

GEER Administration Review & Advise

Interim Status Report March 2023



Review and Advisory Services

Differences from a standard Internal Audit engagement:

- Programs are reviewed while they are being administered versus a lookback period
- Feedback is provided to management throughout the engagement
- Results are periodically summarized in interim status reports
- Reports look different
- Important guard rails are monitored throughout engagement

GEER – Impact and Accomplishments

- The CB has received federal GEER funding of approximately \$360 million from the Governor’s Office that has been allocated to more than 40 different projects.
- Funds were deployed to:
 - make strategic investments in financial aid and college advising
 - advance work to make data more useful and accessible
 - help upskill and reskill displaced workers
 - support institutions in expanding access to credentials that translate into real value for students, their families, and our state.

Review & Advisory Process March 2023

We conducted the following survey of information and activities:

- Reviewed contents of GEER folder in designated location on agency network.
 - Reviewed available documentation from GEER project folders.
 - Compiled status of project documentation by each program.
- Verified if Contract Management Checklists were completed and exist in BMS and in designated location on agency network.
- Discussed and shared overall status and impediments to compliance monitoring and documentation with various staff.

Issues and Challenges March 2023

1. Limited centralized monitoring exists to provide oversight for service (non-subrecipient) GEER projects.
2. Completed Contract Management Checklists did not exist in BMS or in designated location on agency network for four of five contracts tested.
3. Subrecipient Monitoring Checklists did not exist in designated location on agency network for 3 of 36 GEER I and 8 of 15 GEER II folders reviewed.
4. Folder structure and naming convention of files in designated location on the agency network varies from management's Smartsheet list with 7 of 36 GEER I and 4 of 15 GEER II programs not having matching program folder names. Three projects have multiple PCA numbers. Nine PCA numbers have more than one project.
5. No Charters existed in the designated location on the agency network for 16 of 36 GEER I and 2 of 15 GEER II projects reviewed. Charters were in draft form yet to be fully finalized and approved for 15 GEER I and 6 GEER II projects.

Recommendations March 2023

Promote, monitor and enforce uniformity and compliance within and across divisions in the administration of federal funds.

- Ensure adequate centralized monitoring exists to provide oversight for service (non-subrecipient) GEER projects.
- Complete and retain the Contract Management Checklist in BMS and in the designated location on the agency network for each service (non-subrecipient) GEER project.
- Complete and retain the Subrecipient Monitoring Checklist in the designated location on the agency network for each grant (subrecipient) GEER project.
- Ensure that folder structure and naming convention of files in the designated location on the agency network are consistent and correlate to management's Smartsheet list and finance structure (PCA) numbering and naming.
- Finalize and document the approved Charter in the designated location on the agency network for all projects.

Management Actions In Progress March 2023

- GEER project charters are an internal best practice. For projects that do not have a charter saved on the H drive, project leads will be directed to save any other similar documentation they have (ex. a non-charter document that lists the purpose of the project).
- For GEER projects that ultimately did not receive funding or move forward, documentation will be saved on the H drive noting that.
- The agency will save a document on the H drive that documents any projects where the name changed over time and crosswalks the list of projects with the relevant PCAs.
- Agency management and GEER executive sponsors will continue to review the H drive and prioritize completion of the documentation.

Management Actions In Progress March 2023- Continued

- All GEER II projects and PCAs will retain alignment over the course of the fiscal year
- The agency will develop two H drive close out templates (one for grants and one for contracts) that project leads can complete when they have finalized all of their documentation. This will be saved in the folder as the final close out step.

Appendix I: Review & Advisory Process (March 2022)

We conducted the following survey of information and activities:

- Reviewed contents of GEER folder in designated location on agency network.
 - Compared information from GEER leads smartsheet project list to designated location on agency network contents.
 - Compiled status listing by project of Charters, Subrecipient Risk Assessments and Subrecipient Monitoring Plans.
- Verified if Contract Management Checklist exists in BMS and in designated location on agency network.
- Requested and collected information from GEER project leads.
- Reviewed and suggested revisions to Federal Subaward Management Checklist.
- Discussed overall status and impediments to compliance monitoring and documentation with various staff.
- Shared our preliminary information with various stakeholders for feedback

Appendix II: Examples of Issues and Challenges (March 2022)

