



County of Yolo

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HOWARD H. NEWENS, CIA, CPA
Chief Financial Officer

CHAD RINDE, CPA
Assistant Chief Financial Officer

DEPARTMENT OF FINANCIAL SERVICES

625 Court Street, Room 102

PO BOX 1268
WOODLAND, CA 95776
PHONE: (530) 666-8190
FAX: (530) 666-8215
DFS @ yolocounty.org

- Financial Strategy Leadership
- Budget & Financial Planning
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December 21, 2017

Jesse Salinas, Assessor/Clerk-Recorder/Registrar of Voters
625 Court Street, Room B01
Woodland, CA 95695

Re: Social Security Number Truncation Program Review

Dear Mr. Salinas:

We have performed the procedures as agreed upon in our engagement to assist the County with respect to compliance with Government Code Section 27361 (d) (4) for the review of the social security number (SSN) truncation program for the period of December 1, 2013 to September 30, 2017.

The Clerk-Recorder is responsible for compliance with the above noted Government Code section. The agreed upon procedures engagement was performed in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of the specified user of this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

Our procedures and results are as follows:

1. Document the Clerk-Recorder's progress in truncating SSNs on recorded documents.

Results: On July 15, 2008, the Clerk-Recorder entered into a contract agreement with AtPac to perform the truncation of social security numbers for documents recorded between January 1980 and December 2008 and to provide an imaging software server to redact documents going forward. In March 2017, AtPac sold their corporation's assets and assigned all software licenses and service agreements to SouthTech Systems, Inc. (SouthTech).

Day forward redaction (documents recorded after December 2008)

"ID Shield" is the automated redaction server provided by AtPac that redacts documents at the time of recording. The documents recorded are sent through the redaction server to identify social security numbers. The Clerk-Recorder's staff reviews the documents, confirms redaction, and indexes the document to be integrated into the Clerk-Recorder's Imaging Information System (CRiis) to become a public record.

Backfile Redaction (documents recorded between January 1980 and December 2008)

Approximately 1.08 million documents were submitted to AtPac for backfile redaction. The documents were converted to an electronic version and processed through an automatic redaction. AtPac identified 13 document types with a high error rate (approximately 98,000 documents). These documents were submitted to Computing System Innovations (CSI) for a second redaction. Furthermore, the Clerk-Recorder voluntarily entered into a quality control project among staff to help AtPac review 100% of the error type documents to produce a higher level of accuracy. However, the project was suspended by both the Clerk-Recorder and AtPac in late year 2013 without retention of supporting documentation of the results and procedures performed.

As of December 7, 2017, there were 25,867 remaining documents that were not processed by AtPac and that are pending for staff quality control review.

Considerations: The Clerk-Recorder should consider completing the truncation of the documents that were unprocessed by AtPac for the backfile redaction. Quality control review should also be performed and documented to ensure that the redaction has a high rate of accuracy.

2. Verify that the fee collected for the SSN truncation program has been properly accounted for in the Clerk-Recorder's accounting records and deposited properly within the County treasury.

Results: The Clerk-Recorder has an established special revenue fund for the accounting of the truncation program fiscal activity. During the audit period, SSN truncation fees collected were \$139,786 and interest earned totaled \$2,666. The auditors traced the fees collected to the Clerk-Recorder's recording and accounting records. Procedure performed with no exception.

Considerations: None.

3. Select a sample of expenditure transactions during the audit period and determine that expenditures are for the sole purpose of the SSN truncation program.

Results: The auditors reviewed the expenditure transactions recorded for the SSN truncation program during the audit period and noted that the invoices for the redaction server license were approved by staff instead of an authorized official on file with the Department of Financial Services records. In addition, salaries and employee benefits were not properly allocated to the program. The Chief Deputy Clerk-Recorder performed a salary fee study and estimated salaries to be \$61,156 during the 4-year audit period, but only charged the program \$27,500 for fiscal years 2013-14 and 2014-15.

The auditors also performed a review of the payments made to AtPac to determine that the deliverables were received from the contractor as in accordance with the contract provisions. The total amount paid to AtPac for redaction services and licensing from July 1, 2008 to September 30, 2017 was \$187,676 as stated below:

Project Name	Description	Fiscal Years	Total Amount Paid
Backfile Redaction	Redaction of sensitive personal information from Official Records that have been digitized for documents recorded between 1/1/1980 to 12/19/2008	2008-09 and 2009-10	\$97,903
Day Forward Redaction	License of redaction server to automatically redact documents recorded after 12/19/2008	2008-09 to 2017-18 (as of 9/30/2017)	\$89,773
Total			\$187,676

However, services for the backfile redaction were paid in full before the project was completed. In addition, the total image pages that were billed by the vendor did not agree to the Clerk-Recorder records.

