Cape Cod Community College

Internal Control Plan
and
Enterprise Risk Management

2019
President's Message

November 15, 2019

To the College Community,

In accordance with Massachusetts General Laws Chapter 647 of the Acts of 1989, we present Cape Cod Community College’s Risk Assessment & Internal Control Plan.

Chapter 647 of the Acts of 1989, An Act Relative to Improving Internal Controls within State Agencies, establishes minimum level of quality acceptable for the Internal Control System in operation throughout state departments, agencies and colleges. The Office of the State Auditor and the Office of the State Comptroller are legislatively mandated to enforce this state law. The internal control process has five components:

1. control environment
2. risk assessment
3. control activities
4. information and communication
5. monitoring

The internal controls exercised over individual activities, when taken collectively, become the internal controls of the College and comprise the College’s internal control documentation. This documentation, the Risk Assessment & Internal Control Plan, is a high level overview describing, referencing and summarizing the College’s risk and the controls in place to mitigate those risks.

Management’s role is to provide the leadership with the necessary internal controls that the College needs while achieving its goals and objectives. Internal controls are the structure, policies and procedures used to help ensure that management accomplishes its objectives and meets its responsibilities effectively and efficiently and in compliance with applicable rules, regulations and laws. Thus, it is imperative that the Risk Assessment & Internal Control Plan be updated on an annual basis.

If there are any comments, questions or suggestions regarding this plan, please contact Lisa Kopecky, Vice President of Finance and Operations at 774-330-4303.

Sincerely,

John L. Cox, Ed.D., CPA
President
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Cape Cod Community College
Internal Control Plan

SECTION 1 - INTRODUCTION

Massachusetts General Laws Chapter 647, An Act Relative to Improving the Internal Controls within State Agencies, was passed into law on January 3, 1990 and became effective April 3, 1990 (Appendix 1). The law establishes internal control standards that define the minimum level of quality acceptable for internal control systems in operation throughout the various state departments. It constitutes the criteria against which such internal control systems will be evaluated. Internal control systems must, of course, include all aspects of department business (i.e., programmatic and financial). These standards are outlined below.

• Documentation. Internal control systems of the department are to be clearly documented and readily available for examination.

• Transactions. All transactions and other significant events are to be promptly recorded, clearly documented, and properly classified.

• Authority. Transactions and other significant events are to be authorized and executed only by individuals acting within the scope of their authority.

• Segregation of Duties. Essential duties and responsibilities should be assigned systematically to ensure that effective checks and balances exist. They include the following:

  1. Authorizing, approving, and recording transactions.
  2. Issuing and receiving assets.
  4. Reviewing or auditing transactions.

• Supervision. Qualified and continuous supervision is to be provided to ensure that internal control objectives are achieved.

• Access. Access to resources and records is to be limited to authorized individuals as determined by the department head. The department head is responsible for maintaining accountability for the custody and use of resources and shall assign qualified individuals for that purpose. Periodic comparison shall be made between resources and accounting records to reduce the risk of unauthorized use, loss, waste, and wrongful acts.

In addition to the aforementioned, the Office of the Comptroller issued a revised Internal Control Guide in 2007, which incorporates the principles of Enterprise Risk Management.

Chapter 647 requires that a senior official, equivalent in title to an assistant or deputy to the agency head, in addition to his or her regular duties, be assigned responsibility for the department's internal control. This individual is the department’s Internal Control Officer. The Internal Control Officer for Cape Cod
Community College is Lisa J. Kopecky, Vice President for Finance & Operations and Chief Financial Officer. Responsibilities of the Internal Control Officer include the following:

- Have available on file written documentation of the department’s internal accounting and administrative control system for review by the Office of the Comptroller, Office of the Secretary of Administration & Finance, and Office of the State Auditor.

- Evaluate the effectiveness of the department’s internal control system at least annually or more often, if conditions warrant. At that time, establish and implement any changes necessary to ensure the continued integrity of the system. The Finance Committee of the Board of Trustees should be presented with any proposed changes for their approval.

- Evaluate the results of audits and recommendations to improve internal controls promptly.

- Implement timely and appropriate corrective actions in response to an audit.

- Address all actions determined necessary to correct or otherwise resolve internal control issues through a budget request to the Governor and Legislature as appropriate.

- Immediately report all variances, losses, shortages, or thefts of funds or property to the Office of the State Auditor (OSA). The statute specifically requires this action.

OSA reviews reported variances, losses, shortages, or thefts to determine the amount involved and convey the facts to appropriate management and law enforcement officials. OSA then determines the internal control weaknesses that allowed the problem to occur and recommends changes to department management so that these weaknesses can be corrected. Department management must immediately implement policies and procedures necessary to prevent a recurrence of the condition, based upon OSA recommendations (Appendix 2).

OSA participates in establishing guidelines for the review of internal control plans. In conjunction with the Statewide Single Audit, OSA reviews department plans.
SECTION 2 - INTERNAL CONTROLS: AN OVERVIEW

Internal Control Objective

To ensure that overall organizational structure and controls are conducive to accomplishing the mission and objectives of the College.

Policy

1. The College shall have:
   a. A mission statement
   b. Documented goals and objectives
   c. Assessed and documented risks that could hinder meeting objectives
   d. An organizational chart
   e. Written job description for all employees
   f. A budgetary, revenue, purchasing, payroll and resource management control system in place with objectives
   g. A policy and procedures manual
   h. A reporting system, which adequately focuses on management requirements and provides timely information for both internal and external constituents

2. The College shall make every effort to achieve segregation of duties among fiscal affairs employees.

3. The Internal Control Documents, which include 2 manuals (“Internal Control Plan” and “Internal Controls: Fiscal Accounting Policies and Procedures Manual”), should be read in conjunction with each other. These documents are to be reviewed and updated at a minimum of once per year.

4. All findings as a result of an audit shall be reviewed and corrected by the appropriate College administrator in a timely manner.

5. All instances of unaccounted variances, losses, shortages or thefts of funds or property are to be immediately reported to the State Auditor’s Office as required by Chapter 647 of the Acts of 1989.

Every organization (i.e., governmental, for-profit, or not-for-profit) exists to achieve some purpose. The purpose of Cape Cod Community College is outlined in its mission statement (Appendix 3). It is the role of management to provide the leadership necessary for the College to realize its goals and objectives. Internal controls are a coordinated set of policies and procedures to facilitate this essential process.

A comprehensive framework of internal controls consists of the following eight interrelated components:

1. Internal Environment. This is the foundation for all other components of internal control, encompassing such factors as integrity and ethical values, commitment to competence, Board of Trustees and Audit Committee participation, management’s philosophy and operating style, organizational structure, assignment of authority and responsibility, and policies and practices for human resources.
2. **Objective Setting.** This component is driven by the strategic plan and links the mission statement with key strategies and tactics.

3. **Event Identification.** It is important to identify significant internal and external events that could prevent the College from fulfilling its mission and achieving its objectives.

4. **Risk Assessment.** This component identifies, analyzes, and manages the potential risks that could prevent management from achieving its objectives. Change is one factor that can be used to identify risks. Another is inherent risk usually associated with assets that can be readily converted to personal use.

5. **Risk Response.** This component evaluates options to address an identified risk and determines a course of action. Options include (1) accept the risk and monitor it, (2) avoid the risk by eliminating it, (3) reduce the risk by implementing controls, and (4) share the risk with another entity.

6. **Control Activities.** These are the policies and procedures needed to address the risks identified that could prevent management from achieving its objectives. Control activities generally relate to proper authorization of transactions, security of assets and records, and segregation of duties.

7. **Information and Communication.** Information provided to staff should be appropriate in content, timely, current, accurate, and accessible. Communication takes such forms as policy manuals, accounting and financial reporting manuals, policy memoranda, emails, and regularly scheduled staff meetings.

8. **Monitoring.** It is the responsibility of management to monitor control activities continually to ensure that they function properly as well as take the corrective action necessary to resolve potential problems or weaknesses in a timely manner. This component also involves evaluating the effectiveness of controls.

A. **INTERNAL ENVIRONMENT**

*Definition*

The internal environment is the tone of an organization, which, among other things, determines an organization’s “risk culture” and provides the basis for its internal controls.

*Overall Objective*

The organization will provide discipline and structure as well as promote integrity and ethical values at all levels for the purpose of attaining its objectives and meeting its responsibilities.

*Specific Objectives*

1. The organization has a mission statement and strategic objectives.
2. There is a current organizational chart in use which specifies authority, responsibility, and reporting lines.

3. The organization has established an official set of policies governing employee conduct.

4. The organization has established and maintains up-to-date job descriptions for all employees.

5. The organization follows appropriate hiring policies.

6. Authority and responsibility are assigned in an appropriate manner.

7. Employees are properly trained.

8. Employees are periodically reviewed and performance is documented.

9. The organization has established performance goals and criteria for promotion.

10. The organization has developed and maintains formalized policies and procedures.

11. The organization has established a budgetary control system.

12. The Board of Trustees utilizes the Finance Committee as an Audit Committee.

13. The organization retains O’Conner & Drew, an independent accounting firm, to conduct an annual financial audit and A-133 audit.

B. OBJECTIVE SETTING

Definition

Objective setting is a critical process of establishing priorities that support an organization’s mission.

Overall Objective

The Board of Trustees approved a new strategic plan for Cape Cod Community College in March 2014. The current comprehensive plan was developed during the 2013-2014 academic year by a committee that represented all major constituencies and utilized support from an outside consultant. The College has implemented the plan in a structured, disciplined, and energetic manner. The “planning phase” for an updated plan is underway during the 2019-2020 academic year.

Specific Objectives

The following strategic goals and objectives were identified through the planning process:
1. Empower student success by providing opportunities and pathways to achieve their goals
   1.1 Focus on improving student outcomes of retention, graduation and transfer
   1.2 Incorporate the student learning outcomes of civic learning and civic engagement into the general education graduation requirements

2. Integrate the College and community through partnerships that achieve shared objectives
   2.1 Create additional community and college connections
   2.2 Expand the opportunities for students to be involved with the community via volunteer, service learning, civic engagement and/or workforce experience
   2.3 Increase college readiness through outreach and partnerships

3. Create operational and academic excellence through continuous improvement
   3.1 Achieve higher levels of student learning through development of a systematic process of assessment of student outcomes and more extensive use of assessment results
   3.2 Develop and implement a systematic process for planning and institutional effectiveness for non-academic departments
   3.3 Develop and implement a systematic process for long-term academic planning, including new programs and allocation of faculty lines

4. Ensure the financial stability and long term sustainability of the institution through a culture of innovation
   4.1 Revise the collegial governance structure to foster collaborative and transparent methods of decision making and resource allocation
   4.2 Develop resources and infrastructure to meet future challenges
   4.3 Develop and implement clear and accessible policies and procedures
   4.4 Strengthen College-wide communications
   4.5 Introduces new employees and announces employee departures

C. EVENT IDENTIFICATION

Definition

Event identification captures internal and external events that may have a significant impact upon the achievement of objectives within an organization. Events that may have a negative impact represent risks, while those that may have a positive impact represent opportunities.

Analysis

In conjunction with the broader categories of risk assessment, the College has identified the following events for ongoing monitoring and management:
1. Declining enrollment.
2. Growing percentage of students with profound needs (i.e., academic and other).
3. Growing deferred maintenance needs.
4. New website.
5. IT security SANS Top 5.
7. Demographic changes on the Cape and Islands.
8. One-Stop Intake area.
10. Increased competition from online schools.
11. Increased competition from four-year schools.
12. Poor reputation in the community.

D. RISK ASSESSMENT & RESPONSE

Definition

Risk assessment allows an organization to understand the extent to which potential events may affect objectives. Risks should be assessed from both the likelihood of happening and the impact if they happen.

Risk response evaluates options to an identified risk and determines the course of action. Options available are (1) accept the risk and monitor it, (2) avoid the risk by eliminating it, (3) reduce the risk by implementing controls, and (4) share the risk with another entity.

Analysis

Internal control includes all aspects of an organization’s activities. In preparing a department-wide internal control plan, the starting point is the identification and analysis of risks that could prevent the organization from reaching its goals and objectives as defined by its mission statement.
## Internal Control Plan

### Probability and Severity

<table>
<thead>
<tr>
<th>Probability</th>
<th>Severity</th>
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<tbody>
<tr>
<td>1 – Extremely Low</td>
<td>1 – Extremely Low</td>
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<tr>
<td>2 – Low</td>
<td>2 – Low</td>
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<tr>
<td>3 – Medium</td>
<td>3 – Medium</td>
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<tr>
<td>4 – High</td>
<td>4 – High</td>
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<tr>
<td>5 – Very High</td>
<td>5 – Very High</td>
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</tbody>
</table>

### Risk Type, Risk, Potential Impact, Actions Taken to Minimize Risk, Probability, Severity

<table>
<thead>
<tr>
<th>Risk Type</th>
<th>Risk</th>
<th>Potential Impact</th>
<th>Actions Taken to Minimize Risk</th>
<th>Probability</th>
<th>Severity</th>
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<tbody>
<tr>
<td>Viability</td>
<td>Poor academic reputation and competitive position</td>
<td>Inability to attract quality students, faculty and staff, which would undermine programs and services</td>
<td>Annual assessment plan and review of programs; program diagnostics; increase rigor by hiring qualified and skilled personnel; dedicated marketing and recruitment effort to attract both traditional and non-traditional students from local area and beyond</td>
<td>1</td>
<td>3</td>
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<tr>
<td>Loss of accreditation</td>
<td>Reduction in programs and services, including loss of federal funds, and impact on enrollment</td>
<td>Establishment and adherence to robust strategic priorities, mission, vision, academic standards and policies</td>
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<td>3</td>
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<tr>
<td>Poor financial health and performance</td>
<td>Impedes planning and provision of resources necessary to maintain high quality and competitive programs and services</td>
<td>Revenue is driven by student enrollment and state appropriations over which it has some, but limited, influence; reduce the risk by implementing controls; will continue to emphasize the importance of careful expense management</td>
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<tr>
<td>Lack of enrollment and success</td>
<td>Reduction in resources and offerings resulting from demographic trends, program weaknesses, adverse publicity within service area or ability to maintain a competitive position with respect to peers</td>
<td>Track local area demographic trends; increase enrollment efforts; revise catalog and schedule (including modality); refine enrollment / recruitment / outreach plans</td>
<td></td>
<td>3</td>
<td>3</td>
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<tr>
<td>Lack of sufficient student support services</td>
<td>Retention and time to degree impacted</td>
<td>Regularly adapt to support emerging needs and priorities with intentional outreach, training, monitoring, communication and follow up</td>
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<td>3</td>
<td>3</td>
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<tr>
<td>Interruption of auxiliary services (bookstore, cafeteria, vending)</td>
<td>Reduction in services to students, faculty, staff and guests</td>
<td>Contracts are in place with regular status reviews</td>
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<tr>
<td><strong>Staffing</strong></td>
<td>Failure to attract and retain quality and diverse faculty and staff</td>
<td>Restricts ability to offer mission-critical programs and services</td>
<td>College has low turnover and is successful at recruiting qualified individuals</td>
<td>1</td>
<td>4</td>
</tr>
<tr>
<td>Lack of sufficient staffing in specialized areas</td>
<td>Redundancy and ability to move impactful priorities forward is difficult</td>
<td>Cross-train and/or document processes and backfill with other resources to the extent possible</td>
<td>2</td>
<td>4</td>
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<tr>
<td>Failure to inform or train faculty and staff and to ensure compliance with HR and other mandatory and/or reporting policies and procedures</td>
<td>Downtime, loss of productivity or support, breaches, penalties, dissatisfaction</td>
<td>Regular oversight, communications, outreach, training and status reviews for compliance with legal / regulatory / policies / contract requirements regularly conducted</td>
<td>2</td>
<td>4</td>
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<tr>
<td><strong>Controls &amp; Reporting</strong></td>
<td>Qualified opinion from independent financial auditors</td>
<td>Impedes ability to enter into or maintain debt covenants and other contractual agreements</td>
<td>Continue to emphasize the importance of these annual financial audits with careful attention by management, a comprehensive review by the Finance Committee, and open discussion with the Board of Trustees</td>
<td>2</td>
<td>3</td>
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<tr>
<td>Non-Compliance with Federal and State funding agencies or loss of student financial aid eligibility</td>
<td>Restitution of funds, loss of contracts, and reduction in programs, services, and aid to students; could seriously affect the level of resources available to students and student access to programs and services</td>
<td>Federal and state policies and procedures are followed with high level of technical knowledge and attention to detail; prompt and appropriate follow up on any issue</td>
<td>1</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Financial fraud committed against the College</td>
<td>Assets converted to personal use, depriving the organization of resources necessary to achieve its goals and objectives</td>
<td>Segregation of duties; audits; refinement of internal controls; adherence to policies and procedures</td>
<td>2</td>
<td>5</td>
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<tr>
<td>Failure to segregate duties of fiscal affairs employees</td>
<td>Insufficient oversight and potential for fraud</td>
<td>Documented procedures with reviews and approval checks and balances are in place</td>
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<td>Failure to ensure appropriate approvals are in place for commitment and spending of funds</td>
<td>Fiduciary responsibility and prudent use of funds not reinforced</td>
<td>Budget hierarchy and use of online automated purchasing module with approval tracks are in place</td>
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<tr>
<td>Financial, data and other transactions not processed or reported in a timely or accurate manner</td>
<td>Impacts planning, student and fiscal status, confidence and reporting of accurate outcomes</td>
<td>Work closely with respective offices to refine data entry and to catch errors; continue to enhance and refine data collection and analysis and automate where possible</td>
<td>2</td>
<td>2</td>
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<tr>
<td>Proper controls not in place for establishment of and updates to payee information and processing of payments</td>
<td>Potential fraud, overpayments and penalties</td>
<td>Segregation of duties, internal controls and verifications in place</td>
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<td>2</td>
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<tr>
<td>Systems &amp; Security</td>
<td>Lack of information technology security and access; digital information processing systems not properly secured</td>
<td>Unauthorized access from either external or internal sources could compromise information or systems and severely affect ability to serve student population and meet business needs</td>
<td>While fiscal constraints do not allow for full support in-house; actively pursue all shared and no cost services/options available; internal access to systems is specifically authorized and updated</td>
<td>2</td>
<td>5</td>
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<tr>
<td>Lack of disaster recovery planning</td>
<td>Inability to provide system availability and recoverability in the event of hardware or infrastructure failure could prevent normal operations</td>
<td>Refinement of emergency response plan to include further emphasis on disaster recovery</td>
<td>4</td>
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<tr>
<td>Building hours and operational needs not closely monitored; lack of monitoring devices</td>
<td>Security, use and access is not maximized</td>
<td>Building hours and activities are closely monitored with active outreach, foot patrol, input and regular communication between multiple offices</td>
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<td>Internal Control Plan 11 August 2019</td>
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<tr>
<td>Records are not properly safeguarded, maintained and/or disposed of in accordance with State and Federal requirements</td>
<td>Potential for unauthorized access and use of information</td>
<td>Sensitive and/or protected records are stored in secured spaces, other files and records are properly labeled and stored at the close of each fiscal year, and are disposed in compliance with record retention guidelines</td>
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<td>5</td>
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<td>Outdated IT systems / hardware</td>
<td>Detracts from operations and student learning</td>
<td>Multi-year replacement plans adopted as funding permits; pursue cloud solutions when appropriate</td>
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<td>4</td>
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<td>Asset Management</td>
<td>Poor condition of facilities, classrooms and/or grounds</td>
<td>Lack of deferred maintenance or failure to comply with health, safety, environmental, or other regulations would result in the closure of buildings and/or diminished learning environment</td>
<td>Facilities operations staffing augmented; structure to better align day-to-day maintenance and more technical predictive / preventative critical systems maintenance in place; ongoing training and reinforcement provided; state approved consultants used to enhance oversight and planning</td>
<td>2</td>
<td>3</td>
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<tr>
<td>Lack of capital improvement, deferred maintenance, emergency reserve funds</td>
<td>Difficult to plan for and implement larger or more costly improvements or react to unexpected emergencies</td>
<td>Proactively pursue State and donated funds to the extent possible and as funds become available</td>
<td>3</td>
<td>5</td>
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<tr>
<td>Failure to inspect goods delivered to campus to ensure they are in proper condition and delivered to recipient in expeditious manner</td>
<td>Miss opportunity to return or replace purchased items</td>
<td>Shipping, receiving, condition verification and delivery conducted daily by Storekeeper or other direct recipients with backup provided when needed</td>
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<td>2</td>
<td></td>
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<tr>
<td>Failure to perform an annual fixed asset inventory</td>
<td>Loss of state assets due to theft</td>
<td>Inventory control manager and procedures are in place to insure all fixed assets are accounted for and inventoried on an annual basis</td>
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<td>2</td>
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**F. CONTROL ACTIVITIES**

