



The State University
of New York

Office of the
Chief Financial Officer

State University Plaza
Albany, New York 12246

www.suny.edu

January 26, 2018

Ms. Nadine Morrell
Audit Manager
New York State Office of The State Comptroller
110 State Street
Albany, New York 12236

Re: Report 2017-F-24

As requested, we are providing our comments to the final report "Compliance with Payment Card Industry Standards" (2017-F-24). The report acknowledges that SUNY officials made considerable progress implementing the recommendations noted in the initial audit. Of the initial report's three recommendations, two are fully implemented and one is substantially implemented.

The status of the recommendations are as follows:

Recommendation 1

Implement the [18] recommendations contained in the detailed preliminary reports.

Status: Partially Implemented.

Of the 18 recommendations initially made to six campuses, OSC found 14 recommendations were fully implemented and 1 is no longer applicable. Since the time of the audit, one campus fully implemented their recommendation regarding data security. Two campuses are in the process of implementing its respective recommendation. Specifically, one campus is in the process of ensuring self-assessment questionnaires (including affiliates) are fully and accurately completed, and the other campus is developing a formal process to complete and report on a self-assessment questionnaire.

Recommendation 2

Develop strategies to enhance compliance with PCI DSS and improve monitoring of PCI compliance at all SUNY colleges.

Status: Implemented.

To Learn
To Search
To Serve



Recommendation 3

Revise contract templates for affiliates to address PCI DSS regulations and require affiliates' compliance.

Status: Implemented.

SUNY would like to note that PCI DSS compliance continues to be one of System's and the campuses priorities.

We would like to thank the staff of OSC for the work and cooperation in this review.

Sincerely,



Eileen McLoughlin
Senior Vice Chancellor for Finance and Chief Financial Officer

Copy: Chancellor Johnson

Mr. Porter

Mr. Abbott

Mr. McGrath

Mr. Gardner

Mr. Runyon