May 14, 2010

District Director of Internal Audit
Alamo Colleges
San Antonio, Texas

RE: Student Information System Plus Security Processes and Controls Review Corrective Action Plan Revised

Alamo Colleges' Management has reviewed the report and related recommendations for this project. We appreciate the depth of information provided by the audit team, and that it will be valuable in evaluating the recommended improvements. As the most extensive audit of the SIS Plus and Series Z Security Software access processes and controls, there are many challenges to address which will require prioritization and allocation of resources. Substantial consideration will be given to the business process reengineering already approved for the Banner Student and Financial Aid Module implementations. To the extent possible, adjustments will be made to strengthen and/or mitigate issues noted.

Responses summarized below follow the audit’s recommendations acknowledging acceptance of the ideas presented. In addition, we designated a sponsor for each accepted recommendation and indicated an expected implementation or completion date. When appropriate, we explained a reason for declining an audit recommendation and provided alternative action strategy to address the issue. Risk factors and rankings noted for each recommendation will clarify for all interested parties the prioritization and resource commitments needed.

Dr. Thomas Cleary
Vice Chancellor for Planning, Performance and Information Systems

Dr. Adelina Silva
Vice Chancellor for Student Success

Diane Snyder
Vice Chancellor for Finance and Administration
### RECOMMENDATIONS

<table>
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<th>Description</th>
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<tr>
<td>1</td>
<td>Propose that the Board of Trustees approve a new policy to adopt and implement a formal internal control framework, preferably the Committee of Sponsoring Organizations Enterprise Risk Management (COSO ERM) Framework.</td>
<td>C, VCSS, VCFA, VCPPIS</td>
<td>6</td>
<td>Partially Accept</td>
<td>D. Snyder, VCFA</td>
<td>Reassess by Aug. 2011</td>
<td></td>
<td></td>
<td>BP, PO</td>
<td>F, I, S</td>
<td>H</td>
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**Action plan:**
As responded to in previous audits, the adoption of COSO Risk Management would be a major undertaking and would divert resources away from other high priority initiatives. We need to balance operational performance with internal controls. Management is consistently engaged in risk assessment, risk response, monitoring and control objectives, and the associated mitigation strategies. While we agree that COSO would provide more formality to these efforts, this is not currently a high-priority/high-impact initiative for the enterprise. This recommendation will be reassessed after Banner systems and processes are fully deployed at end of FY11.

| 2 | Require compliance with the Family Educational Rights and Privacy Act (FERPA).  
   - Use an identifying code other than the student SSN.  
   - Log all access to the regulatory designated sensitive student data. | C, VCSS, VCFA, VCPPIS | 6                 | Accept                           | D. Snyder, VCFA                | Sept 2010                 |                                |                | BP, PO, PR, SI | A, F, N, S | H          |

**Action plan:**
The new Banner System assigns students unique identifiers to replace the social security number. This will provide additional controls over student personal data.

| 3 | Require compliance with the Texas Administrative Code (TAC), Title 1, Part 10, Chapter 202, Subchapter C Information Security Standards for Higher Education. | C, VCSS, VCFA, VCPPIS | 6                 | Accept                           | D. Snyder, VCFA and T. Cleary, VCPPIS | December 2010 |                                |                | BP, PO, PR, SI | A, F, N, S | H          |

**LEGENDS:**

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  - VCSS = Vice Chancellor for Student Success
  - VCFA = Vice Chancellor for Finance and Administration
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  - SFS = Student Financial Services Management
  - ITS = Information Technology Services Management

- Issue Types:
  - BP = Business Process
  - PO = Board Policy
  - PR = Management Procedures
  - SI = Specific Internal Control
  - TE = Technical
  - M = Financially material

- Risk Factors:
  - A = Noncompliance - Alamo Colleges' policies/procedures
  - N = Noncompliance - Federal or Texas laws/regulations
  - D = Likelihood that it would not be detected
  - R = Likelihood of repetition if not corrected
  - S = Significant deficiency
  - I = Significant inefficiency
  - U = Urgent need for corrective action (Less than 90 days)

