

**Contracts Audit
Implementation Plan**

Due October 1, 2020

Signature Approvals	Date Approved
Emily Courtnage, 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
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 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.	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 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.	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 Courtnage, 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
				Instructional Leadership agrees with the recommendation and will include action steps	Instructional Leadership:	Instructional Leadership:	Instructional Leadership:	Instructional Leadership:

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	within our implementation plan presented to the Audit Committee within 60 days.	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.	March, 2021	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.	On Target			
				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.				RESJ leadership:	RESJ leadership:	RESJ 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.	1. Complete 2. Evaluation and Monitoring processes are ongoing. SPP staff assignment is complete. Evaluation development is in progress with		Completed
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	March 31, 2021		On Target			
				Purchasing & Contracting agrees with the recommendation that contract reviews and evaluations should be saved with other contract documents in a central and accessible location, and we will include implementation actions in our	RESJ Leadership:	RESJ Leadership:	RESJ Leadership:	RESJ leadership:			
								On Target			
					Instructional Leadership:	Instructional Leadership:	Instructional Leadership:	Instructional Leadership:			

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	<p>RESJ Leadership & Instructional Leadership & Emily Courtnage, Director of Purchasing & Contracting</p>	<p>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 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.</p> <p>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.</p> <p>RESJ leadership agrees with the recommendation to document contract compliance activities, however given the capacity of the respective departments has reservations about creating processes to add another layer of compliance. We do however commit to continuing to work in collaboration across departments to ensure effective contracting.</p>	<p>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.</p> <p>Emily Courtnage, Director of Purchasing & Contracting:</p> <p>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.</p>	<p>March 2021</p> <p>March 31, 2021</p>		<p>On Target</p> <p>Emily Courtnage, Director of Purchasing & Contracting:</p> <p>On Target</p>
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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	<p>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.</p> <p>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.</p> <p>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 gauge the impact of all RESJ</p>	<p>RESJ Leadership:</p> <p>1. RFP process for RESJ Contracts occurred in summer 2020. 2. Execute RESJ Partnership Contracts with appropriate deliverables, performance measures and outcomes.</p> <p>Instructional Leadership:</p> <p>Instructional Leadership: All contracts will include specific deliverables, performance measures, and expected outcomes.</p> <p>Emily Courtnage, Director of Purchasing & Contracting:</p> <p>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.</p>	<p>RESJ Leadership:</p> <p>1. Completed 2. 15 of 16 contracts executed and approved by board by October 6, 2020. Final contract to be executed by November 2020.</p> <p>Instructional Leadership:</p> <p>March 2021</p> <p>Emily Courtnage, Director of Purchasing & Contracting:</p> <p>March 31, 2021</p>	<p>RESJ Leadership:</p> <p>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.</p> <p>Instructional Leadership:</p>	<p>RESJ leadership:</p> <p>Completed</p> <p>Instructional Leadership:</p> <p>On Target</p> <p>Emily Courtnage, Director of Purchasing & Contracting:</p> <p>On Target</p>
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 measure and reporting requirements. The Executive Instructional Leadership Team (EILT) 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		Completed
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	Staff memo and proposed language clarification in Professional Conduct Policy provided to Board in advance of January 12, 2021 Board Meeting. Board approved language changes limiting contractor training requirement to those with direct, unsupervised contact with students on February 9, 2021.	On Target
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:	Legal - Mary Kane:	Legal - Mary Kane:	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.	July 1, 2021		On Target
					Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	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.	July 1, 2021		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		On Target

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:	Legal - Mary Kane:	Legal - Mary Kane:	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.	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:
						July 1, 2021		On Target

