## **Audit Committee Certificate**

July 13, 2023

To the Rector, Wardens, and Vestry of St. Paul's Episcopal Church, Salem, OR

Subject 2019, 2020, and 2021 Audit of St. Paul's Episcopal Church

We have inspected the statements of financial position of St. Paul's Episcopal Church as of December 31, 2019, December 31, 2020, and December 31, 2021, and the related statement of activities and cash flows for those years then ended.

Our inspection was made in accordance with the audit guidelines of the Manual of Business Methods in Church Affairs. The financial statements are prepared on a cash/modified accrual (accrual being the preferred method) basis in accordance with principles adopted by the Episcopal Church and approved by its General Convention except as noted in the accompanying documentation.

We have taken steps to see that the accompanying financial statements present fairly, in all material respects, except as noted above, the financial position of the Congregation at December 31, 2019, December 31, 2020, and December 31, 2021; and that the changes in its net assets and its cash flows for those years then ended are in accordance with the principles authorized by the General Convention of the Episcopal Church on a basis consistent with that of the preceding year.

Our inspection and certificate are not meant to be construed as an audit and opinion rendered by a Certified Public Accountant.

| Sincerely,           |                            |
|----------------------|----------------------------|
| The Audit Committee: |                            |
|                      |                            |
|                      | Elizabeth Steinberg, Chair |
|                      |                            |
|                      | Rick Bonacker              |
|                      |                            |
|                      | Linda Gilbert              |

#### **AUDIT COMMITTEE FINDINGS ON POLICIES AND PROCEDURES**

July 13, 2023

To the Rector, Wardens, and Vestry of St. Paul's Episcopal Church

We would like to acknowledge and thank the administrative staff for their timely cooperation and hard work throughout this experience. We recognize that they have a great deal on their respective plates. They are both, especially Dawn Blythe, relatively new to the Church but conducted themselves as if they had been working in the office for many years.

However, this endeavor has not been without significant challenges. Our administrative staff are relatively new to their jobs and have virtually no written procedures or current manuals to assist them in performing their day-to-day duties. The audit committee was also hampered by this lack of written procedures and manuals as we cannot contrast established procedures to actual practice. A further challenge is posed by the mere fact that we were attempting to audit three consecutive years, the most recent of which is 2021. There are no administrative staff or clergy available that were present during 2019 or 2020 and only one administrative staff member was present during 2021.

The audit committee has found little in the way of accounting or authority related audit exceptions for the year ended December 31, 2021. There are discussions and recommendations for Bylaw improvements, the writing of procedures, as well as repeat recommendations from prior audits. The audit committee did not aggressively audit 2019 and 2020 as we did not perceive significant benefit to be obtained by the separate full audits of those distant years. In a memo dated March 13, 2023, we advocated for and received Finance Committee and Father Simon's approval to audit 2021 while simultaneously doing minimal auditing of 2019 and 2020 unless unanticipated findings warranted additional scrutiny of those years. No such findings pertaining to the years ended December 31, 2019 or December 31, 2020 were discovered.

As mentioned above the administrative staff have few written policies and procedures to guide them in their respective job duties. The audit committee was disturbed by this lack of common and useful office documentation. While long time dedicated employees can operate reasonably well without the guidance of said written documents any sudden administrative personnel change creates unnecessary impediments for incoming new employees. During this audit, the office staff was instructed to generate a list of desired written policies and procedures. The list is lengthy and is included as an attachment to this audit report. The office personnel will require substantial assistance in the writing of policy and procedure manuals, and we hope the church will provide the necessary assistance.

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# Action Recommendations Remaining from the 2017 and 2018 Audits

The 2019, 2020, 2021 Audit Committee strongly suggests that the remaining recommendations from previous audits be implemented.