- Risk Ranking:
  - H = High
  - M = Medium
  - L = Low

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<td>4</td>
<td>Require compliance with the Texas Administrative Code, Title 13, Chapter 6, Section 6.10 Texas State Records Retention Schedule regarding retention of security access and reports.</td>
<td>C, VCSS, VCPIIS</td>
<td>6</td>
<td>Accept</td>
<td>Pamela Ansboury, Assoc. Vice Chancellor</td>
<td>Ongoing</td>
<td></td>
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<td></td>
<td><strong>Action plan:</strong> A detailed review of the Information Security Standards will be performed including reassessing the system access controls by December 2010.</td>
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<td>5</td>
<td>Establish an Information Security Risk Management Office to report to a Vice Chancellor.</td>
<td>C, VCFA, VCPIIS</td>
<td>6</td>
<td>Accept</td>
<td>D. Snyder VCFA and T. Cleary VCPIIS</td>
<td>December 2010</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td><strong>Action plan:</strong> Records Management Officer will roll-out training to further educate employees on records retention requirements. Each department will be asked to identify someone to act as the records point of contact for their department who will partner with the District Records Management Officer to enhance adherence to policies.</td>
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| 6  | Establish an Information Security Risk Management Office to report to a Vice Chancellor.  
   - Have this Office develop, administer, and monitor a District-wide security program which includes establishing policies, regulations and procedures; conducting employee training; ensuring compliance with legal requirements; and performing a risk assessment of information resources. | C, VCFA, VCPIIS | 6 | Accept | D. Snyder VCFA and T. Cleary VCPIIS | December 2010 | | | | | |

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| 7  | Establish an Information Security Risk Management Office to report to a Vice Chancellor.  
   - Ensure that application access standards, which are part of the procedures, are based on role or job responsibilities. | VCSS, VCFA, VCPPIS | 6 | Accept | D. Snyder VCFA and T. Cleary VCPPIS | December 2010 | BP, PR, SI | A, N, R, S | H |
| 8  | Establish an Information Security Risk Management Office to report to a Vice Chancellor.  
   - Allocate sufficient resources, especially for hiring an Information Security Officer, to manage the program. | C, VCFA, VCPPIS | 6 | Accept | D. Snyder VCFA and T. Cleary VCPPIS | December 2010 | BP, PR, SI | A, N, R, S | H |
| 9  | Reevaluate the ownership of student data in SIS Plus and the Banner Modules, and instruct staff on their responsibilities using TAC Rule 202.71 as a guide. | C, VCSS, VCFA, VCPPIS | 6 | Accept | T. Cleary VCPPIS | Completed | BP, PR | A, I, N, S | H |

**Board policy has already established data owners. Banner Security Procedures will define data custodians for all Banner modules.**

| 10 | Implement a continuous communication plan for employees regarding access changes and on-going reviews of security levels to avoid creating negative perceptions. | C, VCSS, VCFA, VCPPIS | 6 | Accept | D. Snyder VCFA and T. Cleary VCPPIS | December 2010 | BP, PR | A, N, R | M |

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**Alamo Colleges Management's Responses:**
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<tr>
<td>11</td>
<td>Remove the Passport Application from computers that are located in common areas such as the Welcome Centers and labs.</td>
<td>VCSS, VCFA</td>
<td>6</td>
<td>Partially Accept</td>
<td>Roger Castro, CIO</td>
<td></td>
<td></td>
<td></td>
<td>BP, PR, TE</td>
<td>D, R, S</td>
<td>M</td>
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**Action Plan:**
The Passport application on a workstation does not provide automatic access to SIS and VM/CMS. Further authentication is required. Removal of this could negatively impact service delivery to students by college personnel. The VPSS and college administration will need to weigh in on this impact.

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<td>12</td>
<td>Ensure that SFS Department employees have appropriately segregated job responsibilities particularly the SFS District-NEC Programmer and limit their SIS Plus access to assigned duties</td>
<td>VCSS; SFS, ITS</td>
<td>6</td>
<td>Accept</td>
<td>D. Snyder VCFA</td>
<td>Ongoing</td>
<td></td>
<td></td>
<td>BP, PO</td>
<td>F, N, S</td>
<td>H</td>
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**Action Plan:**
Data access roles with proper segregation of duties will be defined in all Banner modules; and data owners for each module will approve employee access requests based upon job responsibilities.

