

2024-2025 Department of Grant Compliance and Administration Risk Assessment Indicators

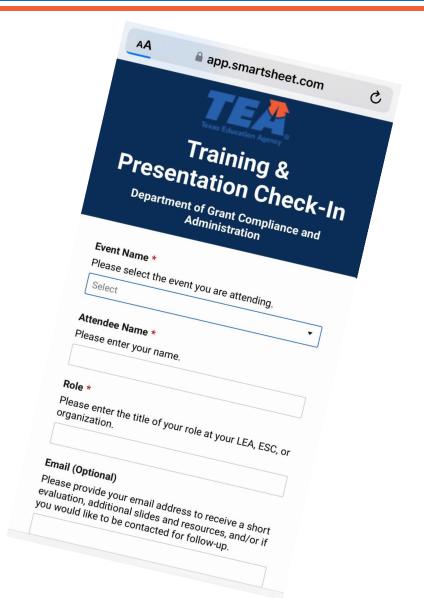
Our Process, Data, and Resources June 03, 2024

Cal Lopez, Federal Compliance Officer
Department of Grants Compliance and Administration
Texas Education Agency









Department of Grant Compliance and Administration

- 1. This presentation is intended solely to provide general information and guidance to Texas LEAs, ESCs, non-profit subgrantees, and participating Private Schools receiving equitable services. The content in this presentation reflects the Texas Education Agency's current understanding of statute and applicable federal guidance.
- 2. The content of this presentation is subject to change as a result of future guidance and or other updates provided by federal agencies with regulatory oversight of these programs.
- 3. This presentation does not constitute legal advice, and entities are, therefore, advised to seek legal counsel regarding the information and guidance provided in this presentation before acting upon the information provided.



Presentation Acronyms

FCO: Federal Compliance Officer

FFCR: Federal Fiscal Compliance and Reporting

FFM: Federal Fiscal Monitoring

FPC: Federal Program Compliance

GA: Grant Administration

GCA: Department of Grant Compliance and Administration

LEAs: School districts and open-enrollment charter schools

NCR: Non-Compliance Resolution

SMD: Special Monitoring Division



Agenda

- 2024-2025 GCA LEA Risk Assessment Indicators and Data
- Reintroduction of Previous Indicators for 2025-2026
- New Risk Assessment Resources







2024–2025 LEA Risk Assessment Indicators and Data

2 CFR§ 200.332 Requirements for Pass-Through Entities



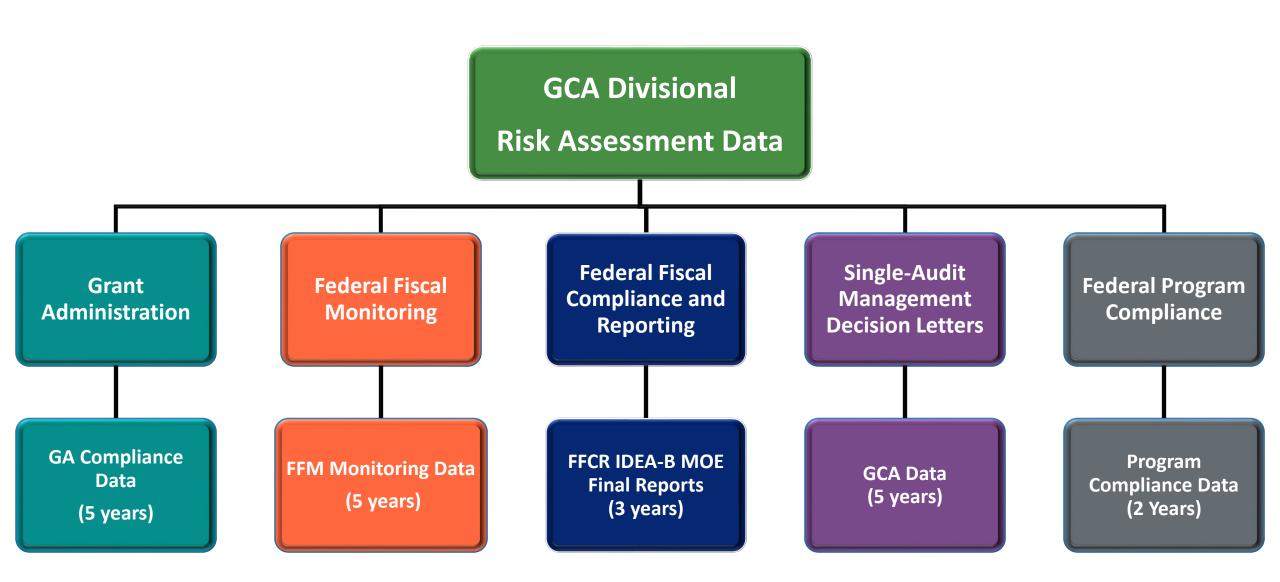
TEA as a pass-through entity is required under Title 2 of the Code of Federal Regulations (CFR), <u>2 CFR §200.332(b)</u>, to evaluate each sub-recipient <u>risk of non-compliance</u> with Federal statutes, regulations, and the terms and conditions of the sub-award for purposes of determining the appropriate sub-recipient monitoring as described in <u>2 CFR §200.332(d)(e)</u>, which may include the sub-recipients results of previous audits, including <u>Single-Audits</u> in accordance with <u>2 CFR §200.332(f)</u>, <u>changes to key personnel</u>, and other factors that may reflect any patterns of non-compliance.



