

**SUBMITTAL TO THE BOARD OF SUPERVISORS
COUNTY OF RIVERSIDE, STATE OF CALIFORNIA**



**ITEM: 2.3
(ID # 21544)**

MEETING DATE:
Tuesday, April 18, 2023

FROM : AUDITOR CONTROLLER:

SUBJECT: AUDITOR CONTROLLER: Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender, Follow-up Audit, All Districts. [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and file Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender, Follow-up Audit

ACTION:Consent


Ben J. Benoit, COUNTY AUDITOR-CONTROLLER 4/4/2023

MINUTES OF THE BOARD OF SUPERVISORS

On motion of Supervisor Washington, seconded by Supervisor Spiegel and duly carried by unanimous vote, IT WAS ORDERED that the above matter is received and filed as recommended.

Ayes: Jeffries, Spiegel, Washington, Perez, and Gutierrez
Nays: None
Absent: None
Date: April 18, 2023
xc: Auditor-Controller

Kimberly A. Rector
Clerk of the Board

By: 
Deputy

**SUBMITTAL TO THE BOARD OF SUPERVISORS COUNTY OF RIVERSIDE,
STATE OF CALIFORNIA**

FINANCIAL DATA	Current Fiscal Year:	Next Fiscal Year:	Total Cost:	Ongoing Cost
COST	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
NET COUNTY COST	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
SOURCE OF FUNDS: N/A			Budget Adjustment: No	
			For Fiscal Year: n/a	

C.E.O. RECOMMENDATION: Approve

BACKGROUND:

Summary

We completed a follow-up audit of the Riverside County Law Offices of the Public Defender. Our audit was limited to reviewing actions taken as of November 1, 2022, to correct findings noted in our original audit report 2022-004 dated January 11, 2022. The original audit report contained three recommendations, all of which required implementation to help correct the reported findings.

Based on the results of our audit, we found that of the three recommendations:

- Two of the recommendations were implemented.
- One of the recommendations was not implemented.

For an in-depth understanding of the original audit, please refer to Internal Audit Report 2021-004 included as an attachment to this follow-up audit report or it can also be found at <https://auditorcontroller.org/divisions/internal-audit>.

Impact on Residents and Businesses

Provide an assessment of internal controls over the audited areas.

SUPPLEMENTAL:

Additional Fiscal Information

Not applicable

ATTACHMENTS:

A: Riverside County Auditor-Controller - Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender, Follow-up Audit.


 Stephanie Pava, Principal Management Analyst 4/10/2023

Internal Audit Report 2023-315

**Riverside County
Law Offices of the Public Defender
Follow-up Audit**

Report Date: April 18, 2023



**Office of Ben J. Benoit
Riverside County Auditor-Controller
4080 Lemon Street, 11th Floor
Riverside, CA 92509
(951) 955-3800**

www.auditorcontroller.org



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ACO | AUDITOR
CONTROLLER
COUNTY OF RIVERSIDE

Ben J. Benoit
Riverside County Auditor-Controller

Tanya S. Harris, DPA, CPA
Assistant Auditor-Controller

April 18, 2023

Steven L. Harmon
Public Defender
Riverside County Law Offices of the Public Defender
Riverside, CA 92501

Subject: Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender, Follow-up Audit

Dear Mr. Harmon:

We completed the follow-up audit of Riverside County Law Offices of the Public Defender. Our audit was limited to reviewing actions taken as of November 1, 2022, to help correct the findings noted in our original audit report 2022-004 dated January 11, 2022.

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. These standards require that we plan and perform the audit to obtain reasonable assurance that our objective, as described in the preceding paragraph, is achieved. Additionally, the standards require that we conduct the audit to provide sufficient, reliable, and relevant evidence to achieve the audit objectives. We believe the audit provides a reasonable basis for our conclusion.

The original audit report contained three recommendations, all of which required implementation to help correct the reported findings. Based on the results of our audit, we found that of the three recommendations:

- Two of the recommendations were implemented.
- One of the recommendations was not implemented.

**Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit**

Summary of the conditions from the original audit and the results of our review on the status of the implementation of the recommendations are provided in this report. For an in-depth understanding of the original audit, please refer to Internal Audit Report 2021-004 included as "Attachment A" of this audit report along with our department status letter as "Attachment B." You can also find the original audit report at <https://auditorcontroller.org/divisions/internal-audit>.

We completed testing to determine whether the recommendations were implemented. We concluded that one recommendation was not implemented. The results were communicated with the Public Defender management and your response to our conclusion is included this report.

We thank you and your staff for your help and cooperation. The assistance provided contributed significantly to the successful completion of this audit.



Ben J. Benoit
Riverside County Auditor-Controller



By: René Casillas, CPA, CRMA
Deputy Auditor- Controller

cc: Board of Supervisors
Jeff A. Van Wagenen, County Executive Officer
Dave Rogers, Chief Administrative Officer
Grand Jury

**Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit**

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Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit

Professional Services

Finding 1: Approval for Special Services

“Our sample of eleven (37%) out of thirty special service request forms for services exceeding \$2,500 did not have the required approval signatures. According to Public Defender policy and procedure, 501- Purchasing, *Special Service Request Procedures*, ‘Each special service form must be submitted to and approved by a supervisor and management prior to any special service usage for any case. The level of approval is as follows:

1. A Supervisor may approve items up to \$ 1,000.
2. Items \$ 1,001 - \$ 2,500 require approval of a Supervisor and an Assistant Deputy Public Defender.
3. Items \$ 2,501 and above require approval of the Supervisor and the Public Defender.’

For Public Defenders, one signature has been enough for them to move forward since they consider all their cases urgent, requiring prompt attention. Proper authorization will prevent invalid transaction and an internal record that an activity has been reviewed and approved by appropriate authority before it can process or paid. Further, it ensures compliance with its own departmental policy.”

Recommendation 1

“Ensure that in-house service request forms are approved by personnel with appropriate authority as required by departmental policy.”

Current Status 1: Implemented

**Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit**

Application Controls

Finding 2: Disabling Systems' Access Timely

“Active directory and defender’ data application accounts were not disabled in a timely manner for employees and volunteers no longer with the department. We identified the following in our review of 20 terminated employees (10) and volunteers (10):

- Twenty (100%) out of twenty sampled terminated employees and volunteers did not have ticket requests to Information Technology from the department to disable access to active directory network, and Defender’s Data application.
- Three (30%) out of ten sampled terminated employees were not disabled from the active directory network as of the time of our audit fieldwork. Further, to disable the employees accounts from our sample selected, the average time lapsed was 153 days with the longest time lapsed being 738 days and the shortest being 1 day.
- Nine (45%) out of twenty sampled terminated employees and volunteer’s access accounts were not disabled from Defender’s Data application as of the date of our audit fieldwork. The average time lapsed to disable the account from our sample selected was 404 days, with the longest time lapsed being 745 days and the shortest being 17 days.”

Recommendation 2.1

“Ensure compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*, by disabling Defender’s Data application and active directory network on the day of an employee’s termination or transferred out from the department.”

Current Status 2.1: Not Implemented

The Public Defender’s Office is not in compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*. We identified the following in our review:

- Eight (35%) out of 23 sampled terminated employees and volunteers did not have

**Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit**

their active directory account termination requests created and approved in a timely manner. The average time lapsed was 19 days with the longest time lapsed being 92 days and the shortest being 2 days.

- Eleven (48%) out of 23 sampled terminated employees and volunteer's active directory accounts remained active as of the date of our review (December 2022).
- Six (26%) out of 23 sampled terminated employees and volunteers access rights to Defender's Data application were not disabled timely. The average time lapsed was 57 days with the longest time lapsed being 97 days and the shortest being 5 days.
- Fifteen (65%) out of 23 terminated employees and volunteer's Defender's Data application accounts remained active as of the date of our review (January 2023).

