

Agenda

1. 4:30 - Introduction and acknowledgment of previous meeting minutes
2. 4:35 pm - Office of Internal Performance Auditors (OIPA) activity status update
3. 4:45 pm - Discuss/review/approve OIPA budget recommendation
4. 4:55 pm - ACH (Electronic Funds Transfer System) Audit Report presentation and discussion
5. 5:15 pm - Recap of 2019-20 Performance Evaluation process for Performance Auditor; '20-21 Template
6. 5:25 pm - Status of Contract Audit implementation of recommendations
7. 5:45 pm - Other Business: Secretary of State Audit Review Process and Open Position on the Committee
8. 5:50 pm - Public Comment

To sign-up for public comment email PublicComment@pps.net or call Kara Bradshaw at 503-916-3906.



INFORMAL MINUTES

The purpose of this document is to provide an overview of the actions taken by the School Board and of discussions and reports given. Anyone interested in viewing the full meeting, please visit the School Board website at <https://www.pps.net/domain/219>.

A Meeting of the Board of Education's Audit Committee came to order at 5:02 pm at the call of the Committee Chair Brim-Edwards. This meeting was held virtually due to Covid-19 and streamed live at: <https://www.youtube.com/user/ppscomms/videos>

There were present:

Committee Members

Directors Bailey, Brim-Edwards (Committee Chair), and DePass; Student Representative Shue; Community Representative Kate Wilkinson

Staff and Other Attendees

Kara Bradshaw – Executive Assistant, Board of Education
Mary Catherine Moore – Internal Auditor
Timothy Gillette – Talbot, Korvola & Warwick (TKW)
Janise Hansen – Senior Internal Auditor
Claire Hertz – Deputy Superintendent of Business and Operations
Parker Myrus – District Student Council Representative
Tracy Pinder – Senior Director, Finance
Rosanne Powell - Senior Manager, Board of Education
Terry Proctor – Manager, Multimedia Services
Jason Romney – Talbot, Korvola & Warwick (TKW)
David Roy – Senior Director, Communications
Jackson Weinberg – District Student Council Representative

Pre-meeting

The virtual meeting opened for attendees to arrive at 4:45pm. No deliberation or decisions were made prior to the start of the meeting.

Public Comment

- None.

Report: Comprehensive Annual Financial Report (CAFR) & Report on Requirements for Federal Awards

Time Started: 5:03 pm

Mr. Timothy Gillette provided an overview of the Comprehensive Annual Financial Report (CAFR), noting that it is an unmodified opinion. He noted that they found two minor items to report. Director DePass asked if there were any corrective actions required. Mr. Gillette replied that there was no action needed for correction, adding that if the percentage of instances were higher, there would be action needed. Mr. Gillette provided an overview of the Report on Requirements for Federal Awards. He noted that the federal government strictly regulates the reporting requirements and that they found a clean report. He shared that the district has improved its financial systems and that it has been a few years since there were many issues to report.

The Committee unanimously recommended that the full Board accept the financial audits. The audits will be presented to the full Board at the Regular Meeting scheduled for December 15, 2020.

Report: Status of Secretary of State Audit Recommendations

Time Started: 5:30 pm

Director Brim-Edwards shared that the district was informed that the Secretary of State (SoS) would be returning to follow-up on the 2019 audit. Claire Hertz provided a status update on the three behind schedule implementations, as requested at the previous committee meeting. Ms. Hertz shared that for recommendation #3c the Secretary of State was looking for ways to keep bus driver costs down and that the district has proposed having two bus depots instead of one. She noted that a second bus depot would reduce the time drivers spend getting to and from their routes, as well as allow for smaller companies to bid on the proposals. She elaborated that more companies bidding for the proposals should result in lower pricing. She stated that the district is working on issuing a Request for Proposal (RFP) for each depot. She noted that the RFP process is lengthy, and the primary reason the implementation is behind schedule.

Ms. Hertz share that implementation of recommendation #1 16 is behind schedule due to the delays in the approval of the Student Conduct and Discipline Policy. She explained that the policy has been drafted but is on hold for negotiations with the Portland Association of Teachers (PAT) union because it impacts teachers. She stated that due to the pandemic, the only bargaining taking place with PAT is in relation to Comprehensive Distance Learning (CDL) and that they will move forward when that has been completed.

Ms. Hertz shared that recommendation #18B is about data tracking and coaching. She shared that the district issued an RFP for a data tracking system, but that they did not receive any responses that matched what they were looking for. She added that since then a Chief of System Performance has been hired and that he has been working on a system with the Chief of Student Support Services. She noted that the state of Oregon has also begun a statewide initiative to implement data tracking and is offering dollars through the Student Success Act (SSA) to support the work.

The Committee asked questions about the implementation of the recommendations. Director Brim-Edwards requested that the Implementation response elaborates on the amount of work and engagement conducted for the Student Conduct Policy. Director DePass asked if one vendor had to run both busing sites. Ms. Hertz replied that there could be different companies for each site or that one company could win both sites. Ms. Wilkinson asked if there was enough staff to support two companies at two sites. Ms. Hertz stated that there is enough coverage between contracted services and Portland Public Schools employees. Ms. Wilkinson asked if there was any work that has been done in regards to teacher training? Ms. Hertz stated that there is teacher training in process and that the component that is behind schedule is the tracking of the student supports.

Director Brim-Edwards noted there was no action needed from the Committee on the report.

Discussion: Additional audit options to add to the 2020-21 Audit Plan

Time Started: 5:46

Director Brim-Edwards shared that there were three audit options proposed as additions to the 2020-2021 Audit Plan, including an Enrollment and Transfer audit, an ESL audit, and a Civic Use of Buildings (CUB) facilities audit. Janise Hansen provided an overview of the three proposed audits. She noted that the primary purpose of an Enrollment and Transfer Hardship process audit would be to look at whether the transfer petitions are adequately supported and look at the impact of those decisions on student/school communities. Ms. Hansen added that the enrollment and transfer department currently does not have a system in place to centrally save documentation and evidence used for decision-making, making it challenging for the department to provide audit documentation and increases risk. She shared that an ESL audit would determine whether the district takes affirmative steps to ensure that students with limited English proficiency can meaningfully participate in educational programs. She noted that the ESL department is in the middle of reorganizing their department and that it would be better to wait until the department is established. She added that the current virtual environment would make it more challenging to connect with affected communities. Ms. Hansen stated that the advantage of completing

the facilities audit now is that there are very facility activities, noting that if any recommendations were made prior to returning to the buildings, implementation actions could occur during the transition.