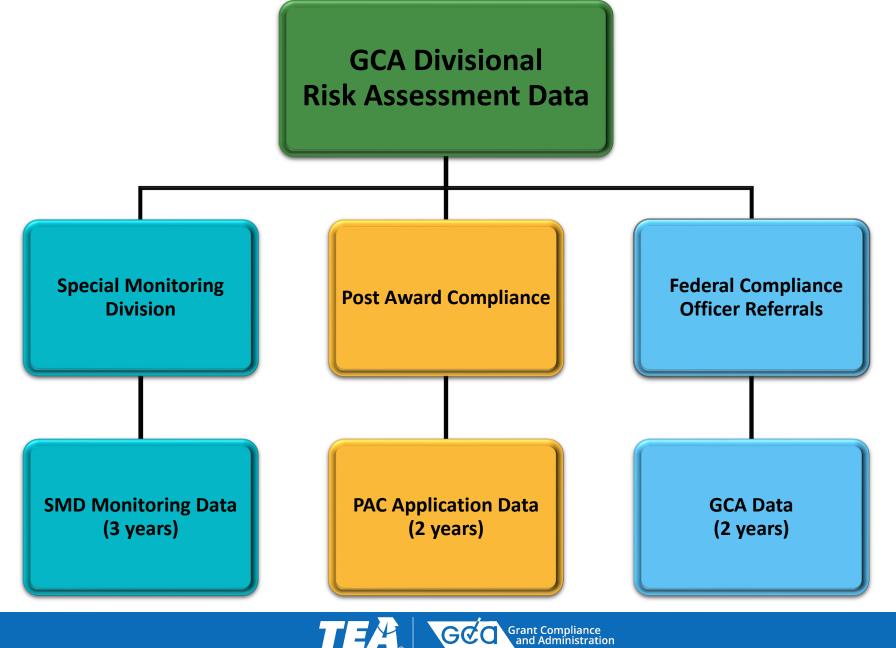
Department of Grant Compliance and Administration Annual Risk Assessment

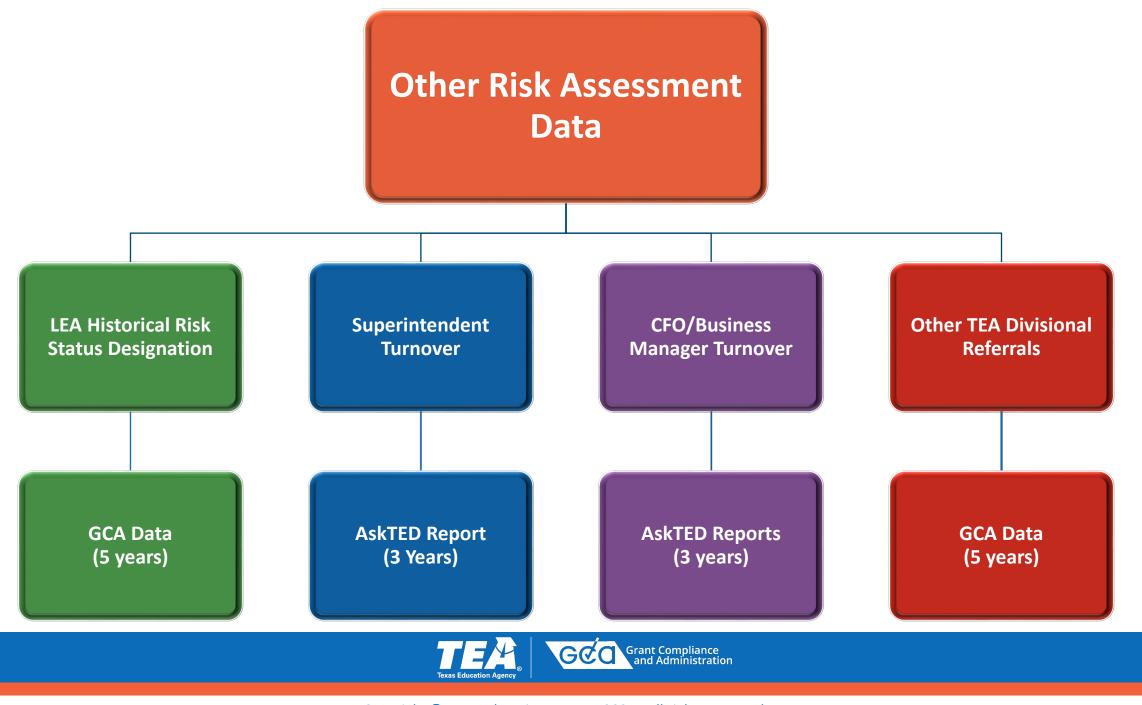


To comply with this requirement, the Federal Compliance Officer conducts an annual risk assessment of all sub-recipients to determine and mitigate any potential risk of non-compliance. Based on the outcome of the annual risk assessment, sub-recipients are assigned a risk status of low, medium, or high, which is evaluated annually.









2024-2025 Risk Assessment Indicators, Data, and Points

2024-2025 Indicators	Data Period	Data Source	Max Points
I-1: Single-Audit Management Decisions Letters	FY20-FY24	GCA Reports	10 Points
I-2: IDEA-B LEA MOE Non-Compliance Final Report	FY22-FY24	FFCR Reports	9 Points
I-3: Monitored by FFM with Final Report Findings	FY19-FY23	FFM Monitoring Reports	10 Points
I-4: Monitored by SMD with Final Report Findings	FY21-FY23	SMD Monitoring Reports	9 points
I-5: An LEA had grant management compliances concerns	FY20-FY24	GA Reports	10 Points
I-6: An LEA had post award significant issues with their program applications	FY23-FY24	PAC Report	4 Points
I-7: Other TEA Division Risk Assessment Referrals	FY20-FY24	GCA Referral Reports	10 Points
I-8: Superintendent Turnover	FY22-FY24	GCA AskTED Reports	10 Points
I-9: CFO/Business Manager Turnover	FY22-FY24	GCA AskTED Reports	10 Points



2024-2025 Risk Assessment Indicators, Data, and Points

2023-2024 Indicators	Data Period	Data Source	Max Points
I-10: An LEA is not required to conduct a single audit in FY23 as required per, 2 CFR§ 200.501	FY23	GCA Reports	5 Points
I-11: LEA percentage of disallowed costs in final monitoring report	FFM: FY19–FY23 SMD: FY21–FY23	FFM Monitoring Reports SMD Monitoring Reports	10 Points
I-12: FPC Random Validation Non-Compliance	FY22-FY23	FPC Reports	10 Points
I-13: FPC Non-Compliance Issues	FY22-FY23	FPC Reports	10 Points
I-14: An LEA has not been fiscally monitored within the past five years.	FY19-FY23	FFM and SMD Monitoring Reports	10 Points
I-15: LEA Risk Level Status Designation Change	FY20-FY24	GCA Risk Level Designation Reports	10 Points
I-16: An LEA has been appointed a Board of Managers by the Commissioner of Education under <u>TEC§ 39A.004</u> and the Board of Managers still governs the district	Current Status	Sanctions and Monitoring Reports	10 Points

