



Bedford Central School District

**Updated Risk Assessment Report
Covering the State mandate for the year ending June 30, 2018**

Bedford Central School District

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TOBIN & COMPANY

CERTIFIED PUBLIC ACCOUNTANTS, PC

To the Board of Education of the
Bedford Central School District
Bedford, New York

We have performed an update to our Risk Assessment as agreed to by the Bedford Central School District (the District). The purpose of this engagement is to ensure compliance with applicable New York State laws and regulations under the Fiscal Accountability Initiative for the fiscal year ending June 30, 2018.

Our report assigns risk assessment scores and levels to the different processes of the District, and highlights weaknesses in internal controls as well as valuable controls that are already in place. This report also provides a recommended area where an in-depth review should be performed.

We are pleased to have had the opportunity to serve you and look forward to reviewing this report in detail with you. We would also like to thank the Board of Education and the employees of the Bedford Central School District for their time and assistance during our engagement.

Sincerely,

Tobin & Company
Certified Public Accountants, PC

Purchase, New York
January 22, 2018

Executive Summary

Since the last Risk Assessment, the District experienced significant employee turnover in several key Business Office positions: Assistant Superintendent for Business, Director of Facilities, Director of Human Resources, and a Human Resource Clerk. The Purchasing Agent position was eliminated and the role was given to the Assistant Superintendent for Business. While many of the existing internal controls and processes remained the same, we found some of the operating procedures were disrupted as a result of these changes. Conversely, we noted the District had also implemented new procedures to improve existing processes. Based on our findings some of the risk scores in certain areas were affected.

Below is a summary of our observations. Further detail can be found in the body of this report:

Notable improvements to internal controls and procedures since the last risk assessment:

- 1) The District hired a new Director of Buildings and Grounds.
- 2) The Treasurer developed a position control sheet in Excel that tracks contractual changes by employee, budget code, and building.
- 3) The benefits enrollment process is now performed by the Human Resources Department.
- 4) Information Technology has a database of passwords.
- 5) The District developed a contract calendar to highlight the expiration of vendor contracts and/or bidding obligations.
- 6) Effective July 1, 2018, the District will submit for Medicaid reimbursement.
- 7) The District is now reconciling Aramark reports to Nutra kids reports.
- 8) The District began to utilize the Positive Pay feature with their bank.
- 9) The Claims Auditor is reviewing open purchase orders to prevent payments from being applied to it twice.

Summary of newly noted areas for potential improvement:

- 1) The District should consider implementing procedures to track vehicle mileage and fuel usage by vehicle.
- 2) The District may want to consider adding additional positions to take on purchasing, transportation, and budget oversight.
- 3) There are no written procedures in place for the Human Resources Department.
- 4) The District has an employee position control database. The database is maintained by the Treasurer and used by the Business Office.

Summary of areas for potential improvement noted in previous reports:

- 1) The procedures and duties of the Human Resource Department are not clearly defined. There is uncertainty between Human Resources and other various Business Office departments as to who is responsible for which duties.
- 2) Due to the recent turnover in the Human Resource Department, it may be beneficial for the District to review the longevity information within Finance Manager.
- 3) A review of the monthly benefit changes should be performed by someone independent of the Benefits function.
- 4) The information to process Non-Resident Special Ed invoices are received late and cause the receipt of payment to be delayed.
- 5) The District should consider implementing an automated time clock system.
- 6) Only one person enrolls employees for benefits and there is no independent review.

Bedford Central School District

Risk Assessment Overview

At the request of the Board of Education of the Bedford Central School District "the District" we have performed a Risk Assessment of several areas of district operations. Our assessment includes an analysis of business procedures and activities. The risk assessment considered qualitative, quantitative, technological, and human elements of the District's operations.

During our engagement we performed the following procedures:

We interviewed key personnel, including top administration, mid-level management, and business office employees.

We evaluated forms and documentation used in the daily business processes.

We evaluated internal controls, policies and procedures.

We evaluated technology used by the District as well as the security of the technology.

We prepared flowcharts for key operational areas.

We reviewed the audit reports issued by the State Comptroller's Office as well as the District's External Auditors, and previous internal auditors. In addition, we reviewed previous audit comments and the District's action plan.

During our engagement we interviewed the following key personnel:

Angelo Rubbo, Assistant Superintendent for Business and Administrative Services

Nancy Sasso, District Treasurer

Patricia Gomez, Senior Bookkeeper

Patricia McKenna, Accounts Payable Clerk

Rob Gimigliano, Director Buildings and Grounds

Marianne Morgante, Accounts Payable for Buildings and Grounds

Judy Schumacher, Lead Payroll Clerk

Laura McGuire, Payroll Clerk

David Gee, Director of Technology

Teri Gardiner, Extra Classroom Activities Treasurer (High School)

Fran Cortina, Food Service Director (Aramark)

Christopher Weir, Claims Auditor

Anne Marie Bazyk, Executive Assistant for Human Resources

Elizabeth Walsh, Personnel Assistant for Human Resources

Stacey Haynsworth, Director of Human Resources & Development

Explanation of Risk Ratings

The risk assessment quantifies scores in various areas of the operations of the District. The scores determine if a particular area is graded low, medium, or high risk. The following illustrates the range of possible scores:

Low Risk	21 - 49
Medium Risk	50 - 77
High Risk	78 - 105

Risk levels were assigned to each area based on six key variables.

- 1) *Dollar Volume* - The higher the dollar volume, the higher the value assigned.
- 2) *Adequacy of Personnel* - Values assigned depend on personnel having proper qualifications, and that there is enough staff to perform proper internal controls.
- 3) *Complexity of Activity* - Different reviewed areas are more complicated and allow more opportunities for fraud or misappropriations.
- 4) *Management Interest* - If management places a priority, or expresses interest in a particular area, it is awarded a higher risk value to ensure that attention is paid to that area.
- 5) *Adequacy of Procedures* - If there are proper procedures that are understood and followed, risk levels are significantly reduced.
- 6) *Adequacy of Internal Controls* - Lack of controls could mean that procedures are not followed correctly, increasing risk levels.

