

Guam Department of Education

Comprehensive Corrective Action Plan Quarterly Progress Report

For the Period Beginning July 1, 2018 and September 30, 2018

Presented to the U.S. Department of Education in Fulfillment of the Federal Fiscal Year 2018 Specific Conditions

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Contents

Reports and Report Format..... 4

Executive Summary 4

Completion Risk Key..... 5

Employee Time Tracking..... 6

Financial Management Information System (FMIS) 9

Intergovernmental Agency Arrangements..... 17

Internal Controls and Procedures..... 18

Procurement 29

Property Management..... 35

Reports and Report Format

As stated in the approved Comprehensive Corrective Action Plan (CCAP), the Specific Conditions, aka Special Conditions, require Guam Department of Education (GDOE) to provide quarterly reports to the United States Department of Education (US-Ed) on GDOE's progress in implementing measures required under the CCAP. While the Specific 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

The Third Party Fiduciary Agent (TPFA) requires bi-weekly time certifications as part of the payroll reimbursement procedures. GDOE developed automated time certification documents to support this requirement. The Federal Programs Division proposed revisions to the Standard Operating Procedures (SOP) for Personnel Time Certification inclusive of Time and Effort Certification and Time Distribution Report (TDR). Feedback has been received by stakeholders and procedures are being finalized. The certifications reflect quarterly requirements for Consolidated Grant Projects and entail a four way review which includes the Federal roster, Federal staffing pattern, labor cost, and attendance log. Special Education provides time certifications and updates to its employee roster on a bi-weekly basis. Designated GDOE staff are working alongside the TPFA and meet weekly in order to begin the transfer of TPFA procedures related to payroll review and reimbursement; a work flow and training manual is in draft form and should be finalized shortly.

Required actions and activities related to GDOE Financial Management Information System (FMIS) are completed. Tasks related to optimizing use of the FMIS are ongoing. Preparation for the next MUNIS update is ongoing. Work with the accounting staff to automate monthly reports and clean out inactive accounts continues.

Guidance from US-Ed Grant Program Office and General Counsel previously clarified that Intergovernmental Agency Agreements are unallowable activities under the Consolidated Grant. No other tasks are required with regard to the Intergovernmental Agency Agreements Section and GDOE is considering these tasks complete.

Internal Controls and Procedures required actions and activities are completed. The corrective action plan to address FY17 audit findings and management letter comments is ongoing; auditor recommends TPFA report on an accrual basis to reduce reconciliation effort. Work on the FY18 audit has begun. Reviews, needed updates and training on SOPs continue and are regularly scheduled.

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 coordinators and division heads. Monthly reports on requisitions not in work flow has been developed and distributed to end users to ensure timely processing. Vendor evaluations have been included in ongoing procurements.

Most of the Property Management required actions and activities are complete. The School Year (SY) 17-18 Fixed Asset Inventory report is being finalized. Preparations for the SY18-19 Fixed Asset Inventory has begun. Request for funding for a warehouse supervisor and a contract manager (program coordinator) were included in the FY19 budget request. Recruitment of vacant Property Control Officers (PCO) and Buyer on hold due to hiring freeze.

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 9/30/18	Next Steps / Comments
<p>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.</p> <p>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.</p> <p>ETT-3: Research and implement an automated time collection system for federally funded employees.</p>	<p>EET-1 & ETT-2 COMPLETED</p> <p>The TPFA continues to require biweekly certifications for all US-Ed grant funded personnel. Christine Rosario (GDOE) has been working alongside Tony Bobb (TPFA) on the payroll reconciliation process; weekly meetings are scheduled to review any unreconciled items. Regular meetings with the project managers and federal programs have been scheduled to address any concerns. The team has been working diligently to clear all outstanding unreconciled items.</p> <p>GDOE developed an automated time certification report through MUNIS. Project coordinators are able to print the after the fact time certification reports on demand and choose the project and time period needed. It was agreed that employee signatures are not necessary as long as a supervisor with first-hand knowledge of the work performed by the employee signs the certifications. Federal programs has opted not to sign off on the certification reports for the various projects.</p> <p>The Employee Job Salary Report is available from the Budget Office to be used by the project personnel to facilitate the establishment of salary and benefit accounts for the new grant cycle. This document can also be used to build the Federal Roster. This report includes Active and In-Active employees.</p> <p>PULSE can also be used to print a list of personnel currently charged to a specific project. Additionally, the bi-weekly labor distribution reports are provided to Federal Programs staff, Program Managers and project leads.</p> <p>Federal Programs compiles the roster for the Consolidated Grant funded employees quarterly. Special Education compiles the roster for SPED funded employees on a biweekly basis.</p>	<p>TPFA may eventually consider moving bi-weekly certifications to quarterly certifications if significant improvement continues in obtaining complete and accurate personnel certifications.</p> <p>Christine Rosario working with TPFA to finalize work flow and training manual for the payroll reimbursement process.</p> <p>The Personnel Allocation SOP will be updated to include all federally funded personnel.</p> <p>The Federal Programs Division will be reviewing compliance related to US-Ed grant funded employee time tracking at least quarterly.</p> <p>GDOE will continue discussions with MUNIS to expand automated time keeping.</p> <p>During the October 12 Consolidated Grant Workshop, presentations on the Attendance Log and the quarterly submissions of the Time and Effort reports were made.</p> <p>Certain staff in Federal Programs may be split funded between Consolidated Grant and Striving Readers.</p>

