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EXECUTIVE SUMMARY

The Office of Internal Audit (OIA) has completed the compliance audit of the Technology Services (TS) Department's Disaster Recovery Plan (DRP) and Business Continuity Plan (BCP). This audit was scheduled on the annual risk assessment plan for School Year (SY) 2022/2023. A previous consultation audit of the TSDRP/BCP was completed on June 30, 2021. A copy of the consultation's final audit report was delivered to the District's Executive Management and an Executive Summary of the consultation was provided to the Governing Board on June 30, 2021.

3. NO WRITTEN DRP/BCP FOR ESSENTIAL DISTRICT DEPARTMENTS
Condition: TS's DRP/BCP manual does not include or identify essential departments and their key procedures.
4. UNDIFFERENTIATED DRP AND BCP PROCESSES, PROCEDURES AND RESPONSIBILITIES
Condition: The TS DRP/BCP does not differentiate between working through disaster versus -0.0c39 ePm ()T1.

management during the audit process and a collaborated effort on the corrections of the audit findings. No MRs are required; however, if management decides to provide them, they become part of the final audit report.

Regardless of the type of internal audit, the IIA performance and implementation standards should be followed when analyzing organizational controls, governance, and risk management.

After a consultation audit it is common practice to schedule and perform an assurance audit. The schedule for the upcoming assessment audit is discussed and agreed upon with management during the exit meeting.

During the exit meeting of the consultation audit, July of 2022 was selected by TS's Executive Management, and agreed upon by Internal Audit, as the date to conduct the assessment audit of the TS DRP/BCP.

Notification of this assurance audit was documented in the conclusions of the final consultation audit report, which read "An assessment audit of the IT DRBCP will be scheduled for approximately one year from the date this final report is delivered to the Superintendent". The report was delivered to the Superintendent on June 30, 2021. This audit was also scheduled in the provided Annual Internal Audit Plan (Audit Plan) for a specified School Year (SY) 2022. The Audit Plan is a worksheet that includes list of audits and their estimated schedule to be performed during the upcoming SY. The Audit Plan for SY 2022 was e-mailed to the Governing Board, Audit Committee, and Executive Leadership on May 13, 2022. The Audit Plan was also presented during the Audit Committee's public meeting on May 20, 2022, in which TS executive managers were present.

The focus of this audit was to review TS's processes and procedures regarding DRP/BCP. It was not intended to reflect or discount the effectiveness or abilities of the TS management or staff. It is noteworthy to acknowledge that the current TS management and staff have demonstrated and proven themselves capable of navigating the District through an unforeseeable pandemic.

Nonetheless, capabilities and qualifications of the current TS does not eliminate the need to have a comprehensive TS DRP/BCP manual, policies, procedures, and standards for the department. Having a DRP/BCP is a preventative measure to aid recovery and/or maintain operations in case of future unforeseeable catastrophe. It is possible that a future event may include the current TS management and staff members being unavailable.

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IMAGE FROM THE AUDIT GENERAL RISK AND BUSINESS CONTINGENCY PLANNING

Having individual DRP and BCP's with identifiable responsibilities, enhances the organizations efficiency and effectiveness of operation by eliminating potential tasks that could be overlooked during chaos.

This audit will refer the DRP and BCP two separate plans while noting some interconnected activities. References of DRP and BCP utilized in this report were focused whenever possible, on criteria and policies related to technology services, education, and combination thereof.

The Information System Audit and Control Association (ISACA), formal definitions of a Disaster Recovery (DR) and Business Continuity (BC) are:

“Disaster Recovery (DR) Activities and programs designed to return the enterprise to an acceptable condition. The ability to respond to an interruption in services by implementing a disaster recovery plan (DRP) to restore an enterprise's critical business functions.”⁶

“Business Continuity Plan (BCP) A plan used by an enterprise to respond to disruption of critical business processes. An organization depends on the contingency plan for restoration of critical systems.”⁷



AUDITING BCP AND DR AND ISACA REPRESENTATION

The National Institute of Standards and Technology (NIST) is the federal government's guiding document for Informatics and Information Technology (I&IT); its series document 800 addresses the required guidelines and provides a more comprehensive definition of DR and BCP. (NIST's guidelines are consistent with the requirements of the Office of Management and Budget (OMB) Circular A30).

AUDIT METHODOLOGY

Compliance with acceptable DRP/BCP were determined by comparing the requested documents from TSO applicable district polices, acceptable practices, procedures, and research DRP/BCP standards from governing organizations and agencies.

Effectiveness and efficiencies of DRP/BCP were determined by evaluating and reviewing the processes, content, and procedures to determine if the steps in the process were functional.

