim report.

Quarterly Project and Expenditure reports: State (defined to include the District of Columbia), territorial, metropolitan city, county, and Tribal governments will be required to submit quarterly project and expenditure reports. This report will include financial data, information on contracts and subawards over $50,000, types of projects funded, and other information regarding a recipient's utilization of award funds. Reports will be required quarterly with the exception of non-entitlement units, which will report annually. An interim report is due on August 31, 2021. The reports will include the same general data as those submitted by recipients of the Coronavirus Relief Fund, with some modifications to expenditure categories and the addition of data elements related to specific eligible uses. The initial quarterly Project and Expenditure report will cover two calendar quarters from the date of award to September 30, 2021 and must be submitted to Treasury by October 31, 2021. The subsequent quarterly reports will cover one calendar quarter and must be submitted to Treasury within 30 days after the end of each calendar quarter.

Non-entitlement units of local government will be required to submit the project and expenditure report annually. The initial annual Project and Expenditure report for non-entitlement units of local government will cover activity from the date of award to September 30, 2021 and must be submitted to Treasury by October 31, 2021. The subsequent annual reports must be submitted to Treasury by October 31 each year.

Recovery Plan Performance Reports: States (defined to include the District of Columbia), territories, metropolitan cities, and counties with a population that exceeds 250,000 residents will also be required to submit an annual Recovery Plan Performance Report to Treasury. This report will include descriptions of the projects funded and information on the performance indicators and objectives of each award, helping local residents understand how their governments are using the substantial resources provided by Coronavirus State and Local Fiscal Recovery Funds program. The initial Recovery Plan Performance Report will cover activity from date of award to July 31, 2021 and must be submitted to Treasury by August 31, 2021. Thereafter, the Recovery Plan Performance Reports will cover a 12-month period and recipients will be required to submit the report to Treasury within 30 days after the end of the 12-month period. The second Recovery Plan Performance Report will cover the period from July 1, 2021 to June 30, 2022 and must be submitted to Treasury by July 31, 2022. Each annual Recovery Plan Performance Report must be posted on the public-facing website of the recipient. Local governments with fewer than 250,000 residents, Tribal governments, and non-entitlement units of local government are not required to develop a Recovery Plan Performance Report.

Please see the Guidance on Recipient Compliance and Reporting Responsibilities for more information.

9.3. What provisions of the Uniform Guidance for grants apply to these funds? Will the Single Audit requirements apply?

Most of the provisions of the Uniform Guidance (2 CFR Part 200) apply to this program, including the Cost Principles and Single Audit Act requirements. Recipients should refer to the Assistance Listing for detail on the specific provisions of the Uniform Guidance that do not apply to this program. The Assistance Listing will be available on beta.SAM.gov.

9.4. Once a recipient has identified a reduction in revenue, how will Treasury track use of funds for the provision of government services? [6/8]

The ARPA establishes four categories of eligible uses and further restrictions on the use of funds to ensure that Fiscal Recovery Funds are used within the four eligible use categories. The Interim Final Rule implements these restrictions, including the scope of the eligible use categories and further restrictions on tax cuts and deposits into pensions. Reporting requirements will align with this structure.

Consistent with the broad latitude provided to recipients to use funds for government services to the extent of the reduction in revenue, recipients will be required to submit a description of services provided. As discussed in IFR, these services can include a broad range of services but may not be used directly for pension deposits, contributions to reserve funds, or debt service. Recipients may use sources of funding other than Fiscal Recovery Funds to make deposits to pension funds, contribute to reserve funds, and pay debt service, including during the period of performance for the Fiscal Recovery Fund award.

For recipients using Fiscal Recovery Funds to provide government services to the extent of reduction in revenue, the description of government services reported to Treasury may be narrative or in another form, and recipients are encouraged to report based on their existing budget processes and to minimize administrative burden. For example, a recipient with $100 in revenue replacement funds available could indicate that $50 were used for personnel costs and $50 were used for pay-go building of sidewalk infrastructure.

In addition to describing the government services provided to the extent of reduction in revenue, all recipients will also be required to indicate that Fiscal Recovery Funds are not used directly to make a deposit in a pension fund. Further, recipients subject to the tax offset provision will be required to provide information necessary to implement the Interim Final Rule, as described in the Interim Final Rule. Treasury does not anticipate requiring other types of reporting or recordkeeping on spending in pensions, debt service, or contributions to reserve funds.

