



***Risk Assessment FY 2016/2017
& Recommended Audit Plan
May 2017***



May 25, 2017

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:

- Capital Project and Construction Management

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 on May 22nd to discuss the report and the recommended internal audit plan. 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 cursive script that reads "Accume Partners".

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	FY16/17		FY15/16	
	Risk Rating	Level	Risk Rating	Level
Budget, Financial Accounting & Reporting	163	Medium	168	Medium
Debt, Investments & Cash	125	Low	125	Low
Revenues & Accounts Receivable	129	Low	129	Low
Purchasing & Accounts Payable	146	Medium	146	Medium
Human Resources & Payroll	169	Medium	169	Medium
Facilities & Capital Assets	151	Medium	151	Medium
Student Services	167	Medium	167	Medium
Information Technology	187	Medium	192	Medium
Government Aid & Grants (Special Education)	132	Medium	142	Medium

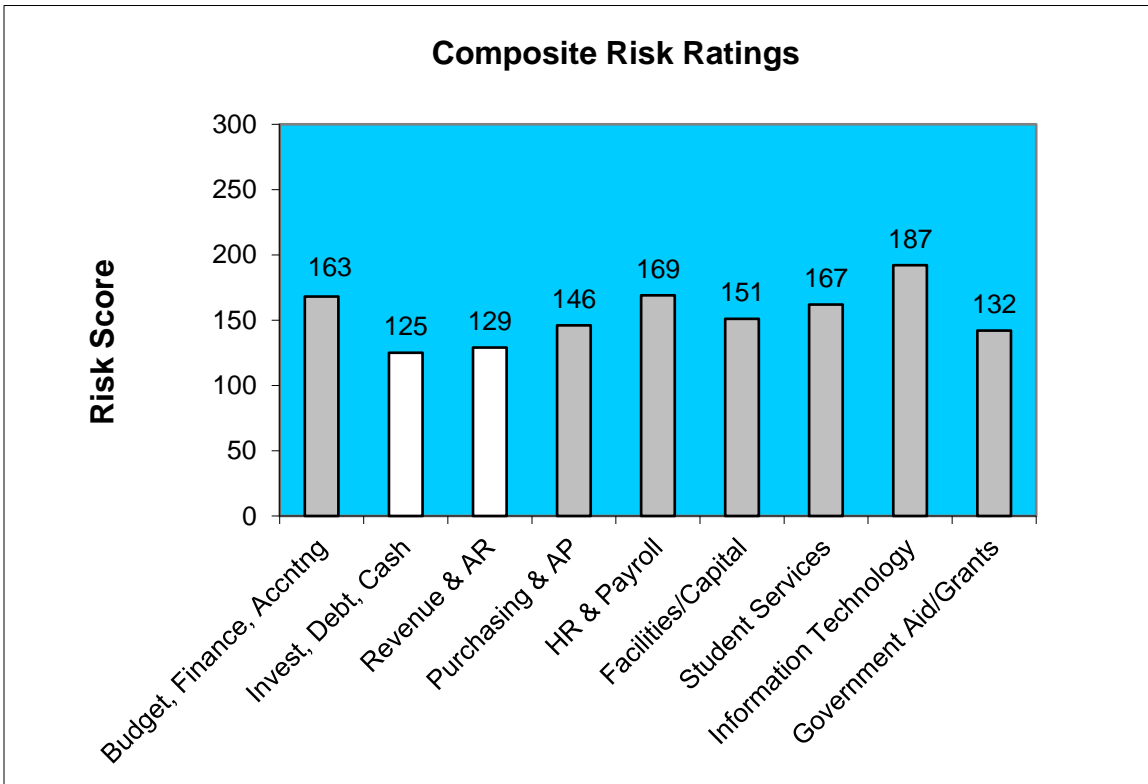


Chart Legend

High 211-300	
Medium 131-210	
Low <130	



Discussion and Risk Rating by Functional Areas

BUDGET, FINANCIAL ACCOUNTING & REPORTING

Risk Rating 163 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 FY16/17 is \$105,994,936 compared to the FY15/16 budget of \$108,731,720. The FY16/17 appropriations amount represents a budget decrease of approximately 2.52 % 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 2014-2015 expenses against five comparable Westchester school districts and demonstrated that the District's expenditures per pupil has begun to decrease. 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.

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.

During the summer of 2016, the School Business Administrator resigned from the District in order to accept a promotional position in another Westchester school district. The incumbent Treasurer was promoted to the School Business Administrator position and a



new, experienced Treasurer was hired. The internal promotion, coupled with an experienced new hire has helped to ensure continuity within the Business Office

In terms of Board governance, the District has two Board Members that are serving in their fifth year, two Board Members serving in their fourth year, two Board Members serving in their third year and one Board Member with one year 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, internal audits and risk assessments, audits from the NYS Comptroller, updated demographic projections 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.

