

24-106 Data Consortiums/Repositories

EXECUTIVE SUMMARY

Auditing & Advisory Services (A&AS) has completed an assurance engagement of data consortiums/repositories. This engagement was performed at the request of the UTHealth Houston (UTHealth) Audit Committee and was conducted in accordance with the Global Internal Audit Standards.

Background

UTHealth is a participant or participant/custodian in a number of data consortiums and repositories including the Center for Healthcare Development (includes the Texas All-Payer Claims Database), UT System Health Intelligence Platform (UT-HIP), Clinical Data Warehouse (CDW), and the BigMouth Data Dental Repository (BigMouth).

Objectives/Scope

Our objective was to determine whether governance around data consortiums/repositories is adequate. Specifically, we performed the following:

- Gained an understanding of processes and requirements by reviewing policies, procedures, and available committee information.
- Conducted interviews with responsible individuals from the following departments/schools:
 - Information Technology
 - Information Technology Security
 - Legal Affairs
 - McGovern Medical School
- Compiled a list of data consortiums/repositories based on information gathered and interviews conducted.

Scope Period

Data consortiums/repositories as of June 30, 2024

Conclusion

Based on information gathered and interviews conducted, we noted the following opportunity for improvement:

#	Observation Summary	Risk	Risk Rating
1	A governance framework over data consortiums/repositories (where UTHealth serves as custodian) has not been formally established.	Inconsistent and/or ineffective risk management.	High

OBSERVATIONS & MANAGEMENT RESPONSES

#1 - Governance

Cause

A governance framework over data consortiums/repositories (where UTHealth serves as custodian) has not been formally established.

Risk

Inconsistent and/or ineffective risk management.

Condition

Although no charters or bylaws exist, management informed us:

- The Data Advisory Committee (DAC) is a cross-campus faculty advisory committee that leverages data in order to drive UTHealth’s strategic plan.
- The DAC has no dedicated personnel or budget.
- The Data Agreements Review Committee (DARC) is a subcommittee of the DAC and reviews unique/unusual data sharing proposals (from both nonprofit and for-profit entities) and advises senior management on whether to enter into agreements.

We noted the following regarding data consortiums/repositories (where UTHealth serves as custodian):

- The DAC and DARC have not been formally constituted and have no oversight of data consortiums/repositories.
- There is no current, centralized inventory of data consortiums/repositories.
- Institutional policies and procedures that specifically address data consortiums/repositories have not been established. Additionally, there are no clearly defined roles and responsibilities for establishing a new data consortium/repository.

Criteria

Although there are no specific institutional policies and procedures around data consortiums/repositories, the following relate to protection of data where UTHealth serves as custodian:

ITPOL-004 Access Control Policy states it is the policy of UTHealth to control access to all information systems in accordance with an appropriate policy, to prevent unauthorized logical access, to review access control policies regularly, and to use appropriate security controls to control access including robust identification and authentication techniques.

ITPOL-006 Host Configuration Policy requires that all systems participating on the data network meet security zone requirements and do not pose a threat to other network-connected systems, internally or externally.

ITPOL-009 Network Security Policy establishes security requirements to ensure that the exchange of confidential and sensitive information among computing systems via connected data networks is secure as required by the Information Security Program.

ITPOL-039 Cloud Computing Policy University states that data stored or processed in the cloud is still university data and is subject to all policies, standards, and guidelines governing university data.

24-106 Data Consortia/Repositories

Recommendation(s)

Review current processes and practices around data consortia/repositories (where UTHealth serves as custodian). Develop and implement a governance framework that addresses key components such as ownership, stakeholders, roles and responsibilities, security assessments, incident escalation, compliance, and any other areas deemed significant by management.

Rating

High

Management Response

HOOP 175 Roles and Responsibilities for University Information Resources and University Data (HOOP 175) currently serves as a definitive policy regarding the expectations and requirements of UTHealth System Owners which include key components such as roles and responsibilities, security assessments, incident escalations, and compliance. While data consortia are not specifically listed in HOOP 175, they are inherently included by their function. To ensure that there is clarity in the inclusion of data consortia in the policy requirements, we will work with Legal to revise HOOP 175 to include a specific notation for data consortia where UTHealth is responsible for direct management of the data. Under the direction of the designated UTHealth Data Management Officer, we will also define and implement a governance framework that includes tracking of all data consortia/repositories where UTHealth serves as a custodian.

Responsible Party

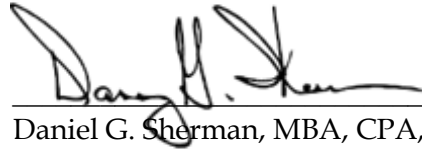
Mary Dickerson, Associate Vice President and Chief Information Security Officer
Bassel Choucair, Deputy Chief Information Officer and Data Management Officer

Implementation Date

March 15, 2025

24-106 Data Consortiums/Repositories

We would like to thank Information Technology, Information Technology Security, Legal Affairs, and McGovern Medical School staff and management who assisted us during the engagement.



Daniel G. Sherman, MBA, CPA, CIA
Vice President & Chief Audit Officer

OBSERVATION RATINGS

Priority	An issue that, if not addressed timely, has a high probability to directly impact achievement of a strategic or important operational objective of UTHealth Houston or the UT System as a whole.
High	An issue considered to have a medium to high probability of adverse effects to a significant office or business process or to UTHealth Houston as a whole.
Medium	An issue considered to have a low to medium probability of adverse effects to an office or business process or to UTHealth Houston as a whole.
Low	An issue considered to have minimal probability of adverse effects to an office or business process or to UTHealth Houston as a whole.

NUMBER OF PRIORITY OBSERVATIONS REPORTED TO UT SYSTEM

None

MAPPING TO A&AS FY24 RISK ASSESSMENT

Reference	Risk
FIN-7	UTHealth is responsible for breach costs for other institutional records that we are custodian for.

DATA ANALYTICS UTILIZED

Not applicable

ENGAGEMENT TEAM

VP/CAO - Daniel G. Sherman, MBA, CPA, CIA
Supervisor - Brook Syers, CPA, CIA, CFE, CISA
Staff - Ricky Phan

END OF FIELDWORK DATE

July 29, 2024

ISSUE DATE

September 10, 2024

REPORT DISTRIBUTION

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