

WOCO Site Review Report

PRODUCED ON BEHALF OF

THE DEPARTMENT OF EDUCATION AND WORKFORCE

BY

THE MANAGEMENT COUNCIL

OCTOBER 31, 2023

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Overview and Executive Summary

Rules in Ohio Administrative Code (OAC) section 3301-3-05 direct the Ohio Department of Education and Workforce (Department) to implement an accountability system to evaluate the delivery of core services by Ohio Education Computer Network (OECN) Information Technology Centers (ITCs). The Department is advised by the OECN Accountability Committee (made up primarily of ITC Directors) as to the content and process of ITC site reviews. The Department has elected to sponsor and subcontract coordination of site reviews to the Management Council (MC); the MC coordinates site reviews on behalf of the Department as a component of the accountability system. It should be noted that the scope of the site review process is not equivalent to a financial or performance audit, or legal review, and should not be construed as such. A site review encompasses a high-level examination of multiple aspects of an ITC, including state and federal compliance, governance, policies, finance, customer service, technology, security, and strategic initiatives of the ITC. Members of the review team include several ITC Directors who use their collective experience to guide the observations and suggestions noted within this report.

The participation of the administration, staff, and members of the ITC is a critical part of conducting an ITC site review. The review team commends the administration, governing board, staff, and clients of the Western Ohio Computer Organization (WOCO) for graciously responding to this assessment. The review team appreciates contributions made by the executive director and WOCO staff for their assistance in preparing for this review and for the warm hospitality they provided.

The ITC review team is not charged with directing specific actions for an ITC to follow, nor would it be appropriate for the review team to be accorded such latitude. The review reflects a point in time; the review team is positioned to document activity and feedback, then subsequently provide general guidance based on that point in time after a review of responses, data, and policy documents. It is the function of the review team to provide information and suggest prioritizing alternatives by offering recommendations and noting compliance irregularities, which may be considered by the owner-members in determining the future direction of the organization.

The Management Council ITC Accountability Committee works cooperatively with the Department to develop ITC operating standards. The ITC standards were extensively updated and refined during fiscal year 2022 to increase transparency about standards for the ITC, enhance baseline expectations, and ensure uniformity and fairness in the site review process. The new standards are grouped into administrative, customer support, financial, and technical sections, and a detailed report of each section is included with this report.

The welcoming environment encountered for this review aided in the work of the review team. WOCO clients participated in customer focus sessions, giving the review team valuable feedback from which to draw conclusions, as did the WOCO staff, administration, and governing board members.

Overall, WOCO exhibited well-managed operations, with appreciation expressed by clients regarding the services and support offered by WOCO staff. Noted in the commendations section is WOCO's fiscal stability, 100% compliance with Ohio Administrative Code requirements, and general success meeting

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the administrative, fiscal, and technical best-practice site review standards. Building on this solid foundation, WOCO leadership is well poised to consider the list of recommendations noted in the next section of this report.

WOCO's staff attributed overall customer satisfaction to a shared work ethic focused on customer service, an impression echoed by focus group participants who unequivocally voiced appreciation for the high-quality customer support provided by WOCO.

WOCO will continue to face some of the same challenges faced at all ITCs—technologies are changing quickly and no one vendor has all the solutions; more services and expertise are sought by schools, and the marketplace expands with new providers constantly. Beyond that, the increasing need for capacity while combatting the exponential growth of cyber security actors imposes an added burden on all ITCs. Determining which services to offer and how to best serve the needs of the client districts is causing all ITCs to look at their delivery models. By embracing collaboration across the OECN and beyond, WOCO can continue to provide a robust array of services to its schools.

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Observations

The following observations seek to convey the spirit in which they were shared by customers and staff. Any perceived tone, whether positive or negative, should not be attributed to the review team unless specifically noted.

1. WOCO met 86 out of 110 recommended best practices and standards:
 - a. 28 of 28 Ohio Administrative Code requirements
 - b. 4 of 4 Customer Service standards
 - c. 15 of 25 Administrative standards
 - d. 5 of 9 Financial standards
 - e. 34 of 44 Technical standards
2. The unmet standards and best practices center around policies that are not formalized such as minimum carryover and financial forecasts, dissolution of assets, IT life cycle and project management practices, FLSA notations and practices, password policies, CIP and Strategic Plan alignment, and SLA data access.
3. The three or four-person support teams provide a level of coverage that is meeting customer expectations.
4. Staff concurred that the number of staff is adequate.
5. Staff are genuinely happy with the family atmosphere, team approach, and cohesive culture.
6. Staff noted appreciation for feedback received in the annual evaluation process.
7. Staff confirmed that professional development is encouraged and well supported.
8. WOCO collects customer feedback via service tickets, direct conversations, roundtable events, and the annual satisfaction survey.
9. WOCO has no separate strategic plan but relies on the required Continuous Improvement Plan (CIP) for strategic needs, much like other ITCs.
10. Strong financial health: the schedule of services, fee structure, and state subsidy combine to establish a solid financial picture for WOCO.
11. The annual carryover has consistently exceeded the recommended minimum of 20%.
12. WOCO maintains redundant paths to the state backbone.
13. The disaster recovery plan was recently updated.

