Building Access Security

Facilities Services

August 2020
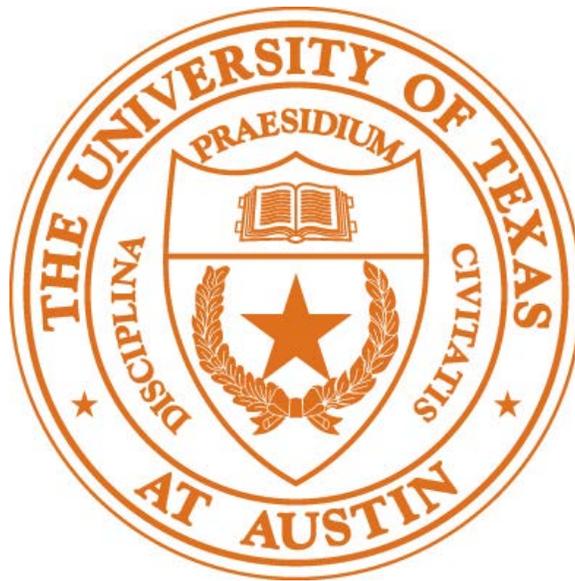
The University of Texas at Austin
Office of Internal Audits
UTA 2.302
(512) 471-7117

August 21, 2020

Interim President Jay C. Hartzell
The University of Texas at Austin
Office of the President
P.O. Box T
Austin, Texas 78713

Dear Interim President Hartzell,

We have completed our audit of Building Access Security, as part of our Fiscal Year 2019 Audit Plan. The objective of the audit was to determine whether building access security over tunnels and key replacement, return, and disposal are effective. The report is attached for your review.

Overall, the widespread use of physical keys, inaccurate key management records, and outdated policies and procedures result in weaknesses in building access security at The University of Texas at Austin (UT Austin).

Management has provided action plans to enhance controls. If you have any questions, please contact me at sandy.jansen@austin.utexas.edu.

Sincerely,

Sandy Jansen, CIA, CCSA, CRMA
Chief Audit Executive

cc: Mr. Darrell Bazzell, Senior Vice President and Chief Financial Officer
        Mr. David Darling, Associate Vice President, Facilities Planning and Management
        Mr. Carlos Martinez, Chief of Staff, Office of the President
        Ms. Amy Reyna, Assistant to Senior Vice President and Chief Financial Office
        Ms. Tara Trower, Chief of Staff, Financial and Administrative Services

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Facilities Services
Project Number: 19.009

Audit Objective
The objective of this audit was to determine whether building access security over tunnels and key replacement, return, and disposal are effective.

Conclusion
Overall, the widespread use of physical metal keys, inaccurate key management records, and outdated policies and procedures result in weaknesses in building access security at The University of Texas at Austin (UT Austin).

Audit Observations[1]		
Recommendations	Risk Level	Estimated Implementation Date
Improve Records Management	High	June 2021
Require Key Return	High	February 2021

Engagement Team
Autumn Gray, CIA, Auditor III
Erika Lobsinger, Auditor I
Brandon Morales, Audit Manager, CISA, CGAP

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[1] Each observation has been ranked according to The University of Texas System Administration (UT System) Audit Risk Ranking guidelines. Please see the last page of the report for ranking definitions.

Audit Results

The widespread use of physical metal keys, inaccurate key management records, and outdated policies and procedures result in weaknesses in building access security at UT Austin. Since the start of this audit, a new and more robust Key Control and Accountability Policy has been added to UT Austin's Handbook of Operating Procedures. Management should continue to prioritize standard operating procedures for keys and ensure that each of the eight key issuing authorities[2] document procedures regarding keys in each of their individual areas. Testing indicated that tunnel access was secure, but because of the unique risks associated with tunnels, additional documentation should be included to address these risks within the key issuing authority's procedures.

