

Date of Board Meeting: September 19, 2023

Subject: Cybersecurity Staff Augmentation

Recommendation: Approve the contract with Strata Information Group to provide staff augmentation services for Cybersecurity.

Background and Rationale:

In compliance with Texas DIR requirements, each institution of higher education must have staff that is dedicated to the oversight and management of cybersecurity efforts. In recent years, the College has utilized contract services with third-party vendors to attend to the cybersecurity needs of the institution. In preparation for the need for a new contract, the College solicited and received information from two (2) vendors regarding their cybersecurity services: Strata Information Group and Columbia Advisory Group. Both Strata Information and Columbia Advisory currently have cooperative purchasing contracts that would allow us to sign an agreement without going out for formal bids.

The services quoted by each party include:

- SIG: vCISO Services @ \$6,720/month for 6 months = \$40,320
- CAG: vCISO Services @ \$5,750/month for 12 months = \$69,000


Although the cost per month is more for SIG services, the service provided through SIG is more comprehensive, including designated staff support, comprehensive documentation development for upcoming FY 24 cybersecurity audit, and comprehensive testing and monitoring of all systems.

Cost and Budgetary Support: \$40,320 (ARP Funds)

Strategic Priority Alignment: Student Success Community Impact
 Resource Optimization Institutional Excellence

Resource Person(s): Amanda Allen, Ed.D.; Vice President of Strategy, Enrollment Mgmt, and Technology

Signatures:

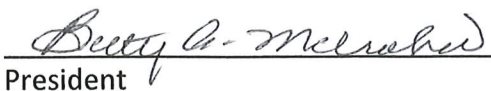


Cabinet-Level Supervisor *B. Allen*

Sept 11, 2023

Date

President's Approval:



President

9-11-23

Date



General Information:

Client Name:	Wharton County Junior College
Client Representative:	Amanda Allen/ Email: allena@wcjc.edu Robby Mathews/ Email: robbym@wcjc.edu
Strata Representative:	Allison Leonard / Email: allison@sigcorp.com Brian Kirk / Email: kirk@sigcorp.com
Project Name:	Wharton County Junior College - vCISO
Description of Work:	The proposed service is for 6 hours of engagement (24 hours per month) per week for 6 months. Wharton County Junior College will have the option to extend the service for an additional 6 months at their discretion provided they give 6 weeks' notice before the end of the agreement (to allow SIG to staff for the engagement). The engagement is to be conducted via remote connection.

Cost Summary

ITEM	RATE TYPE	RATE	QUAN.	TAX	AMOUNT
vCISO Services	Flat Fee	\$6,720.00	6	\$0.00	\$40,320.00
				Sales Tax	\$0.00
				Total Cost:	\$40,320.00

Notes:

- Costs are based on client current contract rates; rates may increase based on the term of the underlying contract.
- SIG will bill monthly for services. Payments are due Net 30 days.
- Costs exclude all state taxes, if applicable, unless otherwise noted.
- Includes engagement management, preparation time, labor, and the development of engagement reports.
- All prices are quoted in USD, unless otherwise noted.

Detailed Description:

SIG proposes to assist Wharton County Junior College (WCJC) with a vCISO service that provides strategic direction for its security program. After discussions with WCJC staff our initial focus of this engagement will be around compliance with the recently announced FTC Safeguard rule requirements as well as Texas Administrative Code 202 for higher education.

SIG will work with WCJC staff to analyze compliance with the FTC Safeguards and Texas Administrative Code 202 to development an initial gap analysis and prioritized roadmap of projects that will be the basis of consulting activity over the 6-month engagement. Once the gap assessment is complete, SIG will assist WCJC by updating and creating appropriate policies and procedures in accordance with requirements and gaps identified. SIG will also work with internal teams and third parties to address technical gaps in the WCJC program. Regular cadence and status calls will be held with WCJC staff to review status and adjust priorities. SIG will work to remediate gaps in compliance against the 9 elements that the FTC has stipulated must be included in an organization written information security program (WISP). Those 9 elements are highlighted here (the C.F.R. numbers referenced below are direct references to the FTC Safeguards rule published online):

- **Element 1:** Designates a qualified individual responsible for overseeing and implementing the institutions or servicer's information security program and enforcing the information security program (16 C.F.R. 314.4(a)).
- **Element 2:** Provides for the information security program to be based on a risk assessment that identifies reasonably foreseeable internal and external risks to the security, confidentiality, and integrity of customer information (as the term customer information applies to the institution or servicer) that could result in the unauthorized disclosure, misuse, alteration, destruction, or other compromise of such information, and assesses the sufficiency of any safeguards in place to control these risks (16 C.F.R. 314.4(b)).
- **Element 3:** Provides for the design and implementation of safeguards to control the risks the institution or servicer identifies through its risk assessment (16 C.F.R. 314.4(c)). At a minimum, the written information security program must address the implementation of the minimum safeguards identified in 16 C.F.R. 314.4(c)(1) through (8).
- **Element 4:** Provides for the institution or servicer to regularly test or otherwise monitor the effectiveness of the safeguards it has implemented (16 C.F.R. 314.4(d)).
- **Element 5:** Provides for the implementation of policies and procedures to ensure that personnel can enact the information security program (16 C.F.R. 314.4(e)).
- **Element 6:** Addresses how the institution or servicer will oversee its information system service providers (16 C.F.R. 314.4(f)).
- **Element 7:** Provides for the evaluation and adjustment of its information security program considering the results of the required testing and monitoring; any material changes to its operations or business arrangements; the results of the required risk assessments; or any other circumstances that it knows or has reason to know may have a material impact the information security program (16 C.F.R. 314.4(g)).
- **Element 8:** For an institution or servicer maintaining student information on 5,000 or more consumers, addresses the establishment of an incident response plan (16 C.F.R. 314.4(h)).
- **Element 9:** For an institution or servicer maintaining student information on 5,000 or more consumers, addresses the requirement for its Qualified Individual to report regularly and at least annually to those with control over the institution on the institution's information security program (16 C.F.R. 314.4(i)).

It should be noted that these policy elements also overlap with Texas Administrative Code 202 and will assist compliance with these requirements. After assisting with the written information security program requirements above, and noting gaps, SIG will assist WCJC in subsequent months with working on technical gaps that exist in its program.

Additional functions provided as part of SIG's ongoing vCISO engagements:

- Review of internal/external security posture and firewall rules
- Evaluation of network architecture with recommendations provided on security enhancements/improvements
- Assistance with evaluating and negotiating vendor contracts and pricing
- Assistance with evaluating products and services needed to improve the College cybersecurity posture
- Review of cloud, endpoint protection, and firewall implementations against industry best practices
- Assistance with identifying relevant threats and risks as part of the College's risk management program
- Training existing WCJC team members on cybersecurity best practices, policy creation, project management, and technical cybersecurity controls
- Weekly meetings to review accomplishments and focus areas for the next week of activity