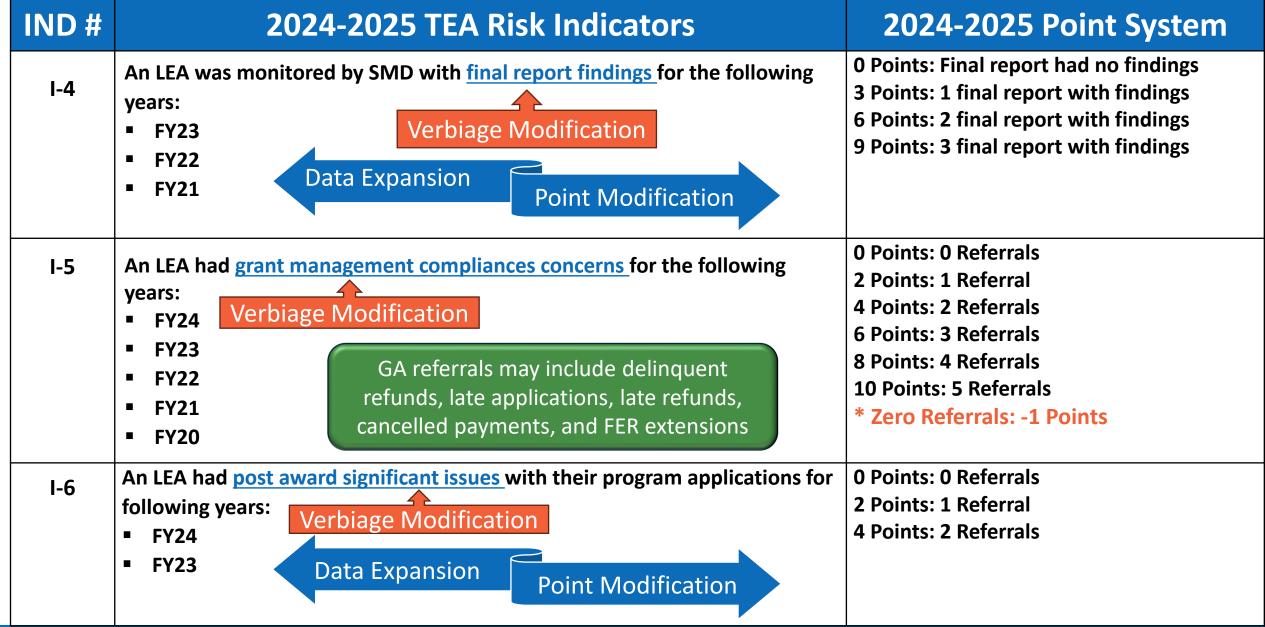


2024-2025 Risk Assessment Indicators, Data, and Points

2023-2024 Indicators	Data Period	Data Source	Max Points
I-17: An LEA is currently served by a Fiscal Conservator, appointed by the Commissioner of Education under TEC§ 39A.002	Current Status	Sanctions and Monitoring Reports	6 points
I-18: Ad Hoc Referrals to the Federal Compliance Officer	FY23-FY24	GCA Data	10 Points
I-19: Number of <u>overdue refunds or non-compliance</u> <u>documents</u> from required non-compliance resolution actions past the requested deadline	FY23-FY24	GCA Data	10 Points
I-20: TEA High-Risk Designation, 2 CFR§ 3474.10	FY24	TEA GCA Designation	Automatic High- Risk Designation

IND#	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-1	An LEA has received a single-audit management decision letter with sustained findings for the following years: FY24 FY23 Verbiage Modification FY22 FY21 FY20 Letter was sent	0 Points: 0 Letters 2 Points: 1 Letter 4 Points: 2 Letters 6 Points: 3 Letters 8 Points: 4 Letters 10 Points: 5 Letters *Zero Letters: -2 Points
I-2	An LEA was non-compliant for IDEA-B LEA MOE for the following years: FY24 FY23 Data Expansion Point Modification	0 Points: Compliant Final Report 3 Points: 1 Non-Compliant Final Report 6 Points: 2 Non-Compliant Final Reports 9 Points: 3 Non-Compliant Final Reports *Zero Non-Compliant Final Reports: -2 Points
I-3	An LEA was monitored by FFM with <u>final report findings</u> for the following years: FY23 FY22 FY21 FY20 FY19	0 Points: Final report had no findings 2 Points: 1 final report with findings 4 Points: 2 final reports with findings 6 Points: 3 final reports with findings 8 Points: 4 final reports with findings 10 Points: 5 final reports with findings







IND#	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-7	An LEA was referred for Risk Assessment by other TEA divisions for the following years: FY24 FY23 FY22 FY21 FY20	0 Points: 0 Referrals 2 Points: 1 Referral 4 Points: 2 Referrals 6 Points: 3 Referrals 8 Points: 4 Referrals 10 Points: 5 Referrals
I-8	An LEA has experienced Superintendent turnover over for the following years. FY24 FY23 FY22 *FY21 Baseline data	0 Points: No Changes in Superintendent 2 Points: 1 Change in Superintendent 4 Points: 2 Changes in Superintendent 6 Points: 3 Changes in Superintendent 8 Points: 4 Changes in Superintendent 10 Points: 5 Changes in Superintendent



IND#	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-9	An LEA has experienced CFO/Business Manager turnover for the following years. FY24 FY23 FY22 *FY21 Baseline data	0 Points: No Changes in CFO/Business Manager 2 Points: 1 Change in CFO/Business Manager 4 Points: 2 Changes in CFO/Business Manager 6 Points: 3 Changes in CFO/Business Manager 8 Points: 4 Changes in CFO/Business Manager 10 Points: 5 Changes in CFO/Business Manager
I-10	An LEA was not required to conduct a single audit in FY23 as required per 2 CFR§ 200.501.	O Points: Is required to submit single audit 5 Points: Not Required to conduct a single audit



