

New Mexico Environment Department





9:00 -	9:10
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Welcome

9:10 - 9:30

Upcoming Funding Opportunities for Section 319 and River Stewardship Program

9:30 - 10:00

Call for Data 2025

10:00 - 11:00

Reimbursement Request Updates for SWQB Agreements

11:00 - 12:00

Monitoring and Compliance Program for SWQB Cooperators

Ground Rules

- Meeting is recorded
- □ Slides, materials, and presentation will be posted on our website, here:

 https://www.env.nm.gov/surface-water-quality/nps-program-workshops/
- No planned breaks get up as you need to
- Questions in the chat will be answered after and between presentations
- Use the "Raise Hand" feature to ask a question and the presenter will call on you after the presentation

Funding Opportunities will be announced on our <u>listserv</u> and posted on our <u>website</u>

Clean Water Act Section 319

- On-the-ground (OTG)
 Request for Applications (RFA)
- Watershed-Based Plan (WBP)
 Request for Proposals (RFP)
- 60-day open period
- Both open approximatelyDecember 2024 to January2025

River Stewardship Program

- Request for Proposals (RFP)
- 60-day open period
- □ Spring 2025



Section 319 – New in 2024/2025

- Match requirement dropping to 10%!
- Funding available:
 - Section 319 On-The-Ground (OTG) projects: ~\$820,000
 - Section 319 Watershed-Based Planning (WBP) projects: ~\$240,000
 - River Stewardship Program projects: ~\$1.5M to \$11.5M
 - Depends on outcome of 2025 NM Legislative Session
- Funding is assigned by NMED as available.
- Funding has various expiration dates.

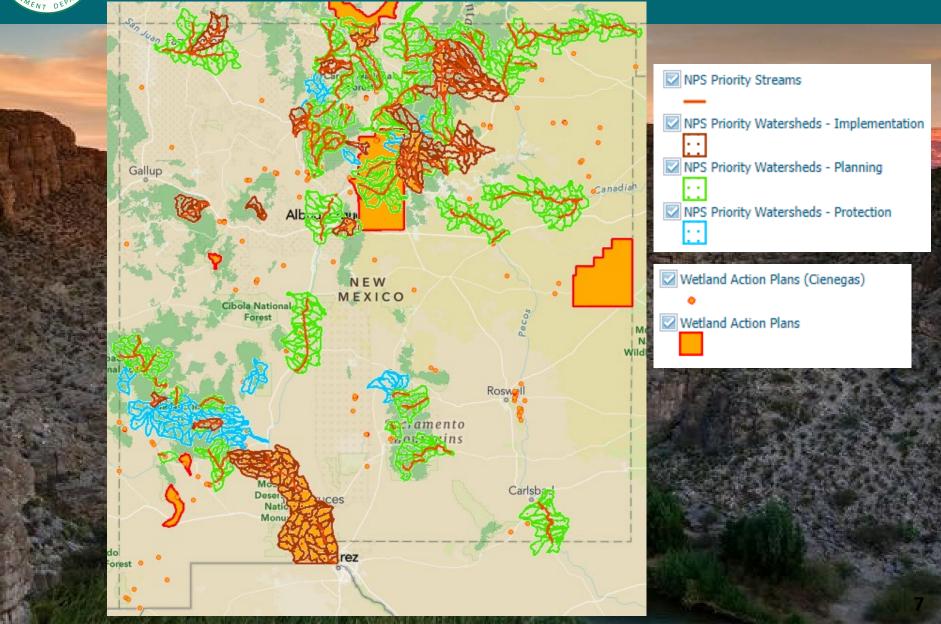
Three options to award OTG Projects*:

- 1. Riparian, Aquatic and Wetland Restoration Services Statewide Price Agreement (SWPA) #40-00000-23-00037
 - To be established soon see SPD SWPA website
- 2. Local Public Body
- 3. I'm not on the SWPA nor a Local Public Body now what?
 - Partner with someone who is a vendor on the SWPA (subcontracting is allowed), or
 - Use a Local Public Body as a fiscal agent or pass-through

^{*}Note - These do not apply to Section 319 WBP funding for 2024/2025



Section 319 Priorities



https://www.env.nm.gov/surface-water-quality/

Sign Up for Our Mailing List!



Surface Water Quality Bureau

The Surface Water Quality Bureau preserves, protects, and improves New Mexico's surface water quality for present and future generations.

This is accomplished through:

- Monitoring and assessing of surface water quality in relation to water quality standards
- Implementing ground and surface water protection regulations related to point source pollution (any single identifiable source of pollution from which pollutants are discharged, such as a pipe or ditch), permitting of these sources and spill reporting
- Protecting watersheds from other forms of pollution through overseeing and funding watershed improvement projects

Click here to subscribe to receive email updates!

Sign up on our website to join our mailing list to receive SWQB announcements!









