

**TO:** Henry County Board of Education (HCBOE)

**FROM:** Dr. Carl Knowlton, Interim Superintendent

**DATE:** July 15, 2024

**RE:** Final Academic and Operational Continuity Briefing – *ending July 11, 2024 (as of 5:00pm)* – following the expiration of the HCBOE Emergency Resolution No. 20231127

---

The following pages contain the **Academic and Operational Continuity Briefing for the dates of November 28, 2023-July 11, 2024**, with notations of the replacement procedures or processes to address disrupted business services of the school system, following the HCBOE Emergency Resolution No. 20231127 declaring a Local State of Emergency.

### **Current Incident Update**

#### **Objective 1: Identify the source, scope, and impact—if any—of the suspicious activity detected on the network the week of November 6, 2023.**

- Week of 11/6/23: Suspicious Activity detected and engaged with FBI, Homeland Security, third-party Cyber-Investigator, GEMA, HCEM, HCPD
- 11/9/23: Severed Network
- Source
  - 11/26/23: Suspicious Activity deemed an unauthorized user attempting to access HCS network with intent to do harm—confirmed cyber-incident
  - 11/30/23: Cyber-incident is deemed a ransomware attack initiated by criminal organization operating outside of the U.S.
- Scope
  - 11/26/23: Confirmed Infinite Campus, Finance and HR Platforms, Email, Microsoft 365, and Google environments secure and clean
  - 11/30/23: Confirmed unauthorized user successfully accessed a portion of the network where mostly historical files and procedural documents are stored.[date corrected as reported on 2/9/24]
  - 11/30/23: Accessed portion of network turned over to a data mining team. [date corrected as reported on 2/9/24]

- Impact

- 11/30/23: A portion of the HCS network was accessed by an unauthorized user but contents of this portion remains undefined. Content has been turned over to a data mining team secured by our insurance company who will conduct a thorough and comprehensive review of the contents to determine if any personally identifiable information is contained within. If that instance is discovered, proper legal notification and resources will be provided to the individual(s).\*
- 12/7/23: Data mining team work in progress; impact remains undefined at this time.
- 12/14/23: Data mining team work in progress; impact remains undefined at this time.
- 1/05/24: Data mining team work in progress; impact remains undefined at this time.
- 2/08/24: Data mining team work in progress; impact remains undefined at this time.
- 7/11/24: Data mining team finalizing review of the accessed portion of network to identify the individuals with contact information for appropriate legal notification concerning scope of personally identifiable information. A separate external vendor will be engaged to ensure appropriate legal notification is sent to each individual and resources are offered.

**Objective 2: Securely reconstruct and restore the network and network services to all HCS users (43,000 students / 6,000 employees / 1,000 additional endpoints)**

- Employees

- 11/29/23: Procurement Process
- 11/29/23: Infinite Campus, Google Classroom, Henry Connects
- 11/30/23: HCS Secure Network, DRC, EOPA, SLDS, GA learns and other outside assessment websites
- 12/6/23: Video retrieval functionality for school camera systems
- 12/6/23: PaddyNet
- 12/6/23: All high school staff password change
- 12/7/23: All elementary and middle school staff password change
- 12/7/23: All District level staff password change notification (effective on 12/8/23)
- 12/7/23: Launchpad (Classlink) and Illuminate
- 12/8/23: Online Microsoft Office 365, Go Guardian
- 12/13/23: Security Update Push to all staff and non-chromebook devices
- 12/18/23: Employee access to Etrieve
- 12/20/23: Secure storage of hotspots over winter break
- 1/4/24: Security Update push to all staff and non-chromebook devices

