

UNIVERSITY OF HAWAI‘I SYSTEM REPORT



REPORT TO THE LEGISLATURE

Report on Personal Information Security Breach Notification
at Kapi'olani Community College
July 1, 2011

HRS 487N-4

August 2011

REPORT TO THE LEGISLATURE ON DATA EXPOSURE AT THE UNIVERSITY OF HAWAI'I

DISCOVERY OF DATA EXPOSURE: July 1, 2011

LOCATION OF DATA EXPOSURE: Kapi'olani Community College

NATURE OF DATA EXPOSURE: Paper Files with Sensitive Information Reported Missing From Secure Storage Area

INCIDENT DESCRIPTION:

On July 1, 2011, campus employees reported that boxes of paper files containing personal information were missing from a secured storage area. These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

The records were being securely retained pursuant to state and university records retention policies (Administrative Procedure No. A8.450 Records Management, University of Hawai'i and General Records Schedules, State of Hawai'i Department of Accounting and General Services Archives Division) and there was no indication of forced entry. The campus immediately began an internal investigation to attempt to locate the missing records and to identify the individuals whose records were in the boxes. The boxes were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes. A report was made to the Honolulu Police Department on July 8 and a Private Investigator was retained by the University to assist in this matter. Both investigations are still ongoing.

Approximately 1,961 individuals have been identified as potentially at-risk. Notification letters have been sent to the last known postal addresses on record with the University. Individuals identified as at- risk include:

- Those who made requests for transcripts by mail or phone with credit card payments processed during the period of February 6, 2010, to June 30, 2010,
- Those who made credit card payments by mail or phone of nonresident application fees processed during the period of February 6, 2010, to June 30, 2010,
- Those who registered by phone, mail, or fax for non-credit (continuing education) courses with credit card payment during the period of July 1, 2010, to November 3, 2010, and
- Those who requested a credit card payment refund by phone, mail, or fax for non-credit (continuing education) courses during the period of July 1, 2010, to November 3, 2010.

In the notification letters, potentially affected individuals were provided information about identity protection. They were also informed that the campus is exploring a contract for credit monitoring services and were advised to contact Kapi'olani if their identity or accounts have been compromised.

Web pages were created to provide detailed information to at-risk individuals and the public, including information about protecting against or dealing with identity theft. The web pages can be viewed at <http://www.kcc.hawaii.edu/object/idalert.html>. A campus telephone contact and email account were established to handle inquiries by concerned individuals.

UH will update its record retention policies to make it clear that record retention practices require protection of PII by redacting PII from all archival retained paper records and encrypting PII from all archival electronic retained records.

ATTACHMENTS:

Attachment A: Notification letter to affected individuals

Attachment B: Kapi'olani Community College ID Alert website including FAQs

Attachment C: Campus Action Plan



UNIVERSITY of HAWAI'I®
KAPI'OLANI
COMMUNITY COLLEGE

ATTACHMENT A
Office of the Chancellor

[Recipient's Name]
[Address]
[City, State, Zip]

August 10, 2011

Dear [Recipient's Name]:

We are contacting you to inform you of a recent incident that may put you at risk for identity theft and to provide guidance on how you can protect yourself from financial harm associated with this and other potential risks.

On July 1, 2011, campus employees reported that boxes of paper files containing personal information were missing from a secured storage area. These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

The records were being securely retained pursuant to state and university records retention policies (Administrative Procedure No. A8.450 Records Management, University of Hawai'i and General Records Schedules, State of Hawai'i Department of Accounting and General Services Archives Division) and there was no indication of forced entry. The campus immediately began an internal investigation to attempt to locate the missing records and to identify the individuals whose records were in the boxes. The boxes were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes. A report was made to the Honolulu Police Department on July 8 and a Private Investigator was retained by the University to assist in this matter. Both investigations are still ongoing.

At this time, we do not know whether or not the documents were taken for malicious purposes; nonetheless, Kapi'olani Community College takes this incident seriously and is exploring a contract for credit monitoring services.

