

County of San Bernardino

Auditor-Controller/Treasurer/Tax Collector
Internal Audits Section

County Museum: Personally Identifiable Information Follow-Up Audit



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Auditor-Controller/Treasurer/Tax Collector

Mission Statement

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October 24, 2018

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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 County Museum's Personally Identifiable Information. The objective of the audit was to determine if the recommendation for the finding in the County Museum'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 County Museum 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

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Date Report Distributed: 10/29/18

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Scope and Objective

Our audit examined the Department's policies as of October 9, 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 County Museum 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 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 policies and procedures for protecting the integrity, security and confidentiality of personally identifiable information.
- The Department lacks an information breach policy.

The Department was unaware of the County Policy requiring such policies and procedures. Without established 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 County Museum. 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.



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.