PERALTA COMMUNITY COLLEGE DISTRICT **ITEM # 19**

Board of Trustees Agenda Report

For the Trustee Meeting Date of November 15, 2011

ITEM TITLE:

CORRECTIVE ACTION MATRIX

SPECIFIC BOARD ACTION REQUESTED:

To ratify the Corrective Action Matrix.

ITEM SUMMARY:

The Corrective Action Matrix has been and continues to be used as a management tool to document progress made towards correcting previous year audit findings and recommendations from various agencies. The matrix has been updated to reflect the status of the findings and efforts made to date towards their resolution.

BACKGROUND/ANALYSIS:

The District continues to make progress on implementing corrective action plans towards rectifying previous years' audit findings. During the fiscal year end 6/30/2009 audit 53 audit findings were identified. At the conclusion of the 6/30/2009 audit, 18 of these 53 findings were resolved and 5 new audit finding were identified, leaving 40 audit findings. The fiscal year end 6/30/2011 audit is currently underway but we believe we have corrected 25 of the remaining 40 audit findings.

ALTERNATIVES/OPTIONS:

EVALUATION AND RECOMMENDED ACTION:

SOURCE OF FUNDS (AND FISCAL/BUDGETARY IMPACT):

NONE

OTHER DEPARTMENTS IMPACTED BY THIS ACTION (E.G. INFORMATION TECHNOLOGY):

YES _____ **NO** _____

COMMENTS:

WHO WILL BE PRESENTING THIS ITEM AT THE BOARD MEETING? (COLLEGE PRESIDENT OR VICE CHANCELLOR)

Vice Chancellor Gerhard

DOCUMENT PREPARED BY:

Prepared by: _____ Date: 11/7/11
Ronald Gerhard, Vice Chancellor for Finance and Administration

DOCUMENT PRESENTED AND APPROVED BY:

Presented and approved by: _____ Date: 11/7/11
Ronald Gerhard, Vice Chancellor for Finance and Administration

FINANCE DEPARTMENT REVIEW

_X_ Finance review required _____ Finance review *not* required

If Finance review is required, determination is: _X_ Approved ___ Not Approved

If not approved, please give reason: _____

_____

Signature: _____ Date: 11/7/11
Ronald Gerhard, Vice Chancellor for Finance and Administration

GENERAL COUNSEL (Legality and Format/adherence to Education Codes):

_____ Legal review required _X_ Legal review *not* required

If Legal review is required, determination is: ___ Approved ___ Not Approved

Signature: _____ Date: _____
Thuy T. Nguyen, General Counsel

CHANCELLOR'S OFFICE APPROVAL

_X_ Approved, and Place on Agenda ___ Not Approved, but Place on Agenda

Signature: _____ Date: 11/9/11
Wise E. Allen, Chancellor

CORRECTIVE ACTION MATRIX

Updated 8/16/2011

PERALTA COMMUNITY COLLEGE DISTRICT
CORRECTIVE ACTION MATRIX
PENDING ACTIONS

Auditing/ Agency	Corrective Action	Responsibility/Point	Due Date	Status	Systematic/Source Integration
INDEPENDENT AUDIT FINDINGS					
MATERIAL WEAKNESSES FINANCIAL STATEMENT Independent Audit Finding 2010-1 DISTRICT BUDGET MONITORING	Annual Budget Prepared and Presented to Stakeholders within Statutory Time-Line – On-Going Monitoring of Budget	Responsible: PCCD Board/Chancellor Point: Vice Chancellor For Finance & Administration	September 28, 2010	The 2010-11 Budget will be presented for review and acceptance by September 28, 2010. (Refer to VTD Audit Response)	Completed. Presented and adopted at the 9/28/10 Board meeting.
2010-2 QUARTERLY FINANCIAL REPORTING	Financial Activity Calendar Provided to Board of Trustees	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	September 28, 2010	A Financial Activity Calendar will be provided to the Board of Trustees at the September Board Meeting for information (Refer to VTD Audit Response)	Completed. An annual financial activity calendar has been developed and is being taken to the Audit and Finance Committee meeting on 10/14. It will then be taken to the 10/26 Board meeting.
2010-3 OVERSIGHT AND MONITORING	Formal Comprehensive Review of the PeopleSoft Accounting System	Responsible: Vice Chancellor For Finance & Administration Point: Associate Vice Chancellor of Finance	June 30, 2011	Staff will be providing a recommendation on the time-line and approach to this corrective action. Add status of position management (Refer to VTD Audit Response)	Business process review has been conducted and items noted as critical have been identified and prioritized. Currently redesigning PeopleSoft's payroll process to align with desired business process. Updates – 5/17/2011 – the review of accounting business processes has been initiated. Once completed Finance will

