



Southwest Georgia Workforce Development Board

Policy/Procedure Name: **Pre-Award/Contract Renewal Finance/Program Risk Assessment Tool**

Policy/Procedure #: **WIOA-2018-074**

Effective Date: February 28, 2018

Revision Date: December 1, 2020

### **PURPOSE**

To effectively monitor risks associated with financial awards made with federal pass through funds to sub recipients. The focus is to ensure that awarded programs meet the following requirements: adhere to the City of Colquitt/Southwest Georgia Workforce Development Board (WDB)'s guidelines and agreements, remain within budget, carry out the scope of services, and insure that proper internal controls are in place.

### **BACKGROUND**

Pursuant to regulations found in 2 C.F.R. § 200.331, the LWDA is required to complete a risk assessment on each subrecipient of pass-through federal funds. This risk assessment is completed annually and is included in each executed subaward.

For new subrecipients, this risk assessment will be completed prior to the execution of any subrecipient agreements or awards and may impact the required monitoring and documentation that must be provided to the LWDA on a regular basis. Additional conditions, based on risk level, may include an increase in onsite monitoring visits, more frequent financial and programmatic reporting, additional documentation to support the reimbursement of costs incurred in the implementation of the sub-award, and other conditions as prescribed by the LWDA.

### **STATE POLICY**

Reference Technical College System of Georgia, Office of Workforce Development (OWD) Policy and Procedure Section 2.2.6 Pre-Award Review and Risk Evaluation

### **ATTACHMENT**

- WorkSource Southwest Georgia Pre-Award/Contract Renewal Finance/Program Risk Assessment Tool

Policy #: WIOA-2018-74

Revision Date: December 1, 2020

**WORKSOURCE SOUTHWEST GEORGIA  
PRE-AWARD/CONTRACT RENEWAL FINANCE/PROGRAM RISK ASSESSMENT TOOL**

**Purpose.** To effectively monitor risks associated with financial awards made with federal pass through funds to sub recipients. The focus is to ensure that awarded programs meet the following requirements: adhere to the City of Colquitt/Southwest Georgia Workforce Development Board (WDB)'s guidelines and agreements, remain within budget, carry out the scope of services, and insure that proper internal controls are in place.

**Procedure.** Based on an evaluation of the awardee's award application, internal controls and past history with grant awards, WorkSource Staff shall rate each category below. Scores will then be added to determine if the level of risk is high, medium or low.

**Risk Assessment.** The risk score determines the order in which staff will evaluate the grant program and/or perform a site visit.

- A score of 43 – 64 requires **intensive follow-up** and improvement based on a thorough evaluation of the grant project and execution of the approved corrective action plan;
- A score of 27 – 42 requires evaluating areas that **need improvement** and improving those areas based on the approved corrective action plan;
- A score of 26 or less generally identifies that the program is at **lower** risk for potential waste, mismanagement, non-compliance or fraud.

The decision to award new applicants from an open competitive RFP, RFQ or other soliciting means, or to renew existing contracts for an additional year, or more, will take into consideration the pre-award risk assessment tool. While this does not mean that this will be the only means of determining recipients of awards, it will play a role in the final decision. All final decisions will be communicated to applicants, and/or potential renewals in the form of an informative letter.

<b>Awardee Name:</b>	
<b>Financial Award Number:</b>	
<b>Award Project Name:</b>	
<b>Awardee EIN:</b>	
<b>Risk Assessment completed by:</b>	
<b>Date assessment completed:</b>	
<b>Project Year:</b> From the date of the signed contract or agreement between City of Colquitt/WDB and the awardee	<input type="checkbox"/> Year 1 (0-12 months) <input type="checkbox"/> Year 2 (13-24 months) <input type="checkbox"/> Year 3 (25-36 months) <input type="checkbox"/> Year 4 + (37 months or more)
<b>Total Score/Level:</b> (            )	<input type="checkbox"/> High <input type="checkbox"/> Medium <input type="checkbox"/> Low

