Guam Department of Education

Comprehensive Corrective Action Plan Quarterly Progress Report

For the Period Beginning July 1, 2017 and September30, 2017

Presented to the U.S. Department of Education in Fulfillment of the Federal Fiscal Year 2017 Special Conditions

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Contents

Reports and Report Format

As stated in the approved Comprehensive Corrective Action Plan (CCAP), the Special Conditions require GDOE to provide quarterly reports to the US Department of Education (ED) on the Guam Department of Education's (GDOE) progress in implementing measures required under the CCAP. While the Special Conditions do not specify a particular format for the progress reports, it is anticipated that each report will, at a minimum, include the implementation status for each activity, highlight any risks associated with successful completion, and also identify any changes which would require modifying actions and/or timelines. Feedback regarding format and content is not only welcomed, but encouraged.

Executive Summary

Employee Time Tracking (ETT) required actions and activities are being updated. Time distribution reports (TDR) were provided quarterly as part of preparation of quarterly grant reports. However, the three-way match between the grant, federal roster and labor distribution reports was not progressing as planned. The TPFA and Federal Programs has been reviewing proceudres to recommend changes to address concerns. GDOE staff has been assigned to work alongside of Third Party Fiduciary Agent (TPFA) to understand and learn TPFA procedures related to payroll review and reimbursement.

Required actions and activities related to GDOE Financial Management Information System (FMIS) are completed. Tasks related to optimizing use of the FMIS are ongoing. FMIS staff are working to roll out enhancements for procurement. Staff has been working with end users to update information and procedures related to grant master. MUNIS training conducted during summer months were designed to sharpen staff skills as staff become more familiar with MUNIS.

Internal Controls and Procedures required actions and activities are completed. Audits of Standard Operating Procedures (SOP)s related to procurement, Schedule of Expenditures of Federal Awards (SEFA), and TDRs continued through this quarter. Internal audit worked with appropriate staff to address audit findings and management letter comments. Reviews, needed updates and training on SOPs continue and are conducted at least annually.

Additional funding for a program coordinator to assist with contract management and warehouse manager was not provided in the Fiscal Year (FY)18 budget submission appropriated by the Guam Legislature. Recruitment of vacant Property Management Officer (PMO) and Buyer on hold due to hiring freeze.

Procurement required actions and activities are completed. Procurement continues to generate reports on requisitions and open purchase orders as well as conduct regular meetings with project directors and division heads. Vendor evaluations have been included in ongoing procurements. Most of the Property Management required actions and activities are complete. The Fixed Asset Inventory Report was issued this quarter and planning for the 2018 Fixed Asset Inventory has begun.

Completion Risk Key:

Risk Level High – Deliverables / objectives will not be completed in a timely manner;
Risk Level Moderate – Deliverables / objectives may not be completed in a timely manner; and
Risk Level Low – Deliverables / objectives will be completed in a timely manner.

Employee Time Tracking

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
ETT-1: GDOE will develop and implement effective policies and procedures that provide for an effective process for tracking and reporting time spent by all employees whose salaries are paid with US ED grant funds. **ETT-2**: Ensure that the salaries of employees who work under more than one Federal program and/or grants are properly allocated among those programs/grants, in accordance with accurate time distribution records. **ETT-3**: Research and implement an automated time collection system for federally funded employees.	Labor distribution reports provided Wednesday before payday to TPFA and Federal Programs. Federal Programs and Special Education provide initial analysis to TPFA. Although it was previously reported TPFA authorizes drawdowns of 95% of gross payroll for payment on Monday after payday, this is not the case. The TPFA continues to perform a match against the federal roster and reimburses based on that review. TPFA works with Federal Programs to clear salaries and issues on error list for balance. GDOE PULSE reports continue to be used to update rosters needed for three way match of payroll. Time Distribution Reports are provided quarterly as part of the quarterly grant updates provided to USDOE. TPFA has indicated that this system has not worked due to multiple submission errors. Staff have been transferred so that salaries are 100% charged against a single grant. Staff has been identified to work alongside the TPFA to be trained in TPFA 3 way match procedures. Weekly meetings have been scheduled to resolve any questions or concerns.	Half day training on Time & Effort scheduled for Consolidated Grant key projects personnel, School Administrators, and all timekeepers on October 19, 2017. Three (3) Consolidated Grant projects are piloting a Time Certification & Attendance Log. TPFA has directed payroll reimbursement to occur with bi-weekly time certifications beginning with FFY17. FSAIS is working with GDOE staff to develop an automated MUNIS Time & Effort report. GDOE has begun discussions with MUNIS to identify automated time keeping.

Implementation Deliverables	Completion Risks
ETT-1 to ETT-3, Continued Written and approved SOPs, including training for applicable GDOE personnel, to ensure: • accurate and up-to-date employee staffing lists based on notices of personnel actions (from Personnel Division and validated by FPD and LEA programs); • accurate and timely time distributions among funding sources for split-time employees, and proper allocation of salary costs among funding sources (from respective programs and validated by FPD and LEA programs); • accurate and properly executed time distribution reports and attendance records (from respective programs and validated by FPD and LEA programs); • properly executed and timely semiannual certifications (from respective programs and validated by FPD and LEA programs); • internal control checklists to ensure compliance with Circular A-87; and • identification of a computer-based and accurate time and attendance system, with documentation of requirements to support implementation, training and administration (validated by FPD and LEA programs).	Federal program staff balancing competing priorities causing delays in completion. Risk Level – High.

Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	TPFA payroll reconciliation reports Quarterly update to USDOE	Ignacio Santos, Federal Programs Administrator Taling Taitano, Deputy Superintendent

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-1: Detail design of a FMIS with processing functionality that complies with Generally Accepted Accounting Procedures, U. S. governmental accounting standards, and the Government Accounting Standards Board.	**COMPLETED** General ledger and procurement modules went live in April 2012. Human resource and payroll modules went live in August 2012.	**COMPLETED** No further steps necessary.
Implementation Deliverables	**Completion Risks**	
Detail system design specifications approved by GDOE Finance and Administration management.		
Schedule Based upon Performance Plan	**New Deliverables Completed This Quarter**	**Responsible Person/Department**
Completed		Taling Taitano, Deputy Superintendent

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-2: Basic installation is now complete. The routine maintenance and enhancement will be reported in this section. Items completed this period and open enhancements appear in the columns to the right.	**COMPLETED** GDOE has a service contract with Tyler MUNIS for software maintenance and updates. GDOE has upgraded from the originally installed software, version 9.3, four times and is currently on version 11.1. If FSAIS or FMIS staff are unable to resolve system issues, Tyler MUNIS help desk is contacted. GDOE teams have been to Tyler MUNIS Connection conferences 3 times since the system installation in 2012. The team continues to look for opportunities to use system tools to make work more efficient. **2.F Purchase+** 2.F.2 Test Purchase+ functionality in Test Environment 2.F.3 Adjust setting and infrastructure as per test findings. Retest. **2.G Employee Expense (Local Mileage)** 2.G.10 Finalize & document process in SOP and End User Instructions as needed 2.G.11 Train users on Employee Expense (ESS) for mileage reimbursements on GDOE MUNIS 2.G.12 Roll out for Department wide use **2.L Grant Master** 2.L.2 Create checklist of steps to be taken in MUNIS to set up the Module 2.L.3 Build and test limited Grant Master Listing in test environment using checklist 2.L.4 Adjust setting and infrastructure as per test findings. Retest. **2.M ESS (Employee Self-Serve) Leave Request** Requested quote from Tyler MUNIS to allow attachments in ESS; continuing to follow up, no response to date	**2.F Purchase+** 2.F.4 Meet with Management regarding Purchase+ process, requirements as tested and Management's desired outcomes 2.F.5 Create End Users instructions (incorporate in Desk Top Procedures) 2.F.6 Train End Users (buyers) 2.F.7 Train End Users (Schools & Divisions) 2.F.8 Roll out Purchase+ **2.L Grant Master** 2.L.5 Present system capabilities with adjusted set up 2.L.6 Build Grant Master (listing complete with current active grants) in Live environment per updated checklist 2.L.7 Create End User instructions (incorporate in Desk Top Procedures) and proposed adjustments to SOPs if necessary 2.L.8 Train End Users. **2.M ESS (Employee Self-Serve) Leave Request** Follow up on requested quote from Tyler MUNIS to allow attachments in ESS. **2.S Transition** 2.S.1 MUNIS system management / updates – TPFA is required to maintain control over TPFA MUNIS system as long as TPFA is mandated FMIS team is polling End Users and developing list of new initiatives Planning for next upgrade to begin this quarter. Next upgrade tentatively scheduled for March 2018.

