

County of San Bernardino

**Auditor-Controller/Treasurer/Tax Collector
Internal Audits Section**

Clerk of the Board:

Personally Identifiable Information

Follow-Up Audit



Oscar Valdez

Auditor-Controller/Treasurer/Tax Collector

268 West Hospitality Lane
San Bernardino, CA 92415-0018
(909) 382-7000

Website: www.sbcounty.gov/atc

Fraud, Waste & Abuse Hotline: (800) 547-9540

Auditor-Controller/Treasurer/Tax Collector

Mission Statement

The San Bernardino County Auditor-Controller's Office is committed to serving our customers by processing, safeguarding, and providing information regarding the finances and public records of the County. We perform these functions with integrity, independent judgment, and outstanding service. We are accurate, timely, courteous, innovative, and efficient because of our well-trained and accountable staff.

Audit Team

Denise Mejico
Chief Deputy Auditor

Menaka Burkitt
Internal Audits Manager

Carmel Manela
Supervising Internal Auditor III

Raul Marquez, CPA
Internal Auditor III

Melissa Perez
Accountant II



**Clerk of the Board:
Personally Identifiable Information Follow-up Audit**

Audit Report Letter	1
Scope, Objective and Methodology	3
Prior Audit Finding, Recommendations and Current Status	4

AUDITOR-CONTROLLER/ TREASURER/TAX COLLECTOR



- 268 West Hospitality Lane, Fourth Floor
San Bernardino, CA 92415-0018 • (909) 387-8322 • Fax (909) 890-4045
- 268 West Hospitality Lane, First Floor
San Bernardino, CA 92415-0360 • (909) 387-8308 • Fax (909) 890-5797

Matt Brown
Assistant Auditor-Controller/Treasurer/Tax Collector

John Johnson
Assistant Auditor-Controller/Treasurer/Tax Collector

October 24, 2018

Laura Welch, Clerk of the Board

Clerk of the Board
385 N. Arrowhead Avenue, 2nd Floor
San Bernardino, CA 92415-0130

SUBJECT: PERSONALLY IDENTIFIABLE INFORMATION FOLLOW-UP AUDIT

In compliance with Article V, Section 6, of the San Bernardino County Charter and County Policy 05-20 entitled Internal Operational Auditing, we have completed a follow-up audit of the Clerk of the Board's Personally Identifiable Information. The objective of the audit was to determine if the recommendation for the finding in the Clerk of the Board's Personally Identifiable Information Audit dated December 15, 2017 was implemented. We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing established by the Institute of Internal Auditors.

We have provided a status of the audit finding identified in the original audit report issued on December 15, 2017. The Department has implemented the recommendation from the original audit report.

We would like to express our appreciation to the personnel at Clerk of the Board who assisted and cooperated with us during this engagement.

Respectfully submitted,

Oscar Valdez

Auditor-Controller/Treasurer/Tax Collector
San Bernardino County

By:

Denise Mejico

Chief Deputy Auditor

Distribution of Audit Report:

Robert Lovingood, Chair, 1st District Supervisor
Janice Rutherford, 2nd District Supervisor
James Ramos, 3rd District Supervisor
Curt Hagman, Vice Chair, 4th District Supervisor
Josie Gonzales, 5th District Supervisor
Gary McBride, Chief Executive Officer
Grand Jury
Auditor-Controller Audit Committee

Date Report Distributed: 10/29/18

OV:DLM:RM:oac



Scope and Objective

Our audit examined the Department's policies as of September 18, 2018.

The objective of this follow-up audit was to determine whether the Department implemented the recommendation contained in the prior audit report, *Personally Identifiable Information Audit*, issued on December 15, 2017.

Methodology

In achieving the audit objective, the following audit procedures were performed, including but not limited to:

- Interviews of Clerk of the Board personnel.
- Review of the Department's policies and procedures.



Prior Finding: The Department lacks written policies and procedures as required by County Policy Manual, Section 14.

San Bernardino County Policy no. 14-02 requires all departments and divisions to establish and implement policies and procedures for protecting the integrity, security and confidentiality of nonpublic personally identifiable information (PII) received, collected, stored and transmitted within its respective department or division. Also, San Bernardino County Standard Practice no. 14-02SP1 requires all County departments to create and make available to all staff an information breach policy that identifies departmental responses to a breach relative to their legal requirements, nature of business, size and sensitivity of information maintained.

It was noted that:

- The Department lacks written policies and procedures for protecting the integrity, security and confidentiality of personally identifiable information.
- The Department lacks a written information breach policy.

The Department has implemented a number of business practices addressing the protection of PII, including but not limited to, redaction processes, physical and electronic safeguarding of PII, and secure handling and disposal of confidential information. The Department was aware of the County PII Policy, but was unaware that the Policy requires each Department to create internal written policies and procedures addressing the protection of PII and the handling of information breaches. Without established written policies and procedures, nonpublic personally identifiable information is placed at risk of loss or fraudulent use. Also, the likelihood of potential harm to the County as a result of an information breach, including adverse legal action, is increased.

Recommendation:

We recommend that the Department establish and implement written policies and procedures for protecting the integrity, security and confidentiality of nonpublic personally identifiable information received, collected, stored and transmitted by the Department. We also recommend that the Department establish and implement an information breach policy to include, at minimum, the legal requirements set forth in San Bernardino County Standard Practice no. 14-02SP1.

Prior Audit Finding, Recommendations and Current Status



Current Status: Implemented

The Department has established and implemented written policies for protecting the integrity, security and confidentiality of personally identifiable information. The Department also established and implemented written policies on the information breach policy to include, at minimum, the legal requirements set forth in San Bernardino County Standard Practice no. 14-02SP1.