



Sweet Home Central School District of Amherst and Tonawanda

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Asst. Superintendent for Finance & Plant Services*

Sweet Home Central School District CORRECTIVE ACTION PLAN Internal Control Report YEAR ENDED JUNE 30, 2023

February 13, 2024

This Corrective Action Plan is in response to the recommendations made in the internal control report dated February 7, 2023 for the Sweet Home Central School District.

Information Technology

1. **PowerSchool software application** – Internal Audit noted that the PowerSchool software application was not up to date with the most current version.

Internal Audit noted that while software and operating systems were generally updated, there was a newer version of the PowerSchool software application available at the time of our procedures.

2. **Set of formal, documented policies and procedures** – Internal Audit noted the IT department does not have a set of formal, documented policies and procedures.

Internal Audit noted that, while the District does have some general IT-related policies through the BOCES-provided board policy book and at times utilizes BOCES support resources, the District does not have formal, documented computer standards, policies, and procedures over the various computer activities being performed by the IT department.

3. **Contingency and Business Continuity Plan** – Internal Audit noted While a Cybersecurity Incident Response Plan is in place, the District does not have a formal written IT contingency and business continuity plan, in accordance with District Policy #5674 (Data Networks and Security Access).

Internal Audit noted that the Systems Engineer indicated that he is aware of the procedures necessary to be addressed in the event of a disaster impacting or a disruption to the District's IT network, there is currently no documented written plan. A written, formalized IT contingency and business continuity plan provides clear steps to follow and assigns key responsibilities to key staff in the event of a major disaster or disruption, such as flooding or other disruptive event.

4. **Information Security Awareness Training** – Internal Audit noted the District does not currently provide formal, annual information security awareness training to faculty and staff.

Internal Audit noted that the District provides various informative updates regarding phishing schemes to faculty and staff through email correspondence, no formal information security training program is provided.

Formal information security awareness training, provided on an annual or regular basis, provides users with the knowledge to understand and safely use the District's network and IT assets.

Food Service Operations

1. **District's Point of Sale System (POS)** – Internal Audit noted certain third party locations for which the District provides food service operations do not utilize the District's point-of-sale ("POS") system.

Internal Audit noted that presently the locations that do not utilize the District's POS system instead reference hard copy student rosters for tracking student meals served.

2. **Pricing on Inventory Listings** – Internal Audit noted that the items' prices included on the monthly inventory listings maintained by the food service department did not reflect the most current price being charged by the vendor.

Corrective Actions Taken and Planned:

Information Technology

1. **PowerSchool software application** – The District agrees that the PowerSchool software application was not up to date with the most current version at the time of audit procedures. The District maintains that there are instances where certain software may only compatible with older versions of the operating system.

Corrective Action: The Information Technology Department, in conjunction with the District's Data Office and BOCES Support Services, will work to bring our PowerSchool platform to the latest version which will allow us to continue to operate efficiently and ensure all other software programs that the District uses are compatible with PowerSchool and also function appropriately.

Effective: *September 1, 2024*

2. **Set of formal, documented policies and procedures** – The District agrees there are no formal, documented procedures over the various computer activities being performed by the IT Department. There are, however, Board of Education policies that guide the work done by the department.

Corrective Action: The District Director of Technology and Systems Engineer will develop a set of formal, documented IT procedures that would be put in place in the events of a *long-term absence of department leadership*. *Specific examples on procedures would include, but not be limited to, change management and routine software updates.*

Effective: *September 1, 2024*

3. **Contingency & Continuity of Business Plan** – The District agrees that there are no written IT contingency and continuity of business plan in accordance with District Policy #5674. It is important to note that the District does have written plans in terms of a cybersecurity incident

Corrective Action: The Information Technology Department, in conjunction with the Business Office, will develop a set of formal, written procedures that provide clear steps to follow and assign key responsibilities to staff in the event of a major disaster or disruption.

Effective: *September 1, 2024*

4. **Information Security Awareness Training** – The District agrees that it does not currently provide formal, annual information security training to faculty and staff. The District is taking steps to enhance security including restricting access to our wireless network, implementing two-factor authentication into email and forcing password changes to certain programs and email.

Corrective Action: The Information Technology Department will develop a brief training on information security awareness that will include training on EdLaw2d. The training will be shared with annual trainings at the start of the school year.

Effective: *September 1, 2024*

Food Service Operations

1. **District Point of Sale System** – The District agrees with Internal Audit findings that there is no point-of-sale (POS) systems at off-site locations (St. Christopher School, Summit Academy, Edge/BOCES).

Corrective Action: The District is moving to a new POS system that will allow this citation to be corrected. Mosaic will be installed in time for the start of the 2024-25 school year.

Effective: *September 1, 2024*

2. **Pricing on Inventory Listings** – The District agrees with Internal Audit findings that items' prices included on the monthly inventory listing did not reflect the most current pricing being charged by the vendor.

Corrective Action: The Food Service Department has implemented procedures to correct the issue and current pricing will be reflected on inventory sheets.

Effective: *February 12, 2024*