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April 24, 2026

VIA EMAIL @ ANNAM.HEHENBERGER@CMS.K12.NC.US

Ms. Anna Hehenberger
Charlotte-Mecklenburg Schools
4421 Stuart Andrew Blvd.
Charlotte, NC 28217

Re: Request for Information (RFI): 163-0410261GB – Compliance Assessment Services

Dear Ms. Hehenberger:

We appreciate the opportunity to participate in Charlotte-Mecklenburg Schools ("District") search for a professional compliance assessment service provider. We have prepared this proposal in accordance with the requirements outlined within the request for proposal. Nawrocki Smith understands the scope of services in respect to the Request for Proposal and meets all of the minimum requirements outlined within.

Why Choose Nawrocki Smith?

We appreciate the fact that selecting an compliance assessment firm is not an easy task. We offer you the following reasons why we believe our firm is best suited to serve the needs of the District:

- Our consultative approach is an important resource to our clients. We don't just do, we think as we do. In this manner, ideas and suggestions are brought to your attention throughout the course of our work.
- We will assign only experienced, seasoned professionals in carrying out the required services.
- Our timing is like clockwork. If we commit, we deliver. We are available to commence our work immediately.
- We are very fair when it comes to fees. You will find our rates and fee structure to be reasonable.

We have enclosed our formal proposal for professional compliance assessment services. Nawrocki Smith is independent of the District as defined by the U.S. General Accounting Office's Government Auditing Standards. Once you and your colleagues have reviewed our proposal, we would be happy to discuss any questions you may have. I am convinced we are the right Firm for the District and I give you my personal assurance that all of our resources will be brought to bear to ensure full satisfaction. Thank you for providing our Firm with the opportunity to work with your District. If you require any further information, please feel free to contact me at (631) 756-9500, extension 211.

Sincerely yours,

P. Dimitris Bantileskas, CPA/CFF/CITP, CVA, CFE, ISACA Cybersecurity Audit Certificate

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CHARLOTTE-MECKLENBURG SCHOOLS

PROPOSAL FOR COMPLIANCE ASSESSMENT SERVICES

RFI: 163-0410261GB

April 24, 2026

CONTACT PERSON

P. Dimitris Bantileskas, CPA/CFF, CITP, CVA, CFE, ISACA Cybersecurity Audit Certificate
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Executive Summary – Experts in Compliance Assessment Services

1

INDUSTRY LEADERSHIP: LI - IIA, LI - ACFE,

The Firm started in 1986 and has over 40 years of experience providing Compliance Assessment services. Leadership: Lauren Agunzo (CPA, CIA) - Board Member of Long Island Chapter of the Institute of Internal Auditors, Darin Iacobelli (CPA, CIA, CFE) and Dimitris Bantileskas (CPA, CFF, CVA, ISACA Cybersecurity Audit Certificate) - Board Member of the Long Island Chapter of Certified Fraud Examiners. Dimitris Bantileskas - Sits on the on the NYSSCPA Cybersecurity Committee. Our employees hold various professional designations:

- Certified Public Accountants (20)
- Certified Internal Auditors (5)
- Certified Fraud Examiners (6)
- Certified in Financial Forensics (6)
- ISACA Certificate in Cybersecurity Audits (1)
- AICPA SOC for Cybersecurity Certificates (2)

2

COMPLIANCE ASSESSMENT CLIENT TYPES

Public & Private Schools, BOCES, Higher Education, For-Profit, Non-Profits, Closely Held Private Entities, Townships, Villages, Banks, Credit Unions, Libraries, Healthcare Providers, and Manufacturing Companies.

3

RISK ASSESMENTS & COMPLIANCE ASSESSMENT PLANS

For over 60 School Districts

Define the Organization's risk profile including an overview of the key risks facing the Organization's financial operations. Review of roles and duties, internal controls and systems in over 20 business processes to determine whether the internal controls and reporting procedures were adequate thus safeguarding the Organization's assets.

4

COMPLIANCE ASSESSMENT ON FUNCTIONAL BUSINESS AREAS

For over 60 School Districts

Review the Organization Structure of various Department and operations, including, but not limited to policies, procedures, training, and information technology solutions. Evaluate staff titles and job descriptions to existing processes and user access.

5

CYBERSECURITY AUDITS & NIST GAP ANALYSIS

For over 30 School Districts

Assess the Organization's compliance with the New York State regulations, including Department of Financial Services, and National Institute Standards and Technology Cybersecurity Framework. Identify security control concerns that could affect the confidentiality, integrity, or availability of the information assets due to weaknesses and vulnerabilities in the system of internal controls, including key security controls. Evaluate the effectiveness of vulnerability assessments, response, and recovery programs.

6

AGREED UPON PROCEDURES

For over 30 School Districts, 3 Townships, 2 Libraries

Audit of the costs and fees submitted by capital project vendors to determine allowability based on contract provisions, the Federal Acquisition Regulations (48 CFR, Part 31) (FAR), and the policies prescribed by New York State Department of Transportation (NYSDOT)

7

FORENSIC ACCOUNTING ENAGEMENTS

For over 30 School Districts, Municipalities & Libraries

Investigated matters on behalf of Boards, Trustees, and Counsel that are sensitive in nature and require immediate due diligence/forensic accounting and dispute resolution services.

Client Success Stories

Provided below is a sample of our compliance assessment client success stories. Clients improved internal controls and optimized their operations' overall performance.

1

BUSINESS OFFICE PROCEDURAL MANUAL

District developed documented guidelines regarding the accounting and reporting, revenue collection and cash management, accounts payable, human resources, and payroll processes. Procedures are periodically reviewed to ensure that responsibilities are adequately performed and comply with District policies.

2

IMPROVING COMPLIANCE AND UTILIZATION OF GRANT FUNDS

Organization streamlined the grant approval and management process and introduced training on compliant spending practices, that led to an increase in the utilization of grant funds.

3

KICK BACK RECOVERY

\$30,000 inflated vendor invoices were credited back to the District as the Business Office has taken appropriate measures to monitor transportation vendor contracts and to review transportation routes according to District's policy.

4

ENHANCING CONTROL AND REDUCING UNAUTHORIZED PAYMENTS

Organization implementing a review process, including automated approval workflows and the use of positive pay systems, and reduced unauthorized payments and late payment fees.

5

VENDOR OVERAGES REVERSED

\$148,000 in late charges were credited back to the District as the Business Office has since taken appropriate measures to ensure timely review, approval, and payment of utility invoices.

6

CAPITAL PROJECT STATE AID RECOVERY

District recovered approximately \$10 million of financial aid from NYSED as Business Office timely submitted final building cost reports.

7

MAXIMUM MEDICAID REIMBURSEMENT

District maximized its Medicaid claims reimbursement as therapists began to comply with Medicaid reimbursement requirements, (e.g. recording session information directly into Frontline IEP system, and completing documentation such as IEP information, related service log data, provider or supervisor signatures, and evaluations during the required time frames).

8

CYBERSECURITY NIST GAP ANALYSIS

Organization developed documented guidelines regarding the organizational structure, hardware and software acquisition, logical security, monitoring computer users, data security, application security, network security, physical security, email security, service continuity, and online banking processes.

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We recognize that no two organizations are the same. Each has specific needs and requirements when it comes to their compliance assessment professionals. We pride ourselves on tailoring a plan for providing services to each client situation. The following provides an overview as to how we view necessary engagement characteristics: Communication, Responsiveness, Creativity, Efficiency and Timeliness.



We provide high quality, timely and value-added services.



Communications

We believe it is important for an organization to maintain a continuous exchange of ideas with its compliance assessment auditors. We intend to maintain an ongoing dialogue with the District throughout the assignment to provide timely input and to avoid any “surprises” along the way.



Responsiveness

The District's compliance assessment auditors should be sensitive to its needs and respond to its questions or concerns on a timely basis. We recognize the importance of follow-up and assure you that we will do everything possible to provide you with easy access to our Firm and immediate action in responding to your needs and questions.



Creativity

The District should expect its compliance assessment auditors to provide ideas and suggestions throughout each assignment. Our similar engagements allow for us to draw on those experiences to bring forth creative and unique approaches, as deemed necessary.



Efficiency & Timeliness

The compliance assessment services provided to the District should be well planned, efficiently executed and completed on a timely basis. Upon appointment, we would meet with you and develop an effective plan in order to address all of your requirements.

Why Choose Nawrocki Smith?



Experience. Our track record of performance is evidence that we're very good at what we do. We know what to look for, what to listen for, and our experienced professionals know how to provide you with the information that will be most useful for you. You will find that our experience drives your success.



Accountability. Nawrocki Smith stands behind its work and, when necessary, we stand up for our clients. Accountability is an integral part of our Firm's culture. We know you count on us to do what we promise, timely and accurately, adhering to the highest standards. We take that responsibility very seriously. So, when we commit, we deliver. Just ask our clients!



Commitment. We make an investment in our clients with genuine interest in, and concern for, your organization. When Nawrocki Smith goes to work for you, our expectation is for a long-term relationship. It's the nature of our business because the better we know you and understand how you operate and why, the better we can serve you.

Remote & On-Site Internal Audit Services



Experience

Nawrocki Smith has extensive experience in providing audit and consulting services on a remote and on-site basis. We are committed to meeting the audit requirements and we continue to have an excellent “delivery” record of quality, timely and proven value-added results related to compliance, process improvement and risk management.



Remote Audits

Nawrocki Smith has tailored its remote services to meet the specific needs for clients located in:

Client Location by State

- | | | |
|--------------|-----------------|----------------|
| • Colorado | • Connecticut | • Rhode Island |
| • Florida | • Illinois | • Virginia |
| • Maine | • Massachusetts | • Washington |
| • New Jersey | • New York | • Wisconsin |

Client Location by New York County

- | | | |
|-----------------------------|-----------------|-------------------|
| • Nassau & Suffolk Counties | • Monroe County | • Sullivan County |
| • Westchester County | • Orange County | • Ulster County |
| • Rockland County | • Putnam County | • Wayne County |
| • Dutchess County | | |



Efficiency

Virtual audits can often be more efficient than onsite engagements by eliminating travel time while allowing our team to focus directly on audit procedures. Using secure collaboration and video conferencing tools, we can review documentation, conduct interviews, and maintain real-time communication with client personnel without compromising audit quality or interaction.



Flexibility

Virtual audits provide greater flexibility in scheduling fieldwork and meeting internal deadlines. We often use a hybrid approach, reviewing documents and performing preliminary testing remotely before any onsite work, allowing us to streamline fieldwork, focus discussions, and minimize disruption to daily operations. In some engagements, the audit can also be performed entirely remotely, further enhancing efficiency.



Data Security

Nawrocki Smith maintains strong data security and privacy controls to protect client information, including full disk encryption, restricted laptop ports and drives, and laptop tracking technology to recover or disable devices if lost or stolen. Our security controls have also been reviewed by Fortune 500 insurance companies and were found to meet their vendor qualification standards.

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Nawrocki Smith provides the following responses to each requirement listed within the “**Number 5 – Requested Information**” section of the RFP:

Company overview and relevant experience

Nawrocki Smith LLP (the “Firm”) is a regional public accounting firm with offices in Hauppauge, New York. The Firm was founded in 1986 and is comprised of eight partners, two of whom were previously associated with one of our nation’s largest public accounting firms and four of whom have each dedicated a minimum of the past twenty years to Nawrocki Smith and to the success of its clients. The Firm employs approximately seventy (70) associates and support staff and services a diverse clientele throughout the Eastern United States.

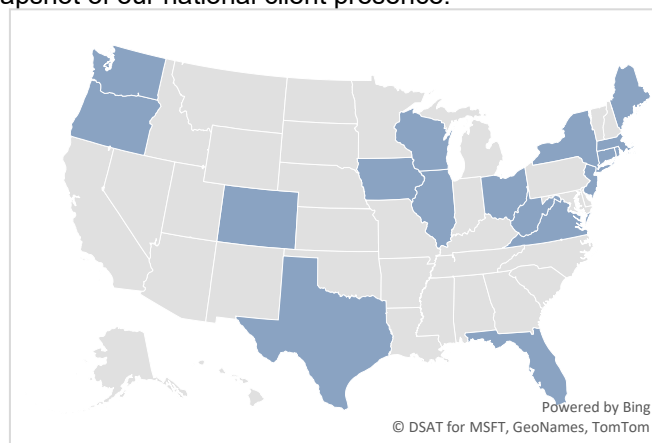
Nawrocki Smith LLP currently provides accounting and auditing services to over 200 government and not-for-profit organizations throughout the New York Metropolitan area, and is considered by many to be one of the leading accounting firms in this area. Nawrocki Smith is a full service accounting firm with various disciplines, inclusive of: External Audit, Internal Audit, Tax & Accounting, Business Valuation, Forensic Accounting and Dispute Resolution Services. Our clients include counties, townships, villages, libraries, higher education, public and private school districts, distributors, manufacturers, financial services, banks, credit unions, non-profits, healthcare providers, insurance carriers, and law firms across the United States as well as numerous other closely held concerns. Specifically, within the educational industry, Nawrocki Smith services over 70 internal audit clients, 40 external audit clients, 20 claims audit clients, and 30 cybersecurity audit clients.

Nawrocki Smith is qualified to perform the services. Our internal audit team is serviced by three (3) Partners and twenty (20) experienced staff. Our team of dedicated compliance assessment professionals has audited over one thousand (1,000) matters requiring extensive internal audit skills.

As a member firm in the Private Companies Practice Section of the American Institute of Certified Public Accountants, we have recently undergone a peer review of our Firm’s quality control procedures in rendering professional services. We are proud to announce that the results of our peer review were exceptional and for the ninth consecutive peer review, we received the highest quality rating.

Our Firm is also a member of the American Institute of Certified Public Accountants and the New York State Society of Certified Public Accountants. Our Partner, John Hoffman, sits on the Board of various insurance associations and organization as well as the Healthcare Committee of the New York State Society of Certified Public Accountants. Additionally, individuals of our Firm are members of the Association of Certified Fraud Examiners, an organization whose mission is to educate and train professionals in the specialty areas of forensic accounting and investigative auditing, and the Institute of Internal Auditors, an organization committed to education and excellence in internal auditing. Our Managing Partner, Lauren M. Agunzo, is Past President and current Board Member of the Institute of Internal Auditors Long Island Chapter. Our Partners, Darin Iacobelli and Dimitris Bantileskas, sit on the Board of the Long Island Chapter of Certified Fraud Examiners. Our Partner, Ernest Patrick Smith, has taught numerous Forensic Accounting classes and frequently lectures to other professionals on this topic.

Provided below is a graphical snapshot of our national client presence:



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Nawrocki Smith has been licensed and is active in public accounting for over forty (40) years and is in good standing with the New York State Board of Accountancy. Nawrocki Smith, as well as the Partners and Managers of the firm, are licensed to practice in the State of New York. Please see **Exhibit 1** for license information from the Office of the Professions, New York State Education Department.











Provided below is information of the size of the Firm and each of the Partners of Nawrocki Smith.

Nawrocki Smith staffing levels:

Partners	8
Directors	2
Senior Managers	4
Managers	3
Supervisors	8
Seniors	16
Staff	22
Administrative	5
Total	68

Nawrocki Smith encourages professional education and growth as evidenced by its firm wide 40-hour CPE requirement for CPA's and non-CPA's.

Nawrocki Smith employees hold various professional designations which we believe are vital to performing related services:

 CPA	Certified Public Accountant (CPA)	21
 CPA CFF	Certified in Financial Forensics (CFF)	6
 CFE	Certified Fraud Examiner (CFE)	6
 CIA	Certified Internal Auditor (CIA)	5
 CITP	Certified Information Technology Professional (CITP)	4
 CVA	Certified Valuation Analyst (CVA)	3
 CPA ABV	Accredited in Business Valuation (ABV)	2
 CGFM	Certified Government Financial Manager (CGFM)	2
 AICPA SOC 2	SOC for Cybersecurity Certificate (AICPA)	2
 Cybersecurity Audit	Certificate in Cybersecurity Audit	1

Information regarding the size of our compliance assessment staff is provided below:

Staff Level	Compliance Assessment Department	Engagement
Partners	3	3
Senior Managers	2	1
Managers	-	1
Supervisors	2	1
Senior Associates	8	2
Staff Associates	10	2
Administrative	2	1
Total	27	11

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Currently Nawrocki Smith services for EDUCATIONAL INDUSTRY as follows:



We have over 40 years of extensive experience in compliance assessment related matters, and we strive to reduce business risk exposures and contribute to your organization's performance goals. **Exhibit 4** contains our complete school district client listing. Nawrocki Smith has implemented numerous internal control best practices such as Purchasing, Accounts Payable, and Disaster Recovery at its clients (See **Page 2** – Client Success Stories). We have conducted numerous training sessions throughout New York State School Boards Association (NYSSBA), New York State Association of Budget Officials (NYSASBO), Regional Information Center One (RIC One), Government Finance Officers Association (GFOA), Institute of Internal Auditors (IIA), School District Internal Audit Alliance (SDIAA), Long Island Association of Fraud Examiners, and New York State Association of Municipal Purchasing Officials (SAMPO).

Provided below is a summary of our current professional experiences in the **compliance assessment** area:



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We have been providing compliance audit services to school districts and higher education for over 40 years and are recognized as internal audit leaders with school clients in NY, CT, WV and MA providing compliance assessment services.

