PELHAM UNION FREE SCHOOL DISTRICT

Corrective Action Plan Related to:
Office of the New York State Comptroller
Information Technology Report of Examination 2021M-134
For the Period July 1, 2019 - November 30, 2020
Dated April 2022

Audit Recommendation 1
Develop written procedures for managing network and financial application access, such as procedures to grant, change, and disable access to the network and specific software applications and periodically review user access and disable user accounts when access is no longer needed.

District Response
The District has already begun to implement this recommendation in full by the automatic provisioning of staff and student accounts. This feature was live for students in February of 2020 and for staff as of June 2021. Account creation and disabling is tied to the district's student information system for students and the district's financial system for staff. Previous users that were identified by the audit were disabled as of September 2021. With the district plans to restructure human resources, we will work on creating a formal procedure for account provisioning for staff and students.

Implementation Date: By December 31, 2022

Person Responsible: Assistant Superintendent for Curriculum, Instruction & Personnel, Assistant Superintendent for Business & IT Director

Audit Recommendation 2
Periodically review financial application access and limit access to ensure that access is based on job function.

District Response
The District has implemented this recommendation in full. The District Treasurer has been tasked with periodically (no less than annually) reviewing the list of users and their entitlements in the financial management system to ensure that all users are appropriate and have appropriate entitlements.

Implementation Date: Done

Person Responsible: Assistant Superintendent for Business & District Treasurer

Audit Recommendation 3
Develop, adopt, distribute and periodically update and test a comprehensive IT contingency plan that includes detailed guidance for continuing operations, key personnel and procedures for recovery of IT operations.

District Response
The District will implement this recommendation in full. The Information Technology (IT) Department has already implemented an IT specific disaster recovery plan that is in alignment to the National Institute of Standards and Technology (NIST) cybersecurity framework. This was created in partnership with the LHRIC and is continually evaluated and updated as needed. Further, the Business Office will work with the IT Department and BOCES-LHRIC to perform an annual test of the financial management system disaster recovery system.

Implementation Date: Currently in process; expected to be complete by October 2022

Person Responsible: Assistant Superintendent for Business & IT Director