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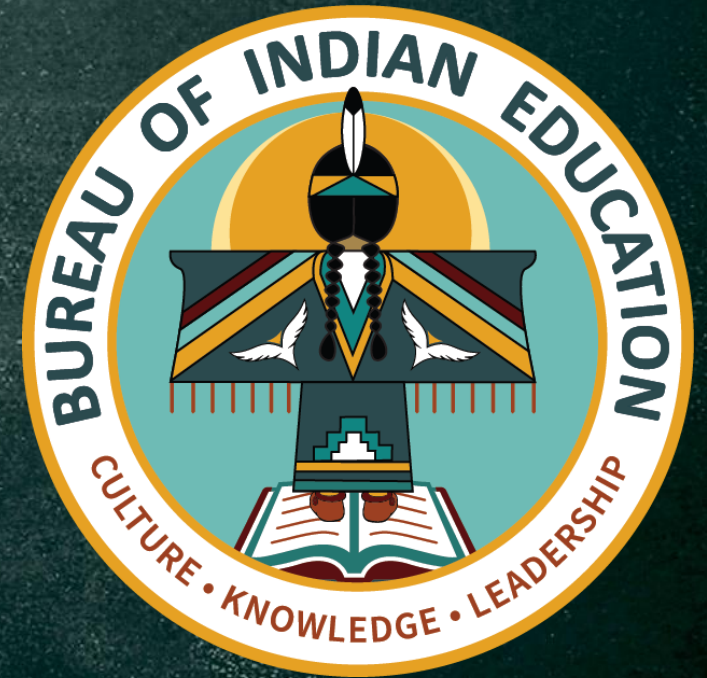
CULTURE • KNOWLEDGE • LEADERSHIP



U.S. Department of the Interior
Bureau of Indian Education

RISK ASSESSMENT TRIBAL CONSULTATION

Tribally Controlled School Team
School Operations Team





Mission Statement

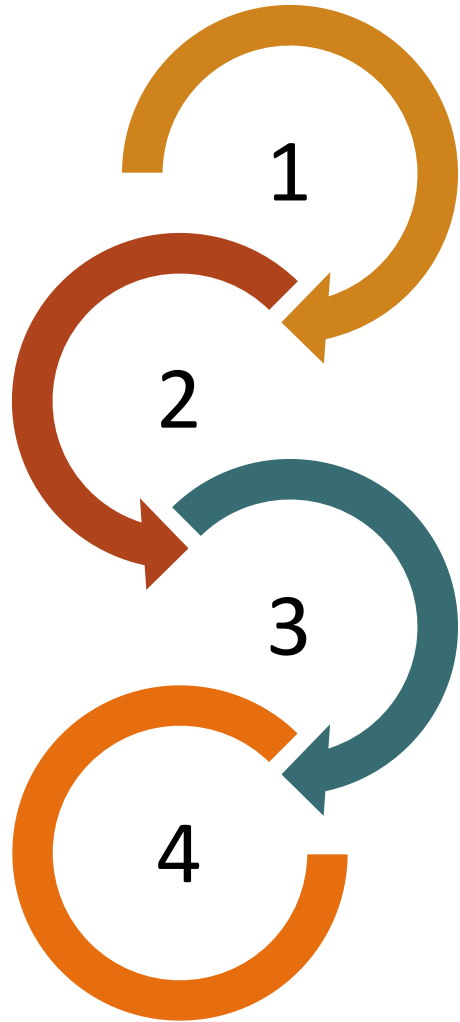
In partnership with Indigenous Nations, the BIE promotes a culturally-based, holistic education that prepares and empowers students to be healthy and successful.



PURPOSE of CONSULTATION

- The Hopi Board of Education has submitted a grant application under the Tribally Controlled Schools Act.
- Under 2 CFR 200.206(b), the BIE must evaluate the risk posed by an applicant before issuing a federal award. This evaluation considers a recipient's risk of non-compliance with Federal statutes, regulations and award conditions.
- While the Department of the Interior has the Acquisition, Assistance, and Asset Policy (DOI-AAAP) Financial Assistance Risk Assessment Checklist and the Financial Capability Questionnaire, these documents have not undergone tribal consultation by BIE tribal leaders or Indian education stakeholders.

Today's Overview



- 1: Provide an Overview of the Financial Assistance Risk Assessment Checklist and the Financial Capability Questionnaire.
2. Potential impacts on HBE's award.
3. Recommendations for improving the Financial Assistance Risk Assessment Checklist and the Financial Capability Questionnaire
4. Procedure for ongoing communication and feedback



Financial Assistance Risk Assessment Checklist

1. Single Audit Compliance.

- If a Single Audit **is available**, complete steps 1 and skip steps 2 and 3.
- If a Single Audit **is not available**, skip step 1 and proceed to step 2.

