

WILSON SCHOOL DISTRICT
BERKS COUNTY, PENNSYLVANIA
PERFORMANCE AUDIT REPORT

AUGUST 2011

The Honorable Tom Corbett
Governor
Commonwealth of Pennsylvania
Harrisburg, Pennsylvania 17120

Mr. Al Wicks, Board President
Wilson School District
2601 Grandview Boulevard
West Lawn, Pennsylvania 19609

Dear Governor Corbett and Mr. Wicks:

We conducted a performance audit of the Wilson School District (WSD) to determine its compliance with applicable state laws, regulations, contracts, grant requirements, and administrative procedures. Our audit covered the period May 25, 2007 through July 14, 2010, except as otherwise indicated in the report. Additionally, compliance specific to state subsidy and reimbursements was determined for the school years ended June 30, 2008 and June 30, 2007. Our audit was conducted pursuant to 72 P.S. § 403 and in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Our audit found that the WSD complied, in all significant respects, with applicable state laws, regulations, contracts, grant requirements, and administrative procedures, except as detailed in one finding noted in this report. In addition, we identified one matter unrelated to compliance that is reported as an observation. A summary of these results is presented in the Executive Summary section of the audit report.

It was disclosed through the District's letter of representation that an instance of fraud occurred in the business office. In July 2009, a former District employee was charged with mail fraud for defrauding the District of money by means of materially false pretenses and representation.

The case has been adjudicated. The individual pled guilty to mail fraud and violating the Stop Terrorist and Military Hoaxes Act of 2004. The individual was sentenced to 30 months in federal prison and ordered to pay restitution of \$92,130.

Our audit finding, observation and recommendations have been discussed with WSD's management and their responses are included in the audit report. We believe the implementation of our recommendations will improve WSD's operations and facilitate compliance with legal and administrative requirements. We appreciate the WSD's cooperation during the conduct of the audit and their willingness to implement our recommendations.

Sincerely,

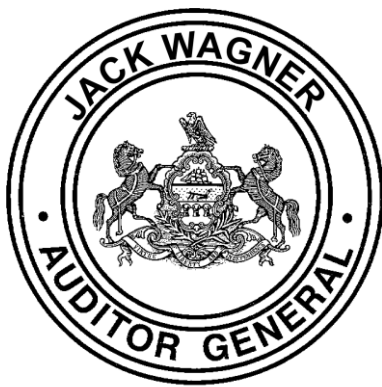
August 29, 2011

JACK WAGNER
Auditor General

cc: **WILSON SCHOOL DISTRICT** Board Members

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Executive Summary

Audit Work

The Pennsylvania Department of the Auditor General conducted a performance audit of the Wilson School District (WSD). Our audit sought to answer certain questions regarding the District's compliance with applicable state laws, regulations, contracts, grant requirements, and administrative procedures; and to determine the status of corrective action taken by the WSD in response to our prior audit recommendations.

Our audit scope covered the period May 25, 2007 through July 14, 2010, except as otherwise indicated in the audit scope, objectives, and methodology section of the report. Compliance specific to state subsidy and reimbursements was determined for school years 2007-08 and 2006-07.

District Background

The WSD encompasses approximately 39 square miles. According to 2000 federal census data, it serves a resident population of 38,778. According to District officials, in school year 2007-08 the WSD provided basic educational services to 5,724 pupils through the employment of 443 teachers, 626 full-time and part-time support personnel, and 30 administrators. Lastly, the WSD received more than \$13.3 million in state funding in school year 2007-08.

Audit Conclusion and Results

Our audit found that the WSD complied, in all significant respects, with applicable state laws, regulations, contracts, grant requirements, and administrative procedures; however, as noted below, we identified one compliance-related matter reported as a finding and one matter unrelated to compliance that is reported as an observation.

Finding: Possible Certification

Deficiencies. WSD continued to fail to accurately monitor the assignments for its professional personnel. Our audit of the professional employees' certification and assignments for the period September 1, 2008 through May 31, 2010, found three possible certification deficiencies. The WSD may be subject to a subsidy forfeiture of \$11,611 (see page 6).

