



***Risk Assessment FY 2015/2016
& Recommended Audit Plan
March 2016***

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April 6, 2016

Ms. Marjorie Schiff
President of the Board of Education
Katonah-Lewisboro Union Free School District
P.O. Box 387
Katonah, NY 10536

Dear Ms. Schiff:

We have recently completed our risk assessment update for the Katonah-Lewisboro Union Free School District (the "District") on behalf of the Board of Education and Audit Committee. Our risk assessment of District operations identified and prioritized risks in accordance with New York's Chapter 263 of the Laws of 2005.

In our risk assessment update, we re-evaluated the major functional areas of District operations to determine if there were any significant changes that would impact the risk evaluation from the previous fiscal year. Based upon the results of this current fiscal year risk assessment, we have updated our proposed risk-based audit plan that is attached to this report for your review and consideration. Our risk assessment update and corresponding recommended audit plan identifies the following areas as candidates for audit:

- Human Resources and Payroll

A summary for each functional area reviewed and related risk rating is in the attached risk assessment update report. We met with the Audit Committee to discuss this report and the recommended internal audit plan on April 5, 2016. We are available to meet with the Board at its convenience.

We appreciate the cooperation and assistance provided by District staff.

Very truly yours,

A handwritten signature in blue ink that reads "Accume Partners". The signature is written in a cursive, flowing style.

Accume Partners

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Accume Partners Risk Assessment Approach

We have performed an audit risk assessment update for the Katonah-Lewisboro Union Free School District (“District”), on behalf of the District Audit Committee and Board of Trustees in accordance with New York’s Chapter 263 of the Laws of 2005. A risk assessment is a systematic process for identifying and controlling risk. Risk can be defined as the possibility that something could negatively affect the District. More specifically, risk can be defined as the internal and external factors that threaten the achievement of the District’s mission, goals, and objectives.

As the District’s Internal Auditor, our primary responsibility is two-fold. First, internal audit’s role is to assist the Board in ensuring that the District’s risks are identified. Second, Internal Audit provides the Board and Management with a systematic assessment of risk to ensure that appropriate internal controls are in place to mitigate those risks.

The recommended internal audit plan is derived from the risk assessment. The internal audit plan summarizes the recommended audits or “test of controls” the District should conduct to evaluate its risk management strategies. Effective and efficient internal controls, or risk management strategies, gives the Board and Management greater assurance that the District can achieve its mission, goals and objectives. The operational effectiveness of internal controls is then tested during the internal audit.

Our risk assessment includes a District-wide analysis of the major District functions, processes, and controls. We consider qualitative and quantitative factors such as materiality to the financial statements, policies and procedures, strategic planning, and organizational change. Also, the risk assessment includes a quantitative risk rating that represents an aggregate assessment of risk relative to the financial and operating environment, information technology, governance, internal controls and compliance factors.

In the initial risk assessment, our overall goal was to determine the degree of risk within the major functional areas of District operations. This resulted in our designing an annual audit plan to focus on those areas which were most at risk. In our risk assessment update, we re-evaluated the same functional areas to determine if there were any significant changes that would impact the risk evaluation.

Internal Audit does not strictly recommend auditing only the functional areas with the highest risk rating score. Other factors affecting the recommendation include Board/Management priorities, limited resources, prior audit results, the opportunity for a greater impact in adding value to the organization, and the degree of organizational change in the functional area. All of these factors are addressed when devising the recommended audit plan.

Risk Rating Methodology

In performing our risk assessment we categorized the District into nine functional areas. We then utilized a rating methodology that takes into account sixteen quantitative and qualitative factors such as: policies and procedures; financial materiality; operational change; employee knowledge & training; internal controls; management reporting; and laws and regulations. The sixteen factors were individually weighted by relevance and importance. Then, a risk matrix was developed to comprise the sixteen factors across all nine functional areas.