In order to calculate the Risk Score for each reviewed area, we have to determine the risk level for each variable. The following is an illustration of the calculation which assigns risk scores to each variable:

A = Rank - Each variable is ranked in order of its importance from 1-6 (6 being most important).

B = Descriptive Value - Each variable is scored with a value from 1-5 (5 being highest risk) depending on our observations for that particular area.

A x B = Weighted Value - Calculated by multiplying each variable's rank by its descriptive value.

When we have computed a score for each variable, they are totaled giving us the Total Risk Score for the reviewed area being evaluated.

**It should be noted that not all of these variables can be controlled by the District. For instance, the dollar volume for receipts, payables, and payroll will always be high. Therefore, even with perfect controls these areas would not be considered low risk. This should be taken into consideration when reading the results of our scoring.*

Bedford Central School District

Risk Ratings- Results

In the illustration below we list each operational area, its previous assigned risk score, and the updated risk score, and level.

Area of Review	Current Risk		Previous Risk	
	Score	Level	Score	Level
Human Resources	75	Medium	78	High
Payroll	70	Medium	68	Medium
Employee Benefits	69	Medium	68	Medium
Purchasing and Payables	68	Medium	66	Medium
Facilities and Capital Assets	65	Medium	67	Medium
Extra Classroom Activities	63	Medium	61	Medium
Food Service	58	Medium	58	Medium
Revenue and Receipts	53	Medium	55	Medium
Information Technology	52	Medium	52	Medium
Transportation	50	Medium	50	Medium
Government Aid and Grants	47	Low	47	Low

The history of intensive reviews performed on the District's operational areas is as follows:

Intensive Review History	
Employee Benefits	<i>completed June 2012</i>
Purchasing and Payables	<i>completed June 2014</i>
Board Governance	<i>completed June 2015</i>
Facilities and Capital Assets	<i>completed June 2016</i>
Human Resources	<i>completed June 2013 and 2017</i>

Recommendation for next review area: Extra Classroom Activities

Our review will focus on the following items, but not be limited to:

- Detailed understanding of the current processes of Extra Classroom Activities.
- Determine if internal controls are adequate over receipts.
- Detailed interviews of District personnel and documentation of these interviews through industry accepted checklists.
- Review of cash receipts for each club focusing on how funds are collected and accounted for.
- Review of the process for check disbursements.
- Comparison of current processes against best practice of other school districts.

HUMAN RESOURCES - Risk Score: 75

This area is a highly significant one, not only due to its relationship with the payroll process, but also due to the complexity and sensitivity in maintaining its relations with its employees' representative unions, related contractual obligations and compliance requirements. It is important in any school district that both, the Human Resource Department and Payroll Department, work jointly to effectively process the District's largest expense. The Board of Education engaged our firm to perform an intensive review of Human Resources. Our report dated January 19, 2018 noted the District has good policies in place, and follows them to the best of their abilities. The review also noted areas for potential improvements. The details of those findings can be found in that report.

Internal control changes made since the last risk assessment report:

- 1) A new form was created to notify staff of new hires and changes. This form "staff action notice" is available to the Human Resource and Payroll Departments through the Google share drive.
- 2) The Human Resource Department creates a help desk ticket for IT. IT will then create employee profile.

Newly noted observations and recommendations:

- 1) Observation: There are no written procedures in place for the Human Resources Department.
Recommendation: Human Resources should document their daily processes to help prevent delayed operations in the event of unexpected or long absences by personnel.
- 2) Observation: The District has an employee position control database. The database is maintained by the Treasurer and used by the Business Office.
Recommendation: The District should consider shifting the responsibility of the database to Human Resources since they are the Central Department for employee staffing.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation: The Human Resource Clerks are diligent in their review process in determining employee longevity and salary advancement credits. While we did not note any specific error, due to employee turnover the past few years, it could be possible that the longevity information in Finance Manager and the salary advancement credit information in MyLearningPlan is incorrect.
Recommendation: We recommend the District perform a review of the longevity information in Finance Manager as well as the MyLearningPlan information for accuracy. Until that exercise is performed, staff should be instructed to take diligent steps in ensuring the information used is accurate.
- 2) Observation: Employee attendance is maintained in Finance Manager by the Human Resource Clerk. There is no independent review of the current information, or annual rollover.
Recommendation: The District should consider conducting periodic reviews, performed by a person other than the Human Resource Clerk. The review should be performed on the current information as well as the annual attendance rollover

HUMAN RESOURCES (continued)

Current Assessment

As previously mentioned, this area has seen significant employee turnover during the past few years. Since our last risk assessment report, the District hired a permanent Director of Human Resources. We noted the Human Resources Director and Human Resources Clerks are trying to develop new and efficient procedures, while managing their current duties.

During our interviews, we noted that communication to other Business Office departments is still not operating effectively or timely. We also found many typical human resource functions are handled by other departments, which has created an unclear set of responsibilities.

PAYROLL - Risk Score: 70

Payroll is an area in which the high dollar volume in relation to the District budget inherently makes it a "higher risk" area. Payroll is also an area that is generally susceptible to fraud. These two factors make it difficult for the risk level in this area to ever be rated low, regardless of the controls in place.

Internal control changes made since the last risk assessment report:

None noted.

Newly noted observations and recommendations:

None noted.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation: The District currently uses manual paper time sheets to track the work hours of hourly employees. These are reviewed by supervisors and manually signed. Additionally, these are manually entered by the Payroll Clerk into Finance Manager. As with any other manual process, manual entry leaves room for human error. Additionally, the use of manual time sheets makes verification of actual hours worked difficult.
Recommendation: The District should consider adopting the use of an electronic time tracking system such as Timepiece, which integrates with Finance Manager. This system would eliminate manual entry of data, and would verify exact times of employee arrivals and departures. The approval process by supervisors would also become automated, providing accurate records of approvals.

