

## Standard Development Timeline

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*This section is maintained by the drafting team during the development of the standard and will be removed when the standard becomes effective.*

### Development Steps Completed

1. SAR posted for comment on January 15, 2014
2. Standard Drafting Team appointed on January 29, 2014
3. First 45-Day Comment and Ballot Period concluded on July 16, 2014 with all revisions addressing FERC No. 791 directives
4. Additional 45-Day Comment Period and Ballot concluded on October 17, 2014

### Description of Current Draft

This draft standard is being posted for final ballot. The draft includes modifications to meet the FERC Order No. 791 directives.

Anticipated Actions	Anticipated Date
Final Ballot is Conducted	October 2014
Board of Trustees (Board) Adoption	November 2014
Filing to Applicable Regulatory Authorities	December 2014

## Version History

Version	Date	Action	Change Tracking
1	1/16/06	R3.2 — Change “Control Center” to “control center.”	3/24/06
2	9/30/09	<p>Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards.</p> <p>Removal of reasonable business judgment.</p> <p>Replaced the RRO with the RE as a responsible entity.</p> <p>Rewording of Effective Date.</p> <p>Changed compliance monitor to Compliance Enforcement Authority.</p>	
3	12/16/09	<p>Updated Version Number from -2 to -3</p> <p>In Requirement 1.6, deleted the sentence pertaining to removing component or system from service in order to perform testing, in response to FERC order issued September 30, 2009.</p>	
3	12/16/09	Approved by the NERC Board of Trustees.	
3	3/31/10	Approved by FERC.	
4	1/24/11	Approved by the NERC Board of Trustees.	
5	11/26/12	Adopted by the NERC Board of Trustees.	Modified to coordinate with other CIP standards and to revise format to use RBS Template.
5	11/22/13	FERC Order issued approving CIP-003-5.	

*When this standard has received ballot approval, the text boxes will be moved to the Application Guidelines Section of the Standard.*

## **A. Introduction**

- 1. Title:** Cyber Security — Security Management Controls
- 2. Number:** CIP-003-6
- 3. Purpose:** To specify consistent and sustainable security management controls that establish responsibility and accountability to protect Bulk Electric System (BES) Cyber Systems against compromise that could lead to misoperation or instability in the BES.
- 4. Applicability:**
  - 4.1. Functional Entities:** For the purpose of the requirements contained herein, the following list of functional entities will be collectively referred to as “Responsible Entities.” For requirements in this standard where a specific functional entity or subset of functional entities are the applicable entity or entities, the functional entity or entities are specified explicitly.
    - 4.1.1 Balancing Authority**
    - 4.1.2 Distribution Provider** that owns one or more of the following Facilities, systems, and equipment for the protection or restoration of the BES:
      - 4.1.2.1** Each underfrequency Load shedding (UFLS) or undervoltage Load shedding (UVLS) system that:
        - 4.1.2.1.1** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and
        - 4.1.2.1.2** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.
      - 4.1.2.2** Each Special Protection System (SPS) or Remedial Action Scheme (RAS) where the SPS or RAS is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.3** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.
      - 4.1.2.4** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.
    - 4.1.3 Generator Operator**
    - 4.1.4 Generator Owner**

**4.1.5 Interchange Coordinator or Interchange Authority**

**4.1.6 Reliability Coordinator**

**4.1.7 Transmission Operator**

**4.1.8 Transmission Owner**

**4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.

**4.2.1 Distribution Provider:** One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:

**4.2.1.1** Each UFLS or UVLS System that:

**4.2.1.1.1** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and

**4.2.1.1.2** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

**4.2.1.2** Each SPS or RAS where the SPS or RAS is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.3** Each Protection System (excluding UFLS and UVLS) that applies to Transmission where the Protection System is subject to one or more requirements in a NERC or Regional Reliability Standard.

**4.2.1.4** Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

**4.2.2 Responsible Entities listed in 4.1 other than Distribution Providers:**

All BES Facilities.

**4.2.3 Exemptions:** The following are exempt from Standard CIP-003-6:

**4.2.3.1** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.

**4.2.3.2** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.

**4.2.3.3** The systems, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.

**4.2.3.4** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.

**5. Effective Dates:**

See Implementation Plan for CIP-003-6.

**6. Background:**

Standard CIP-003 exists as part of a suite of CIP Standards related to cyber security, which require the initial identification and categorization of BES Cyber Systems and require a minimum level of organizational, operational, and procedural controls to mitigate risk to BES Cyber Systems.

