Overview

The state of Louisiana’s Incident Response Plan is a critical element to ensure effective priorities and management of an Incident is managed and prioritized as required by the state of Louisiana’s Information Security Policy.

This Incident Response Plan clearly outlines required actions in the following; identification, response, remediation, and follow-up to the occurrence. The intent of this plan is to outline actions performed by the Information Security Team, and respond to security incidents in a timely, efficient manner.

Incident Identification and Classification

Upon notification and determination that a Security Event is an Incident, the Chief Information Security Officer (CISO) and Incident Response Team (IRT) will begin the formal Incident management process starting with assigning an appropriate classification level to the Incident.

Classification

- The CISO or designee within the Information Security Team (IST) will determine if the Security Event needs a formal Incident Response written, if so the CISO must be involved and classify the event.
- Security Incidents that do not require a formal Incident Response will be forwarded to the appropriate staff members from either Office of Technology Services (OTS), or the Agency to ensure that all support services required are rendered.
- Security Events that do require a formal written Incident Response will have its classification level assigned by the CISO according to the Incident Classification Matrix outlined in this plan.

Classification Criteria

- Classifications are determined by evaluating the likelihood and potential impact of an Incident.
- The details of Security Incidents, events, or breaches, which must be reviewed thoroughly from the Information Security Team before including the Chief Information Security Officer (CISO). The likelihood of a reoccurrence of the event. The IST should also perform an impact analysis and document the details (criticality of the affected resources and the consequences) of the event.
- The analysis of the likelihood of occurrence and the impact of the affected resources shall result in the assignment of one of four classifications.

Likelihood - shall be determined based on the following criteria:

- Rare - Highly unlikely, but may occur in exceptional circumstances.
- Unlikely - Event is not expected, and a slight possibility of occurrence may exist. Identified vulnerability or issue may be legitimate; however, compensating controls are in place and make exploitation impossible or unreasonably difficult.
- Possible - The event might occur at some time, as there is a history of casual occurrence of the observed behavior.
- Likely - There is a strong possibility and expectation of occurrence, or there is a history of frequent occurrence.
- Almost Certain - The event is expected to occur in most circumstances, there is a precedent for regular occurrence, and preventative controls are not adequate or in place.
Impact - shall be determined by the associated criticality of affected resources and the following criteria for determining the current or potential severity of the Incident:

- **Insignificant** - Identified risk impacts systems which are non-critical to business functionality, which do not contain Confidential or Restricted Data, and can be replaced with an alternative solution if made unavailable. Examples include printers, multi-function devices, and scanners.

- **Minor** - Identified risk impacts systems which are non-critical to business functionality, which do not contain Confidential or Restricted Data, but cannot be replaced with an alternative solution if made unavailable. Examples include meeting room devices and kiosk stations.

- **Moderate** - Identified risk impacts systems which are non-critical to business functionality but which contain a moderate amount of Confidential or Restricted Data. Examples include end-user computing devices including laptops, tablets, smartphones, and desktop computers.

- **Major** - Identified risk impacts systems which are non-critical to business functionality but contain a large volume of Confidential or Restricted Data. Major criticality may also be assigned to systems which are critical to business functionality but which do not contain Confidential or Restricted Data. Examples include file servers, development and test resources, and business analytics systems.

- **Severe** - Identified risk impacts systems which are critical to agency functionality and contain Confidential or Restricted Data. Exposure of systems determined to be critical may result in severe consequences including loss of Confidential or Restricted Data. Removing the affected resource from production will have a negative impact to agency functionality. Examples include *.laworks.net, external service applications.

