



**COLD SPRING HARBOR CENTRAL  
SCHOOL DISTRICT  
*RISK ASSESSMENT UPDATE REPORT  
FOR THE PERIOD ENDING  
MAY 31, 2012***

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

**TABLE OF CONTENTS**

Risk Assessment Letter

Report Introduction

Pages 1 – 3

Assessment of Risk and Testing Plan

Pages 4 – 5

Risk Assessment Update Report

Pages 6 – 13

Board of Education  
Cold Spring Harbor Central School District  
75 Goose Hill Road  
Cold Spring Harbor, NY 11724

We have completed our annual risk assessment of the Cold Spring Harbor Central School District (the "District") for the period ending May 31, 2012. The purpose of our engagement is to assist you in better monitoring and managing the risks that the District faces on a day-to-day basis. Additionally, the objectives of the engagement were to assist the Board of Education (the "Board") in ensuring that the District's risks are identified and that appropriate internal controls are in place to mitigate those risks.

In connection with the development of the risk assessment, we have performed the following procedures:

- Gained an understanding of the internal controls for the following key business processes:
  - Governance and Planning
  - Accounting and Reporting
  - Cash Management
  - Revenue and Billings
  - Grants
  - Payroll
  - Human Resources
  - Benefits
  - Purchasing and Related Expenditures
  - Facilities and Capital Projects
  - Capital Assets
  - Food Service Operations
  - Extraclassroom Activity Fund
  - Information Technology
  - Student Related Data and Services
  - Transportation Services
  - Student Services
- Identified the risks that could inhibit the District in achieving its goals;
- Identified the internal controls that the District has in place that are designed to mitigate identified risks; and
- Identified key areas where the District can strengthen existing internal controls and/or create additional internal controls.

The results of our procedures are presented on the following pages.

As noted, the purpose of our engagement was to assist you in improving the process by which you monitor and manage the risks that face your District. However, it is ultimately your responsibility to assess the adequacy of your risk management system.

In performing our engagement, we relied on the accuracy and reliability of information provided by District personnel. We have not audited, examined, or reviewed the information, and express no assurance on it.

We would like to acknowledge the courtesy and assistance extended to us by personnel of the District. We are available to discuss this report with the Board or others within the District at your convenience.

This report is intended solely for the information and use of the Board, the Audit Committee and the management of the District and is not intended to be and should not be used by anyone other than those specified parties.

Very truly yours,

*R.S. Abrams & Co., LLP*

R.S. Abrams & Co., LLP  
June 19, 2012

**Cold Spring Harbor Central School District  
Risk Assessment Update Report Introduction  
For the Period Ending May 31, 2012**

**Overview**

This report serves to address the second requirement of Chapter 263 of the laws of New York, 2005, which requires all school districts to establish an internal audit function. The requirements are as follows:

1. Engagement of a qualified audit firm or individual to make an initial assessment of risk surrounding the design of the district's internal controls;
2. **Annual update of the initial risk assessment;** and
3. Testing of these controls on a periodic basis for operational effectiveness.

This risk assessment update is intended to provide management with information to enhance and strengthen the District's controls and to reduce the District's risk relating to its financial processing and reporting operations.

The initial risk assessment required an internal auditor to obtain an understanding of the risks associated with the various business processes within the District. This requirement involved two categories of risk assessment:

- **Inherent Risk** - the risk associated with the nature and type of transactions processed due to complexity, materiality and quantity of the transactions. Factors that may affect inherent risk include, but are not limited to: the nature of transactions and the history of errors in the account, the degree of judgment involved in determining the account balance and the amount of unusual or complex transactions. The assessment of inherent risk excludes the effect of any related controls.
- **Control Risk** – the risk that the internal control system is not adequately designed to prevent or detect errors or irregularities on a timely basis that could be material individually or when aggregated with misstatement in other balances or account classes. This can result from the internal control system losing its effectiveness over time and is a function of the effectiveness of the design and operation of internal control in achieving the District's objectives relevant to the preparation of the District's financial statements.