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Recommendations

While acknowledging the brief time-span and limited scope of a site review, the following recommendations are suggested for consideration by the WOCO board and administration:

1. Contemplate strengthening service level agreement (SLA) parameters, especially initial-response and time-to-resolve, to clarify customer service expectations.
2. Consider including a post-training evaluation/survey to identify potential areas where additional training might be helpful.
3. Consider a customer suggestion to combine documentation into a common “one place to look” resource library.
4. Address the customer suggestion asking that a district be able to view ticket statistics for their district.
5. Review FLSA policy and note exemption status on job descriptions.
6. Consider board action for annual approval of the financial forecast and assumptions.
7. Consider adopting a carryover policy prescribing (at minimum) a 20% annual carryover.
8. Formalize current IT practices into a consistent and documented IT planning process.
9. Formalize and document disaster recovery (DR) plan testing and backup/restore testing.
10. Obtain emergency diesel fuel refill priority status if possible.

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Commendations

WOCO is commended for the following:

1. Exemplary customer service.
2. Forging relationships with peers at other ITCs.
3. Using staff to ensure fiscal office redundancy.
4. Incorporating smaller yearly fee increases rather than irregular and less predictable large bumps.
5. Establishing a reserve fund for IT purchases.
6. The disaster recovery plan is a model document.
7. Proactive effort to maintain current customer contact information.
8. Identifying patterns in tickets to determine training needs.
9. EMIS training addressing differentiated skill and experience levels.
10. Commitment to participating in multiple OECN events, including:
 - a. Management Council Board of Trustees
 - b. ITC Directors meetings
 - c. eFinancePlus committees
 - d. Security Working Group
 - e. EMIS Alliance training events

Administrative Code Requirements

Standard	Compliant? (Yes/No)	ITC Response	Review Team Observation
1. Did WOCO complete and submit the CIP for the current fiscal year by the deadline set by ODE? [OAC 3301-3-07(C)(3)(a)] <i>[Note: This OAC rule states: "The information technology center shall file with the department a continuous improvement plan that meets department guidelines and timeframes as set by the department. The report shall include the information technology center's planned versus actual delivery of core services based upon quality implementation standards. The report shall inform the department-managed accountability system for the OECN. The information technology center shall respond in writing to the department and/or make operational adjustments as directed by the department if deficiencies are noted in the department's review of the continuous improvement plan."]</i>	Yes		WOCO demonstrated compliance.
2. Was WOCO 100% compliant on Ohio Administrative Code OECN rules compliance statements for the current fiscal year? [OAC 3301-3-07(C)(3)(a)] <i>[See note in item 1 above]</i>	Yes		WOCO demonstrated compliance.

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3. Does WOCO publish a current list of ITC services and pricing available to the public on their web site? <i>[OAC 3301-3-06 (A)(7)] [Note: This OAC rule states: "An information technology center shall (7) Post on its website a list of all the services that it provides and the corresponding cost for each of those services."]</i>	Yes		WOCO demonstrated compliance.
4. Is WOCO offering all core services? <i>[Currently defined as EMIS, Fiscal, Student Information, INFOhio/Library Automation, and Network Connectivity]</i> <i>[OAC 3301-3-06 (A)(6)] [Note: This OAC rule states: "An information technology center shall (6) Offer core services to all user entities and provide districts with the opportunity to obtain services on an individual-service basis and not inhibit districts from obtaining services from one or more information technology centers of their choosing."]</i>	Yes		WOCO demonstrated compliance.