**Definition**

An organization’s control activities include policies and procedures, directives, etc. They occur throughout the organization at all levels and functions.

**Mission and Purposes**

The institution has a mission and set of purposes appropriate for higher education, which are consistent with its charter or other operating authority and implemented in a manner that complies with the Standards of the Commission on Institutions of Higher Education.

**Planning and Evaluation**

The institution undertakes comprehensive planning and evaluation to accomplish the achievement of its mission and purposes.

**Organization and Governance**

The institution has a system of governance that facilitates the successful accomplishment of its mission and purposes. Through its organizational design and governance structure, the institution creates and sustains an environment that encourages teaching, learning, scholarship, and research. It assures provision of support adequate for the appropriate functioning of each organizational component.
Programs and Instruction

The institution’s programs are consistent with, and serve to fulfill, its mission and set of purposes. Each educational program demonstrates consistency through (1) its goals, structure, and content, (2) policies and procedures for admission and retention, (3) instructional methods and procedures, and (4) the nature, quality, and extent of student learning and achievement. The institution provides sufficient resources to sustain and improve programs and instruction.

Faculty

Faculty qualifications, numbers, and performance are sufficient to accomplish the institution’s mission and purposes. Faculty competently offer the institution’s academic programs and fulfill those tasks appropriately assigned to them.

Student Services

The institution provides an environment that fosters the intellectual and personal development of students consistent with its mission, set of purposes, and mode of educational delivery. It is sensitive to the non-academic needs of its students and recognizes that their educational experience consists of an academic component and interrelated developmental opportunities provided through a co-curricular program of student services. These services are guided by a philosophy, which is disseminated and reviewed on a regular basis. This approach is conducive to the development of a shared learning community, which prepares students to become responsible members of society.

Library and Information Resources

The institution makes available the library and information resources necessary for the fulfillment of its mission and purposes. These resources support the academic and research program as well as the intellectual and cultural development of students, faculty, and staff. Library and information resources may include the holdings, necessary services, and equipment of libraries, media centers, computer centers, language laboratories, museums, and any other repositories of information or technological systems required for the support of institutional offerings. Clear and disseminated policies govern access, usage, and maintenance of the library, information resources, and services. The institution ensures that students use these resources as an integral part of their education.

Physical Resources

The institution has sufficient and appropriate physical resources, including laboratories, network infrastructure, materials, equipment, buildings, and grounds, whether owned or rented. These physical resources are designed, maintained, and managed at both on- and off-campus sites to serve institutional needs as defined by its mission and set of purposes. Classrooms and laboratories, real or virtual, and other facilities are appropriately equipped and adequate in capacity. Proper management, maintenance, and operation of all physical resources and virtual environments are performed by adequate and competent staffing.

Financial Resources

The institution is financially stable, which is not achieved at the expense of educational quality. The institution’s financial resources are sufficient to sustain the achievement of its educational objectives and further institutional improvement now and in the foreseeable future. The institution reallocates resources as necessary to achieve its purposes and objectives. All or substantially all of the institution’s revenue is
devoted to the support of its educational purposes and programs. The institution has the ability to respond to financial emergencies and unforeseen circumstances.

Public Disclosure

In presenting itself to students and other members of the interested public, the institution provides information that is complete, accurate, and clear.

Integrity

The institution embodies, exemplifies, and promotes high ethical standards in the management of its affairs and in all of its dealings with students, faculty, staff, external organizations, and the general public.

Programmatic

As an institution of higher education, Cape Cod Community College is a member of the New England Commission of Higher Education (NECHE), the regional accreditation agency for colleges and universities in the six New England States (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, and Vermont). The Commission is recognized by the U.S. Secretary of Education as a reliable authority on the quality of education for the institutions it accredits.

Institutions of higher education achieve accreditation from NECHE through its Commission on Institutions of Higher Education by demonstrating that they meet the Commission's Standards for accreditation and processes are consistent with the quality, improvement, accountability, and expectations that the Council for Higher Education Accreditation (CHEA) has established.

The Commission adopts policies which elucidate the standards and relate to their application. Moreover, the Commission expects affiliated institutions to work toward improving their quality, increasing their effectiveness, and achieving excellence. Its evaluative processes are designed to encourage such improvement.

Each of the eleven standards encompasses a principal area of institutional activity. In applying the standards, the Commission assesses and makes a determination about the effectiveness of the institution as a whole. The institution that meets the standards …

- Has clearly defined purposes appropriate to an institution of higher education.
- Has assembled and organized those resources necessary to achieve its purposes.
- Is achieving its purposes.
- Has the ability to continue achieving its purposes.

Institutions of higher education desiring recognition by NECHE are expected to abide by the standards. Affiliated colleges and universities manifest their integrity through continued voluntary adherence to these criteria. Compliance is periodically reviewed through peer evaluations. These are preceded by self-studies directed toward demonstrating both adherence to the standards and institutional improvement. The self-regulatory nature of accreditation assumes that institutions agree to participate in, accept, and profit by an honest and forthright assessment of institutional strengths and weaknesses. Cape Cod Community College submitted its self-study for re-accreditation consideration in February, 2018. Continuation approval was granted with an interim (fifth-year) report due in Spring 2023; the next comprehensive evaluation will be scheduled Spring 2028.
Administrative and Financial Controls

The design and evaluation of controls over accounting and financial reporting are made more manageable by grouping similar or related activities into what are commonly referred to as “control cycles.” This approach also provides a logical framework and underscores the relationships that exist among the many control-related policies and procedures.

Control cycles are generally defined by business processes within the organization having to do with sources and uses of funds. Each control cycle has specific objectives and potential risks that can prevent management from meeting its objectives. A practical means of identifying potential risks or weaknesses is by using management’s implicit assertions of (1) existence or occurrence, (2) completeness, (3) rights and obligations, (4) allocation, and (5) presentation and disclosure.

Control-related policies and procedures designed to compensate for such risks are categorized as (1) authorization, (2) properly designed records, (3) security of assets and records, (4) segregation of duties, (5) periodic reconciliations, (6) periodic verifications, (7) analytical review, and (8) timely preparation of financial reports in conformity with generally accepted accounting principles.

The following control cycles have been identified as significant to the College in achieving its goals and objectives: (1) budgetary process, (2) revenue cycle — revenue by source, accounts receivable, and cash receipts, (3) purchasing cycle — expenditures, payables, and cash disbursements, (4) payroll cycle, and (5) resource management — cash, investments, and fixed assets.

Standards for Accreditation

Library and Other Information Resources

The institution makes available the library and information resources necessary for the fulfillment of its mission and purposes. These resources support the academic and research program and the intellectual and cultural development of students, faculty, and staff. Library and information resources may include the holdings and necessary services and equipment of libraries, media centers, computer centers, language laboratories, museums, and any other repositories of information or technological systems required for the support of institutional offerings. Clear and disseminated policies govern access, usage, and maintenance of the library, information resources, and services. The institution ensures that students use these resources as an integral part of their education.

Physical and Technological Resources

The institution has sufficient and appropriate physical resources, including laboratories, network infrastructure, materials, equipment, and buildings and grounds, whether owned or rented; these are designed, maintained, and managed at both on- and off-campus sites to serve institutional needs as defined by its mission and purposes. Classrooms and laboratories, real or virtual, and other facilities are appropriately equipped and adequate in capacity. Proper management, maintenance, and operation of all physical facilities and virtual environments, are accomplished by adequate and competent staffing.

Financial Resources

The institution is financially stable. Ostensible financial stability is not achieved at the expense of educational quality. The institution’s financial resources are sufficient to sustain the achievement of its educational objectives and to further institutional improvement now and in the foreseeable future. The institution reallocates resources as necessary to achieve its purposes and objectives. All or substantially
all of the institution’s revenue is devoted to the support of its educational purposes and programs. The institution has the ability to respond to financial emergencies and unforeseen circumstances.

Public Disclosure
In presenting itself to students and other members of the interested public, the institution provides information that is complete, accurate, and clear.

Integrity
The institution subscribes to, exemplifies, and advocates high ethical standards in the management of its affairs and in all of its dealings with students, faculty, staff, external agencies and organizations, and the general public.
**Policies**

<table>
<thead>
<tr>
<th>General Administration</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Internal Control Objective</strong>: To ensure that overall organizational structure and controls are conducive to accomplishing the mission and objectives of the College.</td>
</tr>
</tbody>
</table>

**Policy:**

1. The College shall have:
   a. A mission statement.
   b. Documented goals and objectives.
   c. Assessed and documented risks that could hinder meeting objectives.
   d. An organizational chart.
   e. Written job description for all employees.
   f. A budgetary, revenue, purchasing, payroll and resource management control system in place with objectives.
   g. A policy and procedures manual.
   h. A reporting system, which adequately focuses on management requirements and provides timely information for both internal and external constituents.

2. The College shall make every effort to achieve segregation of duties among fiscal affairs employees.

3. The internal control documents, which include two (2) manuals (“**Internal Control Plan**” and “**Internal Controls: Fiscal Accounting Policies and Procedures Manual**”), should be read in conjunction with each other. These documents are to be reviewed and updated at a minimum of once per year.

4. All findings as a result of an audit shall be reviewed and corrected by the appropriate College administrator in a timely manner.

5. All instances of unaccounted variances, losses, shortages or thefts of funds or property are to be immediately reported to the State Auditor’s Office as required by Chapter 647 of the Acts of 1989.
# Cash on Hand and in Banks

**Internal Control Objective:** The objective of this policy is to protect cash on hand and in banks of the College and to properly deposit funds into the correct account. This objective should limit the chance of loss for both the Commonwealth and the College. The cash internal control system should reflect the following:

1. Internal controls over cash transactions are adequate.
2. All cash transactions are accurately recorded in a timely manner.
3. Cash batches are mathematically correct and agree with the general ledger accounts.
4. Presentation and disclosure of cash, including restricted funds is adequate.

**Policy:**

The College shall maintain a system that safeguards cash and includes the following:

1. Collection of cash is in a secure designated area of the College.
2. Cash is deposited promptly.
3. All bank transfers are properly authorized.

**Procedures:**

1. All funds are collected in the Business Office. These funds are posted directly to the general ledger (Jenzabar) through the cash receipt entry function. All funds are reconciled daily to a general ledger transaction edit report. Once reconciled, a deposit slip is prepared.
2. All checks received are scanned (using a bank provided scanner) and digitally endorsed “For Deposit Only” with the College bank account name and number. The check batch is reconciled daily to the general ledger transaction edit report. Once reconciled, the batch is sent electronically to the bank over a secured connection.
3. The Business Office accepts MasterCard, Visa, and Discover credit cards. The funds are drawn from the card processing center daily and are wired directly to the College bank account.
4. Deposits are taken to the bank to minimize the risk of loss or theft.
5. A courier service through TD Bank provides weekly bank runs and is available for additional bank runs if necessary.
6. Any funds that are not taken to the bank are placed in the Business Office safe each night to ensure they are secure. Only Business Office staff have keys to the vault and combinations to the safe.
7. All bank transfers are approved by the College Comptroller or his/her designee.
8. Copies of the daily reconciliation report and supporting documentation (including check and credit card information) are secured in a locked file cabinet behind the counter in the Business Office. Original checks are saved until the monthly bank statement is reconciled then they are shredded. Credit card information is stored for the current fiscal year and is shredded when the year-end audit is complete.

9. The College buildings and individual offices are secured by a campus-wide electronic locking system. Only individuals with authorized proximity cards can enter the Business Office during non-peak hours. In the event that a breach is suspected, the system can provide an audit report of who entered the Business Office by date and time.
## Investments

**Internal Control Objective:** To ensure, within the policies stated, that funds available for investment are as fully invested as is practical to meet the College's financial and operational needs.

### Policy:

1. **SAFETY**
   
   Funds are to be invested in the manner that the assets of the College are protected to the greatest extent possible.

2. **AVAILABILITY / LIQUIDITY**
   
   Funds must be invested in the manner that the College will always have sufficient funds available when necessary.

3. **YIELD**
   
   Funds must be invested to obtain a maximum yield only after safety and availability have been fully taken into account.

### Procedures:

1. Excess funds are periodically swept from the operating account and are invested in an interest bearing money market account and CDs.

2. The College's long-term investments are managed by TD Bank Investment Group and are secured by a Letter of Credit from the Federal Home Loan Bank of Pittsburgh.

3. Investments are reconciled monthly to bank statements.

4. Interest earnings are recorded monthly to the General Ledger.
Receipts and Revenue

Internal Control Objective: To ensure that income is properly recognized in the period that services are provided upon receipt of payment or credit adjustment.

Policy:

1. COLLECTION AND DEPOSIT OF FUNDS

   All funds collected shall be promptly deposited in the designated bank accounts and credited to the appropriate College records.

2. PERIODIC RECONCILIATION OF REVENUES COLLECTED

   Periodically (not less than once a month), all amounts received by the College will be reconciled with statements issued by the banks.

3. OVERAGE/SHORTAGE AND NON-CASH CREDIT

   All overages and shortages shall be reviewed on a periodic basis by the Comptroller or his/her designee. Any material differences shall be reported to the Vice President of Finance & Operations. Non-cash credits shall be recorded only upon authorization of the Comptroller or his/her designee.

Procedures:

Student Tuition and Fee Payments

1. Cash, checks, MasterCard, Visa, and Discover are the acceptable methods of payment.

2. Tuition and fee payments are received in the Business Office and are posted directly to the student account through the cash receipt entry function of the Accounts Receivable Module in Jenzabar. The Business Office keeps a receipt of the transaction and issues a receipt to the student.

