



**Office of Children
and Family Services**

ANDREW M. CUOMO
Governor

SHEILA J. POOLE
Acting Commissioner

RECEIVED
EXECUTIVE CORRESPONDENCE

JUN 19 2019

OFFICE OF THE STATE COMPTROLLER
THOMAS P. DiNAPOLI
COMPTROLLER

June 17, 2019

Honorable Thomas P. DiNapoli
New York State Comptroller
110 State Street, 15th Floor
Albany, NY 12236

Dear Comptroller DiNapoli:

In accordance with the provisions of section 170 of the Executive Law, the Office of Children and Family Services (OCFS) has taken or will be taking the following actions to implement the recommendations contained in the Office of the State Comptroller's (OSC) Final Audit report #2017-S-56, issued in March of 2019.

Recommendation 1: Develop a program to ensure controls over user access to OCFS systems meet the applicable NYS IT requirements, including:

- o Maintaining and regularly reviewing user lists for each application,
- o Developing and maintaining an up-to-date list of administrators for each application,
- o Developing and maintaining an up-to-date inventory of systems, and
- o Formally classifying all information assets.

Recommendation 2: Improve the timeliness of cooperation with authorized State oversight inquiries to ensure transparent and accountable agency operations.

Actions Taken to Date: Recommendation 1

Maintaining and regularly reviewing user lists for each application

OCFS has implemented a schedule to review user accounts of critical systems on an annual basis. To date, OCFS has completed the review of accounts for the systems that were the subject of this audit and is in the process of reviewing the user accounts for all OCFS systems. OCFS has requested the disabling of entitlements for users who have been inactive for more than one year.

Developing and maintaining an up-to-date list of administrators for each application

As a general matter, account administration takes place both by OCFS and New York State Office of Information Technology Services (ITS). OCFS's processes for account management, including administrator accounts, are consistent with ITS

Policy NYS-P03-002 Information Security, which requires that all OCFS applications have an individual person or unit responsible for the management and access control of each application. To better manage this process, OCFS has developed an Account & Access Management Policy that will be disseminated to all staff. OCFS has completed a review of administrators for the systems within the scope of this audit and is in the process of reviewing the administrators for the remaining OCFS systems.

Developing and maintaining an up-to-date inventory of systems

During the initial stages of the audit, there was considerable ambiguity regarding OSC's request for a list of all "systems that process and/or store sensitive data" and how OSC defined "systems." As a result, in January of 2018, OCFS and OSC met to discuss the scope of the audit and to discuss specific criteria to define the list of systems responsive to OSC's request. Based on those discussions, both parties agreed that OCFS would provide a list of systems supported by ITS. OCFS provided that list of systems and explicitly advised that the list was not a comprehensive inventory of the agency's systems. Although OCFS disagrees with this finding, OCFS has reviewed and updated its system inventory and will continue to do so.

Formally classifying all information assets

OCFS has completed the formal classification and documentation of classification for all OCFS applications.

Actions Taken to Date: Recommendation 2

Improve the timeliness of cooperation with authorized State oversight inquiries to ensure transparent and accountable agency operations.

As OCFS indicated in the response to the draft report, OCFS responded to OSC's requests throughout the audit. However, as the computer systems reviewed by OSC are supported by ITS, additional time was required due to the complexity of the technical systems, lack of common terminology, and multi-party relationship.

Sincerely,



Brendan G. Schaefer, CPA
Director, Office of Audit and Quality Control

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