![TPCB Transportation Planning Capacity Building]

Federal Grant Management: Effective Practices for Administering Funds from State DOTs, through MPOs, to Local Agencies and other Sub-Recipients

A TPCB Peer Exchange Event

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National Peers:	Matthew Arancio, Vermont Agency of Transportation (VTrans) James Kuehn, Wisconsin Department of Transportation (WisDOT) Elizabeth Larsen, Southeastern Wisconsin Regional Planning Commission (SEWRPC) Thomas Caiafa, Georgia Department of Transportation (GDOT) John Orr, Transportation Access and Mobility Group, Atlanta Regional Commission (ARC)
Sponsoring Agency:	Federal Highway Administration (FHWA)

U.S. Department of Transportation
Federal Highway Administration

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13. ABSTRACT (Maximum 200 words)

This report summarizes proceedings of a virtual peer exchange sponsored by the Federal Highway Administration (FHWA) and hosted by the New Jersey Department of Transportation on June 28-29, 2022. The purpose of the peer exchange was to discuss the topic of Federal grant management, particularly effective practices for administering funds from State departments of transportation (State DOTs), through metropolitan planning organizations (MPOs), to local agencies and other sub-recipients. The event provided an opportunity for State DOTs from across the U.S. to share experiences, lessons learned, successes, and challenges related to the topic. Specifically, participants discussed pre-award capacity analysis and risk assessment, subaward agreements, sub-recipient monitoring, tools for tracking funding, and regulations related to grant management. The event was sponsored by FHWA through its Transportation Planning Capacity Building Program, led in partnership with the Federal Transit Administration.

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Contents

Peer Exchange Overview

This report highlights the presentations, discussions, and key takeaways from the "Federal Grant Management: Effective Practices for Administering Funds from State DOTs, through MPOs, to Local Agencies and other Sub-Recipients" virtual peer exchange, held over two half-days on June 28-29, 2022. The event was sponsored by the Federal Highway Administration (FHWA) through its Transportation Planning Capacity Building (TPCB) program, led jointly with the Federal Transit Administration. The event was held at the request of the New Jersey Department of Transportation (NJDOT) to bring together peers from across the country to discuss their experiences in the administration of Federal planning grants. About 40 participants attended the event, representing peer State Departments of Transportation (State DOTs), metropolitan planning organizations (MPOs), along with representatives from FHWA and FTA; and other transportation partner agencies from the peer States. The peers included the Vermont Agency of Transportation (VTrans) and FHWA Vermont Division, Georgia Department of Transportation (GDOT) and Atlanta Regional Commission (ARC), and Wisconsin Department of Transportation (WisDOT) and the Southeastern Wisconsin Planning Commission (SEWRPC).

During the peer exchange, each State's peer pairing presented on the following topics after a "lightning round" of peer introductions and overview presentations on recent grant management practices: *Pre-Award Capacity Analysis & Risk Assessment* (GA), *Subaward Agreements* (VT), and *Sub-recipient Monitoring* (WI) for a total of four main sessions. Each session ended with a facilitated discussion, and the peer exchange closed with a breakout session focused on next steps as participants shared what they learned and what they would take back to their respective agencies.

Session Discussions

Opening Remarks

Representatives from the FHWA Office of Planning, the FTA Office of Planning, and NJDOT provided opening remarks, recognizing that the purpose of this peer exchange is to share information about the administration of Federal planning grants with a goal of better understanding the roles and responsibilities of pass-through entities, recipients, and sub-recipients. NJDOT described the State's history of collaboration with its MPOs and emphasized nurturing those partnerships. NJDOT recognized the challenges of administering FHWA funds and noted that the peer exchange provides a unique opportunity to identify best practices for funds administration processes.

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The FHWA noted that the [TPCB website](#) hosts a variety of other valuable resources for the transportation planning community, including summary reports from TPCB peer exchanges, case studies, and past research.

After opening remarks, an introductory "icebreaker" poll was administered asking participants to share one goal they had for the peer exchange. The respondents provided a variety of goals, ranging from broad interest in others' practices to individual regulatory requirements, but most were focused in four areas: learning new information, understanding existing components, improving practices, and connecting with other peers through meaningful discussion. Below are examples of the goals shared by participants at the start of the peer exchange:

> *"I would just like to gain more understanding of the whole grant administration process in general and the relationship between recipients and sub-recipients."*

> *"…to better understand Federal requirements for FHWA funded planning studies."*

> *"Connect and learn more from colleagues!"*

> *"How to identify risk earlier"*

Respondents were also asked to provide one question they hoped to have answered during the peer exchange, which predominately reflected the themes captured in responses to the prior question regarding goals. However, questions focused on the participants' desires to avoid procedural and regulatory pitfalls in the Federal grant administration process. Examples of these questions included:

> *"What isn't working for folks right now?"*

> *"Do Federal requirements differ for planning funds vs. pass-through funds for design & construction?"*

> *"Does someone have a better way to provide subrecipient oversight?"*

Introductions, Overviews, and Presentations[1]

FHWA New Jersey Division and NJDOT Overview

The FHWA New Jersey Division reviewed the regulations of Title 23, Title 49, and Title 2 applicable to Federal grant management, particularly [23 CFR 420](#) covering the program administration of FHWA metropolitan planning and research funds as well as . The FHWA Division also discussed formula funding authorized under [23 U.S.C. 104(f)](#) to carry out the provisions of [23 U.S.C. 134](#), and provided guidance for the regulations governing corridor and sub-area planning studies ([23 CFR 450.318](#)). The FHWA Division described the procedures required of State DOT and sub-recipients in retaining approval for budget and programmatic changes, items of allowable cost under the cost principles, and contractual obligations outlined in 49 CFR 18-19, though it was noted that these Chapters had been absorbed into [2 CFR 200](#)

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[1] References to various tools in this report do not represent an endorsement. FHWA recognizes that many tools are available and encourages agencies to use the tools that work best for them.

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while 23 CFR 420 had not been updated in quite some time. The State DOT reporting and monitoring requirements and fiscal requirements for Federal awards of 2 CFR 200 were covered at length to refresh and improve the participants' statutory knowledge ahead of the focused sessions.

A short discussion followed concerning the funding process itself: delays in authorization due to sub-recipient turnover and other causes of decreased capacity; consultant invoicing; and the percentage of PL funds that are passed on to subregions, which NJDOT reported as between 15-20%.

Lightning Round

As part of the agenda for the peer exchange, each of the peer pairings provided a brief "lightning round" introductory overview to their State DOT and MPOs.

Wisconsin

The Wisconsin Department of Transportation (WisDOT) described its internal organizational management structure, its foci (e.g., planning, transit, local roads), and corresponding staff. WisDOT outlined the planning and State planning and research (SPR) funding processes to its 14 MPOs receiving PL funds and 8 RPCs receiving SPR funds. WisDOT administers grants to 76 public transit systems and 8 FTA-subsidized Intercity Bus Program Section 5311(f) routes. WisDOT also introduced its Federal-only Transportation Alternatives Program (TAP) and Congestion Mitigation and Air Quality (CMAQ) Program emphasizing safety for non-drivers and emission reduction benefits.

