I Grant You Permission

Subrecipient Risk Assessment and Monitoring
Presented By Jacqueline Thorne & Brandi Karfonta
Maryland Department of Transportation The Secretaries Office
Mentimeter

Live Survey

Available in your app store search or www.menti.com

Code 9819
MENTI Live Survey Question 1
Code 9819

• Survey of who we have in the room. Work is your work title?
  Procurement Officer
  Finance AP or AR
  Grant Managers/Project Managers
  Auditors
  Quality Control
  Other
What is your Work Title?
Presentation Flow

- Introduction
- Purpose
- Risk Factors
- Taking a Risk vs Risk Taking
- Sample Risk Register
- Draft Pre-Award Risk Assessment Tool
Overview

- The journey of grant award through grant close out. The purpose is to voyage through what happens after the Request for Proposal (RFP) is accepted and you receive the award letter.
- The procurement, management & financial responsibilities to the closeout of the grant.
- The tips and tools used can be implemented within any contract or funding source. In addition, the value of Risk Assessments and how to risks analysis can assist the throughout the grant life-cycle.
MENTI Live Survey Question 2
Code 9819

What sector do you represent? Survey clinch did not capture.

• FED
• State
• Local
• Not for Profit
• Private (Consultant, Contractor)
• Other
I Grant You Permission

• The presentation is related to FEDERAL Grants. While there are several types of grants on the State & Local level, many of the tools, resources utilized during the grants awarded by Federal Agencies are transferrable and extremely useful for any grants you're either awarded, managed or sub-recipients.

• Statewide Risk Assessment Tool
## Risk Register Scoring Matrix

<table>
<thead>
<tr>
<th>Score</th>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
<th>5</th>
</tr>
</thead>
<tbody>
<tr>
<td>Probability</td>
<td>&lt; 10%</td>
<td>&lt;&gt; 10% - 49%</td>
<td>&lt;&gt; 50% - 75%</td>
<td>&lt;&gt; 76% - 90%</td>
<td>&gt; 90%</td>
</tr>
<tr>
<td>Schedule</td>
<td>&lt; 2 wks</td>
<td>&lt;&gt; 2 wks - 1 month</td>
<td>&lt;&gt; 1 - 3 months</td>
<td>&lt;&gt; 3-6 months</td>
<td>&gt; 6 Months</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>1</th>
<th>2</th>
<th>3</th>
<th>4</th>
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<tr>
<td>1</td>
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<td>2</td>
<td>3</td>
<td>4</td>
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<tr>
<td>2</td>
<td>2</td>
<td>4</td>
<td>6</td>
<td>8</td>
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<tr>
<td>3</td>
<td>3</td>
<td>6</td>
<td>9</td>
<td>12</td>
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<tr>
<td>4</td>
<td>4</td>
<td>8</td>
<td>12</td>
<td>16</td>
</tr>
<tr>
<td>5</td>
<td>5</td>
<td>10</td>
<td>15</td>
<td>20</td>
</tr>
</tbody>
</table>

Score = Probability x Potential Schedule Impact
Priority Risk Factor

Factoring Potential Cost Exposure to MDOT

Confidence Level 0 – 100%

Cost Analysis
Financial Exposure to MDOT for any overrun beyond FRA Grant Deadline

$ Exposure

14 B & P Tunnel – Schedule and Risk Assessment
March 2015
# Grant Life Cycle

<table>
<thead>
<tr>
<th>Pre-Award Phase</th>
<th>Funding Opportunity Announcement &amp; Application Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>Award Phase</td>
<td>Award Decisions &amp; Notifications</td>
</tr>
<tr>
<td>Post Award Phase</td>
<td>Implementation, Reporting &amp; Closeout</td>
</tr>
</tbody>
</table>
**Pre-Award Phase**