3. All payments received are reconciled daily to a Jenzabar Transaction Edit Report. Once reconciled a deposit slip is prepared.

4. All cash payments are deposited to the operating account by a bank provided courier service (at a minimum weekly and more often as needed during busy times). As an additional safeguard, a physical “cash receipt” book is maintained, and a carbon receipt is provided to any student paying all or portion of their payment in cash. Checks are scanned and sent to the bank over a secure internet connection daily.

5. Credit card payments can be made over the internet, in person, or over the telephone/fax. Internet payments are made through a third-party service provider (Nelnet). The College does not store any cardholder data in electronic format - this information is maintained by Nelnet. Payments collected by Nelnet are wired directly into the College operating account. The College verifies the Nelnet deposit with the bank and then downloads a file over a secure connection which posts the deposit to the appropriate student accounts in Jenzabar.
Credit card payments made at the College (in person, telephone or fax) are swiped or punched into a standalone dial-up terminal located in the Business Office which is not connected to the internet or College network. The approved payment is posted to the student account in Jenzabar but no credit card information (credit card number or expiration date) is stored. Credit card payments are not made over email or any unsecured form of communication.

The College retains paper copies of the approved payments for the current fiscal year for audit purposes then they are shredded. The fax machine is located behind the counter in the Business Office. Aside from during normal operating hours, only Business Office staff has access to the office via College assigned proximity cards. In the event credit card information becomes compromised the Information Security Officer (ISO) at the College would be promptly notified.

6. All state tuition receipts are wire transferred to the State Treasurer on a regular basis.

**Student Scholarships**

1. Individual scholarships are posted to the general ledger scholarship account in Jenzabar noting the student name. Scholarship funds are brought to the bank through the daily deposit process described above.

2. The Financial Aid Office is notified of all scholarship deposits.

3. Financial Aid will disburse scholarship monies to student accounts through scheduled financial aid disbursement runs.

4. Monies in excess of tuition and fees are refunded to the student by check through the Accounts Payable Module in Jenzabar.

**Federal Grant Funds, Including Financial Aid & Student Loans**

1. The Financial Aid Office informs the Business Office of the scheduled disbursements and determines the amounts to be drawn for each financial aid or federal grant program. Any aid funded by ARRA funds must be segregated and batched for processing separate from all other financial aid disbursements. An award notice must be sent before or concurrent with the disbursement notifying the student of aid funded by ARRA.

2. Federal financial aid, grants and loan funds shall be drawn down based upon scheduled disbursements to occur and checks to be mailed to students within three (3) days.

3. Federal financial aid provided by ARRA funds through the state shall be submitted to the state for reimbursement by providing the disbursement roster to the appropriate MA Comptroller’s office. The MMARS Accountant processes the reimbursements online via MMARS and maintains separate ARRA project files.

4. The Comptroller’s designee processes all other federal drawdowns online.

5. Federal funds are drawn down into the “Federal” bank account. The financial aid funds are posted to the appropriate general ledger accounts in Jenzabar by the Comptroller’s designee and are credited to the appropriate student accounts through the financial aid disbursement process.

6. Monies in excess of tuition and fees are refunded to a student by check through the Accounts Payable Module in Jenzabar.
Receipts and Revenue
(Continued)

Other Receipts and Revenue

Student Activity Fund

1. Student clubs and a minimal number of departments bring miscellaneous funds to the Business Office when collected. The department/student club brings the total deposit with a “revenue turnover form,” which lists out the total amount of funds being deposited by “cash” and “check,” which also includes the signature of a department head/Dean, attesting to the dollar amount being deposited. The Business Office counts the funds, reconciling to the “revenue turnover form”. In the event that a discrepancy exists, the Business Office clerk returns the deposit, and informs the department head/dean of the variance. Assuming that the Business Office personnel are able to reconcile the deposit amount, Business Office personnel accepts the deposit, initials the “revenue turnover form,” makes a copy of the “revenue turnover form” to the depositor, and retains the original for Business Office. The funds are posted directly to the appropriate Club general ledger account in Jenzabar through the cash receipt entry function in the Accounts Receivable Module. Student club funds are brought to the bank through the deposit process described above.

2. Monies collected by clubs/departments after hours or on weekends are deposited in the night deposit box located outside the Nickerson Administration Building College Police Office. The deposit must include a “revenue turnover form,” which will be used for reconciliation. Business Office staff is the only personnel with keys to the night deposit box.

Gifts and Donations

1. All gifts and donations are handled by the Cape Cod Community College Educational Foundation, a legally separate tax-exempt entity.

Bank Reconciliations

1. All bank statements are reconciled monthly by the Procurement/AP Manager and reviewed by the Comptroller or the Assistant Comptroller.

2. Operating account bank reconciliation: This reconciliation involves running four reports created in Infomaker from the general ledger (Jenzabar). One report lists all the credit card activity, one the cash deposits only, one the scanned deposits only and the last report lists any other transactions that were entered into the operating account. These reports are then reconciled to the bank statements, including any outstanding items from the previous month. All cleared checks, deposits and transfers are marked as such and an outstanding list is generated for use the following month.

3. The smaller bank accounts are reconciled by running an account inquiry report from Jenzabar. This report is reconciled to the bank statement. Cleared items are marked as such and an outstanding item list is generated for use the following month.

4. All overages/shortages are reported immediately to the College Comptroller.

5. The Comptroller or the Assistant Comptroller reviews all bank reconciliations in a timely manner.

6. The cash drawer maintained within the Business Office is counted twice daily; once in the morning, by the associate opening the Office, and at the end of the day, by the associate closing the Office. A cash log is maintained and initialed by the individual responsible for counting the cash on each given day. Additionally, on the first day of each calendar month, the Assistant Comptroller reviews the log, and also verifies the amount of cash on hand.
## Billings and Receivables

**Internal Control Objective:** To ensure that all amounts the College anticipates receiving from tuition, fees and other sources are billed and recorded in appropriate accounts in accordance with the State Comptroller and Board of Trustee guidelines

**Policy:**

1. **RECOGNITION OF AMOUNTS DUE TO THE COLLEGE**
   
   All charges for amounts due the College shall be recorded in a timely manner by the Business Office upon the registration of students.

2. **BILLINGS FOR AMOUNTS DUE**
   
   Billings for tuition and fees will be the responsibility of the Business Office. Billings for other amounts due will be the responsibility of the department initiating the charge. That department is responsible for notifying the Business Office of the charge in order for timely input into the financial system (Jenzabar).

**Procedures:**

1. Student course registrations generate the tuition and fee charges in the student system (Jenzabar).

2. Students are notified of their bill in a timely manner (via email, web portal or automated telephone call).

3. All student bills must be paid or receive clearance from the Business Office before the student may attend class. If not, the student's course registrations are canceled for non-payment.

4. Clearance is given for financial aid, Mass Rehab, third party payers, legislative mandated waivers, College approved payment plans and student scholarships that cover the student’s entire bill. Appropriate documentation for all of the above must be on record in the Business Office or Financial Aid Office.

5. Student tuition and fee payments are posted upon receipt directly to the student accounts using the cash receipts entry function in the Accounts Receivable Module of Jenzabar. Payments are allocated to tuition and fees first then to student health insurance.

6. During the first week of classes a student can drop their courses and receive a full refund. After the first week of classes no refunds are given unless the student fills out an appeal form where the student states why they are deserving of a full or partial refund. The appeal is reviewed by a committee who will determine whether the student is eligible for a refund. The student is notified in writing of the committee’s decision.

7. Accounts are reviewed on a periodic basis and delinquent accounts are identified. Dunning letters are sent to the student/responsible party. The College will send up to four dunning letters. If payment has not been received after the fourth letter is sent, the account is turned over to the College’s collection agency and is also sent to the state Intercept Program.
8. Holds are placed on delinquent accounts which prevent students from registering for a subsequent semester, receiving grades, obtaining transcripts, or graduating. Only the Comptroller or his/her designee has the authority to override or remove a Business Office hold.

9. The College will review delinquent student accounts with its independent auditors in conjunction with its annual financial audit to determine accounts to be written-off.
### Purchasing

**Internal Control Objective:** To ensure that the acquisition of goods and services are best suited to the College's requirements at competitive prices.

**Policy:**

1. To obtain sufficient information about the goods and services to be purchased in order to identify qualified vendors.

2. To make reasonable efforts to solicit competitive quotations from vendors as appropriate within the market for particular goods and services.

3. Cost for services performed shall be at the rate set per the “Prevailing Wage Schedule.” The College will use State Contracts for the purchase of goods and services when required.

4. To provide for terms and conditions which are consistent with good business practices.

5. To make use of MHEC, State, and other existing contracts and resources when in the best interest of the College and permissible.

**Procedures:**

1. All purchasing of goods and / or services where the total price is $500 or more is processed utilizing the College’s financial system, Jenzabar. Individual department heads are authorized to order supplies and services directly from vendors without submitting a requisition when the total cost of the purchase is less than $500. All appropriated purchases are processed separately on the statewide MMARS accounting system.

2. Authorized personnel will place orders by filling out a paper requisition. This requisition must be approved by the cost center head and must contain the source and cost center to be charged. Purchases between $2,500 and $9,999 must also be approved by the Department VP and VP of Finance and Operations. Purchases between $10,000 and $24,999 required additional approval by the President and all purchases of $25,000 and above require further approval by the Board of Trustees.

3. If the purchase is for gift cards, either the Comptroller or the Vice President of Finance & Operations must approve prior to the purchase. The IRS considers gift cards a cash equivalent and therefore is not excludable from taxable income.

4. The requisition is sent to the Procurement Office for processing. The Administrative Assistant in the Procurement Office will check for all required information and approvals and, assuming all data is complete, is responsible for creating a Purchase Order (PO), if necessary.

5. Utilizing Jenzabar, the AP personnel ensure that sufficient funds are available in the cost center budget to meet the requested obligation prior to any commitment being made.

6. If sufficient funds are not available, the requisition will be sent back to the requester so a budget transfer can be made.
7. If budgeted funds are available and it is deemed necessary, a PO is produced which is sent to the Vice President Finance & Operations or his/her designee for approval.

8. Once the PO is approved by the Vice President Finance & Operations or his / her designee, the order is placed by the Administrative Assistant in the Procurement Office.

9. The PO copy is faxed, e-mailed or called in to the vendor. Other copies are sent to the Receiving Department and to the Requestor. One copy is kept on file in the Procurement Office by the Administrative Assistant to reconcile to the invoice and packing slip once received.

10. All items ordered by the College must be delivered to Central Receiving.

11. The Receiving Clerk acknowledges the receiving of the package by initialing the packing slip, marking the associated PO when available, and delivers the packing slip and the order to the Requestor, for further confirmation. If a box is marked with Biohazard logo or contains chemical materials for medical departments, the Receiving Clerk does not open the package for a packing slip and delivers the package unopened to the Requestor.

12. The Requestor verifies the order against the PO and packing slip, and confirms working condition and/or appropriateness of the goods received.

13. The vendor invoice is date stamped when received on campus and is approved by the Cost Center Head. Their signature on the invoice, packing slip or email confirmation indicates they received the item(s) or service, and the invoice is ready for processing and payment.

14. The Accounts Payable Accountant matches the approved invoice to the PO when available. The payment is processed and a check is issued.

15. The payment automatically updates both the expenditure and encumbrance files.

16. Prior to disbursement, the payment is reviewed and approved by the Procurement/AP Manager, and the check is electronically signed by the Vice President of Finance & Operations. If the check is for an amount greater than $2,500, the check needs to be reviewed and signed by two authorized signatories, usually the VP of Finance and Operations and the Comptroller or his / her designee.

17. To purchase office supplies:

   Authorized personnel order office supplies on contract by utilizing the online ordering system through WB Mason or Staples. Authorized personnel are allowed to process orders up to $500.00. Orders greater than $500.00 or orders for items not on our contract require authorization from the Procurement Office. Orders for office furniture must be processed through the Procurement Office utilizing the Jenzabar purchasing system described above.

18. Departments contracting with an individual for consulting services or honorariums must have a completed State Standard Contract Form and W-9 on file with the Accounts Payable Office prior to the service begin date. The State Standard Contract Form must be authorized and signed by the Vice President of Finance & Operations or his/her designee.
19. To procure supplies or services that are estimated to cost at least $10,000, but not more than $50,000, written quotes from at least three vendors must be solicited. Items over $10,000 can be exempted from a competitive procurement by the Vice President of Finance & Operations for emergency situations or if the vendor is a sole source provider. The exempted contract is only effective for the period necessary to cure the emergency that would endanger the health or safety of people. A sole source contract may be awarded in an amount of less than $50,000. Contract performance, modifications and cost adjustments are analyzed and approved by the Vice President of Finance & Operations.

20. When employees directly engage in the selection, award, and administration of contracts through the CCCC Procurement Department, they will be provided with a copy of the guidelines regarding procurement conflict of interest and disclosure by the Procurement Officer to review. As soon as an employee engaged in the selection, award, and administration of contracts knows, or foresees, that he or she may have a conflict of interest, in fact or apparent, the MA Disclosure Form regarding the particular matter should be completed with the Vice President of Finance and Operations.

21. The President, the Vice President of Finance and Operations or his/her designee may authorize the use of a College credit card. In all instances the card may be only used for College business. Presently, only the President, the Vice President of Finance and Operations, the Comptroller, the Associate Vice President of Human Resources, the Executive Assistant to the President and the Director of College Communications have the possession of the College credit card.
**Expenditures**

**Internal Control Objective:** To ensure all expenditures are recorded in a timely manner and are adequately documented with the approvals from proper authorities prior to being processed.

**Policy:**

Expenditures will be processed only after:

1. Goods are received and/or services provided, unless payment represents a required deposit, in which case the Vice President of Finance and Operations or the Comptroller approves payment.

2. It is verified that funds are available in the College's Operating Budget and/or accounts to cover payment.

3. It is verified that relative procedures in the Internal Control Sections: Accounts Payable, Purchasing, Receiving and Payroll have been met.

**Procedures:**

1. Goods and services are verified as having been received / provided when the Requestor verifies the order against the packing slip and PO when available. The Accounts Payable Accountant will send the cost center head a copy of the invoice to approve for payment when the invoice is received.

2. In cases when POs are required and created, the Procurement Office matches the PO and invoice checking for accuracy and cost center approvals. Once all documents are present the invoice is ready to be processed for payment.

3. All approved invoices are entered into the Jenzabar Accounts Payable System (for local trust fund & state invoices) and/or MMARS (for state invoices).

4. The Department Security Officer for MMARS & HRCMS is the Director of IT and Client Services, who meets with fiscal management annually or more often if needed (i.e., a change in an employee’s job duties) to review MMARS system security to confirm or to modify departmental and individual user access levels.

5. Expenditures are checked against the budget to verify funds are available.

6. Reimbursements to employees must have appropriate backup and approvals (i.e. receipts, travel authorization form, etc.) for checks to be processed (see Travel Procedures).

7. Checks are prepared by the Accounts Payable Accountant.
   
   a. Bills paid from Trust Funds require the review of the College Comptroller or his/her designee, usually the Procurement/AP Manager, prior to checks being released. Checks issued from trust funds require one signature unless the check is over $2,500, in which case two signatures are required. College signatories are the Vice President of Finance & Operations, the Comptroller and the President.
b. Bills paid from State Funds require the review and approval of either the College Comptroller or the Vice President of Finance & Operations. The State’s Payment Voucher (PV) form is signed by either the Comptroller or the Vice President of Finance & Operations to reflect approval.

8. To ensure prompt and timely payment, all checks, including student refund checks, are mailed by authorized Procurement Office staff.
<table>
<thead>
<tr>
<th>Accounts Payable</th>
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<tbody>
<tr>
<td><strong>Internal Control Objective:</strong> To properly record and maintain all obligations of the College in a timely manner.</td>
</tr>
<tr>
<td><strong>Policy:</strong></td>
</tr>
<tr>
<td>1. The College shall adhere to all laws and regulations of the Commonwealth and the College with regard to the maintenance of accounts payable.</td>
</tr>
<tr>
<td>2. The College will periodically prepare, maintain and update a record of all accounts payable.</td>
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<tr>
<td>3. There will be regular reviews over all outstanding accounts payable to ensure that they are accurate and valid.</td>
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<tr>
<td>4. Payments shall be processed in a timely manner.</td>
</tr>
<tr>
<td><strong>Procedures:</strong></td>
</tr>
<tr>
<td>1. Once goods or services are received/provided, the amount due becomes an accounts payable.</td>
</tr>
<tr>
<td>2. All POs issued for goods and services are maintained in the College’s purchasing system (Jenzabar) as an encumbrance which becomes an accounts payable in Jenzabar once the goods/services are received.</td>
</tr>
<tr>
<td>3. A periodic review of all outstanding POs and encumbrances will be conducted to determine if they are still valid and outstanding.</td>
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<tr>
<td>4. Questionable POs are researched.</td>
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<tr>
<td>5. POs that are no longer valid are voided and the funds are unencumbered.</td>
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<tr>
<td>6. POs that are paid are unencumbered and the expense is posted to the cost center budget.</td>
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<tr>
<td>7. All accounts payables are processed in a timely manner according to vendor terms taking advantage of any discounts available.</td>
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<td>8. For payments made through MMARS, the invoice date, which is stamped on the invoice when it arrives on property, is entered and the system automatically calculates the payment date based on the object code.</td>
</tr>
<tr>
<td>9. A reconciliation of the individual subsidiary accounts payable ledgers to the general ledger will be performed periodically.</td>
</tr>
<tr>
<td>10. Vendor requests for changes to remit addresses or bank routing/account numbers must be made on letterhead with an explanation for the change and a “wet” signature. The vendor must also provide a new W-9 form, with a “wet” signature.</td>
</tr>
<tr>
<td>11. Accounts Payable Manager will check all new state vendors against the State Vendor Debarment List and periodically review to ensure current vendors are also not on the list. The Accounts Payable Manager will work with Grants Management to check the Federal Debarment list to ensure vendors to be paid with Federal funds are not on the list.</td>
</tr>
</tbody>
</table>
**Payroll**

**Risks:** Poor controls over payroll could lead to overstatement/understatement of gross pay and deductions in addition to fraud and abuse if not properly detected.