The Southeastern Wisconsin Regional Planning Commission (SEWRPC) introduced its area-wide planning activities as one of Wisconsin's 8 RPCs. SEWRPC's 67 employees make up the RPC for the state's 7 southeastern counties and an MPO for five urbanized areas.

Georgia

The Georgia Department of Transportation (GDOT) presented on its planning services contracts and PL funding process. GDOT described the State's 16 MPOs (minus 3 in the Atlanta-area under the jurisdiction of ARC) and its federally funded Unified Planning Work Programs (UPWPs), 5 of which are designated as Transportation Management Areas (TMAs) with Urbanized Area populations of 200,000 or greater. As of 2016, the MPOs' unused PL funds are returned to the State's apportionment "pot" for redistribution for any MPO to use towards planning. Funding requests from the MPOs are reviewed semi-annually by the Georgia Association of Metropolitan Organizations (GAMPO) PL Funds Review Committee consisting of voting MPO members and non-voting GDOT and FHWA members.

Vermont

The FHWA Vermont Division outlined the State's one MPO (Chittenden County Regional Planning Commission [CCRPC]), and 10 SPR-funded RPCs. The CCRPC is a non-TMA, non-pass-through entity, as would-be sub-recipients work directly for the strictly PL-funded MPO. VTrans provides Transportation Planning Initiative (TPI) guidance to the RPCs each year, offering mid-year reviews and checkpoints as outlined in its grant agreements with VTrans. The sole MPO and limited number of RPCs are reviewed by four staff members at VTrans, increasing interactions between partners and allowing for a "personal touch."

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Pre-Award Capacity Analysis & Risk Assessment

The FHWA Office of Planning provided introductions for this session and peers from ARC opened this session with a short presentation detailing its organizational profile as an MPO (one of the 3 Atlanta-area MPOs in Georgia), ARC's role in executing and funding planning contracts, and how ARC determines and documents both sub-recipient capacity and risk.

Notable Takeaways

- **John Orr, Manager, Transportation, Access, and Mobility Group, (ARC)**
    - ARC's work, like that of many MPOs, impacts the daily lives of many community members: in Atlanta's case, the planning area includes all or parts of 20 counties, 100 cities, and 6 million people. Planning for capital improvements requires not only large financial investments, but dependable partners to handle funds effectively and efficiently in their execution of contracted work.
    - To determine sub-recipient capacity, granting entities may benefit from assessing organizational and staff capacity, reviewing sub-recipient contracting policies and procedures, and identifying non-Federal match sources. This can be accomplished through a "desk audit" investigating the sub-recipients' internal financial controls, including their history of handling Federal funds. Securing external controls, such as the support of local senior management should issues arise, provides additional reassurance to partners.
    - Local governments may make numerous requests per year for studies, which puts pressure on the MPO. This pressure can be alleviated by the requirement of a letter of commitment from a governing body supporting both the project and the local match.
    - The MPOs' standard operating procedures for procurement and contracting, such as an implemented "checklist" for reviewing sub-recipient capacity and risk, keeps these reviews compliant, consistent, and as objective as possible.

Post-Presentation Discussion

Following the presentation from ARC, FHWA facilitated a discussion focused on methods for determining sub-recipient risk and capacity as well as creative solutions to resolve deficiencies in these areas, including tools and trainings. This discussion featured a polling question (Figure 1) asking participants about their experiences assessing local capacity or past performance when awarding competitive grants. The respondents were given the choice of four answers:

1. Yes, BOTH local capacity and past performance are considered
2. Yes, past performance is considered but not local capacity
3. Yes, local capacity is considered but not past performance
4. No, neither are considered

The results of the poll are shown in Figure 1. Most respondents, 94 percent, selected answer 1. The remaining 6 percent selected answer 2. No one selected answer options 3 or 4.
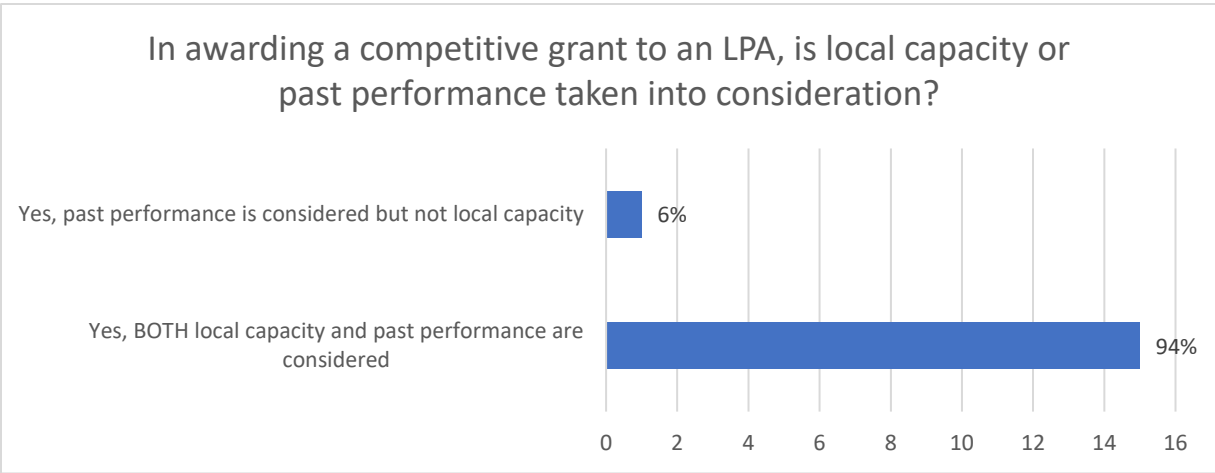
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In awarding a competitive grant to an LPA, is local capacity or past performance taken into consideration?

Yes, past performance is considered but not local capacity — 6%

Yes, BOTH local capacity and past performance are considered — 94%

Figure 1: Responses to the poll question, "In awarding a competitive grant to an LPA, is local capacity or past performance taken into consideration?"

An additional polling question asked participants where they believed the MPOs "got stuck" in the grants administration process (Figure 2). The answers shown in Figure 3 illustrate the diversity of the participants' grant administration experiences, which would provide informed feedback in the session discussions. Those that selected "other" in response to this poll clarified their answers with examples of MPOs unable to meet deadlines causing withheld payments as well as the turnaround time for municipal approval creating delays. This is often further complicated by turnover at the local level, especially among project managers.

Where do MPOs get stuck in the grant administration process?

