IT Incident Response Plan

<DATE>

<OFFICIAL SPONSORING POLICY> i.e. Director of Information Technology, John Doe HIPAA/HITECH 164,308(a)(6), ISO/IEC 27001 A.13.1.1, A.13.1.2, A.13.2.1, A.13.2.2

This Incident Response Plan is documented to provide a well-defined, organized approach for handling any potential threat to computers and data, as well as taking appropriate action when the source of the intrusion or incident at a third party is traced back to the <company name> private network. This Incident Response Plan identifies and describes the roles and responsibilities of the Incident Response Team. The Incident Response Team is responsible for putting the plan into action.

Incident Response Team

The Incident Response Team is established to provide a quick, effective and orderly response to computer related incidents such as virus infections, hacker attempts and break-ins, improper disclosure of confidential information to others, system service interruptions, breach of personal information, and other events with serious information security implications.

The Incident Response Team's mission is to prevent a serious loss of profits, client confidence or information assets by providing an immediate, effective and skillful response to any unexpected event involving computer information systems, networks or databases.

The Incident Response Team is authorized to take appropriate steps deemed necessary to contain, mitigate or resolve a computer security incident. The Incident Response Team is responsible for investigating suspected intrusion attempts or other security incidents in a timely, cost-effective manner and reporting findings to management and the appropriate authorities as necessary. The Director of Information Technology will coordinate these investigations.

Incident Response Team Members

Director of Information Technology Director of Information Security Help Desk Manager Applications Manager Network/Systems Manager Director of Operations Firm Managing Director Legal Counsel

Incident Response Team Notification

For ease of reporting, and to ensure a timely response 24 hours a day, seven days a week, the IT Department Help Desk will act as the central point of contact for reporting any incidents.

All computer security incidents reported to Help Desk must be reported to the Director of Information Technology. A preliminary analysis of the incident will take place by the Director of Information Technology that will determine whether Incident Response Team activation is appropriate.

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Types of Incidents

There are many types of computer incidents that may require Incident Response Team activation. Some examples include:

- Breach of personal information
- Denial of service/Distributed denial of service
- Excessive port scans
- Firewall breach
- · Virus outbreak

Breach of Personal Information — Overview

This Incident Response Plan outlines steps our organization will take upon discovery of unauthorized access to personal information on an individual that could result in harm or inconvenience to the individual such as fraud or identity theft. The individual could be either a client or employee of <company name>

Personal information is information that is, or can be, about or related to an identifiable individual. It includes any information that can be linked to an individual or used to directly or indirectly identify an individual. Most information the firm collects about an individual is likely to be considered personal information if it can be attributed to an individual.

Personal information is defined as an individual's first name or first initial and last name, in combination with any of the following data:

- Social Security number
- Driver's license number or Identification Card number
- Financial account number, credit or debit card number
- Home address or e-mail address
- Medical or health information

Definitions of a Security Breach

A security breach is defined as unauthorized acquisition of data that compromises the security, confidentiality or integrity of personal information maintained by <company name>. Good faith acquisition of personal information by an employee or agent of our company for business purposes is not a breach, provided that the personal information is not used or subject to further unauthorized disclosure.

Employee Responsibilities

All firm employees must report any suspected or confirmed breach of personal information on individuals to the IT Department immediately upon discovery. This includes notification received from any third-party service providers or other business partners with whom the organization shares personal information on individuals.

The employee reporting the suspected breach will assist in acquiring information, preserving evidence and providing additional assistance as deemed necessary by the Director of Information Technology or other Incident Response Team members throughout the investigation.

Classification / Identification of a Potential Incident

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All reports of a potential incident shall be classified as a high/medium/low risk to facilitate the actions to take.

Criticality: High

Definition: Incidents that have a monumental impact on the firm's business or service to clients.

Example: Unauthorized system access.

Criticality: Medium

Definition: Incidents that has a significant or has the potential to have a monumental impact on the firm's

business or service to its clients. Example: Password cracking attempt.

Criticality: Low

Definitions: Incidents that has the potential to have a significant or monumental impact on the firm's

business or service to its clients. Example: Firewall scanning.