Financial statement audit services

- Non-Profits
- Public School Districts
- Villages
- Libraries
- Townships
- Broker-Dealer Entities

Internal audit / Internal control assessment services

- Public School Districts/BOCES
- Higher Education
- Financial Banking Institutions
- Non-Profits & Private Schools
- Healthcare Organizations
- Manufacturing Entities
- Library & Special Districts
- Townships & Villages

Claim audit services

- Public School Districts
- Libraries
- BOCES
- Park Districts
- Sanitation Districts

Internal Audit Projects

- Governance & Planning
- Budget Development
- Accounting & Reporting
- Revenue & Cash Management
- Grants
- Payroll/ Benefits
- Human Resources
- Purchasing & Related Expenditures
- Facilities/ Capital Projects
- Fixed Assets
- Food Services
- Extraclassroom Activity fund
- Information Systems/ Cybersecurity
- Student Data Management
- Pupil Personnel Services
- Transportation
- Safety & Security
- Insurance / Risk Management

Information technology & cybersecurity audit services

- Compliance Audits (NY Ed-Law Part 2D, NIST CSF, CIS Controls)
- IT General Controls
- SOC 2 Examinations
- Compliance Audits (Shield Act/Ed-Law Part 2D)
- Penetration & Vulnerability Assessments
- IT Fixed Assets
- Logical Security
- Monitoring Computer User Permissions
- Data Security
- Software Security
- Network Security
- Physical Security
- Service Continuity
- Online Banking

Forensic accounting services

Many internal investigations conducted by Nawrocki Smith are presented to the Board and Management committee of the organization. Such recent verbal and written presentations included investigations into:

- Employee theft of time
- Employee theft and misuse of cash
- Employee theft of information technology assets
- Vendor relationships and procurement
- Vendor contract analysis and dispute resolution

Educational Organization Types:

Nawrocki Smith has been providing expert internal audit services to the following educational organizations:

- Public Schools
- Private Schools
- Nonprofit
- Universities
- Libraries

Entity Type	Client Ranges of Operating Budget
Counties	\$1,600,000,000 to \$3,130,000,000
School Districts	\$30,000,000 to \$1,000,000,000
Higher Education	\$100,000,000 to \$300,000,000
Townships	\$80,000,000 to \$100,000,000
Villages	\$6,000,000 to \$80,000,000
Libraries	\$2,000,000 to \$13,000,000
Not-for-Profits	\$10,000 to \$125,000,000
Banks/Credit Unions (total assets)	\$800,000 to \$1,000,000,000
Insurance Companies	\$1,000,000,000 plus

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Nawrocki Smith is in the forefront of providing professional accounting, auditing and forensic accounting services, evidenced by its related memberships, involvement and lectures as noted below.



ACTIVE MEMBERSHIPS

- American Institute of Certified Public Accountants
- New York State Society of Certified Public Accountants
- Institute of Internal Auditors
- Association of College & University Auditors
- Association of Certified Fraud Examiners
- Independent Private Sector Inspector General
- School District Internal Audit Alliance
- Private Companies Practice Section of the AICPA
- AICPA Governmental Audit Quality Center
- New York State Government Finance Officers' Association, Inc.
- Information Systems Audit and Control Association



ACTIVE LEADERSHIP

- Board Member – Long Island Chapter of Certified Fraud Examiners
- Board Member – Institute of Internal Auditors
- Board Members – School District Internal Audit Alliance
- Board Member - NYSSCPA's Public School Committee



RELATED LECTURES

2025

Nov-25

Inter Agency Council (IAC NY) – “Data Privacy & Cybersecurity Compliance: Role Clarification For Agency Officers”

Oct-25

Board Retreat – “Best Practices for Effective Operations of the School District Board of Education and Audit Committee”

Sep-25

ACUA – “Cybersecurity Audits Trends for Higher Education Institutions

Mar-25

NYSCATE – “Enhancing Cybersecurity in K-12: Monroe-Woodbury CSD's Journey with NIST CSF Adoption”

2024

Aug-24

ACUA – “Cybersecurity Audits With NIST Framework & CIS Controls”

May-24

RIC One – “Cybersecurity Audits With NIST Framework & CIS Controls”

2023

Nov-23

NYSBA – “Cybersecurity Audits With NIST Framework & CIS Controls”

Jan-23

Institute of Internal Auditors – “Cybersecurity audits With NIST Framework & CIS Controls”

2022

Jan-22

Nassau-Suffolk School Board Association – “Making the Cybersecurity Grade. How School Boards Can Lead Cybersecurity Efforts”

2021

Mar-21

Nassau Library System – “Internal Controls & Fraud Prevention”

Feb-21

Institute of Internal Auditors – “Life Insurance Fraud Case Study”

Jan-21

Institute of Internal Auditors – “Data Analytics with Microsoft Excel”

Jan-21

Institute of Internal Auditors – “Key Performance Indicators for Internal Auditors”

2020

Oct-20

New York State Society of Certified Public Accountants (NYSSCPA) – “Impact of Cyber Crime”

Feb-20

Institute of Internal Auditors – Fraud Conference - “20 Years Gone – Where are They?”

2019

Nov-19

Long Island Certified Fraud Examiner Chapter – “What is your Fraud IQ?”

Oct-19

New York State Association of Municipal Purchasing Officials (SAMPO) – “Accounts Payable Best Practices & Fraud Prevention Techniques”

Mar-19


Institute of Internal Auditors – Information Technology Conference - “SOC for Cybersecurity”

Proposed methodology and approach

We have designed our internal audit services to meet the standards that have been identified by the Institute of Internal Auditors, including the following:




We will provide the District with an annual Risk Assessment Report which will include an internal audit plan for the current fiscal school year as well as a proposed plan for subsequent years, subject to change based upon the following update.



Initial Risk Assessment Evaluation

Our initial risk assessment will include a review of the following:


- District policies and procedures
- Board of Education/Audit Committee Meetings
- Changes in management or key personnel
- External auditor management letters
- Organizational chart and job descriptions
- Recent Focus of State Comp. Audits
- Materiality to Financial Statements
- Financial reports provided to the Board
- District corrective action plans



Risk Assessment Functional Areas

We have designed our Initial Risk Assessment to assess the following **21** Functional Areas based on the District's operations:

- Governance & Planning
- Budget Development
- Accounting & Reporting
- Revenue & Cash Management
- Grants
- Payroll
- Human Resources
- Benefits
- Purchasing & Related Expenditures
- Facilities
- Capital Projects
- Fixed Assets
- Food Services
- Extraclassroom Activity fund
- Information Systems
- Cybersecurity
- Student Data Management
- Pupil Personnel Services
- Transportation
- Safety & Security
- Insurance / Risk Management



Risk Assessment Process

Our evaluation of the internal control structure will consist of:

- Understand the organization and its operations
- Review financial and historical information
- Evaluate the design of the internal control environment
- Identify and test key internal controls
- Identify risks and areas for improvement

Estimated timeline for completion

Nawrocki Smith is committed to meeting the time requirements of each compliance assessment project. We anticipate utilizing the estimated time-line for each phase noted below:



PHASE 1-Days 1-5 **PLANNING**

We develop a work plan from the onset of any assignment to obtain a clear understanding of the existing controls and a working knowledge of the area to be audited. The work plan outlines the team's key roles and responsibilities and the scope and procedures to maximize the efficiency of the audit. The work plan includes a timeline to provide a visual overview of the project from start to finish, including the dates of every deliverable and project milestone in chronological order.



PHASE 2-Days 5-30 **GATHERING INFORMATION**

We carefully search for and review documents (electronic and hard copy) related to the audit. In some instances, we circulate a document request letter to appropriate individuals requesting that they provide the internal audit team with the documents related to certain areas.



PHASE 3-Days 30-35 **INTERVIEWS**

We conduct interviews to understand how procedures are carried out. Information obtained during the interview may also identify additional areas that need to be pursued over the course of the audit. The selection of interviewees, and the sequence and timing of interviews will be carefully planned with the District.



PHASE 4-Days 35-60 **ANALYTICAL PROCEDURES**

We apply analytical procedures to identify the existence of unusual transactions or events, amounts, patterns or ratios and trends that may indicate matters that have investigative and/or financial-statement implications.



PHASE 5-Days 60-75 **REPORT WRITING**

A final written report will be issued to the District upon completion of the annual risk assessment and each of the subjected projects. Report content will include a description of work performed, results of testing performed, and recommendation for improvement.

The internal audit testing of controls will be based upon the current Board of Education approved District policies and a thorough review of the procedures in place at the District to enforce such policies and consideration of all regulatory and education law requirements applicable to each functional area of the District.

The approach to drawing audit samples will be determined at the completion of a risk assessment within a functional area, and if appropriate, consideration will be given to statistical sampling techniques in selecting such samples.

The type and extent of analytical procedures to be used in this engagement will be determined within each functional area subsequent to the completion of the risk assessment phase of our engagement.

The work related to providing compliance assessment services to the District will be performed at a location most efficient to the assignment, whether at our Hauppauge office and/or on-site at the District offices and other various locations as necessary.

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Our approach to conducting an internal audit consists of obtaining an in-depth understanding of the operations and mission of the District. Based upon our knowledge of the District at this time, we have identified the following business process categories for each area. Nawrocki Smith is designating specific employees to this assignment as the "Internal Audit Team." We believe the "Team" approach will allow for creating efficiencies in the engagement as we expect to meet every expectation of the District in carrying out our responsibilities.

Nawrocki Smith is available to begin this project immediately and is committed to providing full-time resources to meet the deadlines of the District. Our team is dedicated to internal audit and is always available at moment's notice to assist the District.

Nawrocki Smith conducts year-round internal audit services to complete the task with a high degree of confidence in a most efficient manner possible. Nawrocki Smith has worked on forensic accounting, internal audit, and litigation consulting matters for the past 40 years.

Operational

We evaluate the internal control structure and provide Management the information necessary to help optimize its overall performance, prioritize the key programs, and focus on those areas most critical to the Organization's success.

- Company Policies & Procedures
- Management Control Systems
- Organizational Analysis
- Management Reports

Financial

We apply financial analysis and we provide information regarding the Organization's profitability, efficiency, and stability and assist Management to decide whether to invest or lend capital, continue or discontinue operations, and select alternatives in structuring the business.

- Encumbrances
- Preparation of Budget Status Reports
- Compare Budget Revenue and Expenditure
- Analysis of Uncollected Revenues
- Projection of Year-end Fund Balance

Risk Assessments

A Risk Assessment provides a presentation of the Organization's risk profile pertaining to its financial operations and gives Management the information necessary to help optimize its overall performance.

- Understanding Critical Business Processes
- Identifying State Controls to Address Risks
- Identifying Risks of State Processes
- Recommending Improvements on Controls

Forensic Audits/ Fraud Investigations

We incorporate fraud detection into routine audit activity in efforts to mitigate the risks of financial reporting and reputational fraud.

- Fraud Awareness Training
- Fraud Risk Assessments
- Business Valuations
- Fraud Investigations
- Identifying Hidden Assets
- Due Diligence
- Governmental Program
- Discovery/Deposition
- Economic Damage

We will plan our investigation to achieve the following:



Conduct interviews to aid in the planning and execution of case data collection relevant to the matter.



Accumulate the data and marshal the necessary analytical tasks to either support or refute the legal theories presented. If requested, assist in any hearings, conferences and settlement negotiations.



Prepare a concise summary of the documents reviewed along with a statistical information on incurred losses and findings/recommendation.



Re-evaluate recommendations if provided with additional information from District.



If warranted, aggregate conclusions during the assignment, followed by the submission of an expert report, testify at deposition or trial and/or critique the opposing expert's report.

Advisory & Consulting

We provide guidance to the corporate governance in all forms of risk management including setting up processes to improve risk mitigation.

- Making Available Management Tools to Analyze Risk and Controls
- Monitoring and Reporting on Risks
- Provide Advise, Facilitating Workshops, Coaching Organization on Risk Controls
- Supporting Manager in Mitigating Risk

Data Analytics

We inspect, cleanse, and model data with the objective of highlighting meaningful information, suggesting conclusions, and supporting decision making.

- Sales & Operations
- Finance & Accounting
- Purchasing & Accounts Payable
- Measuring Key Performance Indexes

Information Technology / Cybersecurity Audits

We will evaluate the identified current and potential risks to core assets based on the control objectives of data confidentiality, data integrity, data privacy, especially in respect to students and personnel, and data availability. We will plan our cybersecurity audits to assess the following:

- General Controls
- Third Party Management & SOC Examinations
- Network Security
- Risk & Compliance Management
- Training & Consulting
- Penetration & Vulnerability Assessments
- Logical Security
- Business Continuity & Incident Response
- Physical Security
- Online Banking



Identify both the strengths and areas of improvement for compliance with the National Institute of Standards and Technology (NIST) in balance with the needs for ease of student and faculty access to resources.



Provide the foundation for a robust, documented cyber security management system including recommendations on additional policies and procedures based on industry standards and guidelines.



Identify vulnerabilities from both external and internal threats through penetration testing.



Review current configurations and execution of security tools for maximum return on investment.



Identify information security program management processes that require development or updating. Propose a crisis management plan in the event of a breach

Nawrocki Smith is qualified to perform audits related to information technology systems as evidenced below:

1

CYBERSECURITY AUDITS

Identify security control concerns that impact the confidentiality, integrity, and availability of information assets due to weaknesses/vulnerabilities in the system of internal controls. Evaluate the effectiveness of vulnerability assessments, responses, and recovery programs.

2

NIST GAP ANALYSIS

Assess the District's compliance with the Education Law Part 2-D and National Institute Standards and Technology Cybersecurity Framework. Evaluate the business risks associated with the 18 Critical Security Controls (CSC) identified by the Center of Internet Security (CIS).

3

INTERNAL/EXTERNAL PENETRATION TESTING MANAGEMENT

Oversee penetration tests conducted by our expert partners aimed to ethically circumvent security features of the system, exploit vulnerabilities to gain unauthorized access, and identify and prioritize the real-time risks to a network security environment.

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- **Use of Technology in Compliance Assessments**

Nawrocki Smith has been a leader in delivering accounting and audit services through remote and technology-enabled methods. With more than 40 years of experience in audit and advisory services, we are committed to helping organizations reduce risk exposures, strengthen internal controls, and support their operational and financial performance objectives. We apply a structured and collaborative approach that promotes effective communication, and efficient information sharing.



REMOTE MEETINGS

Nawrocki Smith remains readily available to respond to client needs and mobilize quickly when issues arise. We will designate two professionals who will be available to District by phone or video conference within 30 minutes of a request to address critical matters, system changes, or day-to-day operational needs. This responsiveness ensures timely communication and support whenever immediate guidance or assistance is required.



SYSTEMS

Nawrocki Smith has extensive experience utilizing audit functions within the software platforms commonly used by organizations (e.g. **QuickBooks, Munis, Great Plains, PeopleSoft, NewWorld, Ceridian, nVision, Finance Manager, WINCAP, Finance Plus, etc.**). Our team regularly operates within secure client environments, including VPN access to client systems and servers under authorized permissions, and virtual desktop environments protected by two-factor authentication (2FA).



DOCUMENT

Nawrocki Smith has a strong record of delivering high-quality, timely, and actionable information through secure and efficient communication channels. We utilize secure client portals, client-based cloud storage platforms (e.g., ShareFile, OneDrive, Dropbox, etc.), and encrypted email to safely exchange documents and information. Our clients also benefit from 24/7 access to our team through email, text, phone, and secure electronic fax, ensuring responsive communication and continuous support throughout the engagement.



DATA SECURITY

Nawrocki Smith utilizes advanced technology to securely collect, store, and analyze the data required to perform our services, with particular emphasis on protecting proprietary and confidential client information. Our firm has implemented multiple safeguards to protect the security and privacy of client data, including full encryption of data on firm laptops, restrictions on all drives and ports to only approved devices, and the use of laptop tracking technology to locate, secure, or remotely disable devices in the event they are lost or stolen. These measures help ensure that sensitive client information remains protected throughout the engagement.



DATA ANALYTICS

To evaluate the integrity of accounting data, Nawrocki Smith applies advanced data analytics techniques designed to identify anomalies, patterns, and potential irregularities within financial records. Examples of procedures include applying Benford's Law analysis, performing vendor database reviews, comparing employee and vendor addresses to identify potential conflicts, and analyzing gaps in check or purchase order sequences. Through the use of data analytics, we can efficiently extract and analyze large data sets.

Sample deliverables or reports from similar engagements

Nawrocki Smith has extensive experience in providing compliance assessment services to public school districts for over 40 years. While we value each relationship with our clients, provided below is a sample of compliance assessment engagements performed in last five (5) years similar to the services required within the RFP. See **Exhibit 4** for our complete school district client listing.

01

Risk Assessment

Client's Name: **Yonkers School District**
Contact: **Cristina Jarufe – Budget Analyst**
Phone Number: **914-376-8086**
Email: **cjarufe@yonkerspublicschools.org**
Engagement Partner: **Dimitris Bantileskas, CPA**

Description of Services

This analysis was used to define the District's risk profile. It provided an overview of the key risks facing the District's financial operations. We analyzed twenty-one (21) business processes and developed a long-term internal audit plan based upon our initial assessment of each area.

02

Grants Cycle Audit

Client's Name: **Rivehrhead Central School District**
Contact: **Dr. Marriane Cartissano – Asst. Super. For Business**
Phone Number: **631-369-6708**
Email: **marianne.cartisano@g.riverhead.net**
Engagement Partner: **Dimitris Bantileskas, CPA**

Description of Services

Reviewed the District's grants cycle to assess whether internal controls over grant governance, planning, budgeting, monitoring, accounting, reporting, and compliance are appropriately designed and operating effectively to safeguard District assets and support compliance with applicable grant requirements. Our analysis included major federal and state funding sources, such as Title programs, IDEA, ARP/ESSER, and other applicable grants, to evaluate whether grant funds are properly authorized, tracked, reported, and used in accordance with program guidelines, District policies, and regulatory requirements.

03

Human Resources Cycle Audit

Client's Name: **North Shore CSD**
Contact: **Jamie Pappas, CPA - Asst. Super. For Business**
Phone Number: **516-277-7801**
Email: **pappasjr@northshoreschools.org**
Engagement Partner: **Dimitris Bantileskas, CPA**

Description of Services

Performed an internal audit of the human resources cycle to determine whether internal controls over general organization structure & policies, recruitment and staffing, recordkeeping, attendance, evaluation, and retirement and resignation procedures are adequate thus safeguarding district assets.

04

Cybersecurity NIST Gap Analysis

Client's Name: **William Floyd UFSD**
Contact: **David Beggins - Asst. Super. For Business**
Phone Number: **631-874-1684**
Email: **dbeggins@wfsd.k12.ny.us**
Engagement Partner: **Dimitris Bantileskas, CPA**

Description of Services

Performed an internal audit of the cybersecurity cycle to determine whether internal controls over confidentiality, availability, and integrity of Personal Identifiable Information (PII) and over network, logical, data, software security and business continuity are adequate to ensure compliance with the NIST Framework, proper documentation is maintained and duties are properly segregated.