- 1/5/24: Internet Restoration Testing at initial school cluster
  - 1/9/24: HCS piloted full and open internet access to schools and district sites
  - 1/11/24: Internet access was restored to all high schools
  - 1/16/24: Internet access was restored to all schools throughout the district by January 16.
  - 1/24/24: Collection of Hotspots and Additional Chromebooks
- Students
    - 12/1/23: HCS Chrome Network, Infinite Campus, Google Classroom, Google Drive, Henry Connects
    - 12/8/23: Testing of Student password change protocol at Locust Grove Middle School
    - 12/11/23: All Middle and High School Impact students (except LGMS) password change/reset
    - 12/11/23: 3<sup>rd</sup>-5<sup>th</sup> Impact Academy students password change/reset
    - 12/13/23: All Middle and High School students (excluding LGMS and Impact Academy) password reset
    - 12/14/23: PK-2<sup>nd</sup> Grade student QR Code Password Reset
    - 12/14/23: New Student Account Creation
    - 1/5/24: 3<sup>rd</sup>-5<sup>th</sup> grade student Password Reset
    - 1/11/24: Internet access was restored to all high schools
    - 1/16/24: Internet access was restored to all schools throughout the district by January 16.

## **TABLE OF CONTENTS**

Academic Continuity	4
Operational Continuity	7
Incident Response Expenditures	10
Summary of Actions	10
Summary of Communications	14

# Academic Continuity

## **November 28- December 7, 2023**

- Adjustments have been made to the End-of-Course Exams for Winter administration, by updating the schedule. Communications prepared for families. Families of students at Impact Academy may change testing locations (to a home school) if transportation is needed given date changes. The Assessment Team is collaborating with each school to support rescheduling needs. (Policy IHE and Regulation BAB-R(1))
  - UPDATED Schedule
    - Monday, December 11, 2023: American Literature Part I
    - Tuesday, December 12, 2023: American Literature Part II/III
    - Wednesday, December 13, 2023: Algebra I
    - Thursday, December 14, 2023: Biology
    - Friday, December 15, 2023: US History
    - Monday, December 18, 2023 – Tuesday, December 19, 2023: Make-ups
- Separately, final examinations schedules are being adjusted by each high school to ensure students do not take both a Final Exam and EOC on the same date. EOC assessments should be prioritized throughout the testing period. It is recommended that high schools administer final exams for non-EOC courses on December 18 and 19 (full school days) and December 20 (early release day). (Policy IHE and Regulation BAB-R(1))
- Adjustments have been made to the Winter EOPA testing window and adjustments will be made by each High school. The internal administration of the EOPA testing window was originally scheduled to begin November 13, 2023 -December 1, 2023. However, due to the recent internet outage, the window for administration is being rescheduled to December 4, 2023- December 15, 2023 or January 8-12, 2024. To provide flexibility, school leaders may choose one of the following options:
  - Option 1: Administer EOPAs during the new fall testing window (December 4th-15th, 2023). If selected, careful scheduling is required to prevent interference and avoid scheduling conflicts with the EOC administration and final exams. Schools will need to update the testing schedule to share with the CTAE office.
    - If your schedule permits, it is most ideal and recommended that graduating seniors test the week of December 4th-8th. This will allow time for senior EOCs and final exams.
  - Option 2: Administer EOPAs after winter break (January 8th-12th, 2024). While this may require pulling students from 2nd-semester classes, this option will not disrupt EOC or final exams. Parents will need to be informed of this change and its impact on classes if this option is selected.
    - Seniors scheduled to graduate in December 2023 will need to take the EOPA during the December administration with the exception of Certiport.
  - Option 3: Schools may choose a hybrid approach and assess graduating seniors and students whose schedules allow in December 2023 and others January 8th-12th, 2024.
- In conjunction with each school's Test Coordinator (via Learning & Performance Division) and the Student Support Facilitator (via Exceptional Student Education Department), students with Accommodations on Winter assessments may be offered an alternate

testing site at the Henry County Learning and Support Center if necessary. (Policy IHE and Policy IDDF)

