



UNDERSTAND PREVENT

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BY EMAIL & FIRST CLASS MAIL

November 4, 2016

John F. Buyce, CPPA, CIA, CFE, CGFM
Audit Director
State of New York
Office of the State Comptroller
110 State Street
Albany, NY 12236

Re: Security Over Electronic Protected Health Information
Report 2016-F-19

Dear Mr. Buyce:

Thank you for your October 7, 2016 letter (the "Letter") and the opportunity to respond. This response addresses the two partially implemented recommendations in your Letter.

RECOMMENDATION 1

As your Letter kindly recognizes, Roswell Park Cancer Institute ("RPCI") closed 92 % (49 of 53) of its risk items that have been open for over a year. See Letter at Recommendation 1 and RPCI's Chief Information Security Officer Kimberly Ritze's September 8, 2016 email to State Program Examiner Robert Horn (attached). Of the four remaining open items, three are scheduled to be closed by the end of 2017. See RPCI's Open 2015 Risk Register (attached) at Items 5, 6, and 7. RPCI plans to remediate the last remaining open item, with phase 1 of the remediation targeted to be complete by March 31, 2017. See Risk Register, Item 9.

RECOMMENDATION 2


RPCI's HIPAA Security Officer and Assistant Vice President of IT Security, Mike Mineo, created an initial Incident Response Threat Modeling Procedure. RPCI has used this procedure to review the IR Database to reprioritize any remaining items and work to closure. See Ms. Ritze's September 8, 2016 email to Mr. Horn and attached Threat Modeler.

I believe this addresses your Letter's concerns. As always, if you have any questions or concerns, please feel free to call or email me at 716-845-3248 or Laura.Linneball@RoswellPark.org.

John F. Bryce, CPPA, CIA, CFE, CGFM
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Please extend our regards to your auditors, especially Messrs. Ren, Hoffman, Horn and Ms. Hurd. We enjoyed working with them and appreciate your office's courtesy and cooperation.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Laura A. Linneball". The signature is fluid and cursive, with a large initial "L" and "A".

Laura A. Linneball
Associate General Counsel

Enclosures

cc w/o enclosures: Michael L. Joseph, Chairman of the Board
cc w/ enclosures: Michael B. Sexton, Chief Institute Operations Officer, General
Counsel
Kimberly Ritze, Chief Information Security Officer
Michael Mineo, HIPAA Security Officer, AVP IT Security