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Our goal is to assist the District in improving its operations, policies, procedures and internal controls. We are committed in providing you with objective information to determine whether public accountability is being maintained and to assist you in improving the efficiency and effectiveness of your operations and activities. Provided below we have outline our communication process to the District:

Board of Education: We perform our internal audit services on behalf of the Board of Education. We are available to meet with the Board of Education as requested as well as to present to the public during meetings. When deemed necessary, we contact the Board of Education President directly. Upon approval from the Audit Committee, we will be issuing final written reports and we will be meeting with the Board of Education to discuss our internal audit work plan. During these meetings will be discussing any significant issues or area of concern within the District's operations, beyond the typical financial transaction cycles where the internal auditor can provide increased comfort level of compliance.

Audit Committee: We will be issuing and presenting draft written reports to the Audit Committee upon the completion of our updated risk assessments, internal audit of cycle(s), key control reports and any other assignments. Our risk assessment report will provide a risk rating for each area of review along with an internal audit plan which will be based upon our prioritized risk. Our internal audit reports will provide observations and related recommendations which will enhance the internal control environment as well as efficiencies within the District. Additionally, we will perform follow-up procedures in order to obtain a status of the recommendations and provide feedback to the Audit Committee.

For your reference, we have provided a sample copy of the following reports and correspondence the District can expect to receive from Nawrocki Smith:

Exhibit 5 - Sample Risk Assessment Report

Exhibit 6 - Sample Internal Audit Cycle Report

Superintendent of Schools: We will be meeting with the Superintendent of School during our risk assessment and during the course of the year to discuss risk management and District's goals.

Assistant Superintendent for Business: The Assistant Superintendent for Business is our primary point of contact to commence, schedule, and plan our internal audit work. During the course of audit, we will be meeting with the Assistant Superintendent for Business to discuss our preliminary observations and provide supporting documents in advance, for reasonable review and consideration. We believe the "Team" approach will allow for developing open lines of communication year round and creating efficiencies in the engagement as we expect to meet every expectation of the District in carrying out our responsibilities.

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Estimated cost of assessment

Nawrocki Smith's estimated fee for professional services in regard to this engagement is **\$74,990**. Fees may be less based on actual hours worked. We will work closely with Management at Ulster County to address any concerns regarding our fee and the scope of our work plan.

We have applied discounted hourly rates to our proposed fee structure as follows:

STAFF LEVEL	REGULAR RATE	DISCOUNTED RATE
Partner	\$250	\$225
Senior Manager	\$225	\$200
Manager	\$205	\$180
Supervisor	\$190	\$165
Senior	\$175	\$150
Staff	\$150	\$125

If the District requests Nawrocki Smith to perform any additional services, such additional work shall be performed at the same rates set forth in the schedule of fees.

Nawrocki Smith will be billing District on a monthly basis. We are available to discuss any alternative payment structure with District.

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Provided below is our proposed hours and fees for each deliverable. Fees may be less based on actual hours worked.

	Partner	Senior Manager	Manager	Supervisor	Senior	Staff	Total
Hourly Rates	\$225	\$200	\$180	\$165	\$150	\$125	

PHASE 1 - WORK PLAN

Develop a work plan at the start of each assignment to understand existing controls and the audit area, and to define team responsibilities, scope, and procedures to support an efficient audit.

Estimated Hours	4	5	5	3	-	-	17
\$ Amount	\$900	\$1,000	\$900	\$495	\$0	\$0	\$3,295

PHASE 2 - INFORMATION GATHERING

Issue document request letters to obtain supporting information from appropriate personnel. Review relevant electronic and hard-copy documents.

Estimated Hours	2	4	6	8	10	12	42
\$ Amount	\$450	\$800	\$1,080	\$1,320	\$1,500	\$1,500	\$6,650

PHASE 3 - INTERVIEWS

Coordinate the selection, timing, and sequence of interviews with the District. Conduct interviews to understand how procedures are performed, identify any additional areas for review.

Estimated Hours	5	9	9	16	18	18	75
\$ Amount	\$1,125	\$1,800	\$1,620	\$2,640	\$2,700	\$2,250	\$12,135

PHASE 3 - ANALYTICAL PROCEDURES

Apply analytical procedures to identify unusual transactions, events, patterns, ratios, or trends that may indicate matters with investigative or financial reporting implications.

Estimated Hours	9	19	29	39	49	58	203
\$ Amount	\$2,025	\$3,800	\$5,220	\$6,435	\$7,350	\$7,250	\$32,080

PHASE 4 - REPORT WRITING

Draft final report, summarizing the work performed, testing results, and recommendations for improvement.

Estimated Hours	8	16	16	20	31	40	131
\$ Amount	\$1,800	\$3,200	\$2,880	\$3,300	\$4,650	\$5,000	\$20,830

Total Estimated Hours	28	53	65	86	108	128	468
Total Estimated Fees	\$6,300	\$10,600	\$11,700	\$14,190	\$16,200	\$16,000	\$74,990



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Key personnel and qualifications

Provided below is a description of the qualification and experience of the personnel likely assigned to this engagement. The biographies and resumes of the Partners and key staff are enclosed. (Please see **Exhibit 3**)



P. DIMITRIS BANTILESKAS,
CPA/CFF/CITP, CVA, CFE,
Certificate in Cybersecurity Audit

Engagement Partner

VP Membership of LIACFE

Over twenty (20) years of experience providing forensic accounting, internal audit, and cybersecurity audit services for governmental, not-for-profit, for-profit, financial institution and insurance companies. Current Board Member of the Long Island Chapter of Certified Fraud Examiners.



DARIN V. IACOBELLI,
CPA/CFF, CIA, CFE

Advisory Partner

VP Education of LIACFE

Over twenty-five (25) years of experience providing forensic accounting, internal audit and dispute resolution services to governments. Current Board Member of the Long Island Chapter of Certified Fraud Examiners and Member of Independent Private Sector Inspector Generals.



LAUREN M. AGUNZO,
CPA/CFF, CIA

Quality Review Partner

Board Member of IIA

Over twenty (20) years of experience providing internal audit, forensic accounting and dispute resolution services. Board Member of the Institute of Internal Auditors Long Island Chapter. Member of the NYSSCPA Public School Committee.

Our firm has a dedicated compliance assessment practice consisting of more than 20 experienced professionals available to support this engagement. This depth of resources allows us to ensure continuity, responsiveness, and subject matter alignment throughout the engagement. The primary team assigned to this engagement will include the following professionals:

Team Member	Role	Experience Summary
Jennifer Morris, CPA, CFE, CIA	Senior Manager	Fifteen (15) years of experience providing compliance assessment services to school districts, not-for-profit, and other governmental organizations.
Kyle Zaharatos, CIA	Manager	Thirteen (13) years of experience providing compliance assessment services to school districts, not-for-profit, and other governmental organizations.
Michael Reinhart	Supervisor	12 years of compliance assessment experience
Jack Blakley	Senior	5 years of compliance assessment experience.
Layla Roller	Senior	4 years of compliance assessment experience.
Anne Chiang	Staff	3 years of compliance assessment experience.
Allison Roche	Staff	3 years of compliance assessment experience.

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We maintain a structured quality review process to ensure the accuracy, consistency, and reliability of our internal audits. Each engagement is led by an experienced engagement partner who provides oversight throughout planning, fieldwork, and reporting. All workpapers and supporting documentation are reviewed by the Supervisor to confirm technical accuracy and adherence to the audit program, and then by the Engagement Partner for overall quality, and sufficiency of evidence.

The team above has extensive experience in providing the following services:

- Internal audit and internal control evaluations
- Forensic accounting engagements
- Dispute resolution services
- Fraud investigation
- Agreed-upon procedures assignments
- Litigation consulting services

The team above has obtained at least **40** hours of continuing professional education annually while employed with Nawrocki Smith. Those courses have included, but were not limited to internal auditing, governmental accounting and auditing, financial management and accounting, and fraud detection/protection.

This team combines leadership, technical expertise, and operational experience to provide a balanced approach that supports both strategic oversight and detailed execution. Additional compliance assessment specialists are available to supplement the team as needed to address specific risks, timelines, or emerging priorities.

Nawrocki Smith conducts year-round internal audit services to complete the task with a high degree of confidence in a most efficient manner possible. Nawrocki Smith has worked on forensic accounting, internal audit, and litigation consulting matters for the past 40 years.

Our firm is characterized by long-term organizational stability, exceptionally low attrition, and strong team continuity. Our proposed engagement team has worked together on numerous similar projects over several years, fostering deep collaboration, efficiency, and shared institutional knowledge. Our commitment to staff development, mentorship, and career advancement has created a highly engaged team, ensuring clients benefit from consistent, experienced professionals throughout the duration of each engagement.

Nawrocki Smith will not use the services of any subcontractors for the proposed work under this RFP. All work will be performed by our team, ensuring direct control over the quality and timeliness of deliverables.

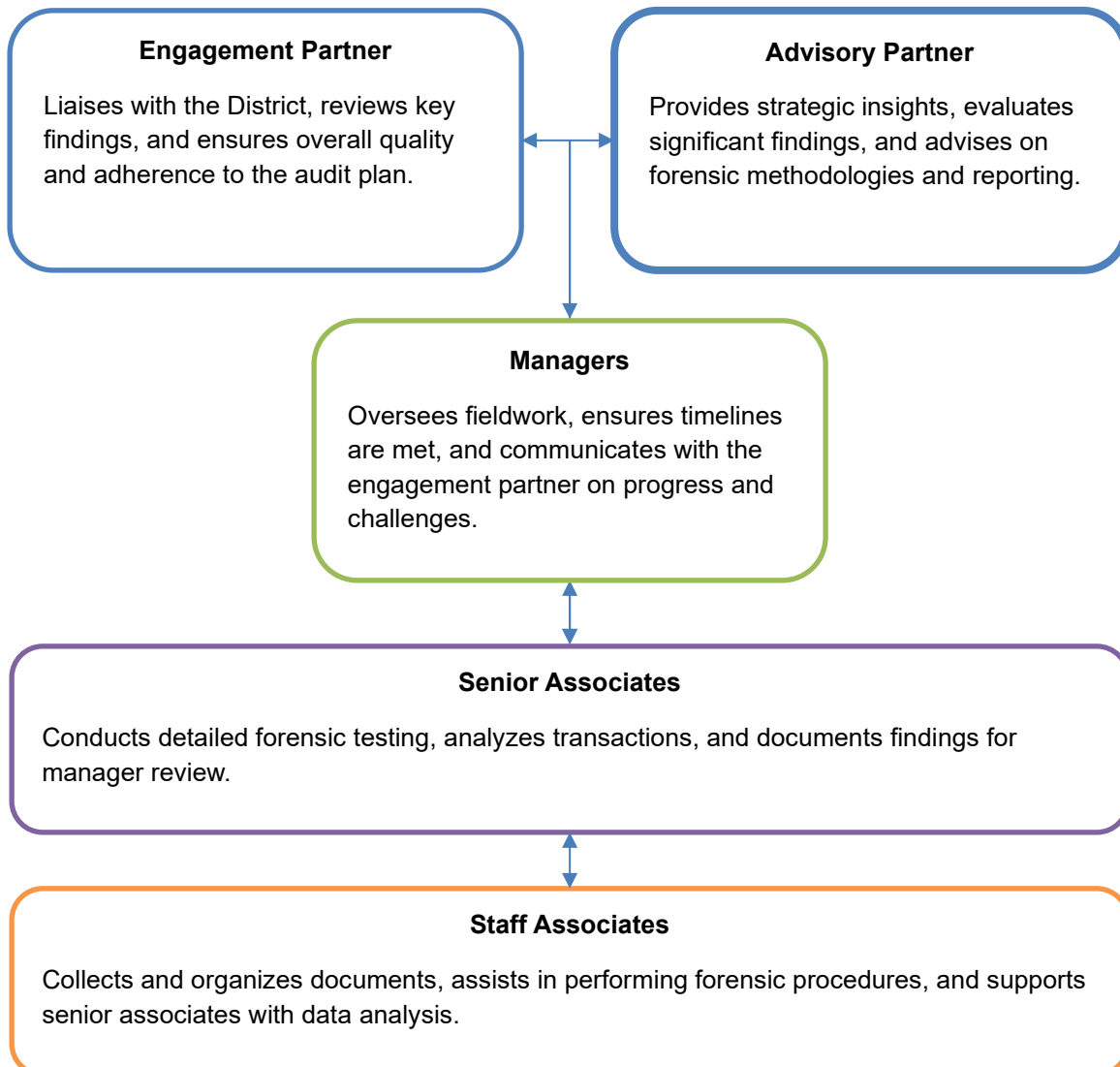
See **Exhibit 2** for our most recent Peer Review letter which represents the eleventh (**11th**) consecutive peer review of receiving the most favorable results possible. Our Peer Reviews have included government engagements such as Towns, Villages, Libraries, and School Districts. Internal audit engagements for school districts have also been selected during the Peer Review process. In light of our extensive work with some very high profile school districts (including the Roslyn School District), we have recently undergone a review of our audit work by the Office of the New York State Comptroller. The results of this audit were excellent, as we were one of the few CPA firms audited in our area which was found to meet professional standards by the Comptroller. As the independent auditors for the employee benefit plans for Long Island's largest private company, we were recently audited by the U.S. Department of Labor, which found our audit work to be satisfactory with no exceptions.

Charlotte-Mecklenburg Schools
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Our team will be in constant and on-going communication with the Management team of the District as well as key individuals involved in various aspects of District operations related to compliance assessment services in that area. Both the Partners and Managers will be in communication with the Senior, and staff and available for any questions or issues that may arise. The Partners will be available for any meetings with Management, the Audit Committee and Board. We perform follow up on all corrective action plan items and provide Management with a status of those items.

We have over 40 years of extensive experience in compliance assessment related matters, and we strive to reduce business risk exposures and contribute to your organization's performance goals. Nawrocki Smith team members are client centric compliance assessment providers. We believe in completing an assignment with purpose and value. Our clients quickly realize that as compliance assessment auditors, we have the client's best interest in mind, and we are a valued resource to provide guidance and feedback on mitigating risk and improving internal controls and workflow efficiencies.

Provided below is an organizational chart with the names and titles of the individuals assigned to this engagement. Nawrocki Smith will make staff available as deemed necessary.



Added Value Considerations

Because of our extensive experience in forensic accounting and internal audit related matters we strive to build strong business relationships with our clients. From start to finish you can rely on our quality work for addressing the unique financial intricacies of such projects. In addition to analyzing financial statements, pursuing evidence, and identifying assets, our added value services include the following:



EVALUATE STRENGTHS

Evaluating the strengths and weaknesses of the financial evidence and providing alternatives to locate evidential documents through practice management systems.



REDUCE RISK

Reduce business risk exposures and contribute to your organization's performance goals.



IMPROVE RESULTS

Our expertise and knowledge of internal controls, experience in your industry, business process and information technology knowledge and readily available local resources can help you improve your bottom line results.



CYCLICAL TESTING

We do an in-depth cyclical testing of various business and operational areas, perform a yearly risk assessment, and provide regular updates of control risk, among many other services.



COMPLIANCE

We have extensive experience in helping our clients meet all the regulatory requirements that the internal control function satisfies.



LONG-TERM VALUE

We help you build an internal control structure that improves your organization's long-term value and provides assurance to your stakeholders.



STRENGTHEN CONTROLS

Assisting executive management in developing documents, policies, procedures, forms, and checklists that strengthen internal controls.



DISPUTE SERVICE SUPPORT

Providing support in dispute related matters and the identification of possible strengths and weaknesses of related perspectives.

Thank you for your consideration

OUR LONG TERM COMMITMENT TO CHARLOTTE-MECKLENBURG SCHOOLS

One of our Firm's characteristics of which we are most proud is the long-term nature of our client relationships. This results from our philosophy of never taking a client for granted and always doing everything possible to fully service an organization while carrying out our responsibilities. While we can propose to do many things for the District at this point in time, our experience with similar clients over the long-term should provide you with a certain degree of comfort that our promises will be brought to fruition. Our approach to providing professional services as discussed earlier in this proposal have been very successful, and we believe is very much consistent with the long-term needs of your Organization.

We are confident we have the experience, resources and desire to provide the District with excellent client service.



ADDRESS

100 Motor Parkway
Hauppauge, NY 11788



PHONE

P: 631.756.9500
F: 631.756.9818



EMAIL

info@ns.cpa
www.ns.cpa

Exhibits

Exhibit 1 – Firm & Partner License Information

Exhibit 2 – Firm's External Quality Review Letter

Exhibit 3 – Resumes of Proposed Team

Exhibit 4 – Firm's Client Listing

Exhibit 5 – Sample Risk Assessment Report

Exhibit 6 – Sample Internal Audit Cycle Report

Charlotte-Mecklenburg Schools
Proposal for Compliance Assessment Services
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Hauppauge, NY 11788



Phone

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EXHIBIT 1

Firm & Partner License Information

Nawrocki Smith LLP				
Certified Public Accountancy Partnership - NYSED				
Partnership ID.	064420			
Board Approval Date	September 28, 2007			
Current Through	October 31, 2028			
<i>Partners</i>	<i>License Number</i>	<i>Date of Licensure</i>	<i>Status</i>	<i>Registered through Date</i>
Nawrocki, Michael E.	038557	2/2/1979	Registered	9/30/2026
Smith, Ernest, Patrick	069834	5/25/1993	Registered	12/31/2028
Agunzo, Lauren, Marie	079835	6/23/1998	Registered	9/30/2027
Hoffman, John, Kenneth	079885	6/30/1998	Registered	2/28/2027
Iacobelli, Darin, Vincent	083123	3/13/2000	Registered	8/31/2026
Tellier, David, Michael	084036	9/12/2000	Registered	7/31/2027
Angotta, Christopher, Anthony	125741	12/22/2017	Registered	7/31/2026
Bantileskas, Panagiotis, Dimitris	099699	5/7/2009	Registered	1/31/2027
Spatola, John, Matthew	104517	7/25/2010	Registered	8/31/2027



EXHIBIT 2

Firm's External Quality Review Letter



Report on the Firm's System of Quality Control

To the Partners of Nawrocki Smith LLP
and the National Peer Review Committee

We have reviewed the system of quality control for the accounting and auditing practice of Nawrocki Smith LLP (the firm), in effect for the year ended September 30, 2024. Our peer review was conducted in accordance with the Standards for Performing and Reporting on Peer Reviews established by the Peer Review Board of the American Institute of Certified Public Accountants (Standards).

