

# Yonkers City School District

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

November 2021

#### 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 2020 Risk Assessment by performing certain internal audit procedures pertaining to the time period starting December 1, 2020 through November 30, 2021. 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* February 3, 2022



## **Yonkers City School District**

## <u>Annual Risk Assessment Update</u> <u>Pertaining to the Internal Controls</u> <u>of District Operations</u>

## November 2021

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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, development of a risk assessment of district operations, including but not limited to:

- 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 which analyze significant risk assessment findings.
- Recommended changes for strengthening controls and reducing identified risk; and specifying time frames for implementation of 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.

## **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 2021 and were carried out in order to determine an internal audit plan for the calendar year 2022 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 of 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.

## **INTERNAL AUDIT COVID PANDEMIC CONSIDERATIONS**

As Districts are challenged in carrying out certain internal control procedures during the COVID pandemic, our risk assessment included the following environmental considerations:

- Has Management's risk tolerance increased allowing for a lower level of control effectiveness?
- Have staff changes (reorganization, furloughs, and terminations) impacted controls, processes, performance, and increased opportunities for potential fraud?
- Have segregation of duty conflicts been managed with changes in people and processes?
- Has Management assessed the impact on key processes and controls including technology?
- Have there been any material changes in internal control over financial reporting that will require disclosure in the previous and upcoming audit report?

## **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 upon 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 time period noted within the risk rating and internal audit plan. The plan as presented will be revised each year based upon 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.

CURRENT	YEAR RATINGS	CHANGE FROM PR	IOR YEAR
<b>Rating</b>	<u>2020/2021</u>	<u>Category (*)</u>	<u>Count</u>
High	- 0.00%	"High" to "Low"	- 0.00%
Moderate	19 20.65%	"High" to "Moderate"	- 0.00%
Low	73 79.35%	"Moderate" to "Low"	3 37.50%
Total	<b>92</b> 100.00%	"Low" to "Moderate"	5 62.50%
		"Moderate" to "High"	- 0.00%
		Total	8 100.00%

Our November 2021 risk assessment update contains nine (9) recommendations, as follows:

Business Process	Recommendation(s)
Human Resources	4
Facilities Maintenance	3
Transportation	2
Total Recommendations	9

The status of the four (4) prior year risk assessment recommendations is as follows:

	Completed	<b>In-Process</b>	Not Started	Total	
PY Recommendations	-	3	1	4	

We recommend the District consider the following areas for internal audit cycle and/or key control procedures to be performed during the calendar year 2022:

Cycle Reviews:	Other 2022 Planned Internal Audit Services:	
Human Resources	• Key Control/Other Testing (See "T" categories on Pages 5-7)	NIST Gap Analysis
Capital Projects	External Audit Corrective Action Plan Monitoring	Transportation Cycle Recommendations Follow- Up
	Mid-Year Internal Audit Status Reports	Annual Risk Assessment Update as of Nov 2022
	Cybersecurity Cycle Recommendations Follow-Up	• Other Internal Audit Services at the Request of the District/BOE

<b>Risk Rating and Internal Audit P</b>	lan
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√ = Internal Audit Services Provided ★= Business Cycle Review Complete X = Proposed Business Cycle Review T = Proposed Key Control Testing

RISK YEAR OF SERVICE **Business Process Business Process Categories** Prior 2022 Subsequent Inherent Control 2020 2021 Н Governance Environment L L 1 ★ Governance and 1 Planning Н L L Х 2 Control Environment / Policies & Proc. Н 3 Budget Development L L ★ 2 **Budget Development** 4 Н L L ★ Budget Monitoring & Reporting Financial Accounting and Reporting Н L L √ 5 Accounting & Н 3 6 External/Internal/Claims Auditing L L Х Reporting Н Fund Balance Management L L Х 7 Μ L L Х 8 Real Property Tax Н L L Х 9 State Aid Μ L L Т Х 10 Out of District Tuition/Reimb. Exp. L L 11 Use of Facilities L Х Μ L L Х 12 Donations Н Μ L 13 Vending Machines ★ **Revenue and Cash** 4 Management Н L L 14 Cash Receipts  $\checkmark$ Х Н L L 15 Cash & Investment Management Х L L 16 Petty Cash L Х L Bank Reconciliations н L Х 17 Н L L 18 Online Banking Х Н 19 Accounts Receivable L L Х н L L 20 General Processing Х Μ 21 Grant Application L L Х 5 Н L L ~ Х 22 Allowable Costs & Expenditures Grants 23 Μ L L Х Monitoring Н L L Х 24 Reporting L L Х 25 Payroll Disbursements Н Overtime Reporting Μ Μ √ Т Х 26 н Н L L Х 6 Payroll 27 Payroll Accounting & Reporting L L √ Х Н 28 **Payroll Tax Filings** Payroll Reconciliation Х 29 Н Μ Μ 30 **Employment Requisition/Hiring** L Μ √ Х Н Personnel Evaluation Н L Μ √ Х 31 7 Human Resources н Μ Μ √ Х 32 Termination Μ √ Х 33 Employee Attendance Н Μ