The Committee responded to the proposal and asked clarifying questions. Director DePass requested that the enrollment transfers audit be disaggregated by race. Director Brim-Edwards suggested that the Enrollment and Transfer audit scope explicitly state that the audit would look for decision criteria, consistency, and transparency. Director Brim-Edwards stated that there was community feedback in support of a Hardship Transfer Audit.

Director DePass motioned to recommend to the full Board the addition of the Enrollment and Transfer Hardship Transfer Audit to the 2020/2021 Audit Plan. The motion was seconded by Director Bailey and put to a voice vote. The motion passed unanimously.

Office of Internal Performance Audit

Time Started: 6:10 pm

Ms. Hansen stated that she is requesting that the Board approve Key Performance Indicators (KPI) for the Office of Internal Performance Auditing. She provided an overview of three initial Key Performance Indicators. She shared that the target number of full audits completed per year would be 1.5 per full-time employee and that there would be a target rate of 75% of audit recommendations implemented within two years of an audit. She noted that the suggested informational performance measure would support Key Performance Indicator #1. She suggested a future Key Indicator (KPI 3) that would request feedback from Auditees and provide value and feedback to help them do impactful work.

Director Brim-Edwards noted that adopting Key Performance Indicators was suggested by the auditing department. She expressed hesitation regarding KPI 2 because an auditor could have good recommendations that are not implemented. She added that she supports implementing the proposed Key Performance Indicators as a starting point for the department. There was discussion regarding the implementation rate as an indicator. Ms. Hansen noted that tracking the rate of implementation of recommendations is an industry-standard.

There were no objections to the Office of Internal Performance Audits (OPIA) team moving forward with the Key Performance Indicators. Ms. Hansen stated that she would compile a detailed report on how the KPI's would be implemented and tracked and presented it in a future meeting.

Community Member Position for audit committee


Time Started: 6:31 pm

Director Brim-Edwards noted that there has only been one applicant for the open community member position and asked for the application to be shared with the Committee.

Adjourned

Committee Chair Brim-Edwards adjourned the meeting at 6:32 pm.

Submitted by:


Kara Bradshaw, Executive Assistant
PPS Board of Education



Audit Committee Meeting Date: January 13, 2021

Audit Status Update

ACH Audit

- Report provided in today's Audit Committee meeting

PCard Audit

- Fieldwork underway – Audit report to be presented to Audit Committee in the 04/07/2021 meeting

Student Body Activity Funds Audit

- Next audit – Planning to begin mid-February 2021

Hardship Transfer Audit

- Audit approved by the Audit Committee and it is on the agenda for full Board approval in the 1/12/21 Board meeting

Health and Safety Checks Audit:

- This audit will only be done if students begin to attend in person classes during the 2020-21 school year. If that happens, this audit will take priority over the other audits that are underway

Purpose: To document the FY22/SY 21-22 budget request for OIPA.

Account	Current year budget	FY 2022 SY 21-22	Notes	
511220 Non-Represented Staff				
521000 PERS				
521310 PERS UAL				
522000 Social Security - FICA				
523100 Workers' Compensation				
523200 Unemployment Compensation	307,334	325,774	Sum of Current year salary and benefit related costs for current year multiplied by 1.06 (6%) as an estimate increase. NOTE: Multiplier of 6% was provided by Nicole Bassen, Director of Budget & Grant Accounting	
524100 Group Health Insurance				
524200 Other Employer Paid Benefits				
524300 Retiree Health Insurance				
524530 Early Retirement Benefits				
531800 Local Mtgs/Non-Instr Staff Dev	3,996	3,996		Professional Development
531900 Other Instr Prof/Tech Svcs				
534100 Travel, Local In District	-	250		Local Travel
534200 Travel, Out of District	-	2,500		Out of District Travel
541000 Consumable Supplies	-	250		Supplies
546000 Non-Consumable Supplies	-	250	Supplies	
548000 Computer Equipment	-	1,000	Budget to plan for one new laptop every other year.	
555010 Computers	-			
564000 Dues and Fees		1,000	IIA, ALGA, CFE Membership dues	
	-			
	-			
	311,330	335,020		

23,690 estimated Increase

Summary of Increase	
5,250	Increase due to non-salary
18,440	Increase due to salary (6%) increase estimate
<u>23,690</u>	



The Office of Internal Performance Audit

Internal Audit Report

PPS Automated Clearing House (ACH) Payment Method Audit

January, 2021

**Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit**

Table of Contents

Letter of Transmittal3 - 4
ACH Payment Method Audit Report5 - 6
Appendix A – Memo to the Audit Committee7 - 9

DRAFT



**Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit**

Letter of Transmittal

January 13, 2021

Portland Public Schools
Audit Committee
501 North Dixon Street
Portland, OR 97227

At the October 9, 2019 meeting of the Audit Committee, Deputy Superintendent Claire Hertz requested the Audit Committee to add the Automated Clearing House (ACH) Payment Method Audit to the 2019-20 Audit Plan. The Audit Committee reviewed, supported the addition to the Audit Plan, and recommended the addition of the ACH Payment Method Audit to the Board of Education for approval. The Board of Education approved this addition on October 29, 2019, via Resolution No. 5988.

The objective of the ACH Payment Method Audit was to determine whether internal controls over the District's ACH payment process, follow best practices in design, and are working efficiently and effectively to mitigate potential fraud and safeguard District funds.

On Friday, August 16, 2019, Portland Public Schools (the District) experienced a fraudulent transaction attempt through its ACH payment method in the amount of approximately \$2.9 million in District funds. The Portland Police, the FBI, and PPS' partners at its banking institution quickly responded and recovered all District funds.

Due to the fraudulent transaction attempt, the District suspended enrolling new vendors in the ACH payment program. The District also suspended making changes in vendor payment account information that participate in the ACH payment program. And, if a change to the vendor account information was requested, the District removed the vendor from the ACH payment program and made subsequent payments to the vendor via check until further notice.

As of the end of our field work (November 2020), the District has not restarted its ACH payment program. As a result, we reviewed internal controls related to the setup of new vendors to the ACH payment program and account information changes for vendors who are enrolled in the ACH payment program; however, testing of these controls was not performed.

The Office of Internal Performance Audit has completed the ACH Payment Method Audit. Based on the results of work performed within the scope of the audit, it is our opinion that, overall, the internal controls over the District's ACH payment program follow best practices in design, and are working efficiently and effectively to mitigate potential fraud and safeguard District funds. Minor items that were not of a magnitude to warrant inclusion in the report were discussed verbally with management.



**Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit**

Auditing standards require that we obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings, if applicable, and conclusions based on our audit objective.

We extend our appreciation to the staff within Finance Department and the Office of Information Technology for their assistance and cooperation during the course of the audit.

We look forward to discussing the report with you at an upcoming Audit Committee meeting. Thank you for your ongoing support of the Office of Internal Performance Auditing.

Janise Hansen, CIA
Senior Internal Performance Auditor

Mary Catherine Moore
Internal Performance Auditor

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**Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit**

ACH Payment Method Audit Report

Background Information

The Automated Clearing House (ACH) Network is an electronic funds transfer process between bank accounts. The ACH Network essentially acts as a financial hub and helps people and organizations move money from one bank account to another. ACH transactions consist of direct deposits and direct payments.

The District utilizes the ACH Network to process approximately \$269 million and \$353 million in payments for the 2018-19 and 2019-20 fiscal years respectively.

In August of 2019, the District experienced a fraudulent transaction attempt through its ACH payment method in the amount of approximately \$2.9 million in District funds. In a memo to the Audit Committee, the District detailed actions taken, to address the fraudulent transaction attempt. The full memo is included in Appendix A. Below is a list of some of the actions taken by the District's Finance Department:

- Immediately stopped all ACH payments and verified the accuracy on all accounts that were scheduled to be paid on the week of August 19, 2019 and verified the accuracy on all accounts scheduled for payment this week and any ACH change requests submitted in the past six months.
- Finance Department reviewed existing protocols and procedures related to the process for paying suppliers via ACH and updated their internal controls and approval levels.
- Updated the staff training materials and conducted a mandatory training on Fraud Awareness.
- Removed the ACH Enrollment form from the District's website.

Additionally, Deputy Superintendent Claire Hertz requested the District's Office of Internal Performance Audit perform the ACH Payment Method Audit. The Audit Committee reviewed and supported the addition of the ACH Audit to the District's Office of Internal Performance Audit, and agreed to present it to the Board of Education for approval. The Board of Education approved this addition on October 29, 2019, Resolution No. 5988.

Roles and Responsibilities

District Accounts Payable management has the primary responsibility to establish, implement, and monitor internal controls. Internal Audit's function is to assess and test those controls in order to provide reasonable assurance that the controls are adequate and operating effectively. We conducted this performance audit in accordance with Generally Accepted Government Auditing Standards (GAGAS, aka Yellow Book). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Audit Objective(s)

The objective of the ACH Payment Method Audit was to determine whether internal controls over the District's ACH payment process, follow best practices in design, and are working efficiently and effectively to mitigate potential fraud and safeguard District funds.



Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit

Scope of the Audit

ACH payments made in January 2020 and vendor information changes from January 2020 through May 2020.

Audit Approach and Methodology

To achieve the audit objectives, we performed the following procedures:

- Planned the audit in cooperation with the Finance Department to ensure that we had an understanding of the District's accounts payable processes, policies and procedures.
- Reviewed processes/actions taken by the District (as detailed in the memo to the Audit Committee – see Appendix A) after the attempted ACH fraudulent activity in August 2019.
- Reviewed the reports issued by a global cyber security consultant contracted by the District to perform an investigation after the attempted ACH fraudulent activity.
- Reviewed any internal investigations that were performed.
- Inquired with PPS' Office of Technology and Information Services (OTIS) to determine if any security improvements were implemented or tested to prevent future malicious attempts.
- Analyzed available data to corroborate the information obtained during our walkthroughs.
- Reviewed applicable PPS Accounts Payable Internal Control Narrative and PPS Purchases and Accounts Payable Policy and Procedure.
- Drew on criteria from suggestions made by the District's financial institution.
- Gathered information on ACH payment processing best practices and how to combat fraud from external sources.
- Verified that all Finance staff members completed the mandatory Fraud Awareness training.
- Reviewed segregation of duties in the Finance Department.
- Reviewed appropriateness of Finance staff's access to the District's financial system.
- Utilized a sampling methodology with 95 percent confidence level to select 42 ACH transactions that occurred in January 2020 for testing of ACH payment transactions, and 20 vendor information changes from January 2020 through May 2020.
- Performed tests and analysis of the objective areas to support our conclusions.

Conclusion

Based on the results of the audit, overall we found the District's internal controls over ACH payments follow best practices in design and appear to be working efficiently and effectively to mitigate potential fraud and safeguard District funds. Testing of the District's internal controls for setting up new vendors to the ACH payment program and updating ACH payment information was not completed. When the District has resumed the process for setting up new and updated ACH payments, the Office of Internal Performance Audit will test these internal controls and issue an updated audit report.



Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit

Appendix A: Memo to the Audit Committee



PORTLAND PUBLIC SCHOOLS
OFFICE OF DEPUTY SUPERINTENDENT
Business and Operations
501 North Dixon Street / Portland, OR 97227
Telephone: (503) 916-3380 / Fax: (503) 916-

Date: August 23, 2019
To: Audit Committee Members
From: Deputy Superintendent, Claire Hertz
Subject: Update on recent fraudulent ACH transaction

This is an update regarding the recent fraudulent ACH transaction that occurred last Friday at PPS. Some of you may have spoken directly with the staff regarding this over the past week. The most important news to note - we received all funds back into our account on Tuesday morning thanks to a lot of support from FBI investigators and the two banking institutions involved in the transaction. Below is a list of actions that we have taken and/or are in progress.

You will also see a message from the Superintendent that we sent out to staff and school communities that was translated into our key languages for families.

Please do not hesitate to reach out to me if you have any questions.

