

Bond Performance Audit Recommendation Implementation Plan

Bond Performance Audit Recommendations				Implementation Plan		Status Updates	
Year Report Issued - Recommendation Number / Bond Program / Audit Year	Abbreviated Recommendation	Response	Responsible Administrator / Manager	Implementation Plan (Specific steps to be implemented)	Anticipated date implementation will be complete (generally expected within 6 months)	Status update as of 12/16/2024	Status update as of 07/23/2025
Year 1 Ph 2 - #7 2017 Bond Year 2018-2019	Formally communicate, clarify and train OSM project teams and individuals involved with project delivery on existing document management protocols including requirements and expectations for usage.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Distribute PPS computers to contracted staff and require that all PPS work be performed on PPS devices using PPS document management systems (complete) - Gather list of common documents generated during OSM projects (complete) - Develop folder structures in eBuilder, X: drive, and Google Drive, and determine standard locations for all common documents (complete) - Develop template folder with standard sub-folder structure that can be copied for new projects (complete) - Develop training materials and deliver training to OSM staff and contractors (complete) 	Complete	Behind Schedule	Complete
Year 2 - #7 2017 Bond Year 2019-2020	Conduct a post-project completion analysis for the Madison and Lincoln High School projects to evaluate benefits and challenges of the CM/GC delivery method overall, as well as specific aspects such as timing of Guaranteed Maximum Price (GMP) contract amendments, and make process changes as warranted. The evaluation should consider components suggested by ORS279.103 and provide a comparison of actual project cost against original project estimates, change order number, value and type, as well as descriptions of success and failures during design and construction. <i>Note: The ORS section that describes post project evaluations and is referenced in PPS contracting rules is ORS 279C.355, not ORS 279.103.</i>	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Gather examples of ORS 279C.355 compliant post-project evaluations for CM/GC projects completed by other contracting agencies (complete) - Develop post-project evaluation template for CM/GC projects - Gather "Findings in Support of Alternative Contracting Methodology" documents for Lincoln and McDaniel (Formerly Madison) (complete) - Gather applicable data from eBuilder (complete) - Analyze data, write narratives, and assemble reports (LHS complete, MHS in progress) - Deliver reports to the Contract Review Board 	August 2025	Behind Schedule	Behind Schedule
Year 2 - #10 2017 Bond FY 2019-2020	Address inconsistencies between the contract for architect/engineer services and the CM/GC contract for construction services related to the timing of reconciled cost estimates for future projects by ensuring that the same deliverable milestones are included in both contracts.	Concur	Marina Cresswell, Sr. Director, School Modernization	<i>Recommendation is being re-evaluated following Year 6 Audit in which auditor noted: "PPS considered this recommendation completed; however, recently executed contracts do not have that change made; as such, auditors consider this recommendation to still be outstanding."</i>	TBD - Prioritizing this implementation with Year 6 Recommendations	Complete	Behind Schedule
Year 3 - #1 2017 Bond Year 2020-2021	The PPS Board should revisit its Equity in Public Purchasing and Contracting ("EPPC") Policy to clarify and define the District's vision, goals, and commitment to business equity. This should include reassessing the overall intent, determining how equity is characterized, and expanding on what attainment of business equity goals for the District should entail.	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Identify responsible administrator / manager for liaising with the Board's Policy Committee Policy - OSM collaborate with Policy Committee Staff Liaison to develop proposed workplan and inputs into Board Policy Committee consideration of this recommendation 	TBD - Prioritizing this implementation with Year 6 Recommendations	Behind Schedule	Behind Schedule