IND#	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-11	An LEA was monitored by FFM or SMD and had disallowed costs in the final report for the following years: FY23 FY22 Verbiage Modification FY21 FY20 FY19	O Points: Final report with no disallowed costs 2 Points: 1 final report with disallowed costs 4 Points: 2 final reports with disallowed costs 6 Points: 3 final reports with disallowed costs 8 Points: 4 final reports with disallowed costs 10 Points: 5 final reports with disallowed costs *Zero Disallowed Costs: -1 Point
I-12	During FY22 or FY23 an LEA was referred for Non-Compliance Resolution for two years as non-compliant during for Random Validation (2 years non-compliant). Programs included in this indicator are: Title I, Part A Title I, Part C Title I, Part D Title II, Part A Title IV, Part A Title V, Part B Ed-Flex Private Nonprofit School Equitable Services Unsafe School Choice Option	New Indicator 0 Points: 0 Referrals 2 Points: 1 Referral 4 Points: 2 Referrals 6 Points: 3 Referrals 8 Points: 4 Referrals 10 Points: 5 Referrals



	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-13	During FY22 or FY23 an LEA had Federal Program non-compliance issues for the following: Late or no submission of their ESSA Consolidated Compliance Report Not in Compliance on their ESSA Consolidated Compliance Report Program Compliance Self-Check Requirements Programs included in this indicator are: PR1000 – Title I, Part A PR1200 – Title I, Part C PR2000 – Title I, Part D PR3000 – Title II, Part A PR3002 – Title III, Part A PR3114 – Title III, Part A PR3117 – Title IV, Part A PR3099 – Private Nonprofit School Equitable Services PR6200 – Unsafe School Choice Option	New Indicator 0 Points: No Referrals 2 Points: 1 Referral 4 Points: 2 Referrals 6 Points: 3 Referrals 8 Points: 4 Referrals 10 Points: 5 or more Referrals



IND#	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-14	An LEA has not been fiscally monitored by the Department of Grants Compliance and Administration within the past five years.	10 Points
	This indicator will include LEAs who are being currently being monitored by FFM and SMD.	
I-15	An LEA's historical Risk Status Designation for the following years: FY24 FY23 FY22 FY21 FY20	0 Points: Low Risk status for each fiscal year 1 Point: Medium Risk status for each fiscal year 2 Points: High Risk status for each fiscal year Total Possible Points: 10 *Low Risk status for all five years: -1 Point
I-16	An LEA has been appointed a Board of Managers by the Commissioner of Education under TEC§ 39A.004 and the Board of Managers still governs the district.	10 Points



	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-17	An LEA is currently being served by a Fiscal Conservator, appointed by the Commissioner of Education under TEC\$ 39A.002 .	6 Points
I-18	Ad Hoc Referrals to the Federal Compliance Officer for the following projects: • Year Four USDE ESSER Delinquent Reporting • Programmatic non-compliance • Open Investigations for misuse of federal funds • Other referrals	0 Points: No Referrals 2 Points: 1 Referral 4 Points: 2 Referrals 6 Points: 3 Referrals 8 Points: 4 Referrals 10 Points: 5 Referrals

	2024-2025 TEA Risk Indicators	2024-2025 Point System
I-19	Number of overdue refunds or non-compliance documents from required non-compliance resolution actions past the requested deadline for the following years: FY23 FY24	0 Points: On-time refunds and documents 1 Points: 1 Overdue refund or documents 2 Points: 2 Overdue refunds or documents 3 Points: 3 Overdue refunds or documents 4 Points: 4 Overdue refunds or documents 5 Points: 5 Overdue refunds or documents 6 Points: 6 Overdue refunds or documents 7 Points: 7 Overdue refunds or documents 8 Points: 8 Overdue refunds or documents 9 Points: 9 Overdue refunds or documents 10 Points: 10 Overdue refunds or documents
I-20	Per <u>2 CFR§ 3474.10</u> , TEA is authorized to designate a federal grant subrecipient as a high-risk grantee.	Automatic TEA High-Risk Status Designation



I-20 Federal High-Risk Grantee Designation

- TEA is authorized to designate a federal grant subrecipient as a high-risk grantee, and to impose specific conditions upon that subrecipient, by Title 2 of the Code of Federal Regulations (CFR), 3474.10.
- TEA may make a high-risk grantee designation in and impose specific conditions on LEAs state and federal grants administered through TEA for reasons including, but not limited to:
 - 1. Prior high-risk grantee status issued by U.S. Department of Education.
 - 2. Findings from the Comprehensive Independent Audit of Departmental Grants.
 - 3. Findings in other external audits related to federal funds.



I-20 Federal High-Risk Grantee Designation – Specific Conditions

Specific conditions imposed by TEA on federal grants may include:

1. Requiring payments as reimbursements rather than advance payments. Your organization would no be able to draw down funds automatically using TEA's expenditure

reporting (ER) system.

2. Requiring additional, more detailed financial reports.

Your organization would not be able to draw down its funds automatically using TEA's expenditure reporting system (ER). Your organization would be required to submit all its unreimbursed expenditures to TEA at least once each month for each federal grant and include fiscal records such as general ledgers, payroll journals, and source documents. If your organization does not have any expenditures for a given month, you must notify TEA. Your organization must ensure that each reimbursement request is for funds that have already been obligated and recorded in the general ledger.

3. Requiring additional project monitoring.

Before approving payment, TEA would randomly review financial records submitted by your organization for compliance with each grant's general and specific federal requirements.



