**PROGRAMMATIC RISK ASSESSMENT QUESTIONNAIRE (PRAQ)**

The purpose of this assessment is to evaluate the programmatic risk of the applicant. Limited program experience, protocols and internal control governing program delivery will increase an applicant’s degree of risk but will not prohibit the applicant from becoming a grantee.

The programmatic risk assessment questionnaire includes 5 risk categories. There is a computed risk rating for each category:

* 1. Quality of management systems
  2. History of performance
  3. Reports and findings from audits performed
  4. Applicant’s ability to effectively implement statutory, regulator or other requirements
  5. Agency and/or program-specific questions

Based on the applicant’s responses to the questionnaire, the risk rating is computed. Medium or high risk in any risk category will result in specific conditions in the NOSA and UGA pursuant to 2 CFR 200.207.

Patterns or trends in programmatic risk will influence GATA training as well as the agency’s monitoring plan. Appropriate support must be provided by GATU and the agency to build grantee capacity.

**Administering the Programmatic Risk Assessment**

1. The awarding agency adds program-specific references to questions in Sections 1-4, where applicable, and agency and / or grant-specific questions under section 5. *The awarding agency is responsible to ensure the applicant understands that their responses are to be specific to the associated program*.
2. The programmatic risk assessment questionnaire is distributed to the applicant by the agency prior to an awarding decision.
3. The applicant returns the completed questionnaire to the awarding agency following the agency’s protocol.
4. The awarding agency assigns a point value to the questionnaire responses: Low Risk = 1, Medium Risk = 2, High Risk = 3
   1. If the question has subparts, the average of the subparts equals the question’s risk rating.
   2. Based on the number of questions answered in the Section, the Section average is computed.
   3. The Section Average determines the applicant’s risk rating: 1-1.4 = Low Risk; 1.5–2.4 = Medium risk, 2.5 – 3 = High Risk
5. If the Section Average risk rating is Medium or High (as defined above), applicable specific condition(s) are assigned. Refer to the Programmatic Specific Conditions chart for general verbiage. Consider standard program requirements when setting specific conditions. For example, if standard reporting is quarterly more frequent reporting would be monthly.
6. The agency communicates the applicable specific condition(s) through the NOSA and UGA.

**A SEPARATE PROGRAMMATIC RISK ASSESSMENT IS REQUIRED FOR EACH**

**GRANT APPLICATION. RESPONSES MUST BE PROGRAM-SPECIFIC.**

|  |  |
| --- | --- |
| **Program Associated with this Programmatic Risk Assessment:** | **Unsewered Communities Construction Grant Program** |
| **Fiscal Year:** |  |
| **Applicable CFR or state citation:** |  |
| **Awarding State Agency:** | **Illinois Environmental Protection Agency** |
| **Entity Completing Programmatic Risk Assessment:** |  |
| **Individual Completing Programmatic Risk Assessment:** |  |
| **Contact Information for Completer (Phone and Email):** |  |

To comply with federal risk assessment requirements of 2 CFR 200.205, the state awarding agency must review the programmatic risk posed by applicants. Illinois utilizes this programmatic risk assessment questionnaire to comply with the federal requirement.

1. **Quality of management systems and ability to meet the management standards**
2. Do you have written policies and procedures that guide program delivery on the topics of:
3. Program outcome tracking and reporting mechanisms YES (1)/NO (3)
4. Relevant documentation of services/goods delivered YES (1)/NO (3)
5. Staff management policies and procedures YES (1)/NO (3)
6. Standards of conduct re: selection, award, or administration of grants YES (1)/NO (3)
7. Real or perceived conflict of interest re: selection, award, or administration

of grants YES (1)/NO (3)

1. Complaint/grievance resolution policies and procedures YES (1)/NO (3)
2. Safeguarding funds, property and other assets against loss from unauthorized

use of disposition YES (1)/NO (3)

1. Management of grant terms YES (1)/NO (3)
2. Written approval from funding agency when key personnel change YES (1)/NO (3)
3. Written approval from funding agency when program scope changes YES (1)/NO (3)
4. Participant eligibility, if applicable YES (1)/NO (3)/NOT APPLICABLE (2)
5. Do you have internal controls that govern program delivery on the topics of:
6. Quality assurance reporting YES (1)/NO (2)
7. Unit costs, expense analysis/management YES (1)/NO (2)
8. Accreditation/licensing compliance program YES (1)/NO (2)/NOT APPLICABLE (1)
9. How many years of experience does the project leader have managing the scope of services required under this program?

□ More than five years (1)

□ One to five years (2)

□ Less than one year (3)

1. Does the organization have a time and effort system to track program-specific work performed?

YES / NO Yes (see below)/ No (3)

If “YES”:

* 1. Does the system record all time worked, including time not charged to awards? YES (1)/ NO (3)
  2. Does the system include sign-off by the employee and supervisor. YES (1)/ NO (3)

If “NO”, go to question 1.5.

1. Are program payments based on a rate or unit of service?

If “YES”:

1. Does the organization have written procedures to ensure accurate invoicing? YES (1) /NO (3)
2. Does a second person sign-off on the invoice? YES (1) /NO (3)

If “NO”, go to question 1.6.

1. Does the program have match or related requirements?

If “YES”:

1. Does the organization have written procedures for match reporting? YES (1) /NO (3)
2. Does a second person sign-off on match reporting? YES (1) /NO (3)

If “NO”, go to question 1.7.