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5. Is WOCO organized in accordance with Ohio Revised Code? (As a COG in accordance with Chapter 167, or as a Consortia of School Districts in accordance with section 3313.92) [OAC 3301-3-07 (C)(1)(c))] [Note: These Administrative Code rule and Ohio Revised Code references state the following: <u>OAC 3301-3-07 (C)(1)(c) states:</u> "The information technology center as organized in accordance with either Chapter 167. or section 3313.92 of the Revised Code shall provide a current copy of its organizational agreement(s) for review during the site review specified in paragraph (A)(2) of rule 3301-3-04 of the Administrative Code and upon request by the department and/or the public." <u>ORC Chapter 167 states:</u> "That governing bodies of any two or more counties, municipal corporations, townships, special districts, school districts, or other political subdivisions may enter into an agreement with each other, or with the governing bodies of any counties, municipal corporations, townships, special districts, school districts or other political subdivisions of any other state to the extent that laws of such other state permit, for establishment of a regional council consisting of such political subdivisions." <u>ORC 3313.92 states:</u> "The boards of education of any two or more school districts may, subject to the approval of the superintendent of public instruction, enter into agreements for the joint or cooperative construction, acquisition, or improvement of any building, structure, or facility benefiting the parties thereto, including, without limitation, schools and classrooms for the purpose of Chapter 3323. of the Revised Code, and for the management, operation, occupancy, use, maintenance, or repair thereof, or for the joint or cooperative participation in programs, projects, activities, or services in connection with such buildings, structures, or facilities , including participation in the Ohio education computer network established by section 3301.075 of the Revised Code."]	Yes	WOCO is a council of governments (COG).	WOCO demonstrated compliance.
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6. Does WOCO hold a valid permit and maintain compliance with criteria established for that permit in OAC 3301-3-03? [OAC 3301-3-07 (C)(1)(a)] [Note: This OAC rule states: "The information technology center shall hold a valid permit and maintain compliance with the criteria established for that permit as identified in rule 3301-3-03 of the Administrative Code."]	Yes		WOCO demonstrated compliance.
7. Does WOCO have a policy and/or language in the customer agreement indicating data is owned by the customer and held in trust by the ITC? [OAC 3301-3-06(A)(5)] [Note: OAC rule states: "Ensure that all data acquired on behalf of user entities are held in trust for those entities. Any transfer or release of any user entity's data shall require prior authorization from that specific entity. Upon receipt of district authorization, an information technology center will transfer or return district data without delay or impediment."]	Yes		WOCO demonstrated compliance.
8. Does WOCO have a policy and/or published procedure describing when and how data will be returned to a customer in the event the customer withdraws membership in the ITC? [OAC 3301-3-07(C)(4)(j)] [Note: This OAC rule states: "A written data release policy shall be implemented and communicated by the information technology center. The policy shall describe the process for requesting a release, return, or transfer of data. A release, return, or transfer of data shall occur no later than ten business days following the district's request, unless otherwise specified and agreed upon by both the district and the information technology center."]	Yes		WOCO demonstrated compliance.

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9. Does WOCO have a policy to hold the ITC fiscal agent harmless for any obligations of the ITC? (Excluding cases of misfeasance, malfeasance, or nonfeasance?) [OAC 3301-3-07(A)(7)] [Note: This OAC rule states: "The information technology center's governance document shall contain language that holds harmless the fiscal agent for any liabilities, obligations, claims, damages, penalties, causes of action, costs or expenses relating to the operation and activities of the information technology center. Amounts to be paid in settlement of any such claims or damages, including attorneys' fees and costs and expenses, shall be apportioned among all districts participating in the information technology center to the extent permitted by law."]	Yes	N/A. WOCO employs their own treasurer and does not have an outside fiscal agent.	WOCO demonstrated compliance.
10. Does WOCO have a data retention policy? [OAC 3301-3-07(C)(4)(e)] [Note: This OAC rule states: "A data-retention policy shall be written, implemented, and communicated to all user entities, and shall specify how data are stored and restored and the method for disposal of data."]	Yes		WOCO demonstrated compliance.
11. Does WOCO support and encourage all employees to obtain professional development related to their position as a component of the annual evaluation process? [OAC 3301-3-07(C)(5)(b), (c), and (d)] [Note: These OAC rules state: "(b) All staff shall have training and/or experience necessary to perform the duties contained in their job descriptions, (c) All information technology center staff shall be given the appropriate training for the task assigned, and (d) All information technology center staff whose job assignments are related to the support of technology or technology services shall engage in an ongoing program of in-service relative to their area of assignment. Staff training shall be aligned with the continuous improvement plan of the information technology center and reflect the policies and guidelines established by the local professional development committee (LPDC)."]	Yes		WOCO demonstrated compliance. WOCO staff confirmed that professional development is encouraged and requests to attend training are routinely approved.

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12. For Consortia or COGs employing the services of a fiscal agent, does the governance document clarify that authority rests with WOCO's board and not the fiscal agent? [OAC 3301-3-07(A)(5)] <i>[Note: This OAC rule states: "The information technology center's governing authority shall rest with the board of directors or the governing assembly rather than the fiscal agent."]</i>	Yes	N/A. WOCO employs their own treasurer and does not have an outside fiscal agent.	WOCO demonstrated compliance.
13. Does WOCO governance document describe a process for amending said governance document? [OAC 3301-3-07(A)(6)] <i>[Note: This OAC rule states: "The agreement shall set forth the process of change and define how organizational changes are to occur, including, amending the agreement, changing the fiscal agent, adding and withdrawing membership, and changing officers."]</i>	Yes		WOCO demonstrated compliance.
14. Can WOCO demonstrate, as evidenced by official minutes of governing board meetings, that WOCO's governing board has acted to approve initial and modified appropriations, as well as all fee assessments, contracts, hiring, separation, compensation, and benefits? [OAC 3301-3-07 (B)(1)(c)] <i>[Note: This OAC rule states: "The appropriate governing bodies of the information technology center shall approve all fee assessments, contracts, employee compensation and benefits, as well as initial and modified appropriations, as evidenced by official meeting minutes."]</i>	Yes		WOCO demonstrated compliance.