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-2 Continued:	**2.Q Fixed Assets** 2.Q.6 Create or adjust existing End User Instructions (DTPs) 2.Q.7 Train end users	

Implementation Deliverables	Completion Risk	
A secure, reliable and fully integrated FMIS that supports the financial management of US ED grant awards and complies with federal requirements. Detailed and up-to-date system and application documentation necessary to manage and sustain the FMIS and its applications on an ongoing basis. Sufficient qualified and trained accounting staff to manage all financial processing and reporting required by GDOE.	Build and Roll-out of Modules by target dates dependent on the availability of the division staff per respective module, and the responsiveness of Tyler Technologies. Risk Level—Medium.	

Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
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Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-3: Continued activities of the Agent to oversee all US ED funds awarded to GDOE until a credible financial management system is implemented and fully operational, and GDOE has demonstrated that it can be accountable for US ED funds in accordance with all federal requirements.	Ongoing until condition removed by USDOE. TPFA continues to manage all federal grant funds from GDOE using an independent MUNIS system and separate bank accounts. **2.S FMIS Transition - Ongoing** **8.A Accounts Payable - Ongoing** **8.B Reporting & Accountability – Ongoing** **8.B.2 & 8.B.10** Draft late liquidation SOP circulating for comment **8.C. Accounting / GL** GDOE procurement staff continues to use TPFA system for procurement processing and issues open requisition and purchase order reports to end users. GDOE also provides accounts payable support. TPFA has trained budget staff on uploads of USDOE grant budgets into TPFA system. GDOE Accounting staff issues monthly grant status report. GDOE staff updates GDOE system based on receipt and retirements of fixed assets and provides supporting documentation to TPFA for updates to the TPFA system. Meetings with TPFA as needed are held to coordinate activities and resolve any concerns. TPFA supporting audit by providing details as requested by auditors. GDOE PULSE reports continue to be used to update rosters needed for three way match of payroll. Staff identified to shadow TPFA in payroll reimbursement procedures. Concerns with payroll reimbursement procedures creating delays in reimbursements.	Continued operation of the TPFA independent financial management system and bank accounts will continue. GDOE and TPFA are looking into areas to transfer responsibilities to GDOE. **8.B Reporting & Accountability** 8.B.2 Transition the late liquidation process to Federal Programs. Includes preparing late liquidation requests & following up with vendors and end users 8.B.10 Late Liquidation management - ensure that there is coordination of effort between the business office, procurement and federal programs in order to handle the late liquidations effectively. Includes vendor follow-up. Plan for migration of historical data on TPFA system to GDOE system upon TPFA exit.

Implementation Deliverables	Completion Risks	
FMIS-3, Continued. A stable and reliable financial information systems processing environment. US ED funds expended only for costs that are allowable under the respective grant programs. Allowable costs procured in accordance with applicable procurement requirements. Coordinated timing of US ED draws and reimbursements to ensure that payments to staff, vendors and providers are prompt and timely. Grant funds that are charged only for costs resulting from obligations that were properly made during the funds' period of availability, including any carryover period.		
Schedule Based upon Performance Plan	**New Deliverables Completed This Quarter**	**Responsible Person/Department**
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	Routine • Requisition in Progress Reports – Weekly • Open Purchase Order Reports – Monthly • Grant Status Report – Monthly • Download from GDOE Fixed Assets Module	Taling Taitano, Deputy Superintendent

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-4 Moving to the next level and sustaining the progress that has been made to date. A program of End User Training and routine review of Standard Operating Procedures will be established.	**COMPLETED** End user training occurring at least annually. Review of SOPs and related training occurring at least annually. **6.B SOP 200-017: Month End & Year End Closing** 6.B.2 Staff Training on SOP 6.B.3 Staff Acknowledgement Forms 6.B.4 Amendment to SOP – Determined update not necessary 6.B.5 Amendment to SOP Approved by Superintendent – Determined update not necessary **6.D SOP 200-022: Bank Reconciliation Procedures** 6.D.4 Amendment to SOP 6.D.5 Amendment to SOP Approved by Superintendent **6.E SOP 200-028: General Ledger Policy & Procedures** 6.E.4 Amendment to SOP 6.E.5 Amendment to SOP Approved by Superintendent **6.F SOP 200-029: Local Mileage Reimbursements** 6.F.2 Staff Training on SOP 6.F.3 Staff Acknowledgement Forms 6.F.4 Amendment to SOP 6.F.5 Amendment to SOP Approved by Superintendent **6.H SOP 200-039: Federal Grants Accounts Receivable** 6.H.4 Amendment to SOP 6.H.5 Amendment to SOP Approved by Superintendent **6.J SOP 200-042: Revenue Control & Management Policy** 6.J.4 Amendment to SOP 6.J.5 Amendment to SOP Approved by Superintendent	Continuous MUNIS End User Training Related Activity • Training during and around Spring, Summer and Christmas breaks • Conducting post surveys to focus training and determine effectiveness • Conduct other MUNIS End User targeted surveys to determine how to structure future training and support. Consolidated Grant workshop to cover Time & Effort, Procurement, Off-Island Travel and Fixed Asset procedures. **6.C SOP 200-021: Off-Island Travel Procedures** 6.C.2 Staff Training on SOP 6.C.3 Staff Acknowledgement Forms 6.C.4 Amendment to SOP 6.C.5 Amendment to SOP Approved by Superintendent **6.F SOP 200-029: Local Mileage Reimbursements** 6.F.2 Staff Training on SOP 6.F.3 Staff Acknowledgement Forms **6.G SOP 200-034: Accounts Payable & Cash Disbursement** 6.G.2 Staff Training on SOP 6.G.3 Staff Acknowledgement Forms 6.G.4 Amendment to SOP 6.G.5 Amendment to SOP Approved by Superintendent **6.H SOP 200-039: Federal Grants Accounts Receivable** 6.H.2 Staff Training on SOP 6.H.3 Staff Acknowledgement Forms

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-4, Continued	**6.M SOP 200-018: Sole Source Procurement** 6.M.8 IAO Testing of SOP **6.X SOP 200-023: Budget Preparation Process – Local Appropriation** 6.X.4 Amendment to SOP – Determined update not necessary 6.X.5 Amendment to SOP Approved by Superintendent – Determined update not necessary **6.Y SOP 200-024: Budget Entry Process** 6.Y.4 Amendment to SOP – Determined update not necessary 6.Y.5 Amendment to SOP Approved by Superintendent – Determined update not necessary **6.AH SOP 200-044: SEFA Reconciliation** 6.AH.4 Amendment to SOP 6.AH.8 IAO Testing of SOP In July, MUNIS training was held on the following: | Training	Attendees
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ESS&Pulse Navigation, PO receiving, PO status	60
Maintenance Service Requests	48
Time Entry	53
NAF	45		**6.J SOP 200-042: Revenue Control & Management Policy** 6.J.2 Staff Training on SOP 6.J.3 Staff Acknowledgement Forms **6.K SOP 200-015: Fixed Asset Management for Property Management Office & Central Receiving Warehouse** 6.K.2 Staff Training on SOP 6.K.3 Staff Acknowledgement Forms 6.K.4 Amendment to SOP 6.K.5 Amendment to SOP Approved by Superintendent **6.L SOP 200-019: Fixed Asset Management for Schools & Divisions** 6.L.2 Staff Training on SOP 6.L.3 Staff Acknowledgement Forms 6.L.4 Amendment to SOP 6.L.5 Amendment to SOP Approved by Superintendent **6.M SOP 200-018: Sole Source Procurement** 6.M.2 Staff Training on SOP 6.M.3 Staff Acknowledgement Forms 6.M.4 Amendment to SOP 6.M.5 Amendment to SOP Approved by Superintendent 6.M.9 IAO Reporting of Testing Results **6.N SOP 200-020: Open Purchase Order Monitoring & Reporting** 6.N.2 Staff Training on SOP 6.N.3 Staff Acknowledgement Forms 6.N.4 Amendment to SOP 6.N.5 Amendment to SOP Approved by Superintendent **6.O SOP 200-025: Procedures for Maintaining the Procurement File** 6.O.2 Staff Training on SOP 6.O.3 Staff Acknowledgement Forms 6.O.4 Amendment to SOP