<p>ETT-1 to ETT-3, Continued</p>	<p>Consolidated Grant Staff have been reassigned so that salaries are 100% charged against a single grant.</p> <p>The Federal Programs Division has proposed revisions to the Personnel Time Certification and Time Distribution Report SOP to include daily Attendance Logs for GDOE personnel. The revised SOP has been provided to the Superintendent for review and approval. Guidance on related process has been issued under signature of the Federal Programs Administrator and submitted to the US-Ed Program Office.</p> <p>Quarterly updates on the Consolidated Grant, which include personnel costs, are provided to the US-Ed program office.</p> <p>ETT-3 The GDOE FMIS, MUNIS, contains a payroll module that is used to process both local and federally funded payroll. MUNIS is able to integrate with automatic timekeeping systems.</p>	
<p>Implementation Deliverables</p>	<p>Completion Risks</p>	
<p>Written and approved SOPs, including training for applicable GDOE personnel, to ensure:</p> <ul style="list-style-type: none"> • 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 2 CFR Part 200 Subpart E; and 	<p>Federal program staff balancing competing priorities causing delays in completion. Risk Level – High.</p> <p>Consensus with other Federally Funded grants managers. Risk Level – High.</p>	

<ul style="list-style-type: none"> • 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). 		
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
<p>ETT-1 to ETT-3, Continued</p> <p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • TPFA payroll reconciliation reports • Labor distribution reports • Automated time certification report • Quarterly update to US-Ed 	<p>Ignacio Santos, Federal Programs Administrator Taling Taitano, Deputy Superintendent</p>

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED General ledger and procurement modules went live in April 2012. Human resource and payroll modules went live in August 2012.</p> <p>Note FY13, FY14, FY15, FY16 and FY17 audits were conducted on the GDOE MUNIS system; the FY12 audit was conducted on MUNIS and CIMS, GDOE's former FMIS.</p>	<p>COMPLETED No further steps necessary.</p>
Implementation Deliverables	Completion Risks	
<p>Detail system design specifications approved by GDOE Finance and Administration management.</p>		
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
<p>Completed</p>		<p>Taling Taitano, Deputy Superintendent</p>

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED To prepare for the next upgrade, TylerCM attachments were updated to save in the TCM server. Existing MUNIS users were migrated to the new GDOE domain. The steps to update the SSRS menu to be on SSRS BASE URL were completed.</p> <p>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 Financial, Student &. Administrative Information. Systems (FSAIS) or FMIS staff are unable to resolve system issues, Tyler MUNIS help desk is contacted.</p> <p>GDOE teams have been to the annual Tyler MUNIS Connect Conference three times since the system installation in 2012. The team continues to look for opportunities to use system tools to make work more efficient.</p> <p>FMIS worked with Payroll Section to reconcile reports related to payroll vendors and worked with Human Resources on further corrections to the staffing pattern report.</p> <p>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</p>	<p>2.M ESS (Employee Self-Serve) Leave Request Follow up on requested quote from Tyler MUNIS to allow attachments in ESS</p> <p>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</p> <p>Updated the SSRS Menu. Schedule testing for v11.3 for week of November 5th. GDOE anticipates moving to v11.3 before the new year.</p> <p>Request quotes from Tyler to review existing modules to ensure GDOE optimizing use.</p> <p>Initiate discussions on data transfer from TPFA to GDOE system.</p>
Implementation Deliverables	Completion Risk	
<p>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.</p>	<p>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.</p>	

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>FMIS-2 Continued:</p> <p>Sufficient qualified and trained accounting staff to manage all financial processing and reporting required by GDOE.</p>		
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>		<p>Jacqueline Mesa, Management Analyst IV</p>

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>Ongoing until condition removed by US-Ed.</p> <p>TPFA continues to manage all US-Ed federal grant funds using an independent MUNIS system and separate bank accounts.</p> <p>2.S FMIS Transition - Ongoing 8.A Accounts Payable - Ongoing 8.B Reporting & Accountability – Ongoing 8.C. Accounting / GL - Ongoing</p> <p>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.</p> <p>TPFA has trained budget staff on uploads of US-Ed grant budgets into TPFA system. Budget modifications are entered by TPFA. GDOE Accounting staff issues monthly grant status report.</p> <p>GDOE staff updates GDOE system based on receipt and retirements of fixed assets and provides supporting documentation to TPFA to be used to update the TPFA system.</p> <p>Travel, prepayments and payroll are processed by GDOE on its MUNIS system. TPFA reimburses GDOE after validating documentation provided.</p> <p>Automated time distribution reports can be printed on demand for after the fact validation. GDOE staff performs the 3-way match which is then reconciled against TPFA analysis for payroll reimbursement. Draft procedures being reviewed for finalization.</p> <p>Working with TPFA to eliminate delays in reimbursements.</p>	<p>Continued operation of the TPFA independent financial management system and bank accounts will continue.</p> <p>GDOE and TPFA are looking into areas to transfer responsibilities to GDOE.</p> <p>8.B Reporting & Accountability 8.B.2 & 8.B.10 Draft liquidation SOP to be included in Federal Grants Module being developed by Federal Programs; completion date targeted for December 2018</p> <p>Work with TPFA to improve reconciliation process between GDOE and TPFA records to address FY17 Management Letter comment regarding the time it takes to reconcile GDOE records to the TPFA records.</p> <p>Plan for migration of historical data on TPFA system to GDOE system upon TPFA exit. The FSAIS Division will take the lead on this effort.</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>FMIS-3, Continued.</p>	<p>Meetings with TPFA as needed are held to coordinate activities and resolve any concerns. TPFA supporting audit by providing details as requested by auditors.</p> <p>Met with US-Ed to preliminarily discuss the transition in roles from TPFA to GDOE.</p>	
Implementation Deliverables	Completion Risks	
<p>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.</p>		
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
<p>Activity in the "Status Report as of 9/30/18" 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, 2018 thru December 31, 2018).</p>	<p>Routine</p> <ul style="list-style-type: none"> • Requisition in Progress Reports – Weekly • Open Purchase Order Reports – Monthly • Grant Status Report – Monthly • Download from GDOE Fixed Assets Module • Payroll reimbursement reconciliation reports 	<p>Taling Taitano, Deputy Superintendent</p>

