

## MEMORANDUM OF TRANSMITTAL

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**To:** Clyde Boutte, Venues Business Division Manager

**From:** George J. McGowan, CPA  
Director, Office of Audit Services and Management Support

**Date:** July 20, 2020

**Subject:** Follow-up Review of Orlando Venues PCI Compliance (Report No. 20-08)

Attached is a summary of the status of recommendations as determined from our follow-up review of our Orlando Venues PCI Compliance Review (Report No. 19-14), issued June 7, 2019.

This review consisted of inquiries of City personnel and examinations of supporting documentation. It is substantially less in scope than an audit. The evidence obtained provided a reasonable basis for our conclusions; however, had an audit been performed, other matters may have come to our attention that would have been reported to you and our conclusions may have needed to be modified.

We are pleased to report that the two recommendations contained in the original report are either implemented or partially implemented.

We would like to thank the management of the Venues Business Division for their cooperation during this follow-up review.

GJM

### Attachment

**c:** The Honorable Buddy Dyer, Mayor  
Allen Johnson, Chief Venues Officer  
Jody Litchford, Deputy City Attorney  
Chris McCullion, Chief Financial Officer  
Rosa Akhtarkhavari, Chief Information Officer  
David Billingley, Chief Procurement Officer

Venues PCI Compliance Reply and Implementation Summary

	Recommendations	Concur	Action Plan	Original Date	Implementation Status	
					Current Status	
1	We recommend creating an addendum to the existing and/or a new vendor contracts of the requirement that the vendor must comply with PCI applicable requirements by the PCI Security Standards Council. The vendors should agree and accept responsibility to maintaining PCI compliance.	✓	Orlando Venues (OV) will work with the Procurement Department to review and identify existing contracts that could possibly be amended to include PCI requirement language. In addition OV will review with Procurement the addition of recommended PCI language in new vendor contracts.	11/30/2019	Partially Implemented	Four (4) contracts have been identified as vendors that has interactions with the processing of credit card payment data. Food Service Management, Ticketmaster, Orlando Magic, and CenturyLink. The following contract language was included in the recent award of RFP20-0025, Proposal for Food Service Management at the Amway Center and Camping World Stadium after consultation with the Procurement Department and the City Attorney. <b>"Concessionaire must provide complete Payment Card Industry Data Security Standards (PCI) compliance in the handling of all credit/debit card, electronic and on-line transactions and handling of related information. Concessionaire will select and operate only PCI compliant systems, perform PCI compliant best practices and train employees on the proper and consistent handling of customer payment information. Concessionaire must provide evidence of PCI compliance to City and Magic on an annual basis either through self-audit or external audit. Additionally, Concessionaire will participate and comply with annual vulnerability and penetration testing conducted by the City. Any vulnerabilities or failures identified must be addressed in a timely manner, including but not limited to installing applicable security patches, and documentation of such rectification shall be provided to the City and Magic."</b> This contractual language will be tailored for use in all future contracts that include credit card payment processing. At this time we do not feel it is prudent to modify existing contracts. The contractual language will be included at time of renewal or included in the award of new contracts. We will work with the Orlando Magic to include the language in the Ticketmaster contract upon renewal. (the Orlando Magic is responsible for procuring this service under the Events Center Use Agreement) The Orlando Magic's Event Center Use Agreement is a twenty five (25) year contract and we do not anticipate modifying this agreement until a more material need arises. The Centurylink agreement is set to expire in August of 2021 and the language will be included in the next solicitation.
2	We recommend creating a vendor management program that includes vendor PCI compliance. This program will hold the vendors accountable for complying with PCI requirements. Within this program, the city should request and review the AOC from Ticketmaster; the SAQ from OuiVend and Orlando Magic/Levy; and the SOC 1 & 2 from CenturyLink on an annual basis.	✓	Orlando Venues (OV) will utilize Event Booking, a program currently utilized to track event schedules, insurance requirements, contracts and other information as a vendor management tracker for PCI compliance tracking. An account for each vendor will be setup and an individual will be assigned to receive automatic electronic reminders to follow-up on an annual basis to obtain and review the AOC from Ticketmaster; the SAQ from OuiVend and Orlando Magic/Levy; and the SOC 1 & 2 from CenturyLink.	8/1/2019	Implemented	Orlando Venues has created a tracking mechanism within our Event Booking software. This software currently track contractual requirements along with due dates and it sends out email notification/reminders to our Administrative Assistant and to our Business Services Division Manager. An account for each vendor was setup and and Roberta Scott will be assigned to receive automatic electronic reminders to follow-up on an annual basis to obtain and review the AOC from Ticketmaster; the SAQ from OuiVend and Orlando Magic/Levy; and the SOC 1 & 2 from CenturyLink. Upon receipt of documentation it will be review by the Business Services Division Manager for compliance and filed electronically on the shared network drive.