

East Valley Institute of Technology

Report 1 of 2

24-Month Followup of Performance Audit Report 24-204

The March 2024 East Valley Institute of Technology performance audit found that the District spent \$85.9 million on career and technical education (CTE) programs in fiscal year 2022 but did not follow requirements, recommended practices, or its policies in various areas, increasing its risk for errors, fraud, and data loss; and did not collect, validate, and use key CTE program outcome data to demonstrate how it effectively prepared students for high-need occupations. We made **30** recommendations to the District.

District's status in implementing 30 recommendations

Implementation status		Number of recommendations
	Implemented	12 recommendations
	In process	15 recommendations
	No longer applicable	1 recommendation
	Not implemented	2 recommendations

We will conduct a 36-month followup with the District on the status of the recommendations that have not yet been implemented.

Recommendations to the District

Finding 1: District did not comply with important cash-handling requirements, resulting in potential loss of CTE program monies and increased risk of fraud

1. The District should comply with *Uniform System of Financial Records for Arizona School District* (USFR) requirements to establish and maintain effective policies and procedures to safeguard cash, prevent its loss or misuse, provide prompt and intact depositing, and ensure its accurate recording by developing detailed written policies and procedures for District staff that addresses allowable price modifications, required documentation supporting any modifications made, and when zeroed-out transactions are allowable.

► Status: **Implemented at 24 months.**

Since the prior initial followup, the District has updated its cash-handling policies and procedures, including those for its cosmetology and barbering programs, to address the deficiencies we identified. For instance, the District's updated procedures specify allowable price modifications, the required documentation to support modifications, and when zeroed-out transactions are allowable. Although the District's updated cash-handling procedures appear to address the deficiencies we identified during the audit, as reported in recommendation 2, we identified some instances in which the District did not follow its updated procedures.

2. The District should develop and implement processes for monitoring District staff, including CTE program instructors, to ensure they comply with the District's cash-handling policies and procedures.

► Status: **Implementation in process.**

Although the District has developed cash-handling procedures for supervisors to monitor CTE program instructors' cash handling, including zeroed-out transactions, it has not developed similar procedures that apply to all District staff, such as staff who collect cash at the District's business office. Additionally, we identified instances in which the District had not consistently followed its updated cash-handling procedures. For instance, our review of the District's 110 March 2026 cash collections totaling \$11,361 found that 53 cash collections totaling \$2,806 were deposited between 8 and 35 days after collection, which was after the 7 days required by the District's procedures. These deficiencies indicate that the District's processes to monitor District staff involved in the cash-handling process may have been ineffective or need to be enhanced. We will review the District's efforts to implement this recommendation at the 36-month followup.

3. The District should ensure cash receipt reconciliations are assigned to District staff and are completed, reviewed, and retained in accordance with USFR guidelines and the District's updated policy, including reconciling salon appointments to cash collections and cash deposits and reviewing all zeroed-out transactions to ensure they are documented accordingly.

▶ Status: **Implemented at 24 months.**

The District ensured cash receipt reconciliations were assigned to District staff and were completed, reviewed, and retained in accordance with USFR guidelines and the District's updated policy. Our review of the District's March 2026 cash receipts identified 3 zeroed-out transactions, all of which were reviewed and approved by business office staff in accordance with District policies. Additionally, although the District's cosmetology program no longer accepts cash, District officials reported that they were now reconciling salon appointments to credit card transactions.

4. The District should provide training on USFR cash-handling and recordkeeping responsibilities and District policies and procedures for price modifications and documentation requirements to all employees involved in cash collection, deposit, review, and approval.

▶ Status: **Implementation in process.**

Our review of the District's cash-handling training documentation found that the District provided cash-handling training to all 11 employees with cash-handling responsibilities in March 2026. However, as discussed in recommendation 2, the District did not consistently follow its deposit procedures for 53 of 110 March 2026 cash collections we reviewed, which indicates that the District's training may have been ineffective or needs to be updated. We will review the District's efforts to implement this recommendation at the 36-month followup.

5. The District should promptly report instances of suspected fraud, theft, waste, or abuse to appropriate authorities, including the Arizona Auditor General and the Arizona Attorney General.

▶ Status: **Implemented at 24 months.**

Since the audit, the District promptly reported 2 instances of potential misuse of public monies, which were unrelated to cash handling, to our Office and/or the Arizona Attorney General, and District officials indicated they would continue doing so in the future.