Observation: Continued Unmonitored

Vendor System Access and Logical Control Weaknesses. We noted that WSD personnel continue to need to improve controls over remote access to its computers. In particular, controls should be strengthened over outside vendor access to the student accounting applications (see page 8).

Status of Prior Audit Findings and

Observations. With regard to the status of our prior audit recommendations to the WSD from an audit we conducted of the 2005-06, 2004-05, 2003-04 and 2002-03 school years, we found the WSD had taken appropriate corrective action in implementing our recommendations pertaining to pupil transportation, tuition

billing, school bus driver qualifications, Memorandum of Understanding and internal control weaknesses in administrative policies regarding bus drivers' qualifications. However, we found that the WSD did not take appropriate corrective action in implementing all recommendations related to certification deficiencies and their student accounting applications (see page 11).

Audit Scope, Objectives, and Methodology

Scope

What is a school performance audit?

School performance audits allow the Department of the Auditor General to determine whether state funds, including school subsidies, are being used according to the purposes and guidelines that govern the use of those funds. Additionally, our audits examine the appropriateness of certain administrative and operational practices at each Local Education Agency (LEA). The results of these audits are shared with LEA management, the Governor, the PA Department of Education, and other concerned entities.

Our audit, conducted under authority of 72 P.S. § 403, is not a substitute for the local annual audit required by the Public School Code of 1949, as amended. We conducted our audit in accordance with *Government Auditing Standards* issued by the Comptroller General of the United States.

Our audit covered the period May 25, 2007 through July 14, 2010.

Regarding state subsidy and reimbursements, our audit covered school years 2007-08 and 2006-07.

While all districts have the same school years, some have different fiscal years. Therefore, for the purposes of our audit work and to be consistent with Department of Education (DE) reporting guidelines, we use the term school year rather than fiscal year throughout this report. A school year covers the period July 1 to June 30.

Objectives

What is the difference between a finding and an observation?

Our performance audits may contain findings and/or observations related to our audit objectives. Findings describe noncompliance with a law, regulation, contract, grant requirement, or administrative procedure. Observations are reported when we believe corrective action should be taken to remedy a potential problem not rising to the level of noncompliance with specific criteria.

Performance audits draw conclusions based on an evaluation of sufficient, appropriate evidence. Evidence is measured against criteria, such as, laws, regulations, and defined business practices. Our audit focused on assessing the WSD's compliance with applicable state laws, regulations, contracts, grant requirements, and administrative procedures. However, as we conducted our audit procedures, we sought to determine answers to the following questions, which serve as our audit objectives:

- ✓ Were professional employees certified for the positions they held?
- ✓ In areas where the District receives state subsidy and reimbursements based on pupil membership (e.g. basic education, special education, and vocational education), did it follow applicable laws and procedures?
- ✓ Did the District use an outside vendor to maintain its membership data and if so, are there internal controls in place related to vendor access?

- ✓ Is the District’s pupil transportation department, including any contracted vendors, in compliance with applicable state laws and procedures?
- ✓ Are there any declining fund balances which may impose risk to the fiscal viability of the District?
- ✓ Did the District pursue a contract buyout with an administrator and if so, what was the total cost of the buy-out, reasons for the termination/settlement, and do the current employment contract(s) contain adequate termination provisions?
- ✓ Were there any other areas of concern reported by local auditors, citizens, or other interested parties which warrant further attention during our audit?
- ✓ Is the District taking appropriate steps to ensure school safety?
- ✓ Did the District take appropriate corrective action to address recommendations made in our prior audits?

Methodology

What are internal controls?

Internal controls are processes designed by management to provide reasonable assurance of achieving objectives in areas such as:

- Effectiveness and efficiency of operations;
- Relevance and reliability of operational and financial information;
- Compliance with applicable laws, regulations, contracts, grant requirements and administrative procedures.

Government Auditing Standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding, observation and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding, observation and conclusions based on our audit objectives.

WSD management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the District is in compliance with applicable laws, regulations, contracts, grant requirements, and administrative procedures. Within the context of our audit objectives, we obtained an understanding of internal controls and assessed whether those controls were properly designed and implemented.

Any significant deficiencies found during the audit are included in this report.