- A complete inventory of all church property, equipment, furniture and fixtures should be conducted. Thereafter, a date and procedure for an annual audit of inventory should be affected. (As of May 2023, there is a first draft of the Property Inventory Policy.)
- The Purchase Approval and Documentation policies should be reviewed, rewritten and explained to all personnel, then followed. (As of May 2023, administrative staff have identified financial policies and procedures that need to be created or updated.)
- The Vestry should approve a policy for establishing and continuing Ministry, Committee, and Guild operations. Further, the Vestry should draw up a Commission for each Ministry, a Charge for each Committee, and a Charter for each Guild, giving each the guidelines, policies and procedures necessary to operate in the Church's name in a limited manner for a period of up to three years. (Effort begun at March 19, 2023 Vestry Retreat)
- Every group, committee, or department should ensure that all payments requested are accompanied by appropriate request forms, properly documented, and signed. Each of these business segments should have an authorized signatory or signatories.

# **Findings and Recommendations**

Topics are in alphabetical order.

# Accounting

## Finding and Effect:

There were no findings regarding the actual financial accounting and records themselves due to Treasurer Kathy Gordon's diligence. There was substantial turnover of bookkeepers during this period, and none were on-site. This combined with the lack of written policies and procedures for staff caused Kathy to spend many hours correcting, completing, and formatting the accounting records.

#### Recommendation:

Dawn Blythe, our recently appointed in-house bookkeeper, has been hired to remediate part of the issue. Colleen Kistler, Parish Administrator, and Dawn have begun the documentation of policies and procedures. This work needs to remain a top priority until completed.

# **Accounts Payable**

#### Finding:

In 2019, 2020, and 2021 there has been significant turnover of key staff responsible for the church's financial accounting. In addition, there is a lack of policy, procedures, and job descriptions available for the new staff assuming these functions.

#### Effect:

This combined with turnover of key staff has placed an undue burden on our Treasurer Kathy Gordon. Reconciliation of accounts and financial reporting were backlogged several months, which resulted in a late filing of our 2021 Parochial report.

#### Recommendation:

Colleen and Dawn have already started the process of documenting policies, procedures, and job descriptions. This needs to remain a top priority in 2023. We are currently caught up, according to both Colleen and Kathy. Both noted the addition of an onsite bookkeeper has been a big help.

# <u>Budget</u>

#### Finding:

Kathy Gordon stated the Budget is just an estimate of expected financial activity. There has, however, been no periodic review by the Vestry. Also, the Bylaws do not adequately address the Budget and Budget Committee.

#### Effect:

The lack of budget oversight reflects deficiencies in the training the Vestry received and their understanding regarding their responsibilities for the oversight of the Parish's finances. Delayed financial reporting amplified this deficiency.

#### Recommendation:

Provide timely financial reporting to the Vestry and incorporate a periodic review of actual expenses to budget in the monthly financial dashboard review in the Vestry meeting agenda. Require training on St. Paul's finances for Vestry members. Update the Bylaws to include the Budget and Budget Committee.

## **Computer Systems**

There are no findings per se as we are following the Internal Control Questionnaire rudimentary requirements for a computer system. There is, however, a need for a more robust Information Technology review, especially in view of recent apparent breaches of Parish members' confidential information.

Attached is *Tentative Outline/Baseline Questions for an Information Technology Audit*, a document that Colleen and Dawn are developing.

## Contracts

We did not complete a review of contracts. The section on contracts in the current Bylaws is overly broad and somewhat vague as to applicability. For example: making a purchase with a credit card is a contractual promise/obligation to pay; a simple service or repair request can also be a contractual agreement and obligation; reserving the church facilities for a wedding or other usage is often through a written agreement.

## Recommendation:

We recommend a thorough review and clarification of this section of the Bylaws appropriate to the various types, nature and function of the contracts most commonly used by the Church.

# **Contribution and Gifts**

2017 Audit noted donations in the Gift Book intake forms were not always complete. The Gift Book was lost for a time, but once rediscovered, Dawn, Kathy Gordon, and Dick Rankin reconstructed the Book digitally. It is now up to date. That said, policy and procedures need to be developed around the receipt of gifts.