Financial Management Information System (FMIS)

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED End user training occurring at least annually. Review of SOPs and related updates occurring at least every two years.</p> <p>6.D SOP 200-022: Bank Reconciliation Procedures 6.D.2 Staff Training on SOP 6.D.3 Staff Acknowledgement Forms A review of the SOP determined that updates were not needed.</p> <p>6.E SOP 200-028: General Ledger Policy & Procedures 6.E.2 Staff Training on SOP 6.E.3 Staff Acknowledgement Forms</p> <p>6.J SOP 200-042: Revenue Control & Management Policy 6.J.2 Staff Training on SOP 6.J.3 Staff Acknowledgement Forms 6.J.4 Amendment to SOP 6.J.5 Amendment to SOP Approved by Superintendent</p> <p>6.S SOP 200-031: Competitive Sealed Bidding - RFPs 6.S.5 Amendment to SOP Approved by Superintendent</p> <p>6.AE SOP 900-020: Personnel Allocation / TDR and Reimbursement 6. AE.4 Amendment to SOP. Proposed revisions under review.</p> <p>Reminders and updates on SOPs are provided to School Administrators during their monthly sessions or at targeted training sessions. School support staff meet at least once annually to discuss specific SOPs.</p> <p>Note that several SOPs were taken off the transition plan for targeted review. These SOPs continue to be updated and end users are trained on them at least annually. These include:</p>	<p>Continuous MUNIS End User Training Related Activity</p> <ul style="list-style-type: none"> • Training during and around 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. <p>6.B SOP 200-017: Month End & Year End Closing Policy 6.B.4 Amendment to SOP 6.B.5 Amendment to SOP Approved by Superintendent</p> <p>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</p> <p>6.H SOP 200-039: Federal Grants Accounts Receivable 6.H.2 Staff Training on SOP 6.H.3 Staff Acknowledgement Forms 6.H.4 Amendment to SOP 6.H.5 Amendment to SOP Approved by Superintendent</p> <p>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</p> <p>6.L SOP 200-019: Fixed Asset Management for Schools & Divisions</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>FMIS-4, Continued</p>	<p>SOP 200-012 School Breakfast and Lunch Cash Collection SOP 200-023 Budget Preparation Process Local Appropriation SOP 200-024 Budget Entry Process SOP 200-029 Local Mileage Reimbursements SOP 200-036 Request for Information Procedures SOP 200-037 Requisition Entry SOP 200-038 Purchase Order Change Order SOP 200-040 Protest / Appeal Procedures SOP 200-041 School Meals Collection SOP 800-006 Request to Fill Position(s) for Recruitment SOP 800-007 Employee Name Change Request SOP 800-008 Transfer and Voluntary Demotion SOP 800-009 Reclassification of Teachers SOP 800-010 Salary Increments and Detailed Differential Pay SOP 1500-006 Payroll Processing</p>	<p>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</p> <p>6.M SOP 200-018: Sole Source Procurement 6.M.2 Staff Training on SOP 6.M.3 Staff Acknowledgement Forms</p> <p>6.N SOP 200-020: Open Purchase Order Monitoring & Reporting 6.N.2 Staff Training on SOP 6.N.3 Staff Acknowledgement Forms</p> <p>6.O SOP 200-025: Procedures for Maintaining the Procurement File 6.O.2 Staff Training on SOP 6.O.3 Staff Acknowledgement Forms</p> <p>6.P SOP 200-026: Competitive Sealed Bidding - IQBs 6.P.2 Staff Training on SOP 6.P.3 Staff Acknowledgement Forms</p> <p>6.Q SOP 200-027: Competitive Sealed Bidding - IFBs 6.Q.2 Staff Training on SOP 6.Q.3 Staff Acknowledgement Forms</p> <p>6.R SOP 200-030: Emergency Procurement 6.R.2 Staff Training on SOP 6.R.3 Staff Acknowledgement Forms</p> <p>6.S SOP 200-031: Competitive Sealed Bidding - RFPs 6.S.2 Staff Training on SOP 6.S.3 Staff Acknowledgement Forms</p> <p>6.T SOP 200-033: Competitive Multi-Step Sealed Bidding 6.T.2 Staff Training on SOP</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
FMIS-4, Continued		6.T.3 Staff Acknowledgement Forms 6.T.5 Amendment to SOP Approved by Superintendent
Implementation Deliverables	Completion Risks	
Establish End User Training Updated or new SOPs	Continued Training – Low SOP Update – Medium to High	6.AE SOP 900-020: Personnel Allocation/TDR and Reimbursement 6.AE.4 Amendment to SOP 6.AE.5 Amendment to SOP Approved by Superintendent 6.AF Grant Procedures Manual 6.AF.4 Amendment to SOP 6.AF.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.4 Amendment to SOP 6.AH.5 Amendment to SOP Approved by Superintendent Consolidated Grant workshop in October covered procedures related to Attendance Logs and Quarterly Certifications.
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).	<ul style="list-style-type: none"> • Amendment to SOP Submitted and Approved: SOP 200-042: Revenue Control and Management Policy • Amendment to SOP Approved SOP 200-031: Competitive Selection Procedures for Services – RFPs • Staff Training on SOPs & Staff Acknowledgement Forms: SOP 200-022: Bank Reconciliation Procedures SOP 200-028: General Ledger Policy and Procedures SOP 200-042: Revenue Control and Management Policy 	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