### Severity

- **Based on the likelihood of occurrence and the impact to the affected resources, the CISO will assign one of four incident severity classifications to an incident.**

- **Once the Incident Management Team Leader (IMTL) has declared a security incident and its severity level, the Incident Response Leader will initiate an appropriate response for the given incident.**

<table>
<thead>
<tr>
<th>Likelihood</th>
<th>Insignificant</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
<th>Severe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Almost Certain</td>
<td>M</td>
<td>H</td>
<td>H</td>
<td>E</td>
<td>E</td>
</tr>
<tr>
<td>Likely</td>
<td>M</td>
<td>M</td>
<td>H</td>
<td>H</td>
<td>E</td>
</tr>
<tr>
<td>Possible</td>
<td>L</td>
<td>M</td>
<td>M</td>
<td>H</td>
<td>E</td>
</tr>
<tr>
<td>Unlikely</td>
<td>L</td>
<td>M</td>
<td>M</td>
<td>M</td>
<td>H</td>
</tr>
<tr>
<td>Rare</td>
<td>L</td>
<td>L</td>
<td>M</td>
<td>M</td>
<td>H</td>
</tr>
</tbody>
</table>

- **Low** - One instance of potentially unfriendly activity (e.g., port scan, malware detection, unexpected performance peak, observation of potentially malicious user activity, theft of a device, etc.)
Incident Response Plan

- **Medium** - One instance of a clear attempt to obtain unauthorized information or access (e.g., attempted download of secure password files, attempt to access restricted areas, single computer infection on a non-critical system, successful unauthorized vulnerability scan, etc.) or a repeated or persistent Low Incident. Incidents classified as Medium risk may also include the incidental internal exposure of one employee record. Medium incidents may also include vulnerabilities with a rare rate of occurrence on critical systems, due to either compensating controls, network isolation, or other factors.

- **High** - Serious attempt or actual interruption in availability, or negative impact to confidentiality or integrity, or Data Breach. (e.g., multi-pronged attack, denial of service attempt, virus infection of a critical system or the network, multiple concurrent infections of systems, successful buffer/stack overflow, successful unauthorized access to systems hosting or transmitting Confidential or Restricted Data, broken lock, stolen papers, etc.) Or; a repeated or persistent Medium Incident. Incidents with a high criticality may include systems with low to moderate criticalities, which are affected by vulnerabilities are most likely to be exploited.

- **Emergency** - Incidents that involve the potential breach of Restricted or Confidential Data. Incidents classified as Emergency risk require immediate attention including the engagement of Data Owners and SMEs to perform short-term containment including taking down potentially compromised systems and applications. Incidents with an emergency criticality are likely to be assets with high criticality to business functionality, affected by threats, and almost certain to occur.

### Incident Response Team

**Service Level Agreement**

- Incidents Management Service Levels (SLAs) shall be based on the severity classification.
- SLAs shall include metrics for acceptance, containment, and resolution phases of the Incident Management process.
- The IRT leader shall remain aware of pending SLA violations by identifying when a metric is within a specified threshold of violation.

<table>
<thead>
<tr>
<th>Response Phase</th>
<th>Severity Class</th>
<th>Service Level Objective</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acceptance</td>
<td>Emergency</td>
<td>1 hour (24 x 7),</td>
<td>Acceptance is the receipt of an incident by the IST.</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>1 business hours</td>
<td>Acceptance includes assigning a criticality level to the Incident and initiating the formal incident response plan.</td>
</tr>
<tr>
<td></td>
<td>Medium</td>
<td>2 business hours</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Low</td>
<td>8 business hours</td>
<td></td>
</tr>
<tr>
<td>Containment</td>
<td>Emergency</td>
<td>3 hours (24x7)</td>
<td>Containment is the successful implementation of</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>5 hours (24x7)</td>
<td>mitigating controls to prevent any possibility of</td>
</tr>
<tr>
<td></td>
<td>Medium</td>
<td>8 business hours</td>
<td>Propagation.</td>
</tr>
<tr>
<td></td>
<td>Low</td>
<td>2 business days</td>
<td></td>
</tr>
<tr>
<td>Recovery</td>
<td>Emergency</td>
<td>8 business hours</td>
<td>Resolution is the successful restoration of an affected</td>
</tr>
<tr>
<td></td>
<td>High</td>
<td>1 business days</td>
<td>resource to production use after implementing long-term</td>
</tr>
<tr>
<td></td>
<td>Medium</td>
<td>3 business days</td>
<td>Corrective actions.</td>
</tr>
<tr>
<td></td>
<td>Low</td>
<td>5 business days</td>
<td></td>
</tr>
</tbody>
</table>
Roles

- Individuals from applicable operational areas or sections within OTS and Agencies will have responsibilities assigned as outlined below. This team may be use additional staff as warranted by the specific circumstance of the incident.
- The following table notes the individuals and roles comprising the Incident Response Team (IRT).

