



DANIEL P. MCCOY
COUNTY EXECUTIVE

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COUNTY OF ALBANY
DEPARTMENT OF MANAGEMENT AND BUDGET
DIVISION OF INFORMATION SERVICES
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ANDREW BELLINGER
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June 15, 2023

Hon. Andrew C. Joyce, Chairman
Albany County Legislature
112 State St., Rm. 710
Albany, NY 12207

Dear Chairman Joyce:

The Albany County Division of Information Service is requesting Legislative authorization and support for the adoption of the attached Information Security Incident Notification Policy. The Information Security Incident Notification Policy will help Albany County to establish a structured approach for communicating suspected and confirmed information security incidents effectively. This policy will also help Albany County departments comply with reporting requirements stipulated in the New York State SHIELD (Stop Hacks and Improve Electronic Data Security) Act which sets specific standards and reporting requirements for organizations that handle New York residents' private information. The Division respectfully requests consideration of this matter. If you have any questions or need additional information, please do not hesitate to contact me directly at 518-447-4962.

Sincerely,
Andrew Bellinger,
Chief Information Officer (Division of Information Services)

Cc: Dennis Feeney, Majority Leader
Frank Mauriello, Minority Leader
Rebekah Kennedy, Majority Counsel
Aris Zilgme, Minority Counsel



County of Albany

Harold L. Joyce
Albany County Office
Building
112 State Street - Albany,
NY 12207

Legislation Text

File #: TMP-4357, **Version:** 1

REQUEST FOR LEGISLATIVE ACTION

Description (e.g., Contract Authorization for Information Services):

Requesting to Create a Policy for Information Security Incident Notification

Date: 6/15/2023
Submitted By: Andrew Bellinger
Department: Division of Information Services
Title: Chief Information Officer
Phone: 5184474962
Department Rep.
Attending Meeting: Andrew Bellinger

Purpose of Request:

- ☐ Adopting of Local Law
- ☐ Amendment of Prior Legislation
- ☒ Approval/Adoption of Plan/Procedure
- ☐ Bond Approval
- ☐ Budget Amendment
- ☐ Contract Authorization
- ☐ Countywide Services
- ☐ Environmental Impact/SEQR
- ☐ Home Rule Request
- ☐ Property Conveyance
- ☐ Other: (state if not listed) [Click or tap here to enter text.](#)

CONCERNING BUDGET AMENDMENTS

Increase/decrease category (choose all that apply):

- ☐ Contractual
- ☐ Equipment
- ☐ Fringe
- ☐ Personnel

- ☐ Personnel Non-Individual
☐ Revenue

Increase Account/Line No.: Click or tap here to enter text.
Source of Funds: Click or tap here to enter text.
Title Change: Click or tap here to enter text.

CONCERNING CONTRACT AUTHORIZATIONS

Type of Contract:

- ☐ Change Order/Contract Amendment
☐ Purchase (Equipment/Supplies)
☐ Lease (Equipment/Supplies)
☐ Requirements
☐ Professional Services
☐ Education/Training
☐ Grant

Choose an item.

Submission Date Deadline Click or tap to enter a date.

- ☐ Settlement of a Claim
☐ Release of Liability
☐ Other: (state if not listed) Click or tap here to enter text.

Contract Terms/Conditions:

Party (Name/address):
Click or tap here to enter text.

Additional Parties (Names/addresses):
Click or tap here to enter text.

Amount/Raise Schedule/Fee: Click or tap here to enter text.
Scope of Services: Click or tap here to enter text.

Bond Res. No.: Click or tap here to enter text.
Date of Adoption: Click or tap here to enter text.

CONCERNING ALL REQUESTS

Mandated Program/Service: Yes ☒ No ☐
If Mandated Cite Authority: NYS SHIELD Act

Is there a Fiscal Impact: Yes ☐ No ☒
Anticipated in Current Budget: Yes ☐ No ☒

County Budget Accounts:

Revenue Account and Line: Click or tap here to enter text.

Revenue Amount: Click or tap here to enter text.

Appropriation Account and Line: Click or tap here to enter text.

Appropriation Amount: Click or tap here to enter text.

Source of Funding - (Percentages)

Federal: Click or tap here to enter text.

State: Click or tap here to enter text.

County: Click or tap here to enter text.

Local: Click or tap here to enter text.

Term

Term: (Start and end date) Click or tap here to enter text.