Current Assessment

Since our last review, the Lead Payroll Clerk retired. The second Payroll Clerk took her position and the District hired a new clerk to serve as the second Payroll Clerk. Changes in employees can increase inherit risks if there is a learning curve associated with the new employee, but it can also bring a new perspective on processes. In the past, the scores slightly increased over prior risk assessments primarily due to its relationship with the Human Resource department, whose risk rating is high. While the current processes within the payroll function are sufficient to detect errors, the processes of preventing errors have weakened. The risk level remains at *Medium*

EMPLOYEE BENEFITS - Risk Score: 69

The largest potential risks in this area for any District are providing benefits for individuals who are no longer eligible, and failure to properly bill the individuals who are required to contribute to their benefits. In this case, as a self insured District, there is the additional risk of paying for claims that are billed to the District that are inaccurate, or are for ineligible enrollees.

Internal control changes made since the last risk assessment report:

- 1) The benefits enrollment process is now performed by the Human Resources Department.

Newly noted observations and recommendations:

None noted.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation: The Senior Bookkeeper is responsible for adding and removing employees to the District insurance plans. She is also responsible for calculating the employee benefit contribution amount. There is no independent review of the changes made to the health insurance policy.
Recommendation: Twice per year, the Senior Bookkeeper prints out an insurance participant list and gives it to the Payroll Department to compare against active employees. While this is a good process, it does not prevent an authorized addition to the coverage outside of those two periods. Because there is little segregation in these functions, we recommend the District assign an independent employee to perform periodic reviews of the insurance invoice and spot check the employee contribution amounts.
- 2) Observation (Best Practice): There is no written procedure manual for the Benefits cycle, nor is anyone cross-trained.
Recommendation: The District should develop a written procedure manual and/or cross train another employee in the event, the Human Resources Clerk cannot perform her duties. This will help ensure operations can continue without disruption and good procedures and controls remain in effect

Current Assessment

As previously mentioned, the Senior Bookkeeper will no longer enroll and change employee's benefits into the plan. These procedures will now be done by the Human Resources Department. The District should consider an intensive review of this area in the future. The Risk Level remains at *Medium*.

PURCHASING AND PAYABLES- Risk Score: 68

Purchasing and Payables are assessed together due to their close relationship. The District follows New York State purchasing regulations. We reviewed the procedures and documentation for purchases of supplies, employee reimbursements, and contract purchases. As with human resources and payroll, this area's rating is affected by its significant dollar value and its susceptibility to fraud.

Internal control changes made since the last risk assessment report:

- 1) The District began to utilize the Positive Pay feature with their bank.
- 2) The Claims Auditor is reviewing open purchase orders to prevent payments from being applied to it twice.
- 3) The District developed a contract calendar to highlight the expiration vendor of contracts and or bidding obligations.

Newly noted observations and recommendations:

None noted.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation (Best Practice): The District's Claims Auditor performs the audit of claims subsequent to the printing of checks.
Recommendation: In many NYS Comptroller issued audits, the State recommends reviewing claims before they are printed and again after they are printed. Based on our observations, the current Claims Auditor is very thorough in his review process.

Current Assessment

There have been no changes to the processes involving purchasing and payables. Overall, the District has good internal controls. Due to the recent significant Business Office employee turnover, the risk rating remains at *Medium*.

FACILITIES AND CAPITAL ASSETS - Risk Score: 65

Maintenance is an important part of keeping the District up and running. The District employs skilled maintenance and custodial workers for the repair and maintenance of the District's buildings and grounds. The Board of Education engaged our firm to perform an intensive review of Capital Projects. Our report, dated September 26, 2016, noted the District has good policies in place, and follows them to the best of their abilities. The review also noted areas for potential improvements. The details of those findings can be found in that report.

FACILITIES AND CAPITAL ASSETS (continued)

Newly noted observations and recommendations:

- 1) Observation: Currently the District does not keep track of District vehicles mileage and fuel usage by vehicle. No reports are generated to analyze if vehicles and fuel are used for non District activities.
Recommendation: The District should consider introducing a mileage log sheet per vehicle. Every time an employee uses the vehicle, the beginning and ending mileage should be recorded. This will help track the mileage by vehicle and employee. It will assist in generating reports and help analyze fuel used. Generating reports on a monthly basis can help determine if fuel usage is more than it should be.
- 2) Observation: The District owns the software School Dude to help with the work order process. The software is not being used to the fullest by the Buildings and Grounds Department. Currently, the District is using Technology Help Desk Software to keep track of work orders.
Recommendation: Although Help Desk is helpful in keeping track of work orders and their progress, we believe using School Dude would be more beneficial. Not only will it be beneficial with the work order system but it will be beneficial for facility usage billing and tracking.
- 3) Observation: The District uses manual time sheets for employee over-time. Sign in sheets may be easily manipulated. The largest weakness associated with manual sign in sheets is the potential for employees to sign in on each other's behalf.
Recommendation: Although we didn't note any discrepancies, we strongly encourage the District to purchase and implement an employee time clock, Time Piece. This automated system identifies each employee at sign in by reading fingerprints, eliminating the possibility of employees signing in for each other. Additionally, it will keep accurate records of time signed in and out.
- 4) Observation: The District does not review alarm system reports for analysis.
Recommendation: The District should review alarm system reports from time to time to confirm that employees are not entering the building after hours.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation (Best Practice): The facility usage process is done manually. Invoices are generated in Microsoft Word.
Recommendation: We recommend the District automate the facility usage process using School Dude. We noted a few neighboring school districts using it for the entire process and noted how well it works. Since the District already has School Dude for its work order system, the District should consider utilizing it for this process.
- 2) Observation: Part of the District accounts payable cycle requires a signed receiving copy to be returned to the Business Office when items are received. We noted in our interviews, there are times when signed receiving copies are not submitted to the Accounts Payable Clerk.
Recommendation: The District should remind employees about the District's accounts payable process and the importance of following those procedures.