## **Expenditures**

## Finding No. 1:

The Bylaws of St. Paul's Episcopal Church Section 8.3.2 indicate that all checks in excess of \$2,000 drawn on Parish special accounts shall be signed by two officers. On November 8, 2021, a check in the amount of \$2,500 was drawn on the Music Guild Checking account but was signed by only one officer.

The term "special accounts" is not defined within the Bylaws, or any other document located by the audit committee. For the purposes of this audit, we assumed that any account other than the operating account is a special account.

#### Effect:

Requiring two signatures on accounts makes it more difficult for an individual to expend church funds inappropriately and assures that at least two individuals are aware of the expenditure.

#### Recommendation:

First, it is recommended that the term "special account" be defined within Bylaw 8.3.2 or that the bylaw be rewritten to make a definition unnecessary.

If the audit committee's definition of a special account is found to be correct we are confident that reminding appropriate individuals of the two-signature requirement on all special accounts will correct any future violation of the rewritten Bylaw.

#### Finding No. 2:

A review of 2019-21 Vestry minutes and motion logs revealed that some motions made to expend funds outside of budgeted funds did not include a fund source or precise amount or adequate description of the purpose of the expenditure. In one case, funds from a future year were committed for use in the current year.

## Effect:

Failure to identify funding sources or exact amounts of the proposed expenditure could result in using an inappropriate account or overcommitting funds from an account.

#### Recommendation:

All motions by the Vestry to expend funds outside of budgeted funds should include the fund source, purpose, and exact amount. No funds from future years should be committed for current year expenses. Bylaws should be expanded to include an approval process for expenditures off budget and over budget.

## <u>Inventory</u>

#### Finding:

The Audit Committee could not find an inventory as recommended in the prior two audits.

## Effect:

Without a current inventory it is difficult to track/replace items for insurance replacement in the event of a fire, theft, or disaster.

#### Recommendation:

Complete an inventory as recommended in prior audits.

(Please see the Property and Equipment Section of this report on page 10 for a more detailed discussion.)

## **Investments**

## Finding: Legacy Account

The terms of the church's restricted Legacy account call for a maximum withdrawal rate of 6.0% of the previous year end balance. On December 31, 2021, the balance on said account was \$3,222,420. Per the terms of the Trust/endowment the balance would allow for a maximum monthly withdrawal of \$16,112. The church was withdrawing only \$13,333 during 2022. However, while 2022/2023 was not a focus of this audit it was noted that based on the account's balance of \$2,528,961 at December 31, 2022 the church should have reduced its monthly withdrawal to \$12,645 beginning in January of 2023 but has continued withdraw \$13,333 each month.

#### Effect:

Withdrawing investment funds in excess of those prescribed by the Trust/Endowment risks reducing those funds' ability to earn investment returns and is contrary to the wishes of the benefactor.

#### Recommendation:

Ideally, the withdrawal parameters should match those prescribed by the Trust/Endowment. We are aware of mixed funds within the Legacy account which may have differing instructions. We recommend a review of the Legacy account be completed as outlined by Kathy Gordon's memo attached to determine the correct withdrawal parameters to set. Updated instructions should be immediately sent to US Bank.

Inflation is and will likely continue to erode the purchasing power of these investment accounts as well as other assets of the church. Maintaining withdrawals at the levels dictated by the terms of the respective trust/endowment is important. However, the church should consider

reducing withdrawals to somewhat below the maximum allowed to combat the effect of inflation. The Vestry should review the use of the Legacy account, per Kathy Gordon's memo.

# Music Programs/Music Guild

#### Finding: Music Fund Account (May Dudley)

The withdrawal terms of the Music Fund account are similar to those of the Legacy Account. During 2020, 2021, and 2022 withdrawals from the Music Fund Account have been in amounts that have not violated the terms of this Trust/endowment. However, due to ongoing investment losses the balance in the Music Fund Account dropped from \$173,177 at December 31, 2021 to \$135,468 at December 31, 2022. Given that drop in value the quarterly withdrawals should have been reduced from \$2,359 to \$2,032 but have remained the same thus far in 2023.

