



90-day recovery checklist for Scattered Spider incidents

Scattered Spider (AKA UNC3944) is a criminal group known for helpdesk-centric social engineering, credential theft, data extortion and ransomware [recently deploying DragonForce](#).

This checklist is a general outline intended to guide your organization through a 90-day recovery process after a Scattered Spider incident. We've divided it into phases and by stakeholder role, and

incorporates industry-specific compliance steps where applicable. We've also highlighted best practices (e.g. offline backups, phishing-resistant MFA) and regulatory timelines.



Immediate response | Days 1-3

Role/Stakeholder

Action checklist

Executive Leadership (CEO/CISO/Board)

Activate Incident Response (IR) plan and convene the incident command structure (CISO or designated Incident Manager) immediately.

Notify senior leadership/board about the breach and delegate authority for rapid decision-making.

Cybersecurity/IR Team

Confirm breach scope and contain the attack: isolate affected networks/systems (disable compromised accounts, block malicious IPs/domains, etc.).

Preserve evidence: collect forensic images of affected hosts, capture live memory, preserve logs with chain-of-custody.

Escalate to authorities: report the incident to CISA and FBI Cyber or local law enforcement as appropriate.

IT/Infrastructure Operations

Implement emergency fixes: enforce network segmentation, disable exposed remote access (VPN/RDP), and change administrative passwords immediately.

Safeguard backups: ensure all critical data backups are offline/immutable (physically separate storage), to preserve clean copies.

Legal/Compliance

Engage counsel (internal & external) to advise on legal obligations. Identify and prioritize breach notification requirements under sector laws (e.g. HIPAA, GLBA, FISMA, state breach laws, SEC rules).

Record details: Document the incident timeline and affected data; preserve communications and evidence for investigations and potential litigation.

Invoke any Cyber Insurance process and requirements.

Communications & Public Affairs

Internal notification: Inform employees and key stakeholders of the incident status with approved messaging. Prepare a "holding statement" for the press if needed.

Media monitoring: Assign PR team to track rumors or media queries; coordinate with legal to control messaging.

Threat Intelligence/Sharing

Collect Indicators of Compromise (IoCs) from affected systems (IPs, domains, hashes, etc.).

Share and consume threat intel: Report IoCs/TTPs to industry ISACs (e.g. FS-ISAC, H-ISAC), CISA AIS/JCDC and law enforcement (FBI/CISA) to seek guidance and assist collective defense. Begin coordinating with peer organizations on intelligence.

Monitor for signs of the attackers posting about the breach on dark web sites or other forums.



Short-term recovery | Days 4-30

Role/Stakeholder

Action checklist

Executive Leadership/ CISO

Oversee full investigation and recovery: Ensure IR team and IT have necessary resources (budget, tools, external expertise, e.g. forensic consultants or Incident Response vendors) to complete containment and remediation.

Coordinate with regulators/insurers: Notify cyber insurers and prepare for potential regulatory reports. Update senior stakeholders (board, regulators) on progress in line with disclosure rules (e.g. SEC Form 8-K if public).

Cybersecurity/ IR Team

Forensics and eradication: Perform deep forensic analysis to identify root cause and scope (e.g. compromised user accounts, malicious services), remove malware/backdoors, and repoint or rebuild affected systems.

Harden authentication: Reset all potentially compromised credentials, enforce strong, phishing-resistant MFA (FIDO/WebAuthn or certificate-based) especially for privileged accounts.

Continuous monitoring: Enhance logs and alerts to detect any indication that the attacker has retained persistent access; resume vigilant 24x7 SOC monitoring of critical assets.

IT/Operations

Restore systems/services: Rebuild or restore affected servers and network devices from secure backups. Verify integrity of backups before use.

Patching and configuration: Apply critical patches (especially known exploited vulnerabilities) to all systems. Disable unnecessary services/ports. Implement network segmentation to limit future spread.

Legal/ Compliance

Regulatory notifications: Finalize and submit required breach reports:

HIPAA: Notify HHS OCR and affected individuals without unreasonable delay (no later than 60 days).

GLBA/FTC: If a financial institution, notify FTC (and impacted customers per state law) within 30 days for breaches of 500+ records.

SEC: Public companies should consider SEC rules – file Form 8-K (Item 1.05) for material incidents (or Item 8.01 if still assessing materiality) within required timeframes.

Law enforcement liaison: Coordinate additional information requests from FBI/CISA and comply with their investigation. Maintain a strict chain of custody documentation for evidence.

Communications/ PR

Stakeholder updates: Provide interim briefings to customers, partners and media (if breached data is public) under guidance of legal. Use clear, factual language to maintain trust.

Messaging strategy: Draft more detailed press release or customer notification as facts solidify. Prepare Q&A sheets for executives. Continue to monitor and correct misinformation.

