Exhibit 7.D.1 Examples of Internal Controls

A. On or before June 30th of each year, the University completes a State Agency Internal Control Questionnaire located at: http://www.osc.ct.gov/manuals/InternalCntl/contents.htm. The evaluation of internal control is aimed at identifying central weaknesses or opportunities for improvement.

B. The University complies with requirements of the State of Connecticut Office of State Ethics, which has jurisdiction from Title 1, Chapter 10 of CGS. A link to the Office of State Ethics website, which highlights its jurisdiction over state agencies: http://www.ct.gov/ethics/cwp/view.asp?a=2313&Q=311896&ethicsNav=|. Two areas of emphasis are:
   • As required by statute, contracts with a value of $50,000 or more, which have not been exempted, require ethics forms on part of both the Contractor and CCSU. Contracts with a value of $500,000 or more require additional ethics forms to be completed by the Contractor.
   • Legislators, other public officials, and senior state employees are required to submit a Statement of Financial Interest ethics filing to the Office of State Ethics by May 1st of each year.

C. The University has expended considerable effort into mitigating the risk associated with exposure of Personally Identifiable Information, as well as controls aimed at detecting any potential exposure of information. The University includes language in any contract where the contractor has possible access to PII which specifies the proper handling of PII as well as the procedures in the event of a breach. Furthermore PII from education records will only be disclosed to contractor if they meet one of the 3 exceptions under FERPA: 1. Contractor acting as a “School Official,” 2. Contractor conducting “study” on behalf of the University, or 3. Contractor has been designated as “Authorized Representative” of the BOR.

D. During the last 24 months, the University worked with a consultant to assist the University in identifying opportunities for improvement in how we accept and process credit cards to mitigate the risk associated with taking credit cards and to comply with the Payment Card Industry (PCI) standards. This effort resulted in changes to how we process certain transactions in our network as well as the implementation of policies and procedures to govern the processing of transactions. These policies are located at http://www.ccsu.edu/it/itpolicies/index.html. The University includes language, in accordance with the Gramm Leach Bliley (GLBA), in any contract where the contractor has access to financial information language which specifies the proper handling of this information as well as the procedures in the event of a breach.

E. During FY 2017, the University completed a University-wide Enterprise Risk Management Analysis for the BOR that included a heat map to quantify risk and to determine if any actions need to be taken to address/mitigate risk.