The risk matrix is used to provide a systematic evaluation of risk. Each functional area's composite risk rating score is derived from the sum of the individual ratings scores of the sixteen factors. The rating system represents an aggregate assessment of risk, with the level of risk determined by the composite risk score as defined in the table below:

Composite Risk Rating Score and Level

Low < 131	Medium 131 – 210	High 211 – 300
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The qualitative and quantitative factors are individually weighted for relevance and significance. Thus, some factors will affect the overall risk rating more than others. In other words, the financial significance, materiality or criticality of a particular function to the organization's operations can increase the risk rating of a function. For example, in Payroll and Purchasing, the risk rating score for most Districts will be relatively higher than other areas because of the financial significance or materiality of these operations. This explains that some areas within the District may have higher inherent risks associated with them relative to other operations.

Another factor that can increase the risk rating is the design of internal controls. Although our risk assessment does not test and evaluate the operational effectiveness of internal controls, our methodology includes the identification of internal controls, as well as an evaluation of the design of internal controls. If the District was lacking in a key control over a functional area such as adequate segregation of duties or policies and procedures, that would create more risk.

In addition, we review for a system of internal controls that both prevent and detect errors. Preventative internal controls are controls that may prevent errors from occurring, whereas detective controls are controls that may detect errors once they have occurred. If the District has more controls in place that prevent errors, then the overall control environment would be stronger, and hence there would be less risk, than if the District relied solely on detective controls. The ultimate goal is to effectively manage the risks in all functional areas through the implementation of a system of internal controls that help to ensure that errors, irregularities, and fraud are less likely to occur or go undetected.



Executive Summary

Functional Area	FY15/16		FY14/15		Internal Audit Conducted
	Risk Rating	Level	Risk Rating	Level	
Budget, Financial Accounting & Reporting	168	Medium	179	Medium	May, 2008 Sept, 2013
Debt, Investments & Cash	125	Low	125	Low	
Revenues & Accounts Receivable	129	Low	139	Medium	
Purchasing & Accounts Payable	146	Medium	155	Medium	Aug, 2010 Aug, 2014
Human Resources & Payroll	169	Medium	169	Medium	Dec, 2008
Facilities & Capital Assets	151	Medium	151	Medium	
Student Services	167	Medium	167	Medium	Jun, 2015
Information Technology	192	Medium	198	Medium	June, 2009
Government Aid & Grants (Special Education)	142	Medium	160	Medium	Jan, 2012 Jan, 2013