Individuals receiving this notice and identified as at risk include:

- Those who made requests for transcripts by mail or phone with credit card payments processed during the period of February 6, 2010, to June 30, 2010,
- Those who made credit card payments by mail or phone of nonresident application fees processed during the period of February 6, 2010, to June 30, 2010,
- Those who registered by phone, mail, or fax for non-credit (continuing education) courses with credit card payment during the period of July 1, 2010, to November 3, 2010, and
- Those who requested a credit card payment refund by phone, mail, or fax for non-credit (continuing education) courses during the period of July 1, 2010, to November 3, 2010.

4303 Diamond Head Road
Honolulu, Hawai'i 96816-4421
Telephone: (808)734-9565
Facsimile: (808)734-9162
Website: www.kcc.hawaii.edu
An Equal Opportunity/Affirmative Action Institution

Potentially affected individuals are also encouraged to take routine protective measures against identity theft which include:

- Obtaining and carefully reviewing credit reports. Free credit reports from all three credit agencies (Equifax, TransUnion, and Experian) may be requested at <http://www.annualcreditreport.com> or by calling 877-322-8228.
- Reviewing bank and credit card statements regularly and looking for unusual or suspicious activities.
- Contacting appropriate financial institutions immediately upon noticing any irregularities in a credit report or account.

If your identity or accounts have been compromised, please contact us as soon as possible; you may also take actions such as requesting refunds, closing accounts, and placing your credit records in a state of "fraud alert" or "freeze."

We apologize for any inconvenience this incident may cause. If you have questions or need additional information, you may email kccalert@hawaii.edu, call (808) 734-9513 on weekdays between 8:00 a.m. and 4:30 p.m., or go to <http://www.kcc.hawaii.edu/object/idalert.html>.

Sincerely yours,



Leon Richards
Chancellor



UNIVERSITY of HAWAII®
KAPI'OLANI
COMMUNITY COLLEGE

4303 Diamond Head Road
Honolulu, Hawai'i 96816-4421
Telephone: (808)734-9565
Facsimile: (808)734-9162
Website: www.kcc.hawaii.edu
An Equal Opportunity/Affirmative Action Institution

KCC ID Alert

About KCC

Accreditation, Mission Statement, Administration, Maps, Tours, History & Facts, Giving, Visiting KCC, ...

Academics

Programs of Study, Courses, Catalog, Calendars, Special Programs, ...

Admissions

Admissions, Assessment & Testing, Dates & Deadlines, Tuition, Getting Started, ...

Services

Registration Guide, Financial Aid, Academic Advising & Counseling, Disability Services, Campus Services, Emergency Procedures, Kahikoluamea Center, CELTT, ...

Libraries and Computers

Lama Library, Computers on Campus, Online Tools, Technology Resources, ...

International Resources

International Students, Study Abroad, Short-Term Training Program, ...

Life at KCC

Koa Gallery, Health & Safety, Food & Dining, Kapio - Student Newspaper, Student Activities, Student Congress, ...

Bookstore

KCC Bookstore, UH Bookstore Computer Department

Continuing Education

Data Exposure Reported at Kapi'olani Community College

On July 1, 2011, campus employees reported that boxes of paper files containing personal information were missing from a secured storage area. These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

The records were being securely retained pursuant to state and university records retention policies (Administrative Procedure No. A8.450 Records Management, University of Hawaii and General Records Schedules, State of Hawaii Department of Accounting and General Services Archives Division) and there was no indication of forced entry. The campus immediately began an internal investigation to attempt to locate the missing records and to identify the individuals whose records were in the boxes. The boxes were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes. A report was made to the Honolulu Police Department on July 8 and a Private Investigator was retained by the University to assist in this matter. Both investigations are still ongoing.

At this time, we do not know whether or not the documents were taken for malicious purposes; nonetheless, Kapi'olani Community College takes this incident seriously and is exploring a contract for credit monitoring services.

