Security of Election Announcements
# TABLE OF CONTENTS

<table>
<thead>
<tr>
<th>Section</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>TABLE OF CONTENTS</td>
<td>i</td>
</tr>
<tr>
<td>ISSUE</td>
<td>1</td>
</tr>
<tr>
<td>EXECUTIVE SUMMARY</td>
<td>1</td>
</tr>
<tr>
<td>Illustrating the Threat</td>
<td>1</td>
</tr>
<tr>
<td>ACRE’s Use of Online Systems to Deliver Election Information</td>
<td>1</td>
</tr>
<tr>
<td>The County’s Current Security Methods</td>
<td>2</td>
</tr>
<tr>
<td>Expert Advice on Protection Against Hacking</td>
<td>2</td>
</tr>
<tr>
<td>Free Resources Available To ACRE</td>
<td>3</td>
</tr>
<tr>
<td>Conclusions</td>
<td>3</td>
</tr>
<tr>
<td>Recommendations</td>
<td>3</td>
</tr>
<tr>
<td>AGENCIES</td>
<td>4</td>
</tr>
<tr>
<td>GLOSSARY</td>
<td>4</td>
</tr>
<tr>
<td>BACKGROUND</td>
<td>6</td>
</tr>
<tr>
<td>Election Threats</td>
<td>6</td>
</tr>
<tr>
<td>Political Cyber Attacks</td>
<td>8</td>
</tr>
<tr>
<td>Escalating Account Compromises</td>
<td>9</td>
</tr>
<tr>
<td>Standard Account Protection Methods</td>
<td>9</td>
</tr>
<tr>
<td>“Man-in-the-Middle” Phishing Can Still Defeat Most Two-Factor Authentication</td>
<td>11</td>
</tr>
<tr>
<td>SMS-Based Two-Factor Authentication Has Additional Vulnerabilities</td>
<td>12</td>
</tr>
<tr>
<td>DISCUSSION</td>
<td>14</td>
</tr>
<tr>
<td>Public Trust in Election Communication</td>
<td>14</td>
</tr>
<tr>
<td>The DHS (and Not the ACRE) Election Security Website Lists Online Platforms Used for Election Announcements as a High Priority for Protection</td>
<td>14</td>
</tr>
<tr>
<td>DHS Directs Voters to County Websites for Trustworthy Election Information</td>
<td>14</td>
</tr>
<tr>
<td>The County’s Email Security</td>
<td>14</td>
</tr>
<tr>
<td>The County Can Protect Against Email Spoofing with DMARC</td>
<td>14</td>
</tr>
<tr>
<td>One-Time PINs for Multi-Factor Authentication Are Vulnerable to Phishing</td>
<td>15</td>
</tr>
<tr>
<td>The County Can Protect Email Accounts from Phishing with Physical Security Keys</td>
<td>16</td>
</tr>
<tr>
<td>Example from Industry: Google Employees Prevent Phishing with FIDO Physical Security Keys</td>
<td>17</td>
</tr>
<tr>
<td>The Cost of FIDO Keys for the Elections Staff</td>
<td>17</td>
</tr>
<tr>
<td>ACRE’s Website Security</td>
<td>18</td>
</tr>
<tr>
<td>ACRE Does Not Protect Its Website with Multi-Factor Authentication: FIDO Keys Can Do That Too</td>
<td>18</td>
</tr>
</tbody>
</table>
ACRE Outsources Management of its Website to Vendors Who Must Be at Least as Secure as the County 18

Social Media Accounts Security 19
  Password Sharing for the County’s Social Media Accounts Used for Election Announcements 19
  Multi-Factor Authentication for the County’s Social Media Accounts Used for Election Announcements 20

Cyber Hygiene Practices 20
  Opportunity to Broaden Election Security Perspective 20
  Availability of Free DHS Cybersecurity Services 21
  Opportunity for Internal Vulnerability Assessments 22

FINDINGS 24
  Vulnerability of Public Trust in Election Communications 24
  Vulnerability of the County’s Email 24
  Vulnerability of ACRE’s Website 24
  Vulnerability of Social Media Accounts 24
  Status of Cyber Hygiene 25

RECOMMENDATIONS 26
  Protect the Public Trust in Election Communication 26
  Protect the County’s Email 26
  Protect ACRE’s Website 26
  Protect the Social Media Accounts 27
  Improve Cyber Hygiene 27

REQUEST FOR RESPONSES 28

METHODOLOGY 28
  County Documents 28
  Site Tours 29
  Interviews 29

ABRIDGED BIBLIOGRAPHY 30
SECURITY OF ELECTION ANNOUNCEMENTS

ISSUE

How secure from cyber attacks is the online election information San Mateo County provides to the public?

EXECUTIVE SUMMARY

Much of the public attention on the topic of election security focuses on the integrity of voter registration databases, voting machines, and vote tabulation. This report is not about the integrity of individual votes. Instead, this report focuses on the vulnerabilities of the County’s email and online communication platforms to hijacking and propagating disinformation in the guise of election instructions or announcements.

Illustrating the Threat

Imagine that a hacker hijacks one of the County’s official social media accounts and uses it to report false results on election night and that local news outlets then redistribute those fraudulent election results to the public. Such a scenario could cause great confusion and erode public confidence in our elections, even if the vote itself is actually secure. Alternatively, imagine that a hacker hijacks the County’s elections website before an election and circulates false voting instructions designed to frustrate the efforts of some voters to participate in the election. In that case, the interference could affect the election outcome, or at least call the results into question.

ACRE’s Use of Online Systems to Deliver Election Information

The U.S. Department of Homeland Security (DHS) encourages voters to get election information directly from their local elections office. In San Mateo County, the office of the Assessor-County Clerk-Recorder and Elections (ACRE) is responsible for carrying out elections and announcing local results. ACRE uses the following online communication platforms to disseminate election information to the public:

1. Email: ACRE sends election information via email to approximately 43,700 registered voters who previously signed up to receive electronic-only delivery of sample ballots and voter information. The County’s Information Services Department (ISD) manages County employee email.

2. Website: ACRE uses the smcacre.org website to publish voter eligibility information along with instructions on how to register to vote, the locations of vote centers, voter instructions, and official local election results for ballots cast within the county. ACRE asked ISD for a limited review during the procurement of the website hosting services,
but ISD is available to all departments for extensive website procurement support and is even able to host department websites itself.

(3) Social Media: ACRE uses its own official Twitter, Instagram, and YouTube accounts to share election information. ACRE also enlists the County Manager’s Office (CMO) to help disseminate election information through the CMO’s official Facebook and Nextdoor accounts.

Concerns about the security of these communications channels are not theoretical. In 2010, hackers hijacked ACRE’s election results webpage and, in 2016, cyberthieves successfully breached several County employee email accounts using “spear phishing” techniques.

The County’s Current Security Methods

In the wake of the spear phishing attack on County email accounts and in an effort to prevent future email account takeovers, the County put in place a multi-factor authentication system that requires users to enter more than just a single password when they log in. This system requires that employees logging in to their email must, in addition to their password, supply extra information that is supposed to be difficult for cyber criminals to obtain. The additional information that many County employees now enter as part of the login process is a unique, one-time authentication code they receive contemporaneously as a text message on their cell phones. CMO uses a similar multi-factor authentication system to prevent a hacker from taking over its official Facebook page. However, there is no multi-factor authentication protection for any of the other social media accounts used by ACRE to broadcast election information or for logging in to ACRE’s website to make changes to it. Additionally, although ISD has a policy against email account password sharing because of the security risks associated with the practice, CMO encourages County departments to share the passwords of official social media accounts in case the person normally responsible for publishing messages is unavailable at the time a department needs to post a statement.

Expert Advice on Protection Against Hacking

The theft of online login account credentials is increasingly common, particularly following the development of automated tools that deceive people into sharing their login information on counterfeit websites that appear to be legitimate. The recent publication of these automated tools now allow hackers to more easily compromise accounts protected with the common forms of multi-factor authentication, like the one-time text-messaged access codes that many County employees receive on their cell phones. According to experts, FIDO physical security keys are the only form of multi-factor authentication that always prevents account hijacking. A FIDO key is a small hardware item about the size of a house key that owners can carry on their keychain and insert or tap to their computers or phones in order to complete their account sign-in process.

In addition, according to DHS, an organization can provide an extra layer of protection against efforts to hack email systems by implementing an email verification setting called DMARC. Lastly, organizations can avoid sharing passwords to their official social media accounts by
using an existing feature that allows their employees to use their individual work accounts to manage their organizations’ accounts.

Free Resources Available To ACRE

There are eight free cybersecurity services that DHS tailors to local elections offices and offers upon request (see Table 2 in Discussion). Some of these DHS services directly relate to the type of risk this report details—namely that of hackers taking over an online communication account. However, ACRE has not taken advantage of many of these free DHS services.

Conclusions

The Grand Jury finds that the security protections against hijacking of ACRE’s website, email, and social media accounts are not adequate to protect against the current cyber threats. These vulnerabilities expose the public to potential disinformation by hackers who could hijack an ACRE online communication platform to mislead voters before an election or sow confusion afterward. Public confidence is at stake, even if the vote itself is secure.