In order to properly plan our audit and to guide us in possible audit areas, we performed analytical procedures in the areas of state subsidies/reimbursement, pupil membership and pupil transportation.

Our audit examined the following:

- Records pertaining to pupil transportation, bus driver qualifications, professional employee certification, and financial stability.
- Items such as Board meeting minutes, pupil membership records, and reimbursement applications.
- Tuition receipts.

Additionally, we interviewed selected administrators and support personnel associated with WSD operations.

Lastly, to determine the status of our audit recommendations made in a prior audit report released on January 28, 2009, we reviewed the WSD's response to DE dated June 2, 2009. We then performed additional audit procedures targeting the previously reported matters.

Findings and Observations

Finding

Public School Code section relevant to the finding:

Section 1202 provides, in part:

No teacher shall teach, in any public school, any branch which he has not been properly certificated to teach.

Section 1212 provides, in part:

Every district superintendent shall keep an accurate record of all valid certificates held by the teachers of the schools within his jurisdiction.

Section 2518 mandates any school district that:

. . . has in its employ any person in a position that is subject to the certification requirements of the Department of Education but who has not been certificated for his position by the Department of Education . . . shall forfeit an amount equal to six thousand dollars (\$6,000) less the product of six thousand dollars (\$6,000) and the district's market value/income aid ratio. . . .

Possible Certification Deficiencies

Our audit of the District's professional employees' certification and assignments for the period September 1, 2008 through May 31, 2010, found three possible certification deficiencies as follows:

- A home and school visitor may have served without proper certification from November 2008 through present. The individual has applied for emergency certification which was pending as of our fieldwork completion date.
- A reading specialist may have served without proper certification from September 2009 through May 2010. The individual was issued a reading specialist, Instructional I certificate in June 2010.
- An ROTC instructor may have served without proper certification from September 2009 through February 2010. The individual has applied for emergency certification for the 2009-10 school year, which was not approved until March 2010.

Information pertaining to the possible certification deficiencies was submitted to the Bureau of School Leadership and Teacher Quality (BSLTQ), Department of Education, for its review. If BSLTQ confirms the deficiencies, the District would be subject to a subsidy forfeiture of \$2,899 for the 2008-09 school year and \$8,712 for the 2009-10 school year.

The possible certification deficiencies were caused by the administration's failure to accurately monitor assignments for its professional personnel.

Recommendations

The *Wilson School District* should:

1. Assign positions to professional personnel who hold appropriate certification to qualify for the assignment.

2. Implement a system of control that would evidence lapsed or invalid certificates.

The Department of Education should:

3. In conjunction with BSLTQ's determination, adjust the District's allocations to recover any subsidy forfeitures deemed necessary.

Management Response

Management stated the following:

For the Audit Period June 30, 2007 and 2008 and citing Current Certification Irregularities, the Wilson School District does not dispute the facts relating to the certificates for [the three individuals.] We do, however, believe there are some extenuating circumstances involved with two of the three certification issues.

The District has been waiting for [one individual] (LTS Home & School Visitor) to submit her transcripts from Kutztown University to PDE in order for PDE to issue an Emergency Permit for her work at Wilson. To date, that information has not been received by PDE and [the individual's] final day with the District was June 16, 2010.

[The second individual] commenced employment as a Reading Specialist with Wilson School District on August 25, 2009. This individual had worked as a Reading Specialist in the state of New York and started the process to obtain a PA Reading Specialist certificate prior to her appointment with Wilson (PDE received her application on July 9, 2009). [The individual] and [management] had numerous conversations with PDE Certification Staff regarding the length of time for this certification process (including duplicate information needing to be sent to PDE) and [the individual] was finally granted her Pennsylvania certificate on June 1, 2010.

[The third individual], Wilson's JROTC Instructor, applied for a re-issuance of an Emergency Permit for the 2009-2010 school year. This re-issuance was received by PDE on September 28, 2009 (and anticipated it would be effective September 1, 2009) however [this individual] was not issued the Emergency Permit until March 1, 2010.

Observation

What is logical access control?

“Logical access” is the ability to access computers and data via remote outside connections.

