

# County of San Bernardino

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

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## **Registrar of Voters: Personally Identifiable Information Follow-Up Audit**



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# Auditor-Controller/Treasurer/Tax Collector

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## *Mission Statement*

*This 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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## **Audit Team**

**Denise Mejico**  
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Internal Audits Manager

**Carmel Manela, CIA**  
Supervising Internal Auditor III

**Melissa Perez**  
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# **Registrar of Voters**

## **Personally Identifiable Information Follow-Up Audit**

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**Auditor–Controller/Treasurer/Tax Collector**

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**November 19, 2019**

**Bob Page, Director**  
Registrar of Voters  
777 East Rialto Avenue  
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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 Registrar of Voters (Department) Personally Identifiable Information (PII). The objective of the audit was to determine if the recommendations for the finding in the Registrar of Voters PII Audit issued February 28, 2018 were 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 February 28, 2018. The Department has partially implemented the recommendation from the original audit report.

We sent a draft report to the Department on September 25, 2019 and discussed our observations with management on October 7, 2019. The Department’s responses to the current status of our recommendations are 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,

**Ensen Mason CPA, CFA**

Auditor-Controller/Treasurer/Tax Collector  
San Bernardino County

By: \_\_\_\_\_

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Chief Deputy Auditor

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## Scope and Objective

Our audit examined the Registrar of Voters (Department) policies as of July 11, 2019.

The objective of this follow-up audit was to determine whether the Department implemented the recommendations contained in the prior audit report, *Personally Identifiable Information Audit*, issued on February 28, 2018.

## Methodology

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

- Interviews of Department staff
- Review of the Department's policies and procedures



**Prior Finding: The Department does not have an all-encompassing written policy and procedure relating to personally identifiable information (PII) and information breaches 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.

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.



### **Current Status: Partially Implemented**

The Department has drafted written policies and procedures for protecting the integrity, security and confidentiality of nonpublic PII received, collected, and stored and transmitted by the Registrar of Voters. The Department has also drafted written policies and procedures to include, at a minimum, the legal requirements set forth in San Bernardino County Standard Practice No. 14-02SP1. However, the policies and procedures had not been finalized and were awaiting final approval as of fieldwork date. Although the draft policies and procedures were distributed to staff, there was no documented record of distribution. The Department should finalize the policy and document the date and staff it was distributed to.

### **Management's Response:**

Since drafting the written procedures for protecting the integrity, security and confidentiality of nonpublic PII received, collected, and stored and transmitted by the Registrar of Voters, the Department worked with County Counsel to review and revise the written procedures. On October 7, 2019, the final written procedures were delivered to all ROV staff via email by the Registrar of Voters, and documentation of delivery was provided to the Audit Team.

### **Auditor's Response:**

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