Risk Assessment Tool Review and Update

Program Improvement and Family Support-Title I

Title I Administrative Meeting
May 15-16, 2019

Work Group Members Shout Out

- Paula Harris
- Barb Scherr
- Young-Chan Han
- Mary Cross
- Gail Clark Dickson
- Shanna Edmonds
- Kristi Peters

Session Outcomes

By the end of this session, participants will:

- Understand the Uniform Guidance behind the required Risk Assessment;

- Identify the Indicators in the Title I Risk Assessment Tool and the Award Conditions based on the Risk Assessment Score;

- Receive an overview and update of the current work group review of the current tool.

Uniform Guidance

§200.205 Federal Awarding Agency **review of risk** posed by applicants

1. Financial stability;
2. Quality of management systems and ability to meet the management standards prescribed in this Part;
3. History of performance managing Federal Awards:
   ➢ timeliness of compliance with applicable reporting requirements,
   ➢ conformance to the terms and conditions of previous Federal awards,
   ➢ and if applicable, the extent to which any previously awarded amounts will be expended prior to future awards.

Uniform Guidance

§200.205 Federal Awarding Agency review of risk posed by applicants

• Risk Factors:

4. Reports and findings from audits performed under Subpart F;

5. The applicants ability to effectively implement statutory, regulatory, or other requirements imposed on non-Federal entities.

Risk Assessment Indicators

1. How many open grant lines/funding are in the grantee's portfolio? (i.e. there is no final report for the grant)

2. What is the total amount of the funding listed

3. The agency is receiving a new grant they have not been subgrantees for in the past- new complexity

4. High level of complexity in administering the grant

5. Application and Award Required Documents

6. Delayed Implementation

7. Unallowable Actions and Expenditures (including changes in key personnel)- only possible rating is 5.

8. Late Reporting - Reports, Amendments, Deliverables (not including application and award signed documents noted earlier)

9. Low Spend-down Rate

Risk Assessment Indicators

10. Refund Due- Under consideration, not rating outcomes at this time.

11. External Complaints

12. Audit Findings

13. Programmatic Review Required Actions- MSDE monitoring

14. Programmatic Change Requests (change in scope of project or objectives)

15. Program Deliverables (i.e. goals, objectives, and outcomes)-new not rating outcomes at this time

16. Change in Management

17. Use of Subcontractors/Vendors

18. Illegal Activity- only possible rating is 5.

Award Conditions- Monitoring

Activity	Condition Number	Risk Levels 4 and 5	Condition Number	Risk Levels 2 and 3	Condition Number	Risk Level 1
Monitoring	1	*Additional onsite monitoring visits	1A	*Annual onsite Program Monitoring visit	1B	*Annual desk/modified monitoring with focus on critical components
	2	*Assigned to an MSDE monitoring team				

Award Conditions-Technical Assistance

Activity	Condition Number	Risk Levels 4 and 5	Condition Number	Risk Levels 2 and 3	Condition Number	Risk Level 1
Technical Assistance	3	*Title I Orientation Required				
	4	*Mandated attendance at all MSDE Technical Assistance Administrative meetings	4A	*Mandated attendance at all Technical Assistance Administrative meetings	4B	*Mandated attendance at all Technical Assistance Administrative meetings
	5	*Specialized/differentiated TA based on area of risk (follow-up as needed)	5A	*Specialized/differentiated TA based on area of risk (follow-up as needed)		
	6	*Conference call (monthly/quarterly)				
	7	*Drop in visits				
	8	*Face to Face meetings with the LEA supervisory staff of the grant program office				
	9	* Manditory upper level management mtgs.				

Award Conditions- Reporting and Fiscal

Activity	Condition Number	Risk Levels 4 and 5	Condition Number	Risk Levels 2 and 3	Condition Number	Risk Level 1
Reporting	10	*Monthly Report (program/fiscal)	5A	*Quarterly Report (program/fiscal)	5B	*Standard reporting, follow-up as needed
Funding/Fiscal	**11**	*Funding in intervals based on acceptable performance				
	12	*Invoices monthly for reimbursement				
	13	*Delay awarding funds until conditions are met.				

Update

- Work Group is currently reviewing the tool for the next assessment in July 2020, the tool will not change for this year;

- Work Group is cross walking the Title I Tool with other Title programs as we work to consolidate;

- New grants need to be added to the tool and old grants removed such as Priority Schools and Focus Schools;

- Need to address Program Deliverables (goals, objectives and outcomes) metrics.

May 2019

Recommended Strategies

- Monitor spend down to make sure implementation is occurring. Spend your money!

- Timelines- make sure Applications and required reports are submitted on time. Grant Management

- Plan wisely when writing your application to avoid amendments. If an amendment is needed, don't wait to submit to your POC for review. Do this early in the year.