

County of San Bernardino

Auditor-Controller/Treasurer/Tax Collector
Internal Audits Section

Registrar of Voters: Personally Identifiable Information Audit



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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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February 27, 2018

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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 Registrar of Voters' Personally Identifiable Information. The primary objective of the audit was to determine if personally identifiable information received, collected, stored and transmitted by the Registrar of Voters 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 January 25, 2018 and discussed our observations with management on February 7, 2018. The Department's response to our recommendation is included in this report.

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

Respectfully submitted,

Oscar Valdez

Auditor-Controller/Treasurer/Tax Collector
San Bernardino County

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Registrar of Voters: 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 does not have an all-encompassing written policy and procedure relating to PII and information breaches 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 Registrar of Voters (ROV) Elections Office is responsible for all aspects of the election process for San Bernardino County, which consists of 24 incorporated cities and over 65 unincorporated communities. With a population of over 2 million people, the County has more than 800,000 registered voters. The Elections Office administers all local, state, and federal elections in the County, including the management of voting systems, the employment and training of poll workers, election ballot processing and vote tallying.

The Elections Office also performs all voter registration functions, including the storage and maintenance of voter registration records. The Elections Office typically operates year-round with a small staff of around 24 employees. Before elections, that number may increase to as many as 300 temporary employees and 3,000 poll workers.

Due to the nature of the work performed by the ROV, 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 that is not subject to disclosure under the Public Records Act, Government Code Section 6250.



Scope and Objective

The objective of this audit was to determine if personally identifiable information received, collected, stored and transmitted by the Registrar of Voters is handled in compliance with County Policy Section 14, as of November 21, 2017.

Methodology

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

- Interviews of ROV personnel.
- Review of policies and procedures.
- Walk-through of activity.



Finding: The Department does not have an all-encompassing written policy and procedure relating to PII and information breaches as required by County Policy Manual, Section 14.

San Bernardino County Policy no. 14-02 requires that 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.

The following conditions were identified:

- Although the Department has procedures addressing how sensitive forms should be handled for certain sections like the Voter Records Department and the Election Workers Department, the Department does not have an all-encompassing written policy and procedure for protecting the integrity, security and confidentiality of PII.
- The Department does not have a written information breach policy.

The Department does handle and safeguard PII, but does not have an overall encompassing PII policy for the department. Without established PII policies and procedures, PII is placed at risk of loss or fraudulent use. The likelihood of potential harm to the County as a result of an information breach, including adverse legal action, is also increased.

Recommendation:

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

Management's Response:

The Department agrees with the Auditor's findings regarding the absence of an all-encompassing written policy and procedure relating to PII and information breaches as required by County Policy Manual, Section 14. The Elections Office



is working with the County Administrative Office to establish and implement written policies and procedures governing PII and information breaches.

Auditor's Response:

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