Installation and maintenance of an electronic Building Access Control System (BACS) on all doors across campus is cost prohibitive; therefore, UT Austin relies on the use of physical metal keys to secure buildings and other facilities defined in the Key Control and Accountability Policy. Management has not allocated resources to strengthen physical key management controls and has not established consequences when employees or departments lose or fail to return keys. The following recommendations on records management, key return, and key recycling will strengthen controls and improve overall building access security.

Observation #1 Records Management System
Audit Issue Ranking: High

Seventy-three percent of individuals listed as active key holders in the 30 high-risk areas selected for review did not have an active EID in Workday as of January 10, 2020. These individuals account for 26,158 unreturned keys. In addition, former employees are listed as current authorized key signers. Several employees separated more than a year ago. Furthermore, Lock and Key Services records indicate there are active key holders who were issued keys as far back as 1934.

Lock and Key Services does not maintain accurate records of current key holders or authorized key signers. Additionally, Lock and Key Services does not have access to Human Resource records that may allow key management records to be updated timely.

Recommendation: Lock and Key Services should:
- Reconcile active employees to current key holders on a periodic basis to ensure that key holder records reflect only active employees.
- Reconcile current departmental employees to current key holders by requiring departments to verify the accuracy of key holder records. This should be done on a periodic basis.

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[2] Key Issuing Authority – A department or unit authorized by the Key Control and Accountability policy, or by letter signed by the SVP/CFO, to manufacture and issue University keys to individual key holders for certain, specified areas of the University (i.e., certain sites, buildings, facilities, structures, spaces, or land areas). Key issuing authorities are responsible for developing written procedures to ensure proper control and accountability of the University keys issued under their authority.

Management's Corrective Action Plan: While acknowledging that key holder records need to be improved, Lock and Key Services lacks the authority to implement the recommendationd as stated. To improve the records management system, the following steps will be taken:

1. Implement the recently approved Key Control and Accountability Policy, HOP 4-1020, and the associated Procedures Manual. Part of this implementation will include the establishment of the Key Control Advisory Group made up of senior leaders including leaders from the Provost's Office, UTPD, Facilities Planning and Management, and an academic unit representative.
2. Facilities Services, as a university key issuing authority, will collaboratively develop an internal key holder audit procedure for the 300+ units that they support to addresses records management deficiencies identified in this audit. Human Resources and the Dean of Students will assist in the development of the procedures. Facilities Services will provide units audit training/assistance and make necessary updates to the key database. Facilities Services will also develop a process to hold these units accountable for their audits.
3. Facilities Services will audit other key issuing authorities on campus to verify compliance with HOP 4-1020 Key Control and Accountability Policy and their approved Procedures Manual.
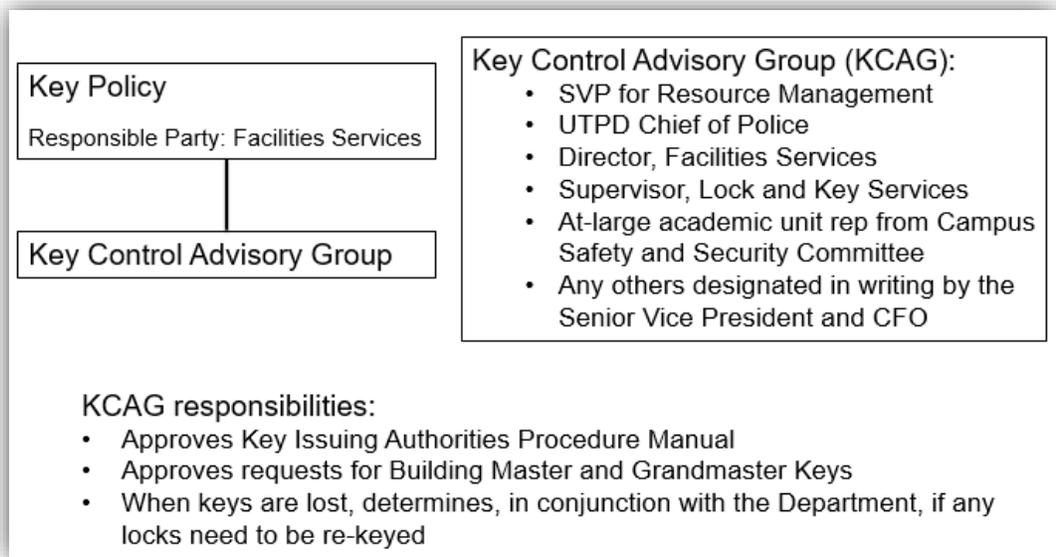
Responsible Person: Director of Facilities Services