LOW	<ul style="list-style-type: none">• 1 point• The recipient's Single Audit did not contain any of the following: Qualified Opinion, a "going concern" emphasis-of matter paragraph, significant deficiency, material weakness, material noncompliance, or any Standard Form Single Audit Compliance (SF-SAC) types of compliance findings.
MEDIUM	<ul style="list-style-type: none">• 3 points• The recipient's Single Audit contained any of the following: Qualified Opinion, a "going concern" emphasis-of matter paragraph, significant deficiency, material weakness, material noncompliance, or any SF-SAC types of compliance findings that are not directly related to the Bureau's or Office's financial assistance programs.
HIGH	<ul style="list-style-type: none">• 5 points• The recipient's Single Audit contained any of the following: adverse opinion, disclaimer of opinion, a "going concern" emphasis-of-matter paragraph, any SF-SAC types of compliance findings that are directly related to the Bureau's or Office's financial assistance programs.

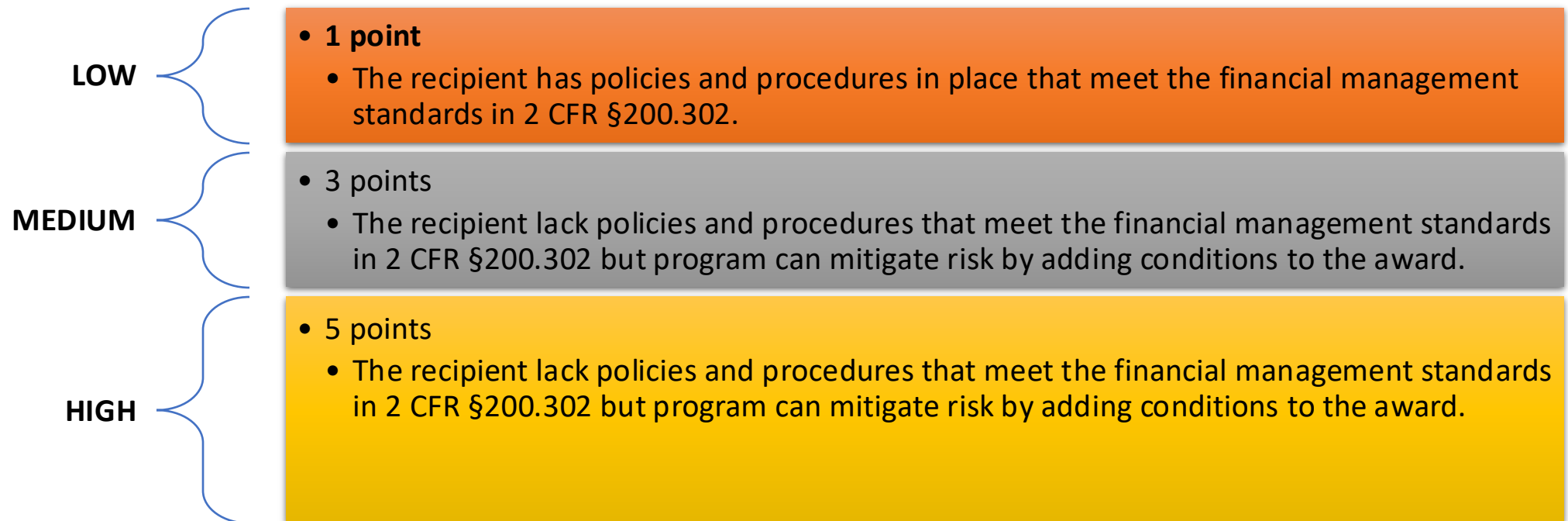
2. Independent Audit.

- If an independent audit is available, complete step 2 and skip step 3. If no, skip step 2 and proceed to step 3.

LOW	<ul style="list-style-type: none">• 1 point• The recipient received an unqualified opinion on their independent audit.
MEDIUM	<ul style="list-style-type: none">• 3 points• The recipient received a qualified, adverse, or disclaimer of opinion on their independent audit but program can mitigate risk by adding conditions to the award.
HIGH	<ul style="list-style-type: none">• 5 points• The recipient received a qualified, adverse, or disclaimer of opinion on their independent audit and program cannot mitigate risk by adding conditions to the award.

3. Other Tool.

- Has completed a Financial Capability Questionnaire.



4. Federal Award Performance and Integrity Information System (FAPIIS)

LOW	<ul style="list-style-type: none">• 1 point• The recipient has no FAPIIS record.
MEDIUM	<ul style="list-style-type: none">• 3 points• The recipient has negative performance information in FAPIIS, but the program has positive prior experience with the recipient.
HIGH	<ul style="list-style-type: none">• 5 points• The recipient has negative performance information in FAPIIS but bureau/office can mitigate risk by adding conditions to the award.

