

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



ITEM: 2.5
(ID # 27524)

MEETING DATE:
Tuesday, April 08, 2025

FROM : AUDITOR CONTROLLER

SUBJECT: AUDITOR-CONTROLLER: Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit [District: All]; [\$0]

RECOMMENDED MOTION: That the Board of Supervisors:

1. Receive and file Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

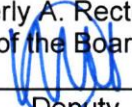
ACTION: Consent


Ben J. Benoit, COUNTY AUDITOR-CONTROLLER 3/28/2025

MINUTES OF THE BOARD OF SUPERVISORS

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

Ayes: Medina, Spiegel, Washington, Perez and Gutierrez
Nays: None
Absent: None
Date: April 8, 2025
xc: Auditor

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	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0
NET COUNTY COST	\$ 0.0	\$ 0.0	\$ 0.0	\$ 0.0
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 Registrar of Voters. Our audit was limited to reviewing actions taken as of January 2, 2025, to correct findings noted in our original audit report 2023-020 dated August 29, 2023. The original audit report contained six recommendations, all of which required implementation to help correct the reported findings.

Based on the results of the audit, we found that of the six recommendations, all six were implemented.

For an in-depth understanding of the original audit, please refer to Internal Audit Report 2023-020 included as an attachment to this follow-up audit report or it can also be found at <https://auditorcontroller.org/divisions/internal-audit/reports>.

Impact on Citizens 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 2025-305: Riverside County Registrar of Voters, Follow-up Audit



Office of Ben J. Benoit
Riverside County Auditor-Controller

Internal Audit Report

2025-305

Follow-up

6 Recommendations

- ✓ 6 Implemented
- ✗ 0 Not Implemented
- ⚡ 0 Not Applicable



Riverside County
Registrar of Voters,
Follow-up Audit
April 8, 2025



**COUNTY OF RIVERSIDE
OFFICE OF THE AUDITOR-CONTROLLER**

Ben J. Benoit, Auditor-Controller
Tanya S. Harris, DPA, CPA, Assistant Auditor-Controller

4080 Lemon Street, 6th Floor
P.O. Box 1326
Riverside, CA 92502-1326
951-955-3800



April 8, 2025

Art Tinoco
Registrar of Voters
Riverside County Registrar of Voters
2724 Gateway Dr.
Riverside, CA 92507

Subject: Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

Dear Mr. Tinoco:

We completed the follow-up audit of Riverside County Registrar of Voters. Our audit was limited to reviewing actions taken as of January 2, 2025, to help correct the findings noted in our original audit report 2023-020 dated August 29, 2023.

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 six recommendations, all of which required implementation to help correct the reported findings. Based on the results of our audit, we found that of the six recommendations, all six were implemented.

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 2023-020 included as "Attachment A" of this audit report along with your department status letter as "Attachment B." You can also find the original audit report at <https://auditorcontroller.org/divisions/internal-audit/reports>.



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

We thank you and your staff for the 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
Juan Perez, Chief Operating Officer
Grand Jury



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

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A. Internal Audit Report 2023-020

B. Status of Findings as Reported by Riverside County Registrar of Voters, Follow-up Audit on January 2, 2025



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

Safeguarding of Personally Identifiable Information

Finding 1: Employee Acknowledgement of PII Training

“The department provides California Election Codes 2194 regarding voters' handling of PII training to new employees. Requiring written employee acknowledgement forms is currently not in place to affirm employee understanding of handling PII. Riverside County Standard Practice Manual 1001, Internal Control, states, ‘Well-documented policies and procedures are established and maintained to promote employee understanding of job duties.’ The department does not have policies and procedures that mandate the use of acknowledgement forms from employees to confirm their agreement to and commitment in following proper PII handling protocols. Lack of employee acknowledgement of understanding can lead to unaddressed misinterpretation of information, decreased accountability in staff and management, and increased risk in unauthorized access to PII.”

Recommendation 1.1

“Establish and collect employee acknowledgement forms of PII handling. The department can consider utilizing the Riverside County Human Resources' provided training on *Personally Identifiable Information* to keep records of employee training.”

Current Status 1.1: Implemented

Recommendation 1.2

“Develop department policies and procedures to ensure written employee acknowledgement forms are completed and collected for new employees to affirm employee understanding of handling PII.”

