Division of School Audits

Performance Audit

Antelope Union High School District

STATE OF ARIZONA
OFFICE OF THE
AUDITOR GENERAL

Debra K. Davenport
Auditor General

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June 16, 2011

Members of the Arizona Legislature

The Honorable Janice K. Brewer, Governor

Governing Board
Antelope Union High School District

Mr. Robert Klee, Superintendent
Antelope Union High School District

Transmitted herewith is a report of the Auditor General, *A Performance Audit of the Antelope Union High School District*, conducted pursuant to A.R.S. §41-1279.03. I am also transmitting within this report a copy of the Report Highlights for this audit to provide a quick summary for your convenience.

As outlined in its response, the District agrees with all of the findings and recommendations.

My staff and I will be pleased to discuss or clarify items in the report.

This report will be released to the public on June 17, 2011.

Sincerely,

Debbie Davenport
Auditor General

Antelope Union High School District
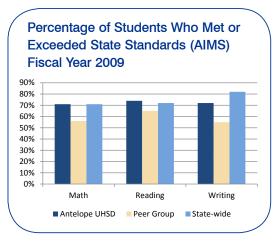
REPORT HIGHLIGHTS
PERFORMANCE AUDIT

Our Conclusion

In fiscal year 2009, Antelope Union High School District's student achievement was much higher than the peer districts' averages, and despite some higher operational costs per pupil, it operated efficiently overall. The District's administration and plant operations costs were much lower than peer averages, and its transportation program operated efficiently with efficient routes and lower costs per mile and per rider than peer districts'. The District's food service costs were slightly higher per meal than peer districts' but the District has already taken steps to address these costs. However, the District needs to address inadequate IT controls.

2011

Higher student achievement and efficient operations

Student achievement exceeds that of peer districts—In fiscal year 2009, Antelope UHSD students' AIMS scores were higher than peer districts', and similar to or higher than the state averages for math and reading. Additionally, the District's 2009 high school graduation rate of 77 percent was slightly higher than peer group and state averages.

Percentage of Students Who Met or Exceeded State Standards (AIMS) Fiscal Year 2009

District operates efficiently overall—Although the District's fiscal year 2009 per-pupil spending was higher in some areas and lower in other areas when compared to peer districts', the District operated efficiently overall. The District had significantly lower per-pupil spending in administration and plant operations, and its transportation program operated efficiently with effective routes and lower costs per mile and per rider than peer districts'. The District's food service costs were slightly higher per meal than peer districts', but the District has taken steps to address these costs.

Expenditures by Function Fiscal Year 2009

Per Pupil	Antelope UHSD	Peer Group Average
Classroom dollars	$5,017	$5,216
Administration	943	1,466
Plant operations	1,220	1,458
Food service	524	467
Transportation	690	472

District's efficient operations due to lower staffing levels

Fewer administrative staff lowers costs—Antelope UHSD's $943-per-student administrative costs were 36 percent lower than the peer districts' average of $1,466, primarily because the District employed fewer administrative staff. The District was able to operate with lower staffing levels because some administrative employees perform duties for what would typically be multiple positions. For example, in addition to typical superintendent duties, the District superintendent also oversees and provides professional development training and performs many business service activities.

Lower plant costs—Antelope UHSD's $1,220-per-pupil plant operations costs were 16 percent lower than the peer districts' average costs, and its $3.70-per-square-foot costs were 35 percent lower primarily because it employed fewer plant staff. In addition, its energy costs per square foot were 21 percent lower than peer districts' in part because of its location. According to our *Arizona Public School Districts' Dollars Spent in the Classroom, Fiscal Year 2005* report, districts located at lower elevation levels and with higher average temperatures, such as Antelope UHSD, typically have lower energy costs.

Lower student transportation costs—Antelope UHSD's $1.43 cost per mile was 44 percent lower and its $681 cost per rider was 19 percent lower than peer districts'. The District achieved lower costs primarily because it employed 29 percent fewer transportation employees than the peer districts. The District was able to do this because some employees from maintenance, food service, and even the classroom also drove bus routes before and after performing their other duties. Further, the District operated efficient routes, filling most buses to more than 80 percent of seat capacity.

IT controls are inadequate to protect sensitive information

The District's computer network, accounting system, and student information system are managed and supported by a vendor. In addition, the Yuma County School Superintendent hosts the District's accounting system.