**Report Components**

The risk assessment update report that follows is comprised of the following two components:

1. Assessment of inherent and control risk of the District's primary business processes and sub-processes presented in tabular form, which details the specific processes that were reviewed. This risk assessment includes our assessment of risk as of May 31, 2011 and the updated risk assessment as of May 31, 2012.

**Cold Spring Harbor Central School District  
Risk Assessment Update Report Introduction  
For the Period Ending May 31, 2012**

2. Risk assessment update for the District's primary business processes and sub-processes that were assessed with either a moderate or high control risk for the prior year's risk assessment update as of May 31, 2011, in narrative form. Additionally, this section details our assessment of control risk for the business sub-processes that were newly evaluated during the period ending May 31, 2012, in narrative form.

**Methodology of Risk Assessment Update**

We determined the status for the current year's risk assessment update through various methods, including inquiry of appropriate District personnel involved in these processes, observation of the controls in place, results of internal control questionnaires related to the various business units and testing the controls where necessary to determine if they have been put in place and are functioning as intended.

Additionally, we have reviewed the results of reports issued by our firm during the period ending May 31, 2012, including a report on the District's food service operations to determine if relevant controls have been put in place based on those reports. We have also reviewed and updated the controls from reports issued in the prior fiscal year to determine if the controls are still functioning as intended.

**Process Review Summary**

The following represents the business processes where we have provided internal audit services:

2011 – 2012 Extensive System Review:

- Capital Assets

2010 – 2011 Extensive System Review:

- Food Service Operations

2009 – 2010 Extensive System Review:

- Extraclassroom Activity Fund

2008 – 2009 Extensive System Review:

- Personnel and Payroll Processing

2007 – 2008 Extensive System Review:

- Procurement and Claims Processing

**Corrective Action Plan**

The District is required to prepare a corrective action plan in response to any findings contained in the internal audit reports. As per Commissioner's Regulation §170.12, a corrective action plan, which has been approved by the Board, must be submitted to the State Education Department within 90 days of the receipt of a final internal audit report.

**Cold Spring Harbor Central School District  
Risk Assessment Update Report Introduction  
For the Period Ending May 31, 2012**

The approved corrective action plan and a copy of the respective internal audit report should be sent to the following address:

New York State Education Department  
Office of Audit Services, Room 524 EB  
89 Washington Avenue  
Albany, New York 12234  
Attention: John Cushin

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

**TABLE OF CONTENTS**

Risk Assessment Letter

Report Introduction

Pages 1 – 3

Assessment of Risk and Testing Plan

Pages 4 – 5

Risk Assessment Update Report

Pages 6 – 13

**Cold Spring Harbor Central School District  
Assessment Of Risk and Testing Plan  
For the Period Ending May 31, 2012**

<b>Legend</b>	
✓	Extensive system process review completed
■	Extensive system process review proposed
•	New processes evaluated
N/A	Process not evaluated for the year ended 5/31/11
<b>H = High M = Moderate L = Low</b>	