Management's Response

"The Public Defender's Office has made significant strides towards complete compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*, since our initial Internal Audit, 2022-004. Upon review of the Follow Up Audit's findings, the following was discovered:

1. Additions/Terminations to the Defender Data system was managed solely by RCIT staff until June 2022. The request is submitted by our department via email (not a RCIT service ticket) to a specific person (DefenderData@rivco.org) assigned to manage the Defender Data system. There is no current tracking method to ensure RCIT processes our requests in a timely manner. After June 2022, Defender Data account termination was handled in house by Public Defender IT staff.
2. July 2022 the Public Defender employed their own IT staff. Previous procedures approved in September 2021 were revised in June 2022 in preparation of new workflows. Due to this transition time, some terminated staff inadvertently took longer to process as the Department was adjusting to new procedures and workflows.
3. Some delays were found to be due to approving emails RCIT sends out going unanswered. In some instances, a supervisor in our department would receive an email to approve the termination process and not immediately respond therefore causing delays. That process has since been revised to have all approving RCIT emails sent to the

**Internal Audit Report 2023-315: Riverside County Law Offices of the Public Defender,
Follow-up Audit**

Department's Management staff with a 24-hour maximum timeframe to approve requests.

4. The terminated employees found in the Follow-Up Audit as "active", now have been terminated from the Defender Data system.
5. The Public Defender's Office is currently working on updating all Account Management policies to tighten up all workflows associated with the termination process from County systems."

Recommendation 2.2

"Ensure that the department have an effective termination procedure including written policy and procedures in disabling access to active directory network and Defender's Data application."

Current Status 2.2: Implemented at Completion of Original Audit

Attachment A

Internal Audit Report 2022-004

**Riverside County
Law Offices of the Public Defender
Audit**

Report Date: January 11, 2022



**Office of Paul Angulo, CPA, MA
Riverside County Auditor-Controller
4080 Lemon Street, 11th Floor
Riverside, CA 92509
(951) 955-3800**

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CONTROLLER**
COUNTY OF RIVERSIDE

Paul Angulo, CPA, MA
Riverside County Auditor-Controller

Tanya S. Harris, DPA, CPA
Assistant Auditor-Controller

January 11, 2022

Steven L. Harmon
Public Defender
Riverside County Law Offices of the Public Defender
4075 Main Street, Suite 100
Riverside, CA 92501

Subject: Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender Audit

Dear Mr. Harmon:

In accordance with Board of Supervisors Resolution 83-338, we audited the Law Offices of the Public Defender to provide management and the Board of Supervisors with an independent assessment of internal controls over professional services and application controls.

We conducted our audit in accordance with the International Standards for the Professional Practice of Internal Auditing. These standards require that we plan and perform the audit to obtain sufficient, reliable, relevant and useful information to provide reasonable assurance that our objective as described above is achieved. An internal audit includes the systematic analysis of information to evaluate and improve the effectiveness of internal controls. We believe this audit provides a reasonable basis for our conclusion.

Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial and non-financial information. Management is responsible for establishing and maintaining adequate internal controls. Our responsibility is to evaluate the internal controls.

Our conclusion and details of our audit are documented in the body of this audit report.

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

As requested, in accordance with paragraph III.C of the Board of Supervisors Resolution 83-338, management responded to each reported condition and recommendation contained in our report. Management's responses are included in the report. We will follow-up to verify that management implemented the corrective actions.

Paul Angulo, CPA, MA
Riverside County Auditor-Controller



By: René Casillas, CPA, CRMA
Chief Internal Auditor

cc: Board of Supervisors
Jeff A. Van Wagenen, Jr., County Executive Officer
Grand Jury

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

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**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

Executive Summary

Overview

Riverside County Law Offices of the Public Defender (Public Defender) has continued to deliver legal representation to anyone unable to afford such services of the County. The department consist of lawyers, investigators, paralegals, social workers, and clerical staff. The department represents approximately 85% of all criminal cases filed within the County.