Finding 2: Contrary to State laws, District spent nearly \$14,500 on food and beverages for District events without Board approval, limiting public transparency into its activities

6. The District should stop providing food and beverages for any purposes without prior Board approval.

▶ Status: **Implemented at 12 months.**

We reviewed all Governing Board (Board) meeting minutes from January 2024 through March 2025 and found that the District obtained prior Board approval for all 17 District events where it provided food and beverages during this time frame. Additionally, we reviewed the District's fiscal year 2025 accounting data through March 2025 and did not identify any other instances of the District providing food and beverages without prior Board approval.

7. The District should ensure it documents the public purpose and benefit of providing food and beverages at District events. For each allowable District event, the District should document its statutory authority, document the public purpose and benefit of providing food and beverages at the event, ensure the event and all purchases are in accordance with its policies, and maintain documentation supporting all purchases.

▶ Status: **Implemented at 12 months.**

The District spent approximately \$12,000 to provide food and beverages at 17 District events between January 2024 and March 2025, which consisted primarily of Board and CTE director meetings. We reviewed Board meeting minutes from this time frame and found that the District documented its statutory authority and the public purpose and benefit of providing food and beverages at these events, and the Board approved the purchases. We judgmentally selected 3 of these events for further review to determine whether the District followed its policies for food and beverage purchases and found that all 3 purchases complied with the District's policies, including Board-approved spending limits.

Finding 3: District's timelines for approving satellite CTE programs did not always provide member districts sufficient time to plan satellite programs, resulting in member districts operating programs without Board approval and spending monies to set up a satellite program that was subsequently disapproved

8. The District should work with member districts to update IGAs to ensure that deadlines for satellite program approval are consistent and provide sufficient time for member districts to plan for approved satellite programs.

► Status: **Implementation in process**

Since mid-fiscal year 2026, the District and 9 of its 11 member districts have been involved in a legal dispute related to member district funding. As a result, only the 2 member districts not involved in the legal dispute with the District had Board-approved IGAs in effect for fiscal year 2026. We reviewed 1 of the 2 active IGAs, which are valid through fiscal year 2028, and found that the IGA we reviewed included consistent CTE program-approval deadlines that would likely provide sufficient time for the member district to plan for approved satellite program offerings. Although the legal issues were not fully resolved at the time of this followup's issuance, the District reported that it initiated IGAs with the remaining 9 member districts at the end of July 2026 for fiscal year 2027. The District will need to initiate new IGAs with these Districts for fiscal year 2028, and we will again assess the status of this recommendation at the 36-month followup.

Finding 4: District's lack of complete and reliable key outcome data prevents it from demonstrating how the \$85.9 million it spent on programs in fiscal year 2022 effectively prepared students for high-need occupations

9. The District should develop and implement consistent data collection protocols for all CTE programs to demonstrate compliance with statutory and ADE requirements and recommended practices. This includes collecting and validating complete data, such as data related to student certifications earned and post-graduate jobs obtained, as well as developing a process to track all outcome data.

► Status: **Implementation in process.**

Although the District has developed and implemented consistent data-collection protocols for central program outcome data, such as post-graduate jobs obtained and student certifications earned, it has not done so for satellite programs or begun collecting outcome data from member districts.

We judgmentally selected and reviewed 43 central CTE program graduates from 3 central CTE programs in fiscal year 2024 that the District reported as employed after graduation. We found that the District had reasonably assessed and correctly reported all 43 central graduates' jobs to ADE as related or unrelated to their respective CTE programs. Additionally, we reviewed documentation supporting certifications earned for a random sample of 30 students in each of the 3 central CTE programs for which

we assessed post-graduation jobs and found that the District had accurately tracked, validated, and reported to ADE certifications earned for all 90 students in accordance with State laws and ADE requirements.

Although it had improved its data-collection and validation processes for its central CTE programs, District officials reported that they have continued to rely on member districts to track and submit accurate and complete outcome data to ADE for satellite programs. The District also indicated it had not yet developed a process for reviewing member districts' outcome data or associated supporting documentation to ensure it is accurate and reliable prior to member districts reporting the information to ADE. Accordingly, the District continues to increase the risk that member districts are not collecting or inconsistently collecting key program outcome data, which could result in member districts reporting inaccurate or incomplete information to ADE. We will assess the District's efforts to implement this recommendation at the 36-month followup.