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-4, Continued		6.O.5 Amendment to SOP Approved by Superintendent **6.P SOP 200-026: Competitive Sealed Bidding - IQBs** 6.P.2 Staff Training on SOP 6.P.3 Staff Acknowledgement Forms 6.P.4 Amendment to SOP 6.P.5 Amendment to SOP Approved by Superintendent **6.Q SOP 200-027: Competitive Sealed Bidding - IFBs** 6.Q.2 Staff Training on SOP 6.Q.3 Staff Acknowledgement Forms 6.Q.4 Amendment to SOP 6.Q.5 Amendment to SOP Approved by Superintendent **6.R SOP 200-030: Emergency Procurement** 6.R.2 Staff Training on SOP 6.R.3 Staff Acknowledgement Forms 6.R.4 Amendment to SOP 6.R.5 Amendment to SOP Approved by Superintendent **6.S SOP 200-031: Competitive Sealed Bidding - RFPs** 6.S.2 Staff Training on SOP 6.S.3 Staff Acknowledgement Forms 6.S.4 Amendment to SOP 6.S.5 Amendment to SOP Approved by Superintendent **6.T SOP 200-033: Competitive Multi-Step Sealed Bidding** 6.T.2 Staff Training on SOP 6.T.3 Staff Acknowledgement Forms 6.T.4 Amendment to SOP 6.T.5 Amendment to SOP Approved by Superintendent **6.U SOP 200-036: Request for Information Procedures** 6.U.2 Staff Training on SOP 6.U.3 Staff Acknowledgement Forms

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-4, Continued		6.U.4 Amendment to SOP 6.U.5 Amendment to SOP Approved by Superintendent **6.V SOP 200-037: Requisition Entry** 6.V.2 Staff Training on SOP

Implementation Deliverables	Completion Risks	
Establish End User Training Updated or new SOPs	Continued Training – Low SOP Update – Medium to High	6.V.3 Staff Acknowledgement Forms 6.V.4 Amendment to SOP 6.V.5 Amendment to SOP Approved by Superintendent **6.W SOP 200-040: Protest / Appeal Procedures** 6.W.2 Staff Training on SOP 6.W.3 Staff Acknowledgement Forms 6.W.4 Amendment to SOP 6.W.5 Amendment to SOP Approved by Superintendent **6.X SOP 200-023: Budget Preparation Process – Local Appropriation** 6.X.2 Staff Training on SOP 6.X.3 Staff Acknowledgement Forms **6.Y SOP 200-024: Budget Entry Process** 6.Y.2 Staff Training on SOP 6.Y.3 Staff Acknowledgement Forms **6.AE SOP 900-020: Personnel Allocation /Budget Entry Process** 6.AE.2 Staff Training on SOP 6.AE.3 Staff Acknowledgement Forms 6.AE.4 Amendment to SOP 6.AE.5 Amendment to SOP Approved by Superintendent 6.AE.8 IAO Testing of SOP 6.AE.9 IAO Reporting of Testing Results **6.AG SOP 1500-006: Payroll Processing** 6.AG.2 Staff Training on SOP 6.AG.3 Staff Acknowledgement Forms

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
FMIS-4, Continued		6.AG.4 Amendment to SOP 6.AG.5 Amendment to SOP Approved by Superintendent **6.AH SOP 200-044: SEFA Reconciliation** 6.AH.2 Staff Training on SOP 6.AH.3 Staff Acknowledgement Forms 6.AH.5 Amendment to SOP Approved by Superintendent 6.AH.9 IAO Reporting of Testing Results **6.AI SOP 200-38: Purchase Order Change Order** 6.AI.2 Staff Training on SOP 6.AI.3 Staff Acknowledgement Forms 6.AI.4 Amendment to SOP 6.AI.5 Amendment to SOP Approved by Superintendent

Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	**Amendment to SOP** SOP 200-022 Bank Reconciliation Procedures, updated 9/1/17 SOP 200-028 General Ledger Policy & Procedures, updated 8/30/17 SOP 200-029 Local Mileage Reimbursement, updated 10/3/17 SOP 200-039 Federal Grants Accounts Receivable, updated 9/6/17 SOP 200-042 Revenue Control & Management Policy, updated 10/3/17 **Staff Training on SOPs & Staff Acknowledgement Forms:** 200-017 Month End & Year End Closing Policy & Procedures 200-029: Local Mileage Reimbursements	Jacqueline Mesa, Management Analyst IV Franklin Cooper-Nurse, Chief Auditor Lourdes Perez, Comptroller – Business Office SOPs Marcus Pido, Program Coordinator III – Property Management SOPs Carmen T. Charfauros, Supply Management Administrator – Procurement SOPs Ignacio Santos, Federal Programs Administrator – Federal Programs SOPs Taling Taitano, DS FAS – Budget SOPs

Intergovernmental Agency Arrangements

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
Intergovernmental Agency Procedure-1 Guidance from USDOE's Title V-A Program Office regarding Intergovernmental Agency indicates that Title V-A does not authorize sub-grants to other agencies.	**COMPLETED** Per Federal Programs Administrator, this item should be closed. See May 28, 2016 email from Christine Jackson, *USDOE Response to GDOE Single Audit Finding Inquiry*	Based on Guidance provided by USDOE Program Office, the Federal Programs Division shall include within the respective Project Application, Intergovernmental Agency partnerships, if applicable. Also within the Budget Narrative, a new Object Code shall be established, object code 231, "Other Agencies, Partnerships, Collaboration, Intergovernmental Agencies".
Implementation Deliverables	**Completion Risks**	
Written Guidance provided by USDOE	Adaptation Risk – acceptance by which all partners are identified within the program application and subsequently approved within the Consolidated Grant Application by USDOE. Adherence to the procedures is minimal. Risk level – Low.	GDOE is waiting for written guidance in response to recent audit findings regarding intergovernmental agency procurements.
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
To be finalized upon submission of respective Consolidated Grant Application and approved by USEDOE's Program Office.		Ignacio Santos, Federal Programs Administrator

