



**Yonkers City School District**

**Annual Risk Assessment Update  
Pertaining to the Internal Controls  
of District Operations**

**November 2024**

**INDEPENDENT ACCOUNTANTS' REPORT  
ON APPLYING AGREED-UPON PROCEDURES**

The Board of Education  
Yonkers City School District

We have performed the procedures enumerated below, which were agreed to by the Yonkers City School District (the "District"), solely to assist the District. This agreed-upon procedures engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified users of the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

We have updated our November 2023 Risk Assessment by performing certain internal audit procedures pertaining to the period starting December 1, 2023 through November 30, 2024. The updated Risk Assessment and related internal audit plan concentrates on the following key internal control areas:

- Governance and Planning
- Budget Development
- Accounting and Reporting
- Revenue and Cash Management
- Grants
- Payroll
- Human Resources
- Benefits
- Purchasing and Related Expenditures
- Facilities Maintenance
- Capital Projects
- Fixed Assets
- Food Service
- Extraclassroom Activity Fund
- Information Systems
- Cybersecurity
- Student Data Management
- Pupil Personnel Services
- Transportation
- Security and Safety
- Insurance / Risk Management

Our engagement is limited in scope and will be confined to our agreed-upon procedures. We will not be conducting an audit or review of the District's financial statements, and therefore, we will not express an opinion or any other form of assurance on them.

At the end of our engagement, we will present the results of applying the agreed-upon procedures in the form of our findings in a report. Our accountants' report should be used only for the intent of the original users of this report and will include a statement indicating that had we performed additional procedures, other matters might have come to our attention that would have been reported to you. As such, using this report for anything other than the original intent of the agreed-upon procedures could mislead the readers. You must notify us immediately if the original users of the report change.

Very truly yours,

***Nawrocki Smith LLP***  
April 9, 2025



**Yonkers City School District**

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**of District Operations**

**November 2024**

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**RISK ASSESSMENT OVERVIEW**

This Risk Assessment report provides a presentation of our view of the school district's risk pertaining to its financial operations. It gives the District's Administration the information necessary to help optimize its overall performance. The report identifies, expresses, and prioritizes the key program risks so that the District's Administration can focus on those areas most critical to its success. This analysis is used to define the District's risk profile. It will provide an overview of the risks facing the District's operations.

In accordance with the laws of New York, 2005, Chapter 263, all school districts and BOCES were required to establish an internal audit function no later than July 1, 2006 and be in operation no later than December 31, 2006. This function should include, at a minimum, the development of a risk assessment of district operations, including but not limited to the following:

- A review of financial policies, procedures, and practices.
- An annual review and update of such risk assessment.
- Annual testing and evaluation of one or more areas of the District's internal controls.
- Preparation of reports that analyze significant risk assessment findings.
- Recommended changes for strengthening controls, reducing identified risks, and specifying time frames for implementing such recommendations.

Pursuant to Section 170.12 – Regulations of the Commissioner of Education – School District Financial Accountability, each school district must prepare a corrective action plan, approved by the Board of Education in response to findings to final reports issued by the internal auditor. This plan should include expected dates of implementation and should be filed with the New York State Education Department.

**INTERNAL AUDIT OBJECTIVES**

The objectives of our engagement are as follows:

- Develop an understanding of the critical business processes of the District within each functional area.
- Identify and qualify risks based on the understanding of the business processes and stated business rules.
- Identify stated controls that are currently in place to address those risks and ascertain if they are operating effectively.
- Recommend improvements in internal controls.

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**SCOPE AND METHODOLOGY**

The Board of Education has engaged Nawrocki Smith as the District's internal auditor. In compliance with New York State Laws, we have performed an annual update to the District risk assessment with respect to policies, procedures, and internal controls pertaining to District operations. The procedures applicable to the annual update of the District's risk assessment were performed during the twelve months ending November 2024 and were carried out in order to determine an internal audit plan for the calendar year 2025 and thereafter. This risk assessment will be updated annually to reflect any changes in the current control environment and the existing internal audit plan.

Our risk assessment consisted of the following methodology:

- Perform interviews with the Administration and other appropriate personnel.
- Document procedures within key Functional Areas.
- Identify key controls and perform audit tests of those controls.
- Assess the effectiveness of the key controls.
- Identification and review of organization structure.
- Analysis of risks that are a threat to the achievement of objectives.
- Create a risk profile and internal audit plan.

In addition to the above procedures, we have also evaluated and considered the following within our overall risk assessment:

- District policies and procedures.
- Recent focus of State Comptroller Audits.
- Board of Education/Audit Committee Meetings.
- Materiality to Financial Statements.
- Changes in management or key personnel.
- Financial reports provided to the Board.
- External auditor management letters.
- District corrective action plans.
- Organizational chart and job descriptions.

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**INTERNAL AUDIT RISK ASSESSMENT UPDATE SUMMARY**

We have analyzed twenty-one (21) Business Process areas within the District and have developed an internal audit plan based on our assessment of each area. Each of the twenty-one (21) Business Processes contains multiple categories for which an extensive cycle analysis will be performed during the proposed period noted within the risk rating and internal audit plan. The plan, as presented, will be revised each year based on the annual risk assessment update and events/requests that occur during the year, which impact the priority of future internal audit services.