The term *documented processes* refers to a set of required instructions specific to the Responsible Entity and to achieve a specific outcome. This term does not imply any naming or approval structure beyond what is stated in the requirements. An entity should include as much as it believes necessary in its documented processes, but it must address the applicable requirements.

The terms *program* and *plan* are sometimes used in place of *documented processes* where it makes sense and is commonly understood. For example, documented processes describing a response are typically referred to as *plans* (i.e., incident response plans and recovery plans). Likewise, a security plan can describe an approach involving multiple procedures to address a broad subject matter.

Similarly, the term *program* may refer to the organization's overall implementation of its policies, plans, and procedures involving a subject matter. Examples in the standards include the personnel risk assessment program and the personnel training program. The full implementation of the CIP Cyber Security Reliability Standards could also be referred to as a program. However, the terms *program* and *plan* do not imply any additional requirements beyond what is stated in the standards.

Responsible Entities can implement common controls that meet requirements for multiple high and medium impact BES Cyber Systems. For example, a single training program could meet the requirements for training personnel across multiple BES Cyber Systems.

Measures provide examples of evidence to show documentation and implementation of the requirement. These measures serve to provide guidance to entities in acceptable records of compliance and should not be viewed as an all-inclusive list.

Throughout the standards, unless otherwise stated, bulleted items in the requirements and measures are items that are linked with an "or," and numbered items are items that are linked with an "and."

Many references in the Applicability section use a threshold of 300 MW for UFLS and UVLS. This particular threshold of 300 MW for UVLS and UFLS was provided in Version 1 of the CIP Cyber Security Standards. The threshold remains at 300 MW since it is specifically addressing UVLS and UFLS, which are last ditch efforts to save

the BES. A review of UFLS tolerances defined within Regional Reliability Standards for UFLS program requirements to date indicates that the historical value of 300 MW represents an adequate and reasonable threshold value for allowable UFLS operational tolerances.

## B. Requirements and Measures

### **Rationale for Requirement R1:**

One or more security policies enable effective implementation of the requirements of the standard. The purpose of policies is to provide a management and governance foundation for all requirements that apply to personnel who have authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems. The Responsible Entity can demonstrate through its policies that its management supports the accountability and responsibility necessary for effective implementation of the requirements of the standard.

Annual review and approval of the cyber security policy ensures that the policy is kept up-to-date and periodically reaffirms management's commitment to the protection of its BES Cyber Systems.

- R1.** Each Responsible Entity, for its high impact and medium impact BES Cyber Systems, shall review and obtain CIP Senior Manager approval at least once every 15 calendar months for one or more documented cyber security policies that collectively address the following topics: *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*
  - 1.1** Personnel & training (CIP-004);
  - 1.2** Electronic Security Perimeters (CIP-005) including Interactive Remote Access;
  - 1.3** Physical security of BES Cyber Systems (CIP-006);
  - 1.4** System security management (CIP-007);
  - 1.5** Incident reporting and response planning (CIP-008);
  - 1.6** Recovery plans for BES Cyber Systems (CIP-009);
  - 1.7** Configuration change management and vulnerability assessments (CIP-010);
  - 1.8** Information protection (CIP-011); and
  - 1.9** Declaring and responding to CIP Exceptional Circumstances.
- M1.** Examples of evidence may include, but are not limited to, policy documents; revision history, records of review, or workflow evidence from a document management system that indicate review of each cyber security policy at least once every 15 calendar months; and documented approval by the CIP Senior Manager for each cyber security policy.

**Rationale for Requirement R2:**

One or more security policies enable effective implementation of the requirements of the standard. The purpose of policies is to provide a management and governance foundation for all requirements that apply to personnel who have authorized electronic access and/or authorized unescorted physical access to low impact BES Cyber Systems. The Responsible Entity can demonstrate through its policies that its management supports the accountability and responsibility necessary for effective implementation of the requirements of the standard.

The language in Requirement R2, Part 2.3 “. . . for external routable protocol connections and Dial-up Connectivity . . .” was included to acknowledge the support given in FERC Order No. 761, paragraph 87, for electronic security perimeter protections “of some form” to be applied to all BES Cyber Systems, regardless of impact. Part 2.3 uses the phrase “external routable protocol connections” instead of the defined term “External Routable Connectivity,” because the latter term has very specific connotations relating to Electronic Security Perimeters and high and medium impact BES Cyber Systems. Using the glossary term “External Routable Connectivity” in the context of Requirement R2 would not be appropriate because Requirement R2 is limited in scope to low impact BES Cyber Systems.