Within the project itself — 15%
RFPs — 36%
Other — 9%
Getting invoices — 36%
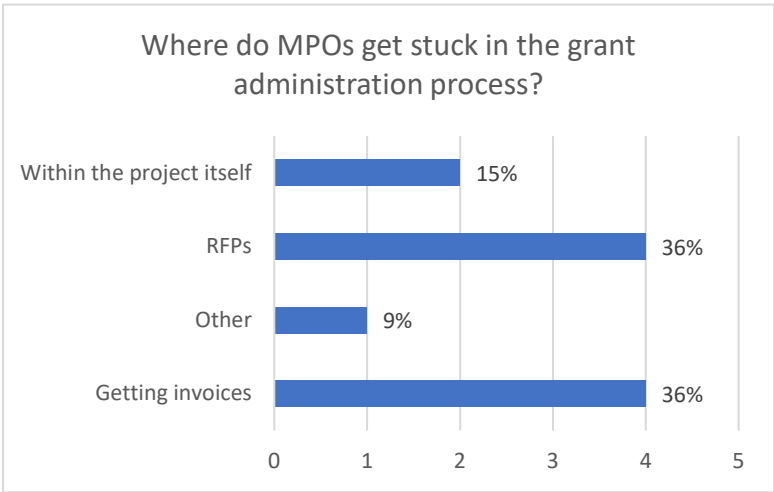
Figure 2: Responses to the poll question, "Where do MPOs get stuck in the grant administration process?"

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Key takeaways from the facilitated discussion were as follows:

- Capacity of the sub-recipients is difficult to measure; criteria for measuring capacity could include factors such as staffing, number of commitments, and local match.
  - Reaching disadvantaged communities can be a challenge, and technical assistance in this area is desired.
  - New discretionary grant programs authorized under the Bipartisan Infrastructure Law (BIL/IIJA) provide additional opportunities for awarding funds but will require additional support and technical assistance.
- Frequent staff turnover among sub-recipient organizations can significantly hinder their capacity through knowledge loss.
  - Maintaining lines of vertical in-person or virtual communication among sub-recipients, recipients, and awarding agencies provides a method for disseminating information on organizational changes (like the loss of a staff member) quickly.
- Hosting collaborative meetings and providing trainings improves sub-recipient knowledge, skills, and abilities for increased capacity, while relationship-building lowers risk by establishing rapport.
  - In some instances, municipalities may be required to attend half-day training sessions.
  - A two-hour National Highway Institute (NHI) hosted trainings, titled FHWA Planning and Research Grants: Program Administration (23 CFR Part 420), FHWA Planning and Research Grants: History, Sources, and Regulations, and FHWA Planning and Research Grants: The Uniform Guidance (2 CFR Part 200) Parts 1 and 2 are available for free online.
  - Courses, seminars, and workshops are offered by the FHWA Resource Center Finance Team.
- Awarding entities should keep in mind that sub-recipients with the least capacity may be the most in need of funding, and that some events leading to decreased capacity (e.g., disasters, the COVID-19 pandemic) or a "high risk" designation are beyond their control.
- Auditing performed by MPOs in tandem with State DOTs reiterates procedure and provides a direct route for corrective action, if necessary.
  - Creative solutions to mitigate risk include sub-recipient behavioral incentivization through a graduated system of prequalifications for additional or larger grants (like Vermont's Better Connections Program), reinforcing proper grant administration procedure while expanding and empowering the organizations.
  - Applicants may be required to meet awarding partners or counties virtually or in-person, both in the pre-award and post-award phases.
- The FHWA Resource Center, WisDOT, ARC, South Jersey Transportation Planning Organization (SJTPO), and VTrans all had some form of a pre-award risk assessment checklist, including Vermont's Grantee Risk-Based Assessment Form, SJTPO's Pre-Award Risk Assessment Form (pg. 29) that has be completed for every grant application.
  - Federal awarding agencies cannot prescribe a specific risk-assessment method, but the partners are free to craft tools for their own programmatic assessment.

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- Many of these checklists contain common requirements for applicants to share their most recent audit and history of corrective action but can be tailored to best meet the awarding entities' and sub-recipients' needs and characteristics.

Subaward Agreements

Peers from the FHWA Vermont Division and VTrans opened the session, sharing presentations about their State's development and execution of grants, as well as the processes and procedures between vertical partners in the administration of those grants with the State's sole MPO.

Notable Takeaways

- **Christopher Jolly, Planning and Programming Engineer, FHWA Vermont Division**
  - Federal agreements with the MPO (CCRPC) include a detailed scope of work, payment provisions, cost proposals, State standards, and all required provisions within State contracts and grants. The agreement features typical payment provisions, including the requirements of monthly invoicing and progress reporting, which the MPO assigns to a project manager for each task on each contract. The agreement has clauses for indirect cost rates requiring additional review, as well as non-performance and termination.
  - For the 10 Regional Planning Commissions (RPCs) in Vermont, a typical grant agreement (e.g., the TPI program) is entered into for the State Fiscal Year (SFY) where, upon approval, each of the RPC's programs becomes a specific task. The RPCs develop their indirect cost rate and self-certify their adherence to State purchasing laws. Atypical agreements (e.g., over a financial threshold) must receive additional hierarchical approval.
  - The VTrans Planning Department is responsible for executing agreements as well as developing the scope of work and budget, but all agreements, regardless of recipient type, must be approved (and subsequently audited) by the VTrans Contract Administration Audit Section, which performs compliance checks with all Federal-aid regulations and the bulletins issued by the Vermont Department of Financial Regulation.
- **Matthew Arancio, Planning Coordinator, VTrans**
  - Vermont's size provides opportunities for intimate regulatory connections between the State and its MPO and RPCs, which have fostered a trusting relationship that offers the thoroughly vetted recipients freedom, within reason, to adapt the TPI program to accomplish their planning needs.
  - VTrans is one of several State agencies (e.g., Vermont Agency of Natural Resources, Vermont Agency of Commerce) funding grants available to the RPCs.
  - With limited vendor ability, the RPCs frequently contract with consultants; the responsibility to submit reports and attend meetings and reviews concentrates activity at the RPC level. The accountability falls to the RPC, replacing State oversight with touchpoints.
    - Presenters likened "corrective action" to preemptive action since guidance is provided through every step of the process and can usually be preventative.
  - VTrans Planning Coordinators take on the role of managing actor within the context of grant agreements, providing aid through the preliminary review of workplans, and assessing the suitability of workplans or activities.

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o VTrans is currently seeking means to provide technical assistance to communities eligible for direct grants offered under the Bipartisan Infrastructure Law.
o The typical timeframe from RFP to contract execution in Vermont is five months or less.

