1.0 Purpose and Benefits of the Standard

Risk management is a critical component of any information security program. It helps ensure that any risk to confidentiality, integrity, and availability is identified, analyzed, and maintained at acceptable levels. Risk assessments allow management to prioritize and focus on areas that pose the greatest impact to critical and sensitive information assets. This provides the foundation for informed decision-making regarding information security.

Federal and State mandates require routine assessments to identify risk and ensure appropriate controls. Risk assessments allow alignment of information security with business objectives and regulatory requirements. Identifying information security risk and considering control requirements from the onset is essential, and far less costly than retrofitting or addressing the impact of a security incident.

This standard provides a risk management framework to evaluate current security posture, identify gaps, and determine appropriate actions.

2.0 Enterprise IT Policy/Standard Statement

Section 2 of Executive Order No. 117 provides the State Chief Information Officer, who also serves as director of the Office of Information Technology Services (ITS), the authority to oversee, direct and coordinate the establishment of information technology policies, protocols and standards for State government, including hardware, software, security and business re-engineering. Details regarding this authority can be found in NYS ITS Policy NYS-P08-002, Authority to Establish State Enterprise Information Technology (IT) Policy, Standards and Guidelines.
Except for terms defined in this policy, all terms shall have the meanings found in http://www.its.ny.gov/policy/glossary.htm.

3.0 Scope

This standard applies to all systems and processes that support State Entity (SE) business functions. This standard sets forth key principles of risk management and outlines the main process steps that must be performed to identify and understand risk so that the SE can make informed decisions.

4.0 Information Statement

Information security risk management takes into account vulnerabilities, threat sources, and security controls that are planned or in place. These inputs are used to determine the resulting level of risk posed to SE information, systems, processes, and individuals that support SE business functions.

While risk management and related assessment activities can take many forms (e.g., formal risk assessment, audits, security reviews, configuration analysis, vulnerability scanning and testing), all are aimed at the same goal - identifying and acting on risk to improve overall security posture.

It should be noted that an SE can never completely eliminate risk, but can take steps to manage risk.

As per the Information Security Policy, any system or process that supports SE business functions must be appropriately managed for risk and undergo risk assessments as part of its life cycle.

Risk Management Process:

The risk management process is iterative and should be followed throughout a system’s or process’s life cycle.

1. Frame Risk – The first step in managing risk is to:
   a. develop a strategy for conducting your risk assessment which considers assumptions, constraints, priorities, dependencies, tradeoffs and resources that will be used; and
   b. determine the SE’s risk tolerance, or the level of risk that is acceptable to the SE. For information security risk decisions that may affect multiple SEs, the lowest level of risk tolerance for those SEs must prevail. It is important that SEs recognize how fundamental this decision is to the risk management process. Risk tolerance is an executive-level decision and information technology (IT) staff should not be determining the risk tolerance for an SE.

2. Assess Risk – Assessing risk starts with identifying and classifying assets within scope. Risk is assessed by determining the threats and vulnerabilities to these assets, identifying the potential impact of each vulnerability being exploited, and determining the likelihood of
occurrence. A list of potential threats and vulnerabilities needs to be developed, and may come from preexisting resources.

It is important to note that the risk assessment process is comprehensive by intention, to assure due diligence, compliance, and proper documentation of security related controls and considerations.

Designing security into systems requires an investment of time and resources. The extent of the risk assessment should be commensurate with the classification (information sensitivity and system criticality) of the system/process and the risks this system/process introduces into the overall environment.

Types of information security risk assessments include, but are not limited to:

- Enterprise Risk Assessments – Assesses risks to core agency assets, operational processes, and functions;
- Physical Infrastructure Assets and Systems Risk Assessments – Identifies and assesses vulnerabilities and risks to core physical infrastructure assets and systems;
- Project Security Risk Assessments (New Applications) – Identifies and assesses new vulnerabilities introduced by newly developed IT applications or systems;
- Project Security Risk Assessments (New Risks) – Identifies and assesses new risks to existing components introduced by new technology or service offerings; and
- Change Request Risk Assessments – Assesses risk of change to ensure security is not compromised by the proposed change.