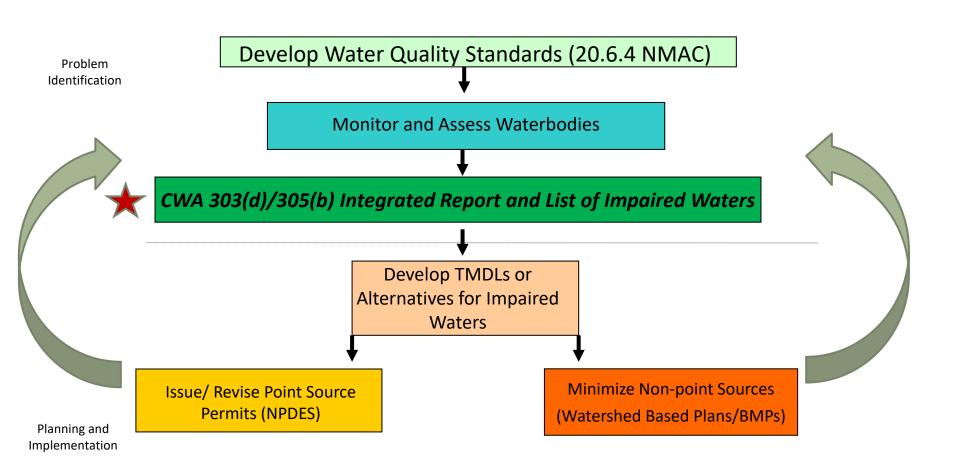
Clean Water Act §303(d)/§305(b) Integrated Report Schedule and Opportunities to Submit Data

Meredith Zeigler Assessment Coordinator October 22, 2024



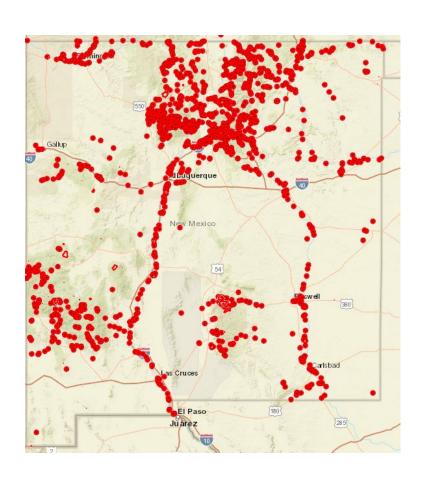


Clean Water Act (CWA) Framework





SWQB Rotational Water Quality Surveys



- The Jemez, Rio Puerco, Rio San Jose, Little Colorado and Lower Pecos watersheds (2021-2022 survey years) were the primary focus of the recently completed 2024-2026 Integrated Report (IR).
- Focus of upcoming 2026-2028 IR will be 2023-2024 water quality surveys (Rio Chama and Sacramentos watersheds).
- Water quality survey summaries and field sampling plans are available online at:

www.env.nm.gov/surface-water-quality/water-quality-monitoring/



Upcoming 2026-2028 IR Schedule

Rio Chama SWQB 2023-2024 water Sacramentos quality surveys... **Update Listing Methodology and** send out call for outside data (spring/summer 2025) Collation, QA/QC, verification, and assessment of water quality data (fall 2025) 2026-2028 Integrated List public comment period (late 2025) 2026-2028 Integrated List WQCC & EPA approval (March-April 2026) SWQB 2025-2026 water

quality surveys...

TBD



Assessment of Water Quality Data

COMPREHENSIVE ASSESSMENT AND LISTING METHODOLOGY (CALM):

PROCEDURES FOR ASSESSING WATER QUALITY STANDARDS ATTAINMENT FOR THE STATE OF NEW MEXICO CWA §303(d) /§305(b) INTEGRATED REPORT



NEW MEXICO ENVIRONMENT DEPARTMENT SURFACE WATER QUALITY BUREAU

AUGUST 22, 2023

- The Comprehensive Assessment and Listing Methodology (CALM) details the process used to determine if designated uses are being met.
- The CALM includes assessment methodologies for both narrative and numeric water quality criteria.
- The CALM is reviewed and revised as needed every odd-numbered year.
- All submitted data that meet SWQB QA/QC quality requirements are assessed.

Comprehensive Assessment and Listing Methodology

The Comprehensive Assessment and Listing Methodology (CALM) is how the Department evaluates existing and readily available surface water quality data and other information to determine whether or not surface water quality standards are being attained. Written listing methodologies are necessary to consistently determine whether or not surface waters are meeting their designated and existing uses. Protocols are updated as new and improved assessment tools and approaches become available.

