



Technology Security Plan

Noah Webster Academy has established this plan in order to support the maintenance and protection of scholar data and other education-related data or information that Noah Webster Academy stores, transmits, or otherwise manages by technology.

This plan is part of Noah Webster Academy's overall Data Governance Plan and follows the guidelines and requirements set forth in *Utah's Student Data Protection Act (SDPA)*, U.C.A §53A-1-1401 *et seq.* In addition, Noah Webster Academy conforms with all federal and state privacy and governance laws including the Family Educational Rights and privacy Act, 20 U.S. Code §1232g and 34 CFR Part 99 (hereinafter "FERPA"), the Government Records and Management Act U.C.A. §62G-2 (hereinafter "GRAMA"), U.C.A. §53A-1-1401 *et seq.* and Utah Administrative Code R277-487.

Purpose

The purpose of this plan is to identify the procedures for all individuals accessing and using Noah Webster Academy's Information Technology assets and resources and to ensure that all users abide by the prescriptions regarding the security of data stored digitally within the boundaries over which Noah Webster Academy has direct authority or contractual authority.

Technology Security

Noah Webster Academy supports a secure network system, including security for all personally identifiable information that is stored on paper or stored digitally on Noah Webster Academy-maintained computers and networks. This plan supports efforts to mitigate threats that may cause harm to Noah Webster Academy, its scholars, or its employees.

- Noah Webster Academy will ensure reasonable efforts to maintain network security.
- Noah Webster Academy acknowledges that data loss can be caused by human error, hardware malfunction, natural disaster, security breach, etc. and may not be preventable.
- All persons granted access to Noah Webster Academy's network and other technology resources are expected to be careful and aware of suspicious

communications and unauthorized use of Noah Webster Academy devices and the network.

- When an employee or other user becomes aware of suspicious activity, he/she must immediately contact a member of administration with the relevant information.
- Noah Webster Academy requires all third-party vendors/contractors that have access to critically sensitive data to sign a *Memorandum of Understanding Between Noah Webster Academy and Third-Party Vendors* before these vendors/contractors have access to Noah Webster Academy's systems or information.

Procedures

Definitions

Access: To directly or indirectly use, to attempt to use, to instruct, to communicate with, to cause input to, to cause output from, or otherwise to make use of any resources of a computer, computer system, computer network, or to use any means of communication with a computer, computer system, or computer network.

Authorization: Having the express or implied consent or permission of the owner, or of the person authorized by the owner, to give consent or permission to access a computer, computer system, or computer network in a manner not exceeding the consent or permission.

Computer: Any electronic device or communication facility that stores, retrieves, processes, or transmits data.

Computer System: A set of related, connected or unconnected, devices, software, or other related computer equipment.

Computer Network: The interconnection of communication or telecommunication lines between computers or computers and remote terminals; or the interconnection by wireless technology between computers or computers and remote terminals.

Computer Property: Electronic impulses, electronically produced data, information, financial instruments, software, or programs, in either machine or human readable form, and any other tangible or intangible item relating to a computer, computer system, computer network, and copies of any of the above.

Confidential Information: Data, text, or computer property that is protected by a security system that clearly evidences that the owner or custodian intends that it not be available to others without the owner's or custodian's permission.

Encryption or Encrypted Data: The translation of data into another form or code so that only people with access to a decryption key or password can access the data.

Personally Identifiable Information: Any data that may potentially identify a specific individual. Any information that can be used to distinguish one person from another and can be used for de-anonymizing anonymous data.

Security System: A computer, computer system, network, or computer property that has some form of access control technology, such as encryption, password protection, other forced authentication, or access control designed to keep out unauthorized persons.

Sensitive Data: Data that contains personally identifiable information.

System Level: Access to the system that is considered full administrative access, including operating system access and hosted application access.

Security Responsibility: Noah Webster Academy has appointed the school's administration as IT Security Officers responsible for overseeing Noah Webster Academy-wide IT security, to include the development of Noah Webster Academy's policies and adherence to the standards defined in this plan and related policies.

