

2020-21
CORRECTIVE ACTION PLAN
STATUS REPORT
FALL 2020

**Eastern Suffolk BOCES
Corrective Action Plan**

Independent Accountant's Report on Applying Agreed-Upon Procedures Cullen & Danowski, LLP Report dated August 2, 2016			
Findings and Recommendations	ESBOCES Response/Corrective Actions	Responsible Person(s)	Status
Reportable Conditions: None			
Category: Cash and Cash Receipts			
Findings:			
Review of the Board policies and ES BOCES procedures and interviews with ES BOCES employees related to collection of funds and cash receipts noted:			
<ul style="list-style-type: none"> • When cash or checks are received by the Business Office, there is a formal sign-off on the Cash Transmittal Form and the Business Office provides a copy to the respective program or department that submitted the funds. This is a good control because the program or department can verify the accuracy and timeliness of the deposit. • There were 2 cash receipts clerks who utilized an Excel file to list all of the Hold Harmless Agreement/Invoice Forms to properly support the amount of receipts from the program (i.e., culinary, animal science and cosmetology). This facilitated the verification of the amount of funds received from the program and submitted to the Business Office, as well as, provided adequate supporting documentation. • Several locations maintain copies of the Hold Harmless Agreement/Invoice Forms with the respective receipts that are sent to the Business Office for deposit, which provides adequate records to support the amount of funds. • There were 2 locations where the funds were 			

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<p>sometimes retained in the safe for an extended period of time (i.e. more than 1 week) before being deposited in the bank or submitted to the Business Office.</p> <ul style="list-style-type: none"> • There were several locations where sealed bank bags were not used when preparing and submitting the receipts to the Business Office. In addition, there were several locations using the sealed bank bags; however, the locations did not use the Delivery Bag Verification Form which is used by most locations. • There were 2 locations that did not have a safe or lockbox to properly safeguard the receipts until the deposit is picked up by the ESBOCES courier. • At all locations, the Cash Transmittal Forms do not require the individual to print their name along with a signature. In addition, the Cash Transmittal Form does not include a section for the preparer to enter a description stating the source of funds (i.e., culinary lunches, animal science grooming, etc.) <p><u>Recommendations:</u></p> <ol style="list-style-type: none"> 1. Review procedures to help ensure compliance with Board policies and regulations with using triplicate receipt books whenever employees are involved with receiving cash, particularly the customer service programs (e.g., culinary). The person receiving the cash should provide 1 copy to the payee, submit 1 copy along with the funds to the Business Office for deposit, and maintain 1 copy within their receipt book. 2. Strengthen controls related to receipts, particularly 	<p>A memo will be sent to all appropriate staff informing them that triplicate receipt books should be used when departments are receiving cash. In addition, <i>Regulation 4260R.1 Shop Sales and Services</i> will be reviewed in a training with appropriate staff in the CTE programs. Training will also be provided on how to use the triplicate receipt books.</p> <p>A memo will be sent to all ECAF Treasurers,</p>	<p>Lipponer</p> <p>Lipponer/DelVecchio</p>	<p>Completed</p> <p>Completed</p>