The results of our risk assessment update are summarized below and in the tables presented on pages 5 through 7. We have utilized a “Low,” “Moderate,” and “High” control risk rating assessment scale of the organization.

| <b><u>CURRENT YEAR RATINGS</u></b> |           |                    | <b><u>CHANGE FROM PRIOR YEAR</u></b> |                     |
|------------------------------------|-----------|--------------------|--------------------------------------|---------------------|
| <b><u>Rating</u></b>               |           | <b><u>2024</u></b> | <b><u>Category (*)</u></b>           | <b><u>Count</u></b> |
| High                               | -         | 0.00%              | “High” to “Low”                      | - 0.00%             |
| Moderate                           | 29        | 31.52%             | “High” to “Moderate”                 | 1 8.33%             |
| Low                                | 63        | 68.48%             | “Moderate” to “Low”                  | 5 41.67%            |
| <b>Total</b>                       | <b>92</b> | <b>100.00%</b>     | “Low” to “Moderate”                  | 6 50.00%            |
|                                    |           |                    | “Moderate” to “High”                 | - 0.00%             |
|                                    |           |                    | <b>Total</b>                         | <b>12 100.00%</b>   |

Our November 2024 risk assessment update contains seven (7) recommendations, as follows:

| <b><u>Business Process</u></b> | <b><u>Recommendation(s)</u></b> |
|--------------------------------|---------------------------------|
| Payroll                        | 1                               |
| Human Resources                | 1                               |
| Benefits                       | 1                               |
| Facilities Maintenance         | 1                               |
| Fixed Assets                   | 1                               |
| Food Services                  | 1                               |
| Safety & Security              | 1                               |
| <b>Total</b>                   | <b>7</b>                        |

The status of the prior year risk assessment recommendations is as follows:

|                           | <b>Completed</b> | <b>In-Process</b> | <b>Not Started</b> | <b>Total</b> |
|---------------------------|------------------|-------------------|--------------------|--------------|
| <b>PY Recommendations</b> | <b>1</b>         | <b>2</b>          | <b>-</b>           | <b>3</b>     |

Based on the work performed and discussions with the District, we have summarized below the internal audit plan for the calendar year 2025:

| <b><u>2025 Cycle Reviews:</u></b> | <b><u>Other 2025 Planned Internal Audit Services:</u></b>     |  |
|-----------------------------------|---|--|
| • Use of Vehicles Analysis        | • Key Control/Other Testing (See “T” categories on Pages 5-7) | • Payroll Cycle Recommendations Follow-Up                          |
| • Student Registration Analysis   | • External Audit Corrective Action Plan Monitoring            | • Annual Risk Assessment Update as of November 2025                |
|                                   | • Mid-Year Internal Audit Status Reports                      | • Other Internal Audit Services at the request of the District/BOE |
|                                   | • Cybersecurity NIST Gap Analysis Recommendations Follow-Up   |  |

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**Risk Rating and Internal Audit Plan**

