



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

Thomas A. Stith, III
President

NUMBERED MEMO CC22-017

TO: Members of the State Board of Community Colleges
Community College Presidents, Board of Trustees Chairs, Community
College Chief Academic Officers, Chief Admissions Officers, Basic Skills
Directors, Business Officers, Continuing Education Officers, Customized
Training Directors, Distance Learning, Chief Financial Officers, Financial Aid
Officers, Personnel Directors, Student Development Administrators, Public
Information Officers, Registrars, & Other Interested Parties

FROM: Tawanda Foster Artis
NCCCS General Counsel

RE: Proposed Adoption of 1B SBCCC Subchapter 700 – Information
Security Program

DATE: March 23, 2022

The State Board of Community Colleges (“SBCC”) has initiated the rulemaking process to adopt a new subchapter into the State Board Code, **1B SBCCC Subchapter 700 – Information Security Program**. The proposed subchapter will codify existing information security program governance, including the structure of current information technology committees and groups that assist in executing current policies and assessing future technology strategies. The provisions in 1B SBCCC 400.4 that are proposed for repeal, would be recodified as part of the new proposed subchapter.

The proposed subchapter, including the changes, is published on the NC Community College System's website, www.nccommunitycolleges.edu/sbcccode. For your convenience, a copy of the proposed rule, with the changes indicated, is attached to this memorandum. The items bolded (other than the headings), indicate a proposed change that the SBCC approved. “Strikeouts” indicate deletion of prior suggested language.

Any member of the public has the right to submit written comments on the proposed changes. Please note that any person who submits a public comment on behalf of their community college should comply with their college's local process for submitting comments on a proposed rule. **Written comments on the rule must be received by no later than 5:00 p.m. on April 22, 2022.** Any member of the public has the right to request a hearing on the proposed rules. **Requests for a hearing must be received by no later than 5:00 p.m. on April 7, 2022.** Written comments and requests for hearing shall be directed to the following address: Tawanda Foster Artis, 200 W. Jones Street, 5001 Mail Service Center, Raleigh, NC 27699-5001 or by email to **publiccomments@nccommunitycolleges.edu**. Thank you for your attention to this matter.

CC22-017

E-mail Copy Attachments



State Board of Community Colleges Code

Notice of Proposed Rulemaking Form

Date: March 22, 2022

Title, Chapter, Subchapter, and Rule Number of Rule Proposed to be Adopted, Amended, or Repealed	Adopt 1B SBCCC Subchapter 700 – Information Security Program
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Specify whether the SBCC proposes to adopt amend, or repeal a rule:

Adopt
(new rule)

Amend
(change
existing rule)

Repeal
(delete
entire rule)

<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Rationale for proposed adoption, amendment or repeal:	To codify existing information security program governance, including the structure of current information technology committees and groups that assist in executing current policies and assessing future technology strategies. The provisions in 1B SBCCC 400.4 that are proposed for repeal, would be recodified as part of the new proposed subchapter.
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Proposed Effective Date of Rule	June 1, 2022
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1 **State Board of Community Colleges Code**

2
3 **TITLE 1 – COMMUNITY COLLEGES**

4
5 **CHAPTER B. COLLEGE OPERATIONS**

6
7 **SUBCHAPTER 700. INFORMATION SECURITY PROGRAM**

8
9 **1B SBCCC 700.1 - Introduction**

10 All community colleges shall establish, operate, and maintain a local Information
11 Security Program (ISP) to ensure the confidentiality, integrity, and availability of college
12 data, based on classification, and those related information systems and services that
13 are necessary to the support of the mission of the college and the students while
14 maintaining compliance with local, State and federal standards, policies and laws.

15
16 **1B SBCCC 700.2 - Definitions**

17 The following definitions apply to this Chapter.

18 (a) Chief Information Officer (CIO) - Chief information officer (CIO), may also be known
19 as the information technology (IT) director, and is the IT leader at a college who
20 oversees the work related to information technology and computer systems to
21 support college goals.

22 (b) Chief Information Officers Association (CIOA) – Refers to a group of North Carolina
23 community college chief information officers and/or IT leaders who meet regularly to
24 collaborate on IT issues on their campuses.

25 (c) Chief Information Security Officer (CISO) - A chief information security officer (CISO)
26 is the leader responsible for ensuring information assets and technologies are
27 adequately protected.

28 (d) Center for Internet Security (CIS) - CIS is an independent, global nonprofit
29 organization focused on IT security. The community college system utilizes CIS
30 resources as tools to prioritize and track cybersecurity maturity and improvement.