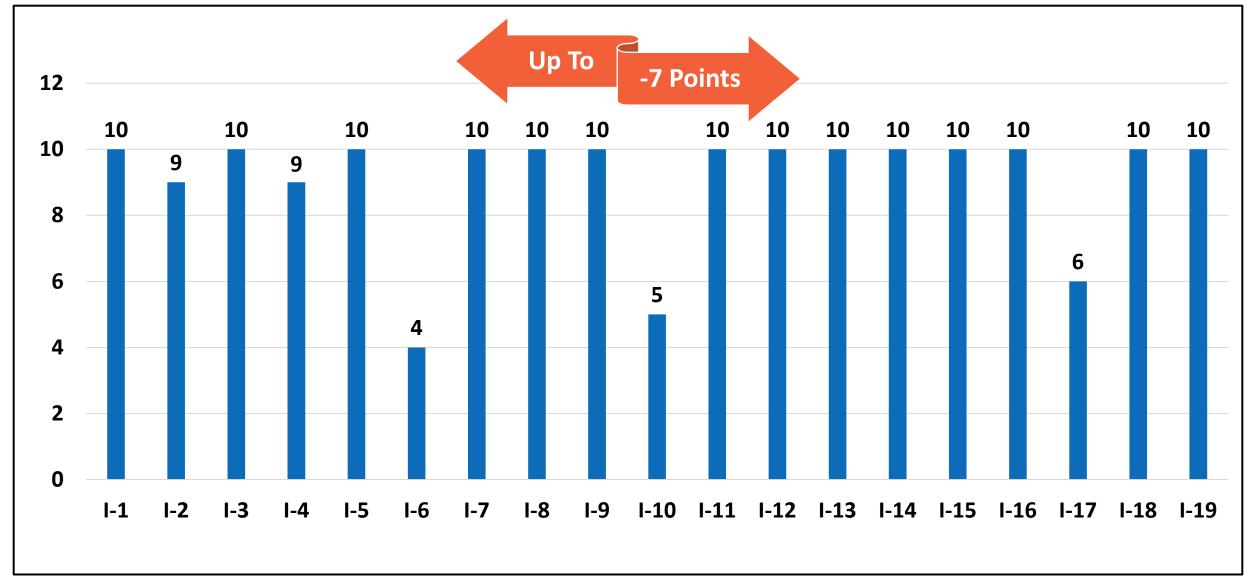
2024-2025 Risk Assessment Designations

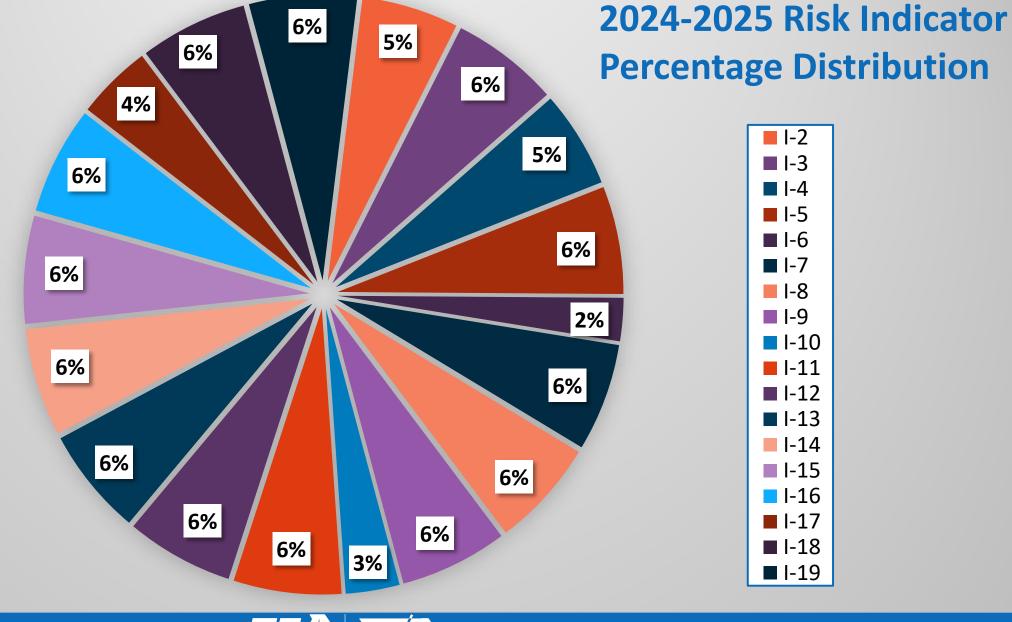
LEA Risk Assessment Status Designations of High, Medium, and Low Assist TEA with:

- Evaluating each sub-recipient's risk of non-compliance as required under Title 2 of the Code of Federal Regulations (CFR), <u>2 CFR §200.332(b)</u>
- Developing our GCA annual sub-recipient monitoring plan as as described in <u>2 CFR §200.332(d)(e)</u>
- Determining patterns of fiscal and program on non-compliance
- Providing technical assistance, training, and resources for LEAs



2024-2025 Risk Indicator Point Distribution





Expansion of Risk Assessment Indicators for 2024-2025

Data Expansion

FFCR 3Years PAC 2 Years SMD 3 Years

2 Years

FCO







Questions, Wonderings, or Comments





TEA Department of Grant Compliance and Administration had placed several indicators on hold due to stimulus funding. These indicators took into consideration the following criteria as part of the risk assessment process:

- High carryover of grant funds
- Lapsed grant funds
- Concerns regarding the timely drawdown of grant funds
- Large amounts of federal expenditures compared to total operating costs

These risk indicators will be reintroduced for the 2025-2026 Risk Assessment process.





An LEA has carried over excessive amounts of funds for grants awarded in the following applications:

- IDEA-B Over 50% Carryover
- Carl D. Perkins Over 25% Carryover
- Every Student Succeeds Act (ESSA) Consolidated Grant includes:
 - Title I, Part A Over 15% Carryover
 - Title I, Part C Over 25% Carryover
 - Title I, Part D Over 25% Carryover
 - Title II, Part A Over 25% Carryover
 - Title III, Part A Over 25% Carryover
 - Title IV, Part A Over 25% Carryover





An LEA has lapsed funds for grants awarded in the following applications:

- IDEA-B
- Carl D. Perkins
- Every Student Succeeds Act (ESSA) Consolidated Grant includes:
 - Title I, Part A
 - Title I, Part C
 - Title I, Part D
 - Title II, Part A
 - Title III, Part A
 - Title IV, Part A





An LEA has not drawn down federal grant funds by January 31, 2025 for the following grants:

- IDEA-B
- Carl D. Perkins
- Title I, Part A





- An LEA had a large amount of federal expenditures compared to total operating costs.
 - Points will be awarded if the percentage is greater than 20% of the total operating costs.