- R2.** Each Responsible Entity for its assets identified in CIP-002-5.1, Requirement R1, Part R1.3, shall implement one or more documented cyber security policies that collectively address the following topics, and review and obtain CIP Senior Manager approval for those policies at least once every 15 calendar months: *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*
- 2.1** Cyber security awareness;
  - 2.2** Physical security controls;
  - 2.3** Electronic access controls for external routable protocol connections and Dial-up Connectivity; and
  - 2.4** Incident response to a Cyber Security Incident.
- An inventory, list, or discrete identification of low impact BES Cyber Systems or their BES Cyber Assets is not required.
- M2.** Examples of evidence may include, but are not limited to, one or more documented cyber security policies and evidence of processes, procedures, or plans that demonstrate the implementation of the required topics; revision history, records of review, or workflow evidence from a document management system that indicate review of each cyber security policy at least once every 15 calendar months; and documented approval by the CIP Senior Manager for each cyber security policy.

### **Rationale for Requirement R3:**

The identification and documentation of the single CIP Senior Manager ensures that there is clear authority and ownership for the CIP program within an organization, as called for in Blackout Report Recommendation 43. The language that identifies CIP Senior Manager responsibilities is included in the *Glossary of Terms used in NERC Reliability Standards* so that it may be used across the body of CIP standards without an explicit cross-reference.

FERC Order No. 706, Paragraph 296, requests consideration of whether the single senior manager should be a corporate officer or equivalent. As implicated through the defined term, the senior manager has “the overall authority and responsibility for leading and managing implementation of the requirements within this set of standards” which ensures that the senior manager is of sufficient position in the Responsible Entity to ensure that cyber security receives the prominence that is necessary. In addition, given the range of business models for responsible entities, from municipal, cooperative, federal agencies, investor owned utilities, privately owned utilities, and everything in between, the SDT believes that requiring the CIP Senior Manager to be a “corporate officer or equivalent” would be extremely difficult to interpret and enforce on a consistent basis.

- R3.** Each Responsible Entity shall identify a CIP Senior Manager by name and document any change within 30 calendar days of the change. [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]
- M3.** An example of evidence may include, but is not limited to, a dated and approved document from a high level official designating the name of the individual identified as the CIP Senior Manager.

### **Rationale for Requirement R4:**

The intent of the requirement is to ensure clear accountability within an organization for certain security matters. It also ensures that delegations are kept up-to-date and that individuals do not assume undocumented authority.

In FERC Order No. 706, Paragraphs 379 and 381, the Commission notes that Recommendation 43 of the 2003 Blackout Report calls for “clear lines of authority and ownership for security matters.” With this in mind, the Standard Drafting Team has sought to provide clarity in the requirement for delegations so that this line of authority is clear and apparent from the documented delegations.

- R4.** The Responsible Entity shall implement a documented process to delegate authority, unless no delegations are used. Where allowed by the CIP Standards, the CIP Senior Manager may delegate authority for specific actions to a delegate or delegates. These delegations shall be documented, including the name or title of the delegate, the

specific actions delegated, and the date of the delegation; approved by the CIP Senior Manager; and updated within 30 days of any change to the delegation. Delegation changes do not need to be reinstated with a change to the delegator. *[Violation Risk Factor: Lower] [Time Horizon: Operations Planning]*

- M4.** An example of evidence may include, but is not limited to, a dated document, approved by the CIP Senior Manager, listing individuals (by name or title) who are delegated the authority to approve or authorize specifically identified items.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority:

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention:

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

- Each Responsible Entity shall retain evidence of each requirement in this standard for three calendar years.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.
- The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

