



Mount Sinai School District

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

June 2023

INDEPENDENT ACCOUNTANTS' REPORT ON APPLYING AGREED UPON PROCEDURES

The Board of Education
Mount Sinai School District

We have performed the procedures enumerated below, which were agreed to by the Mount Sinai 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 December 2022 Risk Assessment by performing certain internal audit procedures pertaining to the time period starting July 1, 2022 through June 30, 2023. 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
- Cyber Security
- 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
October 27, 2023



Mount Sinai School District

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

June 2023

Table of Contents

| | |
|---|----------|
| Risk Assessment Overview | 2 |
| Internal Audit Objectives | 2 |
| Scope and Methodology | 3 |
| Internal Audit Risk Assessment Update Summary | 4 |
| Risk Rating and Internal Audit Plan | 5 |
| Risk Assessment Observations and Recommendations | 8 |
| Exhibits | 9 |

Mount Sinai School District
Annual Risk Assessment
June 2023

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.

Mount Sinai School District
Annual Risk Assessment
June 2023

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 June 2023 and were carried out in order to determine an internal audit plan for fiscal year 2023/2024 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 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.

Mount Sinai School District
Annual Risk Assessment
June 2023

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 initial risk assessment 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.

| <u>CURRENT YEAR RATINGS</u> | | <u>CHANGE FROM PRIOR YEAR</u> | |
|------------------------------------|-------------------------|--------------------------------------|---------------------|
| <u>Rating</u> | <u>2022/2023</u> | <u>Category (*)</u> | <u>Count</u> |
| High | - 0.09% | “High” to “Low” | - 0.00% |
| Moderate | 24 26.09% | “High” to “Moderate” | 1 14.29% |
| Low | 67 72.82% | “Moderate” to “Low” | 4 57.14% |
| N/A | 1 1.09% | “Low” to “Moderate” | 2 28.57% |
| Total | 92 100.00% | “Moderate” to “High” | - 0.00% |
| | | Total | 7 100.00% |

Our June 2023 risk assessment update contains no current year recommendations.

The District has completed or taken action on the five (5) prior risk assessment report recommendations as follows:

| | <u>Complete</u> | <u>In-Process</u> | <u>Not Started</u> | <u>Total</u> |
|------------------------|------------------------|--------------------------|---------------------------|---------------------|
| Recommendations | 5 | - | - | 5 |

We have summarized below areas we recommend the District consider for the selection of one (1) intensive cycle analyses to be performed during the fiscal year 2023/2024:

| <u>Cycle Reviews:</u> | <u>Other 2023/2024 Planned Internal Audit Services:</u> | |
|------------------------------|--|--|
| Safety & Security | • Information System Cycle Recommendations Follow-Up | • Annual Risk Assessment Update as of June 2024 |
| | • External Audit Corrective Action Plan Monitoring | • Other Internal Audit Services at the Request of the District/BOE |

Mount Sinai School District
Annual Risk Assessment
June 2023

Risk Rating and Internal Audit Plan

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

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

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

Mount Sinai School District
Annual Risk Assessment
June 2023

Risk Rating and Internal Audit Plan (Continued)