AskTED Updates

Popular Applications AskTED

ECOS for Educators Grant Opportunities

Secure Applications

TEAL Login

TSDS

Help To Desk

Search

Search tea.texas.gov



TEXAS EDUCATION AGENCY

Search by

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espondence

AskTED

ASKILD

Quick District Lookup

rict Reports and Directories

Search RESCs

Administrative Logon Help

Welcome to AskTED

Use the drop-down menus above in order to access the Texas Education Directory Customized Reports and Data Files. Under the Search by menu, you will find searches for School, District, County, Region, and Texas.

AskTED is updated daily. Information downloads should be made as close as possible to the time the information will be used, particularly when downloading email addresses.

Texas Education Director

For further assistance, click this first time user link, (requires the free Adobe Acrobat Reader) or the Help link in the menu bar.

Questions about the Texas Education Directory or the AskTED website? - Contact AskTED.

Questions or comments about other matters related to public education in Texas? - Please go to http://www.tea.texas.gov/contacttea.aspx.

Explanatory Materials

- AskTED Quick Reference
- Understanding Organization ID Numbers in AskTED
- Understanding the Three ESC Regions in AskTED

State-Wide School and District Downloads

- Download School and District File
- · Download School and District File with Site Address
- Download Archived School and District Data Files

TED Administrator Resources

Apply for Administrator Login

Keep LEA contacts up to date! This is our data source for I-8 and I-9





AskTED Updates for Charter Schools



Home / Texas Schools / Charter Schools

Charter Schools

- Updates to Charter School AskTed information should be sent to <u>CharterAskTED@tea.Texas.gov</u>
- Once your organization's information is received, the Charter School Division will update the AskTED information provided.

Contact Information

Division of Authorizing charterschools@tea.texas.gov

Phone (512) 463-9575

For additional support, email the following as appropriate:

- Charter Application
- Charter Application @ tea. texas. gov
- Charter Amendments or Revisions

CharterAmendments@tea.texas.gov

Remote Learning

Remote.Learning@tea.texas.gov

AskTED Assistance

CharterAskTED@tea.texas.gov

Authorizing Staff









Risk Assessment Resources

Updated Risk Assessment Webpage



Home / Finance and Grants / Grant Compliance and Administration / Grants Administration

Risk Assessment





The Texas Education Agency, as a pass-through entity, awards federal grant funds to eligible sub-recipients, including local educational agencies (LEAs), which include both school districts and open-enrollment charter schools, education service centers (ESCs), and non-profits. TEA as a pass-through entity is required under Title 2 of the Code of Federal Regulations (CFR), 2 CFR §200.332(b), to evaluate each sub-recipient risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the sub-award for purposes of determining the appropriate sub-recipient monitoring as described in 2 CFR §200.332(d)(e), which may include the sub-recipients results of previous audits, including Single-Audits in accordance with 2 CFR §200.332(f), changes to key personnel, and other factors that may reflect any patterns of non-compliance.

The Federal Compliance Officer in the Department of Grant and Administration (GCA) manages all GCA Risk Assessment activities, data, technical assistance, and training.

To comply with this requirement, the Federal Compliance Officer conducts an annual risk assessment of all subrecipients to determine and mitigate any potential risk of non-compliance. Based on the outcome of the annual risk assessment, sub-recipients are assigned a risk status of low, medium, or high, which is evaluated annually.

Federal Fiscal Monitoring

Annual Federal Fiscal Risk Assessment

Corrective Actions Related to Federal Grants

Information for Organizations Selected for a

Monitoring of Single-Audit Findings

Statutory Authority for Monitoring

Contact Information

Department of Grant Compliance and Administration

Cal Lopez

Federal Compliance Officer

Phone: (512) 463-9017

Email: noncompresolution@tea.texas.gov













Risk Assessment Webpage

Access Your Risk Assessment Status Designation Report

Risk Assessment





2024-2025 Risk Assessment Status Designation Reports

LEAs can access their 2024-2025 Risk Assessment Status Designation Report, by following the steps below:

- 1. Access the TEA Smartsheet WorkApps site: https://workapps.smartsheet.com/
- 2. Select Risk Assessment WorkApps.
- 3. Select LEA Name and CDN when the 2024-2025 GCA Risk Assessment page displays.
- 4. Click on the Attachments link and click on the LEA RA Report.pdf title.
- 5. The report will download to your computer's download folder.
- 6. Click on the downloaded report to view your 2024-2025 LEA Risk Assessment Status Designation Report.
- 7. Each LEA report includes points assigned by indicator, total risk assessment score, and risk status designation for 2024-2025.

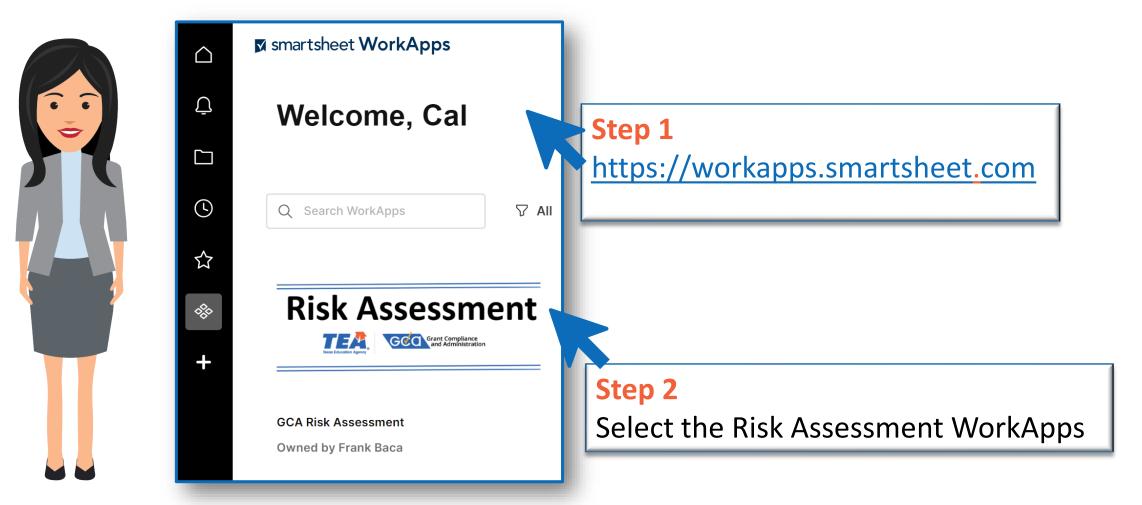
The FY19-FY24 Risk Status Designation Report is also accessible by following the steps above. As new reports are published, they will also be added to the navigation pane for easy access and review, ensuring that all relevant information is readily available for LEAs.