5. Performance Track Record.

LOW	<ul style="list-style-type: none">• 1 point• Has met all objectives in previous award(s); on schedule to meet all objectives in current award(s) or met most objectives in previous award(s) and the reason(s) for delay or non-performance was(were) unavoidable or recipient has no past or current award with the bureau.
MEDIUM	<ul style="list-style-type: none">• 3 points• Has no previous awards or may have had issues with meeting objectives in current or past award(s) but was responsive to bureau communications or request for information or action related to the issue(s). Issue(s) was(were) resolved.
HIGH	<ul style="list-style-type: none">• 5 points• Has failed to deliver proposed outcomes/outputs on previous award(s); significantly behind schedule or failing to meet maintenance of effort required on current award(s) due to failures within control to correct. Significantly failed to comply with award terms and conditions and was not responsive to communications or requests for information or action related to the issues. Issues were never resolved.



DOI Financial Assistance - FINANCIAL CAPABILITY QUESTIONNAIRE

- Use this form if a recipient is not subject to the Single Audit and has not undergone an independent audit.

[Financial Capability Questionnaire TEMPLATE - click here](#)

SECTION 1 – APPLICANT ORGANIZATIONAL INFORMATION							
1. Name of Organization and Address:							
2. Authorized Representative's Name and Title:							
3. Phone: (and extension)			4. Fax:				
5. Email:			6. Year Established:				
7. Employer Identification Number (EIN):			8. DUNS Number:				
9. Type of Organization:							
10. Approximate Number of Employees:		Full Time (Volunteer):		Part Time (Paid):		Part Time (Volunteer):	
Full Time (Paid):							



SECTION 2 – ACCOUNTING SYSTEM

	Yes	No	
11. Has any Government Agency rendered an official written opinion concerning the adequacy of the accounting system for the collection, identification and allocation of costs under Federal contracts/grants?	<input type="checkbox"/>	<input type="checkbox"/>	
12. If yes, provide name and address of Agency performing review: (Attach a copy of the latest review and any subsequent correspondence, clearance documents, etc.)			
	Manual	Automated	Combination
13. Which of the following best describes your accounting system:	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Yes	No	Not Sure
14. Does the accounting system identify the receipt and expenditure of program funds separately for each grant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Does the accounting system provide for the recording of expenditures for each grant/contract by budget cost categories shown in the approved budget?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16. Does the accounting system provide for the recording of cost sharing or match for each grant? Can you ensure that documentation is available to support recorded match or cost share?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
17. Are time distribution records maintained for each employee that specifically identify effort charged to a particular grant or cost objective?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
18. Does the accounting/financial system include budgetary controls to preclude incurring obligations or costs in excess of total funds available for a grant?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
19. Does the accounting/financial system include budgetary controls to preclude incurring obligations or costs in excess of total funds available for a budget cost category (e.g. Personnel, Travel, etc.)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20. Is your organization generally familiar with the existing regulation and guidelines containing the Cost Principles and procedures for the determination and allowance of costs in connection with Federal grants?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
21. Is a separate bank account maintained for Federal grant funds?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
22. If a separate bank account is not maintained, can the Federal grant funds and related expenses be readily identified?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



SECTION 3 – PROPERTY STANDARDS, PROCUREMENT STANDARDS, AND TRAVEL POLICIES

PROPERTY STANDARDS

	Yes	No	Not Sure
23. Does your property management system(s) provide for maintaining: (1) a description of the equipment; (2) an identification number; (3) source of the property, including the award number; (4) where title vests; (5) acquisition date; (6) federal share of property cost; (7) location and condition of the property; (8) acquisition cost; & (9) ultimate disposition information?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
24. Does your property management system(s) provide for a physical inventory and reconciliation of property at least every two years?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
25. Does your property management system(s) provide controls to insure safeguards against loss, damage or theft of the property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

PROCUREMENT STANDARDS

	Yes	No	Not Sure
26. Does your organization maintain written procurement procedures which (1) avoid unnecessary purchases; (2) provide an analysis of lease and purchase alternatives; and (3) provide a process for soliciting goods and services?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
27. Does your procurement system provide for the conduct to ensure selection on a competitive basis and documentation of cost or price analysis for each procurement action?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
28. Does your procurement system include provisions for checking the "Excluded Parties List" system for suspended or debarred sub-grantees and contractors, prior to award? www.sam.gov	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

