



Office of Independent Internal Audit

LAVOIS CAMPBELL, CHIEF AUDIT EXECUTIVE

FINAL

December 08, 2022

Zachary Williams L, Chief Operating Officer
Chief Executive Office, DeKalb County
1300 Commerce Drive
Decatur Georgia, 30030

RE: Status of Management Action Plans – Management of Personally Identifiable Information (PII) - Audit Report No. 2019-009-IT

Dear Mr. Williams

As required by DeKalb County, Georgia – Code of Ordinances/Organizational Act Section 10A-Independent Internal Audit (I), I have attached the Office of Independent Internal Audit’s report on the status of management actions taken to address the findings contained in the referenced audit report. The conclusions in this follow-up report are limited to the status of the implementation and not the effectiveness of the any completed action plans, which may be assessed in a future audit.

Management is continuing to work through completing the corrective action plans. The expectation is that they will all be completed by the end of the first quarter of 2023. We will follow up after that date to verify the completion of the action plan(s).

Finding No.	Report Finding	Status of Management Action Plans
1	The County Has Not Designated A Process Owner to Manage PII.	Complete
2	There Were No Documented Policies and Procedures For The Management And Protection Of PII.	Partially Complete
3	The County Did Not Have an Awareness and Training Program For PII.	Partially Complete
4	The County Did Not Have an Incident Response Process in Place For PII	Complete
5	There Were No Guidelines in Place for Managing PII With Third-Party Service Providers.	Complete

Please contact me if you require additional information.

Sincerely,

Lavois Campbell, CIA, CISA, CFE, CGA-CPA

Chief Audit Executive



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- cc. Michael L. Thurmond, Chief Executive Officer
- Robert Patrick, Board of Commissioners District 1
- Jeff Rader, Board of Commissioners District 2
- Larry Johnson, Board of Commissioners District 3
- Steve Bradshaw, Board of Commissioners District 4
- Mereda Davis Johnson, Board of Commissioners District 5
- Ted Terry, Board of Commissioners District 6
- Lorraine Cochran-Johnson, Board of Commissioners District 7
- Adrienne T. McMillion, Chairperson, Audit Oversight Committee
- Harold Smith, Jr., Vice-Chairperson, Audit Oversight Committee
- Gloria G. Gray, Audit Oversight Committee
- Lisa Earls, Chairperson pro-tem, Audit Oversight Committee
- Tanja Christine Boyd-Witherspoon, Audit Oversight Committee
- La'Keitha D. Carlos, CEO's Chief of Staff
- Kwasi K. Obeng, Chief of Staff, Board of Commissioners
- John Matelski, CIO, Director of Innovation & Information
- Michelle Butler, Chief Procurement Officer (Interim)



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Dekalb County Government			
Office of Independent Internal Audit			
Date: December 07, 2022		Prepared by: Julie Ikioda	
Audit Findings Status Update Form			
Status Date	Report #	Report Title	
12/07/22	2019-009-IT	Audit of Management of Personally Identifiable Information (PII)	
Contact Person	Title	Phone No.	Email Address
Zach Williams	Chief Operating Officer	(404) 371-2174	zwilliams@dekalbcountyga.gov
Activity	Accountability	Schedule	
Follow-up	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Roles and Responsibilities	N/A	N/A
Finding		Finding Detail	
No.	1		
Date	8/1/21		
Finding		The County Has Not Designated A Process Owner to Manage PII.	
Recommendations	We recommend that management assign an appropriate individual to be responsible for the management of all PII, the development of PII policies and procedures including procedures for handling incidents and breaches, implementation of PII training and awareness processes, and the development of monitoring procedures to help ensure compliance.		
Management's Response	DoIT Management Agreement: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree Management agreed with the finding and will make the COO to assume this function. Estimated Timeline to Implement Action Plan: Immediately		
Status Update-12 months	The Chief Operating Officer/Executive Assistant has oversight on this process but will rely on the Chief Innovation & Information Officer/Director of IT to ensure PII policies for electronic data including procedures for handling associated data incidents and/or breaches are updated, current and complied with. The Director of Human Resources will ensure that PII training and awareness processes are in place and monitor procedures to help ensure compliance. The Deputy Director of Finance & Risk management will ensure policies and procedures are in place for PII in paper form, including covered documents that are in County archives/storage.		
<input type="checkbox"/> Open <input type="checkbox"/> Management/Agency Assumes Risk <input type="checkbox"/> Partially Complete <input type="checkbox"/> Complete Pending Verification by OIIA <input checked="" type="checkbox"/> Complete			