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					work with IT to customize PeopleSoft to conform to these new business practices.
2010-4 CORRECTIVE ACTION PLAN	Address All Recommendations Stated in the Annual Audited Financial Report	Responsible: PCCD Board/Chancellor Point: Vice Chancellor For Finance & Administration	Upon Receipt of Audit – 30, 60, 90, 120 day Status Report to Audit Finance Committee and Board of Trustees	This Corrective Action Matrix List Each 2008-09 Audit Findings and Its Status the matrix is being used as a tool to address each of the current and prior year findings (Refer to VTD Audit Response)	Corrective action plans for prior audit findings are being implemented and continuously assessed. Status reports have been provided previously to the Audit and Finance Committees with quarterly reports currently to the Board.
2010-5 OTHER POST EMPLOYMENT BENEFITS (OPEB) BOND INVESTMENT ACTIVITIES	Receive, Review and Reconcile the Monthly Investment Activity	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	Monthly Reports to the Audit and Finance Committee and Regular Updates to the Board of Trustees	During the Month of July, the Board of Trustees and Audit and Finance Committee were provided an update on the Investment Activity (Refer to VTD Audit Response)	Beginning in the month of October, all investment accounts are being reconciled and reviewed on a monthly basis. Quarterly reports are taken to the Board beginning with the quarter ending December 2010.
2010-6 SWAP INVESTMENT ACTIVITY	Prepare, Review and Adopt Policy on Use of Interest Rate Swap Agreements	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	The VICE CHANCELLOR FOR FINANCE & ADMINISTRATION is working with new bond financial adviser in the development of appropriate policy, procedures and practices on interest rate SWAP agreements	Completed. Development of new policy, procedure, and SOP complete in January presented in February. Draft investment policy and administrative procedure to the March 15, 2011 Board meeting. 5/14/2011 – BOT

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				(Refer to VTD Audit Response)	approved Investment Policy and Administrative Procedure. SWAP policy to be developed by independent Retirement Board. In Process – At June Retirement Board, Retirement Board will revisit investment policy. To be completed by June 30, 2011 and part of a comprehensive OPEB restructure.
2010-7 CASH IN COUNTY RECONCIIATIONS 2010-8 BANK ACCOUNT RECONCIIATIONS	Cash and Bank Accounts Reconciled Monthly	Responsible: Vice Chancellor For Finance & Administration Point: Associate Vice Chancellor for Finance	June 30, 2011	The PCCD is reviewing its policy regarding cash and bank account reconciliation and is revising and implementing necessary changes (Refer to VTD Audit Response)	Completed SOP in development for formal implementation. Cash accounts currently being reconciled timely and reviewed by the Associate Vice Chancellor for Finance.
2010-9 INTERNAL AUDIT FUNCTION	Develop a Risk Assessment Program and Perform Regular Reviews of Programs, Services and Activities	Responsible: Vice Chancellor For Finance & Administration Point: Internal Auditor	June 30, 2011	The PCCD is in the hiring process of an Internal Auditor to perform risk assessment (Refer to VTD Audit	The hiring of this position is in process. To be complete by end of March. Once hired, the individual will be

