



UNITED STATES DEPARTMENT OF EDUCATION

OFFICE OF FINANCE AND OPERATIONS

OFFICE OF GRANTS ADMINISTRATION

August 14, 2020

Superintendent Jon Fernandez
Guam Department of Education
501 Mariner Avenue
Barrigada, Guam 96913

Department of Education Office of the Superintendent	
Date: 8/27/20	Time: _____
Rec'd By: <i>mana</i>	<i>2020/8/27/20</i>
Print Name	Signature

Dear Superintendent Fernandez,

The purpose of this letter is to convey to you the final determination report by the U.S. Department of Education (the Department) for the Reconsideration Evaluation Plan (REP) Virtual Monitoring conducted on July 13-15, 2020 (July 14-16, 2020 Chamorran time). The REP Virtual Monitoring team was comprised of Department staff from the Risk Management Services Division (RMSD), Office of Elementary and Secondary Education (OESE) and Office of Special Education Programs (OSEP). The virtual monitoring, conducted in lieu of an onsite visit, also included validating the documentation submitted between September 2019 and June 30, 2020 by your Chief Internal Auditor, Frank Cooper- Nurse, in response to several of the task deadlines in the REP. In addition to the REP Virtual Monitoring Report, I am also enclosing an updated REP document, which includes notations within the "Completion Status" column, based on the results of the virtual monitoring review and the documentation submissions received as of June 30, 2020.

The results of the review indicate that GDOE has made notable progress on addressing the tasks within the REP. Based on this progress, the Department will remove several of the requirements now placed on GDOE. After interviewing several GDOE staff and discussing the time certification process, the Department will remove two of the four required GDOE signatures as part of the bi-weekly employee time certification and reimbursement processes. Other items that will be reduced or transitioned back to GDOE are noted in the updated REP attached.

While GDOE has made noted progress on resolving the REP tasks, there are several areas within the REP that have yet to be fully implemented, including standard operating procedures (SOP) that are either not approved or updated with associated GDOE staff training completed.

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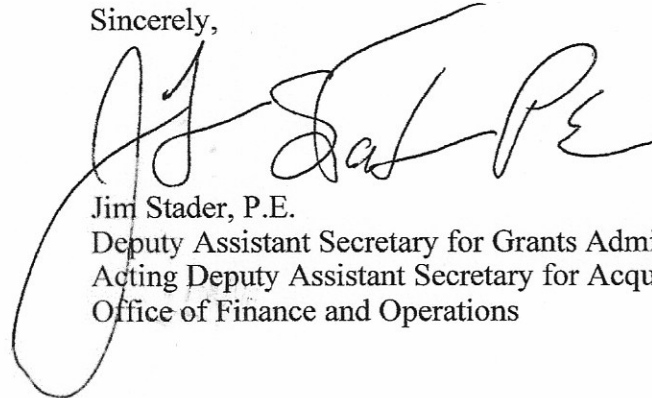
The Department of Education's mission is to promote student achievement and preparation for global competitiveness by fostering educational excellence and ensuring equal access.

Additionally, the Department anticipates the submission for review, once approved, of the SOP for the bi-weekly time certification process that is applicable to all federally funded staff. Several processes have previously been returned to GDOE control, based on the third-party fiduciary agent (TPFA) providing targeted training for GDOE staff to assume these responsibilities in the areas of procurement and indirect cost proposal preparation.

It is also noted that a recent attempt by the TPFA to return the property management physical inventory process back to GDOE control was unsuccessful and resulted in an inaccurate physical inventory, and a major delay in completing and disseminating the 2018 physical inventory report by the responsible GDOE staff at the time. However, upon further review of this REP area during the virtual monitoring process, and in consideration of the progress GDOE has made in this area, the Department will remove the requirement for TPFA oversight of the physical inventory process on a 6-month probationary basis beginning August 31, 2020 and concluding January 31, 2021. During this period, the Department will rely on the TPFA to closely monitor the process and confirm GDOE staff's ability to sustain the improvements and ultimately their readiness to assume the responsibilities of the TPFA on a permanent basis. Should progress begin to decline during this probationary period, the Department will reinstate TPFA control of this process. This temporary modification will be reflected in amended FY2020 specific conditions, which will be reviewed at the conclusion of the probation period.

I congratulate you on the progress that GDOE has made to address the many fiscal challenges identified over the years. The progress made to date is a demonstration of your commitment to continued improvements towards ultimately regaining full control of federal education funds management. In the meantime, RMSD staff will continue to engage with you and your leadership team as you progress toward completing the REP. If you have any questions or would like to discuss the results of the REP Virtual Monitoring Report and/or the status of the REP, please contact Christine Jackson at (202) 615-3663 or via e-mail at christine.jackson@ed.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "J Stader PE", written over a large, loopy flourish that extends from the bottom left of the signature area.

Jim Stader, P.E.
Deputy Assistant Secretary for Grants Administration
Acting Deputy Assistant Secretary for Acquisition Management
Office of Finance and Operations

Attachment: Updated Reconsideration and Evaluation Plan

cc: Frank Brogan, Assistant Secretary Elementary and Secondary Education