New York State Comptroller
THOMAS P. DiNAPOLI

Monroe 2-Orleans Board of Cooperative Educational Services

MiFi Usage Billings

2025M-134 | March 2026

Division of Local Government and School Accountability

Contents

Audit Results **1**

Audit Summary 1

MiFi Usage Billings: Finding and Recommendations **3**

Finding 1 – The Assistant Superintendent did not properly monitor and manage MiFi usage billings. 3

Recommendations 5

Appendix A: Profile, Criteria and Resources **6**

Appendix B: Response From BOCES Officials **8**

Appendix C: Audit Methodology and Standards **10**

Audit Results

Monroe 2-Orleans Board of Cooperative Educational Services

Audit Objective	Audit Period
Did Monroe 2-Orleans Board of Cooperative Educational Services (Monroe 2-Orleans BOCES) officials properly monitor and manage MiFi usage billings?	June 1, 2023 – July 10, 2025

Understanding the Audit Area

When a BOCES does not properly monitor and manage technology devices, including MiFi (portable, battery-powered routers that create a local Wi-Fi network for Internet-enabled devices such as laptops or tablets) usage reports, there is an increased risk that both the BOCES and component school districts could be incurring unnecessary costs that are ultimately paid for by component school districts. The Assistant Superintendent of Finance and Operations (Assistant Superintendent) is responsible for Monroe 2-Orleans BOCES' business operations, including overseeing MiFi distribution by Monroe 2-Orleans BOCES employees and Cooperative Service (COSER) activity with component school districts, including MiFi distribution, usage and billing.

During the period of June 1, 2023 through March 31, 2025, Monroe 2-Orleans BOCES incurred approximately $137,000 in monthly service costs for 215 MiFis.

Audit Summary

The Assistant Superintendent did not properly monitor and manage MiFi usage billings. As a result, for the 22-month period examined, Monroe 2-Orleans BOCES unnecessarily paid a total of approximately $28,800 in monthly service charges for 62 MiFis. Component school district officials cannot properly monitor or manage MiFis issued to them and avoid paying for unnecessary MiFis when Monroe 2-Orleans BOCES officials do not provide timely and accurate information regarding the number of MiFis the component school districts are paying for or their usage.

We reviewed the data usage of all 215 Monroe 2-Orleans BOCES MiFi devices and determined that:

- 40 of the 156 MiFis (26 percent) assigned within Monroe 2-Orleans BOCES were unnecessary based on inactivity[1] and incurred monthly service charge costs totaling approximately $18,800.

1 Appendix C includes our methodology for determining the necessity of the MiFis based on activity levels.

- 22 of the 59 MiFis (37 percent) assigned to component school districts were unnecessary based on inactivity and incurred monthly service charge costs totaling approximately $10,000.

In addition, we determined that two of the nine component school districts included $15,000 and $2,500, respectively, in their preliminary 2024-25 fiscal year COSER contracts with Monroe 2-Orleans BOCES, even though neither component school district had active MiFis assigned to them for their 2024-25 fiscal years.

The Assistant Superintendent told us it was an oversight that policies and procedures had not been established for determining when a MiFi was no longer necessary or how that information should be communicated. The Assistant Superintendent also told us that he would develop and implement appropriate procedures to monitor and manage MiFi usage and inventory to help ensure only needed MiFis are being paid for.

The audit report includes two recommendations that, if implemented, will improve the Monroe 2-Orleans BOCES monitoring and management of MiFis. Monroe 2-Orleans BOCES officials generally agreed with our recommendations and indicated they have initiated or plan to initiate corrective action.

We conducted this audit pursuant to Article V, Section 1 of the State Constitution and the State Comptroller's authority as set forth in Article 3 of the New York State General Municipal Law. Our methodology and standards are included in Appendix C.