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<p>cash, since the collection of funds has a high level of inherent risk. We recommend that the extra classroom activities clubs and the customer service programs properly account for transactions by providing sufficient information to support the deposit amount (i.e., listing of the pre-numbered tickets or receipts, list of student names, etc.)</p>	<p>customer service programs and their supervisors informing them that all deposits have to have sufficient supporting documentation for deposits. In addition, the accountant in Business Services will review the deposits and if there is insufficient documentation, the accountant will follow up with the supervisor. Training on what is appropriate documentation will also be provided.</p>		
<p>3. Review procedures to help ensure compliance with Board policies and regulations with submitting the receipts timely by the extra classroom activities clubs and the customer service programs to the employees handling the deposits (i.e., central treasurers) or submitting the receipts to the Business Office (i.e., customer service clerks). The clubs, programs and cash receipts clerks should not be keeping funds on hand due to the potential risk of the monies being lost, misplaced or stolen.</p>	<p>Business Services will send out a memo reminding staff that deposits need to be made in a timely manner. Accounting staff will follow up with each building on a test basis to make sure the deposits are being sent over in an expeditious manner. Procedures related to timeliness of deposits will be reviewed at the staff training.</p>	Lipponer/DelVecchio	Completed
<p>4. Review procedures to help ensure that sealed bank bags and delivery bags verification forms are used for all receipts being transported from the programs and schools to the Business Office in compliance with <i>Board Procedure #4260P.1—Bank Deposit Bags</i>. Implementing the use of sealed bank bags will strengthen the receipts process by properly safeguarding the monies until the funds are received in the Business Office.</p>	<p>Business Services will send a memo to staff that reminds them to review procedures related to sealed bank bags and delivery bag verification forms. If a program does not have the bag or the form, it will be provided by Business Services. Procedures regarding the use of bank bags, bank bag verification and related sign-offs by appropriate employees will be reviewed at the staff training.</p>	Lipponer/Maddi	Completed
<p>5. Provide excel training for the cash receipts clerks and/or teachers to create and utilize an Excel file to list all of the Hold Harmless Agreement/Invoice</p>	<p>Business Services will send a memo informing staff handling cash for customer service programs that an excel sheet that lists all of the Hold Harmless</p>	Lipponer/DelVecchio	Completed

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<p>forms to properly support the amount of receipts from the program (e.g., culinary, animal science, cosmetology, etc.) This would facilitate the verification of the amount of funds received from the program and submitted to the Business Office, as well as, provide adequate supporting documentation.</p> <p>6. Set-up a safe or lockbox at all locations to properly safeguard the receipts until the funds are deposited in the bank or picked up by the ESBOCES courier.</p> <p>7. Consider revising the Cash Transmittal Form to include a line for the printed name in addition to the line for the signature of the employees transmitting and receiving the Cash Transmittal Form and to include section for the preparer to enter a description next to the name of the account within the revenue breakdown area. This area would include details of the source or receipts (e.g., culinary lunches next to Customer Service).</p> <p>Category: Staff Attendance Findings: Review of Board policies, ES BOCES procedures, collective bargaining agreements and employee contracts and interviews with ES BOCES employees related to staff attendance noted:</p> <ul style="list-style-type: none"> • There are procedures to require the instructional staff to sign-in and sign-out at each location daily. However, all other employees (e.g., administrators, clerical and custodial) are not required to sign-in or sign- 	<p>Agreement/Invoice forms should accompany deposits so there is proper documentation of cash receipts. Business Services will develop a uniform spreadsheet that all customer service programs can use and provide related training on how to use the spreadsheet.</p> <p>All locations that do not have a lockbox will purchase one to ensure receipts are safeguarded.</p> <p>Business Services will update the Cash Transmittal Form to include a line for the printed name in addition to the line for the signature of the employees transmitting and receiving the Cash Transmittal Forms and a section for the preparer to enter a description next to the name of the account within the revenue breakdown area.</p>	<p>Lipponer</p> <p>Lipponer/DelVecchio</p>	<p>Completed</p> <p>Completed</p>

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<p>out.</p> <ul style="list-style-type: none"> There were some good internal control procedures at some of the locations, which included highlighting the Daily Sign-In/Out Sheets to identify employees signing in late, reconciling the Daily Sign-In/Out Sheets to the WinCap and Aesop reports, and the maintenance of logs to track time taken off. <p>Selection of 2 pay periods for each school and department that administers staff attendance recordkeeping and comparison of attendance reporting to supporting documentation to entries into the financial system found:</p> <ul style="list-style-type: none"> There was 1 location (BAC) where there were 7 instances when the employees signed-in late on Wednesday, April 20, 2016. We were informed that these employees arrived on time, but signed-in after their arrival (e.g., after the first period), so there was no absence time that needed to be posted in WinCap. There were instances at 6 locations (BTC, BAC, BLC, IAC, MTC and WTC) where some employees did not enter their time or initials on the Daily Sign-In/Out Sheet, although the ESBOCES procedures require the employees to enter their time and initials when they sign-in and sign-out on the Daily Sign-In/Out Sheet. <p>Selection of 50 entries identified from the financial (or other) system noted:</p> <ul style="list-style-type: none"> The selected entries had proper documentation 			

