



TEXAS HIGHER EDUCATION COORDINATING BOARD

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December 10, 2018

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Dr. Raymund A. Paredes
Commissioner of Higher Education
1200 E. Anderson Lane
Austin, TX 78752

Dear Dr. Paredes:

The Texas Higher Education Coordinating Board implemented two of the three outstanding audit recommendations from the Audit of Data Administration and Governance report issued May 25, 2017.

Management implemented audit recommendations by:

- Creating a quarterly process to scan a network folder with agency-wide access for improperly stored sensitive information, and working with program staff to remediate any files identified during the scan.
- Updating Security Awareness Training to provide detailed information of the types of information and files that should not be stored on the network folder with agency-wide access.
- Implementing a process to educate program staff on agency-wide risk assessment activities, which include identifying data owners, and documenting information system applications.

Management reported the following four-part recommendation, originally scheduled for implementation in November/December 2017, as currently in progress:

1. Develop and implement a process to help the data owners monitor records retention in their areas of responsibility.
2. Better define the records retention responsibilities of the Operations Manager.
3. Coordinate with data owners to reduce cost of storage by retaining data appropriately in different Tiers.¹
4. Revise the record retention policy to reduce storage costs, and to mitigate risks from possible data breach.

During follow-up work, we identified some areas of clarification regarding the records retention manager and identified an updated implementation date of October 2019.

Recommendation:

Ensure records retention manager duties are clearly defined and the records retention manager assists with the development of policies and procedures. Work with the program area and ISS to ensure data is classified into the correct tiers for optimum cost savings.

¹ This part of the recommendation is stated to have been implemented by 09/01/2017.

Management Response:

To implement the recommendations provided by the internal audit report, management has established a Records Retention Committee comprised of representatives from every division and department. The committee has been charged with developing an agency policy and procedures relating to records retention to reduce storage costs and to mitigate risks from possible data breach. The committee will also develop and implement a process to help data owners monitor records retention in their areas of their respective division/department on an ongoing basis. The role of the Records Management Officer has been redefined as the coordinator for the committee to acknowledge that records retention is a shared responsibility of every division and department, and to take into account the lack of resources that prohibits the agency from dedicating a full-time FTE to oversee agency-wide compliance with records retention. Management has also declared December 17-21, 2018 as Records Retention Clean-Up Week to allow employees sufficient time to clean up their records in accordance with the agency's Records Retention Schedule. An agency-wide announcement with supporting materials was sent on November 21 in preparation of Clean Up Week. Management will also present this information to employees at the agency-wide meeting scheduled for December 10.

We conducted this follow-up audit in conformance with the International Standards for the Professional Practice of Internal Auditing and in accordance with the Generally Accepted Government Auditing Standards (GAGAS).

If you have any questions or comments, please let me know.

Sincerely,



Mark A. Poehl, CPA, CIA, CISA, CFE
Director, Internal Audit and Compliance
cc:

THECB

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