<b>Risk Rating and Internal Audit Plan (Continued)</b>
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= Internal Audit Services Provided	X = Proposed Business Cycle Review
★= Business Cycle Review Complete	T = Proposed Key Control Testing

				ŀ	RISK		YE	AR OF SI	ERVICE
	<b>Business Process</b>		Business Process Categories	Inherent	Cor	ıtrol	Prior	2022	Subsequent
					2020	2021			
		34	Eligibility	Н	L	L			Х
		35	Benefit Calculations	Н	L	L	√		X
8	Benefits	36	Patient Protection & Affordable Care Act	Н	L	L			X
		37	Retiree Benefits	Н	L	L			Х
		38	ERS/TRS	Н	L	L			Х
		39	PO System & Vendor Database	Н	L	L	*		
	Purchasing and	40	Purchasing Process	Н	L	L			Х
9	Related	41	Payment Processing	Н	L	L			Х
	Expenditures	42	Employee Reimbursements	Н	L	L	$\checkmark$		X
		43	Credit Cards	Н	L	L			Х
		44	Facilities Maintenance/Work Orders	Н	L	L		Т	Х
•	Facilities	45	Staff Supervision	М	L	L			Х
.0	Maintenance	46	Preventive Maintenance	М	L	L			Х
		47	Coordination with Outside Vendors	М	L	Μ		T	Х
		48	Construction Planning & Monitoring	Н	L	L		X	
1	<b>Capital Projects</b>	49	Capital Project Funding & Payments	М	L	L		X	
		50	Recordkeeping & Reporting	М	L	L		X	
				_					
		51	Inventory/ Capitalization Policy	Н	L	L			Х
12	<b>Fixed Assets</b>	52	Acquisition and Disposal	Н	L	L			X
		53	Inventory Process & Recordkeeping	Н	L	L	$\checkmark$	Т	Х
								i	
		54	Sales Cycle and System	Μ	L	L			X
		55	Inventory and Purchasing	Μ	L	L			Х
13	<b>Food Service</b>	56	Free & Reduced Meals	М	L	L			Х
		57	Federal and State Reimbursement	Н	L	L			X
		58	Financial Reporting & Monitoring	Н	L	L			Х
		59	General Controls	Н	М	Μ	*		
	Extraclassroom	60	Revenue	Н	L	Μ	*		
14	Activity Fund	61	Expenditures	М	L	Μ	*		
		62	Reporting	М	Μ	Μ	*		

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

= Internal Audit Services Provided	X = Proposed
★= Business Cycle Review Complete	T = Pronoseo