<table>
<thead>
<tr>
<th>Grantor Actions</th>
<th>Lifecycle Steps</th>
<th>Applicant Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>In the early stages of the grant process, the grant-making agency plans and develops a funding program based on its mission, the Administration, and congressional initiatives.</td>
<td>Planning an Opportunity</td>
<td></td>
</tr>
<tr>
<td>Next, the grant-making agency formally <strong>announces the funding opportunity</strong>, advertising it to applicant communities and inviting proposals tailored to address the program mission. The grant-making agency will publish details of the funding opportunity on Grants.gov.</td>
<td>Announcing an Opportunity</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Searching for Opportunities</td>
<td>Potential applicants will use the Grants.gov search tool to find funding opportunities that they are eligible for and are a mission match for their organization.</td>
</tr>
<tr>
<td></td>
<td>Registering on Grants.gov</td>
<td>When potential applicants have identified an opportunity to apply for, they need to <strong>register with Grants.gov</strong>. Applicants should also check the funding opportunity for additional registration requirements specified by the grant-making agency.</td>
</tr>
<tr>
<td></td>
<td>Completing an Application</td>
<td>Completing a grant application can take weeks. The application package can be downloaded from Grants.gov in the form of a PDF, and progress can be saved as form fields are filled in. These fields require everything from basic organizational information, to explanations of proposed work and financial data. When an application package has been completed per the opportunity instructions and checked for errors, it can be submitted through Grants.gov.</td>
</tr>
<tr>
<td>When an application has been submitted, the application is retrieved by the grant-making agency and screened for compliance. If it passes initial screening, the application is routed to the appropriate agency program for consideration.</td>
<td>Retrieving the Application</td>
<td>Once an application has been retrieved by the agency from Grants.gov, the applicant is automatically notified via email. At this point, the grantor application processing begins.</td>
</tr>
<tr>
<td></td>
<td>Staying in the Loop</td>
<td>Applicants can track the status of their application by communicating with the grant-making agency. The application status process is handled differently by each agency.</td>
</tr>
<tr>
<td>As the funding agency reviews applications, a range of program stakeholders will participate. The review process takes time and varies based on grant type. As the review process takes place, grant-making agencies may update applicants on the status of their application.</td>
<td>Finishing the Review Process</td>
<td></td>
</tr>
</tbody>
</table>
# Award Phase

<table>
<thead>
<tr>
<th>Grantor Actions</th>
<th>Lifecycle Steps</th>
<th>Applicant Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>When the review process has been completed, the funding agency <strong>notifies the applicants</strong> whether or not they have been awarded a grant. The agency also begins working with the award recipient to finalize the legal framework for the funding agreement. Following this, the funds are disbursed.</td>
<td><strong>Notifying the Award Recipient</strong></td>
<td>After an applicant receives a <strong>Notice of Award</strong> and the funds have been disbursed, they will begin their project. The award recipient is responsible for meeting the administrative, financial, and programmatic reporting requirements of the award.</td>
</tr>
<tr>
<td></td>
<td><strong>Beginning the Hard Work</strong></td>
<td></td>
</tr>
</tbody>
</table>

# Post Award Phase

<table>
<thead>
<tr>
<th>Grantor Actions</th>
<th>Lifecycle Steps</th>
<th>Applicant Actions</th>
</tr>
</thead>
<tbody>
<tr>
<td>After an award has been disbursed, a grants management officer at the funding agency oversees an awardee’s <strong>reporting</strong> compliance. This process extends across the life of the grant award and involves reviewing reports submitted by the awardees. Representatives from the grantor agency may perform on-site visits with the project director and implementation staff. Oversight may also occur in the form of <strong>auditing</strong>.</td>
<td><strong>Providing Support and Oversight</strong></td>
<td>Award recipients conduct two primary types of <strong>reporting</strong> to the funding agency on a regular basis: financial reporting and programmatic reporting. These reports provide information about the overall financial status and program performance of the grant project. Recipients must also respond to any <strong>audit requests</strong> that pertain to the grant.</td>
</tr>
<tr>
<td></td>
<td><strong>Reporting Your Progress</strong></td>
<td></td>
</tr>
<tr>
<td></td>
<td><strong>Award Closeout</strong></td>
<td></td>
</tr>
</tbody>
</table>

As reports and financial data are passed along to the grantor agency, the program stakeholders ensure that all requirements are being met. Upon completing all the **closeout** requirements, including a review of the final financial and technical reports from the awardee, the grant lifecycle comes to an end.
Monitoring Multiple Grant Recipients

• As a grantee, how do I manage multiple recipients?

• Good Attitude

• Meet with grant partners- often
  • Schedule
  • Deliverables
  • Budget
  • Task Breakdown
What if I am audited, where do I begin?