ACTIONS TAKEN/IN PROGRESS/PLANNED:

Finance Department:

- Immediately stopped all ACH payments scheduled to be paid on August 19 and verified the accuracy on all accounts scheduled for payment this week and any ACH change orders submitted in the past six months
- Reviewed existing protocols and procedures related to the process for paying vendors via ACH and added additional internal controls and approval levels
- Updated staff training materials and conducted mandatory training for all finance department staff on Tuesday, Aug. 20
- All new finance staff will be required to complete fraud prevention training before accessing the district's finance information system
- Requested PPS auditors of record, TKW, to immediately launch an investigation of all vendor payment processes, protocols and internal controls; TKW meeting occurred on August 19 to begin this work
- District finance department leaders met with top Wells Fargo executive on Monday to review event and update incident and contact information
- Conferred with Carol Samuels, PPS bond financial advisor, on Monday to confirm disclosure to bondholders is not necessary



Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit

- Removed contracts from our website and will allow access to PPS contract information through our public records request process Removed ACH Enrollment form from district website - vendors will need to request form from finance staff, which will include a verification process confirmed with vendor information already on file with the district

Human Resources:

- Worked in conjunction with IT and Security Services to suspend two employees' access to all PPS systems and buildings August 19
- Both employees placed on paid administrative leave pending investigation
- Providing support to Legal and external investigator on workplace investigation

Law Enforcement/Security:

- Immediately contacted Portland Police Bureau
- Filed Internet Fraud Claim paperwork with FBI
- FBI recovered all funds from fraud incident
- PPS Security Services continues to assist and support law enforcement investigations and inquiries

Legal and Risk Management:

- Consulted outside legal counsel to, among other things, establish priority, direct line of communication with FBI
- Filed claims under relevant district's insurance policy to pay for breach response investigation; assessing whether current coverage limits are sufficient Secured consultant to perform security breach investigation and workplace misconduct investigation
- Along with Finance and IT teams, interfacing with FBI to provide information for criminal investigation

Office of Technology and Information Systems:

- Immediately disabled two employees' email and online access to all PPS systems
- Lead contact on security breach investigation and system assessment

Other notes:

- PPS has secured three external investigations regarding the incident:
 - Forensic cybersecurity review
 - Financial systems and control
 - Workplace process and employee conduct



**Internal Performance Audit Report
ACH Audit
PPS Automated Clearing House (ACH) Payment Method Audit**

SUPERINTENDENT'S MESSAGE TO STAFF AND SCHOOL COMMUNITIES

Dear PPS Staff and School Communities,

We want to let you know that Portland Public Schools has been working since Friday with law enforcement and financial institutions in response to a banking crime involving the district. Fortunately, we have confirmed that the banking institutions involved have frozen the approximately \$2.9 million in district funds that were transferred to a fraudulent account disguised as the account of a legitimate PPS construction contractor. PPS has already begun the process to recover and fully return the funds back to the district, likely within the next several days.

Once we were made aware of this fraudulent transaction on Friday, we immediately notified law enforcement, including the FBI and Portland Police Bureau, as well as the Board of Education. We also began an internal investigation to determine the origin of this transaction and how and why the transaction was processed by PPS.

Following standard procedure, two district employees involved with processing the transaction were placed on paid administrative leave, pending a full investigation. Initial information indicates that the fraud was perpetrated externally and no district employee engaged in criminal activity; however, the district is implementing best practices to investigate this case thoroughly.

All district payment procedures and internal controls are being reviewed, additional protocols and actions have already been identified, and all district finance staff will receive mandatory, updated training this week to reinforce protocols and to ensure updated procedures are in place to prevent incidents like this from occurring. We have conducted an initial review of previous transactions, as well as a review of vendor account management and fund transfer protocols. In addition, we have updated our fraud awareness training materials.

All of this is being followed by a full, independent, external investigation involving outside experts from the fields of online security, financial processes and controls, and workplace fraud. Additionally, the district's external auditor will independently review our financial controls and vendor management protocols.

We are treating this incident with the utmost seriousness. We will continue to cooperate fully with law enforcement to protect school district funds and to apprehend the perpetrators. We thank Portland Police, the FBI, and our partners at Wells Fargo for their quick response and assistance they have extended to PPS over the last four days. Unfortunately, school districts and educational entities around the country have increasingly become targets of financial fraud and cyber security threats. We will use this instance to further strengthen our financial controls and plan to share our experience with other school districts.

Sincerely,

Guadalupe Guerrero
Superintendent



Contracts Audit
Implementation Plan

Due October 1, 2020

Signature Approvals	Date Approved
Emily Courtmage, Director of Purchasing & Contracting Tracy Pinder, Director of Financial Services Legal - Mary Kane Dani Ledezma, Senior Advisor, Racial Equity & Social Justice Instructional Tab Claire Hertz, Deputy Superintendent of Business and Operations Superintendent (or designee)	

2020 Contracts Audit Recommendations					Implementation Plan			Status Updates			
#	Abbreviated Recommendation	Response	Responsible Administrator / Manager	Comment	Implementation Plan (Specific steps to be implemented)	Anticipated date implementation will be complete (generally expected within 6 months)	Comments	Status update as of Dec 2020	Status update as of XXXX	Status update as of XXXX	Status update as of XXXX
1	1. Re-evaluate internal controls to ensure all District staff who manage or work with contracts complete the mandatory contracting training course prior to the established deadline.	Agree	Emily Courtmage, Director of Purchasing & Contracting	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	For the 2020-21 school year, we changed our practice as follows: We completed updating the 20-21 contracting course in June 2020 and published the new version in late June. We posted notice in Admin Connect on June 30 and July 7: "Effective July 1, 2020, the 2020-21 course must be completed before you submit a contract for the 2020-21 school year." Thus, the course requirement was effective immediately with no "grace period" as in prior years. We continue to check for course completion by contract manager and contact person with every contract that is submitted.	Completed as of July 1, 2020		Completed			
2	2. Maximize the benefit of the training course, by requiring the training course applicable for the contract term, to be completed by the required staff prior to initiating the contract.	Agree	Emily Courtmage, Director of Purchasing & Contracting	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	See response to Recommendation 1, above.	Completed as of July 1, 2020		Completed			
2 a)	Consider changing the deadline for the required training course to August 1st of the applicable year.	Partly Agree	Emily Courtmage, Director of Purchasing & Contracting	We agree with the recommendation to change the course deadline and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, we do not agree that August 1st is a realistic course completion deadline, particularly for school staff and administrators. We will propose a new annual course update schedule and completion deadline designed to better address Recommendations 1 and 2.	See response to Recommendation 1, above.	Completed as of July 1, 2020		Completed			
3	Develop and implement internal controls that will ensure a thorough and robust review and evaluation of the contracts performance is completed and documented prior to deciding whether or not a similar contract should be negotiated in the future	Agree	Instructional Leadership, RESJ leadership	Instructional Leadership agrees with the recommendation and will include action steps within our implementation plan presented to the Audit Committee within 60 days. As noted in the Audit, the personal services contracts that include RESJ Partnerships are currently part of a robust review and reimagining. All contracts are currently subject to a competitive process where proposers are asked to submit documentation of both proposed and prior contract performance to complete a scope of work. The request for proposals includes required narrative and a logic model that describes the contract outputs (service delivered) and intended student outcomes that will form the basis of the contract reporting and district evaluation for awarded proposers. This competitive process will provide the basis for contract awards for up to three years upon successful completion of required contract deliverables each school year. The basis for contract negotiation is outlined in both the PPS RESJ Partnerships Investment Strategy and the 2019-2700 RESJ Partnerships solicitation.	Instructional Leadership: Instructional Leadership: Contract managers who manage significant instructional or student services contracts will provide a summary of performance metrics met or unmet and provide recommendations in regards to future contracting. This information will go to supervisors and be uploaded into Cobblestone contract management software.	Instructional Leadership: March, 2021	Instructional Leadership: CBO Additions: All CBO Schools are awarded contracts through a competitive RFP process which occurs every 5 years. Contracts are renewed and amended annually and include a range of different accountability measures as part of a robust Alternative Accountability Framework, which encompasses ongoing data review as well as submission of annual reports and deliverables. All contracts include relevant and district/state aligned performance objectives. Contracts are aligned with ORS 336.631 which include rules for Private Alternative Education.	Instructional Leadership:			
					RESJ leadership: 1. RFP process for RESJ Contracts occurred in summer 2020. 2. RESJ and SPP will develop an evaluation process for RESJ Contracts. SPP Staff assigned to conduct the performance management and evaluation process. This will be an annual process.	RESJ leadership: 1. Complete 2. Evaluation and Monitoring processes are ongoing. SPP staff assignment is complete. Evaluation development is in process with expected completion by December 2020	RESJ leadership: RESJ leadership:	RESJ leadership:			

