



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

OFFICE OF COUNTY INVESTIGATIONS
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February 28, 2023

TO: Lillian Russell, Chief Privacy Officer
Office of Privacy

FROM: Greg Hellmold, Chief 
Office of County Investigations

SUBJECT: **IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED
REVIEW #2021-18242**

NUMBER OF RECOMMENDATIONS
PRIORITY 1 1 CORRECTIVE ACTION REQUIRED WITHIN 90 DAYS
PRIORITY 2 0 CORRECTIVE ACTION REQUIRED WITHIN 120 DAYS
PRIORITY 3 0 CORRECTIVE ACTION REQUIRED WITHIN 180 DAYS

During a limited review at the Department of Health Services (DHS or Department), we noted an area where County departments can strengthen controls over the collection of Personally Identifiable Information from employees and clients. Please see Attachment I, Table of Findings and Recommendations for Corrective Action, for details of our observations and recommendation.

Review of Report

We discussed our report with management from the Office of Privacy. The Office of Privacy's response (Attachment II) indicates general agreement with our finding and recommendation.

We thank DHS and Office of Privacy management and staff for their cooperation and assistance during our review. If you have any questions, please contact me at (213) 893-0243 or ghellmold@auditor.lacounty.gov, or your staff may contact Kenneth Diaz, Supervising Investigator, at (213) 948-2936 or kdiaz@auditor.lacounty.gov.

GH:SL:kd
Attachments

c: Arlene Barrera, Auditor-Controller
Christina R. Ghaly, M.D., Director, Department of Health Services
Peter Loo, Acting Chief Information Officer
Audit Committee
Audit Division

REPORT #IOR-2021-18242

LOS ANGELES COUNTY AUDITOR-CONTROLLER

Attachment I
Page 1 of 1

Robert G. Campbell
ASSISTANT AUDITOR-CONTROLLER

Greg Hellmold
DIVISION CHIEF

OFFICE OF COUNTY INVESTIGATIONS

Report #IOR-2021-18242

OFFICE OF PRIVACY IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW #2021-18242

BACKGROUND

County departments conduct frequent and routine business with employees, vendors, and members of the public requiring the exchange of sensitive information. The Board of Supervisors (Board) established the Office of Privacy and the Countywide Privacy Program to develop and implement organizational policies and outline procedures in the Countywide Privacy Manual to ensure the protection of information received and/or possessed by the County, including Personally Identifiable Information (PII). PII includes information that identifies, relates to, describes, is reasonably capable of being associated with, or could reasonably be linked, directly or indirectly, with a particular individual. All County departments are required to comply with the Countywide Privacy Program, the Countywide Privacy Manual, and all associated policies and procedures established by the Office of Privacy.

TABLE OF FINDINGS AND RECOMMENDATIONS FOR CORRECTIVE ACTION

ISSUE	RECOMMENDATION
<p>1 Data Security in Routine Business Practices – During a recent identity theft investigation at the Department of Health Services (DHS), we noted that DHS staff routinely requested newly hired employees send their PII (i.e., images of Social Security cards, driver licenses and passports) via e-mail as part of the onboarding process. While our investigation found no evidence that DHS employees were involved in the identity theft case, and the requests to e-mail PII were a temporary measure in response to the COVID-19 pandemic, we learned that several other departments also request the transmission of PII via e-mail from internal and external customers during various routine business processes.</p> <p>Routinely transmitting sensitive data via e-mail is not a recommended business practice. If e-mail account passwords are compromised, unauthorized parties may be able to access all PII stored in e-mail accounts, including encrypted messages.</p> <p>Although there are several County policies requiring employees to safeguard electronic communications and stored information, they do not specifically address the risks associated with routine business processes that involve requesting and/or transmitting sensitive information via e-mail.</p> <p>Impact: Routinely e-mailing documents containing PII increases the risk that sensitive information may be compromised during a security incident or breach, exposing the County to potential liability.</p>	<p>Priority 1 – Office of Privacy:</p> <ul style="list-style-type: none"> a. Develop and implement strategies to minimize the use of e-mail by County workforce members to solicit, receive, send, and store sensitive and/or regulated data (e.g., PII and Protected Health Information) during routine County business processes, particularly with parties outside the County. b. Ensure that Office of Privacy training includes content to educate County workforce members about the risks of using e-mail to solicit, receive, send, and store sensitive and/or regulated data. <p>Department Response: Agree Implementation Date: Ongoing</p>

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.

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.

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COUNTY OF LOS ANGELES

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ASSISTANT CHIEF EXECUTIVE OFFICER

Steven T. Robles

January 17, 2023

To: Greg Hellmold, Chief
Office of County Investigations

From: Lillian Russell, Chief Privacy Officer
Office of Privacy

Lillian L.
Russell

Digitally signed by Lillian
L. Russell
Date: 2023.01.25
09:40:14 -08'00'

**RESPONSE TO AUDITOR-CONTROLLER'S FINDINGS AND RECOMMENDED
CORRECTIVE ACTIONS – REPORT NO. 2021-18242**

The Office of Privacy has reviewed the Auditor-Controller's report and agrees with the finding and recommendation. Attached is the Office of Privacy's plan of corrective action.

If you have any questions, please contact me at (213) 351-5363 or LRussell@ceo.lacounty.gov.

STR:LR:sg

Attachment

I:\RMB Secs\Office of Privacy\M to Greg Hellmold (OCI) re Response to A-C Findings 1-17-23.docx



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**OFFICE OF PRIVACY
IMPROVEMENT OPPORTUNITIES NOTED DURING LIMITED REVIEW NO. 2021-18242
DEPARTMENT ACTION PLAN/RESPONSE**

ISSUE 1: DATA SECURITY IN ROUTINE BUSINESS PRACTICES

A/C Recommendation	<p>Office of Privacy:</p> <p>A. Develop and implement strategies to minimize the use of email by County workforce members to solicit, receive, send, and store sensitive and/or regulated data (e.g., PII and Protected Health Information) during routine business processes, particularly with parties outside the County.</p> <p>B. Ensure that Office of Privacy training includes content to educate County workforce members about the risks of using email to solicit, receive, send, and store sensitive and/or regulated data.</p>
Priority	PRIORITY 1
Agree/Disagree	Agree [Agree, Partially Agree, or Disagree]
Department Action Plan¹	We will continue to develop and implement Countywide policies, strategies, and guidance in accordance with Board of Supervisors' Policy Chapter 10, along with the annual deployment of Mandatory Privacy Awareness training (and HIPAA training, if applicable), and monitor Countywide completion of such training by all workforce members that directly or indirectly access County information, including personally identifiable information (PII).
Planned Implementation Date	Ongoing
Additional Information (optional)²	

¹ In this section the Department should only describe the efforts they plan to take to implement the recommendation. The Department should include any other information in the Additional Information section that follows.

² In this section the Department can provide any background or clarifying information they believe is necessary.