## Office of Inspector General American Recovery and Reinvestment Act of 2009 Risk Readiness Review

**Review Performed By: Date(s) of Review:** 

## Agency: Program Area Receiving ARRA Funds:

## **Subject:** Risk Readiness Review

**Objective:** The objective of this review is to assess the status of the implementation of internal controls, which should help mitigate the risk of fraud, waste, or abuse, in programs receiving funds under the American Recovery and Reinvestment Act of 2009. This review program includes sections for the agency's Procurement/Acquisition, Budget, Legal, and Finance & Accounting functions as well as a section specifically for the program receiving ARRA funds. This review program is appropriate to use if the agency only has one program receiving ARRA funds or if the Procurement/Acquisition, Budget, Legal, and Finance & Accounting functions are not centralized. (If the agency has more than one program receiving ARRA funds or decentralized administrative support functions, the General Risk Readiness and Program Risk Readiness Review programs should be utilized.) This review should provide important feedback to operating/program managers; however, operating/program managers are ultimately responsible for ensuring that adequate internal controls are in place to deter fraud, waste, or abuse.

**Instructions**: The auditor should indicate the completion of each step of the review by entering "Yes," "No," or "N/A" and inputting their initials and the date where indicated. Comments and recommendations should be completed if the auditor feels this is needed to provide an explanation to a question or it is relevant to the review. As this is a limited review, a "Yes" only indicates that the auditor has examined some evidence of controls that should help mitigate risk. If the auditor determines that the risk related to a review step has not been appropriately mitigated or that no evidence of the internal control is available (because the program is in an early implementation stage or for any other reason), he or she should check the box for that step in the column "Follow-up Required" to indicate that follow-up is needed and should indicate a target date to perform the follow-up. The auditor completing this review should use their judgment to determine whether more detailed review of an area is necessary.

