## **State Board for Community and Technical Colleges**

Agency 699

Audit	Finding	Finding and	
Report	Number		Corrective Action Status
1035361	2024-001	Finding:	The State Board for Community and Technical Colleges did not have adequate internal controls over information technology governance of ctcLink.
		Corrective Action:	The State Board for Community and Technical Colleges (Board) has been taking actions to remediate deficiencies of ctcLink since its implementation in the various areas reported in the finding.
			Disaster Recovery and Business Continuity Planning
			The Board implemented the following process to ensure continuity and rapid recovery in the event of system failure:
			<ul> <li>PeopleSoft backup solution to ensure a swift recovery time of approximately 10 minutes for all databases, with the capability to restore data to any point within the past 30 days.</li> </ul>
			Daily backups for further security and data integrity.
			<ul> <li>A robust daily recovery protocol for third-party applications including the Online Admissions Application Portal (OAAP).</li> </ul>
			<ul> <li>Regular testing of the backup and restoration procedures of third-party applications to ensure the process will run smoothly and efficiently and help identify potential issues or bottlenecks that could delay recovery times.</li> </ul>
			<ul> <li>A comprehensive communication plan to promptly inform all stakeholders in the event of an OAAP system disruption to maintain the integrity of the admissions process.</li> </ul>
			The Board will continue to dedicate efforts to provide resilient and reliable services that support the critical functions of community and technical colleges in Washington state.
			Fraud Controls
			The Board has taken comprehensive efforts to address preventative and detection controls for the system, which include:
			<ul> <li>Establishing a fraudulent application subgroup in 2023 with members from the college community to explore additional opportunities for creating system-wide fraud prevention and detection controls within ctcLink.</li> </ul>
			<ul> <li>Collaborating with the Board's vendor partner to provide automated security controls aimed at meeting components of the guidance issued by the Department of Education to address potential fraud in student aid programs that offer distance education programs.</li> </ul>
			<ul> <li>Transitioning the fraudulent application subgroup to the purview of the systemwide Admissions and Registration Council, which is comprised of college enrollment staff and leadership.</li> </ul>
			<ul> <li>Continuing to participate in ongoing discussions and collaboration with the community and technical colleges to build a unified business process across all institutions to mitigate fraud activities effectively.</li> </ul>

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Audit	Finding		Finding and
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1035361	2024-001		End User Training
	(cont'd)		The Board has been making continuous improvement efforts over the past several years:
			<ul> <li>Created multiple Canvas training courses and quick reference guides and conducted numerous instructor-led training courses for the colleges.</li> </ul>
			• Developed and delivered modular onboarding manuals for college use.
			<ul> <li>Released an online training application tracking the progress and completion of ctcLink training courses for staff across all 34 community and technical colleges.</li> </ul>
			<ul> <li>Created and implemented a Controller Handbook and Accounting Manual to provide colleges with standardized accounting practices across all colleges.</li> </ul>
			• Developed a robust set of training offerings for accounting and student financials staff on how to perform specific fiscal-related processes.
			The Board will continue to develop and provide relevant end-user training to ensure consistency and strive for accuracy of information in ctcLink.
			Third Party Monitoring
			To build on the existing provisions in contracts covering data protection, the Board has been actively working to develop a specific data sharing section in recognition of the need for more specificity and attention to the areas of concern.
			As of July 1, 2024, the Board added a "Data Sharing" section to all contracts to ensure all elements required by state law and the standards prescribed by the State Office of Cybersecurity are covered.
		Completion	
		Date:	October 2024, subject to audit follow-up
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