

Eastern Suffolk BOCES Corrective Action Plan

Risk Assessment Update January 18, 2023 Cullen & Danowski, LLP			
Findings and Recommendations	ESBOCES Response/Corrective Actions	Responsible Person(s)	Status
Reportable Conditions: None			
<p>Category: <u>Purchasing Process – Contracts: Education Law 2D Compliance</u> <u>Recommendation and Related Updates:</u></p> <p><i><u>Finding and Recommendation – Risk Assessment Update 2022-23</u></i> We found that ESBOCES has adopted a policy regarding Clickwrap Agreements, which relates to an online agreement that users agree to by clicking a button or a box that says “I agree”. This policy has set up a procedure where a Director can choose to use an application or product and enter into a licensing agreement for the agency without having a formal contract in place. However, the ESBOCES Data Protection Officer is not involved in the review process and some of the applications procured may have potential Education Law 2D compliance issues (i.e., user agreement states that data entered into the app will be used at their discretion).</p> <p>We recommend that ESBOCES consider revising procedures to ensure all agreements related to software are reviewed by the ESBOCES Data Protection Officer to ensure compliance with Education Law 2D.</p>	<p>ESBOCES will consider revising procedures to ensure all agreements related to software are reviewed by the ESBOCES Data Protection Officer to ensure compliance with Education Law 2D.</p>	<p>Stucchio/ Eckstein</p>	<p>Estimated Completion June 2023</p>
<p>Category: <u>New Hires – Maintain Employee Records Electronically</u> <u>Recommendation and Related Updates:</u></p> <p><u>Agreed-Upon Procedures – 2016</u></p> <p>We recommended that ESBOCES consider using software to maintain employee records electronically to enhance operational efficiency.</p>			

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<p><u>Risk Assessment Update – 2017-2019</u></p> <p>We noted that the Human Resources (HR) Department and Management Services were in the process of reviewing software solutions that automate the hiring and on-boarding procedure, support electronic file retention and generate the personnel agenda for the Board meetings. We found that the HR Department had chosen a web-based program (SchoolFront) to facilitate the hiring process through automation and ESBOCES was negotiating the final terms and conditions of the agreement. We understood that SchoolFront integrates with the WinCap financial system. We noted that the procedures related to SchoolFront were not yet operational. We understood that the use of SchoolFront would start with recruiting and hiring, followed by the on-boarding process and this would become the starting point for paperless HR records.</p> <p><u>Risk Assessment Update – 2020-2021</u></p> <p>We noted that SchoolFront, the software application that supports automation of recruitment, hiring and on-boarding functions, will also be used to store digital employee records. We were informed that ESBOCES planned to implement the on-boarding module, which included a file management component, after completing the current initiative related to the recruitment module.</p> <p><u>Risk Assessment Update – 2021-2022</u></p> <p>We found that ESBOCES has set up a phased approach related to the implementation of SchoolFront for recruitment and on-boarding that started with a pilot group during the summer of 2021. We understand that there were lessons learned as a result of this pilot group managing the new hire process in SchoolFront and ESBOCES set up training for staff during the fall of 2021. We were informed that the HR Department plans to move forward with rolling out the use of SchoolFront with other pilot groups during the 2021-22 year.</p> <p><u>Risk Assessment Update – 2022-23</u></p>			

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<p><i>We note that there has been a number of administrator and support staff changes in the HR Department that has delayed the roll out of the SchoolFront program. This program supports automation of recruitment and onboarding functions and will be used to store digital employee records. The HR Department plans to continue with the phased approach to implement the onboarding module, which includes a file management component, to be fully implemented during the 2023-24 fiscal year.</i></p>	<p>School Front, a software application that supports automation of recruitment and onboarding functions, will be used to store digital employee records. The onboarding module, which includes a file management component, will be implemented using a phased in approach. The software is scheduled to be fully implemented by June 2023.</p>	<p>Cook</p>	<p>Estimated Completion June 2023</p>
<p><u>Category: New Hires – Background Summary Checklist Recommendation and Related Updates:</u></p> <p><u>Agreed-Upon Procedures – 2016</u></p> <p>We recommended that ESBOCES determine if the Background Summary Checklist should be included in the employee folder, since this provided details related to the background procedures performed by the clerks in the HR Department, or should be destroyed along with the <i>Background Check Report</i> due to privacy reasons.</p> <p><u>Risk Assessment Update – 2017-2019</u></p> <p>We noted that the HR Department and Management Services were in the process of reviewing software solutions that automate the hiring procedure, generate the personnel agenda and support electronic file retention. The Background Summary Checklist had been used as evidence that internal procedures were followed. We understood that ESBOCES planned to address this item in conjunction with the implementation of software (SchoolFront) as noted in the previous comment. The HR Department was using the Background Summary Checklist as part of the hiring process and files the checklist in the respective employee’s personnel folder. ESBOCES planned to make a determination about this checklist after making a</p>			

