



Division of Public Schools

2022-2023 Universal Risk Assessment Methodology for Subrecipients of Federal Grants

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Legal Authorities

Office of Management and Budget (OMB) Uniform Guidance (UG), Section 200.331(b) indicates that pass-through entities must “evaluate each subrecipient’s risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring...” As such, the Florida Department of Education (FDOE) is obligated to monitor its high-risk Local Educational Agency (LEA) sub recipients to ensure that Federal awards are spent properly and the subrecipient complies with all applicable Federal statutes, regulations, and grant terms and conditions. To comply with this requirement, a State Educational Agency (SEA) conducts an annual risk assessment of all subrecipients, including local educational agencies, to determine their potential risk of noncompliance. Based upon the outcome of the risk assessment, subrecipients are assigned a risk level of low, medium, or high.

High risk does not necessarily mean that an LEA is not performing the requirements of the program, Federal regulations, or administrative procedures. It means that an LEA may be at a higher risk of having program elements that could cause an LEA to not perform the activities aligned with Federal rules, regulations, and administrative procedures in a manner that keeps the LEA in compliance.

Universal Risk Assessment Federal Program Participants

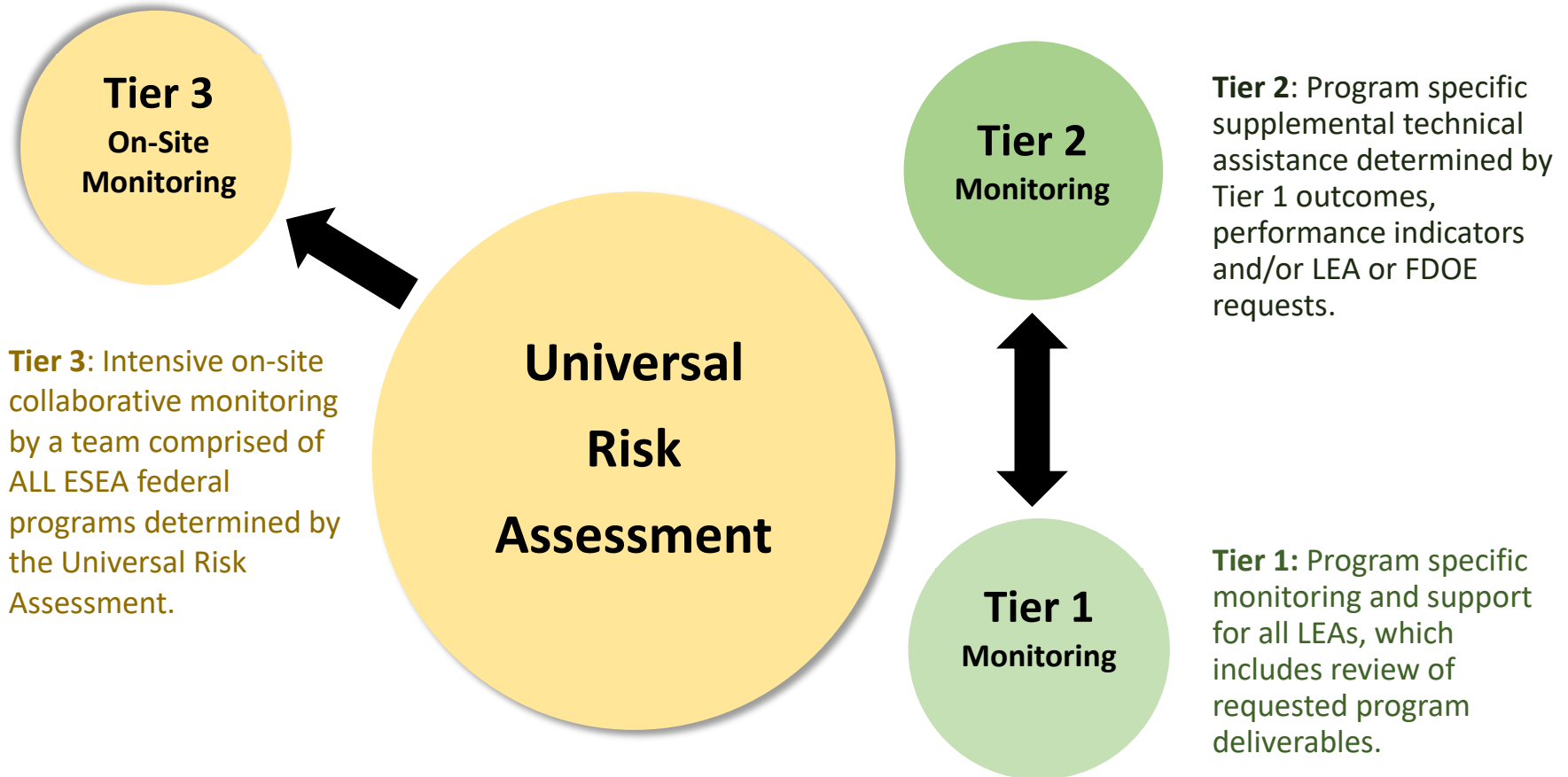
- Title I, Part A – Improving Basic Programs Operated by Local Educational Agencies
- Title I, Part C – Migrant Education Program
- Title I, Part D – Neglected & Delinquent Youth
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – English Language Acquisition, Language Enhancement and Academic Achievement
- Title IV, Part A – Student Support and Academic Enrichment
- Title V, Part B – Rural and Low-Income Schools

Universal Risk Assessment Goal

The overall goal of the Universal Risk Assessment is to identify LEAs that are high risk, who will receive Tier 3, intensive on-site monitoring. FDOE’s goal in monitoring is to help build the capacity of school districts so that they are aware of the requirements of the federal funds, have the ability to self-assess against the requirements of the grants, and understand how they can utilize funding under the grants to improve services for children. Monitoring is an opportunity to identify the supports LEAs need and to leverage federal funds in support of better outcomes for all students.