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

Business Process         Business Process Categories         Inherent         Control         Prior         2022         Subsequent           15         Information System         63         Governance         H         I.         I.         X           64         inventory         H         I.         I.         X         X           65         Network Security         H         M         M         X         X           65         Disaster Recovery         H         M         M         X         X           67         Physical Security         H         M         M         X         X           68         Disaster Recovery         H         M         M         X         X           70         Information & Asset Security         H         M         M         X         X           70         Information & Asset Security         H         M         M         X         X           71         Vulnerability Assessment         H         M         M         X         X           72         Incident Response & Recovery         H         M         L         L         X           73         Student Data					ŀ	RISK			YEAR	OF SERVICE
$ \begin{array}{ c c c c c c c c c c c c c c c c c c c$		<b>Business Process</b>		Business Process Categories	Inherent	Cor	ıtrol	Prior	2022	Subsequent
15       Information       64       Inventory       II       I <th></th> <th></th> <th></th> <th></th> <th></th> <th>2020</th> <th>2021</th> <th></th> <th></th> <th></th>						2020	2021			
Information System       65       Network Security       H       L       M       M       X         67       Physical Security       H       M       M       X       X         67       Physical Security       H       M       M       X       X         68       Disaster Recovery       H       M       M       X       X         70       Information & Asset Security       H       M       M       X       X         71       Vulnerability Assessment       H       M       M       X       X         71       Vulnerability Assessment       H       M       M       X       X         72       Incident Response & Recovery       H       M       M       X       X         73       Registration & Enrolment       H       L       L       X       X         74       Student Altendance       H       L       L       X       X         74       Student Eligibility       H       L       L       X       X         75       Student Eligibility       H       L       L       T       X         78       STAC Reimbursement       H       L <th></th> <td></td> <td>63</td> <td>Governance</td> <td>Н</td> <td>L</td> <td>L</td> <td></td> <td></td> <td>Х</td>			63	Governance	Н	L	L			Х
15       mm system       66       Application Security       H       M       M       X         67       Physical Security       H       H       L       L       X         68       Disaster Recovery       H       M       M $\checkmark$ X         16       Cybersecurity       69       General Controls       H       M       M $\star$ X         16       Cybersecurity       69       General Controls       H       M       M $\star$ X         16       Cybersecurity       69       General Controls       H       M       M $\star$ X         17       Student Data Management       73       Registration & Enrolment       H       M       M $\star$ T         17       Student Data Management       73       Student Attendance       H       L       L $\star$ T         18       Pupil Personnel Services       77       Budgeting and Planning       H       L       L       T       X         18       Pupil Personnel Services       77       Budgeting and Planning       H       M       M $\star$ I       L       L $\star$			64	Inventory	Н	L	L			Х
System66Application SecurityHMMMX67Physical SecurityHLLX68Disaster RecoveryHMM✓X70Information & Asset SecurityHMM★71Vulnerability AssessmentHMM★71Vulnerability AssessmentHMM★71Vulnerability AssessmentHMM★72Incident Response & RecoveryHMM★73Registration & EnrolmentHLL★T74Student AttendanceHLL★75Student PerformanceHMLTX76Student EligibilityHLLTX78STAC ReimbursementHLLTX79Medical ReimbursementHLLTX79Medical ReimbursementHLLXX79Medical and PlanningHLLXX79Medical and PlanningHLLXX79Medical ReimbursementHLLXX79Medical and PlanningHLLXX79Medical ReimbursementHLLXX79Medical State R	15	Information	65	Network Security	Н	L	Μ			Х
Identify68Disaster RecoveryHMM $\checkmark$ XVertice of the system of t	15	System	66	Application Security	Н	Μ	Μ			Х
16       Cybersecurity       69       General Controls       H       M       M $\star$ 16       Origonal Controls       H       H       M       M $\star$			67	Physical Security	Н	L	L			X
16       Cybersecurity       11       M       M $\star$ Image: method of the set o			68	Disaster Recovery	Н	Μ	Μ	$\checkmark$		Х
16       Cybersecurity       11       M       M $\star$ Image: method of the set o										
16       Cybersecurity       71       Full metabolity Assessment       H       M       M       M       M         71       Vulnerability Assessment       H       M       M       M $\star$ Image: Cybersecurity       Im			69	General Controls	Н	Μ	Μ	*		
117  Vulnetability Assessment III III IIIIIIIIIIIIIIIIIIIIIIIIIIII	16	Cubanaannitu	70	Information & Asset Security	Н	Μ	Μ	*		
17       Student Data Management       73       Registration & Enrolment       H       L       L $\star$ T         17       Student Data Management       73       Student Attendance       H       L       L $\star$ T         18       Pupil Personnel Services       76       Student Eligibility       H       L       L       T       X         18       Pupil Personnel Services       77       Budgeting and Planning       H       L       L       T       X         18       Pupil Personnel Services       77       Budgeting and Planning       H       L       L       T       X         19       Transportation       81       Fleet Inventory and Maintenance       H       L       L $\star$ N         19       Transportation       81       Fleet Inventory and Maintenance       H       L       L $\star$ N         20       Safety & Security       81       Fleet Inventory and Maintenance       H       L       L $\star$ N         21       Insurance / Risk magement       H       L       L $\star$ N       N $\star$ N         21       Insurance / Risk magement	10	Cybersecurity	71	Vulnerability Assessment	Н	Μ	Μ	*		
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18Pupil Personnel Services77Budgeting and Planning 78H STAC ReimbursementH H HL LLT TX X19Transportation81Fleet Inventory and Maintenance 82H Bus Routing and Planning HH HL LLTX19Transportation81Fleet Inventory and Maintenance 83H L LL LL XX19Transportation81Fleet Inventory and Maintenance 84H ContractsH HL LL XX20Safety & Security86Plan Development & Strategy 87H Building Access & Security System 88Compliance and Incident Reporting HH L LL XX20Safety & Security90GeneralH H LL LL XX21Insurance / Risk Management90GeneralH H HL LL LX	17	Management	75	Student Performance	Н	Μ	L	*		
18       Pupil Personnel Services       78       STAC Reimbursement       H       L       L       T       X         79       Medicaid Reimbursement       H       H       L       L       T       X         80       RFP and Contracts       H       H       L       L       X       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       L       L       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       M       M       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       L       L       X         19       Transportation       81       Fleet Inventory and Maintenance       H       M       M       ★			76	Student Eligibility	Н	L	L			Х