A summary of the nature, objectives, scope, limitations of, and the procedures performed in a System Review as described in the Standards may be found at www.aicpa.org/prsummary. The summary also includes an explanation of how engagements identified as not performed or reported in conformity with applicable professional standards, if any, are evaluated by a peer reviewer to determine a peer review rating.

Firm's Responsibility

The firm is responsible for designing and complying with a system of quality control to provide the firm with reasonable assurance of performing and reporting in conformity with the requirements of applicable professional standards in all material respects. The firm is also responsible for evaluating actions to promptly remediate engagements deemed as not performed or reported in conformity with the requirements of applicable professional standards, when appropriate, and for remediating weaknesses in its system of quality control, if any.

Peer Reviewer's Responsibility

Our responsibility is to express an opinion on the design of and compliance with the firm's system of quality control based on our review.

Required Selections and Considerations

Engagements selected for review included engagements performed under *Government Auditing Standards*, including a compliance audit under the Single Audit Act, an audit of an employee benefit plan, and an examination of a Service Organization (SOC 2 Engagement).

As part of our peer review, we considered reviews by regulatory entities as communicated by the firm, if applicable, in determining the nature and extent of our procedures.

Opinion

In our opinion, the system of quality control for the accounting and auditing practice of Nawrocki Smith LLP, in effect for the year ended September 30, 2024 has been suitably designed and complied with to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Firms can receive a rating of *pass*, *pass with deficiency(ies)* or *fail*. Nawrocki Smith LLP has received a peer review rating of *pass*.

Flaherty Salmin LLP

Rochester, New York

March 26, 2025



EXHIBIT 3

Resumes of Proposed Team



P. DIMITRIS BANTILESKAS, CPA/CFF/CITP, CVA, CFE - Partner

Partner with over 20 years of experience leading forensic accounting, internal audit, cybersecurity audit, and consulting engagements across public, private, and nonprofit sectors. Proven track record managing complex investigations, litigation support, and compliance audits for boards, executives, and legal counsel. Recognized for strategic leadership, industry thought leadership, and ability to strengthen governance, detect fraud, and improve organizational resilience.



631-756-9500



dbantileskas@ns.cpa



dimitris-bantileskas



ns.cpa



100 Motor Parkway, Hauppauge, NY



WORK EXPERIENCE

Partner - Forensic Accounting, Consulting, Internal Audit, Cybersecurity Audit, and Business Valuation Services

12/2004 – Present

NAWROCKI SMITH LLP

Hauppauge, NY

- Lead the firm's Internal Audit, Cybersecurity Audit, Forensic Accounting, and Consulting practices.
- Direct high-profile forensic audits and special investigations involving fraud, embezzlement, kickbacks, asset misappropriation, and contract/vendor integrity.
- Provide litigation consulting and expert witness services, including financial damage measurement (lost profits, business interruption, property damage, occupational disability).
- Serve as auditor-in-charge for cybersecurity audits, performing IT risk assessments and compliance reviews aligned with CIS Controls, NIST, and sector-specific regulations.
- Oversee enterprise-wide financial, operational, compliance, and technology audits, delivering actionable recommendations to strengthen governance, controls, and efficiency.
- Advise boards of education, executives, and external counsel on complex investigations, governance, and compliance matters.
- Mentor and develop audit teams, enhancing firm capacity in risk, controls, and cybersecurity.



EDUCATION

1999 - 2001

TEI, UNIVERSITY OF ATHENS, GREECE

Major: Business Administration

Honors: Distinguished Student Award 2000

2001 - 2004

BARUCH COLLEGE, CUNY, NEW YORK

Bachelor of Business Administration: Accounting

Honors: Golden Key International Honors Society



CERTIFICATES



Certified Public Accountant (CPA) (New York)



Certified in Financial Forensics (CFF)
(American Institute of Certified Public Accountants)



Certified Information Technology Professional
(CITP) (American Institute of Certified Public Accountants)



Certified Fraud Examiner (CFE)



Certified Valuation Analyst (CVA)



Certificate in Cybersecurity Audit (ISACA)



MEMBERSHIPS

- **AICPA** – American Institute of Certified Public Accountants
- **NYSSCPA** - New York State Society of Certified Public Accountants
- **ACFE** – Association of Certified Fraud Examiners
- **LIACFE** – Association of Certified Fraud Examiners – Long Island Chapter
- **NACVA** – National Association of Certified Valuation Analysts
- **NYSIU** – New York State Investigation Unit
- **ISACA** – Information Systems Audit and Control Association

P. DIMITRIS BANTILESKAS, CPA/CFF/CITP, CVA, CFE – Partner



PROFESSIONAL PRESENTATIONS

2025

September 17, 2025
March 7, 2025

ACUA – “Cybersecurity Audits Trends for higher Education Institutions”
NYSATE – “Enhancing Cybersecurity in K-12: Monroe-Woodbury CSD’s Journey with NIST CSF Adoption”

2024

September 16, 2024
May 2, 2024

ACUA – “Cybersecurity Audits With NIST Framework & CIS Controls”
RIC One – “Cybersecurity Audits With NIST Framework & CIS Controls”

2023

November 13, 2023
January 20, 2023

NYSBA – “Cybersecurity Audits With NIST Framework & CIS Controls”
Institute of Internal Auditors – “Cybersecurity Audits With NIST Framework & CIS Controls”

2022

January 31, 2022
January 6, 2022

Nassau-Suffolk School Board Association – “Making the Cybersecurity Grade. How School Boards Can Lead Cybersecurity Efforts” – Part 2
Nassau-Suffolk School Board Association – “Making the Cybersecurity Grade. How School Boards Can Lead Cybersecurity Efforts” – Part 1

2021

March 4, 2021
February 5, 2021
January 14, 2021
January 15, 2021

Nassau Library System – “Internal Controls & Fraud Prevention”
Institute of Internal Auditors – “Life Insurance Fraud Case Study”
Institute of Internal Auditors – “Data Analytics with Microsoft Excel”
Institute of Internal Auditors – “Key Performance Indicators for Internal Auditors”

2020

October 22, 2020

New York State Society Certified Public Accountants (NYSSCPA) – “Impact of Cyber Crime”

2019

November 7, 2019
October 24, 2019

Long Island Certified Fraud Examiner Chapter – “What is your Fraud IQ?”
New York State Association of Municipal Purchasing Officials (SAMPO) - Accounts Payable Best Practices & Fraud Prevention Techniques

October 11, 2019
March 27, 2019

Institute of Internal Auditors (IIA) – Annual IT Audit Conference – KPIs for Internal Auditors
New York State Government Finance Officers’ Association, Inc. (NYSGFOA) – Establishing A Code of Ethics For Public Administration
Institute of Internal Auditors (IIA) – Annual Fraud Conference – Fraud in Our Backyard

February 15, 2019

2018

November 15, 2018
November 13, 2015

New York State Association of Municipal Purchasing Officials (SAMPO) - Accounts Payable Best Practices & Fraud Prevention Techniques
New York State Government Finance Officers’ Association, Inc. (NYSGFOA) – Establishing A Code of Ethics For Public Administration
New York State Government Finance Officers’ Association, Inc. (NYSGFOA) – Establishing A Code of Ethics For Public Administration

March 15, 2018

March 20, 2018

Nassau Association School Business Officials (NASBO) – “Internal Audit Function...10 Years Gone”

2017

November 15, 2017
November 15, 2017
October 13, 2017
September 27, 2017
June 29, 2017
April 26, 2017
March 24, 2017
March 7, 2017
February 17, 2017
Microsoft Excel

New York State Government Finance Officers’ Association, Inc. (NYSGFOA) – GFI Advanced Forum: Internal Control Best Practices
New York Anti Car Theft And Fraud Association (NYACT) – Workers’ Compensation Fraud
Institute of Internal Auditors (IIA) – Annual IT Audit Conference – Data Analytics with Microsoft Excel
Ruskin Moscou Faltischek – Financial Literacy for Lawyers (Part 2)
Ruskin Moscou Faltischek – Financial Literacy for Lawyers (Part 1)
Morritt Hock & Hamroff, LLP – Business Interruption Losses
New England Claim Association – FAQ – What is Your Financial IQ?
Nawrocki Smith – Social Media Risk Management
Institute of Internal Auditors (IIA) – Annual IT Audit Conference – Data Analytics with Microsoft Excel



COMPUTER SKILLS

- MS Office
- Microsoft Power BI
- Microsoft Power Query
- Lexis – Nexis
- ACL
- Oracle
- MUNIS
- Great Plains Dynamics
- WinCap
- Finance Plus
- Nvision



Darin V. Iacobelli, CPA/CFF, CFE – Partner

Mr. Iacobelli has twenty-five (25) years of experience in providing forensic accounting, internal audit, dispute resolution services, such as fraud investigations, insurance loss/economic damage consulting, agreed upon procedures, and other various complex matters to municipalities, insurance companies, health care providers, non-profit, and for profit entities. Mr. Iacobelli serves on the Board of the Long Island Chapter of Certified Fraud Examiners.



631-756-9500



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darin-v-iacobelli



ns.cpa



100 Motor Parkway, Hauppauge, NY



WORK

Forensic Accounting, Internal Audit, and Dispute Resolution Services

NAWROCKI SMITH LLP

Hauppauge, NY

- Experience in matters such as: business interruption claims, life, health and disability claims, loss of earnings/profits, wrongful termination, wrongful death, misappropriation of assets, employee theft,
- Conduct field interviews and in-depth analysis of financial documents and representations.
- Prepare report of audit findings and discuss issues with counsel, management and/or board members.
- Prepare expert reports and provide deposition assistance to counsel
- Conduct internal control risk assessments and operational and compliance audits
- Provide fraud prevention and internal control improvement consulting services
- Investigations involving counterfeit products and corporate fraud.



PROFESSIONAL PRESENTATIONS & PUBLICATIONS

February 2018
March 2017
October 2016
June 2016
May 2016
December 2014
May 2014
April 2013
February 2013
November 2010
May 2009
January 2010
October 2008
May 2004
June 2013
2009 – Present
December 1995
August 1995

Institute of Internal Auditors – “Nonprofit Fraud Update”
Nawrocki Smith School Seminar – Social Media Risk Management
NYS Association of Municipal Purchasing Officials (SAMPO) – “Ethics & Fraud for the Procurement Professional”
Nassau ASBO – “Fraud Awareness & Internal Control Best Practices”
McElroy, Deutsch, Mulvaney & Carpenter, LLP – “Business Interruption & Economic Damages”
Long Island Business Seminar – “Fraud & Employee Theft on Long Island”
NonProfit Update – “Forensic Accounting NonProfit Case Studies”
SDIAA Conference – “Internal Audit & Forensic Accounting Case Studies”
Eastern Claims Conference – “Forensic Accounting for Disability Claims”
Public Schools Conference – “Internal Audit & Risk Assessment Challenges”
NYS Association of School Business Officials – “Protecting Public Funds Treasurer Workshop”
SDIAA Conference – “Claims Auditing, Fraud & Interviewing Techniques”
NYS Association of School Business Officials – “Extraclassroom Activity Treasurer Workshop”
Midwest Claims Conference – “Occupational Analysis Techniques”
Publication – The CPA Journal: “Analyzing Local & Global Fraud”
Publication – MBA Thesis: “Analysis of Industrial Espionage and Corporate Security”
Publication – The Mouthpiece: “What is a Forensic Accountant”
Publication – International AntiCounterfeiting Coalition: “The Modern Day Counterfeiter”



CERTIFICATES

- **CPA** – Certified Public Accountant (New York)
- **CFF** - Certified Financial Forensics (American Institute of Certified Public Accountants)
- **CFE** - Certified Fraud Examiner (Association of Certified Fraud Examiners)
- **CIA** - Certified Internal Auditor (Institute of Internal Auditors)



MEMBERSHIP

- **AICPA** – American Institute of Certified Public Accountants
- **NYSSCPA** - NYS Society of Certified Public Accountants
- **ACFE** – Association of Certified Fraud Examiners (Board Member LIACFE)
- **NYSASBO** – New York State Association of School Business Officials



EDUCATION

1988 - 1992

UNIVERSITY OF SCRANTON
B.S. Degree / Major: Accounting

1994 – 1996

HOFSTRA UNIVERSITY
M.B.A / Management



Lauren M. Agunzo, CPA/CFF/CITP, CIA – Partner

Lauren has extensive experience in the assurance, risk management, forensic accounting and litigation support practice at Nawrocki Smith. She joined the Practice in 1995 and has diversified experience in matters pertaining to internal audit, internal controls, insurance defense, loss of earnings, business valuation, bankruptcy and other various complex matters. Lauren provides direct assistance to counsel in various aspects of litigation-related matters. Lauren has extensive experience in the internal audit area of the firm. Currently, she is the partner in charge of various internal audit engagements relating to school districts, financial institutions, not-for profits and other municipalities. She also heads up the team that provides SAS99 –Consideration of Fraud services in our financial statement audit engagements.



631-756-9500



lagunzo@ns.cpa



Lauren-Agunzo



ns.cpa



100 Motor Parkway, Hauppauge, NY



WORK EXPERIENCE

Partner – Risk Management/Internal Audit/Forensic Accounting Services

NAWROCKI SMITH LLP

Hauppauge, NY

- Extensive experience in providing risk management/internal audit and consulting services to school districts, governments, not-for-profits and financial institutions Conduct field interviews and in-depth analysis of financial documents and representations.
- Internal audit services include operational audits, compliance audits and forensic related projects. Prepare expert reports and provide deposition assistance to counsel.
- Provide services related to Sarbanes Oxley Compliance which includes documentation of process flow and identification of key controls.
- Provide fraud prevention and internal control improvement consulting services.
- Provide litigation support services and other consulting services to counsel and other clientele in variety of complex matters including insurance claims, bankruptcy, business valuations and loss of earnings.
- Provide individual and corporate income tax compliance services.



PROFESSIONAL PRESENTATIONS & PUBLICATIONS

Nov 2017	•	NYSASBO – “Social Media & Risk Management”
Dec 2016	•	NYSASBO – “Best Practices in Internal Controls & Fraud Detection”
May 2016	•	ASBO – Nassau Chapter – “Fraud Prevention & Best Practices in Internal Controls”
Jun 2015	•	NYSASBO – “Best Practices in Internal Controls & Fraud Detection”
Nov 2013	•	NYSASBO – “How to Work with Uncle Sam”
Nov 2011	•	NYSSCPA’s Public Schools Conference – “Risk Assessment Best Practices”
Sep 2011	•	SDIAA – “Legal References for Claim Audit Issues”
Sep 2011	•	SDIAA – “Tips & Techniques of Auditing Unusual Claims”
Jan 2011	•	SDIAA – “Best Practices for Effective Operations of the Audit Committee”
Nov 2010	•	NYSSCPA’s Public Schools Conference – “Risk Assessment & New Challenges on the Horizon”
Sep 2010	•	SDIAA – “Working with Your Audit Committee: Knowing and Communicating What is Expected”
Nov 2009	•	NYSASBO – Treasurer’s Role in Capital Projects”



CERTIFICATES

- **CPA** – Certified Public Accountant (New York)
- **CIA** – Certified Internal Auditor (Institute of Internal Auditors)
- **CFF** - Certified Financial Forensics (American Institute of Certified Public Accountants)
- **CITP** - Certified Information Technology Professional (Association of Certified Fraud Examiners)



MEMBERSHIPS

- **AICPA** – American Institute of Certified Public Accountants
- **NYSSCPA** – NYS Society of Certified Public Accountants
 - **Public School Committee** – Committee Member
- **CFE** – Certified Fraud Examiner
- **IIA LI** – Institute of Internal Auditors Long Island Chapter - President
- **SDIAA** – School District Internal Auditing Alliance – Advisory Board Member
- **CFE** – Certified Fraud Examiner



EDUCATION

1991 - 1995

HOFSTRA UNIVERSITY

B.S. Degree

Major: Business Administration - Concentration: Accounting

Jennifer Morris

CPA, CIA, CFE

O: 631.756.9500

jmorris@ns.cpa

Credentials

- New York State Certified Public Accountant
- Certified Fraud Examiner
- Certified Internal Auditor
- Member of Institute of Internal Auditors of Long Island
- Member of Association of Certified Fraud Examiners
- Member of American Institute Corporation of Certified Public Accountants

Experience

April 2011- Present

Senior Manager, Internal Audit/Consulting Services ■ **Nawrocki Smith LLP, Hauppauge, NY**

- Plan and perform internal audit and related consulting services to financial, governmental, and non-profit organizations.
- Complete audit reports to supervisory boards and communicate recommendations to enhance controls and efficiencies.
- Perform audit engagements for non-profit organizations, educational institutions, governmental entities, financial institutions, and employee benefit plans.
- Prepare financial statements and footnote disclosures in accordance with GAAP.
- Evaluate the effectiveness of internal controls and provide recommendations for improvement through management letter recommendations.
- Perform employee benefit audits for organizations of various sizes and analysis of financial activities, policies, procedures, processes, and controls.
- Perform peer reviews for employee benefit plan engagements
- Supervise and train staff in various internal audit and consulting engagements and communicate with partners

Education

St. Joseph's University, Patchogue, New York

December 2010

- Bachelor of Science in Accounting

Stony Brook University, Stony Brook, New York

May 2006

- Bachelor of Arts in English

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.

Kyle Zaharatos, CIA

O: 631.756.9500

kzaharatos@ns.cpa

Experience

October 2017- Present

Manager, Internal Audit ■ Nawrocki Smith LLP, Hauppauge, New York

- Plan and perform internal audit and consulting services for school districts, libraries, counties and park districts.
- Prepare and present audit reports to supervisory boards.
- Review and file 1095 forms for ACA compliance.
- Supervise and train staff in various internal audit and consulting engagements.
- Provide treasurer services to multiple clients.
- Conduct internal audit testing procedures for school districts in accordance with the Sarbanes-Oxley Act of 2002 and New York State education law.
- Develop detailed working papers to provide sufficient evidence of work completed in the execution of the audit program including testing and analyzing results.
- Develop and conduct internal audit programs for banks by assessing the effectiveness of internal controls.
- Perform forensic procedures as part of internal audit engagements to detect and investigate potential fraud, policy violations, and control weaknesses, delivering detailed findings to support risk mitigation and compliance efforts.
- Perform claims audit testing on cash disbursements for school districts.
- Prepare reports based on internal and claims audits to reflect outcomes of testing procedures.
- Communicate regularly with clients to coordinate field visits and meetings, obtain documentation, address concerns, and maintain relations.