The Public Defender has a recommended budget of \$45.3 million for FY2021-22 and 277 positions to execute its responsibilities. *County of Riverside, Fiscal Year 2021-22 Recommended Budget, June 2021, 260.*

Audit Objective

Our objective is to provide management and the Board of Supervisors with an independent assessment about the adequacy and effectiveness of internal controls over professional services and application controls. Internal controls are processes designed to provide management reasonable assurance of achieving efficiency of operations, compliance with laws and regulations, and reliability of financial information and non-financial information. Reasonable assurance recognizes internal controls have inherent limitations, including cost, mistakes, and intentional efforts to bypass internal controls.

Audit Scope and Methodology

We conducted the audit from June 17, 2021, through August 30, 2021, for operations from July 1, 2019, through August 24, 2021. Following a risk-based approach, our scope initially included the following:

- Professional Services
- State Sponsored Programs (Public Safety Realignment Act of 2011 (AB109) funding and Penal Code 4750 claims)
- Application Controls

Through inquiry, observations, and limited examination of relevant documentation, it was determined through a risk assessment of the state sponsored programs, that the risk exposure to the Public Defender associated with these processes are considered low. We focused our audit scope to internal control over professional services and application controls.

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

Audit Highlights

Summary of Existing Conditions

- A special service request form for professional services does not have the approval of the appropriate department officials for items \$ 2,501 and above as required in the department's purchasing policy. Proper authorization provides an internal record that an activity has been observed, reviewed, and approved by appropriate authority before it can be processed or paid.
- Access to the Defender's Data application and active directory network were not disabled after employees and volunteers were terminated. Disabling system user accounts is an internal control designed to prevent former employees from having access to system information.

Summary of Improvement Opportunities

- Ensure that in-house service request forms are processed for payment or approval by appropriate authority as required on professional special service request form.
- Ensure compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*, by disabling Defender's Data application and active directory network on the employees' last day of work with the department.
- Ensure the department has an effective termination procedure including written policy and procedures in disabling access to active directory network and Defender's Data application.

Audit Conclusion

Based upon the results of our audit, we identified opportunities for improvement of internal controls relating to professional services and user access right.

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

Professional Services

Background

A special service request form must be filled prior to any retention of professional services prior to utilizing the service and submitted for approval to a supervisor and manager. Each special service request form must be filled out completely and where applicable, must contain the projected number of hours needed by experts to perform the needed services along with the hourly rate. It is necessary to compare costs of services that are needed while maintaining the quality of service available.

Professional services are a key expenditure for Public Defender. The department utilizes only licensed professionals and services that are qualified and necessary.

Objective

To verify the existence and adequacy of internal control over department professional services expenditures.

Audit Methodology

To accomplish these objectives, we:

- Obtained and documented all relevant policies and procedures over department purchasing process.
- Interviewed key personnel to identify and assess their purchasing process.
- Selected samples to determine whether a special service request form was submitted, completed, and approved by appropriate level of management.

Finding 1: Approval for Special Services

Our sample of eleven (37%) out of thirty special service request forms for services exceeding \$2,500 did not have the required approval signatures. According to Public Defender policy and procedure, 501- Purchasing, *Special Service Request Procedures*, "Each special service form must be submitted to and approved by a supervisor and management prior to any special service usage for any case. The level of approval is as follows:

Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender Audit

1. A Supervisor may approve items up to \$ 1,000.
2. Items \$ 1,001 - \$ 2,500 require approval of a Supervisor and an Assistant Deputy Public Defender.
3. Items \$ 2,501 and above require approval of the Supervisor and the Public Defender.

For Public Defenders, one signature has been enough for them to move forward since they consider all their cases urgent, requiring prompt attention. Proper authorization will prevent invalid transaction and an internal record that an activity has been reviewed and approved by appropriate authority before it can process or paid. Further, it ensures compliance with its own departmental policy.

Recommendation 1

Ensure that in-house service request forms are approved by personnel with appropriate authority as required by departmental policy.