- > 2021 CALM
- > Supporting Documents
- > Previous Versions

SWQB Listing Methodology Page 1 of 48

https://www.env.nm.gov/surface-water-quality/calm/



Assessment Conclusions

- When a water body <u>meets</u> water quality standards:
 - It is listed as Fully Supporting on 303(d)/305(b) List
 - It is delisted, if previously listed as impaired
- When a water body <u>does not meet</u> water quality standards:
 - The impairment is added or continued on the 303(d)/305(b) List, and SWQB:
 - Collects additional data as needed to confirm
 - Prioritizes TMDL (or TMDL Alternative) development
 - Reviews and revises water quality standards if warranted



CWA §303(d)/§305(b) Integrated Report

- Designed to satisfy the statutory requirements of §§ 303(d), 305(b), and 314 of the federal Water Pollution Control Act [33 U.S.C. 1251 et seq.], commonly known as the Clean Water Act (CWA)
- Submitted to EPA every even numbered year.
 For example, SWQB submitted the 2024-2026 Integrated
 Report to EPA in March 2024.
- Available online at:
 www.env.nm.gov/surface-water-quality/303d-305b/



Integrated Report (IR) Contents

The **Integrated Report (IR)** contains:

- An assessment of water quality (Appendix A);
- An analysis of the extent to which the CWA §101(a)(2) goal of surface water quality -- protection and propagation of fish, shellfish, and wildlife and recreation in and on the water -- is being achieved;
- An overview of progress in water pollution control; and
- A description of the nature of nonpoint source pollution and programs for nonpoint source pollution control.



Integrated List (IR Appendix A)

The Integrated List contains the Surface Water Quality Bureau's (SWQB) surface water quality assessment conclusions:

- Designated Use attainment status for each Assessment Unit (AU)
 - Based on most recent EPA approved version of NMED surface water standards at 20.6.4 NMAC.
 - Assessed using the procedures described in current SWQB CALM.
- AU and Parameter IR Categories 1-5 based on SWQB's CALM and EPA's Integrated Report Guidance
- New Mexico's List of Impaired Waters/ CWA §303(d) list:
 - Categories 4 and 5 are considered the List of Impaired Waters.
 - Category 5 waters are the focus of EPA Region 6's approval.



Integrated List IR Categories

Unimpaired or Restored (e.g., meets all monitored applicable WQ criteria):

IR Category 1

All designated uses are supported

IR Category 2

Available data and/or information indicate that some designated uses are supported, while others are "not assessed"

Unknown (e.g., no or not enough WQ data to determine if <u>any</u> uses are supported):

IR Category 3

There are insufficient available data and/or information to make any designed use support determinations

(3A)

No data available

3B

Less than four data points available with no exceedences of any applicable water quality criterion

3C

Less than four data points available with exceedences of an applicable water quality criterion



Integrated List IR Categories (cont.)

Impaired (does not meet one or more monitored water quality criteria):

IR Category 4

- 4A Impaired, but a TMDL has already been established for all pollutants
- Impaired, but other pollution control **requirements** are expected to result in attainment of the water quality standard
- 4C Impairment caused by a "pollution" vs. pollutant

IR Category 5 = CWA §303(d) List

- 5A Impaired and TMDL scheduled
- Impaired but review of the water quality standard is needed before scheduling TMDL
- Impaired but more data are needed before scheduling TMDL
- 5-ALT Impaired and an alternative restoration approach is in progress or under development