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-1: Over the next two years, GDOE will develop and implement a credible financial management system. Management will ensure employees are properly trained on new system and trained on the new standard operating procedures as a result of the new FMIS. This will ensure the system would provide the correct amount of funds, in the correct accounts, in a consistent and timely manner. Credible financial management includes systems, policies and procedures that (1) provide access to reliable information when needed, (2) account appropriately for funds, (3) ensure timely deposits or draw down of funds, (4) ensure timely and accurate payments, (5) otherwise enable and support generally accepted government financial management and accounting standards and requirements. Additionally, the financial management system will record and account for all draws and expenditures of federal education funds	**COMPLETED.** FY16 Financial and Single Audit issued May 2, 2017. Unmodified opinions, no material weaknesses, no questioned costs FY15 Financial and Single Audit issued June 6, 2016. Unmodified opinions, no material weaknesses, no questioned costs FY14 Financial and Single Audit issued April 29, 2015. Unmodified opinions, no questioned costs, FY13 Financial and Single Audit issued June 26, 2014. Unmodified opinions, $2,285 in questioned costs, FY12 Financial and Single Audit issued June 29, 2013. Unqualified opinion on financial audit, qualified opinions on CFDA, 15.875, 84.394 and 84.402, no questioned costs (MUNIS system went live during FY12) While the TPFA system is the system of record for USDOE grants, the GDOE MUNIS contains a duplicate set of books which are audited by GDOE's external auditors. The reconciliation of the Schedule of Expenditures of Federal Awards (SEFA) to the TPFA and GDOE accounts is part of the external audit. **3.E SEFA Reconciliation** 3.E.6 Business Office provides a copy of the approved report to IAO **3.F Timely Completion of GDOE's Financial and Single Audit** IAO has worked with the respective Division Heads to implement corrective action plans for deficiencies identified in the FY16 Financial Statement Audit and Management Letter. **8.B Reporting & Accountability** 8.B.1 Transition the grant status report from TPFA to GDOE financial affairs division	See FMIS-4 for updates on FMIS training and IC-5 for tasks related to SOPs. **3.E SEFA Reconciliation** 3.E.6 Business Office provides a copy of the approved report to IAO **3.F Timely Completion of GDOE's Financial and Single Audit** 3.F.2 Contract Independent Audit Services (Amendment for FY 2017) 3.F.3 Timely close accounting records (FY 2017) **8.B Reporting & Accountability** 8.B.1 Transition the grant status report from TPFA to GDOE financial affairs division

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-1, Continued.	See FMIS-4 for updates on FMIS training and IC-5 for tasks related to SOPs.	

Implementation Deliverables	Completion Risks	
IC-1: TPFA implemented the Tyler-MUNIS ERP financial management system effective December 2010. GDOE has implemented a Financial Management Information System (FMIS), which includes functionality to support all GDOE financial applications (April 2012). A credible financial management system designed and implemented to meet the EDGAR and other federal reporting requirements in terms of timeliness of funds management and reporting. Additionally, custom reports designed to capture federal grant activity.	Competing priorities may stall progress. Risk: Medium/High	

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
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Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-2: GDOE Finance and Administration must demonstrate improved communication and cooperation to develop an integrated financial management system that meets the needs of the organization.	**COMPLETED** Meetings held with project directors, accounting, budget, and human resources to discuss grant requirements for recent GANs. Regular transition plan meetings with TPFA, Federal Programs, Internal Audit, Procurement, Property Management, Financial Affairs, FMIS. Stakeholder satisfaction surveys ongoing for Human Resources, FSAIS, Procurement and Business Office.	Continue collaboration with schools and divisions to address: • Personnel and payroll issues; • Procurement, receiving, inventory, and payables issues; • Budgeting and reporting issues; • Cash receipts and account receivable issues; and • Non-Appropriated Funds. Benchmarks and stakeholder satisfaction surveys in process of adoption/development for all operational divisions.
Implementation Deliverables	**Completion Risks**	
IC-2: Department-wide subcommittee structure focused on each of the issue areas. The structure will drive collaboration, which is also necessary to support FMIS implementation which supports GDOE-wide financial management. GDOE departments working together on a daily basis to address implementation, compliance and other activities. Efforts to include direct Internal Audit support of external independent auditors in conduct of single audits as required by the Single Audit Act.	Maintaining sufficient staffing levels within the Business Office and IAO continues to be a challenge with the retention of personnel due to resignations and competitive salaries at other GovGuam agencies. Hiring Freeze affecting replacement of payables, procurement and property management staff Risk: Medium/High	
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).		Taling Taitano, DSFAS

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-3: Reliance on the credible financial management system by other Guam agencies and single auditors as accurate system of record.	**COMPLETED** • Reliance on credible financial management system by other Guam agencies PL 30-164:2, signed into law on July 16, 2010 created the Education Financial Supervisory Commission (EFSC) to monitor the financial health of the GDOE. The Commission is made up of the Directors of the Department of Administration, Bureau of Budget and Management Research, and Guam Legislature Office of Finance and Budget (OFB) or their designative representatives, the Public Auditor or her designated representative and a parent of a GDOE student; the GDOE Superintendent and Finance Deputy are ex-officio members. By law, the EFSC meets monthly to review GDOE's financial position. GDOE provides a download of its financial reports from its financial management system, initially CIMS and then, in 2012, MUNIS, to the EFSC for its review. Copies of the EFSC minutes and financial designations are located on the OFB websites, http://www.senbenp.com/EFSC.html and http://www.ofbguam.org/ • Reliance on credible financial management system by single auditors FY16 Financial and Single Audit issued May 2, 2017. Unmodified opinions, no material weaknesses, no questioned costs FY15 Financial and Single Audit issued June 6, 2016. Unmodified opinions, no material weaknesses, no questioned costs FY14 Financial and Single Audit issued April 29, 2015. Unmodified opinions, no questioned costs, FY13 Financial and Single Audit issued June 26, 2014. Unmodified opinions, $2,285 in questioned costs, FY12 Financial and Single Audit issued June 29, 2013. Unqualified opinion on financial audit, qualified opinions on CFDA, 15.875, 84.394 and 84.402, no questioned costs (MUNIS system went live during FY12) This is the fourth full fiscal year (FY16) audit on Tyler MUNIS.	Regularly reconcile GDOE's financial information with BBMR, DOA, and the TPFA to ensure information is accurate and supports the timely completion of audit. Provide EFSC GDOE reports on monthly basis. **3.F Timely Completion of GDOE's Financial and Single Audit** 3.F.2 Contract Independent Audit Services (Amendment for FY 2017) 3.F.3 Timely close accounting records (FY 2017) **3.F.6 IAO to ensure implementation of corrective action plans** Meeting held on August 23, 2017 with external auditors to discuss financial statement review and Single Audit. Follow-up meeting to be scheduled in October 2017. This will be the fifth full fiscal year (FY17) audit on Tyler MUNIS.

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-3, Continued	**3.F Timely Completion of GDOE's Financial and Single Audit** IAO has worked with the respective Division Heads to implement corrective action plans for deficiencies identified in the FY16 Financial Statement Audit and Management Letter.	
Implementation Deliverables	**Completion Risks**	
A credible financial management system whose implementation is guided by Generally Accepted Accounting Procedures (GAAP) and supported by SOPs to ensure a system of internal controls over financial reporting that can be relied upon by external independent auditors for the purpose of expressing an opinion on the financial statements. Periodic examination and documentation of internal controls by internal audit staff to ensure that the controls are operating as intended without exception.

Information management needs met by all users (e.g., custom reconciliation worksheet to support requirements and tracking of federal draw funds). | Low based on staff's time spent to identify and work out errors and deficiencies of the GASB 34 reporting module. Risk level – Low. | |
| **Schedule Based upon Performance Plan** | **New Deliverables Completed** | **Responsible Person/Department** |
| Ongoing support provided to EFSC. Work with External Auditor on Audit. | Reports submitted to ESFC, ESFC Meeting Minutes. | Taling Taitano, DSFAS Franklin Cooper-Nurse, Chief Auditor |

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-4: GDOE will develop a grant spending process that ensures that grant awards are based on specified program plans and spent on the programs in a timely manner. The grants system will be integrated with the FMIS.	**COMPLETED** The delayed approvals of the Consolidated Grant requires the judicial use of funds so that programs can continue while GDOE awaits the GAN. Federal Programs working with program managers and project directors to ensure that the FFY16 Consolidated Grant is timely expended. Monthly grant status reports, requisition and purchase order reports issued so managers can track grant balances. Budget, Accounting, Payroll and Procurement meet with Project Directors to ensure that accounts are appropriately set up, budget loaded, and any large procurement planned. GAN for FFY17 Consolidated grant issued on October 1, 2017, the earliest that Guam has received in many years.	Team is working to ensure FFY16 funds were timely expended. Workshop to roll out FFY17 Consolidated Grant scheduled for October 19&20, 2017. Team considering how to address next application as there may be a reduction in funding.