Notification letters have been sent to the last known postal addresses on record with the University. Individuals identified as at-risk include:

- Those who made requests for transcripts by mail or phone with credit card payments processed during the period of **February 6, 2010, to June 30, 2010,**
- Those who made credit card payments by mail or phone of nonresident application fees processed during the period of **February 6, 2010, to June 30, 2010,**
- Those who registered by phone, mail, or fax for non-credit (continuing education) courses with credit card payment during the period of **July 1, 2010, to November 3, 2010,** and
- Those who requested a credit card payment refund by phone, mail, or fax for non-credit (continuing education) courses during the period of **July 1, 2010, to November 3, 2010.**

Potentially affected individuals are also encouraged to take routine protective measures against identity theft which include:

- Obtaining and carefully reviewing credit reports. Free credit reports from all three credit agencies (Equifax, TransUnion, and Experian) may be requested at <http://www.annualcreditreport.com> or by calling 877-322-8228.
- Reviewing bank and credit card statements regularly and looking for unusual or suspicious activities.
- Contacting appropriate financial institutions immediately upon noticing any irregularities in a credit report or account.

If your identity or accounts have been compromised, please contact us as soon as possible; you may also take actions such as requesting refunds, closing accounts, and placing your credit records in a state of "fraud alert" or "freeze."

We apologize for any inconvenience this incident may cause. [If you have questions](#) or need additional information, you may email kccalert@hawaii.edu, call **(808) 734-9513** on weekdays between 8:00 a.m. and 4:30 p.m.

Related Links

- [Federal Trade Commission ID Theft Site](#)
- [US Department of Education ID Theft Information](#)
- [Social Security Administration Info on Theft ID](#)
- [Privacy Rights Clearinghouse](#)
- [Identity Theft Resource Center](#)

Frequently Asked Questions Relating to Data Exposure

Q: What happened?

A: On July 1, 2011, campus employees reported that boxes of paper files containing personal information were missing from a secured storage area. The campus immediately began an internal investigation to attempt to locate the missing records and to identify the individuals whose records were in the boxes. There was no sign of forced entry into the storage area and the boxes were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes.

Q: How did this happen?

A: The records were being securely retained pursuant to state and university records retention policies (Administrative Procedure No. A8.450 Records Management, University of Hawai'i and General Records Schedules, State of Hawai'i Department of Accounting and General Services Archives Division). On July 1, 2011, campus employees reported that boxes of paper files containing personal information were missing from a secured storage area. There was no sign of forced entry into the storage area and the boxes containing the records were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes.

Q: When did this incident occur?

A: Boxes containing paper files with personal information were reported missing on July 1, 2011.

Q: Why was there a delay between the incident and notifying me that this happened?

A: After the boxes were reported missing, the campus immediately began an internal investigation to attempt to locate the missing records and to identify the individuals whose records were in the boxes. The boxes were initially thought to have been moved by some authorized employee for official business. Subsequent interviews with employees and physical searches of storage rooms and offices failed to turn up the boxes. On July 14, the case was made a matter of official record with the Honolulu Police Department. In addition, a Private Investigator has been retained by the University to assist in this matter. While both investigations are still ongoing, the campus felt it prudent to notify individuals whose records are missing.

Q: Whose information was compromised?

A: Individuals receiving this notice and identified as at risk include:

- Those who made requests for transcripts by mail or phone with credit card payments processed during the period of February 6, 2010, to June 30, 2010,
- Those who made credit card payments by mail or phone of nonresident application fees processed during the period of February 6, 2010, to June 30, 2010,
- Those who registered by phone, mail, or fax for non-credit (continuing education) courses with credit card payment during the period of July 1, 2010, to November 3, 2010, and
- Those who requested a credit card payment refund by phone, mail, or fax for non-credit (continuing education) courses during the period of July 1, 2010, to November 3, 2010.

Q: What specific information was in the missing files?

A: These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

Q: Was there any employment application data in the missing files?

A: No employment application data was in the files.

Q: Did the missing files contain any information about my phone number(s), my billing address, or other information about me?

A: These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

Q: Was any credit card information exposed?

A: These paper documents contained information necessary for processing of payments for official KCC business transactions, including some combination of name, address, phone number, social security number, and/or credit card information.

Q: How many people were impacted?

A: Approximately 1,961 individuals have been identified as potentially at-risk.

Q: Why was this information stored?