Post-Presentation Discussion

This session was followed by a polling question (Figure 3) asking participants if they had ever experienced issues with a sub-recipient that required corrective action, to which 57% answered affirmatively. While 28% said no, 14% answered "almost," leading to a conversation among meeting participants about regulatory compliance.
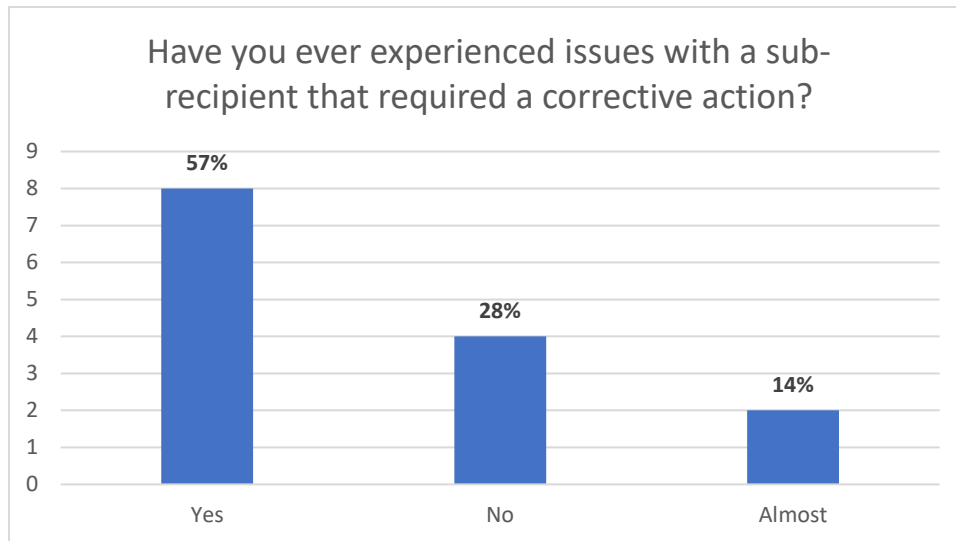
Have you ever experienced issues with a sub-recipient that required a corrective action?

	Yes	No	Almost
	57% (8)	28% (4)	14% (2)

Figure 3: Responses to the poll question, "Have you ever experienced issues with a sub-recipient that required a corrective action?"

Key Takeaways

Key takeaways from the facilitated discussion were as follows:

- Terminating a planning sub-recipient contract is infrequent and considered a worst-case scenario. These instances tend to diminish staff capacity to coach noncompliant sub-recipients through corrective action. Resolution with sub-recipients may require long-term mediation, either by regulators or a hired third-party advisor.
  o An example of a sub-recipient repeatedly submitting the same audit for consecutive fiscal years was shared. The FHWA Resource Center stated that they see this issue frequently. Sub-recipients must complete an audit requirement every year if they expend more than $750k in Federal funds. Otherwise, this organization was flagged for a risk assessment.
  o The FHWA Resource Center reviewed the basics of 2 CFR 200, 23 CFR 630 covering preconstruction procedures, 2 CFR 200.340 covering termination, and 2 CFR 200.341 Notification of Termination Requirement.

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- In April 2022, the unique entity ID (UEI) number replaced the Data Universal Numbering System (DUNS) number for use on SAM.gov and other Federal award systems. The group reviewed this change, and it was recommended that each organization appoint a SAM.gov point of contact, if they have not already done so.
- In addition to providing cost estimates and projections, the presenters identified their own accounting deficiencies, and the meeting participants agreed to route concerns about sub-recipient accounting to their finance points of contact. However, due to regulatory stipulations for submission and review periods, FHWA requested that all sub-recipient indirect cost inquiries come to them.
- FHWA reminded participants that projects require a deliverable or another tangible product at the time of close-out, whether that be meeting minutes, software invoices, or other proof of activity.
  - To ensure all proper elements are included in the subaward agreements, States often model their program forms on the FHWA Example Subaward Agreement Structure document (see Appendix B), which includes the nine requirements listed on a form shared by FHWA. Compliance procedures may be included as well.
  - Some MPOs perform risk assessments on an entity-level, resulting in a sub-recipient with one risk assessment for several agreements. Depending on the sub-recipient's responsiveness, it can take from 1-3 months to get an agreement signed.

Sub-recipient Monitoring

Peers from WisDOT and SEWRPC opened this session, sharing presentations about how their agencies are monitoring sub-recipient activities through communication, shared expectations, and managerial tools.

Notable Takeaways
- **James ("Jim") Kuehn, Statewide MPO-RPC Coordinator, WisDOT**
  - Sub-recipient monitoring requires consistent relationships based on shared expectations. Because unusually high turnover due to COVID-19 and retirements is causing both capacity and continuity issues, additional monitoring may be required.
  - Providing State-crafted resources such as the Unified Planning Work Program Handbook and the FTA Grant Program Transit Procurement and Contract Administration Manual to the sub-recipients makes setting mutual expectations easier and more transparent.
    - WisDOT produced its Vendor Procurement Guide for MPOs & RPCs after an FHWA Resource Center Grant Administration Management training in 2019. These resources emphasize cross-applicability, information symmetry and accessibility with the intent to standardize State and Federal language across platforms and documents.
  - While the State has the power to withdraw funding, internal de-escalation techniques and formal compliance procedures like corrective action plans are always preferred.
  - Work activities must be listed in the UPWP for reimbursement eligible. If the MPO cannot expend its funds by the end of the year, the funds are relinquished back to the State.

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- Funding allocations are based on population; Wisconsin's four TMAs (Appleton, Madison, Milwaukee, Green Bay) pool some of this funding to share with the smaller MPOs in the State to make sure these MPOs have at least two staffers.
- **Steve Hirschfield, Transit Programs Lead, WisDOT, and Alexander Gramovot, Planning Section Chief, WisDOT**
  - The WisDOT Transit group is small and relies on tools, both technological and low-tech, such as stated procedures, forms, and guidance that lay out the requirements for sub-recipients.
  - Grants management technology (e.g., BlackCat by Panther International, B2GNow) is available for monitoring purposes, such as ensuring FTA transit grant compliance. Software can be effective to both provide storage and access to stakeholders as well as monitor sub-recipients through desk audits.[2]
  - In-person monitoring tools include mid-year meetings with liaisons, compliance site reviews, and convening technical advisory committees (TACs).
  - WisDOT retains a contractor on a permanent basis to perform "management performance reviews", required by statute of the State of Wisconsin. Using a template, the contractor evaluates management performance for each agency against statutory requirements with particular attention to those agencies deemed high-risk. These reviews are meant to be collaborative, not punitive, exercises culminating in a peer analysis and recommendations for improvements in the functional areas.
  - Compliance Site Reviews specifically focus on FTA compliance areas. Contractors collect data from the field prior to a site review from sub-recipients. The Public Transit Grantee Guide lays out the requirements of public transit grantees.
- **Travis Houle, TAP, and CMAQ, WisDOT**
  - Wisconsin State legislature section 85.021 defines Commencement. With the Transportation Alternatives Program (TAP) set-aside, funds are suballocated to Transportation Management Areas. Project sponsors have up to six years to spend their funding. To determine recipient risk, a pre-award risk assessment is conducted to understand the history of the agency. The Sponsors Guide to Non-Traditional Project Implementation is a resource to support the management of TAP and CMAQ related funding. Sponsors are responsible for local letting procedures, schedule monitoring (in coordination with WisDOT), and contractor monitoring, record keeping, and reporting. WisDOT responsibilities include project tracking using integrated project scheduling and financial tracking tools, change management (schedule changes, scope changes), process monitoring (construction oversight, consultant selection, etc.), and annual encumbrance tracking, Federal reporting, and schedule oversight.
- **Elizabeth ("Libby") Larsen, Director of Administration, SEWRPC**
  - SEWRPC reviews all projects with Federal, State, or local funds. This includes the Environmental Protection Agency (EPA) and Department of Natural Resources (DNR) funding, which is beyond the purview of WisDOT's tracking.