18       Pupil Personnel Services       78       STAC Reimbursement       H       L       L       T       X         79       Medicaid Reimbursement       H       H       L       L       T       X         80       RFP and Contracts       H       H       L       L       X       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       L       L       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       M       M       X         19       Transportation       81       Fleet Inventory and Maintenance       H       H       L       L       X         19       Transportation       81       Fleet Inventory and Maintenance       H       M       M       ★										
18       Nepresentation       79       Medicaid Reimbursement       H       M       L       ★       Image: Constraints         19       Transportation       81       Fleet Inventory and Maintenance       H       L       L       ★       X         19       Transportation       81       Fleet Inventory and Maintenance       H       L       L       ★       X         19       Transportation       81       Fleet Inventory and Maintenance       H       M       M       ★       X         19       Transportation       81       Fleet Inventory and Maintenance       H       M       M       ★       X         19       Transportation       81       Fleet Inventory and Maintenance       H       M       M       ★       X         19       Transportation       83       Labor and Supervision       H       M       M       ★       X         83       Labor and Supervision       H       H       L       L       ★       X         10       Safety & Security Management       H       L       L       ✓       X         10       Safety & Security Monitoring       H       L       L       X       X			77	Budgeting and Planning	Н	L	L		Т	Х
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19       Transportation       81       Fleet Inventory and Maintenance       H       L       L       ★	10	Services	79	Medicaid Reimbursement	Н	Μ	L	*		
19       Transportation       82       Bus Routing and Planning       H       M       M       ★       (4)         19       Transportation       83       Labor and Supervision       H       M       M       ★       (4)         84       Contract Management       H       H       M       M       ★       (4)         84       Contract Management       H       L       L       ★       (4)         85       Federal and State Reimbursement       H       L       L       ★       (4)         20       Safety & Security       86       Plan Development & Strategy       H       L       L       ✓       X         86       Plan Development & Strategy       H       L       L       ✓       X         87       Building Access & Security System       H       L       L       ✓       X         88       Compliance and Incident Reporting       H       L       L       X       X         89       Safety & Security Monitoring       H       L       L       X       X         91       Policy Management       H       L       L       X       X			80	RFP and Contracts	Н	L	L			Х
19       Transportation       82       Bus Routing and Planning       H       M       M       ★       (4)         19       Transportation       83       Labor and Supervision       H       M       M       ★       (4)         84       Contract Management       H       H       M       M       ★       (4)         84       Contract Management       H       H       L       L       ★       (4)         85       Federal and State Reimbursement       H       L       L       ★       (4)         20       Safety & Security       86       Plan Development & Strategy       H       L       L       ✓       X         86       Plan Development & Strategy       H       L       L       ✓       X         87       Building Access & Security System       H       L       L       ✓       X         88       Compliance and Incident Reporting       H       L       L       ✓       X         89       Safety & Security Monitoring       H       L       L       X       X         91       Policy Management       H       L       L       X       X										
19       Transportation       83       Labor and Supervision       H       M       M       ★          84       Contract Management       H       L       L       ★          85       Federal and State Reimbursement       H       L       L       ★          86       Plan Development & Strategy       H       L       L       ✓       X         87       Building Access & Security System       H       L       L       ✓       X         88       Compliance and Incident Reporting       H       L       L       ✓       X         89       Safety & Security Monitoring       H       L       L       ✓       X         90       General       H       L       L       ✓       X         91       Policy Management       H       L       L       ✓       X			81	Fleet Inventory and Maintenance	-					
84       Contract Management       H       L       L       ★         85       Federal and State Reimbursement       H       L       L       ★			82	Bus Routing and Planning	Н	Μ	Μ	*		
85     Federal and State Reimbursement     H     L     L     ★       86     Plan Development & Strategy     H     L     L     ✓     X       87     Building Access & Security System     H     L     L     ✓     X       88     Compliance and Incident Reporting     H     L     L     ✓     X       89     Safety & Security Monitoring     H     L     L     ✓     X       90     General     H     L     L     L     X       91     Policy Management     H     L     L     L     X	19	Transportation	83	Labor and Supervision	Н	Μ	Μ	*		
20       Safety & Security       86       Plan Development & Strategy       H       L       L       ✓       X         87       Building Access & Security System       H       L       L       ✓       X         88       Compliance and Incident Reporting       H       L       L       ✓       X         89       Safety & Security Monitoring       H       L       L       ✓       X         90       General       H       L       L       ✓       X         91       Policy Management       H       L       L       ✓       X			84		Н			*		
20Safety & Security87Building Access & Security SystemHLLVX88Compliance and Incident ReportingHLLVX89Safety & Security MonitoringHLLX90GeneralHLLX90GeneralHLLX91Policy ManagementHLLX			85	Federal and State Reimbursement	Н	L	L	*		
20Safety & Security87Building Access & Security SystemHLLVX88Compliance and Incident ReportingHLLVX89Safety & Security MonitoringHLLX90GeneralHLLX90GeneralHLLX91Policy ManagementHLLX			_	-						
20       Safety & Security       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         21       Policy Management       H       L       L       X			86		-					
88     Compliance and Incident Reporting     H     L     L     L     X       89     Safety & Security Monitoring     H     L     L     X       90 General       90     General     H     L     L     X       91     Policy Management     H     L     L     X	20	Safety & Security			-		L	✓		
Management     90 General     H     L     L     X       91 Policy Management     H     L     L     X	20	Salety & Security	88	Compliance and Incident Reporting	-					
21Insurance / Risk Management91Policy ManagementHLLX			89	Safety & Security Monitoring	Н	L	L			X
21Insurance / Risk Management91Policy ManagementHLLX										
<sup>21</sup> Management <sup>91</sup> Policy Management <sup>11</sup> L L <u>X</u>		Insurance / Dial-	90		-					X
92 Claims Reporting H L L X	21		91	· · · ·	_					
			92	Claims Reporting	Н	L	L			X