DOI Financial Assistance - FINANCIAL CAPABILITY QUESTIONNAIRE

TRAVEL POLICY	Yes	No	Not Sure
29. Does your organization maintain a standard travel policy or, if nopolicy exists, does your organization adhere to rates and amounts established under 5 U.S.C. 5701–11, (“Travel and Subsistence Expenses; Mileage Allowances”), and policies under the Federal Acquisition Regulations at 48 CFR 31.205–46(a)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
SUBRECIPIENT MANAGEMENT	Yes	No	Not Sure
30. (For Pass-through entities only). Does your organization have controls in place to monitor activities of subrecipients, as necessary, to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of the award and that performance goals are achieved.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
INDIRECT COSTS	Yes	No	Not Sure
31A. We are a U.S. state or local government entity receiving more than \$35 million in direct Federal funding each year with an approved indirect cost rate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31B. We are a U.S. state or local government entity receiving less than \$35 million in direct Federal funding each year with an established indirect cost rate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31C. We are a non-governmental entity that has previously negotiated an indirect cost rate or has a current approved indirect cost rate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31D. We are an entity that has never submitted an indirect cost rate proposal to our cognizant agency. In the event an award is made, we will submit a rate proposal to our cognizant agency.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31E. We are an entity that has never submitted an indirect cost rate proposal to our cognizant agency. In the event an award is made, we agree as a condition of award to charge the 10% de minimis indirect cost rate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
31D. We are an entity that charges all costs directly.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
32. If my organization chooses to charge indirect costs to the Federal award or use indirect costs as a match, you understand that you must prepare an indirect cost rate proposal and submit it to your cognizant Federal agency for approval. Alternatively, you may use a de minimus rate of 10% of modified total direct costs (MTDC).			

STANDARDS FOR FINANCIAL MANAGEMENT SYSTEMS and APPLICANT CERTIFICATION

I certify that the above information is complete and correct to the best of my knowledge. The signature provided below serves as the digital signature for this document. By replacing "[Block 1]" with a name and "[Block 2]" with a date, the signer approves the information provided in this document. (Use the following method to check signature authentication via revision history: on keyboard, press and hold Ctrl+Alt+Shift+H)

Name:	
Title:	
Signature	[Block 1]
Date	[Block 2]



Calculation

**Department of the Interior
Office of Acquisition and Property Management
Financial Assistance Risk Assessment Checklist**

Calculate the preliminary risk rating by adding the risk scores and dividing by 4.

LOW: Average = 1 through 2.4

MEDIUM: Average = 2.5 through 3.4

HIGH: Average = 3.5 through 5

Are there any other factors that impact, either by raising or lowering, the recipient's preliminary risk level? If yes, describe each factor and explain how each raised or lowered the preliminary risk level in the text box below:

Enter final risk rating here. Consider the preliminary risk rating and any factors that impact the preliminary risk level.



Applying the Risk Assessment

If the application is approved based on the statutory criteria, then a risk assessment will be conducted. The risk assessment determines the need for specific conditions and if they will be applied to the grant.



2 CFR 200.208 Specific conditions

- (a) Federal agencies are responsible for ensuring that specific Federal award conditions and performance expectations are consistent with the program design (See [§ 200.202](#) and [§ 200.301](#)).
- (b) The Federal agency or pass-through entity may adjust specific conditions in the Federal award based on an analysis of the following factors:
 - (1) Review of OMB-designated repositories of government-wide data (for example, *SAM.gov*) or review of its risk assessment (See [§ 200.206](#));
 - (2) The recipient's or subrecipient's history of compliance with the terms and conditions of Federal awards;
 - (3) The recipient's or subrecipient's ability to meet expected performance goals as described in [§ 200.211](#);
or
 - (4) A determination of whether a recipient or subrecipient has inadequate financial capability to perform the Federal award.



Examples of Specific Conditions (2 CFR 208 (c))

Specific conditions may include:

- Requiring payments as reimbursements rather than advance payments;
- Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given period of performance;
- Requiring additional, more detailed financial reports;
- Requiring additional project monitoring;
- Requiring the grantee to obtain technical or management assistance; and
- Establishing additional prior approvals.



Risk Assessment Guiding Questions

1. Which sections of the risk assessment are unclear or confusing?
2. Are there any important risk areas currently missing from the form?
3. Are the risk categories (low/medium/high) meaningful and consistent?



YOUR INPUT MATTERS

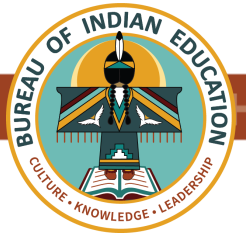
Comments Due:
June 26, 2026, at
noon PT.



Email to:
Kimberly.smith@bie.edu



Mail to Tribally
Controlled
Schools, Seattle
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Resource Center
(ERC) 909 1st
Avenue Suite 192
Seattle,
WA 98104



Mvto HiyHiy LemLmts Wado
Wawaenon DaWaEh Miigwech Wopila
Quyana Pinagigi Wimblahaho
Baasee AnaaBasee Pilamiya Taikuu
Ahéhee Hiriwetudahe Nya:Weh Aho
ThankYou Tansi