**Internal Control Objective:** To prepare the payroll accurately and completely so as to ensure every employee receives the proper gross pay, on time, with the proper deductions.

**Policy:**

The payroll internal control system should reflect the following:

1. All paperwork and the approval process for hiring all employees must be complete and on file before the employee can start work and be compensated.
2. Employees shall only be compensated for actual time worked or for previously earned/unused leave.
3. There will be a segregation of duties between preparing the payroll and issuing checks.
4. All payroll processed shall be in compliance with all Internal Revenue Service and Massachusetts Department of Revenue laws and regulations.
5. All additions or changes to a payroll must have proper authorization before the payroll can be processed.

**Procedures:**

*The HRCMS State Payroll System*

1. All full-time employees excluding faculty, submit time using MassHR Self Service Time and Attendance.
2. The Payroll Specialist receives time sheets for standby pay, detail pay, overtime and call back pay. The sheets are authorized by the appropriate Department Head. The Payroll Specialist posts time information to the employee’s records in HRCMS.
3. The Human Resources Personnel Analyst receives Faculty attendance sheets from department supervisors and posts time and attendance information in HRCMS: sick leave and personal days.
4. Designated supervisors review and approve all full-time employee timesheets via MassHR Self Service Time and Attendance. Supervisors approve overtime hours, vacation and sick leave, comp time used, and personal days.
5. The Self Service Time and Attendance automatically calculates overtime pay, shift differential, and weekend differential pay, and updates all leave accrual balances.
6. The Payroll Specialist enters information into the State HRCMS System for direct deposit and federal and state withholding changes for affected employees.
7. A check with the Human Resources Office for any last minute changes, additions, and/or deletions, relating to step increases, new employees or employees who are being terminated is conducted.

8. The Payroll Department uses the State’s Best Practice procedures and runs all Self Service Time and Attendance reports to verify the accuracy of payroll before the payroll closing date.

9. The Payroll Staff Assistant collects part-time hourly paid time sheets from department supervisors.

10. The Payroll Staff Assistant receives work study time sheets from the department supervisors and enters approved information into HRCMS for payment.

11. The Payroll Specialist contacts the employee and/or department supervisors for resolution of any discrepancies.

12. The Payroll Specialist checks with the Human Resources Office for any changes, additions or deletions relating to salary, hourly rates, new hires and terminations for part-time employees.

13. The Payroll Specialist calculates the regular hours worked for each part-time employee and inputs the information into HRCMS.

14. The Payroll Specialist checks totals on the College's preliminary payroll with the totals in the HRCMS System before the payroll closing date to verify employee counts and gross payroll amounts by appropriation account.

15. The Payroll Specialist downloads the LCM report from HRCMS to include all gross wages charged to AA, BB and CC object codes by State Appropriation.

16. The LCM report is then fed into the Jenzabar finance system. The feed applies all appropriate fringe rates to applicable object codes.

17. All pay advices are electronic via PayInfo System. All employees (99%) are paid via direct deposit.

18. On a monthly basis, the Payroll Specialist verifies the State of Verification Report from the Group Insurance Commission and the Associate Vice President of Human Resources authorizes it.

19. The Payroll Specialist assists Human Resources in preparing and submitting any required Payroll Reports to the Department of Higher Education on gross payroll and FTE totals.

20. The Payroll Specialist reviews all HRCMS Reports received relative to deductions (union dues, TSA's, etc.).

21. The Payroll Specialist meets with, explains and resolves any problems or questions from employees during the month.

22. The Payroll Specialist calls the State Treasurer's and State Comptroller's Offices with any problems or questions related to the HRCMS payroll system.

23. The Payroll Specialist responds to any inquiries from the State Treasurer, State Comptroller, Group Insurance Commission and Retirement Board.
Inventory Control: Equipment & Fixed Assets

**Internal Control Objective:** To ensure that all equipment, fixed assets, and surplus/obsolete property of the College are properly safeguarded, accounted for, and when appropriate, disposed of.

**Policy:**

The College shall maintain an inventory system which includes:

1. **Affixing a College Inventory Tag with a unique ID number:**
   
   a. To any College owned or leased item that has a cost of **$1,000 - $49,999.99** (non-GAAP).
   
   b. To any College owned or leased item deemed to be easily movable that has a unit cost of **$50,000.00 or more** (GAAP).

2. **Maintaining the inventory listing on the appropriate computerized inventory system:**
   
   a. All College owned non-GAAP assets and GAAP assets deemed easily movable are listed in the inventory database.

3. **Designating employees to perform / oversee the annual inventory processes:**
   
   a. An employee from the Facilities Department has been designated as the Physical Inventory Control Coordinator.
   
   b. The Inventory Control Coordinator works with a designated contact from each department to track assets and complete the Inventory Information Form documenting that status of the assets.
   
   c. The Comptroller has been designated as the Obsolete / Surplus Property Officer to facilitate the identification and disposal of surplus or obsolete property.

**Procedures:**

**College Owned or Leased Items**

All Main Campus and Hyannis Campus orders are delivered to the Central Receiving / Shipping area. Programs located at Plymouth and Bridgewater State University also receive items directly at their respective locations.

1. Prior to delivery, the Inventory Control Coordinator and Storekeeper receive a copy of the purchase order from the Business Office. For all purchases that need to be inventoried, the Inventory Control Coordinator and the Storekeeper flag the purchase order pending arrival of the item(s).

2. Upon delivery, the Storekeeper reviews all receivables and logs them with the appropriate purchase order number in the log book to confirm the acquisition date.

4. Once received, a Central Receiving staff member delivers the item(s) to the department that placed the order.

5. The Inventory Control Coordinator contacts the designated person in the Department making the order to schedule a time to affix the unique CCCC inventory tag number on the asset and complete the Inventory Information Form.
6. The Inventory Control Coordinator then enters the inventory information into the inventory database using the following parameters:

- At a minimum, the inventory record for each item will contain: the CCCC Inventory Tag Number, description, purchase date, unit cost, physical location (building and room), and disposition data.
- For items purchased with Federal grant funds, each inventory record will also contain: acquisition date, source of the funding, title holder, serial number or identification number, grant award number, percentage of Federal participation in project costs associated with the item, condition of item, and item use.
- If the item has a cost of $50,000 or more, the asset’s cost is entered by the Comptroller or his/her designee, into the Jenzabar fixed asset system and depreciation expense is calculated and posted to the general ledger.

Physical Inventory

1. Annually, the Inventory Control Coordinator will coordinate a physical inventory of assets with the assistance of a designee from each College department. The physical inventory is reconciled to the inventory database system by the end of each fiscal year.

2. Any corrections or changes are entered into the system and documented.

3. Any items that are moved are documented and the respective inventory system is updated as to the asset’s new physical location (noting the new room number and building name).

Obsolete/Surplus Equipment

1. The College Obsolete / Surplus Property Officer reports, in writing, all obsolete / surplus property on campus to the State Surplus Property Officer (SSPO). The report describes the property as well as its age and condition.

2. No property may be transferred or otherwise disposed of without the prior, written approval from the SSPO.

3. Until the property has been disposed of in accordance with the approval of the SSPO, the College is responsible for its security and shall be held accountable for the property.

4. When the property is properly disposed of the inventory system is updated accordingly.
**Internal Control Objective:** To ensure financial aid funds are available, safeguarded and disbursed in the best interests of the students, providers of funds and the College.

**Policy:**

1. The College shall adhere to all federal, state, trustee and donor guidelines and regulations regarding the acquisition, disbursement and record keeping of financial aid funds.

2. There shall be a separation of duties between the office awarding financial aid funds and the office disbursing financial aid funds.

**Procedures:**

1. The College maintains eligibility for all federal and state financial aid programs it participates in. Annually, the College applies to the U.S. Department of Education for federal financial aid allocations in the SEOG and Work Study Programs. The Financial Aid Director is responsible for maintaining the Federal Student Aid Program Participation Agreement (PPA) and submitting the annual FISAP.

2. Students attending the College who request financial aid must complete and file a Free Application for Federal Student Aid each year (FAFSA).

3. The student receives their FAFSA approval/denial notification by mail or e-mail. The College’s Financial Aid Office receives the student information electronically from the Federal Processing Center.

4. Once the FAFSA has been processed and approved the Financial Aid Office packages the student's financial aid based on the student's financial need, family contribution, course enrollments, available funding, etc.

5. The College Financial Aid Office issues an Award Letter to the student.

6. The Financial Aid Office enters the student's award information into the College's Financial Aid System (PowerFaids).

7. At the end of the College’s refund period, the Financial Aid Office certifies student attendance and credit load status, and adjusts student awards, if necessary, in PowerFaids.

8. The Business Office views the student's financial aid awards in the Accounts Receivable Module (Jenzabar) via the interface with PowerFaids.

9. The Financial Aid Office transmits a disbursement file from PowerFaids into the Jenzabar Accounts Receivable module. The Business Office then verifies tuition and fee charges, book charges and other miscellaneous charges owed by the student.

10. The Business Office posts the disbursement batch generated by the Financial Aid Office and works with the Financial Aid Office to ensure that authorizations for payment of miscellaneous charges (books, insurance, etc.) by financial aid funds are on file. Where appropriate the Business Office issues checks to the students for amounts above the student charges after financial aid has covered the entire bill. Checks go through the internal control procedures in the Expenditure section.
11. The Business Office mails credit balance checks to students no later than fourteen (14) days after disbursing the funds to the student’s accounts.

12. Federal financial aid funds are drawn down online in accordance with existing procedures (See Receipts and Revenue Section).

13. The Financial Aid Office and Business Office reconcile federal accounts on a monthly basis.

Grants Management

**Internal Control Objective:** To ensure all federal, state, local and/or private grants are properly and accurately accounted for.

**Policy:**

1. Applications for grant funds should follow established internal review and approval procedures.
2. Grant terms, restrictions and regulations should be adhered to at all times.
3. For each grant an individual shall be designated who will be responsible for coordinating all aspects of the Grant in the best interest of both the funding agency and the College (Grant Coordinator or designee).
4. The Grant Coordinator or designee will be responsible for monitoring, managing and preparing reports for the Grant. The Grant Coordinator or designee will work in concert with the Procurement Office for all fiscal activities of the grant and will work in concert with the Grants Office for programmatic and non-financial documentation.
5. Grant fiscal activity will follow existing College policies and procedures and be recorded in accordance with applicable federal, state and local accounting practices and principles.
6. The Grant Coordinator or designee will ensure all required reporting of grant activity will be done in a timely manner.

**Procedures:**

*Pre-Award Process*

1. A Statement of Intent is prepared by interested College faculty/professional staff and submitted to the Grants Office for review. The Grants Office works with faculty and staff to develop a draft proposal and budget, and to ensure the proposal is consistent with CCCC’s mission, strategic plan and fundraising priorities.
2. The draft proposal is submitted by the Grants Office to the appropriate Division Dean or Vice President for revision and update, as needed. The Vice Presidents will determine if the grant proposal should proceed.
3. The grant budget is reviewed by the Vice President Finance & Operations or designee to ensure it is accurate and appropriate.
4. The grant proposal is finalized and circulated for approval from relevant senior management staff and Grants Director.
5. The final approved grant proposal is submitted to the outside funding agency by the Grants Office under the appropriate administrator signature.
Acceptance of Award

1. The College is notified of the approval for funding of the grant proposal from the funding agency.

2. The College completes required documents supplied by the funding agency to officially accept the award under the appropriate administrator signature.

Post Award Process: Grant Management

1. A Grant Coordinator is identified as the overall point of contact for the grant. He/she is responsible for monitoring the grant's progress and for filing all required reports in a timely manner. He/she is also responsible for notifying the Grants Office and the Business Office of any notable deviations in the grant progress or expenditures.

2. At the start of the grant, a kick-off meeting will take place with the Grants Office, Grants Accountant, and Grant Coordinator or designee to review the grant agreement, budget, and reporting requirements.

3. The Business Office assigns each Grant its own source, cost center and project codes in the General Ledger (Jenzabar). The Grants Accountant will produce a budget variance report and G/L transaction report for each grant at least quarterly and distribute to each Grant Coordinator or designee. The Grant Accountant will request funds and file financial reports in accordance with the funder requirements.

4. The Grant Coordinator or designee will work with the Grants Office and the Business Office to ensure that the grant closeout activities comply with the funder requirements and College policies and procedures.

5. The Grants Office and Business Office are responsible for properly preparing and retaining records that may be needed in the event of an audit.
Financial Reports

**Internal Control Objective:** To ensure that all financial reports are filed accurately and timely to the respective federal or state agencies, designated College administrators and local Board of Trustees.

**Policy:**

The College shall designate those employees responsible for preparing and submitting all financial reports. The designated employees shall submit reports including but not limited to the following:

1. **Board of Trustees**
   a. At least Quarterly Trust Fund Reports of Expenditures
   b. Annual Projected Trust Fund Budget Reports
   c. Financial Fiscal Year Receipt and Expenditure Report for Trust Funds
   d. Independently Audited Financial Statements

2. **Department of Higher Education**
   a. Independently Audited Financial Statements
   b. Budget Formula Worksheets
   c. Capital Adaptation & Renewal Worksheets
   d. IPEDS Annual Report

3. **Federal Government**
   a. FISAP Annual Report
   b. Grant Reports as required

4. **State Government**
   a. Annual GAAP Report to the State Comptroller
   b. Independently Audited Financial Statements to State Comptroller and State Auditor’s Office.
   c. Grant Reports as required

5. **College Administrators**
   a. At least Quarterly Cost Center Budget Variance Reports.

**Procedures:**

1. The Vice President Finance & Operations and the Comptroller are the designated employees responsible for preparing and issuing all financial reports for internal/external purposes with the exception of the FISAP, which is the responsibility of the Financial Aid Director, and IPEDS, which is the responsibility of the Director of Institutional Research and Planning.

2. All required financial reports will be prepared in a timely manner in order to meet deadlines.
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<td><strong>Financial Reports</strong>&lt;br&gt;(Continued)</td>
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<tr>
<td>3.  All adjusting entries posted to the General Ledger are reviewed and approved by the Comptroller.</td>
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<tr>
<td>4.  The Cost Center Budget Variance Reports are available online to all Budget Managers or authorized designees using the CampusWeb budget portal.</td>
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<tr>
<td>5.  All required federal and state grant reports will be filed in accordance with the grant guidelines.</td>
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</table>
**Internal Control Objective:** To ensure that personnel records are properly safeguarded and maintained and the confidentiality of those records are protected to the greatest extent allowed by law. To ensure that employees are made aware of and have the opportunity to receive all employee benefits to which they are entitled.

**Policy:**

1. The College shall adhere to existing collective bargaining agreements and all federal, state and trustee guidelines and regulations regarding sound personnel administration.

2. Aside from Human Resources Staff, access to employee personnel files shall be available only to the employee, for College business purposes, and/or to those members of the College staff who have supervisory responsibility over the employee.

3. The Human Resource Department shall maintain a log documenting all access to employee personnel files.

4. Employment advertisement for personnel shall comply with the Affirmative Action Plan as approved by the Board of Trustees.

5. The Human Resource Department shall distribute the state ethics policy on an annual basis to all employees, and to all new employees at the point of hire.

**Procedures:**

1. All job vacancies are posted internally and externally as appropriate, in accordance with applicable collective bargaining agreements, and federal and state statutes, with a deadline for application. Vacancies are advertised in outside publications, locally and nationally depending on the nature of the vacancy.

2. The College uses an online application software – Interview Exchange – for all applicants. Applicants wishing to apply for a position must complete the online qualifications questionnaire, and upload their cover letter and resume.

3. If the job vacancy is for a faculty or professional position, a Search Committee is formed with every attempt to represent the various employment classifications and diversity at the College.

4. After the job vacancy deadline has passed, the appropriate hiring manager, search committee members (if applicable) and Associate Vice President of Human Resources review the applications/resumes and select candidates for interviews based on the qualifications, credentials and experience listed on their applications/resumes.

5. The selection is reviewed with the Associate Vice President, Human Resources and Affirmative Action Officer to ensure compliance with all Federal AA/EEO regulations.