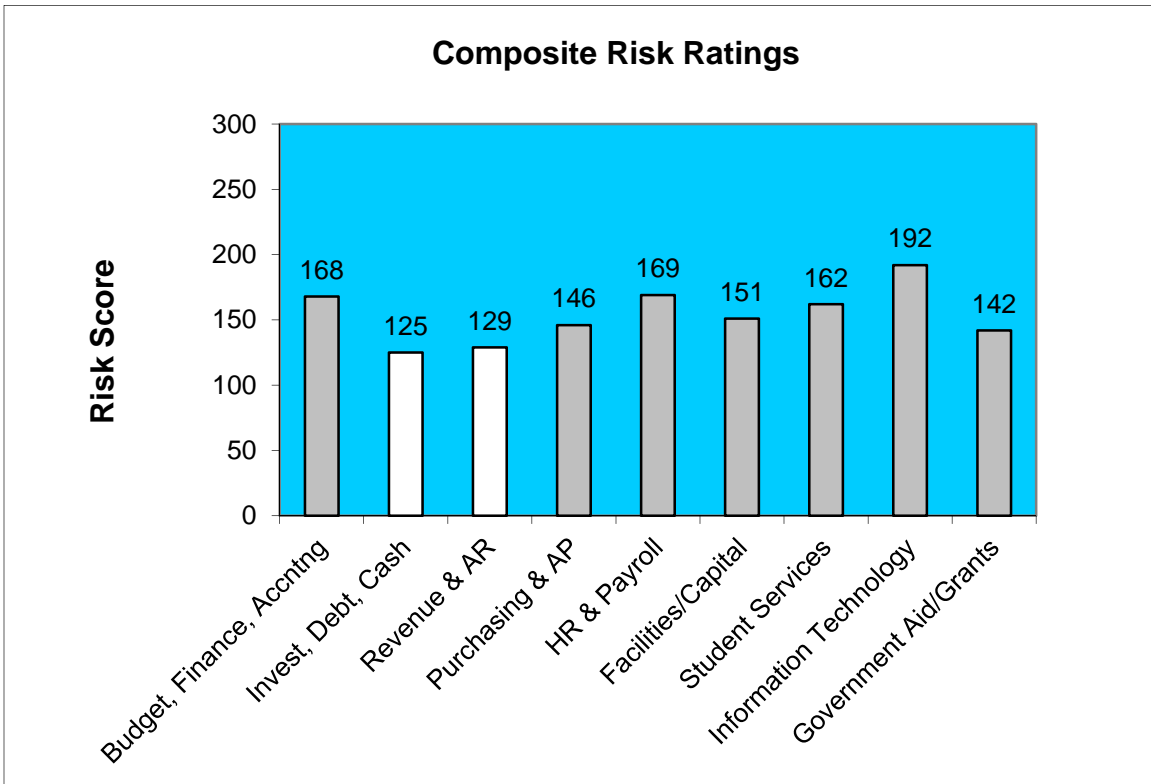


Chart Legend

High 211-300	
Medium 131-210	
Low <130	

Discussion and Risk Rating by Functional Areas

BUDGET, FINANCIAL ACCOUNTING & REPORTING

Risk Rating 168 Medium

This area is concerned with the budget development, implementation and monitoring process; financial accounting and reporting; the operations of the Business Office; and Board governance.

The District's adopted budget for FY15/16 is \$108,731,720 compared to the FY14/15 budget of \$111,162,832. The FY15/16 appropriations amount represents a budget decrease of approximately 2.19 % from the previous year. The District adopted a budget that is within the limits of the tax cap law which restricts the growth in the property tax levy to two percent a year or the rate of inflation, whichever is lower. A majority vote of at least sixty percent of voters can override the tax cap, and some provisions are made to exclude items such as voter approved capital expenditures and certain pension costs that exceed two percentage points per year.

As part of the District's strategic planning and budget development process, the Assistant Superintendent for Business maintains a Long Range Budget Plan. It includes a Comparative Financial Analysis which benchmarked the District's actual 2013-2014 expenses against five comparable Westchester school districts and demonstrated that the District's expenditures per pupil continue to exceed that of the comparable districts. Further the report demonstrates that the District community's financial ability to support the current level of spending is lower than that of the peer districts. Also, the District's budget development considerations include the decrease in student enrollment. On a positive note, the District is benefiting from a reduction in the NYS mandated Teachers Retirement System and Employee Retirement System employer contribution rates.

Since the previous risk assessment, the District's Administration personnel has stabilized following several changes. Personnel changes impacted the risk rating for this area.

The District continues to have adequate segregation of duties over financial and accounting responsibilities: The Bookkeeper posts all journal entries and cash receipts. The District Treasurer independently reviews and signs off on the journal entries. In addition, the District Treasurer prepares bank reconciliations and monthly budget status reports and the Treasurer's Reports for the Board. Also, the Assistant Superintendent for Business reviews the general fund account reconciliation as well as the Treasurer's report prior to the Board.

In terms of Board governance, the District has two Board Members that are serving in their fourth year, two Board Members serving in their third year, two Board Members serving in their second year and one Board Member with nine years of experience. Overall, the Board's operational disclosure practices exhibit an appropriate level of transparency and accountability. The District's practices are in compliance with the Open Meetings Law,

Chapter 603 of the Laws of 2011, which came into effect February 2012. Specifically, Board Policies, Board Meeting Agenda and Minutes, Board presentations and reports to the Board are available to all stakeholders on the District's website via Board Docs. In addition, the District posts its annual budget and audited financial statements on its website.

This area was rated a Medium Risk.

