

**Date Established:** 05/01/2011  
**Date Last Revised:** 03/01/2017  
**Date Posted to Website:** 03/28/2017  
**Status:** Final  
**Supersedes:** Monitoring #123

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## **Purpose**

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To establish an oversight system of program and financial activities of subrecipients through monitoring and technical assistance in compliance with federal and state requirements.

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## **Policy**

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PacMtn is responsible for formal and continuous monitoring of its contractually funded subrecipients. In addition, PacMtn will formally monitor all subrecipients receiving state or federal dollars in accordance with the grant requirements. PacMtn will provide technical assistance as necessary. PacMtn fulfills this statutory responsibility described in WIOA Section 183 and OMB 2 CFR Part 200.

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## **Guidelines**

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PacMtn will ensure that subrecipients are in compliance with state and federal guidance while using federal funds to achieve the outcomes and deliverables of the program under which they are funded. PacMtn will conduct annual monitoring of subrecipients or staff working on behalf of the programs using the following guidance:

1. PacMtn has established and adheres to appropriate systems for award and monitoring of contracts with subrecipients. The system contains acceptable standards for accountability;
2. PacMtn enters into contracts with subrecipients that establish clear goals and obligations in unambiguous terms;
3. PacMtn will evaluate each subrecipient's risk of non-compliance with Federal statutes, regulations, and the terms and conditions incorporated in the contract. Determining risk factors could include, but not limited to:
  - a. The subrecipient's prior experience with similar contracts.
  - b. The results of previous audits and/or monitoring and the extent to which the same or similar contract has been reviewed.
  - c. Whether the subrecipient has new personnel or new or substantially changed systems.
  - d. Subrecipient's budget amount in relation to the grant budget.

4. PacMtn takes prompt and appropriate corrective action upon becoming aware of any evidence of violation of WIOA, associated regulations, state provisions, PacMtn policy, and subrecipient agreements.

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## References

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20 CFR Part 683.410;  
OMB 2 CFR Part 200

**DATE APPROVED: March 10, 2017**

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**PACIFIC MOUNTAIN WORKFORCE DEVELOPMENT COUNCIL  
Subrecipient Initial Risk Assessment**

Subrecipient Name:	Fund Source:	CFDA:
Program Name:		
Agreement #:		
Term of Agreement:		

**Initial Risk Assessment (Circle):                      LOW                      MODERATE                      HIGH**

Purpose: to document the initial risk assessment related to the specific Subrecipient in order to plan for the related monitoring efforts during the program term.

Instructions: Assign a value from 1 to 3 corresponding to the initial risk assessment related to the potential for noncompliance by the subrecipient. [Low=1 and High=3]

Evaluation Item Description	(Circle One)		
	1	2	3
1. Results of prior monitoring			
2. Results of prior audit reports			
3. Frequency and type of audit performed for the subrecipient (annual basis & Single Audit is generally lowest risk).			
4. Experience of staff with administering grant monies.			
5. Experience of staff with administering similar subawards.			
6. Nature and extent of complexities associated with the subaward rules & regulations.			
7. Familiarity of staff with this grant's rules & regulations.			
8. Size of this award in comparison to other grants administered by the subrecipient.			
9. Size of this award in comparison to other awards made by the WDC.			
10. Term of the grant (longer terms generally have more risk).			
11. Number of enrollments, and, level and types of service.			

**Total sum of numbers circled above is equal to:** \_\_\_\_\_

Determine the initial risk assessment using the following guidelines:

Total value is:                      Less than 16, then risk is Low;  
                                                  More than 24, then risk is High;  
                                                  Other values indicate risk is Moderate.

Refer to monitoring policy and guidelines for planned monitoring effort relative to above risk assessment.

Program Manager: \_\_\_\_\_ Date: \_\_\_\_\_