6. The Human Resource Department schedules interviews with the selected candidates and hiring manager/search committee members.
7. The hiring manager/search committee members recommend the most qualified candidates to the area Dean, area Vice President and Associate Vice President of Human Resources and Affirmative Action Officer who determine the finalist to offer the position to. The President is the final hiring authority.

8. Once hired, the employee participates in an orientation session with the Human Resources Department where College/State rules, regulations, benefits, etc. are explained and the employee fills out appropriate employment paperwork (I-9, W4, etc.).

9. The Associate Vice President of Human Resources or her/his designee conducts exit interviews with employees separating from service with the College for review benefits. HR communicates with the Information Technology Department to revoke email access and systems access of terminating employees.

10. The Human Resources Department reviews all policies and procedures.

11. The Human Resources Department meets with union representative on all employee related issues.

12. The Human Resources Department is responsible for overseeing the evaluation process for employees.
## Records Retention

**Internal Control Objective:** To ensure that records are properly safeguarded, maintained and/or disposed of in accordance with all existing State and Federal regulations.

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<th>Policy:</th>
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<tr>
<td>1. To adhere to the current records retention schedule and regulations as issued by the Records Retention Board.</td>
</tr>
<tr>
<td>2. To transfer those records, designated for permanent retention by the State Comptroller's Office, to the Records Conservation Board on a schedule provided to the College.</td>
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<th>Procedures:</th>
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<tbody>
<tr>
<td>1. At the close of each fiscal year, the Business Office files and stores all financial records in a secure dry location. Documentation pertaining to credit card payments is destroyed upon completion of the fiscal year-end audit and are not placed in storage.</td>
</tr>
<tr>
<td>2. The storage boxes are labeled as to their contents and fiscal year. The files are organized in the storage boxes in accordance with the State Comptroller's filing procedures.</td>
</tr>
<tr>
<td>3. Periodically permission to destroy certain records is requested from the Records Conservation Board in accordance with State regulations.</td>
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<tr>
<td>4. Records approved for destruction are destroyed and discarded as necessary.</td>
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## Receiving

**Internal Control Objective:** The receiving operation acts to ensure that goods are received by the College as ordered, in proper condition, and are delivered to the appropriate parties/locations in an expeditious manner.

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<th>Policy:</th>
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<tbody>
<tr>
<td>1. All goods ordered by the College will be received under the supervision of the Central Receiving Staff who will have been provided with prior notification of the expected delivery from the Procurement Office via a copy of the College Purchase Order.</td>
</tr>
<tr>
<td>2. All received goods shall be delivered to the College departments in a timely manner.</td>
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<th>Procedures:</th>
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<tbody>
<tr>
<td>1. All goods delivered to the Main Campus are received at the central receiving area. Items delivered to the CCCC programs housed at Bridgewater State University and Plymouth are delivered to the program offices at those locations.</td>
</tr>
<tr>
<td>2. Goods are inspected as to condition and are matched against Central Receiving's copy of the College Purchase Order for completeness for item delivered to the Main Campus; designated program personnel are designated to complete this review at the Bridgewater State University and Plymouth locations.</td>
</tr>
<tr>
<td>3. All damaged goods are refused and returned to the vendor.</td>
</tr>
<tr>
<td>4. The Procurement Office is notified of all returns to ensure our account is properly credited by the vendor.</td>
</tr>
<tr>
<td>5. The Central Receiving staff member and signs for accepted goods for deliveries to the Main Campus; designated program personnel sign for accepted goods at Bridgewater State University and Plymouth locations.</td>
</tr>
<tr>
<td>6. Assets are not allowed to be delivered until they are tagged for inventory control by our Asset Inventory Administrator, who is also copied on the purchase order and has access to the shipping / receiving email.</td>
</tr>
<tr>
<td>7. Goods are delivered to the College department that placed the order.</td>
</tr>
<tr>
<td>8. The packing slip or invoice is signed by Receiving, to indicate that Receiving has accepted a total number of boxes coinciding with that which is on the packing slip. Receiving does not inspect merchandise or confirm its working order; this responsibility falls with the ordering Department Head. Along with the goods, the packing slip is submitted to the Department Head as verification that the goods were received/accepted and payment can be made, assuming the Department Head finds the good to be in working order.</td>
</tr>
</tbody>
</table>
### Digital Information Processing

**Internal Control Objective:** Digital information processing systems will accurately process and report on the operations of the College in a secure manner.

**Policy:**

1. All systems will secure and protect digital information against unauthorized access, destruction, use, modification, disclosure or loss. This includes all security related to Personally Identifiable Information.

2. All systems will provide access to and disseminate digital information only to those persons and entities that reasonably require the information to perform their duties.

3. The College will educate its employees about information security on a regular basis.

4. The College will encourage a culture that supports employees reporting suspected security vulnerabilities or breaches.

**Procedures:**

1. The Chief Information and Technology Officer (CITO) has overall responsibility for all digital information services at the College.

2. The CITO creates accounts for, and requires complex passwords of, employees of the College under the CCCC Network and Email Account Policy. Access to specific systems is based on a layered defense strategy that includes physical access controls and multiple access permission layers.

3. All staff shall receive information security training. Future employees shall receive such training as part of the standardized orientation provided by Human Resources at the time they commence work, and from their Department Head.

4. All staff who know, or have reason to know, that a breach of security has occurred are required to notify the Information Security Officer (ISO).
### Budgeting

**Internal Control Objective:** To ensure that revenue and expenditures are carefully budgeted and periodically reviewed on an on-going basis in keeping with the fundamentals of sound financial management.

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<tr>
<td>1. All projected revenues and expenditures of the College will follow a budget process.</td>
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<tr>
<td>2. Annual budgets and when appropriate budgetary adjustments and modifications must be submitted to the College's Board of Trustees for approval.</td>
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<tr>
<td>3. Departmental and College-wide budgets shall be reviewed periodically to ensure that actual revenues and expenditures are in line with projections.</td>
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<tr>
<td>4. Budget variance reports are available to all budget managers and designees using the online CampusWeb budget portal.</td>
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<tr>
<td>5. All budgetary activities shall be in keeping with state, College and other applicable rules and regulations.</td>
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<th>Procedures:</th>
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<tbody>
<tr>
<td>1. The College employs a very detailed Cost Center Budget process for all departments.</td>
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<tr>
<td>2. The Vice President of Finance &amp; Operations approves all cost center budgets and develops the overall annual operating budget for the College based on budget proposals submitted by each budget manager.</td>
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<tr>
<td>3. The annual operating budget is approved by the Board of Trustees.</td>
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<tr>
<td>4. The operating budget is entered into the CampusWeb online budget portal by each cost center manager or by the Comptroller.</td>
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<tr>
<td>5. All budget adjustments are approved by the Vice President of Finance &amp; Operations and if material by the Board of Trustees.</td>
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<tr>
<td>6. Once approved, budget adjustments are entered into CampusWeb by the Vice President of Finance &amp; Operations, the Comptroller or his/her designee.</td>
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<tr>
<td>7. Active budgets can be viewed by budget managers and designees using the online CampusWeb budget portal.</td>
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G. INFORMATION AND COMMUNICATION

Definition

The information and communication guideline involves the identification and dissemination of pertinent information in forms and timeframes that enable students, faculty, and staff to carry out their responsibilities. Communication occurs in all directions, flowing down, across, and up the organization.

Overall Objective

Information is current, accurate, appropriate in content, and made available on a timely basis at all levels to permit management to achieve its objectives.

Specific Objectives

1. Accounts are maintained to ensure observance and enforce limitations placed on the use of available resources.

2. Adequate source documentation exists to support amounts and items reported.

3. Assigned authorization levels and approvals exist for posting transactions to the general ledger.

4. A recordkeeping system is established to ensure that accounting records and documentation are retained for the time period required in accordance with the provisions of laws, regulations, contracts, and grant agreements.

5. Procedures exist to ensure that reports are provided on a timely basis to managers for review and appropriate action.

6. Procedures exist for review and reconciliation of control accounts in the general ledger to subsidiary ledgers.

7. Computer and program controls exist and include the following:
   a. Data entry controls (i.e., edit checks)
   b. Exception reporting
   c. Access controls
   d. Reviews of input and output data
   e. General controls and security controls

8. Operating policies and procedures are clearly written and communicated.

9. Staff meetings are regularly scheduled.

10. The Board of Trustees conducts regular meetings where financial information is reviewed and the results of program activities and accomplishments are discussed. Written documentation is maintained of matters addressed at such meetings.
11. The Board of Trustees has established an Audit Committee or equivalent that is responsible for engaging the auditor and ensuring that audit findings and recommendations are adequately addressed.

H. MONITORING

Definition
Monitoring the effectiveness of components includes ongoing activities and/or separate evaluations. Modifications are made as necessary.

Overall Objective
Ongoing monitoring occurs in the ordinary course of operations, including regular management and supervisory activities. In addition, staff take other actions in performing their duties to assess the quality of the internal control system.

Specific Objectives
1. Management obtains evidence that the internal control system continues to function through independent reconciliations and management review of reports.

2. Communications from external parties corroborate internally generated information or indicate problems.

3. Appropriate organizational structure and supervisory activities provide oversight of control functions and identification of deficiencies.

4. Physical assets are examined periodically and compared to data recorded by information systems.

5. Irregularities and deficiencies, once identified, are promptly and effectively corrected.

6. The Board of Trustees reviews and monitors audit findings and assesses the adequacy of corrective action plans.
SECTION 3 - APPENDICES

Appendix 1 – Chapter 647

Commonwealth of Massachusetts
Office of the State Comptroller:

Internal Control Legislation

Chapter 647 of the Acts of 1989

Chapter 647  THE COMMONWEALTH OF MASSACHUSETTS

In the Year One Thousand Nine Hundred and Eighty-nine

AN ACT RELATIVE TO IMPROVING THE INTERNAL CONTROLS WITHIN STATE AGENCIES.

Be it enacted by the Senate and House of Representatives in General Court assembled, and by the authority of the same, as follows:

Notwithstanding any general or special law to the contrary, the following internal control standards shall define the minimum level of quality acceptable for internal control systems in operation throughout the various state agencies and departments and shall constitute the criteria against which such internal control systems will be evaluated. Internal control systems for the various state agencies and departments of the commonwealth shall be developed in accordance with internal control guidelines established by the office of the comptroller.

(A) Internal control systems of the agency are to be clearly documented and readily available for examination. Objectives for each of these standards are to be identified or developed for each agency activity and are to be logical; applicable and complete. Documentation of the agency's internal control systems should include (1) internal control procedures, (2) internal control accountability systems and (3), identification of the operating cycles. Documentation of the agency's internal control systems should appear in management directives, administrative policy, and accounting policies, procedures and manuals.

(B) All transactions and other significant events are to be promptly recorded, clearly documented and properly classified. Documentation of a transaction or event should include the entire process or life cycle of the transaction or event, including (1) the initiation or authorization of the transaction or event, (2) all aspects of the transaction while in process and (3), the final classification in summary records.

(C) Transactions and other significant events are to be authorized and executed only by persons acting within the scope of their authority. Authorizations should be clearly communicated to managers and
employees and should include the specific conditions and terms under which authorizations are to be made.

(D) Key duties and responsibilities including (1) authorizing, approving, and recording transactions, (2) issuing and receiving assets, (3) making payments and (4), reviewing or auditing transactions, should be assigned systematically to a number of individuals to insure that effective checks and balances exist.

(E) Qualified and continuous supervision is to be provided to ensure that internal control objectives are achieved. The duties of the supervisor in carrying out this responsibility shall include (1) clearly communicating the duties, responsibilities and accountabilities assigned to each staff member, (2) systematically reviewing each member's work to the extent necessary and (3), approving work at critical points to ensure that work flows as intended.

(F) Access to resources and records is to be limited to authorized individuals as determined by the agency head. Restrictions on access to resources will depend upon the vulnerability of the resource and the perceived risk of loss, both of which shall be periodically assessed. The agency head shall be responsible for maintaining accountability for the custody and use of resources and shall assign qualified individuals for that purpose. Periodic comparison shall be made between the resources and the recorded accountability of the resources to reduce the risk of unauthorized use or loss and protect against waste and wrongful acts. The vulnerability and value of the agency resources shall determine the frequency of this comparison.

Within each agency there shall be an official, equivalent in title or rank to an assistant or deputy to the department head, whose responsibility, in addition to his regularly assigned duties, shall be to ensure that the agency has written documentation of its internal accounting and administrative control system on file. Said official shall, annually, or more often as conditions warrant, evaluate the effectiveness of the agency's internal control system and establish and implement changes necessary to ensure the continued integrity of the system. Said official shall in the performance of his duties ensure that: (1) the documentation of all internal control systems is readily available for examination by the comptroller, the secretary of administration and finance and the state auditor, (2) the results of audits and recommendations to improve departmental internal controls are promptly evaluated by the agency management, (3) timely and appropriate corrective actions are effected by the agency management in response to an audit, and (4) all actions determined by the agency management as necessary to correct or otherwise resolve matters will be addressed by the agency in their budgetary request to the general court.

All unaccounted for variances, losses, shortages or thefts of funds or property shall be immediately reported to the state auditor's office, who shall review the matter to determine the amount involved which shall be reported to appropriate management and law enforcement officials. Said auditor shall also determine the internal control weakness that contributed to or caused the condition. Said auditor shall then make recommendations to the agency official overseeing the internal control system and other appropriate management officials. The recommendations of said auditor shall address the correction of the conditions found and the necessary internal control policies and procedures that must be modified. The agency oversight official and the appropriate management officials shall immediately implement policies and procedures necessary to prevent a recurrence of the problems identified.

House of Representatives, December 21, 1989
Passed to be enacted, George Keverian, Speaker
In Senate, December 22, 1989.
Passed to be enacted, William M. Bulger, President
Approved,
Michael Dukakis, Governor.
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Chapter 647 - Responsibilities under the Internal Control Law

Department managers need to ensure continued adherence to the requirements of Chapter 647 of the Acts of 1989. Chapter 647 establishes internal control standards that define the minimum level of quality acceptable for internal control systems in operation throughout the various state agencies and departments and constitute the criteria against which such internal control systems will be evaluated. Internal control systems must, of course, include all aspects of a department's business - programmatic operations as well as financial.

Management's specific responsibility under the law is to ensure that the standards in the act are met. These standards require, among other things that management ensure that documentation of the internal control system be readily available, transactions and events are promptly recorded, there exists qualified and continuous supervision, and that access to assets and resources is restricted. For these and the other standards set forth in the law management must send a clear message to all personnel that the control environment - its philosophy for accomplishing its goals and objectives - will encompass personal integrity, ethics, and competence.

In fulfilling the law's requirements to establish controls, management must first establish the agency's goals and objectives and identify risks associated with those goals and objectives. Objectives are to be logical, applicable, and complete. The agency head will be directly responsible for all the activities of the agency. Managers of course will be responsible for establishing internal control for their respective units. These internal controls, and the goals and objectives of the unit, must be consistent with the overall goals and objectives of the agency and mirror the tone and expectations of the agency head.

A good system of controls begins at the highest level of the organization and assists management in meeting objectives without avoiding serious problems. The agency head is responsible for all of the agency's activities and thus sets expectations for meeting the agency's goals and objectives for all financial and programmatic activities. The tone management sets through its policies, actions and expectations is important to the overall acceptance of the system by agency personnel and functioning of the operations. In accomplishing this outcome, the law requires the designation of a high-level individual to oversee the internal control system, evaluate its effectiveness, and ensure its integrity.

This individual must be able to ensure that changes necessary to ensure the continued integrity of the system are implemented and that documentation of all internal control systems is readily available for examination. The individual must also be able to see that audit results and recommendations are promptly evaluated, timely appropriate corrective action to an audit is effected, and management's actions to address audit matters will be addressed in the budget. To accomplish these requirements, the agency head must ensure that the individual is at sufficient hierarchy to fulfill them.

On a final note, management must immediately report all unaccounted for variances, losses, shortages, or thefts of funds or property to the Office of the State Auditor. The OSA, in addition to other duties under the law, will review the matter and determine amounts involved, internal control weaknesses, and report any amounts to appropriate management and law enforcement officials.

Massachusetts State Auditor Chapter 647 Form

Appendix 2 – Report on Unaccounted for Variances, Losses, Shortages, or Thefts

Commonwealth of Massachusetts
Office of the State Comptroller:

Internal Control Legislation

Chapter 647 of the Acts of 1989 - Report on Unaccounted for Variances, Losses, Shortages, or Thefts of Funds or Property

TO: Agency Heads

FROM: Robert A. Powilatis, Deputy for Auditor and Investigative Services

DATE: January 18, 1996

RE: LawRelativeToImprovingtheInternalControlsWithinStateAgencies

Chapter 647 of the Acts of 1989 was passed on January 3, 1990 and became effective on April 3, 1990. The law establishes the minimum level of quality acceptable for internal control systems for state agencies of the Commonwealth. Internal control systems for state agencies should be developed in accordance with internal control guidelines established by the Office of the State Comptroller. We will review compliance with the law during our audit engagements.