√ = Internal Audit Services Provided  
★ = Business Cycle Review Complete

X = Proposed Business Cycle Review  
T = Proposed Key Control Testing

|   | Business Process            | Business Process Categories              | RISK     |         |      | YEAR OF SERVICE |      |            |
|---|-----------------------------|--|----------|---------|------|-----------------|------|------------|
|   |                             |  | Inherent | Control |      | Prior           | 2025 | Subsequent |
|   |                             |  |          | 2023    | 2024 |                 |      |            |
| 1 | Governance and Planning     | 1 Governance Environment                 | H        | L       | L    | √               |      | X          |
|   |                             | 2 Control Environment / Policies & Proc. | H        | M       | M    |                 |      | X          |
| 2 | Budget Development          | 3 Budget Development                     | H        | L       | L    | ★               |      |            |
|   |                             | 4 Budget Monitoring & Reporting          | H        | L       | L    | ★               |      |            |
| 3 | Accounting & Reporting      | 5 Financial Accounting and Reporting     | H        | L       | L    | √               |      | X          |
|   |                             | 6 External/Internal/Claims Auditing      | H        | L       | L    |                 |      | X          |
|   |                             | 7 Fund Balance Management                | H        | L       | L    |                 |      | X          |
| 4 | Revenue and Cash Management | 8 Real Property Tax                      | M        | L       | L    |                 |      | X          |
|   |                             | 9 State Aid                              | H        | L       | L    | √               |      | X          |
|   |                             | 10 Out of District Tuition/Reimb. Exp.   | M        | L       | L    |                 |      | X          |
|   |                             | 11 Use of Facilities                     | L        | L       | L    |                 |      | X          |
|   |                             | 12 Donations                             | M        | L       | L    |                 |      | X          |
|   |                             | 13 Vending Machines                      | H        | L       | L    | ★               |      | X          |
|   |                             | 14 Cash Receipts                         | H        | M       | M    | √               |      | X          |
|   |                             | 15 Cash & Investment Management          | H        | L       | L    |                 |      | X          |
|   |                             | 16 Petty Cash                            | L        | L       | L    |                 |      | X          |
|   |                             | 17 Bank Reconciliations                  | H        | L       | L    |                 |      | X          |
|   |                             | 18 Online Banking                        | H        | L       | L    |                 |      | X          |
|   |                             | 19 Accounts Receivable                   | H        | L       | L    | √               |      | X          |
| 5 | Grants                      | 20 General Processing                    | H        | L       | L    |                 |      | X          |
|   |                             | 21 Grant Application                     | M        | L       | L    |                 |      | X          |
|   |                             | 22 Allowable Costs & Expenditures        | H        | L       | L    | √               |      | X          |
|   |                             | 23 Monitoring                            | M        | L       | L    |                 |      | X          |
|   |                             | 24 Reporting                             | H        | L       | L    | √               |      | X          |
| 6 | Payroll                     | 25 Payroll Disbursements                 | H        | L       | L    | ★               |      |            |
|   |                             | 26 Overtime Reporting                    | H        | M       | L    | ★               |      |            |
|   |                             | 27 Payroll Accounting & Reporting        | H        | M       | L    | ★               |      |            |
|   |                             | 28 Payroll Tax Filings                   | H        | L       | L    | ★               |      |            |
|   |                             | 29 Payroll Reconciliation                | H        | M       | M    | ★               |      |            |
| 7 | Human Resources             | 30 Employment Requisition/Hiring         | H        | M       | M    | √               |      |            |
|   |                             | 31 Personnel Evaluation                  | H        | M       | M    | √               | T    |            |
|   |                             | 32 Termination                           | H        | M       | M    | √               |      |            |
|   |                             | 33 Employee Attendance                   | H        | M       | M    | ★               |      |            |

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**Risk Rating and Internal Audit Plan (Continued)**

√ = Internal Audit Services Provided  
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T = Proposed Key Control Testing

|    | Business Process                    | Business Process Categories             | RISK     |         |      | YEAR OF SERVICE |      |            |
|----|-------------------------------------|---|----------|---------|------|-----------------|------|------------|
|    |                                     |   | Inherent | Control |      | Prior           | 2025 | Subsequent |
|    |                                     |   |          | 2023    | 2024 |                 |      |            |
| 8  | Benefits                            | 34 Eligibility                          | H        | L       | L    |                 |      | X          |
|    |                                     | 35 Benefit Calculations                 | H        | L       | M    | √               | T    | X          |
|    |                                     | 36 Patient Protection & Affordable Care | H        | M       | M    |                 |      | X          |
|    |                                     | 37 Retiree Benefits                     | H        | L       | L    |                 |      | X          |
|    |                                     | 38 ERS/TRS                              | H        | L       | L    | √               |      | X          |
| 9  | Purchasing and Related Expenditures | 39 PO System & Vendor Database          | H        | M       | M    | ★               | T    |            |
|    |                                     | 40 Purchasing Process                   | H        | M       | L    | ★               |      |            |
|    |                                     | 41 Payment Processing                   | H        | L       | L    | ★               |      |            |
|    |                                     | 42 Employee Reimbursements              | H        | L       | L    | ★               |      |            |
|    |                                     | 43 Credit Cards                         | H        | L       | L    | ★               |      |            |
| 10 | Facilities Maintenance              | 44 Facilities Maintenance/Work Orders   | H        | M       | M    | √               | T    | X          |
|    |                                     | 45 Staff Supervision                    | M        | L       | L    |                 |      | X          |
|    |                                     | 46 Preventive Maintenance               | M        | M       | M    |                 |      | X          |
|    |                                     | 47 Coordination with Outside Vendors    | M        | M       | M    |                 |      | X          |
| 11 | Capital Projects                    | 48 Construction Planning & Monitoring   | H        | L       | L    |                 |      | X          |
|    |                                     | 49 Capital Project Funding & Payments   | M        | L       | L    |                 |      | X          |
|    |                                     | 50 Recordkeeping & Reporting            | M        | L       | L    |                 |      | X          |
| 12 | Fixed Assets                        | 51 Inventory/ Capitalization Policy     | H        | M       | M    |                 |      | X          |
|    |                                     | 52 Acquisition and Disposal             | H        | M       | M    |                 |      | X          |
|    |                                     | 53 Inventory Process & Recordkeeping    | H        | H       | M    | √               | T    | X          |
| 13 | Food Service                        | 54 Sales Cycle and System               | M        | L       | M    | √               | T    | X          |
|    |                                     | 55 Inventory and Purchasing             | M        | L       | L    |                 |      | X          |
|    |                                     | 56 Free & Reduced Meals                 | M        | L       | L    |                 |      | X          |
|    |                                     | 57 Federal and State Reimbursement      | H        | L       | M    | √               |      | X          |
|    |                                     | 58 Financial Reporting & Monitoring     | H        | L       | M    |                 |      | X          |
| 14 | Extraclassroom Activity Fund        | 59 General Controls                     | H        | M       | L    | ★               | T    |            |
|    |                                     | 60 Revenue                              | H        | L       | M    | ★               |      |            |
|    |                                     | 61 Expenditures                         | M        | L       | L    | ★               | T    |            |
|    |                                     | 62 Reporting                            | M        | L       | L    | ★               |      |            |



