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**CITY OF SAN ANTONIO**  
**OFFICE OF THE CITY AUDITOR**



Audit of Information Technology Services Department

Security Awareness Training Program - 2021

Project No. AU21-032

September 29, 2021

Kevin W. Barthold, CPA, CIA, CISA  
City Auditor

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## Executive Summary

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As an addition to our annual Audit Plan approved by City Council, we conducted an audit of the Information Technology Services Department (ITSD) Security Awareness Training Program to coincide with the annual reporting deadline mandated by state requirements. The audit objectives, conclusions, and recommendations follow:

**Determine if ITSD has adequate controls in place to facilitate citywide compliance with State of Texas security training requirements.**

We evaluated the Security Awareness Training Program and determined that ITSD has adequate controls to facilitate citywide compliance with State of Texas security training requirements. Specifically, ITSD has:

- Implemented policies and procedures to appropriately administer a certified security training program in accordance with state requirements.
- Developed controls to ensure completion of training by all applicable City employees and elected officials.
- Implemented processes to ensure completion and self-certification by the required state deadline.

ITSD Management's acknowledgement of audit results is in Appendix B on page 5.

# Table of Contents

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Executive Summary .....	i
Background.....	1
Audit Scope and Methodology .....	2
Audit Results.....	3
Appendix A – Staff Acknowledgement.....	4
Appendix B – Management Acknowledgement .....	5

## Background

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Texas Government Code, Section 2054, requires the Department of Information Resources (DIR) in consultation with the Texas Cybersecurity Council to certify at least five cybersecurity training programs and requires all governmental organizations to complete a certified training program. All local government employees who have access to a local government computer as well as all elected officials must complete a certified cybersecurity training program by June 14th every year. Local governments must also annually certify their training compliance by June 15th, using the Cybersecurity Training Certification for Local Governments web portal.

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) administers and monitors cybersecurity training for applicable employees and elected officials through the Moodle citywide training platform. The program selected by ITSD from the approved DIR training list is Mimecast. Mimecast is administered throughout the year in short monthly security modules to all City employees who have a network and email account. ITSD monitors trainings monthly to ensure all employees have completed the full cybersecurity training by the annual reporting deadline of June 14th.

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

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The audit scope was the State Security Training Reporting period of July 2020 – June 2021.

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 reviewed state requirements and ensured an approved Security Awareness Training Program was being administered by ITSD. We obtained standard operating procedures and verified they include adequate guidance to ensure completion of security training in accordance with state requirements. In addition, we verified that there are adequate monitoring controls in place to ensure all applicable City employees and elected officials are enrolled and completing the security training. Furthermore, we obtained confirmation that ITSD management is actively involved in certifying the City's completion of the security training to the state by the required deadline.

Significant internal control components and principles include control activities such as use of the structured Moodle training platform, ITSD monitoring and reporting of uncompleted trainings, and active management involvement in the annual certification process. We reviewed each control activity during our tests of procedures.

We relied on computer-processed data from the Moodle Training Platform, SAP, and Active Directory to validate that all applicable employees and elected officials were enrolled in the security training program. Our reliance was based on performing direct tests on the data rather than evaluating the systems' general and application controls. Our direct testing included reviewing users in Active Directory, SAP, and Moodle. We do not believe that the absence of testing general and application controls had an effect on the results of our audit.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

## Audit Results

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ITSD has adequate controls to facilitate citywide compliance with the State security training requirements. Specifically, ITSD continues to administer a security awareness training program certified by the Texas Department of Information Resources (DIR) and has policies and procedures implemented to ensure this program is completed in accordance with state requirements. Additionally, monitoring controls are in place to ensure all applicable City employees and elected officials are enrolled and complete the training. ITSD disables system access for those who do not complete the training by the required deadline. Furthermore, ITSD has a process in place to ensure the required self-certification is submitted to the State by the required deadline.

## **Appendix A – Staff Acknowledgement**

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Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager  
Daniel Kuntzelman, CIA, CISA, Auditor in Charge

## Appendix B – Management Acknowledgement

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**CITY OF SAN ANTONIO**

SAN ANTONIO TEXAS 78283-3966

September 16, 2021

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

RE: Management's Acknowledgement of its Review of ITSD Security Awareness Training Program Audit

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

Information Technology Services Department:

Fully Agrees

Does Not Agree (provide detailed comments)

Sincerely,

R. Craig Hopkins Jr.  
Craig Hopkins  
Chief Information Officer  
ITSD

16 Sep 2021

\_\_\_\_\_  
Date

Ben Gorzell  
Ben Gorzell  
Chief Financial Officer  
City Manager's Office

9/22/2021

\_\_\_\_\_  
Date