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APPEAL CASE NO. OPA-PA-26-001; Reply Memorandum

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Fri, Mar 13, 2026 at 5:02 PM

Hafa Adai Mr. Hernandez,

I was advised from Ms. Marcel at your office that we can submit to you the following for e-filing in the above matter:

1. Reply Memorandum
2. Declaration of Vince Arriola
3. Declaration of Judith Won Pat

If physical copies are preferred we can deliver on Monday.

Thank you,

Danielle



Danielle B. Tenorio-Balbas

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3 attachments

 **OPA-PA-26-001. Declaration of Vince Arriola SIGNED.pdf**
1094K

 **OPA-PA-26-001. Declaration of Judi Won Pat SIGNED.pdf**
237K

 **OPA-PA-26-001. Reply Memorandum.pdf**
1656K



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 Department of Public Works

**IN THE OFFICE OF PUBLIC ACCOUNTABILITY
 PROCUREMENT APPEAL**

In the Procurement Appeal of
GENERAL PACIFIC SERVICES, LLC,
 Appellant.

APPEAL CASE NO. OPA-PA-26-001

**DECLARATION OF JUDITH T.
 WON PAT, ED. D., IN SUPPORT OF
 REPLY MEMORANDUM RE:
 DETERMINATION OF
 SUBSTANTIAL INTEREST**

I, Judith T. Won Pat, Ed.D., declare as follows:

1. I am the Acting Superintendent of the Guam Department of Education (“GDOE”). In this role, I oversee the administration and operation of Guam’s public school system, including school facilities, staffing, student programs, and educational services. I make this declaration based on my personal knowledge and information available to me through my official duties.
2. Simon Sanchez High School serves students primarily from northern Guam, including the villages of Yigo and Dededo. For many years, the Simon Sanchez High School campus in Yigo operated in deteriorating conditions before being severely damaged by Super Typhoon Mawar in 2023. Since that time, the Simon Sanchez High School community has not had access to a permanent campus in its home village.

- 1 3. As a result of the loss of the campus, Simon Sanchez High School students have been
2 operating under a double-session arrangement with John F. Kennedy High School. Under
3 this arrangement, two high school populations share a single campus during different
4 portions of the day.
- 5 4. This double-session structure has now been in place for approximately three school years.
- 6 5. Simon Sanchez High School currently serves 1,342 students. Enrollment in recent school
7 years has been approximately 1,500 students during the 2024–2025 school year and
8 approximately 1,529 students during the 2023–2024 school year.
- 9 6. Operating two high school populations on one campus requires significant logistical
10 coordination. Students and faculty must transition between schedules, and classroom
11 access must be carefully managed so that one school's classes conclude before the other
12 school's instruction begins.
- 13 7. Under the current schedule, instructional periods extend later in the day than a traditional
14 school schedule. Classes may run until approximately 5:50 p.m., which affects the
15 availability of time for other academic and extracurricular activities.
- 16 8. The compressed instructional schedule limits students' ability to participate in programs
17 that typically occur during traditional school hours, including dual-enrollment courses,
18 career and technical education internships, and community partnership programs.
- 19 9. The shared campus arrangement also affects extracurricular activities. Simon Sanchez
20 High School athletic teams and clubs often have difficulty securing practice facilities
21 because the campus must accommodate two schools as well as other scheduled activities.
22 In some cases, extracurricular activities occur late in the evening due to limited facility
23 availability.
- 24 10. Many Simon Sanchez High School students live in northern villages such as Yigo and
25 Dededo and must travel significant distances to attend school. Students frequently rely on
26 school buses or family transportation to commute between home and the shared campus.
- 27 11. Because of the scheduling structure and extracurricular activities, some students travel
28 home after dark and do not get home until approximately 9:30pm. Many secondary roads
in northern Guam are not well lit, which raises safety concerns for students traveling
between bus stops and their homes. Students without extracurricular activities also often
get home as late as 7:00pm.
12. This late home arrive has caused increased anxiety in students, and some have taken extra
precautions to protect themselves.
13. This situation has disrupted family dynamics and caregiving responsibilities, and parental
involvement in school life has decreased since double sessions have begun.

