

February 17, 2021

Honorable Thomas DiNapoli
New York State Comptroller
110 State Street
Albany, New York 12207

Re: Audit Report 2019-S-34 User Access Controls Over Selected System Applications

Dear Mr. DiNapoli:

We appreciate the review of user access controls over selected system applications at the State University of New York Upstate Medical University (Upstate) by the Office of State Controller (OSC). As required under Section 170 of the Executive Law, this letter serves as the Upstate report to the Governor, the State Comptroller and the leaders of the Legislature and fiscal committees, advising them of the steps that have been taken to implement the recommendations included in Report 2019-S-34.

OSC Recommendation:

Improve controls over user access to Upstate applications to ensure they meet the applicable laws, regulations and policy requirements.

Upstate Response:

Upstate considers user access over system applications to be one of its most critical operational functions to ensure that patient, student and staff information in our dynamic and complex institution is protected. We have an extensive system of internal controls relating to user access and have further enhanced our controls as a result of the OSC audit. The following summary describes those enhancements.

- We have modified our IMT Security system to ensure that all applications in our Application Inventory systems are merged into our IMT Security System and that user lists are uploaded and stored within both systems. This enables system administrators to more completely review their assigned system's user access status. The application also now has a function to easily compare an individual's system access against their HR status.

- We have further enhanced our controls such that our Identity Management staff in addition to our System Administrators review and act upon removing access for terminated staff and assessing access needs for staff transfers on a daily basis.
- In the event an exception is requested regarding application access for someone who would otherwise have access removed, a centralized documentation and approval procedure has been implemented.
- We have aligned our formal policies that address access to ensure consistency throughout the institution.
- We have implemented a more robust audit function in our Office of Information Security to ensure our system administrators are adhering to policy requirements concerning access.
- In order to further protect sensitive and confidential information, if a user of a clinical application has not logged into that application for a period of 180 days, access is automatically revoked.

OSC Recommendation:

Remove access for improper user account identified in our audit.

Upstate Response:

Upstate's IMT department has removed any improper user access identified in the OSC audit. Upstate would like to highlight that no compromises of information were found during the OSC audit.

Upstate appreciates the efforts of OSC during this audit period which highlighted areas for improvement while also validating existing practices required to manage user access for our workforce. If you have any questions regarding the response, please contact Michael Jurbala, AVP Internal Audit and Advisory Services at (315) 464-4692.

Best regards,

Mantosh Dewan, MD
President
SUNY Distinguished Service Professor

cc: Brian Reilly, OSC
Mark Zeman
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Amy Montalbano