The Board has the responsibility to initiate corrective action. A written corrective action plan (CAP) that addresses the findings and recommendations in this report must be prepared and provided to our office within 90 days, pursuant to Section 35 of the New York State General Municipal Law, Section 2116-a (3)(c) of the New York State Education Law and Section 170.12 of the Regulations of the Commissioner of Education. To the extent practicable, implementation of the CAP must begin by the end of the next fiscal year. For more information on preparing and filing your CAP, please refer to our brochure, *Responding to an OSC Audit Report*, which you received with the draft audit report. The CAP should be posted on Monroe 2-Orleans BOCES' website for public review.

MiFi Usage Billings: Finding and Recommendations

BOCES officials should establish written policies and procedures that establish clear thresholds for MiFi inactivity to indicate when a device is no longer needed. When the device meets this threshold, officials should take appropriate action to either properly dispose of the device or return it to the vendor to avoid unnecessary expenses. Officials should also maintain accurate inventory records to account for all MiFis and ensure component school districts are billed only for devices assigned to them.

Monroe 2-Orleans BOCES uses MiFis in various situations, including when employees travel to students without Internet access or work from home in areas without Internet service. Monroe 2-Orleans BOCES also pays monthly service charge costs of $38 for each MiFi device assigned to its component school districts through a COSER contract which allows the component school districts to provide portable routers to create a local Wi-Fi network for students who may not have access to the Internet otherwise. Each component school district is responsible for reimbursing Monroe 2-Orleans BOCES for these costs through its final annual contract, which includes all COSERs provided throughout the fiscal year and is based on the preliminary contract prepared prior to the fiscal year.

More details on the criteria used in this report, as well as resources we make available to local officials that can help officials improve operations (Figure 1), are included in Appendix A.

Finding 1 – The Assistant Superintendent did not properly monitor and manage MiFi usage billings.

The Assistant Superintendent did not properly monitor and manage MiFi usage billings. As a result, Monroe 2-Orleans BOCES and the component school districts incurred unnecessary monthly service charge costs totaling approximately $28,800. We reviewed the monthly data usage associated with all 215 MiFis in service during the period June 1, 2023 through March 31, 2025 and determined that 62 of the 215 devices had not been used for a period of at least six months, as follows:

- 40 of the 156 MiFis (26 percent) assigned within Monroe 2-Orleans BOCES were unnecessary based on inactivity and incurred monthly service charge costs totaling approximately $18,800. For example, one Monroe 2-Orleans BOCES department had three MiFis assigned to staff in the department with no usage between February 1, 2024 and March 31, 2025.
- 22 of the 59 MiFis (37 percent) assigned to component school districts were unnecessary based on inactivity and incurred monthly service charge costs totaling approximately $10,000. For example, one component school district had four MiFis with no usage between June 1, 2023 and March 31, 2025, and an additional three MiFis with no usage between June 1, 2024 and March 31, 2025, resulting in approximately $5,100 in unnecessary monthly service charge costs. Another component school district had two MiFis with no usage since June 1, 2023, but added a third MiFi in February 2024. As of March 31, 2025, the three MiFis had no usage and incurred approximately $2,200 in unnecessary monthly service charge costs.

Two Monroe 2-Orleans BOCES employees were assigned to document MiFi monthly usage and maintain an inventory of MiFis issued to Monroe 2-Orleans BOCES staff. However, Monroe 2-Orleans

BOCES officials did not establish written policies and procedures that established clear thresholds for MiFi inactivity to indicate when a device is no longer needed. Furthermore, the two employees were not instructed on how or when to report periods of device inactivity or authorized to determine when a MiFi was no longer necessary and should be deactivated. The Assistant Superintendent told us it was an oversight that policies and procedures had not been established for determining when a MiFi was no longer necessary or how that information should be communicated. The Assistant Superintendent also told us he would correct this oversight and develop and implement appropriate procedures to monitor and manage MiFis.

Additionally, there was no one assigned to document MiFi monthly usage or maintain an inventory of MiFis issued to component school districts. The Assistant Superintendent told us Monroe 2-Orleans BOCES officials did provide each component school district with the number of active MiFis assigned to them as of June 2023 and June 2024. However, Monroe 2-Orleans BOCES officials did not compare these lists against COSER contracts with each component school district or provide component school districts with information on actual device usage or related expenses. Therefore, when component school districts prepared their preliminary COSER contracts with Monroe 2-Orleans BOCES, the amounts budgeted for MiFi service charge costs were generally based on the prior fiscal year's budgeted appropriations and not actual device inventory records or actual device usage and associated service charge costs billed by Monroe 2-Orleans BOCES.