Recommendations

The Grand Jury makes detailed recommendations, which represent short-term fixes to address the immediate risk to upcoming elections and longer-term changes to continually assess the broader cybersecurity threats to election information. In the short term, those ACRE, CMO, and ISD employees critical to the dissemination of election information should protect their accounts with FIDO physical security keys as part of a stronger multi-factor authentication process. In the long term, ACRE and ISD should form a multi-department elections security team in order to evaluate and subscribe to free and tailored DHS services exclusively offered to elections divisions. All of these actions would better safeguard our elections.¹

¹ This report contains a large volume of technical information, which the Grand Jury intends to serve as a fully-referenced guide for improvements to the security of election announcements. The Grand Jury worded the executive summary for readers less interested in the underlying technology.
AGENCIES

ACRE:
the office of the Assessor-County Clerk-Recorder and Elections in San Mateo County, which is responsible for carrying out elections in the County and reporting local election results, among other things

CMO:
the County Manager’s Office in San Mateo County

Controller’s Office:
the Controller’s Office in San Mateo County performs internal audits of departments’ operations, among other things

DHS:
the U.S. Department of Homeland Security

ISD:
the Information Services Department in San Mateo County, which is responsible for managing all County email accounts and the security of the County network, among other things

GLOSSARY

Domain-based Message Authentication, Reporting, and Conformance (DMARC):
a free email setting that reduces phishing by eliminating spoofing

Fast IDentity Online (FIDO) Alliance:
representatives of technology companies that coalesced to improve account security standards

FIDO security key:
the generic technology for a resilient piece of hardware that owners can carry on their keychain and insert or tap to their computers or phones as part of the account sign-in process

island hopping:
technique used in half of cyber attacks where a hacker penetrates the weaker security of an organization with whom the ultimate target does business in order to more easily breach the security of the ultimate target

man-in-the-middle phishing attacks:
when a convincing counterfeit website acts as a passthrough to phish user login credentials and simultaneously authenticate those stolen credentials with the genuine service

multi-factor authentication (often two-factor authentication):
proof of identity at login using the combination of more than one thing the user knows (e.g., password), has (e.g., cell phone or a FIDO physical security key), or is (e.g., fingerprint)
multi-user administration:  
a configuration where two or more employees can each control an official County social media page with their own unique accounts, eliminating the need to share passwords

one-time pin or one-time password (OTP):  
numeric access codes generated during the multi-factor authentication process that people often receive on their phones

online communication platform:  
shorthand in this report for email, the ACRE website, and County social media pages

phishing:  
the use of social engineering methods to manipulate unsuspecting people to take an action on behalf of the exploiter, commonly this action is to share login credentials

spear phishing:  
targeted and personalized phishing

spoofing:  
a technique where an attacker impersonates someone else, commonly by falsifying the from header in email to misrepresent belonging to the same organization as the recipient or a trusted third-party organization

subscriber identity module (SIM) hijacking or SIM swapping:  
impersonating account holders and deceiving cellular carrier customer service representatives to redirect a number's service to a different phone in the criminal's control
BACKGROUND

Election Threats

Cyber attacks and election interference are two of the top threats in the U.S. intelligence community’s 
“2019 Worldwide Threat Assessment.” The 2016 presidential election increased the general public’s awareness of threats to the integrity of our democracy, so much so that in January 2017 the U.S. Department of Homeland Security (DHS) elevated the importance of elections systems by deeming them part of the “national critical infrastructure”
— i.e., “systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters.”

When characterizing perceived threats to elections, the press often focuses on the risk of corruption of voter registration files,
 corruption of vote tabulation,
 and other unlawful, fraudulent acts. In San Mateo County, the Grand Jury found no reports of voter registration file corruption
 or credible complaints of invalid vote tabulation. Furthermore, the Grand Jury found that there are safeguards in place for these two potential threats:

- a registered voter whose name is illegally removed from the registered voter rolls by hackers can complete same-day registration at voting centers, mitigating the threat of registration removal,

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2 Seventeen member organizations work together to form the Intelligence Community including the Central Intelligence Agency, the Federal Bureau of Investigation, and the Department of Homeland Security. See: https://www.intelligence.gov/how-the-ic-works#our-organizations
11 Grand Jury interviews of multiple ACRE officials.
• someone whose name is fraudulently added to the voter registration lists by hackers must still show proof of voter eligibility in person when casting a ballot for the first time, mitigating the threat of new fictitious registrations, and
• a registered voter in the county can check the status of his or her ballot online to see when it is received and counted (or if there is a problem counting that particular ballot, e.g., a mismatched signature, that requires followup), mitigating the threat of ballot destruction.

However, the Grand Jury learned of multiple cyber crimes perpetrated against the County that illustrate the concern of protecting the integrity of County election information including (1) a 2010 takeover of the election results webpage and (2) a 2016 phishing attack of email accounts of employees in various County departments. While none of these attacks appeared politically motivated, DHS notes there are threats of disinformation around elections that have the potential to sow discord and undermine trust in the political process. As one former DHS official put it, “can you imagine a rumor that the [Associated Press] has been hacked and all the numbers are off?”

13 See: https://www.smcacre.org/my-election-info
14 Grand Jury interviews of multiple ACRE officials.
15 The Office of Assessor-County Clerk-Recorder and Elections (ACRE) manages a website, smcacre.org, which hosts several sensitive election-related pages including:
   (1) smcacre.org/elections for general election information,
   (2) smcacre.org/how-vote for detailed voting instructions,
   (3) smcacre.org/current-election for important dates, ballot measure information, and more about the current or most recent election,
   (4) apps.smcacre.org/raceTRACKER/ to explore the results of votes counted in San Mateo County,
   (5) smcacre.org/post/november-6-2018-election-results-0 (and similar pages) for other copies of official election results of votes counted in San Mateo County, and
   (6) smcacre.org/my-election-info to look up a particular voter’s registration status and the status of a particular ballot cast by that voter.
16 Grand Jury interview of a County official.
17 This report does not disclose details of the phishing attack to protect an ongoing FBI investigation.
18 Grand Jury interview of a County official.
Political Cyber Attacks

The U.S. Department of Justice indictments\(^\text{22}\) and Special Counsel report\(^\text{23}\) that describe extensive Russian state-sponsored attacks intended to sow discord in the 2016 election continue to drive the news. During the attacks, the Russians gained access to two county elections systems in Florida by using phishing emails.\(^\text{24}\) Other recent political cyber attacks include the violation of a Knox County (Tennessee) election results webpage,\(^\text{25}\) a phishing attack against the Contra Costa County elections office,\(^\text{26}\) the targeting of politicians\(^\text{27}\) and related organizations,\(^\text{28,29}\) and the hijacking of a corporate social media account to broadcast anti-Israeli messages.\(^\text{30}\) Relatedly, the use of politically motivated cyber fraud—often with social media accounts—is a well-known tactic by many different perpetrators who undermined protesters and activists in Tibet,\(^\text{31}\) Egypt, and the Philippines, discredited the anti-Russian Ukrainian government, and incited violence against religious minorities in Myanmar.\(^\text{32,33}\)

Escalating Account Compromises

Online account compromises often occur when cyber criminals manipulate people into sharing their online login credentials (e.g., passwords), a process called phishing. Typically, these efforts to steal account login credentials involve spoofing—the impersonation of online accounts of organizations that the victim trusts in order to lure the victim into handing over their information to the imposter. Phishing is on the rise with more than four in five information security professionals reporting attackers targeted their organization with the technique in 2018, and a 20 percent increase in organizations reporting attacks of spear phishing—targeted and personalized phishing—over the previous year. Spear phishing is made easier by the ubiquity of personal information that users share on social media and complemented by the accumulation of stolen personal information, like the 147.9 million personal records stolen in the Equifax breach.

Standard Account Protection Methods

Traditionally, users only protected their online accounts with a password. In an effort to better protect accounts from phishing, many organizations have adopted multi-factor (often two-factor) authentication—proof of identity at login using the combination of more than one thing the user knows, has, or is (see Figure 1). The most common two-factor authentication method combines a password (something the user knows) with an ephemeral one-time pin or one-time password (OTP)—numeric access codes that users often receive via text message on their phones (something the user has).

39 The conventional advice is to make long, complex, and unique passwords for each account. This is infeasible for many people because of the number of different accounts people own unless they use password management applications, which the County does not currently allow on work computers. Additionally, some advocate frequent password resets like the County requires, but research proves this leads to less secure passwords. Half of users rely on common linkages between updated and old passwords for ease of memory, which researchers demonstrated they could determine 17 percent of the time within five guesses based on an old password. See: Zhang, Yinqian, Fabian Monrose, and Michael K. Reiter. 2010. “The Security of Modern Password Expiration: An Algorithmic Framework and Empirical Analysis.” In 17th ACM Conference on Computer and Communications Security. Chicago, IL: Association for Computing Machinery.
41 Many are familiar with multi-factor authentication whenever withdrawing cash from an ATM, which requires a debit card (something someone has) and a PIN (something someone knows).
Figure 1. Simplified Two-Factor Authentication Process. Step 1: Users type their passwords on computers and transmit that information to the cloud-based service to which they want to log in (e.g., Office 365). Step 2: That service requests an additional form of identification (e.g., something else users know like their mother’s maiden name, something users have like a previously registered mobile phone, or something users are like their fingerprint). 43 Step 3: Users type that second authentication factor on their computers. Step 4: Users verify their identity by submitting the requested information on the website. 44


44 Computer and phone icons in Figures 1, 2, and 3 by Patrick Morrison. See: https://thenounproject.com/bluevurt/.
“Man-in-the-Middle” Phishing Can Still Defeat Most Two-Factor Authentication

Security experts agree that even OTP-based multi-factor authentication does not fully protect against phishing.\(^{45,46,47}\) \textit{Man-in-the-middle} phishing attacks—where people type their passwords on a convincing counterfeit website (e.g., Office 365) and the malicious owner of the counterfeit website simultaneously uses the credentials to log in to a genuine service (e.g., Office 365, see Figure 2)—allow thieves to hijack online accounts with or without OTP-based multi-factor authentication protections.\(^{48,49,50}\) Freely available malicious software now enables hackers to more easily deploy such attacks, which increases the vulnerability of systems relying on OTP-based multi-factor authentication.\(^{51,52,53}\) DHS specifically advises against this type of two-factor authentication because of the risk of man-in-the-middle and SIM hijacking attacks (discussed in the following section).\(^{54,55}\)


\(^{47}\) Grand Jury interview of expert witness who has a Ph.D. in computer science and researches online account security.