- There are several resources that schools should access, print, and proactively store hard copies to ensure that progress monitoring continues whether manual or through use of an application. In the event that a school/ case manager experiences disruption without access to FastBridge to complete progress monitoring for IEP goals and objectives or reevaluations, the SSF should assist the case manager in using the resources in the progress monitoring folder. All data should be stored and uploaded into IC once access becomes available. (Policy IDDF)
- Documenting IEP meetings and monitoring deadlines will continue by hand if digital resources are not available. In the event a school cannot access Infinite Campus to obtain and document IEP meetings a contingency process has been created. Case Managers will use PDF version of the following documents: IEP template, Eligibility report template, BIC request form, spot vision request process, MDR request process, 1:1 Nurse documentation log, records request procedures and progress monitoring procedures. If SSFs cannot access IC to monitor IEP deadlines, the information is included in their ESE notebook. SSFs should download the notebook to an excel spreadsheet to use. (Policy IDDF)
- The mid-year instructional resource collection for block schools has been adjusted and guidelines provided to schools in the event of continued disruption to network services. The process for collection includes the following guidance: Establish a team and ensure that all team members are familiar with the guidance, Documents should be created that allow for student and textbook information to be recorded, Use the format of your choice (Excel, Word, or any other reliable platform), All textbooks must be collected and checked in prior to December 20, 2023. Once network services are restored, record check-outs in Incident IQ. (Policy IFAA)
- Procedures and dates have been adjusted for the December 2023 Early Literacy Model and CFA assessment administration.  
Early Literacy Model: The Early Literacy Model combined module and winter benchmark assessment for Kindergarten, First and Second Grade is scheduled for December 14- 18. Teachers should proceed with administering the assessment during the scheduled assessment window.
  - If Illuminate is available by the assessment window, teachers should enter the assessment scores in the platform no later than Monday, December 18th at 5 pm.
  - If Illuminate is NOT accessible by this date (December 14-18), teachers should administer the assessment as they currently do and record student responses on the provided recording sheet to enter the Illuminate platform upon return from the semester break if or when it is available.
  - The assessments and recording sheets will be provided via email and sent to elementary principals and ELM contacts prior to the assessment window. Please retain hard copies of all paper/pencil assessment data.
- Common Formative Assessments: A Temporary Drive has been created that houses all student and teacher November and December formative and summative assessments, allowing teachers access to student and teacher editions of assessments. If paper/pencil CFAs are used, building leaders will need to put in place a plan for how assessments will be downloaded, distributed, and used by teachers. Alternatively, teachers may re-create CFAs (excluding web-based questions) and administer them using google forms. (Policy BAB)
- The Winter MAP growth assessment has been postponed. Further communication will be forthcoming once a revised MAP assessment schedule has been developed. (Policy IHE and Regulation BAB-R(1))

- Adjusted procedure for Psychological Services (evaluation and re-evaluations) have been created when there are network interruptions. This was also shared with Georgia Department of Education. If necessary, the school psychologists will test students using the test kits. School psychologists can use the hotspot at Henry County Learning and Support Center to score and send rating scales to teachers and parents. (Policy IDDF, 34 C.F.R. § 300.111; Georgia Bd of Education Rule 160-4-4-.03).

**December 8- 14, 2023**

- A semester 1 Final Exam Contingency Plan was shared internally with middle school and high school principals and math department chairs. An internal temporary Drive has been created that houses copies of district common final exams in the instance connection to Illuminate is disrupted. (Policy IHA-R (2))

Final Exam Contingency Plan:

