

LONGWOOD CENTRAL SCHOOLS

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Corrective Action Plan Response to the Agreed-Upon Procedures Report Dated March 2015

IT ENVIRONMENT

POLICIES & PROCEDURES:

Recommendation #1: We noted the District is in the process of developing a policy that addresses the identification and restriction of data that is considered personal, private or sensitive in emails, printed reports, or other forms of communication. Such a policy defines what data is considered personal, private, and sensitive information (PPSI); explains the entity's reasons for collecting PPSI; and describes specific procedures for the use, access to, storage, and disposal of PPSI involved in normal business activities. It should be noted that the District requires vendors to provide a vendor privacy statement to ensure that they are keeping any District data secure and are not using the data inappropriately. We commend the District's efforts for their proactive measures to ensure that District data is properly safeguarded. We recommend that such a policy be adopted and implemented to further strengthen the internal control environment.

Districts Response: The District has consulted with counsel regarding this recommendation and they have advised us that there are no guidance regulations at this time. As soon as regulations are issued, the district will revisit this recommendation with counsel.

ACCESS CONTROLS

Recommendation #2: We noted that there may be times when access permissions to Finance Manager, IEP Direct, and Power School are not updated should an employee transfer within the District. Based on our discussions, the Director of IT Services proposed modifying the change of request form to require Human Resources to confirm access to these applications should an employee change positions in the District. We recommend that this form be revised to ensure that any changes in an employee's job responsibilities require a review of access to Finance Manager, IEP Direct, and Power School.

District Response: The Human Resources Department and Information Technology are conducting meetings to review the Permissions and Access form. Part of this review entails adding a section that will remove old permission/access, as well as add new permissions/access. A software forms package is being reviewed for possible use that will automate the process.