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<p>attached to support the absence with the reason.</p> <p>Review the annual rollover of the attendance records from June 30, 2015 to July 1, 2015 found:</p> <ul style="list-style-type: none"> • There are standard procedures and WinCap documentation to facilitate the annual rollover process performed by the HR Department. • The annual rollover was accurate and in compliance with contractual obligations with no findings or exceptions noted during this review. <p>For any monthly award of benefit time, select one monthly accrual and test 25 entries to ensure compliance with contractual obligations noted:</p> <p>There were no exceptions noted during the testing of monthly accrual amounts for employees.</p> <p><u>Recommendations:</u></p> <ol style="list-style-type: none"> 1. Reinforce procedures to require all attendance clerks perform a full reconciliation of the Daily Sign- In/Out Sheets to the WinCap and Aesop reports to ensure they agree and review any discrepancies as well as confirming that the sign-in sheet is filled out correctly and accurately daily. 2. Consider establishing procedures to require all employees to sign-in and sign-out at each location daily. This would strengthen the attendance process, create consistent practices for all staff and provide additional documentation to enhance an attendance 	<p>For recommendations one (1), three (3) and four (4), best practices for supervision of attendance procedures will be reviewed, by the respective Administrative Council member, with each building level leader.</p> <p>For recommendation two (2), a change in timekeeping procedure is a subject to collective bargaining and is not being negotiated at this time. That being said, management has reviewed Agency attendance procedures and believes there are</p>	<p>Terri McSweeney</p> <p>Terri McSweeney</p>	<p>Completed</p> <p>Completed</p>

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<p>reconciliation process. The attendance clerks would be able to compare the Daily Sign-In/Out Sheets to the WinCap Daily Absence Report for all employees resulting in a complete reconciliation.</p> <p>3. Establish procedures at the BAC building to ensure that the required employees record their attendance on the Daily Sign-In/Out Sheets appropriately each day.</p> <p>4. Develop procedures at all locations to highlight the Daily Sign-In/Out Sheets at a designated time in the morning to identify any employees signing in late.</p> <p>Category: New Hires Findings: Review of Board policies, ES BOCES procedures, collective bargaining agreements/employee contracts and internal controls and interviews with employees found:</p> <ul style="list-style-type: none"> • The HR Department maintains hard copy files for the employee folders instead of utilizing an electronic software program (e.g. FileBound) to store documents electronically. • The HR Department prepares the personnel section of the Board agenda using Word documents that are submitted to the ES BOCES Clerk for preparing PDF files to send to the Board members. Many districts and BOCES' are now using programs or software products (e.g., BoardDocs, eBOARDsolutions, BoardPaq, etc.) to facilitate the preparation, 	<p>adequate controls in place to ensure staff attendance is accurate.</p>		

