

December 1, 2018

New York State Education Department  
Office of Audit Services  
89 Washington Avenue  
Room 524 EB  
Albany, NY 12234

To whom it may concern:

Below, please find the District's response to findings and recommendations of the Risk Assessment Report, which was performed by the district's internal auditors, Nawrocki Smith, LLP.

The Hicksville School District hereby submits a Corrective Action Plan for the Risk Assessment Report which is required under Section 170.12 of the Regulations of the Commissioner of Education in response to issues identified in the 2016/2017 Risk Assessment Report provided to the district by our internal auditors. Please note that the information below is intended to ensure that the district properly accounts for the findings contained in the report titled "Hicksville School District, Initial Risk Assessment Pertaining to the Internal Controls of District Operations, June 2018."

**Observation #1**

We noted that the District has not adopted an Information Security Breach and Notification Policy which should address identifying confidential information including student data, employees responsible for checking for breaches, how often inspection is to be performed and the employee to be notified in the event of such breach. This policy is required by State Technology Law §208.

**Recommendation #1**

We recommend that the District consider developing the above-mentioned policy to ensure that procedures in place are formally documented and to ensure that incidents are resolved consistently.

**Response #1**

The District has obtained an Information Security Breach and Notification Policy from NYSSBA. The Policy is being reviewed by the District's Policy Committee and, upon completion, will be forwarded to the Board of Education for their review and adoption.

**Observation #2**

It was noted that the District has not developed a formal computer controls procedure which should address segregation of duties, passwords and permissions, remote access, schedule of data backups and backup restoration testing, etc. However, it should be noted that procedures are in place that cover these areas and some of these procedures are in the process of being revised.

**Recommendation #2**

We recommend that the District consider developing a computer controls procedure to formally document the procedures currently in place. A strong procedure defines appropriate segregation of duties, password policies that are consistent for all users, schedules and documentation for backups and restoration testing, protocol for granting permissions and remote access, etc.

**Response #2**

The District will complete its revisions and formalize the Computer Controls procedure.

**Observation #3**

We noted that there were three (3) assets included in the inventory listing that were marked for disposal and one (1) inventory item in use that could not be located. In addition, we noted the asset tag for two (2) items did not match the inventory listing.

**Recommendation #3**

We recommend that the Information Technology Department perform an observation to identify equipment that is in use by the District but not included in the inventory report. This will ensure that the technology inventory report is accurate.

**Response #3**

The Technology Department will conduct an onsite inventory to identify equipment used by the District but not included in the inventory report. In addition, the District is scheduled for a formal Asset Base Inventory conducted by CBIZ in July 2019.

**Observation #4**

We noted that the District does not require users to sign an acceptable use agreement before access is granted to the network. An acceptable use agreement documents that the user understands and will comply with the terms related to use of District equipment.

We also noted that the District's applications contained active accounts for employees that were no longer with the District as follows:

- Active Directory – one hundred and twenty-nine (129) accounts
- District email – one hundred and fifty-eight (158) accounts
- IEP Direct – thirty (30) accounts

**Recommendation #4**

We recommend that the District develop a standard Acceptable Use Agreement for all users to sign before access to the network is granted. Only those users who have signed the agreement should be granted access to the system. The agreement should address staff and student responsibility, access to the system, district liability, system security, privacy, etc. This procedure may be incorporated into the hiring process. In addition, all users should sign an agreement each year to renew access. The District may consider an electronic agreement that could be automated with the log-in process.

The District should also consider developing a standard procedure for the Human Resource Department and/or Business Office to notify the Information Technology Department of user accounts that must be deactivated as a result of termination of employment, completion of a contract or other separation from the District. This will also provide formal documentation of changes and enhance the controls over the active directory.

**Response #4**

The Business Office, Personnel Office and Technology office will work together to develop an acceptable Use Agreement and Exit / Termination checklist to ensure the accounts of employees who are no longer with the District are deactivated.

**Observation #5**

We noted that the Accounting Department receives retiree health insurance contributions in the mail and records the payment into nVision. A copy of the check is forwarded to the Benefits Administrator to log into an Access database used for billing. Only the check number and amount are included in the Access database, and therefore, we could not trace payments as recorded in the Access database to cash receipts recorded in nVision.

**Recommendation #5**

We recommend that the Benefits Administrator include the nVision cash receipt numbers in the Access database to use during the reconciliation of the information to cash receipts entered into nVision. This will ensure that all insurance contributions remitted are accurately reflected in the accounting records.

Status at June 30, 2018: Not Complete. The District is in the process of reviewing procedures to implement this recommendation. NS will work with the District to assist in the implementation of this recommendation in 2018/2019.

**Response #5**

The District continues to work with the Benefits Administrator to transition out of Access and into nVision

**Observation #6**

Upon discussion, we noted that when a route includes student drop off at multiple locations, the driver will check for sleeping children at the end of the route after students are dropped off at the last location, rather than at each location.

**Recommendation #6**

While this procedure is in compliance with District policies and NYSED regulations, the District should consider a check for sleeping children after drop off at each school location to minimize disruption in the event a student remains in the vehicle after their designated drop off location. We also recommend that the Director of Transportation review routes to ensure there is sufficient time for the vehicle to be checked for sleeping children.

Status at June 30, 2018: In Process. Due to a driver strike, the District contracted with a new company to provide busing during the 2017/2018 year. The District will review policies and procedures with the new company for the 2018/2019 year.

**Response #6**

Drivers routinely check for sleeping children during their designated routes.

**Observation #7**

We noted nVision users who were no longer active employees of the District. This may increase the risk of unauthorized access to the financial management system.

**Recommendation #7**

We recommend that the District perform a review of the NVision users on at least an annual basis. This will enhance the controls over the financial management system and limit unauthorized access. The District was notified and has since inactivated the user accounts identified.

Status at June 30, 2018: Not Complete. The District is in the process of reviewing procedures to implement this recommendation. NS will work with the District to assist in the implementation of this recommendation in 2018/2019.

**Response #7**

The District will continue to implement procedures to deactivate non-active employees from nVision.

Very truly yours,

Marcy Tannenbaum  
Assistant Superintendent for Business