**Figure 2. Simplified Man-in-the-Middle Phishing Process.** With man-in-the-middle attacks, the only difference with the way two-factor authentication is intended to work (see Figure 1) is that the thieves trick users to enter their passwords on a convincing counterfeit website (e.g., Office 365 [sic], Step 1a), which simultaneously uses the passwords to gain access to the cloud-based service to which the users intended to log in (Step 1b).

**SMS-Based Two-Factor Authentication Has Additional Vulnerabilities**

Two-factor authentication using OTPs sent by text messages—illustrated in Figure 3—have additional vulnerabilities. There is a rise in reports of *subscriber identity module (SIM) hijacking* or *SIM swapping*—impersonating account holders and deceiving cell phone carrier customer service representatives to redirect a number’s service to a different phone in the criminal’s control. By redirecting the phone number, SIM hijackers effectively disable

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calls and text messages on the victim’s phone and then the attackers use the hijacked phone number to reset a victim’s password on a website using an “I forgot my password” account recovery option.\textsuperscript{62}

![SIM Hijacking Process Diagram]

**Figure 3. Simplified SIM Hijacking Process.** With SMS-based two-factor authentication, criminals can commandeer phone numbers and redirect OTP codes (shown in red) in a method called SIM hijacking.\textsuperscript{63}


DISCUSSION

Public Trust in Election Communication

The DHS (and Not the ACRE) Election Security Website Lists Online Platforms Used for Election Announcements as a High Priority for Protection

When describing the election infrastructure that elections officials need to protect, DHS includes information technology (IT) infrastructure that displays election results. Such infrastructure encompasses all the online communication platforms that the County uses to make election-related announcements—including email, the website, and social media accounts. However, ACRE focuses its attention on the security of voter registration systems and the accuracy of vote tabulation. The ACRE webpage on election security never mentions the security of the online communication platforms used to inform voters leading up to and after elections. One ACRE official assured the Grand Jury that, because there is no sensitive information stored on ACRE’s election website, concerns over hacking the website are not high.

DHS Directs Voters to County Websites for Trustworthy Election Information

However, online systems that deliver information about elections are increasingly important. To combat the online spread of disinformation, DHS recommends to voters that they “get election information straight from the source” including your “local election office” and “check [the election office] website” for “accurate information you can trust on the status of your voter registration, polling hours and location, identification requirements, and election results.” This advice assumes that these local sources are secure and will deliver accurate information.

The County’s Email Security

The County Can Protect Against Email Spoofing with DMARC

Since the 2016 email phishing attack, ISD implemented many security features, including redundant email filtering software that manages the risks of malicious incoming email messages. ISD also protects County email with a popular email security policy, called Sender Policy Framework (SPF). However, DHS issued a binding operational directive (18-01) in 2017 requiring that all federal agencies enhance email security by enabling an additional security policy, called Domain-based Message Authentication, Reporting, and Conformance (DMARC). Use of DMARC would complement the County’s SPF settings. DHS does not have the

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65 Grand Jury interviews of multiple ACRE officials.
67 Grand Jury interview of ACRE official.
69 Grand Jury interview of ISD official.
70 Grand Jury interview of ISD official.
72 DMARC is a free email setting that indirectly reduces phishing by eliminating spoofing—a ploy where an attacker falsifies the from header in email to misrepresent belonging to the same organization as the recipient or a trusted
authority to require the County to follow its federal agency directive, and although the current SPF settings and the email filtering software provide many of the DMARC benefits, neither the smcgov.org nor the smcacre.org domains currently protect County email with DMARC. ISD is studying DMARC and intends to use it in the future, but the primary obstacle to its use at this time is the challenge of coordinating system settings with the external partners that also send email on behalf of the County. The federal government recommends DMARC for a broad spectrum of organizations, and DHS strongly encourages its use for elections offices. The City and County of San Francisco already began the process of implementing DMARC email authentication.

One-Time PINs for Multi-Factor Authentication Are Vulnerable to Phishing
Following the successful 2016 phishing attack against a few San Mateo County email accounts, ISD employed a multi-factor authentication service for all County employees. They have several options, but many employees transfer one-time pins (OTPs) sent to them via text message on their previously registered cell phones to verify their identity. However, DHS


73 Grand Jury interview of County official.
74 Grand Jury interview of ISD official.
77 The current settings are “used to collect feedback and gain visibility into email streams without impacting existing flows,” meaning DMARC is not actively protecting San Francisco’s email yet. See: dmarcian. “DMARC Inspector (sfgov.org).” Accessed on April 25, 2019. https://dmarcian.com/dmarc-inspector/?domain=sfgov.org.
78 Grand Jury interview of ISD official.
79 Grand Jury interviews of multiple County officials.
80 ISD instructs County employees how to secure work email accounts in their annual training. The County forbids the use of personal email for County business and prohibits sending County information to an employee’s personal email account. Therefore, the current San Mateo County Information Security Training does not instruct County employees on how to secure personal non-County email accounts. See: Information Services Department. “Information Security Training.” San Mateo County; and see: Information Services Department. “Email Policy.”
specifically advises against this type of two-factor authentication because of the risk of man-in-the-middle and SIM hijacking attacks.\textsuperscript{83,84,85}

The County Can Protect Email Accounts from Phishing with Physical Security Keys
The Grand Jury reviewed expert advice to protect online accounts with \textit{Fast IDentity Online (FIDO) security keys}\textsuperscript{86,87,88}—a piece of hardware the size of a house key that owners can carry on their keychain and insert or tap to their computers or phones as part of their online account login process.\textsuperscript{89} Among its strengths, FIDO keys scramble the authentication ceremony—the sequence of back-and-forth messages required to confirm a user’s identity—so only the legitimate, intended destination can decipher them and so counterfeit phishing websites cannot hijack accounts protected by FIDO keys.\textsuperscript{90,91} Unlike traditional OTP-based two-factor authentication, physical FIDO security keys used in two-factor authentication are phishing proof\textsuperscript{92} and not susceptible to SIM hijacking.\textsuperscript{93,94,95} FIDO keys are not the panacea for security,\textsuperscript{96}

San Mateo County, November 7, 2018.  
\textsuperscript{85} If SMS-based two-factor authentication only occurs while users log in from outside the County network, SIM hijacking is more appealing because bad actors can phish credentials while employees are at work and then only dedicate resources to hijacking phone numbers associated with passwords they successfully phished.  
\textsuperscript{89} The FIDO keys are currently based on either the universal second factor (U2F) or the newer FIDO2 standards. FIDO2 has the same security benefits of U2F, but can also be configured for passwordless login. See: World Wide Web Consortium, and FIDO Alliance. “W3C and FIDO Alliance Finalize Web Standard for Secure, Passwordless Logins,” March 4, 2019. https://www.w3.org/2019/03/pressrelease-webauthn-rec.html.  
\textsuperscript{91} FIDO keys have other advantages over phone-based multi-factor authentication, notably they do not require batteries, they do not require an internet connection, they do not require mobile phone ownership, and they do not involve human transcription of authentication codes, which is time consuming and error prone.  
\textsuperscript{93} Grand Jury interview of expert witness who has a Ph.D. in computer science and researches online account security.  
which demands constant investment and a culture that encourages reporting vulnerabilities and
near misses, but FIDO keys are an important part of an organization’s security strategy since
over 90 percent of attacks rely on phishing.

**Example from Industry: Google Employees Prevent Phishing with FIDO Physical Security Keys**

Google researchers found that OTP-based multi-factor authentication, the type many San Mateo
County employees use, prevented 96 percent of non-targeted phishing attacks but only prevented
76 percent of spear phishing attacks. Two years ago, Google employees started using FIDO
keys instead, and as a result, the company completely eliminated successful phishing attacks
against it. Google also reported that, compared with traditional OTP two-factor authentication
methods, user experience improved because use of FIDO keys is faster and easier than entering
an OTP received via text message on a cell phone, and the company saved “thousands of hours
per year in support cost.”

**The Cost of FIDO Keys for the Elections Staff**
The County projects the cost of elections per registered voter will increase from $11.74 last year
(FY 2017-18) to $14.50 this year (FY 2018-19), and the Board of Supervisors recently
approved an increase of five employees in the next two years to ACRE’s current 14-person full-
time elections staff. Therefore, a deployment of 35 FIDO keys, a conservative overestimate of all that would be required to provide one for each of

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95 Use of physical FIDO keys should also provide the County with the security justification necessary to extend password lifetimes. See: Evans, Jon. “Password Expiration Is Dead, Long Live Your Passwords.” *TechCrunch*, June 2, 2019. https://techcrunch.com/2019/06/02/password-expiration-is-dead-long-live-your-passwords/.

96 Google recalled its branded FIDO key, named Titan, due to a design flaw in the use of Bluetooth, and Yubico recalled the line of FIDO keys used by the federal government, the YubiKey FIPS Series, due to reduced randomness in its encryption process. Both companies patched their vulnerabilities and quickly replaced the affected keys for free. See: Hoffman, Chris. “Hardware Security Keys Keep Getting Recalled; Are They Safe?” *How-To Geek*, June 14, 2019.