Education

St. Joseph's University, New York

September 2013 - May 2017

- Bachelor of Science in Accounting

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.

Jack M. Blakley

O: 631.756.9500

jblakley@ns.cpa

Experience

April 2023- Present

Senior Associate, Internal Audit ■ Nawrocki Smith LLP, Hauppauge, New York

- Perform claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards to non-for-profit organizations, school districts, BOCES, and other municipalities.
- Generate testing sheets, exhibits, and reports to ensure timely and proper communication of findings and observations to clients.
- Develop detailed workpapers to provide sufficient evidence of work completed in the execution of the audit program, including testing and analysis of payroll, cybersecurity, IT, human resources, retiree benefits, and safety/security.
- Support the development and execution of audit procedures to assess the effectiveness of internal controls on risk management and fraud prevention.
- Spearhead forensic accounting cases for litigation and dispute matters.
- Assist with preparing of reports based on internal and claims audits to reflect outcomes of testing procedures.
- Provide treasury services to clients by performing month-end bank reconciliations and journal entry verifications.

May 2022- March 2023

Finance Associate ■ ECLI-VIBES , Islandia, New York

- Managed and maintained a \$3 million budget of federal and state grants to allocate toward client expenses, overhead and salaries.
- Contributed significantly to project-based work, including leading the comprehensive overhaul of our accruals in the general ledger system, streamlining the process and ensuring accuracy.
- Served as the primary point of contact for external auditors and oversaw all audit related activities.
- Recorded accounts payable and accounts receivable through processing and paying invoices, financial requests, reimbursements, and various organizational programs.
- Facilitated month-end closeout processes, general ledger journal entries, and account reconciliations.
- Processed payroll across two separate entities

Education

Perdue University Global

May 2022

- Bachelor of Science in Finance

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.

Layla Roller

O: 631.756.9500

lrolleri@ns.cpa

Experience

January 2023- Present

Senior Associate, Internal Audit ■ Nawrocki Smith LLP, Hauppauge, New York

- Perform claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Generate testing sheets, exhibits, and reports to ensure timely and proper communication of findings and observations to clients.
- Perform claims audit testing on cash disbursements for school districts.
- Conduct internal audit testing procedures for school districts in accordance with the Sarbanes-Oxley Act of 2002 and New York State education law.
- Conducted claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Conduct risk assessments across key business functions to identify control weaknesses and improvement opportunities.
- Develop detailed working papers to provide sufficient evidence of work completed in the execution of the audit program including testing and analyzing, including payroll, cybersecurity, IT, human resources, retiree benefits, and safety/security.
- Supported the development and execution of audit procedures.
- Assist with preparing of reports based on internal and claims audits to reflect outcomes of testing procedures.

October 2022- December 2022

Staff Accountant ■ Marshall and Moss , Westbury, New York

- Acquired QuickBooks knowledge
- Acquired tax program knowledge in Lacerte
- Assisted clients with record bank statements, obtaining and entering tax information
- Data Entry

Education

SUNY New Paltz, New Paltz, New York

August 2018 - May 2022

- Bachelor of Science in Accounting

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.

Anne Chiang

O: 631.756.9500

Achiang@ns.cpa

Experience

February 2025- Present

Staff Associate, Internal Audit ■ Nawrocki Smith LLP, Hauppauge, New York

- Perform claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Generate testing sheets, exhibits, and reports to ensure timely and proper communication of findings and observations to clients.
- Perform claims audit testing on cash disbursements for school districts.
- Conduct internal audit testing procedures for school districts in accordance with the Sarbanes-Oxley Act of 2002 and New York State education law.
- Conducted claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Conduct risk assessments across key business functions to identify control weaknesses and improvement opportunities.
- Develop detailed working papers to provide sufficient evidence of work completed in the execution of the audit program including testing and analyzing, including payroll, cybersecurity, IT, human resources, retiree benefits, and safety/security.
- Supported the development and execution of audit procedures.
- Assist with preparing of reports based on internal and claims audits to reflect outcomes of testing procedures.

January 2022-January 2024

UX Lead ■ Kingfield Corporation, New York, New York

- Collaborated with Product Management to gather and document user requirements, ensuring alignment with project timelines, regulatory standards, and internal control objectives to mitigate risk throughout development.
- Conducted risk assessments of the current engineering process and identified potential risk areas such as system integrity and areas for process improvements, technical feasibility, and providing actionable solutions to strengthen controls and ensure compliance.
- Developed and documented user journey maps and workflows which enhanced process visibility and ensured alignment with established controls, improving compliance and security within the design system.

Education

St. John's University, Queens, New York

September 2024 - Present

- Master of Science in Accounting

Syracuse University, New York

January 2018 – June 2020

- Master in Business Administration in Finance

Pratt Institute, Brooklyn, New York

- Bachelor of Fine Arts in Communications Design

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.

Allison Roche

O: 631.756.9500

Aroche@ns.cpa

Experience

February 2025- Present

Staff Associate, Internal Audit ■ Nawrocki Smith LLP, Hauppauge, New York

- Perform claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Generate testing sheets, exhibits, and reports to ensure timely and proper communication of findings and observations to clients.
- Perform claims audit testing on cash disbursements for school districts.
- Conduct internal audit testing procedures for school districts in accordance with the Sarbanes-Oxley Act of 2002 and New York State education law.
- Conducted claims audits to assess accuracy, compliance with policy guidelines, and adherence to regulatory standards.
- Conduct risk assessments across key business functions to identify control weaknesses and improvement opportunities.
- Develop detailed working papers to provide sufficient evidence of work completed in the execution of the audit program including testing and analyzing, including payroll, cybersecurity, IT, human resources, retiree benefits, and safety/security.
- Supported the development and execution of audit procedures.
- Assist with preparing of reports based on internal and claims audits to reflect outcomes of testing procedures.

January 2024-January 2025

Accountant ■ Slater, Kavitt & Schultz , New York, New York

- Preparation of Tax returns
- Preparation of financial statements.
- Input journal entries and bank reconciliations.
- Processed payroll and sales tax liabilities
- Processed S-Corp selections and formations of new entities
- Assist with registration and business licensing across different states.
- Data entry

Education

SUNY Polytechnic Institute

January 2025 – Present

- Master of Science in Accounting
- Forensic Concentration Certificate

Empire State University

December 2024

- Bachelor of Science in Accounting

Continuing Professional Education

- 40 hours of Continuing Professional Education have been obtained during the past year, including 20 hours of education in internal audit and internal controls.



EXHIBIT 4

Firm's Client Listing

Nawrocki Smith LLP

Internal Audit School District Client Listing

As of April 2026

CLIENT	ADDRESS	TOWN	Zip Code	CONTACT	PHONE
Babylon UFSD	50 Railroad Avenue	Babylon, NY 11702	11702	Deidre Lunetta	631-893-7925
Baldwin SD	960 Hastings Street	Baldwin, NY 11510	11510	James Robinson	516-434-6000
Beacon CSD	10 Education Drive	Beacon, NY 12508	12508	Ann Marie Quartironi	845-838-6900
Bedford CSD	632 South Bedford Road	Bedford, NY 10506	10506	Jose Formoso	914-241-6018
Bethpage UFSD	10 Cherry Avenue	Bethpage, NY 11714	11714	Scott Harrington	516-664-4030
Brentwood UFSD	52 Third Avenue	Brentwood, NY 11717	11717	Stacy O'Connor	631-434-2311
Center Moriches SD	529 Main Street	Center Moriches, NY 11934	11934	Bruce Singer	631-878-0052
Chappaqua CSD	66 Roaring Brook Road	Chappaqua, NY 10514	10514	Joshua Culwell-Block	914-238-7200
Comsewogue SD	290 Norwood Avenue	Brookhaven, NY 11776	11776	Susan Casali	631-474-8116
East Meadow SD	718 The Plain Road	Westbury, NY 11590	11590	Jennifer Frisenda	516-478-5737
East Moriches UFSD	523 Montauk Highway	East Moriches, NY 11940	11940	Dean Mittleman	631-878-0162
Eastchester SD	580 White Plain Road	Eastchester, NY 11940	11940	Linda Carlin	914-793-6130
Franklin Square	760 Washington Street	Franklin Square, NY 11010	11010	Rich Cunningham	516-481-4100
Freeport PS	235 North Ocean Avenue	Freeport, NY 11520	11520	Idowu Ogundipe	516-867-5212
Half Hollow Hills SD	525 Half Hollow Road	Dix Hills, NY 11746	11746	Anne Marie Marrone Caliendo	631-592-3030
Hendrick Hudson SD	60 Trolley Road	Montrose, NY 10548	10548	Jill Figarella	914-257-5132
Hewlett-WoodmerePS	One Johnson Place	Woodmere, NY 11598	11598	Charlie Carollo	516-374-8100
Hicksville UFSD	200 Division Avenue	Hicksville, NY 11801	11801	Marcy Tannenbaum	516-733-2110
Islip PS	215 Main Street	Islip, NY 11751	11751	Donna Brower	631-859-2200
Jericho UFSD	99 Cedar Swamp Road	Jericho, NY 11753	11753	Victor Manuel	516-203-3600
Lakeland CSD	1086 East Main Street	Shrub Oak, NY 10588	10588	Pam Delladona	914-245-1700
Lawrence SD	PO Box 477	Lawrence, NY 11559	11559	Jeremy Feder	631-295-7030
Liberty CSD	115 Buckley Street	Liberty, NY 12754	12754	Laurene McKenna	845-292-6171
Mahopac SD	179 East Lake Boulevard	Mahopac, NY 10541	10541	Alyssa Murray	845-628-3415
Malverne UFSD	301 Wicks Lane	Malverne, NY 11565	11565	Christopher Caputo	516-887-6417
Miller Place UFSD	275 Route 25A, Unit #43	Miller Place, NY 11764	11764	Colleen Card	631-474-2700
Monroe Woodbury CSD	278 Route 32	Central Valley, NY 10914	10914	Patrick Cahill	845-460-6241
Mount Pleasant SD	825 Westlake Drive	Thornwood, NY 10597	10597	Dr. Peter Giarrizzo	914-769-5500
Mount Sinai SD	118 North Country Road	Mt. Sinai, NY 11766	11766	Linda F. Jensen	631-870-2563
Mount Vernon CSD	165 North Columbus Avenue	Mt. Vernon, NY 10553	10553	TBD	914-665-5000
Northport-East Northport SD	158 Laurel Avenue	Northport, NY 11768	11768	Robert Howard	631-262-6600
Northshore CSD	112 Franklin Avenue	Sea Cliff, NY 11579	11579	James Pappas	516-277-7801
Nyack UFSD	13A Dickinson Avenue	Nyack, NY 10960	10960	Enrique Catalan	845-353-7000
Oceanside UFSD	145 Merle Avenue	Oceanside, NY 11572	11572	Dr. Jerel Cokley	516-678-1200
Oyster Bay-East Norwich CSD	1 McCouns Lane	Oyster Bay, NY 11771	11771	Zachery Nyberg	516-624-6500
Pearl River SD	135 West Crooked Hill Road	Pearl River, NY 10965	10965	Lillian Richiera	845-620-3999
Peekskill City SD	1031 Elm Street	Peekskill, NY 10566	10566	Cynthia Hawthorne	914-737-3300
Port Jefferson SD	550 Scraggy Hill Road	Port Jefferson, NY 11777	11777	Sean Leister	631-476-4413
Port Washington UFSD	100 Campus Drive	Port Washington, NY 11050	11050	Kathleen Manuel	516-767-5000
Portchester-Rye UFSD	113 Bowman Avenue	Port Chester, NY 10573	10573	Philip Salerno	914-934-7906
Putnam Valley CSD	171 Oscawana Lake Road	Putnam Valley, NY 10579	10579	Grace Chan	845-528-8125
Riverhead CSD	814 Harrison Avenue	Riverhead, NY 11901	11901	Dr. Marianne Cartisano	631-369-6708
Rocky Point UFSD	170 Route 25A	Rocky Point, NY 11778	11778	Chris Van Cott	631-744-1600
Roosevelt UFSD	240 Denton Place	Roosevelt, NY 11575	11575	Gary Gentles	516-345-7023
Roslyn PS	300 Harbor Hill Road	Roslyn, NY 11577	11577	Susan Warren	516-801-5030
Sachem SD	51 School Street	Lake Ronkonkoma, NY 11779	11779	Michell Psarakis	631-471-1352
Scarsdale UFSD	2 Brewster Road	Scarsdale, NY 10583	10583	Andrew Lennon	914-721-2400
Seaford UFSD	1600 Washington Avenue	Seaford, NY 11783	11783	Rhonda Meserole	516-592-4004
South Country SD	189 Dunton Avenue	East Patchogue, NY 11772	11772	John Belmonte	631-730-1520
South Huntington UFSD	60 Weston Street	Huntington Station, NY 11746	11746	Michael Conway	631-425-5300
Syosset CSD	99 Pell Lane	Syosset, NY 11791	11791	Dr. Patricia Rufo	516-364-5600
Three Village CSD	PO Box 9050	East Setauket, NY 11733	11733	Jeff Carlson	631-730-4010
Valley Stream 30 UFSD	175 North Central Avenue	Valley Stream, NY 11580	11580	Marcela Moran	516-285-9881
Wantagh UFSD	3301 Beltagh Avenue	Wantagh, NY 11793	11793	Anthony Cedrone	516-679-6308
West Babylon SD	200 Old Farmingdale Road	West Babylon, NY 11704	11704	Victoria Galante	631-376-7701
Westbury UFSD	2 Hitchcock Lane	Old Westbury, NY 11568	11568	Mary O'Neill	516-874-1800
William Floyd UFSD	240 Mastic Beach Road	Mastic Beach, NY 11951	11951	David Beggins	631-281-0659
Yonkers PS	1 Larkin Center, 3rd Floor	Yonkers, NY 10701	10701	Cristina Jarufe	914-376-8086

Nawrocki Smith LLP

Claim Audit School District Client Listing
As of April 2026

CLIENT	ADDRESS	TOWN	Zip code	CONTACT	PHONE
Bellmore PS	580 Winthrop Avenue	Bellmore, NY 11710	11710	Robin Lufrano	516-679-2902
Bellmore-Merrick CSD	1260 Meadowbrook Road	North Merrick, NY 11566	11566	Mikalea Coni	516-992-1020
Cold Spring Harbor CSD	75 Goose Hill Road	Cold Spring, NY 11724	11724	Joseph Dragone	631-367-5928
East Ramapo SD	105 South Madison Aveue	Spring Valley, NY 10977	10977	Linda Macias	845-577-6061
Eastern Suffolk BOCES	201 Sunrise Highway	Patchougue, NY 11772	11772	Katelyn Fretto	631-687-3134
Great Neck PS	345 Lakeville Road	Greak Neck, NY 11020	11020	John O'Keefe	516-441-4020
Huntington UFSD	50 Tower Street	Huntington Station, NY 11746	11746	Dr. Rubie Harris	631-673-2121
Levittown PS	150 Abbey Lane	Levittown, NU 11756	11756	Michael Fabiano	516-434-7007
Longwood CSD	35 Yaphank Middle Island Road	Middle Island, NY 11953	11953	Janet Bryan	631-345-2796
Merrick UFSD	21 Babylon Road	Merrick, NY 11566	11566	Ryan Butler	516-992-7240
New Hyde Park-Garden City UFSD	1950 Hillside Avenue	New Hyde Park, NY 11040	11040	Michael Frank	516-434-2300
New Rochelle CSD	515 North Avenue	New Rochell, NY 10801	10801	Bill Pastore	914-576-4240
Plainedge SD	241 Wyngate Drive	Massapequa, NY 11758	11758	Peter Porrazzo	516-992-7462
Plainview-Old Bethpage CSD	106 Washington Avenue	Plainview, NY 11803	11803	Chris Dillon	516-434-3050
Rochester City SD	131 W. Broad Street	Rochester, NY 14614	14614	Anissa Henry-Wheeler	585-262-8352
Sewanhaka Central HS District	77 Landau Avenue	Floral Park, NY 11001	11001	Kevin O'Brien	516-488-9800

Nawrocki Smith LLP

External Audit School District Client Listing

As of April 2026

CLIENT	ADDRESS	TOWN	ZIP Code	CONTACT	PHONE
Byram Hills Central School District	10 Tripp Lane	Armonk, NY 10504	10504	Kelly Siebert	(914) 273-4082
Commack Union Free School District	P.O. Box 150	Commack, NY 11725	11725	Laura Newman	(631) 858-3590
Deer Park Union Free School District	1881 Deer Park Avenue	Deer Park, NY 11729	11729	Margie Jimenez	(631) 274-4020
East Rockaway Union Free School District	443 Ocean Avenue	East Rockaway, NY 11518	11518	Michael Van Wart	(516) 887-8300
Elmont Union Free School District	135 Elmont Road	Elmont, NY 11003	11003	Thomas Galante	(516) 326-5500
Elwood Union Free School District	100 Kenneth Avenue	Greenlawn, NY 11740	11740	Lorraine Drunkel	(631) 266-5404
Farmingdale Union Free School District	50 Vancott Avenue	Farmingdale, NY 117	11735	Michael Motisi	(516) 434-5100
Garden City Union Free School District	56 Cathedral Avenue	Garden City, NY 115	11530	Dana DiCapua	(516) 478-1042
Island Trees Union Free School District	74 Farmedge Road	Levittown, NY 11756	11756	Susan Unhold	(516) 520-2115
Kings Park UFSD	180 Lawrence Road	Kings Park, NY 11754	11754	Shannon Meehan	(631) 269-3335
Locust Valley Central School District	22 Horse Hollow Road	Locust Valley, NY 115	11560	Karen Horoszewski	(516) 277-5040
Lynbrook Union Free School District	111 Atlantic Avenue	Lynbrook, NY 11563	11563	Joel Press	(516) 887-0258
Mamaroneck Public Library	136 Prospect Avenue	Mamaroneck, NY 105	10543	Patricia Byrne	(914) 698-1250
Mineola Union Free School District	2400 Jericho Turnpike	Garden City, NY 110	11040	Will Herman	(516) 237-2050
North Babylon Union Free School District	5 Jardine Place	North Babylon, NY 11	11703	Olivia Buatsi	(631) 620-7000
North Bellmore Union Free School District	2616 Martin Avenue	North Bellmore, NY 1	11710	Amy Joyce	(516) 992-3000
Rye Neck Union Free School District	310 Hornidge Road	Mamaroneck, NY 105	10543	Carolyn Mahar	(914) 777-5210
Sayville Union Free School District	99 Greely Avenue	Sayville, NY 11782	11782	Robert Bartels	(631) 244-6510
Shelter Island Union Free School District	33 North Ferry Road	Shelter Island, NY 11	11964	Brian Doelger	(631) 749-0902
Tuxedo Union Free School District	1 Tornado Drive	Tuxedo, NY 10987	10987	Alyssa Hasburk	(845) 351-2296
Uniondale Union Free School District	933 Goodrich Street	Uniondale, NY 11553	11553	Mary Martinez-Lagnado	(516) 560-8800
White Plains Central School District	5 Homeside Lane	White Plains, NY 106	10605	Ann Vaccaro-Teich	(914) 422-2000



EXHIBIT 5

Sample Risk Assessment Report



School District

Initial Risk Assessment
Pertaining to the Internal Controls
of District Operations

As of December 2021

**INDEPENDENT ACCOUNTANTS' REPORT
ON APPLYING AGREED UPON PROCEDURES**

The Board of Education
School District

We have performed the procedures enumerated below, which were agreed to by the School District (the "District"), solely to assist the District. This agreed-upon procedures engagement was performed in accordance with standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified users of the report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

We have developed our Initial Risk Assessment by performing certain internal audit procedures pertaining to the time period ending December 2021. The Initial Risk Assessment and related internal audit plan concentrate on the following key internal control areas:

- | | |
|---------------------------------------|--------------------------------|
| • Governance and Planning | • Fixed Assets |
| • Budget Development | • Food Service |
| • Accounting and Reporting | • Extraclassroom Activity Fund |
| • Revenue and Cash Management | • Information Systems |
| • Grants | • Cybersecurity |
| • Payroll | • Student Data Management |
| • Human Resources | • Pupil Personnel Services |
| • Benefits | • Transportation |
| • Purchasing and Related Expenditures | • Security and Safety |
| • Facilities Maintenance | • Insurance / Risk Management |
| • Capital Projects | |

We are available to discuss this report with the Board of Education or others within the District at your convenience.

