

Office of Independent Internal Audit LAVOIS CAMPBELL, CHIEF AUDIT EXECUTIVE

FINAL

July 15, 2025

Felecia A Green
Deputy CIO
Dept of Innovation & Technology
Bobby Burgess Building
3630 Camp Circle, Suite 301
Georgia, 30032

RE: 3rd Follow-Up - Management of Personally Identifiable Information (PII) - Audit Report No. 2019-009-IT

Dear Ms. Green:

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section10A-Independent Internal Audit (I), I have attached the Office of Independent Internal Audit's report on the status of management actions taken to address the findings contained in the referenced audit report. The conclusions in this follow-up report are limited to the status of the implementation and not the effectiveness of the completed action plans, which may be assessed in a future audit.

This report provides the results of our 3rd follow-up to verify the status of management action plans to address the remaining two findings.

Management is working to complete all the corrective action plans. Delays were due to staff and leadership changes in the Department of Innovation and Technology. The expectation is that Findings #2 and #3 will be completed by Q4 2025. We will follow up after these dates to verify the completion of the action plan(s).

Figure 1 - Status of Management Actions Plans

	igure i etatae et management tetrone i lane					
Finding No.	Report Findings	Status at 1st Follow-up December 08, 2022	Status at 2nd Follow-up June 18, 2024	Status at 3rd Follow-up July 02, 2025		
1	The County Has Not Designated A Process Owner to Manage PII.	Closed				
2	There Were No Documented Policies and Procedures For The Management And Protection Of PII.	Partially Complete	Partially Complete	Partially Complete		
3	The County Did Not Have an Awareness and Training Program For PII.	Partially Complete	Partially Complete	Partially Complete		
4	The County Did Not Have an Incident Response Process in Place For PII	Closed				
5	There Were No Guidelines in Place for Managing PII With Third-Party Service Providers.	Closed				

Please contact me if you require additional information.

Sincerely,

Lavois Campbell, CFE, CISA, CIA, CGA-CPA

Chief Audit Executive

Lavois Campbell

Cc: Lorraine Cochran-Johnson, Chief Executive Officer Robert Patrick, Board of Commissioners District 1 Michelle Long Spears, Board of Commissioners District 2 Nicole Massiah. Board of Commissioners District 3 Chakira Johnson, Board of Commissioners District 4 Mereda Davis Johnson. Board of Commissioners District 5 Ted Terry, Board of Commissioners Super District 6 LaDena Bolton, Board of Commissioners Super District 7 Tanja Christine Boyd-Witherspoon, Chairperson, Audit Oversight Committee Adrienne T. McMillion, Vice -Chairperson, Audit Oversight Committee Lisa Earls, Audit Oversight Committee Michael Lopata, Audit Oversight Committee Petrina Bloodworth, Audit Oversight Committee Dr. G. Leah Davis, CEO's Chief of Staff Zachary L. Williams, Chief Operating Officer/ Executive Assistant William Jones, CIO, Department of Innovation & Technology Felecia Green, Deputy CIO, Department of Innovation & Technology