103 Grand Jury interview of ACRE official.

the employees that have a role in elections communication,\textsuperscript{105} amounts to a one-time cost of about $875, or just 0.2 cents per registered voter.\textsuperscript{106}

**ACRE’s Website Security**

**ACRE Does Not Protect Its Website with Multi-Factor Authentication: FIDO Keys Can Do That Too**

Hackers hijacked and defaced ACRE’s election results webpage in 2010.\textsuperscript{107} DHS issued an emergency directive (19-01) in 2019 requiring that all federal agency websites mitigate hijacking risks with multi-factor authentication (and discouraging the use of text-message OTPs as a form of multi-factor authentication).\textsuperscript{108} While the County is not required to follow the DHS directive, the directive makes clear the importance of using phishing-proof multi-factor authentication to protect ACRE’s website. However, ACRE does not protect against unlawful alterations to its smcacre.org website using any form of multi-factor authentication.\textsuperscript{109} Free and open-source FIDO libraries exist for a website administrator to enable FIDO authentication for the existing ACRE website.\textsuperscript{110}

**ACRE Outsources Management of its Website to Vendors Who Must Be at Least as Secure as the County**

County departments can manage their websites on their own, they can retain ISD to manage their websites, they can retain a common vendor that several other departments use, or they can choose to retain a different vendor than other departments.\textsuperscript{111} Each choice has advantages and disadvantages. ACRE outsources the domain management and hosting of its smcacre.org website to a third-party vendor.\textsuperscript{112} Retaining a website vendor increases the possibility that hackers could compromise ACRE’s elections website by *island hopping*—a technique used in half of cyber attacks today where a hacker penetrates the weaker security of an organization with whom the ultimate target does business in order to more easily breach the ultimate target.\textsuperscript{113,114,115}

\footnotesize

\textsuperscript{105} While departments and the County may wish to consider a wider deployment, this report assumes 35 FIDO keys, which is more than the number of proposed full-time elections staff because the number should include any County employee that communicates on behalf of ACRE (e.g., CMO Chief Communications Officer) or any County employee that has IT administrative privileges over ACRE resources (e.g., senior ISD employees).

\textsuperscript{106} The cost estimate of $875 is based on 35 keys and $25 per key. The value of 0.2 cents per registered voter assumes 400,000 registered voters.

\textsuperscript{107} Grand Jury interview of County official and supported by corroborating evidence.


\textsuperscript{109} Grand Jury interviews of multiple ACRE officials.


\textsuperscript{111} Grand Jury interview of County Official.

\textsuperscript{112} Grand Jury interviews of multiple ACRE officials.


Social Media Accounts Security

Password Sharing for the County’s Social Media Accounts Used for Election Announcements

While the County’s ISD sets County email and website policies, ISD does not set policies for the County’s use of social media.\textsuperscript{116} Therefore, the online security training materials produced by ISD do not make any recommendations to protect against hacking of official County social media accounts.\textsuperscript{117} The County Manager’s Office (CMO) manages the official San Mateo County social media accounts.\textsuperscript{118} CMO also offers assistance to County departments as they establish their own official social media accounts and advice on the management and utilization of existing official departmental social media accounts.\textsuperscript{119} Some departments choose not to manage social media accounts on particular platforms, and so they send CMO messages for publication on the corresponding official San Mateo County social media webpages.\textsuperscript{120} For example, ACRE does not manage its own Facebook or Nextdoor accounts, and instead, it sends some messages to CMO and asks them to publish the notices on the San Mateo County Facebook and Nextdoor webpages.\textsuperscript{121} The San Mateo County Departmental Social Media Policy produced by CMO requires that multiple employees (limited to department heads, their designees, and any department social media managers) share official social media account passwords in case the primary social media manager is unavailable.\textsuperscript{122,123} ACRE officials gave the same reason for sharing account passwords.\textsuperscript{124} Table 1 lists the social media accounts controlled by ACRE and CMO that the County uses to broadcast election announcements.

\begin{table}[h]
\centering
\begin{tabular}{|c|c|c|c|c|}
\hline
\textbf{Platform} & \textbf{Page} & \textbf{SMC Dept.} & \textbf{Shared Passwords} & \textbf{Two-Factor Protection} \\
\hline
Facebook & facebook.com/CountyofSanMateo & CMO & Yes & SMS OTP \\
\hline
Instagram & instagram.com/smcvote & ACRE & Yes & None \\
\hline
Nextdoor & nextdoor.com/agency-detail/ca/san-mateo-county/county-of-san-mateo & CMO & Yes & None\textsuperscript{126} \\
\hline
Twitter & twitter.com/smcvote & ACRE & Yes & None \\
\hline
YouTube & youtube.com/user/democracylive & ACRE & Yes & None \\
\hline
\end{tabular}
\caption{Social Media Accounts Used to Broadcast Election Announcements.\textsuperscript{125}}
\end{table}

\textsuperscript{116} Grand Jury interview of County official.

\textsuperscript{117} Information Services Department. “Information Security Training.” San Mateo County.

\textsuperscript{118} Grand Jury interviews of multiple County officials.

\textsuperscript{119} Grand Jury interviews of multiple County officials.

\textsuperscript{120} Grand Jury interviews of multiple County officials.

\textsuperscript{121} Grand Jury interviews of multiple County officials.

\textsuperscript{122} County Manager’s Office. “San Mateo County Departmental Social Media Policy.” San Mateo County. April 2015.

\textsuperscript{123} Grand Jury interviews of multiple County officials.

\textsuperscript{124} Grand Jury interviews of multiple County officials.

\textsuperscript{125} ACRE formerly hosted pictures with a Flickr account (flickr.com/photos/28783904@N05), but since the account remains unchanged since July 2008 ACRE should consider archiving those pictures elsewhere and deleting the account.

\textsuperscript{126} Multi-factor authentication is currently unavailable on Nextdoor.
Sharing passwords was a common practice years ago, but is not necessary on Facebook, Twitter, Instagram, and YouTube because all of these platforms now allow multi-user administration—a configuration where two or more employees can each control an official County social media page with their individual accounts. Password sharing for social media accounts in an organization often inhibits the organization from enabling multi-factor authentication. Organizations that share passwords also run a higher risk of disgruntled workers giving the shared password to unauthorized individuals due to the lack of accountability or former employees still having the ability to control a shared account after their employment ends if the password is not changed.

Multi-Factor Authentication for the County’s Social Media Accounts Used for Election Announcements
The San Mateo County Departmental Social Media Policy produced by CMO also does not make any recommendations about using multi-factor authentication. Facebook, Twitter, and YouTube support the same FIDO-key multi-factor authentication described previously. Hackers demonstrated the ability to hijack social media accounts without FIDO-key authentication to spread disinformation, even to make political statements on behalf of trusted organizations.

Cyber Hygiene Practices

Opportunity to Broaden Election Security Perspective
Many elections employees have some security responsibilities. However, ACRE intentionally silos many security issues on a need-to-know basis in an effort to contain risk. For instance,

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133 County Manager’s Office. “San Mateo County Departmental Social Media Policy.” San Mateo County. April 2015.
139 Grand Jury interview of multiple ACRE officials.
ACRE’s elections supervisor in charge of security is not involved in most of the security decisions ACRE’s Information Technology group makes.\textsuperscript{141}

**Availability of Free DHS Cybersecurity Services**

DHS offers free cybersecurity advisories to state and local governments through a program called the Multi-State Information Sharing and Analysis Center, which one of the ISD employees interviewed and one of the ACRE employees interviewed acknowledged they receive.\textsuperscript{142,143} However, no ACRE employee acknowledged utilizing any of the free DHS consulting tailored to each elections office in the catalog of services for election infrastructure, listed in Table 2. In interviews, one ACRE employee said ISD is responsible for procuring other DHS services\textsuperscript{144} and another ACRE employee explained how ACRE would work closely with ISD if DHS identified network vulnerabilities.\textsuperscript{145} While an ISD employee explained how it encourages and would collaborate with ACRE to improve ACRE’s security, but subscribing to DHS services for the sole benefit of one department—ACRE—is up to ACRE to initiate.\textsuperscript{146,147} The same ISD employee recalled learning that a nearby county utilizes DHS’s election-specific services.\textsuperscript{148} For its part, DHS makes it clear that they can only provide cybersecurity assistance “to election officials who request it.”\textsuperscript{149}

\begin{itemize}
\item \textsuperscript{140}Grand Jury interview of ACRE official.
\item \textsuperscript{141}Grand Jury interview of ACRE official.
\item \textsuperscript{142}Grand Jury interviews of multiple County officials.
\item \textsuperscript{144}Grand Jury interview of ACRE official.
\item \textsuperscript{145}Grand Jury interview of ACRE official.
\item \textsuperscript{146}A department must still “work with ISD to validate, implement, and/or manage” any new technology service that impacts the County’s network.
\item \textsuperscript{147}Grand Jury interview of ISD official.
\item \textsuperscript{148}Grand Jury interview of ISD official.
\end{itemize}
Table 2. DHS Cybersecurity Services Offered to Elections Divisions.

