



District's final written response

Date: 6-16-2023

To: Arizona Auditor General

Re: CAVIAT Performance Audit

The CAVIAT Governing Board and District agree with the Auditor General's Performance Audit Findings as outline herein:

Finding 1: During a nearly 4-year period, former coordinator and their family member used District credit card for numerous personal purchases while superintendent did not take timely disciplinary actions

Recommendation 1: The District should ensure its employees comply with District policies and USFR requirements by enforcing existing District policies and cardholder agreements for District card usage. Actions the District should take include disallowing personal purchases, and taking timely, appropriate disciplinary action for noncompliance with card policies, such as recovering public monies; revoking card privileges; and termination.

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

Recommendation 2: The District should ensure its employees comply with District policies and USFR requirements by continuing to implement and adhere to the credit card procedures the Board reviewed and approved in December 2022.

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

Recommendation 3: The District should ensure its employees comply with District policies and USFR requirements by developing and providing periodic training to its employees on District card policies and procedures, USFR requirements, and the appropriate disciplinary actions to be taken when improper use is identified.

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

Finding 2: District's lack of key outcome data prevents it from demonstrating how the \$1.9 million it spent on programs in fiscal year 2021 effectively prepared students for high-need occupations

Recommendation 4: The District should develop and implement consistent data collection protocols for all central and satellite CTE programs. This includes collecting and validating complete data, such as data related to student certifications earned and job placements, as well as developing a process to track all outcome data as required by A.R.S. §§15-781, 15-391, 15-393(L)(10)(b), and the *Quality and Compliance Monitoring Document*.

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

Recommendation 5: The District should analyze central and satellite CTE program outcome data to evaluate the effectiveness of its CTE programs in preparing students for high-need occupations and to support the investment of any public monies.

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

Finding 3: District emailed unencrypted, sensitive information, and employees improperly shared login credentials, which were then stored in an unprotected document, increasing the risk of security breaches and fraud

Recommendation 6: The District should determine what type of information being shared with its accounting and business operations vendor is sensitive, personally identifiable information and should ensure that it only shares this information through secure means, such as through encrypted emails.

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

Recommendation 7: The District should continue developing and implementing written policies and procedures for securing sensitive, personally identifiable information to be shared with its accounting and business operations vendor to reduce the risk of unauthorized access to sensitive information or a security breach.

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



Recommendation 8: The District should identify District accounts with access to sensitive information, immediately reset passwords for the accounts, and keep the password credentials confidential.

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

Recommendation 9: The District should discontinue its practices of requiring employees to share passwords with the business office and storing passwords in an unprotected computer document, and should instead use more secure alternatives, such as creating administrator accounts, which could be used to reset terminated employee passwords when needed.

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

Please advise if you have any questions, or need additional information from the district.

On behalf of the CAVIAT Governing Board and District, thanks,

A handwritten signature in black ink, appearing to read "Brent Neilson EdD", is written over a light blue horizontal line.

Brent Neilson EdD