We reviewed COSER contracts for the MiFis issued to the component school districts. We determined that two of the nine component school districts included $15,000 and $2,500, respectively, in their preliminary fiscal year 2024-25 COSER contracts with Monroe 2-Orleans BOCES, even though neither component school district had active MiFis assigned to them for their 2024-25 fiscal years. As a result, the component school districts paid Monroe 2-Orleans BOCES through the COSER contracts for services they did not receive. Had officials at these component school districts been provided with their MiFi usage throughout the year, they would have had better information to properly budget for Monroe 2-Orleans BOCES costs and determine whether they wished to continue with these services.

The Assistant Superintendent told us that a Monroe 2-Orleans BOCES employee was not assigned to maintain inventory records or monitor usage for MiFis issued to component school districts because maintaining inventory records and monitoring usage for devices issued to the component school districts was not Monroe 2-Orleans BOCES' responsibility. However, Monroe 2-Orleans BOCES officials were not providing the component school districts with sufficient information to do these things on their own. The Assistant Superintendent also told us that he would develop and implement appropriate procedures to help ensure only needed MiFis are being paid for. Officials at the component school districts cannot properly monitor or manage MiFis issued to them and avoid paying for devices not issued to them when Monroe 2-Orleans BOCES officials do not provide timely and accurate information regarding the number of MiFis issued or their usage.

Recommendations

1. The Monroe 2-Orleans BOCES Board of Education (Board) and Assistant Superintendent should establish and implement written policies and procedures for the assignment, inventory, monitoring and deactivation of MiFis that include defined roles and responsibilities.
2. The Assistant Superintendent should ensure component school districts are provided with sufficient MiFi inventory and usage information to properly plan for and request the services they are paying Monroe 2-Orleans BOCES for.

Appendix A: Profile, Criteria and Resources

Profile

The Monroe 2-Orleans BOCES is governed by a nine-member Board elected by the component school districts' boards of education. The Monroe 2-Orleans BOCES provides instructional and support programs and services to its nine component school districts at two main locations in Monroe and Orleans counties.

The Board is responsible for the general management and oversight of Monroe 2-Orleans BOCES' financial and educational operations. The District Superintendent is the Monroe 2-Orleans BOCES chief executive officer and, along with other administrative staff, is responsible for day-to-day management. The Assistant Superintendent is responsible for business operations and COSER contract supervision, including oversight of MiFi inventory and usage.

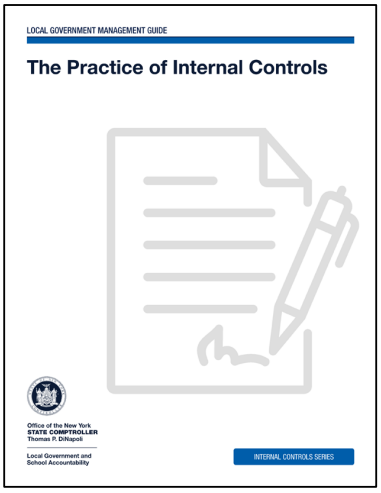
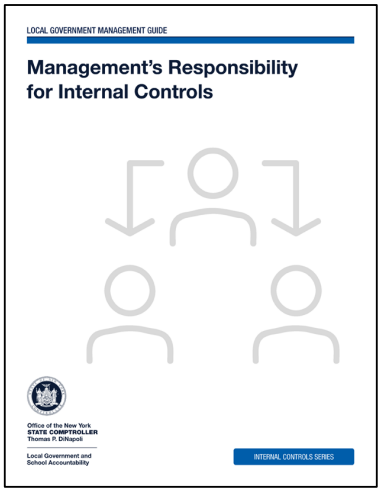
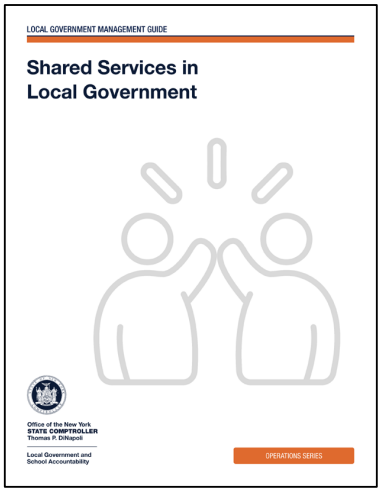
Criteria – MiFi Usage Billings

