Risk Level Tool & Assessment

Financial Risk Designation
Programmatic Risk Designation
Appeal Process

The risk assessment tool assesses both financial and programmatic risk for subrecipients. The results from the risk assessment dictates appropriate financial and programmatic monitoring for each agency and/or funded project.

At the beginning of each grant cycle, financial staff will complete a financial risk assessment for each funded *organization* and grant coordinators will complete a programmatic risk assessment for each *program/project.* Victim Assistance uses a wide array of monitoring activities to ensure fiscal and programmatic integrity of grant funds.

Agencies will be notified of their risk designation. If an agency does not agree with the risk assessment designations, there is an appeal process. For more information, please refer to the appeal process section of this chapter.

Financial Risk Designations

An agency's financial risk designation will stay in place for the entire 3-year grant cycle and applies to all grants. Victim Assistance reserves the right to raise any risk designation should new information be discovered; however, the risk designation will not be lowered during the 3-year grant cycle.

The following are some of the factors considered when assessing financial risk:

1. Total award amount
2. Percentage of Victim Assistance funding for organization budget
3. Percentage of award reversions
4. Timely submission of invoices
5. Previous grant award experience
6. Claim errors/issues
7. Requests for advancements or expedited claims
8. Financial competency
9. Audit findings
10. Fiscal staff turnover
11. Prior debarment or high risk status

Each question in the risk assessment tool is worth a certain number of points. Based on the total points scored, the agency is designated as either high risk, medium risk or low risk. The higher the score, the

higher the assumed financial risk.

Risk Designation and Resulting Monitoring

High risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
    a. Payroll
    b. Benefits
    c. Client assistance expenses
    d. Sensitive Minor Equipment with an individual cost greater than $500 (equipment includes computers, laptops, tablets, cell phones, copiers, etc.).
    e. Match

2. Financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will have at least one financial desk review each fiscal year to review at least two full claims of all reimbursements and/or an in-depth review of up to 50 individual line item expenses, with all supporting documentation for each method. **Exception:** Victim Assistance does not need to review any documentation they already reviewed in #1 above.

Medium risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
    a. Payroll
    b. Client assistance expenses
    c. Match

2. Financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will receive a minimum of one financial desk review each fiscal to review at least one full claim reimbursement and/or an in-depth review of at least 25 individual line item expenses with supporting documentation for each method. **Exception:** Victim Assistance does not need to review any documentation they already reviewed in #1 above.

Low risk designation and resulting monitoring:

1. Organization is required to provide 100% supporting documentation for the following expenses with every monthly/quarterly claim reimbursement:
    a. Client assistance expenses

2. Financial staff will use their professional judgment and experience working with an organization to determine the frequency and intensity of additional monitoring. In general, however, organizations will receive a minimum of one financial desk review each fiscal year to review at least one full claim reimbursement or an in-depth review of at least 25 individual line item expenses with supporting documentation for each method **. Exception:** Victim Assistance financial can exclude client assistance since client assistance has already been reviewed.

When reviewing claims, staff will use their professional judgment to determine if additional documentation is needed for a particular claim, for example, large expenditures, equipment, out of the norm travel costs, or unusual match.

Note for supporting documentation:
Upload budget allocation by fund source and expense type if the supporting documentation cannot be tracked in the original budget. Payroll summary is mandatory if payroll documentation is required by the associated risk assessment designation.

Programmatic Risk Designations

An agency's programmatic risk designation will stay in place for the entire 3-year grant cycle. Victim Assistance reserves the right to raise any risk designation should new information be discovered; however, the risk designation will not be lowered.

Programmatic risk assessment scores determine if programs within agencies are considered high, medium or low programmatic risk. Grant funded projects are evaluated based on a programmatic risk assessment. Based on the total points scored each agency is designated as high risk, medium risk or low risk. Some of the risk factors considered when assessing risk are:

1. Administrative capacity
2. Programmatic goals
3. Reduction in clients served
4. Quality of service
5. Other programmatic concerns

Risk Designation and Resulting Monitoring

Program high risk designation:

1. Conduct on-site annual technical assistance meeting with the program.
2. Develop a service plan that addresses deficiencies pertaining to the award/contract that is identified through the risk assessment tool and technical assistance visit.

Program medium risk designation:

1. Conduct technical assistance meeting with the program within the first two years of the contract. Grant coordinators will use professional judgment and experience working with the subrecipient to determine if the technical assistance be provided on-site or virtually (email, telephone, skype, etc.)
2. A service plan will be developed, if warranted, from the results of technical assistance and risk assessment.

Program low risk designation:

1. Grant Coordinators will use discretion if technical assistance or on-site visit is warranted.

Appeal Process

Subrecipients have the right to appeal their risk assessment decision. To file an appeal, the organization's authorized official must send an email to the VSS Administrator stating he/she wishes to appeal the risk assessment decision and detail the reasons for the appeal as well as provide additional documentation to substantiate his or her reasons to appeal. Subrecipients must appeal within 7 days of receipt of notice of risk assessment designation. The appeal will be accepted, rejected or negotiated within 7 working days.

If the appeal is accepted, grant coordinators will complete a new risk assessment and offer a revised risk assessment designation and subsequent monitoring plan. If the appeal is rejected, staff will notify the organization and will work with the organization to address its concerns as outlined in the appeal. If the appeal is negotiated, staff and the organization will work together to potentially change some issues outlined

in the appeal, while holding firm, other issues and concerns from the subrecipient. If appropriate, the risk assessment designation will change.

Each risk assessment decision and each appeal are to be considered on a case-by-case basis, while maintaining integrity and fairness throughout the process. The determination of the appeal is the final step in the appeals process.

back to top

© 2026 State of Iowa Office of the Attorney General