Good Morning,

Thank you for attesting to the Federal Student Aid (FSA) Cybersecurity Compliance Team indicating that you have satisfied the minimum information security requirements under Gramm-Leach-Bliley Act (GLBA) at Laney College for the audit year of 2021. As a courtesy, we remind you that all the GLBA Cybersecurity requirements are to be satisfied each audit year. Protecting student data is an utmost priority for FSA and we are committed to ensuring the safety and security of student information.

We have reviewed the information you provided and determined it sufficient to close the case.

Thank you again for your attention to this matter. Should you have any additional questions or concerns, please contact FSA_IHECyberCompliance@ed.gov.

Sincerely,

Tina Gallagher
FSA Cyber Compliance Team
FSA_IHECyberCompliance@ed.gov
FSA Cybersecurity Compliance | Knowledge Center

From: Antoine Mehouelley <amehouelley@peralta.edu>
Sent: Wednesday, September 7, 2022 2:51 PM
To: Jennifer Ma <jenniferma@peralta.edu>; FSA_IHECyberCompliance <FSA_IHECyberCompliance@ed.gov>
Cc: David.Robeydek@claconnect.com; Mildred Lewis <mildredlewis@peralta.edu>; Rudy Besikof <rbesikof@peralta.edu>; Marlon Hall <mhall@peralta.edu>; Joseph Koroma <jkoroma@peralta.edu>; Ken Lira <alira@peralta.edu>; Daniel Park <dpark@peralta.edu>; Marla Williams-Powell <mwpowell@peralta.edu>
Subject: RE: GLBA Audit Finding: Laney College INC-327276

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Hello Jennifer and Tina,

Please send my response to your questions. I apologize for the delay in getting back to you.

GLBA Requirement Questions;

1. Please provide the independent auditor or F.S.A. with a "designated individual to coordinate the information security program." Also known as Information Technology Point of Contact (IT-POC)

   The CTIO, along with the InfoSec Administrator, coordinates the information security program for the Peralta District.

2. Have you or your school completed a risk assessment that addresses the three required areas described in 16 C.F.R. 314.4(b), which are:

   a. Employee training and management.

      A security awareness program for Peralta employees training is provided to identify phishing attempts and other malware attacks. In addition, employees are provided guidelines on the appropriate use of computing technologies, password policies, and multi-factor authentication for system access (M.F.A.).

   b. Information systems, including network and software design, as well as Information processing, storage, transmission, and disposal; and

      Peralta's data network is based on segmented network architecture. Developers adhere to secure coding practices for enterprise applications. Encryption policies are in place for mobile devices such as laptops and notebooks. Data sanitization procedures are also utilized to minimize data from being exfiltrated. A Third-Party Risk Management/Assessment program has been established to ensure outside entities' safe and proper processing of Peralta's data assets.

   c. Detecting, preventing, and responding to attacks, intrusions, or other systems failures

      Peralta employs several key technologies and platforms to detect, prevent and respond to the unauthorized use of its systems. These include: Cisco Next-Gen Firewalls, Cisco I.S.E. identity and access control policy platform, M.F.A. requirements, TrendMicro End Point Detection, and Microsoft's Defender Enterprise security platform

      Also, the District I.T. department operates a staffed Network/Security Operations Center (NOC/SOC)

3. Do you have appropriate safeguards in place to mitigate identified risks related to all areas in the Risk Assessment?

   A District-level Cyber Incidence Response Plan (CIRP) actively addresses cyber-related incidents. In addition, a security roadmap has also been developed to continuously improve and advance Peralta's cybersecurity program.

Thank you!

Antoine Mehouelley
Chief Technology & Information Systems Officer
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