DEBT, INVESTMENTS and CASH
Risk Rating 125 Low

The review of Debt, Investments and Cash looks at the processes the District has in place to oversee issuing, monitoring and recording of debt; as well as policies and procedures for managing and monitoring investments and collateral, and cash management controls.

The District Treasurer is responsible for managing cash and monitoring debt and investments. The Treasurer maintains cash-flow statements, a debt service schedule, and makes periodic debt service payments. During FY15/16, the District has renewed \$1,203,200 in Bond Anticipation Notes "BANs" to refinance debt outstanding from prior year purchases of buses and vehicles.

Total long term liabilities for the District amounted to \$112,498,600 for the fiscal year ended June 30, 2015, compared to \$97,042,062 in the previous year. Specifically, the balance in long term liabilities reflects \$19,559,651 in Bonds Payable and Premium; \$7,454,228 in Energy Performance Contract Debt; \$2,861,002 in Compensated Absences; \$88,968 in Retirement Incentives Payable; \$1,392,070 in Net Pension Liability and \$81,142,681 in Other Post Employment Benefits ("OPEB"). The District made \$5,555,416 in OPEB payments; however, the District recognized an additional \$12,154,548 in OPEB obligations. The total OPEB Unfunded Actuarial Accrued Liability ("UAAL") for FY14/15 was \$177,853,802 with an Annual Required Contribution ("ARC") of \$18,748,334. The ARC represents the level of funding that, if paid on an ongoing basis, is projected to cover annual and amortized costs over the next thirty years. School districts are currently only allowed to fund on a pay-as-you-go basis.

The District has an investment policy, and maintains cash available for investment in a cooperative investment pool and other interest bearing accounts. At fiscal year ending June 30, 2015, the District held approximately \$26,827,103 in cash and cash equivalents for all funds including capital. Also, from a control perspective, the Business Office has a secure and dedicated computer with its use restricted solely for banking transactions made by the District Treasurer.

This area was rated a Low risk.

REVENUE and ACCOUNTS RECEIVABLE

Risk Rating 129 Low

The review of this area focuses on property tax and non-tax revenue, recording and reporting revenue, billing and maintaining accounts receivable, and other Treasury functions in the Business Office.

The District's budgeted source of revenues is property tax collections, charges for services, state aid, miscellaneous and other non-tax revenues, and appropriated fund balance. For FY14/15, the District's property tax revenues of \$90,484,611 accounted for approximately 83.4% of total General Fund revenues. The District reported total General Fund revenues of \$108,556,018 for the fiscal year ending June 30, 2015 compared to \$112,223,313 for the previous fiscal year which was consistent with the projected decreases in the FY14/15 budget.

The District continues to maintain its billing and Accounts Receivable ledger and aging reports on Finance Manager. In general, the District bills for Tuition, Arts & Education Programs, Fuel Usage, Facilities Use, Health Services, Print Shop services and other miscellaneous expenses. The combination of an automated system for billings and accounts receivables, administered with experienced staff, helps to maximize controls and reduce risks. Also, the District does not collect its own taxes. The towns of Lewisboro, North Salem, Bedford, and Pound Ridge are responsible for billing and collection of the taxes and guarantee the full payment of the District's property tax warrant. This lowers the overall risk in collecting and receiving property tax revenues.

The District Treasurer provides monthly revenue status reports to the Board. The reports are reviewed by the Assistant Superintendent for Business. The District Treasurer regularly monitors cash on hand and maintains fund balance reserves in interest bearing accounts. The District has various reserve funds for purposes such as retirement system contributions, tax certiorari, and debt service. Reserves help districts save up for future expenses, and can help decrease the need to rely exclusively on indebtedness to finance capital projects. In addition, maintaining an adequate level of reserves helps to lower the risk of any unanticipated events having a significant negative impact on the operating budget. The District is authorized to maintain up to 4% of the total budget in unassigned fund balance. At the end of FY14/15, the District held \$4,347,666 in unassigned fund balance, and was within the statutory limit.

This area was rated a Low risk.