Intergovernmental Agency Arrangements

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>Intergovernmental Agency Procedure-1 Guidance from the US-Ed Program Office and General Counsel clarified Intergovernmental Agency agreements are unallowable activities under the Consolidated Grant.</p>	<p>COMPLETED Per Federal Programs Administrator, this item should be closed. See May 28, 2016 email from Christine Jackson, <i>US-Ed Response to GDOE Single Audit Finding Inquiry</i></p>	<p>Based on Guidance provided by US-Ed Program Office and General Counsel, the Federal Programs Division shall include within the respective Project Application, specific activities / services and ensure fair and competitive procurement practices are adhered to.</p>
<p>Implementation Deliverables</p>	<p>Completion Risks</p>	
<p>Written Guidance provided by US-Ed.</p>	<p>Adaptation Risk – acceptance by which services are identified within the program application and subsequently approved within the Consolidated Grant Application by US-Ed. Risk level – Low.</p>	
<p>Schedule Based upon Performance Plan</p>	<p>New Deliverables Completed</p>	<p>Responsible Person/Department</p>
<p>To be finalized upon submission of respective Consolidated Grant Application and approved by US-Ed's Program Office.</p>		<p>Ignacio Santos, Federal Programs Administrator</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p> <p>Additionally, the financial management system will record and account for all draws and expenditures of federal education funds</p>	<p>COMPLETED. FY17 Financial and Single Audit issued June 25, 2018. Unmodified opinions, no material weaknesses, \$32,260 in questioned costs 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)</p> <p>While the TPFA system is the system of record for US-Ed 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.</p> <p>TPFA authorizes drawdowns and GDOE staff draws funds based on that authorization. Funds go directly to TPFA through electronic deposit.</p> <p>Payments of invoices related to US-Ed grants are processed by the TPFA with support from a GDOE accounts payable clerk. GDOE processes travel, prepayments and payroll on its system which is reimbursed by the TPFA upon validation of documentation.</p> <p>3.E SEFA Reconciliation 3.E.6 Business Office provides a copy of the approved report to IAO</p>	<p>See FMIS-4 for updates on FMIS training & SOP tasks and IC-5 for tasks related to SOPs.</p> <p>3.E SEFA Reconciliation 3.E.6 Business Office provides a copy of the approved report to IAO</p> <p>Work with TPFA to improve efficiencies related to reconciliation between GDOE & TPFA records. External auditor recommends TPFA report on an accrual basis.</p> <p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.3 Timely close accounting records (FY18) 3.F.4 Timely replies to audit requests (FY18) 3.F.6 IAO to ensure implementation of corrective action plans (FY17)</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>IC-1, Continued.</p>	<p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.2 Contract Independent Audit Services (FY18) – engagement letter signed 3.F.4 Timely replies to audit requests (FY18) 3.F.6 IAO to ensure implementation of corrective action plans (FY17)</p> <p>8.B Reporting & Accountability 8.B.1 Transition the grant status report from TPFA to GDOE financial affairs division</p> <p>See FMIS-4 for updates on FMIS training & SOP tasks and IC-5 for tasks related to SOPs.</p>	
Implementation Deliverables	Completion Risks	
<p>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).</p> <p>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.</p>	<p>Competing priorities may stall progress.</p> <p>Risk: Medium/High</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<p>See FMIS-4 for updates on FMIS training & SOP tasks and IC-5 for tasks related to SOPs.</p> <ul style="list-style-type: none"> • Monthly Grant Status Reports • Monthly SEFA Reconciliations 	<p>Taling Taitano, DSFAS Jacqueline Mesa, FMIS</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED Meetings held with project directors, accounting, budget, and human resources to discuss grant requirements for recent GANs.</p> <p>Regular transition plan meetings with TPFA, Federal Programs, Internal Audit, Procurement, Property Management, Financial Affairs, FMIS.</p> <p>Stakeholder satisfaction surveys collected for Human Resources, FSAIS, Procurement and Business Office.</p>	<p>Continue collaboration with schools and divisions to address:</p> <ul style="list-style-type: none"> • Personnel and payroll issues; • Procurement, receiving, inventory, and payables issues; • Budgeting and reporting issues; • Cash receipts and account receivable issues; and • Non-Appropriated Funds. <p>Benchmarks and stakeholder satisfaction surveys in process of adoption/development for all operational divisions.</p>
Implementation Deliverables	Completion Risks	
<p>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.</p>	<p>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</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Stakeholder surveys • Biweekly Transition plan updates 	<p>Taling Taitano, DSFAS</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>IC-3: Reliance on the credible financial management system by other Guam agencies and single auditors as accurate system of record.</p>	<p>COMPLETED</p> <ul style="list-style-type: none"> 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 consists of the Directors of the Department of Administration (DOA), Bureau of Budget and Management Research (BBMR), 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 MUNIS in 2012, to the EFSC for its review. Copies of the EFSC minutes and financial designations are found on the OFB websites: http://www.senbenp.com/EFSC.html and http://www.ofbguam.org/ Reliance on credible financial management system by single auditors FY17 Financial and Single Audit issued June 25, 2018. Unmodified opinions, no material weaknesses, \$32,260 in questioned costs 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) <p>FY18 will be the sixth full fiscal year audit on Tyler MUNIS.</p>	<p>Regularly reconcile GDOE’s financial information with BBMR, DOA, and the TPFA to ensure information is accurate and supports the timely completion of audit.</p> <p>External auditor recommends TPFA report on an accrual basis.</p> <p>Provide EFSC GDOE reports on monthly basis.</p> <p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.3 Timely close accounting records (FY18) 3.F.4 Timely replies to audit requests (FY18) 3.F.6 IAO to ensure implementation of corrective action plans (FY17)</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>IC-3, Continued</p>	<p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.2 Contract Independent Audit Services (FY18) – engagement letter signed 3.F.4 Timely replies to audit requests (FY18) 3.F.6 IAO to ensure implementation of corrective action plans (FY17)</p>	
Implementation Deliverables	Completion Risks	
<p>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.</p> <p>Information management needs met by all users (e.g., custom reconciliation worksheet to support requirements and tracking of federal draw funds).</p>	<p>Low based on staff's time spent to identify and work out errors and deficiencies using the GASB 34 reporting module. Risk level – Low.</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Reports submitted to ESFC • ESFC Meeting Minutes. 	<p>Taling Taitano, DSFAS Franklin Cooper-Nurse, Chief Auditor</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED Federal Programs working with program managers and project directors to ensure that the Federal Fiscal Year (FFY) 16 Consolidated and TFASEG grants are timely closed out. Also worked to ensure FFY17 & FFY18 grants are timely expended.</p> <p>Monthly grant status reports, requisition and purchase order reports, and biweekly labor distribution reports issued to project leads and compliance staff to assist them in tracking grant balances. Follow up emails sent to project directors to remind them of balances available.</p> <p>Quarterly reports are prepared and provide a status on the various projects. Compliance with grant requirements is tested regularly.</p> <p>Project staff in place to ensure grant objectives met on timely basis.</p>	<p>Budget, Accounting, Human Resources and Procurement meet with Project Coordinators to ensure that accounts are appropriately set up, budget loaded, and any large procurement planned.</p> <p>Team is working to ensure FFY17 & FFY18 funds are timely expended.</p> <p>Workshop on the FFY18 grant scheduled for October 11 & 12.</p> <p>The Federal Programs Division will conduct regular compliance reviews.</p>
Implementation Deliverables	Completion Risks	
<ul style="list-style-type: none"> • 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. 	<p>The change from consolidation under Title 5 to RLIS will require some restructuring of programs. Risk level – Medium.</p>	

Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>IC-4, Continued</p> <p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Monthly Grant Status Reports • Requisition and Open Purchase Order Reports • Biweekly Labor Distribution Reports • Consolidated Grant Quarterly Report 	<p>Ignacio Santos, Federal Programs Administrator</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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).</p> <p>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.</p> <p>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.</p>	<p>COMPLETED</p> <p>The internal audit has gone from three auditors in 2009 to seven auditors in September 2018. Collectively, IAO has over 30 years of direct government audit experience. All 7 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 plan to schedule certification examinations. UOG interns are used year round to augment staff.</p> <p>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. IAO also created a website, a hotline, and completed its risk assessments.</p> <p>IAO has established an internal controls framework for assessment of GDOE’s internal control deficiencies. IAO’s assessment will utilize the Green Book Committee of Sponsoring Organizations of the Treadway Commission (COSO) standards for the five control components. Assessments will be formally reported in all IAO reports. Reports will make recommendations to improve internal control deficiencies.</p> <p>FY17 Financial and Single Audit issued June 25, 2018. Unmodified opinions, no material weaknesses, \$32,260 in questioned costs FY16 Financial and Single Audit issued May 2, 2017. Unmodified opinions, no material weaknesses, and no questioned costs. FY15 Financial and Single Audit issued June 6, 2016. Unmodified opinions, no material weaknesses, and no questioned costs. FY14 Financial and Single Audit issued April 29, 2015. Unmodified opinions, and no questioned costs. FY13 Financial and Single Audit issued June 26, 2014. Unmodified opinions, and \$2,285 in questioned costs.</p>	<p>The last identified SOP, Grant Procedure Manual, should be completed in 2018. Property, and certain Accounting SOPs will be updated in this quarter. IAO will select new SOPs to review in audit plan.</p> <p>3.E SEFA Reconciliation 3.E.7 IAO periodically reviews the report to determine compliance</p> <p>External auditor recommends TPFA report on an accrual basis.</p> <p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.3 Timely closing of accounting records (FY18) 3.F.4 Timely replies to audit requests (FY18) 3.F.6 IAO to ensure implementation of corrective audit plans (FY17)</p> <p>6.AE.SOP 900-020: Time Distribution Report 6.AE.8 IAO Testing of SOP 6.AE.9 IAO Reporting of Testing Results SOP is undergoing update and testing on hold until update approved.</p> <p>8.B. Reporting & Accountability 8.B.8 Management and completion of CCAP report 8.B.9 Weekly management and completion of the transition plan.</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>IC-5 Continued</p>	<p>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, and 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, and no questioned costs (Alvarez & Marsal contracted to manage US-Ed grants). FY10 Financial and Single Audit issued April 6, 2011. Unqualified opinion on financial audit, qualified opinions on Special Education Cluster, Consolidated Grant, Recover Act and Consolidated Grant, and 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, and \$4,862 in questioned costs.</p> <p>At the September Board Meeting, the Guam Education Board approved the creation of a Chief Auditor (GDOE) and Auditor IV (GDOE) positions to better align salaries in the Internal Audit Office with auditor positions at the OPA and utility agencies.</p> <p>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 3.D.8 Division/Program to conduct training on amended SOPs</p> <p>3.E SEFA Reconciliation 3.E.7 IAO periodically reviews the report to determine compliance</p> <p>3.F Timely Completion of GDOE's Financial and Single Audit 3.F.2 Contract Independent Audit Services (FY18) – engagement letter signed 3.F.4 Timely replies to audit requests – FY18 audit underway; internal team meeting weekly to ensure timely closing and response to auditors</p>	<p>Supplemental budget request passed by board and submitted to legislature to fund new positions in Internal Audit.</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>IC-5, Continued</p>	<p>3.F.6 IAO to ensure implementation of corrective audit plans – follow-ups with SPED and procurement conducted to ensure corrective action plan being implemented</p> <p>8.B. Reporting & Accountability 8.B.8 Management and completion of CCAP report 8. B.9 Weekly management & completion of the transition plan.</p> <p>IAO prepared GDOE’s Transition Plans for submittal to US-Ed and is worked with Transition Plan team to complete CCAP for quarter ended June 30.</p>	
Implementation Deliverables	Completion Risks	
<p>Updated MIC Assessment report, NAF draft reports</p>	<p>Success will hinge on successful staffing of the IAO. Salary inequities amongst government entities make it difficult to recruit and retain staff. The IAO identified a net negative manpower hours vs. assigned tasks (CCAP and TPFAs Transition Plan) and mandates (MIC, NAF, Charter Schools, and SOPs/Internal Controls) in its Audit Plan.</p> <p>Risk level – High.</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Transition Plan Updates • CCAP Update • Board approval of creation of Internal Audit positions 	<p>Franklin Cooper-Nurse, Chief Auditor</p>

