



FLORIDA DEPARTMENT OF
EDUCATION
fldoe.org

Division of Public Schools

2021-2022

ESEA Federal Programs

Universal Risk Assessment Methodology

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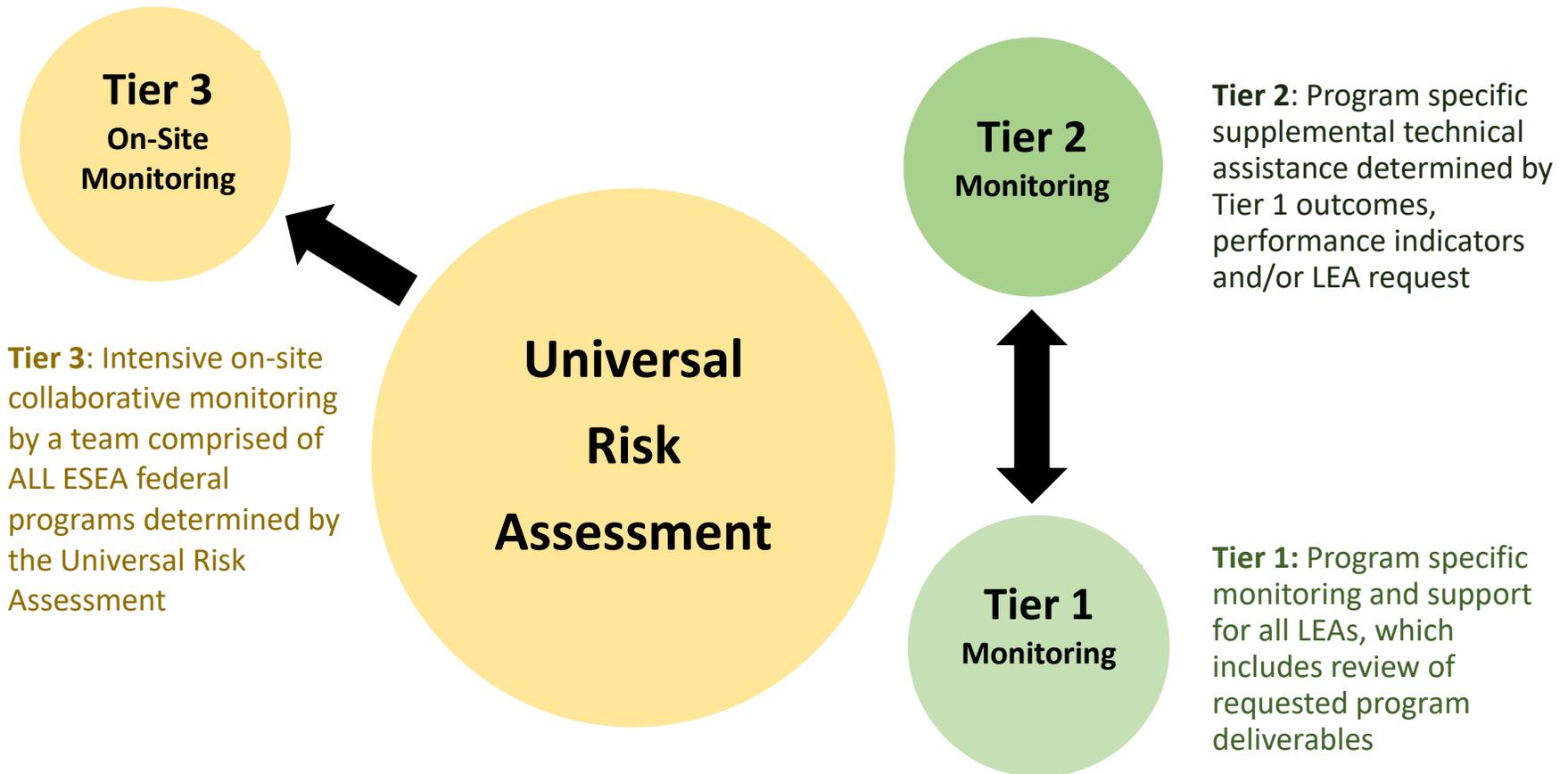
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Universal Monitoring System

The Florida Department of Education (FDOE) Universal Monitoring System is designed to define a tiered support system to be used by all K12 ESEA federal programs. This system identifies the levels of tiered support provided to each Local Education Agency (LEA). Program specific monitoring will be provided for all LEAs and support will be customized based on need or request.



Legal Authorities

Office of Management and Budget (OMB) Uniform Guidance (UG), Section 200.331(b) indicates that pass-through entities must “evaluate each subrecipient’s risk of non-compliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring...” As such, FDOE is obligated to monitor its high-risk LEA subrecipients to ensure that federal awards are spent properly and the subrecipient complies with all applicable federal statutes, regulations, and grant terms and conditions. To comply with this requirement, FDOE conducts an annual risk assessment of all subrecipients, including local educational agencies, to determine their potential risk of noncompliance.

Universal Risk Assessment

The overall goal of the Universal Risk Assessment is to identify LEAs that are high risk, who will receive Tier 3 intensive on-site collaborative monitoring by a team comprised of all ESEA federal programs staff. The Universal Risk Assessment contains common programmatic, administrative and fiscal risk indicators used to generate a composite risk score for each LEA. Based upon the outcome of the risk assessment, LEAs are assigned a risk level of low, medium, or high.