1. The agency shared drive dedicated for GEER funds, does not have folders for each project. Readily identifiable folders were not noted for some of the 26 projects on the shared drive GEER folder. The folders are not named in a way to readily match each GEER project with its associated folder.
2. The charters, which are a significant communication tool identified to bridge the decentralized structure, lack clarity regarding the role, requirements, and purpose. Minimal information exists on what additional documentation may be needed or required, both initially and for continuing communication, after an initial charter is drafted or in place of a charter where none exists.
3. Appendix I shows updated project information for key activities and milestones. Improvement has occurred since December 2021 for these metrics. For example, nine out of 26 Charters were missing in December, now we have drafts or final versions for all 26; we had no responses for five of the 26 projects for expected timelines for risk assessments and subrecipient monitoring plans, we now have responses for all projects.

Appendix III: Recommendations (March 2022)

Texas Higher Education Coordinating Board needs additional coordination and implementation resources to promote uniformity and compliance within and across divisions in the administration of federal funds.

- Additional resources have recently been assigned to coordinate and assist the GEER project leads, but more will likely be necessary.
- Executive management needs to monitor overall project timeliness, including project completion of key compliance documents, such as Project-Specific designated location on agency network Folders, Charters, Subrecipient Monitoring Plans, and Subrecipient Risk Assessments.
- The updating of the Federal Subaward Management Checklist should continue to promote better functionality while maintaining its core purposes of documenting communication and compliance with federal Uniform Grant Guidance and subrecipient monitoring.

Appendix IV: Management Actions In Progress March 2022

- Management has assigned additional resources to assist the GEER project leads to complete their assigned projects, but more will likely be necessary.
- Executive management was notified and is currently in a process to determine and monitor the timeline for finalizing key documents, such as Charters, Subrecipient Monitoring Plans, and Subrecipient Risk Assessments.
- Project leads are currently working with the newly appointed Chief Operating Officer, the new Assistant Commissioner for Strategic Implementation, and Project Management to customize the Federal Subaward Management Checklist for better functionality.
- Management has made improvements to documentation kept on network drive and continues to take effort to keeping those moving forward

Appendix V: Review & Advisory Process (October 2022)

We conducted the following survey of information and activities:

- Reviewed contents of GEER folder in designated location on agency network.
 - Reviewed available documentation from GEER project folders.
 - Compiled status of project documentation by each program.
- Provided information to management.
- Reviewed and suggested revisions to Contract Management Checklist.
- Reviewed and suggested revisions to document folders and naming of project files.
- Verified if Contract Management Checklist is completed and exists in BMS and in designated location on agency network.
- Discussed overall status and impediments to compliance monitoring and documentation with various staff.
- Shared our preliminary information with various stakeholders for feedback.
- Working towards cleanup and correcting storage of documentation in designated location on agency network.

Appendix VI: Examples of Issues and Challenges (October 2022)

1. Contract management checklist did not have clear content to ensure that it is completed, and that relevant documentation is maintained as directed. Completed Contract Management Checklist did not exist in BMS and in designated location on agency network.
2. Smartsheet checklist used in lieu of Word document checklist by some programs. Form completed in Smartsheet did not accompany documentation generated when completed.
3. Folder structure and naming convention of files in designated location on agency network varies across programs.
4. Files saved on SharePoint were not saved in designated location on agency network.

Appendix VII: Recommendations (October 2022)

Texas Higher Education Coordinating Board needs additional coordination and implementation resources to promote uniformity and compliance within and across divisions in the administration of federal funds.

- Revise and communicate the updated Contract Management Checklist to the GEER Leads.
- Complete and retain the Contract Management Checklist in BMS and in designated location on agency network.
- Create standard folders for containing documentation.
- Create naming convention to easily identify required documentation.
- Save all program documentation to designated location on agency network.

Appendix VIII: Advisory/ Services

- ▶ The IA Audit Plan, audit notifications, and updates serve as our agreement of services.
- ▶ In accordance with auditing standards, IA cannot make management decisions. For example, we cannot create policies and procedures for program staff.
- ▶ IA reserves the right to audit areas previously reviewed as advisory or nonaudit services.

Nonaudit

- ▶ Project scopes, objectives, and methodology are subject to change.
- ▶ Management assumes responsibility for addressing issues and risks.
- ▶ IA will perform follow-up verification on significant issues and risks.
- ▶ Internal Auditors have no direct operational responsibility or authority; which is covered extensively in our charter.

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**Texas Higher
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COORDINATING BOARD**

Questions?