<b>BUSINESS PROCESSES &amp; SUBPROCESSES</b>	<b>Inherent Risk</b>		<b>Control Risk</b>		<b>Audit Plan</b>		
<b>GOVERNANCE &amp; PLANNING</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Governance and Control Environment	H	H	L	L			
Budget Administration	H	H	L	L			
Open Meetings Law	N/A	H	N/A	L		•	
<b>ACCOUNTING &amp; REPORTING</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Financial Accounting and Reporting	H	H	L	L			
Auditing	M	M	L	L			
Fund Balance Management	H	H	L	L			
Reserves and Fiscal Health	H	H	M	L			
GASB Statement 54	M	M	M	L			
<b>CASH MANAGEMENT</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Collection & Posting of Receipts	H	H	L	L			
Cash and Investment Management	H	H	L	L			
Wire Transfers and Banking Controls	H	H	L	L			
Bank Reconciliations	N/A	H	N/A	L		•	
Banking Security	N/A	H	N/A	M		•	
<b>REVENUE AND BILLINGS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Tuition	M	M	L	L			
<b>GRANTS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
General Processing and Monitoring	M	M	L	L			
Grant Application	M	M	L	L			
Allowable Costs and Compliance	M	M	L	L			
ARRA ESF Compliance	H	H	L	L			
<b>PAYROLL</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Payroll Distribution	H	H	L	L			
Payroll Accounting and Reporting	H	H	L	L			
Tax Filings and Reconciliation process	M	M	L	L			
Separation Payments	H	H	L	L			
<b>HUMAN RESOURCES</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Employment Requisition and Hiring	M	M	L	L			
Employment Termination	M	M	L	L			
Employee Attendance	H	H	L	L			
<b>BENEFITS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Eligibility	M	M	L	L			
Benefit Calculations	H	H	L	L			
Retiree Health Insurance	H	H	M	L			
<b>PURCHASING &amp; RELATED EXPENDITURES</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Purchasing Process and Purchase Order System	H	H	L	L			
Payment Processing	H	H	L	L			
Travel and Conferences	H	H	M	M			

**Cold Spring Harbor Central School District  
Assessment Of Risk and Testing Plan  
For the Period Ending May 31, 2012**

<b>Legend</b>	
✓	Extensive system process review completed
■	Extensive system process review proposed
•	New processes evaluated
N/A	Process not evaluated for the year ended 5/31/11
<b>H = High M = Moderate L = Low</b>	

<b>BUSINESS PROCESSES &amp; SUBPROCESSES</b>	<b>Inherent Risk</b>		<b>Control Risk</b>		<b>Audit Plan</b>		
<b>FACILITIES &amp; CAPITAL PROJECTS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Facilities Maintenance	H	H	L	L			
Construction Planning and Monitoring	M	M	L	L			
Final Building Projects Reports	H	H	L	L			
<b>CAPITAL ASSETS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Acquisition, Disposal and Capitalization Policy	H	H	L	L		✓	
Inventory Tracking	H	H	M	M		✓	
<b>FOOD SERVICE OPERATIONS</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Federal and State Reimbursement	M	M	L	L	✓		
Sales Cycle	H	H	L	L	✓		
Inventory and Purchasing	M	M	L	L	✓		
Eligibility Verification	M	M	L	L	✓		
Vending Machines	H	H	H	M	✓		
<b>EXTRA CLASSROOM ACTIVITY FUND</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
General Controls	H	H	L	L			
Cash, Cash Receipts and Disbursements	H	H	L	L			
<b>INFORMATION TECHNOLOGY</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Governance	M	M	L	L			■
Network and Financial Application Security	H	H	L	L			■
Disaster Recovery	H	H	L	L			■
Permissions	H	H	M	L			■
<b>STUDENT RELATED DATA AND SERVICES</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Student Attendance	H	H	L	L			
Student Security and Safety	H	H	L	L			
<b>TRANSPORTATION SERVICES</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
Student Transportation	M	M	L	L			
Transportation Contracts	L	L	M	L			
State Aid	M	M	L	L			
<b>STUDENT SERVICES</b>	05/31/11	05/31/12	05/31/11	05/31/12	10-11	11-12	12-13
STAC	H	H	M	L			
Medicaid	H	H	L	L			

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

**Status of Prior Year Findings**

<b>ACCOUNTING AND REPORTING</b>
---------------------------------

**GASB STATEMENT NO. 54**

Previous Control Risk Level: **Moderate (M)**

Prior Year Finding: During our prior year risk assessment we noted that the District was in the process of developing a policy that outlines the procedures that are to be followed regarding the requirements of GASB Statement No. 54, *Fund Balance Reporting and Governmental Fund Type Definition* which changes the reserved and unreserved classifications of fund balance and replaces them with five new classifications: nonspendable, restricted, committed, assigned and unassigned.