Implementation Deliverables	Completion Risks	
• Program plans will serve as the basis for application disbursement; • Grant spending process will be supported by SOPs, internal control checklists, and training for all affected personnel; • Disbursements will tie to actions specified in program plans; • Funds will be expended for allowable purposes under the statutes; and • No funds will be lost due to lapsing obligation periods. • Legal review has been added to MUNIS approval workflow to help ensure smooth procurement process.	Delay in the issuance of the GAN has delayed hiring and procurement activities. Risk level – High. The change from consolidation under Title 5 to RLIS will require some restructuring of programs. Risk level – High.	

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-4, Continued		
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
Ongoing	Monthly Grant Status Reports, Requisition and Open Purchase Order Reports	Ignacio Santos, Federal Programs Administrator

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-5: GDOE will reconstitute its Internal Audit Office (IAO) by developing an annual audit plan and hiring additional staff to conduct audit work, including the risk assessments (Management Internal Controls [MIC], Audit Assessment, and CCAP), and coordinating GDOE's external audits (OPA's performance audits and the GDOE's independent financial auditors' financial and single audits, including NAF and resolution of prior audit findings). The Chief Auditor will update the MIC. The MIC consists of GDOE school administrators and division heads' risk assessment, the IAO's own risk assessment, and conducting fieldwork to test the internal controls of identified high risk areas. Procedures and processes to ensure financial and single audit reports are issued within nine months after the end of each fiscal year as required by the Single Audit Act, as amended.	**COMPLETED** The internal audit has gone from three auditors in 2009 to six auditors and an administrative officer in November 2016. Collectively the IAO has over 30 years of direct government audit experience. All 6 audit staff have college degrees, and 2 have graduate degrees (M.B.A, M.P.A). Currently 2 members have relevant professional certifications (CGFM, CICA) and 3 other members are scheduled for certification examination in 2017. Based on audit standards, IAO will review its workflows and assess its resources to execute mandates, risk-based audits, advisories, and internal controls assessment. The new IAO is established with an approved Charter, Audit SOP's (in line with IIA, GAGAS, etc.) and their Auditor Code of Ethics. The Office has created a website, a hotline, and has completed its risk assessments. To date, IAO has completed 15 reviews, three investigations, five advisories, and six trainings. Additionally, IAO completed from June 2014 September 2017 validations of Guam Charter Schools as mandated by local law. IAO currently is completing its SOP Reviews of Sole Source Procurement, TDRs, and SEFA. FY16 Financial and Single Audit issued May 2, 2017. Unmodified opinions, no material weaknesses, no questioned costs FY15 Financial and Single Audit issued June 6, 2016. Unmodified opinions, no material weaknesses, no questioned costs FY14 Financial and Single Audit issued April 29, 2015. Unmodified opinions, no questioned costs,	**3.B Risk Assessment of GDOE** 3.B.21 Provide tool & training to Division Mgrs/Administrators 3.B.22 Require Division Mgrs/Administrators to submit MIC 3.B.23 Follow-up on non-submissions 3.B.25 Compile MIC Assessments into a database 3.B.26 Analyze results of MIC Assessment 3.B.27 Identify non-submissions and high-risk areas **3.C Develop a Three Year Audit Plan** 3.C.1 Identify IAO's resources 3.C.2 Analyze available staff hours 3.C.3 Identify the audit universe 3.C.4 Incorporate risk assessments 3.C.5 Review and research IAO's mandates 3.C.6 Incorporate CCAP, SOP, and NAF duties 3.C.7 Identify audit topics 3.C.8 Develop IAO's audit selection matrix 3.C.9 Use auditor judgement to select audit topics The IAO audit plan is updated annually. IAO will begin its next update in January 2018. **3.D Establish Internal Controls Framework (COSO)** 3.D.2 Division/Program obtain approval of SOPs 3.D.3 Division/Program to conduct training on SOPs 3.D.4 IAO to audit compliance to SOPs 3.D.5 IAO to report and recommend improvements to internal control deficiencies 3.D.6 Division/Program to amend SOPs accordingly 3.D.7 Division/Program to obtain approval on amended SOPs The last identified SOP, Grant Procedure Manual, should be completed in 2018. The Procurement and Property SOPs will be updated in this quarter and

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-5 Continued.	FY13 Financial and Single Audit issued June 26, 2014. Unmodified opinions, $2,285 in questioned costs, FY12 Financial and Single Audit issued June 29, 2013. Unqualified opinion on financial audit, qualified opinions on CFDA, 15.875, 84.394 and 84.402, no questioned costs (MUNIS system went live during FY12) FY11 Financial and Single Audit issued June 27, 2012. Unqualified opinion on financial audit, qualified opinions on Special Education and Head Start clusters, no questioned costs (Alvarez & Marsal contracted to manage USDOE grants) FY10 Financial and Single Audit issued April 6, 2011. U Unqualified opinion on financial audit, qualified opinions on Special Education Cluster, Consolidated Grant, Recover Act and Consolidated Grant, no questioned costs FY09 Financial and Single Audit issued March 31, 2010. Unqualified opinion on financial audit, qualified opinions on CFDA 84.027 and 84.336, $4,862 in questioned costs **3.F Timely Completion of GDOE's Financial and Single Audit** 3.F.6 IAO to ensure implementation of corrective action plans, FY16 **6.I SOP 200-041: School Meals Collection** 6.I.9 IAO Reporting of Testing Results; worked with responsible division to address deficiencies **6.K SOP 200-015: Fixed Asset Management for Property Management Office and Central Receiving Warehouse** 6.K.9 IAO Reporting of Testing Results; worked with responsible division to address deficiencies **6.L SOP 200-019: Fixed Asset Management for Schools and Divisions**	the annual training scheduled. Four accounting related SOPs are in the process of being amended this quarter. IAO will complete its review of three SOPs by this quarter. **3.E SEFA Reconciliation** 3.E.7 IAO periodically reviews the report to determine compliance **3.F Timely Completion of GDOE's Financial and Single Audit** 3.F.2 Contract Independent Audit Services – amendment for FY17 audit 3.F.3 Timely close of FY17 accounting records 3.F.4 Timely replies to audit requests, FY17 3.F.5 Audit report issued per contract 3.F.6 IAO to ensure implementation of corrective action plans, FY16 The Entrance Conference for GDOE's FY 17 Financial and Single Audit is to be scheduled by OPA in November 2017 with GDOE and Deloitte. GDOE's FY 17 Financial and Single Audit reports is expected to be issued in March 2018. **6.M SOP 200-018: Sole Source Procurement** 6.M.9 IAO Reporting of Testing Results **6.AE.SOP 900-020: Time Distribution Report** 6.AE.8 IAO Testing of SOP 6.AE.9 IAO Reporting of Testing Results **6.AH SOP 200-044: SEFA Reconciliation** 6.AH.8 IAO Testing of SOP 6.AH.9 IAO Reporting of Testing Results IAO has established an internal controls framework for assessment of GDOE's internal control deficiencies. IAO's assessment will utilized the Green Book COSO standards for the five control components. Assessments

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-5 Continued	6.L.9 IAO Reporting of Testing Results; worked with responsible division to address deficiencies **6.M SOP 200-018: Sole Source Procurement** 6.M.8 IAO Testing of SOP **6.AH SOP 200-044: SEFA Reconciliation** 6.AH.6 IAO Walkthrough of SOP 6.AH.7 IAO Assessment of SOP **8.B. Reporting & Accountability** 8.B.8 Management and completion of CCAP report 8.B.9 Weekly management & completion of the transition plan. IAO prepared GDOE's July to September 2017 Transition Plan for submittal to USDOE and is working with Transition Plan team to complete CCAP for quarter ended September 30.	will be formally reported in all IAO reports. Reports will make recommendations to improve internal control deficiencies. **8.B. Reporting & Accountability** 8.B.8 Management and completion of CCAP report 8.B.9 Weekly management and completion of the transition plan.