Integrated List - Example

East Fork Jem	ez (San Antonio C	Creek to VCNP bnd)	AU IR CATEGORY	LOCATION DES	SCRIPTION		
			5/5B	HUC: 13020202 Jemez			
AU ID	WQS REF	WATER TYPE	SIZE	ASSESSED	MONITORING SCHEDULE		
NM-2106.A_13	20.6.4.108	STREAM, PERENNIAL	11.76 MILES	2024	2031		
USE	ATTAINMENT	CAUSE(S)	FIRST LISTED	TMDL DATE	PARAMETER IR CATEGORY		
DWS	Fully Supporting						
FC	Not Assessed						
HQColdWAL	Not Supporting	Temperature Aluminum, Total Recoverable	2008 2016	9/15/2009	4A 5/5B		
IRR	Fully Supporting		-				
LW	Fully Supporting						
PC	Fully Supporting						
aluminum concer	Fully Supporting DNRW (Upper Rio Grantrations in the Jemez	: Mountains; aluminum criteria may	03). TMDLs for temp need review to identif	erature and arsenify appropriate/attai	inable levels.		
AU Comment: O aluminum concen	NRW (Upper Rio Gra ntrations in the Jemez	: Mountains; aluminum criteria may	AU IR CATEGORY	fy appropriate/attai	inable levels.		
AU Comment: O aluminum concen	NRW (Upper Rio Gra ntrations in the Jemez	: Mountains; aluminum criteria may	AU IR	fy appropriate/attai	inable levels. SCRIPTION		
AU Comment: O aluminum concen	NRW (Upper Rio Gra ntrations in the Jemez	: Mountains; aluminum criteria may	AU IR CATEGORY	LOCATION DES	inable levels. SCRIPTION		
AU Comment: O aluminum concer East Fork Jem AU ID NM-2106.A_10	NRW (Upper Rio Grantrations in the Jemez NRW (VCNP to head) WQS REF 20.6.4.108	: Mountains; aluminum criteria may	AU IR CATEGORY 5/5B SIZE 10.44 MILES	LOCATION DES HUC: 13020202 ASSESSED 2024	Jemez MONITORING SCHEDULE 2031		
AU Comment: O aluminum concer East Fork Jem AU ID NM-2106.A_10	NRW (Upper Rio Grantrations in the Jemez NRW (VCNP to head)	: Mountains; aluminum criteria may waters) WATER TYPE	AU IR CATEGORY 5/5B SIZE	LOCATION DES HUC: 13020202 ASSESSED	Jemez MONITORING SCHEDULE		
AU Comment: O aluminum concer East Fork Jem AU ID NM-2106.A 10 USE	NRW (Upper Rio Grantrations in the Jemez NRW (VCNP to head) WQS REF 20.6.4.108	waters) WATER TYPE STREAM, PERENNIAL	AU IR CATEGORY 5/5B SIZE 10.44 MILES	LOCATION DES HUC: 13020202 ASSESSED 2024	Jemez MONITORING SCHEDULE 2031		
AU Comment: O aluminum concer East Fork Jem	WQS REF 20.6.4.108 ATTAINMENT	waters) WATER TYPE STREAM, PERENNIAL	AU IR CATEGORY 5/5B SIZE 10.44 MILES	LOCATION DES HUC: 13020202 ASSESSED 2024	Jemez MONITORING SCHEDULE 2031		
AU ID NM-2106.A 10 USE DWS	WQS REF 20.6.4.108 ATTAINMENT Fully Supporting	waters) WATER TYPE STREAM, PERENNIAL	AU IR CATEGORY 5/5B SIZE 10.44 MILES	LOCATION DES HUC: 13020202 ASSESSED 2024	Jemez MONITORING SCHEDULE 2031		
AU Comment: O aluminum concer East Fork Jem AU ID NM-2106.A_10 USE DWS FC	WQS REF 20.6.4.108 ATTAINMENT Fully Supporting Not Assessed	waters) WATER TYPE STREAM, PERENNIAL CAUSE(S) Temperature Aluminum, Total Recoverable	AU IR CATEGORY 5/5B SIZE 10.44 MILES FIRST LISTED 2024 2016	fy appropriate/attai LOCATION DES HUC: 13020202 ASSESSED 2024 TMDL DATE	Jemez MONITORING SCHEDULE 2031 PARAMETER IR CATEGORY 4A 5/5B		
AU ID AU ID NM-2106.A_10 USE DWS FC HQColdWAL	WQS REF 20.6.4.108 ATTAINMENT Fully Supporting Not Assessed Not Supporting	waters) WATER TYPE STREAM, PERENNIAL CAUSE(S) Temperature Aluminum, Total Recoverable	AU IR CATEGORY 5/5B SIZE 10.44 MILES FIRST LISTED 2024 2016	fy appropriate/attai LOCATION DES HUC: 13020202 ASSESSED 2024 TMDL DATE	Jemez MONITORING SCHEDULE 2031 PARAMETER IR CATEGORY 4A 5/5B		
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Public Participation Process

- □ CALM 30-day public comment period plus data solicitation or "call for data"
- □ Draft 2026-2028 §303(d)/§305(b) Integrated List 45-day public comment period
- □ SWQB provides response to public comments submitted regarding Integrated List
- □ SWQB requests WQCC approval of §303(d)/§305(b) Integrated Report
- SWQB submits IR to EPA Region 6 for final approval
- §303(d)/§305(b) Integrated Reports are used to inform EPA public outreach programs such as How's My Waterway- https://mywaterway.epa.gov/



Public Participation Process (cont.)

- All notices of public comment periods and data solicitations are posted on the SWQB website and emailed to the SWQB GovDelivery email list.
- □ Email list currently has 1,916 subscribers.
- To subscribe to the SWQB GovDelivery email list
 - scroll to the bottom of the SWQB main page and click "subscribe" or
 - follow this direct linkhttps://public.govdelivery.com/accounts/NMED/subscriber/new?topic_id=NMED_4





Data Solicitation Process

- □ SWQB seeks chemical, physical, and biological data collected from streams, rivers, and lakes in New Mexico. Recent data (within the last 5 years) is required.
- □ The data package needs to include:
 - Contact information for the group, agency, or individual who collected the data
 - Data in electronic format (Excel or compatible)
 - QA/QC information for the dataset
- Data submittal information available online:

www.env.nm.gov/surface-water-quality/data-submittals/

- Data submittal guidelines
- Data submittal template
- A data quality determination letter is developed for each submitted dataset, provided to the entity submitting data, and posted to SWQB-IR website.



