



**Hudson River -  
Black River  
Regulating District**

**KATHY HOCHUL**  
Governor

**MARK M. FINKLE**  
Chair

**JOHN C. CALLAGHAN**  
Executive Director

July 11, 2024

Thomas P. DiNapoli  
State Comptroller  
110 State Street  
Albany, NY 12236  
Attn: Nadine Morrell, CIA, CISM, Audit Director

**RECEIVED**  
EXECUTIVE CORRESPONDENCE

**JUL 22 2024**

OFFICE OF THE STATE COMPTROLLER  
**THOMAS P. DINAPOLI**  
COMPTROLLER

RE: Security Over Critical Systems Report 2023-S-24

Dear Comptroller DiNapoli:

Pursuant to Section 170 of the Executive Law, I write to update you on the status of implementing the recommendation contained in Audit Report 2023-S-24, Security Over Critical Systems.

At its March 12, 2024 meeting, the Regulating District's Board reviewed and unanimously approved a Resolution (24-14-03) that addresses the recommendation to develop relevant policies and procedures as required for Payment Card Industry (PCI) Data Security Standards (DSS).

This Resolution formally commits the Regulating District to continuously apply provisions relating to these standards in connection with its acceptance of credit card payments for those engaging in Access Permit System transactions. I am including a signed copy of this Resolution for your review.

Please do not hesitate to contact me for further discussion or with any questions.

Sincerely,

Mark Finkle  
Chair

CC: Governor Kathy Hochul  
Temporary President of the Senate Andrea Stewart-Cousins  
Speaker of the Assembly Carl Heastie  
Liz Krueger, Chair of the Senate Finance Committee  
Helene Weinstein, Chair of the Assembly Ways & Means Committee  
Thomas O'Mara, Ranking Member, Senate Finance Committee  
Edward Ra, Ranking Member, Assembly Ways & Means Committee

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24-14-03

**RESOLUTION APPROVING AMENDMENTS TO POLICY  
GOVERNING ACCEPTANCE OF ELECTRONIC PAYMENT  
BY APPLICANTS FOR ACCESS PERMIT SYSTEM TRANSACTIONS**

**WHEREAS**, the Hudson River- Black River Regulating District Board in Resolution 20-01-01 directed staff to implement a series of measures designed to improve customer service and efficiency by better utilizing available electronic payments technology; and

**WHEREAS**, the Regulating District also adopted policy governance for these improvements as part of Resolution 20-01-01; and

**WHEREAS**, the Regulating District designed and implemented these improvements in the years since January 2020 for those seeking to make electronic payments to obtain and renew their Access Permits on an in-person and online basis; and

**WHEREAS**, Access Permit seekers and holders have increased their use of electronic payments opportunities every year since the options were made available to them, including in the current year where 64% of renewals have been made and paid for electronically; and

**WHEREAS**, the Regulating District was recently the subject of a Security Over Critical Systems audit (2023-S-24) initiated by the Office of the State Comptroller in May 2023 and completed in January 2024 that concluded that the Regulating District demonstrated effort and timeliness in addressing security issues as they arise and further found that the Regulating District has generally taken appropriate steps to secure processes and systems used to accept credit card payments; and

**WHEREAS**, the Office of the State Comptroller also included a single recommendation related to electronic payments for the Regulating District; and

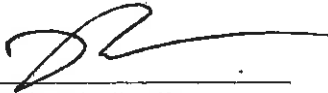
**NOW THEREFORE BE IT RESOLVED**, that the Hudson River- Black River Regulating District adopts the attached revised policy governing acceptance of electronic payment for its access permit system transactions, including provisions relating to Payment Card Industry Data Security Standards as recommended by the Office of the State Comptroller; and

**BE IT FURTHER RESOLVED**, that this Resolution shall take effect immediately after formal approval by the Hudson River-Black River Regulating District Board; and

**BE IT FURTHER RESOLVED**, that implementation of this revised policy governance shall be communicated to the Office of the State Comptroller in advance of the 180-day deadline stipulated in Section 170 of the New York State Executive Law.

*Approved at the March 12, 2024 Board Meeting*

Approved as to form:



Robert P. Leslie  
General Counsel

Motion was made by Mr. Reagan and seconded by Ms. Allen that the Resolution be approved.

Present and voting:

<u>MEMBER</u>	<u>AYE</u>	<u>NOE</u>	<u>ABSTAIN</u>
Mr. Finkle.....	<u>  X  </u>	<u>      </u>	<u>      </u>
Mr. Hayes.....	<u>  X  </u>	<u>      </u>	<u>      </u>
Mr. DeWitt.....	<u>      </u>	<u>      </u>	<u>      </u>
Mr. Bird.....	<u>      </u>	<u>      </u>	<u>      </u>
Mr. Candido.....	<u>  X  </u>	<u>      </u>	<u>      </u>
Mr. Reagan.....	<u>  X  </u>	<u>      </u>	<u>      </u>
Ms. Allen.....	<u>  X  </u>	<u>      </u>	<u>      </u>