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				Response)	assigned this task. Completed. Individual started April 4, 2011.
2010-10 CAPITAL ASSET ACCOUNTING	Identify and Train Personnel in Accounting of Capital Assets	Responsible: Vice Chancellor For Finance & Administration Point: Associate Vice Chancellor for Finance	June 30, 2011	The Vice Chancellor For Finance & Administration is identifying and having trained personnel in the accounting and recording of capital assets (Refer to VTD Audit Response)	Completed. Training has occurred. Implementing asset management module within PeopleSoft.
2010-11 FINANCIAL ACCOUNTING SYSTEM PROCEDURES	A Review of the Capabilities of PeopleSoft Financial Accounting Software System	Responsible: Vice Chancellor For Finance & Administration Point: Associate Vice Chancellor for Finance	June 30, 2011	Staff will be providing a recommendation on the time-line and approach to this corrective action. (Refer to VTD Audit Response)	Publishing of Monthly Variance Reports, development of additional queries and reports.
2010-12 STUDENT ENROLLMENT FEE REPORTING	Consistent Procedure for Accounting and Remittance of All Student Fees	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	The PCCD authorized a position to work between student and finance. (Refer to VTD Audit Response)	Student Analyst position has been created and an individual has been hired. Further, an Administrative Procedure has been created covering the collection and remittance of fees collected.
2010-13 WRITTEN PROCEDURE MANUALS	Written Procedure Manuals Developed for District and Business Offices	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	Procedures manuals are in process. (Refer to VTD Audit Response)	Procedures manual in process. Areas where drafts exist are Purchasing and Accounts Payable. Budget and Budget development in process.

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					Accounting procedures 5/17/2011 - 50% completed.
SIGNIFICANT DEFICIENCIES 2010-14 INFORMATION SYSTEMS	Software System Controls Reviewed & Tested by Independent Service Provider & Evaluate Adequacy	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	Vice Chancellor For Finance & Administration and Vice Chancellor of Educational Services to Evaluate the Software System Controls (Refer to VTD Audit Response)	Independent Service Provider evaluation underway.
2010-15 ACCURAL ACCOUNTS	Adequate Controls Over Year-End Closing Process. Training of District Staff on Accounting Principles	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	The PCCD will institute adequate controls and provide training to staff. (Refer to VTD Audit Response)	Completed. Training has been conducted. On-going training is being planned during the course of the fiscal year. Closing checklists have been implemented for the fiscal year ending 6/30/2010.
2010-16 LOAD BANKING	Revise Policies to Conform with Current Internal Revenue Service (IRS) Section Regulations Regarding "Load Banking".	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration and VC of HR	June 30, 2011	The PCCD is receiving annual load banking records to accrue the liability for year-end financial reporting. The PCCD policy will be modified to eliminate the employee's option of cashing out their	Analysis being conducted to determine collective bargaining implications.

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				balance in whole or in part to comply with the IRS regulations. PCCD will engage a meet and confer process. (Refer to VTD Audit Response)	
2010-17 DISASTER RECOVERY AND STRATEGIC PLANNING	Continue to Review and Implement the Draft Disaster Recovery Plan (DRP) for the Information Systems Department. DRP Should Cover all Operating Systems and be Tested Annually. DRP Should Include Procedures that Ensure Recovery and Restoration of all Systems.	Responsible: Vice Chancellor of Educational Services Point: Associate Vice Chancellor of Information Technology	June 30, 2011	The PCCD is reviewing and implementing the draft DRP. The System will be tested by June 30, 2011. The DRP will include procedures that will ensure recovery and restoration of the systems in the event of a disaster. (Refer to VTD Audit Response)	Calendar developed for routine testing of disaster recovery system. Off Campus Hosting Back up files. New infrastructure implementation is underway and will be completed by October 2011, designed to facilitate more robust, scalable, and effective disaster recovery. An external assessment is currently being conducted.
2010-18 SCHEDULE EXPENDITURES OF FEDERAL AWARDS (SEFA)/SCHEDULE OF EXPENDITURES OF STATE AWARDS (SESA)	Review Procedures and Format Over Collection of Data in the SEFA/SESA to Ensure it Includes All Required Elements	Responsible: Vice Chancellor of Finance Point: Associate Vice Chancellor of Finance	June 30, 2011	The PCCD will review its procedures and format over the collection of data to be included in the SEFA/SESA. (Refer to VTD Audit Response)	The Office of Finance is addressing all SEFA/SESA requirements.