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<td>13</td>
<td>Clarify the IT Security Officers' role and job duties.</td>
<td>VCPPIS, ITS</td>
<td>6</td>
<td>Accept</td>
<td>D. Snyder, VCFA and T. Cleary</td>
<td>VCPPIS</td>
<td>December 2010</td>
<td></td>
<td>BP, PR</td>
<td>I, S</td>
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**Action Plan:**
The IT Security Officer's duties are spelled out in his job description. The ITSO reports to executive management. His job description will be reviewed for currency and relevancy to include auditing of IT related functions. See also #5.

| 14 | Clarify the IT Security Officers' role and job duties.                      | VCFA, VCPPIS, ITS    | 6                 | Accept                            | D. Snyder, VCFA and T. Cleary | VCPPIS         | December 2010                     |                | BP, PR     | I, S        | M           |

**Action Plan:**
See #5.

| 15 | Clarify the IT Security Officers' role and job duties.                      | VCPPIS, ITS          | 6                 | Accept                            | D. Snyder, VCFA and T. Cleary | VCPPIS         | December 2010                     |                | BP, PR     | I, S        | M           |

**Action Plan:**
See #5.

| 16 | Clarify the IT Security Officers' role and job duties.                      | VCPPIS, ITS          | 7                 | Accept                            | D. Snyder, VCFA and T. Cleary | VCPPIS         | December 2010                     |                | BP, PR     | I, S        | M           |

**Action Plan:**
See #5.

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<td>17</td>
<td>Immediately take steps to mitigate the risks identified in this report.</td>
<td>VCSS, VCFA, VCPPIS, ITS</td>
<td>7</td>
<td>Accept</td>
<td>Roger Castro, CIO</td>
<td>Ongoing</td>
<td>BP, PR</td>
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<td><strong>Action Plan:</strong></td>
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<tr>
<td><strong>See #5.</strong></td>
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### Action Plan:

**Resolve as new Banner modules are implemented.**

| 18 | Immediately take steps to mitigate the risks identified in this report:  
- Remove access to production data by the ITS Department personnel. | ITS | 7 | Partially Accept | D. Snyder VCFA and T. Cleary VCPPIS | December 2010 | PR, SI | F, R, S | H |
| **Action Plan:** | | | | | | | | | |
| **See #5 and #19.** | | | | | | | | | |

### Action Plan:

**Provide ITS staff who require access to SIS Plus, such as the Helpdesk personnel, individual Operator IDs and passwords; changes should be monitored for all ITS Department employees.**

| 19 | Immediately take steps to mitigate the risks identified in this report:  
- Provide ITS staff who require access to SIS Plus, such as the Helpdesk personnel, individual Operator IDs and passwords; changes should be monitored for all ITS Department employees. | ITS | 7 | Decline | T. Cleary VCPPIS | | BP, TE | I, R, S | M |

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| 20 | Immediately take steps to mitigate the risks identified in this report  
   - Assign unique Operator IDs to every SIS Plus User, and disable generic/unknown Operator IDs. | ITS         | 7                 | Decline                          | T. Cleary VCPIIS                |                                     | BP, PR              | A, D, F, R, M | M          |             |             |
| 21 | Prevent the reuse of Operator IDs within a specified time period, usually two fiscal years. | ITS         | 7                 | Accept                           | Roger Castro, CIO               | September 2010                     | BP, PR              | D, F, R      | M          |             |             |
| 22 | Delete access for employees who no longer work for Alamo Colleges.           | ITS         | 7                 | Accept                           | Roger Castro, CIO               | Ongoing                            | BP                  | A, D, F, N, R | H          |             |             |
| 23 | Implement the SIS Plus ZBA120 Report known as “On-Line Audit Before/After Change Report” for System 000 (Security Administration) for all college databases and run these reports daily until Banner conversion. | ITS, SFS    | 7                 | Decline                          | T. Cleary VCPIIS                |                                     | BP, TE              | I, R, S      | H          |             |             |

**Action Plan:**
- The effort to achieve this will divert resources from meeting implementation commitments with Banner (we will be retiring the SIS Plus System). This issue will be attended to in Banner.
- Will comply with this recommendation with Banner’s implementation.
- District ITS acts on triggers supplied by Human Resources. These triggers will be greatly enhanced with the introduction of Banner HR workflows.

