

Determined Breach Notification Form

Section 1

Complete and submit within 72 hours of determination or notification.

Determined

- ☒ Finance Cabinet Secretary
- ☒ Auditor of Public Accounts (APA)
- ☒ Kentucky State Police (KSP)
- ☒ Attorney General (AG)
- ☒ Commissioner of Department of Library and Archives, if breach determined
- ☒ Chief Information Officer of Commonwealth Office of Technology
- If Department of Local Government under KRS 61.931(1)(b) or (c) also contact:
 - ☒ Commissioner of Department of Local Government
- If Public School District listed in KRS 61.931(1)(d) also contact:
 - ☒ Commissioner of Kentucky Department of Education
- If Educational entity listed under KRS 61.931(1)(e) also contact:
 - ☒ President of Council on Postsecondary Education

Agency Name: Livingston County School District

Agency Contact: BJ Fern, DTC

Agency Contact Email: bj.fern@livingston.kyschools.us

Agency Contact Phone Number: wk 270.928.2659 fax 270.928.2454

Date of Notification to Agencies: Friday, 02/09/2018 Time of Notification: 9:00 a.m. CST

Date Breach Determined: 02/09/2018

Section 2

Complete this portion after the conclusion of the investigation regarding whether the Security Breach has resulted in or is likely to result in the misuse of personal information. Provide notice to agencies within 48 hours of completing investigation.

Personal Information Breached: ☒ Yes ☐ No

If Yes, Explain: A Special Payroll file containing first & last names & social security numbers of staff, was inadvertently posted on the district website attached to the School Board Agenda.

Total Number of Individuals Impacted: 268 Date Individuals Notified: 2/9/2018

Type of Notices Sent Out (select all that apply and provide explanations):

- ☐ Web Posting:
- ☐ Local or Regional Media:
- ☒ Letter:
- ☒ Email:
- ☐ Telephone:
- ☐ Other:

Stakeholders who had a school provided email or an email address on file were notified via email. All others w/o a school email address received a letter via USPS.

Did You Notify Consumer Credit Reporting Agencies? ☐ Yes ☒ No If Yes, Date: _____

Any Other Breach Compliance Requirements Apply such as Federal? ☐ Yes ☒ No

If Yes, Explain: _____

Third Party Breach: ☐ Yes ☒ No

If Yes, Third Party Name: _____

If Third Party Involved, When Did They Notify the Agency: _____

If a delay then please attach the delay notification record along with supporting documentation. Was there a delay due to:

- ☐ Law enforcement investigation. Reference to KRS 61.933 (3)(a)
- ☐ An agency determines that measures necessary to restore the reasonable integrity of the data system cannot be implemented within the timeframe established and will delay the breach determination. Delay will need to be approved in writing from the Office of the Attorney General. Reference to KRS 61.933 (3)(b)

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Section 3

Complete and submit at the conclusion of the investigation and any notice and resolution process.

Actions Taken to Resolve Breach:

Posted file deleted, stakeholders notified. District followed policies, procedures and KRS statutes. Offered monitoring protection for all stakeholders 5-yr period, utilized professional services for analysis of data breach, and Google cached files deleted.

Actions Taken to Prevent Additional Security Breaches in Future, if any:

Implement review procedure for all files prior to posting. Mandate training related to data security and risk management for all staff with annual remediation.

A General Description of what Actions are Taken as a Matter of Course to Protect Personal Data from Security Breaches:

Board reviews Data and Best Practices in August of each year. --Limited access (need-to-know)--Statewide product standards--locked data center and file cabinets--security settings on all workstations/servers--staff awareness security training via cloud based platform--centrally managed firewalls--web filtration--anti-virus--malware--spam/spyware protection (KETS/KDE)--patch and DDOS management--secure file transfer--AD/GP/Private IP implementation.

Any Quantifiable Financial Impact to the Agency Reporting the Security Breach:

District estimated cost of ID Shield per stakeholder for 5 years: \$160,000 Professional services \$1,400.

Reference:

KRS 61.931 to 61.934 - <http://www.lrc.ky.gov/Statutes/statute.aspx?id=43575>

KRS 42.726 - <http://www.lrc.ky.gov/Statutes/statute.aspx?id=43580>