OBSERVATIONS

Effect: The department provide existing District policies pertinent to T\$ for the requested
DRP/BCP policies however, the provided policies do not reference DR or BC actions. During
the previously conducted consultation audit questionnaire was performed which the
department's executive management response to having a DRP/BCP policy was "A" (i)2 (n)1 (u)1 (d)1 (i)

NIST SP 800-184		GUIDE FOR CYBERSECURITY EVENT RECOVERY	
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NIST'S GUIDE FOR CYBERSECURITY EVENT RECOVERY			

ISACA's second Information System Recovery Principles states "Create a Recovery Team with Roles and Responsibilities. The team should include all the functions and roles necessary to quickly and completely restore computer operations. There should be a document that identifies the team members, their respective roles and the steps each would take in restoring operations."⁸

AZ Auditor states "The items necessary for each plan may vary by entity, but some basic DRP components include the following:

- x Identification of critical equipment, data, and resources, including site locations to store backup data and maintain redundant system resources to allow for emergency data processing.
- x Contact list of key individuals including their roles and responsibilities.
- x Procedures for regularly backing up systems and data and regularly testing backups.
- x Procedures for activating the DRP, notifying appropriate parties, and assessing the severity of the disruption and the required response.
- x Steps and procedures for restoring systems to full functionality.
- x Supporting information as necessary to ensure a comprehensive plan such as business impact analysis, vendor contract information, etc."

Effect: DRP/BCPs are meant to be a comprehensive guide on how to act, coordinate, and navigate through an incident. IS's DRP/BCP document does not include basic content such as Scope, purposes, processes, team responsibilities, and procedures to guide the department prior to, during, or after a disaster.

OBSERVATIONS

- x Protection and procedures to be performed to protect staff and infrastructure (e.g., hardware and software components).
 - x Mitigation, necessary measures to minimize or eliminate losses/damages
 - x Response, stabilizing a situation, establishing a safe environment, facilitating, and coordinating processes.
 - x Recovery, essential activities for the department's operation.
- b) No listed responsibilities, and specified roles associated with BCP
x Operational call tree, as recommended by the Auditor General

IMAGES FROM THE AZ AUDITOR GENERAL RISK AND BUSINESS

Cause:

OBSERVATIONS

members of the SDR team would be available, or that other technicians (experienced or not) would be familiar with the Distow 382 T's (w)1 (x02)24(1)68(e)file T (- ()TJ -C

CONNECTION BETWEEN BUSINESS CONTINUITY PLAN AND DISASTER RECOVERY PLAN

Cause: Combined DRP/BCP rather than independent plans with unique functions, activities, and requirements.

Recommendations:

- a. Create separate DRP and BCP processes and responsibilities

5. TSS DRP/BCP MANUAL LACKS FOUNDATIONAL CORE PRINCIPLES

Condition: The TSS DRP/BCP manual does not disclose the basic core principles and/or fundamentals followed to create the department's manual.

Criteria Best practices most written DRP and BCP guides, policies, procedures, and standards note and reference the governance authority/principles the document is based on, aligned with, or follows. This 2019/03/24 Tm (P) Tj ET Q q 0279w.r92 0oq 027(y(eJ -

OBSERVATIONS

Responses to audit findings are an acknowledgment from management of the necessary corrections and a commitment to improve where they are necessary to perform required quality assurance of corrective actions

NOTE Recommendations for the findings in the external test report were in a confidential report; therefore, to preserve the confidentiality of the document, they will not be disclosed in this public report.

CAUSE

8. RESTRICTIONS AND DELAYED ACCESS TO INFORMATION

CONDITIONS created delays on requested preliminary documents, requested extensions, re schedules, and requested audit limitations.

CRITERIA USDPolicyCodeDIFA-Office of Internal Audit (OIA) Unrestricted Access: "The OIA shall be provided unrestricted access to all functions, records (including data and databases), property, and personnel relevant to the subject being reviewed. The OIA shall be free of interference in determining the scope of internal audits, performing audit work, and communicating audit results. Any auditee impositions, limitations, objections, and or issues, that could potentially impair or jeopardize the internal audit independence or the timely completion of an audit, shall be reported to the Superintendent (y)2 (4 (thh0d2 (a3[.91 -1.22

reveal any threats and vulnerabilities and a planning component to develop strategies for minimizing risk. The result is a business impact analysis report, which describes the potential risks specific to the organization studied. One of the basic assumptions behind a BIA is that every component of the organization relies on the continued functioning of all the others. However, some are more crucial than others and require a greater allocation of funds and operational resources in the event of a disaster.³⁸

Global Technology Audit Guide (GTA) Business Continuity Management 53- Business Impact Analysis: "A BIA is used to identify critical business processes that need to be recovered following a disaster event...."

A.- Identifying the Business Processes: The first step in a BIA is to identify the business processes performed by the functional team, the resources needed to perform the function, and the critical staff performing the work. The business processes should not be broken down into too many individual processes. Business processes should be identified separately if they have different staffing (e.g., staff roles), service providers (e.g., third party, outsourcer, etc.), or resources (e.g., staff).

B.-Determining RTO and RPO Based on Business Impact: The second step in a BIA is to identify the type of business impact if the business process cannot be performed...Then, determine a recovery time objective (RTO) based on the types of business impact...Typically, the cost of the recovery solution will rise as the RTO decreases (i.e., if the business process must be restored immediately, the cost could be very high)...Next, determine a recovery point objective (RPO) for information systems. The RPO is the amount of data that can be lost if a disaster destroys the information system. Recovery Point Objective (RPO) is the amount a data that can be lost if a disaster destroys the information system...³⁹

GTA's image below illustrates an example of a Recovery Time Objective (RTO) and Recovery Point Objective (RPO).