Implementation Deliverables	Completion Risks	
Updated MIC Assessment report, NAF draft reports	Success will hinge on successful staffing of the IAO. Salary inequities amongst government entities nake it difficult to recruit and retain staff. The IAO identified a net negative manpower hours vs. assigned tasks (CCAP and TPFA Transition Plan) and mandates (MIC, NAF, Charter Schools, and SOPs/Internal Controls) in its Audit Plan. Risk level – High.	

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-5 Continued		

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	Transition Plan, July to September 2017 CCAP Update, for quarter ended June 30, 2017 Guahan Academy Charter School July to September 2017 Validation Reports iLearn Academy Charter School July to September 2017 Validation Reports	Franklin Cooper-Nurse, Chief Auditor

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
IC-6: GDOE will develop reconciliation procedures to address audit finding 2013-004, reconciliation between federal expenditures and SEFA and audit finding 2013-005, reconciliation between general ledger and SEFA	**COMPLETED** **3.E SEFA Reconciliation** 3.E.6 Business Office provides a copy of the approved report to IAO **6.AH SOP 200-44 SEFA Reconciliation** 6.AH.8 IAO Testing of SOP	**3.E SEFA Reconciliation** 3.E.7 IAO periodically reviews the report to determine compliance **6.AH SOP 200-44 SEFA Reconciliation** 6.AH.2 Staff Training on SOP 6.AH.3 Staff Acknowledgement Forms 6.AH.5 Amendment to SOP Approved by Superintendent 6.AH.9 IAO Reporting of Testing Results
Implementation Deliverables	**Completion Risks**	
Standard Operating Procedures and related training. No repeat findings.	Lack of adequate staff. Risk level – Medium.	
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	SEFA Reconciliation Report	Franklin Cooper-Nurse, Chief Auditor Lourdes Perez, Comptroller

Procurement

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
P-1: GDOE will develop and implement effective procurement policies and procedures that ensure: • Delivery of ordered supply items within specified timeframes for correct type of supply from selected vendor; • Delivery of supplies and equipment, tagged and entered into a property management system, to schools within three days of receipt; and • Recording of when items are ordered, when orders arrive and are entered into the financial management system, and when they are delivered	**COMPLETED** SOP 200-015 Fixed Asset Management for Property Management Office & Central Receiving Warehouse, last update 1/10/14 SOP 200-019 Fixed Asset Management for Schools & Divisions, last update 4/1/16 SOP 200-018 Sole Source Procurement, last update 8/17/16 SOP 200-020 Open Purchase Order Monitoring & Reporting, last update 8/11/16 SOP 200-025 Procedures for Maintaining the Procurement File, last update 8/25/16 SOP 200-026 Competitive Sealed Bidding – Indefinite Quantity Bids (IQB), last update 9/28/16 SOP 200-027 Competitive Sealed Bidding – Invitation for Bids (IFB), last update 10/24/16 SOP 200-030 Emergency Procurement, last update 10/24/16 SOP 200-031 Competitive Selection Procedures for Services – Request for Proposals (RFP), last update 11/1/16 SOP 200-033 Competitive Multi-Step Sealed Bidding, last update 11/22/16 SOP 200-036 Request for Information Procedures, last update 11/25/16 SOP 200-037 Requisition Entry, last update 1/11/17 SOP 200-038 Purchase Order Change Order, last update, 2/7/17 SOP 200-040 Protest / Appeal Procedures, last update 1/26/17 **6.M SOP 200-018: Sole Source Procurement** 6.M.8 IAO Testing of SOP Purchasing, Accounts Payable and Fixed Asset systems are integrated and end users are able to monitor when orders are made, received, and are paid for through purchase order inquiry. Contract Management module activated to track key contract dates. Procurement calendar developed with end users to track key deadlines. Using contract module to assist in tracking key dates. Procurement staff work closely with legal on large procurements so deadlines meet.	**6.M SOP 200-018: Sole Source Procurement** 6.M.2 Staff Training on SOP 6.M.3 Staff Acknowledgement Forms 6.M.4 Amendment to SOP 6.M.5 Amendment to SOP Approved by Superintendent 6.M.9 IAO Reporting of Testing Results **6.N SOP 200-020: Open Purchase Order Monitoring & Reporting** 6.N.2 Staff Training on SOP 6.N.3 Staff Acknowledgement Forms 6.N.4 Amendment to SOP 6.N.5 Amendment to SOP Approved by Superintendent **6.O SOP 200-025: Procedures for Maintaining the Procurement File** 6.O.2 Staff Training on SOP 6.O.3 Staff Acknowledgement Forms 6.O.4 Amendment to SOP 6.O.5 Amendment to SOP Approved by Superintendent **6.P SOP 200-026: Competitive Sealed Bidding - IQBs** 6.P.2 Staff Training on SOP 6.P.3 Staff Acknowledgement Forms 6.P.4 Amendment to SOP 6.P.5 Amendment to SOP Approved by Superintendent **6.Q SOP 200-027: Competitive Sealed Bidding - IFBs** 6.Q.2 Staff Training on SOP 6.Q.3 Staff Acknowledgement Forms 6.Q.4 Amendment to SOP 6.Q.5 Amendment to SOP Approved by Superintendent

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
P-1, Continued .	Audit findings related to procurement in FY15 & FY16 related to guidance from USDOE related to intergovernmental agreements as well as "grant specific" procurements of curriculum materials. Procedures put in place to address these findings. Working on plan to transition requisitions processing from TPFA system to GDOE system.	**6.R SOP 200-030: Emergency Procurement** 6.R.2 Staff Training on SOP 6.R.3 Staff Acknowledgement Forms 6.R.4 Amendment to SOP 6.R.5 Amendment to SOP Approved by Superintendent **6.S SOP 200-031: Competitive Sealed Bidding - RFPs**
Implementation Deliverables	**Completion Risks**	6.S.2 Staff Training on SOP 6.S.3 Staff Acknowledgement Forms
Written policies and procedures to ensure that US ED funds are used only for allowable costs, including costs that are necessary, reasonable, and allocable to the respective grants as required by OMB Circular A-87, and that are procured in accordance with applicable procurement requirements in 34 CFR §§ 80.36(b)-(j).	Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High	6.S.4 Amendment to SOP 6.S.5 Amendment to SOP Approved by Superintendent **6.T SOP 200-033: Competitive Multi-Step Sealed Bidding** 6.T.2 Staff Training on SOP 6.T.3 Staff Acknowledgement Forms 6.T.4 Amendment to SOP 6.T.5 Amendment to SOP Approved by Superintendent **6.U SOP 200-036: Request for Information Procedures** 6.U.2 Staff Training on SOP 6.U.3 Staff Acknowledgement Forms 6.U.4 Amendment to SOP 6.U.5 Amendment to SOP Approved by Superintendent **6.V SOP 200-037: Requisition Entry** 6.V.2 Staff Training on SOP 6.V.3 Staff Acknowledgement Forms 6.V.4 Amendment to SOP 6.V.5 Amendment to SOP Approved by Superintendent **6.W SOP 200-040: Protest / Appeal Procedures** 6.W.2 Staff Training on SOP 6.W.3 Staff Acknowledgement Forms

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
P-1, Continued		6.W.4 Amendment to SOP 6.W.5 Amendment to SOP Approved by Superintendent **6.AI SOP 200-38: Purchase Order Change Order** 6.AI.2 Staff Training on SOP 6.AI.3 Staff Acknowledgement Forms 6.AI.4 Amendment to SOP 6.AI.5 Amendment to SOP Approved by Superintendent Will update SOPs to ensure that "required by" and "expiration" dates are provided by SOP Developing plan to transition requisitions processing from TPFA system to GDOE system. GDOE waiting for official response from USDOE regarding findings.
Schedule Based upon Performance Plan	**New Deliverables Completed This Quarter**	**Responsible Person/Department**
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).		Carmen T. Charfauros, Supply Management Administrator