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15. Is the WOCO fiscal agent/treasurer licensed in accordance with section 3301.074 of the Ohio Revised Code? <i>[OAC 3301-3-07(B)(1)(a)(iv)]</i> [Note: This OAC rule states: "The fiscal agent treasurer or the treasurer employed by a council of governments shall be licensed in accordance with section 3301.074 of the Revised Code." The reference to ORC 3301.074 states: "The state board of education shall, by rule adopted in accordance with Chapter 119. of the Revised Code, establish standards for licensing school district treasurers and business managers, for the renewal of such licenses, and for the issuance of duplicate copies of licenses."]	Yes		WOCO demonstrated compliance. WOCO utilizes the services of two licensed treasurers, one of whom is the formal treasurer of record, to manage the internal fiscal processing needs of the ITC. WOCO is commended for utilizing the expertise of licensed support staff to ensure redundancy in this important position.
16. Are complete and accurate financial reports provided to WOCO's board at each regular meeting? <i>[OAC 3301-3-07(B)(d)(i)]</i> [Note: This OAC rule states: "The board of directors or the governing assembly shall be provided access to detailed fiscal reports for each regular board of directors or governing assembly meeting."]	Yes		WOCO demonstrated compliance.
17. Has WOCO established a schedule of fees for services that, in combination with state subsidy funding, cash reserves, and other sources of revenue, generate operating funds sufficient to meet anticipated expenditures? <i>[OAC 3301-3-07(B)(2)(b)]</i> [Note: This OAC rule states: "The information technology center shall establish a schedule of fees for services that, in combination with state subsidy funding, cash reserves, and other sources of revenue, shall generate operating funds sufficient to meet anticipated expenditures."]	Yes		WOCO demonstrated compliance. The schedule of services, fee structure, and state subsidy combine to establish a solid financial picture for WOCO. WOCO is commended for establishing a reserve fund to level the impact of large IT purchases.

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18. Were WOCO's financial reports showing the fund balance of all funds as of the most recent month closed provided in advance of this site review? [OAC 3301-3-07(C)(3)(c)] [Note: This OAC rule states: "Detailed financial records of the information technology center for the current and previous fiscal year transactions shall be made available to the department during the site-review conducted pursuant to rule 3301-3-04 of the Administrative Code. Financial records shall also be made available to the department within sixty days of the end of the fiscal year in an electronic format as specified by the department."]	Yes		WOCO demonstrated compliance.
19. Were WOCO's financial reports showing the fiscal year ending balance of all funds at the close of each of the preceding two fiscal years provided in advance of this site review? [OAC 3301-3-07(C)(3)(c)] [See note in item 18 above.]	Yes		WOCO demonstrated compliance.
20. Was WOCO's financial report showing the current receivables aging provided for this site review? [OAC 3301-3-07(C)(3)(c)] [See note in item 19 above.]	Yes		WOCO demonstrated compliance.
21. Has WOCO been compliant with the ODE requirement to purchase at least 51% of their K12 bandwidth via the OECN-designated provider over the last 24 months? [Note: This is a K12 Network participation requirement]	Yes		WOCO demonstrated compliance. WOCO has redundant paths to the state designated provider.
22. Does WOCO maintain disaster recovery (DR) and business continuity (BC) plan(s)? [OAC 3301-3-07(C)(4)(a)] [Note: This OAC rule states "A written business continuity plan shall be formulated, reviewed at regular intervals by the governing body of the information technology center, and kept on file at the department."]	Yes		WOCO demonstrated compliance. Recently revised, the WOCO disaster recovery plan is a model document.

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23. Does WOCO maintain fully executed contractual agreements with user entities? [OAC 3301-3-07(A)(9)] [Note: This OAC rule states: "All information technology centers shall maintain fully executed contractual agreements with their user entities. The contractual agreement between the information technology center and its user entities must specify at a minimum the quality implementation standards, as defined by the department, for all core services, as well as any additional fees to supplement state subsidy for the core services."]	Yes		WOCO demonstrated compliance.
24. Does WOCO offer a service level agreement (SLA) for each core service? [OAC 3301-3-07(A)(9) and 3301-3-07(C)(2)(d)] [Note: See note in item 23 above, and also 3307-3-07(C)(2)(d) which states "Contractual agreements shall be executed with user entities across all core service areas specifying the areas of service (e.g. software management, data management, training, problem resolution, documentation, communication and quality of service), responsibilities of the information technology center and the user entity for each area of service, and quality implementation standards for each area of service."]	Yes		WOCO demonstrated compliance. WOCO should strengthen parameters for initial-response and time-to-resolve to clarify customer expectations.
25. Does WOCO utilize helpdesk software to track customer requests across all service areas? [OAC 3301-3-7(C)(3)(b)] [Note: This OAC rule states: "The information technology center shall implement an automated help-desk system with quality implementation standards defined by the department in partnership with the OECN. The system shall, at a minimum, facilitate communication and problem resolution among user entities and escalation to appropriate information technology center staff across the OECN, as well as with the department. The system shall enable the reporting of quality implementation metrics for the core services to the department and provide data for the department-managed accountability system for the OECN."]	Yes		WOCO demonstrated compliance. Focus group participants expressed a desire to view support statistics for their district online/on demand.

