



HAWNY Subrecipient Risk Assessment Worksheet Instructions

The CoC NY-508 Program Risk Analysis Worksheet must be completed by the designated staff Risk Assessment Evaluator no later than 30 days prior to awarding a new program year subcontract to an agency. The designated staff Risk Assessment Manager must approve the Risk Analysis Worksheet before a subcontract can be awarded. The original risk assessment must be included in the subcontract file.

Further instructions provided on the CoC NY-508 Program Risk Analysis Worksheet.

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FACTOR 1 – GRANT MANAGEMENT

Factor Definition: Extent to which the program participant has the capacity to carry out CoC program(s) according to established requirements.

Rating Considerations: The basis for the Evaluator's rating under this factor is derived from sources including, but not limited to, consideration of the knowledge, skills and ability of program staff, and the agencies administrative capacity to manage the grant including: the eligibility of activities and recipients; or problems such as the lack of progress in implementing a project; rapid staff and/or board turnover; major changes in the agency's mission or direction; lack of experience with Federal grants or project activities; the frequency and level of technical assistance required by the grantee before and during a project; and A-133 and Office of Inspector General (OIG) audits.

Instructions: The Evaluator should award point values to subfactors A through D.

Choose only one risk score for each subfactor from the point values listed below.

A. Reporting

Criteria: Risk is based on the subrecipient meeting report deadlines with the main consideration being on the completeness and accuracy of information contained in the reports, as well as subrecipient responsiveness.

Risk Level	Points	Description
High	5	Untimely, incomplete, or inaccurate reports OR unresponsive to HAWNY requests via email, telephone, or correspondence.
Low	0	Timely, complete, and accurate reports AND responsive to HAWNY requests via email, telephone, or correspondence.

B. Staff Capacity

Criteria: Risk is based on current staff capacity of the subrecipient in regards to its ability to ensure programmatic compliance with the regulations and fulfill all of its obligations as a subrecipient. (Key staff is defined as staff with management and administrative responsibilities for program compliance with rules and regulations, inclusive of staff assigned with oversight of any subcontracted agencies.)

Risk Level	Points	Description
High	12	<p>Key staff of the subrecipient has demonstrated an inability to administer the program as evidenced through the following:</p> <ul style="list-style-type: none"> (a) serious or numerous violations of regulations; OR (b) recurring monitoring findings or failure to resolve open findings timely; OR (c) poor performance that is ongoing that has failed to improve within a reasonable time period; OR (d) one or more vacancies for key staff have existed for more than six months; OR (e) more than 50% staff are not recipients of technical assistance; OR (f) staff has not demonstrated a basic understanding of the HUD requirements; OR (g) two or more valid complaints from the CoC Board or membership, clients, funders, project sponsors/subcontractors, or other employees about staff capacity have been received by HAWNY or HUD
Medium	8	<p>Subrecipient has experienced the following:</p> <ul style="list-style-type: none"> (a) a moderate to high turnover of staff; OR (b) at least 50% of the current staff are not recipients of technical assistance; OR (c) one or more vacancies for key program staff have existed for the past 3 to 6 months; OR (d) key program staff has been recently hired but lacks necessary experience and have not received program training

Low	0	Subrecipient experienced any of the following: (a) no program deficiencies have been identified as evidenced through violations or findings or poor performance; AND (b) any key staff vacancies have existed for less than three months; AND (c) any key staff in the past program year are recipients of technical assistance
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C. Agency HUD Programs & Grants

Criteria: Subrecipient information regarding the number of project sponsors, subcontractors, and funding sources.

Risk Level	Points	Description
High	5	Subrecipient carries out more than two HUD programs using multiple project sponsors/subcontractors/partners, which involve more than one funding source from HUD
Medium	3	Subrecipient carries out only one HUD program but has more than two grants, which involve one or more project sponsors/subcontractors/partners
Low	0	Subrecipient carries out only one HUD program with one grant, which involves no project sponsors/subcontractors/partners and only one HUD funding source

D. HUD and OIG Findings and Sanctions

Criteria: Risk is based on the monitoring of the subrecipient's program to ensure compliance with program requirements including the following: subrecipient's past performance in regards to the number of open and unresolved findings or monetary sanctions that have been imposed, and any OIG audits the subrecipient has had, or if the subrecipient has been monitored within the past three years.

Risk Level	Points	Description
High	12	Within the last three program years, the subrecipient has received findings that are still open and unresolved; OR monetary sanctions have been imposed on the subrecipient; OR HAWNY or HUD has not conducted an on-site monitoring of the program within the last three years; OR the subrecipient was barred/suspended from doing business with the federal government
Medium	8	Within the last three program years, the subrecipient has received one finding that is still open and unresolved AND HAWNY or HUD has conducted an on-site monitoring within the last three years
Low	0	The subrecipient has no open monitoring findings AND HAWNY or HUD has conducted an on-site monitoring within the last three years

FACTOR 2 – FINANCIAL MANAGEMENT

Factor Definition: Extent to which the subrecipient accounts for and manages financial resources in accordance with approved financial management standards and the amount of potential monetary exposure. The subrecipient upholds generally accepted conflict of interest policies.

Rating Considerations: The basis for the Evaluator's rating under this factor is derived from information that could be obtained from, but not limited to, financial management under applications submitted in response to the CoC Planning Grant RFP, approved or amended subrecipient agreements, audit management systems, assessment of subrecipient's drawdown history, the submission of required documents, timeliness standards and expenditure rates as they relate to financial management and history of financial activities, subrecipient performance reports, and any on-site or remote monitoring information as available.

