



**Rural, Insular, Native Achievement Programs (RINAP)
Progress Update**

Grantee Name CNMI Public School System

Grant

<input type="checkbox"/> ESF I – SEA	<input type="checkbox"/> IA – Consolidated Grant
<input type="checkbox"/> ESF II – SEA	<input type="checkbox"/> Republic of Palau
<input checked="" type="checkbox"/> ARP-OA SEA	<input type="checkbox"/> ESF I – Gov
	<input type="checkbox"/> ESF II – Gov

Topic¹

Internal Controls: In your responses, please describe any significant actions taken to ensure a system of effective internal controls over Federal awards that provides reasonable assurance that Federal grants are being managed in compliance with Federal statutes, regulations, and that the terms and conditions of Federal awards are operational. Examples could include documented policies for the segregation of duties, updated written standards of conduct for employees, sample internal evaluations of internal controls system, and actions taken to prevent waste, fraud, and abuse of federal funds. Provide documentation that highlights your work in this area (2 CFR §200.303 *Internal controls*).

Directions: *In preparation for the Progress Update, grantees will receive an electronic form four weeks in advance of the grantee interview to submit their responses and associated documentation. Grantees must submit their completed form (and upload any related supporting documentation) two weeks in advance of the grantee interview. Where applicable, grantees should upload documentation that supports the narrative response (e.g., public notice to stakeholders, guidance documents, sample monitoring report, media interviews, speeches, meeting agenda, etc.). Narrative responses should be brief and in bullet form, aligned with grantee goals and priorities.*

As it relates to the progress update topic:

1. What were the grantee’s key accomplishments this past quarter?
 - 100% of ARP funds have been obligated by September 30, 2024. CNMI PSS submitted a Liquidation Extension Request as a result of supply chain issues, delayed shipment, labor shortage, and project delays. As of January 2025, 96% of ARP funds have been liquidated.
 - State-of-the-art, prefabricated modular classrooms are now in use at Hopwood Middle School. CNMI PSS extends its appreciation to ED for approving our request to reprogram ARP funds for these classrooms.

¹ The topic will change for each progress update and will be selected by the U.S. Department of Education. Grantees will be notified of the topic at least one quarter in advance of progress updates and the topic will be the same for all grantees completing a progress update. The topic will be closely related to a specific, or set of related, statutory or regulatory requirements. The specific, or set of related, statutory or regulatory requirements outlining Departmental oversight authority will be cited in the electronic questionnaire distributed in advance of progress updates (e.g., Internal Controls: 2 C.F.R. 200.61).

- Adoption of Standard Operating Procedures (SOP) under the Federal Programs Office, Finance Office, and Human Resources Office.
- Completion of Grants Management Certification Training (onsite) - Deputy Budget Officer; Contract and Procurement Fraud Detection Training (onsite) - Director of Finance, Chief Procurement Officer, and Internal Auditor.
- CNMI PSS continues to strengthen its internal controls in all departments, so as to avoid errors, delays, and audit findings. Checks and balances are in place at every touchpoint.
- Improved workflows and coordination among Federal Programs Office and other key business operations offices and schools.
- Established stronger reporting structure - which requires Project Leads to report back to FPO on a monthly or quarterly basis. This allows us to catch problems early. PSS needs to have an effective grants management system to automate this process and provide real-time visibility into program performance and spending (see challenge below).

2. What were the grantee's key challenges this past quarter?

- Uncertainty over U.S. Department of Education's future and impact on CNMI PSS.
- Managing multiple grant programs and funding streams, each with its own requirements and deadlines. PSS' continued use of spreadsheets, emails, etc. for tracking and evidence-based reporting on the progress and impact of grant-funded projects. Monitoring project performance involves collecting and analyzing data, tracking key performance indicators, and demonstrating achieved outcomes. This challenge extends beyond just data collection – it requires developing an effective measurement framework and tools to assess project success.
- Something as simple as tracking requests for grant modifications, reprogramming requests, allowability, ensuring proper liquidation, reconciliations, etc. can become time-consuming.
- Issues with the new Tyler Munis Enterprise Resource Planning (ERP) System. This integrated system manages all our core functions including financials, procurement, human resources, payroll, and revenues. PSS is behind fully implementing the ERP, completing reconciliation and travel liquidations, as well as audit requests.
- Due to delays with the ERP System being fully operational, CNMI PSS continues to use paper-based methods.
- Overextended staff due to medical leave and retirement of key staff positions in key business operations offices. Multiple high priority deadlines and lack of capacity in the financial/budget unit.

3. What methods, tools, and processes are you utilizing to address these challenges?

- Need to integrate technologies, processes and approaches to overcome these challenges and reliance on paper-based on spreadsheet-driven siloed processes. This often results in bottlenecks due to their time-consuming nature and susceptibility to human errors. To ensure success, PSS will adopt a more modern approach that leverages technology to automate these processes. We can streamline operations by implementing a software solution for grants management (that may be linked to the Tyler ERP). Doing so will reduce the risk of errors and delays and optimize overall efficiency.
 - Financials are tracked in Tyler ERP, programmatic outcomes are tracked through Microsoft Office and Google Suite, and other grant portals.
- The Federal Programs Office is working with other key business operations offices, schools and departments to improve grant closeout: reconcile financial expenditures, ensure timely

liquidation of all obligations incurred under the award, submit final programmatic and financial reports on time.

- Implemented *protected time* to address high priority tasks.
 - Planning for an upcoming Work Session and Training for all grants, finance and procurement staff.
 - Manage the lifecycle of grants and prioritizing critical key activities to support closeout early in the award lifecycle. PSS is addressing closeout earlier (as opposed to in the end) in order to rectify issues and identify red flags earlier.
 - Audit PSS' current grant management processes to establish *stronger* internal controls.
4. How can the U.S. Department of Education help the grantee address these challenges?
- Continued support and check-ins, approval of liquidation extension request(s), and your grace and understanding.
5. What are the grantee's technical assistance needs related to these challenges?

As it relates to progress update topic:

- Best practices for addressing grants management and closeout.
- OMB 2022 Compliance Guidance.
- Internal controls and oversight best practices.

Public Burden Statement

According to the Paperwork Reduction Act of 1995, no persons are required to respond to a collection of information unless such collection displays a valid OMB control number. The valid OMB control number for this information collection is 1810- 0757. The expiration date is December 2, 2021. Public reporting burden for this collection of information is estimated to average 1 hour per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The obligation to respond to this collection is required to obtain or retain benefit 2 CFR 200.327 and 2 CFR 200.328. If you have any comments concerning the accuracy of the time estimate, suggestions for improving this individual collection, or if you have comments or concerns regarding the status of your individual form, application or survey, please contact Joanne Osborne, Rural, Insular, and Native Achievement Programs, Office of Elementary and Secondary Education, U.S. Department of Education, 400 Maryland Ave. SW, Rm. 3E306, Washington, DC 20202 or email joanne.osborne@ed.gov directly.