



AGENDA

THEC/TSAC JOINT AUDIT COMMITTEE

Room 8B, 8th Floor, Cordell Hull Bldg.

July 28, 2022, Immediately following THEC Commission Meeting

Adoption of Agenda

Approval of Minutes from November 18, 2021 Meeting

Regular Calendar

- I. Internal Audit Charter (*Action Item*)
- II. TSAC Compliance Program - New Review Process (*Information Item*)
- III. Cyber Incident Response Plan Results Review (*Information Item*)
- IV. Internal Audit Updates (*Information Item*)

THEC/TSAC JOINT AUDIT COMMITTEE MEETING

Minutes of the Fall Meeting
Conference Room 8C/8D, 8th Floor
Cordell Hull Bldg.
November 18, 2021

Chairwoman Pam Koban called the meeting to order at 12:34 p.m.

Member	PRESENT	ABSENT
Chairwoman Pam Koban	X	
Dr. Nancy Dishner	X	
Dr. Claude Pressnell	X	
Mr. Vernon Stafford	X	
Ms. Doree Hicks	X	

At the start of the meeting, all five (5) current members of the Joint Audit Committee were present, constituting a quorum. Dr. Claude Pressnell left the meeting at 1:30 p.m., still leaving a duly formed quorum.

ADOPTION OF AGENDA

Mr. Vernon Stafford made a motion to adopt the agenda. Dr. Claude Pressnell seconded the motion. A voice vote was taken, the motion passed unanimously.

APPROVAL OF JULY 22, 2021 MINUTES

Dr. Nancy Dishner made a motion to approve the minutes from the previous meeting held on July 22, 2021. Mr. Vernon Stafford seconded the motion. A voice vote was taken, the motion passed unanimously.

I. Information Update – THEC/TSAC Bureau Chief Program Briefings

Chairwoman Koban introduced Doug Cullum to introduce each of the bureau chiefs to give an overview of their bureaus.

Scott Sloan, General Counsel, presented information on the Legal Bureau of THEC/TSAC. The Legal Bureau consists of eight (8) members. The Bureau consists of legal, Shauna Jennings, Deputy General Counsel, and Amber Walsh, Human Resources, David Heithcock and Michelle Pieplow, and two of the Governor's grant initiatives, the Governor's Initiative in Vocational Education (GIVE) and Supporting Postsecondary Access in Rural Counties (SPARC), which are run by Mitch Currey and Dr. Brandon Hudson. Mr. Sloan discussed the legal division's responsibility for contracts and grant

contracts for both THEC and TSAC, the Title VI report, the Subrecipient Monitoring Report, and their close work with the Central Procurement Office and the Fiscal Review Committee. On the THEC side, Shauna Jennings serves as the board secretary for the Commission and the Bureau provides legal advice on legal matters for the Executive Director and the Commission, as well as, responding to public records requests.

Committee members asked questions and a discussion followed.

Jason Cavender, Chief Financial Officer, presented information on the Finance and Administration Bureau of THEC/TSAC. The Finance and Administration Bureau is responsible for budgeting, purchasing, payroll, and other accounts payable and receivable. The Finance and Administration Bureau also oversees the capital outlay and capital maintenance projects. In addition, the Finance and Administration Bureau has overseen the campus safety and security initiative. Finally, the information technology and information administration staff are a part of the Finance and Administration Bureau, which includes the technical support, facilities inventory, and data management.

Committee members asked questions and a discussion followed.

Dr. Betty Dandridge-Johnson, Chief Academic Officer, presented information about the Academic Affairs Bureau. The team of twelve (12) employees work in academic affairs, student success, and institutional success. Academic programs are guided by federal, state, and THEC policy guidelines. The THEC policies are approved by the Commission. Staff follow academic programs from inception to termination. Academic Affairs Bureau also focus on programs geared towards the success of Historically Black Universities and student veterans.

Committee members asked questions and a discussion followed.

Dr. Steven Gentile, Chief Policy Officer, presented information on the Policy, Planning, and Research Bureau. There are three (3) main areas in which this Bureau focuses: Fiscal Policy, Planning and Analysis, and Student Information. The fiscal policy staff oversee state appropriations, institutional outcome improvement, outcomes-based funding formula, tuition and fees, and the strategic financial plan. The planning and analysis staff create the Master Plan, Fact Book, and many other reports such as the Articulation and Transfer Report and the Supply and Demand Report. Lastly, the Policy, Planning, and Research Bureau developed a Student Information System (SIS) that is used to collect student data from the state's public universities and colleges. This assists the staff in maintaining and analyzing data in respect to lottery scholarships and reporting regularly to the legislature regarding this information.

