

THOMAS P. DiNAPOLI
STATE COMPTROLLER



110 STATE STREET
ALBANY, NEW YORK 12236

STATE OF NEW YORK
OFFICE OF THE STATE COMPTROLLER

January 28, 2026

Sally Drake
Executive Director
Natural Heritage Trust
625 Broadway, 3rd Floor
Albany, NY 12207

Re: Security Over Critical Systems
Report 2025-S-25

Dear Ms. Drake:

Pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution; Article V, Section 1 of the State Constitution; and Article II, Section 8 of the State Finance Law, we have conducted an audit of the Natural Heritage Trust to determine whether its access controls and vulnerability management over critical systems are sufficient to minimize the various risks associated with unauthorized access to systems and data.

Background

The Natural Heritage Trust (NHT) is a non-profit public benefit corporation of New York State, established in 1968. NHT's mission is to receive and administer gifts, grants, devises, and bequests of real and personal property to further conservation, outdoor recreation, historic preservation, and waterfront and community revitalization. NHT accomplishes its mission by facilitating private investment and ensures safekeeping, prudent investment, and appropriate expenditure of funds on cooperative programs and projects with its agency partners: the Office of Parks, Recreation and Historic Preservation; Department of Environmental Conservation; and Department of State. NHT also partners with other public and private entities, not-for-profits, and groups that share mission-compatible goals and purposes. NHT is governed by a four-member Board of Directors dedicated to supporting projects and programs that improve State park facilities, enhance access to outdoor recreation and environmental education, preserve historic and cultural assets, and protect natural resources.

As of March 2025, NHT had 52 employees on its payroll, including seven administrative staff responsible for core operations, which encompass fundraising and donor relations, banking, accounting, investment management, compliance, payroll, and benefits; and 45 program staff from partner agencies.

NHT issued its own stand-alone, vendor-hosted website in June 2021 to enhance the user and administrator experience and utilizes a fundraising database to track donor and donation information. Additionally, NHT uses customized donation forms on its website.

Results of Audit

We identified areas including governance over Payment Card Industry Data Security Standard requirements, and security controls where NHT could improve certain security controls to minimize the risks associated with unauthorized access to its systems and data. Due to the confidential nature of our audit findings, we communicated the details of these findings with four recommendations in a separate, confidential report to NHT officials for their review and comment. NHT officials generally agreed with our findings and indicated actions to implement our recommendations.

Recommendation

1. Implement the four recommendations included in our confidential draft report.

Audit Objective, Scope, and Methodology

The objective of our audit was to determine whether NHT's access controls and vulnerability management over critical systems are sufficient to minimize the various risks associated with unauthorized access to systems and data. The audit covered the period from January 2025 through September 2025.

To accomplish our objective and assess related internal controls, we interviewed NHT employees and officials, reviewed relevant NYS ITS policies, reviewed vulnerability and other assessments conducted by NHT, and verified user access controls. We also verified that credit card donations received via mail were handled properly. Additionally, we examined the security features of the applications and reviewed information to identify any vulnerabilities related to security, payment processing integrity, confidentiality, and privacy.

We obtained data from NHT's applications and assessed the reliability of that data by interviewing officials knowledgeable about the system, performing electronic testing, and tracing to and from source documents. We determined that the data from these systems was sufficiently reliable for the purposes of this report.

Statutory Requirements

Authority

The audit was performed pursuant to the State Comptroller's authority as set forth in Article X, Section 5 of the State Constitution; Article V, Section 1 of the State Constitution; and Article II, Section 8 of the State Finance Law.

We conducted our performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective.

In addition to being the State Auditor, the Comptroller performs certain other constitutionally and statutorily mandated duties as the chief fiscal officer of New York State. These include operating the State's accounting system; preparing the State's financial statements; and approving State contracts, refunds, and other payments. These duties could be considered management functions for purposes of evaluating organizational independence

under generally accepted government auditing standards. In our professional judgment, these duties do not affect our ability to conduct this independent performance audit of NHT's oversight and administration of security over critical systems.

Reporting Requirements

We provided a draft copy of this report to NHT officials for their review and formal comment. We considered their comments in preparing this final report and have included their response in its entirety at the end of it. In their response, NHT officials agreed with our audit conclusions and recommendation.

Within 180 days after final release of this report, as required by Section 170 of the Executive Law, the Executive Director of the Natural Heritage Trust shall report to the Governor, the State Comptroller, and the leaders of the Legislature and fiscal committees, advising what steps were taken to implement the recommendation contained herein, and where the recommendation was not implemented, the reasons why.

Major contributors to this report were Justin Dasenbrock, Daniel Raczynski, Monal Patel, Madison Adams, Cullen Spang, and Rahim Uddin.

We wish to thank the management and staff of NHT for the courtesies and cooperation extended to our auditors during this audit.

Very truly yours,

Nadine Morrell, CIA, CISM
Audit Director

cc: Sarah Purcell, Natural Heritage Trust

Agency Comments

Natural Heritage Trust

January 12, 2026

Nadine Morrell, CIA, CISM, Audit Director
NYS Office of the State Comptroller
Re: OSC Audit 2025-S25
Via email

Dear Ms. Morell,

Thank you for the opportunity to review and comment on the draft audit report.

The NHT agrees with your audit findings and recommendations. The steps we have taken to implement your recommendations are detailed in our separately communicated response.

I am appreciative of the professionalism, technical expertise and communication from members of the audit team throughout the audit process.

Thank you and sincerely,

A handwritten signature in blue ink that reads "Sally Drake". The signature is written in a cursive, flowing style.

Sally Drake, Executive Director

Natural Heritage Trust

625 Broadway, Albany, New York 12207 • P. (518) 474-2997 • naturalheritagetrust.org