1 (e) Enterprise Resource Planning (ERP) Executive Steering Committee – An advisory
2 committee created to address the legislative mandate to plan and design a
3 modernized ERP for the community colleges. The ERP system must, at a minimum,
4 include student information system, core financial management, grants, human
5 resource management, and payroll.

6 (f) Institutional Information Processing System Users Group (IIPS) – is a group of
7 community college employees, trustees, and friends of the North Carolina
8 Community College System (NCCCS) and/or persons officially associated with the
9 community colleges to promote communications, collaboration, and professional
10 development or educational opportunities among academic and administrative
11 computer users within the North Carolina Community College System.

12 (g) Information Requirements Oversight Council (IROC) -- A working group focused on
13 supporting processes to review, validate, and prioritize enterprise impacting IT
14 projects, Requests for Change (RFCs) and other IT enabled capabilities within the
15 North Carolina Community College System.

16 (h) Information Security Office (ISO) – The System Office team supporting cybersecurity
17 efforts for the college system.

18 (i) Information Technology Security Committee (ITSC) – Committee comprised of
19 representatives from the CIOA, IIPS, and System Office leadership team who
20 support the ERP Executive Steering Committee.

21 (j) National Institute of Standards and Technologies (NIST) – a federal government
22 agency charged with advancing measurement science, standards, and technology in
23 ways that enhance economic security and improve our quality of life. NIST publishes
24 the Special Publication, Security and Privacy Controls for Information Systems and
25 Organizations (SP800-53), which is the security standard adopted by the North
26 Carolina Department of Information Technology.

27

28 **1B SBCCC 700.3 - Community College System Cybersecurity Framework**

29 (a) Each community college shall use the Statewide Information Security Manual
30 (SISM) published by the North Carolina Department of Information Technology as
31 the principal cybersecurity framework for a system-wide information security and risk

1 management program. System-wide modifications and deviations from this standard
2 shall be reviewed, approved, and maintained by the Information Technology Security
3 Committee (ITSC).

4 (b) The Center for Internet Security (CIS) Controls shall be used by colleges as a
5 resource for implementing a prioritized and structured methodology of assessing
6 local security posture and maturity and for creating plans for continuous
7 improvement.

8 (c) The colleges shall use CIS Security Implementation Groups (IGs) to prioritize
9 implementation of the CIS Critical Security Controls. The IGs are divided into three
10 (3) groups: Implementation Group 1 (IG1), Implementation Group 2 (IG2), and
11 Implementation Group 3 (IG3). Implementation Group 1 (IG1) is the minimum
12 requirement for all colleges and colleges shall incorporate a model of continuous
13 improvement to achieve higher levels of compliance appropriate to the resources
14 and business of the college.

15 16 **1B SBCCC 700.4 - College Information Security Responsibility**

17 (a) Community College Presidents shall designate, authorize, and require at least one
18 person to do all of the following:

19 (1) Assess and understand the college's information security risk.

20 (2) Establish and maintain the college's information security program and ensure
21 compliance with State and federal information security laws.

22 (3) Act as the primary point of contact for the college on issues related to
23 information security.

24 (4) Present professionally sound and timely advice to college leadership regarding
25 appropriate action to support the Information Security Program and the mission
26 of the college.

27 28 **1B SBCCC 700.5 - Enterprise Resource Planning (ERP) Executive Steering** 29 **Committee**

30 (a) The ERP Executive Steering Committee is established to serve as an advisory body
31 on matters related to Enterprise Resource Planning (ERP).

1 (b) The ERP Executive Steering Committee shall be composed of the following
2 members:

3 (1) Five community college presidents, recommended for appointment by the
4 President of the North Carolina Association of Community College Presidents
5 (NCACCP).

6 (2) The North Carolina Community College President and the System Office Chief of
7 Staff, Chief Financial Officer, Chief Academic Officer, Chief Information Officer,
8 and the Vice President of Economic Development.

9 (3) One representative recommended for appointment by Association of Community
10 College Business Officers.

11 (4) One representative recommended for appointment by the Institutional
12 Information Processing System Users Group (IIPS).

13 (5) One representative recommended for appointment by the Chief Information
14 Officer Association.

15 (6) One representative recommended for appointment by the Community College
16 Planning and Research Organization.

17 (c) Members of the ERP Executive Steering Committee shall serve for three-year terms.
18 When there is a vacancy on the ERP Steering Committee the appropriate
19 recommending body shall make a new recommendation for appointment to the
20 Steering Committee.

21 (d) The System Office may provide resources, supplies, and support to the ERP
22 Steering Committee.

23
24 **1B SBCCC 700.6 - Information Technology Requirements Oversight Council**
25 **(IROC)**

26 (a) The Information Technology Requirements Oversight Council (IROC) is established
27 to review, validate, and prioritize strategic demands and enterprise functional and
28 technical projects; change requests significantly modifying the scope of those efforts;
29 and other technology enabled capabilities where system-wide governance serves
30 the best interest of the North Carolina Community College System.