These agreed-upon procedures do not constitute an examination or audit of the District's financial statements. Accordingly, we do not express such an opinion or limited assurance. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the use of the School District and Board of Education and should not be used by those who have not agreed to the procedures and taken responsibility for the sufficiency of the procedures for their purposes.

Very truly yours,

Nawrocki Smith LLP

November 26, 2025

School District
Initial Risk Assessment Report
Pertaining to the Internal Controls of District Operations

As of December 2021

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School District
Initial Risk Assessment
As of December 2021

RISK ASSESSMENT OVERVIEW

The Risk Assessment report provides a presentation of our view of the District's risk pertaining to its financial operations. It gives the District's administration the information necessary to help optimize its overall performance. The report identifies, expresses, and prioritizes the key program risks so that the District's administration can focus on those areas most critical to its success. This analysis is used to define the District's risk profile. It will provide an overview of the key risks facing the District's financial operations.

In accordance with the laws of New York, 2005, Chapter 263, all school districts and BOCES were required to establish an internal audit function no later than July 1, 2006 and be in operation no later than December 31, 2006. This function should include, at a minimum, the development of a risk assessment of district operations, including but not limited to:

- A review of financial policies, procedures and practices.
- An annual review and update of such risk assessment.
- Annual testing and evaluation of one or more areas of the district's internal controls.
- Preparation of reports which analyze significant risk assessment findings.
- Recommended changes for strengthening controls and reducing identified risk; and specifying time frames for implementation of such recommendations.

Pursuant to Section 170.12 – Regulations of the Commissioner of Education - School District Financial Accountability, each school district must prepare a corrective action plan, approved by the Board of Education in response to findings to final reports issued by the internal auditor. This plan should include expected dates of implementation and should be filed with the New York State Education Department.

INTERNAL AUDIT OBJECTIVES

The objectives of our engagement are as follows:

- Develop an understanding of the critical business processes of the District within each functional area.
- Identify key risks based on the understanding of the business processes and stated business rules.
- Identify stated controls that are currently in place to address those risks and ascertain if they are operating effectively.
- Recommend improvements in internal controls.

School District
Initial Risk Assessment
As of December 2021

SCOPE AND METHODOLOGY

The Board of Education has engaged Nawrocki Smith LLP as the District's internal auditor as of October 2021. In compliance with New York State Laws, we have performed a risk assessment with respect to policies, procedures, and internal controls pertaining to the District's financial operations. Our risk assessment was performed in order to assess risk areas within the District and to determine an internal audit plan for the fiscal year 2021/2022 and thereafter. This risk assessment will be updated annually to reflect any changes in the current risk environment and the existing internal audit plan.

Our risk assessment consisted of the following methodology:

- Perform interviews of Administration and other appropriate personnel.
- Document procedures within key Functional Areas.
- Identify key controls and perform audit tests of those controls.
- Assess the effectiveness of the key controls.
- Identification and review of organization structure.
- Analysis of risks that are a threat to the achievement of objectives.
- Create a risk profile and internal audit plan.

In addition to the above procedures, we have also evaluated and considered the following within our overall risk assessment:

- District policies and procedures.
- Recent focus of State Comptroller Audits.
- Board of Education/Audit Committee Meetings.
- Materiality to Financial Statements.
- Changes in management or key personnel.
- Financial reports provided to the Board.
- External auditor management letters.
- District corrective action plans.
- Organizational chart and job descriptions.

School District
Initial Risk Assessment
As of December 2021

INTERNAL AUDIT INITIAL RISK ASSESSMENT SUMMARY

We have analyzed twenty-one (21) Business Process areas within the District and have developed an internal audit plan based upon our initial assessment of each area. Each of the twenty-one (21) Business Processes contains multiple business process categories for which an extensive cycle analysis will be performed during the proposed time period noted within the risk rating and internal audit plan. The plan as presented will be revised each year based upon an annual risk assessment update and events/requests which impact the priority of future internal audit services.

The results of our initial risk assessment are summarized below and, in the tables presented on pages 5 through 7. We have utilized a “Low,” “Moderate,” and “High” control risk rating assessment scale:

CURRENT YEAR RATINGS

<u>Rating</u>	<u>2021/2022</u>
High	2 2.17%
Moderate	20 21.74%
Low	70 76.09%
Total	92 100.00%

() Refer to pages 5 through 7 for business process rating changes.*

Our December 2021 initial risk assessment contains five (5) recommendations, as follows:

<u>Business Process</u>	<u>Recommendation(s)</u>
Purchasing & Related Expenditures	1
Benefits	1
Human Resources	1
Fixed Assets	1
Extraclassroom Activity	1
Total	5

Based on work performed and conversation with the District, we have summarized below the internal audit plan for fiscal year 2021/2022:

<u>Cycle Review & Training</u>	<u>Other 2021/2022 Planned Internal Audit Services</u>
<ul style="list-style-type: none">• Revenue & Cash Management	<ul style="list-style-type: none">• External Audit Corrective Action Plan Monitoring
<ul style="list-style-type: none">• ECAF Training-Webinar	<ul style="list-style-type: none">• Annual Risk Assessment Update as of December 2022
	<ul style="list-style-type: none">• Other Services at the request of the District/BOE

School District
Initial Risk Assessment
As of December 2021

Risk Rating and Internal Audit Plan

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

X = Proposed Business Cycle Review
T = Proposed Key Control Testing

	Business Process	Business Process Categories	RISK		YEAR OF SERVICE	
			Inherent	Control	21-22	Subsequent
				21-22		
1	Governance and Planning	1 Governance Environment	H	H		
		2 Control Environment / Policies & Proc.	H	M		
2	Budget Development	3 Budget Development	H	M		
		4 Budget Monitoring & Reporting	H	M		
3	Accounting & Reporting	5 Financial Accounting and Reporting	H	M		X
		6 External/Internal/Claims Auditing	H	L		X
		7 Fund Balance Management	H	L		X
4	Revenue and Cash Management	8 Real Property Tax	M	L	X	
		9 State Aid	H	L	X	
		10 Out of District Tuition/Reimb. Exp.	M	L	X	
		11 Use of Facilities	L	L	X	
		12 Donations	M	L	X	
		13 Vending Machines	H	L	X	
		14 Cash Receipts	H	M	X	
		15 Cash & Investment Management	H	M	X	
		16 Petty Cash	L	L	X	
		17 Bank Reconciliations	H	M	X	
		18 Online Banking	H	L	X	
		19 Accounts Receivable	H	M	X	
5	Grants	20 General Processing	H	L		X
		21 Grant Application	M	L		X
		22 Allowable Costs & Expenditures	H	L		X
		23 Monitoring	M	L		X
		24 Reporting	H	L		X
6	Payroll	25 Payroll Disbursements	H	L		X
		26 Overtime Reporting	H	L		X
		27 Payroll Accounting & Reporting	H	L		X
		28 Payroll Tax Filings	H	L		X
		29 Payroll Reconciliation	H	L		X
7	Human Resources	30 Employment Requisition/Hiring	H	L		X
		31 Personnel Evaluation	H	L		X
		32 Termination	H	L		X
		33 Employee Attendance	H	L		X

School District
Initial Risk Assessment
As of December 2021

Risk Rating and Internal Audit Plan (Continued)

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

X = Proposed Business Cycle Review
T = Proposed Key Control Testing

	Business Process	Business Process Categories	RISK		YEAR OF SERVICE	
			Inherent	Control	21-22	Subsequent
				21-22		
8	Benefits	34 Eligibility	H	L		X
		35 Benefit Calculations	H	L		X
		36 Patient Protection & Affordable Care Act	H	L		X
		37 Retiree Benefits	H	L		X
		38 ERS/TRS	H	L		X
9	Purchasing and Related Expenditures	39 PO System & Vendor Database	H	M		X
		40 Purchasing Process	H	L		X
		41 Payment Processing	H	M		X
		42 Employee Reimbursements	H	L		X
		43 Credit Cards	H	L		X
10	Facilities Maintenance	44 Facilities Maintenance/Work Orders	H	L		X
		45 Staff Supervision	M	L		X
		46 Preventive Maintenance	M	L		X
		47 Coordination with Outside Vendors	M	L		X
11	Capital Projects	48 Construction Planning & Monitoring	H	L		X
		49 Capital Project Funding & Payments	M	L		X
		50 Recordkeeping & Reporting	M	M		X
12	Fixed Assets	51 Inventory/ Capitalization Policy	H	L		X
		52 Acquisition and Disposal	H	M		X
		53 Inventory Process & Recordkeeping	H	H		X
13	Food Service	54 Sales Cycle and System	M	L		X
		55 Inventory and Purchasing	M	L		X
		56 Free & Reduced Meals	M	L		X
		57 Federal and State Reimbursement	H	L		X
		58 Financial Reporting & Monitoring	H	L		X
14	Extraclassroom Activity Fund	59 General Controls	H	M		X
		60 Revenue	H	M		X
		61 Expenditures	M	L		X
		62 Reporting	M	M		X

School District
Initial Risk Assessment
As of December 2021

Risk Rating and Internal Audit Plan (Continued)

√ = Internal Audit Services Provided
★ = Business Cycle Review Complete

X = Proposed Business Cycle Review
T = Proposed Key Control Testing

	Business Process	Business Process Categories	RISK		YEAR OF SERVICE	
			Inherent	Control	21-22	Subsequent
15	Information System	63 Governance	H	L		X
		64 Inventory	H	L		X
		65 Network Security	H	L		X
		66 Application Security	H	L		X
		67 Physical Security	H	L		X
		68 Disaster Recovery	H	L		X
16	Cybersecurity	69 General Controls	H	M		X
		70 Information & Asset Security	H	M		X
		71 Vulnerability Assessment	H	M		X
		72 Incident Response & Recovery	H	L		X
17	Student Data Management	73 Registration & Enrolment	H	L		X
		74 Student Attendance	H	L		X
		75 Student Performance	H	M		X
		76 Student Eligibility	H	L		X
18	Pupil Personnel Services	77 Budgeting and Planning	H	L		X
		78 STAC Reimbursement	H	M		X
		79 Medicaid Reimbursement	H	L		X
		80 RFP and Contracts	H	L		X
19	Transportation	81 Fleet Inventory and Maintenance	H	L		X
		82 Bus Routing and Planning	H	L		X
		83 Labor and Supervision	H	L		X
		84 Contract Management	H	L		X
		85 Federal and State Reimbursement	H	L		X
20	Safety & Security	86 Plan Development & Strategy	H	L		X
		87 Building Access & Security System	H	L		X
		88 Compliance and Incident Reporting	H	L		X
		89 Safety & Security Monitoring	H	L		X
21	Insurance / Risk Management	90 General	H	L		X
		91 Policy Management	H	L		X
		92 Claims Reporting	H	L		X

School District
Initial Risk Assessment
As of December 2021

Inherent Risk - Inherent risk pertains to the overall school district industry. Inherent risk is the risk of a material misstatement that may occur assuming the absence of internal controls.

Control Risk - Control risk pertains specifically to the School District. Control risk is the risk that a material misstatement will not be detected and corrected by Management's internal controls on a timely basis.

RISK ASSESSMENT OBSERVATIONS AND RECOMMENDATIONS

Current Year Observations and Recommendations

Human Resources

1. Although all District employees are subject to annual evaluations of their performance, it was represented that the evaluations are not included in the employee's personnel file in a consistent manner.
 - *Employee evaluations are used as a tool by Administrators to identify employees' strengths and weaknesses, document personnel decisions (including promotions, layoffs and transfers), and to meet legal requirements. The District should continue its efforts to evaluate the employees on an annual basis to adhere to the respective employee bargaining unit agreement or contract. The District should include all employee evaluations in their respective employee personnel files.*

Benefits

2. We conducted key control testing in the area of benefit calculations and noted certain employee benefits files did not have the documentation such as marriage certificates, birth certificates, and social security cards, to support the employee's family health coverage. The lack of supporting documentation is a risk for the District as the Benefits Department may apply incorrect coverage and process inaccurate benefit payments.
 - *The Benefits Department should obtain documentation, including marriage certificates, birth certificates, and social security numbers from District employees to support their insurance coverage elections prior to transmitting any changes in benefits to the insurance carriers.*

Purchasing and Related Expenditures

3. We conducted key control testing in the area of employee reimbursements and noted a need for improvement in the policies and procedures in maintaining documentation supporting the employee's attendance at conferences.
 - *The District should consider updating its Policy 6830 – Employee Reimbursement to provide for employees to submit to the Accounts Payable Department certificates of attendance or other contemporaneous documentation supporting the employees' attendance at conferences. This will enhance the District's controls over employee reimbursements by ensuring that the required documentation is provided and reviewed prior to the payment processing.*

School District
Initial Risk Assessment
As of December 2021

Fixed Assets

4. We conducted key control testing in the area of fixed assets including tracing assets from the property ledger to their respective location and vouching assets from the building level to the District's property ledger. We also observed the District's annual fixed asset inventory process was conducted by its third-party consultant. Based on our analysis, we noted that certain fixed assets could not be located at the location reported on the District's property ledger. A similar observation was noted by the third-party consultant and that the District is in the process of reconciling the missing items.
- *The District should continue its efforts to reconcile the property ledger to the third-party consultant inventory observations and document the circumstances which resulted in those items being marked missing. The District should assign an employee separate from the Information Technology Department (Inventory Control) to conduct walk-through observations and verify whether the fixed asset tags are properly affixed to newly acquired equipment. As an alternative Nawrocki Smith can perform this observation on behalf of the District. The observation function should be conducted on an annual basis during the month of March and the results should be documented and communicated to the Information Technology Department (Inventory Control). Any exceptions should be investigated and corrective action should be implemented in a timely manner.*

Extraclassroom Activity Fund

5. The audit report from the Inspector General indicates that there is a need for improved controls over the extraclassroom activity fund area including a need for awareness of Club Advisors to follow the required procedures and for Advisors to ensure students to utilize the standardized forms in a consistent manner indicating their involvement when the transactions are processed.
- *The District should consider reviewing and updating, where needed, the District's extraclassroom activity training and guidance pertaining to the process of student involvement and attendance in fundraising, deposits, disbursements, sales tax, and accounting procedures.*

Status of Prior Year Recommendations

Transportation

- 1-The Transportation Department is in the process of developing documented guidelines pertaining to transportation planning, administering, purchasing, contracting, routing, and accounting and reporting of transportation services.
- *The Transportation Department should continue its efforts in finalizing the documented guidelines pertaining to transportation planning, administering, purchasing, contracting, routing, and accounting and reporting of transportation services. The documented procedures should be reviewed and updated annually to maintain relevance and reflect regular changes in the Transportation Department. Nawrocki Smith provided the District with narratives in this regard that should serve as a supplement to the existing and draft transportation guidelines.*

Status - Complete

School District
Initial Risk Assessment
As of December 2021

2-We selected a random sample of bus drivers from the District's transportation bus companies and analyzed the contents of their DMV 19A files. Certain documentation was not maintained by the bus companies to support their compliance with the DMV bus driver 19A file requirements. In addition, the Transportation Department does not receive an annual update of bus driver listing or abstracts from the transportation vendors. The Transportation Department does not actively perform spot checks of the vendors' bus driver abstracts to ensure compliance with DMV 19A file requirements.

- ***The Transportation Department should obtain confirmation from each vendor that all drivers currently transporting students are in compliance with 19A requirements. The Transportation Department should also request from its transportation vendors at the beginning of each school year updates of their bus driver listings and abstracts. The Transportation Department should also consider requesting from its transportation vendors complete copies of a sample of bus driver DMV 19A files and perform spot checks of their files to ensure compliance with DMV 19A requirements.***

Status – In Process

3-We selected a random sample of bus monitors employed by the District during the fiscal year 2017/2018 and analyzed the contents of their employee files. Based upon our analysis, we noted that certain bus monitor documentation such as CPR certifications, pre-service training, refresher training and/or physical performance test forms were not maintained in a consistent manner by the Transportation Department.

