



Wyoming Adult Education SEA: Wyoming Community College Commission

Policy #4092020: Risk Assessment

Part I: Purpose

Per 2 CFR 200.331(b), the Wyoming Community College Commission (WCCC), must conduct a risk assessment at the beginning of each program year, using established criteria, to evaluate each grantee's risk for the purpose of determining a monitoring plan. It is important to note that a grantee deemed high risk should not be interpreted as a negative reflection of the grantee.

The primary purpose of the Risk Assessment is to provide a framework for State staff to effectively monitor potential risk factors associated with grants funded by federal pass through agencies to sub-recipients. The focus is to ensure that grant programs meet the following requirements:

- (1) Adhere to the grantor's guidelines and agreements
- (2) Remain within budget
- (3) Are able to carry out the scope of service, and
- (4) Ensure that proper internal controls are in place

Part II: Process

At the beginning of each program year, WCCC will score the below elements for each grantee. Each grantee will receive a copy of their results once it is completed.

Per the Workforce Innovation and Opportunity Act (WIOA) Wyoming State Plan, WCCC will conduct on-site or virtual reviews of each local provider on a two year cycle. Programs determined to be higher risk will receive on-site reviews first. Every grantee will receive a review during each two-year cycle, however grantees whose risk assessment places them in a high risk category, will receive more frequent on-site or virtual reviews. This means that a grantee may receive more than one review during a two-year grant cycle.

All grantees, regardless of whether or not they are receiving a review, will be monitored monthly for data quality, provide a quarterly progress update, submit an Annual Performance Report, and be required to submit a or continuation, application in non-competition years.

Grantees receiving an on-site or virtual visit may be required to submit additional interim financial reports and/or receive additional monitoring calls from the Wyoming State Director for Adult Education.

Section One: New Awards (Year One of Grant Cycle)			
Finance		Yes (True)	No (False)
1	Program has received AEFLA funding in the previous fiscal year.		
2	The AEFLA and/or IELCE grant award(s) total less than \$250,000.		
3	WCCC has not been notified by other entities (state/federal grant managers, partner agencies, auditors, staff employed by the program, etc) of potential risks with this provider.		
4	Budget and planning reflect 17% or more in match funds.		
5	Other than WIOA Title II, does the Agency have experience in managing other federal, state, local, or private funds?		

Program		Yes (True)	No (False)
1	The program has not had a new director within the last year.		
2	The program has not added new services (for example, corrections, IET, ESL)		
3	Program has not seen a 25% or higher turnover in staff within the last year.		
4	The program has been existence for more than 3 years.		
5	The program has outlined a clear three-tiered professional development plan for staff.		
Performance			
1	Program proposal or continuation application did not need to be altered after the competition and/or a State imposed Strategic Action Plan was not required of the applicants to address significant components from the RFP that were not clearly addressed in the competition.		
2	Program submitted four years of data showing EFL gains for the competition.		
3	LACES program performance for the past two years reflects an average of at least 50% in participant educational functioning level gains across the two year period.		
4	Program application described successes in placing students into employment and/or into post secondary education/training programs.		
5	At least 90% of instructors have completed trainings on how to conduct TABE and/or BEST assessments, as evidenced by documents submitted during the competition.		
	Total		
	13-15: Low risk		
	12-13:Medium Risk		
	0-11: High Risk		
	Section Two: Non-competitive Grant Years		
Finance		Yes (True)	No (False)
1	Organization has received the Adult Education Federal and/or State grant funds for 3 years of more.		
2	At least 90% of drawdowns in the year were submitted by their due date.		
3	Budget revisions were submitted in a timely manner.		
4	Program tracks cost per student on Federal and State funds.		
5	Program has a history of returning more than \$5,000 of unexpended funds at the end of the year over the past three years.		
6	Program accounts for expenditures in the correct cost categories and in alignment with an approved budget.		
7	Program is funded at the top or in the middle quartile.		
8	Program's Adult Education department has had a monitoring in the last 5 years.		
9	During the last monitoring visit, the program was free of findings.		
10	There was a 25% decrease in funding levels from the previous year.		

Staff Change, Attendance, Professional Development		Yes (True)	No (False)
1	The program has maintained at least 70% of key program personnel within the past year.		
2	Program has identified staff needs for professional development and has addressed these needs at the local, state, and national level.		
3	At least 80% of program staff attended the Summer/Fall State supported professional development trainings.		
4	Director and/or other key personnel have participated in State supported LACES trainings.		
5	Key personnel have participated in State supported CommunityPro trainings.		
Performance			
1	Program has met the overall performance for educational functioning levels over the past three years.		
2	Program has met the State post testing target of 60% in the past year.		
3	Monthly performance reports (desk audits) have been submitted by the due date.		
4	Quarterly reports and progress towards goal reports were submitted by their respective due dates.		
5	LACES data is input in a timely fashion.		
6	Data is reviewed at least monthly to ensure the validity of data.		
7	Program conducts national data sweeps for enrollments in post secondary education/training.		
8	Program collects follow up data as required for students who do not provide a social security number AND this information is recorded into the student's LACES record.		
9	Program enrolls students into Career Services course according to State guidelines.		
10	Program is an active participant in the local One-Stop AND with Next Generation Sector Partnerships.		
	Totals		
	23-25: Low risk		
	20-22-:Medium Risk		
	0-19: High Risk		
Comments			