
Certified Public Accountants

October 20, 2022

Management and the Board of Education
Niagara Falls City School District, New York:

In planning and performing our audit of the basic financial statements of the Niagara Falls City School District, New York (the "District") as of and for the year ended June 30, 2022, in accordance with auditing standards generally accepted in the United States of America and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, we considered the District's internal control over financial reporting ("internal control") as a basis for designing audit procedures that are appropriate in the circumstances for the purpose of expressing our opinions on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we do not express an opinion on the effectiveness of the District's internal control over financial reporting.

A deficiency in internal control exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A material weakness is a deficiency, or a combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A reasonable possibility exists when the likelihood of an event occurring is either reasonably possible or probable as defined as follows:

- *Reasonably possible.* The chance of the future event or events occurring is more than remote but less than likely.
- *Probable.* The future event or events are likely to occur.

Our consideration of internal control was for the limited purpose described in the first paragraph and was not designed to identify all deficiencies in internal control that might be material weaknesses. Given these limitations, during our audit we did not identify any deficiencies in internal control over financial reporting that we consider to be material weaknesses. However, material weaknesses may exist that were not identified.

During our audit we identified certain matters involving internal control, other operational matters and future reporting requirements that are presented for your consideration. This letter does not affect our report dated October 20, 2022 on the financial statements of the District. We will review the status of these comments during our next audit engagement. Our comments and recommendations, all of which have been discussed with the appropriate members of management, are intended to improve the internal control or result in other operating efficiencies. Our comments are summarized in Exhibit I.

The purpose of this communication, which is an integral part of our audit, is to describe for management and those charged with governance, the scope of our testing of internal control and the results of that testing. Accordingly, this communication is not intended to be and should not be used for any other purpose.

Drescher & Malecki LLP

October 20, 2022

Cybersecurity Risks

The public sector continues to be one of the most vulnerable industries to cyberattacks.

In February 2022, the New York State Association of Counties, the New York State Conference of Mayors, the Association of Towns of the State of New York, and the Center for Technology in Government at the University of Albany, State University of New York released the “Cybersecurity Primer for Local Government Leaders” (the “Primer”).

According to the Primer, the number of local government cyber events reported to the New York State Intelligence Center in 2020-2021 included:

- 46 County Governments
- 22 Municipal Governments
- 11 School Districts
- 6 Emergency Services Organization

The Primer provides resources and information to help local leaders keep pace with growing cybersecurity risks. The Primer also describes a cybersecurity framework developed by the National Institute of Standards and Technology (the “NIST”) that can be used by local leaders to understand and manage cyber risk in their government.

Implementing and maintaining cybersecurity best practices has become a significant challenge for local governments with the growing risks described above. We recommend that the District review the Primer with their information technology management to compare their current cybersecurity framework to the framework developed by the NIST and consider utilizing the resources and best practices described in the Primer.

Future Reporting Requirements

The Governmental Accounting Standards Board (“GASB”) has adopted new pronouncements, which may have a future impact upon the District. These should be evaluated to determine the extent the District will be impacted in future years.

GASB Statement No. 94—The District is required to implement GASB Statement No. 94, *Public-Public and Public-Private Partnerships and Availability Payment Arrangements*, effective for the fiscal year ending June 30, 2023. The objectives of this Statement are to improve financial reporting by addressing issues related to public-private and public-public partnerships arrangements (“PPPs”).

GASB Statement No. 96—The District is required to implement GASB Statement No. 96, *Subscription-Based Information Technology Arrangements*, effective for the fiscal year ending June 30, 2023. The objective of this Statement is to provide guidance on the accounting and financial reporting for subscription-based information technology arrangements (“SBITAs”) for government end users.

GASB Statement No. 99—The District is required to implement GASB Statement No. 99, *Omnibus 2022*, effective for the fiscal years ending June 30, 2023 and 2024. The objectives of this Statement are to enhance comparability in accounting and financial reporting and to improve the consistency of authoritative literature by addressing (1) practice issues that have been identified during implementation and application of certain GASB Statements and (2) accounting and financial reporting for financial guarantees.

GASB Statement No. 100—The District is required to implement GASB Statement No. 100, *Accounting Changes and Error Corrections—an amendment of GASB Statement No. 62*, effective for the year ending June 30, 2024. The objective of this Statement is to improve accounting and financial reporting requirements for accounting changes and error corrections.

GASB Statement No. 101—The District is required to implement GASB Statement No. 101, *Compensated Absences*, effective for the year ending June 30, 2025. The objective of this Statement is to better meet the information needs of financial statement users by updating the recognition and measurement guidance for compensated absences. That objective is achieved by aligning the recognition and measurement guidance under a unified model and by amending certain previously required disclosures.