<table>
<thead>
<tr>
<th>Group</th>
<th>Roles</th>
<th>Primary</th>
<th>Secondary</th>
</tr>
</thead>
<tbody>
<tr>
<td>Security Steering Group</td>
<td>CIO, &amp; Designees, CISO</td>
<td>Dickie Howze</td>
<td>Neal Underwood</td>
</tr>
<tr>
<td>Incident Management Team Lead (IMTL)</td>
<td>CISO</td>
<td>Dustin Glover</td>
<td>Donny Brown</td>
</tr>
<tr>
<td>Incident Management Team (IMT)</td>
<td>CISO, Data Center Operations (DCO), Applications and Data Management (ADM), Network Services (NS), EndUser Computing (EUC), Agency Relationship Management (ARM)</td>
<td>Derek Williams - DCO Michael Andresen - ADM Catherine Shain - NS Jeremy Deal - EUC Thomas Allsup - ARM</td>
<td>Joe Lee - DCO Tammy Starnes – ADM Derrick Williams – NS Debbie Griffith - EUC Stacy Campbell - ARM</td>
</tr>
<tr>
<td>IMT - Incident Response Manager</td>
<td>IRM – Incident Response Team Lead</td>
<td>Appointed by IMTL</td>
<td>Appointed by IMTL</td>
</tr>
<tr>
<td>IMT – Legal</td>
<td>Subject Matter Expert in Legal and Compliance</td>
<td>Stephen Kogos</td>
<td>TBD</td>
</tr>
<tr>
<td>IMT – Public Relations</td>
<td>Subject Matter Expert for Public Communications</td>
<td>TBD</td>
<td>TBD</td>
</tr>
<tr>
<td>IMT – Human Resources</td>
<td>Subject Matter Expert in HR Area</td>
<td>Cheryl Shillings</td>
<td>TBD</td>
</tr>
<tr>
<td>IRT - Incident Handler</td>
<td>Lead IRT Resource – Assigned permanently until Incident is resolved</td>
<td>Appointed by IRTL</td>
<td>Appointed by IRTL</td>
</tr>
<tr>
<td>IRT - Investigator</td>
<td>IMT/ IRT member</td>
<td>Appointed by IRTL</td>
<td>Appointed by IRTL</td>
</tr>
<tr>
<td>IRT - InfoSec Specialist</td>
<td>Subject Matter Expert in Information Security</td>
<td>Appointed by IMTL</td>
<td>Appointed by IMTL</td>
</tr>
<tr>
<td>IRT - Agency Relations Manager (ARM)</td>
<td>Appointed by OTS for Service Management for each State Agency</td>
<td>As Applicable</td>
<td>As Applicable</td>
</tr>
<tr>
<td>IRT - Asset Owner / Agency Contact</td>
<td>Effected Agency Owner, or Designee, and identified by ARM</td>
<td>As Applicable</td>
<td>As Applicable</td>
</tr>
<tr>
<td>IRT - Specialists / SMEs</td>
<td>Subject Matter Experts in OTS Section or Business Services Areas</td>
<td>As Applicable</td>
<td>As Applicable</td>
</tr>
</tbody>
</table>
Responsibilities
The following provides the list of all primary responsibilities of the roles listed above.

- **Security Steering Group (SSG) Members**
  - Take responsibility for overall incident management and response concept.
  - Approve exceptions/deviations.
  - Make final decisions.

- **Incident Management Team (IMT)**
  - In coordination with SSG and IRT, under the guidance of IMT Lead, the IMT manages the incident.

- **IMT Lead (IMTL) [CISO]**
  - Develops and maintains incident management and response capability.
  - Effectively manages identified Security Events, Risks, and Incidents.
  - Performs proactive and reactive measures to reduce information risk to an acceptable level.
  - Effectively communicates IRT needs or hurdles to SSG.
  - Manages communications outside of IRT resources.
  - Appoints Incident Response Manger and Information Security Specialist(s).

