

[Draft] ASLP-IC Data Breach Plan

In the event that data in CompactConnect is breached, CompactConnect and associated organizations will do their best to notify affected groups and individuals and remedy the situation.

CompactConnect has automatic monitoring and alarms to notify personnel in case of a data breach. Highly sensitive data will be treated with greater urgency.

Note: If a commission’s authorize.net account is breached, this is the responsibility of the individual compact, and CompactConnect does not have any obligations.

Below is a table of the types of data stored in the system and how notifications will be handled after a breach is confirmed by the CompactConnect team.

Data type	Example	Who is notified	Notification timeframe	Notification method
Highly sensitive	Social Security Number	Compact directors	immediately	Text; email
		states; licensees	Within 24 hours	email
Personally identifiable information	Date of birth, address	Compact directors	Immediately	Text, email
		States; licensees	Within 24 hours	email
Military documentation	Accepted documents decided by each compact	Compact directors; licensees	Within 24 hours	email
Staff login information	Email, password	Compact directors; states	Within 24 hours	email
Licensee login information	Email, password	Compact directors; licensees	Within 24 hours	email
Public Information	License number, license expiration, etc	Compact directors; states; licensees	Within 24 hours	email

In the event of a data breach, it is useful to have prepared messages available to communicate about the event. This section covers both communication from the vendor to the commissions and from the commissions to the states/licensees.

From Vendor to Commissions

In the event of a breach, Brad Weber, Stacy Griffin, or Justin Frahm at InspiringApps will contact commission directors and the designated CSG contact as soon as the breach is confirmed, via both text and email.

ASLP Compact contact: Lesley Edwards-Gaither — legaither@aslpcompact.com; (949) 703-3955

Counseling Compact contact: Greg Searls — gsearls@clear-ams.org; (307) 631-4570

CSG contact: Isabel Eliassen — ieliassen@csg.org; (859) 760-8718

OT Contact: Amanda Perry — amanda@asmii.net; (337) 532-5484

Sample communication from InspiringApps/Vendor to commission directors in the event of a critical breach:

Alert! CompactConnect experienced a critical data breach. Our developers are working to prevent the breach from becoming worse. We will share details ASAP.

From Commissions to Licensees/States

Sample communication from Commission to affected party:

Audiology and Speech-Language Pathology Interstate Compact (ASLP-IC): NOTICE OF DATA BREACH

We are contacting you about a data breach that has occurred at ASLP-IC.

On [date], the compact experienced a breach of its data system, CompactConnect. The following types of information were affected: [logins, passwords, authorize.net credentials, SSN, PII, military docs, etc]. The following types of information were NOT affected: credit card or payment information, [passwords, military docs, etc].

As soon as we were alerted to the breach, we took action to prevent additional data from being affected. This included _____. For individuals who were affected, they will have to [re-create logins, other actions]. [If SSNs were impacted: We also recommend placing a free fraud alert on your credit file with any of the three major credit bureaus (Equifax, Experian, or TransUnion), and you may consider placing a credit freeze.]

For more information or future updates, you can visit ASLPCompact.com.

[Name/Signature]