

Post-Audit Review 18-04: Open Data

August 2019

City Auditor

Stan Sewell, CPA, CGFM, CFE

Senior Auditor

Jeff Connor, JD, CFE





OFFICE OF INTERNAL AUDIT

Stan Sewell, City Auditor

August 19, 2019

To: Mayor Andy Berke
City Council Members

Subject: Post-Audit Review of Open Data (Audit Report #18-04)

Dear Mayor Berke and City Council Members:

Attached is a summary report on the status of audit recommendations in our 2018 Open Data audit report. The purpose of this report is to confirm whether, and to what degree, management has implemented the recommendations made in the original audit.

The original audit concluded:

- 1) Some departments have not published priority datasets on the open data portal consistent with Executive Order 2014-04;
- 2) The Office of Performance Management and Open Data does not have a formal written policy to ensure data received from the various departments is accurate and complete;
- 3) Although a variety of tools exist to safeguard sensitive data and personally identifiable information (PII), open data privacy controls do not cover all relevant aspects of a mature disclosure control program.

The audit identified three (3) recommendations to strengthen open data privacy protections and improve the overall efficiency and effectiveness of the program. At the time of this Post-Audit Review, one (1) recommendation was not implemented, and two (2) recommendations were partially implemented. Recommendations not implemented and partially implemented are reported herein to the Audit Committee for follow-up, as appropriate.

Our Post-Audit Review consisted primarily of interviews with City personnel and examination of supporting documentation. The evidence we obtained provided a reasonable basis for our conclusions. However, the issues discussed in this report are not the result of an audit performed in accordance with generally accepted government auditing standards. Had we performed such an audit, additional issues might have been reported.

Sincerely,

Stan Sewell, CPA, CGFM, CFE
City Auditor

Attachment

cc: Audit Committee Members
Stacy Richardson, Chief of Staff
Maura Sullivan, Chief Operating Officer
Tim Moreland, Director, Office of Performance Management and Open Data
Jim Arnette, Tennessee Local Government Audit jim.arnette@cot.tn.gov

RECOMMENDATIONS NOT IMPLEMENTED (1)

Recommendation	Actions Taken
<p>1) We recommended the Office of Performance Management and Open Data continue to work with the city departments to address areas of noncompliance with the Mayor’s Executive Order. We further recommended that the Office of Performance Management and Open Data, in conjunction with open data coordinators from each city department, perform an annual review of the open data inventory to promote the availability of priority datasets and ensure the published datasets and metadata are accurate, reliable, and complete.</p>	<p>The Office of Performance Management and Open Data plans to begin an annual review of the open data inventory in September 2019. Once completed, management will work with city departments to ensure priority datasets are published on the open data portal. Management will also coordinate with the Department of Information and Technology to develop guidelines to promote open data policies in technology-related procurements.</p>

RECOMMENDATIONS PARTIALLY IMPLEMENTED (2)

Recommendation	Actions Taken
<p>2) We recommended the Office of Performance Management and Open Data establish controls to ensure datasets on the open data portal are accurate, reliable and complete. We further recommended that the Office of Performance Management and Open Data develop a comprehensive open data policy and procedures that define the principles governing the program and describe, in precise terms, the expectations and accountabilities for department participation in the program.</p> <p>The policy should require city agencies to collect and create information in a way that supports downstream information processing and dissemination, including machine-readable and open formats, data standards, and common core and extensible metadata for all new information. It should also require city agencies to ensure information stewardship through the use of open licenses and review of information for privacy, confidentiality, security, or other restrictions to release.</p>	<p>A draft open data policy and procedure document is currently under review. The dataset start-time/end-time inconsistencies identified in the audit have been corrected. All other published datasets were analyzed to ensure no date/time recording issues were present. Additionally, the City recently launched a new program, Chattanooga Data Academy, to educate employees on the use of open data tools.</p>

Lastly, the policy should require city agencies to build and modernize information systems in a way that maximizes interoperability and information accessibility, maintains data asset inventories, enhances information safeguards, and clarifies information management.

- 3) We recommended the Office of Performance Management and Open Data consider implementing the following risk mitigation strategies to strengthen existing privacy protections for open data:
 - a) Develop open data procedures for conducting ongoing screening of approved datasets, elevating the review of risky or sensitive datasets, and remove or modify existing datasets that pose an inappropriate risk of re-identification.
 - b) Develop or obtain appropriate tools to de-identify unstructured or dynamic data.
 - c) Continue to deepen workforce privacy training and education efforts.
 - d) Consult statistical disclosure control experts and invest in programmatic tools to evaluate re-identification risks across all datasets.
 - e) Perform annual risk assessments of the content available on the open data portal. The outcome of this review should be shared with the city departments and agencies who will help implement risk mitigation strategies.
 - f) Develop an incident response plan to handle potential privacy breaches or inadvertent disclosures of PII.

The Office of Performance Management and Open Data is currently evaluating the feasibility of implementing risk mitigation strategies recommended in the Audit. However, management advised that resource allocation (staffing and funding) continues to be a major limiting factor.

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