- **Incident Response Manger (IRM)**
  - Review the ticket information, incident documentation and any associated events/reports.
  - Appoints Incident Handler.
  - Responsible for creation and updating of Incident Report.
  - Provides direction and manages IRT activities.
  - Coordinates resources to effectively perform incident response tasks.
  - Escalates IRT resource needs, SLA violations, and challenges to IMT in a timely manner.
  - Sets up the communication channels for IRT upon notification of the incident (conference call, meeting, cell phones, emails, etc.)
  - Coordinates the response and investigation phases.
  - Responsible for successful execution of Incident Response Plan.
  - Presents incident response report and lessons learned to IMT Leader and SSG members.
Incident Response Plan

- **Incident Handler**
  - Assigned as a dedicated resource until Incident has successfully completed all phases.
  - Follows Incident Response Plan and Processes as documented.
  - Logs details of IRT activities and provides timely and reoccurring updates to IRM.
  - Verifies all phases of Incident Management Response were successfully completed.
  - Coordinates with IRT members to complete each phase of Incident Response.
  - Responsible for evidence collection retention and chain of custody.
  - Assist IRM with post-incident closure activities and the Lessons Learned process.

- **Agency Relationship Manager (ARM)**
  - Coordinates with IRM and IMTL for any Agency level communication.
  - Identifies Agency contacts or Asset owners.
  - Coordinates any additional Agency resources or Process SMEs as needed by the IRT.

- **Asset Owner (Agency Leadership or Delegate)**
  - Make decisions related to assets/systems when an incident happens, based on IMTL/IRT recommendations.
  - Provide clear overview of potential process impact during IRT activities.

- **Technical or Process Specialists/Representatives**
  - Provide support to IMT or IRT when resolving incidents.
  - Maintain information systems in a good condition per company policy and best practices.
  - Report any additional information as applicable to incident.
  - Not authorized to share details of any incident outside of IRT without explicit direction from IMTL.

- **Legal/Compliance**
  - Provide legal response to a breach including compliance with notification requirements for the PCI DSS, consumer and employee privacy, third-parties, and additional as required.
  - Coordinate with the IMTL and SSG whether general counsel is required for Incidents with legal impacts and ramifications, to include collection of evidence, prosecution of individuals, lawsuits, etc.
  - **Note:** Legal or Compliance Resources may be internal or external counsel that is specifically designated by the Asset Owner or as applicable for the impacted Agency or Agencies.
• Human Resources
  o Provide disciplinary or consulting support for instances where an internal employee was the cause of, or impacted by, the Incident.
  o Integrates HR policy to support Incident Management Program.
  o Sanctions to employees found in violation of Acceptable Use or involved in an incident.

• Public Relations
  o In coordination with Legal and SSG, provides all external relations and centralized responses to public entities or additionally identified resources.

Organizational Chart
Communications

Timely, accurate, and consistent notification is a critical operational requirement of any Incident Management effort and as such, any incident or breach notification must follow the processes outlined below.

Internal Notifications

- Incidents involving, or potentially involving, Confidential or Restricted Data must be communicated to all applicable IRT members, including, Legal, Human Resource, and Public Relations contacts, to ensure that appropriate measures are taken to report the incident both internally and externally.
- Incidents specifically involving employee PII elements will ensure appropriate members of Human Resources are involved prior to any internal or external communication is released.
- Progress notifications and applicable updates to IMT and SSG will only be sent from the IRM.
- Any other notification containing incident or investigation details to resources outside of the IRT is strictly prohibited, without prior approval from the IMTL.

External Notifications

- The IMT will discuss the potential need for external notifications with Legal, Public Relations, and SSG.
- Legal will then determine if there are legal requirements for notifying external parties of the incident, whether actual or suspected.
- Communications sent to any external or public entity (with exception of Partners required for Incident Response activities that have signed a Non-Discloser Agreement) will only initiate from Legal or Public Relations representatives.
- IMT, in conjunction with other applicable organizational or Agency members, will determine the need for any external professional services such as forensic analysis, malware detection, etc.
- Depending upon the actual or potential criminal elements of the Incident, the IMTL, in conjunction with Legal and SSG, will review the need to involve the appropriate State or Federal enforcement Agency.