Committee members asked questions and a discussion followed.

The Access and Outreach Bureau information was presented by Ms. Jessica Gipson, Mr. Troy Grant, and Mr. Jason Seay. This Bureau is responsible for Adult Learner initiatives, College Access and Success, and student financial aid outreach services. The Adult Learner Initiatives staff is a team of 24 with 12 Navigators, and three (3) Re-entry Navigators for the TN Reconnect program. The Re-entry Navigators are a part of the Correction Education Initiative and work with incarcerated individuals to assist them in postsecondary education achievement for success outside the prison environment. THEC also partners with the Department of Labor and Workforce Development and Department of Health for the development of "One-TN-Connection," which is an available resource for Tennesseans who may be needing additional resources, such as Temporary Assistance for Needy Families (TANF) or Supplemental Nutrition Assistance Program (SNAP), by determining eligibility and how to access these resources.

The College Access and Success program staff provide direct and statewide services. The direct services portion include projects such as GEAR UP, which strives to increase the postsecondary expectations and readiness of K-12 students, improving high school graduation and postsecondary enrollment rates, and raising the knowledge of postsecondary options, preparations, and financing among students and families, and AdviseTN, which aims to increase the number of Tennesseans accessing higher education by partnering with high schools and providing college advising services to up to 11,000 junior and senior students across Tennessee. Statewide services include resources available on colleges, financial aid, and other resources that will help parents, students, and local education authorities (LEAs) understand what is available for them in terms of achieving postsecondary credentials.

Lastly, there are eight (8) individuals who work on educating the public on how to apply and qualify for financial aid. This group not only educates but assists individuals on how to correctly complete the Free Application for Federal Student Aid (FAFSA).

Committee members asked questions and a discussion was had.

Peter Abernathy, Chief Aid and Compliance Officer, presented information on the Student Aid and Compliance Bureau. This Bureau oversees the lottery-funded and state-funded programs. There are twenty-one (21) programs in total that are overseen by this Bureau. This Bureau also oversees the Division of Postsecondary State Authorization which focuses on the authorization and closures of proprietary institutions, exempt authorized institutions, academic transcripts for closed institutions, and distance education authorization requests.

Committee members asked questions and a discussion was had.

II. Audit Charter Component Discussion – Financial Integrity Act and Fraud/Risk Assessment

Mr. Cavender presented information on the financial integrity act and fraud/risk assessment. It was noted that THEC and TSAC complete a fraud/risk assessment annually and are checked on to see if any changes need to be implemented semi-annually.

Chairwoman Koban adjourned the meeting at 1:47 p.m.

Chairwoman Pam Koban

Dr. Claude Pressnell

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Tennessee Student Assistance Corporation
Internal Audit Charter

Purpose and Mission

The purpose of THEC/TSAC's internal audit activity is to provide independent, objective assurance and consulting services designed to add value and improve operations. The mission of internal audit is to enhance and protect organizational value by providing risk-based and objective assurance, advice, and insight. The internal audit activity helps THEC/TSAC accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, risk management, and control processes.

Standards for the Professional Practice of Internal Auditing

The internal audit activity will govern itself by adherence to the mandatory elements of the Institute of Internal Auditors' (IIA) International Professional Practices Framework, including the Core Principles for the Professional Practice of Internal Auditing, the Code of Ethics, the International Standards for the Professional Practice of Internal Auditing, and the Definition of Internal Auditing. The Director of Internal Audit will report periodically to the THEC/TSAC Executive Director, Internal Audit Committee and the State of Tennessee's Executive Internal Auditor (EIA) regarding the internal audit department's conformance to the Code of Ethics and the *Standards*.

Additionally, the internal audit department will also incorporate aspects of the Government Accountability Office's *Generally Accepted Government Audit Standards* (GAGAS) and the Association of Certified Fraud Examiners (ACFE) Code of Professional Ethics and Code of Professional Standards.

Authority

The IAD will report functionally to the audit committee and administratively (i.e., day-to-day operations) to the THEC/TSAC Executive Director. To establish, maintain, and assure that THEC/TSAC's internal audit activity has sufficient authority to fulfill its duties, the audit

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committee will:

- Review and provide comments on the internal audit activity's charter.
- Approve the risk-based internal audit plan.
- Receive communications from the IAD on the internal audit activity's performance relative to its plan and other matters.
- Make appropriate inquiries of management and the IAD to determine whether there is inappropriate scope or resource limitations.

