

MAMMOTH-SAN MANUEL UNIFIED SCHOOL DISTRICT

POST OFFICE BOX 406
SAN MANUEL, ARIZONA 85631
(520) 385-2336
FAX (520) 385-2621

SUPERINTENDENT
Julie Dale-Scott

GOVERNING BOARD
Terry Newman, President
David Aronson, Vice President
Michael Carnes
Malinda LeGrand
Louis Madrid

December 19, 2024

Lisa S. Parke, CPA
Audit & Assurance Partner
Walker & Armstrong
1850 N. Central Avenue, Suite 400
Phoenix, AZ 85004

Dear Ms. Parke:

Please accept Mammoth-San Manuel Unified School District's response to the performance audit that has recently been completed. The administration and governing board accept the findings, have already implemented some recommendations and will continue to diligently work to implement the remaining recommendations.

The District would like to share our appreciation to the audit team for their professionalism and patience while conducting the audit. Thank you for working with us in such a positive way that helped us grow through this process.

Sincerely,



Julie Dale-Scott
Superintendent

Finding 1: District lacked important internal controls in some areas, potentially increasing the risk to student safety and District property.

District Response: The finding is agreed to.

Recommendation 1: Review personnel files for employees who are required to have background checks to ensure that all required checks have been completed and documented.

District Response: The audit recommendation will be implemented.

Recommendation 2: Follow its process to complete an onboarding checklist for all newly hired employees.

District Response: The audit recommendation will be implemented.

Recommendation 3: Develop and implement policies and procedures for training employees on required hiring documentation and document-retention time frames to comply with federal law and the USFR.

District Response: The audit recommendation will be implemented.

Recommendation 4: Retain documentation in personnel files in accordance with applicable document-retention schedules.

District Response: The audit recommendation will be implemented.

Recommendation 5: Develop and implement policies and procedures for monitoring and reviewing usage logs for all District vehicles that includes ensuring vehicles are only used for an authorized purpose.

District Response: The audit recommendation will be implemented.

Finding 2: District's excessive access to its sensitive computerized data and other IT deficiencies increased the risk of unauthorized access to its network and sensitive information, errors, fraud, and data loss.

District Response: The finding is agreed to.

Recommendation 6: Protect its sensitive computerized data by limiting users' access to its accounting system and student information system to only those functions needed to perform their job duties, including removing the outside consultant's administrator-level access and business office employees' full access.

District Response: The audit recommendation will be implemented.

Response explanation: The District is working on implementing this recommendation and have removed access for the consultant whose account was identified in the audit.

Recommendation 7: Develop and implement written policies and procedures to assign and periodically review accounting system access for employee accounts to ensure they have access to only those accounting system functions needed to perform their job duties. If separation of duties is not feasible due to a limited number of personnel, the District should implement other controls, such as a process for a supervisor to regularly review system logs, balancing reports, and other relevant indicators, as required by the USFR.

District Response: The audit recommendation will be implemented.

Recommendation 8: Immediately disable or remove all unnecessary user accounts in its network and implement a review process to ensure network access is removed immediately when an employee or vendor relationship is terminated.

District Response: The audit recommendation will be implemented.

Recommendation 9: Develop and implement an IT contingency plan that meets USFR requirements and credible industry standards, test the plan at least annually to identify and remedy deficiencies, and document the test results.

District Response: The audit recommendation will be implemented.

Response explanation: The district added a two-factor authentication (2FA) service that adds an extra layer of security in September 2024.