• Documentation Ready & Available
• Know your sub-recipients labor rates & policies annually?
• Indirect Costs Rate vs Direct Cost
• Know your Agency weaknesses (Internally)
• Program/Project quirks
Audience Feedback-Audits

**Auditor**
- Don’t offer more than what was asked
- If you don’t know tell the Auditor and find the person who handles that request/function

**Auditee**
- Give yes not answers
- Know your data
Standard Forms Types

- QGPR-Quarterly Grant Progress Report
- Request for Advance or Reimbursement SF-270
- MPR- Milestone Progress Report
- QPR - Quarterly Progress Report
MENTI Live Survey Question 3
Code

• Which grant process is most troubling for you?

• Please limit to 3 words or less
Which grant process is most troubling for you?
Grant Identifiers

- IRS Vendor Number
- CFDA
- Award Number
  - Project Numbers
  - PO Numbers
- Agency Tracking Numbers
- SAM
- **DUNS** - See new Unique Entity Identifier (UED) will assign when updating sam.gov registration
Grant types

- Environmental
- Engineering
- Construction
- Rehabilitation
Participant Grant types

- Education
- Health
- Human Services
- Housing
- Environmental
- Not for Profit
### State of Maryland Subrecipient Pre-Award Risk Assessment Tool (2 CFR Part 200.331)

The purpose of this Pre-Award Risk Assessment Tool is to evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations and the terms and conditions of the award.

(Complete all areas in green)

<table>
<thead>
<tr>
<th>Subrecipient Entity Name:</th>
<th>Risk Assessment Completed By:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Federal CFDA Award Number:</td>
<td>State Agency Name:</td>
</tr>
<tr>
<td>Subrecipient Award Number:</td>
<td>Risk Assessment Completed Date:</td>
</tr>
<tr>
<td>State Agency Tracking Number:</td>
<td></td>
</tr>
<tr>
<td>Other tracking number (if any):</td>
<td></td>
</tr>
<tr>
<td>Program Name:</td>
<td></td>
</tr>
<tr>
<td>Subrecipient Award Period:</td>
<td>Date of Last Risk Assessment:</td>
</tr>
<tr>
<td>Data Universal Numbering System (DUNS):</td>
<td>Last Risk Rating: (drop down, low, medium, high)</td>
</tr>
<tr>
<td>System of Award Management (SAM) Number:</td>
<td></td>
</tr>
<tr>
<td>Employer Identification Number (EIN):</td>
<td></td>
</tr>
<tr>
<td>Federally Approved Indirect Cost Rate, if any:</td>
<td>Total Score: 0</td>
</tr>
<tr>
<td>Date Indirect cost rate approved by Cognizant Agency:</td>
<td>Risk Assessment Rating:</td>
</tr>
</tbody>
</table>

A yes to any of the following three questions legally requires a hard stop to initiating agreement:

1. Award Amount (enter amount): (Small 25,000/ Medium 25,000-250,000/ Large >250,000 dropdown)
2a. The accounting system completely and accurately tracks the receipt and disbursements of this federal award? (Automated=0/Manual=2/Combination=1 dropdown)
2b. There are adequate systems to segregate indirect costs from direct costs. (yes/no dropdown)
2c. There are adequate systems for internal controls and the separation of duties. [200.303] (yes/no dropdown)
3. There are adequate Procurement or Sub-award procedures in place. [200.317 and 200.331] (yes/no dropdown)
4. There are compliance procedures in place to meet the terms and conditions of this award. (yes/no dropdown)
5. Time Tracking: The Entity requires staff to track 100% of their time and their time associated with this award? (yes/no dropdown)
6a. Single Audit: If the Entity received $750,000 or more in Federal funding, was a Single Audit completed? (yes/no dropdown)
6b. If a Single Audit was completed, was there one or more relevant findings which may affect this award? (yes/no dropdown)
7a. Other Audit: Was the Entity a subject of an Office of Legislative Audits (OLA) or Office of Inspector General (OIG) audit? [200.331 (b) 4] (yes/no dropdown)
7b. Other Audit: Was the Entity a subject of an Office of Legislative Audits (OLA) or Office of Inspector General (OIG) audit? (yes/no dropdown)

Is the Subrecipient Entity presently debarred or suspended? [200.205 (d) and 200.213] (yes no dropdown)
Does the Subrecipient show "delinquent federal debt" in SAM? (yes no dropdown)
Is the Subrecipient Entity's Principal Investigator presently debarred or suspended? (yes no dropdown)
**9. Annual Program and Budget Reporting. For the most recent year,**

- **9a.** The Entity submitted timely, accurate and adequate performance reports for prior grant awards.
- **9b.** Reasonable progress was made toward performance goals for prior grant awards.
- **9c.** Financial reports are accurate for prior grant awards.
- **9d.** The Entity stayed on budget in prior periods.
- **9e.** The Entity received scheduled State monitoring site visit.
- **9f.** If the Entity received a site visit, was there 1 or more relevant findings?

