

OFFICE OF AUDITS & ADVISORY SERVICES



GOVERNMENT WITHOUT WALLS PROGRAM AUDIT

FINAL REPORT

Chief of Audits: [Juan R. Perez](#)
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County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

March 27, 2023

TO: Tracy Drager
Auditor and Controller

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: GOVERNMENT WITHOUT WALLS (GWOW) PROGRAM AUDIT

Enclosed is our report on the GWOW Program Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

The actions taken and/or planned, in general, are responsive to the recommendations in the report. As required under Board of Supervisors Policy B-44, we respectfully request that you provide quarterly status reports on the implementation progress of the recommendations. You or your designee will receive email notifications when these quarterly updates are due, and these notifications will continue until all actions have been implemented.

If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

AUD:WA:nb

Enclosure

c: Ebony N. Shelton, Deputy Chief Administrative Officer/Chief Financial Officer
Judy Ying, Group Finance Director, Finance and General Government Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

March 27, 2023

TO: Derek Gade, Interim Director
Department of Public Works

FROM: Juan R. Perez
Chief of Audits

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JUAN R. PEREZ
Chief of Audits

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Enclosure

- c: Sarah Aghassi, Deputy Chief Administrative Officer, Land Use and Environment Group
Tracy Drager, Auditor and Controller
Jennifer Lawson, Chief Operations Officer, Land Use and Environment Group
Aimee Leighton, Interim Group Finance Director, Land Use and Environment Group



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JUAN R. PEREZ
CHIEF OF AUDITS

March 27, 2023

TO: Jeffrey Grissom, Director
Child Support Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: GOVERNMENT WITHOUT WALLS (GWOW) PROGRAM AUDIT

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

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Enclosure

- c: Holly Porter, Deputy Chief Administrative Officer, Public Safety Group
Tracy Drager, Auditor and Controller
Rosemarie Degracia, Group Finance Director, Public Safety Group



County of San Diego

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JUAN R. PEREZ
CHIEF OF AUDITS

March 27, 2023

TO: Rick Wanne, Director
Self-Sufficiency Services

FROM: Juan R. Perez
Chief of Audits

FINAL REPORT: GOVERNMENT WITHOUT WALLS (GWOW) PROGRAM AUDIT

Enclosed is our report on the GWOW Program Audit. We have reviewed your response to our recommendations and have attached it to the audit report.

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If you have any questions, please contact me at (858) 495-5661.

JUAN R. PEREZ
Chief of Audits

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Enclosure

- c: Patricia K. Danon, Chief Operations Officer, Health and Human Services Agency
Tracy Drager, Auditor and Controller
Amy Thompson, Executive Finance Director, Health and Human Services Agency
Christy Carlson, Group Program Manager, Health and Human Services Agency

INTRODUCTION

Audit Objective The Office of Audits & Advisory Services (OAAS) completed an audit of the Government Without Walls (GWOW) Telework Program. The objective of the audit was to assess adequacy and effectiveness of management controls in place to monitor productivity and compliance with information security protocols by telecommuting workforce.

Background Teleworking is defined as work arrangements in which an employee performs officially assigned duties at home, or at other worksites, while utilizing various forms of telecommunications technology for a significant portion of their work. This can include communication with managers, colleagues, and the public.

The County of San Diego (County) Board of Supervisors (BOS) Policy C-26 was established to allow flexibility in employee work schedules and locations while reducing costs, maintaining or enhancing County service and productivity levels, and reducing the County's carbon footprint. According to Policy C-26, teleworking programs may be implemented in County departments, where appropriate, as defined by the criteria established by the Department of Human Resources (DHR). County employees shall participate in the teleworking programs on a voluntary basis and shall comply with all County and Department policies, ordinances, practices, and instructions. Additionally, productivity must be maintained by the teleworker. Evaluation shall be conducted using methods of productivity measurements as defined in the administrative procedures.

DHR established Policy 108 to communicate the administrative process for implementing BOS Policy C-26 concerning teleworking. According to Policy 108, an appointing authority may request approval from the Chief Administrator Officer (CAO) to implement a teleworking program by submitting a plan to their Group General Manager, who will review and make a recommendation to the CAO. The plan should address all the points enumerated in the Criteria for Implementing Teleworking.