LEA administrators with current, active Smartsheet access to other TEA WorkApps (EDGAR, FPC, ESSER Compliance, etc.) will be able to view the Risk Assessment WorkApps, and new users will need to be added through the EDGAR WorkApps. With the assistance of your TEA WorkApps, send an email request to frank.baca@tea.texas.gov.

For questions regarding 2024-2025 Risk Assessment scores or status, contact Cal Lopez, the TEA Federal Compliance Officer, at noncompresolution@tea.texas.gov or 512-463-9017.

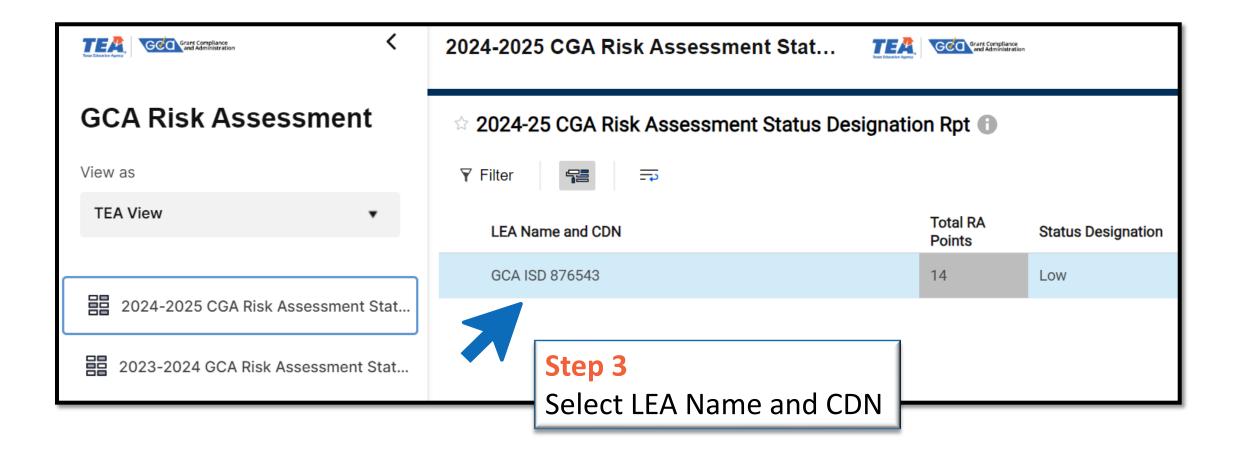


TEA GCA Risk Assessment WorkApps

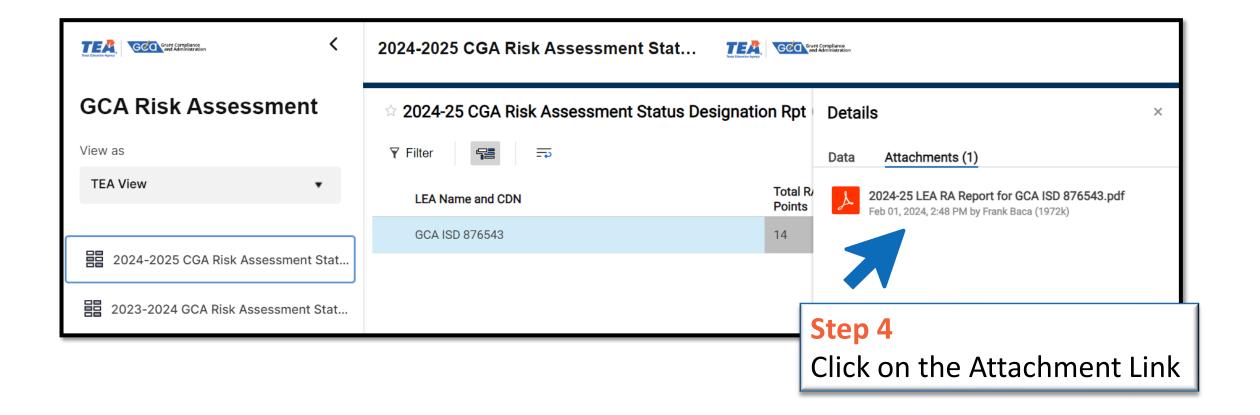




GCA ISD Risk Assessment Status Designation Reports



GCA ISD Risk Assessment Status Designation Report



2023-2024 Risk Assessment Status Designation Report





GCA ISD 876543	Risk Assessment Status Designation Report	
2023-2024	Low	

2023-2024 Risk Assessment Indicator	Fiscal Year	Risk Points Earned
I-1: Management Decisions Letters	☐ FY22 ☐ FY21 ☐ FY20 ☐ FY19 ☐ FY18	-2
I-2: IDEA-B LEA MOE Non-Compliance	☑ FY23 ☐ FY22	3
I-3: Monitored by FFM	□ FY22 □ FY21 □ FY20 □ FY19 □ FY18	0
I-4: Monitored by SMD	□ FY22 □ FY21	0
I-5: Grants Administration Risk Assessment Referral	□ FY23 □ FY22 □ FY21 □ FY20 □ FY19	-1
I-6: Post Award Compliance (PAC) Referral	□FY23	0
I-7: Other TEA Division Risk Assessment Referrals	□FY24 □FY23 □FY22 □FY21 □FY20	0
I-8: Superintendent Turnover	□ FY21 - FY23	0
I-9: CFO/Business Manager Turnover	☑ FY21 - FY23	3





