



RISK ADVISORY • TAX • FINANCE & ACCOUNTING

LARGE GOVERNMENT CONTRACTOR IT SECURITY ASSESSMENT

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- Client:** A large Medicare contractor with offices across the United States
- Need:** The company is required to conduct an annual security self-assessment, based on approximately 450 core security requirements (CSRs) by the Centers for Medicare and Medicaid Services (CMS).
- Reason:** The client needed to provide complete documentation of its controls to satisfy the security requirements and identify a plan of action for compliance in those situations where a requirement was not met. The objectives of the engagement were to analyze and compile information document security controls in the online reporting tool and work with management to create action plans for remediation of noncompliant requirements. Known audit and risk assessment findings/weaknesses needed to be identified and incorporated in the tool.
- Capabilities:** The engagement required expertise in systems security, application development and business continuity planning. The client needed professionals with an audit mentality and excellent interviewing documentation and communication skills.
- We Provided:** Jefferson Wells updated existing control descriptions based on knowledge of the client's controls environment that had been obtained earlier engagements. Updated control descriptions (documentation for completion of CSRs) were sent to key points of contact within the IT, Human Resources, Building Security, Compliance, Internal Audit and Business Continuity Departments based on CSR requirements. Control description updates were solicited from the appropriate client contacts and inconsistencies were researched. Interviews and facilitated sessions were held to obtain current, accurate information for inclusion in the CMS CAST tool. For noncompliant CSRs, the Jefferson Wells team worked with appropriate management to identify plans of action that would result in compliance.
- Results:** The self-assessment initiative lasted nearly three months. Under a tight timeline, we completed the project in time to meet the CMS submission deadline. As a direct result of the quality of work performed by Jefferson Wells, the client requested the team remain for an additional month to analyze and update control descriptions based on changes made by the CMS after the submission due date, including approximately 60 new security requirements as well as significant changes to other requirements.