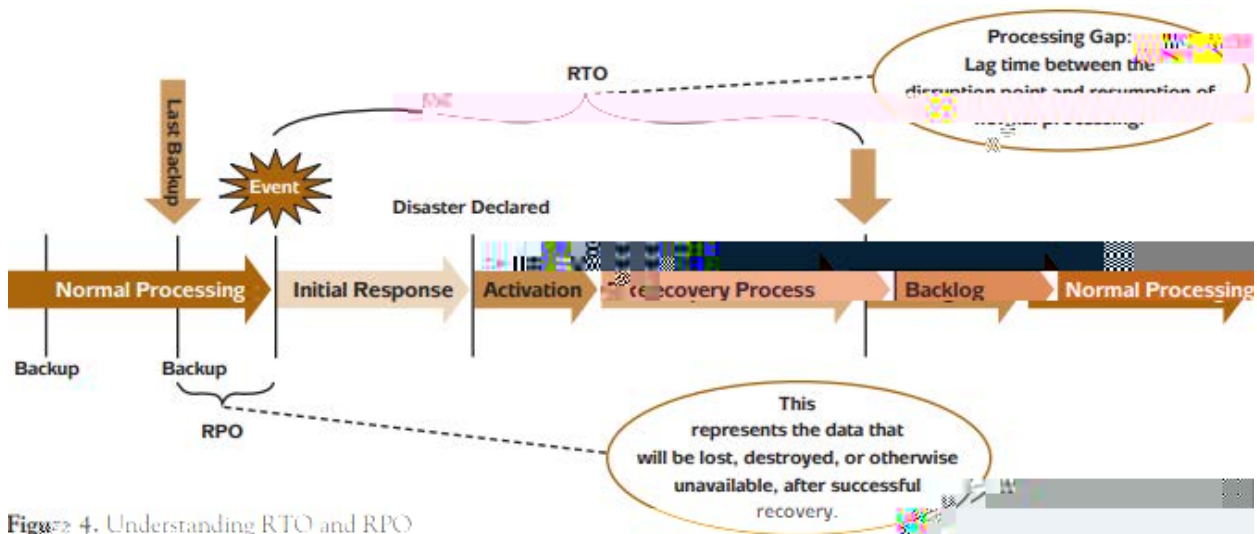


Figure 4. Understanding RTO and RPO

IMAGERETRIEVEDFROMGTAG10:BUSINESSCONTINUITYMANAGEMENT

Ready, states that "A BIA report should document the potential impacts resulting from disruption of business functions and processes. Scenarios resulting in significant business

interruption should be assessed in terms of financial impact, if possible. These costs should be compared with the costs for possible recovery strategies.

The BIA report should prioritize the order of events for restoration of the business. Business processes with the greatest operational and financial impacts should be restored first.


EFFECT A BIA should identify key elements, essential processes, basic functions, and necessary resources for the business continuity plan at various levels of the organization.

The BIA document titled “Business Impact Analysis and Infrastructure Update Plan (BIA/IUP)” was provided in place of the requested BIA report. The document was dated “December 2021”, the credited team was “TS Infrastructure and Architecture Teams”; it addressed “Upgrade Plan/Cloud Migration”.

The document was segmented into four categories, structured in an outline format; it contained minimal information with no analysis of the impact operational or financial to the list of items, no measured timing, or duration of disruption. Example page below.

Selected one out of the four items in the provided document by TS, titled “Business Impact Analysis and Infrastructure Upgrade Plan”

4. Recovery Systems and Resources



In order to preserve data and maintain continual business operations, it was determined to proceed with cloud migration to the Microsoft Azure platform for certain essential systems in Spring and Summer 2022.

Subsequent migration may follow based on need, quality assurance, testing and performance in the cloud of the systems listed below.

The list of systems included in the cloud migration in Spring & Summer 2022:

- 1) Active Directory (AD) and Azure Active Directory (AAD)
- 2) Library Management System (Jesuit Web)
- 3) Printing management and Audit System (Universal Printing System)
- 4) Some Business Intelligence Systems (BI)
- 5) [Redacted]
- 6) Some Data Backup [Redacted]
- 7) Student Information System (SIS - Synergy)
- 8) Transportation System (Versatran)
- 9) TS Work Order Ticketing System (Trackit)

Technology Services

“BUSINESS IMPACT ANALYSIS AND INFRASTRUCTURE UPGRADE PLAN” by TS⁴²

OBSERVATIONS

BIA reports are impact assessments that assist management in developing business continuity plans with identified activities to be prioritized, detected timing and duration of disruption, allocation of resources, and mitigation of risk.

TechTarget notes that "One of the basic assumptions behind a BIA is that every component of the organization relies on the continued functioning of all the others. However, some are more crucial than others and require a greater allocation of funds and operational resources in the event of a disaster"⁴³

Example: (Image below)

ELEMENTS OF BUSINESS IMPACT ANALYSIS (BIA), by TechTarget⁴⁴

CAUSE Not implementing the intended purpose and basic structure of a BIA report

RECOMMENDATIONS

- a. Identify and summarize anticipated impacts on the department's operations, such as
 - f Timing– The period in which an incident would have the most impact,
Beg

- f* Financial Impact Additional cost due to damages resulting from the occurrence, such as, repairs or replacement of assets, data losses and recovery, etc.).
- b. Provided references for images used in the documents.

10.