High risk does not necessarily mean that an LEA is not performing the requirements of the program, federal regulations, or administrative procedures. It means that an LEA may be at a higher risk of having program elements that could cause an LEA to not perform the activities aligned with federal rules, regulations, and administrative procedures in a manner that keeps the LEA in compliance.

The Universal Risk Assessment accomplishes the following objectives:

- Identifies the areas that represent the highest degree of risk for an LEA;
- Identifies any “red flags” and/or serious problems as quickly as possible to support the immediate needs of the LEA; and
- Assists FDOE staff to formulate a comprehensive plan for developing resources and delivering technical assistance services to meet the unique needs of LEAs.

Federal Programs included in the 2021-22 Universal Monitoring System

- Title I, Part A – Improving Academic Achievement of the Disadvantaged
- Title I, Part C – Education of Migratory Children
- Title I, Part D – Neglected & Delinquent Youth
- Title II, Part A – Supporting Effective Instruction
- Title III, Part A – English Language Acquisition, Language Enhancement and Academic Achievement
- Title IV, Part A – Student Support and Academic Enrichment
- Title V, Part B – Rural and Low-Income Schools
- Title IX, Part A – McKinney-Vento Program

Overall Risk Score and Monitoring Determination

Risk is evaluated to determine the chance of an adverse impact of an LEA achieving grant and compliance requirements. The 2021-22 Universal Risk Assessment analyzes quantifiable data points/indicators and risk criteria levels to determine a total risk score for each LEA. The individual scores of each of the risk indicators are added together to determine the composite risk score for each LEA. The LEA's composite score is then used to determine an overall risk level of Low, Medium or High. LEAs with composite score of 66 to 85 are determined to have a High level of risk and may be selected for Tier 3 intensive on-site collaborative monitoring conducted by a team comprised of ALL ESEA federal programs. Regardless of a district's risk score, FDOE reserves the right to provide Tier 3 monitoring and support, if necessary. FDOE will determine what specific monitoring activities will be conducted based on the Department's available resources.

FDOE's goal in Tier 3 monitoring is to increase the capacity of LEAs so that they are aware of the requirements of the federal funds, have the ability to self-assess against the requirements of the grants and understand how they can better utilize funding to improve services for children.

2021-22 Universal Risk Assessment Indicators

- 1. Percent of schools in the district identified for Comprehensive Support & Improvement (CSI) (most recent school year available):** Schools are identified for CS&I based on their Federal Percent of Points Index. A higher percentage of CS&I schools within the district may indicate lower student academic performance.
- 2. Percent of schools in the district identified for Targeted Support & Improvement (TSI) (most recent school year available):** Schools are identified for TS&I based on their Federal Percent of Points Index. A higher percentage of TS&I schools within the district may indicate lower student academic performance.
- 3. Total allocation of federal grants, current fiscal year:** An LEA with a higher total allocation poses a greater risk to the federal funds than does an LEA with a smaller total allocation, as issues of non-compliance could result in greater financial consequences.
- 4. Total number of federal grants received, current fiscal year:** LEAs with more federal grants to manage may pose greater risk, depending on the LEA's internal controls.
- 5. Percent of unexpended federal funds (most recent fiscal year available):** A large percentage of unexpended funds for a given fiscal year may indicate that the LEA did not provide the full scope of services as described in its approved grant application.
- 6. Timeliness of grant applications:** The timeliness of an LEA's grant application can indicate the quality of its internal controls.
- 7. The LEA's average school-level percentage of federal funds comprising the total per-pupil expenditure amount:** An LEA with a higher dependency of federal funds to provide services to its students is more at-risk if Federal funding is reduced or is administered ineffectively.

2021-2022 Universal Risk Assessment Rubric

#	Indicator	Low Risk Value	Medium Risk Value	High Risk Value	Low Risk Criteria	Medium Risk Criteria	High Risk Criteria	Data Source
1	% of Schools in the District with Comprehensive Support & Improvement (CS&I) Status (most recent available)	5	10	15	Less than 10%	10% - 19.99%	20% or more	2018-2019 Federal Index and ESSA Support Categories, by School
2	% of Schools in the District with Targeted Support & Improvement (TS&I) Status (most recent available)	3	6	10	Less than 50%	50% - 69.99%	70% or more	2018-2019 Federal Index and ESSA Support Categories, by School
3	Total Allocation of Federal Grants, FY 2021-22	5	10	15	Less than \$3 million	\$3-10 million	More than \$10 million	Sum of preliminary 2021-22 Federal grant allocations for 7 programs within the consolidated application
4	Total Number of Federal Grants, FY 2021-22	3	6	10	3 grants or less	4 to 5 grants	6 -7 grants	Number of Federal grants per district for 2021-22 within the consolidated application
5	% of Unexpended Federal Grant Funds (2019-2020)	5	10	15	10.00% or less	10.01% - 20.00%	20.01% or more	Sum of unexpended funds from 2019-2020 FLAGS detail reports for 7 grants within the consolidated application
6	Timeliness of Grant Applications, FY 2021-22	3	6	10	90% to 100% on time	80% to 89.99% on time	Less than 80% on time	Timeliness of grant applications for 2021-22 fiscal year as indicated on internal ShareFile Tracker as of 8/18/2021
7	The LEA's average school-level percentage of federal funds comprising the total per-pupil expenditure amount	3	6	10	Less than 7%	7.00% - 8.99%	9% or more	2018-19 School per-pupil expenditures report as of April 7, 2021