					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.	July 1, 2021		On Target
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 include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:	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.	July 1, 2021		On Target
					Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	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.	July 1, 2021		On Target
7 b)	Include the list of mandatory training courses in applicable RFPs (or ITB).	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, 6(a), 7, and 7(a) are developed.	We will include the contractor training requirements in applicable RFPs or other formal solicitations as soon as guidance is finalized.	July 1, 2021		On Target
7 c)	Consult with the Office of Technology & Information Services (OTIS) to develop a streamlined process for the activation of the necessary PPS email addresses for the contractor and their staff to access the training courses in Pepper PD.	Agree	Legal - Mary Kane	We agree with the recommendation and a process has already been implemented through the adoption of Rapid Identity, a new identity automated management system.	As noted, the District has adopted a new identity automated management system. The program will be fully implemented once the contractor training protocol is finalized.	July 1, 2021		On Target
8	8. Develop and implement internal controls that will ensure: <ul style="list-style-type: none"> Evidence of deliverables identified in the SOW are achieved/delivered, and Reports obtained by the District as evidence of deliverables include all required information, agree with District data, and all required reports are obtained (i.e. all four of the four reports are obtained). 	Agree	Instructional Leadership	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Instructional Leadership: Before a contract goes to the Board, supervisors are requiring contract managers to share the summary of the SOW.	March 2021		On Target

9	We also recommend the District management develop and implement internal controls that will ensure contract management responsibilities are being performed.	Agree	Instructional Leadership	We agree with the recommendation and will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Instructional Leadership: Before a contract goes to the Board, supervisors are requiring contract managers to share the summary of the SOW.	March 2021		On Target
10	We recommend the District develop and implement internal controls that will ensure the District has received a signed ROI form prior to releasing any student information and continue to prioritize obtaining ROI forms, until a signed ROI form is obtained for each student.	Partly Agree	Legal - Mary Kane and potentially others	We believe the appropriate next action is that the Legal Department assess how and whether ROI forms need to be used in contracts and consult with appropriate departments on development of any necessary internal controls resulting from that assessment. See 11(a), below.	General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed
11	We recommend the District perform and document an analysis of the District's obligation to secure student information from unauthorized re-disclosure under FERPA laws.	Agree	Legal - Mary Kane	We agree and believe we can implement this into our implementation plan presented to the audit committee within 60 days.	General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed
11 a)	We recommend the District consider specifically addressing each of the examples identified in the finding in its analysis.	Agree	Legal - Mary Kane	We agree and believe we can implement this into our implementation plan presented to the audit committee within 60 days.	General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed
12	We recommend the District develop a clear criteria for determining when a signed ROI form is required.	Agree	Legal - Mary Kane	We agree and believe we can implement this into our implementation plan presented to the audit committee within 60 days. See 10, above.	General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed
13	Develop and implement internal controls that will ensure the consistent application of a signed ROI form in applicable contracts.	Agree	Legal - Mary Kane and Emily Courtnage, Director of Purchasing & Contracting	We agree that contract managers need clear guidance on when to include the requirement of signed ROIs in their contracts. We will include implementation actions in our implementation plan presented to the Audit Committee within 60 days.	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:	Legal - Mary Kane:
					General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed
					Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:	Emily Courtnage, Director of Purchasing & Contracting:
					General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act). No action by the P&C department is required.	NA		Completed
13 a)	We recommend the District consider providing Contract Managers with training that will detail guidance and expectations to ensure they have an adequate understanding of the criteria for which a signed ROI form is required and the District's obligation to secure student information from unauthorized re-disclosure under FERPA laws.	Partly Agree	Legal - Mary Kane	We agree subject to the conclusions reached in the analysis required in 10 and 11(a), above; however, training may not be implemented within 60 days.	General Counsel's office has determined that Release of Information forms are not required because the contractors' responsibilities are covered as "school officials" for purposes of FERPA (Family Educational Rights and Privacy Act).	NA		Completed

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.			On Target
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.			On Target
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.	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: On Target 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:	Instructional Leadership: Completed RESJ leadership: Completed
	We recommend the District take additional steps to implement a comprehensive and systematic approach to improve performance management of personal service			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	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:	Instructional Leadership: Instructional Leadership: March 2021 RESJ leadership:	Instructional Leadership: RESJ leadership:	Instructional Leadership: On Target RESJ leadership:

19	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	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.	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.	1. Complete. 2. In process, fully completed by November 2020. 3. Completed by November 2020.	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.	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 Courtnage, 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