Office of Independent Internal Audit LAVOIS CAMPBELL, CHIEF AUDIT EXECUTIVE

FINAL

		Deka	lb County Gov	ernment					
	Dekalb County Government Office of Independent Internal Audit								
_		Office of	independent i						
Da	ate: July 02, 2025			Prepared by:	Julie Ikloda				
			idings Status I	Jpdate Form					
	Status Date	Report#			Report Title				
	July 02, 2025	2019-009-IT			f Personally Identifiable Information (PII)				
	Contact Person	Title		Phone No.	Email Address				
	Felecia Alston Green	Deputy	CIO	470-330-5371	flalston@dekalbcountyga.gov				
	Activity	Accounta	bility		Schedule				
		Responsib	le Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made				
		Policies and P	rocedures						
	Follow Up			N/A	New Timeline - Q4, 2025.				
	Finding	_		ri-dip	-4-11				
_	No. 2 Date 8/1/21	_		Finding D	etail				
	Finding	There Were No Docum	nented Policies And	d Procedures For T	he Management And Protection Of PII				
	Recommendations	We recommend that i	management devel	nn imnlement and	d publish comprehensive County-wide PII policies and				
	Recommendations		•		t not be limited to, the following topics:				
		Definition of PII.		-,	- · · · · · · · · · · · · · · · · · · ·				
		Inventory of PII colle	ected by the Count	/ -					
		Classification of PII.							
		Access rules for PII, especially electronic PII.							
		PII retention and disposal schedules and procedures.							
		Limitations on the collection, disclosure, maintenance, sharing, and use of PII. Roles and responsibilities for collecting, processing, and protecting PII.							
	Management Response	DoIT Management Agreement: ☑ Agree □Disagree□							
	Management Response	Management agrees that policies and procedures need to be reviewed and enhanced. Having said that, there are							
		policies and procedures under the auspices of DoIT that do govern electronic PII. DoIT abides by the National							
		Institute of Standards and Technology Special Publication 800-122 Guide to Protecting the Confidentiality of							
		Personally Identifiable Information (PII) https://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-							
		122.pdf. There is also a DeKalb Cyber Incident Response procedure document that governs how the County							
		responds to cyber-related incidents, which would include any compromise associated with PII data.							
		Over the next 6 months, management will work on the coordinated enhancement of the governing documents and guidelines and create DeKalb County-specific PII references in policies and or create new ones as needed.							
		8	,						
		Estimated Timeline to	Estimated Timeline to Implement Action Plan: Year-end 2021						
_	Status Update-12 months	2022 Response:							
	Open	DoIT policies which have over-reaching application to the entire DeKalb County government enterprise have been							
Х	Management/Agency Assumes Risk Partially Complete	revised to specifically call out PII and shall be the basis by which other policies conform to. HR is working to							
^	Complete Pending Verification by OIIA	complete its PII policy for HR related information by the middle of November. DoIT anticipates that the action plan will be completed by 3/31/2023.							
	Closed	pian win be completed	pian will be completed by 5/31/2025.						
	OliA Assessment - June 18, 2024	Management Status	Update & OliA Co	mments					
	Open	Management Response:							
Management/Agency Assumes Risk DolT implemented a PII policy in 2022 and updated it in late 2023. The policies are				2023. The policies are also published to the Intranet					
Х	Partially Complete	DoIT has also collaborated with the HR department, and training is provided both in New Employee Orientation as							
	Complete Pending Verification by OIIA	well as job specific training as needed, and addressed in finding 3.							
		OIIA Comments DoIT provided a copy of the PII Compliance Policy last revised on June 18, 2024. The policy includes the topics							
	Closed	recommended in the Audit report issued. It is anticipated that the PII procedures will be developed by end of July							
		2024.							
	OliA Assessment - July 02, 2025 Management Status Update & OliA Comments								
	OliA Assessment - July 02, 2025	_	•	mments					
	Open	Management Respons		nomplotica data at	COA 2025				
v	Management/Agency Assumes Risk	Currently under review	Currently under review with anticipated completion date of Q4 2025						
Х	Partially Complete Complete Pending Verification by OIIA	OIIA Comments:							
	complete renaing vernication by OliA	The finding is Partially Complete because the PII procedures have not been developed.							
		The finding is Partially	Complete because	the PII procedure:	s have not been developed.				
	Closed	The finding is Partially Anticipated completion	•	•	s have not been developed.				