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Year 3 - #2 2017 Bond Year 2020-2021	Further develop the Board's overarching vision into more succinct measurable subgoals or objectives, support new goal setting defensible data, and define qualitative and quantitative metrics to measure against new goals.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Recommendation #1 is implemented as a prerequisite to implementing recommendation #2 - Staff identify new potential focus areas in reporting on EPPC goals and develop new reports and reporting processes 	TBD - Prioritizing this implementation with Year 6 Recommendations	Behind Schedule	Behind Schedule
Year 3 - #3 2017 Bond Year 2020-2021	Conduct a cost-benefit analysis of available business equity strategies, such as those outlined in this report, and include considerations such as long-term versus short-term strategies, direct versus intangible "investment" type strategies, and unintended consequences.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Create a central, living document in OSM in which to analyze cost/benefit of business equity strategies (complete) - Assemble list of available business equity strategies (complete) - Calculate/narrate quantitative and qualitative costs and benefits of available strategies (complete) - In EPPC Annual Reporting SOP, add requirement to analyze cost-benefit of new business equity strategies under consideration, publish SOP (complete) 	Complete	Behind Schedule	Complete
Year 3 - #4 2017 Bond Year 2020-2021	Develop tools and protocols to capture outcomes of chosen equity strategies, and validate outcome data accuracy.	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Create a central, living document to capture outcomes of chosen equity strategies alongside cost/benefit analysis (complete) - Define what outcomes will be measured and measurement methods for chosen strategies - Define roles and responsibilities for measuring and documenting outcomes 	TBD - Prioritizing this implementation with Year 6 Recommendations	Behind Schedule	Behind Schedule
Year 3 - #5 2017 Bond Year 2020-2021	Create protocols to expand on existing business equity annual reporting to include an assessment of whether annual equity outcomes realized meet the intent of the EPPC Policy and goals of the Administrative Directive, or if modification to the portfolio of equity strategies is warranted, and based on results, adjust strategies as necessary.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Develop Standard Operating Procedure (SOP) for an annual review and reporting of business equity strategies. Reporting to include assessment of strategies in place during the previous year, potential changes or new strategies, cost-benefit analyses for use in selection of the strategies in the upcoming year, and outcome data over the course of the year. Publish SOP. - Develop annual report template to encourage consistency across annual reports 	September 2025	Behind Schedule	Behind Schedule
Year 4 - #1 2017 / 2020 Bond Year 2021-2022	Complete development of and memorialize policies, procedures, and e-Builder processes related to construction closeout as well as train project staff on new closeout protocols before the remaining 2017 Bond projects are completed.	Concur with comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Gather requirements and design project closeout workflow, step actors, required documents (complete) - Develop document templates (complete) - Develop eBuilder project closeout process (complete) - Develop training materials, conduct training with staff (complete) - Identify pilot projects and execute pilot (complete) - Make adjustments following pilot project (complete) - Go live with project closeout process for all projects (complete) 	Complete	Behind Schedule	Complete
Year 4 - #2 2017 / 2020 Bond Year 2021-2022	Develop protocols for regularly identifying, reviewing and assessing workforce equity strategies on a designated timeline.	Concur	Stormy Shanks, Sr. Director, School Modernization	Integrate an annual review of workforce equity strategies into the broader annual report developed in response to the 2021 Audit Recommendation #5. (complete)	Complete	Behind Schedule	Complete

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Year 4 - #3 2017 / 2020 Bond Year 2021-2022	Clarify the Workforce Equity Administrative Directive protocols for whether workforce equity outcomes and progress should be measured and reported in aggregate or disaggregated by each apprenticeable trade.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Review the existing Workforce Equity AD and history of staff memos that led up to it to understand more about the original intent of the AD - Analyze the value of different methodologies in reporting workforce equity outcomes and make decisions about how to report going forward - Update reporting templates and publishing methods if justified 	TBD - Prioritizing this implementation with Year 6 Recommendations	Behind Schedule	Behind Schedule
Year 4 - #4 2017 / 2020 Bond Year 2021-2022	Conduct a review of workforce equity program specifications and analyze whether existing rules could be enhanced to benefit intended target audiences.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Thoroughly review and understand the City of Portland's workforce equity program specifications and rules (PPS contracts with the City to administer the workforce equity program compliance according to their pre-existing program specifications and rules) - Determine whether there's value in customizing the rules for PPS to better align with PPS workforce equity goals. 	TBD - Prioritizing this implementation with Year 6 Recommendations	Behind Schedule	Behind Schedule
Year 4 - #5 2017 / 2020 Bond Year 2021-2022	Continue in-progress efforts to revisit the types of key performance indicators it should track and report on that best align with PPS overall objectives and Bond project objectives.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Develop KPIs that are meaningful, measurable with existing data, and aligned with Bond project objectives - Develop standard templates for reporting KPIs - Develop eBuilder Reports and spreadsheet tools for automating KPI reporting where possible - Assign roles, responsibilities, and expectations around KPIs - Define audience, publishing method, and reporting frequency as well as set frequency of evaluating the usefulness/value of KPIs 	December 2025	Behind Schedule	Behind Schedule
Year 4 - #6 2017 / 2020 Bond Year 2021-2022	Require general contractors to consistently report specific safety performance data to OSM.	Concur	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Update the Project Status Update process in eBuilder to add required safety performance data fields - Develop and deliver training to project management staff - Update contracts to require contractors to report on standard safety metrics at regular intervals 	October 2025	Behind Schedule	Behind Schedule
Year 4 - #7 2020 Bond Year 2021-2022	Establish a formal framework for CBSE management and staffing with clear roles and responsibilities with defined authority and accountability.	Concur	Nichole Watson, Director, CBSE			Behind Schedule	Behind Schedule
Year 4 - #8 2020 Bond Year 2021-2022	Update existing CBSE implementation schedule with realistic dates, interim milestones or progress targets, general tasks and activities, and plans to get CBSE back on track.	Concur with comment	Nichole Watson, Director, CBSE			Behind Schedule	Behind Schedule