Management's Response

"Concur. Our previous policy of requiring approval of a Supervisor and an Assistant Public Defender for items from \$1,001 to \$2,500 and requiring approval of a Supervisor and the Public Defender for items over \$2,500 is unnecessary since in all these cases the amounts over the limits of the Supervisors. We have now revised our policy to state that for amounts over the limits of the Supervisors, only the Assistant Public Defender or Public Defender need approve amounts up to \$2,500 and the Public Defender or his/her designee need approve amounts over \$2,500. The revised LOPD 501-Purchasing policy has now been enacted. Please see revised policy attached."

Actual/estimated Date of Corrective Action: **September 9, 2021**

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

Application Controls

Background

Public Defender uses a case management software application called Defender's Data application for all its cases. The application is a full featured case management system designed to handle high volume caseloads as commonly found in public defender offices across the country.

When either a new hire or volunteer joins Public Defender, a ticket is prepared to Riverside County Information Technology to add these individuals to the active directory network. Once completed, a separate request is sent to the Public Defender assigned staff to provide the new employee access to the defender's data application and a registry key. When an individual leaves the organization, their active directory network and Defender's Data application access are disabled.

User access review is an internal control to periodically verify that only legitimate users have access to application or infrastructure. During a user access review, an application business or information technology owner may discover that users who left the department or transferred to another team in the department continue to have access to applications or infrastructure after their access credentials or privileges should have been removed. This vulnerability can be exploited resulting in financial and/or reputational loss to the enterprise. However, following some best practices that ensure that unauthorized users do not have access to an application or system can help mitigate this risk.

Objective

To verify the existence and adequacy of internal controls over the termination of access to system applications utilized by Public Defender.

Audit Methodology

To accomplish these objectives, we:

- Obtained and documented all relevant policies and procedures over disabling terminated employee's access to active directory network and Defender's Data application.

Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender Audit

- Conducted interview with department personnel and Riverside County (Information Technology) officials to obtain an understanding on disabling of active directory and Defender's Data application.
- Selected a sample of terminated employees and volunteers to perform testing for our review period.

Finding 2: Disabling Systems' Access Timely

Active directory and defender' data application accounts were not disabled in a timely manner for employees and volunteers no longer with the department. We identified the following in our review of 20 terminated employees (10) and volunteers (10):

- Twenty (100%) out of twenty sampled terminated employees and volunteers did not have ticket requests to Information Technology from the department to disable access to active directory network, and Defender's Data application.
- Three (30%) out of ten sampled terminated employees were not disabled from the active directory network as of the time of our audit fieldwork. Further, to disable the employees accounts from our sample selected, the average time lapsed was 153 days with the longest time lapsed being 738 days and the shortest being 1 day.
- Nine (45%) out of twenty sampled terminated employees and volunteers access accounts were not disabled from Defender's Data application as of the date of our audit fieldwork. The average time lapsed to disable the account from our sample selected was 404 days, with the longest time lapsed being 745 days and the shortest being 17 days.

Recommendation 2.1

Ensure compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*, by disabling Defender's Data application and active directory network on the day of an employee's termination or transferred out from the department.

Management's Response

"Concur. We have now revised our policy and procedure so that disabling Defender Data application and active directory network access is performed on the day of termination from the Department. Please see attached new policy."

**Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender
Audit**

Actual/estimated Date of Corrective Action: **September 29, 2021**

Recommendation 2.2

Ensure that the department have an effective termination procedure including written policy and procedures in disabling access to active directory network and Defender's Data application.

Management's Response

"Concur. We have enacted a policy and procedure to ensure this is accomplished. Please see attached new policy."

Actual/Estimated Date of Corrective Action: **September 29, 2021**

Attachment B

LAW OFFICES OF THE
Public Defender
COUNTY OF RIVERSIDE

STEVEN L. HARMON
PUBLIC DEFENDER

THOMAS M. CAVANAUGH
ASSISTANT PUBLIC DEFENDER

JUDITH GWEON
ASSISTANT PUBLIC DEFENDER



RIVERSIDE MAIN OFFICE
4075 Main Street
Suite 100
Riverside, CA 92501
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Facsimile: (951) 955-6026

The following are the current status of the reported findings and planned corrective actions contained in Internal Audit Report 2022-004: Riverside County Law Offices of the Public Defender, Audit.

