2021 Risk Mitigation Plan Highlights Appendix

Safety and Security

A number of activities related to safety and security have taken place and are planned.

- The continued COVID-19 response has included frequent hotline calls to discuss changing guidance at the State and Federal level, the provision of remote and hybrid learning, stimulus funds received during the pandemic, purchase of personal protective equipment and needed adjustments to policies and procedures among other things. Additionally, after action reviews from the COVID-19 response are occurring.

- The CCCS Director of Emergency Management continues to work with the colleges to develop and implement risk mitigation plans from hazard vulnerability reviews and comprehensive security surveys. 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 and facility use agreements are being evaluated. An emergency management finance policy is in process, and a resource list has been developed.

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 will be 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. A handbook for new financial aid directors is also being developed along with reports to detect potentially fraudulent student financial aid applications.

Compliance with Program and Regulatory Requirements

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

- New policies for Title IX compliance were adopted in the summer of 2020 to ensure compliance with new regulations and the System executed a Memorandum of Understanding (MOU) to utilize State of Colorado Administrative Court Judges for hearing officers.

- Training on regulatory requirements continues including those applicable to the Clery Act, American with Disabilities Act (including accessibility requirements) and Title IX requirements.

- Various monitoring functions, including Higher Education Emergency Relief Funds audits, follow up-on corrective action from Clery Act compliance audits, Perkins monitoring reviews are performed to ensure compliance with program and regulatory requirements.

- The System is developing a grant compliance checklist to assist colleges in procuring, managing and closing grants.

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 Fiscal Year 2021, CCCS completed the transition from Pulse Secure to AnyConnect VPN and plans to improve the AnyConnect VPN by adding multi-factor authentication in 2022 to improve access and implement stronger controls.

- Consolidation to a single shared tenant is in process. Through the request for proposals process, Cloud Security was selected for the single shared tenant project and work begins in early FY 2022. All colleges will migrate by June 30, 2022.

- Cybersecurity policies are being developed and implemented. Board Policy 6-10 was approved and the associated system procedures are in process. A cybersecurity audit is planned for Fiscal Year 2022 after completion of the cybersecurity policies and procedures. 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.