3 a)	Update the contracting training course to include additional guidance and expectations related to review and evaluations	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Our 2020-21 mandatory contracting training course includes additional guidance on contract review and evaluation, including evaluation of, and keeping a record of, performance and outcomes.	Completed as of July 1, 2020		Completed			
3 b)	Utilize the content of the Board Cover Memo to create a template for Contract Managers to document the review and evaluation for all contracts.	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation as it applies to large instructional, family engagement, and student services contracts (for which the Board Cover Memo was designed) and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	The P&C department implemented new contract management software (Cobblestone) in the summer of 2020. Over the next several months, P&C will train contract managers on its use. One of the capabilities of the new software is the ability of P&C staff to trigger custom surveys (or evaluation questionnaires) to specific contract managers, with any responses automatically saved in the system. P&C staff can develop a specific survey for significant instructional, family engagement, and student services contracts originating out of Central Office and involving direct, ongoing, intensive instructional and support services to students and families. Surveys can be triggered at contract expiration to the contract managers of these specific contracts.	March 31, 2021		On Target			
3 c)	Require the review and evaluation be reviewed and approved by the Contract Manager's supervisor and submitted to the P&C Department for record keeping.	Partly Agree	RESJ Leadership & Instructional Leadership & Emily Courtnage, Director of Purchasing & Contracting	presented to the Audit Committee within 60 days. However, while P&C can provide instruction to contract managers and a central and accessible repository for all contract related documents, P&C does not have contracting staff capacity to manage the collection, submission, and supervisor approval of contract performance reviews for all instructional contracts nor the subject matter expertise to judge the content or accuracy of such reviews. Instructional Leadership agrees that there will be a review and evaluation of the contract by the contract manager and that they will inform their supervisor when they have completed that process and uploaded the information. We disagree that the supervisor of the contract manager will also review and evaluate the contract as this is redundant work and that the contract manager is capable of doing this. RESJ leadership agrees with the recommendation to document contract compliance activities, however given	RESJ Leadership: Instructional Leadership: Instructional Leadership: Contract Managers will upload review and evaluation documentation into Cobblestone contract management software for record keeping once the processes are completed and they will inform the supervisor upon completion.	RESJ Leadership: Instructional Leadership: March 2021	RESJ Leadership: Instructional Leadership: Instructional Leadership:	RESJ leadership: On Target			
				Instructional Leadership agrees that there will be a review and evaluation of the contract by the contract manager and that they will inform their supervisor when they have completed that process and uploaded the information. We disagree that the supervisor of the contract manager will also review and evaluate the contract as this is redundant work and that the contract manager is capable of doing this.	Emily Courtnage, Director of Purchasing & Contracting: P&C: One of the advantages of the new Cobblestone contract management software (Cobblestone) is the ability of contract managers to save all contract-related documents, including work documents, email communications, and any contract deliverables and evaluations, in a centralized, easily accessible location. We will instruct contract managers that they should save such key contract documents, including any reviews and evaluations, in the contract record in Cobblestone.	Emily Courtnage, Director of Purchasing & Contracting: March 31, 2021	Emily Courtnage, Director of Purchasing & Contracting: Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting: On Target			
3 d)	d) Increase transparency by saving all review and evaluations in a central and accessible location so they can be easily accessed and reviewed by stakeholders	Partly Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation that contract documents, including any reviews and evaluations provided by contract managers, should be saved in a central location and readily accessible to District staff, and we will include implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, while P&C can provide instruction to contract managers and a central and accessible repository to facilitate compliance with this recommendation, P&C does not have contracting staff capacity to manage and ensure the collection and submission of contract performance reviews for all instructional contracts.	See response to Recommendation 3(c) above.	March 31, 2021		On Target			
4	Develop and implement internal controls that will ensure all contracts include appropriate and specific deliverables, performance measures, expected outcomes, how the performance of the contract will be measured, and reporting requirements tailored to the particular contract.	Agree	Instructional Leadership & Emily Courtnage, Director of Purchasing & Contracting & RESJ leadership	recommendation that our internal controls (including mandatory templates and training and the contract approval process) should help ensure that instructional, family engagement, and student services contracts include appropriate deliverables, performance measures, and expected outcomes, and we will include implementation actions in our implementation plan presented to the Audit Committee within 60 days. Instructional Leadership agrees and will include implementation actions to ensure all contracts include appropriate and specific deliverables, performance measures, expected outcomes, how the performance of the contract will be measured, and reporting requirements tailored to the particular contract. RESJ - Agree with the recommendation. The current competitive process scores and evaluates proposed scope of work and deliverables measured against a proposed logic model that describes expected outcomes and measures for which ongoing reporting will be required. Once selected, contractors will negotiate final terms and in partnership and RESJ will collaborate with the Office of School Performance to develop system measures to	RESJ Leadership: 1. RFP process for RESJ Contracts occurred in summer 2020. 2. Execute RESJ Partnership Contracts with appropriate deliverables, performance measures and outcomes.	RESJ Leadership: 1. Completed 2. 15 of 16 contracts executed and approved by board by October 6, 2020. Final contract to be executed by November 2020.	RESJ Leadership: 1. Completed 2. All contracts have been executed. All contracts will be amended to include updated reporting, invoicing and parent notification procedures by February 2021.	RESJ leadership: Completed			
				Instructional Leadership agrees and will include implementation actions to ensure all contracts include appropriate and specific deliverables, performance measures, expected outcomes, how the performance of the contract will be measured, and reporting requirements tailored to the particular contract.	Instructional Leadership: Instructional Leadership: All contracts will include specific deliverables, performance measures, and expected outcomes.	Instructional Leadership: March 2021	Instructional Leadership: Instructional Leadership:	Instructional Leadership: Instructional Leadership:			
				RESJ - Agree with the recommendation. The current competitive process scores and evaluates proposed scope of work and deliverables measured against a proposed logic model that describes expected outcomes and measures for which ongoing reporting will be required. Once selected, contractors will negotiate final terms and in partnership and RESJ will collaborate with the Office of School Performance to develop system measures to	Emily Courtnage, Director of Purchasing & Contracting: P&C: See responses to Recommendations 3(a) through 3(d) above. Our 2020-21 mandatory contracting training course includes additional guidance on contract review and evaluation, including evaluation of, and keeping a record of, performance and outcomes. In addition, Cobblestone contract management software will provide a centralized and accessible location to save all contract documents.	Emily Courtnage, Director of Purchasing & Contracting: March 31, 2021	Emily Courtnage, Director of Purchasing & Contracting: Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting: On Target			

