

STATE OF FLORIDA AUDITOR GENERAL

Operational Audit

Report No. 2022-028
October 2021

**CITRUS COUNTY
DISTRICT SCHOOL BOARD**



Sherrill F. Norman, CPA
Auditor General

Board Members and Superintendent

During the 2020-21 fiscal year, Sandra Himmel served as Superintendent of the Citrus County Schools and the following individuals served as School Board Members:

	<u>District No.</u>
Thomas Kennedy	1
Virginia G. Bryant, Vice Chair from 11-17-20	2
Douglas A. Dodd	3
Sandy Counts, Chair through 11-16-20	4
Linda B. Powers, Chair from 11-17-20, Vice Chair through 11-16-20	5

The audit was supervised by Anna A. McCormick, CPA.

Please address inquiries regarding this report to Edward A. Waller, CPA, Audit Manager, by e-mail at tedwaller@aud.state.fl.us or by telephone at (850) 412-2887.

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CITRUS COUNTY DISTRICT SCHOOL BOARD

SUMMARY

This operational audit of the Citrus County School District (District) focused on selected District processes and administrative activities and included a follow-up on findings noted in our report No. 2019-069. Our operational audit disclosed the following:

Finding 1: Some unnecessary information technology (IT) user access privileges to sensitive personal information of students continued to exist.

Finding 2: Some inappropriate or unnecessary IT access privileges existed that increased the risk for unauthorized disclosure, modification, or destruction of District data and IT resources to occur.

BACKGROUND

The Citrus County School District (District) is part of the State system of public education under the general direction of the Florida Department of Education and is governed by State law and State Board of Education rules. Geographic boundaries of the District correspond with those of Citrus County. The governing body of the District is the Citrus County District School Board (Board), which is composed of five elected members. The elected Superintendent of Schools is the Executive Officer of the Board. During the 2020-21 fiscal year, the District operated 21 elementary, middle, high, and specialized schools; sponsored 1 charter school; and reported 15,243 unweighted full-time equivalent students.

FINDINGS AND RECOMMENDATIONS

Finding 1: Information Technology User Access Privileges to Sensitive Personal Student Information

The Legislature has recognized in State law¹ that social security numbers (SSNs) can be used to acquire sensitive personal information, the release of which could result in fraud against individuals or cause other financial or personal harm. Therefore, public entities are required to provide extra care in maintaining the confidential status of such information. Effective controls restrict individuals from accessing information unnecessary for their assigned duties and provide for documented, periodic evaluations of information technology (IT) user access privileges to help prevent individuals from accessing sensitive personal information inconsistent with their duties. Board policies² authorize designated District school personnel access to student records to perform administrative, supervisory, or instructional responsibilities that should serve a legitimate educational purpose in accordance with applicable requirements in State and Federal laws and State Board of Education rules, and District employees are required to certify that they will comply with these requirements.

¹ Section 119.071(5)(a), Florida Statutes.

² Board Policy 5.70, *Student Records*.

The District student information system (SIS) provides for student records data processing and the District maintains current and former student information, including SSNs, in the District SIS. Student SSNs are included in the student records maintained within the District SIS to, for example, register newly enrolled students and transmit that information to the FDOE through a secure-file procedure and provide student transcripts to colleges, universities, and potential employers based on authorized requests.

District personnel indicated that each location supervisor is responsible for requesting the appropriate SIS access privileges for their staff, and the Student Systems Application Support Specialist reviews the completed request forms and grants access in the SIS. District personnel also indicated that school-based employees only have access to information for current students enrolled in their school and that the SIS distinguishes information of current students from that of former students and only allows access to the information of current students who have not enrolled in another school in the District. District personnel indicated that an Information Services Department staff member performs monthly evaluations of access privileges to the sensitive personal information of students.