  **Note:** Primary and Secondary Enforcement Contacts are listed within the Contacts table located within the last section of this document.

Breach Notifications

Depending on the Agency and Restricted Data elements impacted by the Incident, an Agency may have very specific regulatory, legal, or contractual obligations initially notify a Federal Department or Partner.

**Notification may be required even prior to confirmation of unauthorized access or disclosure.**

Incidents involving or potentially involving unauthorized disclosure of Federal Tax Information (FTI) requires immediate notification to Treasury Inspector General for Tax Administration (TIGTA) and IRS Office of Safeguards, prior to any internal investigation or incident response efforts. The Information Security Team has internal procedures they are required to follow when reporting to TIGTA.
**Breach Notifications (cont.)**

- Within the first initial hour of Incident, the IMTL or designee, working with applicable Legal resources, will review the need to notify any external Federal Agency or Agency Partner.
  - If initial notification to a Federal Agency or Partner is required, the IMTL will notify the SSG.
  - The SSG will assign an individual within the IMT to establish and maintain communication with the required Federal Agency or Partner during the course of the Incident.

**Note:** Federal Agency and Partner Contacts are listed in the contacts table located within the last section of this document.

- Any additional required breach notifications will be facilitated by an individual designated by Legal or SSG, working with IMTL or designee.

**Investigation and Evidence Collection**

Should there be an explicit or implied need to collect evidence the following requirements will apply.

**Data Retention**

- Retention of audit logs, e-mails, memos, etc. shall be maintained in accordance with State Record Retention Policy.

**Chain of Custody**

- An accurately maintained Chain of Custody is required when collecting and retaining the following evidence types.
  - Device or System images
  - Drive or Disk captures
  - Forensic System Exports

**Required Evidence**

- As required by the Incident Management and Response Policy, the following evidence should be collected, based on Incident severity, when available or applicable.
  - Application, System, or Security Logs
  - Applicable Reports
  - Emails (including message headers)
  - Helpdesk Tickets
  - Signed Statements of first-hand accounts.
Containment

The primary goal of the Containment phase is to prevent any increase in impact by additional data or system exposure, or allowing any propagation of unauthorized software.

Additionally, when possible, the Incident should be contained in a manner that will allow assigned IRT resources acceptable time to analyze to determine root cause.

Short-Term Containment

If appropriate, the following actions shall be taken:
- Network Isolation via Firewall or Internal Routers
- Disabling of Account Credentials
- Blocking outbound or inbound traffic via Web Proxy or Intrusion Prevention Systems
- End User Education

Long-Term Containment

When required, in addition to Short-Term Containment options, the following Long-term containment options shall be taken:
- System, Application, or Database Isolation via termination of physical network cable or virtual network interface.
- System, Application, or Database Isolation via host migration to separate Physically isolated Non-Production Network
- Code Change in Application
- Any additional technical control approved by the IMTL.

Root Cause Analysis

The IRT shall review all available network, system, database, and application logs to determine the Root Cause of the incident.

The Root Cause analyst shall cover the following:
- Point of Entry or Compromise
- Source (to include user, IP, mac address, email address, etc.)
- Impacted Systems and Application
- Data Types Accessed, Disclosed, or Modified
Eradication

Depending on the details, cause, and scope of the Incident; Eradication maybe required.

Required when:

• Unauthorized Software or Configuration has been added to or modified on any system or device.
• Confidential or Restricted Data has been moved or replicated to an unauthorized storage location.
• If required, an eradication strategy or approach should be used that will also the system to be validated or measure to confirm eradication was successful.

Recovery and Remediation

The goal of the Recovery and Remediation phase is to both restore any impacted technical or operational service and ensure the environmental changes necessary have been successfully implemented to prevent a repeat incident.

