

Appendix F

Institution Management Response

Indicate whether the answer is yes or no to the proposed questions and provide a detailed response to your answer.

1. OVERARCHING/PERFORMANCE

- a. Are the programs under Recovery Act for my organization following the existing procedures or new procedures?
- b. Are specific Recovery Act fund objectives and requirements incorporated into agency policies?
- c. Does my organization have staff adequately trained to effectively implement Recovery Act requirements?
- d. Has my organization provided new requirements, conditions, and guidance to the recipients regarding Recovery Act?
- e. Does my organization have reporting mechanisms in place to collect the required data from recipients to meet Recovery Act transparency requirements?
- f. Is there an agency-wide methodology for measuring performance? What are the key performance metrics?
- g. Are there any process metrics, or are the metrics primarily outcome-oriented?
- h. Does my organization have a corrective action plan process in place to promptly resolve the audit findings identified that may impact the ability to successfully implement Recovery Act?
- i. Has my organization established a governance body to oversee / manage the overall implementation of Recovery Act?

Management Response and Action Plan:

The programs under Recovery Act for my organization follow the procedures given to the College by the Department of Postsecondary Education.

Specific Recovery Act fund objectives and requirements are incorporated into agency policies. The Chancellor provided guidance sent in a memorandum to all colleges dated August 3, 2009.

The College has staff adequately trained to effectively implement Recovery Act requirements. Training was provided by the Department of Postsecondary Education on August 7 and 11, 2009.

The College has provided new requirements, conditions, and guidance to the recipients regarding Recovery Act. The Chancellor sent a memorandum dated August 3, 2009 and the Department of Postsecondary Education provided training on August 7 and 11, 2009.

The College has reporting mechanisms in place to collect the required data from recipients to meet Recovery Act transparency requirements. The College will report monthly updates to the Department of Postsecondary Education.

There is an agency-wide methodology for measuring performance. The College will use Recovery Act funds to pay salaries. The objective of the jobs of the individuals placed on Recovery Act funds will be listed in the report to the Department of Postsecondary Education.

The metrics of measuring success are primarily outcome-oriented. Since Recovery Act funds will be used for salaries, the outcome will be that programs are allowed to continue and students will complete those programs of study.

The College has a corrective action plan process to promptly resolve any audit findings identified that may impact the ability to successfully implement Recovery Act. For the past fiscal year, the College had no audit findings.

The governance body to oversee / manage the overall implementation of Recovery Act is the Department of Postsecondary Education.

2. REPORTING

- a. Is the necessary reporting under Recovery Act in place?
- b. Has your organization implemented communication vehicles to ensure Recovery Act data is promptly reported on the agency's website?
- c. Are reports published under Recovery Act reviewed and approved?
- d. Are reports issued accurate and have the data fields required under Recovery Act?
- e. Do reports tell agency management what is happening on a timely basis?
- f. Are issues identified through established reports addressed on a timely basis?
- g. Are reports issued on the effectiveness of risk management strategies and tactics timely?
- h. Are risk management strategies and tactics properly monitored?

Management Response and Action Plan:

A report on Recovery Act funds will be sent to the Department of Postsecondary Education by the third day of each month and then reported on federalreporting.gov.

College personnel will ensure Recovery Act data is promptly reported on the College's website by submitting the required report to the Department of Postsecondary Education for review and then placing that information on federalreporting.gov.

Reports published under Recovery Act are reviewed and approved by the Department of Postsecondary Education.

Reports issued are accurate and have the data fields required under Recovery Act.

Reports tell agency management what is happening on a timely basis.

Issues identified through established reports are addressed by College personnel on a timely basis.

Reports issued on the effectiveness of risk management strategies and tactics are timely.

Risk management strategies and tactics are properly monitored. The Department of Postsecondary Education's Internal Audit Division will visit all campuses to monitor their procedures.

1. HUMAN CAPITAL

- a. Has my organization identified qualified personnel to oversee the Recovery Act funds?
- b. Does my organization have sufficient level of personnel to manage the Recovery Act programs (for instance, Grant, Contracting, Financial Management, or IT personnel, etc.)?
- c. Are they empowered to make decisions and administer the Recovery Act programs?
- d. Are program officials trained in the performance management requirements?
- e. Has my organization considered using alternative hiring methods allowed under the Recovery Act?