Program information and forms were developed to assist departments with implementing the GWOW Telework Program, and were made accessible via the County intranet.

Data Loss Prevention

To ensure compliance with County policies regarding data protection practices, the County established the Data Loss Prevention (DLP) initiative and developed procedures to safeguard personal information. As part of this initiative, the County uses the Forcepoint Software Platform, an automated tool to prevent the inadvertent disclosure of Personal Identifiable Information and Protected Health Information. The DLP initiative extends visibility and control over where confidential data

is allowed to migrate. It also monitors the source and destination of the data, providing functionality to prevent loss of this data.

Departments are responsible for taking any required actions to resolve true positive incidents based upon each of their own identified internal policies. The actions required for each incident will be determined within each department's existing guidelines and policies based upon the type of offending content or situation.

COVID-19 Pandemic

In response to the public health orders and directives issued by the San Diego County Public Health Officer due to the COVID-19 pandemic, County departments had to quickly mobilize employees to work remotely, except for those who were required to work in the field or at a County facility as an essential worker.

The transition to teleworking required significant planning and coordination, to ensure that employees were able to continue performing their essential duties while maintaining public health and safety. Departments were required to rapidly implement GWOW policies and procedures, including provisions for accessing secure County systems, managing remote work schedules, and ensuring employee productivity and accountability. Departments were also tasked to provide employees with equipment such as laptops, monitors, and other necessary tools to enable teleworking on short notice.

Audit Scope & Limitations

The scope of the audit included an evaluation of management controls over the GWOW Telework Program during FY 2021-22, including implementation of the DLP initiative. OAAS selected the following departments to evaluate established internal controls and compliance with program requirements:

Table 1: Departments Selected for Testing

Business Group	Department
Finance & General Government Group	Auditor & Controller (A&C)
Health & Human Services Agency (HHSA)	Regional Self Sufficiency Services (SSS)
Land Use & Environment Group	Department of Public Works (DPW)
Public Safety Group	Department of Child Support Services (DCSS)

This audit was conducted in conformance with the International Standards for the Professional Practice of Internal Auditing prescribed by the Institute of Internal Auditors as required by California Government Code, Section 1236.

Methodology

OAAS performed the audit using the following methods:

- Reviewed County telework policies and procedures:
 - BOS Policy C-26 (Teleworking)
 - Department of Human Resources Policy 108 (Teleworking)
- Reviewed County telework guidance and forms:
 - Managers and Employee Teleworking and Alternate Work Schedule Guidance
 - Employee/Manager Telework Assignment Agreement
 - Employee Weekly Report
 - Home Office Safety Annual Renewal Form
 - Computer Virus Protection and Software Compliance Form
 - Equipment Assignment Form
 - Home Office Recommended Safety Checklist
- Reviewed best practices related to teleworking:
 - Federal Telework: Key Practices That Can Help Ensure the Success of Telework Programs
 - NIST Special Publication 800-46 Revision 2: Guide to Enterprise Telework, Remote Access, and Bring Your Own Device Security
- Interviewed assigned Teleworking Coordinators and DLP Coordinators to gain an understanding of department implementation of the GWOW Telework Program and DLP initiative, with emphasis on efforts to monitor productivity and ensuring compliance with information security protocols.
- Reviewed department teleworking plans and attachments.
- Reviewed and assessed department telework training and guidance.
- Examined applicable County policies and procedures related to DLP processes.
- Selected a sample of 20 teleworking employees from each selected department for detailed testing.

AUDIT RESULTS

Summary

Within the scope of the audit, there is reasonable assurance that the County's teleworking risk exposure is minimized by the GWOW Telework Program, in combination with implementation of the DLP system. However, management controls should be strengthened to ensure adequate monitoring of teleworker productivity and compliance with information security protocols. To address these control weaknesses, OAAS identified the following findings, along with recommendations for improvement.