Office of Independent Internal Audit LAVOIS CAMPBELL, CHIEF AUDIT EXECUTIVE

FINAL

Departments	,	Dekalb County Government						
Status Date Report Ele 77/725 2019-009-11 Audit of Management of Personally Identifiable Information (PI)			Office	e of Independe	ent Internal A	udit		
Status Date Report Ele 77/725 2019-009-11 Audit of Management of Personally Identifiable Information (PI)	Date:	July 2, 2025		•				
Status Date Report Title Phone No. Email Address				t Findings Stat				
Contact Person Felera Akton Oreen Deputy CIO 470-30-3577 Distlanding designation (PII)		Status Date						
Teleca Aston Green Peters Activity Accountability Available Anticipated Complete on Date Date Adjustments will be me New Timedine - Q4 2025 Finding The County Did Not Have an Awareness And Training Program For PII Recommendations Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of the County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did Not Have an Awareness And Training Program For PII Peters of County Did					Audit of Manager	'		
Feleda Astoni Green Activity Activity Responsible Area Avareness and Training No. 3 Date 8/1/21 Recommendations We recommend that management: - Develop a training plan and implementation approach. - Define roles and responsibilities for training program for PII - Applicable privacy laws, regulations, and policies. - Restrictions on the collection, storage, and use of PII. - Repossible of second privacy laws, regulations, and policies. - Restrictions on the collection storage, and use of PII. - Repossible in responsibilities of rushing part responsibilities in responsibilities for using and protecting PII. - Repossible responsibilities in responsibilities in responsibilities of rushing and reporting Management Response Management Response Management Response Open member Agreement X-Bapee CDospgrees Management Agreeny Assumes Risk - Partially Complete Complete Pending Verification by OIIA. Organizations Agreement Agreeme				2	_			
Activity Accountability Follow Up Finding Finding Finding Recommendations Finding The County Did Not Have an Awareness And Training Program For PII We recommend that management: Open a complete Product of PII. Recommendations Product of PII. Recommendations of PII. Product of PII. Product of PII. Representation of PII. Product of PII. Representation of PII. Product of PII. Recommendation of PII. Recommendation of PII. Representation of PII. Representation of PII. Recommendation of PIII. Recommendation of PII. Recommenda								
Responsible Area					470-330-5371			
Finding No. 3 Second Process and Training No. 1 New Timeline - Q4 2025		Activity			Reneat Finding			
Status Update-12 months Status Update-12 months Open Management Response Management Will convert the teaching the discussion of Pull Assessment - June 16, 2024 His Keelepping countywide training that will include the involvement (roles and responsibilities) and policies. Status Update-12 months Status Update-12 months Open Management Will convert the teaching press and deposition of Pull - Applicable privacy laws. regulations, and policies Pull - Applicable privacy laws. regulations of security or privacy incidents involving PII. Pull - Applicable privacy laws. regulations of security or privacy incidents involving PII. Pull - Applicable privacy laws. regulations of security or privacy incidents involving PII. Pull - Applicable privacy laws. regulations of security or privacy incidents involving PII. Pull - Applicable privacy laws. regulations. Pull -		Follow Up						
No. 3 1					N/A	New Timeline - Q4 2025		
Recommendations		Finding						
Recommendations					Fine	ding Detail		
We recommend that management: - Develop a Training plan and implementation approach Define roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training requirement Further, we recommend training topics include, but not be limited to, the following: - The definition of PII Applicable privacy laws, regulations, and policies Restrictions on the collection, storage, and use of PII Roles and responsibilities for using and protecting PII Appropriate disposal of PII Recognition of security or privacy incidents involving PII Recognition in shedules for PIII Recention schedules for PIII Recention sc	Date		The County Bid New I		A d T''	East Dill		
Develop a training plan and implementation approach. Define roles and responsibilities for training prerequisites for receiving access to PII, and ongoing training requirements further, we recommend training topics include, but not be limited to, the following: The definition of PIII Applicable privacy laws, regulations, and policies. Restrictions on the collection, storage, and use of PIII. Applicable privacy laws, regulations, and policies. Restrictions on the collection, storage, and use of PIII. Appropriate disposal of PIII. Roles and responsibilities for suing and protecting PIII. Appropriate disposal of PIII. Recognition of security or privacy incidents involving PIII. Recognition of security or privacy		Finding	The County Did Not F	ave an Awareness	And Training Progr	am For PII		
- Define roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training requirement Further, we recommend training topics include, but not be limited to, the following: - The definition of PII Applicable privacy laws, regulations, and policies Restrictions on the collection, storage, and use of PII Roles and responsibilities for using and protecting PII Recognition of security or privacy incidents involving PII Recognition of PII Recogni		Recommendations	We recommend that	management:				
Further, we recommend training topics include, but not be limited to, the following: - The definition of PII Applicable privacy laws, regulations, and policies Restrictions on the collection, storage, and use of PII Appropriate disposal of PII Appropriate disposal of PII Reception of Security or privacy incidents involving PII Retention schedules for PII Reception of Security or privacy incidents involving PII Retention schedules for PII Partially Complete Pending Verification by OIIA - Retention schedules for PII Partially Complete Pin PII Partially Complete Pin Pin Pin Schedules Pin								