<table>
<thead>
<tr>
<th>Program</th>
<th>Quoted Description of No-Cost, Voluntary Service</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cyber Resilience Review</td>
<td>interview-based assessment to evaluate... operational resilience and cybersecurity practices... to manage cyber risk during normal operations and times of operational stress and crisis</td>
</tr>
<tr>
<td>External Dependencies Management</td>
<td>interview-based assessment to evaluate… management of… risks arising from external dependencies within the information and communication technology (ICT) supply chain</td>
</tr>
<tr>
<td>Infrastructure Survey</td>
<td>evaluates the effectiveness of organizational security controls, cybersecurity preparedness, and overall resilience</td>
</tr>
<tr>
<td>Phishing Campaign Assessment</td>
<td>evaluates… susceptibility and reaction to phishing emails. [the service is] meant to provide guidance, measure effectiveness, and justify resources needed to defend against spear-phishing</td>
</tr>
<tr>
<td>Risk and Vulnerability Assessment</td>
<td>designed to determine whether and by what methods an adversary can defeat network security controls</td>
</tr>
<tr>
<td>Vulnerability Scanning (formerly</td>
<td>incentivizes modern security practices and enables participants to reduce their exposure to exploitable vulnerabilities, which… increas[es] the Nation’s overall resiliency</td>
</tr>
<tr>
<td>known as Cyber Hygiene scanning)</td>
<td>(formerly known as Cyber Hygiene scanning)</td>
</tr>
<tr>
<td>Validated Architecture Design Review</td>
<td>encompasses architecture and design review, system configuration, log file review, and sophisticated analysis of network traffic to… identify anomalous (and potentially suspicious) communication flows</td>
</tr>
<tr>
<td>Cybersecurity Evaluation Tool</td>
<td>evaluate[s]... cybersecurity posture against recognized standards and best practice recommendations in a systematic, disciplined, and repeatable manner</td>
</tr>
</tbody>
</table>

Opportunity for Internal Vulnerability Assessments
ISD does conduct network vulnerability assessments for the entire County under a “Vulnerability Scanning” program DHS offers to state and local governments like the one listed in Table 2 for elections divisions. These assessments are automated scans of devices on the network, not an investigation into behavioral sources of network vulnerability. “[M]any of the most harmful attacks on computer systems originate with an attacker targeting a human being.” The County

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151 Grand Jury interview of ISD official.
152 Grand Jury interview of ISD official and supported by corroborating evidence.
Controller’s Office “also performs internal audits of departments’ operations.”\textsuperscript{154,155} One of the auditors in the Internal Audit Division of the Controller’s Office specializes in information technology.\textsuperscript{156} The Internal Audit Division conducts limited-scope cyber hygiene assessments during some internal audits, but it has not conducted such an audit of the ACRE Elections Division.\textsuperscript{157} Due to resource and expertise constraints, the Controller’s Office generally limits the scope of cyber hygiene assessments to things like software update practices.\textsuperscript{158} However, both the Controller’s Office and ISD worked together in the past to conduct cyber hygiene assessments that evaluated security practices and compliance with information technology policies.\textsuperscript{159} Officials from both the Controller’s Office and ISD indicated they would be amenable to working together to review the security practices and compliance of ACRE.\textsuperscript{160}

\textsuperscript{155} Grand Jury interview of Controller’s Office official.
\textsuperscript{156} Grand Jury interview of Controller’s Office official.
\textsuperscript{157} Grand Jury interview of Controller’s Office official.
\textsuperscript{158} Grand Jury interview of Controller’s Office official.
\textsuperscript{159} Grand Jury interview of multiple County officials.
\textsuperscript{160} Grand Jury interviews of Controller’s Office and ISD officials.
**FINDINGS**

**Vulnerability of Public Trust in Election Communications**

F1. The veracity of the County’s election broadcasts on any ACRE or CMO online communication platform is important to the public’s trust in the electoral process.

F2. Unlike DHS, ACRE does not include the security of online election communications when describing election security on its website.

F3. Protecting online communication platforms with multi-factor authentication that is susceptible to SIM hijacking, phishing, and man-in-the-middle attacks—as is the case with the use of one-time PINs (OTPs) sent to cell phones—exposes the County to election disinformation attacks.

**Vulnerability of the County’s Email**

F4. Although the County implemented several email security protections that provide many of the DMARC benefits following a 2016 phishing attack, the County’s email security practices do not follow DHS guidelines for federal agencies due to the absence of complementing DMARC protection.

F5. The County utilizes multi-factor authentication methods for its email that remain susceptible to SIM hijacking, phishing, and man-in-the-middle attacks.

**Vulnerability of ACRE’s Website**

F6. ACRE’s website security practices do not follow DHS guidelines for federal agencies requiring the use of multi-factor authentication protection by users who have the system permissions to alter the ACRE webpages.

F7. ACRE outsources the domain management and hosting of its smcacre.org website to a third-party vendor.

**Vulnerability of Social Media Accounts**

F8. The San Mateo County Information Security Training produced by ISD does not make any recommendations for security practices of official County social media accounts.

F9. The San Mateo County Departmental Social Media Policy produced by CMO requires that multiple employees share official social media account passwords.

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F10. ACRE and CMO employees share passwords to their official social media accounts listed in Table 1 with multiple employees within their offices.

F11. The San Mateo County Departmental Social Media Policy produced by CMO does not make any recommendations about using multi-factor authentication to protect against an unlawful takeover of social media accounts.

F12. The ACRE and CMO social media accounts listed in Table 1, with the exception of the CMO Facebook page, do not use multi-factor authentication.

**Status of Cyber Hygiene**

F13. ACRE and ISD could strengthen their coordination of the evaluation and addition of security features to address election security.

F14. ISD utilizes a DHS “Vulnerability Scanning” service for the entire County, but ACRE does not utilize any of the other seven free elections-specific DHS services listed in Table 2.

F15. ISD runs network vulnerability assessments (“Vulnerability Scanning”) for the County devices, but does not audit the practices of employees to identify behavioral sources of network vulnerability.

F16. The Internal Audit Division of the County Controller’s Office “performs internal audits of departments’ operations,” which has sometimes included cyber hygiene assessments.

F17. The Internal Audit Division of the County Controller’s Office has not performed a cyber hygiene assessment of the Elections Division of ACRE.
RECOMMENDATIONS

Protect the Public Trust in Election Communication

R1. **Incorporate Communications into Election Security Definition:** ACRE should adopt a policy that defines election security to include the security of the ACRE website, ACRE staff email accounts, social media accounts used for ACRE announcements, and other platforms ACRE uses for publishing election announcements. ACRE should implement this recommendation by December 31, 2019.

R2. **Publish Updated Security Policy:** ACRE should update the ACRE website’s written descriptions of the election security to incorporate the policy resulting from R1 on the security of election communications in addition to the current focus on security of (a) registration, (b) vote casting, and (c) results tabulation. ACRE should implement this recommendation by June 30, 2020.

Protect the County’s Email

R3. **Prevent Spoofing with DMARC:** ISD, CMO, and ACRE should improve email security for employees involved in election announcements by configuring and enabling DMARC for at least the smcacre.org and smcgov.org domains. ISD, CMO, and ACRE should implement this recommendation by June 30, 2020.

R4. **Combat ACRE Email Account Phishing with FIDO Keys:** ACRE should provide FIDO physical security keys to each of its permanent elections employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should implement this recommendation by December 31, 2019.

R5. **Combat Other Email Account Phishing with FIDO Keys:** ACRE should identify County employees outside of ACRE that have a role in election announcements (e.g., Chief Communications Officer, senior ISD employees, etc.) and ask that the departments of the identified employees provide FIDO physical security keys to each of the identified employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should complete this recommendation by December 31, 2019.

Protect ACRE’s Website

R6. **Combat Website Account Phishing with FIDO Keys:** ACRE should require all County employees whose user accounts allow them to alter the ACRE website to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

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164 Including all accounts capable of directly editing the ACRE website, managing the smcacre.org domain, and any administrator account capable of managing other accounts that can edit the website or manage the domain.
R7. **Combat Island Hopping with FIDO Key Vendor Requirement:** ACRE and ISD should require employees and contractors of any vendor that hosts the ACRE website to use FIDO physical security keys as part of their multi-factor authentication.\(^{165}\) ACRE and ISD should implement this recommendation by December 31, 2019.

**Protect the Social Media Accounts**

R8. **Stop Sharing Social Media Account Passwords:** ACRE and CMO should implement procedures whereby communications staff manage official County social media accounts with multi-user administration, and no employees share social media account passwords. ACRE and CMO should implement this recommendation by October 31, 2019.

R9. **Request FIDO Key Feature If Not Available:** ACRE and CMO should jointly draft and send a FIDO-key feature request citing this report to the social media companies used by the County to broadcast election announcements, but that do not currently offer FIDO account security protections—especially Instagram and Nextdoor. ACRE and CMO should implement this recommendation by August 31, 2019.

R10. **Combat ACRE Social Media Account Phishing with FIDO Keys:** ACRE should require any employee social media accounts capable of administering the official ACRE social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

R11. **Combat SMC Social Media Account Phishing with FIDO Keys:** CMO should require any employee social media accounts capable of administering the official San Mateo County social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. CMO should implement this recommendation by December 31, 2019.

**Improve Cyber Hygiene**

R12. **Coordinate Election Security with Interdepartmental Working Group:** ACRE and ISD should create an election security working group that meets periodically and is responsible for evaluating and improving the security of elections (a) registration, (b) vote casting, (c) results tabulation, and (d) communication within San Mateo County. ACRE and ISD should implement this recommendation by December 31, 2019.

R13. **Evaluate Free DHS Elections Security Assistance Programs:** ACRE and ISD election-security working group should evaluate the benefits of having all members of the election-security working group participate in any of the free DHS elections security assistance

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\(^{165}\) At a minimum for any user account with a public portal capable of administering the ACRE website, any virtual private network (VPN) account that can access a private portal capable of administering the ACRE website, any account capable of managing the smcacre.org domain, and every email account within the vendor organization.
programs listed in Table 2. ACRE and ISD should implement this recommendation by February 3, 2020.

R14. **Offer Behavioral Cyber Hygiene Audits:** ISD and the County Controller’s Office should develop a behavioral auditing program consisting of sampling the day-to-day routines and security practices of employees, contractors, and/or vendors and offer to audit each department within the County periodically to (1) evaluate compliance with existing cyber hygiene policies and (2) provide proactive advice on cyber hygiene improvements that could inform new policies. ISD and the Controller’s Office should begin to implement this recommendation by offering to audit ACRE and ISD (itself) in time to finish by February 3, 2020.