- 1 14. The double-session arrangement also affects family logistics. Many families have limited
2 transportation resources, and some students rely on a single household vehicle or school
3 bus transportation to travel to and from school.
- 4 15. The current operational arrangement also presents challenges for teachers and staff. The
5 irregular schedule differs from traditional school hours and has made it difficult to recruit
6 and retain teachers.
- 7 16. Double sessions are currently affecting approximately 3,000 students (1342 SSHS
8 students, 1590 JFKHS students) from SSHS and JFKHS and their families, 282 faculty
9 and staff (136 from SSHS, 146 from JFKHS) and their families.
- 10 17. Instructional time has decreased under double sessions, and teacher preparation time is
11 also limited now because JFKHS teachers must leave immediately rather than preparing
12 campus and classrooms for further activities, and SSHS teachers cannot come on campus
13 early to prepare for instruction and activities.
- 14 18. Other social services that normally happen after school have been limited by double
15 session.
- 16 19. Due to double sessions, students' normal eating schedules are disrupted, going long
17 stretches without proper meals. Currently, SSHS offers breakfast *and* lunch at 12:10pm –
18 12:50pm, whereas prior to double sessions, the school would offer 600+ students lunch.
19 Now with double session, occasionally there are 400 students for breakfast and lunch.
20 This is low for the community.
- 21 20. Students struggle with late evenings for homework, impacting sleep. Students sleep much
22 later and wake up later since double sessions have started. Reduced sunlight exposure
23 affects mood and well-being.
- 24 21. Regarding meeting graduation requirements, both JFKHS and SSHS are unable to offer
25 in-person credit recovery because the campus is being used by the other community.
- 26 22. Testing schedules are broken up by double sessions, violating testing procedures and
27 breaking up testing days.
- 28 23. SSHS has lost roughly 250 students to other schools because of its half-day schedule.
- 24 24. Special Education service providers are affected by double sessions in that they have to
25 work longer hours and different hours and because services have to be done at a different
26 time, no longer during the typical 8:00am to 5:00pm time period.
- 27 25. Special Education teletherapy must also be done at abnormal hours and locations due to
28 double sessions—with services that normally are provided at school instead being
provided at home with parents due to the time difference.

- 1 26. For speech therapy, we are not able to fully utilize our teletherapy contract due to the odd
2 hours and must instead use our employed speech therapists at those double session
3 schools, which takes away from elementary speech therapists' time.
- 4 27. The double sessions in Guam schools undermines the quality and accessibility of services
5 for students with disabilities. Essential supports—such as speech therapy, occupational
6 therapy, and individualized instruction—depend on consistent, uninterrupted scheduling
7 and small-group or one-on-one attention. Splitting the school day forces related services to
8 be compressed, rescheduled, or, in some cases, reduced, directly compromising the
9 delivery of students' legally mandated Individualized Education Programs (IEPs).
- 10 28. Additionally, staffing challenges become acute, as specialists become stretched across
11 shifts, limiting their ability to provide intensive or timely interventions. The result is not
12 merely inconvenience: it significantly hinders academic progress, social-emotional
13 development, and equitable access to education, effectively placing students with special
14 needs at a systemic disadvantage compared with their peers.
- 15 29. Double sessions add considerably to GDOE's expenses because bus drivers work extra
16 which means we pay them overtime, and because the landlord is also charging GDOE
17 extra for holding double sessions.
- 18 30. Education policy researchers have studied the effects of double sessions and they have
19 found that it results in reduced academic performance, limited access to labs, libraries,
20 specialized classrooms, increases scheduling conflicts for essential courses, fewer athletics
21 and clubs, lower student engagement, reduced college readiness opportunities, longer
22 travel times for students, increased absenteeism, and higher dropout risk.
- 23 31. The temporary classrooms alone do not resolve the impacts of the delay because 20
24 classrooms are not enough to house 1,350 SSHS students.
- 25 32. Double sessions are not sustainable because of their unpredictability and because they
26 limit developmental and leadership programs, CTE internships, dual-enrollment courses,
27 job shadowing opportunities, partnerships on normal hours, homecomings, assemblies,
28 pep rallies, parent meetings, celebrations, and cultural events
33. GDOE is currently planning to relocate Simon Sanchez High School students to the Tiyan
campus as an interim operational measure intended to eliminate the current double-session
schedule.
34. Based on current planning, the Tiyan campus currently serves approximately 900 students.
If Simon Sanchez High School students are relocated there, the combined campus
population could approach approximately 2,300 students.
35. The relocation to the Tiyan campus is intended to be a temporary operational arrangement
while construction of the permanent Simon Sanchez High School facility proceeds.

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36. GDOE is also pursuing the construction of temporary classroom facilities for Simon Sanchez High School in Yigo. If those temporary facilities are completed, Simon Sanchez High School students may subsequently relocate to those temporary classrooms while the permanent Simon Sanchez High School campus is constructed.

37. The students, faculty, and families of Simon Sanchez High School have adapted to a series of temporary arrangements while awaiting the construction of a permanent school facility.

38. A campus is not a luxury. It is the foundation of the entire educational structure. Students' resilience must not be used as justification to deny them the resources, support, services, and opportunities they deserve.

39. In my judgment as Acting Superintendent of the Guam Department of Education, the timely construction of a permanent Simon Sanchez High School facility is important to restoring stable educational operations for the students and families served by that school.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: March 13, 2026



JUDITH T. WON PAT, ED.D.
Acting Superintendent of Education