Procurement

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
P-2: Implement reporting system that will track requisitions and open Purchase Orders. The system will reflect when items are ordered, when orders arrive and are logged into the system, and when they are delivered to the proper location.	**COMPLETED** GDOE Buyer Supervisors issue to end users a) Requisitions in Progress Reports weekly and b) Open Purchase Order Reports monthly from the TPFA (USDOE funded) and GDOE systems. Tyler MUNIS Purchase Order Inquiry allows end users to track status of purchase, e.g., order date, received date. MUNIS also allows end users to scan packing lists and receiving reports into system and access such reports as needed. Procurement calendar developed with end users to track key deadlines. **4.D Reporting & Accountability** 4.D.2 Create a detailed district-wide procurement calendar 4.D.6 Transition the creation of the open requisition and open PO report from TPFA to the GDOE (federal). As fiscal year comes to an end, deadlines are set to ensure sufficient time to encumber available balances: • Friday, September 29, 2017 for small purchase of goods for USDOE $150,000 and below.	**4.D Reporting & Accountability** 4.D.2 Create a detailed district-wide procurement calendar 4.D.6 Transition the creation of the open requisition and open PO report from TPFA to the GDOE (federal) Continue regular issuance of reports to End Users. Review work load of buyers to ensure equitable distribution of work. Review work flows to eliminate any redundancies or unnecessary reviews.
Implementation Deliverables	**Completion Risks**	
Monthly summary of completed purchases and procurement actions; Established process for routine review of federally funded requisitions and purchase orders.	Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High	

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
P-2, Continued Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	Requisition in Progress reports generated weekly, Procurement Calendar & Open Purchase Order reports generated monthly.	Carmen T. Charfauros - Supply Management Administrator

Procurement

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
P-3: Improve departmental procurement processes beyond those responsibilities directly related to the modules of the Financial Management Information System (FMIS).	**COMPLETED** GDOE has hired additional staff to ensure requisitions are processed timely. One Buyer Supervisor and two Buyers address USDOE funded purchases. One Buyer Supervisor and two Buyers handle non-USDOE funded purchases. One additional buyer is in the process of being recruited and two personnel are shared with Property Management to assist during Procurement's high volume period, i.e., June through November. Meetings held with various grant project directors upon receipt of Grant Award Notice to discuss major procurements included in grant application. Regular meetings held with project directors and division heads to discuss ongoing procurement status. Surveys to end users and vendors available on line and at procurement website. Results reviewed with staff to address concerns. **4.A Procurement Office** 4.A.25 Determine the need for a Contract Management Administrator. Board included contract manager in FY18 Budget submittal to Guam Legislature.	Year-end procurement training to be scheduled. Procurement will also speak at the Consolidated Grant workshop. Meetings held with various grant project directors upon receipt of Grant Award Notice to discuss major procurements included in grant application. Meetings held every month with project directors and division heads to discuss ongoing procurement status. Surveys to end users and vendors available on line and at procurement window. Results reviewed with staff to address concerns. GCC has been contacted to determine if additional refresher Procurement Training is being scheduled. Buyers have been scheduled to retake GCC procurement modules as necessary. Position description for contract manager to be developed.
Implementation Deliverables	**Completion Risks**	
Development and publication of procurement policies and procedures, and external verification of compliance with SOPs.	Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High.	

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
P-3, Continued Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).	Procurement surveys. Meetings with End Users .	Carmen T. Charfauros - Supply Management Administrator

Property Management

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-1: GDOE will develop and implement effective property management policies and procedures that ensure compliance with Federal regulations, to include tagging and tracking of inventory and prompt delivery of property purchased with federal funds to the appropriate location, so that items may be used for the purpose for which they were purchased.	**COMPLETED** • SOP 200-015 Fixed Asset Management for Property Management Office & Central Receiving Warehouse, last update 1/10/14 • SOP 200-019 Fixed Asset Management for Schools & Divisions, last update 4/1/16 • Inventory Report, 7/24/17 • No Equipment and Real Property Management Audit Findings in FY14, FY15 and FY16 Single Audits • Program Coordinator III was placed in charge of Property Management Office and Receiving Warehouse to focus on addressing issues regarding property management. Property Management Office has replaced all staff in place in 2009 and has grown from four staff to nine in 2016. **5.A Tagging of USDOE-funded assets.** 5.A.2 Ensure Fixed Asset Records include an identifiable funding source. With all *newly received* assets, PMO staff are including an identifiable funding source in the creation of new fixed asset records in MUNIS. The information includes Grant Name, Federal Award Identification (FAIN) Number, and the Catalog of Federal Domestic Assistance (CFDA) Number. SOP 200-037 Requisition Entry, updated 1/11/17 to require this information on requisitions; fixed assets updated through purchase order system will automatically include this information. Staff are similarly updating Existing Fixed Asset records. This process is ongoing. **Target 10/30/2017.** **5.B Annual Physical Inventory** Physical inventory began January 9, 2017 and was completed on May 12, 2017 5.B.3 Manage the current year inventory audit project (including team leadership assignments, team selections, logistics, BMI scanner and audit material preparation. Preparation for CY18 physical inventory has begun.	**5.A – Tagging of USDOE-funded assets.** 5.A.2 Ensure Fixed Asset Records include an identifiable funding source. With all *newly received* assets, PMO staff are including an identifiable funding source in the creation of new fixed asset records in MUNIS. The information includes Grant Name, Federal Award Identification (FAIN) Number, and the Catalog of Federal Domestic Assistance (CFDA) Number. SOP 200-037 Requisition Entry, updated 1/11/17 requires end users to include this information on requisitions. Working to include this information on all historical records. **Target date 10/30/2017.** 5.A.**7** Internal record management. **Target date 10/31/17** **5.B Annual Physical Inventory** 5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. **5.C Staff training on BMI software, MUNIS fixed asset module, computer skills.** Training sessions to continue throughout the quarter. 5.C.1 PMO will provide ongoing training of BMI software, MUNIS fixed asset module and computer skills as they relate to inventory management 5.C.2 PMO staff will demonstrate mastery of using BMI software, MUNIS, and have basic to intermediate computer skills. 5.C.3 PMO staff will understand Microsoft Excel spreadsheet creation and analysis. 5.C.4 PMO staff will demonstrate mastery of using computer software to provide internal training. 5.C.5 PMO staff will be proactive in addressing and correcting any training concerns among staff.

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-1, continued	5.B.6 Manage the current year post-audit evaluation process to emphasize the inventory management accountability of fixed assets and procedures at each school and division. 5.B.8 Generate the current year status reports for dissemination to USDOE and GDOE Upper Management. 5.B.10 GDOE PMO staff will conduct the current year reconciliation of USDOE funded fixed assets. 5.B.11 GDOE PMO staff will conduct the one-on-one evaluations after the completion of each site's inventory audit. 5.B.12 GDOE PMO will conduct and monitor the progress of the required follow-up actions of each site. GDOE PMO will conduct and monitor the progress of the required follow-up actions of each site. **6.K / 6.L SOPs 200-015 & 200-019 Fixed Asset Management** 6.K.9 & 6.L.9 – IAO Reporting of Testing Results; working with IAO to resolve deficiencies	**5.E – Receiving assets (warehouse & schools)** 5.E.4 – Fill the Warehouse Supervisor position. FY18 Budget Hearings will be scheduled in May/June 2017. Working on identifying alternate funding. **6.K SOP 200-015: Fixed Asset Management for Property Management Office & Central Receiving Warehouse** 6.K.2 Staff Training on SOP 6.K.3 Staff Acknowledgement Forms 6.K.4 Amendment to SOP 6.K.5 Amendment to SOP Approved by Superintendent **6.L SOP 200-019: Fixed Asset Management for Schools & Divisions** 6.L.2 Staff Training on SOP 6.L.3 Staff Acknowledgement Forms 6.L.4 Amendment to SOP 6.L.5 Amendment to SOP Approved by Superintendent
Implementation Deliverables	**Completion Risks**	
Replace all local DOE property tags with type and make identical to those currently in use by TPFA for federally purchased assets; result is the removal of probable convergence of numbers in MUNIS system. Written Property Management SOPs. Comprehensive physical inventory resulting in detailed fixed asset ledger and ability to perform depreciation expense accurately and efficiently.	Recruitment for PMO vacancy due to hiring freeze. Risk level – High. New warehouse space being constructed. Risk level – Medium to High	

