

ARRA Institutional Management Response

Institution Management Response

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

1. OVERARCHING/PERFORMANCE

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

Management Response and Action Plan:

- a. Yes. The programs under the Recovery Act for Northwest-Shoals Community College (NW-SCC) follow guidance given by the Department of Postsecondary Education, the State of Alabama Governor's Office and the American Recovery & Reinvestment Act of 2009.
- b. Yes. Specific Recovery Act objectives and requirements are incorporated into NW-SCC policies by assigning staff the responsibilities of payment documentation, reporting, review, and accountability.
- c. Yes. NW-SCC has staff adequately trained to effectively implement Recovery Act requirements.
- d. No. NW-SCC has no sub-recipients.
- e. Yes. NW-SCC discloses all transactions online at <http://nwscce.edu/fiscaldisclosure.html>.
- f. Yes. NW-SCC has an agency-wide methodology for measuring the performance of

grants and contracts. The key performance metrics comply with provisions of the Act.

- g. Yes. The metrics are primarily outcome-oriented- Act funds providing supplemental funding to retain employees.
- h. Yes. NW-SCC is subject to Alabama State Law governing audits of financial and legal compliance. NW-SCC has policies and procedures implemented to resolve audit findings if they occur.
- i. Yes. The State of Alabama Board of Education governs NW-SCC through the oversight of the Department of Postsecondary Education.

2. **REPORTING**

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

Management Response and Action Plan:

- a. Yes. NW-SCC established policies and procedures to comply with reporting requirements of the Act.
- b. Yes. NW-SCC posts financial information on the college's website <http://nwscce.edu/fiscaldisclosure.html> as required by state law. Act information is reported at <http://www.nwscce.edu/businessoffice.html>.
- c. Yes. The CEO, CFO, CO, and appropriate support staff review the information prior to submission.
- d. Yes. NW-SCC established policies and procedures to ensure reports are accurate and data fields are complete. Reports are completed from general ledger accounts.
- e. Yes. NW-SCC management reviews reports of current information on a timely basis.
- f. Yes. Policies and procedures are established to address on a timely basis issues identified through management reviews of established reports.
- g. Yes. NW-SCC reports the effectiveness of risk management strategies and tactics timely. Audits of risk management strategies are performed by the Internal Audit Division of the

State of Alabama Department of Postsecondary Education.

- h. Yes. Risk management strategies and tactics are properly monitored with internal control policies and procedures in addition to audits by the Internal Audit Division of the State of Alabama Department of Postsecondary Education.

1. HUMAN CAPITAL

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

Management Response and Action Plan:

- a. Yes. The CEO, Humphrey Lee; CFO, Paul Merrill; CO, Janet Jones; and appropriate business office support staff, Amy Hester and Sandra Jackson, are qualified to oversee Recovery Act Funds.
- b. Yes. NW-SCC has a sufficient level of personnel within the Fiscal Affairs Office to manage Recovery Act Programs.
- c. Yes. Personnel assigned to Act performance and reporting are empowered to make decisions within the internal control policy and procedure framework of the institution as authorized by the CEO.
- d. Yes. Program officials participate in adequate, on-going training in the performance of management requirements of the Act.
- e. Yes. NW-SCC has considered the alternative hiring methods allowed under the Act within the limits and requirements of Alabama State Law.

1. ACQUISITION

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

g. Are there any performance issues identified with regards to (potential) contractor? Are there follow up actions to address the performance issues?

Management Response and Action Plan:

- a. No. NW-SCC will apply Act funds only internally to save jobs and delay increases in tuition and fees.
- b. Not applicable. NW-SCC will not award contracts with Act funds.
- c. Not applicable. NW-SCC will not award contracts with Act funds.
- d. Yes. NW-SCC complies with reporting requirements by posting Act information on the college's website at <http://nwscce.edu/fiscaldisclosure.html> and <http://www.nwscce.edu/businessoffice.html>, as well as recovery.gov.
- e. Yes. Fiscal administrators are qualified to understand and apply Act regulations and requirements to minimize and or mitigate potential fraud, waste, error, and abuse.
- f. Not applicable. NW-SCC will apply Act funds only internally.
- g. Not applicable. NW-SCC will not award contracts with Act funds.

1. FINANCIAL

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

Management Response and Action Plan:

- a. Yes. NW-SCC applies generally accepted governmental accounting standards to all transactions. Act funds are clearly distinguishable in a sub fund of self-balancing accounts.
- b. Yes. Act funds are accounted for separately and distinctly from all other institutional funds.
- c. Yes. NW-SCC is audited annually by the State of Alabama Department of Examiners of Public Accounts. The Examiners test internal controls each year as a part of their audit. NW-SCC fiscal administrators are qualified to assess internal control compliance and respond accordingly to any deficiencies.

1. SYSTEM

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

Management Response and Corrective Action Plan:

- a. Yes. NW-SCC applies generally accepted governmental accounting standards to all transactions. Act funds are clearly distinguishable in a sub fund of self-balancing accounts. Act funds are accounted for separately and distinctly from all other institutional funds. NW-SCC is audited annually by the State of Alabama Department of Examiners of Public Accounts. The Examiners test each year as a part of their audit internal controls. NW-SCC fiscal administrators are qualified to assess internal control compliance and respond accordingly to any deficiencies.
- b. Yes. Since Act funds will be used to save positions, existing operations and functions are sufficient to support Act objectives.
- c. Yes. Appropriate data elements are captured, classified, and aggregated for Act reporting using the existing accounting policies and procedures of NW-SCC.