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Response to Grand Jury Report Form

Report Title: Cybersecurity Strategies for Cities in Ventura County

Report Date: July 27, 2020

Response By: Garry E. Boswell

Title: Deputy Director Administrative Services - Information Services

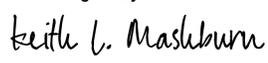
FINDINGS

- I (we) agree with the findings / conclusions numbered: C 01-08 and FA 01-31
- I (we) disagree wholly or partially with the facts numbered: _____
(Attach a statement specifying any portions of the Findings/Conclusions that are disputed; include an explanation of the reasons.)

RECOMMENDATIONS

- Recommendations numbered R-01, 03, 04, 05, 06, 08, 10 have been implemented.
(Attach a summary describing the implemented actions and date completed.)
- Recommendations numbered R09, 11 _____ have not yet been implemented, but will be implemented in the future.
(Attach a timeframe for the implementation.)
- Recommendations numbered R-07 _____ require further analysis.
- Recommendations numbered R-02 _____ will not be implemented because they are not warranted or are not reasonable.

Date: August 11, 2020

DocuSigned by:

 Signed: _____
 Keith L. Mashburn, Mayor
 City of Simi Valley

Number of pages attached: 2

Responses

Recommendation R-01. The Grand Jury recommends Cities establish secure web addresses through the use of HTTPS or other such protocols. (C-02)

Response to R-01: By default the City of Simi Valley uses HTTPS (Hypertext Transfer Protocol Secure) for all internal and external web sites. This practice began in 2010.

Recommendation R-02. The Grand Jury recommends Cities establish trustworthy web addresses by following the California Department of Technology domain name taxonomy guidance. (C-02)

Response to R-02: Some cities are using a second level domain of ca.gov for their domain name, the City registered simivalley.ca.gov.

Simivalley.org is the City's primary domain and is a trustworthy web address. This domain is administered by the IS staff using Network Solutions as the top level domain provider. Registration fees for simivalley.org are \$100 for five years. The City can register simivalley.gov through the United States General Services Administration (GSA), registration fees are \$2,000.00 for five years. Historically the City has not budgeted for this expense. Our analysis concluded the GSA will not allow another organization to register the simivalley.org domain so it is not susceptible to being hijacked. Simi Valley will not fully implement recommendation R-02 based on the cost / risk analysis above. The City has registered simivalley.ca.gov but will not register simivalley.gov.

Recommendation R-03. The Grand Jury recommends Cities utilize free federal and federally aligned cybersecurity services as set forth in Appendix 02 to supplement internal staff and/or replace vendor services whenever possible. (C-03)

Response to R-03: The City uses free cybersecurity services and tools from the federal government and is expanding the number of tools we take advantage of. This practice began in 2018.

Recommendation R-04. The Grand Jury recommends Cities' IT staff subscribe to CISA updates online. (C-03)

Response to R-04: Staff members with Cyber Security responsibilities currently subscribe to CISA updates. This practice began in 2017.

Recommendation R-05. The Grand Jury recommends Cities take advantage of discounted services and cooperative purchasing programs whenever possible. (C-03)

Response to R-05: The City of Simi Valley leverages cooperative purchase agreements whenever possible. This practice began in 2010.

Recommendation R-06. The Grand Jury recommends Cities develop personnel cost-saving opportunities and create a cybersecurity talent pool by recruiting interns or graduating students using: (C-04)

- The Scholarships for Service program described in Appendix 02
- Local education institutions (high school, community college, private college and state university)

Response to R-06: The City entered into an MOU with VCCCD for internships in February 2020. The City registered as an agency official at the National Science Foundation (SFS) to gain access to the IA candidate pool. We will consider candidates from this pool when a position opens up that requires cyber security skills. Timeline: Agency registration has been completed as of July of 2020, hiring will occur as funding permits.

Recommendation R-07. The Grand Jury recommends Cities maintain good vendor management by: (C-03, C-05)

- a. Obtaining CISA assistance to conduct risk management assessments on all third-party vendors that have access to any confidential data or that interact with City networks and systems
- b. Requiring all vendors provide cybersecurity documentation. As part of their ongoing third-party due diligence, Cities should evaluate vendors for compliance and risk on an annual basis
- c. Requiring IT vendors obtain cybersecurity insurance.

Response to R-07:

- a. Further analysis is required. The City has a concern that projects may be delayed if CISA conducts risk management assessments on all third-party vendors that have access to any confidential data and that interact with City networks and systems. A better understanding of the CISA risk management assessment process and response is required. Timeline: August 2020.
- b. The City agrees we should require all vendors to provide cybersecurity documentation and evaluate vendors for compliance on an annual basis.
- c. The City agrees we should require all IT vendors obtain cybersecurity insurance.

Recommendation R-08. The Grand Jury recommends Cities clearly identify expenses for their Information Services (Technology) Departments in their approved budgets. (C-06)

Response to R-08: The City of Simi Valley identifies expense for information technology services within their approved budget. This practice began in 2004.

Recommendation R-09. The Grand Jury recommends Cities develop and test cyber incident response, recovery and business continuity plans. (C-07)

Response to R-09: The City will create cyber incident response, recovery and business continuity plans and testing procedures. Timeline: prior to June 30, 2021.

Recommendation R-10. The Grand Jury recommends Cities implement the best practices for teleworking as published by the California Cyber Security Integration Center. (C-08)

Response to R-10: The City has initiated best practices into our telecommuting guidelines and policies. Timeline: This practice began in July 2020.

Recommendation R-11. The Grand Jury recommends Cities develop a written plan for implementation of R-01 through R-10 prior to December 31, 2020

Response to R-11: The City will develop formal written plans for each recommendation. Timeline: prior to December 31, 2020.