These requirements are further detailed in the guidance on reporting requirements for the Fiscal Recovery Funds available here.

9.5. What is the Assistance Listing and Catalog of Federal Domestic Assistance (CFDA) number for the program? [6/8]

The Assistance Listing for the Coronavirus State and Local Fiscal Recovery Funds (CSLFRF) was published May 28, 2021 on SAM.gov. This includes the final CFDA Number for the program, 21.027.

The assistance listing includes helpful information including program purpose, statutory authority, eligibility requirements, and compliance requirements for recipients. The CFDA number is the unique 5-digit code for each type of federal assistance, and can be used to search for program information, including funding opportunities, spending on usaspending.gov, or audit results through the Federal Audit Clearinghouse.

To expedite payments and meet statutory timelines, Treasury issued initial payments under an existing CFDA number. If you have already received funds or captured the initial CFDA number in your records, please update your systems and reporting to reflect the final CFDA number 21.027. **Recipients must use the final CFDA number for all financial accounting, audits, subawards, and associated program reporting requirements.**

To ensure public trust, Treasury expects all recipients to serve as strong stewards of these funds. This includes ensuring funds are used for intended purposes and recipients have in place effective financial management, internal controls, and reporting for transparency and accountability.

Please see Treasury's Interim Final Rule and the Guidance on Recipient Compliance and Reporting Responsibilities for more information.

10. Miscellaneous

10.1. May governments retain assets purchased with Fiscal Recovery Funds? If so, what rules apply to the proceeds of disposition or sale of such assets?

Yes, if the purchase of the asset was consistent with the limitations on the eligible use of funds. If such assets are disposed of prior to December 31, 2024, the proceeds would be subject to the restrictions on the eligible use of payments.

10.2. Can recipients use funds for administrative purposes?

Recipients may use funds to cover the portion of payroll and benefits of employees corresponding to time spent on administrative work necessary due to the COVID–19 public health emergency and its negative economic impacts. This includes, but is not limited to, costs related to disbursing payments of Fiscal Recovery Funds and managing new grant programs established using Fiscal Recovery Funds.

10.3. Are recipients required to remit interest earned on CSFRF/CLFRF payments made by Treasury? [5/27, updated 7/14]

No. CSFRF/CLFRF payments made by Treasury to states, territories, and the District of Columbia are not subject to the requirement of the Cash Management Improvement Act and Treasury's implementing regulations at 31 CFR part 205 to remit interest to Treasury. CSFRF/CLFRF payments made by Treasury to local governments and Tribes are not subject to the requirement of 2 CFR 200.305(b)(8)–(9) to maintain balances in an interest-bearing account and remit payments to Treasury. Moreover, interest earned on CSFRF/CLFRF payments is not subject to program restrictions. Finally, States may retain interest on payments made by Treasury to the State for distribution to NEUs that is earned before funds are distributed to NEUs, provided that the State adheres to the statutory requirements and Treasury's guidance regarding the distribution of funds to NEUs. Such interest is also not subject to program restrictions.

Among other things, States and other recipients may use earned income to defray the administrative expenses of the program, including with respect to NEUs.

10.4. Is there a deadline to apply for funds? [5/27]

The Interim Final Rule requires that costs be incurred by December 31, 2024. Direct recipients are encouraged to apply as soon as possible. For direct recipients other than Tribal governments, there is not a specific application deadline.

Tribal governments do have deadlines to complete the application process and should visit www.treasury.gov/SLFRPTribal for guidance on applicable deadlines.

Non-entitlement units of local government should contact their state government for information on applicable deadlines.

10.5. May recipients use funds to cover the costs of consultants to assist with managing and administering the funds? [6/8]

Yes. Recipients may use funds for administering the CSFRF/CLFRF program, including costs of consultants to support effective management and oversight, including consultation for ensuring compliance with legal, regulatory, and other requirements.