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
A. Procurement/Acquisition Contact Person:					
<ol> <li>Is the procurement/acquisition area using existing procedures for funds received under</li> </ol>					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
the Recovery Act?				_	
a. If existing procedures, were they updated to include all requirements of the Recovery Act?					
2) Is the procurement/acquisition area using new procedures for funds received under the Recovery Act?					
a. If new procedures, do they adequately address all requirements of the Recovery Act?					
3) Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse associated with the Recovery Act funds?					
4) Have qualified personnel been assigned to oversee the area of procurement/acquisition involving Recovery Act funds?					
5) Are there sufficient levels of qualified personnel in the procurement/acquisition area to manage the Recovery Act programs (for instance, Grants, Contracting, etc.)?					
6) Are staff adequately trained to effectively implement Recovery Act requirements?					
7) Are new Requests for Proposal issued under Recovery Act initiatives created with the necessary language to satisfy the requirements of the Recovery Act?					
8) Are Recovery Act contracts awarded in a prompt, fair, and reasonable manner?					
<ul> <li>9) Do new contracts awarded using Recovery Act funds have the specific terms and clauses required?</li> </ul>					
10) Are contracts awarded using Recovery Act funds transparent to the public?					
11) Are the public benefits of the funds used					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
under these contracts reported clearly,					
accurately and in a timely manner?					
12) Are Recovery Act funds used for authorized					
purposes and the potential for fraud, waste, error, and abuse mitigated?					
13) Are there any performance issues identified					
with regards to a (potential) contractor?					
a. If yes, are there follow-up actions required to					
address the insufficient performance?					
14) Are procurement/acquisition staff assigned to					
oversee Recovery Act funds trained in the					
performance management requirements?					
15) Are procurement/acquisition operational					
systems configured to manage and control					
Recovery Act funds?					
16) Can the operational systems support any					
increases in volume of Recovery Act					
contracts, grants, etc.?					
17) Is the reporting required by the Recovery Act in place?					
18) Are the appropriate data elements identified					
that must be captured, classified and					
aggregated for analysis and reporting to meet					
Recovery Act requirements?					
19) Has the agency implemented communication					
vehicles to ensure Recovery Act data is					
promptly reported?					
20) Are reports issued accurate and have the data					
elements required under Recovery Act?					
B. Budget					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
Contact Person:					
<ol> <li>Is the budget area using existing procedures for funds received under the Recovery Act?</li> <li>a. If existing procedures, were they updated to include all requirements of the Recovery Act?</li> </ol>					
<ul><li>2) Is the budget area using new procedures for funds received under the Recovery Act?</li></ul>					
a. If new procedures, do they adequately address all requirements of the Recovery Act?					
3) Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse associated with the Recovery Act funds?					
<ul><li>4) Have qualified personnel been assigned to oversee the area of budget involving Recovery Act funds?</li></ul>					
5) Are there sufficient levels of qualified personnel in the Budget area to manage the Recovery Act programs?					
6) Are staff adequately trained to effectively implement Recovery Act requirements?					
7) Are Recovery Act funds used for authorized purposes and the potential for fraud, waste, error, and abuse mitigated?					
8) Do projects funded under Recovery Act avoid unnecessary delays and cost overruns?					
<ul> <li>9) Are financial and operational systems used by Budget configured to manage and control Recovery Act funds?</li> </ul>					
10) Can financial and operational systems support any increase in volume of Recovery Act contracts, grants and loans etc.?					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
11) Has the agency established separate code(s) within FLAIR to ensure Recovery Act funds are clearly distinguishable?					
12) Are there controls in place to ensure that Recovery Act funds are not commingled with other agency funds?					
13) Is the reporting required by the Recovery Act in place?					
14) Are the appropriate data elements identified that must be captured, classified and aggregated for analysis and reporting to meet Recovery Act requirements?					
15) Has the agency implemented communication vehicles to ensure Recovery Act data is promptly reported?					
16) Are reports issued accurate and have the data elements required under Recovery Act?					
17) Are issues identified through established reports addressed on a timely basis?					
C. Legal Contact Person:					
<ol> <li>Is legal using existing procedures for reviewing materials regarding funds received under the Recovery Act?</li> </ol>					
a. If existing procedures, were they updated to include all requirements of the Recovery Act?					
2) Is legal using new procedures for reviewing materials regarding funds received under the Recovery Act?					
a. If new procedures, do they adequately					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
address all requirements of the Recovery Act?					
<ul><li>3) Have qualified personnel been assigned to review documents involving Recovery Act funds?</li></ul>					
<ul><li>4) Are there sufficient levels of qualified personnel in legal to manage the review of Recovery Act programs?</li></ul>					
5) Are staff adequately trained to effectively implement Recovery Act requirements?					
<ul> <li>6) Does legal review new Requests for Proposal issued under the Recovery Act initiatives to ensure that necessary language is contained to satisfy the requirements of the Recovery Act?</li> </ul>					
<ul> <li>7) Do new contracts awarded using Recovery Act funds have the specific terms and clauses required?</li> </ul>					
8) Are contracts awarded using Recovery Act funds transparent to the public?					
<ul><li>9) Are the public benefits of the funds used under these contracts reported clearly, accurately and in a timely manner?</li></ul>					
10) Are Recovery Act funds used for authorized purposes and the potential for fraud, waste, error, and abuse mitigated?					
11) Are there any performance issues identified with regards to a (potential) contractor?					
a. If yes, are there follow-up actions required to address the insufficient performance?					
12) Are legal staff assigned to review Recovery Act documents trained in the performance management requirements?					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
13) Is the reporting required by the Recovery Act in place?					