Although no improper transactions were detected, auditors identified several poor IT controls that exposed the District to increased risk of fraud and errors. Specifically, we observed the following:

Weak password requirements—The District does not require users to periodically change their passwords to the network and accounting system, and the passwords can be very simple and short. Common practice requires passwords to be at least eight characters, with a combination of alphabetic and numeric characters, and should be changed every 90 days.

Inadequate procedures for removing access to critical systems—Antelope UHSD does not ensure that only current employees have access to the network and critical systems. In our review, we found that of six employees no longer working for the District, one still had access to the network and three had access to the student information system.

Better vendor oversight needed— Although the District receives services from a vendor and the Yuma County School Superintendent, the District has no written agreement with either of these groups that would establish specific responsibilities, such as maintaining user access; ensuring data security, and data backup, storage, and recovery; and removing terminated employees' access.

Disaster recovery plan lacking—Finally, the District does not have a disaster recovery plan. A properly designed disaster recovery plan would help ensure continued operations in the event of system failure or interruption. Although the District has backup tapes, they are not stored off-site in a secure location. In addition, the plan should be tested periodically to ensure its effectiveness.

Other IT issues—The District does not review and monitor audit files that log all user activity to determine whether any unauthorized activity or changes to critical applications or systems has occurred. Further, the District does not disable unused network connection outlets, which could allow unauthorized users to connect to the District's network and other critical systems.

Recommendations—The District should:

- Implement stronger password controls.
- Establish policies to delete access to the system when an employee terminates employment.
- Have written agreements with IT service providers.
- Create and implement a formal disaster recovery plan.
- Review and monitor user activity.
- Disable unused network connection outlets.

Antelope Union High School District

A copy of the full report is available at:
www.azauditor.gov
Contact person:
Ann Orrico (602) 553-0333

REPORT
HIGHLIGHTS
PERFORMANCE AUDIT
June 2011
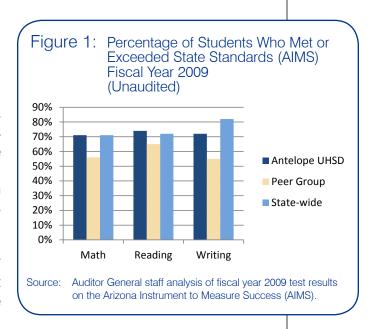
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DISTRICT OVERVIEW

Antelope Union High School District is a small, rural district located about 30 miles east of Yuma, in Yuma County. In fiscal year 2009, the District operated one high school serving 338 students in 9th through 12th grades.

Antelope UHSD compares favorably to its peer districts in both student achievement and operational efficiencies.[1] In fiscal year 2009, the District's student achievement scores were much higher than the peer districts' average and, in math and reading, similar to or higher than the state-wide averages. Relative to its peers, Antelope UHSD operated efficiently in most noninstructional areas. The District operated its administration and plant operations efficiently with costs that were lower than peer district averages, and the District's student transportation program also operated efficiently, despite higher per-pupil costs. However, the District should strengthen controls over its computer network and systems.

Student achievement much higher than peer districts'

In fiscal 2009, 71 percent of the District's students met or exceeded state standards in math, 74 percent in reading, and 72 percent in writing. These scores were above the average for the peer districts' and similar to or above the state average for math and reading. In that same fiscal year, the District's school met all applicable "Adequate Yearly Progress" objectives for the federal No Child Left Behind Act. The District's fiscal year 2009 graduation rate of 77 percent was slightly higher than both the 73 percent peer group average and the 76 percent state average.

Figure 1: Percentage of Students Who Met or Exceeded State Standards (AIMS) Fiscal Year 2009 (Unaudited)

Source: Auditor General staff analysis of fiscal year 2009 test results on the Arizona Instrument to Measure Success (AIMS).

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[1] Auditors developed two peer groups for comparative purposes. See page a-1 of this report's Appendix for further explanation of the peer groups.

Despite mixed costs, District operates efficiently overall

Although Antelope UHSD's fiscal year 2009 per-pupil spending, as shown in Table 1, was higher in some areas and lower in others compared to its peer districts', the District operated efficiently overall.

Lower administrative costs—At $943 per pupil the District's administrative costs were significantly lower than the peer district's average of $1,466 primarily because it employed significantly fewer administrative staff (see Finding 1, page 3). However, this audit identified some administrative practices that Antelope UHSD needs to strengthen (see Finding 2, page 5).

