



**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 checked="" type="checkbox"/> ESF II – SEA | <input type="checkbox"/> Republic of Palau |
| <input checked="" type="checkbox"/> ARP – SEA | <input type="checkbox"/> ESF I – Gov |
| | <input type="checkbox"/> ESF II – Gov |

Topic¹

Subrecipient and Beneficiary Monitoring: In your responses, please describe any significant actions taken to ensure that Federal funds are being used for their intended purposes and in a manner that minimizes the potential of waste, fraud, and abuse. Provide supporting documentation (e.g., communication of rules, regulations, and grant requirements, grant and contractual agreements that specify grant requirements, or quarterly budget and payroll reports), as applicable. Supporting documentation should also include evidence that the subrecipient monitoring schedule outlined in the ESF Initial Report has been implemented. If implementation has not occurred as planned, provide an explanation and outline the planned subrecipient monitoring activities scheduled to occur throughout the remainder of the grant performance period.

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?
 - The CNMI Public School System’s national accreditation was reaffirmed for another six years by Cognia. This year also marks the eleventh year for the school district to transition from a school-based to a multi-school, community-wide assessment, and review process. Index of Education Quality: 295, Avg. is 253

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).

- Tyler ERP Human Resource and Payroll module went live on April 4, 2024. Audit contract awarded to Ernst & Young for fiscal years 2023 and 2024 audit. Fiscal Year 2023 audit to start sometime between May and June 2024.
- A cross-departmental team composed of Finance, Federal Programs, and Human Resource offices attended Tyler Connect Conference for the first time. Tyler Connect is Tyler’s largest annual user conference that provides classes, workshops, and in-depth training. Since the implementation of the Tyler Enterprise ERP system in January 2024, these offices have designated staff to train schools, departments, and programs.

The CNMI PSS operates as a unitary system, acting as both a State Educational Agency (SEA) and a local educational agency (LEA) for purposes of administering Federal programs, therefore, there are no subrecipients.

While CNMI PSS may not involve subrecipients, or subrecipient monitoring under the Uniform Guidance, the district meets its obligations as an SEA and LEA to ensure compliance with Federal requirements.

This includes monitoring the use of ESF I, ESF II and ARP funds, in schools, departments and programs, to ensure compliance with applicable requirements (e.g., requirements related to equipment and supplies acquired with Federal funds). The Federal Programs Office ensures compliance with requirements, and provides timely technical assistance, through effective oversight and monitoring.

Monitoring includes activities in addition to on-site program reviews:

- Training and technical assistance activities
- Desk reviews and self-monitoring
- Review of performance data and reports

Timely monitoring follow-up is essential. Providing schools, departments, and programs with feedback and ensuring that identified issues are satisfactorily addressed.

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

The Education Stabilization Fund package was an additional new funding source that enabled the CNMI PSS to introduce and sustain programs. Some of the key challenges this past quarter include:

- Allocating and re-programming funds (with prior approval); document use of funds; report on impact; invest in evidence based practices; monitor and evaluate programs and activities; assess performance in achieving intended results, while ensuring fiscal and programmatic integrity; support the use of a Return-on-Investment approach (ROI), and plan for sustainability for multiple funding streams (e.g. ESF II, ARP, and CG) can be challenging.
- The Federal Programs Office wants to achieve fast (timely) and accurate disbursement with clear accountability for impact. FPO is being asked to *stand up processes*, take in applications and proposals, and get money out the door as soon as possible—but to also minimize errors, possible questionable costs and audit findings. If done properly, the stand up process facilitates

quick and efficient interchange of ideas and feedback, keeps everyone on the same page without wasting time, and allows the team to discuss a project's progress at a high level.

- The influx of purchase requisitions, contracts, and requests for services and funding for the entire district and private schools has been overwhelming. The volume of documents and emails have caused excessive pressure to expedite reviews and approval. FPO has returned documents with clarifying questions or returned requests that are unallowable, etc.
- Significant actions have been taken to ensure that federal funds are being used for their intended purposes and in a manner that minimizes the potential of waste, fraud and abuse.

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

To address these challenges,

- (1) Implement well-developed internal controls and work flow
- (2) Cross-train staff within FPO and coordinate review process with other departments
- (3) Maintain adequate documentation for grant-related activities; and
- (4) Maintain and effective financial management system
- (5) Continue training and providing guidance through phone calls, emails, 1:1 meetings. We also use "nudge thinking" to encourage accurate and voluntary compliance. This can be particularly well suited to encouraging accurate self-reporting.

FPO leverages existing oversight capabilities and expertise from different departments, including the Commissioner's Office, to improve oversight efficiency.

FPO is in a unique situation as we have centralized expertise and information. We are able to provide the district the ability to make strategic choices, as in some cases a single activity can meet several grants' objective(s). FPO maintains a tracking sheet of all documents received, travel authorization requests, etc. FPO pushes back requisition and other documents that are questionable or deemed wasteful, duplicative, and/or excessive. Last year, we reported challenges with routing back requisition documents and Travel Authorizations which 1) lacked sufficient justification, 2) lacked any connection with project objectives and activities, 3) were not reasonable, allocable, and/or necessary, 4) were unallowed, and 5) were not in response to an identified need (backed by data).

4. How can the U.S. Department of Education help the grantee address these challenges?

- Ongoing technical assistance support, including hosting a webinar series around key grant management concepts to support grant implementation, monitoring, and close-out activities.
- CNMI PSS is part of the National Comprehensive Center (NCC) Community of Practice on Sustainability. The district will use the After-Action Review process to examine our internal processes related to pandemic recovery plans and inform our decisions on how to best sustain effective practices.

5. What are the grantee's technical assistance needs related to these challenges?

Same as above. Thank you for all the technical assistance and support provided thus far.

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.