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Zach Williams	Chief Operating Officer	(404) 371-2174	zwilliams@dekalbcountyga.gov
Activity	Accountability	Schedule	
Follow up	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Policies and Procedures	N/A	Q1 2023
Finding		Finding Detail	
No.	2		
Date	8/1/21		
Finding		There Were No Documented Policies And Procedures For The Management And Protection Of PII.	
Recommendations		<p>We recommend that management develop, implement, and publish comprehensive County-wide PII policies and procedures. The policies and procedures should include, but not be limited to, the following topics:</p> <ul style="list-style-type: none"> • Definition of PII. • Inventory of PII collected by the County. • Classification of PII. • Access rules for PII, especially electronic PII. • PII retention and disposal schedules and procedures. • Limitations on the collection, disclosure, maintenance, sharing, and use of PII. • Roles and responsibilities for collecting, processing, and protecting PII. • Masking sensitive PII in County applications. 	
Management's Response		<p>DoIT Management Agreement: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree</p> <p>Management agrees that policies and procedures need to be reviewed and enhanced. Having said that, there are policies and procedures under the auspices of DoIT that do govern electronic PII. DoIT abides by the National Institute of Standards and Technology Special Publication 800-122 Guide to Protecting the Confidentiality of Personally Identifiable Information (PII) https://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-122.pdf. There is also a DeKalb Cyber Incident Response procedure document that governs how the County responds to cyber-related incidents, which would include any compromise associated with PII data.</p> <p>Over the next 6 months, management will work on the coordinated enhancement of the governing documents and guidelines and create DeKalb County-specific PII references in policies and or create new ones as needed.</p> <p>Estimated Timeline to Implement Action Plan: Year-end 2021</p>	
Status Update-12 months		DoIT policies which have over-reaching application to the entire DeKalb County government enterprise have been revised to specifically call out PII and shall be the basis by which other policies conform to. HR is working to complete its PII policy for HR related information by the middle of November. DoIT anticipates that the action plan will be completed by 3/31/2023.	
<input type="checkbox"/>	Open		
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input checked="" type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIA		
<input type="checkbox"/>	Complete		

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Zach Williams	Chief Operating Officer	(404) 371-2174	zwilliams@dekalbcountyga.gov
Activity	Accountability	Schedule	
Follow up	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Awareness and Training	N/A	Q1 2023
Finding		Finding Detail	
No.	3		
Date	8/1/21		
Finding		The County Did Not Have an Awareness And Training Program For PII.	
Recommendations		<p>We recommend that management:</p> <ul style="list-style-type: none"> • Develop a training plan and implementation approach. • Define roles and responsibilities for training, prerequisites for receiving access to PII, and ongoing training requirements. <p>Further, we recommend training topics include, but not be limited to, the following:</p> <ul style="list-style-type: none"> • The definition of PII. • Applicable privacy laws, regulations, and policies. • Restrictions on the collection, storage, and use of PII. • Roles and responsibilities for using and protecting PII. • Appropriate disposal of PII. • Recognition of security or privacy incidents involving PII. • Retention schedules for PII. • Roles and responsibilities in responding to PII-related incidents and reporting 	
Management's Response		<p>DoIT Management Agreement: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree</p> <p>Management will convene the team to prepare said documents. The principals will be the Human Resources, IT, and Finance Departments</p> <p>Estimated Timeline to Implement Action Plan: Q1 2022</p>	
Status Update-12 months		<p>HR is developing countywide training that will include the involvement (roles and responsibilities) and policies of responding entities (IT, Purchasing, Finance/Risk Management and HR). Training will be conducted when all parties establish their policies. DoIT anticipates that the action plan will be completed by 3/31/2023.</p>	
<input type="checkbox"/>	Open		
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input checked="" type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIIA		
<input type="checkbox"/>	Complete		

