



Governing Board
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Benson Unified School District #9

360 S. Patagonia Street • Benson, AZ 85602 • Phone: 520-720-6700

Superintendent
Micah Mortensen

April 23, 2024

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

Dear Ms. Parke:

Please accept Benson 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,

Micah Mortensen
Superintendent

Finding 1: The District's errors on annual transportation reports resulted in it being overfunded by \$343,000 for fiscal year 2024

Recommendation 1: Annually submit accurate and complete required transportation reporting to ADE.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district will submit accurate and complete reporting to ADE

Recommendation 2: Develop and implement procedures to ensure transportation information, including eligible students transported and miles driven, is properly reported to the ADE for state funding purposes. The procedures should include a secondary review process before submitting transportation reporting to ADE.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district has updated procedures to have a secondary review process before the submittal of the transportation reports to ADE

Recommendation 3: Develop and implement procedures to review transportation funding amounts received and compare the amounts to budgeted amounts.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district has updated procedures to review and compare transportation funding amounts received to budgeted amounts

Recommendation 4: Work with ADE regarding needed corrections to its transportation funding reports until all transportation reporting and funding errors are fully corrected.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Finding 2: District did not comply with important cash handling requirements, putting the District at an increased risk of errors and fraud

Recommendation 5: Ensure that its newly established cash handling policy includes all internal controls necessary to properly safeguard student activity funds in compliance with USFR requirements for cash handling.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district has implemented and updated procedures regarding cash handling that comply with USFR requirements

Recommendation 6: Develop and implement processes to monitor and enforce staff compliance with its cash handling policies, such as performing regular reviews of cash receipt and deposit documentation and taking action when it identifies staff noncompliance with cash handling policies.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district has implemented regular reviews of cash receipt and deposit documentation and identifies staff noncompliance with cash handling policies.

Finding 3: 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

Recommendation 7: Implement and enforce strong password requirements that align with credible industry standards to decrease the risk of unauthorized persons gaining access to sensitive District information and disrupting operations.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district has implemented and enforces strong password requirements

Recommendation 8: Develop and implement policies and procedures to regularly review the District's password standards against credible industry standards at least annually.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 9: 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 business office employees' administrator-level access.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 10: 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 USFR.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 11: Develop and implement written policies and procedures to initiate automatic device locks after a defined period of inactivity.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 12: Protect sensitive computerized systems and data by evaluating and implementing security measures, such as encryption, for its DNS servers.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 13: Develop and implement an IT contingency plan that meets USFR requirements and credible industry standards and test the plan at least annually to identify and remedy deficiencies and document the test results.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation

Recommendation 14: Develop and implement IT security policies and procedures in alignment with USFR requirements, and ensure they are consistently communicated to and implemented by staff to address any identified deficiencies and discrepancies in current operations.

District Response: The finding is agreed to, and the audit recommendation will be implemented.

Response explanation: The district is in the process of implementing this recommendation