<b>Risk Level</b>	<b>Risk Assessment Guidelines</b>
<p><b>High</b> <b>(43 – 64)</b></p>	<p>WorkSource Staff completing the assessment will identify factors that contributed to the high-risk score. WorkSource Staff will prepare and distribute a report that outlines the non-compliance issues and areas that require improvement. The report will be distributed to the awardee and respective WorkSource Staff. The awardee shall respond with a Corrective Action Plan within 14 business days. The WorkSource Staff will then provide a schedule of the evaluation process and site visits required. The awardee may be required to submit more frequent progress/performance/financial reports until further notice.</p> <p>The awardee shall receive technical assistance upon request.</p>
<p><b>Medium</b> <b>(27 – 42)</b></p>	<p>WorkSource Staff completing the assessment will identify factors that contributed to the medium-risk score. WorkSource Staff will prepare and distribute a report that outlines the non-compliance issues and areas that require improvement. The report will be distributed to the awardee and respective WorkSource Staff. The awardee shall respond with a Corrective Action Plan within 14 business days. The WorkSource Staff will then provide a schedule of the evaluation process and site visits required. The awardee may be required to submit more frequent progress/performance/financial reports until further notice.</p> <p>The awardee shall receive technical assistance upon request.</p>
<p><b>Low</b> <b>(13 – 26)</b></p>	<p>WorkSource Staff will continue to monitor progress/performance/financial reports for accuracy, timeliness, and no significant program changes.</p> <p>An award evaluation or site visit may be conducted that will be separate from the required annual monitoring.</p>

AWARDEE DATA (if not applicable, indicate N/A on header line)	SCORE
<b>1. Awardee's Agency/Organization (R)</b> <b><i>Must be completed for all potential awardees</i></b>	
Within the past 10 years, the awardee's agency/organization has > 3 years of experience with awards from City of Colquitt/WDB and demonstrates an active interest in the program to the respective WorkSource Staff Program Manager/Coordinator(s).	<b>1</b>
Within the past 10 years, the awardee's agency/organization has > 1-2 years of experience with awards from City of Colquitt/WDB and demonstrates an active interest in the program to the respective WorkSource Staff Program Manager/Coordinator(s).	<b>2</b>
Within the past 10 years, the awardee's agency/organization has limited experience with awards from City of Colquitt/WDB and demonstrates an active interest in the program to the respective WorkSource Staff Program Manager/Coordinator(s).	<b>3</b>
Within the past 10 years, the awardee's agency/organization has limited experience with awards from City of Colquitt/WDB and demonstrates <b>no active</b> interest in the program to the respective WorkSource Staff Program Manager/Coordinator(s).	<b>4</b>
Awardee's agency/organization hinders the policy and/or requirements of the program	<b>5</b>
<b>Comments:</b>	
<b>2. Agency /Organization Experience Managing Any Type of Grant funds</b> <b><i>Must be completed for all potential awardees</i></b>	
Over ten (10) years of experience	<b>1</b>
Five (5) to ten (10) years of experience	<b>2</b>
Two (2) to five (5) years of experience	<b>3</b>
Less than two (2) years of experience	<b>4</b>
No experience	<b>5</b>
<b>Comments:</b>	
<b>3. Agency/Organization Experience Administering this Program</b> <b><i>Must be completed for renewal awardees ONLY</i></b>	
Awardee's 3 <sup>rd</sup> , 4 <sup>th</sup> or higher program year <b>AND</b> original program director/manager	<b>1</b>
Awardee's 4 <sup>th</sup> or higher program year; <b>NOT</b> original program director/manager	<b>2</b>
Awardee's 2 <sup>nd</sup> or 3 <sup>rd</sup> program year; <b>NOT</b> original program director/manager	<b>2</b>
Awardee's 1 <sup>st</sup> or 2 <sup>nd</sup> program year <b>AND</b> original program director/manager	<b>3</b>
Awardee's 1 <sup>st</sup> or 2 <sup>nd</sup> program year; <b>NOT</b> original program director/manager	<b>4</b>