As of May 2021, the District SIS contained SSNs for 13,931 current³ District students and 55 District employees had IT user access privileges to that information. As part of our audit, we inquired of District personnel and examined District records supporting the IT user access privileges for 21 selected employees who had access to student SSNs. We found that 4 employees, including a Technology Support Specialist, 2 principal secretaries, and a bookkeeper, did not have a demonstrated need for continuous access to the information. Subsequent to our inquiry, the District removed the access privileges for the 4 employees. During the District's monthly access privilege evaluation in May 2021, District personnel removed unnecessary access privileges to student SSNs for 8 additional District employees with similar job duties.

According to District personnel, the other 43 employees needed continuous access to student SSNs to enroll and withdraw students year-round. Our examination of District records confirmed that these 43 users, including data secretaries, school registrars, and other personnel who served as back-ups to these positions, required the access.

The existence of unnecessary IT user access privileges increases the risk of unauthorized disclosure of sensitive personal information and the possibility that such information may be used to commit a fraud against current District students. A similar finding was noted in our report No. 2019-069.

Recommendation: To ensure sensitive personal information of students is properly safeguarded, the District should promptly remove any inappropriate or unnecessary access privileges detected.

Finding 2: Information Technology User Access Privileges to the Business Application

Access controls are intended to protect data and IT resources from unauthorized disclosure, modification, or destruction. Effective access controls provide employees access to IT resources based on a demonstrated need to view, add, change, or delete data and restrict employees from performing

³ The District SIS also contained SSNs for 117,793 former District students and, according to District records, no one had access to that information. To facilitate requests for student transcripts to colleges, universities, and potential employers, the security administrator grants access to that information on an as-needed basis.

incompatible functions or functions outside their areas of responsibilities. Periodic evaluations of assigned IT access privileges are necessary to ensure that employees can only access those IT resources that are necessary to perform their assigned job responsibilities. District personnel indicated that a documented evaluation of IT user access privileges is completed semi-annually to detect and remove any unnecessary and inappropriate access privileges.

As part of our audit, we obtained a list of the 258 employees with IT access privileges to the District business application, including the finance and HR modules. To determine whether the IT user access privileges were consistent with employee job responsibilities, we requested for examination District records supporting the access privileges of 30 selected employees and found that the access privileges and job responsibilities were incompatible for:

- An accounting analyst in the Finance Department who could add and update vendor information and create invoices as a back-up for the Internal Accounts Manager and also had unnecessary access privileges that allowed the analyst to process vendor payments.
- A personnel analyst who had the ability to add and update employee information in the HR modules and also had unnecessary access privileges that allowed the analyst to process payroll payments.

Subsequent to our inquiries, in May 2021 District personnel removed incompatible access privileges for these two employees.

While District controls (e.g., budget monitoring and payroll and expenditure processing controls to independently review error reports and prevent duplicate payments) mitigate some risks associated with these access control deficiencies, inappropriate access privileges increase the risk that unauthorized disclosure, modification, or destruction of District data may occur without timely detection.

Recommendation: The District should continue efforts to ensure that access privileges are limited to those necessary for employees to perform their assigned duties. Such efforts should include enhanced periodic evaluations of IT user access privileges to ensure those privileges restrict employees from performing incompatible functions or functions outside their areas of responsibilities.

PRIOR AUDIT FOLLOW-UP

The District had taken corrective actions for findings included in our report No. 2019-069 except that Finding 1 was also noted in that report as Finding 4.

OBJECTIVES, SCOPE, AND METHODOLOGY

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from April 2021 through July 2021 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions

based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This operational audit focused on selected District processes and administrative activities, including, but not limited to, District information technology resources and related controls, school safety, fiscal transparency, and compensation. For those areas, our audit objectives were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering assigned responsibilities in accordance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed in operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, reliability of records and reports, and safeguarding of assets, and identify weaknesses in those controls.
- Determine whether management had taken corrective actions for findings included in our report No. 2019-069.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

This audit was designed to identify, for those areas included within the scope of the audit, weaknesses in management's internal controls significant to our audit objectives; instances of noncompliance with applicable laws, rules, regulations, contracts, grant agreements, and other guidelines; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; identifying and evaluating internal controls significant to our audit objectives; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included transactions, as well as events and conditions, occurring during the 2020-21 fiscal year audit period, and selected District actions taken prior and subsequent thereto. Unless otherwise indicated in this report, these records and transactions were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature does not include a review of all records and actions of management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, waste, abuse, or inefficiency.

