

23 NYCRR 500 Cybersecurity Status and Effectiveness Board Report 2025

for the

St. Lawrence-Lewis Counties School Districts Employees Medical Plan

St. Lawrence Lewis BOCES at one time processed insurance claims locally, with local data center resources and BOCES employees. Effective January 2020, SLLBOCES outsourced all new claims processing via Excellus/BlueCross-BlueShield. In 2021 any remaining open claims were closed-out and the system is accessible for archived historical claims research or legal queries.

Legally there is a 7-year minimum retention period on the in-house data, potentially longer depending on legal cases or claim review needs, this obligation continues until the calendar year 2027. This report addresses the DFS (Department of Financial Services) requirements.

The DFS altered the compliancy requirements for 2024, but due to our size and financial limits, The Plan's still qualifies for the same exemptions as prior years, the DFS changes did not affect the SLLBOCES responsibilities of the annual risk assessment and maintenance of a robust cybersecurity plan as well as disaster recovery and incident response plans.

- ✓ Annual risk assessed and determined to be a low risk.
 - Prior external testing did not notice that section of the network.
 - Data base continues to be "locked" to prevent any alterations during historical reference lookups.
 - The server is not accessible from the general network, only one employees account has regular access to the data sets and only two IT (Information Technology) staff have access to the base server as required for security patches and updating needs such as oracle and WLT licensing and support.
- ✓ Review and continual updating of key internal policies and procedures.
 - Cybersecurity Program
 - ** This winter SLLBOCES began participation in weekly CISA (Cybersecurity and Infrastructure Security Agency) vulnerability scanning.
 - Disaster Recovery and Incident Response Plans were reviewed and updated, as necessary.

The required components were reviewed with the Plan's Chairperson, Mr. Robert Finster, and the DFS compliance certificate was obtained early February 2025, Receipt Number: E-2025-1243097

The current cybersecurity program for The Plan is effective, and there are no cybersecurity events to report.