“Logical access control” refers to internal control procedures used for identification, authorization, and authentication to access the computer systems.

Continued Unmonitored Vendor System Access and Logical Access Control Weaknesses

The Wilson School District continues to use software purchased from an outside vendor for its critical student accounting applications (membership and attendance). Additionally, the District’s entire computer system, including all its data and the above software are maintained on the Berks County Intermediate Unit #14’s (BCIU) servers which are physically located at the BCIU. The District has remote access into the BCIU’s network servers, with the BCIU providing system maintenance and support.

Based on our current year procedures, we determined that a risk exists that unauthorized changes to the District’s data could occur and not be detected because the District was unable to provide supporting evidence that it is adequately monitoring all vendor activity in its system. However, since the District has adequate manual compensating controls in place to verify the integrity of the membership and attendance information in its database, that risk is mitigated.

Reliance on manual compensating controls becomes increasingly problematic if the District would ever experience personnel and/or procedure changes that could reduce the effectiveness of the manual controls. Unmonitored vendor system access and logical access control weaknesses could lead to unauthorized changes to the District’s membership information and result in the District not receiving the funds to which it was entitled from the state.

During our review, we found the District had the following weaknesses over vendor access to the District’s system:

1. The vendor has unlimited access (24 hours a day/7 days a week) into the District’s system.
2. The District’s Acceptable Use Policy does not include provisions for authentication (password security and syntax requirements).

3. The District has certain weaknesses in logical access controls. We noted that the District's system parameter settings do not require all users, including the vendor, to change their passwords every 30 days; to use passwords that are a minimum length of eight characters; and to maintain a password history (i.e., approximately ten passwords).

Recommendations

The *Wilson School District* should:

1. Only allow access to their system when the vendor needs access to make pre-approved changes/updates or requested assistance. This access should be removed when the vendor has completed its work. This procedure would also enable the monitoring of vendor changes.
2. Ensure that the District's Acceptable Use Policy includes provisions for authentication (password security and syntax requirements).
3. Implement a security policy and system parameter settings to require all users, including the vendor, to change their passwords on a regular basis (i.e., every 30 days). Passwords should be a minimum length of eight characters. Also, the District should maintain a password history that will prevent the use of a repetitive password (i.e., last ten passwords).

Management Response

Management stated the following:

Our student information system is housed and supported by the Berks County Intermediate Unit (BCIU). BCIU access is required as part of the Service Level Agreement to support the consortium and BCIU hardware assets. We cannot make changes to how the system is accessed under the current Service Level Agreement.

We will be changing our security requirements in August of 2010 for the start of the new school year. At that time, the authentication requirements will be added to our AUP and submitted for board approval.

As stated above, the BCIU hosts our Student Information System. They set security policies for the system which is shared between all consortium members. We must follow the security authentication requirements that the BCIU has set for the system.

Auditor Conclusion

The conditions and recommendations stated above represent the information communicated to the auditors during our fieldwork. Any subsequent improvements or changes in management representations will be evaluated in the subsequent audit.

Status of Prior Audit Findings and Observations

Our prior audit of the Wilson School District (WSD) for the school years 2005-06, 2004-05, 2003-04 and 2002-03 resulted in six reported findings and one reported observation. As shown in the following table, as part of our current audit, we determined the status of corrective action taken by the District to implement our prior recommendations. We analyzed the WSD Board's written response provided to the Department of Education (DE), performed audit procedures, and questioned District personnel regarding the prior findings and observation. As shown below, we found that the WSD did implement recommendations related to pupil transportation, tuition billing, bus driver qualifications, Memorandum of Understanding and internal control weaknesses in administrative policies regarding bus drivers' qualifications. However, we found that the WSD did not implement all recommendations related to certification deficiencies and their student accounting applications.