Internal Controls and Procedures

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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</p>	<p>COMPLETED 3.E SEFA Reconciliation 3.E.6 Business Office provides a copy of the approved report to IAO</p> <p>Management letter comment includes concern about the time it takes to reconcile GDOE records to the TPFA records. Suggested that better and timelier coordination with TPFA is in order.</p>	<p>3.E SEFA Reconciliation 3.E.7 IAO periodically reviews the report to determine compliance</p> <p>6.AH SOP 200-44 SEFA Reconciliation 6.AH.2 Staff Training on SOP 6.AH.3 Staff Acknowledgement Forms 6.AH.9 IAO Reporting of Testing Results Last SOP update 12/4/17</p>
Implementation Deliverables	Completion Risks	<p>Work with TPFA to improve reconciliation process between GDOE and TPFA records. External auditor recommends TPFA report on an accrual basis.</p>
<p>Standard Operating Procedures and related training. No repeat findings.</p>	<p>Lack of adequate staff. Risk level – Medium.</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> SEFA Reconciliation Report 	<p>Franklin Cooper-Nurse, Chief Auditor Lourdes Perez, Comptroller</p>

Procurement

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>P-1: GDOE will develop and implement effective procurement policies and procedures that ensure:</p> <ul style="list-style-type: none"> • 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 	<p>COMPLETED</p> <p>SOP 200-015 Fixed Asset Management for Property Management Office & Central Receiving Warehouse, last update 1/10/14</p> <p>SOP 200-019 Fixed Asset Management for Schools & Divisions, last update 4/1/16</p> <p>SOP 200-018 Sole Source Procurement, last update 4/13/18</p> <p>SOP 200-020 Open Purchase Order Monitoring & Reporting, last update 4/13/18</p> <p>SOP 200-025 Procedures for Maintaining the Procurement File, last update 3/2/18</p> <p>SOP 200-026 Competitive Sealed Bidding – Indefinite Quantity Bids (IQB), last update 5/31/18</p> <p>SOP 200-027 Competitive Sealed Bidding – Invitation for Bids (IFB), last update 5/31/18</p> <p>SOP 200-030 Emergency Procurement, last update 4/13/18</p> <p>SOP 200-031 Competitive Selection Procedures for Services – Request for Proposals (RFP), last update 8/28/18</p> <p>SOP 200-033 Competitive Multi-Step Sealed Bidding, last update 11/22/16</p> <p>SOP 200-036 Request for Information Procedures, last update 11/25/16</p> <p>SOP 200-037 Requisition Entry, last update 1/11/17</p> <p>SOP 200-038 Purchase Order Change Order, last update, 2/7/17</p> <p>SOP 200-040 Protest / Appeal Procedures, last update 1/26/17</p> <p>Staff training and staff acknowledgement forms for all Procurement & Fixed Asset SOPs (Tasks 2 & 3) occur annually during the last quarter of the calendar year.</p> <p>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.</p> <p>Procurement calendar developed with end users to track key deadlines. Using contract module to assist in tracking key dates.</p>	<p>If needed, amendments to SOPs (Tasks 4 & 5) to be completed on or before December 31, 2018.</p> <p>6.K SOP 200-015 Fixed Asset Management for Property Management Office & Central Receiving Warehouse</p> <p>6.L SOP 200-019 Fixed Asset Management for Schools & Divisions</p> <p>6.T SOP 200-033: Competitive Multi-Step Sealed Bidding</p> <p>Staff training and staff acknowledgement forms for all Procurement & Fixed Asset SOPs (Tasks 2 & 3) occur annually during the last quarter of the calendar year.</p> <p>Developing plan to transition requisitions processing from TPFA system to GDOE system.</p> <p>Working to complete correction action plans related to findings in FY17 audit.</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>P-1, Continued</p>	<p>Procurement staff work closely with legal on large procurements so deadlines met.</p> <p>SOPs updated to ensure that “required by” and “expiration” dates are provided and receiving warehouse scans and attaches delivery tickets to receiving report.</p>	
Implementation Deliverables	Completion Risks	
<p>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).</p>	<p>Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High</p>	
Schedule Based upon Performance Plan	New Deliverables Completed This Quarter	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> Updated SOP SOP 200-031: Competitive Selection Procedures – Request for Proposals (RFP) 	<p>Carmen T. Charfauros, Supply Management Administrator</p>

Procurement

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED GDOE Buyer Supervisors issue to end users (a) Requisitions in Progress Reports weekly and (b) Open Purchase Order Reports monthly from the TPFA (US-Ed 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.</p> <p>Procurement added “Report of Unallocated, Rejected, and Created Requisitions” to list of monthly generated reports to track requisitions not in the workflow and therefore don’t appear on the Requisitions in Progress Reports.</p> <p>Procurement calendar developed with end users to track key deadlines.</p> <p>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).</p> <p>For items delivered to the schools and divisions by the warehouse, Receiving Warehouse will scan in delivery tickets for deliveries to school and divisions and attach to receiving reports.</p> <p>Three contracts failed to meet extension deadlines at end of fiscal year and will need to be rebid.</p>	<p>4.D Reporting & Accountability - Continue regular issuance of reports to End Users.</p> <p>Post mortem conducted to identify bottlenecks and other issues that may have led to delays. Reviewing input for Office of Attorney General to update processes for a smoother approval process. Will provide updates to process at upcoming training.</p>

