

Appendix F

Institution Management Response

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

1. OVERARCHING/PERFORMANCE

- a. Are the programs under Recovery Act for my organization following the existing procedures or new procedures? Yes; Wallace Community College is following existing procedures and incorporating new procedures according to guidance received from the Department of Postsecondary Education (DPE) and the State of Alabama Governor's Office regarding proper procedures for the use and reporting of American Recovery and Reinvestment Act (ARRA) funds.
- b. Are specific Recovery Act fund objectives and requirements incorporated into agency policies? Yes; The Chancellor's office of Alabama Department of Postsecondary Education provided guidance for the funds including segregation of funds, Buy American requirement, Whistleblower Protections, and Wage Requirements.
- c. Does my organization have staff adequately trained to effectively implement Recovery Act requirements? Yes; The training session was attended by Lynn Bell, Kay Gamble and Ashli Boutwell on August 12, 2009. These employees are responsible for training additional staff as necessary.
- d. Has my organization provided new requirements, conditions, and guidance to the recipients regarding Recovery Act? Yes; The Chancellor's Office of DPE provided direction for reporting and implementing the requirements of the Act specific to 2-year colleges.
- e. Does my organization have reporting mechanisms in place to collect the required data from recipients to meet Recovery Act transparency requirements? Yes; Wallace Community College has a clearly defined accounting system and administrative software to collect all of the required data. The compliance officer and the business office will work together to ensure that all reports are submitted timely and accurately. Once the reports are approved by DPE, they will be uploaded to the website.
- f. Is there an agency-wide methodology for measuring performance? What are the key performance metrics? Yes; the performance metrics for the *Drop into a CNA Career* are the number of participants served and an entered employment rate of 85% within six months of completion.
- g. Are there any process metrics, or are the metrics primarily outcome-oriented? The *Drop into a CNA Career* metrics are 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? N/A; There were no audit findings in the last financial or compliance audit for the 2007

fiscal year. Should findings occur in future audits, the Internal Audit division of the Department of Postsecondary Education requires the college to respond to audit findings with a written corrective action plan to be implemented immediately.

- i. Has my organization established a governance body to oversee / manage the overall implementation of Recovery Act? Yes; The Alabama Department of Postsecondary Education along with State Finance and the Governor's Office will oversee/manage the overall implementation of the Recovery Act.

2. **REPORTING**

- a. Is the necessary reporting under Recovery Act in place? Yes; Wallace Community College has personnel assigned to report expenditures from the separate, restricted fund accounting/budget center to Department of Postsecondary Education monthly, to update the website monthly and to report quarterly via www.FederalReporting.gov.
- b. Has your organization implemented communication vehicles to ensure Recovery Act data is promptly reported on the agency's website? Yes; Communication has been directed by Department of Postsecondary Education. Web site reporting has been implemented and will be updated monthly.
- c. Are reports published under Recovery Act reviewed and approved? Yes; Reports are reviewed and approved by the Department of Postsecondary Education and other State offices.
- d. Are reports issued accurate and have the data fields required under Recovery Act? Yes; Wallace Community College's Administrative software has the appropriate data fields required to report Recovery Act funds properly.
- e. Do reports tell agency management what is happening on a timely basis? Yes; Transactions are updated on a daily basis and provide accurate and timely reports to allow monthly reporting to DPE and the website.
- f. Are issues identified through established reports addressed on a timely basis? Yes; Reports are reviewed and verified by the Compliance Officer before submitting to DPE. Any discrepancies will be corrected before final submittal.
- g. Are reports issued on the effectiveness of risk management strategies and tactics timely? Yes; The Internal Audit section of DPE will review our process and report as appropriate.
- h. Are risk management strategies and tactics properly monitored? Yes; The staff of the Department of Postsecondary Education monitors risk management strategies and tactics.

1. HUMAN CAPITAL

- a. Has my organization identified qualified personnel to oversee the Recovery Act funds? Yes; Wallace Community College has identified several key personnel to oversee Recovery Act funds: Dr. Linda Young, President, H. Lynn Bell, Dean of Business Affairs and Institution Compliance Officer, Dr. Ashli Boutwell, Director of Grants and Contracts, Kay Gamble, Director of Accounting and Finance and Institution Contact Person and Vincent Vincent, grant director.
- 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.)? Yes; In addition to the employees listed in a, Wallace Community College employs a six person Business Office staff, a five person Management Information Systems Department and a website coordinator.
- c. Are they empowered to make decisions and administer the Recovery Act programs? Yes; H. Lynn Bell is responsible for the entire business function of Wallace Community College. Kay Gamble supervises the Business Office Staff and coordinates with the website coordinator.
- d. Are program officials trained in the performance management requirements? Yes; Mr. Bell, Dr. Boutwell and Ms. Gamble all attended the training provided by DPE and all have worked with grants in the past and are familiar with performance requirements.
- e. Has my organization considered using alternative hiring methods allowed under the Recovery Act? N/A

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? N/A; Wallace Community College has no plans to subcontract these funds.
- b. Are Contracts awarded in a prompt, fair, and reasonable manner? Yes; The college's bid process ensures fair treatment of vendors and broad dissemination for competition.
- c. Do new contracts awarded using Recovery Act funds have the specific terms and clauses required? The college will formulate each contract to include the clauses and terms required under the Recovery Act.
- 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? Yes; Wallace Community College will report clearly, accurately, and timely. Report will be posted on the website to ensure transparency.

- e. Are funds used for authorized purposes and the potential for fraud, waste, error, and abuse minimized and/or mitigated? Yes; Wallace Community College will employ the same procedures that it uses for the expenditure of its own funds as well as any additional procedures to meet the requirements of the Recovery Act. The college is audited annually by the Alabama Department of Examiners of Public Accounts. The college's website displays a link for reporting fraud.
- f. Do projects funded under Recovery Act avoid unnecessary delays and cost overruns? Yes; Contract management protocol requires that projects be completed on schedule and prohibit cost overruns.
- g. Are there any performance issues identified with regards to (potential) contractor? Are there follow up actions to address the performance issues? N/A

1. FINANCIAL

- a. Has my organization established separate Treasury Account Fund Symbols to ensure Recovery Act funds are clearly distinguishable? Yes; WCC will establish a self-balancing restricted fund account for the expenditure of Recovery Act funds.
- b. Are there controls in place to ensure that Recovery Act funds are not commingled with other agency funds? Yes; By establishing a restricted fund account, WCC will ensure that Recovery Act revenues and expenditures are segregated from the college's other funds.
- c. Are existing internal controls sufficient to mitigate the risks of fraud, waste, and abuse? Yes; Wallace Community College enforces separation of duties to ensure proper control of funds. The Internal Audit division of the Department of Postsecondary Education reviews the colleges for compliance.

1. SYSTEM

- a. Are financial and operational systems configured to manage and control recovery funds? Yes; Administrative software allows separate budget and financial reporting of Recovery Act funds. WCC has operational systems in place to manage its existing grants and plans to employ similar operational management techniques.
- b. Can financial and operational systems support the increase in volume of contracts, grants and loans etc.? Yes; The financial and operational systems should be able to easily manage the increased volume of work associated with the funds.
- c. Are the appropriate data elements identified that must be captured, classified and aggregated for analysis and reporting to meet Recovery Act requirements? Yes; Many of the sub-recipient data elements are informational and readily available. Revenues and expenditures will be captured, classified and aggregated utilizing WCC's administrative software system.