11. Operations

11.1. How do I know if my entity is eligible?

The Coronavirus State and Local Fiscal Recovery Funds American Rescue Plan Act of 2021 set forth the jurisdictions eligible to receive funds under the program, which are:

- States and the District of Columbia
- Territories
- Tribal governments
- Counties
- Metropolitan cities (typically, but not always, those with populations over 50,000)
- Non-entitlement units of local government, or smaller local governments (typically, but not always, those with populations under 50,000)

11.2. How does an eligible entity request payment?

Eligible entities (other than non-entitlement units) must submit their information to the Treasury Submission Portal. Please visit the **Coronavirus State and Local Fiscal Recovery Fund website** for more information on the submission process.

11.3. I cannot log into the Treasury Submission Portal or am having trouble navigating it. Who can help me?

If you have questions about the Treasury Submission Portal or for technical support, please email covidreliefitsupport@treasury.gov.

11.4. What do I need to do to receive my payment?

All eligible payees are required to have a DUNS Number previously issued by Dun & Bradstreet (https://www.dnb.com/).

All eligible payees are also required to have an active registration with the System for Award Management (SAM) (https://www.sam.gov).

And eligible payees must have a bank account enabled for Automated Clearing House (ACH) direct deposit. Payees with a Wire account are encouraged to provide that information as well.

More information on these and all program pre-submission requirements can be found on the **Coronavirus State and Local Fiscal Recovery Fund website**.

11.5. Why is Treasury employing id.me for the Treasury Submission Portal?

ID.me is a trusted technology partner to multiple government agencies and healthcare providers. It provides secure digital identity verification to those government agencies and healthcare providers to make sure you're you – and not someone pretending to be you – when you request access to online services. All personally identifiable information provided to ID.me is encrypted and disclosed only with the express consent of the user. Please refer to ID.me Contact Support for assistance with your ID.me account. Their support website is https://help.id.me.

11.6. Why is an entity not on the list of eligible entities in Treasury Submission Portal?

The ARPA statute lays out which governments are eligible for payments. The list of entities within the Treasury Submission Portal includes entities eligible to receive a direct payment of funds from Treasury, which include states (defined to include the District of Columbia), territories, Tribal governments, counties, and metropolitan cities.

Eligible non-entitlement units of local government will receive a distribution of funds from their respective state government and should not submit information to the Treasury Submission Portal.

If you believe an entity has been mistakenly left off the eligible entity list, please email SLFRP@treasury.gov.

11.7. What is an Authorized Representative?

An Authorized Representative is an individual with legal authority to bind the government entity (e.g., the Chief Executive Officer of the government entity). An Authorized Representative must sign the Acceptance of Award terms for it to be valid.

11.8. How does a Tribal government determine their allocation?

Tribal governments will receive information about their allocation when the submission to the Treasury Submission Portal is confirmed to be complete and accurate.

11.9. How do I know the status of my request for funds (submission)?

Entities can check the status of their submission at any time by logging into Treasury Submission Portal.

11.10. My Treasury Submission Portal submission requires additional information/correction. What is the process for that?

If your Authorized Representative has not yet signed the award terms, you can edit your submission with in the into Treasury Submission Portal. If your Authorized Representative has signed the award terms, please email SLFRP@treasury.gov to request assistance with updating your information.

11.11. My request for funds was denied. How do I find out why it was denied or appeal the decision?

Please check to ensure that no one else from your entity has applied, causing a duplicate submission. Please also review the list of all eligible entities on the **Coronavirus State and Local Fiscal Recovery Fund website**.

If you still have questions regarding your submission, please email SLFRP@treasury.gov.