4 a)	Require the use of the Specialized SOW template	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Our 2020-21 contract training course includes new guidance stating that the specialized scope of work template is mandatory for contracts for student, instructional, or family engagement services originating out of Central Office and involving direct, ongoing, intensive instructional and support services to student and families. The P&C contract review team looks for this template in applicable contracts during the contract review and approval process.	Completed as of July 1, 2020		Completed			
4 b)	Require the appropriateness of the specific deliverables, performance measures, expected outcomes, how the performance will be measured, and reporting requirements tailored to the particular contract be reviewed and approved by a qualified Educational Specialist who is not involved with the management of the contract.	Partly Agree	Instructional Leadership	Instructional Leadership partly agrees with this recommendation. Staff outside of the contract that are qualified educational specialists do not have time in their current workload to review and approve the specific deliverables, performance measures, expected outcomes, how the performance will be measured and reporting requirements. The Executive Instructional Leadership Team (ELT) made up of the Deputy Superintendent, Chief of Schools, Chief Academic Officer, and Chief of Student Support Services will review and approve these elements on contracts going to the Board for approval.	Instructional Leadership: Instructional Leadership meets twice weekly and reviews contracts before they go to the Board and checks contract managers to ensure they have specific deliverables, performance measures, expected outcomes, how the performance will be measured, and reporting requirements tailored to the particular contract.	March 2021					
4 c)	Increase transparency by saving the completed Specialized SOW template in a central and accessible location so they can be easily accessed and reviewed by stakeholders.	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation that contract documents, including statements of work, should be more readily accessible to District staff and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Over the next several months, P&C will train contract managers and administrative assistants on the use of the new Cobblestone contract management software. All contract documents, including Contract Approval Forms, contracts, scopes of work and other exhibits are now saved with the contract record in the system. Contract records can be searched and viewed by District staff.	March 31, 2021		On Target			
5	Provide an update to the Board to communicate the District's phased implementation of the mandatory training requirements for contractors and the delay in full implementation.	Partly Agree	Legal - Mary Kane	We agree with the recommendation to the extent it applies to those contractors that have direct and substantive interaction with students and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	General Counsel's office will prepare a memo outlining the plan.	October 20, 2020					
6	Develop and implement internal controls to ensure all mandatory training courses are included in all contracts that require interactions with students.	Partly Agree	Legal - Mary Kane and Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation to the extent it applies to those contractors that have extensive and substantive interaction with students. We will continue to work with a group of leaders already convened from multiple departments to develop appropriate systems and guidance. We will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Legal - Mary Kane: General Counsel's office has convened a group of leaders who are working on developing a mechanism for including training requirements in applicable personal services contracts. As soon as clear guidance is developed and incorporated in contracts, we will communicate the new expectations with contract managers.	Legal - Mary Kane: July 1, 2021	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:		
					Emily Courtnage, Director of Purchasing & Contracting: General Counsel's office has convened a group of leaders who are working on developing a mechanism for including training requirements in applicable personal services contracts. As soon as clear guidance is developed, we will incorporate the requirements in contract templates and communicate the new expectations to contract managers.	Emily Courtnage, Director of Purchasing & Contracting: July 1, 2021	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	On Target	
6 a)	District Management develop detailed guidance and expectations related to the mandatory training requirement for contracts that require contractors and their staff to interact with PPS students.	Partly Agree	Legal - Mary Kane	We agree with the recommendation to the extent it applies to those contractors that have extensive and substantive interactions with students; however, we will not be able to develop the guidance and expectations related to mandatory training within the next 60 days.	General Counsel's office has convened a group of leaders who are working on developing a mechanism for including training requirements in applicable personal services contracts. As soon as clear guidance is developed and incorporated in contracts, we will communicate the new expectations with contract managers.	July 1, 2021					
6 b)	The P&C department communicate the detailed guidance and expectations to Contract Managers throughout the District	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation and will consider including implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, P&C cannot implement this recommendation until the internal controls and detailed guidance and expectations referenced in Recommendation 6 and 6(a) are developed.	See response to Recommendation 6, above. In addition, any new guidance regarding contractor training requirements will be included in the 2021-22 update of the mandatory contracting training course.	July 1, 2021		On Target			
6 c)	Update the contracting training course to include guidance and expectations related to the inclusion of the mandatory training courses in applicable contracts; including if or when exceptions can be made and the process for obtaining an exception.	Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation and will consider including implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, P&C cannot implement this recommendation until the internal controls and detailed guidance and expectations referenced in Recommendation 6 and 6(a) are developed.	Any new guidance regarding contractor training requirements will be included in the 2021-22 update of the mandatory contracting training course.	July 1, 2021		On Target			