**REQUEST FOR RESPONSES**

Pursuant to Penal Code Section 933.05, the Grand Jury requests responses to the previously stated findings and recommendations from:

- The County of San Mateo Board of Supervisors, on behalf of:
  - The County Manager’s Office (CMO)
  - The Information Services Department (ISD)
- The San Mateo County Assessor-County Clerk-Recorder and Elections Office (ACRE)
- The San Mateo County Controller’s Office

The governing body indicated above should be aware that the comment or response of the governing body must be conducted subject to the notice, agenda, and open meeting requirements of the Brown Act.

**METHODOLOGY**

The Grand Jury:

- reviewed all documents, websites, and articles with full citations in the footnotes of the body of this report and the key references listed in an abridged bibliography at the end of this report,
- visited and toured the elections headquarters at 40 Tower Road, and
- interviewed 13 San Mateo County officials and one expert from industry further described below.

**County Documents**

- Church, Mark. “San Mateo County Election Infrastructure Security.” Memo to Board of Supervisors, March 20, 2018.
- County Manager’s Office. “San Mateo County Departmental Social Media Policy.” San Mateo County, April 2015.

Site Tours
• The San Mateo County elections headquarters at 40 Tower Road

Interviews
• Officials within the office of Assessor-County Clerk-Recorder and Elections (ACRE)
• Official within the Controller’s Office
• Officials within the County Manager’s Office (CMO)
• Officials within the Information Services Department (ISD)
• Expert witness who has a Ph.D. in computer science and contributes to account security efforts within one of the largest global technology companies headquartered nearby


ABRIDGED BIBLIOGRAPHY


September 23, 2019

Honorable Donald J. Ayoob  
Judge of the Superior Court  
c/o Charlene Kres евич  
Hall of Justice  
400 County Center, 2nd Floor  
Redwood City, CA 94063-1655


Dear Hon. Donald J. Ayoob:

We are in receipt of the Grand Jury’s final report titled “Security of Elections Announcements.” Pursuant to your request for responses, the Assessor-County Clerk-Recorder & Chief Elections Officer (hereinafter “ACRE”) responds to the Grand Jury’s findings, recommendations and conclusions as follows:

FINDINGS

F1: The veracity of the County’s election broadcasts on any ACRE or CMO online communication platform is important to the public's trust in the electoral process.

Response: ACRE agrees with this finding.

F2: Unlike DHS, ACRE does not include the security of online election communications when describing election security on its website.

Response: ACRE partially agrees with this finding.

ACRE will provide appropriate security information on the Elections website in a similar manner as utilized by DHS and as recommended by ACRE’s Cybersecurity vendor.

F3: Protecting online communication platforms with multi-factor authentication that is susceptible to SIM hijacking, phishing, and man-in-the-middle attacks—as is the case with the use of one-time PINs (OTPs) sent to cell phones—exposes the County to election disinformation attacks.
Response: ACRE partially agrees with this finding. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

**F4:** Although the County implemented several email security protections that provide many of the DMARC benefits following a 2016 phishing attack, the County’s email security practices do not follow DHS guidelines for federal agencies due to the absence of complementing DMARC protection.

**Response:** This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

**F5:** The County utilizes multi-factor authentication methods for its email that remain susceptible to SIM hijacking, phishing, and man-in-the-middle attacks.

**Response:** This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

**F6:** ACRE’s website security practices do not follow DHS guidelines for federal agencies requiring the use of multi-factor authentication protection by users who have the system permissions to alter the ACRE webpages.

**Response:** ACRE partially agrees with this finding.

ACRE’s website support vendor currently utilizes multi-factor authentication (MFA). ACRE is working with the SMC ISD team to implement MFA equivalent to FIDO for ACRE’s content contributors.

**F7:** ACRE outsource the domain management and hosting of its smcacre.org website to a third-party vendor.

**Response:** ACRE agrees with this finding.

**F8:** The San Mateo County Information Security Training produced by ISD does not make any recommendations for security practices of official County social media accounts.
Response: This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F9: The San Mateo County Departmental Social Media Policy produced by CMO requires that multiple employees share official social media account passwords.

Response: This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F10: ACRE and CMO employee share passwords to their official social media accounts listed in Table 1 with multiple employees within their offices.

Response: ACRE agrees with this finding.

F11: The San Mateo County Departmental Social Media Policy produced by CMO does not make any recommendations about using multi-factor authentication to protect against an unlawful takeover of social media accounts.

Response: This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F12: The ACRE and CMO social media accounts listed in Table 1, with the exception of the CMO Facebook page, do not use multi-factor authentication.

Response: ACRE agrees with this finding. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F13: ACRE and ISD could strengthen their coordination of the evaluation and addition of security features to address election security.

Response: ACRE partially disagrees with this finding.

ACRE and ISD meet and discuss all aspects of cybersecurity at monthly IT Security meetings, and quarterly IT Governance meetings. Additional coordination meetings occur on an as needed based on projects or events.
F14: ISD utilizes a DHS “Vulnerability Scanning” service for the entire County, but ACRE does not utilize any of the other seven free elections-specific DHS services listed in Table 2.

Response: ACRE partially disagrees with this finding.

ACRE uses services and information provided through DHS, MS-ISAC, EI-ISAC, and the Secretary of States Cybersecurity team. Additionally, ACRE works with our Cybersecurity vendor to assess Election operations security needs. ACRE will continue to coordinate with ISD and their Cybersecurity administration team to ensure ACRE Elections security needs are met and will evaluate the appropriate use of DHS tools identified in Table 2.

F15: ISD runs network assessments (“Vulnerability Scanning”) for the County devices but does not audit the practices of employees to identify behavioral sources of network vulnerability.

Response: This finding was addressed to the County. ISD addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F16: The Internal Audit Division of the County Controller’s Office “performs internal audits of departments’ operations,” which has sometimes included cyber hygiene assessments.

Response: This finding was addressed to the Controller. The Controller addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

F17: The Internal Audit Division of the County Controller’s Office has not performed a cyber hygiene assessment of the Elections Division of ACRE.

Response: This finding was addressed to the Controller. The Controller addressed this finding in its reply.

Please see CMO / ISD response for more information and details.

RECOMMENDATIONS

R1: Incorporate Communications into Election Security Definition: ACRE should adopt a policy that defines election security to include the security of the ACRE
website, ACRE staff email accounts, social media accounts used for ACRE announcements, and other platforms ACRE uses for publishing election announcements. ACRE should implement this recommendation by December 31, 2019.

**Response:** The recommendation requires ACRE to work with SMC, ISD and our cybersecurity vendor to revise the Department's security policies. ACRE will complete the updates to include the Department website, email accounts, social media and other platforms that ACRE utilizes for elections announcement.

**R2:** Publish Updated Security Policy: ACRE should update the ACRE website’s written descriptions of the election security to incorporate the policy resulting from R1 on the security of election communications in addition to the current focus on security of (a) registration, (b) vote casting, and (c) results tabulation. ACRE should implement this recommendation by June 30, 2020.

**Response:** ACRE will update its Election and Security Accuracy page on the ACRE website to conform to the policies established in Recommendation 1 above.

**R3:** Prevent Spoofing with DMARC: ISD, CMO, and ACRE should improve email security for employees involved in election announcements by configuring and enabling DMARC for at least the smcacre.org and smcgov.org domains. ISD, CMO, and ACRE should implement this recommendation by June 30, 2020.

**Response:** ISD replied to this recommendation in its reply. ACRE will work with ISD, CMO to improve email security for employees involved in election announcement.

Please see CMO / ISD response for more information and details.

**R4:** Combat ACRE Email Account Phishing with FIDO Keys: ACRE should provide FIDO physical security keys to each of its permanent elections employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should implement this recommendation by December 31, 2019.

**Response:** ISD addressed this recommendation in its reply. ACRE will coordinate with ISD to determine the best means to implement FIDO type MFA for Elections Division’s email accounts.

Please see CMO / ISD response for more information and details.
R5: Combat Other Email Account Phishing with FIDO Keys: ACRE should identify County employees outside of ACRE that have a role in election announcements (e.g., Chief Communications Officer, senior ISD employees, etc.) and ask that the departments of the identified employees provide FIDO physical security keys to each of the identified employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should complete this recommendation by December 31, 2019.

Response: ACRE agrees with this recommendation and will coordinate with ISD to determine the best means to implement FIDO type MFA for other official email accounts as directed.

R6: Combat Website Account Phishing with FIDO Keys: ACRE should require all County employees whose user accounts allow them to alter the ACRE website to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

Response: ACRE is working with ISD to implement San Mateo County’s MFA standards for ACRE staff that interact with the ACRE website. ACRE’s current website vendor already uses MFA equivalent to FIDO. ACRE will implement MFA for its website.

R7: Combat Island Hopping with FIDO Key Vendor Requirement: ACRE and ISD should require employees and contractors of any vendor that hosts the ACRE website to use FIDO physical security keys as part of their multi-factor authentication. ACRE and ISD should implement this recommendation by December 31, 2019.

Response: The ACRE website vendor uses MFA equivalent to FIDO. This key is required for all access to the ACRE website infrastructure, as well as for any maintenance operations performed by the vendor.

R8: Stop Sharing Social Media Account Passwords: ACRE and CMO should implement procedures whereby communications staff manage official County social media accounts with multi-user administration, and no employees share social media account passwords. ACRE and CMO should implement this recommendation by October 31, 2019.