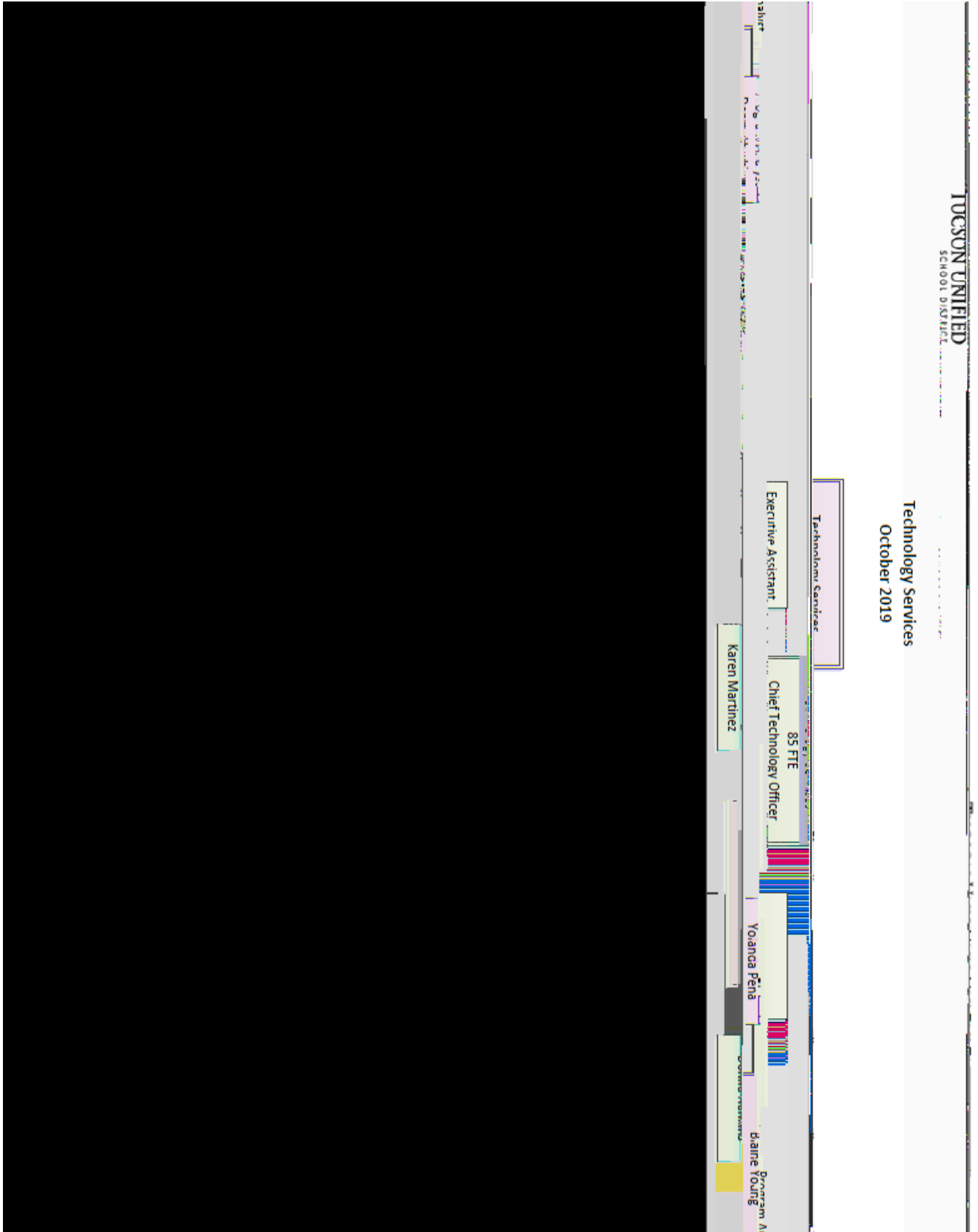
Criteria: Best practices,

The screenshot shows a software interface with a 'Summary' tab. Below the tab is a table with several columns. The first column contains a small icon. The second column shows '25.87Gb'. The third column shows '81.86Gb'. The fourth column shows '0'. The fifth column shows '0'. The sixth column shows '0'. The seventh column contains the text 'Completed with errors.' and a yellow 'Failed' label.

	25.87Gb	81.86Gb	0	0	0	Completed with errors.
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CONCLUSION

FIGURE 1



font. Clarification questions are in RED font. Management's 1st set of answers are highlighted in GRAY. 2nd Clarification questions from auditor are in GREEN font. Management 3rd set of answers are highlighted in green.

15. **The Arizona State Emergency Response and Recovery Plan (SERRP)** hazards plan addressing Arizona's hazard and threat environment, including natural, technological, and human

APPENDIX B

- xProcedures for regularly backing up systems and data, and regularly testing backups.
- xProcedures for activating the DRP, notifying appropriate parties, and assessing the severity of the disruption and the required response.
- xSteps and procedures for restoring systems to full functionality.
- xSupporting information as necessary to ensure a comprehensive report as business impact analysis, vendor contract information, etc.” <http://www.azauditor.gov/reports>

credible events that could disrupt the business. Typically, BIA meetings are performed

42. **TS's Image** – “Business Impact Analysis and Infrastructure Upgrade Plan”. Page 3
Team Folder
43. **Tech Target** – “One of the basic assumptions behind a BIA is that every component of the organization relies on the continued functioning of all the others. However, some are more crucial than others and require a greater allocation of funds and operational resources in the event of a disaster”. By Paul Kirvan and Carol Sliwa. Tech Target: 2000-2022
<https://www.techtarget.com/searchstorage/definition/businessimpactanalysis>
44. **Tech Target** – Image Elements of Business (f a)2a8(me)3 (n)w. 9.96 72 54C6O (h)1 (.Tc -0.003 Tw 2