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26. Are WOCO's customer requests measured and reported against the defined service level agreement for each service area? [OAC 3301-3-7(C)(3)(b)] <i>[See note in item 25 above.]</i>	Yes		WOCO demonstrated compliance. Focus group participants confirmed that WOCO is providing an exemplary customer service response.
27. Does WOCO's SLA reporting or other evidence demonstrate adequate staffing levels in all service areas? [OAC 3301-3-7(C)(5)(a)] <i>[Note: This OAC rule states: "Staffing levels shall be sufficient to meet the service needs of the user as measured by end-user and staff satisfaction. Personnel assignments shall be made to ensure that user support needs are met and that all core services are successfully delivered."]</i>	Yes		WOCO demonstrated compliance. Staff concurred that the number of staff is adequate.
28. Does WOCO have shared support agreement(s), cross training, or position redundancy to ensure service continuity when staff are absent? [OAC 3301-3-07(C)(5)(a)] <i>[See note in item 27 above.]</i>	Yes	Yes, we make sure within our three or four person teams that all members of the team can, at minimum, contribute a base knowledge when the primary expert is out of the office.	WOCO demonstrated compliance. In addition to in-house cross training and overlapping coverage, WOCO leadership and staff have developed relationships with peers at other ITCs for knowledge assistance when needed. WOCO is commended for this effort.
Administrative Code Requirements Summary			
WOCO is commended for meeting 100% of the standards in this section, which are derived from Ohio Administrative Code requirements. WOCO is also commended for developing peer-to-peer relationships with other ITCs for knowledge sharing and support assistance. While noting that WOCO's customer response performance is exemplary, the review team recommends WOCO should revise their SLA requirements for initial-response and time-to-resolve to clarify customer service expectations.			

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Customer Service Standards			
Standard	Compliant? (Yes/No)	ITC Response	Review Team Observation
1. Does WOCO have a process for broad, annual (or more frequent) input/feedback collection from constituents?	Yes		WOCO achieved this standard. WOCO collects customer feedback using service tickets, frequent customer conversations, roundtable events, and an annual satisfaction survey.
2. Does WOCO host regular user group events in all core service areas?	Yes		WOCO achieved this standard.

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3. Does WOCO provide professional development for customers in all core service areas?	Yes		WOCO achieved this standard. Consider a post-training evaluation/survey to identify potential areas where additional training might be helpful. Consider a customer suggestion to combine documentation into a common “one place to look” library. WOCO is commended for identifying patterns in tickets to determine training needs, and for EMIS training addressing differentiated skill and experience levels.
4. Does WOCO utilize electronic mail, blogs, newsletters, and/or social media tools to share updates and reminders relating to the ITC, the OECN, educational technology, and security?	Yes		WOCO achieved this standard. WOCO utilizes periodic newsletters and frequent department-level email. WOCO is commended for their proactive effort to maintain current customer contact information.

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Customer Service Summary

As noted in an earlier report section, focus group participants confirmed that WOCO is providing an exemplary customer service response.

WOCO hosts frequent user meetings and training opportunities. WOCO may want to consider a post-training evaluation/survey to identify potential areas where additional training might be helpful, and customers suggested a need to combine various existing sources into a common “one place to look” documentation/video resource library.

WOCO is commended for their proactive effort to maintain current customer contact information, for mining service desk ticket information to identify patterns of additional training need, and for offering EMIS training differentiated by skill and experience level.