Implementation Deliverables	Completion Risks	
<p>P-2, Continued</p> <p>Monthly summary of completed purchases and procurement actions; Established process for routine review of federally funded requisitions and purchase orders.</p>	<p>Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Requisition in Progress reports generated weekly • Procurement Calendar, Open Purchase Order, Unallocated, Rejected & Created Requisitions reports generated monthly. 	<p>Carmen T. Charfauros - Supply Management Administrator</p>

Procurement

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>P-3: Improve departmental procurement processes beyond those responsibilities directly related to the modules of the Financial Management Information System (FMIS).</p>	<p>COMPLETED GDOE has hired additional staff to ensure requisitions are processed timely. One Buyer Supervisor and two Buyers address US-Ed funded purchases. One Buyer Supervisor and two Buyers handle non-US-Ed funded purchases. One additional buyer is in the process of being recruited.</p> <p>Meetings held with various grant project directors upon receipt of Grant Award Notice to discuss major procurements included in grant award.</p> <p>Regular meetings held with project directors and division heads to discuss ongoing procurement status.</p> <p>Surveys to end users and vendors available on line and at procurement window. Results reviewed with staff to address concerns.</p> <p>Annual procurement training with end users held in last quarter of calendar year. Procurement is also covered as a topic at the Consolidated Grant annual workshop.</p> <p>Superintendent & Internal Audit (IA) staff attended Guam Community College (GCC) Procurement Training, FAS Deputy Superintendent, attorneys, Supply Management Administrator and all buyers have completed all 4 training modules.</p> <p>4.A Procurement Office 4.A.25 Determine the need for a Contract Management Administrator. Although requested funding for contract manager (program coordinator) was not funded in FY18 Budget appropriation, the FY19 budget request included this position.</p>	<p>Meetings held with various grant project directors upon receipt of Grant Award Notice to discuss major procurements included in grant application.</p> <p>Meetings held regularly with project directors and division heads to discuss ongoing procurement status.</p> <p>Surveys to end users and vendors available on line and at procurement window. Results reviewed with staff to address concerns.</p> <p>GCC has been contacted to determine if additional refresher Procurement Training is being scheduled.</p> <p>Position description for contract manager to be developed.</p>

Implementation Deliverables	Completion Risks	
<p>P-3, Continued</p> <p>Development and publication of procurement policies and procedures, and external verification of compliance with SOPs.</p>	<p>Recruitment of buyer and third attorney ongoing. Current freeze on hiring. Risk Level – High.</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Procurement surveys. • Meetings with End Users • Completed GCC Procurement Modules 	<p>Carmen T. Charfauros - Supply Management Administrator</p>

Property Management

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>COMPLETED</p> <ul style="list-style-type: none"> • 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, FY16 and FY17 Single Audits • Program Coordinator III was placed in charge of Property Management Office and Receiving Warehouse to focus on addressing issues regarding property management. • The Receiving & Property Management Division officially formed in FY2018. • The Receiving & Property Management Division has replaced all Property Management staff in place in 2009 and has grown from four staff to eight in 2018. • Ensure Fixed Asset Records include an identifiable funding source. With all <i>newly received</i> 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. • PMO trained on BMI Software, MUNIS and Excel and End users trained on Fixed Asset SOP prior to physical inventory kick-off; to be conducted annually. <p>5.A. Tagging of US-ED Funded Assets 5.A.7 Internal record management. Reconciliation to the TPFA system using excel. Process in place and working.</p>	<p>5.B Annual Physical Inventory 5.B.8 Generate the current year status reports for dissemination to US-ED and GDOE Upper Management. 5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. Working with Human Resources to create RPM Manager</p> <p>5.C Staff training on BMI software, MUNIS fixed assets module, computer skills 5.C.1 PMO will provide ongoing training of BMI software, Munis fixed assets 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, spread-sheet 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.</p> <p>5.E – Receiving assets (warehouse & schools) 5.E.4 – Fill the Warehouse Supervisor position. Position resubmitted in FY19. Working to identify alternate funding. FY19 Budget Act places GovGuam-wide hiring freeze from September 1, 2018-December 31, 2018</p> <p>5.E – Receiving assets (warehouse & schools)</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>PM-1, continued</p>	<p>5.B Annual Physical Inventory SY17-18 Physical Inventory scheduled for January 8, 2018 to May 21, 2018 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.10 GDOE PMO staff will conduct the current year reconciliation of US-ED funded fixed assets. 5.B.12 GDOE PMO will conduct and monitor the progress of the required follow-up actions of each site. 5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. Receiving & Property Management (RPM) has been set up a separate unit in GDOE.</p> <p>5.D Standard Operating Procedures 5.D.2 PMO will continue to enforce SOP guidelines for all fixed assets regardless of funding. Superintendent is updated regularly as to progress to clear missing assets including meetings with the management team. Follow up with units with high volume of fixed assets are regularly scheduled.</p>	<p>5.E.4 – Fill the Warehouse Supervisor position. Board approved FY19 supplemental budget request which included Warehouse Supervisor position.</p> <p>6.K SOP 200-015: Fixed Asset Management for Property Management Office & Central Receiving Warehouse 6.K.4 Amendment to SOP 6.K.5 Amendment to SOP Approved by Superintendent</p> <p>6.L SOP 200-019: Fixed Asset Management for Schools & Divisions 6.L.4 Amendment to SOP 6.L.5 Amendment to SOP Approved by Superintendent</p>
Implementation Deliverables	Completion Risks	
<p>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.</p>	<ul style="list-style-type: none"> • Recruitment for PCO vacancy due to hiring freeze. Risk level – High. • Filling of warehouse supervisor. Risk level - High 	

