

Carl D. Perkins Risk-Assessment Guidelines



**Department of
Education &
Workforce**

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Perkins Preliminary Risk-Based Assessment Review

THE RISK ASSESSMENT REQUIREMENT

The Ohio Department of Education and Workforce - Office of Career-Technical Education conducts an annual risk assessment for all Career-Technical Planning Districts (CTPDs). This process aligns with the requirements outlined in 2 CFR 200.332, which mandates a risk-based approach to monitoring sub-recipients. The assessment ensures effective resource management and compliance with federal regulations and supports the success of career-technical education programs.

The Administrative Field Services team performs Perkins Risk-Based Assessment reviews to evaluate the effectiveness of Perkins grants. Districts are categorized as **low**, **medium**, **high**, or **severe risk** based on assessment results, which aids in targeted monitoring and support.

RISK ASSESSMENT FACTORS AND CRITERIA

The risk assessment evaluates key areas impacting a CTE program's continuity, effectiveness, and financial stability. The factors include leadership turnover, unspent funds, timely submission of required reports, compliance with program quality standards, achievement of performance targets, and audit findings. Each factor is evaluated based on specific criteria to determine which areas need extra support.

Risk Assessment Criteria and Scoring Table

Risk Factor	Risk Criteria	Scoring Range
1. Leadership turnover rate	Leadership turnover within a fiscal year. One point for every staff turnover.	0-3
2. Unspent Funds	Percentage of Perkins funds that the district has spent. 90–100%: 0 pts; 75–89%: 1 pt; <75%: 2 pts	0-2
3. Submission of Final Expenditure Report (FER)	FER submitted after the September 30 deadline.	0-1
4. Compliance with program quality standards (12/8 Rule)	Non-compliance with program quality standards. One point for each year non-compliant.	0-3
5. Submission of Comprehensive Local Needs	Late submissions of Comprehensive Local Needs Assessment (CLNA) and	0-3

Assessment and/or Local Application	Local Application. One point for each year non-compliant.	
6. Achievement of Perkins performance targets	Not meeting 90% of performance targets indicates an opportunity for improvement in the program. One point for each year non-compliant.	0-2
7. Single Audit Findings	Results from state audits.	0-4

Pre-Award Risk-Based Assessment Process

The final risk level scores will determine each district's level of technical assistance. Districts with scores between 0 and 5 points will be classified as **low risk**. Districts with scores ranging from 6 to 10 points will be classified as **medium risk**. Districts with scores ranging from 11 to 15 points will be classified as **high risk**. Districts with scores of 16 or higher will be classified as **severe risk**. The risk assessment criteria include factors that help identify changes critical to assessing the districts' risk levels.

Once a district is identified as a risk, the education program specialist will monitor the Career-Technical Planning District according to the Monitoring Guidelines Risk Levels outlined in the chart below:

Risk Level Intervention Framework

Risk Level	Risk Level Intervention Framework
Low (0-5)	- General oversight only. - Technical assistance available upon request. - No mandatory corrective action or monitoring. - Encouraged to participate in training or professional development
Medium (6-10)	- Required participation in targeted technical assistance (TA) activities (e.g., focused webinars, regional support). - Phone interviews with CTE Director or fiscal lead. - Required follow-up documentation review (FERs, budgets, etc.).
High (11-15)	- Submission of general ledger reports, budget documentation, and student outcome data. - Detailed fiscal and programmatic documentation required for review. - Quarterly check-ins to review progress and confirm improvements. - On-site monitoring may be scheduled at the discretion of the state education agency.
Severe Risk	Immediate corrective action plan (CAP) required and subject to approval.

(16 and higher)	• Intensified fiscal review, including invoices, time & effort reports, and procurement records. • Monthly reporting and progress documentation required. • Mandatory on-site monitoring with state staff and leadership engagement. • Potential temporary suspension or redirection of Perkins funds.
	Substantial improvement must be demonstrated, defined as: • Meeting at least 90% of performance targets. • Resolving prior audit or compliance findings. • Submitting required documents on time. • Fully implementing an approved PIP with sustainable outcomes. • Demonstrating long-term system or process changes that reduce future risk.

Notification of On-site Review

The state agency will provide formal written notification to the district selected for an on-site monitoring review at least 30 days before the scheduled visit. This notification serves several key purposes:

- Informing the district of its selection for monitoring.
- Clarifying the scope and purpose of the on-site review.
- Outlining the review agenda, including dates, times, and key focus areas.
- Listing documents and evidence that must be made available in advance or during the review.

