



NORTH CAROLINA COMMUNITY COLLEGE SYSTEM

Thomas A. Stith, III

President

NUMBERED MEMO CC22-033

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: Adoption of 1B SBCCC Subchapter 700 – Information Security Program
Repeal of 1B SBCCC 400.4 – Provision of Information to the System Office

DATE: May 24, 2022

On May 20, 2022, the State Board of Community Colleges (“SBCC”) voted to adopt a new subchapter into the State Board Code, **1B SBCCC Subchapter 700 – Information Security Program**. The State Board also voted to repeal **1B SBCCC 400.4 – Provision of Information to the System Office**. The adopted subchapter, 1B SBCCC Subchapter 700, will codify existing information security program governance, as well as codify the structure of current information technology committees and councils that assist in executing current policies and assessing future technology strategies for the system. The repealed provisions in 1B SBCCC 400.4 concerning data governance and information technology reporting will be recodified as part of the new proposed subchapter.

The adoption and repeal will be effective June 1, 2022. The new subchapter will be published on the North Carolina Community College System’s website, www.nccommunitycolleges.edu/sbcccode. For your convenience, copies of the adopted and repealed rules are attached to this memorandum.

CC22-033

E-mail Copy Attachments

Chapter 1, Title B is amended as follows:



State Board of Community Colleges Code

TITLE 1 – COMMUNITY COLLEGES

CHAPTER B. COLLEGE OPERATIONS

SUBCHAPTER 700. INFORMATION SECURITY PROGRAM

1B SBCCC 700.1 - Introduction

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

1B SBCCC 700.2 - Definitions

The following definitions apply to this Chapter.

- (a) Chief Information Officer (CIO) - Chief information officer (CIO), may also be known as the information technology (IT) director, and is the IT leader at a college who oversees the work related to information technology and computer systems to support college goals.
- (b) Chief Information Officers Association (CIOA) – Refers to a group of North Carolina community college chief information officers and/or IT leaders who meet regularly to collaborate on IT issues on their campuses.
- (c) Chief Information Security Officer (CISO) - A chief information security officer (CISO) is the leader responsible for ensuring information assets and technologies are adequately protected.
- (d) Center for Internet Security (CIS) - CIS is an independent, global nonprofit organization focused on IT security. The community college system utilizes CIS resources as tools to prioritize and track cybersecurity maturity and improvement.
- (e) Enterprise Resource Planning (ERP) Executive Steering Committee – An advisory

committee created to address the legislative mandate to plan and design a modernized ERP for the community colleges. The ERP system must, at a minimum, include student information system, core financial management, grants, human resource management, and payroll.

- (f) Institutional Information Processing System Users Group (IIPS) – is a group of community college employees, trustees, and friends of the North Carolina Community College System (NCCCS) and/or persons officially associated with the community colleges to promote communications, collaboration, and professional development or educational opportunities among academic and administrative computer users within the North Carolina Community College System.
- (g) Information Requirements Oversight Council (IROC) -- A working group focused on supporting processes to review, validate, and prioritize enterprise impacting IT projects, Requests for Change (RFCs) and other IT enabled capabilities within the North Carolina Community College System.
- (h) Information Security Office (ISO) – The System Office team supporting cybersecurity efforts for the college system.
- (i) Information Technology Security Committee (ITSC) – Committee comprised of representatives from the CIOA, IIPS, and System Office leadership team who support the ERP Executive Steering Committee.
- (j) National Institute of Standards and Technologies (NIST) – a federal government agency charged with advancing measurement science, standards, and technology in ways that enhance economic security and improve our quality of life. NIST publishes the Special Publication, Security and Privacy Controls for Information Systems and Organizations (SP800-53), which is the security standard adopted by the North Carolina Department of Information Technology.

1B SBCCC 700.3 - Community College System Cybersecurity Framework

- (a) Each community college shall use the Statewide Information Security Manual (SISM) published by the North Carolina Department of Information Technology as the principal cybersecurity framework for a system-wide information security and risk management program. System-wide modifications and deviations from this standard

shall be reviewed, approved, and maintained by the Information Technology Security Committee (ITSC).

- (b) The Center for Internet Security (CIS) Controls shall be used by colleges as a resource for implementing a prioritized and structured methodology of assessing local security posture and maturity and for creating plans for continuous improvement.
- (c) The colleges shall use CIS Security Implementation Groups (IGs) to prioritize implementation of the CIS Critical Security Controls. The IGs are divided into three (3) groups: Implementation Group 1 (IG1), Implementation Group 2 (IG2), and Implementation Group 3 (IG3). Implementation Group 1 (IG1) is the minimum requirement for all colleges and colleges shall incorporate a model of continuous improvement to achieve higher levels of compliance appropriate to the resources and business of the college.