A summary of noted exceptions by department is presented in Table 2 below:

Table 2: Summary of Audit Test Results and Related Recommendations

Department	Exceptions	Recommendations
A&C	3	3
DPW	3	3
DCSS	2	2
SSS	1	1

Finding I:

Management Controls over the GWOW Telework Program Need Improvement

Although countywide telework policies and programs were established through the GWOW Telework Program, management controls over the following areas need improvement:

- Establishing written telework agreements
- Teleworker training

Internal Controls were not Fully Effective to Ensure Proper Execution of Written Agreements – Written agreements were not in place for all teleworking staff for 2 out of 4 sampled departments (50%), during the scoped period. Specifically:

- **A&C:** An approved telework agreement was not in place for 7 out of 20 sampled employees (35%).
- **DPW:** None of the 20 sampled employees had an approved telework agreement in place.
- **DCSS and SSS:** Written agreements were in place for all sampled teleworking employees.

According to the A&C and DPW Telework Coordinators, supervisors were delegated the responsibility to ensure telework agreements were in place for teleworking employees, but there was no follow-up activity by the coordinators to ensure agreements were properly executed.

Without a telework agreement, department management may not know which employees were approved to telework. The telework agreements also set the conditions and requirements for the teleworking employee and establish the basis for monitoring productivity and ensuring compliance with information security protocols.

According to DHR Policy 108, each participating employee must have a teleworking plan approved by their supervisor. The telework agreement establishes conditions and arrangements for teleworking agreed upon by the teleworker and supervisor, including assignments and productivity objectives to be worked on by the employee at the remote location with expected delivery dates.

Internal Controls were not Fully Effective to Ensure that Adequate Training was Provided to Employees and Supervisors Prior to Teleworking – None of the telework coordinators for the sampled departments offered formal telework training sessions to supervisors and staff prior to beginning telework.

Each telework coordinator referred to the telework training available through the County's Learning Management System (LMS) and stated that supervisors of teleworking staff were responsible to ensure LMS trainings were completed. However, tagged telework LMS training did not provide clear guidance on the GWOW Telework Program, nor did it cover management controls related to monitoring productivity and compliance with the County's information security policies. Without proper training and guidance, teleworking employees and their supervisors may not be properly informed of GWOW Telework Program requirements and expectations, including internal controls for ensuring productivity and compliance with information security protocols.

According to DHR Policy 108, all teleworkers and their supervisors should attend training sessions conducted by their departmental teleworking coordinator. BOS Policy C-4 further states that departments are responsible for providing on-the-job training in the development of skills and knowledge essential in carrying out its assigned functions.

Furthermore, according to a testimony by the United States Government Accountability Office (GAO) titled Federal Telework Key Practices That Can Help Ensure the Success of Telework Programs, both employees and supervisors should receive training to ensure a collective understanding of the program. Telework training should include two key components:

- (1) Address policy issues and include general information, such as policy updates and an orientation to telework.
- (2) Focus on telework program activities, including such topics as information technology applications, performance management, and time management.

Recommendation: To improve management controls over the GWOW Telework Program:

1. A&C and DPW telework coordinators should develop a process for tracking submitted agreements to ensure that a Telework Agreement is executed for all teleworking staff and renewed annually.
2. A&C, DCSS, DPW, and SSS telework coordinators should offer formalized telework training which explains GWOW Telework Program expectations, including management controls related to monitoring productivity and compliance with information security protocols, to increase supervisor and staff knowledge and understanding of GWOW Telework Program requirements.

Finding II: Monitoring of the Data Loss Prevention Initiative Should Be Improved

Of the four departments sampled, only SSS actively monitored DLP incidents and resolved flagged incidents in a timely manner.

DCSS and DPW were unaware of the DLP initiative and had not been monitoring the DLP dashboard for flagged incidents. While aware of the initiative, A&C was not reviewing exceptions timely, with 59% of all exceptions flagged between 10/1/2021 to 6/30/22 in an open status. According to the A&C DLP Coordinator, their backlog was due to the re-allocation of staff resources due to the pandemic.

Delayed resolution of a potential data loss incident without justification could result in non-compliance with State law requirements.

