



Dr. Christina M. Kishimoto
Superintendent

Date: February 21, 2017

To: Denise Green

Re: Response to Complaint Under GPS Policy KE - Submitted February 11, 2017

Ms. Green,

Your complaint filed to Board Members via email on February 11, 2017 was referred to me by Board President Rogers for an administrative response.

In regards to the posting of GPS voucher reports on line with sensitive or protected information, the district finance staff took immediate action to correct information that should not be posted publicly, and they researched the cause of the error. In addition to taking immediate corrective action, the finance staff conducted a review of procedural guidance and training provided to staff responsible for digitally inputting information that generates these public records. Additionally, the finance staff reviewed our legal requirements with our auditors. As a result of these reviews, we are making the following adjustments that will add safeguards within our procedural steps:

Purchase Requisition Entry Process

The purchase requisition entry and approval process has been revised for staff to address the identification or listing of protected, confidential and sensitive personal information on the Detailed Report of District Expenditures Report published on the District's website. Examples of protected and confidential information include student names, student ID numbers and any information that can be used to link a parent to their child's special programs such as Special Education or McKinney Vento in relation to student refunds, reimbursements or payments.. Additionally, sensitive personal information such as social security number, date of birth and driver's license number are reflected in this guidance.

The Detailed Report of District Expenditures Report utilizes line item descriptions from purchase orders and line item costs from invoices. The revised process shifts entry of protected, confidential or sensitive information required for accounting records and auditors to other fields in the financial system. The information in these fields will not be reported on the Detailed Report of District Expenditures Report.

Parent as Vendor

If a parent is the recipient of a payment from the district, their name will continue to appear on the report as they are considered a "vendor". The District consulted with its audit firm on the issue of listing a parent's name if they receive a payment from the school district. It is their opinion, based on requirements in Arizona Revised Statute § 41-725, that a parent receiving



Dr. Christina M. Kishimoto
Superintendent

payment from the school district is a vendor and subsequently their name should be listed in the expenditure report.

Training Review with Purchase Order Originators

The new process focuses on working closely with purchase order originators (primarily administrative assistants) to appropriately enter protected, confidential and sensitive information. Additionally, we will work with purchase order approvers (at the school level and Finance Department) to more closely monitor purchase order line item descriptions.

Administrative assistant staff training regarding the new process has been initiated. The new process has been communicated to administrators and will be reviewed with all the Principals at next week's Professional Learning Committee meetings.

Thank you for bringing this matter to the administration's attention.

Dr. Christina M. Kishimoto
Superintendent

cc: GPS Governing Board