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

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

| | Business Process | Business Process Categories | RISK | | | YEAR OF SERVICE | | |
|----|-------------------------------------|---|----------|---------|-------|-----------------|-------|------------|
| | | | Inherent | Control | | Prior | 23-24 | Subsequent |
| | | | | 21-22 | 22-23 | | | |
| 8 | Benefits | 34 Eligibility | H | L | L | | | X |
| | | 35 Benefit Calculations | H | L | L | | | X |
| | | 36 Patient Protection & Affordable Care Act | H | L | L | | | X |
| | | 37 Retiree Benefits | H | L | L | | | X |
| | | 38 ERS/TRS | H | L | L | | | X |
| 9 | Purchasing and Related Expenditures | 39 PO System & Vendor Database | H | M | M | | | X |
| | | 40 Purchasing Process | H | M | M | | | X |
| | | 41 Payment Processing | H | M | M | | | X |
| | | 42 Employee Reimbursements | H | L | L | | | X |
| | | 43 Credit Cards | H | L | L | | | X |
| 10 | Facilities Maintenance | 44 Facilities Maintenance/Work Orders | H | M | M | | | X |
| | | 45 Staff Supervision | M | L | L | | | X |
| | | 46 Preventive Maintenance | M | M | M | | | X |
| | | 47 Coordination with Outside Vendors | M | L | L | | | X |
| 11 | Capital Projects | 48 Construction Planning & Monitoring | M | L | L | | | X |
| | | 49 Capital Project Funding & Payments | M | L | L | | | X |
| | | 50 Recordkeeping & Reporting | M | M | M | | | X |
| 12 | Fixed Assets | 51 Inventory/ Capitalization Policy | H | L | L | | | X |
| | | 52 Acquisition and Disposal | H | M | M | | | X |
| | | 53 Inventory Process & Recordkeeping | H | M | M | | | X |
| 13 | Food Service | 54 Sales Cycle and System | M | L | L | | | X |
| | | 55 Inventory and Purchasing | M | L | L | | | X |
| | | 56 Free & Reduced Meals | M | L | L | | | X |
| | | 57 Federal and State Reimbursement | H | L | L | | | X |
| | | 58 Financial Reporting & Monitoring | H | L | L | | | X |
| 14 | Extraclassroom Activity Fund | 59 General Controls | H | M | M | | | X |
| | | 60 Revenue | H | M | M | | | X |
| | | 61 Expenditures | M | M | M | | | X |
| | | 62 Reporting | M | M | M | | | X |

Mount Sinai School District
Annual Risk Assessment
June 2023

Risk Rating and Internal Audit Plan (Continued)

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

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

| | Business Process | Business Process Categories | Inherent | RISK | | YEAR OF SERVICE | | |
|----|-----------------------------|--------------------------------------|----------|-------|-------|-----------------|-------|------------|
| | | | | 21-22 | 22-23 | Prior | 23-24 | Subsequent |
| 15 | Information System | 63 Governance | H | L | M | ★ | | |
| | | 64 Inventory | H | L | L | ★ | | |
| | | 65 Network Security | H | L | L | ★ | | |
| | | 66 Application Security | H | L | M | ★ | | |
| | | 67 Physical Security | H | L | L | ★ | | |
| | | 68 Disaster Recovery | H | H | M | ★ | | |
| 16 | Cybersecurity | 69 General Controls | H | M | M | | | X |
| | | 70 Information & Asset Security | H | M | M | | | X |
| | | 71 Vulnerability Assessment | H | M | M | | | X |
| | | 72 Incident Response & Recovery | H | M | M | | | X |
| 17 | Student Data Management | 73 Registration & Enrolment | H | L | L | | | X |
| | | 74 Student Attendance | H | L | L | | | X |
| | | 75 Student Performance | H | M | M | | | X |
| | | 76 Student Eligibility | H | L | L | | | X |
| 18 | Pupil Personnel Services | 77 Budgeting and Planning | H | L | L | | | X |
| | | 78 STAC Reimbursement | H | M | M | | | X |
| | | 79 Medicaid Reimbursement | H | L | L | | | X |
| | | 80 RFP and Contracts | H | L | L | | | X |
| 19 | Transportation | 81 Fleet Inventory and Maintenance | H | N/A | N/A | | | X |
| | | 82 Bus Routing and Planning | H | L | L | | | X |
| | | 83 Labor and Supervision | H | M | L | | | X |
| | | 84 Contract Management | H | L | L | | | X |
| | | 85 Federal and State Reimbursement | H | L | L | | | X |
| 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 | |
| 21 | Insurance / Risk Management | 90 General | H | L | L | | | X |
| | | 91 Policy Management | H | L | L | | | X |
| | | 92 Claims Reporting | H | L | L | | | X |

Mount Sinai School District
Annual Risk Assessment
June 2023

Inherent Risk - Inherent risk pertains to the overall school district industry. Inherent risk is the risk of a material misstatement may occur assuming the absence of internal controls.

Control Risk - Control risk pertains specifically to the Mount Sinai 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

Status of Prior Year Recommendations

We have performed follow-up internal audit services applicable to our previously issued risk assessment update report dated December 2022. The services we performed included observing and evaluating the implementation status of the District's action plan in respect to our prior risk assessment recommendations. The December 2022 risk assessment update identified five (5) recommendations within four (4) distinct areas. The District has completed or taken action on the five (5) recommendations as follows:

| <u>Business Process</u> | <u>Complete</u> | <u>In-Process</u> | <u>Not Started</u> | <u>Total</u> |
|--------------------------------|------------------------|--------------------------|---------------------------|---------------------|
| Budget Development | 1 | - | - | 1 |
| Revenue & Cash Management | 2 | - | - | 2 |
| Information Systems | 1 | - | - | 1 |
| Transportation | 1 | - | - | 1 |
| Total | 5 | - | - | 5 |

Budget Development

1. We noted that the Board of Education minutes do not evidence their review of Budget Status Reports in accordance with the Section 170.2 (p) of the Regulations of the Commissioner of Education.