Current Status 1.2: Implemented

Finding 2: Monitoring System Access rights

“Access rights to identify active accounts for employees no longer with the department are not actively monitored. Three former temporary assignment program employees continue to have access to the Registrar's election information management system (As of May 25, 2023). California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*, (b)(2)(B) and (b)(2)(D), states, ‘Any person who has directly or indirectly obtained voter registration information from a source agency shall practice the principles of ‘least privilege’ by restricting user access to the minimum need based



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

on users' job necessity', and 'Remove, deactivate, or disable accounts or default credentials.' The department does not have procedures to monitor system access rights periodically. Lack of management monitoring increases the risk of untimely update to system access rights, resulting in increased vulnerability to privileged information and liability to the county."

Recommendation 2.1

"Perform periodic department reviews of system access rights to confidential information and update system security access rights in accordance with California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*."

Current Status 2.1: Implemented

Recommendation 2.2

"Develop policies and procedures to ensure timely management review and updates to system access rights."

Current Status 2.1: Implemented



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

System Access Controls

Finding 3: Timely Termination of Access Rights

“Employee access right termination requests are not created and approved in a timely manner. See Table A for a summary of findings.

Table A: Summary of Conditions/Concerns - System Access Controls

System	Findings
Active Directory	Seven out of 7 (100%) separated employees did not have their Active Directory account termination requests created and approved in a timely manner. The average time elapsed between employee departure and ticket approval was 78 days, with the longest taking 173 days for approval and the shortest taking 5 days.
	One out of 7 (14%) separated employees remained active as of June 7, 2023, 356 days after employee departure.

County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*, states, ‘Accounts for terminated or transferred employees shall be disabled or removed on the day of termination or transfer.’ Written procedures to ensure the compliance with 24-hour disabling of accounts for departed employees as stated in Riverside County Information Technology Security Standards are currently not in place. Additionally, the Registrar stated Active Directory accounts were kept active to allow access to the former employees' email accounts. Allowing accounts to remain open after employment has ended exposes the department to risk where information maintained in department systems can be continuously accessed by individuals who no longer have a right or need to know. Depending on the sensitivity of the information maintained by department systems, it can create administrative issues and have a financial impact if held liable.”

Recommendation 3.1

“Communicate with Riverside County Information Technology department for an alternative to archiving former employees' electronic records for business use instead of maintaining their email addresses active after employee separation.”

Current Status 3.1: Implemented



Internal Audit Report 2025-305: Riverside County Registrar of Voters, Follow-up Audit

Recommendation 3.2

“Develop policies and procedures to ensure the disabling of accounts are requested and approved within 24 hours of an employee separation or transfer from the department.”

Current Status 3.2: Implemented

Internal Audit Report 2023-020

**Riverside County
Registrar of Voters
Audit**

Report Date: August 29, 2023



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

www.auditorcontroller.org



**COUNTY OF RIVERSIDE
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Ben J. Benoit
Riverside County Auditor-Controller

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

August 29, 2023

Rebecca Spencer
Registrar of Voters
Riverside County Registrar of Voters
2724 Gateway Dr.
Riverside, CA 92507

Subject: Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Dear Ms. Spencer:

In accordance with Board of Supervisors Resolution 83-338, we completed an audit of the Riverside County Registrar of Voters to provide management and the Board of Supervisors with an independent assessment of internal controls over safeguarding of personally identifiable information and system access 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 2023-020: Riverside County Registrar of Voters 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.

We thank you and your staff for the 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, Jr., County Executive Officer
Dave Rogers, Chief Administrative Officer
Grand Jury

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

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Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Executive Summary

Overview

The Registrar of Voters (Registrar) is responsible for providing equal access for all eligible citizens in Riverside County to participate in the democratic process. The Registrar is also entrusted with protecting the integrity of votes and maintaining transparent, accurate, and fair elections for federal, state, and local offices. Registrar of Voters has a recommended budget of \$14.3 million for FY 2023/24 and 42 recommended positions to execute its responsibilities *County of Riverside, Fiscal Year 2023/24 Recommended Budget, 323*.

