



Gaston County

Gaston County
Board of Commissioners
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Financial and Management Services - Finance Board Action

File #: 24-395

Commissioner Worley - Finance - To Amend Grant Policy for the Gaston County Coronavirus State and Local Fiscal Recovery Funds - Risk Assessment Template

STAFF CONTACT

Mrs. Brandy Decker - Finance - 704-866-3338

BUDGET IMPACT

N/A

BUDGET ORDINANCE IMPACT

N/A

BACKGROUND

The American Rescue Plan (ARP) Act of 2021 created new Coronavirus State and Local Fiscal Recovery Funds. The Act sets aside \$65.1 billion to be allocated to counties based on population and sent directly from the Department of Treasury. Gaston County has received \$43,612,126 million over two years. Pursuant to Section 13.2 of Chapter 159 of the General Statutes of North Carolina, the Gaston County Grant Project Ordinance 2021-264 for the Gaston County Coronavirus State and Local Fiscal Recovery Funds was adopted in Regular Session by the Gaston County Board of Commissioners on September 28, 2021. This Board Action, if approved, will amend the current ARPA grant policy with a modified risk assessment template to incorporate with Gaston County grant policy of Coronavirus State and Local Fiscal Recovery Funds

POLICY IMPACT

See attached

ATTACHMENTS

Risk Assessment Matrix

DO NOT TYPE BELOW THIS LINE

I, Donna S. Buff, Clerk to the County Commission, do hereby certify that the above is a true and correct copy of action taken by the Board of Commissioners as follows:

| NO. | DATE | M1 | M2 | CBrown | CCloninger | AFraley | BHovis | KJohnson | TKelghier | RWorley | Vote |
|----------|------------|----|----|--------|------------|---------|--------|----------|-----------|---------|------|
| 2024-299 | 08/27/2024 | BH | AF | A | A | A | A | A | A | A | U |

DISTRIBUTION:

Laserfiche Users

A=AYE, N=NAY, AB=ABSENT, ABS=ABSTAIN, U=UNANIMOUS

American Rescue Plan Act (ARPA)

Risk Assessment

Project Name

Updated

Date Last Used

Overall Risk:

| | | | Inherent Risk | | | | | Residual Risk | | |
|----------------------|--|----------|----------------------|-----------------|--|--|---|----------------------|-----------------|--------------------------------|
| | Description | Comments | Inherent Probability | Inherent Impact | Inherent Risk rating (Without Control) | Control | Control Owner(s) Name | Residual Probability | Residual Impact | Residual Rating (With Control) |
| General Assessment | Properly licensed or certified by a recognized source (IRS nonprofit determination letter, bonded and insured if construction related, valid Unique Entity Identification - UEI) | | | | | Verify IRS determination, 501c, verify Unique Entity Identification (UEI) | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Has there been any change in the entity's key staffing positions in the last 2 years? Adequate facility, equipment, supplies, and staffing for the staffing for the needs of the award | | | | | Identify list of staff and qualifications that will be involved with award term | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Anticipation of concern with proposed award | | | | | Additional training and guidance with compliance, reporting referencing other applicable resources (SOG, NCACC) nonprofit should verify additional classes have been | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Adopted and Implemented records retention, conflict of interest, and nondiscrimination policies, and code of ethics policy consistent with ARPA | | | | | Review and verify policies | ARPA Grant Manager/Originating Department Program Manager | | | |
| Experience | Past performance meeting federal program outcomes and managing federal funds in compliance with federal regulations | | | | | Provide the last three (3) award periods from other funders | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Experience in managing federal funds of the scope of this proposed subaward | | | | | Provide past performance on meeting federal program outcomes and managing federal funds | ARPA Grant Manager/Originating Department Program Manager | | | |
| Financial Management | Financial management system that provides records that can identify the sources and application of funds for subaward activities | | | | | Verify financial system that identify activities of subaward activities | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Written personnel policy addressing pay/rates benefits, time/attendance leave, discrimination, conflict of interest | | | | | Review/verify policy | ARPA Grant Manager/Originating Department Program Manager | | | |
| | Record maintenance and retention policy | | | | | Verify record retention policy | ARPA Grant Manager/Originating Department Program | | | |
| | Entity have sufficient cash flow to carry out the subaward terms | | | | | A decision will be made if advancement is necessary | Upper Management | | | |
| Audit | Completed a Single Audit in the past five years | | | | | Provide most recent audit report, a copy of the most current financial statements for current year | ARPA Grant Manager/Originating Department Program Manager | | | |

| Without Control | | | | |
|-----------------|--------|-------------|-------------|-------------|
| Impact | | Low | Medium | High |
| Probability | High | Sustainable | Moderate | Severe |
| | Medium | Sustainable | Sustainable | Moderate |
| | Low | Sustainable | Sustainable | Sustainable |
| | | | | |

| Inherent Count | | | | |
|----------------|--------|-----|--------|------|
| Impact | | Low | Medium | High |
| Probability | High | | | |
| | Medium | | | |
| | Low | | | |
| | | | | |

Probability Impact

| | | |
|--------|--------|-------------|
| Low | Low | Sustainable |
| Medium | Medium | Moderate |
| High | High | Severe |

| With Control | | | | |
|--------------|--------|-------------|-------------|-------------|
| Impact | | Low | Medium | High |
| Probability | High | Sustainable | Moderate | Severe |
| | Medium | Sustainable | Sustainable | Moderate |
| | Low | Sustainable | Sustainable | Sustainable |
| | | | | |

| Residual Count | | | | |
|----------------|--------|-----|--------|------|
| Impact | | Low | Medium | High |
| Probability | High | | | |
| | Medium | | | |
| | Low | | | |
| | | | | |

Instructions:

To complete the Inherent Risk, ask the question: "What is the probability of potential subrecipient not (description)...? Assess the risk by the indicated level with the dropdown list. Ask the question, What would be the impact? Choose the risk level from the dropdown list.

To complete the Residual Risk, after obtaining/reviewing the control items, as the question "What is the probability (description)...? What would be the impact? Choose the risk level from the dropdown list.

Assess the risk after the control items have been obtained. The risk should be lower than the inherent. If not, the results will be the same. The total number of risks from your Residual Count should be your "Overall Risk". Use the dropdown on the "ARPA risk" template in the upper right to indicate "Overall" level of risk.