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[2] References to various tools in this report do not represent an endorsement. FHWA recognizes that many tools are available and encourages agencies to use the tools that work best for them.

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- Each stakeholder in the Federal grant management process has a preferred method of tracking sub-recipients, their activities, and their expenses.
  - Information management that streamlines and reduces redundancy in data, such as a strict project identification system, helps to reduce confusion when monitoring many sub-recipients at once.
- Attentiveness to internal staff is as important as the attention paid to external partners; efforts to retain trustworthy, knowledgeable, and experienced staff can help prevent lapses in monitoring.
  - Long-term intergovernmental relationships between key personnel, TACs, and communities aid in developing a holistic project management approach that others depend on in an environment subject to constant priority shifts.
- SEWRPC works with the WisDOT staff in two primary ways with regard to grants administration: a mid-year review meeting with WisDOT, FHWA, and FTA staff, and an in-depth progress report submitted with its quarterly invoice.

Bringing it all Together and Looking Ahead

This session opened with a final poll question[3] (Figure 4) concerning the quality and timeliness of sub-recipients' progress reports. The majority (64%) said the reports met these expectations "very often," and 14% said "always." While no one answered "never," 7% responded with "rarely," and 14% with "sometimes." A short conversation about the poll results occurred first, followed by a facilitated discussion and peer participation session led by the FTA Office of Planning. The peer interaction was captured for participants to record their thoughts about challenges, opportunities, and takeaways using a virtual "whiteboard."
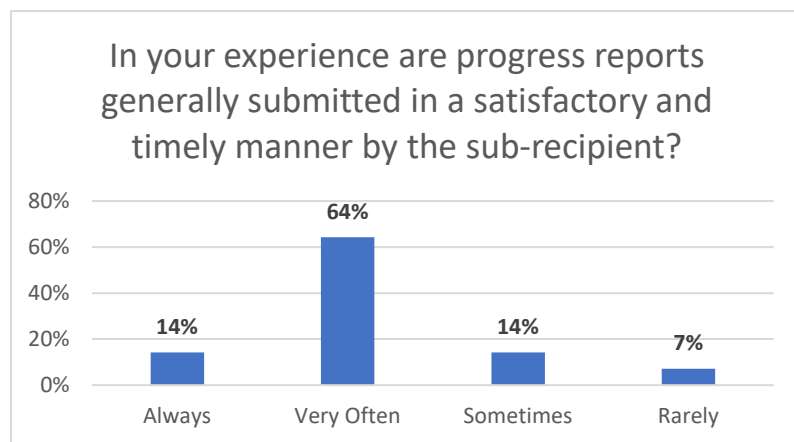
In your experience are progress reports generally submitted in a satisfactory and timely manner by the sub-recipient?

Figure 4: Poll question asking participants for their feedback on progress reports submitted

Notable Takeaways

- Participants had a mutual interest in each other's technology, including methods of tracking both vertically and horizontally. Tools ranged from shared spreadsheets, to Oracle PeopleSoft products, to Microsoft 365's SharePoint, Project, and Box.
  - Participants shared ideas for possible technologies for working with planning grants including interconnected systems that could request authorizations; measure and manage

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[3] The exact question asked of the participants was: "In your experience, are progress reports generally submitted in a satisfactory and timely manner by the sub-recipient?"

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performance; notify stakeholders internally or externally; manage, share, and edit records collaboratively; and maintain records securely.

- The pandemic-era virtual meeting platforms had some positive effects on granting organizations and their sub-recipients such as improved operational efficiency and significant time and money saved from forgoing travel.
- Granting organizations are seeking opportunities to bring disadvantaged communities into the planning process as a means of achieving the U.S. Department of Transportation's Justice40 Initiative. To better provide for underserved and over-burdened communities, planning partners can encourage these groups to apply for grants and provide technical assistance in the application process.
    - o Stakeholders can actively break down silos to address equity more successfully as a joint resource.
    - o The peers wanted further guidance on sub-recipient monitoring for Title VI.

Conclusion and Key Takeaways

This peer exchange, led by FHWA and NJDOT, convened representatives from Federal, State, and regional planning stakeholders across the U.S. to discuss their experiences, roles, and responsibilities in the administration of Federal planning grants. State DOTs and MPOs presented their processes, procedures, and perspectives as pass-through entities, discussing at length the roles and responsibilities of recipients and sub-recipients. Participants shared their experiences, lessons learned, and key challenges during facilitated discussions and identified opportunities for present and future engagement. Peers shared resources with notable practices and tools both in use and in development to aid defining, designing, and executing Federal planning grants. Participants found value in participating and connecting with their partners as part of the peer exchange, which created a collaborative environment allowing for information-sharing from multiple intergovernmental levels. In closing, participants summarized key takeaways from discussions, including:

- Contextual learning through dialogue
    - o The peers appreciated a platform to share their experiences and practices and highlight the social, political, and economic context of their specific jurisdictions.
    - o Compared to other cooperative environments such as a conference, the peer exchange's intimate setting with dialogue about a targeted, mutual process allowed for the free flow of ideas and perspectives.
    - o The pass-through entities' programmatic adaptability demonstrated possibilities to the peers for changing implementation, where possible, and offered ways to adapt to challenges in less flexible areas of the work.
- Understanding regulations to receive and provide technical assistance
    - o Peers discussed processes to meet Federal grant administration requirements. Clarity on the regulatory requirements can support effective technical assistance, timely delivery of projects, and report delivery. This peer exchange provided a forum for addressing challenges and identifying best practices for successful grant management.

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- Relational approaches to compliance
    - Peers discussed that agreements made with sub-recipients constitute a legal commitment to perform the work but also represent a kind of social contract premised on relational procurement principles like stewardship. Peers shared that enforcing desired behaviors among sub-recipients can oftentimes be more successfully accomplished through communication of shared expectations and roles and trust among participants in the grant process.
- Multifaceted and unexpected considerations in determining sub-recipient capacity
    - Peers shared various approaches to measure a sub-recipient's capacity, such as letters of commitment (verbal support) from partners; matching from partners (financial support); resources available, including project staffing; the division of work; performance management; participation and communication with granting organizations; and the timeliness and satisfaction of work completed. The peers agreed that capacity building, in preparation for the required effort to execute the BIL programs, would be wise. Capacity building should also be extended to disadvantaged sub-recipients to ensure they are empowered and supported in their efforts to make infrastructure improvements.
- Feedback loops for determining sub-recipient risk
    - Peers connected over the similarities between their risk assessment methodologies and discussed their differences. Examples shared by FHWA Resource Center during the peer exchange provided the peers with templates to compare against their own processes.
- Unique but clarified roles
    - High rates of turnover left many of the peers at all levels of the grant administration process taking on roles within their organizations—or "wearing many hats"—to stand in for unfilled positions and to prevent "knowledge gap risks." Among very small and resource-deficient sub-recipient entities, this could cause delays in required tasks and project delivery, affecting all others along the chain. The peers respected the unique challenges presented by taking on additional duties or roles, and the dedication this extra-role work required, but felt that role clarity should be a part of shared expectations and cooperative and collaborative intergovernmental and interorganizational culture.

