

County of San Bernardino

Auditor-Controller/Treasurer/Tax Collector
Internal Audits Section

County Museum: Personally Identifiable Information Audit



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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.

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December 15, 2017

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SUBJECT: PERSONALLY IDENTIFIABLE INFORMATION 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 an audit of the County Museum's Personally Identifiable Information. The primary objective of the audit was to determine if personally identifiable information received, collected, stored and transmitted by the County Museum is handled in compliance with County Policy Section 14. 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 identified a significant procedure and practice that could be improved. We have listed this area for improvement in the Audit Finding and Recommendation section of this report.

We sent a draft report to the Department on October 24, 2017 and discussed our observations with management on November 2, 2017. The Department's responses to our recommendations are included in this report.

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

Respectfully submitted,

Oscar Valdez

Auditor-Controller/Treasurer/Tax Collector
San Bernardino County

By:

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County Museum: Personally Identifiable Information Audit

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Summary of Audit Results

Our finding and recommendation is provided to assist management in achieving compliance with County Policy.

The table below summarizes the audit finding and recommendation for this audit engagement. For further discussion, refer to the *Audit Finding and Recommendation* section of this report.

Finding and Recommendation	Page No.
The Department lacks written policies and procedures as required by County Policy Manual, Section 14.	4
The Department should establish and implement written policies and procedures governing personally identifiable information and information breaches.	



Background

The San Bernardino County Museum (Museum) is an accredited regional museum in California. Through responsible collection, preservation, exhibition, and education, the County Museum provides enhanced "Quality of Life" for County and regional residents. The museum maintains and develops unique cultural and natural science collections. The Museum is comprised of the following divisions: Anthropology, Biology, Education, Geology, History and Paleontology. All divisions enhance public learning through educational services for families, the general public, school groups, educators and scholars. The Museum consist of the main facility in Redlands, Victory Valley Museum in Apple Valley and six historic sites: Agua Mansa Cemetery in Colton, Casa De Rancho Cucamonga (John Rains House) in Rancho Cucamonga, Daggett Stone Hotel in Dagget, Asistencia Outpost of the Mission San Gabriel in Redlands, Yorba Slaughter Families Adobe in Chino and Yucaipa Adobe in Yucaipa.

Due to the Redlands and Victor Valley Museums accepting and processing membership applications on behalf of the San Bernardino County Museum Association (a 501(c) (3) nonprofit organization), and documenting donor information when items are donated or loaned for display, personally identifiable information is regularly handled by the Department. Personally identifiable information is defined by County Policy no. 14-02 as any piece of information maintained by the County electronically or in paper format which can potentially be used to uniquely identify, contact, or locate County employees or members of the public. Examples are information, such as but not limited to, social security numbers, driver's license numbers and addresses.



Scope and Objective

The objective of this audit was to determine if personally identifiable information received, collected, stored and transmitted by the County Museum is handled in compliance with County Policy Section 14, as of September 28, 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 policies and procedures.
- Walk-through of activity.



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.

Management's Response:

Currently, the Museum Department has in place unwritten procedures to accept and process personally identifiable information. Upon receiving guidance about written policies being required, policies and procedures are being developed to comply with the County Policy no. 14-02.

The Department will complete a full review by April 2018 to 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. In addition, the Department will 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.

Auditor's Response:

The Department's actions and planned actions will correct the deficiencies noted in the finding.