1. Is the organization prepared to utilize periodic performance reports to communicate program outcomes?

□ Performance reports are an established part of grant management procedures. (1)

□ Performance data reporting is being developed as part of grant management procedures. (2)

□ We do not currently report performance data within our grant management. (3)

1. **History of performance**
2. How many years of experience does your organization have with grants of comparable scope and/or capacity?

□ More than five years (1)

□ One to five years (2)

□ Less than one year (3)

□ No experience; go to question 3.3 (3)

1. If your organization has received grants of comparable scope and/or capacity, provide a brief description of similar project goals and outcomes; specify the applicable year: Text response
2. During your last two fiscal years, how frequently has the organization submitted project performance reports on time?

□ Always (1)

□ Reported late up to three times (2)

□ Reported late four or more times (3)

□ Not applicable – not a requirement of awards previously received (3)

1. Does your organization have performance measurements that tie to financial data? YES (1) /NO (2)
2. Have there been any significant changes in your organization in the last fiscal year related to program delivery:
   1. Management / leadership personnel YES (2) /NO (1)
   2. Reorganization or parent / subsidiary relationships YES (2) /NO (1)
   3. Significant changes in programs / grants funded YES (2) /NO (1)
   4. Statutory or regulatory requirements imposed on your organization type YES (2) /NO (1)
3. Provide a brief explanation for all “YES” responses to question 2.4. Text response
4. Will a sub-grantee/sub-recipient / sub-award be utilized to manage, administer or complete the project? YES (2) /NO (1)

If NO, go to question 3.1.

1. What responsibilities will the sub-grantee/sub-recipient/sub-award perform under this program?
   1. Participant eligibility determination YES (3) /NO (2)
   2. Case management YES (3) /NO (2)
   3. Performance reporting YES (3) /NO (2)
   4. Financial reporting YES (3) /NO (2)
   5. Invoicing YES (3) /NO (2)
   6. Other \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ YES (3) /NO (2)
2. What percentage of grant funds does the organization anticipate passing to sub-grantees/sub-recipients/sub-awards?

□ Less than 10% (1)

□ 10-20% (2)

□ More than 20% (3)

1. Does your organization have an implemented policy for sub-grantee / sub-recipient monitoring? YES (see below) /NO (3)

If YES, does it include:

□ on-site review (1)

□ review of prior monitoring and desk /quantitative review (1)

□ review of prior monitoring only (2)

□ desk / quantitative review only (2)

1. **Reports and findings from audits performed under Subpart F—Audit Requirements of this part or the reports and findings of any other available audit**
2. During the last two fiscal years, has your organization been out of compliance with *programmatic* terms and conditions of awards?

□ Organization has not been audited; Go to Question 3.6 (2)

□ No occurrences of non-compliance; Go to Question 3.6 (1)

□ One to three occurrences of non-compliance (2)

□ Four or more occurrences of non-compliance (3)

1. If your organization had at least one occurrence of non-compliance with programmatic terms and conditions, summarize each occurrence. Text response
2. Have corrective actions been implemented within the specified timeframe? YES (1) /NO (3)
3. Provide explanation for any corrective actions that were not implemented within the timeframe specified and for any corrective actions that remain open. Text response
4. Have there been findings regarding conflict of interest within the last two fiscal years? YES (2) /NO (1)
   1. If NO, go to question 3.6.
   2. If YES, specify the finding and your response to the finding.

Text response

1. Has your organization ever been subject to specific conditions due to program issues? YES (2) /NO (1)
   1. If NO, to go question 4.1.
   2. If YES, specify the specific condition, why is was imposed, and whether or not it is still applicable. Text response
2. **Applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on awardees.**
3. To what extent does your organization have policies to ensure programmatic expenses are reasonable, necessary and prudent (sensible)?

□ Policies are implemented and followed (1)

□ Policies are implemented, but are not consistently followed (2)

□ Policies are being implemented (3)

□ The organization does not currently have these types of policies (3)

1. To what extent does your organization have policies to ensure programmatic activities are allowable?

□ Policies are implemented and followed (1)

□ Policies are implemented, but are not consistently followed (2)

□ Policies are being implemented (3)

□ The organization does not currently have these types of policies (3)

1. Has the organization been out of compliance with any statutory, regulatory or other requirements of grant funding within the last two fiscal years? YES (3) /NO (1)

If YES, provide explanation. Text response

1. To what extent is your organization able to comply with all statutory requirements of this program?

□ Fully able to comply with all statutory requirements (1)

□ With the following exception(s), the organization is able to comply:

Text response of exception(s)

1. **Agency-specific Questions (As applicable based on terms of the Notice of Funding Opportunity)**

(Awarding agency has discretion to add additional questions specific to the delivery of services as required in the terms of funding for the specified program. *If grant or agency-specific questions are not added, the awarding agency must ensure that the applicant understands that their responses are to be specific to the associated program*.)

1. Compliance with matching, level of effort, earmarking requirements related to program delivery
2. Compliance with program income requirements related to program delivery
3. Compliance with Davis Bacon or McNamara-O’Hara Service Contract Act
4. Compliance with equipment and real property management requirements related to program delivery
5. Compliance with real property acquisition and relocation related to program delivery

**Certification Section –** By signing this questionnaire, I certify to the best of my knowledge and belief that the responses are true, complete and accurate. I am aware that any false, fictitious, or fraudulent information, or the omission of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims or otherwise. (2 CFR 200.415)

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Authorized Signature Date