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Administrative Standards			
Standard	Compliant? (Yes/no)	ITC Response	Review Team Observation
1. Does the WOCO governing board (executive committee) meet at least four times per year?	Yes		WOCO achieved this standard.
2. Does WOCO maintain a set of policies specific to ITC operational needs and Administrative Code requirements?	No		WOCO is not meeting this standard.
3. Does WOCO have a policy prescribing a minimum carryover balance?	No	We do not have a policy that defines a minimum carryover.	WOCO is not meeting this standard. Consider adopting a carryover policy prescribing (at minimum) a 20% annual carryover.
4. Does WOCO have a policy prescribing written annual evaluations for all employees?	Yes		WOCO achieved this standard.
5. Does WOCO have policy prescribing FLSA compliance?	Yes		WOCO achieved this standard.
6. Does WOCO have a policy and/or language in the ITC governance document that clarifies the assets of the ITC are owned by the ITC and not the fiscal agent?	Yes	N/A. WOCO employs their own treasurer and does not have an outside fiscal agent.	WOCO achieved this standard.
7. Does WOCO have a defined process for reporting work hours for non-exempt employees?	Yes	We utilize timesheets for overtime when it becomes necessary due to the workload.	WOCO achieved this standard.
8. Do all WOCO job descriptions note the FLSA exemption status for the position?	No		WOCO is not meeting this standard. Review FLSA policy and note exemption status on job descriptions.
9. Do all WOCO job descriptions note the board approval and/or last review/modification date(s) in the body of the document?	No		WOCO is not meeting this standard.

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10. Are all WOCO employees evaluated in writing at least once each fiscal year?	Yes		WOCO achieved this standard. WOCO staff noted appreciation for feedback received in the annual evaluation process.
11. Has the WOCO employee evaluation process been reviewed or revised in the preceding five years?	Yes		WOCO achieved this standard.
12. Does WOCO evaluation process encourage employees to set professional goals?	Yes		WOCO achieved this standard. WOCO staff confirmed that individual and team goals are established and reviewed as part of the evaluation process.
13. Does WOCO maintain a staffing succession plan and/or have processes in place to ensure continuity if faced with the loss of a key employee?	Yes		WOCO achieved this standard.
14. Has WOCO's governance document been reviewed/updated to ensure it is ORC/OAC compliant in the past five years?	Yes		WOCO achieved this standard.
15. Does WOCO governance document indicate the last revision/approval date within the body of the document?	Yes		WOCO achieved this standard.
16. Does WOCO governance document (or board policy) prescribe what assets will be (or will not be) returned to a member should that member terminate membership?	No		WOCO is not meeting this standard; consider creating such a policy.
17. Does WOCO governance document (or board policy) describe financial obligations of members should the ITC be dissolved?	Yes		WOCO achieved this standard.
18. Does WOCO governance document (or board policy) describe distribution of assets to members should the ITC be dissolved?	No		WOCO is not meeting this standard; consider creating such a policy.

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19. Does WOCO governance document outline the role and responsibilities of the fiscal agent/treasurer?	Yes		WOCO achieved this standard.
20. Are the WOCO ITC Director and staff regularly participating in OECN events (ITC Directors meetings, program advisory committees, Security Working Group)?	Yes		WOCO achieved this standard. WOCO is commended for their commitment and participation in many OECN events, including the Management Council Board of Trustees and Directors meetings, eFinancePlus user groups, the Security Working Group, and EMIS Alliance training events.
21. Does WOCO have a mission and/or vision statement?	Yes		WOCO achieved this standard.
22. Does WOCO maintain a strategic plan?	No		Strictly speaking, WOCO is not meeting this standard. Like many ITCs, WOCO relies on their continuous improvement plan (CIP) to guide strategic initiatives.
23. Is the WOCO CIP aligned to the strategic plan?	No		WOCO is not meeting this standard due to the lack a formal strategic plan document.
24. Was the WOCO strategic plan developed using input from customers, staff, and board?	No		WOCO is not meeting this standard due to the lack a formal strategic plan document.
25. Does the WOCO strategic plan use S.M.A.R.T goals or similar attributes to denote measures, responsibilities, timelines, milestones, and desired outcomes? <i>[S.M.A.R.T is an acronym for Specific, Measurable, Achievable, Relevant, Time-bound]</i>	No		WOCO is not meeting this standard due to the lack a formal strategic plan document.

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Administrative Summary

WOCO is meeting many of the administrative best practices identified in the standards. WOCO employees expressed appreciation for helpful feedback received during the annual evaluation process.

WOCO might benefit from a timely review of governance documents, policies, plans, and job descriptions to clarify FLSA procedures, asset distribution, fiscal carryover, and strategic initiatives.

WOCO is commended for consistent participation in, and leadership provided for many OECN activities and committees.

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Fiscal Standards			
Standard	Compliant? (Yes/No)	ITC Response	Review Team Observation
1. Does WOCO maintain a financial forecast?	Yes		WOCO achieved this standard.
2. Does WOCO financial forecast include a list of assumptions for future revenues and expenditures?	Yes		WOCO achieved this standard.
3. Is WOCO's financial forecast routinely approved by the ITC governing board?	No		Strictly speaking, WOCO is not meeting this standard. The forecast is shared with but not approved by the board. WOCO should consider seeking annual board approval for their financial forecast and assumptions.
4. Does WOCO have a policy prescribing a minimum carryover balance?	No	WOCO does not have a carryover policy.	WOCO is not meeting this standard. Although WOCO's carryover has consistently exceeded the 20% standard, WOCO is encouraged to consider adopting a carryover policy to solidify their existing practice.
5. In the two preceding fiscal years, did WOCO achieve or exceed the carryover balance as specified in the carryover policy?	No	WOCO does not have a carryover policy.	WOCO is not meeting this standard due to the lack of a policy.
6. In projecting the carryover at the close of the current fiscal year, will WOCO meet or exceed the carryover balance as specified in the carryover policy?	No	WOCO does not have a carryover policy	WOCO is not meeting this standard due to the lack of a policy.