- If teachers are unable to access district Semester 1 final exams in Illuminate, then the exams must be administered as paper and pencil assessments. Schools will develop a plan for printing and distributing student or class copies of the final exam if needed.
  - Some Illuminate online exams include web-based questions. Web-based questions will not appear on hard copies of teacher and student copies of final exams. Teachers should preview final exams to determine if web-based questions are included on the assessment.
  - If an assessment includes web-based questions, a school-level plan should be implemented to calculate grades by hand or devise another method to determine student performance. Students should be instructed not to answer web-based questions.
  - Teachers testing students in small groups with read-aloud accommodations should preview the final exam in preparation for reading the assessment to students.
- ESOL teachers and School Testing Coordinators will use district provided Chromebooks to prepare for and administer ACCESS testing to English Language Learners. ESOL teachers have been assigned a district-Chromebook to use for completing the WIDA Screener (needed as part of ESOL services eligibility determinations). The School Test Coordinator will also use this Chromebook to complete test preparation tasks in DRC/WIDA AMS, such as checking student registrations, manually entering missing students, and entering accommodations.
  - Student accommodations under Section 504 and associated meetings, evaluations and documentation will continue. On December 4, Georgia Department of Education was contacted regarding the Emergency Resolution and the updated procedures. (Policy JAA)  
Adjusted procedures for when network/internet service is unavailable:
    - Teachers serving students with Section 504 plans should consult the hard copy of the Section 504 plans if experiencing network interruption. Teachers must sign the acknowledgement form for receiving the hard copy Section 504 plan and keep a copy of the student's Section 504 plan confidential locked in a secure location.
    - Teachers can update the tracking form to document Section 504 accommodations if they have limited access to technology.
    - For Section 504 Meetings: If the school is experiencing technological difficulties, the Section 504 administrator will complete all required forms, invitations, and consents using a confidential digital storage drive, hardcopy document, or manual process to ensure mailings are sent to the parents and kept in a secure location.
    - For Evaluations: Hard copy forms can be used and placed in the confidential files, if digital forms are not accessible.

- The district office will fulfill any HS transcript requests via ScribOrder during November 1st-December 1st. Transcripts and student records can be released or uploaded via ScribOrder. Transcripts can be sent via GAFutures for any GAColleges and NCAA. (Policy JBCD-R (1), Policy JR, Policy IHA-R(2))
- Trauma Informed Educational Support Plans will continue. (House Bill 855, amending O.C.G.A. § 20-2-152.2)  
If there is interrupted network access, the following procedures will be followed:
  - The school social worker will contact all necessary parties via phone to schedule the meetings.
  - Meetings will take place via teleconference
  - Documented TIES forms will be delivered securely and directed to the Foster Care Liaison.
- Signs of Suicide (S.O.S.) intervention and prevention curriculum facilitation will continue using physical media (e.g. compact discs), if internet/network service is unavailable. (Policy JGJA, JGJA-E(1))
- Adjusted Procedures for interventions and progress monitoring have been shared for when network/internet access is unavailable. Paper-pencil solutions and resources are available to teachers in a temporary drive to support continuity of interventions and progress monitoring for System 44, Read 180, Math 180 and FastBridge. (Policy BAB-R(1))

#### **January 6- February 8, 2024**

- Adjusted Winter MAP assessment administration for all levels was adjusted to January 22- February 2, 2024. The Spring window will be as follows: Elementary and Middle—March 18-March 29, 2024; High—March 18- April 12, 2024. (Policy BAB-R(1))

#### **February 9- July 11, 2024**

- Academic processes have returned to regular operations

## Operational Continuity

#### **November 28- December 7, 2023**

- Family & Medical Leave Act (FMLA) procedures are slightly modified, as requests continue to be submitted electronically via hot spot or own employee internet connections. Alternate submission available via paper by the FMLA Office, including paper versions of medical certification forms. Approvals sent electronically, and hardcopy if needed. If documents are outstanding, phone calls to employees made by FMLA Office. Additional phone call reminders are being made by FMLA Office, as needed. (Policy and Regulation GBRIG)
- Reinstated processes for daily purchase orders, including retroactive POs affected by the network outage were shared with bookkeepers and requisition secretaries. Respective suppliers will receive requisitions from Nov. 8 – date by school bookkeepers. (Policy DJE)
- The 2023-24 TKES Fall Semester Observation Cycle has been adjusted. The December 15, 2023 deadline for Formative Evaluations

to be completed has been extended to January 15, 2024.