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Appendix A: Key Contacts

Peer Exchange Planning Team

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Peers

Matthew Arancio, Planning Coordinator
Vermont Agency of Transportation (VTrans)

Thomas Caiafa, Metro Planning Branch Chief
Georgia Department of Transportation (GDOT)

John Orr, Manager, Transportation, Access, and Mobility Group
Atlanta Regional Commission (ARC)

Christopher Jolly, Planning and Programming Engineer
FHWA Vermont Division, Montpelier, VT

James Kuehn, Statewide MPO-RPC Coordinator
Wisconsin Department of Transportation (WisDOT)

Libby Larsen, Director of Administration
Southeastern Wisconsin Regional Planning Commission (SEWRPC)

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Appendix B: Example Documents (Subaward Agreement Structure and Subrecipient Risk Assessment Tool)

Example Subaward Agreement Structure

DISCLAIMER: This is not an official tool and is provided as an example of a subaward agreement and the various requirements that may be applicable to the subaward. 2 CFR 200 provides the administrative requirements necessary for delivering a Federal award/subaward and 23 CFR and 49 CFR provide the programmatic requirements necessary to deliver FHWA projects. Recipients and subrecipients may use whatever format they choose, and this example provides references to requirements, but is not an all-inclusive list and not all requirements are applicable to all subawards. Contact the FHWA Division Office to ensure all appropriate requirements are addressed.

1. **State the Intent**
   - ♦ e.g. "This is a subaward of federal financial assistance from *Organization A* (hereinafter referred to as "recipient/pass-through entity") to *Organization B* (hereinafter referred to as "subrecipient"). Reference 2 CFR 200.1 (ex. Federal Awarding Agency (FHWA), Recipient/Pass-through (Your State DOT), Subrecipient (City/LPA in your State)

2. **Provide the following general information as part of a federal award (14 required data elements) (2 CFR 200.332):**
   a) Subrecipient Name (must match DUNS registered name)
   b) Subrecipient DUNS Number
   c) Federal Award Identification Number (FAIN)
   d) Federal Award Date
   e) Period of Performance Start and End Date
   f) Amount of Federal Funds Obligated by this action
   g) Amount of Federal funds obligated to subrecipient
   h) Total of Federal Award (Total Cost)
   i) Total Approved Cost Sharing/Matching
   j) Project Description (statutory requirement of FFATA)
   k) Name of Contacts to include Federal agency and pass-through entity contact information
   l) CFDA Number and Name
   m) Is the Award for Research and Development?
   n) Indirect Cost Rate (ICAP or de minimis rate)

3. **General Terms and Conditions**
   a) Cost sharing or matching requirements for the award (23 USC 120, 2 CFR 200.306)- (describe the types of match authorized, including tapered match, third party donations, etc.)
   b) Authorization to proceed (23 CFR 630.106)
   c) Provisions for modification of the original agreement (2 CFR 200.308 and 23 CFR 630.110)
   d) Required financial and performance reports as required by the pass-through to meet federal requirements.
   e) Approved indirect cost rate between subrecipient and pass-through or pass-through and a federal entity.
   f) Language on access to records for an audit to include subrecipient records, financial statements to support regulation and policy (2 CFR 200.300) and Period of Performance (2 CFR 200.309)
   g) Performance Goals (2 CFR 200.301)- (indicators used, milestones, and/or expected outcomes to include timelines and impacts)
   h) Single Audit Requirements if Federal expenditures exceed $750,000 in non-Federal entity's fiscal year (2 CFR 200 Subpart F)

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i) Responsible Legal Parties – for pass-through entity and subrecipient
j) Venue/Policy – what law will govern if a dispute arises
k) Severability – if a provision is declared void, doesn't preclude the rest of agreement

4. **Scope of Work**
   ♦ This should include a very detailed description of the project and should articulate the project location and character of work. The scope of work should be detailed enough to determine eligibility, as well as identify the different phases and timelines for the project. These timelines would relate back to the period of performance dates required in 2 CFR 200.332. This scope of work could also be by reference to the grant application. Any changes in dates or amounts should be included in the subaward agreement.

5. **Programmatic Requirements**
   a) Planning requirements (23 CFR 420 & 450)
   b) Agreement provisions (23 CFR 630.112)
   c) Uniform Act (49 CFR 24)
   d) Environmental Impact (NEPA) and related procedures (23 CFR 771)
   e) Buy America (23 CFR 635.410)
   f) FHWA Contract Procedures (23 CFR 635 Subpart A)
   g) Required contract provisions (23 CFR 633 and Form FHWA-1273)
      i) Physical incorporation or FHWA-1273 into construction contract
      ii) Nondiscrimination (23 CFR 230)
      iii) DBE Assurance (49 CFR 26.13(b)
      iv) Davis-Bacon and Department of Labor requirements
      v) Contractor certification regarding suspension and debarment
   h) Force Account (23 CFR 635 Subpart B)
   i) Physical Construction Authorization (23 CFR 635 Subpart C)
   j) Construction Changes and Extra Work (23 CFR 635.120)
   k) Other FHWA programmatic requirements applicable to the award (e.g., QA, Design-build, utilities, railroad, etc.)
   l) Identify any State or Local programmatic requirements that may be applicable

6. **Documentation of Pre-Award Understandings**
   a) Inclusion of grant application by reference
   b) Certifications and Representations (2 CFR 200.208) –
      i) Civil Rights-Title VI / DBE (49 CFR 21 & 26, 23 CFR 200 & 230)
      ii) Environmental Approvals (23 USC 326 and 327, 23 CFR 771)
      iii) Right-of-Way-ROW (23 CFR 710, 49 CFR 24)
   c) Incorporate newly imposed requirements due to the risk assessment of the subrecipient
   d) Include information regarding reviewing risks based on (2 CFR 200.205)
   e) Review and include conflict of interest (2 CFR 200.112) statement and required disclosures (2 CFR 200.113) (including safeguarding PII 2 CFR 200.82)
   f) Review of Period of Performance 2 CFR 200.309 and allowability of costs
      i) Include review of Single Audit if applicable (>$750K in Federal expenditures)

7. **Post-Award Actions**
   a) Financial Management Standards (2 CFR 200.302)
   b) Procurement standards and competition (2 CFR 200.318-327, 23 CFR 172, 23 CFR 635.104)
   c) Payment (2 CFR 200.305) (Follow CMIA and payments must be made within 30 days of receipt of invoice unless improper)
   d) Cost Principles (2 CFR 200.4XX Subpart E) (allowable, allocable, and reasonable)

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    e) Documentation and Record Retention Expectations (2 CFR 200.302), (2 CFR 200.333)
    f) Reporting and Internal Controls (2 CFR 200.303), (2 CFR 200.328)
    g) Non-Compliance (2 CFR 200.339)
    h) Termination and Notice to Terminate (2 CFR 200.340) (2 CFR 200.341)
    i) Other Admin Requirements (e.g. real property (2 CFR 200.311), equipment (2 CFR 200.313), monitoring (2 CFR 200.329), etc.)