1B SBCCC 700.4 - College Information Security Responsibility

- (a) Community College Presidents shall designate, authorize, and require at least one person to do all of the following:
 - (1) Assess and understand the college's information security risk.
 - (2) Establish and maintain the college's information security program and ensure compliance with State and federal information security laws.
 - (3) Act as the primary point of contact for the college on issues related to information security.
 - (4) Present professionally sound and timely advice to college leadership regarding appropriate action to support the Information Security Program and the mission of the college.

1B SBCCC 700.5 - Enterprise Resource Planning (ERP) Executive Steering Committee

- (a) The ERP Executive Steering Committee is established to serve as an advisory body on matters related to Enterprise Resource Planning (ERP).
- (b) The ERP Executive Steering Committee shall be composed of the following members:
 - (1) Five community college presidents, recommended for appointment by the

President of the North Carolina Association of Community College Presidents (NCACCP).

- (2) The North Carolina Community College President and the System Office Chief of Staff, Chief Financial Officer, Chief Academic Officer, Chief Information Officer, and the Vice President of Economic Development.
 - (3) One representative recommended for appointment by Association of Community College Business Officers.
 - (4) One representative recommended for appointment by the Institutional Information Processing System Users Group (IIPS).
 - (5) One representative recommended for appointment by the Chief Information Officer Association.
 - (6) One representative recommended for appointment by the Community College Planning and Research Organization.
- (c) Members of the ERP Executive Steering Committee shall serve for three-year terms. When there is a vacancy on the ERP Steering Committee the appropriate recommending body shall make a new recommendation for appointment to the Steering Committee.
- (d) The System Office may provide resources, supplies, and support to the ERP Steering Committee.

1B SBCCC 700.6 - Information Technology Requirements Oversight Council (IROC)

- (a) The Information Technology Requirements Oversight Council (IROC) is established to review, validate, and prioritize strategic demands and enterprise functional and technical projects; change requests significantly modifying the scope of those efforts; and other technology enabled capabilities where system-wide governance serves the best interest of the North Carolina Community College System.
- (b) The IROC shall do all of the following:
 - (1) Make decisions based on recommendations from the Information Technology

Review Board (ITRB).

- (2) Review, prioritize, and approve the status of NCCCS strategic demands, IT projects, and programs to develop an optimally resourced and balanced IT portfolio. The IROC will consider strategic planning efforts relative to current needs to achieve desired future State outcomes and capabilities.
- (c) Identify or direct the development of recommendations for community college system-wide capabilities, related strategies, and standards.
- (d) Provide a structured approach for input from stakeholders into the enterprise demand and IT project process to ensure a capability based decision-making process.
- (e) The IROC shall be composed of the following six permanent members employed by the NC Community College System Office:
- (1) NC Community College System Office Chief of Staff. The Chief of Staff serves as Chair to the Council.
 - (2) NC Community College System Office Chief Academic Officer.
 - (3) NC Community College System Office Chief Information Officer.
 - (4) NC Community College System Office Chief Financial Officer.
 - (5) NC Community College Vice-President of Economic Development.
 - (6) NC Community College Vice-President of Strategic Initiatives.
- (f) The IROC shall also be comprised of the following rotating members.
- (1) A System Office executive focusing on college institutional research and effectiveness recommended for appointment by the NCCCS Chief of Staff.
 - (2) A System Office executive focusing on curriculum instructional design recommended for appointment by the NCCCS Chief Academic Officer.
 - (3) A System Office executive focusing on continuing education recommended for appointment by the NCCCS Chief Academic Officer.
 - (4) A System Office executive focusing on College and Career Readiness recommended for appointment by the Chief Academic Officer.

- (5) A System Office executive focused on College and Career Readiness as recommended for appointment by the Chief Academic Officer.
 - (6) A System Office executive focused on College Student Services as recommended for appointment by the Chief Academic Officer.
 - (7) A System Office executive focused on Information Technology as recommended for appointment by the Chief Information Officer.
 - (8) A System Office executive focused on College Business Office or Administrative Services as recommended for appointment by the Chief Financial Officer.
 - (9) A System Office executive focused on Economic Development as recommended for appointment by the Vice-President of Economic Development.
 - (10) The President of the Chief Information Officers Association (COIA)
 - (11) The President of the Institutional Information Processing System Users Group (IIPS).
- (g) Rotating Members serve a three-year appointment. Initial member appointments were staggered evenly for one, two, and three years to ensure continuity of knowledge and decision-making capabilities.
 - (h) When there is a vacancy on the IROC the appropriate recommending body would make a new recommendation for appointment to the IROC.
 - (i) The System Office may provide resources, supplies, and support to the IROC.