This law also requires that all unaccounted for variances, losses, shortages or thefts of funds or property be immediately reported to the Office of the State Auditor (OSA). The OSA is required to determine the amount involved and the internal control weaknesses that contributed to or caused the condition, make recommendations for corrective action, and make referrals to appropriate law enforcement officials. In order to comply with this law, we are requesting that all unaccounted for variances, losses, shortages or theft of funds or property be reported immediately to the OSA on the attached form.

Should you have any questions or desire additional information, please contact Howard Olsher, Director of State Audits at (617) 727-6200 (x25).

Attachment
Report on Unaccounted for Variances, Losses, Shortages or Thefts of Funds or Property as Required by Chapter 647 of the Acts of 1989

- Under Chapter 647 of the Acts of 1989, employees/representatives of state agencies must immediately report to the State Auditor's Office any unaccounted for variances, losses, shortages or thefts of funds or property that have occurred.

- Please provide the following information, which will serve as your filed report. Explain, in detail, the incident and the cause of said incident. Complete every field applicable. Do not abbreviate. In the case of loss or theft of state property, if the value is not known, please estimate.

*Chapter 647 Form: Basic Information - * Indicates required field

**Date of Incident (mm/dd/yyyy):**

Enter date of incident.

**Name of Agency:**

Enter the agency name.

**Enter Address of Agency:**

Enter address of agency.

City   State   ZIP Code

**Agency Contact Person with Title:**

Enter the name and title of agency contact person.

**Agency Contact Phone Number:**

Enter the phone number of agency contact person.

**Agency Contact Email Address:**

Enter the email address of agency contact person.
Loss/Theft of Property

Description of Property Lost/Stolen:

Value of Property Lost/Stolen:

Enter a value for the lost/stolen property.

Circumstances Surrounding Loss/Theft of Property:

Was Confidential Information Contained in the Lost/Stolen Item?
Select one

Describe the Confidential Information:

Variance/Loss of Funds

Amount of Variance/Loss of Funds:

Enter an amount of variance/loss of funds.

Description of Variance/Loss of Funds:
Circumstances Surrounding Variance/Loss of Funds:

Cause of Variance/Loss of Funds:

Submit Your Report
Appendix 3 – Mission Statements

MISSION of the Massachusetts System of Public Higher Education

Massachusetts Public Higher Education is a SYSTEM with a distinguished past, increasing and measurable accomplishments, and dedicated to being recognized as having one of the nation's most outstanding array of institutions. It comprises 15 community colleges, nine state universities, and five campuses of the University of Massachusetts. The system exists to provide accessible, affordable, relevant, and rigorous programs that adapt to meet changing individual and societal needs for education and employment. The public system is committed to continuous improvement and accountability in all aspects of teaching and learning. The Board of Higher Education, together with each respective Board of Trustees, expects all students, faculty, and staff to be held to exacting standards in the performance of their roles and responsibilities.

MISSION of the Community Colleges

The fifteen Massachusetts Community Colleges offer open access to high quality, affordable academic programs, including associate degree and certificate programs. They are committed to excellence in teaching and learning and provide academic preparation for transfer to four-year institutions, career preparation for entry into high demand occupational fields, developmental coursework, and lifelong learning opportunities.

Community colleges have a special responsibility for workforce development and through partnerships with business and industry, provide job training, retraining, certification, and skills improvement. In addition, they assume primary responsibility, in the public system, for offering developmental courses, programs, and other educational services for individuals who seek to develop the skills needed to pursue college-level study or enter the workforce.

Rooted in their communities, the colleges serve as community leaders, identifying opportunities and solutions to community problems and contributing to the region’s intellectual, cultural, and economic development. They collaborate with elementary and secondary education and work to ensure a smooth transition from secondary to post-secondary education. Through partnerships with baccalaureate institutions, they help to promote an efficient system of public higher education.

The community colleges offer an environment where the ideas and contributions of all students are respected. Academic and personal support services are provided to ensure that all students have an opportunity to achieve academic and career success. No eligible student shall be deprived of the opportunity for a community college education in Massachusetts because of an inability to pay tuition and fees.
Cape Cod Community College Mission Statement

Mission and Vision
The revised mission of the College reflects continuity with the prior mission, and focuses more clearly on the essential elements of the work of the College. The College did not previously have a vision statement.

Mission Statement
Student success is the first priority at Cape Cod Community College. As a teaching and learning community, we provide opportunities and pathways that encourage students to achieve their goals. We enrich our unique region through our work, partnerships and students’ achievements.

Vision Statement
CCCC will be an innovative center for academic excellence and community enrichment that champions student success.
Appendix 4 – Organizational Chart

The Organizational Chart is located in the Human Resources Department and is incorporated into the Internal Control Plan.
Appendix 5 – Fraud, Waste and Abuse Policy

BACKGROUND

Cape Cod Community College recognizes the importance of, and need for, strong controls, which will aid in the detection and prevention of fraud, waste, and abuse against the College. Fraud prevention and detection must be a part of each employee’s job. To this end, the College will provide employees with the resources, knowledge, and training to prevent and detect fraud, waste, and abuse. It is the intent of the College to incorporate guidelines and assign responsibility for the continued development and implementation of controls.

Fraud is defined by the Association of Certified Fraud Examiners as “the use of one’s occupation for personal enrichment through the deliberate misuse or misapplication of the employing organization’s resources or assets.” Others define fraud as “a deliberate deception to secure an unfair gain.” Not all fraud is preventable, but the risks can be minimized through strong controls, policies, and procedures.

This policy applies to any fraud involving employees, consultants, vendors, contractors, and others who have a business relationship with the College.

FRAUD PREVENTION POLICY

Cape Cod Community College

PURPOSE

The College is committed to protecting its revenue, property, proprietary information and other assets. The College will not tolerate any misuse or misappropriation of those assets. This Fraud Prevention Policy is established to provide guidance to employees when misuse or misappropriation of College assets is suspected and to facilitate the development of protocols and practices which will aid in the detection and prevention of fraud.

SCOPE OF POLICY

This policy applies to any fraud perpetrated by a student, employee or official of the College (collectively “employees”), as well as consultants, vendors, contractors, outside agencies and/or any other parties with a business relationship with the College. Any investigation commenced pursuant to this policy shall be undertaken without regard to a person’s length of service, position or title, or relationship to the College.
ACTIONS CONSTITUTING FRAUD

The term fraud includes, but is not limited to, the following:

- Any dishonest or fraudulent act;
- Forgery or alteration of any document or account belonging to the College;
- Forgery or alteration of a check, bank draft, or any other financial document;
- Intentional misuse and misreporting of time in the HR/CMS system;
- Unauthorized disclosure of confidential and proprietary information;
- Unauthorized disclosure of securities activities of the College;
- Fraudulent misuse of College facilities or equipment (i.e. vehicles, telephones, computers, email);
- Misappropriation of funds, securities, supplies, or other assets;
- Assigning an employee to perform non-employment-related tasks;
- Accepting or seeking anything of substantial value from contractors, vendors or persons providing services/materials to the College;
- Authorizing or receiving payment for goods not received or services not performed;
- Impropropriety in the handling or reporting of money or financial transactions;
- Intentional violation of College purchasing requirements;
- Profiteering as a result of insider knowledge of College activities;
- Theft, destruction, removal or fraudulent use of College records, furniture, fixtures, intellectual property and equipment; and/or
- Actions related to concealing or perpetuating abovementioned activities.

If there is any question as to whether an act constitutes fraud, please contact the Vice President of the affected work area and/or the Vice President of Finance and Operations.

EMPLOYEE RESPONSIBILITY

All employees of the College, regardless of ranks or position, have a stewardship responsibility with regard to College funds and other assets. College employees are responsible for safeguarding College resources and ensuring that those resources are used only for authorized purposes in accordance with College rules, policies, and applicable federal and state laws.

- When fraud is suspected, observed, or otherwise made known to an employee, the employee must immediately report the activity to her/his supervisor.

- If the employee has reason to believe her/his supervisor may be involved in fraudulent activity, the employee is obligated to report the activity to the next higher level of management or to another College official such as the Vice President for Finance and Operations, and/or Associate Vice President of Human Resources.

- The reporting employee shall refrain from discussing the matter with any other person within the College unless directed to do so by the AVP of Human Resources. A unit member may discuss the matter with a state-wide union representative (not a local chapter representative).

- All employees shall cooperate fully with any investigation performed by the College, oversight agencies and/or law enforcement officials.
Any College employee reporting suspected, observed or otherwise known fraudulent activity will be held harmless and not subject to retaliation.

**MANAGERIAL RESPONSIBILITY**

All management personnel are responsible for detecting and preventing fraudulent activities in their respective work areas. All management personnel will be familiar with the types of activities that constitute fraud and be alert for any indication that improper or dishonest activity is or was in existence in her/his work area.

- If a member of management suspects fraud, or has received a report of fraud from an employee, she/he must contact her/his supervisor immediately.

- When a supervisor is informed by management personnel that fraud is suspected, the supervisor must immediately contact the Vice President of the affected work area, who will consult with the AVP of Human Resources and Legal Counsel.

- Upon investigation, if the College determines that fraud exists, the College shall take immediate remedial action to halt the fraudulent activity. If criminal activity has occurred, the College shall report the activity to appropriate oversight agencies and/or law enforcement officials (Office of the State Auditor, OSA, via Chapter 647, State Ethics Commission, etc.)

- All management personnel shall cooperate fully with any investigation performed by the College, oversight agencies and/or law enforcement officials.

- Following all incidents of fraud, or at least on an annual basis, management personnel shall conduct a review of all internal controls, policies and procedures for the prevention and detection of fraud and implement new and/or modified controls when necessary.

**CONFIDENTIALITY**

All participants in a fraud investigation shall treat all information received confidentially. A person reporting suspected fraud may remain anonymous except as otherwise required by law.

Investigation results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. Any employee contacted by the media with respect to a fraud investigation shall refer the media person to the Director of College Communications.

**INVESTIGATION AND DISCIPLINE**

Employees who have committed fraud will be subject to disciplinary action up to and including dismissal. Any disciplinary action taken by the College as a result of its investigation shall be in accordance with the terms and conditions of applicable collective bargaining agreements and non-unit personnel policies. In all cases, the College reserves the right to refer the matter to appropriate oversight agencies and/or law enforcement officials for independent review, investigation and/or prosecution. The College’s internal investigation and disciplinary process shall be conducted independently from any external review performed.
ADMINISTRATION OF THIS POLICY

The Department of Human Resources is responsible for the administration, revision, interpretation, and application of this policy. The policy will be reviewed annually and revised as needed.

COMPLIANCE WITH STATE AND FEDERAL LAWS

In addition to this policy, the College shall comply with all applicable state and federal laws addressing fraud prevention, including, but not limited to:

- **Chapter 647 of the Acts of 1989 (MA Law):** Report on Unaccounted for Variances, Losses, Shortages, Thefts of Funds or Property
- **MGL Chapter 93H:** Unauthorized Release of Personal Information
- **MGL Chapter 268A:** Commonwealth of Massachusetts Ethics Laws
- **MGL Chapter 149, Section 185 (Whistleblower Statute):** Protects employees from adverse employment actions and retaliation for reporting violations of law.
- **Gramm-Leach-Bliley Act (Financial Services Modernization Act of 1999):** Requires financial institutions and others to ensure the security and confidentiality of personal financial information from their customers.
- **Accurate Credit Transactions Act of 2003 (“Red Flags Rules”):** Requires Financial institutions and others to implement programs to detect, prevent, and mitigate instances of identity theft.
- **Family Educational Rights and Privacy Act (“FERPA”):** Generally protects against the unauthorized disclosure of student record information, including social security numbers and grade information.
- **Health Insurance Portability and Accountability Act (“HIPAA”):** Generally protects against the unauthorized disclosure of medical records and information.

**Commonwealth Hotline Numbers**

Additional Commonwealth resources available for reporting fraud include:

- **Massachusetts Inspector General, (800) 322-1323** - To report suspected fraud, waste or abuse in government.
- **Massachusetts Attorney General – Fair Labor Helpline, (617) 727-3465** - To report violations of minimum wage and overtime laws and requirement for timely payment of wages.
- **Division of Unemployment Assistance, (800) 354-9927** - To report unreported wages or persons collecting benefits while working.
- **Office of the State Auditor, (617) 727-6200** - For state agencies to report variances, shortages or thefts of funds or property.
Appendix 6 – Information Technology Controls

The information technology policies and procedures enumerated below are located in the Information Technology Department and are incorporated into the Internal Control Plan.

- Written Information Security Policy (WISP)
- Information Technology Resources Use Policy
- FERPA Policy
- HIPAA Privacy Policy
- Incident Response Plan (under revision)
- Password Guidelines
- Red Flag Policy
- Remote Access Policy
- Emergency Procedures and Disaster Recovery Plan
Appendix 7 – Strategic Plan Summary

Goal Alignment with Massachusetts Department of Higher Education Vision Project Goals

CCCC is committed to fully supporting the Massachusetts’s Department of Higher Education Vision Project. The College wide goals are designed to align with the 6 outcomes of the Vision Project and to provide data that is consistent with the Vision Project metrics. The chart below details the direct correspondence of the CCCC College wide goals with the DHE Vision Project Outcomes.

<table>
<thead>
<tr>
<th>CCCC College-Wide Goal</th>
<th>Vision Project Outcomes</th>
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<tbody>
<tr>
<td></td>
<td>College Participation</td>
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<td>College Completion</td>
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<td>Student Learning</td>
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<td></td>
<td>Workforce Alignment</td>
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<td></td>
<td>Preparing Citizens</td>
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<td></td>
<td>Closing Achievement Gaps</td>
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<tr>
<td>Empower student success</td>
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<tr>
<td>Integrate the College and Community</td>
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<tr>
<td>Create operational and academic excellence</td>
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<tr>
<td>Ensure the financial stability and long term sustainability</td>
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Goal Alignment with NEASC Standards

CCCC is accredited by The New England Association of Schools and Colleges (NEASC). Accreditation requires demonstration that the College meets the NEASC Standards of Accreditation and complies with its policies. The standards establish criteria for institutional quality and set expectations for excellence, continuous improvement and increasing effectiveness. As outlined in the chart below, the goals of the strategic plan are directly aligned with the NEASC standards. The standards (1-9) are listed below the chart and a full description of each of the NEASC Standards of Accreditation are in Appendix B.

<table>
<thead>
<tr>
<th>CCCC Strategic Goal</th>
<th>NEASC Standards</th>
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<tr>
<td></td>
<td>1</td>
</tr>
<tr>
<td>Empower student success</td>
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<tr>
<td>Integrate the College and Community</td>
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<tr>
<td>Create operational &amp; academic excellence</td>
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<tr>
<td>Ensure the financial stability and long term sustainability</td>
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Standard 1: Mission & Purposes
Standard 2: Planning & Evaluation
Standard 3: Organization & Governance
Standard 4: The Academic Program
Standard 5: Faculty
Standard 6: Students

Standard 7: Library & Other Information Resources
Standard 8: Physical & Technological Resources
Standard 9: Financial Resources
Standard 10: Public Disclosure
Standard 11: Integrity
Appendix 8 – Strategic Plan – External & Internal Analysis

Introduction. Cape Cod Community College (CCCC) is a small (2,101FTE), two-year college located on Cape Cod, MA a mainly rural, 65 mile-long peninsula that is linked to the mainland by two bridges. It is the only institution providing access to comprehensive higher education on Cape Cod and the islands of Martha’s Vineyard and Nantucket. CCCC serves the peninsula of Cape Cod and portions of Plymouth County in Southeastern Massachusetts.

A. INSTITUTIONAL NARRATIVE

Student success is the first priority at CCCC. As a teaching and learning community, CCCC provides opportunities and pathways that encourage students to achieve their educational and career goals, and enrich the Cape Cod and Islands region through our work, partnerships and students' achievements. In Fall 2014, there were 3,818 students enrolled in credit courses. In addition, community education, non-credit and workforce programs served another 735 students. The college draws 80% of its students from 10 towns, and the remainder from another 10 towns. Cape Cod has seen a demographic decline, losing 6% of its population since 2003 (2013 population was 214,990). Among the fastest declining age groups are 15-19 year-olds, who declined by 17% in the last decade. As of the 2013 census estimate, 27.1% of the population in this region is aged 65 and over. In addition to the shift to an older population base, Barnstable County has also seen a persistent economic recession (statscapecod.org).
CCCC plays an important role in the community as the only institution providing access to face-to-face comprehensive higher education locally and offers quality programs at an affordable cost. The college also plays a vital role in the area as a workforce development partner, as a provider of community education and of cultural programming. **Magnitude of the Need.** The majority of students at CCCC are at-risk. Among degree-seeking students enrolled in fall 2014, 49.7% were low-income, 44.6% were the first-generation in their family to attend college, and 11% had a documented disability. Racial/ethnic minorities comprised 21% of the student body (7% Hispanic, 6% Black, 2% Asian, 2% other, 5% two or more races). This is much higher than Barnstable County’s 6.2% minority population. Sixty-two percent of students are women; the median age of the student body is 23, and 53% of students are ages 18-24. **Most students who enroll at CCCC are economically and/or academically disadvantaged.** In Fall 2014, a significant number (49.7%) of CCCC’s matriculated students were Pell eligible. The overall number of low-income students is likely even higher because in 2013-14 only 52% of credit students completed the FAFSA and applied for financial aid, despite outreach efforts. The percentage of low-income students enrolled in the College steadily rose since 2009 to 2014 (from 25% to 49.7%). In academic year 2013-14, $10.1 million of need based aid awards were distributed, despite the relatively low cost of attending a community college. Most of the aid disbursed is in the form of federal (50.1%) and state (13.9%) grants, institutional grants are the third largest category (8.93%), totaling $10,608,352 in 2013-14. **57% of matriculated students present one or more academic risk factors,** such as being enrolled in developmental math courses, having a documented disability, having a GPA of 2.5 or lower, being under academic probation, being employed for over 20 hours a week, or being veteran or single parents. **In Fall 2014, of the 1,251 students who took the placement test 897 (71.7%) tested into**
**developmental math.** However, only 22% of students are enrolled in developmental courses, and only 13% of those who enroll progress to college level course within two years (2011-12 baseline), a disconnect that shows students are not progressing.