PURCHASING and ACCOUNTS PAYABLE

Risk Rating 146 Medium

This area is concerned with the Purchasing function and Accounts Payable, Cash Disbursements, and the Internal Claims Audit processes.

The Purchasing Agent's duties and responsibilities include approval of new vendors and purchase orders, ensuring the District seeks competitive procurement methods by conducting bids and requests for proposals ("RFPs"); obtaining quotes from vendors; and ensuring compliance with the District's Purchasing Policy and New York State General Municipal Law ("GML"). Also, the Purchasing Agent manually tracks expenditures by vendor and legal thresholds, to ensure the District does not exceed the limit set by GML, before it is required to go out to bid. The Assistant Business Manager assists the purchasing function and reviews and approves purchase orders prior to the final approval by the Purchasing Agent.

The District continues to follow best practices by including detailed information on the face of purchase orders to facilitate vendor compliance with contractual terms and prevailing wage rates, where applicable, as well as state contract numbers and bid numbers. Bid awardees are required to disclose any conflict of interests as well. In addition, at the beginning of the school year, the Purchasing Agent provides Building staff responsible for processing purchase requisitions with a copy of the District's Purchasing Procedures Handbook and a list of New York State, County, and BOCES Contracts in which the District participates.

The Accounts Payable Department consists of an Accounts Payable ("AP") Clerk who directly reports to the Assistant Superintendent for Business. The Accounts Payable Clerk prepares claims for payment and processes cash disbursements on a weekly basis. Also, the Accounts Payable Clerk generates the Claims Warrants and prints the checks. All warrants and checks are audited by the Internal Claims Auditor. The Purchasing Agent provides the Internal Claims Auditor a binder with copies of vendor contracts and bid awards as a reference tool to facilitate the efficient audit of claims and reconciliation of invoice pricing to contractual and bid terms.

The risk rating for this area is Medium.

HUMAN RESOURCES and PAYROLL

Risk Rating 169 Medium

Both Human Resources and Payroll areas are closely linked in the administration of personnel, payroll, and benefits. In addition, this area is concerned with District compliance to Board Policies, union contracts and bargaining agreements, and applicable state and federal laws and regulations. The District's largest expense is salaries, wages and benefits. This functional area is a highly significant one, not only due to the magnitude of its share of the District's budget, but also due to the complexity and sensitivity of its operations and ensuring compliance.

The District hired an Assistant Superintendent for Human Resources in July, 2014. A new Personnel Assistant was also hired in January, 2015. In order to expedite emergency hires, the Board approved a new Policy that allows the Superintendent to hire emergency hires prior to Board approval.

Employee benefits costs in FY14/15 decreased by \$2,137,212 (-6.64%) from the previous fiscal year mainly due to decreases in Hospital and Medical Insurance payments and reductions in employer contribution rates for the Teachers Retirement System and social security payments. Effective July 1, 2014, the District switched from a self-insured plan to NYSHIP.

All District personnel have now fully transitioned into Aesop, the automated employee absence management and substitute placement system. The one exception is the Transportation Department, which uses Finance Manager's Timepiece timekeeping and attendance system. In addition, all District staff has been given email to facilitate District wide communications. The Department uses My Learning Plan, the automated planning, management, and reporting of professional development system. The system is accessible to staff to directly go online to register and request course approvals for professional development offerings. Also, in order to support instructional staff with meeting the mandated requirements of Response to Intervention and Annual Professional Performance Review ("APPR") Plans, as well as the implementation of Professional Learning Communities ("PLCs") at the building level, an appropriate level of support has been maintained in these areas for FY15/16.

This area was rated a Medium risk.

FACILITIES and CAPITAL ASSETS

Risk Rating 151 Medium

This area includes buildings and grounds, facilities maintenance, custodial operations, building use, capital projects, school building improvements and new construction, capital assets and inventory controls.