In conducting our audit, we:

- Reviewed applicable laws, rules, Board policies, District procedures, and other guidelines, and interviewed District personnel to obtain an understanding of applicable processes and administrative activities.
- Reviewed Board information technology (IT) policies and District procedures to determine whether the policies and procedures addressed certain important IT control functions, such as security, systems development and maintenance, network configuration management, system backups, and disaster recovery.
- Evaluated District procedures for maintaining and reviewing employee access to IT data and resources. We examined selected access privileges to District enterprise resource planning system finance and human resources (HR) applications to determine the appropriateness and necessity of the access based on employee job duties and user account functions and whether the access prevented the performance of incompatible duties. Specifically, from the population of 258 employees who had IT user access privileges to the finance and HR applications, we reviewed the appropriateness of access privileges granted to 30 selected employees. We also examined the administrator account access privileges granted and procedures for oversight of administrative accounts for the network and applications to determine whether these accounts had been appropriately assigned and managed.
- Evaluated District procedures for protecting the sensitive personal information of students, including social security numbers. Specifically, from the population of 55 employees who had access to sensitive personal student information, we examined the access privileges of 21 selected employees to evaluate the appropriateness and necessity of the access privileges based on the employee's assigned job responsibilities.
- Evaluated District procedures to prohibit former employee access to electronic data files. Specifically, we examined District records supporting user access privileges for 27 of the 207 employees who separated from District employment during period July 1, 2020, through June 8, 2021, to determine whether the access privileges had been timely deactivated.
- Determined whether a comprehensive IT disaster recovery plan was in place, designed properly, operating effectively, and had been recently tested.
- Determined whether a comprehensive IT risk assessment had been established to document the District's risk management and assessment processes and security controls intended to protect the confidentiality, integrity, and availability of data and IT resources.
- Examined selected operating system, database, network, and application security settings to determine whether authentication controls were configured and enforced in accordance with IT best practices.
- Evaluated the District data center's physical access controls to determine whether vulnerabilities existed.
- Determined whether a fire suppression system had been installed in the District data center.
- From the population of \$2.4 million total workforce education program funds expenditures for the period July 1, 2020, through April 30, 2021, examined District records supporting 30 selected expenditures totaling \$663,935 to determine whether the District used the funds for authorized purposes (i.e., not used to support K-12 programs or District K-12 administrative costs).