To help ensure that BOCES officials properly manage and monitor MiFi usage, a BOCES board of education should develop and adopt written policies and procedures that define inactivity thresholds and establish procedures for monitoring and deactivating devices not being used. The BOCES board of education should also require that officials maintain accurate equipment inventory records. These records should identify, at a minimum, the individual to whom each piece of information technology equipment is assigned and, when applicable, the equipment's usage. BOCES officials should use inventory records to help account for all MiFis and to ensure component school districts are billed only for devices assigned to them. Officials should also monitor monthly usage of the MiFis and provide component school districts with their MiFi usage throughout the year to identify obsolete or unnecessary equipment and ensure it is either approved for disposal or returned.

Additional Resources

Figure 1: OSC Publications

OSC *Local Government Management Guides* available on our website to help officials understand and perform their responsibilities.

The Practice of Internal Controls	*Management's Responsibility for Internal Controls*	*Shared Services in Local Government*
		
https://www.osc.ny.gov/files/local-government/publications/pdf/the-practice-of-internal-controls.pdf	https://www.osc.ny.gov/files/local-government/publications/pdf/managements-responsibility-for-internal-controls.pdf	https://www.osc.ny.gov/files/local-government/publications/pdf/shared-services-in-local-government.pdf

In addition, our website can be used to search for audits, resources, publications and training for officials: https://www.osc.ny.gov/local-government.

Appendix B: Response From BOCES Officials

Monroe 2–Orleans
Board of Cooperative Educational Services

Thomas K. Putnam, Ed.D., District Superintendent
Tel: (585) 352-2410
Fax: (585) 352-2442

March 2, 2026

Melissa A. Myers, Chief of Municipal Audits
Office of the State Comptroller
295 Main Street, Suite 1032
Buffalo, NY 14203-2510

Dear Ms. Myers:

The Monroe 2-Orleans BOCES is in receipt of the draft audit report "MiFi Usage Billings" for the period of July 1, 2023, through July 10, 2025, prepared by the Office of the State Comptroller. We have carefully reviewed the findings and recommendations presented and submit this response to the draft report.

Component district and Monroe 2-Orleans BOCES staff members rely on MiFis as a type of technological insurance policy to safeguard against being disconnected from internet access at unforeseen critical moments. Similar to an insurance policy, just because one does not make a claim does not mean that the policy does not have value. Having MiFis provides peace of mind in the form of essential flexibility to gain internet access during unanticipated emergencies which districts need in order to operate efficiently.

The decision as to whether a MiFi is required is one a school district must make solely on its own based on criteria they determine. Monroe 2-Orleans BOCES would not want to be in a position of making business decisions on behalf of component school districts. Thus, we take direction and specific requests from component districts regarding all shared resources, including MiFis. In that context, we supplied the requested number of MiFis during the time period referred to in the draft audit report.

This draft audit report recommended that Monroe 2-Orleans BOCES establish written policies and procedures that establish clear thresholds for MiFi inactivity to indicate when a device is no longer needed. We agree with your recommendations regarding MiFis assigned within Monroe 2-Orleans BOCES and have already taken steps to address the concerns that were identified. With respect to MiFis assigned to component school districts, we will work collaboratively with our component districts to determine an appropriate reporting frequency to inform them of usage levels of those MiFis.