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<p>distribution and retention of Board agendas and minutes.</p> <p>Selection of 25 new hires during the period under review and testing for compliance noted:</p> <ul style="list-style-type: none"> There was 1 employee folder that was missing the Background Summary Checklist. Further discussion with the HR Department found that this Background Summary Checklist is not a required document to be included in the employee folder. We understand that ESBOCES will investigate this matter to determine if this should be included, since this provides details related to the background procedures performed by the clerks in the HR Department, or should be destroyed along with the Background Check Report due to privacy reasons. <p>Recommendations:</p> <ol style="list-style-type: none"> Consider using software (e.g., File Bound program) to maintain the employee records electronically to enhance operation efficiency. Investigate the use of a program or software product (e.g., BoardDocs, eBOARDsolutions, BoardPaq, etc.) to facilitate the preparation, distribution and retention of Board agendas and minutes. 	<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 after the completion of the implementation of the recruitment module.</p> <p>The department of Human Resources has implemented the WINCAP feature that produces the Board Personnel Agenda.</p>	<p>Sam Gergis</p> <p>Terri McSweeney</p>	<p>Est. completion: June 2022</p> <p>Completed</p>

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<p>3. Determine if the Background Summary Checklist should be included in the employee folder, since this provides details related to the background procedures performed by the clerks in the HR Department, or should be destroyed along with the Background Check Report due to privacy reasons.</p>	<p>Human resources and the business office are reviewing software solutions that automate the on-boarding (hiring) procedure, generate the personnel agenda and support electronic file retention. Currently the background summary sheet is used as evidence that internal manual procedures were followed. An automated system may eliminate the need for this documentation.</p>	<p>Sam Gergis</p>	<p>Est. completion: June 2022</p>

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<p>Reportable Conditions: None</p> <p>Category: Cash Activities <u>Findings:</u></p> <p>Interviews with appropriate personnel related to all types of cash transactions noted:</p> <ul style="list-style-type: none"> • There are standard procedures to prepare the monthly bank reconciliations timely and accurately. In addition, the Accountant has formal procedures related to key processes performed in this role. • ESBOCES has Board policies related to cash/investment management activities including Policy #1314 – Duties of the Treasurer, Policy #4210 – Investments and Policy #4222 – Financial Accountability. <p>Review of each cash account, general ledger activity reports, bank reconciliations and the Treasurer's Reports in the 2 months selected for testing found:</p> <ul style="list-style-type: none"> • There are procedures to have other employees in the Business Office review the bank reconciliations prepared by the Accountant and sign-off on the documentation. • ESBOCES practice related to outstanding checks is for the Senior Accountant to investigate and resolve items outstanding over 6 months. • There is opportunity for improvement related to the Treasurer's Report, since we found that the current version contains a significant amount of detail rather than providing more of a summary in a clear and concise format that would be easier for the Board to follow and review. • The bank reconciliations are prepared by the Accountant and then reviewed by Senior Accountant. This process could be improved by having the Treasurer review and approve the bank reconciliations instead of the Senior Accountant. The Principal Accountant and School Finance Manager review the bank reconciliations as part of their monthly and 			

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<p>quarterly general ledger reviews.</p> <ul style="list-style-type: none"> • The bank reconciliations were inappropriately labeled "Treasurer Reports" instead of being properly titled as "Bank Reconciliations". In addition, ESBOCES should ensure that there is adequate detailed support to clearly match the amounts listed on the bank reconciliations. <p>Comparison of the balances in the treasurer's report for the 2 months selected to the general ledger noted:</p> <ul style="list-style-type: none"> • The Payroll and General Fund Checking account balances reported on the Treasurer's Report do not agree to the bank reconciliations and the cash accounts in the general ledger for the month when there are adjustments for unreleased accounts payable checks and timing of payroll transactions. We note that ESBOCES' practice related to Treasurer Reporting presentations has been to add back checks that have not been released to the cash balances and to reconcile these amounts to the general ledger. We found that these revised balances on the Treasurer's Report resulted in different amounts per the bank reconciliations and the cash accounts in the financial records; however, it should be noted that these were temporary timing differences. Also, the Treasurer's Report includes transfers between accounts, but the preferred format is to include the receipts and disbursements totals to reflect only those with outside entities and to show internal transfers in the aggregate amount for simplicity purposes. <p>Review of investment activity to determine if ESBOCES is in compliance with the policy and to determine if ESBOCES is maximizing the amount of interest earned on cash balances found:</p> <ul style="list-style-type: none"> • ESBOCES has Board Policy #4210 – Investments in place as required by Education Law, General Municipal Law and Local Finance Law. In accordance with this policy: <ul style="list-style-type: none"> – There are objectives based on specific criteria as noted in the policy and the authority to deposit and invest funds in eligible investments as listed in the policy. 			

