2022 Risk Mitigation Plan Highlights Appendix

Safety and Security

Several activities related to safety and security have taken place and are planned.

- The CCCS Director of Emergency Management is conducting hazard vulnerability reviews at all colleges this year. Risk mitigation plans from previous hazard vulnerability reviews and comprehensive security surveys continue to be monitored and updated. Details of these assessments are shared with the Board annually in Executive Session, generally in February.
- Training continues to occur at the System Office and the colleges as appropriate to ensure staff are prepared and trained in the event of an emergency.
- To prepare for a disaster, stand-by emergency contracts were negotiated, a system resource list was developed, and facility use agreements were negotiated. An emergency management finance policy is in process.
- The continued COVID-19 response has included hotline calls as necessary to discuss changing guidance at the State and Federal level, stimulus funds received during the pandemic, purchase of personal protective and HVAC equipment and needed adjustments to policies and procedures among other things. Additionally, after action reviews from the COVID-19 response are occurring.

Financial Aid

In order to reduce the risks related to financial aid, the following activities are in process.

- Advocacy for increased financial aid availability and foundation partnerships. In addition, in spring 2022, a two-year pilot program was launched for Concurrent Enrollment students which is intended to cover costs not paid by school districts.
- Task forces and meetings to discuss changing financial aid regulations, best practices, and ensuring programs continue to meet requirements for financial aid.
- Centralized processing at the System Office for five rural colleges and colleges with temporary shortages and staff turnover, which includes the addition of another financial aid team member. A handbook for new financial aid directors is also being developed. Reports to detect potentially fraudulent student financial aid applications are in use.
- A course to program of study review was completed. Colleges continue to update their advising processes and communication plans to advise students when courses they enroll in are not eligible for financial aid.

Compliance with Program and Regulatory Requirements

As this risk is broad, several initiatives have taken place or are planned to ensure the System remains compliant with program and regulatory requirements.

- Training on regulatory requirements continues including those applicable to the Clery Act, American with Disabilities Act (including accessibility requirements) and Title IX requirements. A SharePoint was created for Title IX Coordinators to share resources across the system and several new templates were created.
- Various monitoring functions, including Higher Education Emergency Relief Funds (HEERF) audits, follow up-on corrective action from Clery Act compliance audits, and Perkins monitoring reviews are performed to ensure compliance with program and regulatory requirements.
- The System is developing grant process templates to assist colleges in procuring, managing, and closing grants. Training was conducted for the Controllers and Business Officers functional groups on grant compliance and management.
- Progress continues to be made in document and course accessibility. ReadSpeaker allows text-to-speech technology to be embedded in all content within D2L and the single D2L instance allows the colleges to better meet accessibility requirements.

Information Security

The Information Technology department continues to make progress on several projects to ensure data is stored and transmitted safely.

- The Information Technology Security Project is on-going. 24/7 cybersecurity monitoring is occurring. The security plan and incident response plan have been drafted and are in various states of implementation. In FY 2022 CCCS-IT improved the Cisco AnyConnect VPN solution by adding Multi-Factor Authentication and incremental security improvements.
- Consolidation to a single shared tenant is in process. All employees have been consolidated. Students from all colleges will migrate by January 2024.
- Cybersecurity policies are being developed and implemented. Board Policy 6-10 was approved, and the associated system procedures are in process. Most procedures will be in place by the end of Fiscal Year 2023. A cybersecurity audit is planned for Fiscal Year 2023 and a vendor was selected in November 2022. CCCS participates in security training and conferences to identify and establish security best practices and continually evaluates tools to improve security infrastructure.
- Ongoing training, including regular email reminders, for System Office and college staff is provided covering phishing, passwords, safeguarding, and protecting data

in addition to other topics. Compliance with the training is presented to the presidents annually.