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<td>24</td>
<td>Implement the SIS Plus ZBA120 Report known as “On-Line Audit Before/After Change Report” for System 001 (SIS Plus System) for all college databases and run these reports daily until Banner conversion.</td>
<td>ITS, SFS</td>
<td>7</td>
<td>Decline</td>
<td>T. Cleary VCPPIS</td>
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<tr>
<td>25</td>
<td>Develop formal detailed security procedures for administrating SIS Plus access, including terminated, retired and transferred employees until an Information Security Risk Management Office is established.</td>
<td>ITS, SFS</td>
<td>7</td>
<td>Partially Accept</td>
<td>Roger Castro, CIO</td>
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### Action Plan:

This report is not requested by functional management and requires significant modification to the ZSS core module (System 000). System 001 is the Student Module (SIS Plus System). ITS has no intention to invest time and fiscal resources into a system that is schedule for decommission.

### Action Plan:

This report is not requested by functional management and requires significant modification to the ZSS core module (System 000). System 001 is the Student Module (SIS Plus System).

### Action Plan:

Formal detailed procedures do exist. A formal process detailing employee movement needs to be developed and must be coordinated with HR. Banner workflows should address this issue. This is a shared responsibility between ITS, HR and the data custodians. All must be made aware of employee movement.

### Action Plan:

Disable queries and scripts used by individuals to obtain student information using the Virtual Machine/Conversational Monitor System (VM/CMIS) and/or the Terminal Productivity Executive (TPX) Application.

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### RECOMMENDATIONS

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<th>#</th>
<th>Description</th>
<th>Directed To</th>
<th>Audit Report Page</th>
<th>Accept, Partially Accept, Decline</th>
<th>Responsible Person’s Name/Title</th>
<th>Completion Date</th>
<th>Projected Savings / Finding Value</th>
<th>Estimated Cost</th>
<th>Issue Type</th>
<th>Risk Factor</th>
<th>Risk Rating</th>
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<tbody>
<tr>
<td></td>
<td>Detailed Report</td>
<td>District Information Technology Services (ITS) Management’s Responses:</td>
<td>Functional users require the use of these scripts to perform these job duties. Impact to student service could be significantly impacted in current Plus system. Scripts should be minimized with the implementation of the new Banner Student and ARGO reporting systems. The IT Security Officer, as part of his annual review of employee access, will assess the availability of these scripts.</td>
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### Summary of Recommendations

Recommendations - 26

- Accepted - 17
- Partially Accepted - 5
- Declined - 4

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**LEGENDS:**

- Directed To:
  - C = Chancellor
  - VCSS = Vice Chancellor for Student Success
  - VCFA = Vice Chancellor for Finance and Administration
  - VCPPIS = Vice Chancellor for Planning, Performance, and Information Systems
  - SFS = Student Financial Services Management
  - ITS = Information Technology Services Management

- Issue Types:
  - BP = Business Process
  - PO = Board Policy
  - PR = Management Procedures
  - SI = Specific Internal Control
  - TE = Technical

- Risk Factors:
  - A = Noncompliance - Alamo Colleges’ policies/procedures
  - D = Likelihood that it would not be detected
  - F = Potential for fraud to occur
  - I = Significant inefficiency
  - M = Financially material
  - N = Noncompliance - Federal or Texas laws/regulations
  - R = Likelihood of repetition if not corrected
  - S = Significant deficiency
  - U = Urgent need for corrective action (Less than 90 days)

- Risk Ranking:
  - H = High
  - M = Medium
  - L = Low