Table 1: Comparison of Per-Pupil Expenditures by Function Fiscal Year 2009 (Unaudited)

Spending	Antelope UHSD	Peer Group Average	State Average
Total per pupil	$9,496	$10,102	$7,908
Classroom dollars	5,017	5,216	4,497
Nonclassroom dollars			
Administration	943	1,466	729
Plant operations	1,220	1,458	920
Food service	524	467	382
Transportation	690	472	343
Student support	587	570	594
Instructional support	438	446	431
Other	77	7	12

Source: Auditor General staff analysis of fiscal year 2009 Arizona Department of Education student membership data and district-reported accounting data.

Lower plant costs—Antelope UHSD's per-pupil and per-square-foot plant operations and maintenance costs were significantly lower than peer districts' because it employed fewer plant staff than peer districts' and it had lower per-square-foot energy costs (see Finding 1, page 3).

Food service costs slightly higher—Antelope UHSD's food service costs were higher per pupil and slightly higher per meal than peer districts'. However, the District has already begun taking steps to reduce its food service costs by analyzing its cost per meal and serving less expensive meals. Also, to keep staffing levels at a minimum, the District began using student workers to help serve meals. The student workers receive a free meal as compensation for their work.

Efficient transportation program despite higher per-pupil costs—Antelope UHSD's per-pupil transportation costs were significantly higher than its peer districts' because it transported a higher percentage of its students. The District's transportation costs per-mile and per-rider were both lower than peer districts' primarily because lower staffing levels and efficient bus routes helped the District operate an efficient program (see Finding 1, page 3).

FINDING 1

District operates efficiently with most costs lower than peer districts'

In fiscal year 2009, Antelope UHSD operated more efficiently, with lower costs, than most of its peer districts'. As shown in Table 2, the District's efficiency measures in administration, plant operations, and student transportation compare favorably to its peer districts. The District attained these lower costs primarily by employing fewer staff.

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Table 2: Comparison of Efficiency Measures
Fiscal Year 2009
(Unaudited)

	Antelope UHSD	Peer Group Average
Students per administrator	73	51
Plant costs per square foot	$3.70	$5.69
Square feet per plant staff	19,600	18,200
Transportation cost per mile	$1.43	$2.55
Transportation cost per rider	$681	$844
Miles per transportation staff	66,126	33,854

Source: Auditor General staff analysis of fiscal year 2009 district-reported accounting data, Arizona School Facilities Board square footage information, and Arizona Department of Education reports.

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Fewer administrative staff lowers costs

At $943 per pupil, Antelope UHSD's fiscal year 2009 per-pupil administrative costs were 36 percent lower than the peer districts' average cost of $1,466 per pupil. Costs were lower primarily because the District employed significantly fewer administrative staff per pupil. Specifically, the District employed 4.6 administrative full-time equivalent (FTE) positions, or one administrative position for every 73 students, while the peer districts averaged 9 FTEs or one administrative position for every 51 students. The District was able to operate with lower staffing levels because some administrative employees perform duties for what would typically be multiple positions. For example, in addition to his typical duties, the District's superintendent oversees and provides professional development training and also performs many business service activities. Beginning in fiscal year 2010, the Superintendent also started serving as the District's high school principal. In addition, the District's school secretary also serves as the attendance clerk and health aide.

Lower plant costs

In fiscal year 2009, the District's $1,220 per-pupil plant operations costs were 16 percent lower than the peer districts' average, and its $3.70 per-square-foot costs were 35 percent lower. The

District achieved lower costs by employing fewer plant staff. Specifically, the District employed one plant FTE for every 19,600 square feet of space while the peer districts averaged one plant FTE for every 18,200 square feet. Further, the District's per-square-foot energy costs were 21 percent lower than peer districts' primarily because of its geographic location. Antelope UHSD is located in an area with a higher average annual temperature and lower elevation than the peer districts, on average. Based on analyses from the Auditor General *Arizona Public School Districts' Dollars Spent in the Classroom, Fiscal Year 2005* report, districts at lower elevations with higher average temperatures typically have lower energy costs.

Lower student transportation costs

Antelope UHSD's $1.43 per mile cost was 44 percent lower than the peer districts' average, and its $681 per rider cost was 19 percent lower. The District achieved lower costs primarily because it employed 29 percent fewer transportation employees than the peer districts. On a per-mile basis, the District employed one transportation FTE for every 66,126 miles it drove, while the peer districts averaged one transportation FTE for every 33,854 miles driven. Antelope UHSD was able to employ fewer bus drivers because many of its nontransportation employees, such as maintenance, food service, and instructional aide personnel, also drove bus routes before and after performing their other duties. Further, the District operated efficient routes, filling most buses to more than 80 percent of seat capacity.