Training

- Noah Webster Academy shall ensure all employees who have access to sensitive information receive annual IT security training that emphasizes their personal responsibility for protecting scholar and employee information.
- Noah Webster Academy shall ensure all scholars are informed of Cyber Security Awareness.

Physical Security

Computer Security

Noah Webster Academy shall ensure any user's computer will not be left unattended and unlocked, especially when logged into sensitive systems or data, including scholar or employee information. Automatic log off, locks and password screen savers will be used to enforce this requirement. Noah Webster Academy shall also ensure all equipment containing sensitive information will be secured in order to deter theft.

Server/Network Room Security

Noah Webster Academy shall ensure that server rooms and telecommunication rooms/closets are protected by appropriate access control which segregates and restricts access from general school or office areas. Access control shall be enforced

using either keys, electronic card readers, or a similar method so that only those IT or other staff members having access necessary to perform their job functions are allowed unescorted access.

Telecommunication rooms/closets may only remain unlocked or unsecured when because of building design it is impossible to do otherwise or due to environmental problems that require the door to be opened.

Contractor Access

Before any contractor is allowed access to any computer system, server room, or telecommunication room, the contractor will need to present a company issued identification card, and his/her access will need to be confirmed directly by the authorized employee who issued the service request or by Noah Webster Academy's administration.

Network Security

Network perimeter controls will be implemented to regulate traffic moving between trusted internal (Noah Webster Academy) resources and external, untrusted (Internet) entities. All network transmission of sensitive data will include encryption where technologically feasible.

Network Segmentation

Noah Webster Academy shall ensure all untrusted and public access computer networks are separated from its main computer network and will utilize security policies to ensure the integrity of those computer networks. Noah Webster Academy will also utilize industry standards and current best practices to segment internal computer networks based on the data they contain. This action will be taken to prevent unauthorized users from accessing services unrelated to their job duties and to minimize potential damage from other compromised systems.

Wireless Networks

No wireless access point shall be installed on Noah Webster Academy's computer network that does not conform with current network standards as determined by school administration. Any exceptions to this must be approved directly in writing by the Executive Director. Noah Webster Academy shall scan for and remove or disable any rogue wireless devices on a regular basis. All wireless access networks shall conform to current best practices and shall utilize at minimal WPA encryption for any connections. Open access networks are not permitted, except on a temporary basis when deemed necessary.

Remote Access

Noah Webster Academy shall ensure that any remote access with connectivity to Noah Webster Academy's internal network is achieved using the Noah Webster Academy's centralized VPN service that is protected by multiple factor authentication systems. Any exception to this plan must be due to a service provider's technical requirements and must be approved by administration.

Access Control

System and application access will be granted based upon the least amount of access to data and programs required by the user in accordance with a business "need-to-have" requirement.

Authentication

Noah Webster Academy shall enforce strong password management for employees, scholars, and contractors.

- Password Creation: All server system-level passwords must conform to the password construction guidelines determined by administration as per the Data Governance Plan.
- Password Protection: Passwords must not be shared with anyone. All passwords are to be treated as sensitive, confidential information.
- 2-Step Verification is required for all Noah Webster Academy staff accounts.
- Passwords must not be inserted into email messages or other forms of electronic communication.
- Passwords must not be revealed over the phone to anyone.
- Passwords may not be revealed on questionnaires or security forms.
- The content or format of passwords may not be disclosed in an insecure communication or as a hint.
- Any user suspecting that his/her password may have been compromised must report the incident and change all passwords.

Authorization

Noah Webster Academy shall ensure user access will be limited to only those specific access requirements necessary for employees to perform their jobs. Where possible, segregation of duties will be utilized to control authorization access. Noah Webster Academy shall ensure that user access will be granted and/or terminated upon timely receipt, and the Administration's approval, of a documented access request/termination.