As part of the State's Executive Internal Auditor (EIA) initiative, the IAD will:

- Submit the internal audit charter to the EIA.
- Annually submit an audit plan approved by the THEC/TSAC Audit Committee to the EIA.
- Quarterly provide updates to the EIA.
- Participate in the EIA roundtable meetings and other activities as needed.

The THEC/TSAC Executive Director and the EIA will approve decisions regarding the appointment and removal of the IAD.

Performance goals developed by the EIA will be incorporated into the evaluation of the IAD.

The IAD will have unrestricted access to, and communicate and interact directly with, the audit committee and/or the EIA, including in private meetings without management present.

The audit committee and the EIA authorize the internal audit department to:

- Have full, free, and unrestricted access to all functions, records, property, and personnel pertinent to carrying out any engagement, subject to accountability for confidentiality and safeguarding of records and information.
- Allocate resources, set frequencies, select subjects, determine scopes of work, apply techniques required to accomplish audit objectives, and issue reports.
- Obtain assistance from the necessary personnel of THEC/TSAC, as well as other specialized services from within or outside THEC/TSAC, in order to complete the engagement.

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Independence and Objectivity

The IAD will ensure that the internal audit activity remains free from all conditions that threaten the ability of the IAD to carry out his or her responsibilities in an unbiased manner, including matters of audit selection, scope, procedures, frequency, timing, and report content. If the IAD determines that independence or objectivity may be impaired in fact or appearance, the details of impairment will be disclosed to appropriate parties.

The IAD will maintain an unbiased mental attitude that allows him or her to perform engagements objectively and in such a manner that the IAD believes in the work product, that no quality compromises are made, and that the IAD does not subordinate their judgment on audit matters to others.

The IAD will have no direct operational responsibility or authority over any of the activities audited. Accordingly, the IAD will not implement internal controls, develop procedures, install systems, prepare records, or engage in any other activity that may impair his or her judgment, including:

- Assessing specific operations for which the IAD had responsibility within the previous year.
- Performing any operational duties for THEC/TSAC or its affiliates.
- Initiating or approving transactions external to the internal audit activity.
- Directing the activities of any THEC/TSAC employee not employed by the internal audit activity, except to the extent that such employees have been appropriately assigned to otherwise assist the IAD.

Where the IAD has or is expected to have roles and/or responsibilities that fall outside of internal auditing, safeguards will be established to limit impairments to independence or objectivity. The IAD will:

- Disclose any impairment of independence or objectivity, in fact or appearance, to appropriate parties.
- Exhibit professional objectivity in gathering, evaluating, and communicating information about the activity or process being examined.
- Make balanced assessments of all available and relevant facts and circumstances.
- Take necessary precautions to avoid being unduly influenced by their own interests or by others in forming judgments.

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The IAD will confirm to the audit committee, at least annually, the organizational independence of the internal audit activity.

The IAD will disclose to the audit committee and EIA any interference and related implications in determining the scope of internal auditing, performing work, and/or communicating results.

Scope of Internal Audit Activities

The scope of internal audit activities encompasses, but is not limited to, objective examinations of evidence for the purpose of providing independent assessments to the audit committee, management, and outside parties on the adequacy and effectiveness of governance, risk management, and control processes for THEC/TSAC. Internal audit assessments include evaluating whether:

- Risks relating to the achievement of THEC/TSAC's strategic objectives are appropriately identified and managed.
- The actions of THEC/TSAC's officers, directors, employees, and contractors are in compliance with THEC/TSAC's policies, procedures, and applicable laws, regulations, and governance standards.
- The results of operations or programs are consistent with established goals and objectives.
- Operations or programs are being carried out effectively and efficiently.
- Established processes and systems enable compliance with the policies, procedures, laws, and regulations that could significantly impact THEC/TSAC.
- Information and the means used to identify, measure, analyze, classify, and report such information are reliable and have integrity.
- Resources and assets are acquired economically, used efficiently, and protected adequately.

The IAD will report periodically to senior management and the audit committee regarding:

- The internal audit department's purpose, authority, and responsibility.
- The internal audit department's plan and performance relative to its plan.
- The internal audit department's conformance with The IIA's Code of Ethics and *Standards*,

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and action plans to address any significant conformance issues.

