CUNY The City
University
of
New York

Vice Chancellor for Technology and CIO
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January 23, 2017

The Honorable Thomas P. DiNapoli
Comptroller of the State of New York
Office of the State Comptroller
110 State Street
Albany, New York 12236

Dear Comptroller DiNapoli:

In accordance with section 170 of the Executive Law, the City University of New York, hereby submits its 90-day report on the implementation of a corrective action plan made based on the recommendations in the Comptroller's audit report 2015-S-34, *Controls over CUNY Fully Integrated Resources and Service Tool (CUNYfirst)*. While the implementation phase of the system is ongoing, we acknowledge and appreciate the control enhancements recommended in the audit, and CUNY has taken several actions since the publication of the audit as outlined below:

Recommendation

1) Require CUNY Central and the campuses to prepare and maintain documentation of all roles that are assigned or removed in CUNYfirst.

> <u>University Response</u>
>
> CUNY agreed with this recommendation and is taking the following actions:
> i) a feasibility study on a CUNY-wide online access form to expand what has been done on some campuses.
> ii) a utility that will provide a wizard-like tool to assist in defining and identifying appropriate user roles.
> iii) revision of ERP training to promote timeliness of role assignments, modifications, and removals.

Recommendation

2) Require CUNY Central, in addition to the attestations, to actively monitor all user access within CUNYfirst.

> <u>University Response</u>
>
> CUNY agreed with this recommendation with one qualification: the primary responsibility for continuous monitoring of user access will remain with the college functional unit heads,

as they are better situated to making the determination that an employee's duties may no longer fully align with his or her access privileges. In order to better manage the control risk, CUNY will provide additional training for all CUNY Application Security Liaisons (ASLs) and functional unit heads. In addition, CUNY is drafting a high-level policy and procedure, in conjunction with the existing University Information Technology Security Procedures, that will dictate when and how access should be reviewed.

Recommendation

3) Periodically review and adjust the user access roles in the system to meet the actual needs of the individuals identified in our audit and system wide.

University Response

CUNY agreed with this recommendation. This recommendation is a direct result of the deficiencies noted in Recommendations 1 and 2; therefore, the controls being designed and implemented to address those recommendations will ensure that access levels are reviewed on a consistent basis. Continuing education of users on a periodic basis will also help functional unit heads and business process owners create stronger security controls. This process has been initiated at CUNY Central.

Recommendation

4) Ensure that ASLs grant access only upon receipt of a fully approved form.

University Response

CUNY agreed with this recommendation, and the requirement that all forms must be completed, with all required signatures is being reinforced with the ASLs through continuing education.

Recommendation

5) Implement a practice that requires student employees to document all grade changes processed and document the review of these changes.

University Response

CUNY agreed with this recommendation. There are unique risks associated with providing CUNY student employees certain access to sensitive system information based upon their job description and responsibilities. We will work with the colleges and appropriate Central offices to develop procedures that ensures all grading transactions processed by student employees are documented and reviewed on a regular basis.

Recommendation

6) Create a control within the CUNYfirst system that prohibits ASLs and other users from changing their own access roles.

University Response

CUNY agreed with this recommendation and has taken the following actions:

i) Implemented a system modification that prevents ASLs from assigning themselves roles in the Campus Solutions module in the production system. CUNY is currently testing this same modification in other PeopleSoft pillars that comprise CUNYfirst.

ii) Notified the ASLs that they will need to follow the standard approval process to access the production system for any reason. Once approved by a business process owner, such access will be assigned in the production system by another ASL.

iii) Updated the ASL Handbook and other materials to document the above requirements.

iv) Creating reports and queries for CIS and campus IT staff to run on a periodic basis to ensure that the added controls are working.

Recommendations

7) Create a policy requiring a formal end and/or review date for all role delegations in CUNYfirst

The response to Recommendation 7 is incorporated into the response to Recommendation 8.

8) Require long-term access roles to be granted through the standard review and approval process

University Response

CUNY is modifying its business process so that delegated access is appropriately removed if the delegation does not have a predetermined end date. CUNY is also exploring options for system modifications that will allow predetermined end dates to be entered into the system for delegations and/or set maximum durations for them to remain active.
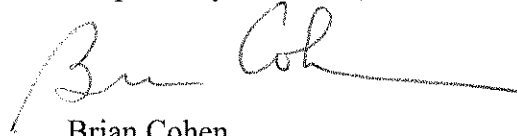
Recommendation

9) Periodically survey users from all CUNYfirst user groups to measure whether their needs are being met

University Response

CUNY agreed with the recommendation, and CUNY continues to consult with various user groups on the development of effective means of soliciting user feedback including email surveys, various CUNY committees and councils comprised of college staff, and other methodologies designed to elicit useful feedback. The feedback received from these stakeholders results in programmatic changes, new queries, reports and functional workflow redesigns.

We appreciate the opportunity to submit this report. CUNY remains committed to IT Security and appropriate controls.

Respectfully submitted,

Brian Cohen
Vice Chancellor of Technology and CIO

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      Hon. John J. Flanagan, Temporary President and Majority Leader of the Senate
      Hon. Hugh T. Farley, Vice President Pro Tempore, Senate
      Hon. Andrea Stewart-Cousins, Minority Leader, NYS Senate
      Hon. Carl E. Heastie, Speaker, NYS Assembly
      Hon. Joseph D. Morelie Majority Leader, NYS Assembly
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      Hon. Herman D. Farrell Jr., Chair, NYS Assembly Ways and Means Committee
      Ms. Carmen Maldonado, Audit Director, Office of the State Comptroller
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