#### 1.3. Compliance Monitoring and Assessment Processes:

Compliance Audits

Self-Certifications

Spot Checking

Compliance Violation Investigations

Self-Reporting

Complaints

#### 1.4. Additional Compliance Information:

None

2. Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1</b>	<b>Operations Planning</b>	<b>Medium</b>	<p>The Responsible Entity documented and implemented one or more cyber security policies for its high impact and medium impact BES Cyber Systems, but did not address one of the nine topics required by R1. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 within 15 calendar months but did complete this review</p>	<p>The Responsible Entity documented and implemented one or more cyber security policies for its high impact and medium impact BES Cyber Systems, but did not address two of the nine topics required by R1. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 within 16 calendar months but did complete this review</p>	<p>The Responsible Entity documented and implemented one or more cyber security policies for its high impact and medium impact BES Cyber Systems, but did not address three of the nine topics required by R1. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 within 17 calendar months but did complete this review in less than or equal to 18</p>	<p>The Responsible Entity documented and implemented one or more cyber security policies for its high impact and medium impact BES Cyber Systems, but did not address four or more of the nine topics required by R1. (R1)</p> <p>OR</p> <p>The Responsible Entity did not have any documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1. (R1)</p> <p>OR</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			<p>in less than or equal to 16 calendar months of the previous review. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its approval of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 by the CIP Senior Manager or delegate within 15 calendar months but did complete this approval in less than or equal to 16 calendar months of the previous approval. (R1)</p>	<p>in less than or equal to 17 calendar months of the previous review. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its approval of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 by the CIP Senior Manager or delegate within 16 calendar months but did complete this approval in less than or equal to 17 calendar months of the previous approval. (R1)</p>	<p>calendar months of the previous review. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its approval of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 by the CIP Senior Manager or delegate within 17 calendar months but did complete this approval in less than or equal to 18 calendar months of the previous approval. (R1)</p>	<p>The Responsible Entity did not complete its review of the one or more documented cyber security policies as required by R1 within 18 calendar months of the previous review. (R1)</p> <p>OR</p> <p>The Responsible Entity did not complete its approval of the one or more documented cyber security policies for its high impact and medium impact BES Cyber Systems as required by R1 by the CIP Senior Manager or delegate within 18 calendar months of the</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
						previous approval. (R1)
<b>R2</b>	<b>Operations Planning</b>	<b>Lower</b>	<p>The Responsible Entity had one or more documented cyber security policies for assets with a low impact rating but failed to address one of the topics as required by Requirement R2. (R2)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 within 15 calendar months but did complete this review</p>	<p>The Responsible Entity had one or more documented cyber security policies for assets with a low impact rating but failed to address two of the topics as required by Requirement R2. (R2)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 within 16 calendar months but did</p>	<p>The Responsible Entity had one or more documented cyber security policies for assets with a low impact rating but failed to address three of the topics as required by Requirement R2. (R2)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 within 17 calendar months but did complete this review in less than or equal to 18 calendar months of the previous review. (R2)</p>	<p>The Responsible Entity did not have any documented cyber security policies for assets with a low impact rating that address the topics as required by Requirement R2. (R2)</p> <p>OR</p> <p>The Responsible Entity did not complete its review of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 within 18 calendar</p>

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			in less than or equal to 16 calendar months of the previous review. (R2) OR The Responsible Entity did not complete its approval of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 by the CIP Senior Manager within 15 calendar months but did complete this approval in less than or equal to 16 calendar months of the previous approval. (R2)	complete this review in less than or equal to 17 calendar months of the previous review. (R2) OR The Responsible Entity did not complete its approval of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 by the CIP Senior Manager within 16 calendar months but did complete this approval in less than or equal to 17 calendar months of the previous approval. (R2)	OR The Responsible Entity did not complete its approval of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 by the CIP Senior Manager within 17 calendar months but did complete this approval in less than or equal to 18 calendar months of the previous approval. (R2)	months of the previous review. (R2) OR The Responsible Entity did not complete its approval of the one or more documented cyber security policies for assets with a low impact rating as required by Requirement R2 by the CIP Senior Manager within 18 calendar months of the previous approval. (R2)

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R3</b>	<b>Operations Planning</b>	<b>Medium</b>	The Responsible Entity has identified by name a CIP Senior Manager, but did not document changes to the CIP Senior Manager within 30 calendar days but did document this change in less than 40 calendar days of the change. (R3)	The Responsible Entity has identified by name a CIP Senior Manager, but did not document changes to the CIP Senior Manager within 40 calendar days but did document this change in less than 50 calendar days of the change. (R3)	The Responsible Entity has identified by name a CIP Senior Manager, but did not document changes to the CIP Senior Manager within 50 calendar days but did document this change in less than 60 calendar days of the change. (R3)	The Responsible Entity has not identified, by name, a CIP Senior Manager.  OR The Responsible Entity has identified by name a CIP Senior Manager, but did not document changes to the CIP Senior Manager within 60 calendar days of the change. (R3)
<b>R4</b>	<b>Operations Planning</b>	<b>Lower</b>	The Responsible Entity has identified a delegate by name, title, date of delegation, and specific actions delegated, but did not document changes to the delegate within 30	The Responsible Entity has identified a delegate by name, title, date of delegation, and specific actions delegated, but did not document changes to the delegate within 40	The Responsible Entity has identified a delegate by name, title, date of delegation, and specific actions delegated, but did not document changes to the delegate within 50 calendar days but did document this change in less than 60	The Responsible Entity has used delegated authority for actions where allowed by the CIP Standards, but does not have a process to delegate actions

