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| --- | --- |
| Agency/ Authority: | [Type Here] |
| Program: | [Type Here] |
| Funding Source: | [Type Here] |
| Recipient or Sub-recipient: | [Type Here] |
| Completed By: | [Type Here] |
| Date: | [MM/DD/YYYY] |

Note: This risk assessment tool may not include all relevant risk factors for your particular agency. Each agency should undertake a review to determine whether any additional risk areas should be reviewed, should identify those areas here, and should analyze them in accordance with the format of this tool.

1. **Risk Inquiry:** Organizational leadership, capacity, expertise, and experience managing and accounting for federal grant funds in general, and disaster recovery funds in particular.

**Rating Element:** Assess your agency's experience and staffing capacity to manage and account for federal grant funds and/or disaster recovery funds. Considerations include: your agency's organizational structure, supervisory roles, delegation of authority, line level staffing capacities, experience at all levels, and responsibilities and relations within and between different divisions or offices within your agency. Does your agency have a monitoring and oversight plan to assess your continued performance and compliance with federal and state laws and regulations? Does that plan include an assessment of internal controls, review of risks, threats and prevention and detection of fraud, waste, and abuse? How will your agency address risk areas and the need for corrective action?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Input from the individuals/units that will be disbursing funds or administering the program.

**Rating Element:** How will your agency plan for the use of the COVID-19 Recovery Funds? Does your plan include considerations for federal and state requirements and eligible uses of the funds? Does your plan establish adequate funding and staffing requirements for administering the funds? Is your plan consistent with your statutory mission and objectives? Does your plan include or contemplate the inclusion of input from line staff that are administering the program?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Review of existing internal controls and any identified weaknesses.

**Risk Element:** Has your agency reviewed its internal controls to ensure that policies and procedures are in place to satisfy federal and state laws and regulations? Are your agency policies and procedures adequate? Are they updated for all relevant processes required for the administration of the funds? Does your agency have a monitoring and oversight plan to assess your continued performance and compliance with federal and state laws and regulations? Does that plan include an assessment of internal controls, review of risks, threats and prevention and detection of fraud, waste, and abuse? How will your agency address risk areas and the need for corrective action?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Prior audits and audit findings.

**Risk Element:** Has your agency been audited in the past? Have you considered and addressed any prior audit findings and recommendations that may be applicable to your success in overseeing COVID-19 Recovery Funds?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Lessons learned from prior disasters.

**Risk Element:** Has your agency been audited after a previous disaster? Have you considered and addressed any findings and recommendations from such audit(s)?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Sub-recipient internal control weaknesses, if applicable.

**Risk Element:** If your agency is overseeing sub-recipients, have the sub-recipients been the subject of prior negative audit findings and recommendations that could impact oversight? How will your agency ensure that sub-recipients adhere to all requirements relating to their receipt of funds, including their use of funds and the reports they will be required to submit documenting their use of such funds?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Adequacy of financial, acquisition, and grants management policies and procedures, including technological capacity and potentially outdated financial management systems.

**Risk Element:** When is the last time there was an assessment of financial, acquisition, and grants management policies and procedures? Is technological capacity an issue? Are the financial management systems adequate or outdated? Have the systems been updated or can they be updated to function adequately for the administration of the COVID-19 Recovery Funds?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Barriers to reporting.

**Risk Element:** Does your agency have, or intend to develop, templates/forms or other documentation to report the results of the funding awards, including how your agency will respond to oversight bodies seeking to ascertain who received funds, the amount of funds, and the date funds were distributed?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Experience with state and federal procurement processes, value of anticipated procurements, and reliance on contractors to meet program goals and objectives.

**Risk Element:** Assess and evaluate your agency's procurement processes and experience with state and federal procurement requirements. Do you have a trained and qualified contract manager assigned to the contract? Do your contracts contain provisions to ensure that contracted vendors provide all necessary reports in the form/manner proscribed by contract? Have your contract templates been reviewed and checked for necessary state and federal contract language? If emergency contracts have been entered into, how do you plan to transition after the urgent need has ended? Do you have plans to conduct a cost analysis?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Potential conflicts of interests and ethics compliance.

**Risk Element:** Evaluate the means used to ensure that there is adequate separation of duties surrounding program funding requests and determinations. Does your agency have a code of conduct or policy describing measures to guard against potential conflicts of interest?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Amount of funds being disbursed to a particular category of sub-recipient and the complexity of its project(s).

**Risk Element:** Evaluate the guidance, policies and procedures, or other documents that are being used to ensure that your agency properly oversees the sub-recipients' use of funds, including those relating to internal recordkeeping, monitoring, and sub-recipient reporting. Does your agency have a plan to monitor sub-recipients' compliance with program requirements and those outlined in 2 CFR 200.331? Does that plan assess risk of sub-recipients? Does that plan include training and training documents? Have you prepared templates or other reporting forms that you will be providing to sub-recipients? Has your agency developed a plan to address sub-recipient noncompliance?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.

1. **Risk Inquiry:** Whether federal or state guidelines provide guidance regarding the uses of funds (i.e., discretionary vs. restrictive).

**Risk Element:** Evaluate how eligibility determinations will be made? Does your agency have written guidance or policies and procedures that provide direction in making and documenting eligibility determinations? Is the completeness and accuracy of information used in eligibility determinations verified? If so, how? By whom? Is there supervisory review and approval in this process?

**Summary Assessment/Description of Risks Identified:**

[Type Here]

**Risk Level (Low, Medium, High):** Choose an item.