



**COUNTY OF LOS ANGELES
DEPARTMENT OF AUDITOR-CONTROLLER**

**OFFICE OF COUNTY INVESTIGATIONS
KENNETH HAHN HALL OF ADMINISTRATION
500 WEST TEMPLE STREET, ROOM 514
LOS ANGELES, CALIFORNIA 90012-3557**

ARLENE BARRERA
AUDITOR-CONTROLLER

OSCAR VALDEZ
CHIEF DEPUTY AUDITOR-CONTROLLER

ASSISTANT AUDITOR-CONTROLLERS:

**PETER HUGHES
KAREN LOQUET
CONNIE YEE**

September 1, 2021

TO: Bobby D. Cagle, Director
Department of Children and Family Services

FROM: Robert G. Campbell, Chief
Office of County Investigations

SUBJECT: **DEPARTMENT OF CHILDREN AND FAMILY SERVICES –
IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED
REVIEW (REPORT #IOR-2015-10494) - FIRST FOLLOW-UP REVIEW**

We have completed a follow-up review of the Department of Children and Family Services (DCFS or Department) Improvement Opportunities Noted During Limited Review dated March 12, 2019 (Report #IOR-2015-10494). As summarized in Table 1, DCFS has fully implemented two of the three recommendations. Specifically, the Department has implemented the recommendations to enhance their internal controls over conflict of interest guidelines, and security of client data and information. DCFS should fully implement the outstanding recommendation of obtaining telework agreements from employees who telework, in order to strengthen productivity and management controls in this area.

Table 1 - Results of First Follow-up Review

PRIORITY RANKINGS	TOTAL RECOS	RECOMMENDATION IMPLEMENTATION STATUS		
		FULLY IMPLEMENTED	PARTIALLY IMPLEMENTED	NOT IMPLEMENTED
PRIORITY 1	0	0	0	0
PRIORITY 2	3	2	1	0
PRIORITY 3	0	0	0	0
TOTAL	3	0	0	0
			1	

Attachment I provides details of our review and the Department’s corrective actions. We will follow up and report back on the one outstanding Priority 2 recommendation.

Bobby D. Cagle
September 1, 2021
Page 2

We thank DCFS management and staff for their cooperation and assistance during our review. If you have any questions please contact me at (213) 893-0058 or e-mail at rcampbell@auditor.lacounty.gov, or your staff may contact Supervising Investigator Cristina del Rosario at (213) 893-0868 or e-mail at cdelrosario@auditor.lacounty.gov.

AB:RGC:GH:CDR:jh

Attachment

c: Arlene Barrera, Auditor-Controller
Special Audit Committee
Audit Division

LOS ANGELES COUNTY AUDITOR-CONTROLLER

Peter Hughes
ASSISTANT AUDITOR-CONTROLLER

Robert Campbell
DIVISION CHIEF

Office of County Investigations

Report #F1-2015-10494

**DEPARTMENT OF CHILDREN AND FAMILY SERVICES
IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW
#2015-10494 - FIRST FOLLOW-UP REVIEW**

	RECOMMENDATION	A-C COMMENTS
<p>1 Priority 2 – Telework Agreements: Department of Children and Family Services (DCFS or Department) management review existing telework arrangements and ensure that staff who are authorized to telework have approved telework agreements as required by County policy.</p> <p>Original Issue/Impact: DCFS management does not always obtain a Telework Agreement, as required by Board of Supervisors (Board) Policy 9.090, for staff who are authorized to telework on a regular basis. Some of these staff may have unconventional work schedules with a significant amount of autonomy and discretion in planning and performing their work assignments making it difficult to manage their productivity without such an agreement.</p>	<p>Recommendation Status: Partially Implemented</p> <p>The DCFS Teleworker/Telemanager Training Detail Report listing all DCFS teleworkers, as of August 4, 2021, indicates that 94% of DCFS teleworkers completed training and submitted telework agreements. DCFS management indicated that 5% of the teleworkers are scheduled to complete the requirements by August 30, 2021 and the remaining 1% of teleworkers are on a leave of absence. We confirmed that DCFS issued a memo on October 6, 2020 to “All [DCFS] Office Heads” reiterating the County requirement regarding mandatory online telework training and agreements for all DCFS employees who telework.</p>	
<p>2 Priority 2 – Conflict of Interest Guidelines: DCFS management consult with County Counsel about revisions to the Department’s Conflict of Interest Guidelines and Policy to more comprehensively address conflicts of the type noted in our review, including reporting obligations and recusal guidance for clinicians who engage in outside employment where their DCFS duties and responsibilities could intersect with their outside practice or clients of it.</p> <p>Original Issue/Impact: We noted instances where DCFS staff who engage in outside employment as counselors or clinicians have encountered current and/or former clients in the course of their work for DCFS, creating the potential for conflicts of interest in fact and appearance. The circumstances of these encounters were not clearly covered in DCFS’ existing conflict of interest policy. In addition, DCFS staff we spoke with told us they were not clear on where to find the applicable policies.</p>	<p>Recommendation Status: Implemented</p> <p>DCFS revised its Human Resources (HR) Manual Chapter 8.340, to include the following conflicts of interest example:</p> <p>Employees who are engaged in outside employment as a therapist and/or counselor should not have as clients those families or individuals who are supervised by the Department. Where DCFS counselors’ and clinicians’ duties and responsibilities intersect with their outside practice or their clients, DCFS counselors and clinicians must recuse themselves from treating the client/client families and immediately report the contact to the DCFS HR Administrator in writing within 24 hours of such interaction.</p> <p>We confirmed that DCFS notified all employees of the revision to Chapter 8.340 via e-mail dated March 8, 2021 and that DCFS’ intranet website contained the updated HR Manual.</p>	

