

Student Directory Information

Internal Audit Report
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BACKGROUND:

In accordance with the Family Educational Rights and Privacy Act (FERPA) and School Board Policy JRA, the following directory information is included in students' school records and is not confidential:

- Name
- Address
- Telephone number, if listed
- Participation in officially recognized activities and sports
- Weight and height, if an athletic team member
- Name of the most recent previous school or program attended
- Dates of attendance at schools in the district
- Diplomas, certificates, and honors received
- Date of graduation
- Date and place of birth

At OCPS, with the exception of participation in officially recognized activities and sports and weight and height for athletic team members, this information is recorded in the student information system, Skyward. The Board may release the above directory information to the general public unless a student's parent/legal guardian submits written notification to the principal within ten (10) days of distribution of the Code of Student Conduct. Releasing student information must be notified annually in the Code of Student Conduct and in a school's handbook.

The following persons have access to student records:

- Board members
- Superintendent and staff
- Professional staff of the school
- Records Management Department staff
- Clerical and secretarial staff designated by the principal
- The parent/legal guardian of the student
- An eligible student
- Other persons authorized in writing by the parent/legal guardian or eligible student

In accordance with the Family Educational Rights and Privacy Act (FERPA), School Board Policy JRA lists student's school records data as student directory information, and who can access this information.

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Following are the established procedures/ forms to request and to release any of the student directory information stored in the student information system via a Student Hub of Educational Data (SHED) report or from Skyward data:

- For development of SHED report, requester (staff or schools) submits Functional Requirement documents to Information Technology services (ITS) through their department BPO and with BPO's approvals.
- For access of SHED data/report, requester submits online HEAT Ticket Form.
- For any information/access other than SHED data/report (e.g. from Skyward), requester submits online HEAT Ticket Form.
- *Student Records Release Authorization Form* or email request needs to be submitted to the Records Management if external parties (e.g. Department of Defense) needs student data. Records Management extracts report from SHED.

ITS receives internal requests for access to Skyward system/student accounts, or correction of student data in Skyward, or for requests of student data from SHED/Skyward, SHED reports.

There was a total of 3,674 internal requests received from July 1, 2022 to October 31, 2022 for student data, training, documentation, BPO guidance, reconfiguration, and upgrades combined. These requests were documented in Structured Query Language (SQL) – CallLog table with Customer ID, Type of Request, Descriptions, Status, Priority, Received Date and Closed Date. There were four external requests received by the Records Management Department during this same period.

OBJECTIVE, SCOPE AND METHODOLOGY:

Objective

The objective of this audit was to determine whether District is complying with policies and procedures and Florida Statutes regarding maintaining and sharing student directory information.

Functional Requirements and BPOs' approvals are needed to develop/release requested SHED report.

HEAT Ticket Form is needed to access SHED data/report.

Scope

The scope of the audit is from July 1, 2022 to October 31, 2022.

Methodology

We conducted this audit in accordance with the *International Standards for the Professional Practice of Internal Auditing* of the Institute of Internal Auditors and included such procedures as deemed necessary to provide reasonable assurance regarding the audit objective. Internal Auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization’s operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.

We are required to note any material deficiencies in accordance with Florida Statutes, School Board Policy and sound business practices. No material deficiencies were noted in this audit. We also offer suggestions to improve controls or operational efficiency and effectiveness.

Details of our audit methodology included:

- Reviewed Student Information Systems (SIS) Standard Operating Procedures (SOPs), School Board Policies related to student data, Management Directives, Notice to Employees, and HEAT service Request Forms;
- Reviewed Functional Requirements Process and SOPs, and other documents related Functional Requirements on Teaching and Learning (T&L) SharePoint – Instructional Process Specialist (IPS) site;
- Discussions with SIS, Infrastructure, Information Security, and T&L Instructional Process Specialist;
- Extracted data using SQL queries of the HEAT System – CallLog (Requested data) and Asgnmnt (Assignment) tables for sampling;
- Selected samples for testing as follows:
 - 14 requests by CallType – *Students*
 - 5 requests by *Student - T&L*
 - 2 requests by *Enterprise Project Office (EPO)*

We conducted this audit in accordance with the International Standards for the Professional Practice of Internal Auditing.

No material deficiencies were noted in this audit.

We extracted internal requests directly from SQL – CallLog table for testing.

We reviewed Functional Requirement documents for the selected sample.

- 4 external requests of student data managed by Records Management internal *Public Records Request (PRR)* database;
- Reviewed Functional Requirements, BPO approvals, and supporting documents for external requests for the selected sample;
- Reviewed Student Hub of Educational Data (SHED) Skyward Report Definitions, SHED Skyward Security, previous IT audit workpapers – *Skyward Interface Audit*, and current Proofpoint Secure Email Procedures; and,
- Reviewed Data Sharing Agreements received from Legal Services and on the Procurement Department’s server.

RESULTS & RECOMMENDATIONS:

Overall Conclusion:

Our overall conclusion is that the District is complying with policies and procedures and Florida Statutes regarding maintaining and sharing student directory information. District Business Process Owners (BPOs) own different elements of student directory information accordingly to their expertise, but there is no “owner” of the information itself or the processes involved. Accordingly, we recommend the district establish overall ownership for student directory information.

1) Business Process Owner (BPO) owns the specific data to provide input and approve the data is being requested and released; however, there is no overall ownership for student directory information.

Moderate Risk, Opportunity

Better Practice:

Data ownership is important for data governance (accessibility, usability, stability and security of data), easier cross-team collaboration, and accountability.

The District is complying with policies and procedures and Florida Statutes regarding maintaining and sharing student directory information.

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Audit Result:

The different student directory information/data are owned by many different BPOs who are the subject matter experts for individual data elements. BPOs assist requesters of student directory information, provide input, analyze the requested data, and approve for releasing data.

However, there is no overall ownership established for student directory information and the processes used to manage it. Fragmented ownership dilutes accountability and can create gaps in control processes. It can also impede process-wide improvements, since the focus is on tasks within a process rather than the overall process.

Overall management of processes provides accountability and assists with process integrity as well as internal control strength.

Recommendation:

Establish overall ownership of student directory information and the processes used in managing it.

We wish to thank the Sr. Instructional Process Specialist, SIS Executive Director, and Assistant Director of ITS Customer Care for their cooperation and assistance with this audit.

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Department / School Name	Information Technology Services/ Curriculum and Digital Learning
Administrator / Department Head	John Davis/ Maurice Draggon
Cabinet Official / Area Superintendent	Mark Shanoff/ Rob Bixler

Audit Result / Recommendation	Management Response Acknowledgement/ Agreement of Condition	Responsible Person (Name & Title) And Target Completion Date	Management's Action Plan
Establish overall ownership of student directory information.	Student Directory Information (SDI) is comprised of several different pieces of data. There are BPOs (Business Process Owners) responsible for each of these individual pieces of data; many of which are in different departments. The BPO over the individual data is the subject matter expert for their specific pieces of data and can best determine the criteria to use when pulling the pieces of data. Because the Internal Audit team acknowledges the departments are in compliance with district	N/A	No additional Action Plan needed at this time.



	policies and Florida Statues, both Curriculum and Digital Learning and Information Technology Services departments disagree with the additional recommendation.		