FINDING 2

District lacks sufficient IT controls to adequately protect sensitive information

Antelope UHSD lacks adequate controls over its computer network and systems. Although no improper transactions were detected by auditors, these poor controls exposed the District to an increased risk of errors and fraud. Specifically, auditors observed the following:

Increased risk of unauthorized access to critical systems

Weak controls over user access to the District's student information and accounting systems increase the risk of unauthorized access to these critical systems. These systems along with the District's network are managed by a vendor.

Weak password requirements—The District needs stronger controls over its network and accounting system passwords. Although users develop their own passwords, they are not prompted to periodically change the passwords. Additionally, passwords to the network and accounting system have a low-complexity requirement—that is, passwords can be short and need not contain numbers or symbols. Passwords should be user-defined based on specific composition requirements, known only to the user, and changed periodically. Common practice requires passwords to be at least eight characters, contain a combination of alphabetic and numeric characters, and be changed every 90 days. These practices would decrease the risk of unauthorized persons gaining access to the systems.

District does not monitor user activity—The District does not review and monitor audit files that log all user activity to determine whether any unauthorized activity or changes to critical applications or systems has occurred. This includes monitoring the activities of users from the District's vendor. To reduce the risk of unauthorized activities going undetected, the District should develop policies and procedures for monitoring and reviewing user activities on its network, student information system, and accounting system.

Weakness in physical access controls—The District also had a weakness in its physical access controls because it did not disable unused network connection outlets on district walls. Not disabling unused outlets could allow unauthorized users to access the District's network

and its critical systems. Although no network breach or loss of data occurred, the District should ensure that all unused computer network connection outlets are disabled to reduce the risk of such an event.

Inadequate procedures for removing access to critical applications—The District does not have sufficient procedures in place to ensure that only current employees have access to its network and critical systems. Although the District has a process to inform the vendor when a user is terminated, auditors reviewed network and system access for six terminated employees and found that one employee still had access to the District's network and three employees still had access to the District's student information system despite having left district employment 4 months to over 1 year earlier. Additionally, no network controls are in place to automatically disable accounts that have been inactive for a certain number of days. This would mitigate the risk of terminated employees' access to the system erroneously not being disabled. To reduce the risk of unauthorized access, the District should work with its vendor to establish policies and procedures to address adding and deleting access to its network and critical systems, including procedures to remove accounts when an employee leaves district employment.

District should increase oversight of IT service providers

The District receives multiple services from a vendor for its accounting system, student information system, and network functions, and the Yuma County School Superintendent's Office hosts the District's accounting system. However, the District does not have written agreements with these service providers that stipulate each party's responsibilities. An agreement should specify responsibilities such as establishing and maintaining user access; ensuring the security of data; data backup, storage, and recovery; and removal of terminated employees' access. In addition, vendors' activities are not consistently monitored for all systems. Monitoring vendor activity is important to ensure that vendors provide agreed upon services and to protect sensitive data from errors and fraud.

Lack of disaster recovery plan could result in interrupted operations or loss of data

The District does not have a formal, up-to-date disaster recovery plan, even though it maintains critical student and accounting information on its systems and network. A written and properly designed disaster recovery plan would help ensure continued operations in the case of a system or equipment failure or interruption. Although the District has created backup tapes, they are not stored offsite, which could result in the loss of sensitive and critical data. Disaster recovery plans should be tested periodically, and modifications made to correct any problems and to ensure its effectiveness. Additionally, backup tapes should be stored in a secure offsite location to ensure

that data can be restored in the event that a server at the district office is destroyed or data is lost.

Recommendations

1. The District should implement stronger password controls, requiring its employees to create more secure passwords and to periodically change those passwords.

2. The District should establish written policies and procedures for reviewing and monitoring user activity to determine whether any unauthorized activity or changes to critical applications or systems has occurred.

3. The District should create a formal process for disabling unused network connection outlets on district walls.

4. The District should work with its IT vendor to establish written policies and procedures to address adding and deleting access to systems, including procedures to remove accounts when an employee leaves district employment.

5. The District should establish written agreements with its IT service providers that outline each party's responsibilities for its network, student information system, and accounting system.