14) Are reports published under the Recovery Act reviewed and approved?					
<b>D. Finance &amp; Accounting</b> Contact Person:					
<ol> <li>Is the finance &amp; accounting area using existing procedures for funds received under the Recovery Act?</li> </ol>					
a. If existing procedures, were they updated to include all requirements of the Recovery Act?					
2) Is the finance & accounting area using new procedures for funds received under the Recovery Act?					
a. If new procedures, do they adequately address all requirements of the Recovery Act?					
3) Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse associated with the Recovery Act funds?					
4) Have qualified personnel been assigned to oversee the area of finance & accounting involving Recovery Act funds?					
5) Are there sufficient levels of qualified personnel in the finance & accounting area to manage the Recovery Act programs (for instance, financial management, reimbursement of invoices)?					
<ul><li>6) Are staff adequately trained to effectively implement Recovery Act requirements?</li></ul>					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
7) Are Recovery Act funds used for authorized purposes and the potential for fraud, waste,					
error, and abuse mitigated?					
8) Do projects funded under Recovery Act avoid unnecessary delays and cost overruns?					
9) Are there any performance issues identified with regards to a (potential) contractor?					
a. If yes, are there follow-up actions required to address the insufficient performance?					
10) Are finance & accounting staff assigned to					
oversee Recovery Act funds trained in the					
performance management requirements?					
11) Are financial and operational systems used by					
finance & accounting configured to manage					
and control recovery funds?					
12) Can financial and operational systems support					
any increase in volume of Recovery Act					
contracts, grants and loans etc.?					
13) Has the agency established separate code(s)					
within FLAIR to ensure Recovery Act funds					
are clearly distinguishable?					
14) Are there controls in place to ensure that					
Recovery Act funds are not commingled with					
other agency funds?15) Is the reporting required by the Recovery Act					
in place?					
16) Are the appropriate data elements identified					
that must be captured, classified and					
aggregated for analysis and reporting to meet					
Recovery Act requirements?					
17) Has the agency implemented communication					
vehicles to ensure Recovery Act data is					
promptly reported?					
18) Are reports issued accurate and have the data					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
elements required under Recovery Act?					
19) Are issues identified through established reports addressed on a timely basis?					
<b>E. Program Area</b> Contact Person:					
<ol> <li>Is the program area using existing procedures to guide the use of funds received under the Recovery Act?</li> </ol>					
a. If existing procedures, were they updated to include all requirements of the Recovery Act?					
2) Is the program area using new procedures to guide the use of funds received under the Recovery Act?					
a. If new procedures, do they adequately address all requirements of the Recovery Act?					
3) Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse associated with the Recovery Act funds?					
4) Have qualified personnel been assigned to oversee funds obtained through the Recovery Act?					
5) Are there sufficient levels of qualified personnel in the program area to manage the Recovery Act programs?					
<ul><li>6) Are staff adequately trained to effectively implement Recovery Act requirements?</li></ul>					
7) Are personnel empowered to make decisions and administer the Recovery Act programs?					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
8) Do new Requests for Proposal created under Recovery Act initiatives contain the necessary language to satisfy the requirements of the Recovery Act?					
9) Are Recovery Act contracts awarded in a prompt, fair, and reasonable manner?					
<ul> <li>10) Do new contracts awarded using Recovery Act funds have the specific terms and clauses required?</li> </ul>					
11) Are contracts awarded using Recovery Act funds transparent to the public?					
12) Are the public benefits of the funds used under these contracts reported clearly, accurately and in a timely manner?					
13) Are Recovery Act funds used for authorized purposes and the potential for fraud, waste, error, and abuse mitigated?					
14) Do projects funded under Recovery Act avoid unnecessary delays and cost overruns?					
15) Are there any performance issues identified with regards to a (potential) contractor?					
a. If yes, are there follow-up actions required to address the insufficient performance?					
16) Are program area staff assigned to oversee Recovery Act funds trained in the performance management requirements?					
<ul><li>17) Is there an agency-wide methodology for measuring performance of Recovery Act project?</li></ul>					
<ul><li>18) Are there any process metrics related to the Recovery Act funds that are primarily outcome-oriented?</li></ul>					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
19) Are there any open internal or external audit findings that would affect Recovery Act funds or programs?					
20) Does the agency have a corrective action plan process in place to promptly resolve any audit findings identified that may impact the ability to successfully implement Recovery Act requirements?					
21) Has the agency established a governance body or coordinator to oversee / manage the overall implementation of Recovery Act funds?					
22) Has the organization considered using alternative hiring methods allowed under the Recovery Act?					
23) Are financial and operational systems used by the program area configured to manage and control recovery funds?					
24) Can financial and operational systems support the increase in volume of Recovery Act contracts, grants and loans etc.?					
25) Is the reporting required by the Recovery Act in place?					
26) Are the appropriate data elements identified that must be captured, classified and aggregated for analysis and reporting to meet Recovery Act requirements?					
27) Has the agency implemented communication vehicles to ensure Recovery Act data is promptly reported?					
28) Are reports published under the Recovery Act reviewed and approved?					
29) Are reports issued accurate and have the data elements required under Recovery Act?					

	Yes, No, N/A	Auditor Initials/Date	Comments/Recommendations	Follow- up Required	Follow-up Date
30) Do the reports inform agency management					
what projects are occurring on a timely basis?					
31) Are issues identified through established					
reports addressed on a timely basis?					
32) Are reports issued on the effectiveness of risk					
management strategies and tactics timely?					
33) Are risk management issues monitored?					
34) Does the program area have risk triggers					
defined with applicable action plans?					