FACILITIES AND CAPITAL ASSETS (continued)

Current Assessment

Since our last risk assessment, the District hired a Director of Buildings and Grounds to fulfill the vacant position. As described above, the District implemented Help Desk as a work-order system to improve the work-flow process.

The risk level remains at *Medium*

EXTRA CLASSROOM ACTIVITIES – Risk Score: 63

Although this is not a part of the District's budget, Extra Classroom Activities is an area where student funds may be handled by many individuals before being deposited into the clubs bank account. Although the dollar amount is relatively low, this is an area where the risk of theft can be high.

Internal control changes made since the last risk assessment report:

None noted.

Newly noted observations and recommendations:

None noted.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation (Best Practice): The Extra Classroom Treasurer currently uses Excel to track cash balances as well as detail of receipts and disbursements. Disbursement checks are manually typed on a typewriter. Because of the manual nature of the books it is difficult to generate reports by club, or to perform transaction searches.

Recommendation: We suggest the District implement an accounting software package such as, "Schoolbooks." Using accounting software would reduce the amount of time necessary to perform the extra classroom function. It would also drastically improve reportability. Checks can be printed from this system which eliminates redundancies such as typing the check, and then having to separately "book" it to a ledger.

Current Assessment

The High School Extra Classroom Treasurer will be leaving the District in January. As previously stated in other areas, change in employee can increase inherit risk is there is a learning curve associated with new employee, but it can also bring a new perspective on processes. The District has not performed an intensive review of this area, and should consider an intensive review in the future. The Risk Level of *Medium* is unchanged.

FOOD SERVICE - Risk Score: 58

Food service is run by an independent vendor (Aramark). This limits the need for the District to manage this area of operations. Although this area is handled by an outside vendor, this is where the majority of cash changes hands within the District. Therefore, strong controls are necessary to ensure that the possibility of fraudulent activity is limited.

Internal control changes made since the last risk assessment report:

- 1) The District is now reconciling Aramark sales reports to Nutra kids reports and bank deposits.

Newly noted observations and recommendations:

None noted.

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation: The cashiers count their drawers at the end of the period. The count report, on the cash register, is not closed within the system, until it is recounted by a second Food Service person. The District should limit the handling of cash when-ever possible. In our experience, when cash is handled by more than one person, the risks of misappropriation increases.

Recommendation: The cashiers should close out the count report and immediately place the money in a sealed deposit bag. Any discrepancies between the register count and the actual deposit will be limited to one person. This would eliminate the risk of an employee skimming cash and falsifying register reports.

Current Assessment

The food service operation remains outsourced to a third party vendor. The vendor has its own set of controls and procedures which it develops and implements. The procedures and controls are similarly found in other school districts. The Food Service risk remains at *Medium Risk*.

REVENUES, RECEIPTS AND REPORTING- Risk Score: 53

This area includes all budget, accounting, financial reporting and cash management functions of the District. The factors affecting this area included strategic planning impact and materiality to the financial statements; internal control environment and documentation of internal controls.

Internal control changes made since the last risk assessment report:

- 1) Effective July 1, 2018, the District will submit for Medicaid reimbursements.

Newly noted observations and recommendations:

None noted.

REVENUES, RECEIPTS AND REPORTING (continued)

Unresolved Observations and Recommendations from prior Risk Assessment Reports:

- 1) Observation: The information used to process non-resident student Special Education invoices are sometimes submitted late to the Bookkeeper for billing. As a result the receipt of payment is delayed.
Recommendation: The District should review the process and develop a solution to speed up the timeliness of the communication.

Current Assessment

The District is implementing changes to certain Business Office processes that will increase transparency and improve budgeting analysis. The District is also looking at various ways to increase ancillary revenue and or improve efficiency. The recent change in employee turnover has provided valuable fresh perspectives and ideas into this area. The Risk Level remains at *Medium*.

INFORMATION TECHNOLOGY - Risk Score: 52

Technology is ever changing and so are its dangers. Based on our interviews we believe that the District's systems and data are secure, but that can change in an instant. Technology must be monitored closely and vigilantly at all times, for the safety of information, as well as the students using computers within the District.

Internal control changes made since the last risk assessment report:

None noted.

Newly noted observations and recommendations:

None noted.

Current Assessment

There have been very little procedural changes in this area since the last Risk Assessment. The Department performs necessary security upgrades to its operating systems as needed. Due to its nature, it is nearly impossible for the risk level of this area to ever be at a low level. The Risk Level remains at *Medium*.

TRANSPORTATION - Risk Score: 50

The District's transportation operation has a third party contracted vendor to provide transportation for District students. Bus routes and scheduling of pickups are developed internally. As part of the agreement with the third party vendor, the District is responsible for purchasing fuel for the vendor's routes. The total fuel responsibility of the District is capped by the contract based on live miles. Additionally, the District stores fuel on its premises for its own vehicles and has its own pumps.

TRANSPORTATION (continued)

Current Assessment

Since the last two Risk Assessments, the District's Transportation Director has remained vacant. The position has been assumed by the Superintendent of Business and two District employees. The District continues to use a third party vendor for all of its busing activities, and the procedures within the District have not changed. The risk level of *Medium* remains the same.

GOVERNMENT AID AND GRANTS - Risk Score: 47

School Districts are entitled to a variety of program aid from the state and federal government. Government Aid and Grants can be a substantial source of funding for public education. The highest risk related to Government Aid and Grants would be that the District is not receiving all funds that it may be entitled to.

Internal control changes made since the last risk assessment report:

None noted.

