



Nicole R. Galloway, CPA
Missouri State Auditor

CITIZENS SUMMARY

Findings in the audit of the Missouri Student Information System Data Governance

Background	The Department of Elementary and Secondary Education (DESE) Office of Data System Management is responsible for the Missouri Comprehensive Data System, which includes the Missouri Student Information System (MOSIS), the student-level record system. MOSIS is the main student information reporting system used by DESE to collect student-level data from school districts. The scope of our audit included DESE management's approach to data governance, including information security, privacy, and other relevant internal controls, policies and procedures, and other management functions and compliance issues.
User Account Management	DESE management has not fully established and documented user account management policies and procedures. User account management includes requesting, establishing, issuing, suspending, modifying, closing, and periodically reviewing user accounts and related user privileges. Multiple DESE users are allowed access to the MOSIS system via shared accounts; however, DESE management does not regularly monitor these accounts to ensure actions taken by account holders are appropriate.
Data Collection	Certain MOSIS system data submissions from school districts to DESE include an optional field to collect social security numbers, even when there is no business purpose to include that information. Maintaining personally identifiable information that is not necessary for business functions places students at risk should a data breach occur. By limiting this information to the least amount necessary, DESE may limit potential negative consequences in the event of a data breach.
Breach Response Policy	DESE management has not established a comprehensive data breach response policy, as recommended by the U.S. Department of Education. Without a comprehensive data breach response policy, management may not be sufficiently equipped to respond quickly and effectively in the event of a breach, increasing the risk of potential harm to affected individuals.
Business Continuity Plan	DESE established a comprehensive business continuity plan in 2004; however, the plan has not been updated or tested, increasing the risk the plan may not be adequate to support the timely recovery of business functions after the occurrence of a disaster or other significant incident. Without an up-to-date or tested business continuity plan, management has limited assurance the organization's business functions can be sustained during or promptly resumed after a disruptive incident.

In the areas audited, the overall performance of this entity was Good.*

*The rating(s) cover only audited areas and do not reflect an opinion on the overall operation of the entity. Within that context, the rating scale indicates the following:

- Excellent:** The audit results indicate this entity is very well managed. The report contains no findings. In addition, if applicable, prior recommendations have been implemented.
- Good:** The audit results indicate this entity is well managed. The report contains few findings, and the entity has indicated most or all recommendations have already been, or will be, implemented. In addition, if applicable, many of the prior recommendations have been implemented.
- Fair:** The audit results indicate this entity needs to improve operations in several areas. The report contains several findings, or one or more findings that require management's immediate attention, and/or the entity has indicated several recommendations will not be implemented. In addition, if applicable, several prior recommendations have not been implemented.
- Poor:** The audit results indicate this entity needs to significantly improve operations. The report contains numerous findings that require management's immediate attention, and/or the entity has indicated most recommendations will not be implemented. In addition, if applicable, most prior recommendations have not been implemented.

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