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7. For the two preceding fiscal years, did WOCO maintain a fiscal-year-end carryover balance in the general fund and any reserve funds of at least 20% of their annual expenditures?	Yes		WOCO achieved this standard. WOCO's carryover has consistently exceeded this best practice.
8. In projecting the carryover at the close of the current fiscal year, will WOCO maintain a fiscal-year-end carryover balance in the general fund and any reserve funds of at least 20% of their annual expenditures?	Yes		WOCO achieved this standard. WOCO's carryover has consistently exceeded this best practice. WOCO is commended for incorporating smaller yearly fee increases rather than irregular and less predictable large bumps, and for establishing a reserve fund for IT purchases.
9. Is WOCO's receivables aging report devoid of significant or chronic delinquencies?	Yes		WOCO achieved this standard.

Fiscal Summary

The schedule of services, fee structure, and state subsidy combine to establish a solid financial picture for WOCO.

Although WOCO has consistently exceeded the 20% fiscal carryover best practice recommendation, WOCO is encouraged to consider the adoption of a carryover policy to solidify their existing practice. WOCO is also encouraged to make the financial forecast an annual board approval action.

WOCO is commended for incorporating smaller yearly fee increases rather than irregular and less predictable large bumps, and for establishing a reserve fund for IT purchases.

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Technical Standards			
Standard	Compliant? (Yes/No)	ITC Response	Review Team Observation
1. Does WOCO have an IT strategic plan, or IT-specific outcomes in a larger ITC plan?	No		By their own admission, WOCO is not meeting this standard, but they do have a loosely structured planning process. WOCO is encouraged to solidify their practices into a consistent and documented planning process.
2. Does WOCO have a process to gather input from stakeholders – from customers and ITC staff – on technology needs and planning?	Yes		WOCO achieved this standard. WOCO collects user feedback through twice-yearly tech roundtables, numerous one-on-one conversations, and an annual survey.
3. Does WOCO maintain a lifecycle management plan (LMP) for products and services offered by the ITC?	No		WOCO is not meeting this standard. (See the recommendation in item 1 above.)
4. Does the WOCO LMP detail the service, customer, FTE allocation, and budget allocation?	No		WOCO is not meeting this standard.
5. Does WOCO utilize industry-standard project management practices?	No		WOCO is not meeting this standard.
6. Does WOCO have a documented change management process?	No		WOCO is not meeting this standard.
7. Does WOCO have a process for ongoing technology evaluation?	No		WOCO is not meeting this standard.
8. Does WOCO routinely audit telecom and other per-usage cloud service invoices for accuracy?	Yes		WOCO achieved this standard.

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9. Does WOCO maintain a current file of district and vendor contracts?	Yes		WOCO achieved this standard.
10. Does WOCO maintain a staff skills inventory for technical and key support personnel?	Yes		WOCO achieved this standard.
11. Does WOCO maintain current application architecture diagrams?	Yes		WOCO achieved this standard.
12. Does WOCO map problems and incident reporting against their service level agreements (SLAs)?	Yes		WOCO achieved this standard.
13. Does WOCO maintain email contact lists as part of a communications plan?	Yes		WOCO achieved this standard.
14. Does each WOCO downstream K12 connection meet the FCC recommendation of 1Mb/student?	No		WOCO is not meeting this standard. As with many ITCs, bandwidth capacity is determined by the district, not by WOCO. The extent of WOCO's control is to recommend levels based on utilization monitoring.
15. Does WOCO monitor the performance and availability of transport links to connectivity customers?	Yes	WOCO uses [REDACTED] ¹ . Continuous monitoring provided via link down notifications sent through SMS.	WOCO achieved this standard.
16. Has WOCO identified and proceeded to mitigate the impact of network single-point-of-failure risks?	Yes		WOCO achieved this standard.
17. Does WOCO require signed/authenticated approval to create new accounts?	Yes		WOCO achieved this standard.
18. Does WOCO maintain a file of requested and completed account authorizations?	Yes		WOCO achieved this standard.
19. Does WOCO enforce strong/complex passwords?	Yes		WOCO achieved this standard.