- Significant risk exposures and control issues, including fraud risks, governance issues, and other matters requiring the attention of, or requested by, the EIA.
- Results of audit engagements or other activities.
- Resource requirements.
- Any response to risk by management that may be unacceptable to THEC/TSAC.

The IAD also coordinates activities, where possible, and considers relying upon the work of other internal and external assurance and consulting service providers as needed. The internal audit activity may perform advisory and related client service activities, the nature and scope of which will be agreed with the client, provided the internal audit activity does not assume management responsibility.

Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during engagements. These opportunities will be communicated to the appropriate level of management.

Responsibility

The IAD has the responsibility to:

- Prepare and discuss with the Executive Director a risk-based audit plan for the upcoming fiscal year.
- Submit the audit plan to the audit committee for review and approval.
- Submit the audit plan approved by the audit committee to the EIA for review and approval. Minor, non-substantive changes requested by the EIA can be made without formal approval of the audit committee. The audit committee should be informed of any such revisions. If there are substantive changes requested by the EIA, the audit committee will have to review and formally vote on such changes. Submit approved plan to the Comptroller of the Treasury.
- Communicate to the Executive Director and the audit committee the impact of resource limitations on the internal audit plan.
- Review and adjust the internal audit plan, as necessary, in response to changes in THEC/TSAC's business, risks, operations, programs, systems, and controls.
- Communicate to senior management, the audit committee, and the EIA any significant interim changes to the internal audit plan.

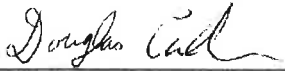
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- Ensure each engagement of the internal audit plan is executed, including the establishment of objectives and scope, the documentation of work programs and testing results, and the communication of engagement results with applicable conclusions and recommendations to appropriate parties.
- Follow up on engagement findings and corrective actions, and report periodically to senior management and the audit committee any corrective actions not effectively implemented.
- Ensure the principles of integrity, objectivity, confidentiality, and competency are applied and upheld.
- Ensure the internal audit activity collectively possesses or obtains the knowledge, skills, and other competencies needed to meet the requirements of the internal audit charter.
- Ensure trends and emerging issues that could impact THEC/TSAC are considered and communicated to senior management and the audit committee as appropriate.
- Ensure emerging trends and successful practices in internal auditing are considered.
- Establish and ensure adherence to policies and procedures designed to guide the internal audit activity.
- Ensure adherence to THEC/TSAC's relevant policies and procedures, unless such policies and procedures conflict with the internal audit charter. Any such conflicts will be resolved or otherwise communicated to senior management and the audit committee.
- Ensure conformance of the internal audit activity with the IIA Standards, with the following qualifications:
 - If the internal audit activity is prohibited by law or regulation from conformance with certain parts of the Standards, the IAD will ensure appropriate disclosures and will ensure conformance with all other parts of the Standards.
 - If the Standards are used in conjunction with requirements issued by other authoritative bodies, the IAD will ensure that the internal audit activity conforms with the Standards, even if the internal audit activity also conforms with the more restrictive requirements of other authoritative bodies.
 - Some aspects of the Standards may not be possible or applicable because there is only one internal auditor for THEC/TSAC. This will be noted in the workpapers. This would include supervision of other auditors and workpaper review.

Quality Assurance and Improvement Program

- Maintain a quality and assurance improvement program, consistent with the Standards promulgated by The Institute of Internal Auditors to ensure the effectiveness and quality of the internal audit effort.
- The Director of Internal Audit will periodically report the results of its quality assurance and improvement program to the Executive Director and the Internal Audit Committee members and obtain an external assessment of the activity at least once every five years.

Approved this 28th day of January, 2022:



Douglas Cullum, Director-Internal Audit



Pam Koban, Chair- Internal Audit Committee



Emily House, Executive Director



Lawrence Hall, Executive Internal Auditor

**TSAC Compliance Program
July 28, 2022
Brett Gipson & Pete Abernathy**

Program Changes Effective 7-1-22

- Why changes are needed

- Coordinating with Institutions

- Elements of the Review Process

- Possible Future Steps

Question & Answers

THEC Cyber Incident Response Testing

THEC recently performed two 'staged' cyber incidents. The tests were run and deemed successful. The exercises were performed to ensure that in the case of a major cyber incident, personnel are fully aware of key implementation steps to ensure a rapid response and recovery.

The focus of these exercises was on roles and responsibilities, specific activities, priorities, and further training. The exercises involved the FAST system and GEARUP program.