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<ul style="list-style-type: none"> • The investment bank statements appear appropriate with no unusual or unsupported activities. Further review noted that the Accountant properly includes these accounts in the monthly Treasurer's Report. • Review of the general ledger activity related to the investment accounts found that the Accountant posted the receipts and transfers to the operating accounts accurately and timely. <p>Review of security access controls in the WinCap financial system relative to the cash accounts to help ensure appropriate levels of access are provided noted:</p> <ul style="list-style-type: none"> • Review of the WinCap system administrator's user permissions found that the setup is appropriate. We noted that only the system administrators have permissions to add user accounts. The system administrators are employees in the Technology Integration Department. • The Business Office works with the Human Resources Department (HR) to determine if any new hires need access to WinCap and if so, determines the permissions to be granted based on their job duties. There are formal procedures and standard forms related to the submission of user account changes to the system administrator in the Technology Integration Department. • The WinCap user accounts that have access to cash accounts and cash related activities were appropriate based on the user's role at ESBOCES. <p><u>Recommendations:</u></p> <p>We recommend ESBOCES consider implementing the following items to further improve internal controls and operational efficiencies related to cash activities:</p> <ol style="list-style-type: none"> 1. Revise the Treasurer's Report that is provided to the Board by creating a simplified version resulting in a format that is more clear and concise to read than the current version. This would include listing the receipts and disbursements totals to reflect only those with outside entities and to show the internal transfers in the aggregate amount. We provided a sample report based on revisions to ESBOCES Treasurer's Report from November 2018. 	<p>Business Services will revise the Treasurers' Report using the sample provided by the auditor.</p>	<p>Lipponer</p>	<p>Completed</p>

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<p>2. Revise the reporting methodology to ensure that the Treasurer's Report submitted to the Board agrees to the monthly bank reconciliations and the cash accounts in the general ledger; instead of adjusting the Treasurer's Report for miscellaneous timing differences. This would provide a more consistent Treasurer's Report that correctly reflects ESBOCES financial records.</p>	<p>Business Office will change the methodology to have the Treasurer's Report and general ledger. The timing differences will be footnoted.</p>	Lipponer	Completed
<p>3. Streamline the bank reconciliation process so that the bank reconciliations prepared by the Accountant are reviewed and signed by the Treasurer. This would reduce the number of Business Office employees reviewing the bank reconciliations.</p>	<p>Business Services will implement this process.</p>	Lipponer	Completed
<p>4. Rename all bank reconciliations as "Bank Reconciliations" instead of "Treasurer Reports" and ensure there is adequate detailed support that clearly matches the amounts listed on the bank reconciliations.</p>	<p>Business Services will update the work paper and ensure that there is detailed documentation for reconciling items.</p>	Lipponer	Completed
<p>5. Develop procedures to assign the process of reviewing and addressing outstanding checks of 6 months or older to the Treasurer.</p>	<p>Documented procedures will be developed for outstanding checks.</p>	Lipponer	Completed
<p>Category: Medicare Reimbursement Activities</p> <p><u>Findings:</u></p> <p>Review of Board policies and ESBOCES procedures and interviews with appropriate personnel related to Medicare reimbursements noted:</p> <ul style="list-style-type: none"> • ESBOCES has standard procedures related to the handling, filing and processing of payments for Medicare reimbursements paid to retirees or their surviving spouses. • There are approximately 1,400 individuals who receive Medicare reimbursements each quarter and approximately 500 individuals who receive IRMAA payments annually during May that covers the previous calendar year (e.g., May 2019 payments were based on the 2018 calendar year). • The Benefits Department prepares a detailed reconciliation during each quarterly Medicare reimbursement that includes a comparison of the WinCap Enrollment Listing Report, which is downloaded into Excel and 			