**10. Program Complexity:**

- **10a.** This award requires the Entity to provide matching funds. [200.306]
- **10b.** This award requires accounting for program income. [200.80 and 200.307]
- **10c.** Maintenance of effort is required in this award.
- **10d.** Various types of program reports are required.
- **10e.** The Entity further subcontracts out the program.

**11. Program Experience:**

- **11a.** Is the Entity receiving this award for the first time? [200.331 (b) 1]
- **11b.** Does the Entity have prior experience with similar grant programs? [200.331 (b) 1]
- **11c.** Does the Entity meet the conditions of prior grant awards? [200.331 (b) 1]
- **11d.** Are there any known potential or identified Conflicts of Interest? [200.112]

**12. Key Program Personnel:**

- **12a.** Does the Entity have adequate, qualified, trained staff to comply with the agreement? [200.331 (b) 3]

**13. Other Program Factors. For the most recent year,**

- **13a.** There are new or substantially changed systems or software packages.
- **13b.** There are external risks including economic, political, regulatory changes or unreliable information.
- **13c.** There was a loss or suspension of a license, certification or accreditation to operate the program.
- **13d.** There are new activities, products or services.
- **13e.** The Entity has restructured, or been a party to a merger or acquisition.
<table>
<thead>
<tr>
<th>Score Key</th>
<th>Total Score</th>
<th>Risk Score</th>
<th>Recommended Monitoring Procedures</th>
</tr>
</thead>
<tbody>
<tr>
<td>Low risk</td>
<td>0-9</td>
<td>Complied with terms and conditions; No Known financial management problems or financial instability; High quality programmatic performance; Timely and accurate financial and performance reports; Entity has received some form of monitoring</td>
<td>Site visit for New Grantee prior to award, Report Review</td>
</tr>
<tr>
<td>Medium risk</td>
<td>10-20</td>
<td>No experience with program, Multiple Federal requirements not met, Turnover, Systems Changes, some history of not meeting financial or performance goals</td>
<td>Site Visit, Report Review. Require evidence of performance, additional financial reports, additional program reports, additional prior approvals. Determine if there are any OIG or other criminal investigations prior to award distribution. Conduct background checks to verify proper payment of withholding taxes, credit standing, review open OIG and inspection reports. Consider imposing special Conditions (2 CFR Part 200.207) such as (1) Requiring payments as reimbursements rather than advance payments, (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance, (3) Requiring additional more detailed financial reports, (4) Requiring additional project monitoring, (5) Requiring technical or management assistance, (6) Establishing additional prior approvals; Additional notifications apply 200.207(b) and (c).</td>
</tr>
<tr>
<td>High risk</td>
<td>21-63</td>
<td>History of unsatisfactory performance or failure to adhere to grant terms and conditions, financial management performance or instability, inadequate financial system, program has complex grant to manage, significant findings from audit, recurring unresolved issues, untimely inadequate inaccurate reports, lack of contact with any monitor, large award</td>
<td>Site Visit, Report Review. Require evidence of performance, additional financial reports, additional program reports, additional prior approvals. Determine if there are any OIG or other criminal investigations prior to award distribution. Conduct background checks to verify proper payment of withholding taxes, credit standing, review open OIG and inspection reports. Consider imposing special Conditions (2 CFR Part 200.207) such as (1) Requiring payments as reimbursements rather than advance payments, (2) Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance, (3) Requiring additional more detailed financial reports, (4) Requiring additional project monitoring, (5) Requiring technical or management assistance, (6) Establishing additional prior approvals; Additional notifications apply 200.207(b) and (c).</td>
</tr>
</tbody>
</table>
MENTI Live Survey Question 4
Code

What area of the risk assessment do **YOU** think are the most important?
What area of the risk assessment do YOU feel are the most important?
MENTI Live Survey Question 5
Code

Question & Answer
Follow Up & Contact Information

Jacqueline Thorne  
Maryland Department Of Transportation  
The Secretary’s Office  
7201 Corporate Drive  
Hanover, Maryland 21076  
410-683-6417  
jthorne@mdot.maryland.gov  
Linked In: Jacqueline Thorne