

## Bryley Tips and Information February 2009

### **1. Review of Public Hearing on 201 CMR 17.00\* from 1/16/2009**

Roy Pacitto and Paul Torchia of Bryley Systems attended the 1/16/2009 Public Hearing. Many business leaders were also in attendance, most offering a similar theme: “This regulation hurts business and should be delayed or altered.” Highlights from the hearing:

- CMR 201 17.00 was insufficiently publicized.
- It will have significant, negative economic impact on complying organizations.
- It was unfavorably compared to a similar, but better planned and deployed, statute in NJ.

Likely outcome: Some components of 201 CMR 17.00 will be revised.

\*201 CMR 17.00 is a new Massachusetts Codes of Regulations (CMR) that requires businesses and organizations to protect personal information on Massachusetts residents. A reprint of our article, *201 CMR 17.00: Massachusetts new regulation to protect personal information*, is in Section 4 near the end of this e-newsletter.

### **2. Email encryption options to comply with 201 CMR 17.00**

Section 17.04.3 of 201 CMR 17.00 states “To the extent technically feasible, encryption of all transmitted records and files containing personal information that will travel across public networks...”, which includes email and FTP-type transfer of personal information.

Standard email is like sending a postcard through the mail, anyone can see it if they wish. Email encryption adds a heavy-duty envelope over the postcard, covering it from prying eyes.

Email encryption is a multi-transfer, encode/decode process:

- The sender encrypts an email and transmits it (over the Internet) to his/her email server,
- The sender’s email server forwards the encrypted email to the recipient’s email server,
- The recipient retrieves the encrypted email from his/her email server (over the Internet),
- The recipient decrypts the email through a decode key or an authentication process.

Most email-encryption schemes read each email for keywords (like “social-security number” or credit-card number”), encrypt emails with these keywords, then force a recipient to login to a secure site with username and password to retrieve the email. Others encrypt the email itself (or its attachments) and require the recipient to retrieve a decode key. Some options:

- Hosted email encryption services – Microsoft Exchange Hosted Encryption
- Appliance-based email encryption – IronPort (Cisco) Encryption Appliance
- Server-based encryption – PGP PDF Messenger, Tumbleweed, etc.
- Client-based email encryption – PGP® Desktop Email
- Simple encryption – PKWare SecureZip Standard

Please contact Bryley Systems for more information on Microsoft, Cisco, or PGP solutions.

### **3. Announcements, news, and events**

Prepare your business for privacy compliance – Please join Bryley Systems for a free, how-to seminar on complying with Massachusetts 201 CMR 17.00, Standards for the Protection of Personal Information of Residents of the Commonwealth.

These seminars will be held at 9:00am at Bryley's second-floor conference room in Hudson, MA. Refreshments will be served.

Seminar dates and times:

- February 18, 2009
- March 18, 2009
- April 22, 2009

To reserve a seat:

- Call 888.280.5799, extension 207 and ask for Isa.
- Visit [www.Bryley.com/Events.htm](http://www.Bryley.com/Events.htm).
- Email [Events@Bryley.com](mailto:Events@Bryley.com).

### **4. 201 CMR 17.00 – Massachusetts new regulation to protect personal information**

In September, 2008, Massachusetts introduced 201 CMR 17.00: Standards for the Protection of Personal Information of Residents of the Commonwealth. Originating from a directive to the Massachusetts Office of Consumer Affairs and Business Regulations (OCABR), 201 CMR 17.00 was initially slated to take effect January 1, 2009, but has been pushed back to May 1, 2009.

This CMR (Codes of Massachusetts Regulations) is extremely significant to any person or organization that collects and retains personal information on even one Massachusetts resident. Under this CMR, personal information is defined as a Massachusetts resident's first name (or initial) and last name combined with social security number, driver's license number (or state-issued ID card), or financial account number (including credit or debit card number). 201 CMR 17.00 is designed to safeguard the personal information of Massachusetts residents by defining standards for collecting and handling this data, both physically and electronically.

Basic provisions of 201 CMR 17.00:

- Develop and maintain a comprehensive, information-security program that limits the amount of personal information collected and retained, and restricts access to this information, both inside and outside the organization
- Identify all possible locations where personal information is stored and restrict both physical and electronic access to these locations
- Monitor the information-security program regularly and review the scope of its security measures at least annually
- Document and review all breaches of information-security policy
- Take disciplinary measures when a breach of security occurs

It also states these computer-system-security requirements relative to personal information use:

- Provide secure, restricted access and require authentication to all computer systems
- Encrypt all records transmitted wirelessly or over a public network (i.e.: the Internet)
- Encrypt all personal information stored on portable devices (like notebook computers)
- Protect all computers connected to the Internet with a firewall, patch these computers regularly, and deploy and maintain malware-resistant utilities on these computers
- Monitor computer systems for unauthorized use or access to personal information
- Educate and train employees on these security measures

[Http://www.mass.gov/?pageID=ocamodulechunk&L=1&L0=Home&sid=Eoca&b=terminalcont&f=idtheft\\_201cmr17&csid=Eoca](http://www.mass.gov/?pageID=ocamodulechunk&L=1&L0=Home&sid=Eoca&b=terminalcont&f=idtheft_201cmr17&csid=Eoca) documents 201 CMR 17.00 in its entirety.

Please call Bryley Systems at 888.280.5799 for information on complying with 201 CMR 17.00, or join one of our upcoming, free seminars on this topic.

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Client service

If you have questions about, or issues with, our client service or response, please contact Beverley Denio, Service Manager, at 978.562.6077 x201, or Gavin Livingstone, President, at 978.562.6077 x215. Respective email addresses are [BDenio@Bryley.com](mailto:BDenio@Bryley.com) and [GLivingstone@Bryley.com](mailto:GLivingstone@Bryley.com).

#### Bryley's Client-Service Portal

Over the past few years, Bryley has made significant investments in our business systems and infrastructure to enable real-time communications regarding the timeliness and quality of services that we deliver. A result is that client-service requests (with resulting service tickets) may now be added, viewed, or updated through our Client-Service Portal.

This real-time environment is available 24 x 7 at [www.Bryley.com](http://www.Bryley.com) by selecting "Client login" from the upper-right corner of the home-page. Registered users may perform these functions:

- View the current status and details of their service tickets
- Enter new service requests
- Review service invoices
- View reports

To use this capability, please contact Beverley at 978.562.6077 x201 to setup an account and receive training.

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Contact Bryley Systems Inc.

Bryley Systems is a full-service, end-to-end provider of business-technology solutions, fulfilling the information-technology needs of organizations throughout New England since 1987. We cultivate new, and retain existing, long-term relationships with clients by becoming, and remaining, vital to the operation of their businesses. Areas of expertise:

- Computer networks
- Network security
- Telephone systems

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