R #	Time Horizon	VRF	Violation Severity Levels (CIP-003-6)			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
			calendar days but did document this change in less than 40 calendar days of the change. (R4)	calendar days but did document this change in less than 50 calendar days of the change. (R4)	calendar days of the change. (R4)	from the CIP Senior Manager. (R4)  OR The Responsible Entity has identified a delegate by name, title, date of delegation, and specific actions delegated, but did not document changes to the delegate within 60 calendar days of the change. (R4)

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

## Guidelines and Technical Basis

### Section 4 – Scope of Applicability of the CIP Cyber Security Standards

Section “4. Applicability” of the standards provides important information for Responsible Entities to determine the scope of the applicability of the CIP Cyber Security Requirements.

Section “4.1. Functional Entities” is a list of NERC functional entities to which the standard applies. If the entity is registered as one or more of the functional entities listed in Section 4.1, then the NERC CIP Cyber Security Standards apply. Note that there is a qualification in Section 4.1 that restricts the applicability in the case of Distribution Providers to only those that own certain types of systems and equipment listed in 4.2.

Section “4.2. Facilities” defines the scope of the Facilities, systems, and equipment owned by the Responsible Entity, as qualified in Section 4.1, that is subject to the requirements of the standard. In addition to the set of BES Facilities, Control Centers, and other systems and equipment, the list includes the set of systems and equipment owned by Distribution Providers. While the NERC Glossary term “Facilities” already includes the BES characteristic, the additional use of the term BES here is meant to reinforce the scope of applicability of these Facilities where it is used, especially in this applicability scoping section. This in effect sets the scope of Facilities, systems, and equipment that is subject to the standards.

#### Requirement R1:

The number of policies and their specific language are guided by a Responsible Entity's management structure and operating conditions. Policies might be included as part of a general information security program for the entire organization, or as components of specific programs. The cyber security policy must cover in sufficient detail the nine topical areas required by CIP-003-6, Requirement R1. The Responsible Entity has the flexibility to develop a single comprehensive cyber security policy covering these topics, or it may choose to develop a single high-level umbrella policy and provide additional policy detail in lower level documents in its documentation hierarchy. In the case of a high-level umbrella policy, the Responsible Entity would be expected to provide the high-level policy as well as the additional documentation in order to demonstrate compliance with CIP-003-6, Requirement R1. Implementation of the cyber security policy is not specifically included in CIP-003-6, Requirement R1 as it is envisioned that the implementation of this policy is evidenced through successful implementation of CIP-004 through CIP-011. However, Responsible Entities are encouraged not to limit the scope of their cyber security policies to only those requirements from CIP-004 through CIP-011, but rather to put together a holistic cyber security policy appropriate for its organization. The assessment through the Compliance Monitoring and Enforcement Program of policy items that extend beyond the scope of CIP-004 through CIP-011 should not be considered candidates for potential violations. The Responsible Entity should consider the following for each of the required topics in its cyber security policy:

#### 1.1 Personnel & training (CIP-004)

- Organization position on acceptable background investigations
- Identification of possible disciplinary action for violating this policy
- Account management

### 1.2 Electronic Security Perimeters (CIP-005) including Interactive Remote Access

- Organization stance on use of wireless networks
- Identification of acceptable authentication methods
- Identification of trusted and untrusted resources
- Monitoring and logging of ingress and egress at Electronic Access Points
- Maintaining up-to-date anti-malware software before initiating Interactive Remote Access
- Maintaining up-to-date patch levels for operating systems and applications used to initiate Interactive Remote Access
- Disabling VPN “split-tunneling” or “dual-homed” workstations before initiating Interactive Remote Access
- For vendors, contractors, or consultants: include language in contracts that requires adherence to the Responsible Entity’s Interactive Remote Access controls

### 1.3 Physical security of BES Cyber Systems (CIP-006)

- Strategy for protecting Cyber Assets from unauthorized physical access
- Acceptable physical access control methods
- Monitoring and logging of physical ingress

### 1.4 System security management (CIP-007)

- Strategies for system hardening
- Acceptable methods of authentication and access control
- Password policies including length, complexity, enforcement, prevention of brute force attempts
- Monitoring and logging of BES Cyber Systems

