

Office of Internal Compliance

Audit Committee Meeting

April 18, 2019

2:00 PM

Presented by:

Connie Brown, Executive Director – Internal Compliance

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district where students love to
learn, educators inspire,
families engage and the
community trusts the system.



Content

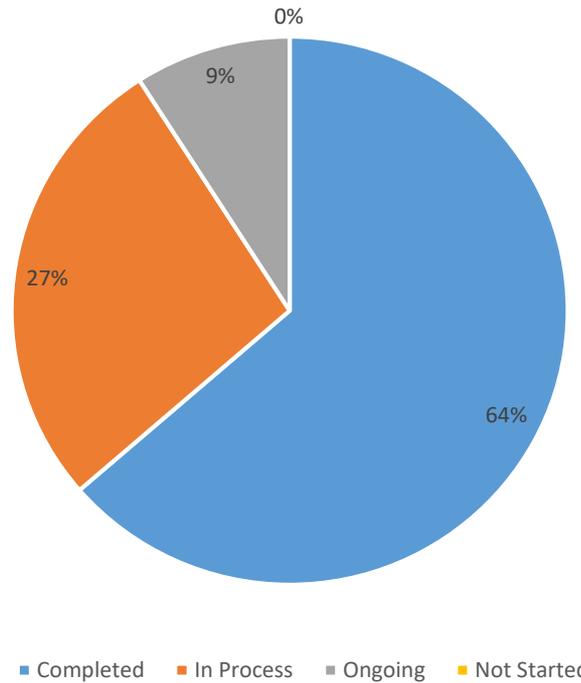
- OIC Update
 - Audit Plan – SY2019 Update
 - Audit Report/Recommendation Update
 - Infinite Campus Access Review
 - IT General Controls Update
 - Executive Session

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SY2019 Audit Plan – Status Update

SY2019 Audit Plan Update
04/18/19



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SY2019 Audit Plan – Status Update

	Start Date	Close Date	Status Update 04/18/2019
Audit Priorities			
SY18 Carry Over Audits			
Transportation - Certification & Inspections	10/2/2017	12/18/2018	Completed
P-Card Audit	3/16/2018	9/1/2018	Completed
Employee/Vendor Background Check	5/7/2018		In Process
IT General Controls Review	3/27/2018	9/7/2018	Completed
Miscellaneous Cash Activity Account Funds (MCAAF) Audits			
MCAAF Audits - New Principals			
Young MS	7/24/2018	8/20/2018	Completed
Tuskegee Airman Global Academy	9/5/2018	9/17/2018	Completed
Dunbar ES	8/21/2018	8/30/2018	Completed
Smith ES	7/31/2018	8/31/2018	Completed
Bunche MS	7/25/2018	9/28/2018	Completed
Brandon ES	8/8/2018	9/10/2018	Completed
Bolton ES	8/31/2018	10/11/2018	Completed
Cascade ES	9/12/2018	9/24/2018	Completed
Procurement Audit	9/28/2018		In Process
Nutrition Vendor Management & Oversight Review**	4/9/2019		In Process
Construction Audit**	3/6/2019		In Process
Charter School Operations	9/6/2018	2/12/2019	Completed
Pay Parity Audit	4/17/2019		In Process
Special Projects			
Investigations			Ongoing
Mkinsight Implementation, Training & Set Up	8/27/2018	3/25/2019	Completed
Audit Follow Up			Ongoing
Infinite Campus Access Controls**	1/28/2019	3/21/2019	Completed
Infinite Campus Monitoring & Oversight Review**	3/1/2019		In Process
**Audit to be performed by service provider.			

Revised effective February 28, 2019

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Infinite Campus Access Audit Overview

Audit Start Date: January 28, 2019

Report Issue Date: March 21, 2019

Objectives:

- The purpose of the audit was to determine if the controls around IC access are sufficient to provide reasonable assurance that all users who are granted access to Infinite Campus have been properly authorized and appropriately role-restricted in their level of access.

Tasks Performed to Achieve Objectives:

- Reviewed vendor documentation
- Interviewed key personnel
- Performed tests of user data from three different applications (IC, Active Directory and Lawson HR)

Scope: SY 2016 through February, 2019

Results: Our audit has allowed us to conclude with reasonable assurance that Infinite Campus access is well-controlled, but some improvements are needed.