- ESE records requests are made electronically. In the event the district/ school experiences internet disruption, adjustments have been made. SSFs should contact via telephone their assigned administrative assistant in ESE to make an official request. The administrative assistant will reach out to the former school district and request the records. Records will be sent via USPS.(Policy IDDF)
- Adjusted procedures in instances where students, who do not pass the vision screening, may require the use of a spot vision assessment. SSFs will be able to access and complete a spot vision request form via hard copy in their folders. Once the form is completed it may be sent via interoffice mail or dropped off at the ESE office (Policy IDDF).
- Manual processing procedures for internal Title I requisition pre-approval processes and review and receipt processes were created for bookkeepers. (Policy DJE and DJE-R(1))
- Manual Title I payroll processing procedures were created. The Title I Payroll Processing Procedures illustrate the process Bookkeeper's are to follow for approval of payroll. Payroll timesheets and supporting documents are received from part-time staff who have provided Title I services during a specified pay period. Those documents are then reviewed for accuracy. To ensure alignment, a cover sheet which accounts for all staff requiring compensation for the stated pay period has to be completed. Those documents are then printed, saved to a thumb drive and both hand delivered to the Title I Program Facilitator on or before the monthly due date. This process ensures consistency, accuracy, and timeliness for Title I payroll approval.
- Adjusted procedures for mandated reporting/child abuse and neglect were shared internally with Principals, Assistant Principals and School level designees. This was also communicated with the Department of Family and Children Services. The primary method at this time for submitting DFCS Referrals will be via phone to 1-855-GA-CHILD. DFCS referrals made by phone will need to have the DFCS worker's name, date, and time of the call on the hard copy of the referral. The completed DHS Mandated Reporter Form with principal's signature must be sent by interoffice mail to the Student Services Department before the close of the business day. Once there is restored internet connectivity the Centralized DFCS Reporting Procedures will be followed as outlined in the Centralized DFCS Reporting Procedure document utilizing any of the three methods of submitting referrals (i.e. phone, email/electronic/portal). (Policy JGI and JGI (R))
- The window for administering the Georgia Student Health Survey (GSHS) has been extended for students, parents and all staff members. GSHS will still be administered to students grade 3-12, parents, and all staff members. The timeline for completion will be extended to February 2nd, 2024. MHWFs will work with admin/leadership team on new administration dates for school. School teams and district teams will track participation rates in January 2024. District and school teams will send out parent communication for parent survey in January 2024. (Policy JGJA).
- An adjusted procedure for health information and care so clinic aides have access to information on medical conditions and medications. Clinic Aides will use school hotspots to access IC for medical conditions and medicines. If there is a technology network interruption, the school's health service team will use classroom rosters for parent information. If there is a technology network interruption, the school's health service team will use the red notebooks for medicine and dosage. Cluster Nurses will print out health conditions for each school for clinic aides to access students' medical conditions/flags. Clinic Aides will document on paper the clinic



visits and medicine dosage if unable to access hotspots to enter in information into IC. (Policy JGCD and JGCD-R (1))

- Nurses are required to keep documentation of services rendered and make medical notes of how the students in their charge are doing daily. Nurse Service documentation procedures have been adjusted in instances when Infinite Campus is not accessible. Infinite Campus is the means that 1:1 Nurses document services rendered. However, if there is no internet access Nurses should write notes and keep them in a secure location. Once internet connectivity is restored Nurses should transfer the information into the IC platform. (Policy JGC, JGCD, JGCC, GANA, JGFGB, JAA, IDDF)