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<p>compared to the Benefits Department's Excel file listing of all enrollees, exclusive of the IRMAA group. There is a separate IRMAA listing for those individuals. The Benefits Department sends a memo in January each year to all Medicare recipients to inform the retirees about IRMAA. The retiree needs to reply no later than April 1st with the proper supporting documentation (i.e., Form SSA-1099 Social Security Benefit Statement). One Benefits Clerk enters all of the updates to the starting list based on the prior ending list and the other Benefits Clerk reviews to ensure the accuracy of the WinCap Enrollee Listing. After completing this review, the Benefits Department sets up a schedule and warrant to process the Medicare reimbursements.</p> <ul style="list-style-type: none"> • The HR Department provides the yearly Medicare reimbursement rates to the Benefits Department. During the past 2 years, the rate increases have been based on COLA for certain enrollees as per their payments towards Medicare Part B. The Payroll Administrator enters the rates into WinCap and the Benefits Department enters the rates into the Excel listing of enrollees. • The Claims Auditor has recently started a practice to randomly select 25 enrollees who are included in the warrant listing all of the Medicare reimbursements and requests the supporting documentation from the Benefits Department. This is now part of the Claims Auditor's process related to the quarterly review of the Medicare reimbursements. <p>Comparison of amounts paid to individuals for the past 3 reimbursements and review of the supporting documentation for changes in individuals and amounts paid found:</p> <ul style="list-style-type: none"> • There were no errors or exceptions as the amounts paid to individuals agreed to the supporting documentation. <p>Selection of 50 payments from the most recent reimbursement and review of the supporting documentation for the amounts paid noted:</p> <ul style="list-style-type: none"> • The Benefits Department processes Medicare Part B reimbursements quarterly and an additional IRMAA reimbursement for retirees related to each calendar year. This results in a significant amount of administrative work including maintaining more records (e.g., Social Security Administration Benefits Letters), performing 5 reconciliations annually and 			

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<p>processing over 6,000 payments. There is an extensive amount of work to track, monitor and reconcile these activities each quarter.</p> <ul style="list-style-type: none"> • There were over 50% of the reimbursements paid to retirees in the form of checks compared to ACH payments. • There were instances when the spouse information was included in the employee fields of the WinCap financial system and other instances when the spouse information was not included in the employee fields. <p><u>Recommendations:</u></p> <p>We recommend ESBOCES consider implementing the following items to further improve internal controls and operational efficiencies related to Medicare reimbursement activities:</p> <ol style="list-style-type: none"> 1. Consider processing Medicare Part B reimbursements annually after the retirees have provided their Form SSA-1099 Social Security Benefit Statement showing the amount of premiums deducted from the retiree's benefits for the calendar year. This would significantly reduce the administrative work that currently exists with processing quarterly reimbursements and a separate IRMAA reimbursement. The Benefits Department should continue to monitor this list of retirees quarterly or monthly based on changes from the HR Department to facilitate the annual reimbursement by having an eligibility list at the time the annual payment would be processed in March or April. The process would be simplified by using the Medicare Part B deductions amount from the Form SSA-1099 Social Security Benefit Statement to support the reimbursement amount. The number of payments would be reduced from over 6,100 covering 5 warrants to approximately 1,400 on 1 warrant. Since ESBOCES has already processed the reimbursements for the 1st and 2nd quarter of 2019, we recommend processing a final 2019 payment during March or April 2020 for the remainder of the 2019 calendar year based on the Form SSA-1099 Social Security Benefit Statement to support the reimbursement amount. We suggest moving to an annual process for the 2020 year to be paid in March or April 2021. 	<p>Due to the covid-19 pandemic, the implementation timeline has been reevaluated. Management will assess a plan to implement in three years; by 2023. Communication to retirees will start as soon as possible of the transition to an annual payment beginning Spring of 2023.</p>	<p>Lipponer</p>	<p>Estimated Completion June 2023</p>