Data submittal website

- Contains information for data submitters, especially submitting outside our regular data collection processes (319, RSP, permittees etc.)
- Contains templates for submitting data to SWQB



SWQB prepares and submits an assessment of surface waters in the Clean Water Act (CWA) \$303(d)/\$305(b) Integrated Report and List every even-numbered year. Although our monitoring section collects data during our rotational watershed surveys to update water quality assessments of a number of waterbodies each listing cycle, we realize that many other organizations, both within and outside of state government, may also collect water quality data that may be incorporated into development of the Integrated List.

Data submittal downloads/links:

Data Template

Long Term Deployment (LTD) Data Template

Data Submission Guidelines

What kind of information is needed?

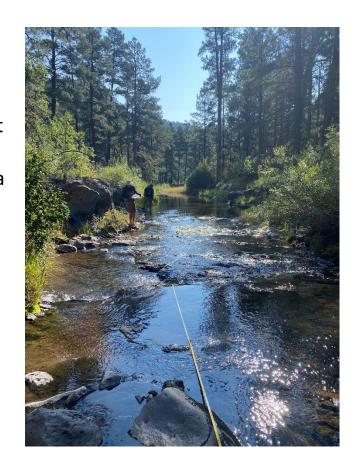
SWQB is specifically seeking chemical, physical, biological, habitat, and bacteriological (i.e., E. coli) data for any streams, rivers, lakes, and reservoirs in the state, preferably acquired within the last 5 years, that can be compared to water quality standards published in 20.6.4 NMAC. Watersheds of particular interest vary depending upon our most recent rotational watershed surveys. See the list of recent surveys here.

How to submit data and supporting information

https://www.env.nm.gov/surface-water-quality/data-submittals/

Data types

- Data sought/accepted: IN-STREAM chemical, physical and biological data
 - In-stream data for which we do not have standards or assessment protocols (e.g., Rosgen, NmRAM) may be useful during TMDL development or planning but cannot be used directly in assessing waterbodies
 - QAPPs should also be submitted if not already a part of a project
- Data <u>NOT</u> accepted:
 - Effluent data cannot be assessed
- Submittal of in-stream data may not be a permit requirement, but it is an EPA requirement for 303(d) List to use "readily available data" within the state
- Data is time intensive if not formatted per our webpage/templates or collected according to our SOPs: https://www.env.nm.gov/surface-water-quality/data-submittals/





External Data Submittals Last Cycle

For the 2024-2026 listing cycle, data packets were received or acquired from the following sources:

- Amigos Bravos
- Anthony Water & Sanitation District
- Bosque Ecosystem Monitoring Program (BEMP)
- Bureau of Land Management (BLM)
- Cimarron Watershed Alliance
- LANL (downloaded via Intellus New Mexico)
- San Juan Soil and Water Conservation
 District
- Silver City Watershed Keepers
- Trout Unlimited
- Pathfinder Environmental Inc., and UPWA

2024-2026 Supporting Documents and Websites

- Comprehensive Assessment and Listing Methodology (CALM)
- Assessment Rationale (ROD)
- · Data Submittal Information
- 2024 IR External Data Quality Determinations
- 20.6.4.114.B NMAC radionuclides public disclosure memo
- IR Category 4B Demonstration for Sandia Canyon
- · Public Notice (English) (Español) & Public Involvement Plan

https://www.env.nm.gov/surface-water-quality/303d-305b/



SWQB prepares and submits an assessment of surface waters in the Clean Water Act (CWA) \$303(d)/\$305(b) Integrated Report and List every even-numbered year. Although our monitoring section collects data during our rotational watershed surveys to update water quality assessments of a number of waterbodies each listing cycle, we realize that many other organizations, both within and outside of state government, may also collect water quality data that may be incorporated into development of the Integrated List.

Data submittal downloads/links:

Data Template

Long Term Deployment (LTD) Data Template

Data Submission Guidelines

https://www.env.nm.gov/surface-water-quality/data-submittals/

 Data submitters are encouraged to submit data at <u>any time</u> prior to the official "Call for Data" during summer 2025 to allow for ample time to review the data and spot issues Meredith Zeigler, Assessment Coordinator

Meredith.Zeigler@env.nm.gov

Emily Miller, Quality Assurance Officer

emily.miller@env.nm.gov

Heidi Henderson, TMDL and Assessment Team Supervisor heidi.henderson@env.nm.gov

NMED-SWQB CWA §303(d)/§305(b) Integrated Report-

www.env.nm.gov/surface-water-quality/303d-305b/

NMED-SWQB Data Submittal Informationwww.env.nm.gov/surface-water-quality/data-submittals/