Current Year Status: During our risk assessment update we noted that the District adopted policy No. 6610, *Fund Balance Policy*, which addresses the District's procedures regarding the implementation of GASB Statement No. 54. As such, we have lowered our assessment of control risk from moderate to low.

Updated Control Risk Level: **Low (L)**

\*\*\*

<b>BENEFITS</b>
-----------------

**RETIREE HEALTH INSURANCE**

Previous Control Risk Level: **Moderate (M)**

Prior Year Findings: During our prior year risk assessment we noted the District did not have written policies and procedures to monitor the status of all retirees and their spouses/dependents receiving coverage. Additionally, we noted the District did not have a process to contact the non-Medicare primary retirees, their spouses and/or dependents to obtain updates of their contact and eligibility information.

Current Year Status: During our risk assessment update we noted the District does not have written policies and procedures to monitor the status of all retirees and their spouses/dependents receiving coverage. However we noted the District now has a process to contact the non-Medicare primary retirees, their spouses and/or dependents to obtain updates of their contact and eligibility information. As such, we have lowered our assessment of control risk from moderate to low.

Updated Control Risk Level: **Low (L)**

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

\*\*\*

<b>PURCHASING AND RELATED EXPENDITURES</b>
--

**TRAVEL AND CONFERENCES**

---

Previous Control Risk Level: **Moderate (M)**

Prior Year Findings: During our prior year risk assessment, based on the sample tested, we noted three (3) disbursements contained receipts submitted for reimbursement were not stamped "AUDITED AND PAID" by the claims auditor. Additionally we noted two (2) disbursements did not contain proof of attendance.

Current Year Status: Based on the sample tested during our risk assessment update, four (4) disbursements did not contain proof of attendance. However, disbursements contained receipts submitted for reimbursement were stamped "AUDITED AND PAID" by the claims auditor. As such, coupled with the above factors, we continue to assess the level of control risk as moderate.

Updated Control Risk Level: **Moderate (M)**

\*\*\*

<b>CAPITAL ASSETS</b>
-----------------------

**INVENTORY TRACKING**

---

Previous Control Risk Level: **Moderate (M)**

Prior Year Findings: During our prior year risk assessment we noted the following regarding inventory tracking:

- Periodic inspections were not being performed by the District to determine that all assets are present, in usable condition, located in the assigned area and accurately recorded on the capital asset inventory.
- The Information Technology Department was in the process of updating its inventory of all technology related capital assets.

Current Year Status: During our risk assessment update we noted the following regarding inventory tracking:

- Periodic inspections are not being performed by the District to determine that all assets are present, in usable condition, located in the assigned area and accurately recorded on the capital asset inventory.
- The Information Technology Department is still in the process of updating its inventory of all technology related capital assets.

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

We understand that the District has engaged the services of an outside appraisal company to perform a full capital asset valuation during the next fiscal year. As such, coupled with the above factors, we continue to assess the level of control risk as moderate.

Updated Control Risk Level: **Moderate (M)**

\*\*\*

<b>FOOD SERVICE OPERATIONS</b>
--------------------------------

**VENDING MACHINES**

Previous Control Risk Level: **High (H)**

Prior Year Findings: During our prior year risk assessment we noted the following regarding the District's vending system:

- Meter readings were not monitored for the water vending machine that was operated by the school lunch department.
- The District did not maintain a contract on file with Island Ice Cream.
- It appeared that the Nickerson Vending Company was not removing sales tax for the sales of taxable items contained in several vending machines in the elementary schools and the junior/senior high school that are located in the teacher's lounges.
- The statement of sales that the District received from the vending machine vendors did not provide a detail of the items sold nor did it indicate meter readings.

