

# CASE STUDY



## Incident Summary

In July 2024, our client—an educational institution—experienced a data exposure incident. The study aims to:

- ✓ Analyze the incident and its impact
- ✓ Explore how student personal data (PII, PHI) can be better protected under FERPA



## Pre- and Post-Breach Measures

### A. Before the Breach

- Implemented a written data breach response policy
- Identified systems and locations storing sensitive data (PII, PHI)
- Monitored for data leakage risks
- Conducted regular privacy and security awareness training

### B. Responding to the breach

Our incident response included:

- Identifying exposed data (PII, PHI, etc.)
- Reviewing documents via an eDiscovery platform following legal counsel protocols
- Mitigating risks across hundreds of employees under legal review



## Data Security Process Followed

- 1** Reviewed and prioritized impacted data sets
- 2** Segregated 11+ populations for detailed analysis
- 3** Used a mix of tool-based and manual extraction
- 4** Performed deduplication, conflict checks, QC, QA, sampling, and pivot checks
- 5** Created notification lists per counsel guidance

## Compliance Framework

We adhered to:

- 1** FERPA (Family Educational Rights and Privacy Act)
- 2** PII (Personally Identifiable Information) protocols
- 3** PHI (Protected Health Information) safeguards

## Future Recommendations

Further research should:

- ✓ Analyze similar incidents across institutions
- ✓ Study additional regulatory compliance failures
- ✓ Examine cyber insurance, governance models, and cultural readiness

## Final Considerations

- ❑ The breach revealed gaps in security and compliance
- ❑ Stronger controls could have prevented unauthorized access and data exfiltration
- ❑ Our efforts ultimately secured potentially compromised data and raised security awareness.

## Conclusion

This breach review, supported by Aeren LPO, involved rapid turnaround to identify compromised data and notify affected individuals in a timely manner, per legal requirements.