6. The District should create a formal disaster recovery plan and test it periodically to identify and remedy deficiencies. Additionally, backup tapes should be stored in a secure offsite location.

OTHER FINDINGS

In addition to the two main findings presented in this report, auditors identified one other, less significant area of concern that requires district action.

District did not conduct random drug and alcohol tests

According to the State's *Minimum Standards for School Buses and School Bus Drivers* (*Minimum Standards*), districts are required to conduct drug and alcohol testing both annually for all drivers and randomly throughout the school year. Specifically, 50 percent of all drivers should be randomly tested for drug use, and 10 percent should be randomly tested for alcohol use. Although district officials ensured that each driver received annual drug and alcohol testing, they did not have a process in place to ensure the required random testing of bus drivers. As a result, none of the District's drivers were randomly tested for drug and alcohol use in fiscal years 2009 and 2010.

Recommendation

The District should ensure that it conducts all required random drug and alcohol testing as specified in the *Minimum Standards*.

APPENDIX

Objectives, Scope, and Methodology

The Office of the Auditor General has conducted a performance audit of the Antelope Union High School District pursuant to A.R.S. §41-1279.03(A)(9). Based in part on their effect on classroom dollars, as previously reported in the Auditor General's annual report, *Arizona Public School Districts' Dollars Spent in the Classroom* (*Classroom Dollars* report), this audit focused on the District's efficiency and effectiveness in four operational areas: administration, plant operation and maintenance, food service, and student transportation. To evaluate costs in each of these areas, only current expenditures, primarily for fiscal year 2009, were considered.[1] Further, because of the underlying law initiating these performance audits, auditors also reviewed the District's use of Proposition 301 sales tax monies and how it accounted for dollars spent in the classroom.

In conducting this audit, auditors used a variety of methods, including examining various records, such as available fiscal year 2009 summary accounting data for all districts and Antelope UHSD's fiscal year 2009 detailed accounting data, contracts, and other district documents; reviewing district policies, procedures, and related internal controls; reviewing applicable statutes; and interviewing district administrators and staff.

To analyze Antelope UHSD's operational efficiency, auditors selected a group of peer districts based on their similarities in district size, type, and location. This operational peer group includes Antelope UHSD and the other 18 high school and unified school districts that also served between 200 and 599 students and were located in town/rural areas.[2] To compare districts' academic indicators, auditors developed a separate student achievement peer group using the same size and location categories as in the operational peer group, but with the additional consideration of each district's poverty rate because poverty rate has been shown to be strongly related to student achievement. Antelope UHSD's student achievement peer group includes Antelope UHSD and the 12 other districts that also served between 200 and 599 students, were located in town/rural areas, and had poverty rates below the state average of 19 percent. Additionally:

- To assess whether the District's administration effectively and efficiently managed district operations, auditors evaluated administrative procedures and controls at the district and school level, including reviewing personnel files and other pertinent documents, and

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[1] Current expenditures are those incurred for the District's day-to-day operation. They exclude costs associated with repaying debt, capital outlay (such as purchasing land, buildings, and equipment), and programs such as adult education and community service that are outside the scope of preschool through grade-12 education.

[2] Auditors excluded one district that received such a high level of additional funding that it skewed the peer-spending averages.
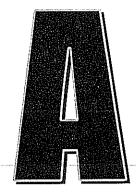
interviewing district and school administrators about their duties. Auditors also reviewed and evaluated fiscal year 2009 administration costs and compared these to peer districts'.

- To assess whether the District's plant operation and maintenance function was managed appropriately and functioned efficiently, auditors reviewed and evaluated fiscal year 2009 plant operation and maintenance costs and district building space, and compared these costs and capacities to peer districts'.

- To assess whether the District's food service program was managed appropriately and functioned efficiently, auditors reviewed fiscal year 2009 food service revenues and expenditures, including labor and food costs, and compared costs to peer districts', reviewed the Arizona Department of Education's food service monitoring reports, and observed food service operations.

- To assess whether the District's transportation program was managed appropriately and functioned efficiently, auditors reviewed and evaluated required transportation reports, driver files, bus maintenance and safety records, and bus capacity usage. Auditors also reviewed fiscal year 2009 transportation costs and compared them to peer districts'.