The Department of Operations & Maintenance ("O&M") is headed by the Director, who was hired in July, 2014 and consists of a staff of approximately fifty custodians, maintenance and grounds workers, and clerical support. The O&M budget is comprised of operational expenses to maintain the District's grounds and physical plant, as well as utility and fuel costs, supplies, equipment, and salaries of Department staff. In addition, maintenance costs include preventative care and maintenance on critical electrical, heating and cooling systems throughout the District's buildings. O&M costs were budgeted at \$6,803,409 for FY15/16, a decrease of \$138,149 from the prior fiscal year.

The O&M Department maintains an automated work order and preventative maintenance system, School Dude. Facilities use scheduling is also managed on School Dude and the Facilities Use policy has been updated to permit better screening and verification of not-for-profit applicants and review of the proper liability insurance coverage documentation. In addition to O&M in-house operations, the Department staff oversees ongoing capital projects and contracted service repairs.

As part of the District's long-range planning efforts, the District is completing its Building Condition Survey ("BCS"). The BCS is a comprehensive review of the condition of all facilities and building systems, required by law every five years. The previous long range plan identified approximately \$29 million in needed capital improvements. The District continues to fund its inter-fund transfer from the general fund to the capital fund to address items identified in its long-range plan. In addition, the District is currently completing an Energy Performance Contract ("EPC"). An EPC provides for long-term project financing of energy efficiencies and renewable energy systems, with guaranteed built in savings to cover the cost of the project. Overall, the capital project and EPC will address approximately \$7.5 million in items identified in the long-range facilities plan. During the summer and fall of 2015, the District completed a track and field replacement at the John Jay Cross River campus.

This section has been rated a Medium risk.

STUDENT SERVICES

Risk Rating 167 Medium

This area includes Transportation, Food Service, Extraclassroom and Co-curricular Activities, Interscholastic Athletics, and Safety and Security. Although these areas represent a small percentage of the District's budget, they directly impact the District's mission and objectives. In addition, these areas tend to be more operationally decentralized, and have a potentially greater impact on reputational risk to the District.

The District provides District-owned pupil transportation services for regular school, out of District special education and parochial placements, athletic events, and field trips. For FY15/16, pupil transportation costs are budgeted at \$4,827,264 compared to \$5,030,739 the previous fiscal year. The District utilizes the Transfinder scheduling system for its routes. The drivers are well experienced since the District enjoys a very low turnover rate with its drivers.

The District provides a food service program to students, administered by an outside contractor. The District's Food Service Management Company ("FSMC") operates five cafeterias in all the school buildings. The food service program functions as a self-sustaining operation. In FY14/15, school lunch fund revenues totaled \$1,113,710 and cost of food sales totaled \$1,131,535. The District follows best practice with an active Wellness Committee that meets and reviews menu items for wellness, building and equipment issues, changes in program, and contract compliance issues.

The District has approximately 41 student clubs that comprise its Extraclassroom Activity Funds ("ECAAF"). Most student clubs are in the High School. The only financially active student club in the Middle School is the Student Council. According to the District's FY14/15 External Audit, student clubs had total cash receipts of \$230,088 and total cash disbursements of \$216,767. These figures represent a very small amount of financial activity in comparison to the District's budget. However, due to the nature of

the activity, the District should ensure it has adequate oversight over operations. Accordingly, the Board/Audit Committee authorized an audit of the ECAF's operations in FY14/15. Internal Audit made several recommendations to improve operations and controls and the District has either implemented or is in the process of implementing the recommendations which can be viewed in the separate audit report. In conjunction with implementing the increased controls, the Administration conducted a comprehensive training session on September 29, 2015 which included the Central Treasurers, Faculty Advisors and Student Treasurers. Also, Central Treasurers now have on-line access (read only) to their respective ECAF checking accounts to permit a more timely access to the bank records.

The Director of Athletics, Physical Education ("PE"), Health and Wellness oversees the District's Athletic program, as well as the curriculum for PE and Health. The Interscholastic Activities (Athletics) budget for FY15/16 is \$937,549, compared to \$872,663 the previous year. This represents a budget increase of \$64,886.

This area was given a Medium risk rating.