In addition to the above-mentioned topics, Finding 1 of the draft audit report also contained the following:

> *We reviewed COSER contracts for the MiFis issued to the component school districts. We determined that two of the nine component school districts included $15,000 and $2,500, respectively, in their preliminary fiscal year 2024-25 COSER contracts with Monroe-Orleans BOCES, even though neither component school district had active MiFis assigned to them for their 2024-25 fiscal years. As a result, the component school districts paid Monroe-Orleans BOCES through the COSER contracts for services they did not receive.*

The reference in the last sentence contains an inference that we must clarify. At the conclusion of a school year, any funds allocated by a district to be included in their BOCES budget will be returned to that district if not used. Thus, the two component school districts in question received their money back. While we dispute the draft audit report's finding in this instance, we will use the information to cooperatively work with our districts to employ closer scrutiny to preliminary fiscal year COSER contracts regarding MiFis.

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We would like to thank you and your team once again for the professionalism and diligence exhibited through this process. Your thoughtful and thorough approach was a model to our staff. Our goal is to provide responsible service and support to the districts we serve, and we appreciate the assistance your office provides in that regard.

Respectfully submitted,

Thomas K. Putnam, Ed.D.
District Superintendent

Dennis Laba
President, BOCES Board

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Appendix C: Audit Methodology and Standards

We obtained an understanding of internal controls that we deemed significant within the context of the audit objective and assessed those controls. Information related to the scope of our work on internal controls, as well as the work performed in our audit procedures to achieve the audit objective and obtain valid audit evidence, included the following:

- We interviewed Monroe 2-Orleans BOCES officials and staff, including the Assistant Superintendent, Board members, the claims auditor and other employees, to gain an understanding of the procedures pertaining to MiFi assignments, requests, usage and billing within Monroe 2-Orleans BOCES and its component school districts.
- We reviewed inventory records, COSER contracts and claim voucher packets containing original invoices that billed Monroe 2-Orleans BOCES for all MiFis received during the period of June 1, 2023 through March 31, 2025. We determined that Monroe 2-Orleans BOCES officials paid monthly service charge costs for a total of 215 MiFis; 156 were assigned within Monroe 2-Orleans BOCES and 59 were assigned to six of the nine component school districts. We determined each MiFi's data usage and the total monthly service charge costs for all MiFis by reviewing the monthly invoices.
- We analyzed the monthly usage of each MiFi and, using our professional judgment, determined whether any were potentially unnecessary based on periods of inactivity. We classified MiFis as unnecessary if they had no usage for at least the six consecutive months prior to cancelation or, for active MiFis as of March 2025, during the six months preceding that date.

We conducted this performance audit in accordance with generally accepted government auditing standards (GAGAS). Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

Contact

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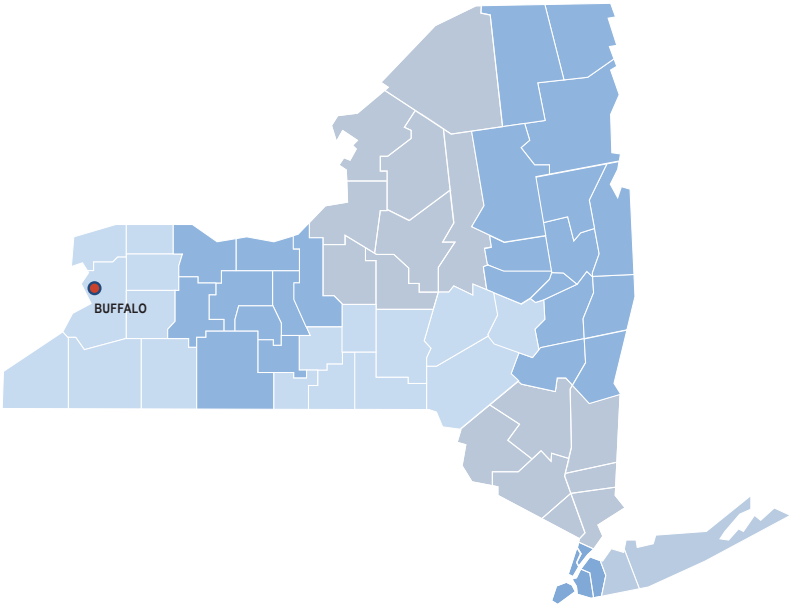

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