A: The records were being securely retained pursuant to state and university records retention policies (Administrative Procedure No. A8.450 Records Management, University of Hawai'i and General Records Schedules, State of Hawai'i Department of Accounting and General Services Archives Division).

Q: Do you suspect that my information has been used fraudulently?

A: We do not know, but we take our obligation to help you protect your information very seriously, and deeply regret that this has happened.

Q: Has anyone been adversely affected as a result of this incident?

A: We do not know at this time.

Q: Have law enforcement authorities been notified?

A: A report was made to the Honolulu Police Department on July 8 and a Private Investigator was retained by the University to assist in this matter. Both investigations are still ongoing.

Q: What is the campus doing to protect the identity of those whose data was exposed?

A: Kapi'olani Community College is exploring a contract for credit monitoring services.

Q: What is the campus doing to prevent future data exposure?

A: Kapi'olani Community College has taken steps to ensure that a similar incident does not recur. Files with personal information were relocated to a more secure location immediately after the July 1 incident report. In the future, the campus may provide centralized, secure, and monitored storage for all paper records containing personal information.

Q: How will affected individuals be notified?

A: Letters to affected individuals were mailed on August 11, 2011 and should be received as soon as August 12, 2011.

Q: If I did not receive a notification letter, does that mean my information was not exposed?

A: Not necessarily. Notification letters have been sent to the last known postal addresses on record with the University; individuals whose addresses are not up-to-date may not receive them. If you are in the group identified as at-risk but did not get a letter, you may call (808) 734-9513 on weekdays between 8:00 a.m. and 4:30 p.m., to find out if you are on the list of potentially affected individuals.

Q: What should affected individuals know and do?

A: Potentially affected individuals are also encouraged to take routine protective measures against identity theft which include:

- Obtaining and carefully reviewing credit reports. Free credit reports from all three credit agencies (Equifax, TransUnion, and Experian) may be requested at <http://www.annualcreditreport.com> or by calling 877-322-8228.
- Reviewing bank and credit card statements regularly and looking for unusual or suspicious activities.
- Contacting appropriate financial institutions immediately upon noticing any irregularities in a credit report or account.

If your identity or accounts have been compromised, please contact us as soon as possible; you may also take actions such as requesting refunds for unauthorized transactions, closing accounts, and placing your credit records in a state of "fraud alert" or "freeze."

Q: How can I get more information?

A: If you have questions or need additional information, you may email kccalert@hawaii.edu, call (808) 734-9513 on weekdays between 8:00 a.m. and 4:30 p.m., or go to <http://www.kcc.hawaii.edu/object/idalert.html>.



UNIVERSITY of HAWAII®
KAPI'OLANI
COMMUNITY COLLEGE

Office of the Chancellor

CAMPUS ACTION PLAN FOLLOWING JULY 2011 DATA EXPOSURE

In addition to the mandated actions following this incident, i.e., notification of students, Kapi'olani Community College has taken or plans to take the following actions:

1. Explore a Contract to Provide Credit Monitoring Services to Affected Individuals

The campus is exploring credit monitoring and identity protection services for affected individuals. If this service is provided by the college, a follow up letter with enrollment information will be sent to all affected individuals.

2. Evaluate Data Storage Practices of the Business Office and Institute Changes as Needed

Files with PII were relocated to a more secure location immediately after the July 1 incident report. In the future, the campus may provide centralized, secure, and monitored storage for all paper records containing PII.

3. Evaluate Records Handling and Retention Practices of the Entire Campus

An audit of practices related to the day-to-day handling of records containing PII as well as their short-term and long-term storage will be performed for all campus units. Results of the inventory of these practices will be used to determine appropriate follow up actions.

4. Provide Training for Data Custodians on Secure Records Handling and Retention

Data custodians will be retrained in safe handling of records on a day-to-day basis as well as university/state records retention policies. Mandatory training for data custodians will be provided on a regular basis.

4303 Diamond Head Road
Honolulu, Hawaii 96816-4421
Telephone: (808)734-9565
Facsimile: (808)734-9162
Website: www.kcc.hawaii.edu

An Equal Opportunity/Affirmative Action Institution