


ERIE COUNTY WATER AUTHORITY
INTEROFFICE MEMORANDUM



July 25, 2018

To: Commissioners Schad and Carney

From: Robert J. Lichtenthal, Jr., Deputy Director 

Subject: Updated Corrective Action Plan for OSC Technology Audit 2016-2017

The Office of the New York State Comptroller (OSC) conducted an audit of the Authority to determine whether Authority officials adequately safeguarded and protected information technology (IT) assets, used in its business environment, against unauthorized use, access and loss. The audit period was from January 1, 2016 to October 6, 2017 with draft reports received in March, 2018 and a final report received in April, 2018. Attached is a copy of the final report issued after an exit conference with Authority staff and the Board Treasurer.

The Authority is required to file a plan of corrective action within 90 days from the issuance of the report. The report was issued May 4, 2018. Prior to this time I was tasked with developing a Plan of Corrective Action to address the key findings. Attached to this memo please find my updated draft recommended plan and the timeframes within it is to be accomplished as discussed at the Governance Committee meeting on July 19, 2018.

NYS OSC Finding #1

Authority officials did not develop procedures for managing system and network access.

NYS OCS Recommendation:

Authority Officials Should:

Develop and implement written procedures for managing System and network access that include periodically reviewing user access and disabling or deleting user accounts when access is no longer needed.

ECWA Plan of Corrective Action:

The Authority's Deputy Director has consulted with the Acting Manager of the Authority's Information Technology Department and will work with the Authority's IT Consultant to develop comprehensive written procedures for managing system and network access. The IT Consultant will prepare an initial draft of procedures and protocols and will forward its draft to the Deputy Director by October 31, 2018. The draft procedures will be reviewed by the Authority's IT Governance Committee. The IT Governance Committee will prepare its proposed procedures and protocols and will forward its proposal to the Deputy Director by November 30, 2018. After reviewing and conferring with other department heads, the Deputy Director will forward to the Authority's Board of Commissioners a final proposed procedures and protocol by December 5, 2018.

NYS OCS Finding #2

Internet usage was not routinely monitored

NYS OSC Recommendations:

The Board should:

Work with Authority officials to review and update the computer use policy and then ensure the IT Manager includes the updated policy when providing cybersecurity training to all employees.

ECWA Plan of Corrective Action:

The Board will review and approve all budget requests relating to staff training and other related items for the implementation of procedures, protocols and plans for monitoring access to the system and network by November 1, 2018. The Board's Governance Committee will review the proposed procedures and protocols recommended by the Authority's Deputy Director at its first committee meeting in

December. The Governance Committee will recommend to the Board for its approval a final procedures, protocols and monitoring plan by December 31, 2018 with implementation to take place in 2019.

NYS OSC Finding #3

The Authority does not provide adequate cybersecurity training to employees.

NYS OSC Recommendations:

Ensure that cybersecurity training is provided periodically to all employees to address current and emerging risks.

ECWA Plan of Corrective Action:

The Authority's IT Department and IT Consultant, in conjunction with the Human Resource Department will develop an initial and on-going program (including pro-forma training schedules) of Cyber Security Training for employees for review by Senior Managers by December 5, 2018. Internal and external resources will be identified for inclusion in the 2019 Authority O&M budget. Upon any needed budgetary approvals being received, implementation will commence upon Board approval of the 2019 budget with a target date of January 1, 2019 for implementation of procedures, protocols and monitoring and with completion of employee training by March 31, 2019.