

STATE BOARD FOR COMMUNITY COLLEGES AND OCCUPATIONAL EDUCATION

February 8, 2023

TOPIC: Board Policy 6-20, Personally Identifiable Information Security Program

PRESENTED BY:

Angela Gramse, General Counsel

Julie Ouska, Chief Information Officer, Vice Chancellor of Information Technology

RELATIONSHIP TO THE STRATEGIC PLAN:

Transform the student experience; Create education without barriers through transformational partnerships; Redefine our value proposition through accessibility, affordability, quality, accountability, resource development, and operational excellence.

EXPLANATION:

There are several federal and state laws that require the Colorado Community College System (CCCS) to implement and maintain a program to safeguard personally identifiable information (PII), including, but not limited to, student education records, student financial information, and protected health information.

Board Policy (BP) 6-20, “Personally Identifiable Information Security Program” is a high-level compliance policy that will promulgate to the System Chancellor the authority to oversee the PII program, which will implement reasonable administrative, technical, and physical safeguards to protect the security, confidentiality, and integrity of PII.

Additionally, the program will focus on protecting against any anticipated threats to the integrity of such information and against unwarranted, unlawful, or unauthorized disclosure, misuse, alteration, or compromise of PII.

Currently, there is a policy on the “Gramm-Leach-Bliley Act” (GLBA) (BP 4-100), that implemented a security program, very much intended to protect PII, as this new program will do. Since BP 6-20 will include compliance to the GLBA, CCCS is recommending this policy carry-over the historical policy reference of BP 4-100 for audit assurance purposes.

The attached BP 6-20 reflects the substantive as well as non-substantive, editorial, or conforming changes. A redline version showing the details of all revisions is available upon request.

RECOMMENDATION:

CCCS Staff recommends the Board approve the re-numbering and re-titling of BP 4-100 to BP 6-20 and further approve the revisions made to BP 6-20.

ATTACHMENT(S):

BP 6-20 Final