

Appendix – Management Response



MEMORANDUM

TO: Daniel Adams, Director, Office of Audit Services
FROM: David Bonilla, Chief Technology Officer, Great Falls College - MSU
RE: Cybersecurity Audit Response
DATE: 27-September-2021

Ransomware Response Specific Planning Should Be Formalized.

Recommendation: OAS recommends that MSU make the following improvements in its ransomware response specific planning.

1. **Ransomware response specific planning has not been sufficiently formally documented.**

Mgmt. Response: Concur with recommendation. GFCMSU IT Services will formally document the college's response to a ransomware attack, including updating the college's incident response plan.

2. **It appears that discussion about factors for making decisions about paying ransom has been limited.**

Mgmt. Response: Concur with recommendations. GFCMSU IT Services will partner with the college Executive Team to discuss, develop and document the college's response to paying a ransom due to a ransomware attack. Collaboration with MUS, State of Montana Risk Management and Tort Defense Division, to identify and document at least the basic factors to consider and a process for deciding if paying ransom is the best decision in the event of a major ransomware incident.

3. **IT incident response notifications to external contacts have not been sufficiently identified and listed.**

Mgmt. Response: Concur with recommendations. GFCMSU IT Services will document appropriate external contacts in appropriate locations, in the event of a ransomware incident.

IT Security Incident Response Process Should be Improved

Recommendation: OAS recommends that MSU make the following improvements in its IT incident response processes.

1. **The policy has not been reviewed.**

Mgmt. Response: Concur with recommendations. GFCMSU IT Services will review and update appropriate security incident policies.

2. **Campus procedures and training could be more formal and/or improved in some cases.**

Mgmt. Response: Concur with recommendations. GFCMSU IT Services will develop and document appropriate procedures and training.

3. **Policy and associated campus procedures formal testing or other exercises have not been conducted and/or documented.**

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student success and meeting the needs of our community.



Mgmt. Response: Concur with recommendations. GFCMSU IT Services will conduct security incident testing to demonstrate incident response policy and procedures. GFCMSU IT Services will develop and conduct formal test of the college's data backups.

FTC Red Flags Rule Compliance Programs Should be Formalized and Communicated

Recommendation: MSU campuses should establish and maintain programs and policies and, as necessary, train their staff to effectively implement applicable US Federal Trade Commission (FTC) Red Flags Rule and associated Board of Regents and MSU requirements.

Mgmt. Response: Concur with recommendations. The four MSU campuses will update or establish written identity theft policies and training programs to implement applicable US Federal Trade Commission Red Flag Rules and associated Board of Regents policies. – Carmen Roberts, 08-21-2021 email to OAS.