

Cybersecurity Awareness Training Requirement for Contractors

Frequently Asked Questions

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What's required and why?

To protect HHS resources, contractors of an HHS-contracted entity (whether public, private, or governmental) who have access to an HHS computer system or database must complete [cybersecurity awareness training](#) certified by the Texas Department of Information Resources (DIR).

The training is required by [Texas Government Code, Section 2054.5192](#).

The requirement extends to entities contracted with HHS through memoranda of agreement, memoranda of understanding, interagency contracts, and interlocal agreements.

Who is required to complete the training?

Any officer, employee, or subcontractor of an HHS-contracted entity with any level of direct access to any confidential HHS computer system or database (e.g., IAMOnline, HHS Microsoft Suite, including a secure file transfer protocol server), must complete a DIR-approved cybersecurity awareness training.

A subcontractor is any entity with whom an HHS-contracted entity enters into an agreement to perform all or part of the work the HHS-contracted entity is expected to complete. In addition, all contractors are required to complete cybersecurity training that have an HHS information system account or when they use a computer to perform at least 25 percent of their duties required under contract.

How often must contractors train?

An HHS-contracted entity's officers, employees, and subcontractors must complete DIR-approved training:

- Before the entity's contract with HHS is executed.
- Annually thereafter.

If an officer, employee, or subcontractor of an HHS-contracted entity is hired after the entity's contract with HHS is executed, DIR-approved training must be completed before access to an HHS computer system or database is provided.

How is compliance reported?

Reporting to HHS

An HHS-contracted entity that **isn't** defined as a state agency or local government by [Texas Government Code, Section 2054.5192](#), must report their compliance by filling out [Form 3834 Written Acknowledgement of Completion of Cybersecurity Training Program](#) and submitting it to their HHSC or DSHS contract manager.

Form 3834 is completed and submitted:

- Before execution of an HHS contract.
- Before renewal or extension of an HHS contract.

Reporting to DIR

If a contracted entity is defined by [Texas Government Code, Section 2054.5192](#), as a state agency or local government, the entity must report its contractors' compliance to DIR directly using DIR's [Cybersecurity Training Certification](#) page.

State agencies and local governments **don't** submit Form 3834 to their HHSC or DSHS contract manager.