According to the Enterprise DLP Guidelines, each business unit and department will be responsible for taking any required actions to resolve true positive incidents based upon each of their own identified internal policies. All new incidents must be initially reviewed and analyzed by each DLP Coordinator within 14 days. Further, according to the California Civil Code 1798.29, a breach of data security should be disclosed in the most expedient time possible and without unreasonable delay.

Recommendation: To improve monitoring of the DLP Initiative:

1. The A&C DLP Coordinator should review and update all backlogged DLP exceptions.
2. To ensure that DLP incidents are reviewed and resolved, DCSS and DPW should assign a DLP Coordinator and review all backlogged DLP exceptions.

Office of Audits & Advisory Services

C
Compliance

R
Reliability

E
Effectiveness

A
Accountability

T
Transparency

E
Efficiency

VALUE

DEPARTMENT'S RESPONSE
(AUDITOR AND CONTROLLER)



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RECEIVED

MAR 22 2023

OFFICE OF AUDITS &
ADVISORY SERVICES

March 22, 2023

TO: Juan R. Perez
Chief of Audits

FROM: Tracy Drager
Auditor and Controller

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: GOVERNMENT WITHOUT WALLS PROGRAM AUDIT

Finding I: Management Controls over the GWOW Telework Program Need Improvement

OAAS Recommendation 1:

To improve management controls over the GWOW Telework Program:

1. A&C and DPW telework coordinators should develop a process for tracking submitted agreements to ensure that a Telework Agreement is executed for all teleworking staff and renewed annually.

Action Plan: A&C agrees with the recommendation. A&C has requested that all managers and supervisors submit their employee's teleworking forms to the A&C telework coordinator. The A&C telework coordinator has created a spreadsheet to track receipt of all teleworking agreements and will periodically compare this list to the active employees who are teleworking. If missing forms are identified, the A&C telework coordinator will request that the supervisor submit the form. This list will be reviewed and updated quarterly.

Planned Completion Date: April 28, 2023

Contact Information for Implementation: Jennifer Busskohl, Sr. DHRO

OAAS Recommendation 2:

To improve management controls over the GWOW Telework Program:

2. A&C, DCSS, DPW, and SSS telework coordinators should offer formalized telework training which explains GWOW Telework Program expectations, including management controls related to monitoring productivity and compliance with information security protocols, to increase supervisor and staff knowledge and understanding of GWOW Telework Program requirements.

Action Plan: A&C agrees with the recommendation. A&C telework coordinator held six formalized training sessions for all teleworking staff, managers and supervisors in August and September 2022. Ongoing training will be held for new hires on a quarterly basis and all

**Department Response to Audit Recommendations: Government Without Walls Program Audit
Page Two
March 22, 2023**

teleworking staff, managers and supervisors will be required to attend an annual training in August/September of each year.

Completion/Implementation Date: September 2022

Contact Information for Implementation: Jennifer Busskohl, Sr. DHRO

Finding II: Monitoring of the Data Loss Prevention Initiative Should Be Improved

OAAS Recommendation 1:

To improve monitoring of the DLP Initiative:

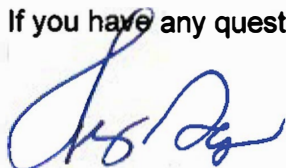
1. The A&C DLP coordinator should review and update all backlogged DLP exceptions.

Action Plan: A&C agrees with the recommendation. The DLP team have reviewed the backlogged items and closed all outstanding items. To prevent future backlogs, the DLP team receives weekly notifications of new and unresolved items. The addition of the weekly report will help to ensure that the DLP team reviews all items within 14 days.

Completion/Implementation Date: March 22, 2023

Contact Information for Implementation: James Bryant, Chief, Administrative Services

If you have any questions, please contact me at (858) 694-2324.



