



# Frankfort-Schuyler Central School District

605 Palmer Street Frankfort, NY 13340 | 315-894-5083 Superintendent | 315-895-7781 Business Office |

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December 12, 2022

Board of Education  
Frankfort-Schuyler CSD

RE: Draft IT Audit Response

Members of the Board of Education,

Below is the district response to the draft report issued by the State Comptroller's Office, their recommendation is noted as well as the districts response.

**Comptroller Recommendation #1-** Develop detailed SLA's with the district's IT service providers to address the District's specific needs and expectations for IT services and the roles and responsibilities of all parties. Ensure that the agreements include measurable performance targets, remedies if those targets are not met and the related costs.

**District Response #1-** The district has requested such documents from the BOCES and RIC providers. These documents do not exist. The district is being told that it is a work in progress at the RIC and BOCES. When the district contracts with the RIC and BOCES, an initial service request, per COSER, is completed. This request lists the COSER, Service Title and cost. In addition a catalog with a brief description of the service is available, however, not a SLA as recommended by NYS Office of the State Comptroller.

**Implementation Date:** Unknown

**Person Responsible for Implementation:** MORIC, BOCES

**Comptroller Recommendation #2-** Develop and adopt a comprehensive written IT contingency plan that provides adequate guidance on how the district plans to recover its critical IT operations in the event of an unexpected incident. Distribute the plan to all responsible parties and ensure that it is periodically tested and updated as needed.

**District Response #2-** While the district did have a plan for disaster recovery as they work directly with the RIC as part of the services they provided, it was not officially documented. As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has developed a DRAFT written disaster recovery plan as well as a Cybersecurity Incident Response Plan. These plans are in their second read at this time, with full adoption by the Board of Education expected by June 2023.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians, MORIC



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**Comptroller Recommendation #3-** Develop written procedures for tracking and inventorying IT assets. The procedures should address maintaining detailed inventory records (including specific information that should be recorded), tagging of items when received, updating the inventory records for changes in locations or assignments, the requirements for asset disposals and performing annual physical inventories.

**District Response #3** While the district does perform an annual physical inventory in house annually during the summer months, as well as a full physical inventory with an outside agency approximately every five years, this procedure was not officially documented. As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has developed a written Physical Device Procedure.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians. MORIC

**Comptroller Recommendation #4-** Ensure the district's IT asset inventory records include the detail necessary to adequately track and locate IT assets, including costs, acquisition date, building and room number and, if applicable, the name of the person to whom the equipment is assigned.

**District Response #4** While the district does perform an annual physical inventory in house annually during the summer months, as well as a full physical inventory with an outside agency approximately every five years, this procedure was not officially documented. All assets are tracked currently in QWARE, albeit absent the cost. As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has developed a written Physical Device Procedure. This procedure notes the name, category, serial number, tag number, assigned location and cost will now be added to all assets. All tracked in a tracking software (currently QWARE).

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians, MORIC

**Comptroller Recommendation #5-** Ensure an annual physical inventory of IT assets is performed and the results are compared to the inventory records. Take appropriate action to follow up on any discrepancies.

**District Response #5** While the district does perform an annual physical inventory in house annually during the summer months, as well as a full physical inventory with an outside agency approximately every five years, this procedure was not officially documented. All assets are tracked currently in QWARE, albeit absent the cost. As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has developed a written Physical Device Procedure. This procedure notes the name, category, serial number, tag number, assigned location and cost will now be added to all assets. All tracked in a tracking software (currently QWARE).

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians, BOCES, MORIC

**Comptroller Recommendation #6-** Ensure that proper authorization is obtained from the board prior to the disposal of donation of IT assets and removal from the inventory records.

**District Response #6** It is currently the districts practice to approve all disposals through the Board of Education, however, there were instances where this was missed. The district has reiterated and will continue to reiterate with it's IT staff that all disposals are to be Board Approved prior to the disposal of the items.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians



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**Comptroller Recommendation #7-** Develop and adhere to written procedures for granting, changing and disabling network user account access. The procedure should specifically address how the district will identify network user accounts that are no longer needed so they can be disabled in a timely manner.

**District Response #7-** As of the date of the Comptrollers Exit Conference on December 12, 2022, the district has implemented a new hire onboarding and off boarding official form to be used for all users on the system.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians, MORIC

**Comptroller Recommendation #8-** Perform a physical inventory of IT equipment, attempt to locate any missing equipment and updated inventory records accordingly.

**District Response #8-** While the district does perform an annual physical inventory in house annually during the summer months, as well as a full physical inventory with an outside agency approximately every five years, this procedure was not officially documented. All assets are tracked currently in QWARE, albeit absent the cost. As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has developed a written Physical Device Procedure. This procedure notes the name, category, serial number, tag number, assigned location and cost will now be added to all assets. All tracked in a tracking software (currently QWARE).

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians, BOCES, MORIC

**Comptroller Recommendation #9-** Promptly recover and secure IT assets that have been replaced and are awaiting disposal.

**District Response #9-** The district does its best to find secure locked locations to store these assets while awaiting disposal. Sometimes storage space is limited, but items should always be behind locked doors.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians

**Comptroller Recommendation #10-** Evaluate all enabled network accounts, disable any deemed unneeded and periodically review all network user account for necessity.

**District Response #9-** As of the date of the Comptrollers Exit Conference on December 12, 2022, the district in collaboration with the MORIC has reviewed all user accounts on the network and school tools for older users, both students and staff. All older users have been made inactive. This "audit" will take place at the school level on an annual basis going forward.

**Implementation Date:** Fiscal Year 2022-2023

**Person Responsible for Implementation:** Assistant Superintendent of Business & Technology, IT Technicians. MORIC



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Additional District Response: During the 2022-2023 fiscal year, the district has contracted with the MORIC Data Privacy and Security Team to provide an additional level of auditing on all IT systems to ensure the district is implementing the most up to date standards and review processes. This service not only assists with user audits, but also the following:

- Improve Compliancy with State and Federal Laws and Regulations
- Begin the NSIT Cybersecurity Framework Implementation
- Develop and Maintain comprehensive Data Privacy and Security Plans
- Review User Access and Permissions for all Administrative Systems
- Create Trainings Campaigns for Staff Focused around Data Privacy & Security
- Schedule and evaluate vulnerability scans of the districts network
- Monitor and Refine hardware and software inventory procedures
- Analyze scanning data to mitigate potential threats to create a vulnerability management program

The district would like to thank the comptroller's office for their time and effort to review the districts IT processes and look forward to the implementation of the corrective action plan.

Should you have any further questions, please feel free to contact me.

Best,

*Kacey Sheppard*

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