As applicable, based on Root Cause analysis, the following Recovery and Remediation options shall be used:

• Fresh Install and Patched Operating System
• Fresh install and Patched Application
• Modification of impacted control to prevent future incident
• Updated Impacted Application to mitigate identified vulnerability
• Implementation of new Information Security control or technology to prevent Incident

Lessons Learned

Once the Recovery and Remediation phase is complete, the IMTL will schedule a meeting with all IMT and IRT members to discuss the details associated with the Incident.

Minimally, the following areas or topics shall be discussed:

• Was this Incident due to a control failure? If so, how has it been improved to prevent future incidents?
• Does the remediation method or newly improved or implemented control impact other operational areas? Does it need to impact other areas to address similar risk?
• How could operational processes be improved to identify similar vulnerabilities prior to an incident?
Continuous Evaluation

**Training**

- All State employees, contractors, consultants, temporary employees, and other staff members, receive security awareness training upon hire and annually thereafter, that includes their responsibilities in notifying the CISO, or designee when they become aware or observe a Security Event.
- Applicable IRT members, and others as warranted, are required to attend incident response training on a regular basis as well as the Incident Response Procedures on an annual basis.

**Testing**

- The incident response plan must be organized by the CISO to be tested at least every 12 months basis without prior notification to the remainder of the IMT. Upon the reasonable discretion of the CISO, prior notification may be made to the Public Relations contacts so that external parties are not mistakenly notified because of testing.
- Following the test, the IMTL must compile a report to be distributed to the IMT & IRT with comments that may include:
  - Was the incident responded to following the plan?
  - Were the appropriate personnel notified internally?
  - Were the necessary technology resources available as needed?
  - Was the incident contained with the least amount of impact on other systems?
  - Are there any improvements to be made to the process?
## Contacts (External)

<table>
<thead>
<tr>
<th>Agency</th>
<th>Name</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Law Enforcement</strong></td>
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<td></td>
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<tr>
<td>FBI – Cyber Intrusion (P)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>FBI – Cyber Intrusion (S)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>LA-SAFE (Fusion Center)</td>
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<tr>
<td><strong>LA State Police</strong></td>
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<tr>
<td><strong>LA Office of Inspector General</strong></td>
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<tr>
<td><strong>Federal Agencies</strong></td>
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<tr>
<td>IRS (P)</td>
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<td>IRS (S)</td>
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<td>TIGTA (P)</td>
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<td>TIGTA (S)</td>
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<td>SSA (P)</td>
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<tr>
<td>SSA (S)</td>
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<tr>
<td>SSA (T)</td>
<td></td>
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</tr>
</tbody>
</table>

*Note: (P) - Primary, (S) - Secondary, (T) - Tertiary*
## Contacts (Internal)

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Phone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dickie Howze</td>
<td>CIO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Neal Underwood</td>
<td>Dep. CIO</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dustin Glover</td>
<td>CISO - Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Thomas Allsup</td>
<td>ARM – Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Jeremy Deal</td>
<td>EUC – Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Derek Williams</td>
<td>DCO – Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Michael Andresen</td>
<td>ADM – Director</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Catherine Shain</td>
<td>NS – Director</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
## Incident Response Plan - Revision and Review Log

<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Date</th>
<th>Action</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dustin Glover</td>
<td>CISO</td>
<td>2014 – 09-17</td>
<td>Initial Draft for Information Security Workgroup</td>
</tr>
<tr>
<td>Dustin Glover</td>
<td>CISO</td>
<td>2015 – 06-30</td>
<td>Update format in preparation for adding as Appendix Item within the Information Security Policy.</td>
</tr>
<tr>
<td>Dustin Glover</td>
<td>CISO</td>
<td>2015 – 07-29</td>
<td>Review document and updated with initial Contacts and title updates</td>
</tr>
<tr>
<td>Dustin Glover</td>
<td>CISO</td>
<td>2015 – 12-04</td>
<td>Removed ‘Draft’</td>
</tr>
<tr>
<td>Paula Sobolewski</td>
<td>Compliance Officer</td>
<td>2021-11-28</td>
<td>Reviewing document, updating grammar, Dating document</td>
</tr>
</tbody>
</table>