

# SYSTEMS INSTITUTIONAL ENVIRONMENT POLICY

<b>Policy:</b>	Institutional Environment
<b>Policy Owner:</b>	CIO
<b>Change Management</b>	
<b>Original Implementation Date:</b>	7/1/2017
<b>Effective Date:</b>	7/1/2017
<b>Revision Date:</b>	
<b>Approved By:</b>	Executive Staff
<b>Crosswalk</b>	
<b>NIST Cyber Security Framework (CSF)</b>	ID.BE
<b>NIST SP 800-53 Security Controls</b>	CP-2, CP-8, CP-11, PE-9, PE-11, PM-8, PM-11, SA-12, SA-14
<b>NIST SP 800-171 Protecting Controlled Unclassified Information</b>	
<b>Center for Internet Security Critical Security Control</b>	
<b>Payment Card Industry Data Security Standard (PCI DSS) v3.2</b>	
<b>Procedure Mapping</b>	

## PURPOSE

To provide Pomona College with guidance in identifying and gaining an understanding of the components of the institution that make up its information security system and thereby enable Pomona College to manage cybersecurity risk to systems, assets, data, and capabilities.

## POLICY

Pomona College's objectives, stakeholders, and activities are understood and prioritized; this information is used by Pomona College to inform cybersecurity roles, responsibilities, and risk management decisions.

## EDUCATION SECTOR POSITION

- ❖ Pomona College provides services such as the Learning Management System and Student Information System as a service to the other member institutions of The Claremont Colleges.



- ❖ In providing these services, Pomona College is providing critical infrastructure to The Colleges.<sup>1</sup>

## ORGANIZATIONAL PRIORITIZATION

- ❖ Pomona College has established and communicated priorities for its organizational mission, objectives, and activities.
- ❖ Pomona College's mission, objective and activities are defined with consideration for information security and the resulting risk to Pomona College operations, assets, faculty, staff, students and the Claremont Colleges.
  - This guides Pomona College in determining its information protection needs and any necessary process revisions.

## CRITICAL DEPENDENCIES

- ❖ Pomona College addresses information security issues in the development, documentation, management, and updating of a critical infrastructure and key resources protection plan. The plan identifies and defines Pomona College dependencies and critical functions necessary for the delivery of critical services. Protection strategies are based on the prioritization of critical assets and resources.
  - This includes establishing alternate services to permit the resumption of essential functions within Pomona College's Recovery Time Objectives (RTOs) when the primary essential services are unavailable<sup>2</sup>.
- ❖ Pomona College identifies critical system assets that support essential Pomona College mission and business functions.
  - The identification of critical assets aids Pomona College in facilitating the prioritization of Pomona College resources.

## RESILIANCE

- ❖ Pomona College establishes resilience requirements of critical system components and functions in order to support and ensure the delivery of critical services to faculty, staff, students and the members of The Claremont Colleges.

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<sup>1</sup> Neither this Policy nor anything contained herein shall constitute or is to be construed as an admission by Pomona College as evidence of any liability for any issues whatsoever that arise out of or are related to critical infrastructure services that Pomona College provides to the other member institutions of The Claremont Colleges.

<sup>2</sup> See Recovery Policy for further details regarding Pomona College's RTO.