Response: ACRE will coordinate with CMO to determine the best means to restrict social media account password sharing. In the meantime, ACRE has implemented a Team’s feature for Twitter which allows multiple people to share an account without having to share a password.
R9: Request FIDO Key Feature If Not Available: ACRE and CMO should jointly draft and send a FIDO-key feature request citing this report to the social media companies used by the County to broadcast election announcements, but that do not currently offer FIDO account security protections—especially Instagram and Nextdoor. ACRE and CMO should implement this recommendation by August 31, 2019.

Response: ACRE will work with CMO to draft and send a letter to social media companies requesting that they confirm, or create, support for MFA and FIDO key integration for their platforms. ACRE will work with CMO to complete this recommendation by September 27, 2019.

R10: Combat ACRE Social Media Account Phishing with FIDO Keys: ACRE should require any employee social media accounts capable of administering the official ACRE social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

Response: ACRE concurs with ISD’s response. ACRE will coordinate with ISD to determine the best means to implement FIDO type MFA for Elections Division’s email accounts.

Please see CMO / ISD response for more information and details.

R11: Combat SMC Social Media Account Phishing with FIDO Keys: CMO should require any employee social media accounts capable of administering the official San Mateo County social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. CMO should implement this recommendation by December 31, 2019.

Response: ACRE will follow all guidance provided by CMO.

R12: Coordinate Election Security with Interdepartmental Working Group: ACRE and ISD should create an election security working group that meets periodically and is responsible for evaluating and improving the security of elections (a) registration, (b) vote casting, (c) results tabulation, and (d) communication within San Mateo County. ACRE and ISD should implement this recommendation by December 31, 2019.

Response: The recommendation has been implemented.

R13: Evaluate Free DHS Elections Security Assistance Programs: ACRE and ISD election-security working group should evaluate the benefits of having all members of the election-security working group participate in any of the free
DHS elections security assistance programs listed in Table 2. ACRE and ISD should implement this recommendation by February 3, 2020.

**Response:** ACRE will work with ISD to determine if any of the additional free services offered by DHS, beyond those already in use, would provide improved benefits. This assessment of DHS free services will be completed by October 31, 2019.

Please see CMO / ISD response for more information and details.

**R14:** Offer Behavioral Cyber Hygiene Audits: ISD and the County Controller’s Office should develop a behavioral auditing program consisting of sampling the day-to-day routines and security practices of employees, contractors, and/or vendors and offer to audit each department within the County periodically to (1) evaluate compliance with existing cyber hygiene policies and (2) provide proactive advice on cyber hygiene improvements that could inform new policies. ISD and the Controller’s Office should begin to implement this recommendation by offering to audit ACRE and ISD (itself) in time to finish by February 3, 2020.

**Response:** The Controller addressed this recommendation in its reply.

Please see CMO / ISD response for more information and details.

The Assessor-County Clerk-Recorder & Chief Elections Officer appreciates the opportunity to provide written responses to the San Mateo County Civil Grand Jury Report titled “Security of Elections Announcements.”

Should the Grand Jury require additional information, please contact me directly at (650) 363-4988.

Sincerely,

Mark Church

cc: Honorable Members of the San Mateo County Board of Supervisors
    Michael P. Callagy, County Manager/Clerk of the Board
    Jon Walton, County Chief Information Officer
    Juan Raigoza, County Controller
    John C. Beiers, County Counsel
County of San Mateo
Inter-Departmental Correspondence

Department: COUNTY MANAGER
File #: 19-970
Board Meeting Date: 10/8/2019

Special Notice / Hearing: None
Vote Required: Majority

To: Honorable Board of Supervisors
From: Michael P. Callagy, County Manager

RECOMMENDATION:

BACKGROUND:
On July 24, 2019, the 2018-2019 San Mateo County Civil Grand Jury issued a report titled “Security of Elections Announcements.” The Board of Supervisors is required to submit comments on the findings and recommendations pertaining to the matters over which it has some decision-making authority within 90 days. The Board’s response to the report is due to the Honorable Donald J. Ayoob no later than October 22, 2019.

DISCUSSION:
The Grand Jury made 17 findings and 14 recommendations in its report. The Board responses follow each finding and recommendation that the Grand Jury requested that the Board respond to within 90 days.

FINDINGS

Vulnerability of Public Trust in Election Communications
Finding 1:
The veracity of the County’s election broadcasts on any ACRE or CMO online communication platform is important to the public’s trust in the electoral process.

Response
Agree

Finding 2:
Unlike DHS, ACRE does not include the security of online election communications when describing election security on its website.

Response:
ACRE submitted a response to this Finding directly to the Civil Grand Jury.

Finding 3:
Protecting online communication platforms with multi-factor authentication that is susceptible to SIM hijacking, phishing, and man-in-the-middle attacks—as is the case with the use of one-time PINs (OTPs) sent to cell phones—exposes the County to election disinformation attacks.

Response:
Partially agree. SIM hijacking is a complex form of mobile phone fraud. ISD recommends that only County-issued devices be used to manage Election and Social Media information. The mobile carriers that provide the County with mobile device service have procedures in place to protect County accounts and devices from these types of attacks. Additionally, the County uses a multi-factor security solution that provides phishing and Real-Time Man-in-the-Middle (MITM) resistance.

Vulnerability of the County’s Email

Finding 4:
Although the County implemented several email security protections that provide many of the DMARC benefits following a 2016 phishing attack, the County’s email security practices do not follow DHS guidelines for federal agencies due to the absence of complementing DMARC protection.

Response:
Partially agree. In 2017, DHS issued binding operational directive (18-01) requiring that all federal agencies enhance email security by enabling an additional security policy, called Domain-based Message Authentication, Reporting, and Conformance (DMARC), with the primary goal of making it difficult to successfully spoof government services. The DHS directive does not directly apply to local governments or the County. However, ISD has already implemented portions of this recommendation and will continue to enhance email security over time using this and other protocols as general guidance for email security best practices.

Finding 5:
The County utilizes multi-factor authentication methods for its email that remain susceptible to SIM hijacking, phishing, and man-in-the-middle attacks.

Response
Partially disagree. According to security and telecommunication experts, SIM hijacking is a complex form of mobile phone fraud. The County uses an industry leading secure multi-factor solution that with capabilities that provide phishing and Real-Time Man-in-the-Middle (MITM) resistance because the technology relies on the physical device and not the SIM/phone number.

Vulnerability of ACRE’s Website

Finding 6:
ACRE’s website security practices do not follow DHS guidelines for federal agencies requiring the use of multi-factor authentication protection by users who have the system permissions to alter the ACRE webpages.
Response:
ACRE submitted a response to this Finding directly to the Civil Grand Jury.

Finding 7:
ACRE outsource the domain management and hosting of its smacacre.org website to a third-party vendor.

Response:
ACRE submitted a response to this Finding directly to the Civil Grand Jury.

Vulnerability of Social Media Accounts
Finding 8:
The San Mateo County Information Security Training produced by ISD does not make any recommendations for security practices of official County social media accounts.

Response:
Partially agree. All County staff are required to take annual IT security training. While there is no specialized security training related to social media accounts, the IT security training provided to staff does provide basic IT security training instruction that is also applicable to social media applications. ISD will include more specific examples of social media IT security in next year’s training.

Finding 9:
The San Mateo County Departmental Social Media Policy produced by CMO requires that multiple employees share official social media account passwords.

Response
Agree. ISD will work with CMO to update this policy and submit it to the Board of Directors for approval by November 30, 2019.

Finding 10:
ACRE and CMO employee share passwords to their official social media accounts listed in Table 1 with multiple employees within their offices.

Response:
Agree

Finding 11:
The San Mateo County Departmental Social Media Policy produced by CMO does not make any recommendations about using multi-factor authentication to protect against an unlawful takeover of social media accounts.

Response:
Agree. The County Social Media Policy will be updated by November 30, 2019.

Finding 12:
The ACRE and CMO social media accounts listed in Table 1, with the exception of the CMO Facebook page, do not use multi-factor authentication.
Response
Agree. Not all social media solution providers currently support multi-factor authentication.

Status of Cyber Hygiene

Finding 13:
ACRE and ISD could strengthen their coordination of the evaluation and addition of security features to address election security.

Response
Partially disagree. ACRE and ISD meet and discuss all aspects of cybersecurity at monthly IT Security meetings and quarterly IT Governance meetings. Additional coordination meetings occur on an as needed based on projects or events.

Finding 14:
ISD utilizes a DHS “Vulnerability Scanning” service for the entire County, but ACRE does not utilize any of the other seven free elections-specific DHS services listed in Table 2.

Response
Partially disagree. ISD uses services and information provided through DHS, MS-ISAC, EI-ISAC, as well as NCRIC to protect County resources. The County currently subscribes to at least one service listed in Table 2 and is in the process of evaluating additional services. ISD is responsible for the overall cybersecurity administration of the County, and as such it would not be appropriate for any individual Department to unilaterally utilize additional services without ISD’s involvement and coordination. ISD will meet with ACRE to determine if additional security tools or services are needed and will implement them based on the confirmed business needs and benefits.

Finding 15:
ISD runs network vulnerability assessments ("Vulnerability Scanning") for the County devices but does not audit the practices of employees to identify behavioral sources of network vulnerability.

Response:
Agree. ISD audits and investigates issues within the County’s environment but has not yet implemented a County-wide network User behavior analytics (UBA) solution. ISD is currently investigating products with UBA capabilities to determine which solutions would best meet the needs of the County.

Finding 16:
The Internal Audit Division of the County Controller’s Office “performs internal audits of departments’ operations,” which has sometimes included cyber hygiene assessments.

Response:
The Controller’s Office submitted a response to this Finding directly to the Civil Grand Jury.

Finding 17:
The Internal Audit Division of the County Controller’s Office has not performed a cyber hygiene assessment of the Elections Division of ACRE.