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|    | Business Process            | Business Process Categories          | Inherent | RISK |      | YEAR OF SERVICE |      |            |
|----|-----------------------------|--------------------------------------|----------|------|------|-----------------|------|------------|
|    |                             |                                      |          | 2023 | 2024 | Prior           | 2025 | Subsequent |
| 15 | Information System          | 63 Governance                        | H        | L    | L    |                 |      | X          |
|    |                             | 64 Inventory                         | H        | L    | L    |                 |      | X          |
|    |                             | 65 Network Security                  | H        | L    | L    |                 |      | X          |
|    |                             | 66 Application Security              | H        | M    | M    | √               |      | X          |
|    |                             | 67 Physical Security                 | H        | L    | L    |                 |      | X          |
|    |                             | 68 Disaster Recovery                 | H        | M    | M    | √               |      | X          |
| 16 | Cybersecurity               | 69 General Controls                  | H        | M    | M    | ★               | X    |            |
|    |                             | 70 Information & Asset Security      | H        | M    | M    | ★               |      |            |
|    |                             | 71 Vulnerability Assessment          | H        | M    | M    | ★               |      |            |
|    |                             | 72 Incident Response & Recovery      | H        | M    | M    | ★               |      |            |
| 17 | Student Data Management     | 73 Registration & Enrollment         | H        | L    | L    | ★               | X    |            |
|    |                             | 74 Student Attendance                | H        | L    | L    | ★               |      |            |
|    |                             | 75 Student Performance               | H        | L    | L    | ★               |      |            |
|    |                             | 76 Student Eligibility               | H        | L    | L    | √               |      |            |
| 18 | Pupil Personnel Services    | 77 Budgeting and Planning            | H        | L    | L    | √               |      | X          |
|    |                             | 78 STAC Reimbursement                | H        | L    | L    | √               |      | X          |
|    |                             | 79 Medicaid Reimbursement            | H        | L    | M    | ★               | T    | X          |
|    |                             | 80 RFP and Contracts                 | H        | L    | L    |                 |      | X          |
| 19 | Transportation              | 81 Fleet Inventory and Maintenance   | H        | L    | L    | ★               |      |            |
|    |                             | 82 Bus Routing and Planning          | H        | M    | L    | ★               |      |            |
|    |                             | 83 Labor and Supervision             | H        | L    | L    | ★               |      |            |
|    |                             | 84 Contract Management               | H        | M    | M    | ★               |      |            |
|    |                             | 85 Federal and State Reimbursement   | H        | L    | L    | ★               |      |            |
| 20 | Safety & Security           | 86 Plan Development & Strategy       | H        | L    | L    | √               |      | X          |
|    |                             | 87 Building Access & Security System | H        | M    | M    | √               |      | X          |
|    |                             | 88 Compliance and Incident Reporting | H        | L    | L    |                 |      | X          |
|    |                             | 89 Safety & Security Monitoring      | H        | L    | L    |                 |      | X          |
| 21 | Insurance / Risk Management | 90 General                           | H        | L    | L    |                 |      | X          |
|    |                             | 91 Policy Management                 | H        | L    | L    |                 |      | X          |
|    |                             | 92 Claims Reporting                  | H        | L    | L    |                 |      | X          |

**Inherent Risk** – Inherent risk pertains to the overall school district industry. Inherent risk is the risk of a material misstatement that may occur assuming the absence of internal controls.

**Control Risk** – Control risk pertains specifically to the Yonkers City School District. Control risk is the risk that a material misstatement will not be detected and corrected by Management's internal controls on a timely basis.

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**RISK ASSESSMENT OBSERVATIONS AND RECOMMENDATIONS**

**Current Year Risk Assessment Observations and Recommendations**

**Payroll**

1. We conducted key control testing in the area of payroll overtime disbursements made during the fiscal year 2023/2024. We compared the number of hours reported on the overtime sheets for 10 employees to the number of overtime hours reported on the payroll transaction journals. There were no exceptions. However, we noted one (1) instance where a timesheet did not contain a Supervisor's approval signature.
  - *Building Administrators and direct Supervisors should review and approve overtime sheets prior to submitting them to the Payroll Department. The Payroll Department should make efforts to review and confirm that the necessary employee, supervisor, and administrator signatures appear on all timesheets. Incomplete overtime sheets should be returned to the applicable Supervisors for further review and approval. This will assist the Payroll Department in accurately documenting the authorization of employee hours worked.*