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<p>decision related to a software solution. <u>Risk Assessment Update – 2020-2021</u></p> <p>We found that the HR Department and Management Services were reviewing software solutions that automate the hiring and on-boarding processes, generate the personnel section of the Board agenda and support electronic file retention. The Background Summary Checklist was used as evidence that internal manual procedures were followed as required and the goal was to eliminate the need for this checklist with an automated system.</p> <p><u>Risk Assessment Update – 2021-2022</u></p> <p>We found that ESBOCES plans to eliminate the Background Summary Checklist after the rollout of the SchoolFront program for on-boarding and recruitment, as noted above.</p> <p><u>Risk Assessment Update – 2022-2023</u></p> <p><i>We found that the completion of the onboarding module scheduled to be fully implemented during the 2023-24 fiscal year, as noted above, will eliminate the Background Summary Checklist.</i></p>	<p>School Front, a software application that supports automation of recruitment and onboarding functions, will be used to store digital employee records. The onboarding module, which includes a file management component, will be implemented using a phased in approach. The implementation will eliminate the Background Summary Checklist.</p>	<p>Cook</p>	<p>Estimated Completion June 2023</p>
<p>Category: <u>Payroll – Number of Vacation Days</u> <u>Recommendation and Related Updates:</u></p> <p><u>Agreed-Upon Procedures – 2020-21</u></p> <p>We recommended that ESBOCES consider revising the collective bargaining agreements to include 260 days related to vacation days,</p>			

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<p>instead of the current language that is silent with respect to the number of vacation days. The inclusion of 260 days for vacation days would be similar to the 260 days for sick days and would establish consistency and create a standard number of days regarding benefit time payouts.</p> <p><u>Risk Assessment Update – 2022-23</u></p> <p><i>We recommended that ESBOCES consider revising the collective bargaining agreements to include 260 days related to vacation days, instead of the current language that is silent with respect to the number of vacation days. The inclusion of 260 days for vacation days would be similar to the 260 days for sick days and would establish consistency and create a standard number of days regarding benefit time payouts.</i></p>	<p>HR will add this as a negotiating proposal to renewing contracts.</p>	<p>Cook</p>	<p>Ongoing Through 2024</p>
<p>Category: <u>Payroll – Notification of Intent to Retire</u></p> <p><u>Recommendation and Related Updates:</u></p> <p><u>Agreed-Upon Procedures – 2020-21</u></p> <p>We recommended that ESBOCES consider revising the UPSEU contract and any other collective bargaining agreement with similar language related to notices of retirement, to change the language from “shall” to “must” to enhance operations by providing ESBOCES with sufficient time to hire employees to fill the positions vacated by retirements of these staff members.</p> <p><u>Risk Assessment Update – 2022-23</u></p> <p><i>We recommended that ESBOCES consider revising the UPSEU contract and any other collective bargaining agreement with similar language related to notices of retirement, to change the language from “shall” to “must” to enhance operations by providing ESBOCES with sufficient time to hire employees to fill the positions vacated by retirements of these staff members.</i></p>	<p>HR will add this as a negotiating proposal to renewing contracts.</p>	<p>Cook</p>	<p>Ongoing Through 2024</p>

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<p><u>Category: Purchasing Process – Contracts: Processing Unit’s Organizational Structure and Duties</u></p> <p><u>Recommendation and Related Updates:</u></p> <p><u>Agreed-Upon Procedures – 2020-21</u></p> <p>We recommended that ESBOCES assess the operations of the Contract Processing Unit that includes staffing, duties and organizational structure of the unit. We also recommend that this assessment include a determination regarding the contracts that are handled outside of the Contract Processing Unit (i.e., Arts in Education and Professional Development (CoSer 531)).</p> <p><u>Risk Assessment Update – 2022-23</u></p> <p><i>We recommended that ESBOCES assess the operations of the Contract Processing Unit that includes staffing, duties and organizational structure of the unit. We also recommend that this assessment include a determination regarding the contracts that are handled outside of the Contract Processing Unit (i.e., Arts in Education and Professional Development (CoSer 531)).</i></p>	<p>The contracts department develop a staffing plan and are in place make a determination about contracts processed outside the department.</p>	<p>Stucchio/ Eckstein</p>	<p>June 2023</p>