Instructions: The Evaluator should award point values to subfactors A through C.

Choose only one risk score for each subfactor from the point values listed below.

A. Staff Capacity for Financial Compliance

Criteria: Assessment of risk for this factor is based upon financial management compliance with CoC regulations, financial management monitoring, compliance with OMB circulars, and other documentation available to the Evaluator.

Risk Level	Points	Description
High	10	Financial management staff has demonstrated a lack of knowledge or skills sets needed to administer the financial management responsibilities for the CoC Planning grant AND has one or more violations of 2 CFR 200, A-87, or A-110
Medium	5	Financial management staff has demonstrated a lack of knowledge or skills sets needed to administer the financial management responsibilities for the CoC Planning grant AND has not had any violations of 2 CFR 200, A-87, or A-110
Low	0	Financial management staff has not demonstrated a lack of knowledge or skill sets AND no financial management deficiencies have been identified as evidenced through violations or findings

B. Timely Expenditures

Criteria: The terms and conditions for timely expenditures for the CoC program can be referenced at 24 CFR 578.85. Timely expenditure of funds means funds are spent in proportion to the timeliness standards found in the CoC Planning Subrecipient Contract.

Risk Level	Points	Description
High	10	Subrecipient's performance has been untimely in the expenditure of funds in accordance with CoC regulations OR a prior problem of this nature has not been resolved
Medium	6	Subrecipient is performing adequately under a requirement to correct an identified problem OR the matter is minor in nature and is likely to be corrected
Low	0	Subrecipient's performance is satisfactory AND any prior problem was corrected AND no problems currently exist

C. A-133 Audits

Criteria: Assessment is based on the timely submission of the A-133 program audits for recipients of federal funds that expend in excess of \$750,000 on an annual basis, but special is placed on whether or not the subrecipient has received a finding or has received recommendations in a management letter based on its current accounting practices. Audits are due within 9 months from the end of the subrecipient's program year.

Risk Level	Points	Description
High	5	During the last three program years, the subrecipient has not been timely in its submission of the required A-133 audits; OR has received a finding and/or has received a recommendation in a management letter based on its current accounting practices
Low	0	None of the above applies

FACTOR 3 – SERVICES & SATISFACTION

Factor Definition: Extent to which subrecipients effectively and efficiently deliver services to intended beneficiaries/clientele and clients or beneficiaries express satisfaction or dissatisfaction with the delivery of program services.

Rating Considerations: The Evaluator should consider the planned program support and how it is appropriately being carried out to address the indeed range of housing needs and related supportive services issues, including any specialised efforts for sub-populations of homeless program participants or difficulty in serving the proposed number of participants or moving homeless program participants to permanent housing as well as considering information that could be obtained from, but not limited to: Freedom of Information Act (FOIA) requests, applicable NOFAs, approved grant amendment requests, annual performance plans, correspondence, release of funds requests, local-, HQ-, or grantee/recipient-generated automated reports or spreadsheets, correspondence or other communication to HAWNY, CoC Program recipients, or other parties with respect to the projects and any written or other responses by the CoC Program recipient, any recent problems such as citizen complaints, newspaper articles, internet postings, Congressional inquiries, and other forms of correspondence, failure to submit reports or respond to inquiries, and the loss of community support. The Evaluator should also include other functional issues related to carrying out and impacting an overall program activities, which include: environmental and wage requirements, flood insurance protection compliance as well as compliance with relocation and acquisition policies.

Instructions: The Evaluator should award point values to subfactors A through C.

Choose only one risk score for each subfactor from the point values listed below.

A. Citizen Complaints or Negative Media Exposure

Criteria: Risk is based on citizen complaints received or negative media exposure to its program.

Risk Level	Points	Description
High	4	Citizen complaints have been received during the last three program years through such sources as program participants, citizen letters, phone calls, hot line complaints, newspaper articles, internet postings, emails, etc., AND the subrecipient was found to be in violation of CoC Program regulations
Low	0	Citizen complaints have been received during the last three program years through such sources as program participants, citizen letters, phone calls, hot line complaints, newspaper articles, internet postings, emails, etc., AND the subrecipient was found not to be in violation of CoC Program regulations; OR no citizen complaints have been received during the last three program years

B. Responsiveness

Criteria: Risk is based upon the subrecipient's timely response to citizen complaints received.

Risk Level	Points	Description
High	3	Subrecipient has failed to respond or be responsive to complaints and/or citizen inquiries forwarded through HUD/HAWNY during the last three program years
Low	0	Subrecipient has responded to complaints and/or citizen inquiries; OR has not received any complaints forwarded through HUD/HAWNY within the last three program years

C. Meeting Program Objectives

Criteria: Risk is based upon subrecipient compliance with programmatic rules, policies, and procedures.

Risk Level	Points	Description
High	8	Proposed activities to be carried out by the subrecipient has not been on schedule during the most recently completed program year
Medium	5	Proposed activities to be carried out by the subrecipient was on schedule for the most recently completed program year, however, in the three most recent program years, the subrecipient has not been on schedule at least once AND the subrecipient has submitted a revised timetable or corrective action plan to come into compliance
Low	0	Proposed activities to be carried out by the subrecipient has been carried out with no known problems, has been on schedule for the three most recent program years or since sub-grant execution if less than three program years