



**BOARD OF COUNTY COMMISSIONERS
OFFICE OF THE COMMISSION AUDITOR**

M E M O R A N D U M

TO: Lucia Davis-Raiford, Executive Director,
Community Action and Human Services Department

FROM: Neil R. Singh, CPA
Acting Commission Auditor 

DATE: October 18, 2016

SUBJECT: **Closure** of the Audit of Internal Controls for the Protection of Electronically Stored Personal and Health Information – *Former Department of Human Services*

The Audit of Internal Controls for the Protection of Electronically Stored Personal and Health Information – Former Department of Human Services (*now part of Community Action and Human Services Department (CAHSD)*) final report was issued on October 11, 2012. On May 5, 2015, the Office of the Commission Auditor (OCA) issued a Follow-up report, which summarized the OCA's assessment of the implementation status of recommendations contained in the original audit report as follows: Five findings in the original report had been fully resolved, and three were partially resolved.

In the Follow-up report, OCA requested the management of CAHSD to report, within 90 days, subsequent actions taken by management to implement the recommendations on audit findings that were still pending. We have received and reviewed the requested management report (*attached*) of subsequent actions. Although we are concerned with the slow speed at which the recommended upgrade and enhancements are being implemented, we are satisfied that the enhancements, when fully implemented, would resolve the pending issues. We would like to re-emphasize management's responsibility in ensuring that all internal control weaknesses identified in the audit report are adequately resolved. This audit is now closed.

We thank the staff of the CAHSD and the Information Technology Department for their cooperation and input throughout the audit lifecycle.

Should you have any questions, please contact me at (305) 375-4354.

Attachment

c: Honorable Chairman Jean Monestime,
and Members, Board of County Commissioners
Mayor Carlos Gimenez, County Mayor
Russell Benford, Deputy Mayor, Office of the Mayor
Abigail Prince-Williams, County Attorney
Mary T. Cagle, Inspector General
Cathy Jackson, Director, Audit and Management Services
Angel Petisco, Chief Information Officer/Director, Information Technology Department
Lars Schmekel, Chief Security Officer, Information Technology Department
Marie Woodson, Assistant Director, CAHSD
Louis Foster, Acting Assistant Director, CAHSD

Memorandum

MIAMI-DADE
COUNTY

Date: October 11 , 2016

To: Neil Singh, C.P.A., Acting Director
Office of the Commission Auditor

Office of the
Commission Auditor

OCT 14 2016

From: Lucia Davis-Raiford, Director
Community Action and Human Services Department

Subject: Response to Audit of Internal Controls for the Protection of Electronically Stored
Personal and Health Information -- Former Department of Human Services - Follow
Up - Project No. 11-143370

The following represents the Community Action and Human Services Department's (CAHSD) response to the implementation status of the audit recommendations contained in the Office of the Commission Auditor's (OCA) follow-up audit report conducted on the former Department of Human Services Internal Controls for the Protection of Electronically stored personal and health information.

Finding 1: Department uses WLAN implemented with poor security features that can easily compromise confidential and sensitive information.

Recommendations:

- a) ITD should upgrade WLAN to one based on security standards with robust security features (e.g. Wi-Fi Protected Access II (WPA2)).
- b) ITD should establish effective risk assessment and control processes to continuously manage the risks of wireless network.

CAHSD Response: Throughout fiscal years 14-15 and 15-16, ITD conducted various assessments and implemented improvements to upgrade network infrastructure across the County. Community Action and Human Services Department (CAHSD) was identified to require upgrades in 35 sites throughout their facilities across the community. A modernization plan for WAN, Wi-Fi, VoIP is underway with up to 12 sites estimated to be completed in FY 15-16.

The specific CAHSD site in question for the purpose of this audit has been upgraded and no further issues should arise. The remaining sites are scheduled for completion during FY 16-17. Upon completion of this work, any security concerns in all CAHSD sites will have been addressed.

Finding 5: Processes for fixing software defects and managing computers security settings failed to provide effective remediation of flaws and vulnerabilities in computer systems.

Recommendations:

- a) ITD should review flaw remediation and system configuration management processes and implement needed enhancements that will assure effective remediation of systems flaws.
- b) ITD should develop system configuration standard that ensures all systems security settings conform to best practices that mitigate possible risks.

CAHSD Response: During FY 15-16, ITD developed a plan to simultaneously implement Virtual Desktop Services to CAHSD sites as network modernization is implemented. The thin client virtual machines will have baseline security controls in place and will undergo weekly reboots with upgrades and patches to minimize software defects and update security settings as needed. Upon completion of this deployment of virtual services, CAHSD will have a modernized and secure environment. Completion of this is dependent on the successful modernization of network infrastructure. By close of FY 15-16 an estimated 160 virtual desktops will be installed with the remainder in the following fiscal year. The recommendations provided by the Commission Auditor have been implemented.

Finding 6: There was no policy for secure use of removable storage media, and no documentations to provide evidence of secure sanitization or destruction of old electronic storage media.

Recommendation:

CAHSD and the Internal Service Department (ISD), in conjunction with ITD, should establish a written policy and also guidelines for secure use, sanitization, reuse and destruction of storage media (hard disk and removable media), and documentation requirements to evidence sanitization and destruction actions.

CAHSD Response: CASHD has since developed written procedures governing the use, reuse and disposal of electronic media consistent with Miami-Dade County policy. These procedures are consistent with the County's Information Security Policy <http://intra.miamidade.gov/technology/library/guidelines/security-policy-manual.pdf> and includes the documentation requirements to evidence sanitization and destruction action.