- From the population of 132 industry certifications eligible for the 2020-21 fiscal year performance funding, examined 40 selected certifications to determine whether the District maintained documentation for student attainment of the industry certifications.
- From the population of 6,347 contact hours reported for 79 adult general education instructional students during the Fall 2020 Semester, examined District records supporting 1,359 reported contact hours for 30 selected students to determine whether the District reported the instructional contact hours in accordance with State Board of Education (SBE) Rule 6A-10.0381, Florida Administrative Code.
- Examined the District Web site to determine whether the 2020-21 fiscal year proposed, tentative, and official budgets were prominently posted pursuant to Section 1011.035(2), Florida Statutes. In addition, we determined whether the Web site contained the required graphical representations, for each public school within the District and for the District, of summary financial efficiency data and fiscal trend information for the previous 3 years, and a link to the Web-based fiscal transparency tool developed by the Florida Department of Education (FDOE).
- From the population of 48 bank reconciliations for the audit period, selected and examined 12 reconciliations and supporting documentation to determine whether the District timely performed the reconciliations.
- Determined whether District deposits were secured in a qualified public depository, unless exempted by law, as required by Section 280.03, Florida Statutes.
- Examined District records supporting teacher salary increase allocation payments totaling \$2.5 million to 1,107 teachers and instructional personnel and the required reports submitted to the FDOE (salary distribution plan and expenditure report) to determine whether the District submitted applicable reports to the FDOE and used the funds in compliance with Section 1011.62(18), Florida Statutes.
- Evaluated the effectiveness of Board policies and District procedures for ethical conduct of instructional personnel and school administrators, including reporting responsibilities related to employee misconduct which affects the health, safety, or welfare of a student, to determine the sufficiency of those policies and procedures to ensure compliance with Section 1001.42(6), Florida Statutes.
- Examined District records to determine whether the Board had adopted appropriate school safety policies and the District implemented procedures to ensure the health, safety, and welfare of students and compliance with Sections 1006.07, 1006.12, 1006.13, 1011.62(15) and (16), and 1012.584, Florida Statutes.
- Examined District records to determine whether the Board had adopted appropriate mental health awareness policies and the District implemented procedures to promote the health, safety, and welfare of students and ensure compliance with Sections 1011.62(16) and 1012.584, Florida Statutes, and SBE Rule 6A-1.094124, Florida Administrative Code.
- Evaluated the sufficiency of District procedures to determine whether the District charter school was required to be subjected to an expedited review pursuant to Section 1002.345, Florida Statutes.
- Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
- Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
- Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

AUTHORITY

Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each school district on a periodic basis. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.

A handwritten signature in blue ink that reads "Sherrill F. Norman". The signature is written in a cursive style with a large initial 'S'.

Sherrill F. Norman, CPA
Auditor General

MANAGEMENT'S RESPONSE



SANDRA "SAM" HIMMEL – SUPERINTENDENT OF SCHOOLS

*"Where Learning is the Expectation
And Caring is a Commitment"*

THOMAS KENNEDY
DISTRICT 1

VIRGINIA BRYANT
DISTRICT 2

DOUGLAS A. DODD
DISTRICT 3

SANDRA COUNTS
DISTRICT 4

LINDA B. POWERS
DISTRICT 5

October 14, 2021

Sherrill F Norman, Auditor General
Claude Denson Pepper Building, Suite G74
111 West Madison Street
Tallahassee, Florida 32399-1450

Dear Ms. Norman,

In connection with your operational audit, we have reviewed the preliminary and tentative findings and recommendations for the fiscal year ended June 30, 2021.

Our response to the audit findings and corrective action proposals to the preliminary and tentative findings for the Operation Audit of the Citrus County School District for the Year ended June 30, 2021.

Finding 1: Information Technology User Access Privileges to Sensitive Personal Student Information

To ensure sensitive personal information of students is properly safeguarded, the District should promptly remove any inappropriate or unnecessary access privileges detected.

CCSB Response

The IT department will contact the SIS provider to request that the number of panels displaying the SSN are reduced to a minimum while allowing the various roles to retrieve necessary information. The current process for SIS access will be amended to require the District MIS Director's approval for access to areas with the social security number. Monitoring social security access monthly and the revoking of temporary or unnecessary access will continue. Additionally, District MIT Director and the Student Systems Application Support Specialist will meet monthly to conduct the review.

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Equal Opportunity Employer

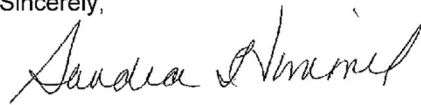
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The District should continue efforts to ensure that access privileges are limited to those necessary for employees to perform their assigned duties. Such efforts should include enhanced periodic evaluations of IT user access privileges to ensure those privileges restrict employees from performing incompatible functions or functions outside their areas of responsibilities.

CCSB Response

Both positions reviewed were in the process of a transition and the access privileges were necessary for the personnel to complete their current responsibilities while learning their new responsibilities, at the time of the audit inquiry. The district is constantly reviewing access privileges necessary for employees to perform their duties and will continue to do so on a regular basis.

Sincerely,



Sandra Himmel
Superintendent

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