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September 25, 2018

Ms. Vita C. Rabinowitz
Interim Chancellor
City University of New York
205 East 42nd Street
New York, NY 10004

Re: Controls Over CUNY Fully Integrated
Resources and Services Tool
Report 2018-F-4

Dear Ms. Rabinowitz:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by the officials of the City University of New York (CUNY) to implement the recommendations contained in our audit report, *Controls Over CUNY Fully Integrated Resources and Services Tool* (Report 2015-S-34).

Background, Scope, and Objective

CUNY is the largest urban university in the United States, consisting of 24 institutions. The CUNY Fully Integrated Resources and Services Tool (CUNYfirst), which replaced CUNY's legacy systems, is an Enterprise Resource Program used for various applications including student administration, financial administration, and human resources. As of February 15, 2018, there were 1.64 million CUNYfirst users consisting of both active and inactive employees and current and former students.

Our prior audit found that CUNY's processes and controls did not adequately ensure that CUNYfirst users had access only to functions that were necessary to meet their needs. We issued our initial audit report on September 2, 2016. The objective of our follow-up review was to assess the extent of implementation, as of September 13, 2018, of the nine recommendations included in our initial report.

Summary Conclusions and Status of Audit Recommendations

We found that officials have made progress in addressing the issues identified in our initial report. Of the nine prior audit recommendations, one was implemented, six were partially implemented, and two were not implemented.

Follow-Up Observations

Recommendation 1

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

Status - Partially Implemented

Agency Action - CUNY issued a new Application Security Liaison (ASL) Manual in January 2017 containing guidelines and procedures for assigning and maintaining users. CUNY is also in the process of implementing an online user access request form for CUNYfirst users. Additionally, although CUNY has created an application, Role Assignment Information Description and Support (RoleAIDS), to control CUNYfirst role assignment and maintenance, it has not been rolled out to the schools.

We visited six colleges to review documentation of approval forms for roles of CUNYfirst users. We sampled users at each college to include employees who were active, inactive, and retired, as well as users who were students. At two of the colleges, we found users who did not have the required approval forms.

- At one college, of the 14 users we sampled, 12 had standard roles granted; 1 retiree, who should have been deleted, had access to run queries; and 1 had no access.
- At another college, we examined the documentation of specific roles for four CUNYfirst users who had a total of 216 access roles granted. We found that 65 roles were granted on user access forms and another 44 roles were automatically provisioned, leaving 107 roles that were not explained by either user access forms or automatic provisioning.

Recommendation 2

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

Status - Partially Implemented

Agency Action - CUNY is in the process of implementing an electronic security access request form. CUNY officials provided a draft flow chart of the new process, dated May 2017. CUNY is also in the process of implementing an online user access request form for CUNYfirst users. Additionally, the CUNY application, RoleAIDS, which will control CUNYfirst role assignment and maintenance, has not yet been rolled out to the schools.

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.

Status - Partially Implemented

Agency Action - As part of RoleAIDS, CUNY management developed a matrix to monitor access, role access, conflicts, and approvals. Regarding the 47 users that we found in the initial audit who had incompatible roles, CUNY officials indicated that the access roles were necessary for these employees. However, they did not provide documentation to support their statement.

Recommendation 4

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

Status - Partially Implemented

Agency Action - Our review of CUNYfirst user access forms found that 6 of 63 user forms sampled were not appropriately approved. The ASL Manual states that an ASL should only process fully completed forms with all required approvals. This information is also on the website at CUNY schools.

Recommendation 5

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

Status - Not Implemented

Agency Action - At one college, we noted that a student who was also employed in the Registrar's Office had access to grade change roles.

Recommendation 6

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

Status - Implemented

Agency Action - CUNY modified CUNYfirst to prevent ASLs from viewing or modifying their own account access roles.

Recommendation 7

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

Status - Partially Implemented

Agency Action - CUNY provided a draft of its Manager Delegation Workforce Administration policy in May 2018. This draft policy no longer allows open-ended delegations. However, it was not implemented as of September 12, 2018.

Recommendation 8

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

Status - Partially Implemented

Agency Action – CUNY’s draft policy on Manager Delegation Workforce Administration provides a process for setting predetermined delegation end dates. However, this policy was not implemented as of September 12, 2018.

Recommendation 9

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

Status - Not Implemented

Agency Action - CUNY management stated funds were not available to survey CUNYfirst users to measure whether their needs were being met.

Our initial audit also identified two issues pertaining to the data integrity of particular CUNY functions. We had presented these findings in detail to CUNY officials during the course of the audit fieldwork for the initial report, however, we did not detail the findings and recommendations in the report to preserve security of these functions. During our follow-up review, CUNY provided evidence that one of the two issues was addressed.

Contributors to this report were Abe Fish, Christine Chu, Anthony Belgrave, and Joan Williams.

We would appreciate your response to this report within 30 days, indicating any actions planned to address any unresolved issues discussed in this report. We thank the management and staff of CUNY for the courtesies and cooperation extended to our auditors during this review.

Very truly yours,

Carmen Maldonado
Audit Director

cc: G. Taylor, CUNY, Director, Internal Audit
Division of the Budget