- 10.** The District should analyze all 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, and use the results of its evaluations to make changes to its programs to ensure they are meeting their statutory purpose of preparing students for high-need occupations.

► Status: **Implementation in process.**

The District analyzed some outcome data to evaluate the effectiveness of its CTE programs and reported making some changes to ensure programs are meeting their statutory purpose to prepare students for high-need occupations. Specifically, the District presented program-retention data to its Board for all central and satellite CTE programs showing whether each program met the District's goals for the percentage of students completing their CTE programs. Additionally, as described in recommendation 9, the District collected student certifications earned and post-graduation jobs obtained for its central programs, and District officials reported using this data to change certifications offered for 1 program and the timing of certification testing for another program to ensure students earned relevant industry certifications to prepare them for jobs in those fields.

However, as previously described, the District has not yet implemented consistent data-collection protocols for its satellite programs. As such, it lacks critical information to help it accurately assess the quality of satellite programs and identify necessary program changes. District officials reported that they hired additional instructional specialists to monitor, evaluate, and improve member districts' satellite programs starting in fiscal year 2027. According to District officials, the instructional specialists will perform activities such as reviewing program outcome data to ensure the programs lead to relevant industry certifications and providing curriculum oversight to ensure that programs are teaching relevant skills. We will assess the District's efforts to implement this recommendation at the 36-month followup.

Finding 5: District's adult education program tuition and fees did not cover program expenses, resulting in a combined deficit of more than \$1.6 million in fiscal years 2021 and 2022

- 11.** The District should calculate the full cost of providing each adult education program and use this information to set tuition and fees for these programs, including providing an explanation if the full cost of providing these programs will not be recovered, and provide updated program tuition and fees information to its Board.

▶ Status: **Implemented at 24 months.**

The District calculated the full costs of providing its 11 adult education programs and 2 associate degree programs in fiscal year 2027 to determine tuition prices and minimum student enrollments needed to ensure each program's revenues fully cover program costs. We reviewed the District's cost analysis and found that the proposed tuition and fees appeared to be reasonable and would fully cover the anticipated costs of each program if the District meets its minimum program enrollment. The District presented its analysis and proposed fiscal year 2027 program tuition and fees, which were based on its analysis, to its Board for approval in February 2026, which the Board approved.

- 12.** The District should monitor adult education spending and complete long-term forecasting to anticipate future costs of providing adult education programs, including associate degree programs, to ensure its adult education program tuition and fees cover program expenses.

▶ Status: **Implementation in process.**

Although the District has completed some long-term forecasting for its 2 associate degree programs to ensure tuition and fees fully cover future program costs, it has not done so for its 11 adult education programs. District officials reported that they plan to complete long-term forecasting for the remaining adult education programs by the end of calendar year 2026. Monitoring adult education spending is important because tuition and fee revenues can vary annually. For instance, in fiscal year 2024, we found that the District's adult education program revenues exceeded expenses by an estimated \$800,000, but in fiscal year 2025, the District operated its adult education programs at a combined loss of about \$100,000. We will assess the District's efforts to implement this recommendation at the 36-month followup.

Finding 6: District accumulated over \$71 million in fund balances by end of fiscal year 2022 but did not have policy regarding amount to be maintained in its general fund or its intended purpose

- 13.** The District should implement the Government Finance Officers Association's (GFOA) best practices recommendations and update its fund balance policy for its general fund regarding the level and purpose of those monies, including considering the financial resources available in other funds when assessing the adequacy of the unrestricted fund balance in the general fund.

► Status: **Implemented at 24 months.**

The District updated its fund balance policy for its general fund to implement GFOA's recommendations in March 2026. The District's updated fund balance policy includes a target reserve balance of no less than 2 months of general fund operating expenditures, steps to replenish the fund balance if it falls below a minimum level, and consideration of financial resources available in other funds, such as restricted funds. The policy also includes potential uses for any unassigned fund balance in excess of the policy's minimum reserve balance, including strategic investments aligned with the District's goals and the prepayment of District liabilities.

- 14.** The District should develop and implement a plan to spend on its CTE programs any unrestricted fund balance in its general fund that is greater than the level it has adopted in its formal fund balance policy, which may include spending to improve its key student outcomes.