Considerations: The Clerk-Recorder should consider reviewing their process over the contract monitoring and payment of invoices to ensure that the deliverables are received from the contractor and an invoice review is properly documented. The Clerk-Recorder should also consider reviewing their records for the total image pages submitted for redaction, confirm the deliverables received and reconcile to the payments made to AtPac. Salaries and employee benefits should also be recorded for the actual time spent on the program.

4. Select a sample of recorded documents that would have had social security numbers and determine if the SSN truncation was performed in accordance with code.

Results: The Clerk-Recorder had 2,277 documents redacted during the audit period from December 2013 to September 2017. The auditors selected 30 documents and traced them to the public access point of the electronic documents and determined that social security numbers contained in the records were truncated as required by law.

The auditors also selected a sample of documents recorded between January 1980 and December 2008 and found that social security numbers had not been truncated. Out of 189 documents reviewed that contained social security numbers, only 73% of the documents were properly truncated, 24% of the documents were not truncated, and 3% were incorrectly truncated. Also, the sample included document types that did not go through the quality control project because AtPac considered them to have a high accuracy rate.

Considerations: The Clerk-Recorder should consider reviewing the documents recorded during the period of January 1980 to December 2008 and continue its efforts to truncate social security numbers included in those documents as required by law. The Clerk-Recorder should also consider reviewing the accuracy of other document types that were not included on the quality control project.

5. Review and document the Clerk-Recorder's estimated ongoing costs for the SSN truncation program to comply with GC27301.

Results: The expenditures related to the SSN truncation program from January 2008 to September 2017 were \$246,080 for redaction services, audit fees, salaries, and software licensing.

On December 12, 2017, the Clerk-Recorder received reauthorization by the Board of Supervisors to continue collecting the additional fee of one dollar (\$1.00) for the first page of every recorded document. The fee is to be used for the implementation of Senate Bill 184 to redact documents prior to January 1, 1980. The estimated ongoing costs of complying with the program is undetermined.

Considerations: None.

We were not engaged to, and did not; conduct an audit, the object of which would be the expression of an opinion on the accounting records. Accordingly, we do not express such as opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is prepared for use by the Assessor/Clerk-Recorder/Registrar of Voters department and management, Department of Financial Services and Yolo County Board of Supervisors. However, it may be distributed to other interested parties.

We appreciate the timely and professional responses provided by the Clerk-Recorder management and staff to our requests for information.

Sincerely,



Mary E. Khoshmashrab, MSBA, CPA
Internal Audit Manager
County of Yolo

cc: Patrick Blacklock, Yolo County Administrator
Howard Newens, CIA, CPA, Yolo County, Chief Financial Officer

Schedule of Prior Report Findings

Summarized below is the current status of all audit findings reported in the Clerk-Recorder Social Security Number Truncation Program Review report dated December 27, 2013:

Finding Title	Finding Description	Status of Corrective Action
Un-truncated social security numbers	Review the documents that have been redacted for the period of January 1, 1980 through December 19, 2008; continue its efforts to truncate social security numbers included in those documents as required by law; and complete the review of the 26,000 documents that are pending in the quality control project.	<p>Not Implemented.</p> <p>According to the Chief Deputy Clerk-Recorder, the backfile redaction was completed sometime in 2014.</p> <p>As of December 7, 2017, there were unprocessed documents for the backfile redaction</p>
Program expenditures	Record salaries and services for the actual time spent on the program; make an adjustment in the general ledger for contracted information technology services recorded under the incorrect fund; and obtain reimbursement from AtPac for the amount paid for sales tax on automatic data processing services.	<p>Not Implemented.</p> <p>The Chief Deputy Clerk-Recorder developed a salary fee study to factor salary expenditures based on the average time spent in the redaction process.</p> <p>The amount charged to the program for salaries and services was based on an estimate instead of the amount calculated on the salary fee study.</p> <p>An adjustment in the general ledger of \$36,363 for program expenditures recorded under the Clerk-Recorder's general fund instead of the SSN truncation fund was not performed.</p> <p>A reimbursement from AtPac for sales tax on automatic data processing services was not obtained.</p>