<i>School Years 2005-06, 2004-05, 2003-04 and 2002-03 Auditor General Performance Audit Report</i>		
<i>Prior Recommendations</i>	<i>Implementation Status</i>	
<p><u><i>I. Finding No. 1: Pupil Transportation Reporting Errors Resulted in a \$79,201 Reimbursement Underpayment</i></u></p> <ol style="list-style-type: none"> 1. Establish procedures, based on DE guidelines, to ensure accurate reporting of all data elements used in the calculation of transportation reimbursement. 2. DE should adjust the District's allocations to correct the \$79,201 reimbursement underpayment. 	<p>Background:</p> <p>Our prior audit of the District's transportation records for the four year audit period found errors in the 2005-06 school year. Errors occurred in data submitted to DE for daily mileage, total mileage, the number of days transportation was provided, and the number of pupils transported. The errors resulted in a \$79,201 underpayment of transportation reimbursement.</p>	<p>Current Status:</p> <p>We followed up on the WSD's pupil transportation reporting errors and found that WSD did take appropriate corrective action.</p> <p>Procedures ensuring accurate reporting of all data elements used for transportation reimbursement have been established.</p> <p>DE adjusted the District's allocations on April 29, 2010 to correct the \$79,201 reimbursement underpayment.</p>

<p><u>II. Finding No. 2: Tuition Billing Errors Resulted in a \$40,968 Net Underbilling by the District, and a \$1,042 Overpayment by the District</u></p> <ol style="list-style-type: none"> 1. Establish procedures to reconcile tuition billing data with membership records. 2. Send revised tuition bills to Beaver Area, Exeter Township, Fleetwood Area, Harrisburg City, Muhlenburg, Reading, and Schuylkill Valley school districts to collect the amounts due. 3. Refund Antietam, Conrad Weiser Area, Governor Mifflin, Tulpehocken Area, and Wyomissing Area school districts for the overbilled tuition. 4. Obtain membership reports from the Berks County Technology Center (BCTC) which identify all WSD students enrolled at the BCTC and reconcile with district membership records and tuition bills to ensure that membership days and amounts billed are correct. 5. Request that Career and Technology Center of Lackawanna County (CTCLC) refund the District \$1,042. 6. Review tuition bills and membership data for subsequent years, and if similar errors are found, submit revised billings and/or membership data to the affected districts and/or DE. 	<p>Background:</p> <p>Our prior audit of tuition bills and nonresident and resident membership data for special and regular education students found errors in tuition billed and membership days reported to DE for services provided by WSD during the 2005-06, 2004-05, 2003-04 and 2002-03 school years. These errors resulted in \$40,968 net underbilling by the District. In addition, WSD overpaid the CTCLC \$1,042 for a WSD student who was educated at CTCLC.</p>	<p>Current Status:</p> <p>We followed up on the tuition billing errors and found that the WSD did take appropriate corrective action.</p> <p>Procedures to reconcile tuition billing data with membership records have been established.</p> <p>Revised tuition bills have been sent to the Districts in which amounts were due.</p> <p>Refunds were invoiced to the Districts that were overbilled tuition costs.</p> <p>Membership reports from BCTC identifying WSD students enrolled were obtained and reconciled with District membership records, ensuring membership days and amounts billed are correct.</p> <p>A refund to CTCLC has been requested in the amount of \$1,042.</p> <p>Tuition bills and membership data for subsequent years has been reviewed, noting no similar errors.</p>
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<p><u>III. Finding No. 3:</u> <u>Certification Deficiencies</u></p> <ol style="list-style-type: none"> 1. Take the necessary actions, based on the Bureau of School Leadership and Teacher Quality final determination, to ensure the individuals cited comply with certification regulations. 2. Require all professional employees to have valid Pennsylvania certification prior to employment. 3. DE should recover the subsidy forfeitures of \$21,420. 	<p>Background:</p> <p>Our prior audit of professional employees' certification and assignments for the period August 1, 2003 through April 25, 2007 found three deficiencies. Therefore, the District was subject to subsidy forfeitures of \$8,733, \$4,735, \$3,980 and \$3,972 for the 2006-07, 2005-06, 2004-05 and 2003-04 school years, respectively, totaling \$21,420.</p>	<p>Current Status:</p> <p>We followed up on the certification deficiencies and found that WSD did not comply with all of our recommendations as noted in the certification finding in this report.</p> <p>Individuals cited complied by providing appropriate certification.</p> <p>All professional employees do not have valid Pennsylvania certification.</p> <p>On June 1, 2009, DE recovered the revised subsidy forfeitures of \$20,981 (see the Finding on page 6).</p>