### 1.5 Incident reporting and response planning (CIP-008)

- Recognition of Cyber Security Incidents
- Appropriate notifications upon discovery of an incident
- Obligations to report Cyber Security Incidents

### 1.6 Recovery plans for BES Cyber Systems (CIP-009)

- Availability of spare components

- Availability of system backups

### 1.7 Configuration change management and vulnerability assessments (CIP-010)

- Initiation of change requests
- Approval of changes
- Break-fix processes

### 1.8 Information protection (CIP-011)

- Information access control methods
- Notification of unauthorized information disclosure
- Information access on a need-to-know basis

### 1.9 Declaring and responding to CIP Exceptional Circumstances

- Processes to invoke special procedures in the event of a CIP Exceptional Circumstance
- Processes to allow for exceptions to policy that do not violate CIP requirements

The Standard Drafting Team (SDT) has removed requirements relating to exceptions to a Responsible Entity's security policies since it is a general management issue that is not within the scope of a reliability requirement. The SDT considers it to be an internal policy requirement and not a reliability requirement. However, the SDT encourages Responsible Entities to continue this practice as a component of its cyber security policy.

In this and all subsequent required approvals in the NERC CIP Reliability Standards, the Responsible Entity may elect to use hardcopy or electronic approvals to the extent that there is sufficient evidence to ensure the authenticity of the approving party.

#### **Requirement R2:**

As with Requirement R1, the number of policies and their specific language would be guided by a Responsible Entity's management structure and operating conditions. Policies might be included as part of a general information security program for the entire organization or as components of specific programs. The cyber security policy must cover in sufficient detail the four topical areas required by CIP-003-6, Requirement R2. The Responsible Entity has flexibility to develop a single comprehensive cyber security policy covering these topics, or it may choose to develop a single high-level umbrella policy and provide additional policy detail in lower level documents in its documentation hierarchy. In the case of a high-level umbrella policy, the Responsible Entity would be expected to provide the high-level policy as well as the additional documentation in order to demonstrate compliance with CIP-003-6, Requirement R2. The intent of the requirement is to outline a set of basic protections that all low impact BES Cyber Systems should receive without requiring a significant administrative and compliance overhead. The SDT intends that demonstration of this requirement can be reasonably accomplished through providing evidence of related processes, procedures, or plans. While the audit staff may choose to review an example low impact BES Cyber System, the SDT believes strongly that the current method (as of this writing) of reviewing a statistical sample of systems is not

necessary. The SDT also notes that in topic 2.3, the SDT uses the term “electronic access control” in the general sense, i.e., to control access, and not in the specific technical sense requiring authentication, authorization, and auditing.

### **Requirement R3:**

The intent of CIP-003-6, Requirement R3 is effectively unchanged since prior versions of the standard. The specific description of the CIP Senior Manager has now been included as a defined term rather than clarified in the Standard itself to prevent any unnecessary cross-reference to this standard. It is expected that the CIP Senior Manager will play a key role in ensuring proper strategic planning, executive/board-level awareness, and overall program governance.

### **Requirement R4:**

As indicated in the rationale for CIP-003-6, Requirement R4, this requirement is intended to demonstrate a clear line of authority and ownership for security matters. The intent of the SDT was not to impose any particular organizational structure, but, rather, the intent is to afford the Responsible Entity significant flexibility to adapt this requirement to its existing organizational structure. A Responsible Entity may satisfy this requirement through a single delegation document or through multiple delegation documents. The Responsible Entity can make use of the delegation of the delegation authority itself to increase the flexibility in how this applies to its organization. In such a case, delegations may exist in numerous documentation records as long as the collection of these documentation records shows a clear line of authority back to the CIP Senior Manager. In addition, the CIP Senior Manager could also choose not to delegate any authority and meet this requirement without such delegation documentation.

The Responsible Entity must keep its documentation of the CIP Senior Manager and any delegations up-to-date. This is to ensure that individuals do not assume any undocumented authority. However, delegations do not have to be re-instated if the individual who delegated the task changes roles or the individual is replaced. For instance, assume that John Doe is named the CIP Senior Manager and he delegates a specific task to the Substation Maintenance Manager. If John Doe is replaced as the CIP Senior Manager, the CIP Senior Manager documentation must be updated within the specified timeframe, but the existing delegation to the Substation Maintenance Manager remains in effect as approved by the previous CIP Senior Manager, John Doe.