**AUDIT REPORT TRACKING SYSTEM (ARTS)** 

SECTION I: SUMMARY INFORMATION			
Audit Title:	The City Should Follow Recommended Practices to Protect Personally Identifiable Information	Audit Release Date:	04/26/2015
Department:	City Manager	Last Report Date:	08/23/2017
Department Director:	Troy Schulte	This Report Date:	04/30/2018
Contact Person/Phone:	Kimiko Gilmore/36558	<b>Expected Presentation Date:</b>	06/06/2018
SECTION II: RECORD OF IMPLEMENTED RECOMMENDATIONS			
1. In Progress		3. In Progress	
2. In Progress		4. In Progress	

## **SECTION III: SUMMARY OF IMPLEMENTATION EFFORTS**

Recommendation 1: The city manager should identify all personally identifiable information the city collects and stores and evaluate the confidentiality impact level of the information.

Status of Recommendation In Progress

The City Manager agrees with the recommendation and will ensure that an inventory of all PII is taken by every department. A system will be implemented and the details will be outlined in a new Administrative Regulation which will be issued by the end of the 2<sup>nd</sup> quarter 2017.

UPDATE 04.30.2018: The proposed system has been outlined in a draft Administrative Regulation which is being reviewed by Law.

Recommendation 2: The city manager should periodically review and eliminate the collection of unnecessary personally identifiable information.

Status of Recommendation: In Progress

The City Manager agrees with this recommendation. In the process of identifying PII an analysis will be conducted to determine the relevance of PII. PII that has been determined to be irrelevant to current operations will be eliminated when that determination have been made by the appropriate staff as will be outlined in a new Administrative Regulation which will be issued by the end of the 2nd quarter

UPDATE 04.30.2018: The proposed system has been outlined in a draft Administrative Regulation which is being reviewed by Law.

Recommendation 3: The city manager should develop citywide policies and procedures, including training and other safeguarding controls, for protecting the confidentiality of the personally identifiable information.

Status of Recommendation: In Progress

The City Manager agrees with this recommendation. To address this recommendation a new Administrative Regulation will be issued by the end of the 2nd quarter 2017. The AR will be crafted by City Manager's designee and representatives from Information Technology, Records Management, Finance, City Clerk and Human Resources.

UPDATE 04.30.2018: The proposed system has been outlined in a draft Administrative Regulation which is being reviewed by Law.

Recommendation 4: The city manager should develop a response plan for incidents of misuse, unauthorized disclosure or access, or other breaches of personally identifiable information.

Status of Recommendation: In Progress

The City Manager agrees with this recommendation. Procedures will be addressed in a new Administrative Regulation will be issued by the end of the 2nd quarter 2017.

UPDATE 04.30.2018: The proposed system has been outlined in a draft Administrative Regulation which is being reviewed by Law.

## **SECTION IV: ADDITIONAL OUTCOMES**

The AR implementation was on track for the end of 2nd quarter 2017 however, there was concern expressed by the Law Department regarding the need for an AR regarding PII. Specifically, it was stated that because the City of Kansas City, Missouri must adhere to Sections 610.010 to 610.200 of the Revised Statutes of Missouri, known as The Sunshine Law which *requires transparency and fairness in all aspects of government*, additional protection procedures are not necessary. Thus, the City Manager is awaiting further direction from Law before any actions are taken.