**Staff.** CCCC currently has 69 full-time faculty members and 189 part-time instructors. The number of full-time professional staff equals 89; including 64 who provide direct services to students (e.g. registration, advising, student life, counseling, tutoring, etc.). There are 87 part-time professional staff at CCCC. By contract, all full-time faculty teach five courses each semester, advise 18 students and serve on governance committees. Student Services such as admissions, financial aid, advising, registration, orientation and co-curricular programs are staffed by full time professional staff:

<table>
<thead>
<tr>
<th>Table I. Massachusetts Performance Based Funding Formula</th>
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<tbody>
<tr>
<td>Certificate Completion</td>
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<tr>
<td>Associate Completion</td>
</tr>
<tr>
<td>Transfers Above 24 SCH</td>
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<tr>
<td>30 Credits Hours</td>
</tr>
<tr>
<td>Completions: English</td>
</tr>
<tr>
<td>Completions: Math</td>
</tr>
<tr>
<td>Degree Awards per 100 FTE</td>
</tr>
<tr>
<td>Six Year Success Rate (3 Year Avg)</td>
</tr>
<tr>
<td>Total</td>
</tr>
</tbody>
</table>

CCC’s FY14 budget was $31 million, with 45% funded by the Commonwealth of Massachusetts, 22% of revenue from tuition and fees and a full 33% of resources from grants and contracts, compared to national average of 27%. It is imperative that CCCC improve enrollment and retention to boost revenues from tuition and fees to become more stable. This is especially important because Massachusetts is transitioning to performance-based funding for higher education, and CCCC has struggled with low retention and graduation rates. The new formula funding is 45% based on a six- year success rate, which includes **graduation rate, transfer rate and retention** (based on the number of students who completed 30 credit hours, and who completed the Math and English development sequence). **Nearly 50% of CCCC’s students do not return after their first year.** The institution needs to better support, engage, and motivate students to ensure they succeed and to better carry out its mission.
Given the demographic transition in its service area, declining public funding for colleges in Massachusetts, along with rapid faculty and staff retirement/transition within the institution, there is increasing institutional and state pressure to improve student outcomes. **CCCC is committed to raising retention, graduation and transfer rates over the next five years to a level that makes the institution fiscally stable and that better serves student needs.** Support from Title III will allow CCCC to build its institutional capacity to improve core services and curriculum, and to establish stronger student support services from enrollment to completion to improve retention, degree and certificate completion and transfer for all degree-seeking students.

**B. COMPREHENSIVE DEVELOPMENT PLAN**

**i. INSTITUTIONAL STRENGTHS, WEAKNESSES AND S PROBLEMS**

A summary follows of the data used to identify the needs and analyze problems, inform strategies and solutions. Among the main sources were CCCC’s strategic plan (Spring 2014) and the five-year accreditation self-study (Spring 2013). All goals and activities are fully aligned with the Massachusetts long-range plan for public higher education (*The Vision Project*).

<table>
<thead>
<tr>
<th>STRENGTHS</th>
<th>WEAKNESSES</th>
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<tbody>
<tr>
<td><strong>Student - Faculty Interaction</strong> Community College Survey of Student Engagement CCSSE results for both 2011 and 2014 show CCCC scoring significantly above the national average on the student - faculty interaction scale (55.1 in 2011, and 51.5 in 2014, compared to a standardized score of 50 nationally).</td>
<td><strong>Low retention rate</strong> (50% of all degree seeking students return fall to fall in 2014). First-time student retention is the lowest among all Massachusetts Community Colleges at 48.9%.</td>
</tr>
<tr>
<td><strong>Early Alert System</strong> CCCC began implementation of an early alert/academic intervention program utilizing Starfish software in 2012. The system allows instructors to issue academic alerts, track student attendance and progress, send messages to students.</td>
<td><strong>Low Graduation Rates.</strong> Only 19% of students complete a degree in 3 years, the third lowest in MA.</td>
</tr>
<tr>
<td><strong>Articulation Agreements</strong> CCCC has 279 transfer agreements through the MassTransfer program and 17 transfer agreements with other colleges.</td>
<td><strong>Low Progression Rates from Developmental Math Education to College level courses:</strong> Of the 70% of students who place into developmental math education (pre-college level), only 13% progress to college level course within two years (2011-12 baseline). This is the worst rate in the State of Massachusetts.</td>
</tr>
<tr>
<td><strong>Curriculum that fails to engage students in active and collaborative learning</strong> CCCC scored significantly below its peers on the Active and Collaborative learning benchmark (46.1 compared to national mean of 50) on the CCSSE 2014 survey.</td>
<td>**</td>
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<tr>
<td>STRENGTHS</td>
<td>WEAKNESSES</td>
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<tr>
<td><strong>Cape Cod Community College</strong></td>
<td><strong>Cape Cod Community College</strong></td>
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<tr>
<td><strong>First Year Success</strong> program has a good success rate with 58% of first time students retained after the first year, compared to 50% of the general student population, however serves only a limited number of students currently (298 students).**</td>
<td><strong>Limited capacity to provide high impact intervention practices. First Year Success program could increase retention by at least 20%, but needs to be scaled up to reach all first time students (currently only reaches 298 students).</strong></td>
</tr>
<tr>
<td><strong>Strong Academic Support Services</strong> 3 centers devoted to providing the academic support students need. Services are offered at no charge to students. Tutoring Center, Writing Resource Center and Math Learning Center offer drop-in tutoring.</td>
<td><strong>Quality and availability of Academic Advising received low scores on both the 2014 CCSSE and the 2012 Noel Levitz survey. It was also ranked the number one priority on the 2014 student survey. Only 3 FT advisors; 744 students have no assigned advisor.</strong></td>
</tr>
<tr>
<td><strong>Strong K-12 partnerships</strong> CCCC has been working closely with 10 school districts and other partners in the region to improve college readiness and curriculum alignment. Dual enrollment program recruited 136 students from 21 schools in Fall 2014.</td>
<td><strong>Limited ability to support students in gateway courses Gateway courses have lower success rates (63% complete successfully in 25 gateway courses, compared to overall 80% completion). Lack of scaffolds and support services for students in gateway courses hampers success.</strong></td>
</tr>
<tr>
<td><strong>Assessment of Student Learning Outcomes</strong> improved. Assessment Grant offered faculty professional development on refining and documenting student learning outcome assessment. 35 full time and adjunct faculty participating.</td>
<td><strong>Limited ability to offer professional development for faculty. Teaching and Learning Center (TLC) recently created, but the one part-time staff member lacks expertise to train faculty on high impact teaching practices across the institution.</strong></td>
</tr>
<tr>
<td><strong>Strong institutional research capacity and self-study provides clear direction for change to improve student outcomes/accountability CCCC is very responsive to data based accountability, measurement of student learning outcomes and reporting requirements from State, and accreditor.</strong></td>
<td><strong>Lack of appropriate scheduling tools results in too much staff time and effort spent on scheduling and increases time to degree. Noel Levitz (2012) data ranked course scheduling as #1 student challenge. Only 19% complete degree within 3 years. Only 53% of students who graduate finish on time (baseline 2012-14).</strong></td>
</tr>
<tr>
<td><strong>Recruiting and Serving a Diverse Population</strong> Ethnic/Minority enrollment at CCCC is 21%, compared to 6.2% in our service area.</td>
<td><strong>Weak reach of existing orientation and other resources for first-time students. Need to create mechanisms for students to transition successfully (online orientation and resources for students). In Fall 2014, 541 of 1,813 incoming students attended orientation (30%).</strong></td>
</tr>
<tr>
<td><strong>Improved grants management</strong> and compliance capacity. CCCC recently hired a grants compliance officer.</td>
<td><strong>Slow progression in Developmental Math. Only 13% of students who test into developmental math progress to college level courses within 2 years.</strong></td>
</tr>
<tr>
<td><strong>Improved Instructional Technology</strong> CCCC has made significant strides to improve technology on campus. There are 54 smart classrooms on campus and two computer labs for student use (one on main campus and one at the Hyannis Center).</td>
<td><strong>Lack of technology to efficiently process applications, transcripts and other student records. Paper based processes are costly and causes delays. This decreases the quality of services to students and negatively impacts advising and transfer processes.</strong></td>
</tr>
<tr>
<td><strong>Fiscally responsible decision-making.</strong> College has a Reserve fund and endowment funds and has not yet relied on financial reserves to support state budget reductions. The primary reserve ratio is 23.2, third largest among state community colleges, and was highest in private funds received in FY2014.</td>
<td><strong>Projected budget gap of approximately $800,000 for FY16 given declining revenues due to declining enrollments. Low retention and graduation might lead to structured lay-offs.</strong></td>
</tr>
<tr>
<td><strong>Effective grant planning</strong> and ability to leverage resources and fundraise for strategic initiatives. CCCC has been awarded over $4.2 million in competitive funds in FY15.</td>
<td><strong>Low retention, graduation and transfer rates have negative effect on fiscal stability given new state performance-based funding formula that is 50% dependent on increasing these rates.</strong></td>
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1 *Instructional Scaffolding* is the support given by teachers during the learning process which is tailored to the needs of the student with the intention of helping students achieve learning goals (Sawyer, 2006)
Academic Program Strengths

Strong Student Faculty Interaction: Community College Survey of Student Engagement

CCSSE results for 2011 and 2014 both show CCCC scoring significantly above the national average on the student faculty interaction scale (55.1 in 2011 and 51.5 in 2014, compared to a standardized score of 50 nationally). Early Alert System: CCCC began implementation of an early alert/academic intervention program utilizing Starfish software in 2012. The system allows instructors to issue academic alerts, track student attendance and progress, and send messages to students. It can also schedule appointments and make referrals to support services, and document if students have completed the referral. The system can be used in many ways to engage students and let students know whether they are at risk early on during the term. To date, 106 faculty members (32%) have been trained on how to use Starfish, and approximately 7,000 interventions (flags, referrals and kudos) were issued to over 1,350 students. According to a survey of users, 61.3% of faculty who have used Starfish are very satisfied or extremely satisfied with the results. However, a large number of faculty and students have not yet been trained in using the tool; this can be addressed under Title III. Articulation agreements and quality transfer programs: The College participates in the statewide Mass Transfer program, which guarantees students admission and full transfer of credit to baccalaureate programs in state public higher education programs. CCCC has 279 transfer agreements through the Mass Transfer program and 17 transfer agreements with other colleges. In 2014, 1,924 students (59%) of matriculated students were enrolled in transfer focused programs, however, historically, only a percentage of those students eventually transfer (19%).

First Year Success Office: The First Year Success Office serves full-time, first-time in college students who have placed into developmental education, with a comprehensive academic plan to

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<th>Table II. Four Year Transfer Rate for Students Starting in Fall 2010</th>
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<tr>
<td>Four-year transfer rates</td>
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<td>*Matriculating students first enrolled in Fall 2010.</td>
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navigate challenges that new students face during the first year. Academic Advisors work closely with students to create a personalized plan for academic success. The First Year Success office helps students discover the resources available at the college that support their academic goals. Although the students served by the First Year Success Office are at risk (all are enrolled in at least one developmental course), these students who are assigned to this support program are retained in larger numbers than the general student population (58% of the 298 FTCS students assigned to the First Year Success program are retained after their first year, compared to 50.9% of the general student population). **Availability of Academic Support Services:** CCCC operates three support centers devoted to providing students with the academic support they need. Services are offered at no charge to students. The Tutoring Center offers by-appointment tutoring for most courses, the Writing and Reading Resource Center offers drop-in tutoring for writing and reading assignments across disciplines, and the Math Learning Center offers drop-in tutoring for math classes and math topics related to science, business, health and other fields. The Centers are staffed by a team of Learning Specialists, professional and peer Tutors. All Centers share a learner-first approach, offering a learning experience tailored to the student’s individual needs. The CCSSE results ([http://www.ccsse.org/](http://www.ccsse.org/), 2014) shows that scores on questions related to the utilization of academic support services at CCCC were above the national mean. Data collected by the tutoring center shows that 77.3% of students who visit the tutoring center pass the course for which they received tutoring. College-wide course completion rate data show the completion rates for targeted math and science courses at 35% in Math to 73% in Biology. CCCC’s student support services have been expanding to meet increasing demand and are currently operating at capacity. The hours of the Math Learning Center and Reading and Writing Center were expanded in the Fall 2013. The Reading and Writing Center expanded service hours, resulting in
an increase of 35% in users and a 33% increase in the number of unique students served. Tutoring Center appointments increased 23% in Spring 2014 over the prior year. The tutoring program increased the number of peer tutor hours weekly from Fall 2011 to Fall 2013 by 35%.

The Tutoring Center has also promoted group tutoring sessions to accommodate more student appointments. Demand for tutoring appointments has strained available resources. Usage of eTutoring has also increased and demand will soon exceed the 150 hours per semester available to the college, due to limited funds to provide this service. Despite efforts to expand student support services soon we may not be able to fully meet the demand which expanded by 35% between Fall 2013 and Fall 2014. **Strong K-12/College Readiness Partnerships:** CCCC has been working closely with K-12 districts and other partners in the region to improve college readiness and curriculum alignment. Faculty from CCCC and K-12 meet on regularly to align curriculum, the expected outcome is that fewer students will be academically underprepared in the future. CCCC also has a strong dual enrollment program which provides high school students with the opportunity to earn both high school and college credit and to become familiar with the college. **Improved Assessment of Student Learning Outcomes (SLOs):** CCCC has provided faculty institutes serving 35 faculty members working in teams to align assessment of student learning outcomes by discipline or program. This Assessment pilot, funded with a state grant, focused on faculty professional development for adjunct faculty and resulted in a cultural shift in which professional development is seen as an opportunity to reflect on how to improve alignment between learning outcomes, curriculum and evaluation of student learning. Plans to scale up the Assessment pilot to 90% participation under the SAIL program is proposed here.

**Academic Programs Weaknesses and Significant Problems to be addressed by Title III**

**Low Progression Rates from Developmental Math Education to College level courses:** Of the 70% of students who place into developmental math education (pre-college level), only 13%
progress to college level course within two years (2011-12 baseline). This is the lowest rate in the State of Massachusetts. **Limited opportunity for students to participate in high impact practices:** Limited student participation in high impact practices such as the First Year Success program, is contributing to attrition. CCCC needs to impact more students who are academically under-prepared or at risk since most of the students enrolled CCCC have a risk factor (low income, academically under prepared, first generation). For those high impact practices to reach their full potential, it is necessary that the college reach most first-time students, especially part time students whose retention rate is lower than full time students (Table III). The current First Year Success pilot project served 298 full-time students, approximately 1/3 of the first-time full-time student cohort. CCCC’s proposed Title III Activity addresses embedding these strategies into the advising process and will allow us to reach a large number of first-time students (CCSSE 2013).

**Curriculum that fails to engage students in active and collaborative learning or is out of sync with industry needs:** Collaborative projects that require students to engage with each other in and outside of the classroom and foster a sense of community are not as widely available across the curriculum as would be desirable. The last CCSSE survey shows that CCCC scored significantly below the national benchmark (46 compared to national average of 50). Few faculty have had formal training in active and collaborative learning. CCSSE results also rank CCCC low on academic challenge, scoring below peers on that benchmark (48 compared to 50). This is important because studies show (AAUP LEAP Initiative, Kuh et al. 2010) practices that require students to interact with faculty, peers and mentors impact both student performance and persistence in a positive way (CCSSE 2013). Low scores on this benchmark suggest that professional development could enable faculty to redesign curriculum in gateway courses to

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<th>Table III - Retention by Part/Full Time Status</th>
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<td>Student Retention</td>
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<td>Part Time</td>
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<td>Full Time</td>
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further engage students. **Insufficient capacity to provide quality academic advising to students:** CCCC’s advising center is insufficiently staffed to address student needs. The college currently has 3 full-time advisors and a ratio of 525 students per advisor, well below NACADA recommended levels\(^2\). Currently, 744 students have no assigned advisor (i.e. are assigned to the advising center but have no specified advisor), and have to rely on the walk-in advising center, staffed primarily by part time advisors. The result is that advising is not always consistent and many students end up signing for the wrong courses or unnecessary courses, a barrier to completion. Academic and career advising often occurs without key student information, such as student goals and plans. The initial advising process focuses primarily on first semester courses and misses an opportunity for advisors to ask students about risk factors (such as low income, first generation, lack of academic plans), as well as to discuss their academic and transfer goals. This contributes to keeping students disengaged. CCSSE 2014 results indicate that 27% of students rarely or never use academic advising or planning services, and 49% rarely or never use career counseling. There is also a lack of automated degree auditing capacity at present and little or no integration of basic advising with career information and transfer advising. **Limited ability to support student success in gateway and developmental courses:** Many of CCCC’s gateway\(^3\) courses do not have a curriculum design that supports student success and helps develop the skills students need to progress. The successful completion rate in gateway courses averages only 63% compared to 80% in all courses. In the CCCC planning process, faculty noted that first-year students lack key success skills such as critical thinking, communication, time management and organization, all of which are necessary to succeed in

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1. NACADA (nacada.ksu.edu) reported a median ratio median 441 students to 1 for 2-year institutions to 1 FT advisor.

