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**MICHAEL POST, C.P.A., M.B.A.**  
**HARRIS COUNTY AUDITOR**

October 21, 2020

Mr. David Berry  
Executive Director/County Budget Officer  
Budget Management Department  
1001 Preston St  
Houston, Texas 77002

MG Richard J. Noriega (Ret)  
Interim Executive Director & Chief  
Information Officer  
Universal Services Department  
406 Caroline, 4<sup>th</sup> Fl  
Houston, Texas 77002

Dear Mr. Berry and MG Noriega:

The Harris County Auditor's Office - Audit Division has completed an audit of Cybersecurity Training Compliance. The results of the engagement are included in the attached report.

We appreciate the time and attention provided by you and your staff during this engagement. Please anticipate an email request to complete the Audit Division's Post Engagement Survey. We look forward to your feedback. If you have any questions, please contact me or Errika Perkins, Chief Assistant at 713-274-5673.

Sincerely,

A handwritten signature in blue ink that reads "Michael Post".

Michael Post  
County Auditor

Attachment

Report Copies:

District Judges  
County Judge Lina Hidalgo  
Commissioners:  
    R. Jack Cagle  
    Rodney Ellis  
    Adrian Garcia  
    Steve Radack  
Vince Ryan  
James Henderson  
John Dyess

Ed Gonzalez  
Mark Herman  
Ted Heap  
Phil Sandlin  
Mark Pierce  
Chris Hollins  
Shain Carrizal  
Jesse Dickerman  
Frank Bruce

AUDIT REPORT

# Cybersecurity Training Compliance

OCTOBER 21, 2020

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## Executive Summary

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### OVERALL CONCLUSION

Harris County (County) was generally in compliance with Texas Government Code 2054.519 to report on cybersecurity training by the June 15 deadline. Over 90% of County employees completed the required training.

The audit identified some opportunities for improvement for management's consideration.

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### SCOPE AND OBJECTIVE

The objective of the engagement was to fulfill the statutory audit requirement of Texas Government Code 2054.519, State Certified Cybersecurity Training Programs (recently enacted with Texas H.B. 3834) and to review the County's compliance with the additional requirements. The procedures evaluated compliance with the following requirements:

- Annually, local government employees who have access to a local government computer system or database must complete a certified cybersecurity training program and,
- The local government must verify and report on the compliance of the program.

The audit evaluated compliance for eligible County employees. To determine eligibility, employees who were newly hired, on leave of absence, or who had left the County during the period of April 15 to June 30, 2020, were excluded from the results.

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### SUMMARY OF AUDIT ISSUES

- The margin of non-compliance was greater than anticipated.

The audit issue, management's action plan to address the issue, and background information regarding this audit are discussed in more detail on the following pages.

## AUDIT ISSUE

### **ISSUE #1: The margin of non-compliance was greater than anticipated.**

**What is the Issue:** Approximately 1,700 (9.5%) of required employees and eight (8) elected officials did not complete the cybersecurity training requirement.

**What is Expected:** Texas House Bill (H.B.) 3834 requires local government employees, including elected officials, with access to County networks and systems to annually complete an approved certified cybersecurity training program.

**Why it Matters:** Non-compliance with the law increases the County's vulnerability to cybersecurity threats as employees and officials may not recognize threats or understand their role in protecting the County.

**Why it Happened:** While individual departments may opt to obtain training differently, the County is responsible for ensuring compliance. When the County submitted its certification, it included the disclaimer: "Harris County has deployed a certified training program and has made extraordinary efforts."

However, the margin of non-compliance was greater than anticipated. The Sheriff's Office used the Criminal Justice Information System's (CJIS) records to identify individuals subject to the required training. Approximately 900 employees were not identified by the Sheriff's Office because they had not been entered into CJIS and did not appear on the CJIS report. The department has subsequently worked to get these employees trained.

#### **What Actions(s) are Suggested:**

- 1) The County should require new hires to complete cybersecurity training within 60 days of hire; this would ensure that all employees receive training promptly.
- 2) The County should require that departments perform a semi-annual cybersecurity training review using independent employee records as the foundation for ensuring compliance; this would encourage departments to review and correct any compliance deficiencies.

### **MANAGEMENT'S ACTION PLAN**

#### **Responsible Party: Erika Owens**

Agreed. Human Resources & Risk Management (HRRM) and Universal Services (US) note the percentage of completion for Harris County Departments that utilized the certified training program deployed by US was 93.8%. HRRM will continue to work with US, the County Attorney's Office, and all County Departments to make available annual cybersecurity training to every County employee and elected official in departments that have not opted-out of the US-provided training. US will ensure applicable new hires are added to the Learning Management System and assigned the training within 60 days of the creation of the employee's account in Harris County Access Manager (HCAM). Also, HRRM and US will work with County departments to ensure that all employees with outstanding needing cybersecurity training are identified on a quarterly basis beginning November 1, 2020. We will continue to employ extraordinary efforts to comply with the regulations and decrease the margin of non-compliance.

**Due Date:** November 1, 2020.

## BACKGROUND

Most County departments utilized the training program that was designed and delivered by Universal Services.

Six departments opted to obtain training independent of Universal Services:

Department	Certified Cybersecurity Training Program
Toll Road Authority (HCTRA)	KnowBe4
County Clerk's Office	Texas Association of Counties
Constable Precinct 4	Criminal Justice Information Services (CJIS)
Constable Precinct 5	CJIS
Constable Precinct 8	CJIS
Sheriff's Office	CJIS

Harris County Human Resources and Risk Management obtained evidence of training from Universal Services and the individual departments. HRRM then certified on the County's behalf via an online portal with the Texas Department of Information Resources as authorized by Commissioner's Court on February 25, 2020, agenda item 7(a).

## ACCOUNTABILITY

The work performed required our staff to exercise professional judgment in completing the scope procedures. As the procedures were not a detailed examination of all transactions, there is a risk that fraud, errors, or omissions were not detected during this engagement. The official, therefore, retains the responsibility for the accuracy and completeness of their financial records and for ensuring sufficient controls are in place to detect and prevent fraud, errors, or omissions.