Response:
The Controller’s Office submitted a response to this Finding directly to the Civil Grand Jury.

RECOMMENDATIONS

Protect the Public Trust in Election Communication

Recommendation 1:
Incorporate Communications into Election Security Definition: ACRE should adopt a policy that defines election security to include the security of the ACRE website, ACRE staff email accounts, social media accounts used for ACRE announcements, and other platforms ACRE uses for publishing election announcements. ACRE should implement this recommendation by December 31, 2019.

Response:
ACRE submitted a response to this Recommendation directly to the Civil Grand Jury.

Recommendation 2:
Publish Updated Security Policy: ACRE should update the ACRE website’s written descriptions of the election security to incorporate the policy resulting from R1 on the security of election communications in addition to the current focus on security of (a) registration, (b) vote casting, and (c) results tabulation. ACRE should implement this recommendation by June 30, 2020.

Response:
ACRE submitted a response to this Recommendation directly to the Civil Grand Jury.

Protect the County’s Email

Recommendation 3:
Prevent Spoofing with DMARC: ISD, CMO, and ACRE should improve email security for employees involved in election announcements and should at least partially implement the Recommendation by June 30, 2020.

Response
ACRE, ISD, and CMO will collaborate to improve email security for employees involved in election announcement and have partial implementation by June 30, 2020.

Recommendation 4:
Combat ACRE Email Account Phishing with FIDO Keys: ACRE should provide FIDO physical security keys to each of its permanent elections employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should implement this recommendation by December 31, 2019.

Response
The Recommendation requires technical analysis by ISD, which will be completed by December 31, 2019. ACRE and ISD will collaborate to determine the best means to implement FIDO type MFA for Elections Division’s email accounts. ISD will determine which U2F devices (FIDO Keys) are best able to secure County systems and provide them as needed to ACRE and other County Departments.

Recommendation 5:
Combat Other Email Account Phishing with FIDO Keys: ACRE should identify County employees
outside of ACRE that have a role in election announcements (e.g., Chief Communications Officer, senior ISD employees, etc.) and ask that the departments of the identified employees provide FIDO physical security keys to each of the identified employees and require the use of those FIDO keys as part of their multi-factor authentication for accessing their County email accounts. ACRE should complete this recommendation by December 31, 2019.

Response
ACRE submitted a response to this Recommendation directly to the Civil Grand Jury.

The Recommendation requires technical analysis by ISD, which will be completed by December 2019. ISD will determine which U2F devices (FIDO Keys) are best able to secure County systems and provide them as needed to ACRE and other County Departments.

Protect ACRE’s Website
Recommendation 6:
Combat Website Account Phishing with FIDO Keys: ACRE should require all County employees whose user accounts allow them to alter the ACRE website to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

Response
ISD will work with ACRE to implement the Recommendation, which requires technical analysis by ISD, that will be completed by December 31, 2019. ISD will determine which U2F devices (FIDO Keys) are best able to secure County systems and provide them as needed to ACRE and other County Departments.

Recommendation 7:
Combat Island Hopping with FIDO Key Vendor Requirement: ACRE and ISD should require employees and contractors of any vendor that hosts the ACRE website to use FIDO physical security keys as part of their multi-factor authentication. ACRE and ISD should implement this recommendation by December 31, 2019.

Response
ACRE submitted a response to this Recommendation directly to the Civil Grand Jury.

The Recommendation requires technical analysis by ISD, which will be completed by December 31, 2019. ISD will determine which U2F devices (FIDO Keys) are best able to secure County systems and provide them as needed to ACRE and other County Departments.

Protect the Social Media Accounts
Recommendation 8:
Stop Sharing Social Media Account Passwords: ACRE and CMO should implement procedures whereby communications staff manage official County social media accounts with multi-user administration, and no employees share social media account passwords. ACRE and CMO should implement this recommendation by October 31, 2019.

Response:
ACRE and CMO will collaborate to determine the best means to restrict social media account password sharing. In the meantime, ACRE has implemented a Team’s feature for Twitter which allows multiple people to share an account without having to share a password.
**Recommendation 9:**
Request FIDO Key Feature If Not Available: ACRE and CMO should jointly draft and send a FIDO-key feature request citing this report to the social media companies used by the County to broadcast election announcements, but that do not currently offer FIDO account security protections—especially Instagram and Nextdoor. ACRE and CMO should implement this recommendation by August 31, 2019.

**Response**
This Recommendation has already been implemented. ACRE, ISD, and CMO collaborated on a letter sent to social media companies requesting that they confirm, or create, support for MFA and FIDO-key integration for their platforms.

**Recommendation 10:**
Combat ACRE Social Media Account Phishing with FIDO Keys: ACRE should require any employee social media accounts capable of administering the official ACRE social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. ACRE should implement this recommendation by December 31, 2019.

**Response**
The Recommendation requires technical analysis by ISD, which will be completed by December 31, 2019. ISD will determine which U2F devices (FIDO Keys) are best able to secure County systems and provide them as needed to ACRE and other County Departments.

**Recommendation 11:**
Combat SMC Social Media Account Phishing with FIDO Keys: CMO should require any employee social media accounts capable of administering the official San Mateo County social media pages listed in Table 1 to use FIDO physical security keys as part of their multi-factor authentication. CMO should implement this recommendation by December 31, 2019.

**Response:**
The Recommendation requires technical analysis by ISD, which will be completed by December 2019. ISD will determine which U2F devices (FIDO Keys) are best able to secure Social Media sites and provide them as requested by County Departments.

**Improve Cyber Hygiene**
**Recommendation 12:**
Coordinate Election Security with Interdepartmental Working Group: ACRE and ISD should create an election security working group that meets periodically and is responsible for evaluating and improving the security of elections (a) registration, (b) vote casting, (c) results tabulation, and (d) communication within San Mateo County. ACRE and ISD should implement this recommendation by December 31, 2019.

**Response:**
The Recommendation has already been implemented.

**Recommendation 13:**
Evaluate Free DHS Elections Security Assistance Programs: ACRE and ISD election-security working group should evaluate the benefits of having all members of the election-security working group participate in any of the free DHS elections security assistance programs listed in Table 2.
ACRE and ISD should implement this recommendation by February 3, 2020.

Response
ACRE and ISD will collaborate to determine if any of the additional free services offered by DHS, beyond those already in use, would provide improved benefits. This assessment of DHS free services will be completed by October 30, 2019.

Recommendation 14:
Offer Behavioral Cyber Hygiene Audits: ISD and the County Controller’s Office should develop a behavioral auditing program consisting of sampling the day-to-day routines and security practices of employees, contractors, and/or vendors and offer to audit each department within the County periodically to (1) evaluate compliance with existing cyber hygiene policies and (2) provide proactive advice on cyber hygiene improvements that could inform new policies. ISD and the Controller’s Office should begin to implement this recommendation by offering to audit ACRE and ISD (itself) in time to finish by February 3, 2020.

Response:
The Recommendation requires further analysis. ISD in the process of reviewing and testing products with network and account User Behavioral Analytics (UBA) capabilities to determine which service or product would best meet the needs of the County. This analysis and testing will be completed by December 31, 2019.

SHARED VISION 2025:
Acceptance of the report contributes to the Shared Vision 2025 outcome of a Collaborative Community by ensuring that all Grand Jury findings and recommendations are thoroughly reviewed by the appropriate County departments and that, when appropriate, process improvements are made to improve the quality and efficiency of services provided to the public and other agencies.

FISCAL IMPACT:
Additional tools and services will be needed to implement the recommendations outlined above. ISD will provide the CMO with an estimate of ISD staff costs, consultants/contractors, and hardware/software by December 2019.
September 20, 2019

The Honorable Donald J. Ayoob
Judge of the Superior Court
c/o Charlene Kresvicich
Hall of Justice
400 County Center, 2nd Floor
Redwood City, CA 94063-1655

Dear Judge Ayoob:

On July 24, 2019, the Grand Jury issued the “Security of Elections Announcements” report that included two findings and one recommendation to the County Controller. This letter provides the Controller’s Office response to the Grand Jury’s findings and recommendation.

Finding 16
The Internal Audit Division of the County Controller’s Office “performs internal audits of departments’ operations,” which has sometimes included cyber hygiene assessments.

Response
Yes, the Controller’s Office performs internal control audits of County operations, which may include assessments of information technology internal controls.

Finding 17
The Internal Audit Division of the County Controller’s Office has not performed a cyber hygiene assessment of the Elections Division of ACRE.

Response
Yes, the Controller’s Office has not performed an information technology risk assessment of the Elections Division.

Recommendation 14
Offer Behavioral Cyber Hygiene Audits: ISD and the County Controller’s Office should develop a behavioral auditing program consisting of sampling the day-to-day routines and security practices of employees, contractors, and/or vendors and offer to audit each department within the County periodically to (1) evaluate compliance with existing cyber hygiene policies and (2) provide proactive advice on cyber hygiene improvements that could inform new policies. ISD and the Controller’s Office should begin to implement this recommendation by offering to audit ACRE and ISD (itself) in time to finish by February 3, 2020.
Response
Agreed. The Controller’s Office will perform separate audits on the Elections Division and on ISD itself. The audits will evaluate compliance with existing policies and provide recommendations to improve policies, including internal control policies and procedures related to cyber hygiene. The Controller’s Office will also consider, based on risk, conducting additional information technology internal control audits on other County Departments.

Please let me know if you have any questions. Thank you.

Sincerely,

Juan Raigoza
Controller

cc: San Mateo County Board of Supervisors
    Michael P. Callagy, County Manager
    Mark Church, Assessor-County Clerk-Recorder & Chief Elections Officer
    Jon Walton, Director of Information Services Department
    Iliana Rodriguez, Deputy County Manager