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Infinite Campus Access Audit Overview

Observation 1	Recommendations	Manager's Response
<p>There are 536 Stale Accounts Within Infinite Campus</p>	<ol style="list-style-type: none"> 1. Develop a policy that establishes the rules around the granting and removing of access to Infinite Campus for employees and contractors. Within that policy stipulate the number of lapsed days since last sign-on after which access will be removed. Distribute that policy to all principals and central office managers, who have subordinates with access to Infinite Campus. 2. Perform a periodic review of users' date of last access into Infinite Campus. Remove access for any users whose last sign-on exceeds the allowed number of lapsed days. 3. Add an 'End Date' field to the SIS Access Request Form and require it to be filled for all requests. 	<p>The Data + Information Group of Atlanta Public Schools (DIG) recognizes the importance of ensuring the safety of student data with the Student Information System (SIS). Consequently the following guidelines have been developed to ensure access to data with the SIS remains secure and appropriate, as well as, ensuring that the system itself is secure.</p> <p>Internal Policy regarding access to the Student Information System Guidelines for requesting access to the Student Information System</p> <ul style="list-style-type: none"> • Infinite Campus User Access Request Form is required for any staff requesting access to the SIS or requesting that their access be modified. As part of the approval process a supervisor is required to authorize the access request. The supervisor will also be required to indicate how long the staff member should have access by entering an end date on the form. If the user's access should remain for the entirety of the employee's tenure at that location/school, the supervisor will have option to indicate that access should persist.

Infinite Campus Access Audit Overview

Observation 1 (Cont.)	Recommendations	Manager's Response
		<ul style="list-style-type: none"> • Prior to requesting access to the SIS, all users must have an Active Directory account, which will be used to provision access into the SIS. If the user is not an APS employee, the supervisor must follow the process to request an Active Directory account prior to submitting an Infinite Campus Access Request Form. <p>Guidelines for termination of access to the Student Information System</p> <ul style="list-style-type: none"> • All Infinite Campus staff and student accounts will be via the user's Active Directory credentials. This will ensure that as soon as a user is terminated or withdrawn the access will also be disabled. • Any account not accessed within a 12 month period will be automatically deactivated. This will allow for users who only need to access the system annually (i.e. Summer School, summer registration, etc.) to retain access for those actions. After 9, 10 and 11 months of inactivity an email will be generated to users who are indicated as active employees by the HR system of record to the email address in the SIS notifying the user that per DIG policy, after 12 months of inactivity their user account will be disabled in the SIS. <p><i>Implementation Date: July 1, 2019</i></p>

Infinite Campus Access Audit Overview

Observation 2	Recommendations	Manager's Response
<p>The Infinite Campus SOC 2 Report Had Not Been Reviewed Every Year</p>	<p>Develop a policy requiring that the Data Information Group obtain and review the SOC 2 report from Infinite Campus each year in February when the independent auditor issues it.</p>	<p>Internal Policy regarding annually obtaining and reviewing the Infinite Campus SOC 2 report</p> <p>Guidelines for requesting the annual Infinite Campus SOC 2 Report</p> <ul style="list-style-type: none"> • Data + Information Group (DIG) designated personnel will request the SOC 2 report, of the previous year, annually from the Student Information System vendor by the end of the first quarter of each year. • Data + Information Group (DIG) designated personnel will review the Student Information System SOC 2 report annually within 30 days of the report being made available by the vendor. • Prior to requesting access to the SIS, all users must have an Active Directory account, which will be used to provision access into the SIS. If the user is not an APS employee, the supervisor must follow the process to request an Active Directory account prior to submitting an Infinite Campus Access Request Form.

Infinite Campus Access Audit Overview

Observation 2 (Cont.)	Recommendations	Manager's Response
		<p>Guidelines for termination of access to the Student Information System</p> <ul style="list-style-type: none"> • All Infinite Campus staff and student accounts will be via the user's Active Directory credentials. This will ensure that as soon as a user is terminated or withdrawn the access will also be disabled. • Any account not accessed within a 12 month period will be automatically deactivated. This will allow for users who only need to access the system annually (i.e. Summer School, summer registration, etc.) to retain access for those actions. After 9, 10 and 11 months of inactivity an email will be generated to users who are indicated as active employees by the HR system of record to the email address in the SIS notifying the user that per DIG policy, after 12 months of inactivity their user account will be disabled in the SIS. <p><i>Implementation Date: July 1, 2019</i></p>

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Questions