3 Gateway courses are defined as those that have high numbers of students who do not pass and that are necessary for students to progress in their program of study.
college. Often, developmental and gateway courses provide students with discipline-related content, but do not develop the skills required to master content and to progress. This results in a large percentage of students not progressing to the next level. Faculty, especially part-time faculty, feel unprepared to incorporate much needed success skills into their courses without professional development that focuses on such topics. College 101, an optional 3-credit course designed to help students navigate college, has been the mechanism to deliver these skills, but typically only 5% of students enroll. The curriculum of these courses needs to be redesigned to integrate student success skills with discipline-based content of each course.

Limited capacity to provide high quality professional development for faculty and staff: Despite the fact that many faculty at CCCC were not trained in high impact pedagogical practices, only recently CCCC created a Teaching and Learning Center (TLC) to promote professional development and promote high impact teaching practices. But the TLC is currently staffed with faculty release time, has limited reach within the college, and there are gaps in the in-house expertise available.

Institutional Management Strengths

Improved Technological Capacity: CCCC invested in technology, and made significant strides to improve IT services on campus, with Wi-Fi improved campus-wide in 2014. There are 54 smart classrooms on campus and two computer labs for student use (one on main campus and one at the Hyannis Center). Improved Institutional Research Capacity: The institutional research office has increased its staff capacity significantly in the last 3 years from 1.5 to 2.5 staff, and added to the qualifications of the staff, (now has 2.5 staff, two of whom hold PhDs, and one with a BS, as opposed to the previous 1.5 staff, one MS) resulting in greater ability to monitor student data and produce reports for planning and assessment of student learning outcomes. Improved grants management and compliance capacity: CCCC has recently increased the grants office staff capacity by hiring a qualified grants manager/compliance officer.
who oversees all post-award aspects of grants in close coordination with staff and faculty.

Increased capacity will improve the institution’s ability to manage grants and deliver outcomes.

**Institutional Management Weaknesses and Problems to be addressed by Title III**

Some of CCCC’s systems and management processes are weak or inadequate, leading to a disconnect with students at time of intake. Stakeholders participating in the planning process specifically have mentioned placement testing, course scheduling and orientation as problematic.

**Inaccurate Student Placement:** The tool used to place students into courses needs to be fine-tuned or replaced altogether, especially for students who have graduated from high school within the immediate past three years, based on a state pilot test analysis. Currently the placement test (Accuplacer) is causing additional students to be placed into developmental courses who can move directly into entrance level college math. According to Accuplacer baseline results, only 30% of first time students place into college level math. In comparison, the state pilot using High School GPA which showed that 42-50% of first time students could place directly into college math and succeed; this result is consistent with a study conducted by Belfield and Crosta (2012). New alternatives and procedures for placement, especially for recent high school graduates, need to be piloted and tested. **Mandatory Orientation is not enforceable:** CCCC only offers face-to-face orientation at this time, with no immediate consequences for non-attendance, resulting in a relatively small number of students participating. In Fall 2014, 541 of 1,813 incoming students participated in orientation (approximately 30%), and in Spring 2015, only 105 of 831 (or 12.6%) of students participated in orientation. Although students who attended rate the orientation favorably, participation cannot be enforced since the budget is inadequate to offer enough sessions to enable all students to attend in person. This is a missed opportunity to connect with students and provide information that will be crucial for their success at CCCC. **Lack of**
without the ability to respond to student demands and needs. It is done on paper by the Deans, and has to be entered into two different systems that do not reconcile. As the college shifts towards degree pathways and the need to implement default and block scheduling of key courses, the lack of a compatible course scheduling system is a significant obstacle to offer courses at times that are the most appropriate for students. The existing system utilized to schedule courses (R25) and allot campus space does not reconcile with the student information system (Jenzabar), causing frequent errors and scheduling conflicts. The disruption to students at the beginning of each semester is considerable and is a factor in student attrition. Data from the Noel Levitz survey administered in 2012 showed that the number one challenge for students was that classes were scheduled at times not convenient for students. **Inability to process student records efficiently:** Technology lags behind in admissions and registration which are still utilizing paper-based processes. The result is inconsistent and inaccurate records processing, and problems with securely storing and accessing student academic records, transfer plans, immunization records and other documents needed to operate efficiently and effectively. To streamline the paper-based system, CCCC needs to acquire a digital imaging system. This will allow efficient use of staff, better student records, and improve service quality.

**Fiscal Stability Strengths**

**Institutional Reserves:** A five-year history of CCCC adjusted and unadjusted reserves appears below.
The Commonwealth of Massachusetts shifted the reporting of each respective agency’s pension liability (effective fiscal year 2015) and post-employment benefit liability (OPEB – effective fiscal year 2017) from the Commonwealth’s books to each agency; numbers are now reflected in the unadjusted reserve total for the College. The adjusted total reflects the reserve balance when an adjustment is made for the pension and OPEB liability. Reserves have not been used for operational budget shortfalls.

**Effective Grant Planning: Effective Grant Planning:** CCCC leverages resources and fundraises for strategic initiatives. CCCC’s grants office diligently pursues external funds to support the college mission. Grants and contracts represent up to 25% of the college’s revenues in FY17. CCCC was awarded over $5.2 million in funds in FY17. The College’s foundation is vibrant and conducted two capital campaigns in the last decade, with total assets of $1,968,648 at the end of FY17.

**Fiscal Stability Weaknesses and Problems to be addressed by Title III**

CCCC will not stabilize its finances if low retention and decreased enrollment of students continues. **Performance-Based Funding Formula:** State funding, which is the only public support given to Massachusetts colleges, has been decreasing over time. The state currently funds colleges at a lower level than in 2001, both in funds per FTE and total funds provided to the colleges. Additionally, the state’s appropriation formula is being revised to adopt a...
performance-based model driven by retention, graduation, and transfer rates. In the next fiscal year CCCC is projecting a budget gap of approximately $800,000 (3% of the FY19 operational budget). **Low retention rates have a negative effect on fiscal stability:**

Because the college’s budget depends on revenues from tuition and fees and on the performance-based state allocation, **improving student retention, graduation and transfer is critical to CCCC’s long-term fiscal stability.**

**ii. ANALYSIS OF SIGNIFICANT PROBLEMS TO BE ADDRESSED BY TITLE III**

CCCC has identified 14 major obstacles that significantly impact student progress and degree completion. Summarized below, all will be addressed by the proposed Title III Project, “SAIL.”

<table>
<thead>
<tr>
<th>Academic Problems</th>
<th>Consequences of Not Solving Problem</th>
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<tbody>
<tr>
<td>1. Low retention rate (50% of all degree seeking students return fall to fall in 2014). First time student retention is the lowest of Massachusetts at 48.9%.</td>
<td>Lack of success for CCCC’s students. First year retention rate is 50% (&amp; 48.9% of first-time students).</td>
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<tr>
<td>2. Low Graduation Rates. Only 19% of students complete a degree in 3 years. Third lowest in Massachusetts.</td>
<td>Only 19% of students complete AA/AS programs in 3 years. Only 19% of students transfer to four-year institutions within four years.</td>
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<td>3. Low progression Rates from Developmental Math to College level courses. Only 13% of those who enroll in developmental math progress to college level.</td>
<td>87% of students enrolled in developmental courses one level below college level math do not progress to college level math within two years and are unable to attain a credential and transfer, and may drop out.</td>
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<tr>
<td>4. Limited ability to offer students “high impact” practices in teaching &amp; advising that show positive outcomes e.g. First Year Success &amp; embedded tutoring</td>
<td>Students who can benefit from high impact practices are not currently being reached and are less likely to be successful.</td>
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<tr>
<td>5. Curriculum fails to engage students in active and collaborative learning or does not respond to employer and industry expectations.</td>
<td>Unengaged students are less likely to succeed in their courses and more likely to drop out. CCCC scored significantly below the national benchmark in student engagement in 2014 CCSSE survey (46 compared to national average of 50). Student surveys ranked improved curriculum as a priority.</td>
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<tr>
<td>6. Insufficient ability to provide quality academic advising that presents students a clear plan to degree completion, capacity for degree auditing and includes career planning.</td>
<td>Insufficient or inaccurate advising and degree planning results in students not taking courses necessary for their program of the study or in taking too many credits. Students are not retained (50% do not return the following fall), and only 19% graduate within 3 years.</td>
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<tr>
<td>7. Limited ability to provide support services for students in gateway courses due to lack of resources for tutoring and SI.</td>
<td>Results in lower success rates (63% complete successfully in 25 gateway courses compared to overall 80% successful completion) among students enrolled in gateway courses, and hampers student success.</td>
</tr>
</tbody>
</table>
8. Limited ability to provide professional development to faculty and staff due to lack of financial resources for training and staff expertise to implement training. Faculty who are unable to offer courses and programs that are engaging and in sync with industry needs. (Completion in gateway courses averages 63 %, compared to 80% in all courses.)

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<tr>
<th>Institutional Management Problem</th>
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<tr>
<td>9. Course scheduling that is not student-centered. Courses are not offered at times that work best for students due to lack of tools to build schedule around student needs.</td>
<td>Scheduling currently absorbs much staff time and effort and is not conducive to students completing degrees on time. Noel Levitz (2012) data ranked course scheduling as #1 challenge. Only 19% complete degree within 3 years (FY12-FY14).</td>
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<tr>
<td>10. Lack of online orientation and related student resources. Currently, students do not attend due to scheduling issues, but an on-line system will enable the college to require attendance or a hold will be placed on the student’s record.</td>
<td>Inability to help students consistently transition to CCC in a successful way, students are often unfamiliar about procedures and expectations when they enroll at CCC and don’t know about available resources and important information, such as how to login into their student email and learning management system, this hampers progress in courses.</td>
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<tr>
<td>11. Math Placement tool (Accuplacer) places students who score just below college level into developmental math, and existing policy does not mandate that students take required math courses as soon as they enroll.</td>
<td>Student progress is delayed by additional developmental courses. State pilot results show students with High School GPA 2.4 or higher can succeed in college level math. Student progress suffers. Inaccurate placement impacts ability to graduate.</td>
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<tr>
<td>12. Inability of the admissions, registration and other student related offices to process student records electronically, such as high school or transfer transcripts. Applications, transcripts and other student related documentation still is largely a paper based process at CCC. Lack of capacity to electronically store records requires extensive staff time to be entered into electronic systems and delays business process.</td>
<td>Results in need for added staff time and adds costs, increases time to process documents and decreases quality of service students receive. (e.g. if a transcript resides in paper file in admissions and cannot be accessed by advising, it will make the advising session less reliable or inaccurate, or will require time to access the file, or will require staff time to locate info that is not electronically available).</td>
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<tr>
<th>Fiscal Stability Problem</th>
<th>Consequences of Not Solving Problem</th>
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<td>13. Potential budget gap. Declining enrollment at CCC has resulted in declining revenue. However, CCC’s cost structure remains the same, resulting in an $80,000 deficit in the FY16 budget. FY 12 - FTE 2,593 appropriation $13.148 M; FY13 - FTE 2,491 appropriation $12.525 M; FY14 - FTE 2,346 appropriation $11.738 M.</td>
<td>Declining allocation and revenue projected to result in budget gap. Could lead to retrenchment of services and structured layoffs and impact the institution’s financial sustainability in the future.</td>
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<td>14. Ongoing Low retention (50%) and graduation and (19%) transfer rates (23%) are important factors in the state’s revised performance-based funding.</td>
<td>Given new performance-based funding formula, continued low retention, graduation, and transfer rates could be a threat to financial stability.</td>
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**Low Retention, Graduation and Transfer Rates:** Too few students are earning a credential/degree or transferring to a four-year college. First-year retention rate is 50%.

Only 19% of students complete AA/AS programs in three years. Only 19% of students transfer to four-year institutions within four years. **Proposed strategies:** CCC proposes
to develop degree pathways and course scheduling that are designed to create streamlined pathways to degree completion: degree/certificate, transfer, or preparation for the workforce. Among specific tasks are adding and institutionalizing the following strategies, using operational funds to institutionalize, and sustain them: block/default scheduling, new approach to advising with ability to perform degree audits and have electronic academic plans, revision of gateway courses to infuse success strategies into the curriculum, embedded tutoring and Supplemental Instruction to support progression in more challenging gateway courses; additional on-line tutoring to support the academic needs of cohorts through completion and transfer; use of assessment data to improve educational outcomes and programs. **Low Progression Rates from Developmental Math Education to College level courses:** Over 70% of students who take placement tests are placed into developmental math education (pre-college level). Only 13% of the students who tested one level below college level progress to college level courses within two years (2011-12 baseline). **Proposed strategies:** Developing and refining placement policies for developmental math and streamlining course sequences and multiple paths to complete developmental math, adding online modularized resources to allow students to progress at their own pace, embedding tutors and SI into courses, and revising developmental courses and intensive courses that allow students who test just below cutoff scores to take college level courses, with one additional hour of support per week to boost their skills. All will be institutionalized as described on page 23.

**Weak systems and inadequate tools result in CCCC failing to establish connection between students, faculty and advisors and provide essential information.** The orientation process reaches a limited number of students due to schedule conflicts and lack of funds to offer additional programs at more convenient times. Admissions, advising and registration
Proposed strategies: Tasks include: designing an improved orientation that can be offered in both face-to-face and online formats, improving placement systems to more accurately register students into accurate courses, improving capacity to access student information and data through the acquisition of document imaging software that will improve capacity of admissions, advising and registration to better serve students (electronic educational plan, degree audit capacity, and professional described on pg. 23. Declining allocation and revenue projections and a new funding formula, combined with continued low retention, graduation and transfer rates, pose a threat to financial stability. Proposed Strategies: CCCC will undertake, institutionalize and sustain the tasks of redesigning gateway course curriculum and supports, increasing related faculty professional development, adding opportunities for active and collaborative learning, improving course scheduling, and ensuring appropriate placement to increase the percentage of students who progress, graduate and transfer. These interventions are being adopted based on evidence based studies and results of interventions at other institutions (Bailey et al. 2015, Scrivener and Weiss 2013, Bettinger and Baker 2013, CCSSE 2013). Improving these metrics will increase performance-based funding received from the state.

iii. MAJOR CONSTITUENCIES INVOLVED IN ANALYSIS, PLANNING AND DESIGN

A Title III advisory group was convened in November 2014 to discuss and plan this proposal. All major constituencies were informed of the opportunity to be involved and were represented, and discussed problems and solutions, including the Board of Trustees. A special outreach effort was made to students. Planners met with the Student Senate in January 2015, PTK (honor society) in February 2015, and Peer Tutors in January and February. CCCC conducted a student survey in February. A student senator participated in
early planning meetings in January. Participants agreed that given the structure of the institution and characteristics of the student body—**most students present risk factors**—and of the faculty, and prior experience, it will be most efficient to target gateway courses and the academic advising process, to achieve institution-wide lasting change. Studies have shown that targeting courses has the potential to impact a large number of students, while benefiting at-risk students the most (Beichner et al. 2007, Fairweather 2008, Singer et al. 2012, Pellegrino and Hilton 2013). This approach has the advantage of being scalable and sustainable with relatively low cost. Providing clear and highly structured pathways for students benefits all students, especially those at risk, and decreases overall time to degree.

The planning group had broad representation from college constituencies, professional staff, faculty and students. Group discussions and planning sessions were conducted with students, faculty and staff to ensure activities support students at CCCC.

This proposal was developed based on quantitative and qualitative data provided by the Office of Institutional Research, CCCC’s Strategic Plan (2014), the NEASC 5-year self-study (2013), and student feedback from the national Community College Survey of Student Engagement (2014), enabling the planning team to conduct a comprehensive analysis of institutional strengths and weaknesses. In addition, the team involved in developing this proposal sought input from faculty, staff, students through campus-wide forums, focus group meetings, surveys, and meetings held over an 8-month period (2014-2015). Regional data comes from the Census Bureau, Workforce Investment Board, feedback from program advisory boards, community partners and K-12 schools. Key criteria in selecting the goals for the Title III project were consistency with the strategic plan (Spring 2014), and alignment with Massachusetts plan for public higher education, *The Vision Project*
Data on best practices at similar institutions, research of the literature, and communications with colleagues nationally also informed CCCC chosen strategies for this project. A summary of the data supporting identified needs and analysis of problems, strategies and solutions that informed the CDP follows.