



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

**Grantee Name** CNMI Public School System (CNMI PSS)

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**Grant**

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|--|--|
| <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            |

**Topic<sup>1</sup>**

**Grant Administration & Evaluation:** In your responses, please describe the efforts made to ensure that grant program staff are aware of their individual responsibilities and are following the policies and procedures related to the current grant. Also describe any significant actions taken to ensure Federal funds are used for their intended purposes and that the projects and activities supported by Federal funds are meeting the established goals and objectives. Provide supporting documentation (e.g., training materials; communication of rules, regulations, and grant requirements; completed project/activity evaluation instruments; communication with beneficiaries/grantees regarding the assessment or progress of projects; project timelines; or quarterly budgets), as applicable. Supporting documentation should also include evidence that the grantee has established timelines for major grant funded projects and activities and are making noteworthy efforts to adhere to the timelines if implementation of major projects or activities has not occurred or is significantly off schedule, provide an explanation and an updated schedule for how the projects or activities will be implemented or completed before the end of the grant period of performance (2 CFR §200.301; 2 CFR §200.329).

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**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?

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<sup>1</sup> 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).

- Staff from the Federal Programs Office, Procurement Office, and Finance Office completed training:
  - Introduction to Governmental Accounting & Reporting (hosted by the the Graduate School USA- PITI-VITI)
  - OMB Uniform Guidance and Government Auditing Standards Board (GASB) Updates (hosted by Ernst & young)
  - Grants Management, Audit Evidence and Documentation, The Single Audit, Auditing Grants, Project Management for Grants (hosted by APIPA)
- Actions taken to ensure ARP-OA SEA funds are used for their intended purpose;
  - Updated Standard Operating Procedures (SOPs) for the Federal Programs Office, Finance Office, and Procurement Office
  - Allowable Costs - 45 CFR 75.403
  - [Published ARP Guidance for Schools and Departments](#)
  - POs/PRs/Contracts returned with clarifying questions or rejected
  - Separate tracking of federal expenditure, Chart of Account, General Ledger
  - All federally funded activities are supported by source documentation (45 CFR § 75.302(b)(3))
    - Invoices showing vendor, date, and amount paid
    - Receipt of purchase
    - Dates on invoices and receipts that show that the costs fall within the grant period
    - Copies of canceled checks showing the amounts were actually paid
    - Connection to the grant (cost center, fund type code) – in general ledger
    - Subrecipient agreements or contracts
    - Costs that support only items listed in the grant budget
    - Travel logs
    - Personal Activity Reports/timecards/certifications
- Completed project evaluation instrument
  - [Extended Learning Opportunities \(ELO\), Summer Extended Year Learning, High Dosage Tutoring, HQIM After-Action Report](#)
- Summer School and credit recovery and enrichment programs, including Summer Career Pathway Programs were all completed.
- All schools held successful back-to-school events for parents and students
- School repairs are all underway and should be completed
- ARP-funded Professional Development activities completed over the summer in time for the new School Year 2024-2025. These include Adolescent Literacy PProfessional Learning, Classroom Instruction That Works, Science of Reading, Science of Math, High Quality Instruction That Works (pacing, differentiation, and small-group instruction using the HQIM framework), Read and Math 180, etc.

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

- Schools and programs regressing and questioning whether a particular purchase or contract is “allowed” or whether an amendment to the approved implementation plan can be made. FPO will have to walk them through needs assessment, supporting data, etc. to help them justify allowability or make the case. Amendments and evaluations are done manually through email. PSS does not have an electronic web-enabled grant system.

- Shifting mindset to investing federal funds to address student needs and focusing on learning acceleration (priority) versus school repairs or operational matters (secondary)
  - ARP spending milestones, ensuring we maximize these dollars and pair it with more sustainable federal funding streams to have the most positive and lasting impact on students and schools.
  - Fiscal capacity needed to manage critical tasks and projects, including the Tyler Munis Enterprise System.
3. What methods, tools, and processes are you utilizing to address these challenges?
- Implement well-developed internal controls and work flow
  - Cross-train staff within FPO and coordinate review process with other departments
  - Continue training and providing guidance through phone calls, emails, 1:1 meetings.
  - Collaborating with diverse stakeholders to identify student needs, particularly the needs of the most vulnerable and those most impacted by COVID-19.
  - Increase coordination with program and fiscal offices - Curriculum & Instruction; Student Support; Accountability, Research & Evaluation; Finance Office, Procurement Office, and Office of Legal Counsel to effectively address needs and potential questioned costs.
  - Educate and inform the public about allowable use, accountability, prevention and detection of fraud, etc.
4. How can the U.S. Department of Education help the grantee address these challenges?
- Ongoing technical assistance support, Non-regulatory Guidance, and webinars. We appreciate receiving information and updates from our Program Officers, newsletters from the U.S. Department of Education, and updates from Adam Honeysett, Aaron Fettgather, and CCSO.
5. What are the grantee’s technical assistance needs related to these challenges?
- Recommendation to host quarterly webinars. We attended the “Effective Grant Administration: Planning, Timeline Management, Communication, and Evaluation” webinar held on April 25, 2024. We used information here to update our workflow.

**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](mailto:joanne.osborne@ed.gov) directly.