Reimbursement Process Updates

Sam Ferguson
River Stewardship Program Coordinator

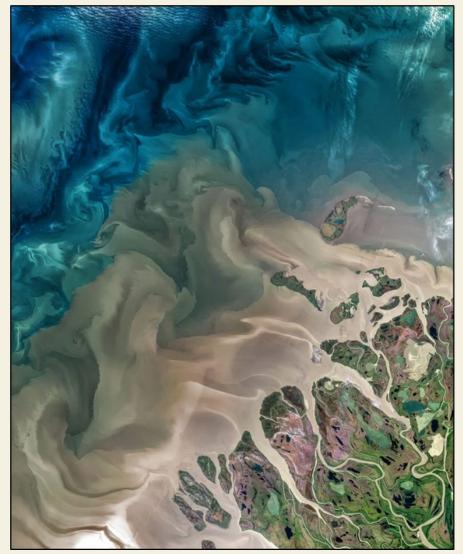
Sam Rendon SWQB Financial Manager



New Reimbursement Procedure

 Applies to all Fiscal Year (FY) 2025 contracts and agreements and beyond

Opt-in available for contracts issued prior to FY25 (July 1, 2024)



Mackenzie River Delta, Canada, unknown

Cooperator Monitoring & Compliance

Sam Rendon

SWQB Financial Manager



Cooperator Monitoring and Compliance Program

□ Why?

- Federal requirement to receive EPA Clean Water Act grants (2 CFR 200.205)
- Agency audit finding

Purpose

- To comply with federal grant terms requiring monitoring of sub-grantees to ensure compliance with programmatic and financial laws and regulations.
- Ensures cooperators are adhering to grant terms and conditions, within budget, effectively performing, and internal controls are in place.



Cooperator Monitoring and Compliance Program

How it Works

- NMED internal procedure occurring:
 - Pre-award assessment
 - Monitoring during the agreement term
 - Post-award assessment
- NMED performs risk assessments and monitors cooperator according to risk level assigned
- NMED will consider the performance of cooperators for future procurements



Pre-Award Assessment

Pre-Award Risk Ass	essme	ent									
Subrecipient Name: Project Year: From the date of the signed agreement											
Federal Award Identification Number(s) or ALN (CFDA) Number:	1										
Program Name(s):	nths = Year 2	2									
Risk Assessment Completed Date: 24-36 Months = Year 3 3											
Project Period(s):	37+ Month	ns = Year 4	4								
Total Score:			0								
Risk Assessment:		Lov	w Risk								
Eligible to Conduct Business with the State (answering yes to any of these receive funds) Is the entity on the federal debarment list (www.sam.gov)? Conduct Business with the State (answering yes to any of these receive funds)	questions i	esults in ineligil	bility to	Yes/No							
2. Amount		Small	Medium	Large							
Agency set the Criteria for determining size of grant:		\$0 - \$100k	\$100K-\$750k	>\$750k							
Amount of the award (If award amount is unknown, an estimated award amount so be used.)	hould										
3. Funding of Entity		<u>Small</u>	<u>Medium</u>	<u>Large</u>							
Agency set funding criteria:		<15%	15%-60%	>60%							
What percentage of funding would this grant be for the entity in comparison entity's total funding?	to the										
4. Accounting System		Automated	Manual	Combo							
Type of accounting system used by the entity											
5. Project Complexity	Not Complex	Slightly Complex	Moderately Complex	Highly Complex							
Rate the complexity of the program											
Projects with complex compliance requirements have a higher risk of non-compliance. In your determination of complexity Numerous programmatic requirements and/or must strictly adhere to regulations Matching funds or Maintenance of Effort are required The entity further subcontracts out the program											



Pre-Award Assessment

Yes/No

6.II. Entity Risk (Questions Must Be Answered for Medium and Large Grants)	Yes/No
a. Does the entity have prior experience with similar programs?	
b. Does the entity maintain policies which include procedures for assuring compliance with the terms of the	
award?	
c. Does the entity have an accounting system that will allow them to completely and accurately track the receipt	
and disbursements of funds related to the award?	
d. If applicable, does the entity have a system in place which can track employee time spent on multiple programs?	
e. If applicable, does the entity have a procurement system or procedures in place that meet the minimum federal	
requirements for procurement?	
f. If applicable, has the entity worked with selected subcontractors previously?	
g. If applicable, does the entity have an adequate system or procedures in place for tracking and evaluation of in- kind match?	
h. Has the entity been audited in the past 3 years? (select N/A if has been in business for less than this amount of time)(Per 2 CFR 200.501, this is required for all entities who receive over \$750,000 in federal funds annually.)	
i. Did the entity have one or more audit findings in their last single audit regarding program non-compliance and/or significant internal control deficiency?	
j. Are there currently any unresolved audit issues?	
k. Does the entity carry insurance that meets the states minimum requirements?	
1. Other issues that may indicate risk of non-compliance? (List issues in the box below. If more than one, list point value	
next to each one, add points together and put total into the green point-value box.)	