#### Effect:

Withdrawing investment funds in excess of those prescribed by the Trust/Endowment risks reducing those funds' ability to earn investment returns and is contrary to the wishes of the benefactor.

## Recommendation:

Immediately contact US Bank with instructions to reduce the respective withdrawals from the Music Fund accounts to those prescribed by the terms of the Trust/Endowment.

Inflation is and will likely continue to erode the purchasing power of these investment accounts as well as other assets of the church. Maintaining withdrawals at those dictated by the terms of the respective trust/endowment is important. However, the church should consider reducing withdrawals to somewhat below the maximum allowed to combat the effect of inflation.

# **Parochial Report**

#### Finding:

Due to the accounting issues mentioned earlier in this report, the filing of the 2021 Parochial report was late.

#### Effect:

Kathy Gordon notified the Diocese of St. Paul's financial record-keeping issues, and they agreed to work with us in accepting a late report.

#### Recommendation:

The late filing of the Parochial report underscores the need to address and correct bookkeeping issues at St. Paul's. This effort is underway.

# **Policies & Procedures**

#### Finding:

As noted, there are no financial policies and procedures documented. The Personnel Manual has not been updated to current practices.

#### Effect:

Policies and procedures are an important tool for office administration and staff training. Their absence has hindered staff training, financial accounting, and reporting, and has placed additional burden on our Treasurer.

#### Recommendation:

Policies and Procedures are necessary tools for the temporal management of St Paul's business, finance, and staff. Their creation and periodic updating should be a top priority.

# **Property & Equipment**

#### Finding No. 1:

There is no list of fixed assets showing date of purchase and cost. There is no inventory identification procedure in effect. There has been only a partial physical examination of assets within the past 15 years. Further, deeds and titles required by the Diocese are not readily accessible, being most likely in the attic. Administrative staff have drafted a Property Inventory Policy document covering items to be accounted for individually and in groups, and requiring an annual video of the parish exterior and interior.

#### Effect:

Without a fixed asset list and inventory procedure in effect, it is nearly impossible to identify and quantify all the parish's assets for information and insurance purposes. Further, potentially opening the property for more community use underscores the need for a compete asset inventory.

#### Recommendation:

Administrative staff should adopt and Vestry should approve the Inventory Policy, determine what resources are needed to complete an initial inventory and locate all deeds and titles, and find funding within the budget or seek additional funding from the Vestry. The inventory should be completed no later than the end of 2024. Additionally, staff should research and acquire appropriate software to keep the inventory current.

#### Finding No. 2:

Parish properties – the church and rental properties - are currently managed by administrative staff together with the Property Committee and by one person at the Goulet Building.

#### Effect:

There have been inequities and delays in managing both outside properties in terms of routine maintenance and the ability to secure repair services. The properties lack consistent property management, policies, and procedures.

#### Recommendation:

Investigate costs and benefits of directly hiring qualified professional property management. Report to the Vestry, and if approved, request funding in the next budget.

# **Records and Documents**

#### Finding:

The physical records for several years including 2021 are in a disorganized state.

#### Effect:

Finding records for review, audit or other purposes is difficult or impossible until the records can be sorted and organized.

#### Recommendation:

A part time staff person was hired in 2022 to begin the process of discovery, sorting, and organization. She is making headway; we recommend this position continue until the records are deemed to be in a satisfactory state.