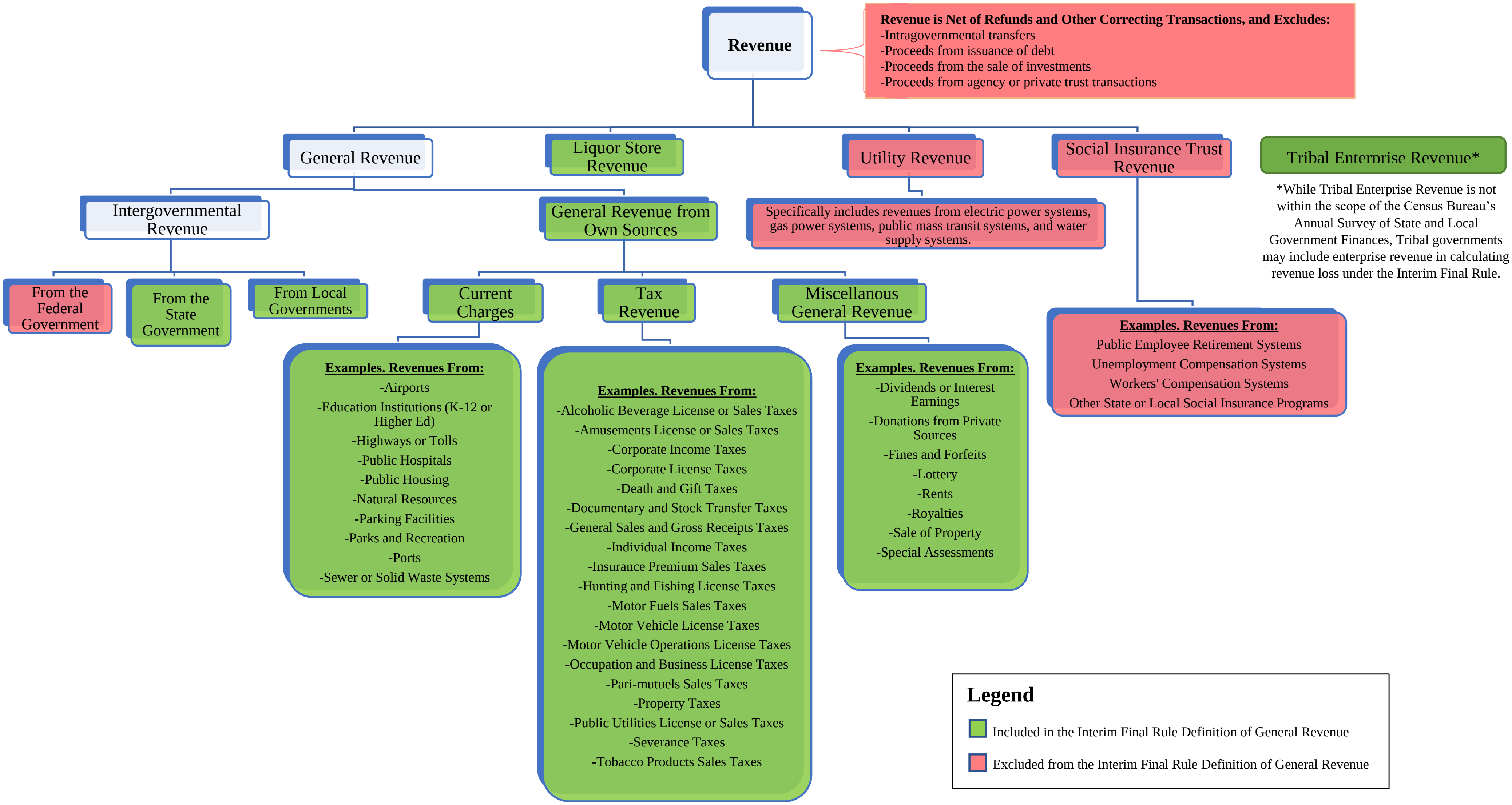
11.12. When will entities get their money?

Before Treasury is able to execute a payment, a representative of an eligible government must submit the government's information for verification through the Treasury Submission Portal. The verification process takes approximately four business days. If any errors are identified, the designated point of contact for the government will be contacted via email to correct the information before the payment can proceed. Once verification is complete, the designated point of contact of the eligible government will receive an email notifying them that their submission has been verified. Payments are generally scheduled for the next business day after this verification email, though funds may not be available immediately due to processing time of their financial institution.

11.13. How does a local government entity provide Treasury with a notice of transfer of funds to its State?

For more information on how to provide Treasury with notice of transfer to a state, please email SLRedirectFunds@treasury.gov.

Appendix: Interim Final Rule Definition of General Revenue Within the Census Bureau Classification Structure of Revenue



Source: U.S. Bureau of the Census Government Finance and Employment Classification Manual, 2006; Annual Survey of State and Local Government Finances

MEMORANDUM

TO: Mark Franz, Village Manager

FROM: John Hubsky, Assistant Public Works Director

DATE: August 24, 2021

RE: Lead Service Lines

The Village has approximately 8,250 service lines, current inventory shows 8,399. Additional cleanup and information gathering is needed to complete the inventory of the public and private side water main material. This will be an objective over the next year, currently the main work is being performed by Elijah Bebora, going through engineering drawings and records. Once that is completed, a concerted effort can be made to identify the inside material, thru means of on-line surveys, site visits, phone calls, etc. For the outside material, this would require vacuum excavation to see the material on either side of the curbstop.

