February 4, 2021

EVALUATION OF INFORMATION TECHNOLOGY SECURITY – STATUS REPORT

Members of the Legislative Audit Committee:

Attached is the status report from the Governor's Office of Information Technology (OIT) on the implementation of recommendations contained in the Office of the State Auditor's (OSA) *IT Performance Evaluation of Information Technology Security, at the Colorado Department of Transportation, Public Report.*

OSA REVIEW OF DOCUMENTATION

As part of the status report process, we requested and received supporting documentation for each recommendation that OIT reported in the original audit report as having been implemented or partially implemented, as of the end of August 2020. Specifically, we reviewed the following documentation and included the date that we were able to substantiate each recommendation as follows:

- Recommendation 2A: An OIT document entitled, *OIT Consolidated Agencies Contractor Information Security Training Solution*, which includes procurement, vendor award, testing, and security training site information to include a description of the contract users who should use the training portal. (Substantiated in January 2021)

- Recommendation 2B: Email communications and a transcript of the Colorado Information Security Policy Overview Training to help improve access controls to the Colorado Department of Transportation's (CDOT) systems. (Substantiated in December 2020)

- Recommendation 2C: Communication regarding the OIT executive staff approval of an OIT Business Operating Procedure that establishes and enforces sanctions on individuals who do not complete security awareness training in a timely manner. The procedure also implemented a formal sanction process for individuals failing to comply with established information security policies and procedures. (Substantiated in January 2021)

Based on our review, the supporting documentation substantiates OIT's reported implementation status.

COLORADO
Chief Information Officer &
Executive Director
Governor's Office of Information Technology

Anthony Neal-Graves (Interim)
601 East 18th Avenue, Suite 130
Denver, CO 80203

September 4, 2020

Dianne E. Ray, CPA
State Auditor
Colorado Office of the State Auditor
1525 Sherman St., 7th Floor
Denver, CO 80203

Dear Auditor Ray:

In response to your request, regarding the CDOT Security Audit recommendations, OIT prepared the attached status report. The report provides a brief explanation of the actions taken by the Governor's Office of Information Technology and the implementation status of each recommendation.

OIT implemented applicable security controls using generally accepted auditing standards. Despite obstacles resulting from the COVID-19 pandemic, OIT worked diligently to remediate findings as we take audit findings seriously. OIT will continue to prioritize these findings by ensuring adequate resources are provided.

If you have any questions about this status report and the Governor's Office of Information Technology efforts to implement the audit recommendations, please contact Deborah Blyth, CISO at 303-764-7994 or deborah.blyth@state.co.us.

Sincerely,

Anthony Neal-Graves
Chief Information Officer and Executive Director (Interim)

Attachments: 3

cc: Deborah Blyth, CISO

EVALUATION RECOMMENDATION STATUS REPORT

EVALUATION NAME	*Evaluation of Information Technology Security at the Colorado Department of Transportation – PUBLIC Report*
EVALUATION NUMBER	1926P-IT
AGENCY	Governor's Office of Information Technology
DATE OF STATUS REPORT	01/08/2021

SECTION I: SUMMARY

REC. NUMBER	AGENCY'S RESPONSE	ORIGINAL IMPLEMENTATION DATE	CURRENT IMPLEMENTATION STATUS (AS OF 8/31/2020)	CURRENT IMPLEMENTATION DATE (AS OF 8/31/2020)
2A	Agree	August 2020	Partially Implemented	10/2020
2B	Agree	December 2020	Partially Implemented	12/2020
2C	Agree	December 2020	Partially Implemented	12/2020
2D	Agree	September 2020	Not Implemented	12/2020

SECTION II: NARRATIVE DETAIL

RECOMMENDATION 2A			
The Governor's Office of Information Technology (OIT) should improve access control to CDOT systems by:			
A. Collaborating with CDOT to establish a program for the management of contractors with access to CDOT systems and data. The information from this program should then be used to ensure compliance with organizational requirements for security training and awareness.			
CURRENT IMPLEMENTATION STATUS	Partially Implemented	CURRENT IMPLEMENTATION DATE	10/2020
AGENCY UPDATE			

Partially Implemented as of 8/31/2020. OIT has created the training content, the training portal, as well as a fact sheet for contractors to reference regarding the training. This has been shared to all consolidated agencies including the Department of Transportation. There were several steps taken by OIT from 01/2020 up until the fully implemented date of 10/1/2020. Some of these steps include:

*January 28 - OIT subject matter expert (SME) met with procurement and drafted a documented quote (DQ) for the purpose of procuring a system to utilize for contractor training.
*February 10-13 posted DQ request through OIT procurement.
*February 19 reviewed and evaluated the responses and determined the Center for Information Security Awareness (CFISA) best fit our needs.
*February 20, awarded the DQ to CFISA and met with OIT procurement to create PO for the award.
* July, the contract and PO is for FY21-23 funding, so we began working with CFISA on this solution in July 2020.

The Governor's Office of Information Technology (OIT) has fully implemented this finding as of 10/2/2020. Specifically, between 8/31/2020 and 10/2/2020, OIT tested, finalized, and rolled out the completed training to the Colorado Department of Transportation and other agencies.

RECOMMENDATION 2B			
The Governor's Office of Information Technology (OIT) should improve access control to CDOT systems by:			
B. Developing role-based training for all individuals that have specific roles and responsibilities outlined within organizational information security policies.			
CURRENT IMPLEMENTATION STATUS	Partially Implemented	CURRENT IMPLEMENTATION DATE	12/2020
AGENCY UPDATE			

The Governor's Office of Information Technology (OIT) has partially implemented this finding, as of 8/31/2020. OIT has developed the Information Security Policy Training. Between 8/31/2020 and 12/31/2020, OIT continued to work toward full implementation by meeting with CDOT to present the training materials and CDOT added the training to their own system, as well as providing support to CDOT in providing this training to their employees who perform IT-related functions.

RECOMMENDATION 2C			
The Governor's Office of Information Technology (OIT) should improve access control to CDOT systems by:			
C. Establishing and enforcing sanctions for individuals who do not complete security awareness training in a timely manner and working with CDOT to implement the formal sanctions process for individuals failing to comply with established information security policies and procedures.			
CURRENT IMPLEMENTATION STATUS	Partially Implemented	CURRENT IMPLEMENTATION DATE	12/2020
AGENCY UPDATE			
The Governor's Office of Information Technology (OIT) has partially implemented this finding. OIT has created a Policy that establishes sanctions for employees who do not complete security awareness training in a timely manner. OIT with work with the Colorado Department of Transportation (CDOT) to make recommendations and implement a similar policy at the department. This will be completed by the original implementation date of December 2020.			

RECOMMENDATION 2D			
The Governor's Office of Information Technology (OIT) should improve access control to CDOT systems by:			
D. Conducting regular, practical exercises in security awareness training that simulate actual cyber-attacks (e.g. performing email phishing of users regularly).			
CURRENT IMPLEMENTATION STATUS	Not Implemented	CURRENT IMPLEMENTATION DATE	12/2020
AGENCY UPDATE			
The Governor's Office of Information Technology (OIT) has not implemented the finding. Due to Covid19 disruptions and delays, the full implementation of this finding will be completed no later than December 2020.			