➤ *We recommend that the Board of Education document their review of the periodic Budget Status Reports in the minutes to ensure compliance with Section 170.2(p) of the Regulations of the Commissioner of Education.*

Status at June 2023: Complete.

Revenue and Cash Management

2. We noted that the District does not reconcile cash receipts recorded in the cash log to nVision cash receipt entries. In addition, we noted cash receipts were not deposited in a timely manner. Deposits were made over seven (7) days after the funds were received at the Business Office and recorded in the cash log.

➤ *We recommend that the District develop a procedure to have an employee outside of the cash receipt process reconcile the cash log to the nVision cash receipt entries to ensure all have been posted. In addition, we recommend that the District deposit cash and checks within one (1) week of receipt to strengthen the safeguarding of District funds.*

Status at June 2023: Complete.

Mount Sinai School District
Annual Risk Assessment
June 2023

3. We noted that the Board of Education minutes do not evidence the Board's receipt or review of the monthly Treasurer's Reports.
 - *We recommend that Board of Education document their review of the Treasurer's Reports in the meeting minutes as evidence of their review and approval.*

Status at June 2023: Complete.

| |
|---------------------|
| Information Systems |
|---------------------|

4. We noted that the District does not have a current Disaster Recovery Plan in place. The Disaster Recovery Plan was created in 2010 and does not address specific programs, back up procedures, or testing requirements. It was represented to us that the Director of Information Technology is in the process of creating the Disaster Recovery Plan.
 - *We recommend that the District update the Disaster Recovery Plan and submit the Plan for Board of Education approval as soon as possible to ensure the District's data is adequately secured and recoverable in case of a breach or loss of data.*

Status at June 2023: Complete.

| |
|----------------|
| Transportation |
|----------------|

5. The New York State Department of Motor Vehicles qualifies bus drivers to operate school buses by awarding them "19-A status," as required by New York State Vehicle and Traffic Law. We noted that the District does not request proof of 19-A status from the busing vendor for driver's servicing the District's routes.
 - *We recommend that the District obtain proof of 19-A status for all drivers who will be servicing District routes. In addition, we recommend that the District perform a periodic inspection of driver records to ensure additional required documentation, such as road tests and medical examinations, are performed.*

Status at June 2023: Complete.

EXHIBITS

Exhibit I History of Internal Audit Reports Issued

Exhibit II Internal Audit Plan for 2023/2024

Mount Sinai Union Free School District
Internal Audit - Nawrocki Smith
History of Internal Audit Reports Issued
As of June 2023

| <u>Report Type</u> | <u>22/23</u> |
|--------------------|--------------|
|--------------------|--------------|

Cycles:

| | |
|-----------------------------------|---|
| Accounting & Reporting | - |
| Benefits | - |
| Budget Development | - |
| Capital Projects | - |
| Cybersecurity | - |
| Extraclassroom Activity Funds | - |
| Facilities Maintenance | - |
| Fixed Assets | - |
| Food Service | - |
| Governance & Planning | - |
| Grants | - |
| Human Resources | - |
| Information Systems | X |
| Insurance/Risk Management | - |
| Payroll | - |
| Pupil Personnel Services | - |
| Purchasing & Related Expenditures | - |
| Revenue & Cash Management | - |
| Safety & Security | - |
| Student Data Management | - |
| Transportation | - |

Other Internal Audit Services:

| | |
|------------------------------|---|
| Corrective Action Monitoring | X |
| Risk Assessment | X |

Mount Sinai School District

Nawrocki Smith - Internal Audit

2023/2024 INTERNAL AUDIT PLAN

Cycle Review

- Safety & Security

Status

Planned for Jan-24

Additional Internal Audit Services

- Issue Quarterly Status Reports
- Annual Risk Assessment Update as of June 2024
- Other Internal Audit Services at the Request of the District

Status

**Quarterly
Planned for Jun-24
As Requested**

Proposed On-Site Internal Audit Schedule

TBD