Planned Implementation Date: June 2021

Observation #2 Key Return
Audit Issue Ranking: High

UT Austin does not emphasize the importance of key return, enforce consequences for unreturned keys, or require completion of exit procedures. As a result, individuals leaving UT Austin or transferring to another department fail to return keys or simply hand off keys to their successors.

Individuals with inactive EIDs account for the following unreturned keys[3]:
- 26,158 (or 67 percent) room/office keys
- 1,345 (or 52 percent) great grandmaster, grandmaster, master, and sub-master keys

Without the prioritization of key return, UT Austin cannot maintain effective building access security controls, and Lock & Key Services is unable to maintain accurate key records. Additionally, individuals who have separated or transferred departments and no longer require key access may have unauthorized access.

Recommendation: Management should implement exit procedures that require key return.

Management's Corrective Action Plan: The recently approved Key Control and Accountability Policy, HOP 4-1020, addresses the importance of key return indicating that failure to return keys may result in administrative disciplinary action.

The policy assigns eight departments/units as Key Issuing Authorities (Facilities Services/Lock and Key Services, University Housing and Dining, Applied Research Lab, Lady Bird Johnson Wildflower Center, Texas Exes, UT Golf Club, Marine Science Institute, and the McDonald Observatory). According to the policy, "Key issuing authorities shall develop and implement written procedures that ensure appropriate control and accountability of University keys issued under their authority. These procedures shall be approved by the Key Control Advisory Group." Therefore, the following steps will be taken:

1. Implement the recently approved Key Control and Accountability Policy, HOP 4-1020, and the associated Procedures Manual. Part of this implementation will include the establishment of the Key Control Advisory Group made up of senior leaders including leaders from the Provost's Office, UTPD, Facilities Planning and Management, and an academic unit representative.
2. Key issuing authorities will develop written procedures that ensure appropriate control and accountability of University keys issued under their authority.
3. The Key Control Advisory Group will approve the written procedures, in consultation with Human Resources and Dean of Students, as appropriate.