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<p><u>IV. Finding No. 4: School Bus Driver Qualifications Deficiencies</u></p> <ol style="list-style-type: none"> 1. Ensure that the District's transportation coordinator reviews each driver's qualifications prior to that person transporting students. 2. Maintain files, for all District drivers and work with the transportation contractors as necessary to ensure that the District's files are up-to-date and complete. 	<p>Background:</p> <p>Our prior audit of personnel records for the District's bus drivers found that one individual did not possess the report of criminal history record information required by the Public School Code. As a result of the audit, the District did subsequently obtain the criminal record check, which indicated the individual had no criminal record.</p>	<p>Current Status:</p> <p>We followed up on the driver qualifications and found that WSD did take appropriate corrective action.</p> <p>The District's transportation coordinator reviews each driver's qualifications prior to transporting students.</p> <p>Files for all District drivers and work with the transportation contractors are maintained, up-to-date and complete.</p>
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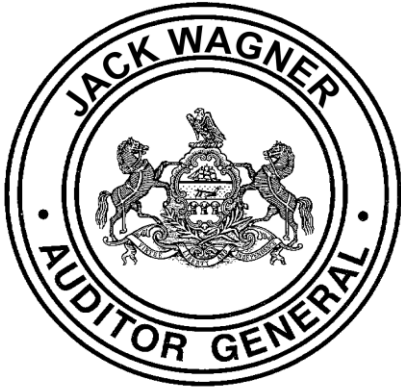
<p><u>V. Finding No. 5:</u> <u>Memorandum of Understanding Not Updated Timely</u></p> <p>1. The school board and District administrators in consultation with the District’s solicitor should review and update the current Memorandum of Understanding (MOU) between itself and its local law enforcement agencies.</p>	<p>Background:</p> <p>Our prior audit of the District’s records found that the District had on file a properly signed MOU between itself and its local law enforcement agencies. However, the MOU has not been updated since July 30, 2002.</p>	<p>Current Status:</p> <p>We followed up on the MOU and found that WSD did take appropriate corrective action.</p> <p>The MOU between the District and law enforcement agencies has been signed and updated. The most current MOU is dated May 22, 2009.</p>
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<p><u>VI. Finding No. 6:</u> <u>Unmonitored Vendor System Access and Logical Access Control Weaknesses</u></p> <p>1. Generate monitoring reports (including firewall logs) of the vendor and employee remote access and activity on their system. Monitoring reports should include the date, time, and reason for access, change(s) made and who made the change(s). The District should review these reports to determine that the access was appropriate and that data was not improperly altered. The District should also ensure it is maintaining evidence to support this monitoring and review.</p> <p>2. Maintain evidence that it performs reconciliations between system generated membership and attendance reports and manually kept membership and attendance records to</p>	<p>Background:</p> <p>Our prior audit found that the WSD uses software purchased from an outside vendor for its critical student accounting applications (membership and attendance). Additionally, the WSD’s entire computer system, including all its data and the above vendor’s software are maintained on Berks County Intermediate Unit #14’s (BCIU) servers which are physically located at BCIU. The District has remote access into BCIU’s network servers. BCIU also provides the District with system maintenance and support.</p>	<p>Current Status:</p> <p>We followed up on WSD’s student accounting applications controls and access and found that WSD did not take appropriate corrective action in all recommended areas as noted in the observation in this report.</p> <p>Monitoring reports (including firewall logs) of the vendor and employee remote access and activity on their system have been generated. In addition, the District ensures it is maintaining evidence to support this monitoring and review.</p> <p>The District performs and maintains evidence of reconciliations between system generated membership and attendance reports and manually kept membership and attendance records to ensure that any unauthorized changes within the system would be detected in a timely manner.</p> <p>The vendor still has unlimited access into the District’s</p>
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<p>ensure that any unauthorized changes within the system would be detected in a timely manner.</p> <p>3. Only allow remote access to their system when the vendor needs access to make pre approved changes/updates or requested assistance. This access should be removed when the vendor has completed its work. This procedure would also enable the monitoring of vendor changes.</p> <p>4. The contract with the vendor should contain a non-disclosure agreement for the District's proprietary information.</p> <p>5. Maintain documentation to evidence that terminated employees are properly removed from the system in a timely manner.</p> <p>6. Develop policies and procedures to require written authorization when adding, deleting, or changing a userID.</p> <p>7. The upgrades/updates to the District's system should be made only after receipt of written authorization from appropriate District officials.</p> <p>8. Develop policies and procedures to analyze the impact of proposed program changes before implementing the changes.</p>		<p>system.