The specifics of the staged cyber incidents are confidential and not publicly available. A non-public conversation concerning the specifics of the staged incidents is available. Legal counsel would be present for any such conversation.



EMILY HOUSE
Executive Director

BILL LEE
Governor

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To: Dr. Emily House
From: Doug Cullum, Director- Internal Auditor
Date: March 8, 2022
Subject: Audit of the Division of Postsecondary State Authorization

The Tennessee Higher Education Commission's Office of Internal Audit has completed a review of the Division of Postsecondary Education's (DPSA) Complaint Process. Our engagement was conducted to determine compliance with Tennessee Code Annotated 49-7-2011(a)(1) for Non-Optional Expedited Authorization (OEA) institutions which states:

- Any person claiming damage or loss as a result of any act or practice by a postsecondary institution or its agent, or both, that is a violation of this part of the rules and regulations promulgated under this part, may file with the commission a verified complaint against the institution or its agent, or both.

and Tennessee Code Annotated 49-7-2022(1) for OEA institutions which states:

- The commission may investigate any signed student complaint involving institutions authorized under this section; however, initial responsibility for the investigation and resolution of complaints shall reside with the institution against which the complaint is made. For complaints not resolved at the institution level, the commission may investigate and coordinate resolution of any student complaint with the assistance of other government agencies, as necessary.

Objective

To evaluate the DPSA complaint process and determine if it adequately addresses the rules and regulations outlined in the Tennessee Code Annotated sections for OEA and Non-OEA Institutions regarding complaints.

Methodology

We interviewed DPSA administration, reviewed complaint data in the DMS and POSTSEC data systems, reviewed the User Flowchart and included written guidelines for

the Complaint Process. We also reviewed the DPSA Complaint Form (HE-0037) for appropriate wording as prescribed under TCA. The review focused on 'Formal Complaints- Submitted to DPSA', those which were received in writing from the complainant. The DPSA data entry and document retention processes were reviewed for supporting entries and reconciliation measures as posted in the DMS and POSTSEC systems.

Scope

We reviewed specific details of Formal Complaints and supporting documentation for the period July 1, 2019 – September 30, 2021. There were ninety (90) complaints for this period, of which thirty-six (36) were 'Formal Complaints- Submitted to DPSA'. Support and entries were reviewed in the two (2) complaint data systems, DMS and POSTSEC, and reconciled to supporting files. The complaint time from the initial 'Open' to the final 'Closed' period was calculated to determine if complaints were processed in a timely manner. The number of OEA complaints versus Non-OEA was calculated. Complaint outcomes were reviewed and tabulated for all formal complaints of the review period. The number of documents and correspondence per complaint was tabulated in the DMS system. Written guidelines detailed in 'Policies and Procedures Complaint Process' were reviewed and reconciled to source documents.

The Observations and Recommendations discussed below did not warrant a finding but are included in this report because of their effect on the operations of DPSA and the citizens of Tennessee. A follow-up report will be made on these Recommendations in six (6) months.

Observations

- DPSA does not maintain written guidelines (User Manual) for entries in the DMS and POSTSEC data systems. Specific guidelines are necessary for making data entries and saving documents supporting complainant claims.
- The use of dual data systems was noted as requiring significant time for making separate entries and increasing the risk of errors and omissions.
- The Better Business Bureau (BBB), School and DPSA complaint coordination is lacking. The 2007 Comptroller Audit and 2021 THEC/TSAC Internal Audit found that the complete picture of the number of complaints is not be available.
- Any reference to retaliatory measures against students for filing complaints is lacking, as referenced in the 2007 Comptroller Audit.
- Quality assurance measures are not being performed. Independent complaint review for adherence to timelines, appropriate documentation and rule adherence is not being performed.
- Risk measures and compensating controls are not included in the annual Financial Integrity Act. The Financial Integrity Act is an annual comprehensive risk assessment for THEC/TSAC. Risks inherent for the complaint process are not being analyzed, reviewed and documented on an annual basis.

Recommendations

- We recommend that DPSA update the user procedures and include written User Guidelines for data entry in the DMS and POSTSEC data systems. Clear guidelines should be prepared addressing which documents must be retained for support. The guidelines should address user identification, job position data entry requirements and supporting documentation retention requirements for all complaints.

DPSA accepts the recommendation to update the user procedures and include written User Guidelines for data entry in the DMS and POSTSEC data systems but asks that the IA work with DPSA to achieve an appropriate resolution to this finding. The Complaint Process (Revised May 2021) is an ever-evolving process that is updated as needed to capture the best explanation of the process.

