CITY OF SAN ANTONIO
OFFICE OF THE CITY AUDITOR

INFORMATION TECHNOLOGY SERVICES DEPARTMENT
AUDIT OF SERCURITY AWARENESS TRAINING PROGRAM
PROJECT NO. AU24-022
SEPTEMBER 26, 2024

KEVIN W. BARTHOLD, CPA, CIA, CISA
CITY AUDITOR

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Executive Summary

As part of our annual Audit Plan approved by City Council, we conducted an audit of the Information Technology Services Department (ITSD), specifically the Security Awareness Training Program. The audit objective and conclusion follow:

Determine if ITSD has implemented the State required Security Awareness Training Program effectively and in compliance with State guidelines.

We assessed the Security Awareness Training Program and found that ITSD has sufficient controls in place to ensure citywide compliance with the State of Texas security training requirements. Specifically, ITSD has:

- Established policies and procedures to effectively administer a certified security awareness training program that meets state standards.
- Created controls to ensure all applicable City employees and elected officials complete their training.
- Implemented processes for ensuring completion and self-certification by the required state deadline.

ITSD Management's acknowledgment of audit results is in Appendix B on page 7.

Background

Texas Government Code 2054.519 - State Certified Cybersecurity Training Programs requires the Department of Information Resources (DIR) in consultation with the Texas Cybersecurity Council, to certify at least five cybersecurity training programs for state and local government employees and Section 2054.5191 requires state and local government employees and officials to complete a certified training program. The statute also requires state government contractors to complete a certified training program. Government entities must annually certify their compliance with the training requirements by August 31 using the Cybersecurity Training Certification for State and Local Governments.

The DIR along with the Texas Cybersecurity Council certifies cybersecurity training programs annually based on specific standards and publishes a list of approved trainings that government agencies can choose from to complete the training requirements.

The City's Information Technology Services Department (ITSD) oversees and monitors cybersecurity training for eligible City of San Antonio employees through the KnowBe4 enterprise awareness training program, which is included on the approved DIR certified training list. KnowBe4 offers short online training modules monthly to all City employees with a COSA network and email account. ITSD tracks training completion each month to ensure that all employees finish the full cybersecurity training by the annual reporting deadline.

In addition, in accordance with Texas Government Code Section 2054.5191, the governing body of a local government shall verify and report on the completion of a cybersecurity training program by employees of the local government (performed by ITSD) and require periodic audits to ensure compliance with this section (performed by the Office of the City Auditor).

Audit Scope and Methodology

The audit scope was the State Security Training Reporting period of July 2023 through June 2024.

Testing criteria included Texas Government Code, Section 2054. We interviewed ITSD personnel and reviewed department policies and procedures to identify controls related to the City's Security Awareness Training Program.

We examined state requirements and confirmed that ITSD is implementing an approved Security Awareness Training Program. We reviewed the standard operating procedures to ensure they provide sufficient guidance for meeting state training requirements. Additionally, we verified that appropriate monitoring controls are in place to guarantee that all relevant City employees and elected officials are enrolled in and completing the security training. Furthermore, we received confirmation that ITSD management is actively involved in certifying the City's compliance with the security training requirements to the state by the specified deadline.

Key components and principles of internal control include activities such as utilizing the structured KnowBe4 training platform, ITSD's monitoring and reporting of incomplete training, and active management involvement in the annual certification process. We assessed each of these control activities during our procedural tests.

To validate that all relevant employees and elected officials were enrolled in the security training program, we relied on computer-processed data from the KnowBe4 Training Platform, SAP, and Active Directory. Our approach involved direct testing of this data rather than evaluating the overall and application controls of these systems. This testing included reviewing users in Active Directory, SAP, and KnowBe4. We do not believe that the lack of general and application controls testing impacted our audit results.

This performance audit was conducted in accordance with generally accepted government auditing standards, which require us to plan and execute the audit to gather sufficient, appropriate evidence for our findings and conclusions. We believe that the evidence collected provides a solid basis for our findings and conclusions based on our audit objectives.

Audit Results

ITSD submitted the certification on time and has established effective controls to ensure citywide compliance with state security training requirements. Specifically, ITSD administers a security awareness training program certified by the Texas Department of Information Resources (DIR) and has implemented policies and procedures to ensure timely completion of this program. Additionally, monitoring controls are in place to confirm that all relevant City employees and elected officials are enrolled in and complete the training. ITSD disables system access for individuals who fail to complete the training by the deadline. Moreover, ITSD has a process to ensure that the required self-certification is submitted to the State on time.

Appendix A – Staff Acknowledgement

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Javier Castillo, IT Auditor II, Auditor in Charge

Appendix B – Management Acknowledgement

CITY OF SAN ANTONIO

SAN ANTONIO TEXAS 78283-3966

September 20, 2024

Kevin W. Barthold, CPA, CIA, CISA
City Auditor
San Antonio, Texas

RE: Management's Acknowledgement of its Review of Information Technology Services Department
(ITSD) Security Awareness Training Program

ITSD has reviewed the audit report and provided its comments to the auditors. As there are no
recommendations for management, no management responses are required.

ITSD:

[X]   Fully Agrees

[ ]   Does Not Agree (provide detailed comments)

Sincerely,

R. Craig Hopkins Jr.   20 Sep 2024
Craig Hopkins   Date
Chief Information Officer
Information Technology Services Department

Ben Gorzell   9/20/24
Ben Gorzell   Date
Chief Financial Officer
City Manager's Office