# **Rectors' Discretionary Account**

Although not rising to the level of an Audit Finding the following was noted as an atypical event involving the Rectors' Discretionary account. On October 12, 2021, a deposit of \$5,000 was made to the subject account at US Bank. Subsequently on October 13 and 25, 2021, and November 28, 2021, checks were written to and negotiated by one individual church member totaling \$4,800. Two of the checks noted "rent and gas assistance". It is decidedly unusual for an individual to be the recipient of such a relatively large gift. In addition, it is preferable for obvious reasons, that checks be written to the vendor or landlord whenever possible.

Given the church's history of misuse of the Rectors' Discretionary account a procedure consistent with the Episcopal Church Business Manual and Canons for monitoring and/or reporting its activity should be developed.

# **2021 Audit Committee Bylaws Review**

The primary sections in our Bylaws pertaining to management and oversight of St. Paul's finances are "Section 8.2 Signature to Documents" which addresses signatures to documents, and "Section 8.3 Signing of Checks" which addresses check signing authority.

- Section 8.2 Signature to Documents is too broad as it includes Promissory notes, contracts, or other formal legal documents.
  - Recommend each document type be broken out into its own section and expanded:
    - Promissory note should include the Vestry's authority to incur debt.
    - Contracts should be more specific. As written, this section would preclude the Parish Administrator from securing services or even making some purchases. For example, a service order for repair is usually a contract obligation; purchasing a service such as lawn maintenance or even a software purchase can entail a contract.
- Section 8.3 Signing of Checks. This section should be changed and expanded to include signing/transfer authority on all of St. Paul's accounts and financial instruments including, but not limited to:
  - Checking accounts, including checks, Automated Clearing House transactions, and debit card transactions.
  - Savings accounts, including both passbook and money market accounts.
  - o Time certificates and other similar investment instruments.
  - o Investment accounts, including those utilized for our Endowment.
- Bylaw 8.3.2 should identify "Special Accounts" (accounts outside of the Operating Account) such as the Music Fund, Legacy Fund, and Clergy Discretionary accounts and define any processes/procedures/protocols specific to the handling of each specific Special Account.
- Add section on Budgetary process, specifically approval process for expenditures over or outside of budget.
- Audit Committee should be a Standing Committee in the Bylaws. Membership should be a minimum of three but not more than six Parishioners.

# Attachment 1 – Staff policy and procedures master checklist

(As of June 21, 2023)

# Financial Policies and Procedures to Create or Update:

- Deposit procedure
  - Who counts? Who verifies?
  - o Print and Scan deposit slip and transaction list
  - How often?
  - o Filling out bank bags, deposit slips, etc
  - Language on how long to hold before depositing, etc
- Cash
  - Storage pre-deposit
  - Chain of custody
- Pledge procedure
  - How do we collect?
  - How do we record?
  - How long to keep cards?
- IRA Distributions procedure
  - o Recorded to individual as gift
  - Vestry approval
  - o Finance Committee approval
  - Finance Team application
- Contribution and Donation receipt procedure
  - o Any kind of record of receipt before processing in deposit?
- Check writing record procedure
  - For coding
  - Should all checks come out of Realm, rather than checkbook (i.e.: Assoc. Rector's Account)
- Who handles money or financial records? Policy
  - Background checks
  - o Money and finance access agreements
  - Training required
- Money and record handling training procedure
- Payroll procedure
  - o Timecard due date
  - o Month dates? (is it 1-30 or 23-22)

- Update Onboarding Docs
- Update Timesheets Paylocity App?
- How to for Paylocity, verification, record keeping, etc
- Bill pay and Contracted Vendor payment procedure
  - o Who
  - Recorded where?
  - Oversight?
- Bank reconciliation procedures
- Journal Entry and approval
  - o 1 person enters, 1 person approves
- 1099 procedure
- W2 procedure
- Month end journal entry procedures
- Bank statement and financial procedure / policy?
- Financial transparency policies
  - Dashboard
  - o Reports
  - Website
  - o Annual audit report
  - Finance Committee minutes?
- Bank signer and authorization procedures and policies
  - Who is eligible to be a signer?
  - Who to contact to authorize signer.
  - Form examples
- Coding Procedures
  - How to code purchases and income
- Budget and Overage Approval
  - Overage cap?
  - What needs approval?
  - Who approves and in what order?
- Reporting to Vestry
  - Monthly dashboard
  - Quarterly full financials?
- Investigation of discrepancies
  - o Deposit
  - Journal entries