Examples of other issues: (1) having new or substantially changed systems or software packages, i.e. accounting, payroll, reporting, technology, administration; (2) turnover in personnel, i.e. business, award management, program; (3) external risks including: economic conditions, political conditions, regulatory changes & unreliable information; (4) loss of license or accreditation to operate program; (5) new activities, products, or services; (6) organizational restructuring; (7) where indirect costs are included, does the organization have adequate systems to segregate indirect

from direct costs.



Pre-Award Assessment

7. Prior Grant Award Experience (must be completed for All sizes of grants) (Not for a new entity.)									
7. Prior Grant Award Experience (must be completed for All sizes of grants) (Not for a new entity.)									
a. Were performance and financial reports submitted timely for prior grant awards? (i.e. within the agency specified timeframe)									
b. Were financial reports accurate for prior grant awards?									
c. Did the entity stay on budget in prior years?									
d. Did the entity adhere to all terms and conditions of prior grant awards?									
e. Was reasonable progress made towards performance goals for prior grant awards?									
f. Did the entity and its staff members respond to State requests timely during prior grant awards?									
g. Does the entity plan to carry multiple projects?									
h. Do the results of monitoring procedures at the entity in prior years indicate any areas of concern or higher risk?									
Low = 0 - 85 Moderate = 86 - 170 High = 170 and higher TOTAL RISK POINTS:	0								
Additional notes and ongoing risk assessment concerns for entity:									
I declare and affirm that all the information listed above is to the best of my knowledge and belief and is in all things true an	nd accurate.								
I declare and affirm that all the information listed above is to the best of my knowledge and belief and is in all things true an Project Officer:Date:									



Pre-Award Assessment – Risk Levels

Low Risk: Most of the following attributes should be present to be considered low risk

- ► Small grant amount
- Entity has complied with the terms and conditions of prior grant awards
- No known financial management problems or financial instability
- High quality programmatic performance
- No, or very insignificant, audit or other monitoring findings
- ► Timely and accurate financial and performance reports
- Program likely does not have complex compliance requirements
- Entity has received some form of monitoring (e.g., single audit, on-site review, etc.)

Moderate Risk

New business

Small entity handles a complex grant with multiple requirements

A disclosed conflict of interest exists

High Risk

- History of unsatisfactory performance or failure to adhere to prior grant terms and conditions
- Financial management problems and/or instability; inadequate financial management system
- Program has highly complex compliance requirements
- Significant findings or questioned costs from prior audit
- Large award amount



Risk Level – Monitoring Plans

RISK LEVEL	Monitoring Plan Guidelines
LOW (0-30)	Monitoring Plan: If the program scores are in the low level category the following will occur: the Program Manager will continue to monitor the program progress and performance along with all financial reports for accuracy, timeliness and compliance per standard monitoring practices and state/federal guidelines.
	• The program will receive at least one standard site-visit during a twelve-month period. Monitoring Plan: If the program scores are in the medium level category the following will occur: the Project Office, through the approval of the Program Manager, will identify factors that contribute to the medium risk score. The Project Officer will provide a follow-up report to the sub-grantee that outlines areas of non-compliance as well as areas of needed improvement. The sub-grantee shall respond to SWQB with a Corrective Action Plan no more than 15 calendar days of receipt of the advisement.
MEDIUM (31-56)	Depending upon the severity of the score within the range, the assessment and follow- up may be conducted by way of a desk audit and/or an additional site-visit for the year. Additionally, the sub-grantee may be required to submit more frequent progress, performance and financial reports to SWQB as directed. The SWQB will provide technical assistance upon request of the sub-grantee.
HIGH (57-100)	(Monitoring plan requirements may be subject to change and/or additional requirements may be imposed depending upon the individual circumstances). Monitoring Plan: If the program scores are in the high level category the following will occur: the Project Officer, through the approval of the Program Manager, will identify factors that contributed to the high risk score. The Project Officer will provide a follow-up report to the sub-granteethat outlines areas of non-compliance as well as areas of needed improvement. The sub-grantee shall respond to SWQB with a Corrective Action Plan no less than 15 calendar days of receipt of the advisement letter. • Depending upon the severity of the score within the range, the assessment and follow-up will be conducted by way of program site-visits. Site-visit schedules will range from monthly to quarterly as deemed necessary by the SWQB. • Invoicing on a monthly basis. • Conference calls for status checks will be randomly conducted. • Additional grant/fiscal management training requirements will be imposed. • The SWQB will provide technical assistance upon request of the sub-grantee. (Monitoring plan requirements may be subject to change and/or additional requirements may be
	 Conference calls for status checks will be randomly conducted. Additional grant/fiscal management training requirements will be imposed. The SWQB will provide technical assistance upon request of the sub-grantee.