► Status: **Implementation in process.**

As discussed in recommendation 13, in March 2026, the District's Board adopted an updated fund balance policy that includes a target reserve balance and potential uses for funds in excess of the minimum target reserve balance. However, because the policy update is recent, we were unable to confirm whether the District has fully implemented the policy and whether it is using excess fund balance monies in accordance with the planned uses stated in its policy. Our review of the District's fiscal year 2025 financial statements found that the District ended the year with approximately 2.5 months of expenditures in its general fund balance, or about \$4 million more than its target reserve balance. The District spent nearly \$100 million in fiscal year 2025, primarily on payments to member districts and central CTE program instruction. We will assess the District's efforts to implement this recommendation at the 36-month followup.

Finding 7: District did not ensure monies it provided to its member districts were used to supplement CTE spending, potentially impacting satellite program quality

- 15.** The District should ensure its IGAs with member districts are up to date, including updating the IGAs to require member districts to provide the required CTED supplanting worksheet rather than USFR Memorandum 219.

► Status: **Implementation in process.**

As explained in recommendation 8, the District had fiscal year 2026 IGAs with only 2 of its 11 member districts due to a legal dispute related to member district funding. We reviewed 1 of the 2 active IGAs, which are valid through fiscal year 2028, and found that the IGA we reviewed no longer references the outdated USFR Memorandum 219 and requires the member district to submit the CTED supplanting worksheets annually. The District reported that it initiated IGAs with the remaining 9 member districts at the end of July 2026 for fiscal year 2027. These IGAs are in effect for 1 year, and the District will need to initiate new agreements for fiscal year 2028. As such, we will again assess the District's efforts to implement this recommendation at the 36-month followup.

- 16.** The District should ensure all member districts complete the required CTED supplanting worksheet and provide the worksheets and any supporting documentation to the District, ADE, and the District's Board annually by required deadlines and take appropriate action when member districts do not complete the required worksheet. Appropriate action could include working with ADE and developing and implementing a process, such as within its IGAs with member districts, to describe the District's and member districts' responsibilities and resulting actions when a member district does not submit the required worksheet.

► Status: **Implemented at 24 months.**

We found that 10 of 11 of the District's member districts submitted 2025 CTED supplanting worksheets to ADE by the required deadline. The 1 member district that did not submit its supplanting worksheet by the required deadline submitted it approximately 3 weeks late.¹ We also found that the District had documentation of all 11 worksheets. Additionally, we reviewed the District's fiscal year 2026 IGA with 1 member district and found the IGA included a provision allowing the District to suspend payments to member districts that do not complete the required supplanting worksheet by the required deadline.

¹ The deadline to submit the required supplanting worksheet was November 15, 2025. Apache Junction Unified School District submitted its supplanting worksheet to ADE on December 5, 2025.

- 17.** The District should ensure that CTE monies provided to member districts are being used to supplement their required level of CTE spending and, if it identifies supplanting, take appropriate action. Appropriate action could include working with ADE and developing and implementing a process, such as within its IGAs with member districts, to describe the District's and member districts' responsibilities and resulting actions when it identifies supplanting in CTE program spending.

▶ Status: **Not implemented.**

The District has not developed a process for taking appropriate action when it identifies that member districts use District-provided CTE monies to supplant their required base-year CTE spending. We reviewed fiscal year 2025 CTED supplanting worksheets for all 11 of the District's member districts and found that 3 member districts appeared to have supplanted their CTE spending. District officials were aware of the 3 Districts' potential supplanting when we brought it to their attention during the followup and indicated that they are in the process of updating future IGAs with member districts to include actions the District will take when it identifies supplanting by member districts in the future. We will assess the District's efforts to implement this recommendation at the 36-month followup.

Finding 8: District awarded more financial aid to 31 students than allowed by its procedures, potentially preventing students with higher need from receiving financial aid

- 18.** The District should ensure its established procedures for disbursing grant monies meet applicable federal guidelines and follow these established procedures when disbursing grant monies to students.

▶ Status: **No longer applicable.**

According to the District, since the audit, it has not received any Higher Education Emergency Relief Fund (HEERF II) grant monies, which it had previously used to provide financial aid to students. All remaining HEERF II grant monies were disbursed to students in August 2023. Our review of the District's fiscal year 2024 *Annual Financial Report* and fiscal year 2025 detailed accounting data through May 2025 confirmed that none of the District accounts that had held these monies showed any activity, and all had \$0 balances.

