



Senior Vice Chancellor and Chief Financial Officer

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June 10, 2020

The Honorable Thomas P. DiNapoli
Comptroller of the State of New York
Office of the State Comptroller
110 State Street
Albany, NY 12236-0001

Dear Mr. DiNapoli,

In accordance with Section 170 of the Executive Law, The City University of New York (CUNY) hereby submits its 180-day report on the implementation of the corrective action recommendations made in the New York State Comptroller's audit report (2018-S-61), *Compliance with Payment Card Industry Standards*, as follows:

To the University Central Office:

1. *Develop strategies to enhance compliance with PCI DSS and improve monitoring of PCI compliance at all CUNY colleges.*

Response: The University Central Office has issued CUNY PCI-DSS Guidelines to all its campuses, which include a program checklist for each college to follow. Each college has appointed a PCI liaison to facilitate the compliance efforts at the local level. Since the completion of the OSC audit, the University's Central Office has provided additional presentations, training, and guidance to enhance colleges' awareness and enhance compliance with PCI-DSS.

The Central Office is using the program checklist to monitor the colleges' PCI compliance. A portal page has also been established to help implement and manage PCI-DSS requirements University-wide, such as external vulnerability scanning and the Self-Assessment Questionnaire (SAQ) process.

2. *Update CUNY-developed Guidelines to reflect issues pointed out in the report.*

Response: The current version of the CUNY PCI-DSS Guidelines reflects the PCI-DSS requirements issued by the PCI Security Standards Council. As PCI-DSS requirements continue to evolve, CUNY will continue to enhance its guidelines and update the colleges and their related entities.

To the CUNY Colleges Visited:

3. *Implement the recommendations detailed during the audit for strengthening technical controls over cardholder data.*

Response: We are pleased to report that the colleges visited during the audit have made progress in implementing the recommendations addressed to them by OSC. The Central Office is assisting colleges, as needed, in their efforts to comply with PCI-DSS requirements.

Thank you again for the opportunity to report on implementation of the audit recommendations. We very much appreciate the continued support and guidance from the New York State Comptroller's Office. Please contact me if you need any additional information.

Respectfully,

Matthew Sapienza

Matthew Sapienza
Senior Vice Chancellor and Chief Financial Officer
The City University of New York

- c. Hon. Andrew M. Cuomo, New York State Governor
Hon. Andrea Stewart-Cousins, Majority Leader of the Senate
Hon. John J. Flanagan, Minority Leader of the Senate
Hon. Carl E. Heastie, Speaker of NYS Assembly
Hon. Crystal D. Peoples-Stokes, Majority Leader of the NYS Assembly
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Gordon Taylor, Executive Director of Internal Audit and Management Services, The City University of New York
Mr. Brian Reilly, Audit Director, Office of the State Comptroller