| METROPOLITAN GOVERNMENT OF NASHVILLE AND DAVIDSON COUNTY INFORMATION SECURITY POLICY | POLICY NUMBER: ISM 8 |
|--|--------------------------------|
| SUBJECT: RISK MANAGEMENT | DISTRIBUTION DATE: 6/1/2014 |
| | EFFECTIVE DATE: 6/1/2014 |
| ISSUING AUTHORITY: Director of Information Technology Services of the Metropolitan Government of Nashville and Davidson County | EXPIRATION: UNTIL RESCINDED |

PURPOSE

The purpose of this Policy is to ensure that the Metropolitan Government of Nashville and Davidson County (Metropolitan Government) properly inventories and manages its assets as an input to risk management, undertakes a risk assessment, treats identified risks and tracks risk as part of a risk management process.

POLICY

1. Information Systems Risk Management Strategy

Metropolitan Government shall:

- a) Develop a comprehensive strategy to manage risk to its operations and assets, individuals, other organizations, and the city associated with the operation and use of information systems; and
- b) Implement that strategy consistently across its departments, agencies and boards.

2. Risk Management Process

The Metropolitan Government information systems risk management process shall consist of: (i) context establishment; (ii) risk assessment; (iii) risk treatment; (iv) risk monitoring, review and tracking. Metropolitan Government shall assess risk to operations, assets and individuals from operation of information systems and associated processing, storage or transmission of information.

Metropolitan Government shall utilize appropriate industry-accepted standards, frameworks and guidance for its risk assessment and treatment program.

2.1. Context Establishment

Metropolitan Government shall

- a. Define scope of Risk Management activities at an appropriate level
- b. Perform information classification and asset categorization Within the scope defined above, the Metropolitan Government shall:
 - 1. Classify and categorize information and the information system as described in the *Information Classification Policy* and the *Inventory and Ownership of Assets Policy*.
 - 2. Document the classification/categorization results, including supporting rationale, in the security plan for the information system;
 - Ensure the classification/categorization decision is reviewed and approved by the director, head or chair of each Metropolitan Government department or agency; and
 - 4. Ensure that any risk rating assigned after a risk assessment is reviewed and approved by the director, head or chair of each Metropolitan Government department or agency.

2.2. Risk Assessment

Metropolitan Government shall:

- a. Undertake a risk assessment that identifies, quantifies the likelihood and magnitude of harm, and prioritizes risks against criteria for risk acceptance and objectives relevant to Metropolitan Government; and
- b. Document risk assessment results.

2.3. Risk Response

Metropolitan Government shall:

- a. Develop a comprehensive strategy to treat identified risks by: (i) applying appropriate controls to reduce the risks; (ii) knowingly and objectively accepting risks; (iii) avoiding risks by not allowing the actions that would cause the risks to occur; and (iv) transferring the associated risks to third parties (use of insurance).
- b. Monitor, evaluate, and improve the efficiency of security controls when risk mitigation is determined as the appropriate response.

2.4. Risk Monitoring, Review and Tracking

The directors, heads, and chairs of departments and agencies shall monitor, review and update the efficiency and effectiveness of risk mitigation strategies, including implemented security controls. At minimum, a group review by the Information Security Steering Committee shall occur at least annually of any high or extreme high risk, and these efforts will include, but are not limited to:

- a. Review effectiveness of risk assessment and response; and
- b. Update the risk assessment and response as set forth in the risk assessment activities procedures or whenever there are significant changes to the information system or environment of operation (including the identification of new threats and vulnerabilities), or other conditions that may impact the security state of the system.

3. Compliance Management

Metro Government shall identify all applicable legal, regulatory, statutory requirements, contractual obligations, policies and standards, and include these as inputs to risk assessments.

4. Roles and Responsibilities

Metro Government shall document the roles and responsibilities of the risk management function. These are included in the *Metropolitan Government Scope*, *Background and Governance Statement for Information Security Policies*.

5. Exception Handling

Metro Government shall develop a process for requesting, evaluating and tracking security exception requests. These requests shall be documented in the risk register.

SCOPE, BACKGROUND and GOVERNANCE

This information is set forth in the *Metropolitan Government Scope, Background and Governance Statement for Information Security Policies*.

DEFINITIONS

Terms used in this policy are defined in the Metropolitan Government Information Security Glossary.

CONTACT

Questions should be directed to (615) 862-6222 or by email at ciso@nashville.gov, or by mailing them to CISO, Information Technology Services Department, 700 2nd Avenue South, Suite 301, P. O. Box 196300, Nashville, TN 37219-6300

SIGNATURE

Keith Durbin, Chief Information Officer/Director of ITS Metropolitan Government of Nashville and Davidson County

REFERENCES

- ISO 27002: section 4 and ISO 27005 Clause 6
- NIST Special Publication 800-53 Rev5, Recommended Security Controls for Federal Information Systems and Organizations: RA-1, RA-2, RA-3, RA-4
- FIPS 200 Risk Assessment (RA) Minimum Security Requirements
- NIST Cybersecurity Framework ver. 2.0
- NIST Special Publication 800-171 rev. 3, Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations
- NIST Cybersecurity Framework ver. 2.0

REVISION HISTORY

| REVISION | APPROVAL DATE | CHANGES |
|----------|---------------|------------------------|
| 1.0 | 7/1/2011 | First released version |

| 2.0 | 6/1/2014 | Amended |
|-----|------------|--|
| 3.0 | 10/12/2018 | Policy changed to be risk management focused. |
| 3.1 | 8/29/2025 | Change to reflect use of rev 5 of NIST 800-53 as a reference |
| | | Change to reflect use of rev 2 of NIST Cybersecurity Framework |
| | | Change to reflect use of NIST 800-171 r3 as a reference |