INFORMATION TECHNOLOGY

Risk Rating 192 Medium

This area includes IT Strategy and Planning, Outsourced Vendor Management, Business Continuity Planning, IT Infrastructure and Maintenance, Information Security, Governance, Systems Development and Maintenance, Systems Support and Critical Systems.

Since the last risk assessment update the District has held several Technology Plan Development meetings to collaborate on the District's multi-year plan and complete the Instructional Technology Plan for 2015. This plan, which was submitted in compliance with the Smart Schools Bond Act, details the following:

- Vision and Goals of the District
- Technology, Infrastructure and Software Inventory
- Curriculum and Instruction Plans Related to Technology
- Professional Development Plans
- Technology Investment Plan
- Status of Technology Initiatives and Community Connectivity
- Implementation Plans
- Monitoring and Evaluation Plans

In addition, the following key technology initiatives have been implemented:

- A new Voice over Internet Protocol (VoIP) phone system was installed to integrate with the current public announcement system, intercom, 911 capabilities and door access intercom.

- The security system was upgraded with a new security server and cameras to replace obsolete and end-of-life systems.
- The Microsoft System Center Configuration Manager (SCCM) was acquired to assist in the mass deployment of operating system, application system and software updates.
- The Barracuda Message Archiver appliance was installed for the storage and retrieval of email.
- An additional Wireless System Controller and Mobile Device Manager was installed to support District devices and the Bring Your Own Device (BYOD) initiative.
- A third virtual server was built for increased redundancy.
- Continuous equipment upgrade of computers and other devices for instruction and computer-based assessments.

GOVERNMENT AID and GRANTS

Risk Rating 142 Medium

This area includes grants and aid from the state and federal governments, and foundation and other not-for-profit aid and donations. This area also includes Special Education, since a large proportion of federal aid goes toward funding these services.

In general, the District receives both state and federal aid. In terms of state aid, the District budgeted receipt of \$7,888,157 in state aid in FY15/16 compared to \$7,225,922 in FY14/15. Overall, state aid represents approximately 7.3% of the General Fund budget. The District receives most of its federal aid through federal grants. A majority of the federal grant monies are dedicated to funding services for students with special needs. Specifically, of the \$1,281,201 awarded (and/or carried over from the prior year) in FY15/16, \$1,086,811 or 85% percent of the funds are IDEA Part B Sections 611 and 619 grants directed towards educating students with disabilities. The remaining monies are Title I and II grants.

The District's budget for special education in FY15/16 is \$11,823,430, compared to \$11,445,431 the previous year. The Department saw a slight increase in the number of classified students to 14%, slightly above the state average of 13%. Also, the Department made some personnel changes to better align staff with student needs, and bring occupational therapy services in-house. In general, special education accounts for 10.9 % of the District's total budget.

This area was evaluated a Medium risk.



Recommended Internal Audit Plan

Katonah-Lewisboro Union Free School District	FY Audit Hours	
	15/16	Future
Risk Assessment Update	60	X
Budget, Financial Accounting & Reporting		X
Review of internal controls related to fiscal accountability and budget control, and operations in the Business Office.		
Debt, Investments and Cash		X
Review of internal controls over debt and investment monitoring and cash management.		
Revenue and Accounts Receivables		X
Review of internal controls over revenue, billing & collections, and accounts receivables.		
Purchasing and Accounts Payable		X
Review of the internal controls over purchasing, accounts payable, and the internal claims audit process.		
Human Resources and Payroll		X
Review of internal controls over human resources and payroll operations and prior Corrective Action Plan.	125	
Facilities and Capital Assets		X
Review of internal controls over facilities operations, capital project monitoring and reporting, and capital asset accounting and inventory control.		
Student Services		X
Review internal controls over Extraclassroom Activity Funds, Food Service Program, Safety & Security, Pupil Transportation, etc.		
Information Technology		X
Review of general computer controls		
Government Aid and Grants		X
Follow-up review to Corrective Action Plan in response to Internal Audit.		
Board/Audit Committee Presentations, Planning and Meetings	25	
Total Internal Audit Hours	210	