Current estimates but the number of lead service lines, be that full service length, on either the public or private side or cases where galvanized iron pipe remains on the private side after the public portion that was lead was replaced in the 300-500 range. Reviewing past information, about 90% of the lead is on the public side. Perhaps 10% of the private side could be expected to be lead. For galvanized, this number is not well known, since this is a new change to the rules but a conservative guess would be 25% at most.

From recent costs related to construction projects, the average price for a public side replacement is $3,000. The exact cost would vary, based on a near or far side service connection but an budget estimate of $900,000 to $1,500,000 would be a very high level number. The dollar amount could go up or down depending on what continued efforts to improve the inventory record shows.

On the private side, the average cost per foot is $90 and the average service line length is 50’. A budgetary range of $472,500 (35% of 300) to $787,500 (%35 of 500) could be used. Again, the numbers could move up or down as the inventory records are improved or the average length of service is adjusted.

CIVIC CENTER 535 DUANE STREET GLEN ELLYN, ILLINOIS 60137 630.469.5000 FAX 630.469.8849

ILLINOIS LEAD SERVICE LINE REPLACEMENT AND NOTIFICATION ACT

ROADMAP TO COMPLIANCE

LEGEND
LSLR - Lead Service Line Replacement
CWS - Community Water Supply
Material Inventory
LSLR Plan
General Milestones

*With exceptions noted in act

*Updated Material Inventories are due annually per IEPA requirements

*See LSLR schedule below for timeline for completion and annual replacement rate requirements. Compliance requires both conditions to be met.

CONTINUES UNTIL ALL LEAD SERVICE LINES ARE REMOVED

LSLR SCHEDULE
NUMBER OF LSLs REPORTED ON APRIL 15, 2027

	TIMELINE FOR COMPLETION	ANNUAL REPLACEMENT RATE
1,200 OR FEWER	15 YEARS	7%
1,200 - 4,999	17 YEARS	6%
5,000 - 9,999	20 YEARS	5%
≥ 10,000	34 YEARS	3%

Link to EEI Lead & Copper Rule Resources Webpage

For more information, please contact
Kristen Meehan at kmeehan@eeiweb.com or (630) 466-6787

Engineering Enterprises, Inc.
Outstanding Service • Every Client • Every Day
Sugar Grove / Main Office | 52 Wheeler Road, Sugar Grove, IL 60554
Rockford / Branch Office | 124 North Water Street, Suite 306, Rockford, IL 61107
(630) 466-6700

FINANCE COMMISSION
MINUTES
JUNE 11, 2021

CALL TO ORDER:

Jeremy S. VanEk	Chairman	Present
Michael Campagna	Commissioner	Excused Absence
Lea Dan	Commissioner	Present
Lisa A. Cleaver	Commissioner	Present
Scott R. Greeno	Commissioner	Present
Christopher Oakes	Commissioner	Present
Jose DeLeon	Commissioner	Excused Absence
Brenton J. Peck	Commissioner	Present

Also, present: Trustee Payne, Village Manager Franz, Finance Director Coyle, Assistant Finance Director Patrick Brankin, and Recording Secretary Haslett.

A. **Call To Order**

The meeting was called to order at 7:00AM.

B. **Public Comments**

None.

C. **Approval of Minutes**

1. Finance Commission - Regular Meeting – June 11, 2021 7:00 AM

MOVE TO APPROVE MINUTES OF FINANCE COMMISSION MEETINGS AS PRESENTED FROM 6/11/2021.

RESULT	**Motion Unanimously Carried**
MOVER:	**Commissioner Peck**
SECONDER:	**Commissioner Oakes**
AYES:	**Cleaver, Dan, Greeno, J. VanEk, Oakes, and Peck**
ABSENT:	**Campagna and DeLeon**

Finance Director Coyle introduced the new Assistant Finance Director Patrick Brankin.