Response

Once a potential incident has been reported, the appropriate member of the IT Department should be notified for response. Members of the IT Department will be responsible for performing the initial investigation to determine if an incident has occurred. The following checklist identifies steps that can be used to facilitate in classifying the incident, if one in fact has occurred:

- Collection and review of log files
- Review of installed or running privileged programs
- Inspection for system file tampering
- Sniffer or Network Monitoring Programs reports
- Detection of unauthorized services installed on systems
- Evidence of password file changes
- Review system and network configurations
- Detection for unusual files
- Examination other hosts

Note: In responding to a reported incident, it may be good prudence to shut down any or all systems for the stopping of an attack in real time and/or the preservation of any potential forensic evidence.

Recovery

The main purpose of this Incident Response Program is to ensure an efficient recovery through the eradication of security vulnerabilities and the restoration of repaired systems. Recovery includes the ensuring the attacker's point of penetration and any associated vulnerabilities have been eliminated and all system operations have been restored.

Periodic Testing & Remediation

It is the responsibility of the IT Department to test and review the Incident Response Plan quarterly. When testing is done, each system should be scanned for the open vulnerability before remediation and then scanned again after the remediation to verify that the vulnerability has been eliminated.

Incident Response Plan Example

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This document discusses the steps taken during an incident response plan.

- 1) Anyone who discovers the incident will contact the IT Help Desk. The Help Desk will log:
 - a. Name of caller or source of incident alert (software notifications).
 - b. Time of first report.
 - c. Nature of the incident.
 - d. What system(s) or persons were involved?
 - e. Location of equipment or persons involved.
 - f. How incident was detected.
- 2) The IT staff member who received the call will refer to their contact list for Incident Response Team to be contacted. The IT Help Desk will contact those designated on the list. The IT Help Desk will contact the IT Director using both email and phone messages. The IT Help Desk will log the information received. The IT Help Desk could possibly add the following information to the report:
 - a. Is the equipment affected business critical?
 - b. What is the severity of the potential impact?
 - c. Name of systems being targeted, along with operating system, IP address, and location.
 - d. IP address or any other information about the origins of the incident.
- 3) Contacted members of the response team will meet or discuss the situation over the telephone and determine a response strategy.
 - a. Is the incident real or perceived?
 - b. Is the incident still in progress?
 - c. What data or property is threatened and how critical is it?
 - d. What is the impact on the business should the attack succeed? Minimal, serious, or critical?
 - e. What system or systems are targeted, where are they located physically and on the network?
 - f. Is the incident inside the trusted network?
 - g. Is the response urgent?
 - h. Can the incident be quickly contained?
 - i. Will the response alert the attacker and do we care?
 - j. What type of incident is this? Example: virus, worm, intrusion, abuse, damage.
- 4) An incident ticket will be created. The incident will be categorized into the highest applicable level of one of the following categories:
 - a. High Incidents that have a monumental impact on the firm's business or service to clients.

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- b. Medium Incidents that has a significant or has the potential to have a monumental impact on the firm's business or service to its clients.
- c. Low Incidents that has the potential to have a significant or monumental impact on the firm's business or service to its clients.
- 5) Member of the IT Department will use investigative techniques, including reviewing of system logs, looking for gaps in logs, reviewing intrusion detection or firewall logs and interviewing witnesses to determine how the incident was caused. Only authorized personnel should be performing interview or examining IT systems. A chain of custody must be established and all potential evidence preserved and secured for turnover to proper authorities.
- 6) Incident Response Team will recommend changes to prevent the occurrence from happening again or spreading to other systems.
- 7) The IT Department will restore the affected system(s) to the pre-incident state and assess potential damages.
- 8) Post-mortem review of response and update policies take preventive steps so the incident doesn't happen again.
 - a. Would an additional policy have prevented the incident?
 - b. Was a procedure or policy was not followed which allowed the incident? What could be changed to ensure that the procedure or policy is followed in the future?
 - c. Was the incident response appropriate? How could it be improved?
 - d. Was every appropriate party informed in a timely manner?
 - e. Were the incident-response procedures detailed and did they cover the entire situation? How can they be improved?
 - f. Have changes been made to prevent another incident? Have all systems been patched, systems locked down, passwords changed, anti-virus updated, email policies set, etc.?
 - g. Should any security policies be updated?
 - h. What lessons have been learned from this experience?