DPSA also believes it is important to recognize that the Comptroller of the Treasury has made positive comments concerning DPSA's complaint process and management as a whole. In the 2014 Performance Audit, the Comptroller of the Treasury determined:

“Since the last performance audit, the division has created a complaint-tracking database, established formal policies and procedures, made staffing adjustments, and enhanced the quality of the division's website. As a result, information surrounding the process is better communicated and potential complainants can more easily file a complaint. Additionally, a sample of complaint files over the last three years revealed a procedurally fair and adequate complaint-handling process with accurate documentation. (page 30)”

Further discussion is requested with the IA regarding the IA's recommendation that the complaint process “should address user identification, job position data entry requirements.” Currently, three DPSA staff are involved in the in-take, investigation, and resolution of complaints. All three staff members should be familiar with each step of the Complaint Process (Revised May 2021) as any of the three staff members may be called upon to act during any step of the process unless explicitly stated otherwise.

- The use of a single data system is advised which would eliminate the need of duplicate entries. Communications files, documents and other support should be retained in a single location.

DPSA does not oppose a single data system that will perform the functions of both DMS and POSTSEC; however, DPSA opines that the current use of DMS and POSTSEC for complaints is efficient and the need for duplicate entries is de minimus.

As DPSA indicated to the IA, the distinction between the two systems is that DMS is a document repository and workflow management tool and

POSTSEC is a data repository with reporting capabilities. Currently, there is very little workflow associated with the DMS complaint folders. DPSA hopes to make enhancements to DMS that will improve the DMS complaint workflow and reduce the time it takes to move a filing to DMS from either TNCloud or email.

- The BBB has been reported as uncooperative in granting complaint data to DPSA. This may be revisited at a later date to make certain all institution complaints are being reviewed. Institutions with numerous complaints should receive additional scrutiny and possible further review.

DPSA disagrees with this recommendation. In January 2021, DPSA decided to discontinue this practice after considering the 2007 audit language and current information. Collecting complaint information from BBBs is not a statutory or regulatory requirement, and since the 2007 audit, DPSA staff levels and resources have diminished greatly. Soon after starting the practice in 2008, one of the BBB agencies requested that DPSA not contact them. As to the remaining BBB agencies, DPSA did not receive any complaints in 2020 that were entered in POSTSEC. In 2019, five complaints were entered into POSTSEC. In each instance an email was sent to the student advising the student of our process and the complaint was later closed because of no response from the student. This task requires the use of our resources yet does not provide any fruitful results that further the mission of DPSA.

- DPSA policies should be developed to address retaliation by schools against students who exercise their right to complain.

This can be added to the rules during a future rulemaking.

- DPSA should use quality assurance assessments, as they enhance program value and enable the complaint activity to be evaluated for conformance to regulations and established guidelines. The quality assurance review should be scheduled and performed at least annually.

DPSA requests further guidance from the IA as to this recommendation.

- Risks and compensating controls of the complaint process should be reviewed and updated on at least an annual basis or as conditions warrant. This information should be included in the Financial Integrity Act each year.

DPSA requests further guidance from the IA as to this recommendation.

**THEC/TSAC Employee
PII Access**

As of : 01/20/22

<u>Division</u>	<u>Number Employees</u>	<u>Personal Data Detail</u>	<u>How Data is Protected</u>
Academic Affairs	1	Dr License- Acad Common Market	Secure File Server
Adult Learners	7	Name & SSN on FAST Salesforce & DOC docs	Encrypted Server
Compliance	4	Name, SSN, DOB, etc- TSAC Data System	Encrypted Server
FAST-Tech Team	16	Name, SSN, DOB, etc- FAST system contains student data of anyone submitting a FAFSA	Encrypted Server & STS Firewall
Grants & Scholarships	15	Name, SSN, DOB, etc- info on FAST	Encrypted Server
Legal-HR	2	HR Staff- access to all employee records	Encrypted Server & locked office/files
Post-Secondary	7	Name, SSN, DOB, etc- on DPSA applications, student records regarding complaints	Encrypted Server & locked office/files
Veteran Affairs	4	VA students names, SSN, school & employer	Encrypted Server & locked office/files
Research& Planning/SIS Team	11	Personal info-Name SSN-within FAST & SIS	Encrypted Server & VPN access
Student Access & Success	<u>13</u>	Name & SSN	Password & Encrypted server
Total		80	