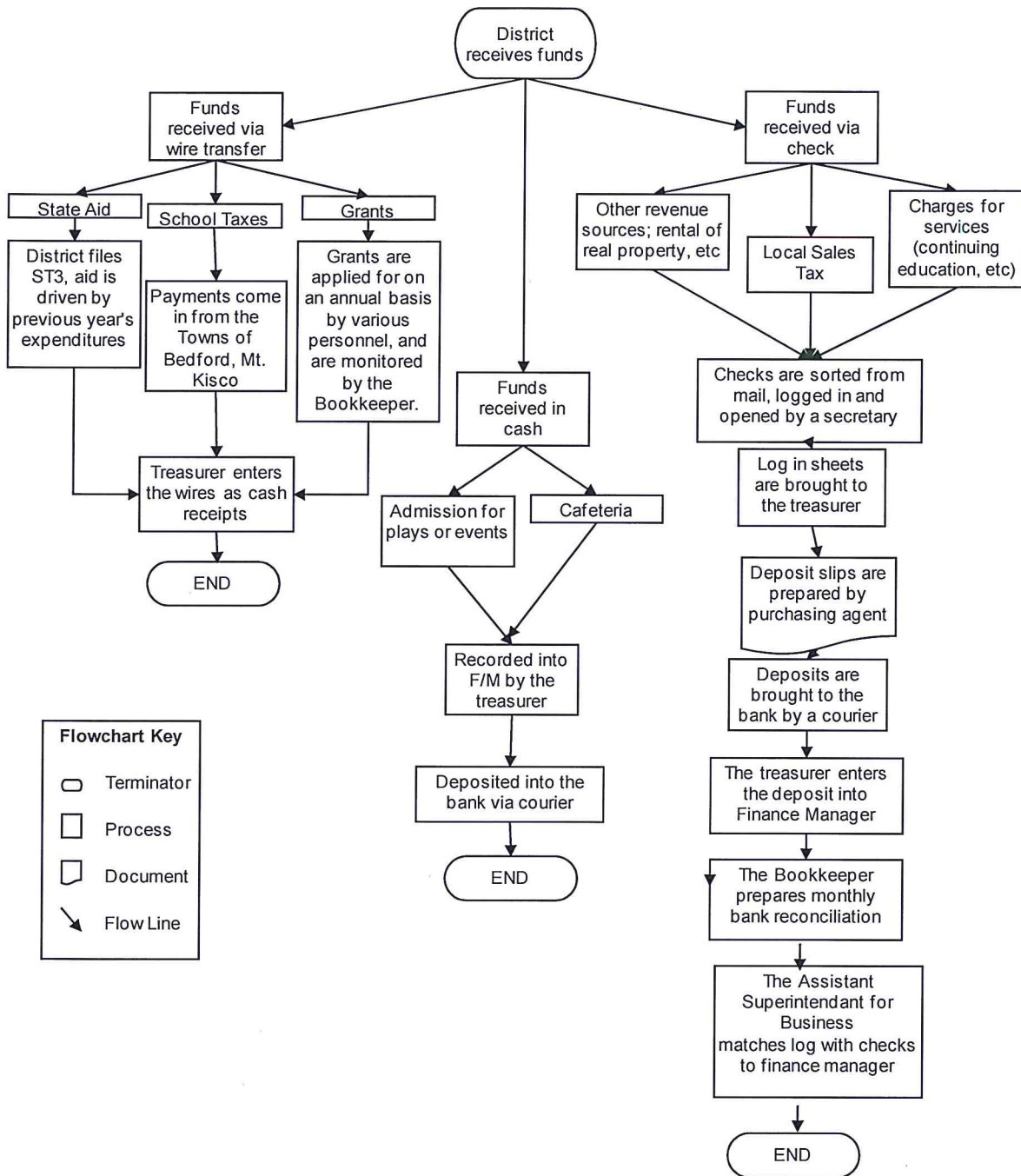
Newly noted observations and recommendations:

None noted.

