



# Office of Children and Family Services

ANDREW M. CUOMO  
Governor

SHEILA J. POOLE  
Commissioner

January 28, 2021

Brian Reilly, CFE  
Audit Director  
Office of the State Comptroller  
110 State Street  
Albany, New York 12236

## ***Re: Access Controls Over Selected Critical Systems (Report 2020-F-11)***

Dear Mr. Reilly:

The New York State Office of Children and Family Services (OCFS) has prepared the following further response to the Office of the State Comptroller's (OSC) final report of the audit entitled "Access Controls Over Selected Critical Systems" (Report 2020-F-11).

### **Response to Recommendation #1:**

The Office of Children and Family Services is pleased that OSC has recognized the agency's efforts to improve its security posture by addressing all four elements of this recommendation and has concluded that the recommendation has been fully implemented. These include:

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

### **Response to Recommendation #2:**

OCFS disagrees with OSC's conclusion that our agency has not implemented the 2<sup>nd</sup> recommendation cited in this report. OCFS has implemented significant access control changes based on the recommendations of OSC, and was eager to demonstrate our efforts, improvements, and compliance with the recommendations. Due to the sensitive nature of the information and the public health crisis, our agency was able to reach an agreement with your audit staff on how information could be provided to them in a secure manner while at the same time addressing internal controls necessary to protect our information assets. More specifically, OSC's audit staff agreed to OCFS's Information Security Officer providing your staff with a walk-through of the agency's asset inventory during an on-site visit on November 3<sup>rd</sup>, 2020. Furthermore, OSC then found the recommendations fully implemented. These improvements were made despite the challenges that our agency was facing during the audit period. OSC agreed to the method of the audit, had sufficient access to sensitive information to determine that the recommendations have been implemented and acknowledged improvement in cooperation.

Thank you for providing OCFS the opportunity to respond and provide additional clarity on this report. Should you have any questions or concerns, please feel free to contact Bonnie Hahn via email at [Bonnie.Hahn@ocfs.ny.gov](mailto:Bonnie.Hahn@ocfs.ny.gov) or by phone at (518) 402-3985.

Sincerely,



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

CC: Sheila Poole, Commissioner of the Office of Children and Family Services  
Suzanne Miles-Gustave, Deputy Commissioner for Legal Affairs & General Counsel  
Erin Cassidy, Associate Commissioner, Office of Children and Family Services