1B SBCCC 700.7 Information Technology Security Committee Governance

- (a) The Information Technology Security Committee (ITSC) is established to serve as an advisory body to the Executive Steering Committee and the State Board of Community Colleges addressing any of the following.
 - (1) Information technology use and protection, including but not limited to data governance, privacy, compliance, cybersecurity, and IT standards.
 - (2) System-wide and enterprise deviations to established security standards.

- (3) System-wide and enterprise risk management.
 - (4) System-wide enterprise solutions, configuration management.
 - (5) Areas of improvement for information technology security and related funding needs for the enterprise.
- (b) The ITSC shall be comprised of all of the following:
- (1) Two Permanent Members employed by the NC Community College System Office as follows:
 - (i) The Senior Vice President and Chief Information Officer.
 - (ii) The Associate Vice President, Chief Information Security Officer, who serves as the Committee Chair.
 - (2) Eight rotating members to provide information technology leadership representation from the community college campuses. Rotating members are appointed for three years. Initial rotating member appointments were staggered evenly for one, two, and three years to ensure continuity of knowledge and decision-making over time.
 - (3) Recommendations for appointments shall be made by the following community college associations:
 - (i) Three recommendations from the College Chief Information Officers Association (CIOA).
 - (ii) Three recommendations from the College Institutional Information Processing System (IIPS) Users Group.
 - (iii) Two recommendations from the ERP Executive Steering Committee (ESC).
These appointments run concurrent to appointed service on the ESC.
 - (4) Associate Members may be appointed by the Committee Chair as needed for a specified duration to meet specific strategic needs or purposes.

1B SBCCC 700.8 - Data Governance Committee

- (a) The Data Governance Committee serves as an advisory and decision-making body that is charged with building and maintaining effective data systems to ensure data quality, efficient processes, and effective reporting capabilities within the North Carolina Community College System. The Data Governance Committee approves

data definitions, recommendations on data entry processes and implementation guidelines to ensure consistent data collection and timely data reporting.

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

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

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

(c) No member of the Data Governance Committee shall serve more than two consecutive terms of three years on this Committee. This limitation does not prohibit

an individual from serving future terms after a period of non-service of at least one year. This sub-section shall not apply to System Office designees.

- (d) The Data Governance Committee shall notify colleges of the committee's proposed recommendations that address data definitions and quality issues through numbered memos, as necessary. Colleges may provide written comments for a period of no less than 10 business days from the date of notification of a proposed recommendation.

1B SBCCC 700.9 Provision of Information to the System Office

- (a) Purpose. To ensure the quality of educational programs, to promote the systematic meeting of educational needs of the State, and to provide for the equitable distribution of State and federal funds to the several institutions, the State Board must have timely access to accurate data that is comparable across institutions. The purpose of this policy is to establish rules governing the consistent collection and reporting of data to fulfill reporting requirements, assess compliance, and to evaluate education programs.
- (b) Annual Reporting Plan. No later than May 1st of each year, the System Office shall publish the Annual Reporting Plan for the upcoming fiscal year. This plan shall include a list of information requirements, associated deadlines, and a description of how the System Office will use the information. If a requirement involves transmission of raw data, the plan shall also include an appendix listing the data elements collected. The System Office may amend the plan, as needed, provided colleges are provided notice of at least 20 business days for any newly added requirement.
- (c) Reports. The trustees and the president of each college are responsible for ensuring information outlined in the Annual Reporting Plan and any ad hoc information requirements requested by the System Office are provided in a timely manner and in the format prescribed by the System President. Required data elements shall conform with the NCCCS Data Dictionary, where applicable.
- (d) Reporting Accountability. The System Office shall provide annually to each college president a summary of the college's compliance with this rule for information requirements on the Annual Reporting Plan. The summary shall include whether

information was complete, conformed to the definitions in the NCCCS Data Dictionary (if applicable), and provided by the deadline. The System Office shall provide implementation assistance to colleges struggling with compliance. Refusal to provide information in accordance with the Annual Reporting Plan or failure to remedy a multi- year pattern of submitting late, incomplete, or non-conforming information shall constitute non-compliance under 1H SBCCC 200.2(a)(4).