2024-2025 Risk Assessment Status Designation Report





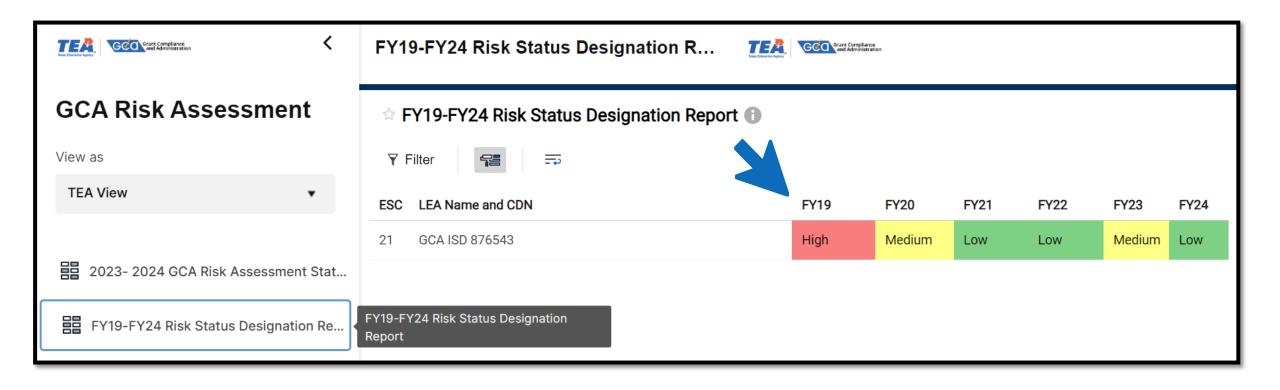
GCA ISD 876543	Risk Assessment Status Designation Report	
2024-2025	Low	

2024-2025 Risk Assessment Indicator	Fiscal Year	Risk Points Earned
I-1: Management Decisions Letters	□ FY21 □ FY20	
	□FY19 □FY18	-2
	□FY17	
I-2: IDEA-B LEA MOE Non-Compliance	☑ FY22 □ FY21	3
I-3: Monitored by FFM	□FY22	
	□ FY21 □ FY20	0
	□FY19	0
	□FY18	
I-4: Monitored by SMD	□FY22	0
	□FY21	U
I-5: Grants Administration Risk Assessment Referral	□FY23	
Keterral	□FY22 □FY21	-1
	□FY21 □FY20	-1
	□FY19	
I-6: Post Award Compliance (PAC) Referral	□FY23	0
I-7: Other TEA Division Risk Assessment	□FY24	
Referrals	□FY23	
	FY22	0
	□ FY21 □ FY20	
I-8: Superintendent Turnover	☐FY21 - FY23	0
I-9: CFO/Business Manager Turnover	☑ FY21 - FY23	3





LEA Historical Risk Assessment Data



FY19-FY24 Risk Assessment Status Designation Report





GCA ISD 876543	Risk Assessment Status Designation Report
2019-2024	

2019-2024 Risk Assessment Indicator	Fiscal Year	Status
LEA Risk Status Designation	✓ FY24	Low
	✓ FY23	Medium
	✓ FY22	Low
	₽ FY21	Low
	FY20	Medium
	✓ FY19	High

For questions related to your 2019-2024 Risk Status Designation contact Cal Lopez, the TEA Federal Compliance Officer, at NonCompResolution@tea.texas.gov or 512-463-9017.





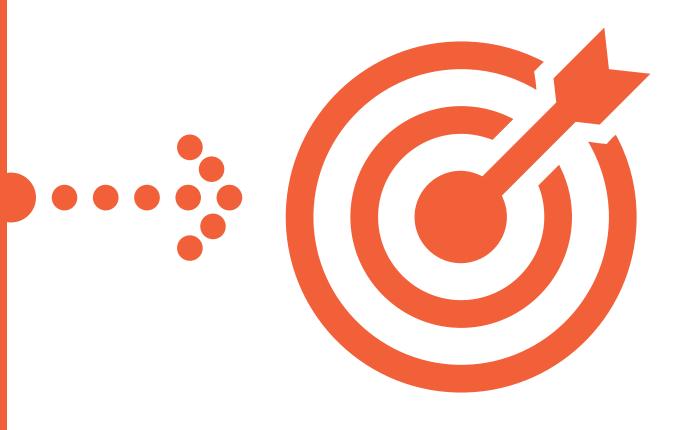
2024-2025 Risk Assessment Next Steps





2024-2025 LEA Risk Assessment Target Release Date

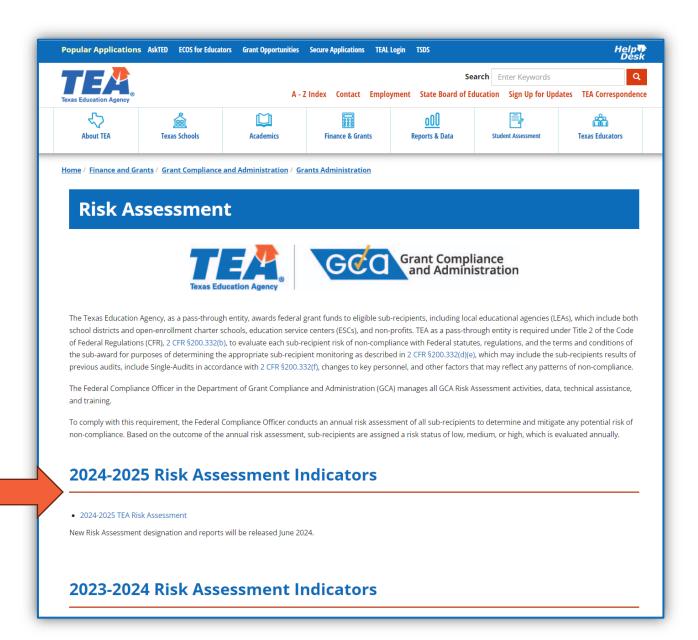








Risk Assessment Website



Contact Information





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Presentation Feedback - How Did We Do?









Thank you!