The definition of PIL Applicable privacy laws, regulations, and policies. Restrictions on the collection, storage, and use of PIL Roles and responsibilities for using and protecting PII. Recognition of security or privacy incidents involving PII. Retention schedules for PII. Roles and responsibilities in responding to PIII-related incidents and reporting DOIT Management Agreement: Status Update-12 months DOIT Management Agreement: Status Update-12 months Doen Josen Jose				•	•			
Papticulise privacy laws, regulations, and policies. Petrictions on the collection, storage, and use of PIL. Roles and responsibilities for using and protecting PIL. Papting privacy laws, regulations, and policies. Recognition of security or privacy incidents involving PIL. Recognition of security or privacy incidents involving PIL. Retention schedules for PIL. Recognition of security or privacy incidents involving PIL. Retention schedules for PIL. Recognition of security or privacy incidents involving PIL. Recognition of security or privacy incidents involving PIL. Recognition of security or privacy incidents involving PIL. Recognition of security or privacy involving PIL-related incidents and reporting Management Response Management Response Status Update-12 months Open Management Agrency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed OIIA Assessment - June 18, 2024 Management Response: Risk are seasessed PIL training needs and modified the approach as follows: HR will continue to provide the following PIL. Seases are required to complete confidentiality statements, which cover PIL. Additionally, proper use training by the privacy and protecting PIL. Closed OIIA Assessment - July 02, 2025 OIIA Comments Closed OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 02, 2025 OIIA Assessment - July 02, 2025 OIIA Management Response: OIIA Assessment - July 02, 2025 OIIA Management Response: OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 02, 2025 OIIA Graphical Privacy of the providence of the privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PIL and roles and responsibilities for using an				• .	nclude, but not be	limited to, the following:		
* Restrictions on the collection, storage, and use of PII. * Roles and responsibilities for using and protecting PII. * Appropriate disposal of PII. * Appropriate disposal of PII. * Recognition of security or privacy incidents involving PII. * Recognition of security or privacy incidents involving PII. * Recognition of security or privacy incidents involving PII. * Received the privacy incidents involving PII. * Received the provided the provid					d policies			
Roles and responsibilities for using and protecting PII. Appropriate disposal of PII. Recognition of security or privacy incidents involving PII. Retention schedules for PII. Roles and responsibilities in responding to PII-related incidents and reporting Management Response				-	•			
Appropriate disposal of PII. Recognition of security or privacy incidents involving PII. Retention schedules for PII. Rete				_				
Recognition of security or privacy incidents involving PII. Retention schedules for PII. Roles and responsibilities in responding to PII-related incidents and reporting DOT Management Agreements				-				
Roles and responsibilities in responding to PII-related incidents and reporting DoIT Management Agreement: Øl Agree Disagreen Management will convene the team to prepare said documents. The principals will be the Human Resources, IT, and Fina Departments Estimated Timeline to Implement Action Plan: Q1 2022 Status Update-12 months Open Management/Agency Assumes Risk X Partally Complete Complete Pending Verification by OliA OliA Assessment - Juno 18, 2024 Management/Agency Assumes Risk X Partally Complete Complete Pending Verification by OliA Management/Agency Assumes Risk X Partally Complete Complete Pending Verification by OliA Status Update-12 months Management/Agency Assumes Risk X Partally Complete Complete Pending Verification by OliA Closed Management Status Update & OliA Comments Management Status Update & OliA Comments Management Response: Complete Pending Verification by OliA Closed OliA Assessment - Juno 18, 2024 OliA Comments Closed OliA Assessment - July 02, 2025 Management Status Update & OliA Comments Open Management Response: 1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training prerequisites for receiving access to PII, and nogoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Open Management Response: Currently under review with anticipated completion date of Q4 2025 The training is Partally Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities or PII. applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and r					ents involving PII.			
DotT Management Agreement: ☑ Agree ☐ Disagreen Management Will convene the team to prepare said documents. The principals will be the Human Resources, IT, and Fina Departments Estimated Timeline to Implement Action Plan: Q1 2022. ### It developing countywide training that will include the involvement (roles and responsibilities) and policies of response entities (IT, Purchasing, Finance/Risk Management Agreev, Assumes Risk ### Partially Complete Open								
Status Update-12 months Open Status Update-12 months Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Cosed Closed Closed OIIA Assessment - July 02, 2025 Management Risk Update & OIIA Comments OIIA Assessment - July 02, 2025 Management Riskus Update & OIIA Comments OIIA Comments OIIA Comments OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 03, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Comments OIIA Assessment - July 04, 2025 The training plandbook involves HR and other key stakeholders. Anticipated completion date is December in Comments of Commen								
Status Update-12 months Open Status Update-12 months Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Cosed Closed Closed OIIA Assessment - July 02, 2025 Management Risk Update & OIIA Comments OIIA Assessment - July 02, 2025 Management Riskus Update & OIIA Comments OIIA Comments OIIA Comments OIIA Assessment - July 02, 2025 OIIA Comments OIIA Assessment - July 03, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Assessment - July 04, 2025 OIIA Comments OIIA Comments OIIA Assessment - July 04, 2025 The training plandbook involves HR and other key stakeholders. Anticipated completion date is December in Comments of Commen	N	Management Response	DolT Management Agreement: ⊠ Agree □Disagree□					