### **December 8- 14, 2023**

- The BASE (Before & After School Enrichment) District Office team will post fee assignments and payments until further notice due to BASE bookkeepers having limited access to Infinite Campus (IC).
- Safety drills should be conducted as scheduled. School administrators should utilize the intercom system if necessary. (O.C.G.A. § 20-2-209.1)
- Behavior referrals should be updated in Infinite Campus as soon as consequences are assigned. If the network/internet is unavailable at the time of the referral, school administrators may enter the referrals at a later date but no later than 5p on December 20, 2023. (HCBOE Code of Conduct)
- Adjusted procedures for grade repair have been communicated with High School Principals. Due to network connection issues, the grade repair and credit recovery window for 2nd semester has been adjusted to allow for additional time for both students and teachers to prepare. The Grade Repair window for all high schools will be January 16-30, 2024. (Policy IHE-R(2))
- Adjusted procedures for student attendance records have been implemented (Beginning Nov 9). Principals have either asked teachers to submit their written attendance to the school level Attendance Clerk for entry into Infinite Campus or to hold records and enter attendance once Infinite Campus is available. All student absences from November 9 to December 20, 2023 must be entered in Infinite Campus no later than 5pm on December 20, 2023. Student unexcused absence procedures are to be followed once data entry of student attendance has been completed at the school level. (Policy JBD-E(1))

### **February 9- July 11, 2024**

- Operational processes have returned to regular operations

# Incident Response Expenditures

**The following summary outlines the cumulative expenditures associated with the Cyber incident through July 11, 2024:**

Expenditure Class	Description	Obligated	Expensed
Cyber Response MDR + EDR Platform	Procurement of MDR and EDR services per Board Authorization on 11/27/23	\$717,590.40	\$717,590.40
Hotspots and other Cyber Response Platforms	Auxiliary platforms/subscriptions in support of internet access and increased security	\$128,271.68	\$128,233.43
Cyber Response & Data Discovery Services	External resource support for platform and network operations, as well, as data discovery efforts	\$387,431.99	\$385,320.49
Internal IT Staff Supplements	For extended services provided during weekends, holidays, and after standard work hours	\$34,986.25	\$34,986.25
Supplemental Expenses: Meals	On-site meals for IT support staff working extended hours	\$7,639.80	\$7,639.80
Transportation Adjustments	Vendor services to support route adjustments	\$1,200.00	\$1,200.00
<b>TOTALS</b>		<b>\$1,277,120.12</b>	<b>\$1,274,970.37</b>

## Summary of Actions

### **November 28- December 7, 2023**

- In a Special Called Meeting of the BOE on 11/27/2023, the BOE authorized HCBOE Emergency Resolution No. 20231127 declaring a local emergency and making provisions for adjusted school operations and district policies.
- A constituent services “Incident Response Team” has been assembled and members remain accessible for personalized [IncidentResponse@henry.k12.ga.us](mailto:IncidentResponse@henry.k12.ga.us) messaging. 1 message received to-date.
- The posting of legally required notices, i.e. the [Notice of Data Privacy Event](#), has included a standard message and the required distribution of best practices.
- In anticipation of upcoming organizational state and federal reporting requirements, the HCBOE Emergency Resolution No. 20231127

has been distributed for legal and departmental compliance communications with state and federal entities. For example, coordination is happening with federal and state points of contact for the upcoming submission for U.S. Department of Education Office of Civil Rights' Civil Rights Data Collection and the Georgia Department of Education has agreed to extended timelines for specific filings.