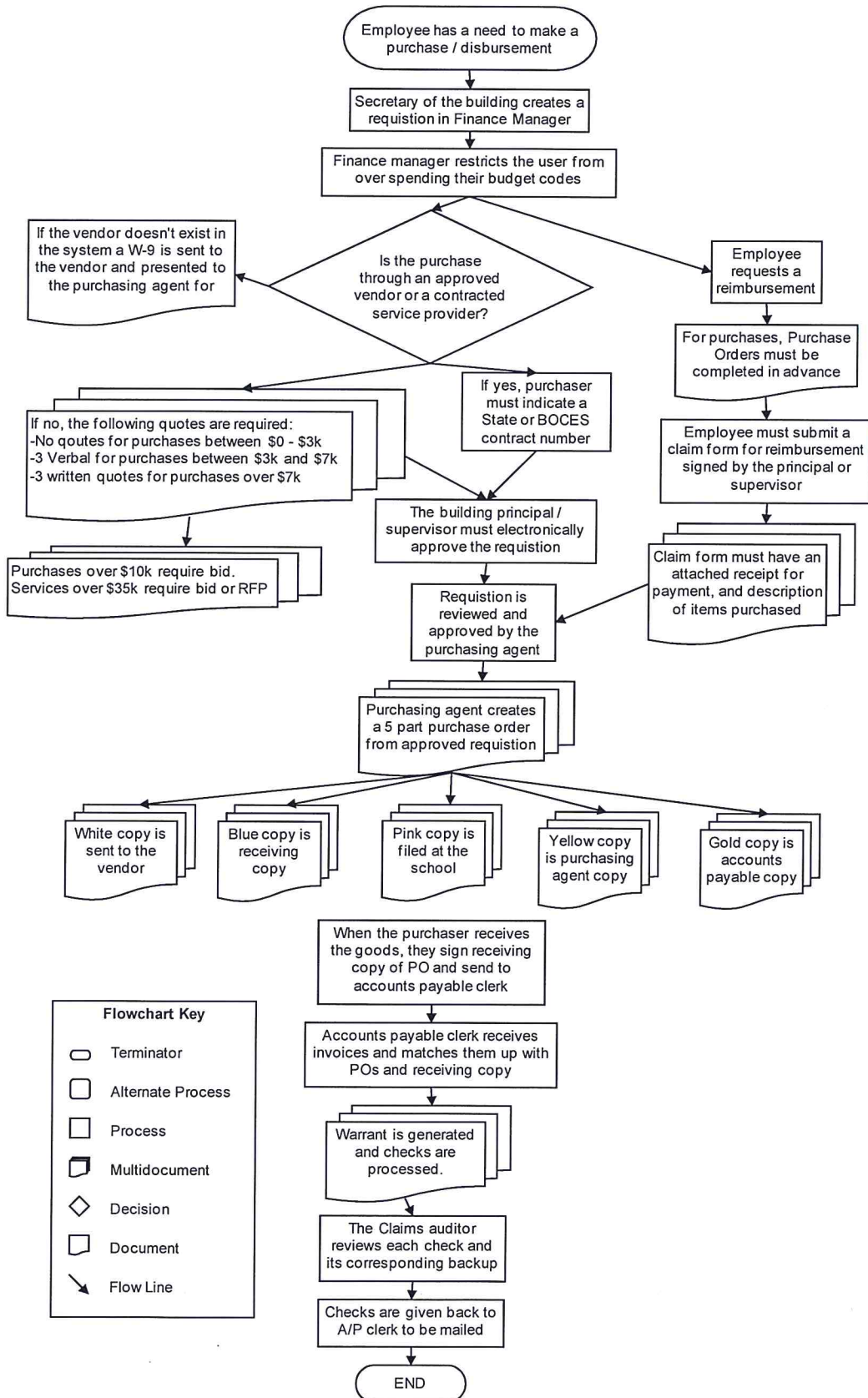
Current Assessment

Due to the controls in place, and the nature of receipts from grants (electronic wires), and Government required reporting, we were able to rate this area as *Low Risk*.