31 (b) The IROC shall do all of the following:

1 (1) Make decisions based on recommendations from the Information Technology
2 Review Board (ITRB).

3 (2) Review, prioritize, and approve the status of NCCCS strategic demands, IT
4 projects, and programs to develop an optimally resourced and balanced IT
5 portfolio. The IROC will consider strategic planning efforts relative to current
6 needs to achieve desired future State outcomes and capabilities.

7 (c) Identify or direct the development of recommendations for community college
8 system-wide capabilities, related strategies, and standards.

9 (d) Provide a structured approach for input from stakeholders into the enterprise
10 demand and IT project process to ensure a capability based decision-making
11 process.

12 (e) The IROC shall be composed of the following six permanent members employed by
13 the NC Community College System Office:

14 (1) NC Community College System Office Chief of Staff. The Chief of Staff serves
15 as Chair to the Council.

16 (2) NC Community College System Office Chief Academic Officer.

17 (3) NC Community College System Office Chief Information Officer.

18 (4) NC Community College System Office Chief Financial Officer.

19 (5) NC Community College Vice-President of Economic Development.

20 (6) NC Community College Vice-President of Strategic Initiatives.

21 (f) The IROC shall also be comprised of the following rotating members.

22 (1) A System Office executive focusing on college institutional research and
23 effectiveness recommended for appointment by the NCCCS Chief of Staff.

24 (2) A System Office executive focusing on curriculum instructional design
25 recommended for appointment by the NCCCS Chief Academic Officer.

26 (3) A System Office executive focusing on continuing education recommended for
27 appointment by the NCCCS Chief Academic Officer.

28 (4) A System Office executive focusing on College and Career Readiness
29 recommended for appointment by the Chief Academic Officer.

30 (5) A System Office executive focused on College and Career Readiness as
31 recommended for appointment by the Chief Academic Officer.

1 (6) A System Office executive focused on College Student Services as
2 recommended for appointment by the Chief Academic Officer.

3 (7) A System Office executive focused on Information Technology as recommended
4 for appointment by the Chief Information Officer.

5 (8) A System Office executive focused on College Business Office or Administrative
6 Services as recommended for appointment by the Chief Financial Officer.

7 (9) A System Office executive focused on Economic Development as recommended
8 for appointment by the Vice-President of Economic Development.

9 (10)The President of the Chief Information Officers Association (COIA)

10 (11)The President of the Institutional Information Processing System Users Group
11 (IIPS).

12 (g) Rotating Members serve a three-year appointment. Initial member appointments
13 were staggered evenly for one, two, and three years to ensure continuity of
14 knowledge and decision-making capabilities.

15 (h) When there is a vacancy on the IROC the appropriate recommending body would
16 make a new recommendation for appointment to the IROC.

17 (i) The System Office may provide resources, supplies, and support to the IROC.

18
19 **1B SBCCC 700.7 Information Technology Security Committee Governance**

20 (a) The Information Technology Security Committee (ITSC) is established to serve as
21 an advisory body to the Executive Steering Committee and the State Board of
22 Community Colleges addressing any of the following.

23 (1) Information technology use and protection, including but not limited to data
24 governance, privacy, compliance, cybersecurity, and IT standards.

25 (2) System-wide and enterprise deviations to established security standards.

26 (3) System-wide and enterprise risk management.

27 (4) System-wide enterprise solutions, configuration management.

28 (5) Areas of improvement for information technology security and related funding
29 needs for the enterprise.

30 (b) The ITSC shall be comprised of all of the following:

1 (1) Two Permanent Members employed by the NC Community College System
2 Office as follows:

3 (i) The Senior Vice President and Chief Information Officer.

4 (ii) The Associate Vice President, Chief Information Security Officer, who serves
5 as the Committee Chair.

6 (2) Eight rotating members to provide information technology leadership
7 representation from the community college campuses. Rotating members are
8 appointed for three years. Initial rotating member appointments were staggered
9 evenly for one, two, and three years to ensure continuity of knowledge and
10 decision-making over time.

11 (3) Recommendations for appointments shall be made by the following community
12 college associations:

13 (i) Three recommendations from the College Chief Information Officers
14 Association (CIOA).

15 (ii) Three recommendations from the College Institutional Information Processing
16 System (IIPS) Users Group.

17 (iii) Two recommendations from the ERP Executive Steering Committee (ESC).
18 These appointments run concurrent to appointed service on the ESC.

19 (4) Associate Members may be appointed by the Committee Chair as needed for a
20 specified duration to meet specific strategic needs or purposes.