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2010-19 COLLEGE BUSINESS OFFICE ACTIVITY	Review Guidelines for Receipt and Use of General Fund Monies Deposited within the Accounts. All Activity Reconciled and Provided in a Timely Manner. Amounts within the Trust Fund Belonging to the District Forwarded to District with a Full Reconciliation and Accounting	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	December 31, 2010	The PCCD will review the current guidelines and all activity will be reconciled in a timely manner. Trust funds will be forwarded with a reconciliation and accounting. (Refer to VTD Audit Response)	Guidelines have been developed and distributed to the campus business managers outlining timelines for forwarding funds to the District.
2010-20 ALLOWANCE FOR DOUBTFUL ACCOUNTS	The Allowance for Doubtful Accounts – Need Review and Analysis Throughout the Year – Properly Adjusted for Current Year Activities	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	On-Going	The PCCD will develop a process to analyze accounts. The PCCD is implementing a new module in the student finance system that will set up payment plans for students. (Refer to VTD Audit Response)	Payment plan program has been implemented. Additionally, the District is now participating in the State's CoTops program in effort to collect receivables. AR policies need to be developed.
2010-21 ACCOUNTING FOR EXPENSES	Review and Understand Disbursement Policies and Procedures – AP Staff Ensure Expenditures are Classified and all Documents are Present Prior to Disbursement of Funds for Payment.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	December 31, 2010	The PCCD will review and understand the disbursement policies and procedures. AP staff will ensure that expenditures are classified and all pertinent documents are present prior to disbursement of funds for payment. (Refer to VTD Audit Response)	Completed - Training materials developed with a training workshop held February 24th.

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2010-22 EMPLOYEE CONTRACTS	Employment Contracts and Salary Increases are Approved and Accepted by the Chancellor within a Week of the Employee's Acceptance	Responsible: Chancellor Point: VC of HR/Vice Chancellor For Finance & Administration	On-Going	The PCCD will ensure that employment contracts and salary increases are approved and accepted by the Chancellor within 30 days of Employee's acceptance. (Refer to VTD Audit Response)	Analysis in process.
2010-23 JOURNAL ENTRIES	Process of recording Transfers and Journal Entries Evaluated for Proper Internal Controls. Segregation of Duties with Responsibility for Review and Reconciliation Maintained at the Supervisory Level. Written Procedures Prepared on Proper Controls and Procedures.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	Written procedures will be prepared on the proper controls and procedures. Only managers and supervisors can post journal entries. (Refer to VTD Audit Response)	Budget and accounting procedures are currently being reviewed and revised.
2010-24 PAYROLL FINDING	Implementation of new procedures to strengthen internal controls over tracking, reporting, and payout of compensated absences.	Responsible: Chancellor Point: Vice Chancellor for Finance and Administration and Vice Chancellor of Human Resources	June 30, 2012	Written procedures have been prepared and are being implemented to assure future vacation payouts are paid to appropriate accounting codes. The District will be implementing Time and Labor as well as Leave Absences features within PeopleSoft to automate the process.	Procedures completed. Implementation of T&L and LA of PeopleSoft to be completed by June 30, 2012.
2010-25 STUDENT FINANCIAL	Adopt, implement, and monitor procedures that will allow for the disbursement of payments to be	Responsible: Chancellor Point: Vice Chancellor for Finance and Administration	June 30, 2012	The District will develop and implement procedures and policies	The development of procedures underway.

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AID DISBURSEMENTS	completed in a way that mitigates the risk of unauthorized disbursements and ensures that payments are properly recorded (not through the use of trust accounts).	and Vice Chancellor of Student Services		regarding all financial aid disbursements to ensure proper coding and discontinue the use of trust accounts within the financial aid disbursement process.	
2010-26 CCFS-320 ATTENDANCE REPORTING	Careful Calculation and Preparation of the CCFS-320 Attendance Reports. Documentation Reviewed and a Procedure to Cross Check and Verify the Amounts to be Reported to the Chancellor and Submission to the State.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration and VC of Educational Services	December 31, 2010 Completed	CCFS-320 Attendance Reports will be calculated and prepared carefully. Supporting documents will be carefully reviewed and a procedure to cross check and verify the amounts reported will be completed prior to submittal. (Refer to VTD Audit Response)	Cross checking through testing and confirmation with Business Intelligence Tool (BI) Completed
2010-27 CALWORKS – REPORTING	Timelines of Required Categorical Reporting must be Documented and Sent to all Program Directors – Supervisory Personnel to Ensure Reporting is Complete and Accurate. General Ledger is Posted Timely and Accurately for all Categorical Programs to Ensure Accuracy of Reporting	Responsible: Chancellor Point: Vice Chancellor of Educational Services	December 31. 2010 Completed	Documentation of categorical reporting will occur and will be forwarded to all program directors. Supervisory personnel will ensure the reporting is complete and accurate. (Refer to VTD Audit Response)	Training of staff and Vice Presidents of Student Services on accurate collection of student data Completed
2010-28 STUDENTS ACTIVELY ENROLLED	Program Written to Allow Admissions and Records Office to Identify the Rosters that has not Properly Turned in by Instructors. Admissions and Records Office Follow-Up with Instructors on	Responsible: Chancellor Point: Vice Chancellor of Educational Services, Vice Chancellor of Student Services and Vice Chancellor of Finance	December 31, 2010 Completed	Program will be written to allow Admission and Records Office to identify the rosters that have been turned in by the instructors to	Training by Staff Development Coordinator of Faculty on correct use of rosters and grade reports. Regular follow up with