International Electrotechnical Commission (IEC)– Founded in 1906, the IEC is the world’s leading organization for the preparation and publication of international standards for all electrical electronic, electronica and related technologies. These are known collectively as “electrotechnology” <https://www.iec.ch/who-we-are>

General Accepted Auditing Standards (GAAS) sets of standards against which the quality of audits are performed and may be judged. Several organizations have developed such sets of principles, which vary by territory.

simplest, internal audit involves identifying the risks that could keep an organization from achieving its goals, making sure the organization's leaders know about these risks, and proactively recommending improvements to help reduce the risks." Additionally, "Internal auditors are explorers, analysts, problem solvers, reporters, and trusted advisors. They bring objectivity and a variety of skills and expertise to the organization." <https://global.theiia.org/about/about-internal-auditing/pages/about-internal-auditing.aspx>

Internal Control "A plan of organization under which employees' duties are arranged, and records and procedures are designed, to make it possible to exercise effective control over processes. Internal control procedures which call for proper authorizations by designated officials for all actions performed that must be specified and followed." <https://global.theiia.org>



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; (YDOXDWLRQ DQG)DLORYHU 6WDWXV & KHFN

\$)DLORYHU 5HSRUW
 8SRQ FRPSOHWLQJ WKH IDLORYHU SURFHGXUH WKH WH
 LQFOXJWKH DFKLHVFRHIVPHQWRQ 532 DQG 572 IRU
 DSSOLFDFWLRQV WR WKH 76 OHDG DQG FRRUGLQDWRU
 VWDWXV UHSRUW DQG SURYLGH D VXPPDU\ WR FRUSR
 LQFOXGH



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% 0HDVXULQJ 572 DQG 532

572 LV WKH PHDVXUHPHQW RI WKH WLPH **QHQBHQ UWWKE**

HQG XVHUV WR XVH DQG EXVLQHVV WR IXQFWLRQ, I DS

DGPLQLVWUDWRUV EURXJKW LW EDFN RQOLQH WKHQ W



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VHH LQR @XFWSLRQ V\ VWHPV 6RPH IXQFWLRQDOLW\ PD\ Q
DQG 7LHU DSSOLFDWLRQV 7KHUHIRUH LW LV LPSRU

;;,

'5 % & 3HULRGLF 7HVWLQJ
'5 % & IDLORYHU DQG UHODWHG WDKQXV DDUHDSHG DRU R
EDVHG RQ HYHQWWW ZDEOH QGDU IRU 6FKRRO ZHHWV DUH
FRRUGLQDWHG E\ WKH DSSURSULDWH 76 WHDPV 7HVW
SUHSDUHG EHIRUH WKH WHVW WDNHV SODFH \$ SODQQL

• Sa O2 Faop GDak PIR H S1 p4 p5 Uä à !à SUA.. Ü Ö Ì Ñ - UA PG D1 p10 1 Ç R R6 @UA RCF HT\$ Ia • Wâp • R



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\$33(1',; %

\$XGLW ,QIRUPDWLRQ 6KHHV

'DW+KO\

\$XGLW 6KSH WR -XQH

,QLWLDO 'RFXPHQWV 5HTXHVVHG

&\ RI 7 p RI @ @



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\$33(1',; &

%XVLQHVV ,PSDFW \$QDO\VLV DQG ,QIUD

'DWHFHPEHU

7HDF6 ,QIUDVWUXFWXUH DQG \$UFKLWHFWXUH 7HDPV

8SJUDGH &ORDXG 0LJUDWLRQ

2YHUYLHZ DQG 6FRSH

7KH VFRSH IRFXVHV RQ WKH GHFDLWLRQ @LSUDFSDRQIRU W
UFRPPHQGDWLRQV E\ WKH 7HFKQRORJ\ 6HUYLFHV 'HSD
V\ VWHPV LQDQG 6<

ð ... u€



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\$ 33 (1 ' , ; ')

6WDQGDUG 2SHUDWLQJ 3URFHGXUHV IRU 'LVDVWHU

'DWXO\

6WDQGDUG 2SHUDWLQJ 3URFHGXUHV IRU 'LVDVWHU 5HFRYHU

7KH 7HFKQRORJ\ 6HUFLFHV 66D 'HSDUWPHQW & D UFGIRSWHU
'LVDVWHU 5HFRYHU\ '5 DQG %XVLQHVV & RQLQLXW\ %&

7KH OLVW LV UHYLHZHG DQG XSGDWHG UHJXODUO\ E\ NH\ C
'LVWULFW WHDP ZKHQ UHOHYDQW & RQLQLXW DRQ FXUWLFQW
UHTXLHG V\ VWHPV XSJUDGHV IRU H[DPSOH & 29, 'HYHQWV
RWKHU

