



## 1. INTRODUCTION

After receiving a report of an information technology situation, the OIT evaluates its potential impact on the confidentiality, integrity or availability of University computer systems, networks or data. OIT staff may identify it as an *event* that requires further action. Following this evaluation and additional investigation, the Chief Information Officer or designee may declare an event to be an information technology *incident*, and make a preliminary determination of its potential severity (minor or major). The severity level governs the level and type of response. Typically, events and low severity incidents are handled by individual departments while high severity incidents require a larger OIT response.

## 2. POLICY STATEMENT

This Policy specifies actions required of University personnel reporting or responding to an information technology situation that may threaten the confidentiality, integrity or availability of University systems, networks or data.

- 2.1. All members of the University community are responsible for reporting known or suspected information technology events promptly, as described in Section 6.1 of this document.
- 2.2. The University reserves the right to take necessary action under this policy to protect University resources or preserve evidence.
- 2.3. The Chief Information Officer (CIO) or designee is responsible for escalating a reported event as an incident, according to the criteria in Section 6.2 of this document, and for directing any action deemed necessary to facilitate incident response.
- 2.4. Individuals reporting or responding to an incident will follow all relevant OIT procedures.
- 2.5. In the event of University EOC activation, the direction of the EOC supersedes any action directed under this policy.
- 2.5. All individuals involved in reporting or investigating an information security event or incident are obliged to maintain confidentiality, unless a University Vice President authorizes information disclosure.
- 2.6. The CIO or designee must approve any exceptions to this policy or related procedures.

## 3. SCOPE

This policy applies to all individuals or entities using any University computer systems, networks or data.

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#### 5. DEFINITIONS

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<b>Information Technology Event</b>	Any situation that <i>has the potential</i> to threaten the confidentiality, integrity or availability of University computer systems, networks or data. An event includes loss of control of University information through unauthorized access, equipment loss, or theft.
<b>Information Technology Incident</b>	Any event that is <i>known or suspected</i> to have significantly compromised the confidentiality, integrity or availability of University computer systems, networks or data. The CIO, or their designee, may declare that an event is an incident, following the procedures in Section 6.1 of this document.

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#### 6. PROCEDURES

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<b>6.1. Reporting and Assessment</b>	<p>Any member of the Notre Dame community who identifies an information technology situation of potential concern should report it promptly through one of the following channels:</p> <ol style="list-style-type: none"><li>1. OIT Help Desk at (574) 631-8111 (business hours)</li><li>2. OIT Duty Officer at (574) 631-5603 (after business hours)</li><li>3. Departmental or Distributed Support Services personnel</li><li>4. Via e-mail to oithelp@nd.edu</li></ol> <p>Help Desk or OIT Duty Officer personnel receiving a report will contact the appropriate first-level support for the system or application in question. If the reported event appears to meet one or more major incident criteria described in Section 6.2, the Help Desk or Duty Officer also will contact the responsible technical</p>
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personnel to evaluate the event, and in cases of extreme severity or time-sensitivity, may also provide a preliminary notification to the CIO.

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## 6.2. Classification

Upon consideration and assessment of an event notification, the CIO or designee may declare a formal information technology **incident**. An **event** will be considered an **incident** only upon such declaration.

An information technology **incident** falls into one of two categories:

**A major incident** is known or suspected to meet one or more of the following criteria:

1. Involves unauthorized access to, loss or theft of a device known to store, process or transmit highly sensitive information.
2. Involves the suspected compromise of a critical enterprise security device, such as a data center firewall, border firewall, or authentication service.
3. Involves compromise of an OIT-managed networking device, such as a router or switch.
4. Causes the extended unavailability of a service critical to the University's mission.
5. Involves a significant number of University systems, indicating a widespread attack.
6. In the judgment of the CIO, poses a high severity risk to University systems or information.

**A minor incident** is any information technology incident that does not meet the foregoing criteria.

The CIO (or designee) determines the initial classification when declaring an incident, subject to later reclassification. At the CIO's discretion, a major incident may be treated as a campus emergency, in accordance with the Campus Emergency Preparedness and Response Plan.

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## 6.3. Response

The highest priority is to protect the campus community and University resources. For all declared incidents, the priority of response will be:

1. protect human safety;
2. protect University resources;
3. contain damage or spread;
4. preserve evidence;
5. eradicate damage; and
6. restore systems and services.

