



Ohio

Carl D. Perkins Risk-Assessment Guidelines

OFFICE OF CAREER-TECHNICAL EDUCATION

REVISED MARCH 2019

Perkins Risk-Based Assessment Review

THE NEW 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 recent 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 2019-2020 school year:

Risk factors will include:

- Previously non-compliant,
- Failure to meet 90% of the negotiated target for accountability measures, 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 2020 districts identified as high risk will receive a caution notification. FY20 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 2 points will be low risk. The districts with scores between 3 to 5 points will be medium risk. The districts with scores between 6 to 7 points 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 Factor	Point Value
1. District failed to meet at least 90% of the negotiated target for Technical Skill Attainment (2S1).	No = 0 Points Yes = 2 Points
2. District failed to meet at least 90% of the negotiated target for Post-Program Placement (5S1).	No = 0 Points Yes = 1 Points
3. Submission of Corrective Action Plan (CAP) evidence by June 1	No = 2 Point Yes = 0 Points
4. Submission of May 31 budget revision by deadline.	No = 1 Point Yes = 0 Points
5. Submission of Final Expenditure Report (FER) by deadline.	No = 1 Point Yes = 0 Points
Total Pre-Assessment Score	

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 (0-2)	No known programmatic, financial instability or significant audit findings. No significant program changes. The district shall receive technical assistance upon request.
Medium (3-5)	Required to receive additional targeted assistance. Required attendance at trainings/conferences. Follow-up with district via phone audit review.
High (6-7)	Required to submit detailed financial reports such as general ledgers, supporting documentation and performance reports. 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
<ul style="list-style-type: none"> •Carl D. Perkins Career and Technical Education Improvement Act of 2006 http://fldoe.org/core/fileparse.php/3/urlt/perkins_iv_text.pdf •Education Department General Administrative Requirements (EDGAR) http://www.ed.gov/policy/fund/reg/edgarReg/edgar.html •Federal Uniform Grant Guidance (Uniform Administrative Requirements, Cost Principles, and Audit Requirement for Federal Awards) https://www.whitehouse.gov/omb/grants_docs

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