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 safeguarding of personally identifiable information and system access 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 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 February 22, 2023, through June 13, 2023, for operations from July 1, 2021, through June 7, 2023. Following a risk-based approach, our scope initially included the following:

- Operating Expenditures
- Safeguarding of Personally Identifiable Information
- System Access Controls

Through inquiry, observations, and limited examination of relevant documentation, it was determined through a risk assessment of the business processes for operating expenditures, that the risk exposure to the Registrar associated with these processes are well mitigated with internal controls and are functioning as designed. Therefore, we focused our audit scope to internal controls over safeguarding of personally identifiable information and system access controls.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Audit Highlights

Summary of Existing Conditions

- Currently, there is no written employee acknowledgement in place to affirm employee understanding of handling personally identifiable information (PII). The absence of such employee acknowledgement of understanding can lead to unaddressed misinterpretation of information, decreased accountability in staff and management, and increased risk in unauthorized access to PII.
- System access rights to identify active accounts for employees no longer with the department is not actively monitored. Lack of management monitoring increases the risk of untimely update to system access rights, resulting increased vulnerability to privileged information and liability to the County.
- Active Directory access rights for separated employees were not disabled timely. Additionally, an account remained active as of May 25, 2023, after an employee ended employment with the department. When an account is not closed immediately after an employee separation or transfer, there is a security risk to the information maintained in the systems used by the department.

Summary of Improvement Opportunities

- Establish and collect employee acknowledgement receipts of PII handling. The department can consider utilizing the Riverside County Human Resources' provided training on *Personally Identifiable Information* to keep records of employee training.
- Develop department policies and procedures to ensure written employee acknowledgement forms are completed and collected for newly onboarded employees to affirm employee understanding of handling PII.
- Perform a department review of system access rights to confidential information and update system security access rights in accordance with California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*.
- Develop policies and procedures to ensure timely management review and updates to system access rights.
- Communicate with Riverside County Information Technology department for an alternative to archiving former employees' electronic records for business use instead of maintaining their email accounts active after employee separation.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

- Develop policies and procedures to ensure the disabling of accounts are requested and approved within 24 hours of an employee separation or transfer from the department.

Audit Conclusion

Based upon the results of our audit, we identified opportunities for improvement of internal controls relating to safeguarding of personally identifiable information and system access controls.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Safeguarding of Personally Identifiable Information

Background

Personally identifiable information (PII) is any direct or indirect information that can be used to identify a specific individual. This information includes an individual name, address, social security number, date of birth, email address, phone number, passport number, or driver's license number. State Election Code Section 2194, (b) (1), states, "Notwithstanding any other law, the California driver's license number, the California identification card number, the social security number, and any other unique identifier used by the State of California for purposes of voter identification shown on the affidavit of voter registration of a registered voter, or added to voter registration records {...} are confidential and shall not be disclosed to any person." Government Code, *Voter Information*, §7924.000 (a), states, "Except as provided in Section 2194 of the Elections Code, both of the following are confidential and shall not be disclosed to any person: (1) The home address, telephone number, email address, precinct number, or other number specified by the Secretary of State for voter registration purposes.(2) Prior registration information shown on an affidavit of registration."

The department collects and maintains PII of voters to mail out ballots. Physical copies of voter registrations are maintained in an area with limited access.

Objective

To verify the existence and adequacy of internal controls over safeguarding of PII.

Audit Methodology

To accomplish these objectives, we:

- Obtained an understanding of Board Policy A-58, California Election Codes 2194, and California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*.
- Requested the department policies and procedures over training on PII.
- Conducted interviews and performed walk-throughs with department's personnel over safeguarding of PII.
- Verified if training on PII is provided to employees.
- Verified if copies of employee training acknowledgement are maintained.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

- Performed on-site visit to review records management, records destruction, and verified access to physical originals containing PII is restricted.
- Verified if access to applications which store PII is updated to remove departed employees.

Finding 1: Employee Acknowledgement of PII Training

The department provides California Election Codes 2194 regarding voters' handling of PII training to new employees. Requiring written employee acknowledgement forms is currently not in place to affirm employee understanding of handling PII. Riverside County Standard Practice Manual 1001, *Internal Control*, states, "Well-documented policies and procedures are established and maintained to promote employee understanding of job duties." The department does not have policies and procedures that mandate the use of acknowledgement forms from employees to confirm their agreement to and commitment in following proper PII handling protocols. Lack of employee acknowledgement of understanding can lead to unaddressed misinterpretation of information, decreased accountability in staff and management, and increased risk in unauthorized access to PII.

Recommendation 1.1:

Establish and collect employee acknowledgement forms of PII handling. The department can consider utilizing the Riverside County Human Resources' provided training on *Personally Identifiable Information* to keep records of employee training.