D. **Financial Reports**

1. General Fund Update –June 2021

Finance Director Coyle said the General Fund is doing well through the end of June with revenues at 9% or $900,000 over the budget. Finance Director Coyle noted the economic turn around has been quicker than expected. In Illinois, unemployment income is taxable, which is driving gains in income taxes for 2021. Liquor licenses, vehicle stickers, police fines, and investment income are trending below budget. Chairman VanEk inquired about the driving force behind the increases in sales and home rule sales taxes. Finance Director Coyle said this increase is partly due to the recent sales tax law change that became effective January 1, 2021. This new law requires online sellers that do not have a physical address in Illinois to calculate sales taxes based upon the destination address. In the past, online sellers paid a general use tax that was distributed by the State on a per-capita basis. Finance Director Coyle noted that if an online seller has a warehouse location in the State, then the sales taxes go to the city where the distribution center is located. Finance Director Coyle said she will provide a sales tax sector data report at the next meeting. Chairman VanEk also asked if food and beverage taxes could be reported on as well, even though these revenues are designated for the Capital Fund.

Finance Director Coyle noted employee vacancies are driving some of the positive budget variances through June. Staff is currently working on the 2022 budget and at the next meeting a 2021 year-end forecast will be provided.

2. <u>Village Links/Reserve 22 Financial Report – June 2021</u>

Finance Director Coyle reported golf continues to do very well, which has had a very positive impact on operations. The Links staff is managing expenditures well. The Links and Reserve 22 continue to experience difficulty in filling job vacancies. The Links continues to build up cash reserves and a portion of the debt service will fall off in 2023. Village Manager Franz noted the Links staff is working on a five (5) year capital plan.

E. **American Rescue Plan**

1. <u>Finance Director Coyle will update the Finance Commission on the American Rescue Plan Act (ARPA) funding.</u>

Finance Director Coyle estimated the Village will receive about $3.7 in American Rescue Plan Act funding. The Village is considered a non-entitlement unit and will receive pass-through funding from the state. The Village began the process of requesting these funds and is reviewing the documentation being requested. The first payment is anticipated to be received approximately 30 days after the portal submission is completed and then the second payment 12 months after that. Funds must be obligated by December 2024 and must be spent by December 2026.

These funds must be earmarked for allowable costs. The ARPA has five (5) spending categories including: public heath expenditures, addressing negative impacts caused by the pandemic, replacing lost revenue, premium pay for essential workers, and water and broadband infrastructure improvements. The unallowable expenses include pension payments and rainy-day funds.

Staff is recommending to first replace the Village's lost revenue. This category is also a practical way which allows the Village to claim the most revenue with the least amount of administrative burden. The lost revenue amount for 2020 is $1 million. Other allowable programs include business funding, water and sewer amnesty program, water infrastructure projects, and possibly allocating a portion of the Village funding to the Glen Ellyn Park District.

The Finance Commission discussed different options for spending the ARPA funds. Commissioner Peck suggested looking at the premium pay options. Chairman VanEk said the Village could do some social good with the funding. Commissioner Dan suggested working with the Park District to offer scholarships to people who cannot afford recreation fees. Finance Director Coyle wrapped up the discussion noting the Finance Commission would like more information about using the ARPA funds for small business assistance, utility billing relief, premium pay, and park district scholarships. Finance Director Coyle explained the Village will most likely claim the money by showing revenue losses, but then the Village must justify how to spend the funds. Village Manager Franz said there may be a way to spend some of the ARPA funds to benefit the senior population. Village Manager Franz noted the Village Board will be discussing this at the August 30, 2021 meeting. Finance Director Coyle also suggested not making any final decisions until the 2022 budget preparation is done.

F. **Trustee Liaison Report**

Trustee Payne updated the Finance Commission on the recent Village Board activities.

G. **Chairman's Report**

Chairman VanEk said there is one Commissioner vacancy and one Student Commissioner vacancy. Chairman VanEk asked the Commissioners to share with him if they knew anyone who would like to serve on the Finance Commission.

H. **Other Business**

1. <u>Economic Development Update</u>

   Village Manager Franz provided a brief update on the Village's economic development activities.

2. <u>Next Meeting Friday, September 10, 2021, 7:00AM</u>

I. **Adjournment**

1. <u>Motion to Adjourn</u>

Commissioner Cleaver moved and Commissioner Oakes seconded, to adjourn the meeting. The meeting was adjourned at 8:23AM.

Submitted by Aileen Haslett, Recording Secretary