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Year 4 - #9 2020 Bond Year 2021-2022	Work with key PPS departments to put a general CBSE implementation plan in place and ensure a quick start for capital purchases or capital building as soon as CBSE concepts and goals are solidified.	Concur	Nichole Watson, Director, CBSE Stormy Shanks, Sr. Director, School Modernization Dana White, Sr. Director, Real Estate and Construction	-		Behind Schedule	Behind Schedule
Year 4 - #10 2020 Bond Year 2021-2022	Create CBSE project management plans and structure to identify general tasks and monitoring mechanisms to set, track, and report on baseline and revised schedules, original and revised budgets, and progress toward meeting delivery goals.	Concur with comment	Nichole Watson, Director, CBSE			Behind Schedule	Behind Schedule
Year 5 - #1 2020 Bond Year 2022-2023	Research and assign resources needed to implement a structured Career Learning Equity Program that has clearly designated roles and responsibilities, protocols for coordination, contractor and consultant management, data management and reporting, and set targets to track outcomes.	Concur with comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Develop clear processes for contractors to coordinate with OSM at contract execution - the supply side of career opportunities (complete) - Update procurement and contract documents to define the required career learning processes for contractors (complete) - Work in collaboration with Academic Programs/CTE to develop a standard process for connecting CTE teachers and staff (demand side of career learning) with the opportunities offered by contractors for career learning (supply side of career learning). - Identify responsible administrator / manager in Teaching and Learning organization to manage the demand side of career learning program. - Develop tools for managing data and measuring contractor compliance, and outcome metrics around career learning events delivered 	December 2025	Behind Schedule	Behind Schedule
Year 5 - #2 2020 Bond Year 2022-2023	Alternatively, PPS should revise the Administrative Directive to limit the scope of the Career Learning Program to align with the district's capacity more appropriately.	Concur with comment	Emily Courtnage, Director, Purchasing and Contracting	Update the Administrative Directive: <ul style="list-style-type: none"> - Remove reference to "Partner Connect" system no longer in use by PPS (complete) - Raise the dollar thresholds at which the AD applies to focus on larger, longer term contracts (complete) - Exclude small dollar, short-term contracts – often completed over the summer when school buildings are empty – where it has been difficult to obtain any meaningful student involvement (complete) 	Complete	Behind Schedule	Complete

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Year 6 - #1 2020 Bond Year 2023 - 2024	Perform a post-mortem on the Benson Polytechnic High School project now before the remaining high school modernization projects go through the GMP process and start construction. Memorialize discussion and action plans to mitigate similar issues on future projects in writing. (Auditor Prioritization: High)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	In development			On Target
Year 6 - #2 2020 Bond Year 2023 - 2024	Clarify and memorialize contract expectations, terms, and conditions in the CMGC agreement and GMP amendment identified based on the Benson Polytechnic High School post-mortem for the remaining high school modernization projects at Cleveland, Ida B. Wells, and Jefferson High Schools as well as at future school projects before any PPS executes any new CMGC contracts and GMP amendments. (Auditor Prioritization: High)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - OSM gather feedback from construction auditor, construction managers, and Directors of Construction about clarifying CM/GC contract terms to clarify based on lessons learned and past project audits. (Complete) - Complete CM/GC contract edits with reviews and approvals by P&C and construction legal counsel. (Complete) - Publish updated CM/GC contract and general conditions templates (Complete) - Following Benson post-mortem, complete the exercise again with new lessons learned. 	July 2026		On Target
Year 6 - #3 2020 Bond Year 2023 - 2024	Set expectations early with future CMGC contractors before construction starts to ensure a shared understanding and interpretation of key contract provisions and strengthen the enforcement of contract provisions with support from legal staff including tracking communications with external contractors related to contract enforcement. (Auditor Prioritization: High)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	In development			On Target
Year 6 - #4 2020 Bond Year 2023 - 2024	Establish and complete formal contractor evaluations based on project performance and contract compliance that are discussed with the contractor being evaluated. (Auditor Prioritization: Medium)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	<ul style="list-style-type: none"> - Develop contractor evaluation criteria (Complete) - Develop eBuilder process for completing contractor evaluation (Complete - Contract Closeout Process) - Create SOP requiring meeting with prime construction contractors to review evaluation formally. 	December 2025		On Target
Year 6 - #5 2020 Bond Year 2023 - 2024	Develop and formalize a written plan or methodology for allocating bond contingency funds including identifying how project savings will be assigned to other bond projects or returned to the 2017 program contingency fund. (Auditor Prioritization: Medium)	Concur	Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target