3. Respond to Risk – Once risk has been assessed, the SE must determine and implement the appropriate course of action. Options include:

   a. Risk Acceptance – This is a documented decision not to act on a given risk at a given time and place. It is not negligence or “inaction” and can be appropriate if the risk falls within the SE's risk tolerance level. For example, SEs may choose to accept the risk of an earthquake, based on a low likelihood in the Northeast of extensive damage and the high cost of controls.

   b. Risk Avoidance – These are specific actions taken to eliminate the activities or technologies that are the basis for the risk. This is appropriate when the identified risk exceeds the SE's risk tolerance, even after controls have been applied (i.e., residual risk). For example, if a connection between two networks includes unacceptable risks and the countermeasures are not practical, the SE may decide not to make the connection.

   c. Risk Mitigation/Reduction – These are specific actions taken to eliminate or reduce risk to an acceptable level. This is the most common approach and is appropriate where controls can reduce the identified risk. For example, to reduce the risk of network intrusion, an SE may choose to deploy a firewall.

   d. Risk Transfer/Sharing – These are specific actions taken to shift responsibility for the risk, in whole or in part, to a third party. This may be appropriate when it is
more cost effective to transfer the risk, or when a third party is better suited to manage the risk. For example, an SE may transfer risk through legal disclaimers or by outsourcing to a vendor or to the Office of Information Technology Services (ITS).

4. **Monitor Risk** — The SE must monitor the effectiveness of its risk response measures, by verifying that the controls put in place are implemented correctly and operating as intended. This must occur annually, at a minimum. In addition, the SE must have a process to alert it of significant changes in the factors it uses to assess its risk (e.g., assets, threats, controls, regulations, policies, risk tolerance). These changes may indicate a new assessment is needed.

### 5.0 Compliance

This standard shall take effect upon publication. The Policy Unit shall review the standard at least once every year to ensure relevancy. The Office may also assess agency compliance with this standard. To accomplish this assessment, ITS may issue, from time to time, requests for information to covered agencies, which will be used to develop any reporting requirements as may be requested by the NYS Chief Information Officer, the Executive Chamber or Legislative entities.

If compliance with this standard is not feasible or technically possible, or if deviation from this standard is necessary to support a business function, SEs shall request an exception through the Enterprise Information Security Office exception process.

### 6.0 Definitions of Key Terms

<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
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<tbody>
<tr>
<td><strong>Impact</strong></td>
<td>The magnitude of harm that could be caused by a threat.</td>
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<tr>
<td><strong>Risk Management</strong></td>
<td>A process that includes taking actions to assess risks and avoid or reduce risk to acceptable levels.</td>
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<td><strong>Residual Risk</strong></td>
<td>The remaining potential risks after all IT security measures are applied.</td>
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<tr>
<td><strong>Sensitivity</strong></td>
<td>A measure of the importance assigned to information by its owner, for the purpose of denoting its need for protection.</td>
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7.0 ITS Contact Information

Submit all inquiries and requests for future enhancements to the standard owner at:

Standard Owner
Attention: Enterprise Information Security Office
New York State Office of Information Technology Services
State Capitol, ESP, P.O. Box 2062
Albany, NY 12220
Telephone: (518) 242-5200
Facsimile: (518) 322-4976

Questions may also be directed to your ITS Customer Relations Manager at:
Customer.Relations@its.ny.gov

The State of New York Enterprise IT Policies may be found at the following website:
http://www.its.ny.gov/tables/technologypolicyindex.htm

8.0 Review Schedule and Revision History

<table>
<thead>
<tr>
<th>Date</th>
<th>Description of Change</th>
<th>Reviewer</th>
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<tbody>
<tr>
<td>01/17/2014</td>
<td>Original Standard Release</td>
<td>Thomas Smith, Chief Information Security Officer</td>
</tr>
<tr>
<td>01/16/2015</td>
<td>Standard Review – no changes</td>
<td>Deborah A. Snyder, Deputy Chief Information Security Officer</td>
</tr>
<tr>
<td>01/16/2016</td>
<td>Scheduled Standard Review</td>
<td></td>
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9.0 Related Documents

- NIST SP 800-30, Guide for Conducting Risk Assessments
- NIST SP 800-37, Guide for Applying the Risk Management Framework to Federal Information Systems
- NIST SP 800-39, Managing Information Security Risk