21
22 **1B SBCCC 700.8 - Data Governance Committee**

23 (a) The Data Governance Committee serves as an advisory and decision-making body
24 that is charged with building and maintaining effective data systems to ensure data
25 quality, efficient processes, and effective reporting capabilities within the North
26 Carolina Community College System. The Data Governance Committee approves
27 data definitions, recommendations on data entry processes and implementation
28 guidelines to ensure consistent data collection and timely data reporting.

29 (b) The Data Governance Committee shall be composed of the following members,
30 each of whom shall serve for a three-year term:

- 1 (1) One college president, who will serve as Chair, appointed by the President of the
2 North Carolina Association of Community College Presidents (NCACCP).
- 3 (2) One instructional administrator appointed by the President of the North Carolina
4 Association of Community College Instructional Administrators (NCACCIA).
- 5 (3) One continuing education administrator and one basic skills director appointed by
6 the President of the North Carolina Community College Adult Educators
7 Association (NCAEA).
- 8 (4) One student development administrator appointed by the President of the
9 Student Development Administrators Association (NCSDAA).
- 10 (5) One chief financial officer appointed by the North Carolina Association of
11 Community College Business Officers (ACCBO).
- 12 (6) Three institutional research/institutional effectiveness officers appointed by the
13 Community College Planning and Research Organization (CCPRO).
- 14 (7) One chief information officer appointed by the Chief Information Officer
15 Association (CIOA).
- 16 (8) One representative appointed by the Institutional Information Processing System
17 Users Group (IIPS).
- 18 (9) The designee of the North Carolina Community College System President,
19 representing the executive division.
- 20 (10) A designee from each of the System Office's other divisions appointed by the
21 division vice president.

22 Current members serving on the Data Governance Committee as of the effective date
23 of this rule shall serve the remainder of their terms. Thereafter, as terms expire, or when
24 a vacancy occurs prior to the expiration of a term, members of the Data Governance
25 Committee shall be appointed in accordance with this rule.

26 (c) No member of the Data Governance Committee shall serve more than two
27 consecutive terms of three years on this Committee. This limitation does not prohibit
28 an individual from serving future terms after a period of non-service of at least one
29 year. This sub-section shall not apply to System Office designees.

30 (d) The Data Governance Committee shall notify colleges of the committee's proposed
31 recommendations that address data definitions and quality issues through numbered

1 memos, as necessary. Colleges may provide written comments for a period of no
2 less than 10 business days from the date of notification of a proposed
3 recommendation.

4 5 **1B SBCCC 700.9 Provision of Information to the System Office**

6 (a) Purpose. To ensure the quality of educational programs, to promote the systematic
7 meeting of educational needs of the State, and to provide for the equitable
8 distribution of State and federal funds to the several institutions, the State Board
9 must have timely access to accurate data that is comparable across institutions. The
10 purpose of this policy is to establish rules governing the consistent collection and
11 reporting of data to fulfill reporting requirements, assess compliance, and to evaluate
12 education programs.

13 (b) Annual Reporting Plan. No later than May 1st of each year, the System Office shall
14 publish the Annual Reporting Plan for the upcoming fiscal year. This plan shall
15 include a list of information requirements, associated deadlines, and a description of
16 how the System Office will use the information. If a requirement involves
17 transmission of raw data, the plan shall also include an appendix listing the data
18 elements collected. The System Office may amend the plan, as needed, provided
19 colleges are provided notice of at least 20 business days for any newly added
20 requirement.

21 (c) Reports. The trustees and the president of each college are responsible for ensuring
22 information outlined in the Annual Reporting Plan and any ad hoc information
23 requirements requested by the System Office are provided in a timely manner and in
24 the format prescribed by the System President. Required data elements shall
25 conform with the NCCCS Data Dictionary, where applicable.

26 (d) Reporting Accountability. The System Office shall provide annually to each college
27 president a summary of the college's compliance with this rule for information
28 requirements on the Annual Reporting Plan. The summary shall include whether
29 information was complete, conformed to the definitions in the NCCCS Data
30 Dictionary (if applicable), and provided by the deadline. The System Office shall
31 provide implementation assistance to colleges struggling with compliance. Refusal to

1 provide information in accordance with the Annual Reporting Plan or failure to
2 remedy a multi- year pattern of submitting late, incomplete, or non-conforming
3 information shall constitute non-compliance under 1H SBCCC 200.2(a)(4).

4
5 **1B SBCCC 700.10 Information Security References**

6 The System Office shall maintain and publish on its website a list of references to
7 cybersecurity and compliance resources for the community college system.

8
9 *History Note: Authority G.S. 115D-5*

10 *Eff.*