- ***The Transportation Department should maintain evidence of CPR, pre-service and refresher course training certifications, and physical performance evaluation results for all bus monitors on file. The Transportation Department should also maintain a bus monitor file checklist to review and verify the existence of the aforementioned documents.***

Status - Complete

4-We selected a random sample of buses to assess whether the associated transportation bus companies utilized by the District complied with the New York State Education Department requirement to perform three (3) bus drills during the fiscal year 2017/2018. Based on our analysis, we noted that the Transportation Department did not maintain supporting documentation or annual certification reports indicating that the transportation vendors complied with this requirement.

- ***According to the New York State Education Law Section 3623, the Transportation Department and the contracted bus companies should perform a minimum of three (3) drills to be held on each school bus during the school year, the first to be conducted during the first seven days of school, the second between November 1st and December 31st and the third between March 1st and April 30th. These drills should not be conducted when buses are on routes. The Transportation Department should certify on the annual report to the State Education Department that the District has complied with this subdivision.***

Status - Complete

School District
Initial Risk Assessment
As of December 2021

Cybersecurity

5-The Information Technology Department has not developed anti-encryption mechanism of emails.

- *The Information Technology Department should develop controls to encrypt and/or password protect information that flows in and out of the system through emails. Encryption provides another level of security for the data in case someone gains access to the email. Since the data is encrypted or password protected, the information may be inaccessible to unauthorized use.*

Status - Complete

6- Although the District has a Board approved policy, the District has not developed a formal training regarding cybersecurity, phishing email, social engineering, protecting personally identifiable information, and social media guidelines and related risks or how to deal with related incidents.

- *The District should develop and provide periodic cybersecurity awareness training for all employees including new hires, Information Technology Department, and job positions that handle PII. The training should explain the proper rules of behavior for using information technology systems, the insider type of threats from a cybersecurity perspective, and the implications of a cybersecurity breach. The training should also include guidance on use of social media, Bring Your Own Device (“BYOD”), and how to respond to a phishing or ransomware attacks.*

Status - Complete

7-We noted that the District does not actively monitor its network systems for intrusion vulnerabilities or other alerts in respect to the District’s network security configurations.

- *The Information Technology department should develop an intrusion detection system (IDS) to inspect all inbound and outbound network activity and identify suspicious patterns that may indicate a network or system attack from someone attempting to break into or compromise the District’s network. By reviewing the recorded activity and any potential intruders into the network, the Information Technology Department will be able to determine if the firewall or IDS settings will indicate potential attacks or other problems that need to be addressed.*

Status – In Process



EXHIBIT 6

Sample Internal Audit Cycle Report



Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date



Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

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Scope of Engagement

Pursuant to the request of the Organization’s Board of Education and in accordance with the internal audit plan outlined within the Organization’s Risk Assessment Update, we have reviewed the policies, procedures, and internal controls pertaining to the District’s Human Resources Cycle. This internal audit report pertains to the fiscal year.

The objective of our analysis was to determine whether the internal controls pertaining to the District’s human resources procedures are adequate and that duties are properly performed, thus safeguarding the District’s assets.

Work Performed

Our analysis consisted of the following:

1. Requested the following documents from the District, including:
 - a. Board of Education policies pertaining to the District’s Human Resources operations.
 - b. Standardized forms utilized by the Human Resources Department.
 - c. Employee job descriptions.

Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

- d. Employee listing applicable to active employees generated from the financial application, indicating employment status, appointment, hire date, and teacher credentials.
 - e. Employee certification list and employee seniority list.
 - f. Employee evaluations for the fiscal year 2023/2024.
 - g. List of employees who had a column salary increase during the fiscal year 2023/2024.
 - h. Personnel documents and files for select employees.
2. Performed initial planning and interviews with the Assistant Superintendent for Business, Assistant Superintendent for Human Resources, Human Resources Account Clerk, and building principals involved in the Human Resources Cycle. During our meetings, we had the opportunity to make direct inquiries regarding transactional records, supporting documents, and reporting. The purpose of these interviews was to obtain knowledge as to each individual's job duties and involvement as they pertain to the human resources processes, day-to-day responsibilities, who they report to, and who they supervise.
 3. Assessed the District's internal controls, including control effectiveness, performance, and efficiencies. Assessed possible improvements pertaining to the internal controls of the Human Resources Cycle. Such recommendations are presented within each applicable section of the report.
 4. Prepared an analysis and report. An audit exit conference was held on (date) with the Assistant Superintendent for Human Resources and the Assistant Superintendent for Business. Findings and recommendations contained in this report were discussed with those attending.

Assessment of Human Resources Procedures

The agreed-upon scope of the District's Human Resources Cycle is organized into the following six (6) distinct categories. We have reviewed and tested each categorical procedure during the course of our audit, based on the documentation provided to us. We have documented the human resources processes through flowcharts and narratives for each categorical procedure within Exhibits 1 through 7.

- ***General Organization Structure & Policies***
- ***Employee Requisition and Hiring Procedures***
- ***Recordkeeping Procedures***
- ***Attendance Procedures***
- ***Evaluation Procedures***
- ***Retirement and Resignation Procedures***

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Date

General Organizational Structure & Policies (Exhibits 1 & 2)

The attached Exhibits 1 and 2 summarize the organizational structure and policies applicable to the District's Human Resources function. We have made the following observations and recommendations:

The following processes are currently carried out by each Party:

Party	Function
Board of Education	Adopts policies. Approves appointments and terminations. Enters into employee bargaining unit agreements/individual contracts.
Superintendent of Schools	Evaluates the District's staffing needs with Cabinet Members, Principals, and Directors/Department Heads. Conducts interviews for candidates for select positions within the District. Makes offers to candidates and recommends appointments to the Board of Education.
Director of Human Resources	Evaluates the District's staffing needs with fellow Cabinet Members, Principals, and Directors/Department Heads. Reviews and updates District policies and procedures related to the human resources function. Meets with candidates for all District positions. Coordinates negotiations for employee bargaining unit agreements and individual contracts. Reviews and approves requests, and administers according to employee bargaining unit agreements and individual contracts. Prepares and distributes personnel agenda to the Board of Education.
Principals and Directors/Department Heads	Discuss the District's staffing needs, including vacant positions, with the Central Administrators. Coordinate and administer the candidate interview process within their respective building or department. Conduct employee evaluations as outlined in the employee bargaining unit agreements or individual contracts. Review and approve employee attendance requests and monitor staffing within their building or department.
Human Resources Department	Advertises new vacant positions internally and externally through various media tools. Conducts screening procedures including fingerprint clearance check, I-9 Form, review of driver's license, and certifications. Provides employees with a District onboarding packet including Board of Education policies, human resources, benefits, and payroll forms and information. Creates and maintains an employee file and enters employee information and demographics into the financial application. Notifies the Payroll Office of hiring or changes in employee status, as well as the termination of employees, via a form and the Board of Education agenda. Updates employee information and demographics in the financial application, as needed. Prepares personnel agenda for the Human Resources Director to review and present.
Payroll Department	Maintains payroll related documents and files. Enters payroll related data, including deduction information, into the financial application. Receives employee attendance information and tracks and records attendance balances on attendance cards and in the financial application. Prepares separation/retirement payout calculations based on bargaining unit agreements/individual contracts for employees who leave the District.

Observation/Recommendation #1

Risk Rating: Moderate

Several District policies have not been updated in recent years. In some cases, policies reference outdated systems, organizational structures, or regulations that are no longer applicable. The lack of timely updates may lead to inconsistent practices among staff regarding roles, responsibilities, and procedures.

- ***The District should update its outdated human resources policies. This review should involve relevant departments and, where appropriate, legal counsel to ensure accuracy, compliance, and alignment with current best practices.***

Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

Observation/Recommendation #2

Risk Rating: Moderate

The District does not maintain a centralized employee handbook. In the absence of a formal handbook, employees rely on collective bargaining agreements, the District website, and internal forms for guidance on policies and procedures. While union contracts provide key employment terms for represented staff, the lack of a consolidated reference document may result in inconsistent communication of expectations, practices, and benefits.

- ***The Human Resources Department should develop and implement an employee handbook that serves as a centralized resource, outlining general policies, expectations, and procedures applicable to all employees. The handbook should address topics such as code of conduct, leave policies, workplace expectations, anti-discrimination policies, technology use, and procedures for reporting concerns. Establishing a standardized handbook would support consistent policy application and serve as a useful reference during onboarding and throughout employment. The employee handbook should be reviewed periodically and updated in consultation with legal counsel to ensure alignment with applicable laws and contractual provisions.***

Employee Requisition and Hiring Procedures (Exhibit 3)

The attached Exhibit 3 summarizes the employee requisition and hiring procedures. We have made the following observations and recommendations:

During budget planning, the cabinet reviews staffing requests, evaluates new position needs, and tracks them in a centralized spreadsheet. Once approved, vacancies are posted on OLAS and the District's website. Building principals conduct interviews for school-based positions, while the Human Resources Director interviews administrative candidates. Principals form committees, select finalists, and submit them to the Human Resources Director, who issues a commitment letter. Prior to final interviews, the Human Resources Department verifies certification, conducts fingerprint clearance checks, and completes reference checks. Upon acceptance, the Human Resources Department coordinates onboarding, and appointments are approved at the next Board meeting. Finalized appointments are shared with payroll and principals, and a commencement letter is issued.

- ***No recommendations at this time.***

Recordkeeping Procedures (Exhibit 4)

The attached Exhibit 4 summarizes the recordkeeping procedures. We have made the following observations and recommendations:

Personnel Files

Employees receive an onboarding packet during orientation that contains personnel, payroll, and benefits forms.

The Human Resources Department maintains an "Employee Checklist" to verify the existence of the above documents within the employee's personnel file.

Observation/Recommendation #3

Risk Rating: High

We selected a random sample of ten (10) employees to verify that the required personnel records were maintained on file. We have summarized below the number of instances where personnel files did not include employee related documentation:

Missing Documents	Findings
BOE Approval Minutes	5
Application	6
Resume	5
References	6
Interview Evaluation	10
Physical Exam	8
Transcripts	6
ERS/TRS Form	10
Form W4	10
Form I9	5
Related Party Disclosure Form	10
Fingerprint Clearance	5
Oath of Allegiance	6
Salary Notice	5

The Human Resources Department should utilize its personnel file checklist to confirm that supporting documents are obtained, verified, and filed upon hire. The Human Resources Department should perform periodic audits of personnel files and reconcile missing items. Where possible, digitizing and centralizing personnel records using secure document management tools can further improve record retention and accessibility.

Personnel Data Entry

Based on onboarding documentation and Board of Education minutes, the Human Resources Department inputs personnel data into WinCap, including name, address, position, certification, tenure, employment status, and start and termination dates. The Payroll Department is notified of new hires, status changes, and terminations through the Board agenda and updates payroll deductions, benefit elections, and tax withholding information in WinCap.

Observation/Recommendation #4

Risk Rating: Moderate

Although the Human Resources Department assigns employees to buildings within WinCap, there is no formal documented process to track staff transfers between buildings. Changes in assignments are identified informally during meetings or through email communications. This lack of a centralized notification or approval process hinders the accuracy of position control records.

- ***The Human Resources should implement a formalized staff transfer process, including a standardized Personnel Action or Change Form, to be completed and approved by relevant administrators prior to any building reassignment. This form should be submitted to the Human Resources Department to ensure timely updates to WinCap and accurate maintenance of position control records.***

Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

Employee Certifications

The Human Resources Department has implemented a process to track teaching certifications within the financial application and cross-reference them with the current certifications in employee personnel files.

Observation/Recommendation #5

Risk Rating: Moderate

We selected a random sample of ten (10) employees to verify their credentials. Based on our analysis, we noted the following:

- One instance where the certificate expiration date could not be verified.
 - One instance where the certificate had expired and no updated documentation was on file.
 - One instance where the personnel file did not contain the employee's certificate.
- ***The Human Resource Department should maintain complete, accurate, and up-to-date certification documents within an employee's personnel file. Following the hiring process, the Human Resources Department should designate an employee to review the certification information for accuracy and completeness. The review process should be documented, and any discrepancies should be communicated to the Human Resources Director. This will assist the Human Resources Department in confirming that the employee certifications are accurate and whether the District employees are in compliance with the New York State Education requirements reargding their required degree, coursework, assessment, and experience requirements.***

User Permissions

The District Treasurer is responsible for granting employees access to the financial application, including the human resources module, upon written approval from the Human Resources Director and the Assistant Superintendent for Business, based on their applicable job responsibilities. Based on our analysis of the user permission report, we confirmed that the user's access to the Human Resources Director and Human Resources Account Clerk was applicable to their job duties. No exceptions were noted.

- ***No recommendations at this time.***

Attendance Procedures (Exhibit 5)

The attached Exhibit 5 summarizes the employee attendance procedures. We have made the following observations and recommendations:

Instructional staff report sick and personal leave through Frontline Absence Management, which also assigns substitutes and transfers data to WinCap during payroll processing. Personal and consecutive leave requests require additional approval and must be submitted via paper forms to the Human Resources Department. The Payroll Department enters final attendance data and monitors leave balances on a bi-weekly basis to identify unpaid leave or insufficient accruals.

Custodial, hourly, and per-diem employees submit signed timesheets, which are reviewed by department heads. The Human Resources Department and Payroll Department reconcile attendance data.

Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

We were not provided with the requested employee absence report to select a sample and confirm the reported absences in the financial application for the period of July 2024 through the present. Due to the limited information available, we were unable to complete the planned testing procedures. At the District's request and upon receipt of the requested documentation, a supplemental report may be issued in this regard.

Observation/Recommendation #6

Risk Rating: Moderate

The District does not utilize time clocks or a standardized, system-wide sign-in and sign-out process to track daily employee attendance. While some buildings use informal tools such as "Out-of-Building" logs or early departure slips, these practices are inconsistent, not centrally documented, and are not submitted to the Human Resources Department.

- ***The Human Resources Department should implement a standardized attendance tracking protocol across all buildings, such as a centralized digital sign-in/out system or formalized daily attendance logs. Building secretaries should be required to maintain and submit a daily record of absences to the Human Resources Department, reconciling these absences with leave request forms and the WinCap system.***

Observation/Recommendation #7

Risk Rating: High

It was represented that the Human Resources Department records Family and Medical Leave Act (FMLA) absences in WinCap under the "sick" leave category. Additionally, the Human Resources Department manually ends and reactivates employee positions in the system, which creates risks of inconsistencies in employee status, inaccurate leave accrual balances, and inaccurate seniority tracking.

- ***The Human Resources Department should implement a standardized coding system in WinCap to separately classify FMLA-designated leave from general sick leave. This will assist the District in maintaining accurate sick leave accrual balances and supporting proper reporting of employee status and seniority.***

Evaluation Procedures (Exhibit 6)

The attached Exhibit 6 summarizes the employee evaluation procedures. We have made the following observations and recommendations:

The District has formal policies and bargaining unit agreements that describe the purpose and process of evaluating employees' performance. The District's policies follow the New York State Education Department evaluation guidelines for instructional employees (Annual Professional Performance Review). All administrative staff members are required to undergo formal annual evaluations.

We selected a random sample of ten (10) employees to assess whether their evaluations were properly supported and documented during the fiscal year 2023/2024. We were not provided with the requested supporting documentation to confirm that the employee evaluations were in accordance with bargaining unit agreements and New York State Education Department guidelines. Due to the limited information available, we were unable to complete the planned testing procedures. At the District's request and upon receipt of the requested documentation, a supplemental report may be issued in this regard.

Organization

Report on Internal Controls Pertaining to the Human Resources Cycle

Date

We selected a random sample of ten (10) employees to assess whether their step level increases were properly supported and documented during the fiscal year 2023/2024. We were not provided with the requested supporting documentation to confirm that the employee step level increases were in accordance with bargaining unit agreements. Due to the limited information available, we were unable to complete the planned testing procedures. At the District's request and upon receipt of the requested documentation, a supplemental report may be issued in this regard.

Retirement/Separation Procedures (Exhibit 7)

The attached Exhibit 7 summarizes the employee retirement and separation procedures. We have made the following observations:

Employees submit their request for retirement/separation from the District in writing via a personal letter or standard form. These requests are subject to a formal approval process by the Superintendent of Schools and the Board of Education. The Human Resources Department is responsible for updating the employee's status to "Inactive" in the financial system upon receiving internal notification. For retirees, the Human Resources Department calculates the number of unused leave days eligible for payout in accordance with contract terms. Based on the information provided by the Human Resources Department, the Payroll Department processes the final payout. The District Treasurer is responsible for verifying the financial accuracy of the payout.

We were not provided with the requested inactive employee listing for the fiscal year 2023/2024 to select a sample and confirm that the employee terminations and payouts were performed in accordance with bargaining unit agreements. Due to the limited information available, we were unable to complete the planned testing procedures. At the District's request and upon receipt of the requested documentation, a supplemental report may be issued in this regard.

Observation/Recommendation #8

Risk Rating: Moderate

The Human Resource Department does not utilize an exit checklist when employees terminate or leave the District.

- ***The Human Resource Department should consider developing an exit checklist for employees who are terminated or leave the District. The District should utilize the exit checklist to document that all property in the employee's custody, including but not limited to laptops, badges, keys, cell phones, etc., has been returned. The exit checklist will help the District follow consistent procedures when terminating employees from the District's financial and other applications.***

Risk Rating and Opinion

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Date

Inherent Risk Rating: High

Control Risk Rating: Moderate (Organization)

Audit Opinion: Needs Improvement

Audit Comment: The District's human resources procedures and related controls need improvement. The recommendations noted above are aimed at improving the effectiveness of the recordkeeping, attendance, evaluation procedures, and the related responsibilities and controls within the Human Resources Department.

