



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

Grantee Name CNMI Public School System

Grant	<input checked="" 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-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 statues, 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: INTERNAL CONTROLS

1. What were the grantee’s key accomplishments this past quarter?
 - CNMI PSS has continuously refined over time how grants are managed. In line with recommendations from various assurance, oversight and governance bodies (including auditors), the district has improved it grant management structures, processes, controls and systems to enhance efficiency and effectiveness.
 - Adopted a monitoring and evaluation framework with the Office of Accountability, Research and Evaluation (ARE) that is scheduled to launch Spring 2022. Processes for evaluation and monitoring will be streamlined.

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).

- Performance Framework established to effectively monitor grant performance. The Performance Framework sets out the program targets against which the grant performance is assessed. Through the implementation of this Performance Framework, CNMI PSS has taken steps to address the data quality issues for existing grants, specifically the ESF I, ESF II, ARP, and the Consolidated Grant. Interim quality controls are also being implemented to ensure data quality on new grants, such as the ARP. Actions to fully operationalize this new framework are in progress.
- Although the effectiveness of the new Performance Framework process cannot yet be assessed, CNMI PSS proactive identification of the issues and the initiatives already taken to address the are indicative of maturing risk mitigation culture.
- Segregation of Duties in Grant Management & Internal Controls:
 - Federal Programs Office:
 - Federal Programs Officer
 - Director of Internal Control & Evaluation
 - Grants Program Manager
 - Director of Private Schools
 - Budget Analyst
 - Assistant Budget Analyst (*new hire*)
 - Chief Accountant
 - Accountability, Research, and Evaluation:
 - Research & Evaluation Program Manager
 - CNMI PSS Board of Education
 - Internal Auditor (*new hire*)
- Enhance the internal control environment for grant management activities by providing visibility over the full grant lifecycle.
 - Established a process of ongoing (daily/weekly) and periodic (monthly/annual) programmatic control activities that ensures compliance with laws and regulations.
 - Regularly check in meetings with key partners in the Finance Office and Procurement Office to address grant issues, such as bottlenecks, compliance reviews, etc.
 - Meet and provide regularly updates to the Board of Education, Key Management, School Leadership, and Project Leads.
- Strengthened assurance mechanisms over grant performance through a review of operational policies and procedures (ongoing) – Federal Programs Office, Finance Office, Procurement Office, State Board of Education, and Office of Commissioner of Education.

Other notable grant-specific accomplishments

ESF I

- The initial CARES Act disbursement served an essential role in early 2020 as a payroll backfill for the CNMI PSS. The local government and the tourism industry were still reeling from Super Typhoon Yutu, resulting in a lack of general fund revenue towards the

end of FY 2019. The reduced local funding stream forced the CNMI PSS to furlough non-federal staff throughout a portion of early 2020 until communications with the DoE and Assistant Secretary Brogan produced an advance of ESF I funds, halting further months of furlough.

- The ESF I remained to be a bulwark for employee morale and stability into SY 2020-2021 as roughly \$7.2M remaining to provide the district with confidence for the first few months of FY 2021 before the second CARES Act disbursement.

ESF II

- The accomplishments seen in ESF II are similar to that seen in ESF I. The DoE permitted the CNMI PSS to submit a spectrum of project proposals ranging from technology and public health to learning-loss tutor programs and school bus repairs. The \$61.7M allotted to the CNMI PSS permitted the school system to resist and rebuild during a pandemic environment.
- Program success: High-Dosage Tutoring, Mental Health, CIP and Campus Social Distancing

ARP

- Steady spending of ARP funds to safely reopen and sustain safe operation of schools
 - Vaccination for Education Campaign in full swing
 - Staffing: Certified Nurses, Literacy Coaches, ELL Teachers, Class Size Reduction Teachers, School Health Monitors
 - Procurement of Classroom Furniture and Technology
- Back to School, re-opening face-to-face on January 3, 2022
 - Elementary Schools: Full in-person
 - Middle Schools: Cohort Schedule until January 10, 2022
 - High Schools: Full in-person
- Implemented COVID-19 safety measures, vaccination data and tracking sheet.
 - Elementary Schools vaccination rate at 65% (as of January 30, 2022)
 - Secondary Schools vaccination rate at 85% (as of January 30, 2022)

Artifacts

Newspaper Articles on Return to Face-to-Face Instruction

[Update: PSS Schools' Reopening](#)

[Jan. 3: PSS to return to in-person classes](#)

[Saipan public schools to transition to face-to-face classes](#)

November 28, 2021 Memorandum - School Reopening Update

December 21, 2021 Memorandum – Resumption of In-Person Learning

January 14, 2022 Memorandum – Resumption of Athletics Program

Grant Program Evaluation Performance Framework

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

As a district, the key challenge was the evolving nature of COVID and getting students and staff back to face-to-face instruction. This includes alleviating fears amongst parents who did

not want their children to return back to campus. Citing an increase in COVID-19 hospitalizations in December 2021, CNMI Governor instituted a lock-down for two weeks for non-essential government offices. CNMI PSS followed suit for two weeks of remote learning.

Grant-specific challenges

ESF I

- The CNMI PSS experienced little to no challenges regarding the ESF I. The Department of Education was thorough and careful to begin talks with all states and territories in the last quarter of 2020. DoE specialists and leadership fielded monetary and technical questions with care and, as scheduled, provided the funding within a month of final talks.

ESF II

- The primary challenge faced by the CNMI was accurate forecasting of need. The district anticipated, for example, the need for MOU partnerships with the local hospital to have dedicated, professional nurses to test schools. What the district could not accurately predict was the need to increase from two (2) nurses to four (4), and the expanded necessity of “mobile” temperature stations. The various strategic adjustments extend into pupil transportation (social distance adherence via AM-PM “cohorts”), additional payroll backfill, distance learning equipment, and more.
- Additionally, local government revenue forecasting was difficult as well. Because the Marianas’ economy relies heavily on tourism for general revenue, all government agencies including the CNMI PSS received markedly lower funding, roughly 25 percent. The CNMI PSS was tasked with measuring the value of investing in a long-term “rainy day” fund to avoid future payroll issues versus improving district infrastructure to better adapt to the new quarantine environment.

ARP

None

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

See above.

- FPO has set up an easily accessible recordkeeping system, containing important information about CNMI PSS grant-funded projects, all funding agreements, timelines, and ongoing evaluations. Project files also include copies of emails and notes about telephone conversations with DoE. Recordkeeping, in addition to capacity building in the office, ensures that all project information is centralized and accurate, and staff are all on the same page.
- Proactive steps like cross-training grants staff, holding regular staff and stakeholder meetings, and strengthening communications with stakeholders.

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

CNMI PSS appreciates the continued guidance and support we receive from the U.S. Department of Education, especially during these challenging times.

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

We are interested in learning more about the ARP Partnership, Assistance, Transformation, and Heighted Support (ARP PATHS) tool which may provide promising practices on how other states are using ARP funds appropriately and effectively.

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.