Monitoring (during agreement)

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Post-Award Assessment

			Programmatic Risk Le	vel			
	Low Risk		Moderate Risk		High Risk		
Criteria	Description	Weight	Description	Weight	Description	Weight	Score

1. Staffing:							
Qualifications - Programmatic	Staff in key positions are professionally trained and have one year's or more experience in that position AND have completed any Agency (NMED) required trainings.	1	At least half of staff in key positions are professionally trained for the position they hold but have less than one year experience.	2	Staff in key positions have little or no experience or training in program area being funded	3	
Qualifications - Grant Management	Staff in key positions have one year or more experience managing federal grants AND have completed any Agency (NMED) required trainings.	2	Staff in key positions have less than one year experience managing federal grants AND have completed any Agency (NMED) required trainings.	4	Staff in key positions have less than one year experience managing federal grants AND have NOT completed any Agency (NMED) required trainings.	6	
Turnover A	No change in programmatic staff in key positions	2	New staff in 1 or more key programmatic positions	4	Programmatic staffing to be hired with this awards funding	6	
Turnover B	No change in grant administrative staff in key positions	2	New staff in 1 or more key grant administrative position	4	New or no agency (grant) administrator and/or fiscal officer	6	



Post-Award Assessment

			Programmatic Risk Le	vel			
	Low Risk		Moderate Risk		High Risk		
Criteria	Description	Weight	Description	Weight	Description	Weight	Score
2. History of Me	eting Programmatic Requiremen	ts:					
Goals and Objectives	Agency has provided services and met program objectives specified in contract within the last 2 years	2	Program Manager suspects possible weaknesses in service delivery/program objectives based on information received in the past fiscal year.	4	Program history within the past 2 years includes weaknesses in service delivery/program objectives OR Agency is in its first year of funding (no basis for evaluation)	6	
Data and Evaluation	Agency has clear data collection and project evaluation plan	2	Agency has weak data collection and project evaluation plan	4	Agency has no data collection and project evaluation plan	6	
Sustainability	Project is mature with multiple funding streams and sustainability plan in place	2	Project is new, but there is a sustainability plan in place	4	Project is new and there is no sustainability plan in place	6	
Reporting	Program and fiscal reports are consistently submitted in a timely and accurate manner	2	Routine reports are submitted timely but contain errors or information is omitted	4	Routine reports are not submitted on time OR the incorrect report is submitted OR Agency is new	6	



Post-Award Assessment

			Fiscal Risk Level				
	Low Risk		Moderate Risk		High Risk		
Criteria	Description	Weight	Description	Weight	Description	Weight	Score
Grant Amount Requested	Sub-grantee application is for less than \$25,000	2	Sub-grantee application is for more than \$25,000 but less than \$50,000.	4	Sub-grantee application is more than \$50,000.	8	
Grant Period	Grant period is for 2 years or less	1	Grant period is for 3 years	2	Grant period is for 4 or more years	3	
Total Funding (State & Federal) Annually	All Awarded State/Federal Funds granted to the agency from any Federal Agency are less than \$25,000 per fiscal year	2	All Awared State/Federal Funds granted to the agency from any Federal Agency are from \$25,000 to \$99,999 per fiscal year	4	All Awarded State/Federal funds granted to the agency from any Federal Agency are \$100,000 or over per fiscal year	6	
Budget – Categories A	Budget includes only CAT200 personnel line items OR only CAT400 supplies, equipment, travel, and 'other' line items	2	Budget includes more both 200CAT and 400CAT line items	4	Budget includes CAT300 contracts	8	
Budget – Categories B	Reversion History averarge < 5% of award	2	Reversion History average 6% - 15% of Award	4	Reversion History average >15% of award	8	
Procurement	Sub-grantee follows State procurement code	2	NO MEASURE		Sub-grantee does not follow State procurement code	6	
Single Audit Requirement	No significant fiscal findings for 2 years	2	Minor fiscal findings within last two years	4	Significant fiscal finding within the past 2 years OR no fiscal monitoring has been conducted in past 2 years OR had a finding for questioned costs OR new agency	6	
On-site Monitoring Federal	In the last 2 years, this agency received an on-site fiscal review by an auditor	2	In the last 2 years, this agency received a fiscal desk review by an auditor	4	In the last 2 years, agency did not receive an on-site fiscal review by a program monitor OR new agency	6	
On-site Monitoring – State SAA	In the last 2 years, this agency received an on-site fiscal review by State SAA	2	In the last 2 years, this agency received a fiscal desk review by State SAA	4	In the last 2 years, agency did not receive an on-site fiscal review by State SAA OR new agency	6	