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-1, continued		

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
Activity in the "Status Report as of 9/30/17" Section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (October 1, 2016 thru December 31, 2016).	Inventory Report completed 7/24/17	Marc Pido - Program Coordinator III

Property Management

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-2: GDOE's inventory policy will include an established procedure for replacement or reimbursement of any items in the inventory that cannot be located, consistent with federal regulations.	**5.D Standard Operating Procedures** SOP# 200-015 & 200-019 6.K.9 & 6.L.9 IAO Reporting of Testing Results; working with IAO to address deficiencies.	**5.D Standard Operating Procedures** 5.D.2 PMO will continuously update SOP. Property Management will collaborate with Accounting, FSAIS, C&II and Federal Programs to further develop and unify policies and procedures relating to determining responsibility and financial liability for property that is lost, damaged, destroyed or stolen. (this item is not on transition plan) **Target 11/20/2017.**
Implementation Deliverables	**Completion Risks**	
Written lost and stolen item policy which would serve as the basis for any reimbursement. Training programs for principals, assistant principals, and administrative personnel at the school level to increase awareness and ownership of the policies and improve safeguarding of assets.	Recruitment for PMO vacancy due to hiring freeze. Risk level – High. New warehouse space being constructed. Risk level – Medium to High	Reviewing current documents related to technology to ensure standard across GDOE. Will consider expanding to other assets. **6.K SOP 200-015: Fixed Asset Management for Property Management Office & Central Receiving Warehouse** 6.K.2 Staff Training on SOP 6.K.3 Staff Acknowledgement Forms 6.K.4 Amendment to SOP 6.K.5 Amendment to SOP Approved by Superintendent **6.L SOP 200-019: Fixed Asset Management for Schools & Divisions** 6.L.2 Staff Training on SOP 6.L.3 Staff Acknowledgement Forms 6.L.4 Amendment to SOP 6.L.5 Amendment to SOP Approved by Superintendent

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
PM-2, continued Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).		Marc Pido - Program Coordinator III

Property Management

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-3: The inventory policy and management system will ensure that Property Management, Procurement, Finance and Administration, Schools and School Administration act as an integrated team on procurement issues.	**COMPLETED** Tyler MUNIS is an integrated financial management system with general ledger, fixed assets, purchasing, and payables functions. Once Procurement converts a requisition in MUNIS to a Purchase Order, the Property Management Office, along with the vendor and the end user, are notified of the Purchase Order. The Property Management Office begins communications with the end user for distribution instructions for the impending order and with the vendor for the impending delivery. Schools/divisions are notified of the impending PO delivery. Once the order is received by the Receiving Warehouse, tagged and recorded in MUNIS by the Property Management Office, the assets are delivered in a prompt fashion. IT equipment are delivered same day as received by Receiving Warehouse. All other equipment are delivered to the end user within three (3) business days. Once delivery to end user is made, receiving report is produced in MUNIS which completes Three Way Match in order for Accounts Payable to process the payment for the vendor invoice. An accountant has been hired to be responsible for reconciling the fixed assets recorded in the general ledger with the fixed asset inventory system. The Property Management Officers work with Fixed Asset Liaisons in schools and divisions on the annual inventory to include resolution of any missing assets. **5.B – Annual Physical Inventory** 5.B.3 Manage the current SY16-17 inventory audit project (including team leadership assignments, team selections, logistics, BMI scanner and audit material preparation). Inventory ongoing with GDOE staff taking lead. (Planning & training for CY2018 inventory).	**5.B – Annual Physical Inventory** 5.B.6 Manage the post-audit SY16-17 evaluation process to emphasize the inventory management accountability of fixed assets and procedures at each school and division. 5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. FY18 Budget Hearing scheduled in May/June timeframe. **Target moved to 10/30/2017.** 5.B.14 PMO and RW staff have proper GDOE-issued office space to efficiently and effectively carry out their responsibilities and duties. Attorney General did not approve lease amendment that would have provided existing warehouse for PMO use. New warehouse construction is currently being planned on Tiyan site. **Target moved to 3/31/2018.** Property management recruitment efforts in place to fill Property Control vacancy of Morina Naputi.

Implementation Deliverables	Completion Risks	
PM-3, Continued Inventory policies adopted by GDOE will reflect coordination and review of established policies from GDOE Property Management and Procurement.	Recruitment for PMO vacancy due to hiring freeze. Risk level – High. New warehouse space being constructed. Risk level – Medium to High	
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
Activity in the "Status Report as of 9/30/17" section reflects transition objectives / milestones that were completed or were in process during this CCAP quarter. Detail and commentary listed in the "Next Steps / Comment section" reflects objective / milestones listed in the Transition Plan that are planned to be worked on and completed in the subsequent CCAP quarter (August 1, 2017 thru December 31, 2017).		Marc Pido - Program Coordinator III Lourdes Perez – Comptroller

Property Management

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-4: GDOE will ensure that US ED is reimbursed, as appropriate and consistent with federal regulations, when equipment damage results from inappropriate use.	Guidance sought from US ED during their visit in July 2014. The GDOE recommended implementing activities to resolve PM-2 is more appropriate to achieving grant objectives than reimbursing US ED. Awaiting response.	
Implementation Deliverables	**Completion Risks**	
Additional training to ensure front line leadership (i.e., principals and other administrators) is aware of and responsible for supporting Property Management policies and procedures as well as for the proper level of oversight related to the management of property purchased with federal funds.	Awaiting guidance from USDOE	
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
See comments above		Marc Pido - Program Coordinator III

Property Management

Required Actions and Activities	Status Report as of 9/30/17	Next Steps / Comments
PM-5: Corrective Action pursuant to Finding No. 10-02 contained in the program determination letter (PDL) from the Office of Special Education regarding Audit Control Number 09-10-110764 for the Audit Period October 1, 2009 - September 30, 2010. Finding has been closed; request deletion of PM-5. Components of this section are included in PM-1 through PM-3.	**COMPLETED.** Finding No. 10-02 has been closed.	**COMPLETED.** No further steps.
Implementation Deliverables	**Completion Risks**	
Per Finding No. 10-02: • Evidence that GDOE has a uniform definition of "fixed assets" that is utilized consistently across GDOE central office managers and school sites; • Evidence that GDOE has developed enforcement actions that are reasonably designed to enforce established procedures and address noncompliance identified at the school or division level; • Evidence that it has performed the reconciliation of fixed asset data as between the property management and financial management systems; and • Further examples of documents and records used in the property management process, including fixed assets reports generated from the automated fixed assets system, that contain all details required for accurate management of the property, including, but not limited to, acquisition date, acquisition cost, and the source of funds used to acquire the property.	System Risk – Delayed implementation of the new FMIS and its processes will impact the verification, monitoring and reporting capabilities. Risk level – Low. Adaptation Risk – Speed with which all users adapt to the new system, associated technology and processes will impact efficacy of the new FMIS. Risk level – Low. Technology being introduced to Receiving Warehouse where users will require training. Manpower issues being addressed. Risk level – Low.	
Schedule Based upon Performance Plan	**New Deliverables Completed**	**Responsible Person/Department**
See comments above		Marc Pido - Program Coordinator III