



Office of Information Technology Services

ANDREW M. CUOMO
Governor

MARGARET MILLER
Chief Information Officer

The Honorable Andrew M. Cuomo
Governor
State of New York
State Capitol
Albany, New York 12224

The Honorable Joseph D. Morelle
Majority Leader
New York State Assembly
Legislative Office Building, Room 926
Albany, New York 12248

The Honorable Kathleen C. Hochul
Lieutenant Governor
State of New York
State Capitol
Albany, New York 12224

The Honorable Brian M. Kolb
Minority Leader
New York State Assembly
Legislative Office Building, Room 933
Albany, New York 12248

The Honorable Thomas P. DiNapoli
Comptroller
State of New York
110 State Street
Albany, New York 12236

The Honorable John A. DeFrancisco
Chairman, Finance Committee
New York State Senate
State Capitol, Room 416
Albany, New York 12247

The Honorable John J. Flanagan
Temporary President and Majority Leader
New York State Senate
State Capitol, Room 330
Albany, New York 12247

The Honorable Liz Krueger
Ranking Member, Finance Committee
New York State Senate
Legislative Office Building, Room 808,
Albany, New York 12247

The Honorable Jeffrey D. Klein
Independent Democratic Conference Leader
New York State Senate
Legislative Office Building, Room 913
Albany, New York 12247

The Honorable Herman D. Farrell, Jr.
Chairman, Ways and Means Committee
New York State Assembly
Legislative Office Building, Room 923
Albany, New York 12248

The Honorable Andrea Stewart-Cousins
Democratic Conference Leader
New York State Senate
Legislative Office Building, Room 907
Albany, New York 12247

The Honorable Robert C. Oaks
Ranking Member, Ways and Means Committee
New York State Assembly
State Capitol, Room 444
Albany, New York 12248

The Honorable Carl E. Heastie
Speaker
New York State Assembly
Legislative Office Building, Room 932
Albany, New York 12248

Dear Governor Cuomo, Lt. Governor Hochul, Comptroller DiNapoli, Leader Flanagan, Leader Klein, Leader Stewart-Cousins, Speaker Heastie, Leader Morelle, Leader Kolb, Senator DeFrancisco, Senator Krueger, Assemblyman Farrell and Assemblyman Oaks:

Enclosed is the ITS status report on the implementation of recommendations contained in the Office of the State Comptroller's audit report entitled: "Security and Effectiveness of the Department of Motor Vehicle's Licensing and Registration Systems – Report 2013-S-58". ITS's responses do not contain specific details of its security efforts in order to better protect the integrity of the State's critical infrastructure and data.

Sincerely,

A handwritten signature in dark ink, appearing to read "Theresa A. Papa". The signature is fluid and cursive, with the first name "Theresa" being more prominent than the last name "Papa".

Theresa Papa
Director of Administration

Enclosure

OFFICE OF INFORMATION TECHNOLOGY SERVICES
Status of the Office of the State Comptroller's
Recommendations Contained in the Final Audit Report
on Security and Effectiveness of DMV Licensing and
Registration Systems Report 2013-S-58
90 Day Response

Recommendation	Status
1. Prioritize Cluster initiatives to include completion of appropriate tasks in order to reach compliance with PCI Data Security Standards.	PCI compliance is and always has been a priority for both DMV and ITS. DMV systems have been assessed as compliant with PCI Security Standards 2.0 by the PCI Security Standards Council.
2. Create Enterprise-wide and resultant aligning Cluster policies that address logging and user access control.	<p>The purposes of IT Transformation is to standardize policies and best practices across the enterprise and to decommission legacy agency practices that are inadequate or outdated. Accordingly, there is no need to align enterprise and cluster policies because the agencies within the clusters will be adopting the enterprise policies.</p> <p>Enterprise-wide policies such as a Patch Management Standard, Security Logging Standard, Authentication Tokens Standard, are being established by ITS on a regular basis. These policies are being institutionalized through data center and service management consolidation. Both consolidations are underway. As agencies consolidate within the centralized data center and adopt the service management methodologies, these enterprise policies become applicable to the agencies. Until the agencies become consolidated within the data center and until they adopt the service management methodologies, their legacy policies or, in the absence of any documented legacy policy, their practices, are generally continued.</p>
3. Create, maintain, and monitor a log of patches applied to Department software to ensure timely completion.	Logging patches does not ensure that patching is completed in a timely manner. To better ensure timely patching, ITS has instituted monthly vulnerability scans which give ITS visibility into whether patches to DMV software that should be applied have been. In addition, ITS is currently migrating agencies, including DMV, to enterprise-wide patch management solutions and processes.
4. Continue to move forward toward the implementation of a complete and viable change management and user access management process that will provide adequate controls.	There continues to be forward momentum toward the implementation of a complete and viable change management and user access management process that will provide adequate controls. For example, change management awareness and procedures have become more established in project workflows, and ITS and the state agencies are working together to review and establish new procedures for user access request. In alignment with NYS policies, migration to standard user access management processes and technologies is underway. The processes associated with authorizing ITS and DMV employee access to Department applications and systems resides within the Department and are being transitioned to the Department's risk office.

5. Develop and implement a succession plan, including Assembler and COBOL program language training, to ensure continuity of Department operations and service.

Continuous training and development for legacy systems is ongoing. New staff recruitment establishes COBOL and Assembler a baseline learning plan for staff assigned to legacy support units.

As ITS continues to develop and implement a succession plan in the ways described above, a true succession plan dealing with staff attrition from these legacy support units demands, at a minimum, mechanisms through which ITS can hire or otherwise obtain IT professionals who are skilled in these legacy programs. These mechanisms do not readily exist and severely impede a meaningful implementation of this recommendation. ITS cannot directly hire into its State workforce those people who are highly skilled in these legacy programs. Existing consultants can no longer converted to State workforce members. And the State does not have contracts through which these skills can be readily obtained. Without the mechanisms to readily hire or obtain these skill sets, a meaningful implementation of this recommendation will continue to be challenged. Additionally, true succession planning requires significant investments in, and commitment to, application modernization by and between the impacted business, technology and budget making entities.