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency’s operations if corrective action is not taken.

	RECOMMENDATION	A-C COMMENTS
3	<p>Priority 2 – Security of Client Data and Case Information: DCFS management should ensure that staff are aware of and comply with policies on transmitting and safeguarding client and case data, which may include offering and deploying an enterprise mobility security suite to employees who would like to access County e-mails on their personal devices. Additionally, DCFS management should work with County Counsel and the Chief Information Security Officer to safeguard and recover any data transmitted outside the County in violation of the policy, and take appropriate administrative and/or corrective action to address instances of confirmed non-compliance with County Information Technology (IT) security and Departmental policies.</p> <p>Original Issue/Impact: We noted instances where DCFS staff forwarded client and case data to a personal e-mail account, which at a minimum violates the County’s Acceptable Use Agreement signed by employees, Board Policies 6.100 and 6.101, DCFS Management Directive (MD) 11-02, and DCFS Procedural Guide 0600-500.20. The involved staff indicated that they engaged in this conduct for convenience, to avoid carrying two mobile phones, and we noted indications that other DCFS employees may also be engaging in similar practices.</p>	<p>Recommendation Status: Implemented</p> <p>During our initial review, we identified one DCFS employee who routinely forwarded DCFS e-mails outside the County domain. The employee subsequently left County service. DCFS later identified ten additional employees that auto-forwarded their County e-mails to non-County (external) e-mail accounts.</p> <p>DCFS obtained “Employee Attestation of Incident Response & Containment Efforts Regarding County Information Assets¹” forms signed and dated from all 10 current employees attesting that they have discontinued routine forwarding, have permanently deleted all County e-mails and attachments on their non-County e-mail accounts and/or devices, and that their non-County e-mail accounts and/or devices have not been compromised. County Counsel is working to obtain a similar attestation from the remaining former employee.</p> <p>On May 14, 2021, the County subsequently blocked the functionality that allowed DCFS users to auto-forward e-mail messages to external mailboxes.</p> <p>We confirmed that DCFS also implemented five new IT security policies to provide guidance on the proper and secure use of County Information Assets, to train and raise awareness on IT security and privacy measures including transmission of e-mails and disposition of DCFS Information Assets. DCFS posted these policies on DCFS intranet website and notified all DCFS personnel on April 6, 2020 via e-mail, specifically:</p> <ol style="list-style-type: none"> 1) MD 20-01 Use of DCFS Information Assets, 2) MD 20-02 Information Security Awareness Training, 3) MD 20-03 Information Security Incident Reporting and Response, 4) MD 20-04 Secure Disposition of Computing Devices, and 5) MD 20-05 Proper Use and Secure Transmission of E-mails.

¹ Board Policy No. 6.100 defines Information Assets as digital Information and any item that processes, stores or transmits digital information and supporting infrastructure that is owned, leased, managed, operated, or maintained by, or in the custody of, the County or non-County entities and used for County purposes.

Priority Ranking: Recommendations are ranked from Priority 1 to 3 based on the potential seriousness and likelihood of negative impact on the Agency’s operations if corrective action is not taken.

We conducted our review in conformance with the International Standards for the Professional Practice of Internal Auditing. For more information on our auditing process, including recommendation priority rankings, the follow-up process, and management's responsibility for internal controls, visit auditor.lacounty.gov/audit-process-information.