7KH SURFHGXUHV DUH EDVHG RQ WKH LQIRUPDWLRQ DQG S
3ODQ '53 DQG %XVLQHVV & RQLQLXW DQG DGRSWHG E
6HUFLFHV 'HSDUWPHQW

7KH OLVW RI VWDQGDUG RSHUDWLQJ SURFHGXUHV IRU '5

3ULPDU\ 'RFXPHQW %&3 LV WKH SULPDU\ GRFXPHQW D
76 LQFOXGLQJ SURFHVH & RQLQLXW FRQWDFW
UHOHYDQW LQIRUPDWLRQ FRQWDLQH G LQ WKH '53 %&

8SGDWH(V'53 DQG %&3 GRFXPHQW XDVOS GDVGHZKEHQ UHTX
RQ QHHG HYHQWV FKDQJHV RU XSJUDGHV

0HHWLQJ \$5HSDUWPHQW %& WRSLFXV D H S UHJXODUO\ DQG DV Q
GHSDUWPHQW PHHWLQJV 3ODQV RU FKDQJHV WR SURF
RI WKH UHJXODU PHHWLQJ EXW DUH



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\$ 3 3 (1 ' , ;)

\$SSHQGL[) FRQWDLQV D JURXS RI FRQILGHQWLDO GRFXPHQ

7KH GRFXPHQWV ZHUH SURYLGHG IRU WKLV DXGLW XSRQ UH

)RU VHBXDVWV GRFXPHQWV IRU DSDUHQDISHQVHG HQFU\SWHG
IRUPDWPIRWHG OMLPH

7KH WLWOHV RI WKH GRFXPHQWV IRU SXUSRVHV RI WKLV D

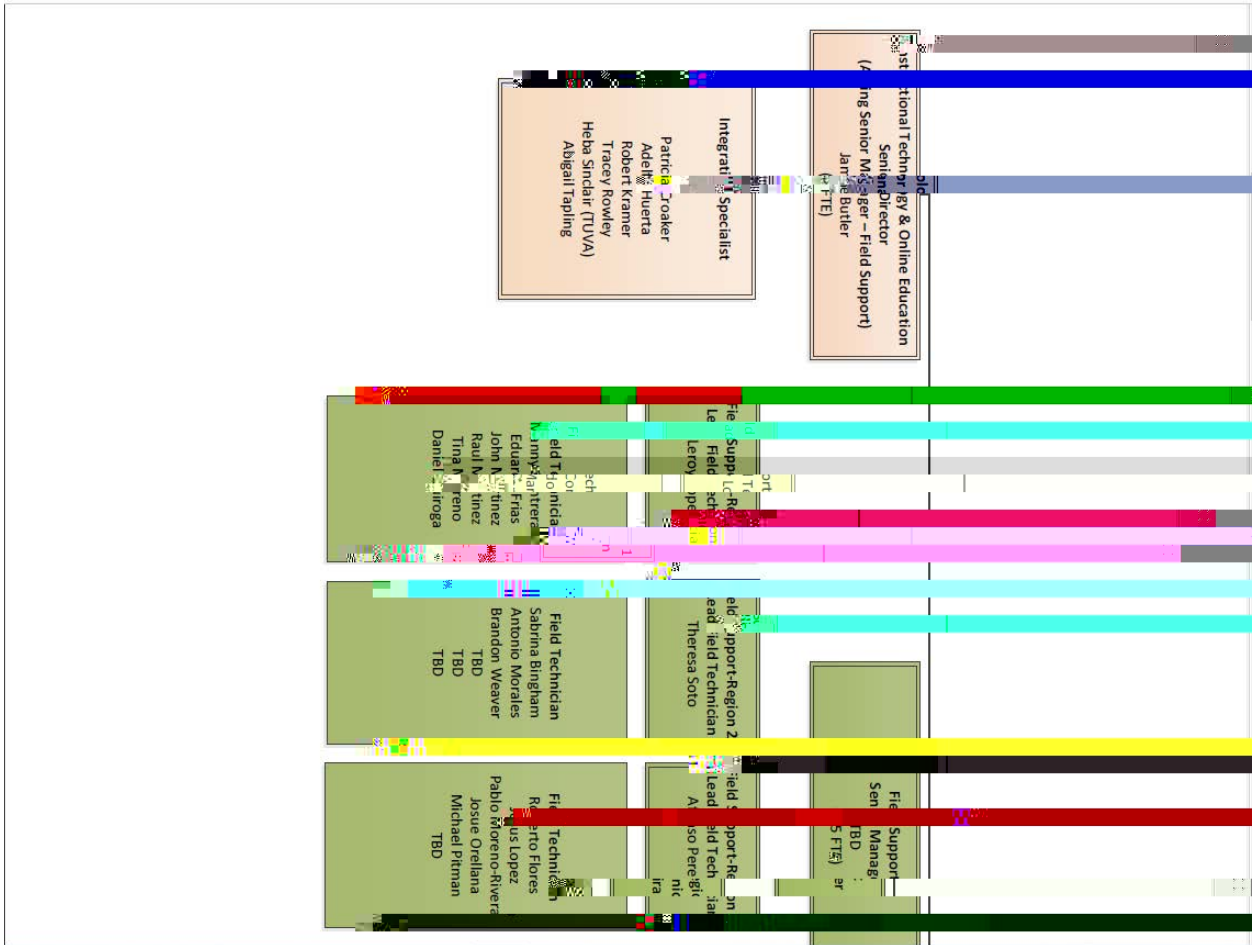
\$XGLW 7.6% & %DFNXSKRVLF òt` Aê •"\$21À aÕòte' WKLVAêDe' WKLVVHV RI



