

# Hudson City School District

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December 22, 2021

Ms. Lisa Reynolds, Chief Examiner  
Office of the State Comptroller PSU  
CAP Submission  
110 State Street, 12th Floor  
Albany, New York 12236

Dear Ms. Reynolds,

Please accept this Corrective Action Plan (CAP) from the Hudson City School District, in response to the findings for the IT audit **Report of Examination Number 2020M-157**.

On behalf of the Board of Education and administration, I would like to once again thank the assigned staff for their professionalism while conducting the audit. We welcome the feedback provided that will assist us to improve our policies and practices related to information security and privacy measures.

Following is the information required for the Corrective Action Plan in response to the seven (7) identified areas in need of improvement.

**Audit Recommendation No. 1:**

***The Board should require timely implementation of corrective action in response to the CPA report and this report on IT controls.***

**Implementation Plan of Action:**

The CPA report and the Report of Examination 2020M-1577 Information Technology recommendations will be implemented in a timely manner. Some Corrective Action Plan (CAP) recommendations have already been implemented at the time of this response. The complete Corrective Action Plan (CAP) will be implemented in a timely manner as indicated below.

**Implementation Date:**

The Corrective Action Plan will be completely implemented by December 2021.

**Person(s) Responsible for Implementation:**

Jonathan (Jesse) Boehme, School Business Administrator; Cheryl Rabinowitz, Manager for Instructional Technology



**Audit Recommendation No. 2:**

*The Board should adopt comprehensive IT security policies to address passwords, wireless security and mobile and removable devices and communicate all adopted IT policies to District officials, employees, and the IT service provider.*

**Implementation Plan of Action:**

The following IT policies have been updated to address IT security for passwords, wireless security, and mobile and removable devices were adopted by the Board of Education on June 15, 2021:

1. [4526 Computer Use in Instruction Policy](#)
2. [4526-R Computer Use in Instruction Regulation](#)
3. [4526-E Computer Network Acceptable Use](#)
4. [4526.1 Internet Safety Policy](#)
5. [4526.1-R Internet Safety Regulation](#)

The above Policies, Regulations and Exhibits were shared via written communication to District officials, employees, and the IT service provider on June 22, 2021 and will be shared again on September 1, 2021 prior to the start of the 2021-22 school year. These policies are attached to this letter and may also be located on the district website at [www.hudsoncsd.org](http://www.hudsoncsd.org) under the Board of Education tab.

**Implementation Date:**

June 22, 2021 and September 1, 2021

**Person Responsible for Implementation:**

Cheryl Rabinowitz, Manager for Instructional Technology; Dr. Maria Lagana Suttmeier, Superintendent

**Audit Recommendation No. 3:**

Develop a Personal, Private or Sensitive Information (PPSI) policy and inventory by classifying all District data and identifying where it is stored in the computer system and who uses it. Also, periodically review and update the inventory.

**Implementation Plan of Action:**

The following policy, regulation and exhibits were adopted by the Board of Education on January 5, 2021 to address and protect Personal, Private or Sensitive Information (PPSI):

1. [8635 Information and Data Privacy, Security, Breach and Notification](#)
2. [8635-R Information and Data Privacy, Security, Breach and Notification Regulation](#)
3. [8635-E.1 Parent's Bill of Rights for Student Data Privacy and Security](#)
4. [8635-E.2 Parent Bill of Rights for Student Data Privacy and Security Third Party Contractor Supplement](#)

A PPSI Data Repository inventory, classifying the District's Personal, Private or Sensitive Information (PPSI) data and identifying where it is stored on the network and cloud repositories and who has access to the data will be developed by December 1, 2021, updated regularly and reviewed annually.

**Implementation Date:**

The Policy, Regulation and Exhibits were adopted by the Board of Education on January 5, 2021, shared via written communication to District officials, employees and the IT service provider on or about January 7, 2021 and are located on the district website at [www.hudsoncsd.org](http://www.hudsoncsd.org) under the Board of Education tab. The PPSI Data Repository Inventory will be completed by December 1, 2021.

**Person Responsible for Implementation:**

Cheryl Rabinowitz, Manager of Instructional Technology in collaboration with IT Service Provider, Questar III IT Team

**Audit Recommendation No. 4:**

*Develop and test a comprehensive disaster recovery plan that identifies key personnel, including data backup procedures and offsite storage, and test the plan to ensure it works as intended.*

**Implementation Plan of Action:**

A comprehensive disaster recovery plan will be developed and documented that identifies key personnel, including data backup procedures and offsite storage. The plan will be tested to ensure it works as intended. The District is in the process of procuring additional infrastructure, servers, and software to expand the backup and recovery capabilities for all critical District data and systems.

**Implementation Date:**

The Disaster Recovery Plan will be adopted by the Board of Education by December 2021. New equipment and backup systems critical for recovery will be phased in by December 2021 to achieve the plan requirements.

**Person Responsible for Implementation:**

Cheryl Rabinowitz, Manager of Instructional Technology in collaboration with IT Service Provider, Questar III IT Team

**Audit Recommendation No. 5:**

*Develop written procedures for managing system access that include periodically reviewing user access and disabling network user accounts when access is no longer needed.*

**Implementation Plan of Action:**

Currently a protocol is in place for enabling and disabling accounts. The IT Department regularly obtains staff and student information to ensure only active staff and student accounts remain active. A written procedure will be prepared for managing system access that includes periodically reviewing user access and disabling network user accounts when access is no longer needed.

**Implementation Date:**

A written procedure will be developed by July 1, 2021

**Person Responsible for Implementation:**

Cheryl Rabinowitz, Manager of Instructional Technology in collaboration with IT Service Provider, Questar III IT Team

**Audit Recommendation No. 6:**

*Design and implement procedures to monitor the use of IT resources, including personal use, for compliance with the AUP.*

**Implementation Plan of Action:**

Written IT procedures will be developed and implemented that includes monitoring the use of IT resources including personal use. An Acceptable Use Policy was developed and adopted by the Board of Education on June 15, 2021. All students/parents are required to review and sign this policy annually. Faculty/staff are required to review and sign this policy by September 2021 and new employees upon employment.

**Implementation Date:**

By September 30, 2021

**Person Responsible for Implementation:**

Cheryl Rabinowitz, Manager of Instructional Technology in collaboration with IT Service Provider,  
Questar III IT Team

**Audit Recommendation No. 7:**

*Provide periodic IT security awareness training to all employees who use IT resources that includes guidance on the importance of appropriate computer use.*

**Implementation Plan of Action:**

The district will provide annual Cyber Security Awareness and PPSI training to all Hudson City School District Staff and Administrators.

**Implementation Date:**

By September 30, 2021

**Person Responsible for Implementation:**

Cheryl Rabinowitz-Manager of Instructional Technology in collaboration with IT Service Provider,  
Questar III IT Team and in collaboration with the Office of School Improvement.

If you have any questions about the information contained in this Corrective Action Plan, please do not hesitate to contact me.

Sincerely,



Dr. Maria Lagana Suttmeier, Ed.D.  
Superintendent of Schools

Cc: Carrie Otty, Board President  
Jonathan (Jesse) Boehme, School Business Administrator  
Cheryl Rabinowitz, Manager of Instructional Technology