Finding 9: District incorrectly accounted for vending machine revenues, potentially affecting the accuracy of its financial reporting

- 19.** The District should ensure it accurately accounts for its vending machine revenues consistent with USFR's Chart of Accounts, including depositing those to the Auxiliary Operations fund.

▶ Status: **Implemented at 12 months.**

Our review found that in fiscal years 2024 and 2025, the District deposited vending machine revenues into its Auxiliary Operations Fund in accordance with the USFR. Specifically, the District reclassified all vending machine revenues deposited into the Gifts and Donations Fund into the Auxiliary Operations Fund, leaving the Gifts and Donations Fund that staff had used for depositing vending machine revenues with a \$0 balance. Additionally, for fiscal year 2026, the District deactivated the Gifts and Donations Fund into which staff had been improperly depositing the vending machine revenues. Officials indicated that change should prevent misdirected deposits and ensure that staff deposit vending machine revenues into the appropriate fund going forward.

- 20.** The District should evaluate its existing Gifts and Donations fund balance to identify and reclassify all previously misclassified vending machine revenues consistent with USFR's Chart of Accounts.

▶ Status: **Implemented at 12 months.**

As discussed in recommendation 19, the District provided documentation showing that it reclassified all remaining vending machine revenues in accordance with USFR's Chart of Accounts.

Finding 10: District's excessive access to its sensitive computerized data and other IT deficiencies increased risk of unauthorized access to sensitive information, errors, fraud, and data loss

- 21.** The District should review and reduce the number of users with administrator-level access to its network and critical systems to only those individuals with a business need for administrator-level access.

▶ Status: **Implemented at 24 months.**

We found that the District had reviewed user access to its network and accounting system and had ensured that there were no accounts with unnecessary administrator-level access to the network and accounting system. The District receives accounting support from the Maricopa County School Superintendent's Office (County), and we identified 6 County users with administrator-level access to the District's accounting system, all of which the District had worked with the County to ensure required this level of access. Although the District has reduced the number of users with administrator-level access to only those users it determined has a business need for such access, we identified issues with the District's process for monitoring County users' system activities (see explanation for recommendation 26).

- 22.** The District should develop and implement a formal process to regularly perform, at least annually, detailed reviews of administrative and user accounts and assess their access level and need for network and critical systems access to ensure that access level was appropriate, and access was promptly disabled when it was no longer needed.

► Status: **Implementation in process.**

The District updated its policies to include additional details about when and how it will review user access levels to determine whether system access is appropriate and disable system access when no longer needed. However, the District has not fully implemented its updated policies. Specifically, the District had not removed 1 of 7 unnecessary accounts identified during our prior initial followup, and our May 2026 review identified another 9 network accounts and 1 student information system account that were active despite no longer being needed. By not timely disabling user accounts when they are no longer necessary, the District increases the risk of unauthorized access to District systems and data loss. After we brought the unnecessary accounts to the District's attention, District officials reported that they had limited access to them. We will review the District's efforts to implement this recommendation at the 36-month followup.

- 23.** The District should improve procedures to ensure that terminated employees have their network and accounting system access promptly removed to reduce the risk of unauthorized access.

► Status: **Implementation in process.**

The District has updated its policies and procedures for disabling employee accounts when an employee leaves District employment, but we found that the District had not fully implemented its updated policies and procedures. Specifically, our May 2026 review identified 3 network user accounts associated with terminated employees, which was fewer than the 5 user accounts we identified during the audit. These accounts were active for at least 2 years since the associated employees left District employment. We did not identify any terminated employees who continued to have access to the District's accounting system. After we brought the unnecessary network accounts to the District's attention, District officials reported that they changed the passwords to prevent terminated employees from gaining access and planned to remove them in accordance with the District's updated policies and procedures. We will assess the District's efforts to implement this recommendation at the 36-month followup.

- 24.** The District should limit employees' access in the accounting system to only those accounting system functions needed to complete their job duties.

