

Idaho 21st CCLC Risk Assessment

The SDE evaluates each subgrantee's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate monitoring (2 C.F.R. §200.331(b)). Effective risk assessments allow the SDE to identify specific areas of non-compliance to provide: (1) training and technical assistance on program-related matters; (2) on-site reviews; and (3) agreed-upon audit procedures (§200.331(e)). In order to better assist subgrantees, the SDE will use three tiers for risk assessment: low risk, moderate risk and high risk.

****Subgrantees are not required to fill out this assessment themselves. This template is provided as a reference for how risk is assessed by the SDE.****

Performance and Compliance	Criteria	Points
1. Attendance	Met target number for participation (Y=0)	
	Didn't meet target number for participation (Y=10)	
2. Family Events	Three or more family events were offered (Y=0)	
	Two or fewer family events were offered (Y=10)	
3. Program Amendments	Two or fewer amendments in one program year (Y=0)	
	Three or more amendments in one program year (Y=10)	
Grant Management	Criteria	Points
1. Director experience	Director has been in role for two or more years (Y=0)	
	Director has been in role for less than two years (Y=5)	
2. Director status	Director role is a full-time position (Y=0)	
	Director role is part-time or position is shared between multiple staff (Y=5)	
3. Partnerships	Grant still collaborates with application partner (Y=0)	
	Partnership has been reduced or withdrawn completely (Y=10)	
4. Professional Development	Director attended Fall and Spring SDE trainings (Y=0)	
	Director missed one or more mandated trainings (Y=5)	
5. Participation	Director participated in all monthly SDE calls (Y=0)	
	Director participated in three or more monthly SDE calls (Y=5)	
	Director participated in two or fewer monthly SDE calls (Y=10)	
6. Responsiveness	Director is generally responsive to SDE calls and emails (Y=0)	
	Director is slow to respond or unresponsive to SDE calls or emails (Y=5)	
7. Staff Training	Director provided two or more trainings for all program staff (Y=0)	
	Director provided zero or one training for all program staff (Y=5)	
8. Data Tracking	EZ Reports is updated monthly (Y=0)	
	EZ Reports is updated infrequently or is incomplete (Y=10)	
Monitoring and Audits	Criteria	Points
1. Withdrawal or termination of past grant	No withdrawal/termination (Y=0)	
	Withdrawal/termination of past grant (Y=10)	
2. Outside findings (Federal Programs, Nutrition or CBO independent audit)	No significant findings identified (Y=0)	
	One or more findings (Y=10)	
3. Past monitoring	Grant monitored within the last two years with minimal issues (Y=0)	
	Grant monitored within the last two years with three or more issues (Y=5)	
	Grant is in first year or has not been monitored in three or more years (Y=10)	
Fiscal	Criteria	Points
1. Number of awards	Grantee only has one 21st CCLC award (Y=0)	
	Grantee has more than one 21st CCLC award (Y=5)	
2. Award amount	Annual award amount is \$120,000 or less (Y=0)	
	Annual award amount is greater than \$120,000 (Y=5)	
3. Budget	Budget submitted on time (Y=0)	
	Budget submitted late or with errors (Y=5)	
4. Unspent funds	Less than 10% of the annual award was unspent (Y=0)	
	More than 10% but less than 25% of annual award was unspent (Y=5)	
	More than 25% of the annual award was unspent (Y=10)	
5. Reimbursement	Requests are submitted at least quarterly (Y=0)	
	Two or fewer requests were submitted (Y=10)	
6. Unallowable purchases	No unallowable purchases (Y=0)	
	One or more unallowable purchases denied for reimbursement (Y=10)	
7. Fiscal Agent	Fiscal agent is a local education agency (LEA) or charter (Y=0)	
	Fiscal agent is a community based or religious organization (Y=5)	
Total Points for Grantee		Points

Low Risk: 0-20 points Moderate Risk: 25-45 points High Risk: 50+ points

The SDE will conduct a risk assessment for every subgrantee at the end of each program year. Subgrantees classified as low risk will be notified of their risk status but will require no further action. Subgrantees classified as moderate risk may be subject to additional restrictions. The SDE may classify a subgrantee as high risk due to non-compliance, poor performance or years since the program was monitored. As a result of this classification, special conditions and restrictions may be required of the subgrantee (2 C.F.R. §§ 200.205 and 200.207). Restrictions may include more detailed reporting, program changes or additional monitoring. The SDE may monitor any grantee regardless of risk level.