



# WEST SENECA CENTRAL SCHOOL DISTRICT

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Matthew J. Bystrak  
Superintendent of Schools

July 8, 2019

Mr. Otis Jones, Senior Auditor  
NYS Education Dept. Administrative Support Group  
89 Washington Avenue, Room 2M West  
Albany, NY 12234

Dear Mr. Jones:

Please consider the following as West Seneca Central School District's corrective action plan for the fiscal monitoring desk review that was conducted with respect to the District's 2017-18 Individual with Disabilities Education Act (IDEA) grant program. It is always the District's intention to operate the administration of its grants with complete integrity and transparency and with a strict adherence to all requirements and guidance of the grant. We appreciate the productive meeting we had with you during your recent field visit, as it was extremely beneficial to our understanding regarding the extensive documentation requirements of the Federal Uniform Grant Guidance. West Seneca Central School District has always taken pride in ensuring that all Federal grant funds are spent in a prudent manner. Our existing policies and procedures within which we have operated have helped ensure our compliance with our fiduciary responsibility. We are happy to note that we have not had any findings of undocumented or unallowed expenditures as we take our stewardship of these funds seriously. As a result of our meeting, we realize and recognize that changes to the Federal Uniform Grant Guidance (UGG) demands that in addition to good financial stewardship, the District must also make significant changes and enhancements to our internal written policies and procedures. This will include development of an IDEA Grant Uniform Grant Guidance Manual. Our intent would be to utilize the manual as a resource to assist in the administration of the grant as well as to minimize non-compliance risk factors. As will be outlined below, actions have already taken place or will be taken in the near future.

- **Audit Finding:**

*Conflict of Interest Mandatory Disclosure – District's documentation submitted for review did not include written conflict of interest policy provision or regulations. Subsequent to the field visit monitoring meeting, the district submitted additional documentation, which include conflict of interest policy provision along with Code of Ethics. However, the FY 2017-18 policy does not meet compliance with 200.318.*

- **Implementation Plan of Action:**

*The District currently has in place policies that address conflict of interest as well as a code of ethics. However, as pointed out, these policies were not in complete compliance with § 200.318 of UGG for the period of the audit. The District currently reviews its policies in an ongoing manner, taking into account guidance provided by Erie I Board of Cooperative Education Services. As Erie I BOCES recommended policy does not*

*adequately address UGG, we have communicated that to their officials and expressed our desire for their assistance in developing comprehensive policy and procedures that are in conformance with UGG that would be of assistance to all school districts in the geographic area. In the meantime, Superintendent Matthew Bystrak, Assistant Manager of Finance Janice Lewandowski and Acting Special Education Director Andrew Wnek will work to formulate changes to our policy and procedures that will satisfy the requirements of UGG.*

- **Audit Finding:**

*Appendix II Contract Provisions – District’s procurement policy and procedures submitted for review did not include written procedures or supporting documentation to meet compliance requirement for Uniform Grant Guidance Appendix II Contract provisions.*

- **Implementation Plan of Action:**

*The UGG Appendix II Contract provision (B) requires that all contracts in excess of \$10,000 must address termination for cause and for convenience by the non-Federal entity including the manner by which it will be effected and the basis for settlement. The Business Office moving forward will ensure that all new contracts will include a termination for cause clause in the language. Provision (H) requires that a contract award must not be made to parties listed on the government wide exclusions in the System for Award Management (SAM). During the course of our audit discussion, we provided evidence that the district does indeed consult SAM every grant cycle to ensure that no vendors utilized appear on the exclusion list. In fact, this process was put into place because of the new UGG. We will, however, add this requirement to our internal policy and procedures documentation. Superintendent Bystrak will work with Assistant Manager of Finance and Acting Director of Special Education Wnek to develop the policy and procedures documentation.*

- **Audit Finding:**

*District’s procurement documentation submitted for review did not have any written provision or procedure for compliance with federal requirement 2 CFR §200.321.*

- **Implementation Plan of Action**

*The District will review its current procurement documentation. Superintendent Bystrak, Assistant Manager of Finance Lewandowski and Acting Director of Special Education Wnek will establish written procedures to ensure the District meets the compliance requirements of §200.321, addressing contracting with small and minority businesses, women’s business enterprises, and labor surplus area firms.*

- **Audit Finding:**

*District submitted documentation for its written procedures for allowability of Subpart E cost principles. However, documentation did not address all applicable allowable cost subpart E cost principles considerations, including but not limited to, appropriate citation of pertinent Uniform Grant Guidance regulations and required supporting documentation for each IDEA grant budgetary expenditure to ensure compliance with §200.302 (b)(7).*

- **Implementation Plan of Action**

*As stated previously, the District takes its fiduciary responsibility seriously, and consistent with that responsibility, trains and communicates with all personnel connected with grant management the Subpart E cost principles. In addition, it had developed written procedures to address these principles. Moving forward, the Business Office, under the direction of Assistant Manager of Finance Lewandowski, will review our current written procedures and revise to include sufficient reference, regulatory source citation with required supporting documentation details, to ensure all UGG compliance requirements for each of the IDEA grant budgetary accounts are included to ensure compliance with 2 CFR §200.302 (b)(7).*

- **Audit Finding:**

*District submitted IDEA grant staff time and effort documentation. However, multiple objective staff time and effort documentation must: a.) reflect an after the fact distribution of the actual activity of each employee, b) account for the total activity for which each employee is compensated, c) be prepared at least monthly and must coincide with one or more pay periods, and d) be signed by the employee.*

- **Implementation Plan of Action**

*The district recognized the necessity of documenting IDEA grant staff time and effort, and has been consistently doing so, requiring semi-annual sign offs. After discussion with you, we are now aware of the requirement to obtain monthly time and effort documentation for multiple objective staff. We have already made modifications to our documentation forms. Assistant Manager of Finance in consultation with Acting Director of Special Education will update our written procedures for documentation of personnel expenses to ensure compliance with §200.430 and §200.302 (b)(7).*

We again want to extend our thanks for your time and expertise during the audit. As expressed before, the District wishes to continue our good stewardship of Federal grant funds and welcomes your input to improving our missive.

Regards,



Matthew J. Bystrak  
District Superintendent

C: Diane Beres, President, Board of Education  
Janice Lewandowski, Assistant Manager of Finance  
Andrew Wnek, Acting Director of Special Education  
Stacey Norton, Business Affairs Specialist