Fairfax County
Internal Audit Office

Department of Housing and Community Development
Information Protection and Security Audit
Final Report

February 2013

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Executive Summary

The Fairfax County Department of Housing and Community Development (DHCD) manages client records in support of five rental programs, a homeownership program, and an affordable dwelling program. These records are maintained in several locations including the DHCD headquarters on Pender Drive, the DHCD offices in the South County building, and at various other facilities staffed by county employees. The electronic client records are maintained in the YARDI system which was audited in June 2011. This audit focused on the physical client records and adherence to regulations governing their protection and handling.

Over the past couple of years, the DHCD has designed and implemented a training program called PII (Personally Identifiable Information) to educate all staff on the proper handling of confidential and sensitive information. All of the current DHCD staff at the time of the audit had completed this training. The department was in the process of creating a new employee version of the training to be used for new hires. During this audit, the level of knowledge and concern for the protection of client information by all staff was commendable and a testament to the effectiveness of this training program. The use of this program by DHCD made the job of auditing adherence to regulations and the proper handling of client data much easier.

There were no reportable findings noted during our audit. DHCD maintained compliance with HUD and HIPAA regulations. Information obtained from clients was used appropriately and was adequately secured at all times, including when it was transported from one office to another. Documents were transferred to the Fairfax County Archives and Records Management office to be destroyed in a timely manner in accordance with DHCD standards.

Scope and Objectives

This audit was performed as part of our fiscal year 2013 Annual Audit Plan and was conducted in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. This audit covered the period of July 1, 2011, through June 31, 2012, and our audit objectives were to determine that:

- Documents were accessible only by those with a business need
- Information was maintained in compliance with regulations or policy
- System security controls were adequate and operational
- Documents were properly destroyed in a timely manner
- Physical security over documents was sufficient
- Prohibited information was not obtained from clients and retained
- Information obtained from clients was not used in an unauthorized manner

Methodology

Our audit approach included a review of Housing and Urban Development (HUD) and HIPAA regulations applicable to the protection of DHCD data to gain an understanding of their requirements. We interviewed employees from all areas of the DHCD that handle client information to understand the workflow, observed employees' work functions, and performed substantive testwork to determine if the physical data was safe and stored properly in accordance with the applicable regulations. Our audit did not examine the client information maintained online in the YARDI application. That application was audited in June 2011.