

APPENDIX 1

RESPONSE TO PEER EVALUATION REPORT OF THE POLICIES, REGULATIONS AND FINANCIAL REVIEW (MARCH 2021)

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<p>2.A1 The institution demonstrates an effective governance structure, with a board(s) or other governing body(ies) composed predominantly of members with no contractual, employment relationship, or personal financial interest with the institution. Such members shall also possess clearly defined authority, roles, and responsibilities. Institutions that are part of a complex system with multiple boards, a centralized board, or related entities shall have, with respect to such boards, written and clearly defined contractual authority, roles, and responsibilities for all entities. In addition, authority and responsibility between the system and the institution is clearly delineated in a written contract, described on its website and in its public documents, and provides the NWCCU accredited institution with sufficient autonomy to fulfill its mission.</p>	<ul style="list-style-type: none"> <input checked="" type="checkbox"/> Institutional governance policies and procedures <input checked="" type="checkbox"/> System governance policies and procedures <input checked="" type="checkbox"/> Multiple board governing policies and procedures <input type="checkbox"/> Board’s calendar for reviewing institutional and board policies and procedures <input checked="" type="checkbox"/> Bylaws and Articles of Incorporation referencing governance structure 	<p><input checked="" type="checkbox"/> Needs improvement</p>
<p>RATIONALE: The Great Fall College - Montana State University (GFC-MSU) has relevant board policies related to academic programs and mission statement (Board policy 219). The Board of Regents website has other relevant system governance policies, specifically the by-laws and state government policies and procedures. However, the panel did not find a calendar for reviewing institutional and board policies and procedures. The panel also felt that a more through narrative on the governance structure would have helped to provide clarity on the relationship and dependence of Great Falls College and the MSU system.</p>		

Review of institutional and board policies and procedures

Following the peer evaluation report, Great Falls College developed a three-year [schedule](#) to review its policies and procedures, assigning each policy a priority and a responsible party. To date 58 of 162 policies have been reviewed — three have required substantive changes and 18 have been removed. Policies under review are posted on the [policy page](#) for campus comment.

The college also created a [crosswalk](#) between Great Falls College, Montana State University and Board of Regents policies to ensure consistency.

The colleges’ governing board is the Montana Board of Regents, which oversees the entire Montana University System. The board lists policies on its [web site](#). Policies are

updated as needed.

“The Office of the Commissioner of Higher Education (OCHE) does not have a published calendar specifying when Board of Regent (BOR) policies will be reviewed, but rather employs a Policy Coordinator, who is responsible for (among other things) facilitating the continuous review and improvement of BOR Policy. The Policy Coordinator leads a review committee that meets regularly and is tasked with systematically analyzing and recommending policy updates to OCHE leadership, and eventually the BOR for approval.” Margaret Wallace, Director of Assurance and Enterprise Risk, Office of the Commissioner of Higher Education, Montana University System (email, 2/1/2022).

Montana University System governing structure

Great Falls College is a stand-alone, two-year institution under the administrative control of Montana State University (MSU), one of two flagship universities in the Montana University System. State law defines MSU as a unit of the university system and defines Great Falls College as a campus of MSU ([Montana Code Annotated 20-25-201](#)), The Law ([Montana Code Annotated 20-25-305](#)) outlines the duties of the president of Montana State University, “[s]ubject to the supervision of the regents.”

Great Falls College’s dean/CEO answers directly to the president of MSU. The college sets its own budget, subject to review by MSU. Hiring decisions are the prerogative of Great Falls College, although the college needs approval to hire a new top-level position or fill a top-level vacancy. Spending and contracts are determined locally but approval is required for expenditures or contracts above limits set in state law.

Academic programs and administrative departments also are independent of the flagship, although in some cases Montana State University campuses share resources. For example, MSU campuses typically work together on Information Technology issues and purchase bulk licenses for software and services to save money. The college awards its own degrees and certificates and determines graduation requirements.

The college is independently accredited by NWCCU and several of its academic programs are accredited independently by professional organizations.

Cybersecurity

2.C.4 The institution's policies and procedures regarding the secure retention of student records must include provisions related to confidentiality, release, and the reliable backup and retrievability of such records.	<input checked="" type="checkbox"/> Policies/procedures regarding secure retention of student records, i.e., back-up, confidentiality, release, protection from cybersecurity issues or other emergencies	<input checked="" type="checkbox"/> Needs improvement
RATIONALE: Cybersecurity is an area of growing concern in higher academia. While there was information on record retention and related topics, we saw no clear content regarding protection from cyber security threats. Montana State University provides technology and cybersecurity services to the institution.		

Great Falls College, as one of the Montana State University campuses, is working to upgrade its cybersecurity protections. Since conducting a cybercrimes audit in October 2021, the campuses have been developing a comprehensive plan to address issues identified in that report.

Specifically, Great Falls College will:

- Document the college's response to a ransomware attack.
- Review and update security incident policies.
- Develop and document procedures and training.
- Develop and test data backups.
- Update or establish written identity theft policies and training programs.

The college has developed an Identity Theft Prevention Program pursuant to the Federal Trade Commission's ("FTC") Red Flags Rule to:

1. Identify relevant Red Flags for new and existing covered accounts and incorporate those Red Flags into the program;
2. Detect Red Flags that have been incorporated into the program;
3. Respond appropriately to any Red Flags that are detected to prevent and mitigate Identity Theft; and
4. Ensure the program is updated periodically to reflect changes in risks to students or to the safety and soundness of the student from Identity Theft.

The program was adopted in 2011.