- Credit cards
  - Who has cards?
  - What spending limit?
  - Who approves?
- Debit cards
  - When to give vs credit card
  - o Spending limit
  - o Reporting
- Investments
  - o Changes
  - o Sales, distribution of funds
  - Authorization
- Music Guild Funds
  - o Payment
  - o Reconciliation
  - o Disbursement approvals
  - Investing
  - Authority and signers

# Youth Policies and Procedures to Create or Update:

- Annual Permission Form
  - o Sharing, submission expectations, etc
- Youth volunteers
  - o Background checks
  - o Driver's license
  - o Other requirements
- Offsite youth
  - o Car requirements?
  - o Driver requirements?
  - Special permissions?
- Photo/Video
  - Included in permission form
  - Language updating
  - Specify use for marketing/promotion
- General safety
  - What requires an additional permission form?
  - What locations/activities are standard?

# Facility Use Policies and Procedures to Create or Update:

- Insurance expectation for renters
  - How often to renew for continual use?
- Pricing?
  - Are nonprofits different?
  - o Incidentals?
  - o Specific activities?
- Use
  - o Scheduling
  - o Space use
  - o Set up and clean up
- How are timing conflicts handled?
  - First come / first served, or mission driven?
- How to record for Outreach/DPA
  - Requirements for DPA?
  - o Calculated cost for StP

#### **Records Policies and Procedures**

- Invoices and record of payment
  - Where to store
  - How long to store
  - How to code
- Safe Church Policy and Procedure
  - List of who is required to complete trainings
  - Repercussions for not completing in a timely manner (30 days?)
  - Who needs what trainings?
- Realm access policy and procedures
  - Who approves access?
  - How to request additional access
  - Who needs what trainings?
- Records Storage Archive Room, Dawn's House of Files, and Attic
  - Checkout procedures
  - Records access policy
  - Records confidentiality agreement policy and procedures
  - Manual of Business Affairs policies and procedures
- Receipt Storage and Filing procedures
  - Coding
  - Location
  - Digitizing and organizing
- Inventory Records
  - For insurance and building use
  - How often to inventory
  - o Forms, etc

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## General Office Policies and Procedures:

- Volunteering Policies and Procedures
  - o Requirements
  - Available volunteer positions and necessary skillsets
  - Required documentation and trainings
  - Non disclosure policies
  - Youth volunteer opportunities and appropriate documentation
- Phone Procedures
  - How to use
  - Messages etc
- Door Procedures
  - Hours of operation
  - When to unlock vs greet through telecom
  - How to use the telecom
- Visitor and Guest Procedures
  - How to greet
  - How to direct
  - o If someone is asked to leave
  - o Emergency situations
  - Vendor interaction and direction
  - Giving out keys / codes
  - When to interrupt meetings, phone calls, etc vs when to take a message
- Pets and Children
  - Policy
  - Procedures for approval
  - o Documentation of presence on site
  - Emergency contact / secondary adult
- Office Closure
  - Communicating office closure
  - When the office is closed
  - o Emergency or Unexpected closure

# Other Administrative Policies and Procedures:

- Building and Liability Insurance
  - List of providers
  - o Renewal dates
  - Inventory
  - o Who reviews, inspects, etc
- Rental agreements
  - o Renewal of leases
  - o Who oversees properties, leases, repairs, etc

