### BO3. Protecting Student Data: The Facts, Stats, and Strategies for Preventing a Data Breach (Q&A)

**Question:**

Would it be possible to post the text of the Safeguards Rule condition that's part of the Title IV Program Participation Agreement Ts & Cs to the Cybersecurity section of the FSA Partners site? It would be helpful as a reference that institutional staff can point their colleagues to in order to understand the Safeguards Rule compliance obligation that's now inherent in the Title IV relationship.

**Response:**

SME – Lossing: FSA is working to develop an announcement for the GLBA Final Rule update and will have it posted to PartnerConnect soon.

**Response:**

Thanks, but I'm just talking about the actual text in the Title IV PPA that makes Safeguards Rule compliance a condition of the PPA. The Cybersec. section of the Partner Connect site provides a link to the PPA application, but not to the actual text of the agreement that shows what the Safeguards Rule provision of the PPA looks like. Many institutional administrators and staff may never see their institution's copy of its PPA, so being able to refer colleagues directly to the stock text of the specific provision would help people to connect the dots more quickly, as compared to finding someone with access to the institution's copy of the PPA, getting them to pull it out and find the relevant provision, etc.

**Question:**

Is there a particular way to connect FSA with the CIO community? So our CIO's are getting information from you?

**Response:**

SME – Lossing: If you reach out to fsaschoolcybersafety@ed.gov and ask to be a part of our Cybersecurity Newsletter, we’d be happy to add you to our communications.

**Response:**

Among its other outreach activities, I can say that FSA engages with the higher ed. CIO/CISO community through EDUCAUSE (educause.edu) on a regular basis. Building the relationship with the higher ed. IT community remains an ongoing effort, but the acting FSA CISO presented at the EDUCAUSE 2022 Annual Conference in late October, for example.

**Question:**

What if school doesn't know yet when the breach happened yet?

**Response:**

SME – Maxwell: If the school has detected a breach but does not know the exact date of the breach they should report as unknown or provide a best known estimate.

**Question:**

Does the support you provide in the case of a breach extend to foreign institutions?

**Response:**

Foreign schools that are enrolled in title IV programs get the same support as the domestic schools.

**Question:**

Did Dan say that FSA has had 65 incidents reported to it? What timeframe was that over, and how many Title IV institutions are there?

**Response:**

SME – Lossing: FSA sees an average of about 450 incidents per year. There are about 6000 Title IV institutions.

**Response:**

Thanks, I didn't think that I'd heard the incident stat correctly. How many of the reported incidents were actual breaches?

**Response:**

SME – Lossing: FSA does not provide a breakdown of incidents or breaches. Unauthorized Disclosure or Breach. The loss of control, compromise, unauthorized disclosure, unauthorized acquisition, unauthorized access, or any similar occurrence where (1) a person other than an authorized user accesses or potentially accesses student Title IV Information or (2) an authorized user accesses or potentially accesses student Title IV Information for an other than authorized purpose, whether physical or electronic.

**Question:**

What is the timeline for NIST SP 800-171 implementation?

**Response:**

SME – Lossing: The Department is working to determine a timeline for the implementation of NIST 800-171.