## Appendix C:

## UCSC Campus Incident Response Team (CIRT) Checklist

**Instructions:**

Complete checklist for each incident for which the CIRT is convened. Identify whether existing procedures and incident documentation suffice or if additional documentation is needed.

**Checklist:**

### Related to Data Involved

* Types of data involved:
  + - SSN
    - Driver’s License or State ID
    - Financial account information
    - Credit card or account numbers
    - Personal health, medical or medical insurance information
    - Other Restricted Data (specify):
    - FERPA-protected data (will need to notify Registrar)
    - “Significant” or “high-visibility” incident (specify):
* Refer to [*Information Breach Decision Tree for California State Law*](http://www.ucop.edu/information-technology-services/initiatives/university-policies/ucinfo_breach_decision_tree_ca_state_law.pdf) for guidance on regulatory requirements for the timing of notifications to affected individuals, regulatory agencies, and the media, if appropriate.
* If ePHI was involved:
  + Refer to *Information Breach Decision Checklist for HIPAA* (available from UC HIPAA Officers or Health Lawyers) for guidance on regulatory requirements for the timing of notifications to affected individuals, regulatory agencies, and the media, if appropriate.
  + Perform and document a risk assessment to determine whether there is a significant risk of harm to the individual whose PHI was inappropriately disclosed.
  + Ensure compliance with required notifications.
  + Include any unauthorized disclosure of PHI on the HIPAA Accounting for Disclosures log.
  + Include any sanctions in the HIPAA sanctions log.
* Is redaction required for any security sensitive information?  
   *e.g. “Target of the attack [Host Name/IP Address] should not be listed for incidents involving protected health information or sensitive student information”*

### Incident Handling

* Do we need to involve any external agencies? E.g., law enforcement, regulatory agencies.
* Is law enforcement involved? If so, how does it affect incident handling?
* Is there a potential for insurance claim? If so, how does it affect incident handling?
* Are there any other factors that affect containment of the incident?  
  *Containment is the combination of actions, including technical controls such as network and system disconnects, that limit the damage to University resources.*
* Is preservation of evidence required?  
  *Documentation per “Proper preservation of evidence requires establishment of chain of custody procedures prior to an incident. Any electronic evidence should be properly tracked in a documented and repeatable process. “*
* Is a forensic analysis required?
* Do we document estimated technical impact of the incident (i.e. data deleted, system crashed, application unavailable)?
* Do we track total hours spent on incident handling and/or additional non-labor costs involved in handling (estimate), and any other incident response costs?

### Notification

Considerations for notification (See Exhibit B in [UC Incident Response Plan](http://www.ucop.edu/information-technology-services/_files/uc_incidentresp_plan.pdf))

* Develop a Call Center  
  *Decide on using an internal vs. external; toll-free telephone number; determine the staffing (numbers) and coverage hours and days of week; train staff to respond to incident calls (provide standard scripts); comfortable setting (head-sets, quiet area, computer); bilingual skills, etc.*
* Communications Plan  
  *Identify who needs to be notified (internal / external), who is responsible, coordinate the response and message; develop internal FAQs; press release draft; escalation guide for call center; formal notification to other agencies, vendors, stakeholders, media contact persons; press briefing*
* Notification methods  
  *Internal e-mail, US mail, media alert/press release; mail house/breach response company; type of letterhead and whose signature; envelope style; finalize the letter and determine whether to include FAQs with the letter.*
* Regulatory agencies  
  *Determine which agencies (e.g., CA Attorney General, CDPH, OCR, etc.), if any, require notification; provide each agency with their required information, in the format and manner (electronic, written, etc.) they require*
* Mail house  
  *Determine whether the mail house is required to cleanse the list with National Change of Address Office; if so, determine if you want to be notified of address updates; execute a HIPAA Business Associates Agreement (BAA) with the external mail house if the incident is associated with a breach of PHI (protected health information)*
* Do we need to document responses to letters and concerns?
* Do we need to document the source of notification addresses and alternatives?

### Incident Report

Additional documentation:

* Contact information for all parties involved in the incident   
  *(include why)*
* Complete incident handling log/technical report (supplemental to the incident report)
  + Comprehensive incident log including documentation of all activities and include a date / time log as appropriate, e.g., who did what when
  + Detailed information about the event, including actions taken and personnel involved
  + Detailed information about the investigation
  + When, where, and from whom the evidence was received (or taken)
  + The physical analysis (visual evaluation), including brand names, model numbers, and serial numbers
  + The forensic duplication, including how the image was made (for digital evidence), the software and hardware used to make the image, and the hash comparison results
  + Every step taken in the analysis of media. Explain what tools were used and what was or was not discovered as a result of these processes. Document other information such as: number and size of sectors, operating systems, significant software, anti-virus, crash-guard software, etc.
  + All conclusions reached
  + How and when the evidence was returned or the manner in which it was disposed
  + Note: data used in this report should reference collected evidence, and be verifiable

### Post-Incident Review (PIR)

* Complete PIR

Determine if PIR should be done under attorney-client privileges.

* + Remaining action items related to remediation
  + Root cause
  + Lessons Learned:
    - What worked well; what didn’t work so well
    - Cover technical measures; policy/guidelines, roles/responsibilities or org structure;
  + Recommendations based on lessons learned and root cause
* Communication plan (not related to notification), including
  + requirement (if needed) to use encryption or out-of-band mechanisms for incident-related communications
  + public statements or other communications external to the CIRT
  + notification of other campuses