Management Response and Action Plan:

The College has identified three qualified personnel to oversee the Recovery Act funds and has submitted their names to the Department of Postsecondary Education. Those individuals are Ben Jordan, Marty Kirby, and Cheryl Jordan.

The College has sufficient personnel to manage the Recovery Act programs. Three individuals have been identified and their names submitted to the Department of Postsecondary Education.

The personnel working with Recovery Act programs are empowered to make decisions and administer the Recovery Act funds.

College program officials were trained in the performance management requirements during Department of Postsecondary Education training sessions held August 7 and 11, 2009.

The College has not considered using alternative hiring methods allowed under the Recovery Act.

1. ACQUISITION

- a. Do new Requests for Proposals issued under Recovery Act initiatives contain the necessary language to satisfy the requirements of the Recovery Act?
- b. Are Contracts awarded in a prompt, fair, and reasonable manner?
- c. Do new contracts awarded using Recovery Act funds have the specific terms and clauses required?
- d. Are contracts awarded using Recovery Act funds transparent to the public? Are the public benefits of the funds used under these contracts reported clearly, accurately, and in a timely manner?
- e. Are funds used for authorized purposes and the potential for fraud, waste, error, and abuse minimized and/or mitigated?
- f. Do projects funded under Recovery Act avoid unnecessary delays and cost overruns?
- g. Are there any performance issues identified with regards to (potential) contractor? Are there follow up actions to address the performance issues?

Management Response and Action Plan:

New Requests for Proposals issued under Recovery Act initiatives contain the necessary language to satisfy the requirements of the Recovery Act. All Requests for Proposals issued will follow the regular bid process of the College.

Contracts are awarded in a prompt, fair, and reasonable manner. All Contracts awarded will follow the regular bid process of the College.

New contracts awarded using Recovery Act funds have the specific terms and clauses required. All Contracts awarded will follow the regular bid process of the College.

Contracts awarded using Recovery Act funds are transparent to the public and the public benefits of the funds used under these contracts are reported clearly, accurately, and in a timely manner. This is accomplished by submitting the monthly report to the Department of Postsecondary Education.

Funds are used for authorized purposes and the potential for fraud, waste, error, and abuse is minimized and/or mitigated by reporting all abuse to the fraud website.

The College has decided to use Recovery Act funds for salaries. Utilizing the funds in this manner, there should be no delays or cost overruns.

There are no performance issues identified with regards to contractors used by the College for Recovery Act funds.

1. FINANCIAL

- a. Has my organization established separate Treasury Account Fund Symbols to ensure Recovery Act funds are clearly distinguishable?
- b. Are there controls in place to ensure that Recovery Act funds are not commingled with other agency funds?
- c. Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse?

Management Response and Action Plan:

The College has established separate Treasury Account Fund Symbols to ensure Recovery Act funds are clearly distinguishable. All Recovery Act funds will be set up as restricted funds in the College's general ledger accounts.

There are controls in place to ensure that Recovery Act funds are not commingled with other agency funds. All Recovery Act funds will be set up as restricted funds in the College's general ledger accounts.

Existing internal controls are sufficient to mitigate the risks of fraud, waste, and abuse. All Recovery Act funds will be set up as restricted funds in the College's general ledger accounts.

1. SYSTEM

- a. Are financial and operational systems configured to manage and control recovery funds?
- b. Can financial and operational systems support the increase in volume of contracts, grants and loans etc.?
- c. Are the appropriate data elements identified that must be captured, classified and aggregated for analysis and reporting to meet Recovery Act requirements?

Management Response and Corrective Action Plan:

Financial and operational systems are configured to manage and control recovery funds. All Recovery Act funds are set up as restricted grant funds at the College and managed as a restricted grant.

Financial and operational systems can support the increase in volume of contracts, grants and loans. All Recovery Act funds are set up as restricted grant funds at the College and managed as a restricted grant.

The appropriate data elements are identified that must be captured, classified and aggregated for analysis and reporting to meet Recovery Act requirements. The College submits a monthly report of Recovery Act activities to the Department of Postsecondary Education.