6 d)	Establish a clear and mandatory channel of communication between the P&C department and Contract Managers (in addition to the annual contracting training course) to communicate and distribute guidance and expectation for Contract Managers on topics related to contracting	Disagree	Emily Courtnage, Director of Purchasing & Contracting	We agree that it is important to have clear channels of communication between the P&C Department and contract managers. However, multiple channels of communication are already in place and regularly utilized: (1) The mandatory annual contracting training course; (2) The frequently updated P&C website with announcements, Quick Guides, and new contract templates and forms with instructions; (3) Admin Connect, where we post announcements related to the contract course and other new contracting guidance generally applicable to contract managers; (4) Emails sent via the Communications Department email lists to all BESC staff, all school administrators, and all principals' secretaries; (5) Back to School and Finance trainings for principals' secretaries and admin assistants and New Leaders trainings for new school administrators; and (6) Emails sent to specific contract managers when a new initiative or requirement (such as the Board Cover Memo) is applicable only to a few contract managers. We regularly utilize all of these channels and do not believe any additional communication channel is required.	No action needed.	NA		Completed			
7	7. Develop and implement internal controls to ensure the District obtains evidence that the contractors and their employees have completed the mandatory training course as required in the contract.	Agree	Legal - Mary Kane and Emily Courtnage, Director of Purchasing & Contracting	We agree that contract managers need clear guidance on when and how to ensure that contractors have completed any required training courses before beginning work. We will continue to work with a group of leaders already convened from multiple departments to develop appropriate systems and guidance. We will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Legal - Mary Kane: General Counsel's office has convened a group of leaders who are working on developing a mechanism for including training requirements in applicable personal services contracts. This group is also exploring how best to ensure contractor compliance. As soon as clear guidance is developed and incorporated in contracts, we will communicate the new expectations with contract managers.	Legal - Mary Kane: July 1, 2021	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:		
					Emily Courtnage, Director of Purchasing & Contracting: Any new guidance regarding contractor training requirements will be included in the 2021-22 update of the mandatory contracting training course. In addition, as soon as clear guidance is developed and incorporated in contract language, the P&C department will notify contract managers.	Emily Courtnage, Director of Purchasing & Contracting: July 1, 2021	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	On Target	
					Legal - Mary Kane: The P&C department will include any new guidance regarding contractor training requirements in the 2021-22 update of the mandatory contracting training course. In addition, as soon as clear guidance is developed and incorporated in contract language, the P&C department will notify contract managers.	Legal - Mary Kane: July 1, 2021	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:		
7 a)	Develop adequately detailed guidance and expectations and communicate that content with Contract Managers.	Agree	Legal - Mary Kane and Emily Courtnage, Director of Purchasing & Contracting	We agree that contract managers need clear guidance on when and how to ensure that contractors have completed any required training courses before beginning work. We will continue to work with a group of leaders already convened from multiple departments to develop appropriate systems and guidance. We will will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Legal - Mary Kane: The P&C department will include any new guidance regarding contractor training requirements in the 2021-22 update of the mandatory contracting training course. In addition, as soon as clear guidance is developed and incorporated in contract language, the P&C department will notify contract managers.	Legal - Mary Kane: July 1, 2021	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:		
					Emily Courtnage, Director of Purchasing & Contracting: Any new guidance regarding contractor training requirements will be included in the 2021-22 update of the mandatory contracting training course. In addition, as soon as clear guidance is developed and incorporated in contract language, the P&C department will notify contract managers.	Emily Courtnage, Director of Purchasing & Contracting: July 1, 2021	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	On Target	
					Legal - Mary Kane: The P&C department will include any new guidance regarding contractor training requirements in the 2021-22 update of the mandatory contracting training course. In addition, as soon as clear guidance is developed and incorporated in contract language, the P&C department will notify contract managers.	Legal - Mary Kane: July 1, 2021	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:		

14	We recommend the District review contract payment processes and procedures for process improvements and efficiencies to ensure payments to contractors are made timely as required in the contract. Additionally, we recommend the District document the date the invoice was received.	Agree	Tracy Pinder, Director of Financial Services	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	The Accounts Payable (AP) Team consistently reviews business processes for improvements and efficiencies. Additionally, AP is working with our Financial Systems Team on areas within our ERP to streamline invoice entry, looking to decrease Accounts Payable turn time. The Request for Payment on a Contract (RFP) form has been updated to include an "Invoice Receipt Date" to better track the flow from invoice receipt to invoice payment. (The mandatory contracts training course has also added language that contract managers should document the date of receipt on the invoice and RFP.) In addition to the mandatory contracts training course, the Finance Team utilizes other training opportunities for those who hold fiscal responsibility, including principal's secretaries, business analysts, bookkeepers, business managers and administrators. This training is meant to ensure understanding of budgeting, appropriate expense codes, purchasing & contracting and accounts payable.						
15	We also recommend the District consider centralizing the receipt of contract invoices.	Partly Agree	Tracy Pinder, Director of Financial Services	We partly agree with the recommendation, as centralizing receipt of invoices is a suggested best practice. However, implementation would be a significant shift in current practice and would require additional central office FTE to manage all District invoices centrally.	Due to the number of schools, programs and departments within the District, it is difficult to centralize receipt of invoices. Currently, the Finance Team relies on education for those who hold fiscal responsibility. This training is meant to ensure understanding of the contract management cycle, from contract inception to invoice payment. In addition to the contract training course in Pepper, the Finance Team delivers training to principal's secretaries, bookkeepers and business managers annually in August. Also, beginning in fiscal 2019, as part of the New Administrators Mentor Program, the Finance Team presented similar training to school Administrators. Additionally, the Accounts Payable Team includes monthly Supplier Statement reconciliation as part of their business processes.						
16	To ensure contract management responsibilities are being performed as expected, we recommend the District develop and communicate detailed guidance and expectation related to contract management responsibilities.	Partly Agree	Emily Courtnage, Director of Purchasing & Contracting	We agree with the recommendation that P&C should build on, and provide more detailed guidance in, our training materials and templates related to contract management responsibilities, and we will include implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, while P&C can instruct contract managers on contract management responsibilities and best practices and provide tools to assist with contract management, it does not have capacity to supervise or oversee contract managers' management of their own contracts.	Our 2020-21 contract training course includes additional guidance on contract management responsibilities, how to draft a scope of work, use of the specialized scope of work template, contract deliverables, and contract review and evaluation.	Completed as of July 1, 2020		Completed			
16 a)	a) Identify personal services contracts for student services as complex contracts and increase requirements for those contracts to include: o Develop an additional contract management training course that Contract Managers of complex contracts are required to complete prior to initiating the contract. o Require complex contracts include a contract administration plan (similar to that used by the State of Oregon) that is review and approved by the Contract Manager's supervisor and submitted to P&C for recordkeeping.	Partly Agree	Emily Courtnage, Director of Purchasing & Contracting	We partly agree with the recommendation and will consider including implementation actions in our implementation plan presented to the Audit Committee within 60 days. However, we do not believe it will be effective to add to the already significant time burden of mandatory online trainings for staff. We will consider different methods of providing additional specialized instruction or advice to the relatively few contract managers who manage complex instructional contracts.	Our 2020-21 contract training course includes new guidance stating that the specialized scope of work template is mandatory for contracts for student, instructional, or family engagement services originating out of Central Office and involving direct, ongoing, intensive instructional and support services to student and families. P&C Management also communicated the new requirement directly to relevant contract managers by email. We believe that the mandatory, detailed scope of work template, and the additional content in the training course, together are sufficient to address the added complexity of these specialized contracts.	Completed as of July 1, 2020		Completed			

