



ACTFORE and Precision Restored in Multi-State Education Breach Response

SUMMARY

A multi-state education organization facing regulatory and reputational risk

A U.S.-based education provider serving approximately 30,000 students annually across K-12 and adult education programs experienced a data security incident that potentially exposed sensitive student and administrative records across 27 U.S. states. Because the organization operates within a highly regulated environment, the implications extended well beyond technical remediation. Leadership needed clarity on scope, jurisdictional impact, and notification obligations.

When early analysis created more uncertainty than answers

An initial Phase 1 analysis had already been completed prior to ACTFORE's involvement. While intended to accelerate response, the results flagged an unusually large portion of the dataset as responsive. Rather than providing confidence, the output raised new questions around accuracy, cost, and the risk of over-notification. With timelines tightening and downstream decisions looming, the organization needed a partner capable of restoring precision and control without delaying regulatory response. ACTFORE was engaged to do exactly that.

RESULTS

~205,000 files processed

179,408 impacted individuals

27 States impacted

CUSTOMER DETAILS

Education (K-12 & Adult Education)

Students Served: ~30,000 annually

Headquarters: United States (California)

COUNSEL

NLJ 500

PRODUCTS USED

- BOXER
- CLARITY
- DISCOVER

THE CHALLENGE

Over-identification at scale introduced compounding risk

By the time ACTFORE was brought into the engagement, approximately 205,000 files had been identified as responsive by another vendor. While conservative on its face, this approach shifted substantial risk downstream. Inflated review volumes increased costs, prolonged timelines, and raised the likelihood that individuals would be notified unnecessarily—an outcome that carries real consequences in an education context where trust and transparency are paramount.

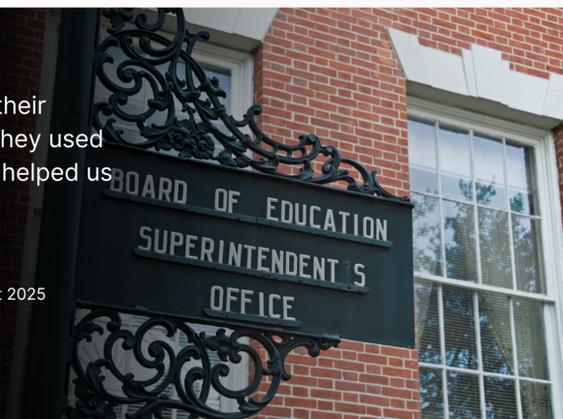
Beyond operational strain, over-identification complicated regulatory analysis. Without a reliable signal distinguishing material exposure from incidental references, legal and compliance teams were left navigating uncertainty across dozens of jurisdictions, each with its own notification thresholds and expectations.

The need to correct course without restarting the clock

Despite these challenges, restarting the engagement was not an option. Regulatory timelines were already in motion, and leadership needed defensible answers quickly. The task was to repair the analytical foundation mid-stream—reducing noise, restoring accuracy, and ensuring that every downstream decision would be supported by evidence rather than assumption.

“We were blown away by their abilities; the technology they used was really advanced and helped us achieve our goals.”

Client
Chambers | Crisis & Risk Management 2025



THE ACTFORE APPROACH

Re-establishing accuracy through full re-indexing

ACTFORE began by re-indexing the entire dataset rather than relying on prior conclusions. All 205,000 files were reprocessed using refined programmatic logic designed to identify material exposure with greater precision. A tailored extraction framework covering 50 regulated data elements was applied to ensure that responsiveness was assessed consistently across all jurisdictions.

This approach immediately corrected over-identification. Of the roughly 205,000 files previously flagged, ACTFORE confirmed that only 89,198 files warranted further review—a reduction of more than 56% before detailed data extraction began. By narrowing scope early, ACTFORE reduced cost exposure and prevented unnecessary escalation.

Structured review with defensibility built into every decision

Following re-indexing, ACTFORE executed a fixed-price manual review focused on validation, deduplication, and enrichment. Files were assessed against regulatory requirements and refined based on client-specific needs, ensuring that results aligned with notification standards across all impacted states.

Throughout the engagement, ACTFORE maintained close coordination with stakeholders to validate methodology and confirm decision thresholds. The result was a clear, defensible foundation for response—one that allowed the organization to move forward with confidence, meet its obligations, and protect the communities it serves.

UNMATCHED PRECISION AND EXECUTION

Of the approximately 205,000 files previously identified as responsive, ACTFORE confirmed that only 89,198 warranted review. Correcting over-identification early reduced review volume, cost exposure, and unnecessary escalation before manual review began.

56%
Reduction from prior Phase 1 results

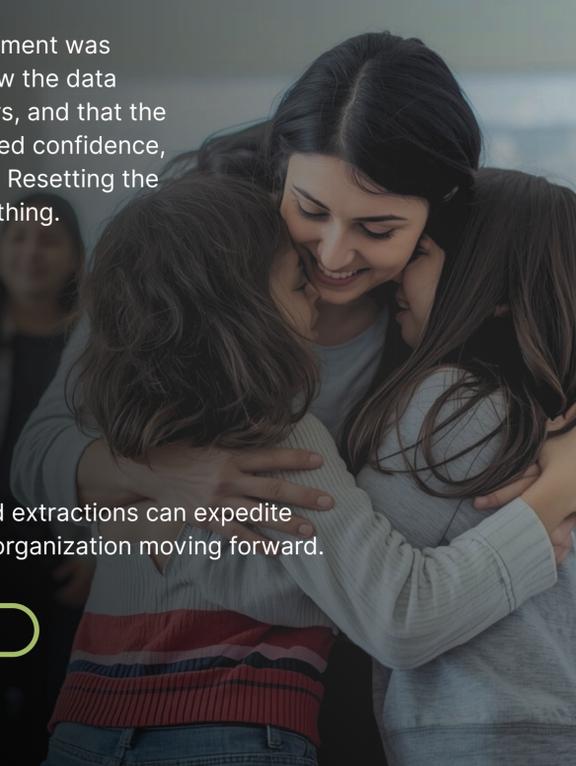
FULL VISIBILITY AND EXPEDITED RESPONSE

After re-indexing, refinement, and deduplication, just 44% of the total dataset proved responsive. This disciplined reduction ensured notification decisions were grounded in evidence, not inflated volume.

44%
Final responsiveness rate

“Taking over this engagement was personal for us. We knew the data deserved better answers, and that the people behind it deserved confidence, not inflated uncertainty. Resetting the analysis changed everything.”

Nadeema Safi
Manager, Customer Success
ACTFORE



Find out how automated extractions can expedite response and get your organization moving forward.

CONTACT US