Status Update-12 months Doen Doen Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed Closed Closed Closed Closed Closed Estimated Timeline to Implement Action Plan: will include the involvement (roles and responsibilities for training and protecting Pll. Updating the NEO training plan in the New Employee Orientation (NEO) handbook and a Pll compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to Pll, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for Pll, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of Pll and roles and responsibilities for Update & OllA Comments Management/Agency Assumes Risk Partially Complete Management Response: Currently under review with anticipated completion date of Q4 2025 Management/Agency Assumes Risk Partially Complete Closed Closed Closed Closed Closed Closed Estimated Timeline to Implement Action plan: Anticipated completion schedules for Pll, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of Pll and roles and responsibilities using and protecting Pll has not been updated.			Management will convene the team to prepare said documents. The principals will be the Human Resources, IT, and Finance					
Status Update-12 months Open Management/Agency. Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Management/Agency Assumes Risk Management/Agency Assumes Risk Management/Agency Assumes Risk Management Response: His has reassessed Pil training needs and modified the approach as follows: HR will continue to provide the following Pil training at New Employee Orientation (NEO) - what is Pil, how it is stored; who needs to know and how to report a breat Employees with Pil access are required to complete confidentiality statements, which cover Pil. Additionally, proper us IT assets is explained. His incorporates Pil in the training for new payroll coordinators and occurs within 5 days of the rol assignment. Pil will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or manot be related to Pil will be self-paced and released May 2024. Closed Close			Departments					
Status Update-12 months Open Management/Agency. Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Closed Management/Agency Assumes Risk Management/Agency Assumes Risk Management/Agency Assumes Risk Management/Agency Assumes Risk Management Response: His has reassessed Pil training needs and modified the approach as follows: HR will continue to provide the following Pil training at New Employee Orientation (NEO) - what is Pil, how it is stored; who needs to know and how to report a breat Employees with Pil access are required to complete confidentiality statements, which cover Pil. Additionally, proper us IT assets is explained. His incorporates Pil in the training for new payroll coordinators and occurs within 5 days of the rol assignment. Pil will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or manot be related to Pil will be self-paced and released May 2024. Closed Close								
Digon Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OIIA Closed OIIA Assessment - Juny 01IA OIIA Comments OIIA Co			Estimated Timeline to Implement Action Plan: Q1 2022					
Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Closed OllA Assessment - June 18, 2024 Management Response: Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA Complete Pending Ve		atus Update-12 months	HR is developing countywide training that will include the involvement (roles and responsibilities) and policies of responding					
Complete Pending Verification by OIIA		A STATE OF THE STA						
Complete Pending Verification by OIIA Closed OIIA Assessment - June 18, 2024 Open Management Response: HR has reassessed PII training needs and modified the approach as follows: HR will continue to provide the following PII training at New Employee Orientation (NEO) - what is PII, how it is stored; who needs to know and how to report a bread Employee Pending Verification by OIIA Closed Management Status Update & OIIA Comments Management (NEO) - what is PII, how it is stored; who needs to know and how to report a bread Employee With PII access are required to complete confidentiality statements, which cover PII. Additionally, proper us IT assets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the roil assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or manot be related to PII will be self-paced and released May 2024. OIIA Comments 1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 2024. OIIA Comments Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA Management Status Update & OIIA Comments Management Plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy received in the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulati								
OliA Assessment - June 18, 2024 Open Management Response: Has reassessed PII training needs and modified the approach as follows: HR will continue to provide the following PII training at New Employee Orientation (NEO) - what is PII, how it is stored; who needs to know and how to report a bread Employees with PII access are required to complete confidentiality statements, which cover PII. Additionally, proper us IT assets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the role assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or monot be related to PII will be self-paced and released May 2024. OliA Comments 1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 2024. OIIA Assessment - July 02, 2025 Management Status Update & OIIA Comments Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OIIA Handsment Status Update & OIIA Comments One Management Response: Currently under review with anticipated completion date of Q4 2025 The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
Management Response:	Closed							
Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OIIA Complete Pending Verification by OIIA Closed Clo	Olia A	ssessment - June 18, 2024	Management Status Update & OIIA Comments					