TRACY DRAGER
Auditor and Controller

ADM:TD:tw

DEPARTMENT'S RESPONSE
(DEPARTMENT OF PUBLIC WORKS)



County of San Diego

DEREK R. GADE
INTERIM DIRECTOR

DEPARTMENT OF PUBLIC WORKS
5510 OVERLAND AVENUE, SUITE 410
SAN DIEGO, CA 92123-1237
(858) 694-2212
www.sdcountry.ca.gov/dpw/

March 17, 2023

To: Juan Perez
Chief of Audits

From: Derek R. Gade, P.E., Interim Director
Department of Public Works

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: GOVERNMENT WITHOUT WALLS PROGRAM AUDIT

Finding I: Management Controls over the GWOW Telework Program Need Improvement

OAAS Recommendation: To improve management controls over the GWOW Telework Program:

1. DPW telework coordinators should develop a process for tracking submitted agreements to ensure that a Telework Agreement is executed for all teleworking staff and renewed annually.
2. DPW telework coordinators should offer formalized telework training which explains GWOW Telework Program expectations, including management controls related to monitoring productivity and compliance with information security protocols, to increase supervisor and staff knowledge and understanding of GWOW Telework Program requirements.

Action Plan: DPW agrees with the findings. DPW obtained all telework agreements in June 2022 and drafted a process for tracking submitted agreements to ensure that a telework agreement is in-place for all teleworking staff and renewed annually. To prevent similar non-compliance issues from occurring in the future, DPW is finalizing existing processes and procedures for tracking telework agreements and has made modifications to enhance our ability to ensure annual reviews are done and management controls are in place to monitor training, productivity, and compliance with information security protocols.

Planned Completion Date: March 31, 2023.

Mr. Perez
March 17, 2023
Page 2

Finding II: Monitoring of the Data Loss Prevention Initiative Should Be Improved

OAAS Recommendation: To improve monitoring of the DLP Initiative and to ensure that DLP incidents are reviewed and resolved, DPW should assign a DLP Coordinator and review all backlogged DLP exceptions:

Action Plan: DPW agrees with the findings and has identified five DLP Coordinators who have reviewed the current backlogged items.

Planned Completion Date: March 31, 2023

If you have any questions, please contact Orelia DeBraal, Interim Assistant Director at (858) 505-6470 or Akeem Obasesan, Sr. DHRO at (858) 495-5207.

Respectfully,



ORELIA DEBRAAL, Interim Assistant Director
for Derek R. Gade, P.E., Interim Director

cc: Akintunde Obasesan, Sr. DHRO

DEPARTMENT'S RESPONSE
(DEPARTMENT OF CHILD SUPPORT SERVICES)



County of San Diego

JEFFREY GRISSOM
DIRECTOR

DEPARTMENT OF CHILD SUPPORT SERVICES
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ERIK WELTON
CHIEF LEGAL COUNSEL

March 16, 2023

TO: Juan R. Perez
Chief of Audits

FROM: Jeff Grissom
Director, Child Support Services

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: GOVERNMENT
WITHOUT WALLS PROGRAM AUDIT

Finding I: Management Controls over the GWOW Telework Program Need Improvement

OAAS Recommendation: Telework coordinators should offer formalized telework training which explains GWOW Telework Program expectations, including management controls related to monitoring productivity and compliance with information security protocols, to increase supervisor and staff knowledge and understanding of GWOW Telework Program requirements.

Action Plan: DCSS disagrees with this finding. Training on expectations, monitoring productivity and compliance with information security protocols has been in place since 2020 when telework was first instituted in the department. Staff are trained to understand that production standards and customer service expectations are the same, regardless of work location. All leadership is trained on the department's productivity tools to assess performance. Annually, staff complete State-mandated information security training. Staff are trained on best practices for working from home and leadership is trained on leading staff who work from home.

Planned Completion Date: Completed in 2020

Contact Information for Implementation: Erik Moskavicz (858) 650-6576

Finding II: Monitoring of the Data Loss Prevention Initiative Should Be Improved


OAAS Recommendation: To ensure that DLP incidents are reviewed and resolved, DCSS should assign a DLP Coordinator and review all backlogged DLP exceptions.

Action Plan: DCSS agrees with this finding. A DLP Coordinator was assigned in August 2022.

Planned Completion Date: Completed in August 2022.

Contact Information for Implementation:

If you have any questions, please contact me at (858) 650-6540.