<u>Inherent Risk</u> – 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.

<u>Control Risk</u> – 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.

## **RISK ASSESSMENT OBSERVATIONS AND RECOMMENDATIONS**

#### **Current Year Risk Assessment Observations and Recommendations**

Human Resources

- 1. Non-instructional employees do not utilize a leave request form to document the request and approval of their absences. It is current practice for non-instructional employees to request and receive approval from their Direct Supervisor verbally or via email.
  - ➤ We recommend the Human Resources Department develop a leave request form for non-instructional employees to formally document their request and approval of their absences. The non-instructional employees should obtain pre-approval from their building level Supervisors for vacations, personal days, maternity, bereavement, military, jury duty, extended sick, and conference leave days. Once the form is implemented, the Human Resources Department should be reviewing the leave forms received to ensure that the proper approval has been acquired. Any incomplete absence forms should be forwarded back to the employee's immediate Supervisor for approval. The leave request forms should be filed and maintained within the employees' personnel file in the Human Resources Department.
- 2. For the District employees that are required to be evaluated on an annual basis, the Human Resources Department has a process to maintain copies of the annual evaluations within the employees' personnel files. The evaluation completion is not tracked within the District's human resources/payroll application, ePersonality.
  - > The Human Resources Department should utilize the full capabilities of the application ePersonality and track the completion of the evaluations for the District employees that are required to be evaluated on an annual basis. This will ensure that the employee personnel files are complete.
- 3. The Human Resource Department has not developed a process to track teaching certification within the human resources/payroll application, ePersonality, and does not maintain the current certifications within the employee personnel files.
  - The Human Resource Department should maintain complete, accurate, and up-to-date certification information in ePersonality and up-to-date certification documents within an employee's personnel file. Subsequent to the hiring process, the Human Resource Department should designate an employee to review the certification information for accuracy and completeness. The review process should be documented, and any discrepancies should be communicated to the Deputy Commissioner for Human Resources. This will ensure that the employee certifications are accurate and reliable for the Human Resource Department to evaluate whether the District employees are in compliance with the New York State Education requirements in respect to holding a New York State certificate for employment in state public schools and that they have met the required degree, coursework, assessment, and experience requirements.

- 4. The Human Resource Department does not utilize an exit checklist when employees terminate or leave the District.
  - We recommend the Human Resources Department develop an exit checklist to utilize when an employee is terminated or leaves the District. The District should utilize the exit checklist to document that all property in the custody of the employee including, but not limited to laptops, badges, keys, cell phones, etc. has been returned. The exit checklist will provide the support that proper procedures are followed when employees have been terminated and their access has been removed from the District's financial and other applications.

#### **Facilities Maintenance**

- 5. It was indicated that the Facilities Department has a substantial number of work orders for which the status remains open in SchoolDude as the Facilities Department has not obtained from the building level Supervisor/Staff the required information and documentation to update the status and close the work orders.
  - > We recommend the Facilities Department explore the software capabilities in SchoolDude and develop a monthly reporting process for the building level Supervisors/Staff to submit documentation and information regarding the status of open work orders. This will assist the Facilities Department in monitoring outstanding work orders and managing its workload and personnel in an efficient manner. This will increase the District's internal controls over its resources and work order system.
- 6. The Facilities Department has not established a process for its employees to receive written approval from their direct Supervisors prior to working overtime.
  - > We recommend that the Building and Facilities Department develop a weekly overtime schedule indicating the projects, applicable budget accounts codes, custodians, and hours of required overtime. The Facilities Department Department should compare the overtime sheets to the overtime schedule to ensure that the overtime hours were properly documented and worked. This allows management to make sure that overtime is incurred for a valid and needed purpose, and that funding for the non-emergency overtime is provided for in the budget.
- 7. The Claims Auditor reports indicated several instances that the invoices and contractual rates did not agree for purchases made by the Facilities Department. The Facilities Department needs improvement in reviewing the voucher packages applicable to its departmental purchases prior to submitting them to Accounts Payable and Claims Auditor for processing.
  - The Facilities Department should review each voucher to ensure that payments will only be authorized for goods and services received, that are of acceptable quality, and that the invoice rates agree to the contractual rates. A complete review of a voucher package lessens the risk that unauthorized purchases and incorrect payments are processed without detection. Payments may be delayed if there are discrepancies between invoice and contractual rates until those discrepancies are rectified prior to being submitted to the Claims Auditor for review.