- Developed internal common memo coversheet for division/department reporting of policy-based replacement procedures or processes to address disrupted business services of the school system. Monitor submissions.
- Best practices research has been gathered from various school district across the country who faced ransomware cyber incidents within the last five years, including [Clark County School District in Las Vegas, NV](#) (Oct. 2023), [San Diego Unified School District, CA](#) (Nov. 2022), [Des Moines, IA](#) (Jan 2023), [Los Angeles, CA](#) (Sept 2022), [Las Cruces Public Schools, NM](#) (Oct. 2019), [Cedar Rapids School District, IA](#) (July 2022), [Albuquerque, NM](#) (Jan. 2022), [Glenwood Community School District, IA](#) (July 2019), [Linn-Mar Community School District](#) (Aug. 2022), [Little Rock School Board, AR](#) (Nov. 2022), [Prince George Co, MD](#) (Aug. 2023), [Chambersburg Area School District, PA](#) (Aug. 2023), and [New York City Department of Education](#) via one of their education products (Jan. 2022).
- Expert reports have been collected from the following sources:
  - U.S. Department of Justice Cybersecurity Unit [Best Practices for Victim Response and Reporting Cyber Incidents](#) (Sept 2018) and [Legal Considerations \(Feb 2020\)](#)
  - U.S. Government Accountability Office [Critical Infrastructure Protection: Additional Federal Coordination Is Needed to Enhance K-12 Cybersecurity \(Oct 2022\)](#), [Critical Infrastructure Protection: Education Should Take Additional Steps to Help Protect K-12 Schools from Cyber Threats \(Oct 2021\)](#), and [Recent Posts on Cyber attacks \(blog\)](#).
  - U.S. Cybersecurity and Infrastructure Security Agency (CISA) [report on Cross-Sector Cybersecurity Performance Goals \(updated Mar 2023\)](#)
  - SchoolSafety.Gov ["Cybersecurity Action Steps for the K-12 Community" \(Oct 2022\)](#) ... a shared initiative between the U.S. Department of Homeland Security (DHS), U.S. Department of Education (ED), U.S. Department of Justice (DOJ), and U.S. Department of Health and Human Services (HHS)
  - [U.S. Department of Education Office of Educational Technology, in partnership with the U.S. Cybersecurity and Infrastructure Security Agency \(Aug. 2023\)](#)
  - [The White House's National Cybersecurity Strategy report \(Mar 2023\)](#)
  - Leading industry source tracking K-12 Cyber Incidents <https://www.k12six.org/map> , a national non-profit organization.
- Review has been conducted of publicly reported ransomware recent trends, e.g. EdWeek (Aug. 17, 2023) [80% of school IT departments hit by ransomware](#) , The74 (Aug. 1, 2023) [Ransom payments backfired](#) , Cybersecurity Dive (Jan. 2023) [Ransomware hit U.S. schools at steady rate in 2022](#) .
- Continued coordination with insurer, engaged security partners, law enforcement, and emergency management agencies to effectuate mandated reporting requirements.

#### **December 8- 14, 2023**

- Continued availability of "Incident Response Team", assembled for personalized response messaging from [IncidentResponse@henry.k12.ga.us](mailto:IncidentResponse@henry.k12.ga.us) . 3 messages received to-date.

- Pursuant to Policy JR, adjusted parent records request protocols for in-person pickup of student records.
- Ensured individualized notices for timing adjustments under HCBOE Emergency Resolution No. 20231127 applicable to Policies and Regulations GAAA – Equal Opportunity Employment, GAE – Complaints and Grievances, GAEB – Harassment, IDFA - Gender Equity in Sports, JAA – Equal Educational Opportunities, JCAC – Harassment, JR – Student Records, JR-R(1) – Student Records, JRA – Student Data Privacy Complaints, and KN – Complaints.
- Garnered division/department feedback for alignment of policy-based replacement procedures or processes to address disrupted business services of the school system.
- Supported successful communications with file storage vendor for renewed accessibility to documents.
- Continued coordination with legal counsels and insurer, engaged security partners, law enforcement, and emergency management agencies to effectuate mandated reporting requirements.

**December 15, 2023 - January 5, 2024**

- Continued availability of “Incident Response Team”, assembled for personalized response messaging from [IncidentResponse@henry.k12.ga.us](mailto:IncidentResponse@henry.k12.ga.us) . No new messages since December 14, 2023; 3 messages received to-date.
- Continued individualized notices for timing adjustments under HCBOE Emergency Resolution No. 20231127 applicable to Policies and Regulations GAAA – Equal Opportunity Employment, GAE – Complaints and Grievances, GAEB – Harassment, IDFA - Gender Equity in Sports, JAA – Equal Educational Opportunities, JCAC – Sexual Harassment of Students, JR – Student Records, JR-R(1) – Student Records, JRA – Student Data Privacy Complaints, and KN – Complaints.
- Continued coordination with legal counsels and insurer, engaged security partners, law enforcement, and emergency management agencies to effectuate mandated reporting requirements.