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
PM-1, continued		
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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).</p>	<ul style="list-style-type: none"> Status reports on missing assets 	<p>Marc Pido - Program Coordinator III</p>

Property Management

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>5.D Standard Operating Procedures SOP# 200-015 & 200-019</p> <p>Regular status reports on missing assets sent to management team for their action.</p> <p>Property Management performs regular follow-ups with divisions with high volumes of fixed assets.</p> <p>Proposal made to require issuance of staff laptops through FSAIS to ensure standardization of procedures.</p> <p>See PM-4 regarding guidance sought from US-ED.</p>	<p>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 accountability for property that is lost, damaged, destroyed or stolen. (this item is not on transition plan)</p> <p>6.K.9 & 6.L.9 IAO Reporting of Testing Results; update SOP to address identified deficiencies.</p> <p>Reviewing current documents related to technology to ensure standard across GDOE. Will consider expanding to other assets.</p>
Implementation Deliverables	Completion Risks	
<p>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.</p>	<p>Recruitment for PCO vacancy due to hiring freeze. Risk level – High. Filling of warehouse supervisor. Risk level - High</p>	<p>Next update of SOPs to include clearer language about investigations and accountability.</p> <p>Work with new ESCL Deputy on actions to be taken to resolve discrepancies.</p>
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> Status reports on missing assets 	<p>Marc Pido - Program Coordinator III</p>

Property Management

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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.</p>	<p>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.</p> <p>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.</p> <p>An accountant has been hired to be responsible for reconciling the capital fixed assets recorded in the general ledger with the fixed asset inventory system. The accountant works with various division heads to ensure assets capitalized as required.</p> <p>The Property Control Officers work with Fixed Asset Liaisons in schools and divisions on the annual inventory to include resolution of any missing assets. Regular follow-ups are made with schools and divisions with high volume of fixed assets.</p> <p>Copies of purchase orders for fixed assets are emailed to vendor, end user, appropriate federal grants project personnel, warehouse, and property. On-island vendors are required to contact warehouse 48 hours in advance and deliver before 11am. Federal grants project personnel are requested to provide distribution lists in advance of projected delivery dates.</p>	<p>5.B Annual Physical Inventory 5.B.8 Generate the current year status reports for dissemination to US-ED and GDOE Upper Management. 5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. Working with Human Resources to create RPM Manager</p> <p>Training scheduled with schools and divisions to go through upcoming SY18-19 physical inventory.</p> <p>Property control officer recruitment on hold due to FY19 Budget Act hiring freeze.</p>

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>PM-3, Continued</p>	<p>Global access provided to school fixed asset liaisons and federal grant project personnel to fixed asset records to see all fixed assets assigned to school and all fixed assets purchased by project. This facilitates communication and reconciliation.</p> <p>As inventory completed at school or division, PMOs communicate with fixed asset accountant on status of capital assets to ensure proper update of accounting records.</p> <p>5.B – Annual Physical Inventory SY17-18 Physical Inventory scheduled for January 8, 2018 to May 21, 2018</p> <p>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.</p> <p>5.B.10 GDOE PMO staff will conduct the current year reconciliation of US-ED funded fixed assets.</p> <p>5.B.12 GDOE PMO will conduct and monitor the progress of the required follow-up actions of each site.</p> <p>5.B.13 Clearly defined organizational structure, positions of leadership and associated responsibilities. Receiving & Property Management (RPM) has been set up a separate unit in GDOE.</p>	
Implementation Deliverables	Completion Risks	
<p>Inventory policies adopted by GDOE will reflect coordination and review of established policies from GDOE Property Management and Procurement.</p>	<p>Recruitment for PCO vacancy due to hiring freeze. Risk level – High. Filling of warehouse supervisor. Risk level - High</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>Activity in the “Status Report as of 9/30/18” 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, 2018 thru December 31, 2018).</p>	<ul style="list-style-type: none"> • Emails from buyers transmitting purchase orders for fixed assets • Email updates on status of physical inventory 	<p>Marc Pido - Program Coordinator III Lourdes Perez – Comptroller</p>

Property Management

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>PM-4: GDOE will ensure that US ED is reimbursed, as appropriate and consistent with federal regulations, when equipment damage results from inappropriate use.</p>	<p>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.</p>	
Implementation Deliverables	Completion Risks	
<p>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.</p>	<p>Awaiting guidance from US-Ed</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>See comments above</p>		<p>Marc Pido - Program Coordinator III</p>

Property Management

Required Actions and Activities	Status Report as of 9/30/18	Next Steps / Comments
<p>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 - December 31, 2010.</p> <p>Finding has been closed; request deletion of PM-5. Components of this section are included in PM-1 through PM-3.</p>	<p>COMPLETED. Finding No. 10-02 has been closed.</p>	<p>COMPLETED. No further steps.</p>
Implementation Deliverables	Completion Risks	
<p>Per Finding No. 10-02:</p> <ul style="list-style-type: none"> 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 	<p>System Risk – Delayed implementation of the new FMIS and its processes will impact the verification, monitoring and reporting capabilities. Risk level – Low.</p> <p>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.</p> <p>Manpower issues being addressed. Risk level – Low.</p>	
Schedule Based upon Performance Plan	New Deliverables Completed	Responsible Person/Department
<p>See comments above</p>		<p>Marc Pido - Program Coordinator III</p>