Flow Charts of Receipt Cycle

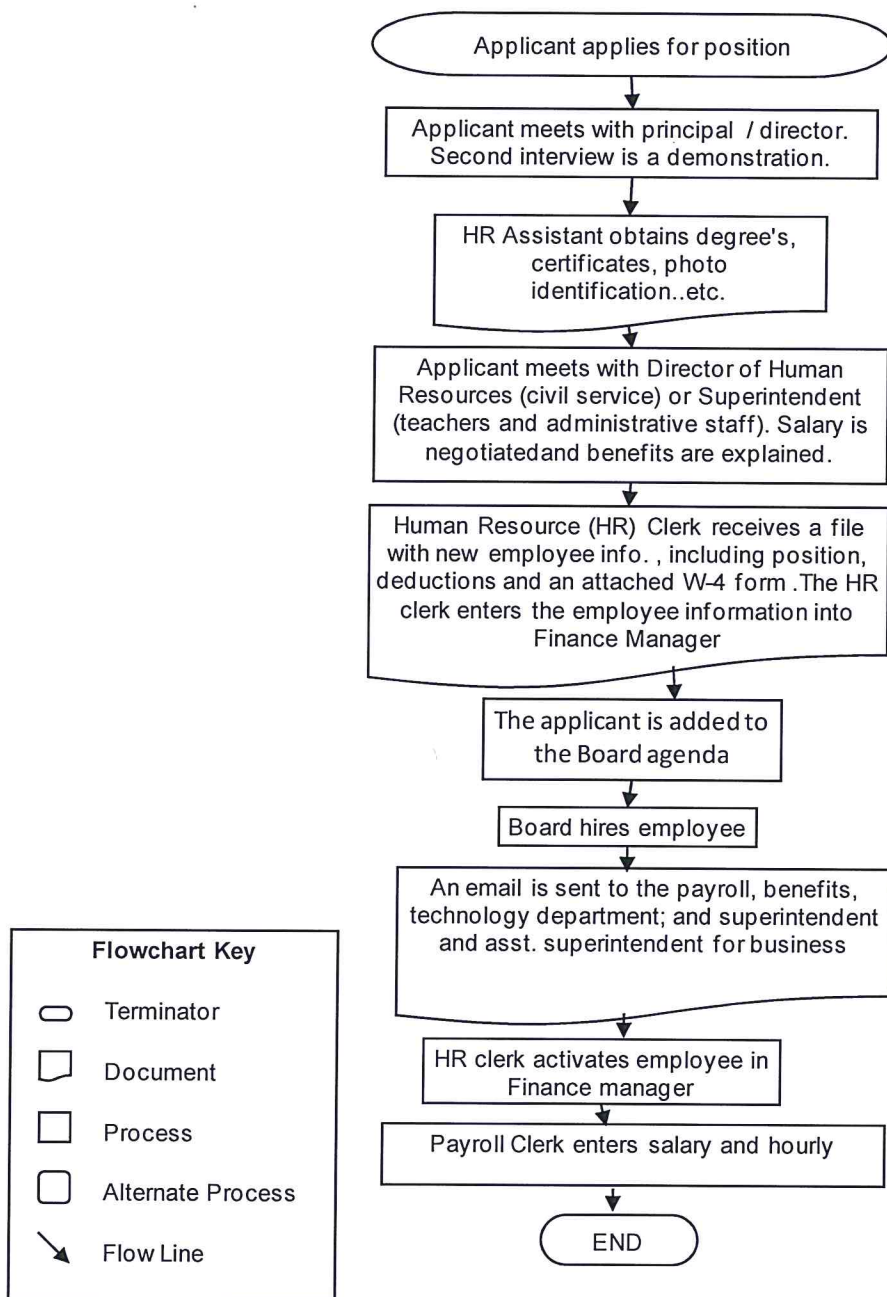


Flow Chart of Purchase Cycle

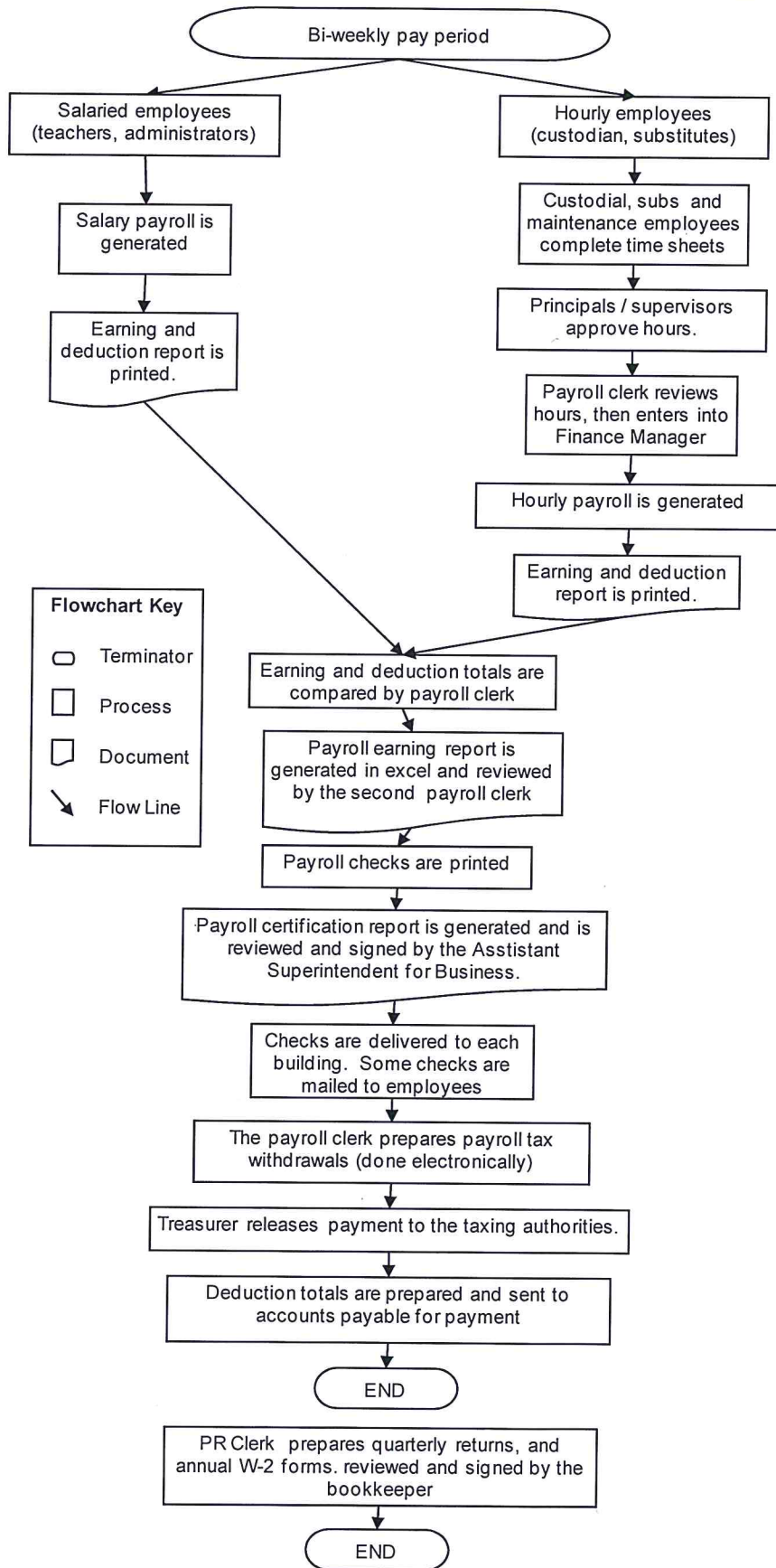


Bedford Central School District

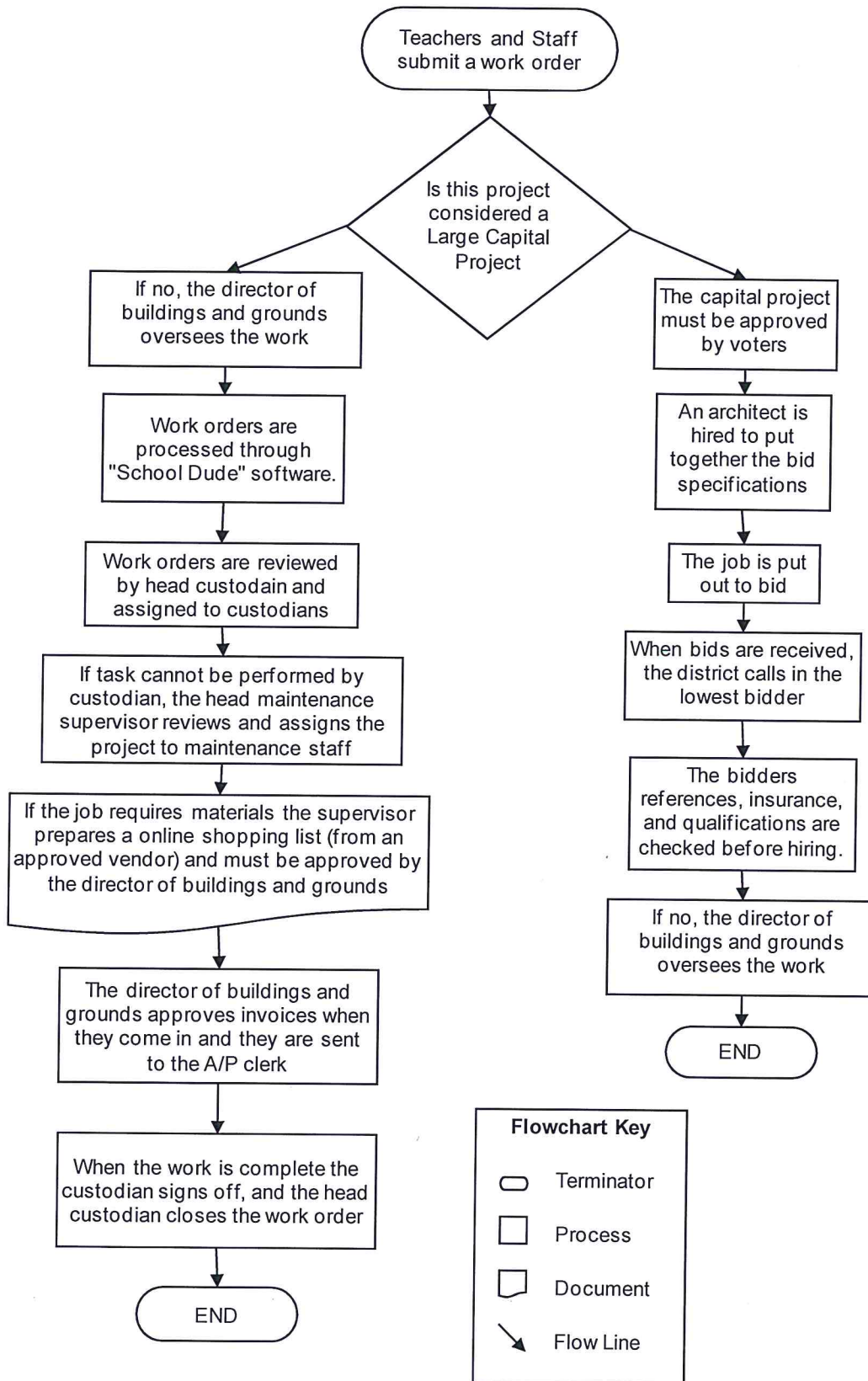
Flow Chart of Human Resources Cycle



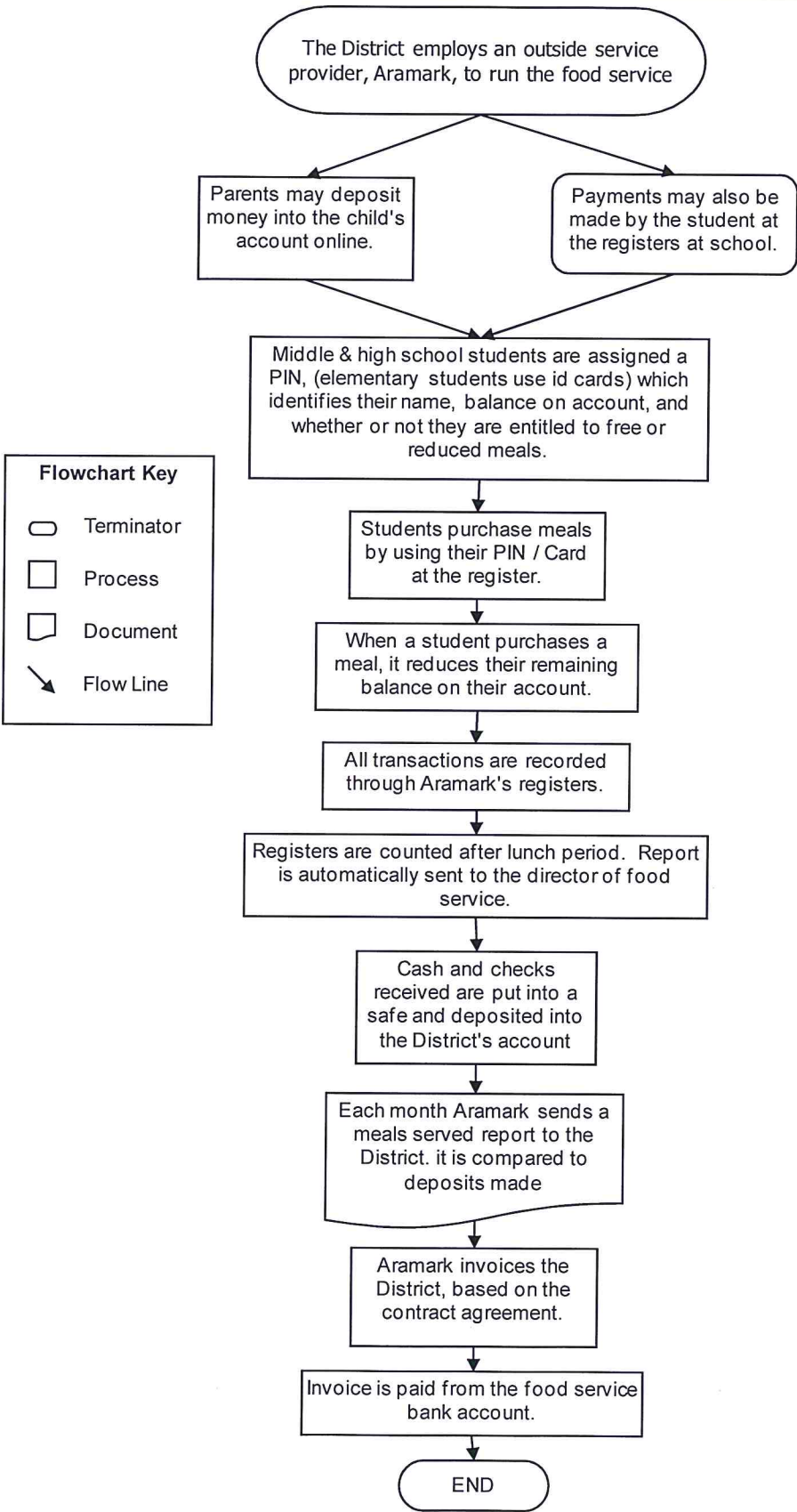
Flow Chart of Payroll Cycle



Flow Chart of Capital Projects



Flow Chart of Food Service



4265 WEBSTER-16/17

General Ledger

For the Period From Dec 1, 2017 to Dec 31, 2017

Filter Criteria includes: 1) IDs from 10006 to 10006. Report order is by ID. Report is printed with shortened descriptions and in Detail Format.

Account ID Account Description	Date	Reference	Jrnl	Trans Description	Debit Amt	Credit Amt	Balance
10006	12/1/17			Beginning Balance			
Transfers	12/31/17	ytd	GENJ		52,915.00		
	12/31/17	ytd	GENJ			30,404.73	
	12/31/17	ytd	GENJ			50,092.00	
				Current Period Change	52,915.00	80,496.73	-27,581.73
	12/31/17			Ending Balance			-27,581.73