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20. Does WOCO require passwords to be changed at least every 182 (or fewer) days?	No	We have focused on password length and complexity rather than password lifetime. It is our belief that a short password lifetime is a <u>not</u> a best practice from a security perspective.	WOCO is not meeting this standard as strictly defined. However, WOCO's password length and complexity practice follows industry standards.
21. Does WOCO maintain a process to identify and expire old and/or unused accounts and passwords?	Yes		WOCO achieved this standard.
22. Does WOCO encrypt data at rest?	Yes		WOCO achieved this standard.
23. Does WOCO audit for outdated/vulnerable encryption cyphers and have plan to mitigate these risks?	Yes		WOCO achieved this standard.
24. Does WOCO have an established plan to annually (or more frequently) review and re-validate firewall rules?	Yes		WOCO achieved this standard.
25. Does WOCO internally monitor system availability?	Yes		WOCO achieved this standard.
26. Does WOCO externally monitor system availability?	Yes		WOCO achieved this standard.
27. Has the WOCO DR plan been tested in the previous 12 months?	Yes		WOCO achieved this standard. While technically compliant, WOCO is encouraged to formalize and document their DR testing procedures.
28. Did the WOCO DR and/or BC plan(s) include a current emergency contact list?	Yes		WOCO achieved this standard.
29. Is a copy of WOCO's DR/BC plan(s) stored offsite?	No		WOCO is not meeting this standard.
30. Are items on WOCO's critical equipment list covered by maintenance agreements sufficient to ensure operational status meets or exceeds the terms of the ITC's SLA?	Yes		WOCO achieved this standard.

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31. Are WOCO backups being stored offsite?	Yes		WOCO achieved this standard.
32. Has WOCO tested the backup restore process in the last 12 months?	Yes		WOCO achieved this standard. While technically compliant, WOCO is encouraged to formalize and document their restore testing procedures.
33. Does WOCO have an audited/validated backup retention schedule?	Yes		WOCO achieved this standard.
34. Has WOCO been a regular participant in the OECN Security Working Group?	Yes		WOCO achieved this standard.
35. Is WOCO utilizing a third-party security awareness training platform internally?	Yes		WOCO achieved this standard.
36. In general, is access to WOCO's facility supervised or restricted?	Yes		WOCO achieved this standard.
37. Does WOCO maintain staff work areas that are separate and secured from public spaces?	Yes		WOCO achieved this standard.
38. Is WOCO's data center room secured from non-authorized personnel?	Yes	Access is limited to tech staff and ITC Director.	WOCO achieved this standard.
39. Is access to WOCO's data center room logged?	Yes	Recorded via access fob software. Visitor sign-in sheets are kept as well, with a 180-day retention.	WOCO achieved this standard.
40. Does WOCO data center have at least two sources of electrical power?	Yes	Yes, through the DPL grid with diesel generator backup.	WOCO achieved this standard.
41. If a power source is provided via onsite generator, are WOCO's generator and transfer system tested at least monthly?	Yes	Tests performed every three weeks.	WOCO achieved this standard.
42. Does WOCO maintain a maintenance and testing log for their generator?	Yes		WOCO achieved this standard.

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43. If WOCO's generator is diesel fueled, is it on an emergency refill priority list?	No		WOCO is not meeting this standard. WOCO is advised to obtain emergency diesel fuel refill priority status if possible.
44. Does WOCO's data center room have automated fire suppression?	Yes	Clean agent system installed this summer.	WOCO achieved this standard.

Technical Summary

WOCO demonstrated skilled technology deployment, with feedback from technology coordinators suggesting responsive customer support and a tech staff that is easy to reach.

WOCO is achieving many of the standards used to guide the technical aspects of a site review. Of those that were missed, some, such as downstream bandwidth allocation or the availability of a servicing vendor who can put WOCO on an emergency diesel refuel list, may be outside of WOCO's ability to control.

WOCO is encouraged to solidify their existing technology planning into a mature, consistent, documented, and board-approved practice.

WOCO is commended for the recent refresh of their disaster recovery plan. The layout and contents of WOCO's plan serves as an example of best practice that could benefit other ITCs.

1. *Response redacted to prevent unintended disclosure of details relating to security.*

Appendix A – List of Review Team Members

The following individuals participated in the NEOMIN site review:

- **Dr. James Freeman**, Director, Office of Statewide Technology and Ohio Educational Technology Conference, Ohio Department of Education and Workforce, Site Review Executive Sponsor
- **Geoffrey Andrews**, Chief Executive Officer, Management Council, Site Review Chair
- **Lisa Smith**, Executive Director, ACCESS
- **Ryan Pendleton**, Executive Director, CONNECT
- **Tyler Smith**, Operations Director, SPARCC
- **Matt Calmes**, Director of State Software Development, Management Council
- **Michael Osborn**, Service Desk Project Manager, Management Council
- **Jessica Madison**, Director of Stakeholder Engagement, Management Council
- **Andrew Tompkins**, Stakeholder Engagement Operations Manager, Management Council, Review Coordinator