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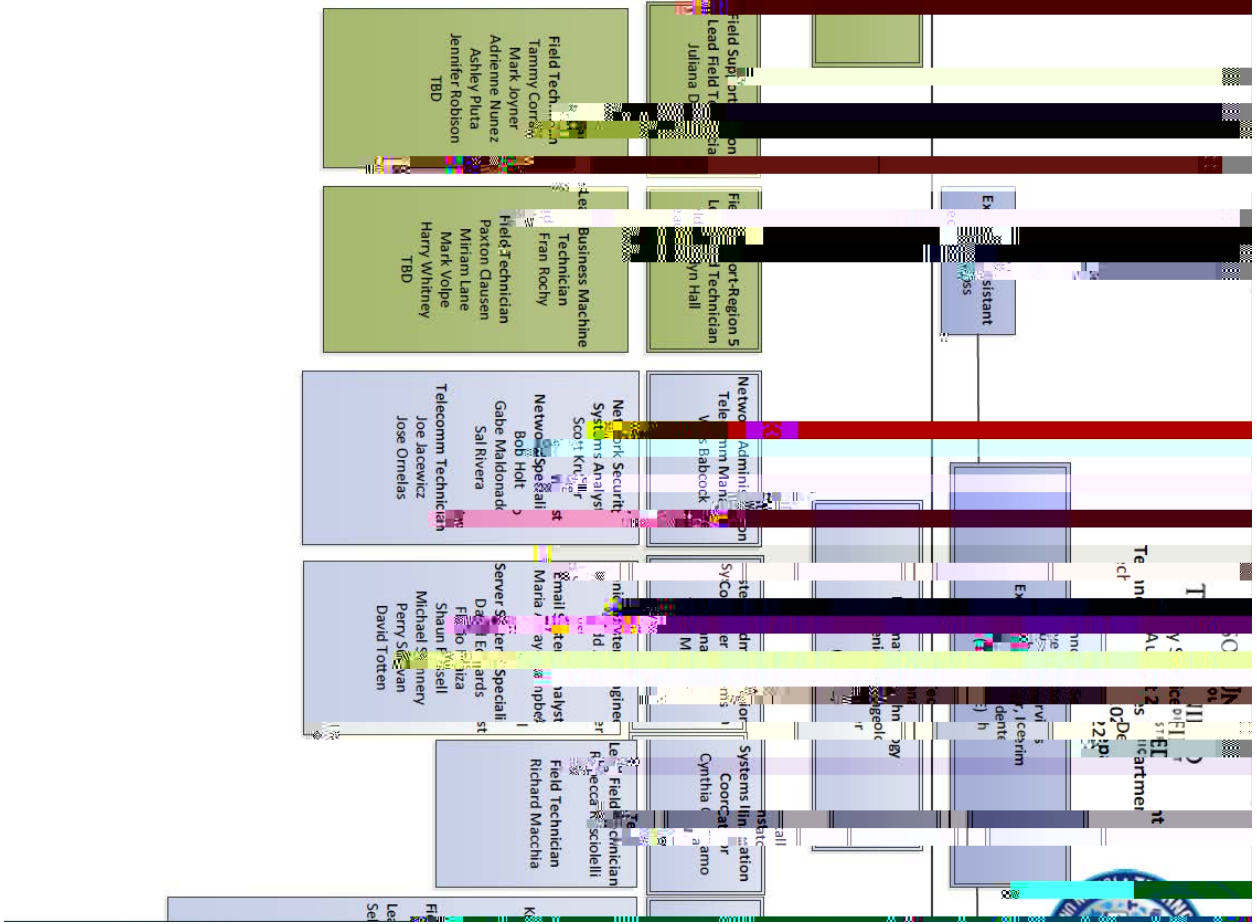
\$33(1', ; ,