training at New Employee Orientation (NEO) - what is PII, how it is stored; who needs to know and how to report a bread Employees with PII access are required to complete confidentiality statements, which cover PII. Additionally, proper us IT assets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the role assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or monot be related to PII will be self-paced and released May 2024. OIIA Comments 1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 20024. OIIA Assessment - July 02, 2025 Management Status Update & OIIA Comments Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA OIIA Comments: The friending is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.			HR has reassessed PII training needs and modified the approach as follows: HR will continue to provide the following PII training at New Employee Orientation (NEO) - what is PII, how it is stored; who needs to know and how to report a breach. Employees with PII access are required to complete confidentiality statements, which cover PII. Additionally, proper use of IT assets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the role assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or may					
Complete Pending Verification by OIIA Employees with PII access are required to complete confidentiality statements, which cover PII. Additionally, proper us IT assets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the role assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or monot be related to PII will be self-paced and released May 2024. OIIA Comments 1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 2024. OIIA Assessment - July 02, 2025 Management Status Update & OIIA Comments Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OIIA OIIA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
Tassets is explained. HR incorporates PII in the training for new payroll coordinators and occurs within 5 days of the role assignment. PII will be discussed at the 5/8/24 training for existing payroll coordinators. HIPAA training which may or may not be related to PII will be self-paced and released May 2024. OIIA Comments	· · · · · · · · · · · · · · · · · · ·	<i>'</i>						
Closed Closed	Comple	ete rending verification by OffA						
Closed Closed								
1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OIIA Assessment - July 02, 2025 Management Status Update & OIIA Comments Open Management Response: Currently under review with anticipated completion date of Q4 2025 The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OIIA Assessment - July 02, 2025 Management Status Update & OIIA Comments Open Management Response: Currently under review with anticipated completion date of Q4 2025 The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
Closed policy defines roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training. 2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OliA Assessment - July 02, 2025 Management Status Update & OliA Comments Open			1. DoIT has developed a training plan in the New Employee Orientation (NEO) handbook and a PII compliance policy. The					
2. The training topics in the NEO training handbook do not include retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OliA Assessment - July 02, 2025 Management Status Update & OliA Comments Open Management/Agency Assumes Risk Partially Complete Complete Pending Verification by OliA OliA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for using and protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 2024. OliA Assessment - July 02, 2025 Management Status Update & OliA Comments	Closed							
protecting PII. Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OliA Assessment - July 02, 2025 Management Status Update & OliA Comments Open Management Response: Currently under review with anticipated completion date of Q4 2025 Currently Complete Complete Pending Verification by OliA OliA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
Updating the NEO training handbook involves HR and other key stakeholders. Anticipated completion date is December 3 2024. OllA Assessment - July 02, 2025 Management Status Update & OllA Comments Open Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OllA OllA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.			protecting PII.					
OlIA Assessment - July 02, 2025 Management Status Update & OlIA Comments Open Management Response: Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OlIA OliA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.								
OllA Assessment - July 02, 2025 Management Status Update & OllA Comments Open Management Response: Currently under review with anticipated completion date of Q4 2025 Currently Complete Complete Pending Verification by OllA OllA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.	, ,				5			
Open Management Response: Management/Agency Assumes Risk Currently under review with anticipated completion date of Q4 2025 X Partially Complete Complete Pending Verification by OIIA Complete Pending Verification by OIIA OIIA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.				11 1 1 2 2 2 2 2				
Management/Agency Assumes Risk X Partially Complete Complete Pending Verification by OIIA Closed Currently under review with anticipated completion date of Q4 2025 OIIA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.		ssessment - July 02, 2025	-	•	mments			
X Partially Complete	_							
Closed OIIA Comments: The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.			Currently under review with anticipated completion date of Q4 2025					
The finding is Partially Complete because the NEO training handbook that includes retention schedules for PII, applicable privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.		and a second						
privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities using and protecting PII has not been updated.	Complete Pending Verification by OIIA							
Closed using and protecting PII has not been updated.	Closed		privacy laws, regulations, and policies, restrictions on the collection, storage, and use of PII and roles and responsibilities for					
12/19								