Management's Response:

"Concur. All staff are currently trained on the confidentiality of PII. We will add a written employee acknowledgement form as part of our new employee orientation packet."

Actual/Estimated Date of Corrective Action: September 1, 2023.

Recommendation 1.2:

Develop department policies and procedures to ensure written employee acknowledgement forms are completed and collected for new employees to affirm employee understanding of handling PII.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Management's Response:

"Concur. All staff are currently trained on the confidentiality of PII. We will add a written employee acknowledgement form as part of our new employee orientation packet."

Actual/Estimated Date of Corrective Action: January 1, 2024.

Finding 2: Monitoring System Access rights

Access rights to identify active accounts for employees no longer with the department are not actively monitored. Three former temporary assignment program employees continue to have access to the Registrar's election information management system (As of May 25, 2023). California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*, (b)(2)(B) and (b)(2)(D), states, "Any person who has directly or indirectly obtained voter registration information from a source agency shall practice the principles of "least privilege" by restricting user access to the minimum need based on users' job necessity", and "Remove, deactivate, or disable accounts or default credentials." The department does not have procedures to monitor system access rights periodically. Lack of management monitoring increases the risk of untimely update to system access rights, resulting increased vulnerability to privileged information and liability to the county.

Recommendation 2.1:

Perform periodic department reviews of system access rights to confidential information and update system security access rights in accordance with California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*.

Management's Response:

"Concur. Management currently reviews system access rights prior to each election. We will increase the frequency in which system access rights are reviewed."

Actual/Estimated Date of Corrective Action: January 1, 2024.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Recommendation 2.2:

Develop policies and procedures to ensure timely management review and updates to system access rights.

Management's Response:

"Concur. Management currently reviews system access rights prior to each election. We will increase the frequency in which system access rights are reviewed."

Actual/Estimated Date of Corrective Action: January 1, 2024.

System Access Controls

Background

System access controls within information systems ensure proper confidentiality, integrity, and availability to the data stored within the system. Sensitive information is any information that must be protected from unauthorized access to maintain the information security of an organization or an individual. Authentication is a control which confirms a user's identity to provide access to a systems sensitive information. Authentication is often achieved by using login credentials such as a username and password. Authentication relies on the presumption that the user is authorized to use the system and that only the user knows the login credentials to gain access.

Active Directory is a directory service which allows Riverside County Information Technology and the County Registrar of Voters to manage permissions and access to network resources, and linked data applications utilized by the department. When a user ends employment with the Registrar, it is the department's responsibility to create and approve a help desk ticket to request the removal of the departed employees' access rights to their Active Directory account. Once the ticket is approved by the Registrar's personnel, Riverside County Information Technology is notified to disable Active Directory to remove permissions and network access.

System applications can be linked to Active Directory in a such a way that terminating Active Directory accounts will also terminate access to the linked system applications. For system applications not linked to Active Directory, county departments must manually terminate accounts for employees no longer employed with the department.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Additionally, external agencies or entities may grant Riverside County employees' access to system applications, at which point it is the responsibility of county departments to request account terminations upon an employee's separation from the department.

Objective

To verify the existence and adequacy of internal controls over system access rights upon employee separation.

Audit Methodology

To accomplish these objectives, we:

- Obtained an understanding of County of Riverside Information Security Standard v1.0.
- Interviewed key personnel regarding the department's employee access termination processes.
- Obtained a listing of employees who had access to Active Directory during the audit review period.
- Obtained report from Riverside County Information Technology that detailed Registrar of Voters ticket creation and approval dates for disabling employee access to Active Directory.
- Verified whether access rights to the system applications linked to Active Directory were disabled within 24 hours of employee departure from the department.
- Verified whether requests to disable Active Directory access right were created and approved by department personnel within 24 hours of the employee departure from the department.

Finding 3: Timely Termination of Access Rights

Employee access right termination requests are not created and approved in a timely manner. See Table A for a summary of findings.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Table A: Summary of Conditions/Concerns - System Access Controls

System	Findings
Active Directory	Seven out of 7 (100%) separated employees did not have their Active Directory account termination requests created and approved in a timely manner. The average time elapsed between employee departure and ticket approval was 78 days, with the longest taking 173 days for approval and the shortest taking 5 days.
	One out of 7 (14%) separated employees remained active as of June 7, 2023, 356 days after employee departure.

