

OCCUPATIONAL THERAPY COMPACT COMMISSION (OTCC)
CompactConnect DATA BREACH POLICY



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| Effective Date: November 1, 2025 | Scope: This policy applies to staff of the OTCC and organizations associated with the development of CompactConnect, the OTCC's data system. |
| Purpose: This policy establishes the process by which a data breach is mitigated and communicated in the unlikely event of a data breach of the OTCC's data system. | Security and Confidentiality: CompactConnect is developed to meet or exceed industry standards in software security. Data shared to and stored in the system is confidential and only accessible by administrators with assigned permission levels. |

Policy Statement:

In the unlikely event that data in CompactConnect is breached, CompactConnect and associated organizations will do their best to notify affected groups and individuals and remedy the situation.

CompactConnect has automatic monitoring and alarms to notify personnel in case of a data breach. Highly sensitive data will be treated with greater urgency.

Note: If a commission's credit card processing vendor account is breached, this is the responsibility of the individual compact, and CompactConnect does not have any obligations.

Below is a table of the types of data stored in the system and how notifications will be handled after a breach is confirmed by the CompactConnect team.

| Data type | Example | Who is notified | Notification timeframe | Notification method |
|-------------------------------------|--------------------------------------------|--------------------------------------|------------------------|---------------------|
| Highly sensitive | Social Security Number | Compact directors | immediately | Text; email |
| | | states; licensees | Within 24 hours | email |
| Personally identifiable information | Date of birth, address | Compact directors | Immediately | Text, email |
| | | States; licensees | Within 24 hours | email |
| Military documentation | Accepted documents decided by each compact | Compact directors; licensees | Within 24 hours | email |
| Staff login information | Email, password | Compact directors; states | Within 24 hours | email |
| Licensee login information | Email, password | Compact directors; licensees | Within 24 hours | email |
| Public Information | License number, license expiration, etc | Compact directors; states; licensees | Within 24 hours | email |

Policy Review:

This policy will be reviewed annually to ensure its relevance and effectiveness. Any updates or changes to the policy will be communicated to all Delegates and staff.

This policy was originally drafted by the OTCC Executive Committee in October 2025. It became effective on November 1, 2025.

| POLICY REVISION HISTORY | | | |
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| Date of Revision | Revised by (author) | Final approval authority | Effective Date of Revised Policy |
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