#### Transportation

- 8. The Transportation Department has not developed a formal procedure or form to document the request and approval of adding, editing, or deleting a student bus route within the transportation bus route application Transfinder. It is current practice for the Transportation Dispatchers to request and receive approval from the Transportation Director verbally or via email.
  - We recommend the Transportation Department develop a bus route form to formally document the request and approval of adding, editing, or deleting a student bus route within the transportation bus route application Transfinder. This bus route request form should include the reason a bus route needs to be added/edited/ deleted, anticipated additional expenses for the District, effective date, requestor's name and date, and approval's name and date. This will assist the Transportation Department in enhancing its oversight controls in bus routing and planning.
- 9. We analyzed the user permission reports of the bus routing applications Transfinder and noted that the Transportation and Dispatchers had the same administrative user access rights to create/modify bus routes, roles, maps, databases, contractors, vehicles, and passwords. This creates a risk in the bus route development and monitoring process as edits made by the Dispatchers to the bus routes, maps, contractors, and vehicles may become undetected by the Transportation Director. We also analyzed the user permission reports of the bus routing applications Viewfinder noted that the users had the same generic password to access the application. This creates a risk as the user passwords can be easily used by multiple people or guessed by unauthorized users to access student personal identifiable information.
  - We recommend that the Transportation Department review the user permissions in Transfinder and revise the access to the Dispatchers to reflect their current job responsibilities and ensure proper segregation of duties in the bus routing development and monitoring process. The Transportation Department should explore the software capabilities in Viewfinder to implement strong password policies and password change frequencies to avoid the usage of generic or default passwords. This will reduce the risk of unauthorized access to the bus routing system and student information.

#### Status of Prior Year Recommendations

We have performed follow-up internal audit services applicable to our previously issued risk assessment update report dated November 2020. The services we performed included observing and evaluating the implementation status of the District's action plan in respect to our prior year risk assessment recommendations. The November 2020 risk assessment update identified four (4) recommendations within three (3) distinct areas. The District has taken action on the four (4) recommendations as follows:

<b>Business Process</b>	<u>Complete</u>	<b>In-Process</b>	Not Started	<u>Total</u>
Governance and Planning	-	1	-	1
Benefits	-	-	1	1
Purchasing & Related Expenditures	-	2	-	2
Total	_	3	1	4

#### Governance and Planning

The District should consider developing an automated workflow process for certain transactions that currently require physical forms to document their requests and approvals. The electronic workflow system should automatically route the request for approval and collect all required documents and attachments to the designated approver every time. Audit logs should be developed to capture the details of the transactions including the individuals requesting and approving the transactions for further review by Management and Auditors. This will assist the District in maintaining an efficient workflow management process, processing transactions in a timely manner, and increasing the accountability of the requestors and approvers. Upon request, Nawrocki Smith will assist in the development of the automated workflow system(s).

#### Status as of November 2021: In-Process

#### Benefits

During its implementation and testing process, we recommend that the Benefits Departments consult with the Information Technology Department to evaluate the system's controls in protecting PII (Personally Identifiable Information) to ensure that only authorized administrators are able to access the information.

#### Status as of November 2021: Not Started

#### Purchasing & Related Expenditures

The Finance Department should review the detail of our observations and confirm the reasons surrounding the identical vendor IDs, names, addresses, and Federal IDs. Additionally, the Finance Department should confirm that there are no duplicate payments to vendors with identical vendor IDs, names, addresses, and Federal IDs. The Finance Department should determine whether or not the vendors with identical vendor IDs, names, addresses, and Federal IDs have business activity with the District and consider deactivating their status within the vendor database, if appropriate.

The Finance Department should establish a practice of reviewing the vendors' federal ID numbers as reported on the Form W9 – Request for Taxpayer Identification Number and Certification for possible identical information in the database prior to entering the vendor's information into the District's vendor database.

#### Status as of November 2021: In Process

The Finance Department should establish a practice of reviewing the activity of each vendor at the end of a fiscal year and update the District's vendor database by inactivating the vendors that have not been utilized within the three (3) prior consecutive fiscal years.

#### Status as of November 2021: In Process

## **EXHIBITS**

*Exhibit I* History of Internal Audit Reports Issued

*Exhibit II* Internal Audit Plan for 2022



# ♦ = Risk Assessment Complete ★ = Business Cycle Review Complete ✓ = Limited Testing on Business Process Provided ♦ = Special Request Services Provided