Threat Intelligence/ Sharing

Industry collaboration: Participate in ISAC/ISAO threat calls (e.g. joint healthcare or financial task forces) to share lessons learned and gather additional context on the attacker's actions.

Indicator dissemination: Feed sanitized IoCs and TTPs into security tools and threat platforms, and share with peers (e.g. via AIS). Work with vendors (EDR, SIEM) to tune detections for Scattered Spider activity.

Continue monitoring dark web forums



Medium-term recovery | Days 31-60

Role/Stakeholder

Action checklist

Executive
Leadership/
CISO

Review incident impact: Assess business and reputational damage. Update enterprise risk and cybersecurity strategy to reflect lessons (e.g. increased phishing resilience, helpdesk security).

Board and regulator reporting: Provide final summaries to the board and regulators. Ensure any contractual or legal obligations (e.g. investor disclosures, audit findings) are addressed.

Cybersecurity/
IR Team

Verify full recovery: Confirm all compromised systems have been rebuilt or cleaned and that no malware persists. Increase network and endpoint monitoring for any sign of residual compromise.

Security audit and hardening: Perform thorough audits of account privileges and network segmentation. Implement recommended mitigations (e.g. block unapproved remote access tools, enforce policy on portable executable use).

IT/Operations

Long-term restorations: Complete restoration of remaining systems/services. Test applications and data access for all user groups.

Disaster recovery (DR) exercises: Conduct DR drills using the lessons from this incident (e.g. restore operations from backups). Refine DR/BC plans.

Legal/
Compliance

Regulatory follow-up: Submit any supplemental breach reports (e.g. annual updates for HIPAA if under 500 records). Coordinate with regulators on any required audits (e.g. HHS OCR requests, FTC inquiries).

Compliance program updates: Review and update security policies and incident response plan based on what was learned. Ensure contracts (business associates, vendors) have appropriate incident-notification clauses.

Communications/
PR

Final communications: If needed, issue a final public report or statement detailing incident resolution and steps taken. Highlight improvements to reassure customers and stakeholders.

Brand rehabilitation: Plan longer-term communication efforts (e.g. customer reassurance campaigns, updated FAQs, enhanced transparency) to rebuild trust.

Threat
Intelligence
& Training

Lessons learned workshop: Organize a cross-functional “lessons learned” meeting (mandatory for major incidents) to review what went well and gaps in response. Document these findings in an after-action report.

Security training: Roll out targeted training (e.g. advanced phishing social engineering scenarios) for staff, especially helpdesk/IT personnel, emphasizing recent tactics like MFA fatigue and SIM-swapping.



Long-term recovery and resilience | Days 61-90

Role/Stakeholder

Action checklist

**Executive Leadership/
CISO**

Implement improvements: Ensure all recommendations from the lessons-learned report are funded and tracked (e.g. stronger identity management, helpdesk authentication protocols).

Governance and audit: Present a final incident review to the board/executive committee. Verify that all regulatory and insurance requirements have been closed out.

**Cybersecurity/
IR Team**

Post-incident audit: Commission an external security assessment (pen-test or red team) to validate that vulnerabilities exploited by the threat actor have been remediated.

IR plan update: Revise the incident response plan and playbooks incorporating new threat intelligence. Conduct a tabletop exercise simulating the attack to test readiness.

IT/Operations

Backup validation: Ensure backup/restore procedures are fully documented and tested end-to-end; encrypt and protect backup media. Maintain offline backups per best practices.

Technology upgrades: Replace or upgrade any outdated or “living off the land” tools identified (e.g. legacy remote-admin software), and strengthen network segmentation (micro-segmentation, Zero Trust).

**Legal/
Compliance**

Closing compliance loop: Finalize any remaining breach notification obligations (e.g. state laws). Prepare for potential regulatory investigations (have documentation ready).

Audit readiness: Schedule a compliance audit (HIPAA, GLBA, FISMA, etc.) incorporating incident findings to demonstrate remediation. Review FedRAMP continuous monitoring reports if applicable.

**Communications/
PR**

Reputation management: Continue engaging customers and media with updates on security improvements. Publish lessons learned or case studies (redacted) in industry forums if permitted.

Share success stories: Highlight how the organization has become more resilient (e.g. adoption of phishing-resistant MFA) to improve public confidence.

**Threat Intelligence
& Training**

Information sharing: Provide anonymized incident data (e.g. IOCs, TTPs summary) to ISACs, CISA, FBI and peer organizations to strengthen collective defenses.

Ongoing vigilance: Remain alert for Scattered Spider or similar groups leveraging discovered methods. Update threat feeds and SIEM with custom signatures for any newly identified attack patterns.