Accounting

Noah Webster Academy shall ensure that audit and log files are maintained for at least ninety days for all critical security-relevant events such as invalid logon attempts, changes to the security plan/ configuration, and failed attempts to access objects by unauthorized users, etc.

Administrative Access Controls

Noah Webster Academy shall limit IT Administrator privileges (operating system, database, and applications) to the minimum number of staff required to perform these sensitive duties.

Incident Management

Noah Webster Academy will design its monitoring and response to IT related incidents to provide early notification of events and rapid response and recovery from internal or external network or system attacks.

Business Continuity

To ensure continuous critical IT services, Noah Webster Academy will develop a business continuity/disaster recovery plan appropriate for the size and complexity of Noah Webster Academy IT operations. Noah Webster Academy shall also develop and deploy a district-wide business continuity plan which should include as a minimum:

- Backup Data: Procedures for performing routine daily/weekly/monthly backups and storing backup media at a secured location other than the server room or adjacent facilities. As a minimum, backup media must be stored off-site a reasonably safe distance from the primary server room.
- Secondary Locations: Identify a backup processing location.
- Emergency Procedures: Document a calling tree with emergency actions to include recovery of backup data, restoration of processing at the secondary location, and generation of scholar and employee listings for ensuring a full head count of all scholars.

Malicious Software

Server and workstation protection software will be deployed to identify and eradicate malicious software attacks such as viruses, spyware, and malware.

- Noah Webster Academy shall install, distribute, and maintain spyware and virus protection software on all district-owned equipment, i.e. servers, workstations, and laptops.
- Noah Webster Academy shall ensure malicious software protection will include frequent update downloads (minimum weekly), frequent scanning (minimum weekly), and that malicious software protection is in active state (real time) on all operating servers/workstations.
- Noah Webster Academy shall ensure all security-relevant software patches (workstations and servers) are applied within thirty days and critical patches shall be applied as soon as possible.

- Noah Webster Academy will ensure all computers use Noah Webster Academy's approved anti-virus solution.
- Any exceptions this section must be approved by school administration.

Internet Content Filtering

In accordance with Federal and State Law, Noah Webster Academy shall filter internet traffic for content defined in law that is deemed harmful to minors.

- Noah Webster Academy acknowledges technology-based filters are not always effective at eliminating harmful content and, therefore, Noah Webster Academy uses a combination of technological means and supervisory means to protect scholars from harmful online content.
- Noah Webster Academy provides a technology based filtering solution for Noah Webster Academy devices that scholars in assigned grades take home.
- Noah Webster Academy personnel supervise scholars when they access the internet using Noah Webster Academy-owned devices on school property.
- Noah Webster Academy relies on parents to provide the physical supervision necessary to protect scholars from accessing harmful online content at home.

Data Privacy

Noah Webster Academy considers the protection of the data it collects on scholars, employees and their families to be of the utmost importance.

- Noah Webster Academy protects scholar data in compliance with the Family Educational Rights and privacy Act, 20 U.S. Code §1232g and 34 CFR Part 99 ("FERPA"), the Government Records and Management Act U.C.A. §62G-2 ("GRAMA"), U.C.A. §53A-1-1401 et seq., 15 U.S. Code §§ 6501–6506 ("COPPA"), and Utah Administrative Code R277-487 ("Student Data Protection Act").
- Noah Webster Academy shall ensure access to employee records shall be limited to only those individuals who have specific access requirements necessary to perform their jobs. Where possible, segregation of duties will be utilized to control authorization access.

Security Audit and Remediation

Noah Webster Academy shall perform routine security and privacy audits in congruence with the Noah Webster Academy Data Governance Plan. Noah Webster Academy personnel shall develop remediation plans to address identified lapses in accordance with Noah Webster Academy Information Security Remediation Plan.

Employee Disciplinary Actions

Employee Disciplinary Actions shall be in accordance with applicable laws, regulations and Noah Webster Academy policies. Any employee found to be in violation of this plan or related policies may be subject to disciplinary action up to and including termination of employment with Noah Webster Academy.