7HFKQRORJ\ 6HUylFHV 2#SXDQLJ\ DWL R QI



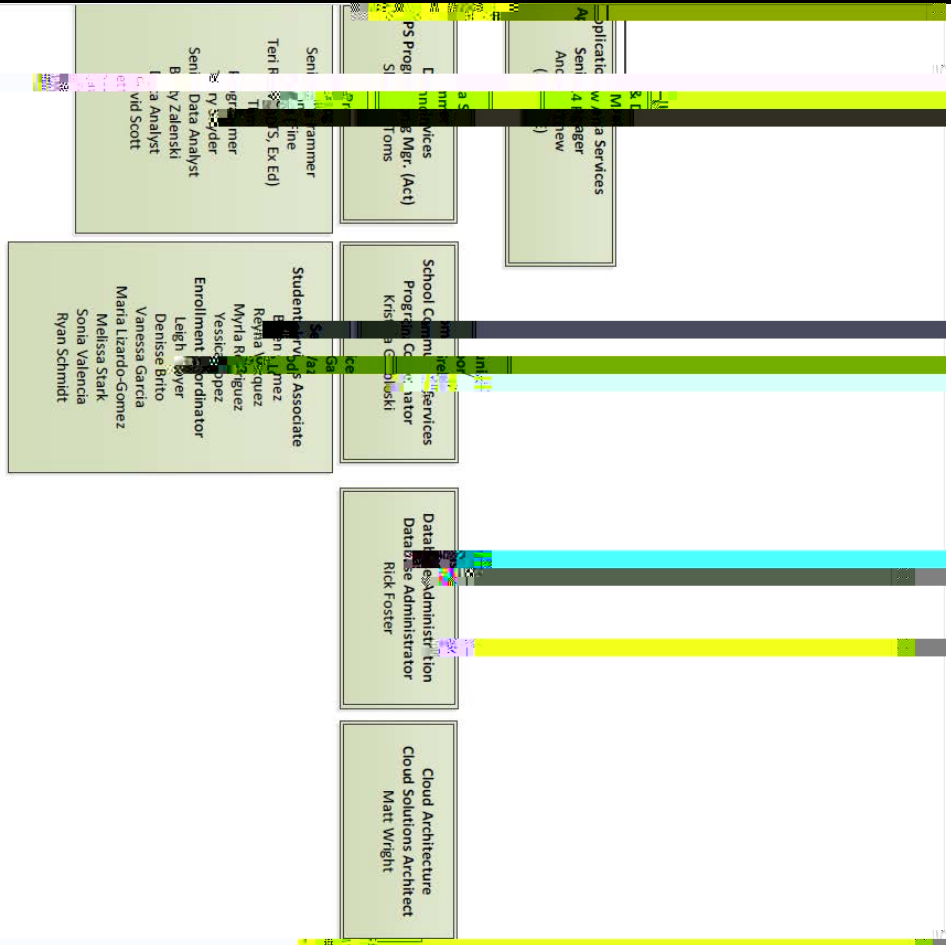


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DQG QHHGV WR EH \$ 31R QIRUPDWLRQ 7HFKQRORJ\ %XVLQ VFRSH RI WKH DXGLW SHU WKH \$XGLW /HWWHU RI ,QWH 3ODQ %&3 3OHDVH UHIHU WR UHVSQRVH DERYH

,W LV LPSRUWDQW WR UHFRJQLJH WKDW WKH 'LVWULFW DQG LQVWUXFWLRQDO GHOLYHU\ LQ D EXVLQHV FRQW 0DUFK LQGXWKH & 29D QGHPLF ,QVWUXFWLRQDO GHOLY RFFXU UHPRWHO\ IRU D ODUJH SRUWLRQ RI WKH VWXGH 7KHVH DFFRPSOLVKPHQWV FOHDUO\ GHPRQVUDWH WK GHSDUWPHFKQRORJ\ DQG PSXVHV FDQ DQG KDYH DFKLHYHG V H[HFXWLRQ :H GR DFNQRZOHGJH WKDW WKH 'LVWULFW GRFXPHQWV IRU %XVLQHV & RQWLQXLW\ 3ODQQQJ

2YHUYDWHZKRGRORJ\ SDJH \$JUHHGKX\$ 31R QIRUPDWLRQ 7HFKQRORJ\ LQ SHUVRQ PHHWLQJV QR VLWH YLVLWDWV \$ 31R QIRUPDWLRQ 7HFKQRORJ\ «

2EVHUYDWLQIRUPSOHWH ,QIRUPDWLRQ 7HFKQRORJ\ 'LVDVWHU 5HFYHU WKH GLVWULFW V\ VWHPV '53 LV DQ LPSRUW RXU 76 WHDP UHJXODUO\ UHVSQRGV VXFFHVVIXOO\ WR DQG SURIHVLRQDO EDVLV QK,LV RW R B QLLJ DGHVLRQDWLQV UHVSQRG WR RXWDJHV RI DOO VLJHV WKDW LPSDFW WK

2EVHUYDWLQIRUPSOHWH ,QIRUPDWLRQ 7HFKQRORJ\ 'LVDVWHU \$ '53 FDQ KDYH PDQ\ IRUPDWLQV QK,LV RW R B QLLJ DGHVLRQDWLQV UHVSQRG WR RXWDJHV RI DOO VLJHV WKDW LPSDFW WK

2EVHUYDWLQIRUPSOHWH ,QIRUPDWLRQ 7HFKQRORJ\ 'LVDVWHU LQIRUPDWLRQ WKDW WKH\ GHHP QHFHVVDUJRU 76DQ HJRWH QHHGHG LQ WKH HYHQW RI D GLVDVWHU RU IRU JHQHUD WKURXJK D WLHUHG SURFHVV WKDW LGHQWLILHV WKH F DQG VXSSRUW OHYHO DJUHHPHQWV ZILW W LYH DQG R D W XWH V\ VWHPV

2EVHUYDWLRQ 31R ,QIRUPDWLRQ 7HFKQRORJ\ %XVLQ VFRSH RI WKH DXGLW SHU WKH \$XGLW /HWWHU RI ,QWH 3ODQ %&3 3OHDVH UHIHU WR UHVSQRVH DERYH

2EVHUYDWLQIRUPSOHWH ,QIRUPDWLRQ 7HFKQRORJ\ 'LVDVWHU 5HFYHU WKH GLVWULFW V\ VWHPV '53 LV DQ LPSRUW RXU 76 WHDP UHJXODUO\ UHVSQRGV VXFFHVVIXOO\ WR DQG SURIHVLRQDO EDVLV QK,LV RW R B QLLJ DGHVLRQDWLQV UHVSQRG WR RXWDJHV RI DOO VLJHV WKDW LPSDFW WK