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Zach Williams	Chief Operating Officer	(404) 371-2174	zwilliams@dekalbcountyga.gov
Activity	Accountability	Schedule	
Follow up	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Incidence Response Plan	N/A	N/A
Finding		Finding Detail	
No.	4		
Date	8/1/21		
Finding	The County Did Not Have an Incident Response Process In Place For PII.		
Recommendations	<p>We recommend that management develop an incident response plan for handling incidents and breaches involving PII. The plan should include, but not be limited to, the following:</p> <ol style="list-style-type: none"> 1. Instructions on how a breach should be reported, including when and how relevant individuals should be notified. 2. Remedial services to be provided, such as credit monitoring, to affected individuals. 3. Roles and responsibilities of staff to help ensure timely and effective handling of incidents and breaches. 		
Management's Response	<p>DoIT Management Agreement: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree</p> <p>Though it is true that there is no incident response process in place for PII, DoIT has had a DeKalb Cyber Incident Response Team (DCIRT) procedure and team in place since 2015, that would coordinate incident response for any cyber compromise.</p> <p>Over the next 6 months, management will work on the coordinated enhancement of this document and process to specifically address a PII incident and determine whether revisions are required if a PII incident were to occur through non-electronic means.</p> <p>Estimated Timeline to Implement Action Plan: June 30, 2022</p>		
Status Update-12 months	DeKalb County DoIT has updated its DCIRT Policy to specifically use the term PII. Reporting, processes, roles and responsibilities were already identified in the DCIRT policy.		
<input type="checkbox"/> Open			
<input type="checkbox"/> Management/Agency Assumes Risk			
<input type="checkbox"/> Partially Complete			
<input type="checkbox"/> Complete Pending Verification by OIIA			
<input checked="" type="checkbox"/> Complete			

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Contact Person	Title	Phone No.	Email Address
Zach Williams	Chief Operating Officer	(404) 371-2174	zlwiliams@dekalbcountyga.gov
Activity	Accountability	Schedule	
Follow up	Responsible Area	Repeat Finding	Anticipated Completion Date/Date Adjustments will be made
	Third-Party Management	N/A	N/A
Finding		Finding Detail	
No.	5		
Date	8/1/21		
Finding		There Were No Guidelines in Place For Managing PII With Third-Party Service Providers.	
Recommendations		<p>We recommend that management:</p> <ul style="list-style-type: none"> • Develop and implement standards for managing third-party PII. These standards should document the County's expectations for vendors, regarding the security of PII. • Require as a part of each contract an independent third-party service provider audit report for all vendors handling PII. • Develop procedures to continuously monitor all third-party vendors for security issues in the absence of an independent third-party service provider audit report. 	
Management's Response		<p>DoIT Management Agreement: <input checked="" type="checkbox"/> Agree <input type="checkbox"/> Disagree</p> <p>As third-party contracts are developed for DoIT related acquisitions or services, all of them have contract clauses that address compliance including PII. These contractual commitments generally mandate compliance with NIST guidelines Special Publication 800-122.</p> <p>Management will work to identify standards and develop or tweak appropriate procedures over the next 6 months.</p>	
Status Update-12 months		DeKalb County continues to use NIST and Department of Homeland Security guidelines related to how it governs PII. We have also developed a policy for internal use as well as contractors, that governs this activity.	
<input type="checkbox"/>	Open		
<input type="checkbox"/>	Management/Agency Assumes Risk		
<input type="checkbox"/>	Partially Complete		
<input type="checkbox"/>	Complete Pending Verification by OIA		
<input checked="" type="checkbox"/>	Complete		