



WYOMING
DEPARTMENT OF EDUCATION

*Creating Opportunities
for Students to Keep
Wyoming Strong*

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edu.wyoming.gov

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Security Incident Policy

Policy #: 4000-027

Version #: 2.0

Approved By: Jillian Balow, Superintendent, State of Wyoming
Department of Education

Effective Date: May 1, 2016

Purpose:

The purpose is to address security incidents.

The State of Wyoming, Department of Education (WDE) will create processes for the identification, reporting, and ensuring a timely response to real or potential violations of the security or a material breach of any part of WDE's security policy.

Scope:

This policy applies to all WDE workforce members including, but not limited to full-time employees, part-time employees, trainees, volunteers, contractors, temporary workers, and anyone else granted access to sensitive information by WDE. All workforce members are responsible for the security of protected information.

Policy:

WDE will maintain procedures for identifying security incidents. A security incident is any breach of security policy, or any activity that could potentially put sensitive information at risk of unauthorized use, disclosure, or modification.

A breach, as defined under Family Educational Rights and Privacy Act (FERPA), may have occurred if the incident involved student, teacher, and Personally Identifiable Information (PII) data. A breach includes the unauthorized acquisition, access, use, or disclosure of protected information as defined below, which compromises the security or privacy of such information, except where an unauthorized person to whom such information is disclosed would not reasonably have been able to retain such information. If a breach has occurred, members of the workforce must immediately follow the instructions in the Data Breach Discovery Policy, policy # 4000-004.

Incidents will be classified as "serious" or "non-serious." Non-serious incidents generally have the following characteristics:

- It is determined that there was no malicious intent (or the attack was not directed specifically at WDE associated with the incident and
- It is determined that no sensitive information was used, disclosed, or damaged in an unauthorized manner

Serious incidents generally have the following characteristics:

- It is determined that there was malicious intent and/or an attack was directed specifically at WDE



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- It is determined that sensitive information, including student, teacher, and PII, may have been used, disclosed, or damaged in an unauthorized manner or that this incident may be construed as a data breach

All workforce members of WDE will report any security incident to the Service Manager of which they become aware of or suspect as soon as practical.

WDE, with assistance and guidance from ETS, will maintain procedures for responding to serious and non-serious security incidents in order to prevent the escalation of the incident and to prevent future incidents of a similar nature.

Incidents characterized as serious by the Service Manager will be responded to immediately and reported to all upper-level management.

WDE, with assistance and guidance from ETS, will attempt to mitigate any harmful effects, when possible, where a security incident affects student, teacher, and/or PII information.

Responsibilities:

All individuals, groups, and organizations identified in the scope of this policy are responsible for:

- Staying aware of and identifying potential security incidents
- Reporting any suspected security incident to the Service Manager
- Assisting the Service Manager in ending the security breach and mitigating its harmful effects, if possible

The Service Manager is responsible for:

- Maintaining all security incident-related policies and procedures
- Characterizing all reported security incidents as “serious” or “non-serious” as per the guidelines outlined above. The Service Manager may take into account their professional expertise and experiences when making these characterizations
- Maintaining procedures for responding to security incidents
- Documenting all reported security incidents and their outcome

The WDE Information Security Officer (ISO) and other members of leadership are jointly responsible for:

- Mitigating, to the extent possible, any harmful effects of security incidents
- Deciding when it is appropriate to contact law enforcement officials about a security incident that has been characterized as serious
- The ISO is responsible for leading compliance activities that bring WDE into compliance with regulatory requirements.

Compliance:

Failure to comply with this or any other security policy will result in disciplinary actions as per HR Policy. Legal actions also may be taken for violations of applicable regulations and standards such as state and



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federal rules to include the Family Educational Rights and Privacy Act (FERPA).

Procedure(s):

- Security Incident Response Procedure
- Security Incident Documentation Procedure

Form(s):

- Computer Security Suspicious Event Form

References:

- The Family Educational Rights and Privacy Act (FERPA) (20 U.S.C. § 1232g; 34 CFR Part 99);
<http://www.ed.gov/policy/gen/guid/fpco/ferpa/index.html>

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