8. End of the Award Activities
    a) Closeout (2 CFR 200.344)
    b) Post Closeout and continuing responsibilities (2 CFR 200.345)
    c) Audit Requirements (2 CFR 200.501)

9. Attachments – Include Samples of Performance Reports, Risk Assessment Report, Letter on Indirect Costs Requests, 2CFR200 Compliance Supplement, and any required financial reports.

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Subrecipient Risk Assessment

INTRODUCTION

This Risk Assessment tool is based upon the [Risk Assessment Monitoring Tool](#) developed by the Association of Government Accountants (AGA) in cooperation with the U.S. Office of Management and Budget (OMB).

Assessment questions were developed and a score was established for each question. The assessment questions are categorized into separate sections and each section will have a weighted score. A section is also provided to provide an example of assessing specific programmatic Federal-aid compliance requirements but may not be all inclusive of all requirements.

DISCLAIMER: This is not an official tool and is provided as an example of a subrecipient risk assessment. Pass-through entities are required to perform risk assessments in accordance with 2 CFR 200, but FHWA cannot dictate how the State DOT will perform these assessments. This document may be used/modified/changed to assist in developing assessments specific to the State DOT.

RISK ASSESSMENT PROCESS

2 CFR 200.332(b) requires that pass-through entities evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward.

Risk management is a tool for focusing limited resources to efficiently manage programs and provide reasonable assurance that the risks are understood and are responded to appropriately. The goal of risk management should be to determine and prioritize monitoring strategies to respond to the risks identified.

The following questionnaire can be utilized in performing the initial risk assessment of the subrecipient. These questions could be asked directly to the subrecipient by the pass-through entity or could be provided to the subrecipient to answer and perform a self-assessment. The self-assessment would then be provided to the pass-through entity when completed.

Each question should be scored and the total score will be divided by the number of questions to come up with the Risk Score for each section. An Overall Risk Score is determined by averaging the score of each section. The risk assessment is completed by assessing risk by categories. This will assist in identifying specific areas of risk to focus monitoring efforts. When the risk assessment process is completed, the intent is to compare and prioritize all subrecipient assessments to determine and focus monitoring resources to those that are rated as the highest risk.

MONITORING

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The results of the risk assessment process will determine the level of monitoring required and the monitoring tools to be used to ensure proper accountability and compliance with Federal requirements.

2 CFR 200.332(d) requires that pass-through entities monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that the subaward performance goals are achieved. The required monitoring activities that a pass-through entity must perform for all subrecipients are:

- Reviewing financial and performance reports
- Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award
- Issue a management decision for audit findings pertaining to the Federal award (in accordance with 2 CFR 200.521)

Depending on the results of the risk assessment, a pass-through entity may utilize other monitoring tools to mitigate or remedy risks identified. The following monitoring activities may be useful:

- Providing subrecipients with training and technical assistance on program-related matters
- Performing on-site reviews of the subrecipient's program operations
- Arranging for agreed upon procedures engagements (in accordance with 2 CFR 200.425). In general these engagements must be conducted in accordance with GAGAS attestation standards and are limited in scope to one or more of the following types of compliance requirements: activities allowed or unallowed; allowable costs/cost principles; eligibility; and reporting.

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GENERAL ASSESSMENT

How many years of experience does the entity have in operating or managing Federal funds?

5+ years	4 years	3 years	2 years	=< 1 year
1	2	3	4	5

Score:_____

Has there been high staff turnover or agency reorganization that affects this program?

No	Yes (greater than one year ago)	Yes (less than one year ago)
0	4	5

Score:_____

How many years of experience does the staff assigned to the program have working with the program *(answer is number of funding cycles)*?

5+ years	4 years	3 years	2 years	=< 1 year
1	2	3	4	5

Score:_____

Has the entity been untimely in the submission of:

Applications

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)
0	2	3	4	5

Score:_____

Amendments

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)
0	2	3	4	5

Score:_____

Fiscal Reporting

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)
0	2	3	4	5

Score:_____

Billings

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)

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0	2	3	4	5

Score:_____

Budgets/Revisions

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)
0	2	3	4	5

Score:_____

Responding to Program/Fiscal Questions

No	Yes (once)	Yes (twice)	Yes (three times)	Yes (> three times)
0	2	3	4	5

Score:_____

5. Is the program unusually complex. *(select all that apply and total score)*?

None Apply/ Standard Project	Multiple Fund Types	Use of Tapered Match	3rd Party Donation	Innovative Finance (e.g., Garvee, PPP)	Innovative Contracting (e.g., Design Build)
0	1	1	1	2	2

Score: _____

6. Have any other entities (program offices, auditors, staff employed by the entity, etc.) alerted the pass-through entity of potential risk areas?

No	Yes (greater than one year ago)	Yes (less than one year ago)
0	4	5

Score:_____

7. Have any other entities (auditors, cognizant agency, pass-through entities, etc.) performed a review of the entities procedures and internal controls?

No	Yes (greater than one year ago)	Yes (less than one year ago)
0	4	5

Score:_____

General Assessment Risk Score: _____ *(total all scores and divide by 12)*

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LEGAL ASSESSMENT

1. Does the entity have or previously had a lawsuit(s) filed against them that is related to Federal-aid funding? *If yes, provide a list of all pending and/or previous lawsuits with detailed information regarding who filed the lawsuit, the reason and the final judgment rendered.*

No	Yes (greater than one year ago)	Yes (less than one year ago)
0	4	5

Score:_____

2. Is entity currently or previously been suspended or debarred?

No	Yes (previously, but not now)	Yes (currently)
0	4	5

Score:_____

3. Have any organization staff been jailed, convicted of a felony or are currently under criminal investigation?

No	Yes (greater than one year ago)	Yes (less than one year ago)
0	4	5

Score:_____

Legal Assessment Risk Score: _____ *(total all scores and divide by 3)*

Page Break

MONITORING/AUDIT ASSESSMENT

1. When was the last time the entity had an on-site monitoring visit?

< 1 year	1 year	2 years	3 years	> 4 years
0	1	3	4	5

Score:_____

2. When was the last time the recipient received a single audit?

1 year	2 year	3 years	4 years	> 4 years or never
0	1	3	4	5

Score:_____

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3a. Were there findings/violations identified in prior monitoring visits or Single Audit? *Provide a list of the findings/violations identified.*

No	Yes (greater than two years ago)	Yes (less than two years ago)
0	2	3

3b. Have the findings/violations been resolved and/or closed?