County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*, states, “Accounts for terminated or transferred employees shall be disabled or removed on the day of termination or transfer.” Written procedures to ensure the compliance with 24-hour disabling of accounts for departed employees as stated in Riverside County Information Technology Security Standards are currently not in place. Additionally, the Registrar stated Active Directory accounts were kept active to allow access to the former employees’ email accounts. Allowing accounts to remain open after employment has ended exposes the department to risk where information maintained in department systems can be continuously accessed by individuals who no longer have a right or need to know. Depending on the sensitivity of the information maintained by department systems, it can create administrative issues and have a financial impact if held liable.

Recommendation 3.1:

Communicate with Riverside County Information Technology department for an alternative to archiving former employees’ electronic records for business use instead of maintaining their email addresses active after employee separation.

Management’s Response:

“**Partially Concur.** Our current practice is to change all passwords for departed employees. This ensures that the employees no longer have access but allows for the department to continue to have access to their electronic files for cross training purposes. We will work with RCIT to for an alternative solution.”

Actual/Estimated Date of Corrective Action: January 1, 2024.

Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit

Recommendation 3.2:

Develop policies and procedures to ensure the disabling of accounts are requested and approved within 24 hours of an employee separation or transfer from the department.

Management's Response:

"Partially Concur. Our current practice is to change all passwords for departed employees. This ensures that the employees no longer have access but allows for the department to continue to have access to their electronic files for cross training purposes. We will work with RCIT to for an alternative solution."

Actual/Estimated Date of Corrective Action: January 1, 2024.

Attachment B

Art Tinoco
Registrar of Voters



Matthew Ceballos
Assistant Registrar of Voters

The following are the current status of the reported findings and planned corrective actions contained in Internal Audit Report 2023-020: Riverside County Registrar of Voters Audit.

1/2/2025

Authorized Signature

Date

Finding 1: Employee Acknowledgement of PII Training

"The department provides California Election Codes 2194 regarding voters' handling of PII training to new employees. Requiring written employee acknowledgement forms is currently not in place to affirm employee understanding of handling PII. Riverside County Standard Practice Manual 1001, *Internal Control*, states, 'Well-documented policies and procedures are established and maintained to promote employee understanding of job duties.' The department does not have policies and procedures that mandate the use of acknowledgement forms from employees to confirm their agreement to and commitment in following proper PII handling protocols. Lack of employee acknowledgement of understanding can lead to unaddressed misinterpretation of information, decreased accountability in staff and management, and increased risk in unauthorized access to PII."

Current Status

Reported Finding Corrected? ☒ Yes ☐ No

The department has developed policies and procedures regarding the training and safeguarding of PPI. All employees, both permanent and temporary staff, are required to sign an Acknowledgement Form confirming their understanding of the Confidentiality Requirements of PII. See attached department policy H-13.

Recommendation 1.1

"Establish and collect employee acknowledgement forms of PII handling. The department can consider utilizing the Riverside County Human Resources' provided training on *Personally Identifiable Information* to keep records of employee training."



Management Reply

"Concur. All staff are currently trained on the confidentiality of PII. We will add a written employee acknowledgement form as part of our new employee orientation packet."

Actual/Estimated Date of Corrective Action: September 1, 2023.

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).

The department has added a written employee acknowledgement form as part of our new employee orientation packet for both permanent and temporary staff. See attached department policy H-13.

Recommendation 1.2

"Develop department policies and procedures to ensure written employee acknowledgement forms are completed and collected for new employees to affirm employee understanding of handling PII."

Management Reply

"Concur. All staff are currently trained on the confidentiality of PII. We will add a written employee acknowledgement form as part of our new employee orientation packet."

Actual/Estimated Date of Corrective Action: January 1, 2024.

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).

The department has developed policies and procedures to ensure written employee acknowledgement forms are completed and collected for new employees to affirm employee understanding of handling PII. See attached department policy H-13.

Finding 2: Monitoring System Access Rights

"Access rights to identify active accounts for employees no longer with the department are not actively monitored. Three former temporary assignment program employees continue to have access to the Registrar's election information management system (As of May 25, 2023). California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*, (b)(2)(B) and (b)(2)(D), states, 'Any person who has directly or indirectly obtained voter registration information from a source agency shall practice the principles of 'least privilege' by restricting user access to the minimum need based on users' job necessity', and 'Remove, deactivate, or disable accounts or default credentials.' The department does not have procedures to monitor system access rights periodically. Lack of management monitoring increases the risk of untimely update to system access rights, resulting increased vulnerability to privileged information and liability to the county."