**Human Resources**

2. We analyzed the District's employee listing and identified several active employees (e.g., Director of Special Education, Guidance Counselor, Hourly Administrators, Teachers, Substitute Teachers) whose registered residence is outside New York, (e.g., Pennsylvania, Florida, and North Carolina.) Furthermore, the District does not have a formal remote work policy or procedures allowing employees to work from out-of-state locations. The absence of a structured review process for monitoring employee residency increases the risk of unauthorized remote work and noncompliance with tax withholding and reporting requirements.
  - *To enhance oversight and compliance regarding employees with out-of-state registered addresses, we recommend the following:*
    - *The District should develop and establish a formal policy defining eligibility, approval processes, and compliance requirements for employees residing outside New York.*
    - *The Human Resources Department should review all active employees with out-of-state registered addresses. This should include verifying employment status, job responsibilities, and supporting documentation (e.g., signed contracts, performance evaluations, timesheets).*
    - *The Human Resources and Payroll Departments should collaborate to evaluate tax obligations for out-of-state employees and ensure compliance with withholding and reporting requirements.*

*This will assist the District in mitigating compliance risks and maintaining accurate payroll and residency records.*

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**Benefits**

3. The Human Resources Department does not fully utilize the ePersonality application's capabilities to automate the calculation of benefits deductions, relying instead on a manual process. Additionally, while an annual review of Medicare-enrolled individuals is conducted against an internal list, there is no formal quarterly review of individual eligibility and status, potentially increasing the risk of errors or omissions in benefits calculations during the fiscal year.
- ***The Human Resources Department should maximize the utilization of the ePersonality application to automate benefits deduction calculations. This would improve efficiency, reduce manual errors, and enhance data accuracy. Additionally, the Human Resources Department should implement a quarterly review process for Medicare-enrolled individuals against their internal list. This will assist the Human Resources Department in making timely updates to eligibility records and reduce errors in benefits administration.***

**Facilities Maintenance**

4. It was represented that the Facilities Department has a formal process of annually inspecting the completed work orders and ensuring the work was adequately and appropriately performed. However, based on our analysis of the work order report for the fiscal year 2023/2024, we noted several reporting inconsistencies, such as a substantial number of work orders had completion dates that preceded the request dates, and several work orders remained open for more than 200 days. These reporting inconsistencies increase the risk of data inaccuracy and process inefficiencies.
- ***The Facilities Department should explore the software capabilities in implementing validation controls to prevent illogical entries (e.g., completion dates preceding request dates) and develop a monthly reporting process for the building level Supervisors/Staff to submit documentation and information regarding the status of open work orders. The Facilities Director should utilize exception reports and establish a periodic review process to identify and address work orders with unusually long open statuses. This will assist the Facilities Department in improving data integrity, enhancing oversight, and investigating anomalies proactively.***

**Fixed Assets/Inventory Controls**

5. We conducted key control testing in the inventory control area. We noted that certain information technology equipment was not tagged or their inventory tags and location did not agree with the District's property ledger. While an information technology equipment inventory is maintained, the District does not maintain a comprehensive physical inventory for non-IT equipment, including furniture, machinery, etc. The District relies on manual spreadsheets and a self-reporting system where Department Heads are expected to tag and report assets. However, there is no formalized process for independent verification or follow-up to confirm compliance. The Inventory Control Staff under Infrastructure Support - Technology is not performing routine reconciliations between newly purchased assets recorded in New World and the property ledger. As a result, discrepancies in asset records may go undetected. The lack of comprehensive inventory records and oversight controls presents financial, operational, and compliance risks, including potential loss of assets.

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➤ *To enhance the oversight and accountability of fixed assets, we recommend the following:*

- *The District should establish formal asset tagging and tracking procedures requiring Department Heads to confirm asset receipt and location to the Inventory Control Staff under Infrastructure Support - Technology.*
- *The Inventory Control Staff under Infrastructure Support - Technology should conduct periodic on-site verifications and perform monthly reconciliations between newly purchased assets recorded in New World and the physical inventory records. Any discrepancies should be investigated and resolved promptly.*
- *The District should consider implementing a barcode scanning solution to improve efficiency, accuracy, and accountability.*
- *The District should assess the feasibility of re-engaging a third-party vendor to conduct physical inventories to improve accuracy and compliance.*
- *The District should determine whether physical inventory and management responsibilities should remain under the Information Technology Director or be reassigned to a centralized administrative function for broader oversight.*

*This will assist the District in strengthening its physical inventory and asset management controls and improve oversight of district-owned property.*

|               |
|---------------|
| Food Services |
|---------------|

6. We conducted key control testing in the area of food service reporting and monitoring and identified discrepancies between the number of meals recorded in the school lunch software and the number of meals reported to the New York State Education Department (NYSED) Child Nutrition Program. These reporting discrepancies increase the risk of data inaccuracies and inefficiencies in meal tracking and reporting, and noncompliance with state reporting purposes.

➤ *The District should provide training to staff responsible for entering and reconciling meal data to ensure they understand reporting requirements and system functionality. The Food Service Director should implement periodic reviews of meal counts and reports to identify and resolve discrepancies before submission to NYSED. This will assist the Food Service Department in improving the accuracy and integrity of its meal tracking and reporting processes and comply with NYSED reporting requirements.*

|                   |
|-------------------|
| Safety & Security |
|-------------------|

7. The District has not implemented a formal review process to reconcile the list of individuals with access to District buildings (as recorded in the building access security system) with the active employee list maintained in ePersonality. We conducted key control testing in the area of building access controls and noted the following reporting discrepancies:

- Several employees had building access assignments inconsistent with their building or job descriptions.
- Several employees' last names were missing from the building access database.