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	Requirements to Identify Students who are not Enrolled.			determine completeness and accuracy. (Refer to VTD Audit Response)	instructional staff and administration on the campus. Regular reports distributed to Presidents Completed
2010-29 USE OF MATRICULATION FUND	Identify an Individual Responsible to Monitor State Compliance Issues Related to all Compliance Areas and Ensure that Deadlines are met and Reports are Accurate.	Responsible: Chancellor Point: Vice Chancellor of Educational Services and Vice Chancellor of Finance	December 31, 2010 Completed	The PCCD has identified individuals that will monitor State compliance issues related to all compliance areas and ensure that deadlines are met and reports are accurate and filed in a timely manner. In terms of internal controls, PCCD has established a reporting calendar and hired an Internal Auditor on March 15, 2011, whom will monitor and follow-up on compliance related matters. (Refer to VTD Audit Response)	Training of staff oversight by management to ensure knowledge of grants received, proper set up of grants and follow through Completed
2010-30 ENROLLMENT FEES REPORTING	Careful Preparation of the Reporting Forms for the State System's Office. Reconciliation of Amounts to be Reported to General Ledger Signed off by Supervisory Personnel Prior to	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	December 31, 2010	Care will be taken in completing the required reporting forms for the State's System's Office. Reconciliation of amounts to be reported	A financial reporting procedure being developed that calls for appropriate checks and balances. External reporting is now

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	Submitting the Documents.			to the general ledger will be signed off by supervisory personnel prior to submitting the documents. (Refer to VTD Audit Response)	reconciled with general ledger prior to signature by Vice Chancellor for Finance (i.e. 323).
2010-31 GANN LIMIT CALCULATION	Reconciliation of amounts to be reported should be signed off by supervisory personnel prior to submitting the documents.	Responsible: Chancellor Point: Vice Chancellor for Finance and Administration	June 30, 2011	The District has implemented procedures to internal controls are present to identify and correct transposition errors while preparing financial reports.	Completed. Procedures implemented.
2010-32 50% LAW CALCULATION	Job descriptions should be reviewed and clearly documented to ensure only employees with instructional duties and under the supervision of an instructor are charged to the 22XX object code which is included in the 50% Law calculation.	Responsible: Chancellor Point: Vice Chancellor for Finance & Administration	June 30, 2012	The District is reviewing its procedures over the coding and reporting of salary expenditures. These procedures will be revised to ensure expenditures for salary and benefits for employees are accurate.	Review of existing procedures are underway.

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Auditing/ Agency	Corrective Action	Responsibility/Point	Due Date	Status	Systematic/Source Integration
SINGLE AUDIT					
FEDERAL AWARDS FINDINGS MATERIAL WEAKNESSES 2010-1 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS (SEFA)	Review procedures and format over the collection of data to be included in the SEFA to ensure that it includes all required elements.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	The district is reviewing all procedures and format over the collection of data to be included in the SEFA and also review its existing format of SEFA to ensure that it includes all required elements.	The Office of Finance is addressing all SEFA requirements.
2010-2 TIME AND EFFORT REPORTING	Better Assess Compliance Risks to Better Develop Appropriate Compliance Objects and Necessary Controls	Responsible: Chancellor Point: Vice Chancellor of Educational Services	December 31, 2010 Completed	The PCCD will assess the compliance risks to better develop appropriate compliance objectives and necessary controls. (Refer to VTD Audit Response)	Time and effort to be accurately recorded Completed
2010-3 FINANCIAL REPORTING	Develop and Monitor Reporting Calendar to Document Timelines. Verify Actual Costs Recorded in the Financial System.	Responsible: Chancellor Point: Vice Chancellor of Educational Services	December 31, 2010 Completed	Reporting Calendar will be used to document timelines and monitor reporting timelines. Reports will be reviewed to verify actual costs are recorded in the financial system. (Refer to VTD Audit Response)	Accurate reporting of salary and benefits Distribution of Monthly Expense Reports (MERs) Correct accounting of labor and benefits Correct accounting and coding of Pro-Rata pay