1B SBCCC 700.10 Information Security References

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

History Note: Authority G.S. 115D-5

Eff. [June 1, 2022](#)

Title 1, Chapter B is amended as follows:



State Board of Community Colleges Code

Title 1 – COMMUNITY COLLEGES

CHAPTER B. COLLEGE OPERATIONS

~~1B-SBCCC 400.4~~ PROVISION OF INFORMATION TO THE SYSTEM OFFICE

- ~~(a) Purpose. To ensure the quality of educational programs, to promote the systematic meeting of educational needs of the State, and to provide for the equitable distribution of State and federal funds to the several institutions, the State Board must have timely access to accurate data that is comparable across institutions. The purpose of this policy is to establish rules governing the consistent collection and reporting of data to fulfill reporting requirements, assess compliance, and to evaluate education programs.~~
- ~~(b) Annual Reporting Plan. No later than May 1st of each year, the System Office shall publish the Annual Reporting Plan for the upcoming fiscal year. This plan shall include a list of information requirements, associated deadlines, and a description of how the System Office will use the information. If a requirement involves transmission of raw data, the plan shall also include an appendix listing the data elements collected. The System Office may amend the plan, as needed, provided colleges are provided notice of at least 20 business days for any newly added requirement.~~
- ~~(c) Data Governance Committee.~~
- ~~(1) The Data Governance Committee shall approve definitions for data elements used throughout the North Carolina Community College System (NCCCS) and identify issues the System Office should consider when determining an effective date for implementation. Once the System Office determines an implementation effective date, the definition and effective date shall be published in the NCCCS Data Dictionary published on the NCCCS website. The Data Governance Committee may also provide recommendations on data entry processes and other best practices that promote data quality. The System Office shall provide guidance to colleges on definition implementation.~~
- ~~(2) The Data Governance Committee shall be composed of the following members, each of whom shall serve for a three-year term:~~
- ~~(A) One College President, who will serve as Chair, appointed by the President of the North Carolina Association of Community College Presidents (NCACCP).~~

- ~~(B) One Instructional Administrator appointed by the President of the North Carolina Association of Community College Instructional Administrators (NCACCIA).~~
- ~~(C) One Continuing Education Administrator and one Basic Skills Director appointed by the President of the North Carolina Community College Adult Educators Association (NCAEA).~~
- ~~(D) One Student Development Administrator appointed by the President of the Student Development Administrators Association (NCSDAA).~~
- ~~(E) One Chief Financial Officer appointed by the North Carolina Association of Community College Business Officers (ACCBBO).~~
- ~~(F) Three Institutional Research/Institutional Effectiveness Officers appointed by the Community College Planning and Research Organization (CCPRO).~~
- ~~(G) One Chief Information Officer appointed by the Chief Information Officer Association (CIOA).~~
- ~~(H) One representative appointed by the Institutional Information Processing System Users Group (IIPS).~~
- ~~(I) The designee of the North Carolina Community College System President.~~
- ~~(J) A designee from each System Office division appointed by the division Vice President.~~

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

- ~~(3) Excluding System Office designees, no member of the Data Governance Committee, shall serve more than two consecutive terms of three years on the Committee. This limitation does not prohibit an individual from serving future terms after a period of non-service of at least one year.~~
 - ~~(4) The Data Governance Committee shall notify colleges of proposed data element definitions and shall provide for a period of no less than 10 business days from the date of notification during which colleges may provide comments on the proposed data element definitions.~~
- ~~(d) Reports. The trustees and the president of each college are responsible for ensuring information outlined in the Annual Reporting Plan and any ad hoc information requirements requested by the System Office are provided in a timely manner and in the format prescribed~~

~~by the System President. Required data elements shall conform with the NCCCS Data Dictionary, where applicable.~~

~~(e) Reporting Accountability. The System Office shall provide annually to each college president a summary of the college's compliance with this rule for information requirements on the Annual Reporting Plan. The summary shall include whether information was complete, conformed to the definitions in the NCCCS Data Dictionary (if applicable), and provided by the deadline. The System Office shall provide implementation assistance to colleges struggling with compliance. Refusal to provide information in accordance with the Annual Reporting Plan or failure to remedy a multi-year pattern of submitting late, incomplete, or non-conforming information shall constitute non-compliance under 1H SBCCC 200.2(a)(4).~~

History Note: Authority G.S. 115D-5.

Eff. [October 1, 2018](#)

Repealed Eff: [June 1, 2022](#)