Universal Monitoring System

FDOE's Universal Monitoring System is designed to define a tiered support system to be used by all K12 ESEA Federal Programs. This system identifies the levels of tiered support provide to LEAs. The Universal Risk Assessment contains common performance and fiscal indicators to identify LEAs with high risk for on-site monitoring. Program specific monitoring will be provided for all LEAs and support will be customized based on need or request.



The Universal Risk Assessment accomplishes the following objectives:

- Identifies the areas that represent the highest degree of risk for an LEA;
- Identifies any “red flags” and/or serious problems as quickly as possible to support the immediate needs of the LEA;
- Assist FDOE staff to formulate a comprehensive plan for technical assistance purposes; and
- Provide tools for FDOE staff to develop resources and deliver technical assistance services to meet unique needs of LEAs.

Definitions

Risk – Is the chance that something will happen that will adversely impact the likelihood of achieving expected results.

Risk Level – A measurement of the potential impact on the Federal award from a negative event or outcome.

Risk Assessment – Risk assessment is an element of internal control within the risk management process that allows management to identify and assess key risks to achieving its objectives. In regards to compliance, a risk assessment measures two quantities: (1) magnitude of the potential non-compliance, and (2) probability that the non-compliance will occur. The overall risk assessment determines frequency of monitoring and depth of monitoring.

Universal Risk Assessment Indicators

1. **Percent of Active Schools in the District Identified for Comprehensive Support & Improvement (CSI) (most recent school year available):** Schools are identified for CSI based on their Federal Percent of Points Index. A higher percentage of CSI schools within the LEA may indicate lower student academic performance.
2. **Percent of Active Schools in the District Identified for Targeted Support & Improvement (TSI) (most recent school year available):** Schools are identified for TSI based on their Federal Percent of Points Index. A higher percentage of TSI schools within the district may indicate lower student academic performance.
3. **Total Allocation of Federal Grants, Current Fiscal Year:** An LEA with a larger award poses a greater risk to the overall Federal award than does an LEA with a smaller award, as issues of non-compliance could result in greater financial consequences.
4. **Total Number of Federal Grants Received, Current Fiscal Year:** LEAs with more grants to manage may pose greater risk, depending on the LEA’s internal controls.
5. **Percent of Unexpended Federal Funds (most recent fiscal year available):** A large percentage of unexpended funds for a given fiscal year may indicate that the LEA did not provide the full scope of services as described in its approved grant application.
6. **Timeliness of Grant Application and Report Submissions (most recent fiscal year available):** The timeliness of an LEA’s grant application and report submissions can indicate the quality of its internal controls.
7. **Percent of School-Level Federal Funds:** The more an LEA depends on Federal funds to provide services to its students, the more at-risk those services could be if Federal funding is reduced or administered ineffectively.

2022-2023 Universal Risk Score Rubric

#	Indicator	Low Risk Value	Medium Risk Value	High Risk Value	Low Risk Criteria	Medium Risk Criteria	High Risk Criteria	Data Source
1	Percent of Schools in the District with Comprehensive Support & Improvement (CSI) Status *	5	10	15	Less than 10%	10% - 19.99%	20% or more	2022-23 Federal Index and ESSA Support Categories, by School as of July 18, 2022
2	Percent of Schools in the District with Targeted Support & Improvement (TSI) Status *	3	6	10	Less than 50%	50% - 69.99%	70% or more	2022-23 Federal Index and ESSA Support Categories, by School as of July 18, 2022
3	Total Allocation of Federal Grants, FY 2022-23	5	10	15	Less than \$3 million	\$3-10 million	More than \$10 million	Sum of preliminary 2022-23 Federal grant allocations for 7 programs within the consolidated application
4	Total Number of Federal Grants, FY 2022-23	3	6	10	3 grants or less	4 to 5 grants	6 -7 grants	Number of Federal grants per district for 2022-23 within the consolidated application
5	Percent of Unexpended Federal Grant Funds (2021-2022)	5	10	15	10.00% or less	10.01% - 20.00%	20.01% or more	Sum of unexpended funds from 2020-2021 FLAGS detail reports for 7 grants within the consolidated application as of July 28, 2022
6	Timeliness of Grant Applications, FY 2022-23	3	6	10	90% to 100% on time	80% to 89.99% on time	Less than 80% on time	Timeliness of grant applications for 2022-23 fiscal year as indicated on internal ShareFile Tracker as of August 2, 2022
7	The LEA's average school-level percentage of federal funds comprising the total per-pupil expenditure amount.	3	6	10	Less than 7%	7.00% - 8.99%	9% or more	2020-21 School per-pupil expenditures report as of August 8, 2022

*(most recent available)

Overall Risk Score and Monitoring Determination

The individual scores of each of the above risk indicators are added together to determine the composite risk score for each LEA. The LEA's composite score is then used to determine an overall risk level of Low, Medium, or High. LEAs with composite score of 66 to 100 are determined to have a High level of risk and may be selected for Tier 3 intensive on-site collaborative monitoring by a team comprised of FDOE representatives from all ESEA Federal programs. Regardless of an LEA's risk score, FDOE reserves the right to provide Tier 3 monitoring and support, if necessary. FDOE will determine what specific monitoring activities will be conducted based on available resources.