

MCC College Contracts Policy

Executive Summary of Feedback Received from the Policy Portal

One (1) individual submitted comments in the policy portal during the College Contract Policy comment period. A summary of the comments and a response is provided below.

Summary of the Comments:

Background: The College's external Audit firm (Bonadio Group) and the College's external data security consultant (GreyCastle) have advised the College that MCC is not in full compliance with vendor risk management NIST 800-53 Information Security Standards. MCC is responsible for ensuring that any third parties with whom we share non-public MCC data have controls in place to protect that data in accordance with applicable laws and standard. Technology Services conducts a security assessment with most software vendors that the College contracts with; however this assessment does not necessarily take place with non-software vendors with whom the College may share data with.

Commenter's Suggestions:

- 1) Stronger language should be inserted into the revised College Contracts Policy that requires all vendors be assessed prior to contract signature to ensure adequate controls are in place to protect College data.
- 2) At the suggestion of both Bonodio and GreyCastle, the College should launch a project to implement a full Vendor Risk Management process, to address any gaps that may exist so any applicable contract is not signed prior to undergoing a vendor risk assessment.

Administrative Response:

Contracts with vendors that may have access to College data, are a small subset of the myriad of contracts actually signed by a College official. We agree the College should launch a project to implement a full Vendor Risk Management process for applicable vendors. That project will no doubt take some time to complete. In the interim, we recommend the current revisions to the Contracts Policy should move forward for approval by the Board of Trustees. The current revisions provide a clearer understanding of how contracts are currently managed at the College. Once the Vendor Risk Management process is developed and approved for implementation, the Contracts Policy should once again be updated to reflect any procedure changes resulting from the Vendor Risk Management process.