



Texas Health and Human Services Office of Inspector General Audit and Inspections Division

Follow-Up Assessment on Previously Issued Audit Recommendations

Security Controls Over Confidential HHS System Information at El Paso Health
AUD-23-010

July 14, 2023

Dear Carol Smallwood:

The Texas Health and Human Services (HHS) Office of Inspector General Audit and Inspections Division (OIG Audit) conducted a follow-up assessment of the previously issued audit report titled "Security Controls Over Confidential HHS System Information: El Paso Health" to determine the implementation status of audit recommendations previously issued by OIG Audit.

Based on the results of our assessment, OIG Audit determined that El Paso Health fully implemented all reported audit recommendations. As a result, OIG Audit did not reissue any recommendations from the previous audit. OIG Audit communicated less-significant observations to El Paso Health in a separate written communication.

OIG Audit thanks management at El Paso Health for their responsiveness, cooperation, and assistance during this assessment. The attachment to this letter contains additional details on the assessment.

Sincerely,

Kacy J. VerColen, CPA, CIGA
Chief of Audit and Inspections

Attachment

cc: Cecile Erwin Young, HHS Executive Commissioner
Sylvia Hernandez Kauffman, HHS Inspector General

Background

The previously issued audit report was published on April 24, 2020. The objectives of the original audit were to assess the design and effectiveness of (a) selected security controls over confidential HHS System information stored and processed by El Paso Health and (b) the business continuity and disaster recovery planning for selected activities related to the delivery of managed care services to Texas Medicaid and Children's Health Insurance Program (CHIP) members enrolled with El Paso Health.




The scope of the original audit was state fiscal year 2019, which covered the period from September 1, 2018, through August 31, 2019.

Attachment

Figure 1 summarizes the implementation status of the recommendations included in the previously issued audit report, "Security Controls Over Confidential HHS System Information: El Paso Health," [AUD-20-009](#), issued April 24, 2020.

A fully implemented recommendation was successfully implemented by El Paso Health using a process, system, or policy.

Figure 1: Implementation Status of Audit Recommendations to El Paso Health

	Implementation Status	Recommendation
	Fully Implemented	1 El Paso Health should take appropriate action to address the inactive account and ensure access for terminated employees is disabled in accordance with IS-Controls requirements.
	Fully Implemented	2 El Paso Health should establish and document baseline configurations for servers and any other network devices that store and process confidential HHS System information.
	Fully Implemented	3 El Paso Health should document procedures for the sanitization of media and the destruction of confidential HHS information.

Source: OIG Audit

Through its implementation of the audit recommendations, El Paso Health more effectively (a) protected confidential HHS information and (b) reduced its risk of noncompliance.

Objective, Scope, Methodology, Criteria, and Standards

Objective and Scope

The objective of this follow-up assessment was to determine the implementation status of OIG Audit's previously issued recommendations to El Paso Health, which included testing the effectiveness of management activities designed to remediate identified recommendations.

The scope of the assessment was limited to reviewing the implementation status of recommendations identified in the previously issued audit report.

Methodology

OIG Audit issued an engagement letter to El Paso Health on April 19, 2023, providing information about the upcoming assessment, and conducted testing from April 19, 2023, through May 30, 2023.

OIG Audit reviewed the previously issued audit report and performed a follow-up assessment of the reported findings, recommendations, and management responses.

Data Reliability

OIG Audit assessed the reliability of El Paso Health's user account data by reviewing parameters of reports El Paso Health provided, tracing user information to El Paso Health human resources reports, and interviewing relevant El Paso Health personnel knowledgeable about the systems and data. OIG Audit determined that the data was sufficiently reliable for the purposes of this assessment.

Testing Methodology

To determine the effectiveness of the implemented audit recommendations, OIG Audit:

- Examined user account access to El Paso Health's internal network and claims management systems.
- Determined whether access to El Paso Health's systems was limited to active users.
- Reviewed El Paso Health's policies and procedures relevant to the audit recommendations.

OIG Audit collected information for this assessment through interviews and electronic communications with El Paso Health management. Auditors assessed the effectiveness of management activities designed to remediate the findings from the original report and conducted testing for recommendations El Paso Health management asserted had been fully implemented.

Criteria

OIG Audit used the following criteria to evaluate the information provided:

- HHS Information Security Controls (IS-Controls), v. 1.0 (2018) through v. 1.2.2 (2021)
- El Paso Health Policy and Procedure, "Changes in User Access or Rights," Policy no. MIS 1.4 (2017)
- El Paso Health Policy and Procedure, "Physical Safeguards Device and Media Controls," Policy no. MIS 4.9 (2017)
- El Paso Health Standard Operating Procedure, "Electronic Media Destruction," Policy no. MIS SOP 1.1 (2019 through 2020)
- El Paso Health, *Disaster Recovery Plan*, § 14, v. 17.0 (2020) and v. 18.0 (2022)

Auditing Standards

Generally Accepted Government Auditing Standards

OIG Audit conducted the original audit in accordance with generally accepted government auditing standards (GAGAS) and performed the work in accordance with the IT Standards, Guidelines, and Tools as well as the Techniques for Audit and Assurance and Control Professionals published by ISACA (formerly known as the Information Systems Audit and Control Association).

In accordance with GAGAS, providing audit, investigative, and oversight-related services—such as periodic audit recommendation follow-up engagements and reports—does not involve a GAGAS engagement. OIG Audit planned and performed this follow-up assessment to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions included in this report based on the assessment objectives.