23 NYCRR 500 Cybersecurity Status and Effectiveness Board Report 2026

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 alters the compliancy requirements periodically, but due to our size and financial limits, The Plan currently 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.

  - As of July 31, 2025, the server was placed in a shutdown state. There have been no requests to reference the historical data since that date.
  - Anticipated date of destruction of the server hosting the claims data is early in the calendar year 2027.

- ✓ Review and continual updating of key internal policies and procedures.
  - Cybersecurity Program
    SLLBOCES continues participation in weekly CISA (Cybersecurity and Infrastructure Security Agency) vulnerability scanning.

  - Disaster Recovery and Incident Response Plans were reviewed and updated, as necessary.

  - The Plan is currently under an audit from DFS. The feedback is not yet available.
    The audit is primarily focused on the enrollment intake and changes in enrollment status processing as the participant claims are managed by a 3rd party, Excellus.

The required 23 NYCRR 500 components were reviewed with the Plan's Chairperson, Mr. Robert Finster, and the DFS compliance certificate was obtained early February 2026.

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