Current Year Status: During our risk assessment update we noted the following regarding the District's vending system:

- Meter readings are not monitored for the water vending machine that is operated by the school lunch department.
- It appears that the Nickerson Vending Company is not removing sales tax for the sales of taxable items contained in several vending machines in the elementary schools and the junior/senior high school that are located in the teacher's lounges.
- The statement of sales that the District receives from the vending machine vendors does not provide a detail of the items sold nor does it indicate meter readings.

However we noted the District has a contract on file with Island Ice Cream. Additionally, meter readings are now monitored for the water vending machine that is operated by the school lunch department. As such we have lowered our assessment of control risk from high to moderate.

Updated Control Risk Level: **Moderate (M)**

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

\*\*\*

<b>INFORMATION TECHNOLOGY</b>
-------------------------------

**PERMISSIONS**

---

Previous Control Risk Level: **Moderate (M)**

Prior Year Finding: During our prior year risk assessment we noted the following regarding permissions:

- Although the Interim Assistant Superintendent for Business approved new vendors and changes to existing vendors, the vendor change report was not reviewed to ensure that the accounts payable clerk or the part-time accounts payable clerk made only those changes that were approved.
- Our review of user permissions within the accounting information system noted permissions granted to various employees that were not consistent with their job responsibilities. Examples of such permissions included the following:
  - The payroll clerk had access to the earnings schedule in the *Negotiation Manager* module.
  - The secretary to the Director of Facilities, the School Finance Manager, the Director of Technology and the payroll clerk had the ability to convert a purchase requisition to a purchase order.
  - The Director of Technology had access to vendor maintenance.
  - The District Treasurer and School Finance Manager had the ability to delete journal entries. Additionally, the District Treasurer had the ability to delete cash receipts.

Current Year Status: During our risk assessment update we noted the following regarding permissions:

- The payroll clerk no longer has access to the earnings schedule in the *Negotiation Manager* module.
- The secretary to the Director of Facilities, the School Finance Manager, the Director of Technology and the payroll clerk do not have the ability to convert a purchase requisition to a purchase order.
- The Director of Technology no longer has access to vendor maintenance.
- The District Treasurer and School Finance Manager do not have the ability to delete journal entries. Additionally, the District Treasurer does not have the ability to delete cash receipts.
- The Interim Assistant Superintendent for Business reviews the vendor change report on a monthly basis to ensure that the accounts payable clerk or the part-time accounts payable clerk made only those changes that were approved.

As such, coupled with the above factors, we have lowered our assessment of control risk from moderate to low.

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

Updated Control Risk Level: **Low (L)**

\*\*\*

<b>TRANSPORTATION SERVICES</b>
--------------------------------

**CONTRACT**

---

Previous Control Risk Level: **Moderate (M)**

Prior Year Finding: During our prior year risk assessment we noted the *Extension of Contract for Pupil Transportation* for the 2010-2011 school year was not filed with the State Education Department Transportation Unit for transportation relating to athletics and field trips.

Current Year Status: During our risk assessment update we noted the *Extension of Contract for Pupil Transportation* for the 2010-2011 school year was properly filed with the State Education Department Transportation Unit for transportation relating to athletics and field trips. As such, we have lowered our assessment of control risk from moderate to low.

Updated Control Risk Level: **Low (L)**

\*\*\*

<b>STUDENT SERVICES</b>
-------------------------

**SYSTEM TO TRACK AND ACCOUNT FOR CHILDREN ("STAC")**

---

Previous Control Risk Level: **Moderate (M)**

Prior Year Finding: During our prior year risk assessment we noted our testing of STACs related to the summer school handicap program revealed a STAC was not filed for one (1) student.

Current Year Status: During our risk assessment update we noted, based on our testing, the District properly filed the STACs related to the summer school handicap program. As such, we have lowered our assessment of control risk from moderate to low.

