CITY OF SAN ANTONIO

P.O. Box 839966
SAN ANTONIO TEXAS 78283-3966

October 18, 2022

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Mayor

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Councilman, District 1

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Councilman, District 2

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Councilwoman, District 3

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Councilman, District 8

John Courage
Councilman, District 9

Clayton H. Perry
Councilman, District 10

SUBJECT: Audit Report of Information Technology Services Department (ITSD) Security Awareness Training Program

Mayor and Council Members:

We are pleased to send you the final report of the ITSD Security Awareness Training Program. This audit began in August 2022 and concluded in September 2022. Management's acknowledgment of audit results is included in Appendix B of the report. The ITSD management and staff should be commended for their cooperation and assistance during this audit.

The Office of the City Auditor is available to discuss this report with you individually at your convenience.

Respectfully Submitted,

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

Distribution:
Erik Walsh, City Manager
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Judy Treviño, Audit Committee Member

CITY OF SAN ANTONIO

OFFICE OF THE CITY AUDITOR

Audit of Information Technology Services Department

Security Awareness Training Program - 2022

Project No. AU22-025

October 18, 2022

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

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 Security Awareness. The audit objectives, conclusions, and recommendations follow:

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

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 awareness 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 acknowledgment of audit results is in Appendix B on page 5.

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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) administers and monitors cybersecurity training for the applicable City of San Antonio employees through the citywide training module, Moodle. The program selected by ITSD from the approved DIR training list is Mimecast. Mimecast is administered throughout the year in short monthly online training modules to all city employees who have a COSA network and email account. ITSD monitors the completion of trainings monthly to ensure all employees have completed the full cybersecurity training by the annual reporting deadline. In July 2022, ITSD selected a new training vendor to replace Mimecast and Moodle for the next Fiscal Year (2023). The new training program is called KnowBe4 and is on the approved DIR training list.

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 2021 through May 2022.

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 Mimecast 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

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

Mark Bigler, CPA-Utah, CISA, CFE, Audit Manager
Holly Williams, CISA, CRISC, Auditor in Charge

Appendix B – Management Acknowledgement

CITY OF SAN ANTONIO
SAN ANTONIO TEXAS 78283-3966

September 14, 2022

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 2022

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:

☒ Fully Agrees

☐ Does Not Agree (provide detailed comments)

Sincerely,

R. Craig Hopkins Jr.
Craig Hopkins
Chief Information Officer
Information Technology Services Department

29 Sep 2022
Date

Ben Gorzell
Chief Financial Officer
City Manager's Office

9/29/2022
Date