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- *The Human Resources Department and the Safety and Security Department should establish a semi-annual process to reconcile the cardholder listing in the building access security software with the active employee listing in ePersonality. This can be accomplished by:*

- *Comparing the cardholder database to the active employee list.*
- *Inactivating access for employees who are no longer employed by the District.*
- *Verifying cardholder records, including names and access assignments, are complete and accurate.*

*This will assist the District in strengthening controls over building access and limiting building access to active employees during school operations.*

**Status of Prior Year Recommendations**

We have performed follow-up internal audit services applicable to our previously issued risk assessment update report dated November 2023. The services we performed included observing and evaluating the implementation status of the District's action plan in respect to our prior year's risk assessment recommendations. The November 2023 risk assessment update identified three (3) recommendations within two (2) distinct areas. The status of the prior year risk assessment recommendations is as follows:

| <b><u>Business Process</u></b>      | <b><u>Complete</u></b> | <b><u>In-Process</u></b> | <b><u>Not Started</u></b> | <b><u>Total</u></b> |
|-------------------------------------|------------------------|--------------------------|---------------------------|---------------------|
| Human Resources                     | -                      | 1                        | -                         | 1                   |
| Purchasing and Related Expenditures | 1                      | 1                        | -                         | 2                   |
| <b>Total</b>                        | <b>1</b>               | <b>2</b>                 | <b>-</b>                  | <b>3</b>            |

**Human Resources**

1. In addition to the existing employee related documents, the Human Resources Department should maintain the applicable job posting and hiring documentation within a personnel file (e.g., application, resume, references, end interview evaluation). The Human Resources Department should develop a checklist indicating the existence of the above employee related documents. Nawrocki Smith provided a sample checklist for the District's review.

**Status as of November 2024: In-Process**

**Purchasing and Related Expenditures**

2. In addition to the existing procedures, the Purchasing Department should consider utilizing the narratives attached to the Purchasing report to enhance its current departmental purchasing process manual, including vendor solicitation, purchase requisitions, purchase orders, receiving, accounts payable, claims audit, and accounting and reporting of purchasing activities. The documented procedures should be reviewed and updated annually to maintain relevance and distributed to District Administrators and those involved in these processes to confirm existing procedures and/or communicate any changes in operations. This will allow for process sustainability, an internal annual review of processes, and serve as a training document for the Department and the various District Administrators.

**Status as of November 2024: In-Process**

**Yonkers City School District**  
**Annual Risk Assessment**  
**November 2024**

3. The Finance Department should review the permissions user account report and verify the appropriateness of user accounts and permissions on an individual employee basis. Any permissions determined to be a segregation of duties issue should be revised or deactivated. This recommendation will assist the Finance Department in reducing the risk of unauthorized access to the financial application and enhancing controls over its accounting and reporting.

**Status as of November 2024: Complete**

**EXHIBITS**

***Exhibit I***      History of Internal Audit Services

***Exhibit II***      Internal Audit Plan for 2025



Yonker City School District  
History of Internal Audit Services

◇ = Risk Assessment Complete   ★ = Business Cycle Review Complete   != Not Auditable  
✓ = Testing on Business Process Provided   ◆ = Special Request Services Provided