The monitoring agenda will typically include scheduled interviews or meetings with relevant personnel, classroom or program observations (if applicable), and time blocks for document review and clarification discussions. In addition, the agenda may include:

- Entrance conference with district leadership and key staff
- Fiscal review sessions focused on Perkins-funded expenditures
- Review of student eligibility, participation, and performance data
- Facilities or equipment walkthroughs, especially for capital asset purchases
- Review of local needs assessment implementation and program alignment

DOCUMENT PREPARATION AND EVIDENCE REQUESTS

Along with the notification letter and agenda, the state will provide a preliminary list of required documents the district must compile for review. These may include, but are not limited to:

- Approved local application and budget (Perkins V)
- Time and effort documentation for funded personnel
- Inventory lists and purchase receipts for equipment.
- Travel documentation (itineraries, agendas, proof of attendance)

- Contracts, MOUs, or agreements with partners.
- Documentation of committee meetings engagements.
- Data Supporting Student Performance Indicators.
- Evidence of program of study implementation.

To ensure a smooth and efficient on-site visit, the district may be required to submit specific documents in advance through a secure online portal or via email. These documents may include PDFs, spreadsheets, and scanned copies of receipts or sign-in sheets.

CONSULTATION AND PRE-VISIT COMMUNICATION

The assigned program specialist will consult with the district in the weeks leading up to the review to:

- Answer any questions regarding the notification or required materials
- Clarify the scope of evidence needed based on the district's risk profile
- Confirm logistics (location, review room, access to technology or internet)
- Schedule interviews or classroom observations
- Provide technical assistance to ensure document readiness

During these conversations, the program specialist may request additional documentation based on the district's specific programs, recent performance, prior monitoring results, or use of Perkins funds.

SUGGESTIONS FOR DISTRICT PREPARATION

To prepare effectively for the on-site review, the district should:

- Assemble a team of staff familiar with Perkins-funded programs, fiscal management, and compliance requirements.
- Organize documents in labeled folders (digital and/or print) aligned with the agenda.
- Prepare explanations for any costs questioned or unusual expenditures.
- Ensure staff availability for interviews and document walkthroughs.
- Review the most recent local needs assessment, improvement plans, and prior monitoring feedback.

High-Risk Designation for Perkins Monitoring Comprehensive Review Requirements

Any district that receives a score in the **high-risk or severe-risk** category based on the Perkins Risk Assessment will automatically be selected for a Comprehensive Review as a part of the annual Perkins V monitoring cycle.

As part of this Comprehensive Review, the district is required to:

- Respond to a series of compliance-related questions covering stakeholder engagement, continuous improvement, fiscal accountability, and required uses of funds.
- Upload supporting documentation aligned with each survey question, including financial records, meeting materials, time and effort documentation, program improvement plans, and evidence of alignment with the CLNA.

This review ensures appropriate corrective actions and technical assistance are provided to support compliance, improve outcomes, and mitigate future risks.

Appendences

MONITORING RISK FACTORS AND DATA COLLECTION SUMMARY

Seven risk factors are evaluated annually using state data sources to ensure equitable and informed monitoring of Career-Technical Education (CTE) programs. Each risk factor is assigned a **raw score** based on predefined compliance conditions or performance thresholds. These scores are then multiplied by **pre-assigned weights** to generate a total **weighted risk score** to determine the district's risk level and appropriate technical assistance response.

Risk Factor	Data Collection Source	Weight	Notes
Leadership Turnover Rate	Annual staffing survey report and self-assessments	1.0	Each instance of turnover contributes to the overall score. Note: All districts will receive a score of 0 in this category for FY2025. Beginning with FY2026, the department will collect turnover data to determine future risk scores.
Unspent Perkins Funds	Final Expenditure Reports (FER), carryover and use of Indirect Cost reports, and fiscal dashboards	1.2	Assesses the percentage of Perkins funds expended. Underutilization may indicate planning or implementation issues.
Final Expenditure Report (FER) Submission	FER log and system timestamps	1.0	Late submissions receive a raw score of 1.
Compliance with Program Quality Standards (12/8 Rule OAC 3301-61-03(B))	Prior year's career-technical program data	1.5	Districts receive one point for each year of noncompliance.

Submission of CLNA and Local Application	Timestamp logs	1.2	Each late submission year results in a score of one point. A district with two or more late submission years is classified as high-risk.
Achievement of Perkins Performance Targets (Perkins V Act Section 123(b))	State data dashboards	1.5	Districts receive a score depending on the number of years below the threshold.
Single Audit Findings	State and federal audit results	2.0	Districts receive a score depending on the nature of findings—from 1 (resolved prior finding) to 4 (unresolved or material noncompliance).

Perkins Risk Assessment: Weighted Scoring Matrix

Risk Factor	Raw Score Range	Weight	Weighted Score Range	Rationale
Leadership Turnover Rate	0–3	1.0	0–3	Moderate program disruption
Final Expenditure Report Submission	0–1	1.0	0–1	Compliance deadline issue
Program Quality Standards (12/8 Rule)	0–3	1.5	0–4.5	Tied to federal performance expectations
CLNA and Local Application	0–3	1.2	0–3.6	Essential for Perkins planning and compliance
Performance Targets	0–2	1.5	0–3	Key indicator of student and program success
Single Audit Findings	0–4	2.0	0–8	Significant financial risk or noncompliance

Resources

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

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