2023 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 conducted hazard vulnerability reviews at all colleges. Risk mitigation plans from those hazard vulnerability reviews are being updated. Physical security assessments will be conducted in Fiscal Year 2024. 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. Training includes active shooter response, mental health first aid, bleeding control, and psychological first aid.

- To prepare for a disaster, stand-by emergency contracts were negotiated, a system resource list was developed, facility use agreements were negotiated, and an emergency management finance policy was created.

- A critical incident recovery planning template has been drafted to provide resources for presidents and senior leadership.

Financial Aid

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 and is in progress for Concurrent Enrollment students which is intended to cover costs not paid by school districts.

- Task forces and meetings continue to discuss changing financial aid regulations, best practices, and ensuring programs continue to meet requirements for financial aid. The coming years will see significant changes to financial aid processes due to the FAFSA Simplification Act.

- 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. An FTE was added to allow the System Office to better support the colleges.

- The System continues to provide centralized training and documentation of processes. Reports to detect potentially fraudulent student financial aid applications are in use.

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:

- Centralization of Title IX investigations to ensure compliance with regulations and consistency in the Title IX process.

- Progress continues to be made in document and course accessibility. Training and a template were provided to ensure accessibility of documents used in remote learning. Digital accessibility is being reassessed due to House Bill 21-110 and SP 3-125g may be updated in Fiscal Year 2024.

- 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) audit follow up, Civil Rights monitoring reviews, and Perkins monitoring reviews are performed to ensure compliance with program and regulatory 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 and revision. In Fiscal Year 2024, Multi-Factor Authentication will be expanded.

- Consolidation to a single shared tenant is complete. The consolidation will allow IT to analyze activities across colleges and use information to enhance our security posture. System and college-owned devices will be encrypted in Fiscal Year 2024.

- Cybersecurity policies are being developed and implemented. Board Policy 6-20 was approved, and the associated system procedures are in process to protect personally identifiable information. A cybersecurity audit occurred in Fiscal Year 2023. Findings from that audit are being resolved. 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.