Total long term liabilities for the District amounted to \$126,027,619 for the fiscal year ended June 30, 2016, compared to \$112,498,600 in the previous year. Specifically, the balance in long term liabilities reflects \$15,328,528 in Bonds Payable and Premium; \$7,197,382 in Energy Performance Contract Debt; \$2,925,151 in Compensated Absences; \$6,559,768 in Net Pension Liability and \$94,016,790 in Other Post Employment Benefits ("OPEB"). The District made \$5,701,604 in OPEB payments; however, the District recognized an additional \$18,575,713 in OPEB obligations. The net impact of the OPEB payment and the recognition of additional obligations resulted in the overall long-term liability associated with OPEB increasing by \$12,874,109. The total OPEB Unfunded Actuarial Accrued Liability ("UAAL") for FY15/16 was \$188,457,106 with an Annual Required Contribution ("ARC") of \$19,797,027. 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. As mentioned in the external auditors' financial statements, changes associated with GASB75 will require that the June 2018 financial statements recognize total OPEB liability on the balance sheet rather than the amortized amount. Funding obligations will remain unchanged.



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, 2016, the District held approximately \$23,465,847 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.

There have been no major procedural/control changes since our last risk assessment update.

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 FY15/16, the District's property tax revenues of \$87,166,948 accounted for approximately 80% of total General Fund revenues. The District reported total General Fund revenues, inclusive of \$10,095,966 of refunding bonds and issuance premiums, of \$115,811,186 for the fiscal year ending June 30, 2016 compared to \$108,556,018 for the previous fiscal year. The variance is directly related to the aforementioned issuance premiums and bonds.

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 FY15/16, the District held \$4,012,694 in unassigned fund balance (3.79%), and was within the statutory limit.

There have been no major procedural/control changes since our last risk assessment update.

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.

This past summer, in response to the audit completed by the NYS Comptroller, a number of professional services were re-solicited. The Business Office also completed re-pricing on legal services and reported that information to the Board.

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.



There have been no major procedural/control changes since our last risk assessment update.

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.

All District personnel have 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.

Internal Audit conducted an audit of this area in 2016. The overall rating was "Satisfactory" and improvement recommendations have or are in the process of being implemented.

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 and consists of a staff of approximately forty-seven 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 \$6,589,905 for FY16/17, a decrease of \$213,504 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. Starting with this year, the New York State Insurance Reciprocal reviews the coverage documentation for all use of facilities requests and/or contractors to ensure proper coverage and compliance. 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 completed 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 most recently completed plan identified approximately \$21 million in 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 recently completed 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 addressed approximately \$7.5 million in items identified in the long-range facilities plan. The District anticipates that the measurement and verification process related to the EPC work will be completed in August, 2017. New projects for this year included a replacement roof for Meadow Pond ES as well as ongoing floor replacements utilizing resilient, low maintenance vinyl.

There have been no major procedural/control changes since our last risk assessment update.

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



FY16/17, pupil transportation costs are budgeted at \$4,901,162 compared to \$4,827,264 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. 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 43 student clubs that comprise its Extracurricular Activity Funds ("ECAF"). 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 FY15/16 External Audit, student clubs had total cash receipts of \$151,503 and total cash disbursements of \$171,509. 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 implemented 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 (for the 2nd year in a row) on September 28, 2016 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 FY16/17 is \$918,910, compared to \$937,549 the previous year.

This area was given a Medium risk rating.

INFORMATION TECHNOLOGY

Risk Rating 187 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 updated its multi-year plan for Instructional Technology; continued with the Voice over Internet Protocol (VoIP) phone

upgrade project which includes new CISCO phones with security features and an enhanced emergency call management system; upgraded the security infrastructure with new IP security cameras; and implemented random strong passwords for students. The District is also in the process of updating the Acceptable Use Policies to include data privacy components. In addition, upgrades of software, application systems, computers and other devices for instruction and computer-based assessments are performed on an ongoing basis.

The District continues to hold monthly District-wide Technology Committee meetings to discuss strategic and organizational planning for technology. These meetings focus on technology needs assessments, updates to the multi-year plan, technology initiatives, best/standard practices and review of software and hardware requests to ensure adherence to student data privacy protocols and appropriate usage. Current and ongoing technology initiatives include the following:

- Continue to provide teachers and staff with Professional Development on the application of new technology systems
- Continue to upgrade computer hardware and devices based on refreshment cycles and annual needs assessments
- Upgrade existing systems and application software as required by users
- Upgrade the wireless infrastructure, switches and cabling to accommodate the District's growing needs
- Increase WAN connection speeds and Internet bandwidth
- Continue to upgrade VOIP phones and security cameras

GOVERNMENT AID and GRANTS

Risk Rating 132 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 \$8,469,699 in state aid in FY16/17 compared to \$7,888,157 in FY15/16. Overall, state aid represents approximately 8% 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 FY16/17 is \$12,163,183, compared to \$11,823,430 the previous year. The Department saw a slight decrease in the number of

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classified students to 13.1%, slightly below the state average of 14.7%. 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 11.5 % 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	
	16/17	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.		
Facilities and Capital Assets		X
Review of internal controls over Capital Project and Construction Management functions.	125	
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	