# SUSQUEHANNA COUNTY CAREER & TECHNOLOGY CENTER SUSQUEHANNA COUNTY, PENNSYLVANIA PERFORMANCE AUDIT REPORT

JANUARY 2012

The Honorable Tom Corbett Governor Commonwealth of Pennsylvania Harrisburg, Pennsylvania 17120 Mr. Chuck Place
Joint Operating Committee Chairperson
Susquehanna County Career & Technology Center
P.O. Box 100
1 Schoolhouse Road
Dimock, Pennsylvania 18816

Dear Governor Corbett and Mr. Place:

We conducted a performance audit of the Susquehanna County Career & Technology Center (SCCTC) to determine its compliance with applicable state laws, regulations, contracts, grant requirements and administrative procedures. Our audit covered the period April 24, 2009 through June 16, 2011, except as otherwise indicated in the report. Additionally, compliance specific to state subsidy and reimbursements was determined for the school years ended June 30, 2010 and June 30, 2009. 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 SCCTC complied, in all significant respects, with applicable state laws, regulations, contracts, grant requirements, and administrative procedures.

Sincerely,

/s/ JACK WAGNER Auditor General

January 11, 2012

cc: SUSQUEHANNA COUNTY CAREER & TECHNOLOGY CENTER Joint Operating Committee Members



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### **Executive Summary**

#### **Audit Work**

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

Our audit scope covered the period April 24, 2009 through June 16, 2011, 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 2009-10 and 2008-09.

#### **School Background**

According to School officials, in school year 2009-10 the SCCTC provided educational services to 315 secondary pupils and 9 post-secondary pupils through the employment of 15 teachers, 8 full-time and part-time support personnel, and 5 administrators. The operation, administration and management of the school are directed by a joint operating committee (JOC) which is comprised of nine members from the Elk Lake School District. Lastly, the SCCTC received \$392,482 in state funding in school year 2009-10.

#### **Audit Conclusion and Results**

Our audit found that the SCCTC complied, in all significant respects, with applicable state laws, regulations, contracts, grant requirements, and administrative procedures. We report no findings or observations in this report.

#### Status of Prior Audit Findings and

Observations. With regard to the status of our prior audit recommendations to the SCCTC from an audit we conducted of the 2007-08 and 2006-07 school years, we found the SCCTC had not taken appropriate corrective action in implementing all of our recommendations pertaining to outside vendor access to the student accounting applications (see page 7).



## 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.

#### **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.

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 April 24, 2009 through June 16, 2011.

Regarding state subsidy and reimbursements, our audit covered school years 2009-10 and 2008-09.

While all LEAs 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.

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 SCCTC'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 objectives:

- ✓ Were professional employees certified for the positions they held?
- ✓ Is the School's pupil transportation department, including any contracted vendors, in compliance with applicable state laws and procedures?
- ✓ Does the School ensure that Joint Operating Committee members appropriately comply with the Public Official and Employee Ethics Act?
- ✓ Are there any declining fund balances which may impose risk to the fiscal viability of the School?

- ✓ Did the School 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 School taking appropriate steps to ensure school safety?
- ✓ Did the School use an outside vendor to maintain its membership data and if so, are there internal controls in place related to vendor access?
- ✓ Did the School take appropriate corrective action to address recommendations made in our prior audits?

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

SCCTC management is responsible for establishing and maintaining effective internal controls to provide reasonable assurance that the School 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, pupil transportation, and comparative financial information.

#### 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.

Our audit examined the following:

- Records pertaining to professional employee certification, state ethics compliance, and financial stability.
- Items such as meeting minutes.

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

Lastly, to determine the status of our audit recommendations made in a prior audit report released on December 3, 2009, we reviewed the SCCTC's response to DE dated December 9, 2010. We then performed additional audit procedures targeting the previously reported matters.

# **Findings and Observations**

For the audited period, our audit of the Susquehanna County Career and Technology Center resulted in no findings or observations.

# **Status of Prior Audit Findings and Observations**

Our prior audit of the Susquehanna County Career & Technology Center (SCCTC) for the school years 2007-08 and 2006-07 resulted in one observation. The observation pertained to unmonitored vendor system access and logical access control weaknesses. As part of our current audit, we determined the status of corrective action taken by the SCCTC to implement our prior recommendations. We analyzed the SCCTC Superintendent's written response provided to the Department of Education (DE), performed audit procedures, and questioned District personnel regarding the prior observation. As shown below, we found that the SCCTC did not implement all recommendations related to their logical access control weaknesses.

#### School Years 2007-08 and 2006-07 Auditor General Performance Audit Report

Observation: Unmonitored Vendor System Access and Logical Access Control Weaknesses

Observation Summary: Our prior audit found that the SCCTC uses software purchased from an

outside vendor for its critical student accounting applications (membership and attendance). The software vendor has remote access

into the SCCTC network servers.

Recommendations: Our audit observation recommended that the SCCTC:

- 1. Develop an updated agreement with the vendor to provide student accounting applications and related information technology (IT) services. The agreement should cover legal, financial, organizational, documentary, performance, security, intellectual property, and termination responsibilities and liabilities (including penalty clauses). All contracts and contract changes should be reviewed by legal advisors. The updated signed contract with the vendor should contain a non-disclosure agreement for the SCCTC proprietary information.
- 2. Ensure that the Acceptable Use Policy includes provisions for authentication (password security and syntax requirements).
- 3. Establish separate IT policies and procedures for controlling the activities of vendors/consultants and have the vendor sign this policy, or the SCCTC should require the vendor to sign the School's Acceptable Use Policy.
- 4. Develop policies and procedures to require written authorization when adding, deleting, or changing a userID.

- 5. Maintain documentation to evidence that terminated employees are properly removed from the system in a timely manner.
- 6. 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 SCCTC should lock out users after three unsuccessful attempts and log users off the system after a period of inactivity (i.e., 60 minutes maximum).
- 7. Generate monitoring reports (including firewall logs) of vendor and employee 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 SCCTC should review theses reports to determine that the access was appropriate and that data was not improperly altered. The SCCTC should also ensure it is maintaining evidence to support this monitoring and review.
- 8. Ensure that the upgrades/updates to the SCCTC system are made only after receipt of written authorization from appropriate SCCTC officials.
- 9. Develop and maintain a list of authorized individuals with access to the hardware (servers) that contains the membership/attendance data.

#### **Current Status:**

During our current audit procedures we found that the SCCTC did not implement our recommendation to change passwords every 30 days and to use passwords that are a minimum length of eight characters and include alpha, numeric, and special characters. However, the SCCTC did implement our other recommendations. We will follow-up on the status of the remaining recommendations during our next audit.

#### **Distribution List**

This report was initially distributed to the career & technology center's superintendent of record, the joint operating committee, our website address at www.auditorgen.state.pa.us, and the following:

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

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