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[3] Keys that should have been returned from key holders in the 30 high-risk areas selected for review.
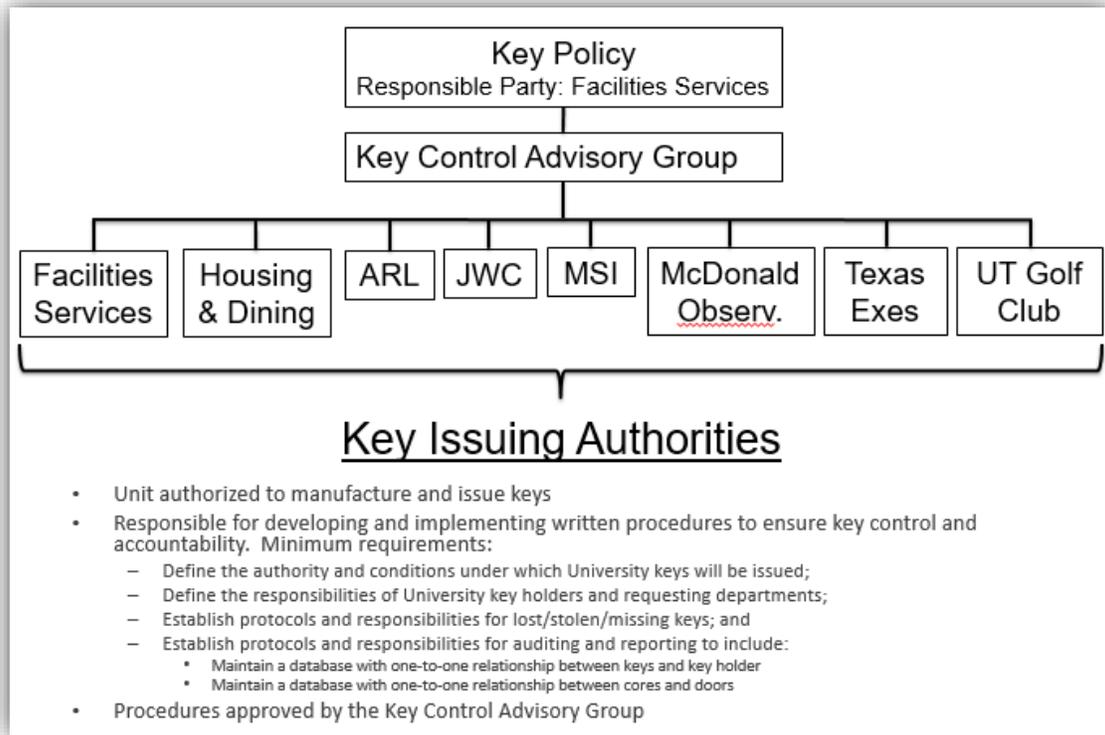
Responsible Person: Director of Facilities Services

Planned Implementation Date: February 2021

Background

The types of access security controls used on UT Austin's main campus, J.J. Pickle Research Center (PRC), and other UT Austin properties include electronic key control systems using access control cards, physical metal keys, keypads, and biometrics. Multiple offices are responsible for providing a secure environment for the university's students, faculty, and staff. Those offices include Facilities Services, the ID Center, Information Technology Services, Utilities and Energy Management, and UT Austin police. However, Lock & Key Services is primarily responsible for producing, issuing, and maintaining records for physical metal keys for most areas on the UT Austin main campus.

Scope, Objectives, and Methodology

The scope of this review includes policies, procedures, and controls related to tunnels and key replacement, return, and disposal as of September 1, 2019. For this audit, a judgmental sample of 30 high-risk areas were selected for review across the main campus and J.J. Pickle Research Center (PRC). Tunnel access controls were specifically included per management request.

Specific audit objectives included determining whether:

- Controls over key replacement and return exist and work as intended
- Keys are appropriately disposed of and prevent access to unauthorized individuals
- Tunnels access is limited to authorized individuals only

To achieve these objectives, the Office of Internal Audits:

- Interviewed staff regarding building access security, key controls, and tunnel access
- Benchmarked the draft key control and accountability policy and Lock and Key Services procedure manual against best practices
- Judgmentally selected a sample of high-risk areas on UT Austin's main campus and PRC to:
  o Test processes for granting and terminating access for vendors, contractors, and visitors
  o Use data analytics to determine whether key holder records accurately indicated that only current employees are active key holders
- Randomly selected a sample of tunnel gates and doors and conducted walkthroughs to verify access controls

Observation Risk Ranking

Audit observations are ranked according to the following definitions, consistent with UT System Audit Office guidance.

Risk Level	Definition
Priority	If not addressed immediately, has a high probability to directly impact achievement of a strategic or important operational objective of UT Austin or the UT System as a whole.
High	Considered to have a medium to high probability of adverse effects to UT Austin either as a whole or to a significant college/school/unit level.
Medium	Considered to have a low to medium probability of adverse effects to UT Austin either as a whole or to a college/school/unit level.
Low	Considered to have minimal probability of adverse effects to UT Austin either as a whole or to a college/school/unit level.

In accordance with directives from The University of Texas System Board of Regents, the Office of Internal Audits will perform follow-up procedures to confirm that audit recommendations have been implemented.

Report Distribution

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