

Southwest Texas Junior College
2401 Garner Field Road
Uvalde, Texas 78801
830-278-4401

April 7, 2021

Mark A. Poehl, Assistant Commissioner
Internal Audit and Compliance
Texas Higher Education Coordinating Board
1200 E. Anderson Lane
Austin, TX 78752

Dear Mr. Poehl,

Southwest Texas Junior College respectfully submits its response to *A Compliance Monitoring Desk Review of Formula Funding at Southwest Texas Junior College*, Report No. THECB-CM-FF-21-010. On the following pages, SWTJC has responded to the two findings related to information technology controls resulting from this desk review. Southwest Texas Junior College would like to thank you and your staff assigned to our college for their courtesy and professionalism exhibited during the audit.

Sincerely,

Dr. Hector Gonzales, President
Southwest Texas Junior College

1. Information technology processes and controls over student information system enrollment data should be strengthened.

Southwest Texas Junior College utilizes Ellucian Colleague as its student management system. Colleague does include transaction logging capabilities. A limited amount of transactional data was available for the time period requested during the desk review, however, these transactions were confined to Personal Identifiable Information, i.e. social security number, date of birth and gender. SWTJC was unable to produce audit logs or change history for critical formula funding data.

On February, 22, 2021, Southwest Texas Junior College staff met with an Ellucian Colleague representative regarding the setup and implementation necessary to capture transactional data. Although this process does not allow SWTJC to audit retroactively, as of 2/22/2021, transactional data related to formula funding is now being captured.

Further, supported by the Family Educational Rights and Privacy Act (FERPA) Title 34, Code of Federal Regulations, Subtitle A, Part 99, Subpart D, Section 99.31 [34 CFR 99.31(a)(1)(ii)] and Texas Administrative Code Title 1, Part 10, Chapter 202, an internal committee of Administrators and staff, who encompass multiple departments across the college has been formed. This committee will continue the work towards maintaining the integrity of system information, and ensuring the reliability of data. Additionally, SWTJC has hired a programmer to develop a report based upon the spreadsheet provided by Elizabeth Steele, Compliance Specialist, Texas Higher Education Coordinating Board. This report will guide internal audits of Southwest Texas Junior College student management system data.

2. Information technology processes and controls over security access to the student information system should be strengthened to ensure compliance with the Texas Administrative Code Section §202.76.

Southwest Texas Junior College has not met the security standards requirement established by the Department of Information Resources (DIR) for institutions of higher education. SWTJC is required to perform an audit against its Information Security Controls every two years to comply with Texas Administrative Code Section §202.76. As of April 7, 2021, Southwest Texas Junior College has not performed a comprehensive or formalized information security review over student information.

To ensure compliance with Texas Administrative Code Section §202.76, SWTJC created the position of Information Security Officer (ISO). The position was filled on October 1, 2019. The ISO was in contact with the DIR

concerning priorities and scheduling of the security plan, risk assessments and Texas Cybersecurity Framework (TCF) audit. These communications were utilized in prioritizing and scheduling required tasks.

In an email exchange with a DIR representative beginning November 7, 2019 and concluding November 8, 2019, email enclosed, the SWTJC ISO was informed that the college came under the state information security standards on 09/01/2019. This coupled with the knowledge that the TCF audit was due every two years, SWTJC prioritized the TCF audit with a completion date prior to 09/01/2021. The completion date of September 1, 2021 was confirmed in subsequent conversations during the Information Security Forum in March 2020. The required Texas Cybersecurity Framework Audit will begin 06/01/2021, with completion on 08/06/2021, and will occur biennially.



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April 1, 2021

Dr. Hector Gonzales, President
Southwest Texas Junior College
2401 Garner Field Road
Uvalde, TX 78801

Dear Dr. Gonzales,

I am attaching the draft report for management response on *A Compliance Monitoring Desk Review of Formula Funding at Southwest Texas Junior College*, Report No. THECB-CM-FF-21-010. There were two findings related to information technology controls resulting from this engagement. I ask that you review the report and provide a response to the recommendations by April 16, 2021. Your response will be included in the final report.

Summary

Information security controls over student enrollment information at Southwest Texas Junior College require improvement. Audit trails over key enrollment data such as class meeting days and times must be established to ensure the reliability and integrity of data used for formula funding decision making purposes. Therefore, our original review objectives, including a determination of the accuracy of contact hours reported by Southwest Texas Junior College, were unable to be met.

A follow up audit will be performed to evaluate Southwest Texas Junior College's information security controls. This will serve as a basis for future base period assessments of the accuracy of contact hours reported for formula funding purposes.

This Compliance Monitoring report will be presented to the Texas Higher Education Coordinating Board (THECB) Committee on Agency Operations, a standing committee of the THECB Board, on July 22, 2021.

The cooperation of your staff during this review is greatly appreciated. If you have any questions or comments, please let me know.

Sincerely,

Mark A. Poehl, CPA, CIA, CISA, CFE
Assistant Commissioner, Internal Audit and Compliance

Detailed Observations, Recommendations and Management's Responses

1. Information technology processes and controls over student information system enrollment data should be strengthened.

Information technology processes and controls over student information system enrollment data should be strengthened. Although Southwest Texas Junior College has policies and procedures in place to limit access to information systems, the student information system does not provide audit logs or change history for critical formula funding data, including:

- Credit hours
- Lab hours
- Lab contact hours
- Instruction mode
- Meeting times
- Lecture hours
- Lecture contact hours
- Type of instruction
- Meeting days
- Instructor of record

Audit logs provide documentary evidence to track a sequence of events, and the ability to monitor unauthorized system use or unusual activity. Without audit logs, maintaining the integrity of system information, and ensuring the reliability of data is limited.

Family Educational Rights and Privacy Act (FERPA) Title 34, Code of Federal Regulations, Subtitle A, Part 99, Subpart D, Section 99.31 [34 CFR 99.31(a)(1)(ii)] requires that "An educational agency or institution must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate educational interests." Security standards (Texas Administrative Code Title 1, Part 10, Chapter 202) established by the Department of Information Resources (DIR) for institutions of higher education are becoming a phased – in requirement for Community Colleges and provide a comprehensive basis for strengthening information security.

Recommendation:

Capture and retain student information system audit logs or change history for the critical data used for formula funding.

Management Response:

The response will be inserted here.

2. Information technology processes and controls over security access to the student information system should be strengthened to ensure compliance with the Texas Administrative Code Section §202.76.

Information technology processes and controls over security access to the student information system should be strengthened to ensure compliance with the Texas Administrative Code Section §202.76. There has not been a comprehensive or formalized information security review performed over the student information system at Southwest Texas Junior College. Southwest Texas Junior College has not met the security standards requirement established by the Department of Information Resources (DIR) for institutions of higher education.

The Texas Administrative Code, Section §202.76(c) states that “a review of the institution’s information security program for compliance with these standards will be performed at least biennially....”

Enhanced oversight of the College’s student information system and compliance with statutory requirements provides greater assurance that student information security and data integrity are achieved.

Recommendation:

Strengthen oversight of student information security and comply with Texas Administrative Code §202 and DIR security standards.

Management Response:

The response will be inserted here.

PERFORMED BY:

Ms. Elizabeth Steele, Compliance Specialist

CC:

THECB

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