► Status: **Implementation in process.**

We reviewed accounting system access for all 70 of the District's active accounting system user accounts in May 2026 and found that 2 users continued to have more access than necessary, which was an improvement from the 6 users with excessive access we identified during the initial followup. The 2 users we identified had the ability to initiate and complete a payroll transaction in the accounting system without

another employee reviewing and approving the transactions, which increases the District's risk for errors and fraud. We will review the District's efforts to implement this recommendation at the 36-month followup.

- 25.** The District should develop and implement formal processes to assign new employees appropriate access in the accounting system and to change employees' access if their assigned duties change to help ensure users have only the access necessary to complete their job duties.

► Status: **Implementation in process.**

The District updated its policies in April 2026 to include formal processes for assigning appropriate access levels to new employees in the accounting system and for modifying access when employees' assigned duties change to ensure that users have only the access necessary to complete their job duties. However, during the followup, we did not identify any employees who had started District employment or whose duties had changed since the District began using its new process and therefore could not assess whether the District was following its updated policies. We will assess the District's efforts to implement this recommendation at the 36-month followup.

- 26.** The District should work with the County to limit the access of County accounting system user accounts to only those functions needed to support the District and ensure that no one person can initiate and complete a transaction without an independent review and approval. If County users require administrator-level access to perform their job duties, the District should implement compensating controls, such as reviewing activity logs, to limit the risk of unauthorized access, errors, and fraud.

► Status: **Implementation in process.**

As discussed in recommendation 21, the District has worked with the County to ensure that all 6 County users identified require administrator-level access to perform their job duties. However, while District officials reported they have implemented compensating controls such as a review of accounting system change and activity logs, they were unable to provide documentation showing the results of these reviews. Further, the District lacks procedures specifying who should conduct the reviews of County users' activity logs, how often the reviews should occur, and what the reviews should entail. We will assess the District's efforts to implement this recommendation at the 36-month followup.

- 27.** The District should implement and enforce strong authentication controls such as multifactor authentication (MFA) and strong passwords, or compensating controls when MFA is not possible, that align with credible industry standards to decrease the risk of unauthorized persons gaining access to sensitive District information and disrupting operations.

► Status: **Implemented at 24 months.**

Since the initial followup, the District has implemented and enforced strong authentication controls such as multifactor authentication and passwords that align with credible industry standards.

- 28.** The District should develop and implement a formal process to review the District's authentication controls against industry standards at least annually.

► Status: **Implementation in process.**

The District has developed a formal process to review the District's authentication controls against credible industry standards annually but has not yet implemented this process nor completed such a review. We will review the District's efforts to implement this recommendation at the 36-month followup.

- 29.** The District should establish and implement a District policy to conduct mandatory employee security awareness training, at least annually, including security awareness training for new staff when they start their District employment.

► Status: **Not implemented.**

The District has established a policy requiring staff to complete security awareness training when they begin District employment and annually thereafter, but it has not ensured that all staff were enrolled in and completed the training in accordance with its policy. Specifically, we reviewed security awareness training records for 151 new employees hired between May 2025 and May 2026 and found that 32% of them had been enrolled in the required security awareness training, and 21% completed the training during that time. Additionally, we found that employees who had been enrolled in security awareness training before May 2025 were not reassigned to complete the training again in fiscal year 2026, contrary to the District's policy for the training to be completed annually.

When we informed District officials of these issues during the followup, they reported they had not assigned anyone to manage the training and had since updated the online system to automatically assign employees security awareness training each year in accordance with District policy. However, by not ensuring staff receive the required security awareness training, the District continues to be at an increased risk of cybersecurity events resulting in unauthorized system access, data loss, and disruptions to District operations. We will review the District's efforts to implement this recommendation at the 36-month followup.

- 30.** The District should develop and implement an IT contingency plan that meets USFR requirements and credible industry standards, perform documented tests against the plan, at least annually, to identify and remedy any deficiencies, and update the plan based on the results of these tests.

► Status: **Implementation in process.**

Although the District developed a new IT contingency plan in April 2026 that meets most USFR requirements and credible industry standards, it does not clearly outline who is responsible for various activities during a disaster, as required.

Additionally, the District performed and documented a disaster recovery test in February 2026, which was 2 months before it developed and implemented its new IT contingency plan. As such, the District's updated plan has not yet been tested to determine whether it is effective and would facilitate the District's recovery in the event of a cybersecurity incident. We will assess the District's efforts to implement this recommendation at the 36-month followup.