|    | Business Process                           | Business Process Categories                             | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|----|--|---|------|------|------|------|------|------|------|------|------|
|    | <b>Risk Assessment</b>                     | Risk Assessment (Includes all Business Processes Below) | ◇    | ◇    | ◇    | ◇    | ◇    | ◇    | ◇    | ◇    | ◇    |
| 1  | <b>Governance and Planning</b>             | Governance Environment                                  |      |      |      |      | ★    |      |      |      |      |
|    |  | Control Environment / Policies & Proc.                  |      |      |      |      |      |      |      |      |      |
| 2  | <b>Budget Development</b>                  | Budget Development                                      | ★    |      |      |      |      |      |      |      |      |
|    |  | Budget Monitoring & Reporting                           | ★    |      |      |      |      |      |      |      | ✓    |
| 3  | <b>Accounting &amp; Reporting</b>          | Financial Accounting and Reporting (Journal Entries)    |      | ✓    |      |      |      |      |      |      | ✓    |
|    |  | External/Internal/Claims Auditing                       | ✓    | ✓    | ✓    | ✓    | ✓    | ✓    | ✓    | ✓    | ✓    |
|    |  | Fund Balance Management                                 |      |      |      |      |      |      |      |      |      |
| 4  | <b>Revenue and Cash Management</b>         | Real Property Tax                                       |      |      |      |      |      |      |      |      |      |
|    |  | State Aid   |      |      |      |      |      |      | ✓    |      |      |
|    |  | Out of District Tuition/Reimb. Exp.                     |      |      |      |      |      |      |      |      |      |
|    |  | Use of Facilities                                       |      |      |      |      |      |      |      |      |      |
|    |  | Donations   |      |      |      |      |      |      |      |      |      |
|    |  | Vending Machines  |      |      |      |      | ★    |      |      |      |      |
|    |  | Cash Receipts   |      |      |      | ✓    |      |      |      | ✓    |      |
|    |  | Cash & Investment Management                            |      |      |      |      |      |      |      |      |      |
|    |  | Petty Cash  |      |      |      |      |      |      |      |      |      |
|    |  | Bank Reconciliations                                    |      |      |      |      |      |      |      |      |      |
|    |  | Online Banking  |      |      |      |      |      |      |      |      |      |
|    |  | Accounts Receivable                                     |      |      |      |      |      |      | ✓    |      |      |
| 5  | <b>Grants</b>                              | General Processing                                      |      |      |      |      |      |      |      |      |      |
|    |  | Grant Application                                       |      |      |      |      |      |      |      |      |      |
|    |  | Allowable Costs & Expenditures                          |      |      |      |      | ✓    |      |      |      |      |
|    |  | Monitoring  |      |      |      |      |      |      |      |      |      |
|    |  | Reporting   |      |      |      |      |      |      |      |      | ✓    |
| 6  | <b>Payroll</b>                             | Payroll Disbursements                                   |      |      |      |      |      |      |      | ✓    | ★    |
|    |  | Overtime Reporting                                      |      |      | ✓    |      | ✓    |      |      |      | ★    |
|    |  | Payroll Accounting & Reporting                          |      |      |      |      |      |      |      |      | ★    |
|    |  | Payroll Tax Filings                                     |      | ✓    |      |      |      |      |      |      | ★    |
|    |  | Payroll Reconciliation                                  |      |      |      |      |      |      |      |      | ★    |
| 7  | <b>Human Resources</b>                     | Employment Requisition/Hiring                           |      | ✓    |      |      |      |      |      | ✓    |      |
|    |  | Personnel Evaluation                                    |      | ✓    |      |      |      |      |      |      |      |
|    |  | Termination   |      | ✓    |      |      |      |      |      |      |      |
|    |  | Employee Attendance                                     |      | ✓    | ✓    |      | ★    |      |      |      |      |
| 8  | <b>Benefits</b>                            | Eligibility   |      |      |      |      |      |      |      |      |      |
|    |  | Benefit Calculations                                    |      | ✓    |      |      |      |      |      |      |      |
|    |  | Patient Protection & Affordable Care Act                |      |      |      |      |      |      |      |      |      |
|    |  | Retiree Benefits  |      |      |      |      |      |      |      |      |      |
|    |  | ERS/TRS   |      |      |      |      |      |      |      |      | ✓    |
| 9  | <b>Purchasing and Related Expenditures</b> | PO System & Vendor Database                             |      |      |      |      | ★    |      |      | ★    |      |
|    |  | Purchasing Process                                      |      |      |      |      |      |      |      | ★    |      |
|    |  | Payment Processing                                      |      |      |      |      |      |      |      | ★    |      |
|    |  | Employee Reimbursements                                 |      | ✓    |      |      |      |      |      | ★    |      |
|    |  | Credit Cards  |      |      |      |      |      |      |      |      |      |
| 10 | <b>Facilities Maintenance</b>              | Facilities Maint. & Work Order Proc.                    |      |      |      |      |      |      | ✓    |      | ✓    |
|    |  | Custodial Overtime & Training                           |      |      |      |      |      |      |      |      |      |
|    |  | Preventive Maintenance                                  |      |      |      |      |      |      |      |      |      |
|    |  | Coordination with Outside Vendors                       |      |      |      |      |      |      |      |      |      |



Yonker City School District  
History of Internal Audit Services

◇ = Risk Assessment Complete    ★ = Business Cycle Review Complete    ! = Not Auditable  
✓ = Testing on Business Process Provided    ◆ = Special Request Services Provided

