

January 14, 2025

To: Debbie Critchfield, Idaho Superintendent of Public Instruction Raul Labrador, Idaho Attorney General

RE: Powerschool Cybersecurity incident and impact on iSucceed Virtual Schools

Pursuant to Idaho Code Idaho Code § 28-51-105, which mandates notification to the Attorney General following a data breach affecting personal information, I am notifying you of a breach involving the iSucceed's PowerSchool Student Information System and the information we have so far as of January 14, 2025.

Nature of the Incident

As you are aware, on January 7, 2025, several Idaho districts who use the Student Information System, Powerschool were first made aware by Powerschool Group LLC about a data breach incident that happened in December 2024.

Our understanding from information provided to us is that PowerSchool detected the breach, they notified law enforcement, locked down the affected systems, and engaged the services of cybersecurity firms CrowdStrike and CyberSteward. PowerSchool has stated that they paid the threat actor not to release or disseminate the compromised data and received "reasonable assurances" from the threat actor that the data has been deleted and no additional copies exist. PowerSchool, along with its third-party cybersecurity contractors, continues to monitor the web for any evidence of data release.

iSucceed Virtual Schools Response

iSucceed Virtual School is a statewide online charter serving students across Idaho. In following our established <u>Cybersecurity & Data Breach Response Policy 9550</u> and with our small group of staff, we took the following action based on the information provided to us by Powerschool, SDE guidance and our policy/procedures:

1-7-25: Initial notification from Powerschool and Incident Team formed

1-7 to ongoing: **Technical Research by Incident Team** - iSucceed's team analyzed information given by Powerschool, analyzed access logs and connected systems as recommended by Powerschool, assessed security settings recommended from Powerschool, reviewed Powerschool forums information and State Department of Education guidance in order to establish a detailed plan.

1-8-25 to ongoing: **Began steps/action of data breach action plan** - iSucceed began work assessing the information presented to us, scope of those affected, notifications and related tasks in connected with third party data breach incidents, including by not limited;

- Incident report draft begins and all administration and Board notified.
- Later that week, Powerschool confirmed our data was affected and a student/staff notification template was provided by Powerschool. Templates were adjusted for audience and data affected to provide as much <u>verified</u> information as possible.
- Due to the vast volume of notifications involved, a reliable email tool was used in order to send the volume of email communications out to students, parents as staff and an applicable data breach notice was drafted. Email addresses were checked and verified.

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- Email notice to current/prior students, parents and staff via email listing the details and information, confirmed that iSucceed data was accessed by the breach and opportunity to ask immediate questions via an iSucceed support ticket. Additionally, stakeholders were told we would provide additional information as we receive it.
- Began gathering verified information to provide ICRIMP to determine next steps for insurance action based on information we have so far.
- Began draft of follow up plan in anticipation of additional information from Powerschool so that follow up emails can be sent with specific resources and instructions per Powerschools direction.

Categories of Data Affected

Friday January 10, 2025, staff received email confirmation that iSucceed data was accessed by the threat actor and provided a student/parent/staff email notification template from Powerschool. They indicated the breach may have exposed Personally Identifiable Information (PII) as defined by Idaho Code § 2851-104 and Idaho Code § 33-133. This may include the following:

- Names, addresses, and contact information for current and past students and staff;
- Life-safety, health, and grade information for current and former students;
- Parent/guardian/emergency contact names and addresses for current and past students.

While PowerSchool's investigation is ongoing, the iSucceed estimates that over 9,000 student records may have been affected. We are awaiting additional information and resources from Powerschool, in which they informed us would be provided January 17, 2025.

Legal and Regulatory Compliance

iSucceed is taking all necessary steps to comply with Idaho Code § 28-51105(1) and other applicable laws. Additionally, we are preparing for follow up steps dependent upon Powerschool's official course of action. We respectfully request your office's guidance on any additional actions required to ensure compliance with Idaho law and safeguard affected individuals' information. Additionally, we seek confirmation of any further steps your office recommends to address this incident.

Contact Information

We will continue to communicate transparently as information is available. We have directed concerned parties in our notifications to submit a support ticket at <u>iSucceed Support Ticket</u> for any initial questions in the interim.

Kathleen Allison Executive Director

Marcos Moncivais IT Supervisor

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