## **Communication Procedures**

- Newsletter / Eboard
  - What do
- Website
  - How to edit
  - Who gets permissions
  - What level of editing per week/month/year
- Weekly Printing
  - o Bulletins
  - o Announcements
  - Prayer list
  - o Prayers of the People
- Public File Sharing
  - When to upload
  - o What to upload
  - Where to upload
  - o Permission
- Calendar
  - o Public vs private calendars
  - o Meeting and building use scheduling
  - Cancellations
  - o Priorities of scheduling
  - o Permission sharing
- Policies, Guides, Manuals, Etc
  - Reviewed and approved yearly by Vestry

# **Attachment 2: First Draft of Property Inventory Policy**

In order to maintain a proper inventory, per the requirements of the Episcopal Church Manual of Business Methods in Church Affairs, the following is the policy of property accountability and inventory guidance for St. Paul's Episcopal Church.

# The following items must be individually accounted for:

- Property exceeding \$1000.00 in value, or certain items deemed irreplaceable.
- All information technology systems equipment, such as desk top computers, lap top computer, computer servers, as they contain or may contain personally identifying information of the congregation and/or parish employees.
- Other property designated historically significant.
- Items designated to the inventory of "Art and Architecture" because of significance and/or historical value
- All items used for celebration of Eucharist and which are maintained in the Sacristy
- All musical instruments
- Valuable books
- Valuable garments and other valuable items for religious ceremony, and are worn or used by priests

# The following items may be accounted for in a group or aggregate fashion:

- Office supplies Record location/room and aggregate value
- Office furniture miscellaneous contents Record location/room and aggregate value
- Other furniture and miscellaneous supplies Record location/room and aggregate value
- Other miscellaneous items Record location/room and aggregate value

# Video Inventory:

Annually, parish staff or designated volunteers will video record the exterior and interior of the parish for current inventory purposes. The purpose is to establish a photo record of the parish and its contents for insurance purposes should item(s) be lost, stolen, damaged or should the parish suffer a catastrophic event. The video shall be uploaded to cloud storage so it may be retrievable even if there were to be a catastrophic loss.

# Attachment 3: Tentative Outline/Baseline Questions for an Information Technology Audit

- Who has access to the information technology (computer) system?
  - o Is a list maintained and by whom?
  - Is access based upon a need-to-know basis and who makes those decisions?
  - How often is the user list reviewed and scrubbed?
- Who is the systems administrator?
  - Who has been provided system administrator rights and is the access current?
- Are there security protocols?
  - o Who is the information security officer?
  - What security software is used?
  - Have there been data breaches and if yes, when, what happened, and what was lost?
  - Was personally identifying information lost in a data breach and if yes, were the affected persons notified and how? If not, why not?
  - How was the data breach identified and was law enforcement notified?
  - Are regular systems audits conducted for detection of misuse of the system or introduction of malware?
  - o How often are users the targets of phishing and how was this identified?
- Are passwords shared?
  - o How often are passwords reset, and if not why?
- Are there internal databases that are password protected?
  - What are the databases used for?
  - O Who has access?
  - What information is maintained in the aforementioned databases?
- Are laptop computers taken home or away from the workplace?
  - Are users allowed to use them on home or other locations' networks and if so, what are the security protocols?
- Are hard drives removable and if yes, how are they stored when removed?
- Is removable electronic storage media allowed and under what circumstances?
  - o Is there a security protocol for acquisition of removable storage media?
  - o Is removable storage media virus-scanned each time it is used?
- Are system users required to take annual information security training?
  - Who conducts the training and how is it verified?
- How many computers (desk tops and laptops) are connected to the network?
- Are all computers and IT system components inventoried annually, to include specific individual identification numbers, such as serial numbers or individual bar code numbers?
- Is parish information stored on cloud via cloud service and if yes, what?

- Who has access to cloud stored data?
- Who is the contracted servicer and what are the terms of the contract?
- o Who vetted the service and how?
- Is the current hardwired network bandwidth (from the facility to the web) sufficient for current and future needs?
  - Who is the contracted service provider for internet services?
  - O How was this determination made?
  - Who made the above determination?

This page is a placeholder for Kathy Gordon's investment memo.