17	Develop and communicate oversight of contract management responsibilities, including how performance of contract management responsibilities will be evaluated. To achieve this, we recommend the District consider updating position descriptions to include contract management responsibilities and include an evaluation of the performance of these responsibilities in the staff member's annual performance evaluation.	Partly Disagree	Instructional Leadership & RESJ leadership	In most cases, the responsibility of contract management is not specific to a job. For example, we may have an Academic Program Manager who has responsibility for a contract but the majority of individuals who are Academic Program Managers do not have this responsibility. We do not have the ability to track every single assigned duty in a job description. Instructional Leadership partly agrees with the recommendation to include contract management in performance evaluation. Depending on the contract manager and the situation, contract management will only be included in performance evaluation where appropriate. RESJ Leadership partly agrees that contract managers for	Instructional Leadership: Instructional Leadership: On an as needed basis performance evaluation will include an employee contract management performance. RESJ leadership: 1. Develop job description for RESJ partnerships programs manager, and RESJ Project Manager to include contract management and oversight responsibilities. 2. Hire staff. 3. RESJ and SPP will develop an evaluation process for RESJ Contracts. SPP Staff assigned to conduct the evaluation annually..	Instructional Leadership: Instructional Leadership: March 2021 RESJ leadership: 1. Complete 2. Complete by December 2020 3. see above	Instructional Leadership: RESJ leadership: 2. Hired RESJ Project Manager, conducting interviews for RESJ Partnership Program Manager in January 2021. 3. SPP and RESJ Advisory are working with RESJ partners to develop comprehensive evaluation process to begin in 2021/22 SY.	Instructional Leadership: RESJ leadership: On Target
18	Prior to assigning a Contract manager, supervisors of the proposed Contract Manager should evaluate the positions' other roles and responsibilities to ensure those assigned contract management responsibilities have adequate time to perform the contract management responsibilities while also performing the roles and responsibilities in their position descriptions	Partly Disagree	Instructional Leadership & RESJ leadership	Instructional Leadership partly agrees with this recommendation. Supervisors will review workload with managers in general, but it is incumbent upon the manager to ensure that they have completed all duties of contract management and to surface any challenges with their supervisor.	Instructional Leadership: Instructional Leadership: As needed Supervisors will ensure contract managers are able to fulfill their contract manager duties. RESJ leadership: 1. Develop job description for RESJ partnerships programs manager, and RESJ Project Manager to include contract management and oversight responsibilities	Instructional Leadership: Instructional Leadership: March 2021 RESJ leadership: 1. Complete	Instructional Leadership: RESJ leadership: Completed	Instructional Leadership: RESJ leadership: Completed
19	We recommend the District take additional steps to implement a comprehensive and systematic approach to improve performance management of personal service contracts. To achieve this we recommend the District consider scaling the District's comprehensive and systematic approach to improve performance management of personal service contracts identified by the District as RESJ partnership contracts to include all of the District's personal service contracts with educational partners.	Partly Agree	Instructional Leadership & RESJ leadership	Instructional Leadership and RESJ leadership agree to partner on the updated processes for personnel service contracts. RESJ leadership has collaborated with Instructional Leadership in the development of the RESJ Partnerships Investment Strategy as well as the RFP process. Instructional Leadership staff and members participated in the RFP scoring process and has committed to working in collaboration with RESJ to support ongoing relationship development with contractors at school sites. This includes participation in quarterly data review meetings and convenings aimed at increasing collective impact. We will have an implementation plan within 60 days.	Instructional Leadership: Instructional Leadership: We will continue to partner with RESJ leadership in the development of the RESJ Partnerships and Investment Strategy as well as the RFP process RESJ leadership: 1. RFP process occurred in Summer 2020. 2. All contractors will meet with OSP, OSS and principals to start the contract year and review contract deliverables. 3. Quarterly meetings to be scheduled.	Instructional Leadership: Instructional Leadership: March 2021 RESJ leadership: 1. Complete. 2. In process, fully completed by November 2020. 3. Completed by November 2020.	Instructional Leadership: RESJ leadership: 1. Completed. 2. Completed - all contractors met with school site principals, Chief of Schools and Chief of Systems Performance to discuss contract scope of work, deliverables and reporting. 3. First quarterly meeting was held November 16th. In addition to the Superintendent and Superintendent's leadership team, OSP and principals attended the meeting along with partner staff. The second will be held on February 17th and the third is scheduled for May 13th.	Instructional Leadership: RESJ leadership: On Target
20	To address the SoS audit's call for increased transparency and oversight for the District's contracts we recommend the District consider publicly posting the review and evaluation of contracts (via the Board Cover Memo) and the SOW for contracts listed on the Board agenda for Board approval. This could increase transparency in contracting decisions while still safeguarding the majority of the content related to contractor payments.	Partly Agree	Emily Courtage, Director of Purchasing & Contracting	We agree with the recommendation as it applies to large instructional, family engagement, and student services contracts and, after consultation with the Board Office, will consider including implementation actions in our implementation plan presented to the Audit Committee within 60 days.	In conjunction with the Board Office and the Deputy Superintendent of Business and Operations, we have developed a plan to publicly post, with each contracts agenda, the specialized scope of work for each student, instructional, or family engagement services contract on that agenda. In addition, because most of the Board Cover Memo content repeats the same content in the specialized scope of work document, we will no longer require completion of the Board Cover Memo for these contracts. These changes will better meet the goals of public transparency and providing the Board the information they need while reducing duplicative paperwork and burden on contract managers.	Completed as of October 1, 2020	Completed	Completed