				Vear	s of Sei	rvice	
	<b>Business Process</b>	Business Process Categories	2016			2019	2020
		0					
	<b>Risk Assessment</b>	Risk Assessment	<b>\$</b>	۵	۵	۵	۵
1	Governance and	Governance Environment					*
	Planning	Control Environment / Policies & Proc.					
	Deriderit		I				
2	Budget Development	Budget Development Budget Monitoring & Reporting	★ ★				
	Development	Budget Wolntoring & Reporting	<b>^</b>				
		Financial Accounting and Reporting (Journal Entries)		✓			
3	Accounting & Reporting	External/Internal/Claims Auditing					
-		Fund Balance Management					
		5					
		Real Property Tax					
		State Aid					
		Out of District Tuition/Reimb. Exp.					
		Use of Facilities					
		Donations					
4	Revenue and Cash					,	*
	Management	Cash Receipts				1	
		Cash & Investment Management Petty Cash					
		Bank Reconciliations					
		Online Banking					
		Accounts Receivable					
	Grants	General Processing					
		Grant Application					
5		Allowable Costs & Expenditures					✓
		Monitoring					
		Reporting					
		D. N.D. I					
	Payroll	Payroll Disbursements			1		1
6		Overtime Reporting Payroll Accounting & Reporting			V		×
U		Payroll Tax Filings		✓			
		Payroll Reconciliation		•			
		Employment Requisition/Hiring		✓			
7	Human Resources	Personnel Evaluation		✓			
'		Termination		✓			
		Employee Attendance		✓	✓		*
		1911 11 11 1					
		Eligibility		1			
8	Benefits	Benefit Calculations Patient Protection & Affordable Care Act		۷			
0	Benefits	Retiree Benefits					
		ERS/TRS					
			1				
		PO System & Vendor Database					*
	Purchasing and	Purchasing Process					
9	Related Expenditures	Payment Processing					
		Employee Reimbursements		✓			
		Credit Cards					
	Facilities Maintenance	Facilities Maint. & Work Order Proc.					
10		Custodial Overtime & Training Preventive Maintenance					
		Coordination with Outside Vendors					
		Coordination with Outside Vehicols					

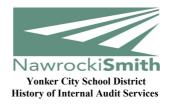




# ♦ = Risk Assessment Complete ★ = Business Cycle Review Complete ✓ = Limited Testing on Business Process Provided ♦ = Special Request Services Provided

				Vear	s of Sei	rvice	
	Business Process	Business Process Categories	2016			2019	2020
11		Construction Planning & Monitoring					
	Capital Projects	Capital Project Funding & Payments					
		Recordkeeping & Reporting					
		Inventory/ Capitalization Policy					
12	Fixed Assets	Acquisition and Disposal					
		Inventory Process & Recordkeeping			✓		
		Sales Cycle and System					
		Inventory and Purchasing					
13	Food Service	Free & Reduced Meals					
		Federal and State Reimbursement					
		Financial Reporting & Monitoring					
		General Controls	*			*	
14	Extraclassroom	Revenue				*	
14	Activity Fund	Expenditures				*	
		Reporting				*	
		Governance					
	Information System	Inventory					
15		Network Security					
15		Application Security					
		Physical Security					
		Disaster Recovery	<ul><li>✓</li></ul>				
		General Controls					*
16	Cybersecurity	Information & Asset Security					*
10		Vulnerability Assessment					*
		Incident Response & Recovery					*
	Student Data Management	Registration & Enrolment		✓		*	
		Student Attendance				*	
17		Student Performance				*	
		Student Eligibility					
		Adult Education					
	Pupil Personnel Services	Budgeting and Planning					
18		STAC Reimbursement					
		Medicaid Reimbursement	*				
		RFP and Contracts					
	Transportation			1			
		Fleet Inventory and Maintenance			*		*
10		Bus Routing and Planning			*		*
19		Labor and Supervision			*		*
		Contract Management			*		*
		Federal and State Reimbursement			*		*
	Safety & Security			-			
		Plan Development & Strategy		✓			
20		Building Access & Security System			1		
		Compliance and Incident Reporting					
		Safety & Security Monitoring					
		A strange & The Jammiting		1			
21	Insurance / Risk	Actuary & Underwriting					
21	Management	Policy Management Claims Reporting					
		Claims Keporting	1				





# ♦ = Risk Assessment Complete ★ = Business Cycle Review Complete ✓ = Testing on Business Provided ♦ = Special Request Services Provided