</p> <p>A non-disclosure agreement for the District's proprietary information has been incorporated into the contract with the vendor.</p> <p>Terminated employees are properly removed from the system in a timely manner. Documentation of the removal is maintained.</p> <p>Policies and procedures have been established to require written authorization when adding, deleting, or changing a userID.</p> <p>Only after receipt of written authorization from appropriate District officials are upgrades/updates made to the District's system.</p> <p>Policies and procedures have been developed to analyze the impact of proposed program changes before implementation of the changes.</p> <p>Separate information technology (IT) policies and procedures have been established for controlling the activities of the vendors/consultants. Signature of agreement, by the vendor, to the policies and procedures is required.</p> <p>The District's Acceptable Use Policy does not include provisions for authentication (password security and syntax requirements).</p> <p>Implementation of a security policy and system parameter settings has been established by the District. However, not all recommended settings are required. The District still</p>
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<p>9. Establish separate IT policies and procedures for controlling the activities of vendors/consultants and have the vendor sign this policy, or the District should require the vendor to sign the District's Acceptable Use Policy.</p> <p>10. The District's Acceptable Use Policy should include provisions for authentication (e.g., password security and syntax requirements).</p> <p>11. Implement a security policy and system parameter settings to require all users, including the vendor, to change their passwords on a regular basis (i.e., every 30 days). Passwords should be a minimum length of eight characters and include alpha, numeric, and special characters. Also, the District should maintain a password history that will prevent the use of a repetitive password (i.e., last ten passwords), lock out users after three unsuccessful attempts and log users off the system after a period of inactivity (i.e., 60 minutes maximum).</p>		<p>has weaknesses in changing their passwords every 30 days, using passwords that are a minimum length of eight characters and maintaining a password history (approximately ten passwords).</p>
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<p><u>VII. Observation: Internal Control Weaknesses in Administrative Policies Regarding Bus Drivers' Qualifications</u></p> <ol style="list-style-type: none"> 1. Develop a process to determine on a case-by-case basis, whether prospective and current employees of the District and/or the District's transportation contractors have been charged with or convicted of crimes that, even though not disqualifying under state law, affect their suitability to have direct contact with children. 2. Implement written policies and procedures to ensure that the District is notified when current employees of the District and the District's transportation contractors drivers are charged with or convicted of crimes that call into question their suitability to continue to have direct contact with children and to ensure that the District considers on a case-by-case basis whether any conviction of a current employee should lead to an employment action. 	<p>Background:</p> <p>Our prior audit of the District policies found that neither the District nor one of its two current transportation contractors have written policies or procedures in place to ensure that they are notified if current employees have been charged with or convicted of serious criminal offenses which should be considered for the purpose of determining an individual's continued suitability to be in direct contact with children.</p>	<p>Current Status:</p> <p>We followed up on the district's control weaknesses regarding driver qualifications and found that WSD did take appropriate corrective action.</p> <p>A process to determine on a case-by-case basis whether prospective and current employees of the District and/or the District's transportation contractors have been charged with or convicted of crimes, that even though not disqualifying under state law, affect their suitability to have direct contact with children has been developed.</p> <p>Written policies and procedures to ensure that the District is notified when current employees of the District and the District's transportation contractors drivers are charged with or convicted of crimes that call into question their suitability to continue to have direct contact with children and to ensure that the District considers on a case-by-case basis whether any conviction of a current employee should lead to an employment action have been implemented.</p>
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Distribution List

This report was initially distributed to the superintendent of the school district, the board members, our website address at www.auditorgen.state.pa.us, and the following:

The Honorable Tom Corbett
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Commonwealth of Pennsylvania
Harrisburg, PA 17120

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