Updated Control Risk Level: **Low (L)**

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

**Current Year Testing**

<b>GOVERNANCE AND PLANNING</b>
--------------------------------

**GOVERNANCE AND CONTROL ENVIRONMENT**

---

Current Control Risk Level: **Low (L)**

Reason for Risk Level: We have assessed the control risk for the District's governance and control environment as low based on the following reasons:

- The District has adopted most of the legally required policies, however the District has not adopted an *Animals in the School* policy as required by Education Law §809(b).
- The Board reviewed and readopted the required policies at the reorganizational meeting.

\*\*\*

**COMPLIANCE WITH THE OPEN MEETINGS LAW**

---

Current Control Risk Level: **Low (L)**

Reason for Risk Level: We have assessed the control risk for the District's compliance with the Open Meetings Law as low based on the following reasons:

- After the Board minutes are approved, the District posts minutes on the District's website.
- The Board meeting agenda and supporting documentation is available on the District's website prior to each Board meeting.

\*\*\*

<b>ACCOUNTING AND REPORTING</b>
---------------------------------

**RESERVES AND FISCAL HEALTH**

---

Current Control Risk Level: **Low (L)**

Reason for Risk Level: We have assessed the control risk for the District's reserves and fiscal health as low based on the following reasons:

- The District's reserves are maintained in accordance with related laws and regulations.
- The District maintained an unassigned fund balance within legal limits for the fiscal year ending June 30, 2011 which was 4% of the ensuring year's budget.
- We performed analytics on the District's audited financial statements for the fiscal year ending June 30, 2011, including a review of fund balances, reserves and operating results. Based on this review, we noted the following:

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

- The District maintained a current ratio significantly better than 2 to 1, which is standard indicator of fiscal health. For the fiscal year, the District's current ratio was 3.3. The standard indicator represents for every one dollar the District owes, it should have two dollars available in current assets. As can be seen, the District shows no signs of fiscal stress.
- The District ended the fiscal year with an operating surplus of \$884,913.

\*\*\*

<b>CASH MANAGEMENT</b>
------------------------

**BANK RECONCILIATIONS**

Current Control Risk Level: **Low (L)**

Reason for Risk Level: We have assessed the control risk for the District's bank reconciliation procedures as low based on the following reasons:

- Although the finance manager reviews the monthly bank reconciliations to ensure that the ending book balance, bank statement balance and general ledger balance are accurate, the review is not documented.
- The treasurer prepares a monthly *Treasurer's Report* which indicates the activity within each bank account and ending book balance.
- The treasurer investigates bank transfers to determine that both sides of the transaction have been properly recorded on the books.
- The monthly bank reconciliations and *Treasurer's Reports* are prepared on a timely basis.
- The *Treasurer's Reports* are provided to the Board monthly.
- A sample of treasurer reports and bank reconciliations were reviewed noting the book balance agreed to the trial balance account with no discrepancies.

However we noted old outstanding checks over one year old are being carried on the monthly bank reconciliations for the general fund bank account. As such, coupled with the above factors, we have not assessed the level of control risk higher than low.

\*\*\*

**BANKING SECURITY**

Current Control Risk Level: **Moderate (M)**

Reason for Risk Level: We have assessed the control risk for the District's banking security as moderate based on the following reasons:

- The District has not dedicated and restricted one computer that is to be utilized for processing wire transfers.

**Cold Spring Harbor Central School District  
Risk Assessment Update Report  
For the Period Ending May 31, 2012**

- The banking institutions do not send independent notification, such as an email, of transfers after they have been completed to an appropriate administrator.

While our assessment of control risk is moderate based on the above factors, we also note the following controls, while functioning effectively, did not justify a control risk lower than moderate since we considered the entire control environment in making our assessment

- The District has adopted policy No. 6420. *Electronic or Wire Transfers*, which address the procedures that are to be followed when transferring funds by means of electronic or wire transfers.
- The District utilizes bank issued security tokens to process transfers.
- The District has enabled ACH debit blocks to allow only pre-approved debits on District bank accounts where ACH transactions are processed.
- The District uses *Positive Pay* for the general fund checking account and payroll account.