High turnover of program director and/or key staff (more than 2 key staff turnovers within 18 months)	<b>5</b>
<b>Comments:</b>	
<b>4. Program Requirements</b> <b><i>Must be completed for renewal awardees ONLY</i></b>	
Awardee has provided services and met <u>all</u> program objectives specified in contract's scope of services/goals for the past 12 months	<b>1</b>
Awardee has provided services and met <u>most</u> program objectives specified in contract's scope of services/goals for the past 12 months	<b>2</b>
Awardee has provided services and met <u>some</u> program objectives specified in contract's scope of services/goals for the past 12 months	<b>3</b>
Key staff lacks the experience, necessary knowledge, skills and abilities to perform the job duties.	<b>4</b>
High turnover of key staff (more than 1 key staff turnover within 18 months)	<b>5</b>
<b>Comments:</b>	
<b>PROGRAMMATIC COMPLIANCE</b>	
<b>5. Regular Participation in Required Trainings/Meetings</b> <b><i>Must be completed for renewal awardees ONLY</i></b>	
Awardee's director/manager and/or key staff attend <u>all</u> required trainings/meetings	<b>1</b>
Awardee's director/manager and/or key staff attend <u>most</u> required trainings/meetings	<b>2</b>
Awardee's director/manager and/or key staff attend <u>some</u> required trainings/meetings	<b>3</b>
Awardee's director/manager and/or key staff rarely attend required trainings/meetings	<b>4</b>
Awardee's director/manager and/or key staff do not attend required trainings/meetings	<b>5</b>
<b>Comments:</b>	
<b>6. Communication</b> <b><i>Must be completed for renewal awardees ONLY</i></b>	
Awardee's director/manager and/or key staff always respond to WorkSource Staff's requests in a timely manner	<b>1</b>

Awardee's director/manager and/or key staff usually respond to WorkSource Staff's requests in a timely manner	<b>2</b>
Awardee's director/manager and/or key staff rarely respond to WorkSource Staff's requests in a timely manner	<b>4</b>
<b>Comments:</b>	
<b>7. Performance Measures (Start of the Program through Current)</b>	
<b><i>Must be completed for renewal awardees ONLY</i></b>	
Performance mostly exceeds the requirements	<b>1</b>
Performance mostly meets the requirements	<b>2</b>
Performance mostly does not meet the requirements	<b>5</b>
<b>Comments:</b>	
<b>FINANCIAL MANAGEMENT</b>	
<b>8. Single Audit</b>	
<b><i>Must be completed for all potential awardees required to have Single Audits</i></b>	
Single Audit with no findings	<b>1</b>
Single audit with significant deficiency finding(s)	<b>2</b>
Single audit with material weakness finding(s)	<b>3</b>
Single audit with <b>both</b> material weaknesses and significant deficiency findings	<b>4</b>
No single audit performed	<b>5</b>
<i>If any findings have not been resolved, add an additional point to the selection.</i>	<b>1</b>
<b>Comments:</b>	
<b>9. Other Independently Prepared Financial Reports (for those not required to have Single Audits)</b>	
<b><i>Must be completed for all potential awardees</i></b>	
Reports are in good order with no noticeable concerns	<b>1</b>
Reports are in good order with little noticeable concerns	<b>2</b>
Reports have some noticeable concerns	<b>4</b>
Reports have major noticeable concerns	<b>5</b>
<i>If there are any unsuccessful resolution of concerns, add an additional point to the selection.</i>	<b>1</b>
<b>Comments:</b>	

<b>10. Amount of funding awarded for this Program</b> <b><i>Must be completed for all potential awardees</i></b>	
Annual Financial Obligation of \$0 – \$49,999.99	<b>1</b>
Annual Financial Obligation of \$50,000 – \$129,999.99	<b>2</b>
Annual Financial Obligation of \$130,000 – \$199,999.99	<b>3</b>
Annual Financial Obligation of \$200,000 – \$299,999.99	<b>4</b>
Annual Financial Obligation of \$300,000 or more	<b>5</b>
<b>Comments:</b>	
<b>11. Subcontracts</b> <b><i>Must be completed for all potential awardees</i></b>	
Awardee does not subcontract	<b>1</b>
Awardee has, or will have 1 – 2 subcontracts	<b>2</b>
Awardee has, or will have 3 – 4 subcontracts	<b>4</b>
Awardee, has or will have 5 or more subcontracts	<b>5</b>
<b>Comments:</b>	
<b>12. Financial Reporting (Invoicing)</b> <b><i>Must be completed for renewal awardees ONLY</i></b>	
Is always timely and accurate	<b>1</b>
Is timely and accurate most of the time	<b>2</b>
Has not been timely, but mostly accurate	<b>3</b>
Has not been timely or accurate	<b>5</b>
<b>Comments:</b>	

<b>13. Budget</b>	
<b><i>Must be completed for all potential awardees</i></b>	
Program is practically on-budget	<b>1</b>
Program is not on budget, and the reason(s) have been justified	<b>3</b>
Program is not on budget and reasons have not be satisfactorily justified	<b>5</b>
<b>Comments:</b>	

**Additional Comments:**

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Date

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