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<p>2. Determine ways to increase the number of Medicare reimbursements paid to retirees in the form of ACH payments to reduce the volume of checks, which represent over 50% of these transactions.</p> <p>3. Develop consistent practices to include the spouse information in the employee fields of the WinCap financial system</p> <p>Category: Gramm-Leach-Bliley Act Findings:</p> <p>Review of policies and procedures related to access to student data noted:</p> <ul style="list-style-type: none"> ESBOCES has formal procedures and Board policies including Administrative Computer Network Security and Disaster Recovery - #4590 to properly restrict access to student data and to safeguard this sensitive data. This includes assigning only a limited number of designated employees to have access to student data based on their job duties. Also, the student data is maintained in programs that are restricted via user accounts and permissions. There are protocols in place that address NYSED Education Law (EL) -2D related to the protection of Personally Identifiable Information (PII). ESBOCES requires all vendors each year to provide an attestation that any PII is appropriately protected as per EL-2D. This covers contracts with software providers including the student registration system (Xenegrade) and the student management system (NexGen) where the vendor must provide this information within the contract documentation. <p>Interviews with ESBOCES staff to determine applications which utilize student related data found:</p> <ul style="list-style-type: none"> The interviews with the administrators and employees noted that Xenegrade utilizes student related data for the Adult Education programs. The Financial Aid Office within the Career, Technical and Adult Education Division uses Xenegrade to facilitate the adult education registrations. One of the criteria regarding the GLBA is that the organization is considered a financial institution that maintains student related data. Since ESBOCES 	<p>ESBOCES will send a notice to retirees to recommend using ACH payments.</p> <p>HR and Business Services will come up with a process.</p>	<p>Lipponer</p> <p>Lipponer/ Gergis</p>	<p>Completed</p> <p>Estimated Completion June 2021</p>

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<p>has Title IV funding, particularly with the nursing programs, the organization could be deemed a financial institution subject to the GLBA.</p> <ul style="list-style-type: none"> • There are formal procedures including standard forms regarding changes to user accounts and permissions associated with the financial system (WinCap), NexGen and ESBOCES network. However, we found that there are informal procedures (emails) related to system administration user accounts and permissions related to the Xenegrade used by the Adult Education program. • ESBOCES is in the process of developing the Information Security Program - Risk Assessment Plan, Security Risk Assessment and Risk Assessment Summary document that will create formal, written procedures as required per the GLBA. The goal is to complete this extensive initiative during the first quarter of the 2019-20 year. • ESBOCES personnel is aware of the GLBA's three sections: (1) Financial Privacy Rule, (2) Safeguards Rule and (3) Pretexting provisions and plans to ensure that the proper protocols are in place to address each of these sections when the GLBA requirements are finalized, presumably in the near future. <p>Performing tests and reconciliations of data noted:</p> <ul style="list-style-type: none"> • The significant control activities are functioning as designed related to student data. <p><u>Recommendations:</u></p> <p>We recommend ESBOCES consider implementing the following items to further improve internal controls and operational efficiencies related to compliance with the GLBA:</p> <ol style="list-style-type: none"> 1. Establish formal procedures and a standard form regarding changes to user accounts and permissions related to Xenegrade, similar to the process for user accounts and permissions associated with WinCap, NexGen and ESBOCES network access. 2. Complete the Information Security Program -Risk Assessment Plan, 	<p>Adult Education will establish procedures.</p>	<p>Arnold</p>	<p>Completed</p>

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Security Risk Assessment and Risk Assessment Summary to create formal, written procedures as required per GLBA.	Adult Education will complete.	Arnold	Estimated Completion June 2021