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Auditing/ Agency	Corrective Action	Responsibility/Point	Due Date	Status	Systematic/Source Integration
					Completed
2010-4 SEPARATE ACCOUNTABILITY FOR THE AMERICAN RECOVERY AND REINVESTMENT ACT (ARRA) FUNDING	Develop separate program codes for all ARRA awards in order to ensure expenditure of funds are accounted separately from non-ARRA funds.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	The District will establish separate accounts for the accounting of all Federal ARRA funds.	The Office of Finance is addressing all ARRA requirements.
2010-5 EQUIPMENT MANAGEMENT	Physical Inventory of the Federally Purchased Equipment taken Bi-Annually – Reconciled – Written Procedures Prepared on Inventory Controls – Safeguarded and Accounted For	Responsible: Vice Chancellor of Finance Point: Purchasing Compliance Manager	June 30, 2011	Physical Inventory will be taken on a bi-annual basis and reconciled with records of purchases of the equipment. (Refer to VTD Audit Response)	A draft Board Policy and Administrative Policy has been developed that, among other things, specifically requires inventory observations on a bi-annual basis. These draft policies are currently going through the shared governance process. 2011 physical inventory scheduled with American Appraisal in June 2011.
2010-6 PROCUREMENT, SUSPENSION, AND DEBARMENT	Verify Entities Contracted with for Services are not Suspended or Debarred	Responsible: Chancellor Point: Vice Chancellor of Educational Services and Purchasing Compliance Manager	December 31, 2010 Completed and continually	The PCCD has monitored the grant sub recipients for compliance with program performance	MOU's are kept up to date, Vice Chancellor of Educational Services will oversee grants and ensure reporting compliance

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			updated	since December 2009. Signed MOUs have been received from the five campuses that participated in the Tech-Prep grant. Time and effort verification has been completed for all district-wide awards. (Refer to VTD Audit Response)	Completed
2010-7 DIRECT LOANS	Implement procedures to ensure that the School Account Statement data file and the Loan Detail records per the COD are reconciled to Merritt College's financial records.	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration	June 30, 2011	With the migration to Federal Direct Loans (DL) the Financial Aid SAFE system is now the method for DL reconciliation; no outside mechanism is currently used; DL originations are submitted through SAFE, origination records are accepted, funds are disbursed through SAFE and reconciled directly to COD via FTP of SAFE DL files.	Completed
2010-8 RETURN TO TITLE IV	Accounting Policies Developed – Uniform Calculation Procedures – Routine Timelines – Reports Run in a Timely Manner and Provide Evidence that all Withdrawn	Responsible: Chancellor Point: Vice Chancellor For Finance & Administration and Vice Chancellor of Student Services	June 30, 2011	Accounting policies will be developed to provide uniform calculation procedures for each of the colleges.	An accounting policies and procedures manual is in the process of being developed.

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	Students are Identified and a Calculation Performed			Records will include support that the reports are run in a timely manner. (Refer to VTD Audit Response)	
2010-9 FEDERAL DRAW DOWNS	Adopt a Policy that Determines Procedures for drawing Down Federal Funds. Implement a Control to Ensure Proper Segregation of Duties over Drawing Down Funds and Verify Amount is Reviewed and Approved	Responsible: Chancellor Point: Vice Chancellor of Student Services and Associate Vice Chancellor of Finance	December 31, 2010 Completed	The PCCD will adopt a policy/administrative regulation that determine the procedures for drawing down Federal funds. A control will be implemented to ensure segregation of duties. Amounts will be reviewed and approved. (Refer to VTD Audit Response)	Policy in development calling for drawdowns no less than quarterly.