

Carl D. Perkins Risk-Assessment Guidelines



OFFICE OF CAREER-TECHNICAL EDUCATION

JUNE 2020

Perkins Preliminary Risk-Based Assessment Review

THE RISK ASSESSMENT REQUIREMENT

The Ohio Department of Education's Office of Career-Technical Education will perform on an annual basis a risk assessment for all Career-Technical Planning Districts prior to the grant awards. In accordance with guidance outlined in the OMNI 2CFR 200 Part D Post Federal Award Requirements – Sub Recipient Monitoring and Management section §200.331 Requirements for Pass-Through Entities, the state must use a risk-based approach to monitor sub-recipients.

The state administers the Perkins Risk-Based Assessment reviews to measure the effectiveness of the Perkins grants. Based on the results of the risk assessment, all districts will be categorized as low, medium or high risk. The risk-based assessment process is designed to conduct a more thorough review for Perkins recipients with higher risk factors.

The following are the criteria used to determine the risk level of subrecipients for the 2020-2021 school year:

Risk factors will include:

- Compliance with the 12/8 rule for size and scope,
- Single audit findings,
- Percentage of noncompliant program pathways, and
- Failure to meet stated deadlines.

A high-risk assessment does not necessarily mean a district is not meeting the requirements of the program, federal regulations or administrative procedures. The risk-based assessment review is a process to identify potential problems that could lead to risks in the accountability, fiscal accounting and grant operations.

Note: Fiscal Year 2021 districts identified as high risk will receive a caution notification. FY21 high-risk districts are subject to additional technical assistance.

Pre-Award Risk-Based Assessment Process

Pre-Award Risk-Based Assessment Tool

The following Pre-Award Risk-Based Assessment Tool will be used to determine each district score. The districts with scores between 0 to 3 points will be low risk. The districts with scores ranging from 4 to 6 points will be medium risk. The districts with scores of 7 and above will be high risk. The risk assessment criteria include risk factors that help identify changes critical to assessing the districts' risk levels. See chart below:

Risk Based Assessment Tool Risk Factors		Weighting
1. Submission of budget revision by May 31 deadline.		1
2. Submission of Final Expenditure Report (FER) by September 30 deadline.		1
3. *Size, Scope, & Quality (12/8 Rule).		3
4. Percentage of Noncompliant program pathways		*Range 0-3
5. Single Audit Findings		**Range 0-4
Total Pre-Assessment Score		
*Range		**Range
< 51%	0	Unresolved Prior Year Finding 4
51% - 70%	1	Finding of Noncompliance/Other Material Finding 3
71% - 90%	2	Weakness in Internal Controls 2
91% - 100%	3	Resolved Prior Year Finding 1

Identifying High Risk Districts

Once a district is identified as high-risk, the education program specialist will monitor the district based on the Monitoring Guidelines Risk Levels in the chart below:

Risk Level	Monitoring Guidelines Risk Levels
Low (0- 3)	No known programmatic, financial instability or significant audit findings. No significant program changes. The district shall receive technical assistance upon request.
Medium (4 - 6)	Required to receive additional targeted assistance. Required interviews of key staff, either by telephone, or on-site as determined by education program specialist. Required attendance at trainings/conferences. May be required to submit performance improvement plan. Follow-up with district via phone audit review.
High (7 and higher)	May be required to submit detailed financial reports such as general ledgers, supporting documentation and performance reports. May be required to submit performance improvement plan for approval by the department. On-site monitoring will be at the discretion of the education program specialist.

Notification of On-site Review

The state will notify an institution selected for monitoring within 30 days in advance of the risk review. This notification will include an agenda and the documents required to be available for the review. To prepare for an on-site visit, the district may be asked to provide additional evidence. The reviewer will consult with the district and provide a list of items required during the on-site visit.

Tools and Resources

Legislative Guidelines

Strengthening Career and Technical Education for the 21st Century Act (Perkins V) (Click [here](#))

Education Department General Administrative Requirements (EDGAR) (Click [here](#))

Federal Uniform Grant Guidance-Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards (Click [here](#))

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