Current Status

Reported Finding Corrected? ☒ Yes ☐ No

The Registrar of Voters receives a monthly report from HR containing a list of recently terminated employees that still have an Active Directory Account. Department action is taken through RCIT Service Now to terminate all Active Directory Accounts associated with that employee. See department policy H-14.

Recommendation 2.1

"Perform periodic department reviews of system access rights to confidential information and update system security access rights in accordance with California Code of Regulations, Title 2, Division 7, Chapter 1, Article 1, §19012, *Requirements for Storage and Security of Voter Registration Information*."

Management Reply

"Concur. Management currently reviews system access rights prior to each election. We will increase the frequency in which system access rights are reviewed."

Actual/Estimated Date of Corrective Action: January 1, 2024.

Current Status

Reported Finding Corrected? ☒ Yes ☐ No



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

The Registrar of Voters receives a monthly report from HR containing a list of recently terminated employees that still have an Active Directory Account. Department action is taken through RCIT Service Now to terminate all Active Directory Accounts associated with that employee. See department policy H-14.

Recommendation 2.2

"Develop policies and procedures to ensure timely management review and updates to system access rights."

Management Reply

"Concur. Management currently reviews system access rights prior to each election. We will increase the frequency in which system access rights are reviewed."

Actual/Estimated Date of Corrective Action: January 1, 2024.

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).

The Registrar of Voters receives a monthly report from HR containing a list of recently terminated employees that still have an Active Directory Account. Department action is taken through RCIT Service Now to terminate all Active Directory Accounts associated with that employee. See department policy H-14.

Finding 3: Timely Termination of Access Rights

“Employee access right termination requests are not created and approved in a timely manner. See Table A for a summary of findings.

Table A: Summary of Conditions/Concerns - System Access Controls

System	Findings
Active Directory	Seven out of 7 (100%) separated employees did not have their Active Directory account termination requests created and approved in a timely manner. The average time elapsed between employee departure and ticket approval was 78 days, with the longest taking 173 days for approval and the shortest taking 5 days.
	One out of 7 (14%) separated employees remained active as of June 7, 2023, 356 days after employee departure.

County of Riverside Information Security Standard v1.0, Section 4.1, *Account and Access Management*, states, ‘Accounts for terminated or transferred employees shall be disabled or removed on the day of termination or transfer.’ Written procedures to ensure the compliance with 24-hour disabling of accounts for departed employees as stated in Riverside County Information Technology Security Standards are currently not in place. Additionally, the Registrar stated Active Directory accounts were kept active to allow access to the former employees’ email accounts. Allowing accounts to remain open after employment has ended exposes the department to risk where information maintained in department systems can be continuously accessed by individuals who no longer have a right or need to know. Depending on the sensitivity of the information maintained by department systems, it can create administrative issues and have a financial impact if held liable.”

Current Status

Reported Finding Corrected? ☒ Yes ☐ No

The department communicated with RCIT and confirmed that it is the department head’s discretion to request the terminated employee accounts have delegate access for reference purposes. See department policy H-15.

Per RCIT: When delegate access is provided, the terminated employee’s Active Directory (AD) account is disabled, ensuring the former employee no longer has access. However, delegate access remains in effect, allowing the designated staff member to manage and reference the inbox as needed. Delegating access to the email account is being done with the Active Directory account disabled, which means the users account is not accessible or at any risk.



Recommendation 3.1

“Communicate with Riverside County Information Technology department for an alternative to archiving former employees' electronic records for business use instead of maintaining their email addresses active after employee separation.”

Management Reply

"Partially Concur. Our current practice is to change all passwords for departed employees. This ensures that the employees no longer have access but allows for the department to continue to have access to their electronic files for cross training purposes. We will work with RCIT to for an alternative solution."

Actual/Estimated Date of Corrective Action: January 1, 2024.

Current Status

Corrective Action: ☒ Fully Implemented ☐ Partially Implemented ☐ Not Implemented

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Recommendation 3.2

"Develop policies and procedures to ensure the disabling of accounts are requested and approved within 24 hours of an employee separation or transfer from the department."