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Year 6 - #6 2020 Bond Year 2023 - 2024	More clearly communicate those significant project design features that are above minimum Ed Specs or design standards for modernization projects—at Cleveland, Ida B. Wells, and Jefferson High Schools if decisions have not yet been made on those projects as well as on any future school modernizations—including, but not limited to, square footage, capacity, optional spaces, sustainability features, and significant above minimum criteria materials. (Auditor Prioritization: Medium)	Completed	Stormy Shanks, Sr. Director, School Modernization	This recommendation has been completed. The April 22, 2025 Board meeting materials (https://meetings.boardbook.org/Public/Agenda/915?meeting=684707) included a comparison of Ed Spec program areas to Jefferson, Ida B Wells, Cleveland, and Lincoln High Schools. Presentations and materials were also provided related to the High School Modernization cost reductions, features, and design changes at the March 18, 2025, and April 8, 2025, Board meetings.	Complete		Complete
Year 6 - #7 2020 Bond Year 2023 - 2024	Make clear and transparent recommendations to the Board based on current cost reduction options considering tradeoffs between scope and costs in addition to any offsetting cost increases due to the project pause for the Board to make informed decisions on school modernization projects—at Cleveland, Ida B. Wells, and Jefferson High Schools if decisions have not yet been made and any future school modernizations. (Auditor Prioritization: High)	Completed	Stormy Shanks, Sr. Director, School Modernization	This recommendation is complete to the extent that it will be completed for the current modernization projects. Materials and presentations were provided to the Board at meetings on March 18, April 8, and April 22, 2025, that responded to those requirements.	Complete		Complete
Year 6 - #8 2020 Bond Year 2023 - 2024	Use OSM's external project-specific construction auditor to conduct detailed work testing the accuracy and reasonableness of the CMGCs' and subcontractors' proposed labor burden rate calculations in addition to general conditions/general requirements costs for the school modernizations against source documents to identify potential savings prior to PPS's acceptance of GMP pricing and contract amendment execution for Cleveland, Ida B. Well, and Jefferson High Schools. (Auditor Prioritization: High)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	In development	July 2026		On Target
Year 6 - #9 2020 Bond Year 2023 - 2024	Regularly update the Board on significant projected changes (and reasons for the changes) in project scope, schedule, or cost estimates as in-progress and future projects are designed and built to enhance transparency, in addition to capturing impacts and risks resulting from the projected variances and recommended actions to mitigate. This would include tracking and memorializing rationale behind board direction to PPS on the significant cost changes for the modernization projects at Cleveland, Ida B. Wells, and Jefferson High Schools when weighing future decisions. (Auditor Prioritization: Medium)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target