If an incident meets one or more of the major incident criteria (as defined by the *Classification* procedure in Section 6.2), any member of the OIT technical staff may exceed their normal authority to take and/or direct immediate action to protect

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University computer systems, networks or data. This includes, but is not limited to, the use of an attack-blocking facility, or the immediate and complete disconnection of a suspected compromised system from University networks. If this action is necessary, the staff member taking such action will notify the CIO as soon as practical. OIT staff also may notify the administrator of the system, but such notification is *not* a prerequisite to actions necessary to protect University resources or preserve evidence. In cases when necessary to support an active investigation, or to preserve evidence, OIT Information Security may also take physical possession of any system believed to be involved in the event.

If, when responding to an incident, it is discovered that credit cards have been compromised, we will follow published response requirements of the credit card brands, as required by the Payment Card Industry Data Security Standard. This is in addition to any other requirements that may exist.

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### **Business Continuity During an Incident Investigation**

In some cases, information security incidents may require the isolation of computing systems critical to business functions. Such decisions are based upon the professional judgment of responders and may require units to activate their business continuity plans. While disruption to University business is always a consideration in the decision to isolate a system, responders must balance that consideration against the risk to other University resources.

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During the response to a security incident, meetings and notifications will include the data steward(s) with responsibility for any sensitive information involved. The CIO or designee will direct such actions as deemed necessary to respond. This authority includes, as appropriate, communication with other campus personnel.

The CIO (or designee) is responsible for authorizing either the restoration of the system to operation or the continuing investigation.

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## **6.4. Documentation**

Upon formal declaration of an information technology incident, the responsible group will prepare a summary of the relevant technical and operational details and provide it to the OIT Senior Leadership Team.

If an incident extends beyond 24 hours, the responsible group will send the Senior Leadership Team updates, no less frequently than daily, on the status of the incident and remediation efforts.

Within four business days of the conclusion of an incident, the responsible group will prepare an incident report and provide it to

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the Senior Leadership Team.

The University will comply with all reporting requirements imposed upon it by law or contractual obligation. The Office of General Counsel will coordinate any such action.

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**6.5. Evaluation and Testing**

The OIT will conduct an annual test of the incident response process. In years where a major incident occurs, a lessons-learned review may substitute for the annual test.

The Director of Information Security will coordinate a biannual review of the Information Technology Incident Response Policy and related procedures, following the Policy Review and Update Process.

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**7. REFERENCE DOCUMENTS**

<b>Policy or Document</b>	<b>Web Address</b>
Campus Emergency Preparedness and Response Plan	<a href="http://emergency.nd.edu/">http://emergency.nd.edu/</a>
Highly Sensitive Information Handling Standards	<a href="http://oit.nd.edu/policies/itstandards/infohandling.shtml">http://oit.nd.edu/policies/itstandards/infohandling.shtml</a>
Incident Response Procedures	See Section 6
Information Security Policy	<a href="http://oit.nd.edu/policies/itpolicies/infosec.shtml">http://oit.nd.edu/policies/itpolicies/infosec.shtml</a>
Responsible Use of Information Technologies Policy	<a href="http://oit.nd.edu/policies/rup.shtml">http://oit.nd.edu/policies/rup.shtml</a>
Visa Cardholder Information Security Program – Actions if Compromised	<a href="http://usa.visa.com/merchants/risk_management/cisp_if_compromised.html">http://usa.visa.com/merchants/risk_management/cisp_if_compromised.html</a>

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**8. CONTACTS**

<b>Subject</b>	<b>Office</b>	<b>Telephone Number</b>	<b>Email or URL</b>
Policy Clarification	Office of the Chief Information Officer, OIT	(574) 631-9700	<a href="mailto:cio@nd.edu">cio@nd.edu</a>
Procedures	Information Security, OIT	(574) 631-3338	<a href="mailto:infosec@nd.edu">infosec@nd.edu</a>

Web Address for this Policy	<a href="http://policy.nd.edu/policy_files/InformationSecurityIncidentResponsePolicy.pdf">http://policy.nd.edu/policy_files/InformationSecurityIncidentResponsePolicy.pdf</a>
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## **9. APPENDIX A: DELEGATION OF AUTHORITY**

The CIO delegates authority under this policy to the following individuals:

- OIT Senior Directors may declare an information technology incident and make the determination of severity.
- The Director of Information Security may declare an information technology incident and make the determination of severity in the case of an information security incident.