- To assess whether the District was in compliance with Proposition 301's Classroom Site Fund requirements, auditors reviewed fiscal year 2009 expenditures to determine whether they were appropriate, properly accounted for, and remained within statutory limits. Auditors also reviewed the District's performance pay plan and analyzed how performance pay was being distributed. No issues of noncompliance were identified.

- To assess the District's financial accounting data, auditors evaluated the District's internal controls related to expenditure processing and reviewed transactions for proper account classification and reasonableness. Auditors also evaluated other internal controls that were considered significant to the audit objectives.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

The Auditor General and her staff express their appreciation to the Antelope Union High School District's board members, superintendent, and staff for their cooperation and assistance throughout the audit.

DISTRICT RESPONSE

ANTELOPE

UNION HIGH SCHOOL DISTRICT #50
"HOME OF THE RAMS"
9168 S. AVENUE 36E, WELLTON, AZ 85356

June 7, 2011

Debbie Davenport, Auditor General
State of Arizona
Office of the Auditor General
2910 N. 44th Street, Suite 410
Phoenix, AZ 85018

RE: Response to Antelope Union High School District #50 2009 Performance Audit

Dear Ms. Davenport:

Please accept this as our written response to the Performance Audit conducted by the Auditor General for fiscal year 2009 of the Antelope Union High School District #50. We would like to thank Ann Orrico and her team for the professional manner in which the audit was conducted.

The Governing Board, as well as the District, was very pleased with the District Overview in how we were compared favorably to our peer districts in both student achievement and operational efficiencies.

We found that the audit was very beneficial to our school district. Your recommendations are not viewed as criticism but as a tool to assist the District to perform in a more efficient manner. We welcome your performance improving recommendations as we strive to be more accountable to our students, parents and community.

If you have any questions, please do not hesitate to contact us.

Sincerely,

Robert Klee
Superintendent

RK:mhm

<u>**Finding 2 – IT Controls**</u>

Recommendations

1. **The District should implement stronger password controls, requiring its employees to create more secure passwords and to periodically change those passwords.**

   The District agrees with this recommendation. The District will implement this recommendation for all District users to follow. The District's IT vendor will set up a domain policy that will require all users to reset their password every 120 days with a lockout policy of three (3) failed attempts at which time the users will have to contact the District's IT coordinator. The District will implement policies and procedures to increase password complexity and periodic changing of passwords.

2. **The District should establish written policies and procedures for reviewing and monitoring user activity to determine whether any unauthorized activity or changes to critical applications or systems has occurred.**

   The District agrees with this recommendation. The following policy will be added to the District's technology agreement; "An employee that uses any resource provided by Antelope Union High School District #50 will be subject to information system activity review". The District will implement procedures to regularly review records of information system activity such as audit logs, access reports and security incident tracking reports.

3. **The District should create a formal process for disabling unused network connection outlets on district walls.**

   The District agrees with this recommendation. The District servers have been upgraded to Windows 2008 server software and programmed to require a username and password to access network and internet connections.

4. **The District should work with its IT vendor to establish written policies and procedures to address adding and deleting access**

to systems, including procedures to remove accounts when an employee leaves district employment.

The District agrees with this recommendation. The District has implemented policies and procedures with the IT vendor whereas the Superintendent will approve request to add or delete users through a flow chart put into place. The District's IT coordinator will have the responsibility to make sure that the requests have been met with the District's IT vendor. All requests will be done via email.

5. **The District should establish written agreements with its IT service providers that outline each party's responsibilities for its network, student information system, and accounting system.**

The District agrees with this recommendation. The District is in the process of working with the IT vendor to establish written agreements to outline the responsibilities in the three areas as recommended by the AG's office.

6. **The District should create a formal disaster recovery plan and test it periodically to identify and remedy deficiencies. Additionally, backup tapes should be stored in a secure offsite location.**

The District agrees with this recommendation. The District will implement this recommendation in fiscal year 2011-2012. The student information system, accounting system, credit recovery and benchmark testing data will be stored off campus at two different locations. The web based programs used for these purposes will make this possible. Each vendor has guaranteed the storage and security of the data that the District will be using. District and staff data will be backed up locally and moved off campus to another location every Friday of each week.

Other Findings – Transportation

Recommendation

1. **The District should ensure that it conducts all required random drug and alcohol testing as specified in the Minimum Standards.**

The District agrees with this recommendation. The District conducts drug and alcohol testing annually for all drivers and will also conduct the random drug and alcohol testing on two drivers each quarter to commence in fiscal year 2011-2012.