|    | Business Process             | Business Process Categories        | 2016 | 2017 | 2018 | 2019 | 2020 | 2021 | 2022 | 2023 | 2024 |
|----|------------------------------|------------------------------------|------|------|------|------|------|------|------|------|------|
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 11 | Capital Projects             | Construction Planning & Monitoring |      |      |      |      |      |      |      |      |      |
|    |                              | Capital Project Funding & Payments |      |      |      |      |      |      |      |      |      |
|    |                              | Recordkeeping & Reporting          |      |      |      |      |      |      |      |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 12 | Fixed Assets                 | Inventory/ Capitalization Policy   |      |      |      |      |      |      |      |      |      |
|    |                              | Acquisition and Disposal           |      |      |      |      |      |      |      |      |      |
|    |                              | Inventory Process & Recordkeeping  |      |      | ✓    |      |      |      | ✓    | ✓    | ✓    |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 13 | Food Service                 | Sales Cycle and System             |      |      |      |      |      |      |      |      | ✓    |
|    |                              | Inventory and Purchasing           |      |      |      |      |      |      |      |      |      |
|    |                              | Free & Reduced Meals               |      |      |      |      |      |      |      |      |      |
|    |                              | Federal and State Reimbursement    |      |      |      |      |      |      | ✓    |      |      |
|    |                              | Financial Reporting & Monitoring   |      |      |      |      |      |      |      |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 14 | Extraclassroom Activity Fund | General Controls                   | ★    |      |      | ★    |      |      |      | ✓    | ◆    |
|    |                              | Revenue                            |      |      |      | ★    |      |      |      | ✓    |      |
|    |                              | Expenditures                       |      |      |      | ★    |      |      |      | ✓    |      |
|    |                              | Reporting                          |      |      |      | ★    |      |      |      | ✓    |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 15 | Information System           | Governance                         |      |      |      |      |      |      |      | ★    |      |
|    |                              | Inventory                          |      |      |      |      |      |      |      | ★    |      |
|    |                              | Network Security                   |      |      |      |      |      |      |      | ★    |      |
|    |                              | Application Security               |      |      |      |      |      |      |      | ★    | ✓    |
|    |                              | Physical Security                  |      |      |      |      |      |      |      | ★    |      |
|    |                              | Disaster Recovery                  | ✓    |      |      |      |      |      |      | ★    |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 16 | Cybersecurity                | General Controls                   |      |      |      |      | ★    |      |      | ★    |      |
|    |                              | Information & Asset Security       |      |      |      |      | ★    |      |      | ★    |      |
|    |                              | Vulnerability Assessment           |      |      |      |      | ★    |      |      | ★    |      |
|    |                              | Incident Response & Recovery       |      |      |      |      | ★    |      |      | ★    |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 17 | Student Data Management      | Registration & Enrollment          |      | ✓    |      | ★    |      |      | ✓    |      |      |
|    |                              | Student Attendance                 |      |      |      | ★    |      |      |      |      |      |
|    |                              | Student Performance                |      |      |      | ★    |      |      |      |      |      |
|    |                              | Student Eligibility                |      |      |      |      |      |      |      | ✓    |      |
|    |                              | Adult Education                    |      |      |      |      |      | ★    | ★    |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 18 | Pupil Personnel Services     | Budgeting and Planning             |      |      |      |      |      |      | ✓    |      |      |
|    |                              | STAC Reimbursement                 |      |      |      |      |      |      | ✓    |      |      |
|    |                              | Medicaid Reimbursement             | ★    |      |      |      |      |      | ✓    |      |      |
|    |                              | RFP and Contracts                  |      |      |      |      |      |      |      |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 19 | Transportation               | Fleet Inventory and Maintenance    |      |      | ★    |      |      | ★    |      |      |      |
|    |                              | Bus Routing and Planning           |      |      | ★    |      |      | ★    |      |      |      |
|    |                              | Labor and Supervision              |      |      | ★    |      |      | ★    |      |      |      |
|    |                              | Contract Management                |      |      | ★    |      |      | ★    |      |      |      |
|    |                              | Federal and State Reimbursement    |      |      | ★    |      |      | ★    |      |      |      |
|    |                              | MetroCards                         |      |      |      |      |      |      | ★    |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 20 | Safety & Security            | Plan Development & Strategy        |      | ✓    |      |      |      |      |      |      |      |
|    |                              | Building Access & Security System  |      |      | ✓    |      |      |      | ✓    |      | ✓    |
|    |                              | Compliance and Incident Reporting  |      |      |      |      |      |      |      |      |      |
|    |                              | Safety & Security Monitoring       |      |      |      |      |      |      |      |      |      |
|    |                              |                                    |      |      |      |      |      |      |      |      |      |
| 21 | Insurance / Risk Management  | Actuary & Underwriting             |      |      |      |      |      |      |      |      |      |
|    |                              | Policy Management                  |      |      |      |      |      |      |      |      |      |
|    |                              | Claims Reporting                   |      |      |      |      |      |      |      |      |      |





**Yonkers City School District**

**2025 INTERNAL AUDIT PLAN**

**(Based upon November 2024 Risk Assessment Update)  
Exhibit II**

**Cycle Reviews**

- Analysis of Use of Vehicles
- Analysis of Student Registration
- Analysis of Payroll Overtime
- Governance & Planning

**Planned For**

Complete  
April 2025  
May 2025  
July 2025

**Key Control Testing Areas**

- Personnel Evaluation
- Benefits Calculations
- Analysis of Form 1099 – Miscellaneous Income Statements
- Fixed Asset Inventory
- Food Services Sales Cycle & System
- Extraclassroom Activity Fund Expenditures
- Medicaid Reimbursement
- Student Grade Changes
- Facilities Work Orders

**Planned For**

April 2025  
April 2025  
May 2025  
May 2025  
June 2025  
June 2025  
June 2025  
July 2025  
July 2025

**Additional Internal Audit Services**

- Extraclassroom Activity Training
- Mid-Year Status Reports
- Annual Risk Assessment Update
- External Audit Corrective Action Plan Monitoring
- Prior Year Internal Audit Recommendations Follow-Up
- Other Internal Audit Services at the request of the District

**Planned For**

Complete  
July 2025  
November 2025  
November 2025  
November 2025  
As Requested