

# Memorandum



**TO:** Lee Garrity, City Manager  
**FROM:** Paul Sherman, Internal Auditor  
**DATE:** November 29, 2022  
**SUBJECT:** Personal Identifying Information (PII) Summary  
**CC:** Patrice Toney, Johnnie Taylor, Ben Rowe, Aaron King, Tom Kureczka, Scott Tesh, Heather Smith

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As the City of Winston-Salem (City) maintains a vast amount of personal identifying information (PII) across several departments and operating areas, Internal Audit (IA) conducted a multi-year data privacy review to assess the differing management and controls by separate data groups: 1) customer data, 2) vendor and contractor data, 3) permit data, 4) grantee and debtor data, 5) risk management data, 6) employee data, and 7) crime and victim data. These reviews evaluated and confirmed whether proper internal control practices were in place as it relates to the various departments/divisions' handling of sensitive PII. Sensitive PII is initially defined as driver's license, social security number (SSN), tax identification number, passport or foreign ID, bank account information, bank card information, PIN, user ID and password, and latent prints (includes fingerprints); moreover, the following PII can also be considered sensitive (medical data, date of birth, or the last four digits of the SSN) when any of these are paired with another identifier.

The purpose of IA's summary was to first evaluate common weaknesses and strengths documented in the Controls over PII Reviews. Then departments and divisions were contacted to ascertain whether control weaknesses were improved upon and control strengths remained in place to mitigate risks surrounding sensitive PII. IA presents these common control weaknesses and strengths and their current status below.

## Common Weaknesses

Regarding the weakness associated with hardcopy documents containing sensitive PII being left in unsecured office areas, 8 out of 11 departments/divisions indicated that this weakness has been corrected; 1 department did not respond to the unsecured office area weakness inquiry.

Regarding the weakness associated with hardcopy documents containing sensitive PII being left in unsecured file cabinets, 6 out of 8 departments/divisions indicated that this weakness has been corrected; 1 department did not respond to the unsecured file cabinets weakness inquiry.



**City Council:** Mayor Allen Joines; Denise D. Adams, Mayor Pro Tempore, North Ward; Barbara Hanes Burke, Northeast Ward; Robert C. Clark, West Ward; John C. Larson, South Ward; Jeff MacIntosh, Northwest Ward; Kevin Mundy, Southwest Ward; Annette Scippio, East Ward; James Taylor, Jr., Southeast Ward; City Manager: Lee D. Garrity

Regarding the weakness associated with hardcopy documents containing sensitive PII being left in unsecured mailboxes, 2 out of 4 departments/divisions indicated that this weakness has been corrected; 1 department did not respond to the unsecured mailboxes weakness inquiry.

Regarding the weakness associated with hardcopy documents containing sensitive PII being left in unsecured employee drawers, 1 out of 2 departments/divisions indicated that this weakness has been corrected.

Regarding the weakness associated with hardcopy documents containing sensitive PII being sent via interoffice mail, 0 out of 4 departments/divisions indicated that this weakness has been corrected; 1 department did not respond to the interoffice mail weakness inquiry.

Regarding the weakness associated with sensitive PII being sent via Outlook emails, 7 out of 11 departments/divisions indicated that this weakness has been corrected; 1 department did not respond to the Outlook email weakness inquiry.

Regarding the weakness associated with sensitive PII being left on employee hard drives, 1 out of 1 department/division indicated that this weakness has been corrected.

### **Common Strengths**

Regarding the strength associated with hardcopy documents containing sensitive PII continuing to remain secure in the office area, 6 out of 7 departments/divisions indicated that this strength remains in place; 1 department did not respond to the secured office area strength inquiry.

Regarding the strength associated with sensitive PII continuing to be securely sent via encrypted email, 3 out of 4 departments/divisions indicated that this strength remains in place; 1 department did not respond to the secured encryption email strength inquiry.

Regarding the strength associated with hardcopy documents containing sensitive PII continuing to be securely kept in file cabinets, 3 out of 4 departments/divisions indicated that this strength remains in place; 1 department did not respond to the secured file cabinets strength inquiry.


Regarding the strength associated with hardcopy documents containing sensitive PII continuing to be in secure mailboxes, 2 out of 3 departments/divisions indicated that this strength remains in place; 1 department did not respond to the secured mailboxes strength inquiry.

Regarding the strength associated with hardcopy documents containing sensitive PII continuing to be securely kept in employee drawers, 2 out of 2 departments/divisions indicated that this strength remains in place.

Regarding the strength associated with hardcopy documents containing sensitive PII continuing to be securely kept in Laserfiche, 1 out of 2 departments/divisions indicated that this strength remains in place; 1 department did not respond to the secured Laserfiche strength inquiry.

Regarding the strength associated with sensitive PII continuing to be securely kept in FMS-AP, 1 out of 1 department/division indicated that this strength remains in place.

Regarding the strength associated with hardcopy documents containing sensitive PII continuing to be securely sent via interoffice mail, 1 out of 1 department/division indicated that this strength remains in place.



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Paul J. Sherman