Management Reply

"Partially Concur. Our current practice is to change all passwords for departed employees. This ensures that the employees no longer have access but allows for the department to continue to have access to their electronic files for cross training purposes. We will work with RCIT to for an alternative solution."

Actual/Estimated Date of Corrective Action: January 1, 2024.

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✓

**Riverside County Board of Supervisors
Request to Speak**

Submit request to Clerk of Board (right of podium), Speakers are entitled to three (3) minutes, subject to Board Rules listed on the reverse side of this form. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

SPEAKER'S NAME: Greg Langworthy

Address: _____
(Only if follow-up mail response requested)

City: _____ **Zip:** _____

Phone #: _____

Date: April 8, 2025 **Agenda #** 2.5

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

_____ **Support** _____ **Oppose** X _____ **Neutral**

Note: If you are here for an agenda item that is filed for "Appeal", please state separately your position on the appeal below:

_____ **Support** _____ **Oppose** _____ **Neutral**

I give my 3 minutes to: _____

Parking validations available for speakers only – see Clerk of the Board.

(Revised: 06/13/2024)

BOARD RULES

Requests to Address Board on "Agenda" Items:

You may request to be heard on a published agenda item. Requests to be heard must be submitted to the Clerk of the Board before the scheduled meeting time.

Requests to Address Board on items that are "NOT" on the Agenda:

Notwithstanding any other provisions of these rules, member of the public shall have the right to address the Board during the mid-morning "Oral Communications" segment of the published agenda. Said purpose for address must pertain to issues which are under the direct jurisdiction of the Board of Supervisors. YOUR TIME WILL BE LIMITED TO THREE (3) MINUTES. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board.

Power Point Presentations/Printed Material:

Speakers who intend to conduct a formalized Power Point presentation or provide printed material must notify the Clerk of the Board's Office by 12 noon on the Monday preceding the Tuesday Board meeting, ensuring that the Clerk's Office has sufficient copies of all printed materials and at least one (1) copy of the Power Point CD. Copies of printed material given to the Clerk (by Monday noon deadline) will be provided to each Supervisor. If you have the need to use the overhead "Elmo" projector at the Board meeting, please ensure your material is clear and with proper contrast, notifying the Clerk well ahead of the meeting, of your intent to use the Elmo. **Speakers are prohibited from bringing signs, placards, or posters into the hearing room.**

Individual Speaker Limits:

Individual speakers are limited to a maximum of three (3) minutes. The Board may limit the public input on any item, based on the number of people requesting to speak and the business of the Board. Please step up to the podium when the Chair calls your name and begin speaking immediately. Pull the microphone to your mouth so that the Board, audience, and audio recording system hear you clearly. Once you start speaking, the "green" podium light will light. The "yellow" light will come on when you have one (1) minute remaining. When you have 30 seconds remaining, the "yellow" light will begin flash, indicating you must quickly wrap up your comments. Your time is up when the "red" light flashes. The Chair adheres to a strict three (3) minutes per speaker. ***Note: If you intend to give your time to a "Group/Organized Presentation", please state so clearly at the very bottom of the reverse side of this form.***

Group/Organized Presentations:

Group/organized presentations with more than one (1) speaker will be limited to nine (9) minutes at the Chair's discretion. The organizer of the presentation will automatically receive the first three (3) minutes, with the remaining six (6) minutes relinquished by other speakers, as requested by them on a completed "Request to Speak" form, and clearly indicated at the front bottom of the form.

Addressing the Board & Acknowledgement by Chair:

The Chair will determine what order the speakers will address the Board and will call on all speakers in pairs. The first speaker should immediately step to the podium and begin addressing the Board. The second speaker should take up a position in one of the chamber aisles to quickly step up to the podium after the preceding speaker. This is to afford an efficient and timely Board meeting, giving all attendees the opportunity to make their case. Speakers are prohibited from making personal attacks, and/or using course, crude, profane or vulgar language while speaking to the Board members, staff, the public and/or meeting participants. Such behavior, at the discretion of the Board Chair may result in removal from the Board Chambers by Sheriff Deputies.

✓

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SPEAKER'S NAME: Roy Beakmont

Address: _____
(Only if follow-up mail response requested)

City: _____ **Zip:** _____

Phone #: _____

Date: _____ **Agenda #** 2.5

PLEASE STATE YOUR POSITION BELOW:

Position on "Regular" (non-appealed) Agenda Item:

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(Revised: 06/13/2024)

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