Yes	No
0	3

Score: _____ (*add 3a. and 3b. together*)

Monitoring/Audit Assessment Risk Score: _____ (*total all scores and divide by 3*)

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ACCOUNTING SYSTEM/INTERNAL CONTROL (IC) ASSESSMENT

23 USC 106 – Project Approval and Oversight paragraph (g)(4) requires that States determine that subrecipients of Federal-aid funds have adequate project delivery systems for projects and sufficient accounting controls to properly manage such Federal-aid funds.

2 CFR 200.302 – Financial Management outlines the financial management system requirements for non-Federal entities awarded Federal funds.

In order to meet the requirements of 23 USC 106, States should ensure that a LPA Financial System Assessment is performed for each subrecipient. This could be an assessment performed by the State or the subrecipient could perform a self-assessment and provide it to the State for review.

The following questions should be answered based upon the results of the LPA Financial System Assessment.

1. Does the entity have a financial management system in place to track and record the program expenditures? *(Example: QuickBooks, Visual Bookkeeper, Socrates Media, Peachtree or a Custom Proprietary System)*

Yes	No
0	5

Score:_____

2. Has a LPA Financial System Assessment been completed for the subrecipient? *If yes, provide assessment to pass-through entity.*

Yes	No
0	5

Score:_____

3a. Do the accounting systems identify the receipts and expenditures of program funds separately for each award?

Yes	No
0	2

3b. Will the accounting system provide for the recording of expenditures for each award by the budget cost categories (program codes) shown in the approved budget?

Yes	No
0	2

3c. Does the entity have a time and accounting system to track effort by cost objective?

Yes	No
0	2

Score: _____ (*add 3a, 3b and 3c together*)

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4. Does the entity have proper internal controls in place to ensure compliance with Federal statutes, regulations, and the terms and conditions of the Federal award? *Entities should utilize the Standards for Internal Control in the Federal Government (the"Green Book") issued by the Comptroller General of the United States or the "Internal Control Integrated Framework", issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).*

Is there a separation of duties (SOD) and responsibilities, including written delegations of authority (DOA)?

Yes-SOD and DOA	Only SOD or DOA	No SOD or DOA
0	3	5

Score:_____

Written policy or procedures for determining allowability of costs

Yes	No
0	2

Written policy or procedures for processing payments in accordance with 2 CFR §200.305 Payment

Yes	No
0	2

Written policy or procedures for entity procurement standards

Yes		No
0		2

Score: _____ *(add 4b, 4c and 4d together)*

Accounting/IC Assessment Risk Score: _____ *(total all scores and divide by 5)*

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OVERALL FISCAL ASSESSMENT

1. What is the size of the award in terms of percentage of overall funding for the entity?

< 10%	10%-25%	26%-50%	51%-75%	> 75%
1	2	3	4	5

Score:_____

2a. Are there variations between expenditures and the budget?

No	Yes
0	2

2b. Has the entity returned (lapsed) significant unspent funds?

No	Yes
0	2

2c. Does the entity have a large amount of budget carryover (greater than 50%)?

No	Yes
0	2

Score: _____ (*add 2a, 2b and 2c together*)

3. Does the entity have any inactive projects/awards? *An inactive project is an individual award that has had no expenditures for greater than 12 months.*

No	Yes
0	5

Score:_____

4. Does the entity provide adequate supporting documentation for billing reimbursements?

No	Yes
0	5

Score:_____

Fiscal Assessment Risk Score: _____ *(total all scores and divide by 4)*

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FINANCIAL STABILITY ASSESSMENT

1. Has the State or other authority placed the entity in a special financial status (e.g., financial watch, fiscal emergency, high risk, etc.)?

No	Yes
0	5

Score:_____

2. Do the financial reports show an insufficient fund balance after meeting its obligations?

No	Yes
0	5

Score:_____

3. Has the entity had difficulty meeting matching/maintenance of effort requirements?

No	Yes
0	5

Score:_____

4. Do the entities financial reports indicate cash flow problems?

No	Yes
0	5

Score:_____

5. Do the financial reports indicate possible supplanting issues?

No	Yes
0	5

Score:_____

6. Do the entity's financial reports indicate a large number of corrections or journals?

No	Yes
0	5

Score:_____

Financial Stability Assessment Risk Score: _____ *(total all scores and divide by 6)*
GENERAL PROGRAMMATIC ASSESSMENT

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DISCLAIMER: The following programmatic assessment questions are provided as an example and are not all inclusive of the questions that should be asked. Please coordinate with the FHWA Division Office on specific programmatic questions.

How many years of experience does the entity have in administering FHWA Federal-aid funds?

5+ years	4 years	3 years	2 years	=< 1 year
1	2	3	4	5

Score:_____

Are the Federal-aid requirements and responsibilities to be assumed by the subrecipient identified in a stewardship and oversight agreement between the State and subrecipient and/or outlined in each individual subaward agreement?

Yes-Both	Yes-S&O	Yes-Subaward	No
0	1	2	5

Score:_____

Does the entity have a full-time employee designated as being in "responsible charge". *This employee is familiar with day to day operations of the entity, Federal-aid requirements, and directs staff or consultants to carry out award/project administration.*

Yes	No
0	5

Score:_____

General Programmatic Assessment Risk Score: _____ *(total all scores and divide by 3)*

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CONTRACT/CONSTRUCTION PROGRAMMATIC ASSESSMENT *(This section would only be completed if subrecipients utilize Federal-aid funds for Highway Construction.)*
How much experience does the entity have in administering Federal-aid construction projects?

5+ years	4 years	3 years	2 years	=< 1 year
1	2	3	4	5

Score:_____

Has on-site monitoring or FHWA's Compliance Assessment Program (CAP) identified issues with any of the following:

Environmental Impact (NEPA) and related procedures (23 USC 326 and 327, 23 CFR 771)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Uniform Act and Right-of-way (49 CFR 24 and 23 CFR 710)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Buy America (23 CFR 635.410)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

FHWA Contract Procedures (23 CFR 635 Subpart A)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Physical incorporation or FHWA-1273 into construction contract

No	Yes- issue has been resolved	Yes-issue has not been resolved

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0	3	5

Score:_____

Nondiscrimination (23 CFR 230)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

DBE Assurance (49 CFR 26.13(b))

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Davis-Bacon and Department of Labor requirements

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Contractor certification regarding suspension and debarment

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Force Account (23 CFR 635 Subpart B)

No	Yes- issue has been resolved	Yes-issue has not been resolved
0	3	5

Score:_____

Contract/Const. Programmatic Assessment Risk Score: ___ *(total all scores and divide by 11)*

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RISK ASSESSMENT CALCULATION

General Assessment Risk Score: _____

Legal Assessment Risk Score: _____

Monitoring/Audit Assessment Risk Score: _____

Accounting/IC Assessment Risk Score: _____

Fiscal Assessment Risk Score: _____

Financial Stability Assessment Risk Score: _____

General Programmatic Assessment Risk Score: _____

Contract/Const. Programmatic Assessment Risk Score: _____

Overall Risk Score (*Add all risk scores above and divide by 8*): _____

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