Exhibits

Exhibit 1 Flowchart of Human Resources Organizational Structure

Exhibit 2 Analysis of Human Resources General Governance Controls

Exhibit 3 Narratives of Human Resources Recruitment and Hiring Procedures

Exhibit 4 Narratives of Human Resources Recordkeeping Procedures

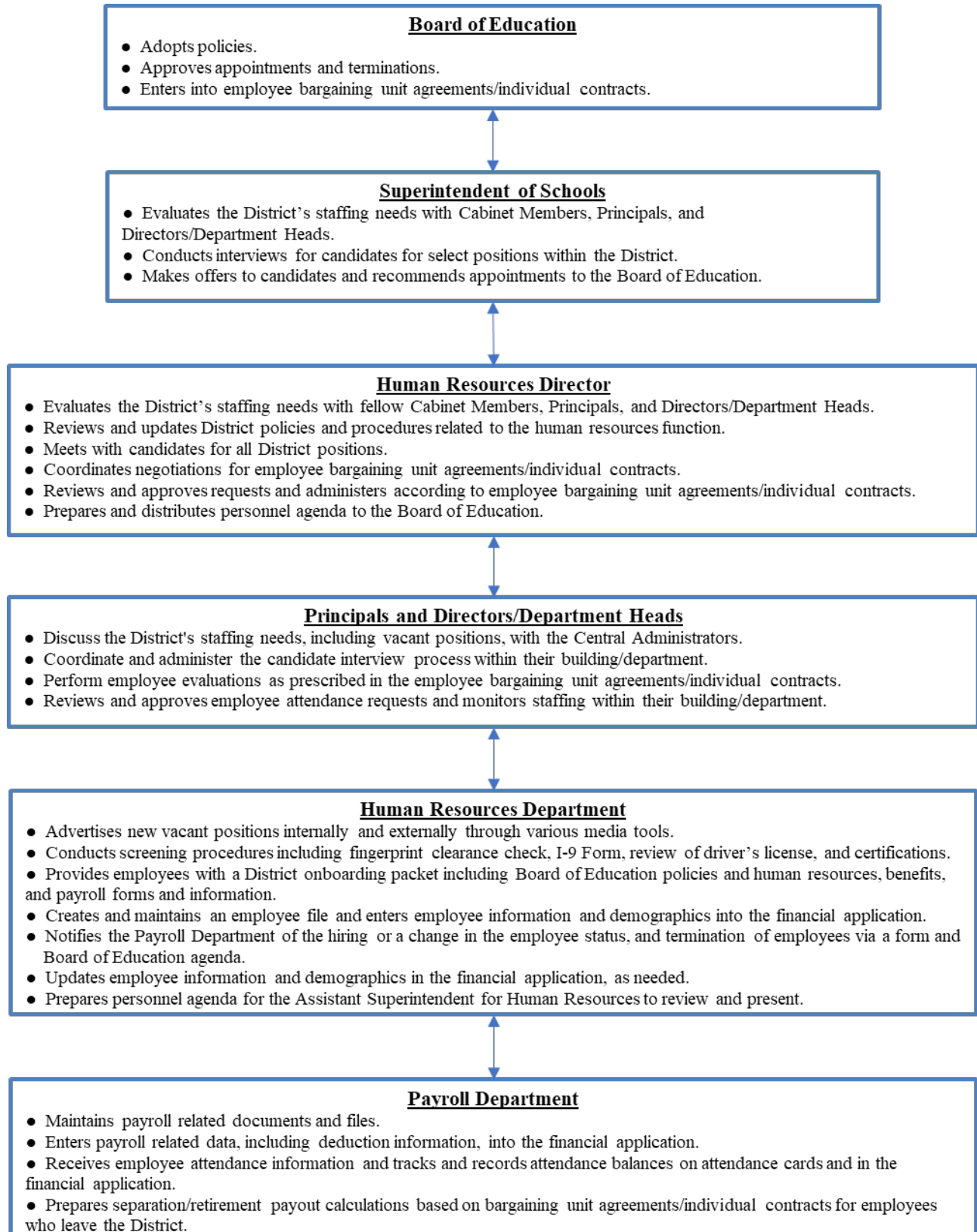
Exhibit 5 Narratives of Employee Attendance Procedures

Exhibit 6 Narratives of Employee Evaluation Procedures

Exhibit 7 Narratives of Employee Retirement/Termination Procedures

Please contact our Hauppauge, New York office @ 631-756-9500 should you have any questions in this regard.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Flowchart of Human Resources Organizational Structure
Exhibit 1



Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Analysis of General Governance Controls
Exhibit 2

The District has the following Board of Education approved policies, which provide guidance and outline specific procedures for the human resources function:

- a. Policy # 9000 – Personnel Policy Goals
- b. Policy # 9110.2 – Prevention of Sexual Harassment of Employees
- c. Policy # 9110.4 – Employees with HIV- Related Illness
- d. Policy # 9120.1 – Conflict of Interest
- e. Policy # 9140.1 - Staff Complaints and Grievances
- f. Policy # 9240 – Recruitment and Selection
- g. Policy #9260 – Conditional Appointment and Emergency Conditional Appointment – Student Safety
- h. Policy # 9320 - Drug-Free Workplace
- i. Policy # 9420 - Assignments and Transfers
- j. Policy # 9500 – Compensation and Benefits
- k. Policy # 9520.2 – Family and Medical Leave
- l. Policy # 9645 – Disclosure of Wrongful Conduct
- m. Policy #9700 – Staff Development

Job Descriptions

The Human Resources maintains job descriptions in a central binder, including civil service titles and administrative roles.

Employee Handbooks

The Human Resources Department does not maintain a centralized handbook. The Human Resources Department relies on collective bargaining agreements and information and forms posted on the District's website for guidance.

Forms

The Human Resources Department has developed the following employee requisition forms:

- Job Posting Form
- Interview Process Guide
- Confidentiality Statements
- Interview Notes Form – Administrative Feedback Form
- Recommendation Form

The Human Resources Department has developed the following employee onboarding packet:

- New Hire Checklist
- New Hire Information Sheet
- Constitutional Oath of Office Form
- Physical Examination Report
- Direct Deposit Authorization
- Form W4 – Employee's Withholding Certificate
- Employment Eligibility Verification

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Analysis of General Governance Controls
Exhibit 2

- OMNI 403(b) Salary Deduction Agreement Form
- NYS TRS/ERS Application for Membership
- Network Security Form
- Employee Acceptable Use Policy Acknowledgment Form
- Copies of Board of Education Policies
- NYS – Department of Civil Service – Employee Benefits Division Health Insurance Transaction Form
- Dental Enrollment/ Change Form
- Aflac Enrollment Form
- Life Insurance Enrollment Form
- Health Insurance Waiver Form
- Health Insurance Marketplace Coverage Notice

The Human Resources Department has developed the following employee attendance forms:

- Personal Day Form
- Request for Paid Leave Time for Cancer Screening
- Request for Family Medical Leave

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Human Resources Employment Requisition and Hiring Procedures
Exhibit 3

Principals submit a formal request form to the Human Resources Department to fill the vacancy. During the budget planning season, the cabinet reviews all staffing requests, including new positions, potential replacements for retirements, and maintains a tracking spreadsheet. The cabinet also evaluates the need for any new positions. For instructional staff, positions are determined based on enrollment trends, new program initiatives, and funding availability. Once approved, the position is posted on the Online Application System (OLAS) and the District's website.

Applications and resumes are submitted and sorted electronically through OLAS by credentials, subject area, and qualifications. The Human Resources Department may forward relevant applications (e.g., for substitutes or teaching assistants) directly to schools based on current needs. Candidates are not notified upon receipt of their application through OLAS, but they are contacted if they are not selected after an interview.

The responsibility for conducting candidate interviews is assigned based on the role being filled. The Human Resources Director is responsible for interviewing administrative candidates, while building principals are responsible for interviewing staff positions within their respective buildings.

Principals retrieve resumes from the OLAS system, establish a building-level committee, and conduct interviews to identify top candidates.

Once finalists are selected, the recommended candidate is presented to the Human Resources Director for review and approval. The Human Resources Director issues a formal commitment letter outlining the position details (salary, start date, probationary period, and board appointment date).

Before the final interview, the Human Resources Department performs the following screening tasks:

- Verification of NYS certification status (available online)
- Fingerprint clearance through NYSED's TEACH system
- Review of reference checks completed by building staff

For non-instructional staff, procedures vary based on civil service classification:

Classification	Procedure
Competitive	The Civil Service list is requested and canvassed. Valid lists (containing three or more interested candidates) are forwarded to principals for interviews. The Human Resources Department extends offers based on selection and contract terms.
Non-Competitive	Positions are recruited via OLAS and internal postings. Minimum qualifications are verified before hiring.
Provisional (No List)	The Human Resources Department advertises externally. Candidates must meet civil service requirements and will be tested when the exam is available.

The District does not utilize temporary employment agencies, except in limited cases such as for special education services (e.g., therapists), which require prior union approval. Temporary employees may also be engaged as substitutes to cover long-term leaves. The District limits the scope of temporary assignments and secures union approval when necessary, thereby avoiding the transfer of union-designated work.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Human Resources Employment Requisition and Hiring Procedures
Exhibit 3

If an applicant is not selected for a position, notification is provided either by the building level or the Human Resources Department, depending on the stage of the selection process.

Upon candidate acceptance, HR staff coordinate onboarding, and the appointment is scheduled for the next available Board of Education agenda.

Once approved by the Board of Education, a copy of the approved Board agenda is forwarded to payroll for processing. Staff members receive a personal action letter, and principals have access to the Board agenda when a candidate is selected for employment. The Human Resources Department notifies the principals and provides them with the commencement letter.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Human Resources Recordkeeping Procedures
Exhibit 4

Employee Personnel Files

During onboarding, employees receive a New Employee Packet that contains payroll and benefits forms, as well as informational items. The new employee meets with the Human Resources Department to complete all required documentation.

The Human Resources Department maintains employee personnel files in alphabetical order. The Human Resources Department maintains separate employee personnel files for contracted staff, distinct from those for substitute and per diem employees. The following documents are within each employee's personnel file:

- a) Application for Employment
- b) Transcripts (if applicable)
- c) Certifications (if applicable)
- d) Observation
- e) Tenure
- f) Confidential Documents
- g) Miscellaneous Correspondence

The Human Resources Department maintains an "Employee Checklist" to verify the existence of the above documents within the employee's personnel file.

The Payroll Department maintains W-4 Forms, Direct Deposit Information, and Health Benefits Forms.

The personnel files are accessible only to those with confidential permission. Employees who want to review their personnel files are required to make an appointment with the Human Resources Department. Employees review their personnel files at the Human Resources Department under the supervision of the Department's staff.

Personnel Data Entry:

Based on the documentation provided by the employee during onboarding and the Board of Education minutes, the Human Resources Department enters the following personnel information into the financial application.

- Name
- Address
- Position
- Status
- Certification Information
- Tenure Information
- Full-Time/Part-Time
- Start/Termination Dates

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Human Resources Recordkeeping Procedures
Exhibit 4

The Human Resources Department notifies the Payroll Department of hiring, changes in employee status, and terminations of employees via a Board of Education agenda. The Payroll Department enters into WinCap the following information:

- Payroll Deductions
- Benefit Elections
- FICA and State Tax Withholding

Employee Certifications

Certified Staff

The Human Resources Department reviews the certification status of Teachers on the NYS TEACH website and requests that they submit a copy of their certificate for their personnel file. The Human Resources Department enters the certification information into the financial application. The Human Resources Department periodically reviews the financial application certification report to identify certifications that expire in the coming months and informs employees of their upcoming certification expiration dates. Upon confirmation of their certificate renewal on NYS TEACH, the Human Resources Department updates the information in the financial application.

Classified/Civil Service Employees:

The only classified Civil Service positions that require proper NYS Certification/License requirements are Security Aide, Physical Therapist, Physical Therapy Assistant, Occupational Therapist, Occupational Therapy Assistant, and Registered Professional School Nurse (RN). The Human Resources Department confirms the current and active certification or license in accordance with the records of the New York State Department of Education's Office of the Professions (OT/PT and Registered Nurse) or the New York State Department of State's Division of Licensing Services (Security Aide). Upon hire, the Human Resources Department submits a copy of the employee's current and active certification or license to the County Department of Human Resources.

User Permissions

The District Treasurer is responsible for granting employees access to the financial application, including the human resources module, based on written approval from the Human Resources Director and the Assistant Superintendent for Business and their applicable job responsibilities.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Employee Attendance Procedures
Exhibit 5

Employee Attendance

The District utilizes the following applications and forms to report and track employee absences:

Type	Method
Sick Leave	Entered directly by the employee in Frontline Absence Management
Personal Leave	Requires additional approval and is entered in both Frontline Absence Management and WinCap Web
Consecutive/Restricted Leave	Submitted via paper form and routed to the Human Resources Department for approval

The District utilizes Frontline Absence Management, a third-party employee attendance service, to record and track instructional employee sick and personal leave days, as well as substitute attendance. Teachers are required to use the website to report their absences, which documents the teachers' absences and identifies the applicable substitute.

Absence entries made in Frontline Absence Management are transferred to WinCap during payroll processing, which occurs on a semi-monthly (biweekly) basis.

Once transferred, the Human Resources Department reviews the attendance data in WinCap and generates reconciliation reports.

Documentation and reconciliation logs are maintained in physical files and binders by the Human Resources Department for audit purposes.

Custodial, hourly, and per-diem employees report their attendance on timesheets. The Department Heads review and sign the timesheets before submitting them to the Payroll Department for payment processing.

Employees also utilize a leave approval form to document their requests and approvals of their absences. They request approval from their immediate Supervisor. The form is forwarded to the Human Resources Department to review and approve.

The Payroll Department enters the employee's attendance into the financial application based on the timesheets and leave approval forms provided by the building-level and the Human Resources Department.

The Payroll Department monitors leave balances bi-weekly and reconciles reports from the financial application to identify employees on leave without pay who have had time docked via the sick pay or personal pay deduct codes, as well as any hourly employees without accrued leave.

The following table summarizes the employee attendance procedures by building level:

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Employee Attendance Procedures
Exhibit 5

Procedure/ Internal Control	School 1	School 2	School 3	School 4	School 5
Employee Documents Daily Attendance	x	x	x	x	x
Designated Employee Responsible for Creating/Maintaining Attendance Records	x	✓	x	✓	x
Designated Employee Responsible for Entering Attendance Records into Financial System	x	x	x	x	x
Employee Requirement to Complete Standardized Leave Request Forms	✓	✓	✓	✓	✓
Absence Management System in Place (e.g., AESOP)	✓	✓	✓	✓	✓
Attendance Records are Periodically Reconciled	x	x	x	✓	x
Supervisory-Level Review of Attendance Records	x	✓	x	✓	x

Employee Leave Accruals

The District follows the employee bargaining unit agreements to determine the number of entitled vacation, personal, and sick leave days and pay rates. The District utilizes the financial application to calculate the annual accruals and roll over the annual entitlement days.

The number of vacation, personal, and sick leave days allocated to each employee is determined based on the terms outlined in the applicable collective bargaining agreements or employment contracts. The Human Resources Department is responsible for reviewing these agreements to ensure that the appropriate leave entitlements are granted in accordance with negotiated terms. Once the leave accruals are determined, Human Resources utilizes the WinCap rollover process to set up and enter the leave balances into the financial application.

Leave balances are communicated to employees through the WinCap Web portal. Employees can log into their accounts to view real-time updates on their available leave balances, including vacation, sick, and personal time.

Administrative employees are not automatically entitled to receive payment for unused time at the end of each school year. Payment for such time, if permitted, is at the discretion of the Superintendent of Schools. If approval is granted, a designated form must be completed and submitted by the employee in accordance with the District's procedures.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Employee Evaluation Procedures
Exhibit 6

Employee Evaluations

The District has contracts and bargaining unit agreements in place that describe the District's purpose and process for evaluating employee performance.

The District follows the Annual Professional Performance Review (APPR) guidelines established by the New York State Education Department for instructional staff evaluations. All contractual employees get evaluated formally and informally throughout the year. Based on bargaining unit agreements, contractual employees are formally evaluated at a minimum of once a year.

The following table summarizes the frequency of performance observations for tenured and non-tenured instructional positions:

Employee Category	Observation Frequency
Tenured	Minimum of 2 Observations per year
Non-Tenured	Minimum of 3 Observations per year

Non-instructional staff, including custodial, buildings and grounds, clerical, cafeteria, and nursing personnel, are evaluated using paper-based forms. Supervisors are responsible for completing these evaluations and forwarding them to the Human Resources department for inclusion in the employee's personnel file. The evaluation frequency for non-instructional employees may vary based on union contracts or internal practices, but is generally conducted on an annual basis unless otherwise specified.

Evaluations are conducted by principals, department clerks, and administrative staff.

Evaluations are reviewed with the employee and include a sign-off process to acknowledge the discussion and receipt of the evaluation.

Employees are given the opportunity to respond to and provide comments on their evaluations.

Employees and the evaluators are required to sign the evaluation forms. The Frontline system is used to monitor and track any missing evaluations for instructional staff.

Staff Development

The District offers professional development opportunities to employees through its Curriculum and Instruction Department, the Teacher Center, and partnerships with BOCES.

The Curriculum and Instruction Department is responsible for coordinating and approving professional development courses, managing workshop logistics, and tracking the completion of hours.

Professional development offerings are provided during the academic year, including Superintendent's Conference Days, as well as through external partners such as Southern Westchester BOCES.

Employee training records and participation are maintained in Frontline's My Learning Plan.

Teachers are required to complete certain professional development programs, including Diversity, Equity, and Inclusion (DEI) or Equity Certification, per contract terms.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Employee Evaluation Procedures
Exhibit 6

Employees seeking to attend external workshops or in-service courses must submit a request via Frontline. Requests are routed to the Curriculum and Instruction team for review and approval.

Once approved and completed, course records are logged in Frontline. When employees apply for salary advancement based on in-service credits, their submissions are reviewed by the Human Resources Department.

The Human Resources Department verifies that no course is used more than once for salary movement by cross-checking completed courses in My Learning Plan before updating records in WinCap.

Organization
Report on Internal Controls Pertaining to the Human Resources Cycle
Narratives of Employee Retirement/Termination Procedures
Exhibit 7

Employees who wish to retire or resign from the District submit a written request to end their employment to their immediate Supervisor and the Human Resources Department.

The Human Resources Department informs the Superintendent of Schools and the Board of Education of the termination or resignation of the employee.

The Board of Education approves and documents the termination or resignation of the employee within the Board Minutes.

The Human Resources Department is responsible for making an employee "Inactive" in the financial system. The Human Resources Department is notified through established internal communication channels when an employee's status requires inactivation, prompting them to update the system accordingly.

For retirements, the Human Resources Department determines the number of unused leave days (e.g., sick or vacation) eligible for payout based on contract terms.

The leave accrual totals are communicated to the Payroll Department, which calculates the final payout.

The District Treasurer verifies the financial accuracy of the payout.