Length of Contract: Click or tap here to enter text.

Impact on Pending Litigation

Yes ☐ No ☒

If yes, explain: Click or tap here to enter text.

Previous requests for Identical or Similar Action:

Resolution/Law Number: Click or tap here to enter text.

Date of Adoption: Click or tap here to enter text.

Justification: (state briefly why legislative action is requested)

In March of 2020, New York State passed stricter cybersecurity laws under the Stop Hacks and Improve Electronic Data Security (SHIELD) Act. The SHIELD Act strengthens New York's data-security laws by: expanding the types of private information for which companies must provide consumer notice in the event of a breach, and requiring that companies develop, implement, and maintain reasonable safeguards to protect the security, confidentiality, and integrity of the private information. This request for legislative action is to approve and adopt an Information Security Notification Policy for Albany County employees. The policy outlines the steps Albany County employees should take in relation to a suspected or confirmed information security incident. This policy will also help Albany County be compliant with the NYS SHIELD Act in the event of an information security incident.



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Category: TBD	Policy Title: Information Security Incident Notification Policy
Responsible Office: Division of Information Services (DIS)	Document Number: TBD
	Effective Date: TBD
	This policy item applies to: Albany County departments and its employees

Summary

Albany County is committed to securing and protecting the information within its possession. Albany County departments shall adhere to all applicable federal, state, and local laws and regulations related to incident reporting, data breach notification, and information security.

Policy Purpose

The purpose of the Albany County Information Security Incident Notification Policy is to provide a clear and concise process for required notifications in the event of a suspected or confirmed Information Security Incident.

According to the National Institute of Standards and Technology (NIST), an Information Security Incident is defined as:

An occurrence or event that actually or potentially jeopardizes the confidentiality, integrity, or availability of an information system or the information the system processes, stores, or transmits or that constitutes a violation or imminent threat of violation of security policies, security procedures, or acceptable use policies.

Suspected or confirmed Information Security Incidents can be identified by anyone who has information related to the improper access or release of confidential and/or private information such as Protected Health Information (PHI) or Personal Identifiable Information (PII). This information can be identified through any avenue including personal knowledge of the incident or third-party notifications from outside entities.

Policy Details

Incident Reporting by County Departments:

All Albany County departments must follow established procedures for identifying and reporting security incidents promptly. In the event of an Information Security Incident within a department, employees are required to notify the Division of Information Services (DIS) immediately through the notifying procedures established below.

Reporting Security Incidents Involving Third-Party Vendors or Contractors:

Albany County departments must maintain a record of all third-party vendors and contractors with whom they have work relationships or agreements. If an Information Security Incident occurs involving a third-party vendor or contractor, the respective department must inform Division of Information Services as soon as they are made aware.

Security Incident Notification Procedures:

In the event that an employee or department within Albany County becomes aware of a suspected or confirmed Information Security Incident they must provide notification by one of the following ways:

- Contact the Albany County Helpdesk via telephone at 518-447-7200 option - 1
- Email the Albany County Cyber Incident Response Team at accirt@albanycountyny.gov

When contacting the Albany County Cyber Incident Response Team, please be prepared to provide the following information if it is available:

Information to include in the notification:

- Nature of the incident: Provide a clear description of the incident and its potential impact.
- Date and time: Specify when the incident occurred or was first noticed.
- Systems or data affected: Identify the specific systems, applications, or data that have been compromised or at risk.
- Initial findings or observations: Share any preliminary findings or observations related to the incident.
- Employees should include their contact information in the email for follow-up communication, if necessary.

Division of Information Services Procedures:

- Upon receiving a notification about an Information Security Incident, DIS will promptly evaluate the nature, severity, and potential impact of the incident. This evaluation will help determine the appropriate response actions, including incident containment, investigation, and notification requirements.
- The Division of Information Services, in conjunction with the Albany County Law Department, will be responsible for notifying the required New York State entities and Albany County users affected by the security incident.
- Notifications to external entities will be made in accordance with applicable laws, regulations, and contractual obligations.
- The Division of Information Services and the Albany County Law Department will collaborate to ensure that notifications are consistent, accurate, and appropriately authorized.

Policy Review and Maintenance:

This policy shall be reviewed regularly to ensure its effectiveness and alignment with changing technology landscapes, legal requirements, and industry standards. Updates or revisions to this policy should be communicated to all relevant departments and personnel.