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May 29, 2020

Dr. Christy Ponce, President  
Temple College  
2600 S. 1st Street  
Temple, Texas 76504

Dear Dr. Ponce,

I am attaching the final report on *A Compliance Monitoring Desk Review of Formula Funding at Temple College*, Report No. THECB-CM-FF-20-014. There was one finding related to information technology controls resulting from this engagement.

## Summary

Information security controls over student enrollment information at Temple College require improvement. Audit trails over key enrollment data such as class meeting days and times must be established to ensure the reliability and integrity of data used for formula funding decision making purposes. Therefore, our original review objectives, including a determination of the accuracy of contact hours reported by Temple College, were unable to be met.

A follow up audit will be performed to evaluate Temple College's information security controls. This will serve as a basis for future base period assessments of the accuracy of contact hours reported for formula funding purposes.

This Compliance Monitoring report will be presented to the Texas Higher Education Coordinating Board (THECB) Committee on Agency Operations, a standing committee of the THECB Board, on July 22, 2020.

The cooperation of your staff during this review is greatly appreciated. If you have any questions or comments, please let me know.

Sincerely,

A handwritten signature in black ink that reads "Mark A. Poehl".

Mark A. Poehl, CPA, CIA, CISA, CFE  
Assistant Commissioner, Internal Audit and Compliance

## **Detailed Observation, Recommendation and Management's Response**

### **1. Information technology processes and controls over student information system enrollment data should be strengthened.**

Information technology processes and controls over student information system enrollment data should be strengthened. Although Temple College has policies and procedures in place to limit access to information systems, the student information system does not provide audit logs or change history for critical formula funding data, including:

- Credit hours
- Lab hours
- Lab contact hours
- Instruction mode
- Meeting times
- Lecture hours
- Lecture contact hours
- Type of instruction
- Meeting days
- Instructor of record

Audit logs provide documentary evidence to track a sequence of events, and the ability to monitor unauthorized system use or unusual activity. Without audit logs, maintaining the integrity of system information, and ensuring the reliability of data is limited.

Family Educational Rights and Privacy Act (FERPA) 34 CFR 99.31(a)(1)(ii) requires that "An educational agency or institution must use reasonable methods to ensure that school officials obtain access to only those education records in which they have legitimate educational interests." Security standards (TAC 202) established by the Department of Information Resources (DIR) for institutions of higher education are becoming a phased – in requirement for Community Colleges and provide a comprehensive basis for strengthening information security.

#### **Recommendation:**

Capture and retain student information system audit logs or change history for the critical data used for formula funding.

#### **Management Response:**

Temple College immediately resolved the logging issue and has taken proactive steps so that this issue never occurs in the future. On May 1, 2020, Temple College adjusted the Ellucian Colleague system to capture and retain student information system audit logs or change history for critical formula funding enrollment data. Temple College now has the capability to provide audit logs.

**Responsible Parties:** Shawn Dach, Division Director of Information Technology;  
Brandon Bozon, Vice President of Administrative Services and Chief Financial  
Officer; Carey Rose, Division Director of Student Enrollment Services

**Completion and Effective Date:** May 1, 2020

**PERFORMED BY:**

Ms. Carol Conner, CFE, Compliance Specialist

CC:

**THECB**

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