Steven L. Harmon

11-1-22

Authorized Signature

Date

Finding 1: Approval for Special Services

Our sample of eleven (37%) out of thirty special service request forms for services exceeding \$2,500 did not have the required approval signatures. According to Public Defender policy and procedure, 501- Purchasing, *Special Service Request Procedures*, "Each special service form must be submitted to and approved by a supervisor and management prior to any special service usage for any case. The level of approval is as follows:

1. A Supervisor may approve items up to \$ 1,000.
2. Items \$ 1,001 - \$ 2,500 require approval of a Supervisor and an Assistant Deputy Public Defender.
3. Items \$ 2,501 and above require approval of the Supervisor and the Public Defender.

For Public Defenders, one signature has been enough for them to move forward since they consider all their cases urgent, requiring prompt attention. Proper authorization will prevent invalid transaction and an internal record that an activity has been reviewed and approved by appropriate authority before it can process or paid. Further, it ensures compliance with its own departmental policy.

Current Status

Reported Finding Corrected?



Yes



No

Recommendation 1

Ensure that in-house service request forms are approved by personnel with appropriate authority as required by departmental policy.

Management Reply

"Concur. Our previous policy of requiring approval of a Supervisor and an Assistant Public Defender for items from \$1,001 to \$2,500 and requiring approval of a Supervisor and the Public Defender for items over \$2,500 is unnecessary since in all these cases the amounts over the limits of the Supervisors. We have now revised our policy to state that for amounts over the limits of the Supervisors, only the Assistant Public Defender or Public Defender need approve amounts up to \$2,500 and the Public Defender or his/her designee need approve amounts over \$2,500. The revised LOPD 501-Purchasing policy has now been enacted. Please see revised policy attached."

Actual/estimated Date of Corrective Action: September 9, 2021

Current Status

Corrective Action: Fully Implemented Partially Implemented Not Implemented

Description of the corrective action taken (or pending action and estimated date of completion for planned corrective action that is partially or not implemented).

See "Management Reply" above, which is now fully implemented as stated.

Finding 2: Disabling Systems' Access Timely

Active directory and defender' data application accounts were not disabled in a timely manner for employees and volunteers no longer with the department. We identified the following in our review of 20 terminated employees (10) and volunteers (10):

- Twenty (100%) out of twenty sampled terminated employees and volunteers did not have ticket requests to Information Technology from the department to disable access to active directory network, and Defender's Data application.
- Three (30%) out of ten sampled terminated employees were not disable from the active directory network as of the time of our audit fieldwork. Further, to disable the employees accounts from our sample selected, the average time lapsed was 153 days with the longest time lapsed being 738 days and the shortest being 1 day.
- Nine (45%) out of twenty sampled terminated employees and volunteers access accounts were not disabled from Defender's Data application as of the date of our audit fieldwork. The average time lapsed to disable the account from our sample selected was 404 days, with the longest time lapsed being 745 days and the shortest being 17 days.

Current Status

Reported Finding Corrected? Yes No

Recommendation 2.1

Ensure compliance with County of Riverside Information Security Standard V1.0, Section 4.1, *Account and Access Management*, by disabling Defender's Data application and active directory network on the day of an employee's termination or transferred out from the department.

Management Reply

“Concur. We have now revised our policy and procedure so that disabling Defender Data application and active directory network access is performed on the day of termination from the Department. Please see attached new policy.”

Actual/estimated Date of Corrective Action: September 29, 2021

Current Status

Corrective Action: Fully Implemented Partially Implemented Not Implemented

Description of the corrective action taken (or pending action and estimated date of completion for planned corrective action that is partially or not implemented).

See “Management Reply” above, which is now fully implemented as stated.

Recommendation 2.2: Implemented at Completion of Initial Audit