**January 6 – February 8, 2024**

- Continued availability of “Incident Response Team”, assembled for personalized response messaging from [IncidentResponse@henry.k12.ga.us](mailto:IncidentResponse@henry.k12.ga.us) . No new messages since January 5, 2024; 3 messages received to-date since November.
- Continued individualized notices for timing adjustments under HCBOE Emergency Resolution No. 20231127 applicable to delineated complaints policies.
- Communicated with relevant authorities related to specific record requests and productions.
- Continued coordination with legal counsels and insurer, engaged security partners, law enforcement, and data mining team secured by our insurance company.

### **February 9, 2024- July 11, 2024**

- The BOE authorized HCBOE Emergency Resolution No. 20231127 declaring a local emergency and making provisions for adjusted school operations and district policies continued through school year 2023-2024 and expired on June 30, 2024.
- Continued individualized notices for timing adjustments under HCBOE Emergency Resolution No. 20231127 applicable to delineated complaints policies, through the expiration of the Resolution.
- The assembled constituent services “Incident Response Team” remained accessible for personalized IncidentResponse@henry.k12.ga.us messaging through school year 2023-2024. 4 messages received to-date since November.
- The posting of legally required notices, i.e. the [Notice of Data Privacy Event](#) including a standard message and the required distribution of best practices, remained through school year 2023-2024. Appropriate legal notification will be provided to individuals affected and resources offered once the information is finalized by the cybersecurity data mining team and vendor.
- Expert resources were acquired, reviewed and distributed to appropriate leaders, from the following sources:
  - U.S. Department of Education, Student Privacy Policy Office’s Privacy Technical Assistance Center, [videos on best practices](#) surrounding student privacy.
  - American Bar Association, continuous education session on “Cyber Threat Awareness and Creative Strategies for Managing Risk”.
- Elevated examination of overbroad, vague, or suspicious records requests to ensure compliance with Georgia Open Records Act and exemption from producing “[r]ecords the disclosure of which would compromise security against sabotage or criminal or terrorist acts and the nondisclosure of which is necessary for the protection of life, safety, or public property” per O.C.G.A. §50-18-72(a)(25)(A). Such records request examination continues as a practice.
- The HCS Vendor Agreement template language updated to include requirement for vendor cooperation and coordination during elevated security matters.
- Continued coordination with legal counsels and insurer, engaged security partners, data mining team and vendors to effectuate mandated reporting requirements.

# Summary of Communications

## **November 28- December 7, 2023**

- Centralized messaging on new “Cyber Incident Updates” [webpage](#), including videos and key points from prior employee, family, and community messages on Nov. 9, Nov. 10, Nov. 14, Nov. 16, Nov. 26, Nov. 30, and Dec. 7.
- Distribution of legal notice to community-circulated newspaper (i.e. legal organ) Henry Herald and website developed.
- Continued facilitation of Frequently Asked Questions for districtwide distribution.
- Facilitated media stories with the AJC (link to come), [WSB-TV](#), [11Alive](#), [Atlanta News First](#), and [Fox 5](#).

## **December 8- 14, 2023**

- Posted new videos to “Cyber Incident Updates” [webpage](#) on Dec. 7, Dec. 11, and Dec. 14.
- Added “Academic and Operational Continuity Briefing” on Dec. 8 to website.
- Facilitated media story with [AJC](#) was published on Dec. 14.

## **December 15, 2023- January 5, 2024**

- Follow-up correspondence with the AJC on January 4.

## **January 6 - February 8, 2024**

- HCS district website homepage adjusted to include cyber incident update icon in left navigation.

## **February 9- July 11, 2024**

- HCS district website homepage continues to include cyber incident link in the left navigation.