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Year 6 - #10 2020 Bond Year 2023 - 2024	Accelerate decisions regarding the CBSE to make more immediate progress and communicate concrete plans and timelines to the Board, or revisit initial bond pledges. (Auditor Prioritization: High)	Concur with Comment	Nichole Watson, Director, CBSE Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target
Year 6 - #11 2020 Bond Year 2023 - 2024	Develop an approach to formally estimate and document bond workload that would involve identifying task categories to be used as part of workload (perhaps using OSM's existing responsibility matrix as a baseline) and assigning durations of time expected to complete tasks. (Auditor Prioritization: Medium)	Nonconcur	N/A	N/A	N/A		
Year 6 - #12 2020 Bond Year 2023 - 2024	Require bond-funded staff to use time sheets tracking time against the proposed predetermined task category levels. At a minimum, require timesheets for staff paid for with bond funds that spend less than 100 percent of their time on bond work or conduct regular time studies with documentation to ensure the allocation of bond and non-bond effort is appropriately supported and aligned with funds used to pay staff. (Auditor Prioritization: Medium)	Partially Concur with Comment	OSM, OTIS, HR, Finance, OTL	In development	December 2025		On Target
Year 6 - #13 2020 Bond Year 2023 - 2024	Compare staffing capacity with estimated bond workload to identify gaps and determine whether staff are under-utilized or over-utilized and not able to complete the bond work needed. (Auditor Prioritization: Medium)	Concur	Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target
Year 6 - #14 2020 Bond Year 2023 - 2024	Work with the Board to define the purpose and responsibility of the SFIOC and set/clarify protocols for the committee to regularly communicate bond updates and formally make recommendations to the full Board. (Auditor Prioritization: High)	Concur with Comment	BOE SFIOC Committee Chair Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target
Year 6 - #15 2020 Bond Year 2023 - 2024	Revisit how best to use the BAC and strengthen the committee's role and involvement in oversight to enhance bond program and project delivery through BAC's technical feedback and insights on project details. This could include PPS providing the BAC with the same or similar bond data and staff analysis/memos currently provided to the SFIOC as well as other documents such as contract templates, detailed schedules with critical path, or project priority criteria for review, in addition to involving the BAC with the annual bond performance audits. (Auditor Prioritization: High)	Partially Concur with Comment	Board of Education Bond Accountability Committee	In development	TBD		On Target

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Year 6 - #16 2020 Bond Year 2023 - 2024	Provide the BAC quarterly report directly to the full Board so that members receive needed technical advice and ensure BAC reports are uploaded timely to the PPS website including establishing a timeline to publicly post the report (such as within 30 days of receipt). (Auditor Prioritization: High)	Nonconcur	N/A	N/A	N/A		
Year 6 - #17 2020 Bond Year 2023 - 2024	Provide annual bond performance audit reports and final project-specific construction reports (at least a summary of issues noted and resolution) to the BAC, SFIOC, and the Board. (Auditor Prioritization: High)	Nonconcur	N/A	N/A Note that annual performance audit reports are now being presented to the Board Audit committee and the BAC annually.	N/A		
Year 6 - #18 2020 Bond Year 2023 - 2024	Enhance staff reports for the Board and other bond oversight committees to also include a one- to two-page summary of actions needed (information only or approval), alternative and recommendations, pros and cons on recommended actions, and impacts of those recommended actions including cost, scope, and schedule. (Auditor Prioritization: Medium)	Nonconcur	N/A	N/A	N/A		
Year 6 - #19 2020 Bond Year 2023 - 2024	Work with the BAC to establish protocols for voting and formalizing any relevant recommended advice at its meetings that can be presented in BAC quarterly reports to the Board or provided in real-time by direct BAC-led presentations or OSM-led presentations to the Board. (Auditor Prioritization: Medium)	Nonconcur	N/A	N/A	N/A		
Year 6 - #20 2020 Bond Year 2023 - 2024	Ensure written BAC minutes include attendance, summaries of discussions or presentations, action items, and recommendations made as well as establish protocols to distribute meeting materials at least 12 days in advance of BAC quarterly meetings to align with distribution protocols for board meeting materials. (Auditor Prioritization: Medium)	Complete	Bond Accountability Committee Stormy Shanks, Sr. Director, School Modernization		Complete		Complete
Year 6 - #21 2020 Bond Year 2023 - 2024	Formalize the BAC recruiting and application process that is employed when a vacancy occurs or as soon as it is known a member is leaving to best retain full membership. (Auditor Prioritization: Low)	Concur	Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target
Year 6 - #22 2020 Bond Year 2023 - 2024	Create a bond project management office function outside of OSM to facilitate and coordinate bond program accountability across PPS offices with executive support for making change as needed. (Auditor Prioritization: Low)	Nonconcur	N/A	N/A	N/A		

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Year 6 - #23 2020 Bond Year 2023 - 2024	Have executive leadership take a more active role in overseeing the implementation of the annual bond performance audit recommendations, setting priorities, holding staff accountable for timely corrective action, or providing rationale if not implementing a recommendation. (High)	Concur with Comment	Stormy Shanks, Sr. Director, School Modernization	In development	December 2025		On Target