Jeff Grissom,
Director, Child Support Services

DEPARTMENT'S RESPONSE
(SELF-SUFFICIENCY SERVICES)



County of San Diego

NICK MACCHIONE, FACHE
AGENCY DIRECTOR

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RICK WANNE, MA, MFT
DIRECTOR, SELF-SUFFICIENCY SERVICES

March 21, 2023

TO: Juan R. Perez, Chief of Audits

FROM: Rick Wanne, Director, Self-Sufficiency Services

DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: GOVERNMENT WITHOUT WALLS PROGRAM AUDIT

Finding I: Management Controls over the GWOW Telework Program Need Improvement

OAAS Recommendation: SSS telework coordinators should offer formalized telework training which explains GWOW Telework Program expectations, including management controls related to monitoring productivity and compliance with information security protocols, to increase supervisor and staff knowledge and understanding of GWOW Telework Program requirements.

Action Plan: SSS agrees that GWOW Telework Program expectations, which were implemented rapidly due to public health orders, can use additional strengthening. HHSA programs do not have differing internal controls for teleworking employees versus in-person employees relating to productivity, work quality, or program knowledge. Specifically, SSS productivity and quality monitoring is caseload driven, and is the same for both in-person and teleworking staff.

HHSA incorporated information security protocols that do provide specific requirements when working at alternative locations into HHSA Policy and Procedure HHSA L-26: Safeguarding Protected Information in May 2021 to which all employees sign attestations annually. Additionally, HHSA incorporated reference to telework expectations in the HHSA On-boarding training effective November 2022.

To ensure consistency and clarity throughout the Agency, teleworking expectations regarding productivity, security, quality and knowledge, are incorporated into trainings that all staff, regardless of work location, are required to complete. This provides for agility should there be an immediate need to shift in-person staff to telework in the future. HHSA will also include reference to the consistent expectations of staff whether working in-person or at alternative locations in an updated HHSA Code of Conduct to be implemented in July 2023.

**DEPARTMENT RESPONSE TO AUDIT RECOMMENDATIONS: GOVERNMENT WITHOUT WALLS
PROGRAM AUDIT**

March 21, 2023

Page 2 of 2

Finally, HHSA has developed telework specific trainings which are optional for employees to enhance skills and knowledge.

Planned Completion Date: July 2023

Contact Information for Implementation: Alberto Banuelos, Assistant Director of Self-Sufficiency Services. If you have any questions, please contact me at (619) 338-2220.

Respectfully,



RICK WANNE,
Director, Self-Sufficiency Services

cc: Nick Macchione, Agency Director, Health and Human Services Agency
Patty Danon, Chief Operations Officer, Health and Human Services Agency
Amy Thompson, Executive Finance Director, Health and Human Services Agency
Christy Carlson, Agency Compliance Officer, Health and Human Services Agency

**Office of Audits & Advisory Services
Government Without Walls (GWOW) Program Audit (A22-005)
Rebuttal to the Department's Response**

Finding I – Recommendation 2:

OAAS acknowledges that the Department of Child Support Services (DCSS) provided a variety of training material and other documents during the audit, to evidence the provision of telework training for DCSS staff. However, there was no specific training offered on GWOW telework program requirements during the last two fiscal years, according to the telework coordinator. Furthermore, the telework coordinator stated that if staff was struggling with the shift to telework, they were strongly encouraged by their supervisors, to complete trainings in LMS, but not required to do so. Additionally, although telework training in LMS provides general information on the telework program, it does not adequately address monitoring productivity, or compliance with information security protocols.

Training material and documents referenced by DCSS during the audit included the following:

- Telework Training PowerPoint, April 2021.
- Security Awareness for Everyone (SAFE) Training Program.
- Employee Teleworking Guide.
- Guidelines for Success for managers and supervisors.
- Status meeting and Leadership Collaboration Team meeting agendas from 2021.
- Two articles related to productivity from the Harvard Business Review.

Although the referenced training and other documents, in combination, address work expectations, monitoring productivity, and information security, there was insufficient evidence available to verify if all teleworking staff attended the trainings or reviewed the documents.

Therefore, based on the reasons outlined above, OAAS stands by its finding and recommendation.