

Risk Assessment Form

Organization Name		Grant Number	
Program Name		Total Score & Risk Level	

Purpose

To provide an equitable process and criteria to effectively assess risk and monitor compliance and progress of AmeriCorps State subrecipients in Montana, and to satisfy the requirements of 2 CFR § 200.332. Risk assessment considers the subrecipient and the program performance. Risk determination will aid the Governor’s Office of Community Service (GOCS) in providing exceptional technical assistance, both onsite and offsite, based on program needs. A risk determination for an established (year 2 or later) subrecipient may be considered as part of the grant application review process. Training and technical assistance will be based on the risk assessment as well as needs and opportunities as they arise. At the discretion of GOCS staff, the risk level of a program and identified areas of risk may be reconsidered at any time.

Procedure

Using this assessment, GOCS will annually evaluate each Montana AmeriCorps subrecipient, which will then be assigned a risk level of Low, Medium, or High. Risk assessments will be conducted with results provided to the subrecipient and retained on file at GOCS. Compliance monitoring is tailored to identified areas of risk during GOCS’s pre-monitoring process. Regardless of the categories that contribute to a subrecipient’s risk level, pre-monitoring activities for all subrecipients always include a review of identified nationwide high-risk items such as National Service Criminal History Checks, member files, timekeeping, and travel. All subrecipients will be required to submit a small number of sample documents for these nationwide high-risk areas during pre-monitoring.

Note

First-year AmeriCorps subrecipients are considered high risk by default and are subject to financial and programmatic compliance monitoring, with a spirit of providing sufficient technical assistance and training for the program to succeed. Regardless of risk determination, subrecipients that have not been monitored in 2 years may be subject to compliance monitoring through a site visit or desk review. Corrective action may be applied any time in the performance period or life of the grant.

High Risk determination (16+ points): Commission staff will monitor the subrecipient by conducting at least one site visit per year, to be scheduled so that the subrecipient has reasonable time to complete any previously identified corrective action. Monitoring will focus on the factors that influenced the risk determination. Additional monitoring and corrective action will be conducted as needed to track compliance efforts. Ongoing training and technical assistance will be provided formally and informally.

Medium Risk determination (9-15 points): Commission staff will monitor the subrecipient by conducting at least one site visit or desk review per year or by implementing corrective action, based on a case-by-case determination. Monitoring will focus on the factors that influenced the risk determination. Additional monitoring and corrective action will be conducted as needed to track

compliance efforts. Ongoing training and technical assistance will be provided formally and informally.

Low Risk determination (0-8 points): Commission staff will monitor the subrecipient by conducting at least one site visit or desk review every three years to include programmatic and/or fiscal components. Ongoing training and technical assistance will be provided formally and informally.

Consider all questions pertaining to the last full grant year unless otherwise specified.

Section One: Organizational Capacity and Staffing (points for “yes” answers)

	Risk Factors	Yes	No	Comment
1	Is the subrecipient in their first three-year cycle receiving funds through the Governor’s Office of Community Service? (2 pts)			
2	Has the subrecipient had turnover in key staff or a substantial change in a system (e.g., accounting, data collection, timekeeping)? (1 pt)			
3	Do primary <i>programmatic</i> staff have fewer than 5 years combined experience with AmeriCorps State & National grant management? (1 pt)			
4	Do primary <i>financial</i> staff have fewer than 5 years combined experience with federal grant management? (1 pt)			
5	Has GOCS issued a Management Decision requiring corrective action? (2 pts)			
6	Does the subrecipient have a documented history in the last 2 years of not maintaining and/or following adequate policies and procedures, such as financial and NSCHC policies? (2 pts)			
7	Are there ongoing corrective actions or other items from previous years' monitoring that continue to pose a risk? (3 pts) <i>Previous year’s risk level:</i>			
8	Has GOCS received any credible complaints regarding the program? (2 pts)			
9	Does the subrecipient have unmet expectations regarding communications with GOCS, such as returning phone calls, promptly communicating by email, sharing credit for success, being cordial and professional even during disagreements, communicating updates/issues/good ideas, or following through			

	on commitments? (1 pt)			
10	Additional concerns or notes? (1 pt for each additional concern)			
Section Total Points (16 maximum)				

Section Two: Program Management (points for “yes” answers)

	Risk Factors	Yes	No	Comment
1	Has it been more than two years since the last compliance monitoring visit or desk review? (1 pt)			
2	Has the subrecipient made substantial changes in program design or scope in the past year? (1 pt)			
3	In the past 2 program years, has the subrecipient not provided quality training and communications for sites and site supervisors (e.g., clear MOUs, handbooks)? (1 pt)			
4	In the past 2 program years, has the subrecipient not offered and documented quality training for members? (1 pt)			
5	Has the subrecipient submitted any late financial reports? (2 pts)			
6	Has the subrecipient submitted any inaccurate financial reports? (2 pts)			
7	Is the subrecipient’s current match on track to be below the budgeted match percentage of ____%? (2 pts, NA for fixed award) <i>Budgeted match amount: \$</i>			
8	Has the subrecipient submitted any late progress reports? (2 pts)			
9	Has the subrecipient submitted any inaccurate progress reports? (2 pts)			
10	Has subrecipient staff had an unexcused absence for any required training, including bimonthly conference calls? (2 pts)			
11	In the last two program years, was the program’s enrollment rate less than 100%? (1 pt if pattern is indicated) <i>Enrollment rate current year:</i> <i>Enrollment rate previous year:</i>			
12	In the last full program year, were any members enrolled in eGrants later than 8 days? (2 pts)			

	Risk Factors	Yes	No	Comment
13	In the last two program years, was the program's retention rate below 90%? (1 pt if pattern is indicated) <i>Retention rate current year:</i> <i>Retention rate previous year:</i>			
14	In the last full program year, were any members exited in eGrants later than 30 days? (2 pts)			
15	Does the subrecipient have any unmet performance measures or undocumented progress toward performance measures? (1 pt)			
16	Does the subrecipient have any unmet evaluation-related requirements, such as timely submitting an evaluation plan, revisions, and completed evaluation? (1 pt)			
17	Does the subrecipient have unmet expectations in relation to inviting GOCS & Commissioners to events such as orientation, service projects and end of service, at least 30 days in advance? (1 pt)			
18	Additional concerns or notes? (1 pt for each additional concern)			
	Section Total Points (26 maximum)			

Section and overall totals	
Organizational Capacity & Staffing Section	of 16
Program Management Section	of 26
Total Points	