				Years of Service						
	<b>Business Process</b>	Business Process Categories	2016	2017	2018	2019	2020	202		
	Risk Assessment	Risk Assessment (Includes all Business Processes Below)	<b>\$</b>	۵	<b>\$</b>	\$	۵	۵		
	Governance and	Governance Environment			1		*			
1		Control Environment / Policies & Proc.	_				*			
	Planning	Control Environment / Policies & Proc.								
2	Budget	Budget Development	*							
2	Development	Budget Monitoring & Reporting	*							
				,						
3	Accounting & Reporting	Financial Accounting and Reporting (Journal Entries) External/Internal/Claims Auditing		1						
3		Fund Balance Management								
		rund Balance Management								
		Real Property Tax								
		State Aid								
		Out of District Tuition/Reimb. Exp.								
		Use of Facilities								
		Donations								
	<b>Revenue and Cash</b>	Vending Machines					*			
4	Management	Cash Receipts				✓				
	8	Cash & Investment Management								
		Petty Cash								
		Bank Reconciliations								
		Online Banking								
		Accounts Receivable								
					1					
		General Processing								
		Grant Application								
5	Grants	Allowable Costs & Expenditures					1			
Č		Monitoring								
		Reporting								
		Independing								
		Payroll Disbursements								
		Overtime Reporting			1		1			
6	Payroll	Payroll Accounting & Reporting								
Ĩ	i ayron	Payroll Tax Filings		✓						
		Payroll Reconciliation								
					1					
		Employment Requisition/Hiring		✓						
7	Human Resources	Personnel Evaluation		1						
'		Termination		√						
		Employee Attendance		✓	✓		*			
		Flightlife.								
	Benefits	Eligibility		1						
0		Benefit Calculations	_	*						
8		Patient Protection & Affordable Care Act	_							
		Retiree Benefits	_							
		ERS/TRS								
	Purchasing and Related	PO System & Vendor Database					*			
		Purchasing Process					^			
9		Payment Processing	_							
1		Employee Reimbursements		1						
	Expenditures	Credit Cards		*						
		croan carus								
		Facilities Maint. & Work Order Proc.								
10	Facilities	Custodial Overtime & Training								
10		Preventive Maintenance								
		Coordination with Outside Vendors								





# ♦ = Risk Assessment Complete ★ = Business Cycle Review Complete ✓ = Testing on Business Provided ♦ = Special Request Services Provided

				V	ears of	Source		
	<b>Business Process</b>	Business Process Categories	2016		2018			2021
11	<b>Capital Projects</b>	Construction Planning & Monitoring						
		Capital Project Funding & Payments						
		Recordkeeping & Reporting						
		Inventory/ Capitalization Policy						
12	Fixed Assets	Acquisition and Disposal						
		Inventory Process & Recordkeeping			1			
		Sales Cycle and System						
		Inventory and Purchasing						
13	Food Service	Free & Reduced Meals						
		Federal and State Reimbursement						
		Financial Reporting & Monitoring						
		General Controls	*			*		
	Extraclassroom	Revenue				*		
14	Activity Fund	Expenditures				*		
	Activity Fund	Reporting				÷		
		Reporting						
		Governance						
		Inventory						
1.5	Information	Network Security						
15	System	Application Security						
	~,	Physical Security						
		Disaster Recovery	1					
	Cybersecurity	General Controls					*	
16		Information & Asset Security					*	
10		Vulnerability Assessment					*	
		Incident Response & Recovery					*	
	Student Data Management	Registration & Enrolment		✓		*		
		Student Attendance		•		÷		
17		Student Attendance				÷		
1/						*		
		Student Eligibility						-
		Adult Education						*
	Pupil Personnel Services	Budgeting and Planning						
10		STAC Reimbursement						
18		Medicaid Reimbursement	*					
		RFP and Contracts						
		Flast Inventory and Maintanez			<u> </u>			
		Fleet Inventory and Maintenance	_		*			*
10	Transportation	Bus Routing and Planning	_		*			*
19		Labor and Supervision			*			*
		Contract Management			*			*
		Federal and State Reimbursement			*			*
	Safety & Security	Plan Development & Strategy		✓				
		Building Access & Security System			1			
20		Compliance and Incident Reporting						
		Safety & Security Monitoring						
21	Insurance / Risk Management	Actuary & Underwriting						
21		Policy Management						
		Claims Reporting						





## **Yonkers City School District**

## **2022 INTERNAL AUDIT PLAN**

### (Based upon November 2021 Risk Assessment Update) Exhibit II

### Cycle Reviews

- Human Resources
- Capital Projects

#### Key Control Testing Areas

- Out of District Tuition Reimbursement
- Payroll Overtime
- Facilities Work Order System
- Facilities Coordination with Outside Vendors
- Fixed Assets Inventory Process & Recordkeeping
- Student Registration & Enrollment
- Special Education Budgeting and Planning
- Special Education STAC Reimbursement

#### **Additional Internal Audit Services**

- Annual Risk Assessment Update as of November 2021
- NIST Gap Analysis
- External Audit Corrective Action Plan Monitoring
- Adult Education Cycle Recommendations Follow Up
- Annual Risk Assessment Update as of Nov 2022
- Mid-Year Status Reports
- Extraclassroom Activity Fund Training or Follow Up
- Other Internal Audit Services at the Request of the District

#### **Audit Committee Meeting**

• April 07, 2022

### <u>Status</u>

Planned for Apr-22 Commencement TBD

#### <u>Status</u>

Planned for Jul-22 Planned for Jul -22 Planned for Jul -22

#### <u>Status</u>

Draft Complete Planned for Sep-22 Planned for Nov-22 Planned for Nov-22 Planned for Nov-22 Planned for Jul-22 Upon Request As Requested