# **Standard Development Timeline**

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

# **Description of Current Draft**

This draft standard is being posted for an initial comment and ballot. The draft includes modifications to meet the directives of FERC Order No. 791.

Anticipated Actions	Anticipated Date
First 45-Day Comment Period Opens	June 2014
Additional 45-Day Comment Period (if necessary)	August 2014
Final Ballot is Conducted	October/November 2014
Board of Trustees (Board) Adoption	November 2014
Filing to Applicable Regulatory Authorities	December 2014

June 2, 2014 Page 1 of 46

# **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	Modifications to clarify the requirements and to bring the compliance elements into conformance with the latest guidelines for developing compliance elements of standards.	
		Removal of reasonable business judgment.	
		Replaced the RRO with the RE as a responsible entity.	
		Rewording of Effective Date.	
		Changed compliance monitor to Compliance Enforcement Authority.	
3	12/16/09	Updated Version Number from -2 to -3	
		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.	
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-004-5.	
6	June 2014	Responding to FERC Order No. 791.	Revised

June 2, 2014 Page 2 of 46

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 — Personnel & Training

**2. Number:** CIP-004-6

**3. Purpose:** To minimize the risk against compromise that could lead to misoperation or instability in the BES from individuals accessing BES Cyber Systems by requiring an appropriate level of personnel risk assessment, training, and security awareness in support of protecting BES Cyber Systems.

# 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 or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme 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

June 2, 2014 Page 3 of 46

- 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 BFS:
    - **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 Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme 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-004-6:
  - **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.

June 2, 2014 Page 4 of 46

- **4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.
- **4.2.3.5.** Responsible Entities that identify that they have no BES Cyber Systems categorized as high impact or medium impact according to the CIP-002-5.1 identification and categorization processes.

#### 5. Effective Dates:

Reliability Standard CIP-004-6 shall become effective on the later of April 1, 2016 or the first day of the first calendar quarter that is six calendar months after the date that the standard is approved by an applicable governmental authority, or as otherwise provided for in a jurisdiction where approval by an applicable governmental authority is required for a standard to go into effect. Where approval by an applicable governmental authority is not required, the standard shall become effective on the later of April 1, 2016 or first day of the first calendar quarter that is three months after the date the standard is adopted by the NERC Board of Trustees, or as otherwise provided for in that jurisdiction.

#### 6. Background:

Standard CIP-004 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.

Most requirements open with, "Each Responsible Entity shall implement one or more documented [processes, plan, etc] that include the applicable items in [Table Reference]." The referenced table requires the applicable items in the procedures for the requirement's common subject matter.

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 particular 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 in the table.

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 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.

June 2, 2014 Page 5 of 46

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 for the initial requirement are simply the documented processes themselves. Measures in the table rows provide examples of evidence to show documentation and implementation of applicable items in the documented processes. 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 Bulk Electric System. 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.

# "Applicable Systems" Columns in Tables:

Each table has an "Applicable Systems" column to further define the scope of systems to which a specific requirement row applies. The CSO706 SDT adapted this concept from the National Institute of Standards and Technology ("NIST") Risk Management Framework as a way of applying requirements more appropriately based on impact and connectivity characteristics. The following conventions are used in the "Applicable Systems" column as described.

- **High Impact BES Cyber Systems** Applies to BES Cyber Systems categorized as high impact according to the CIP-002-5.1 identification and categorization processes.
- **Medium Impact BES Cyber Systems** Applies to BES Cyber Systems categorized as medium impact according to the CIP-002-5.1 identification and categorization processes.
- Medium Impact BES Cyber Systems with External Routable Connectivity Only applies to medium impact BES Cyber Systems with External Routable Connectivity. This also excludes Cyber Assets in the BES Cyber System that cannot be directly accessed through External Routable Connectivity.
- Electronic Access Control or Monitoring Systems (EACMS) Applies to each Electronic Access Control or Monitoring System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System. Examples may include, but are not limited to, firewalls, authentication servers, and log monitoring and alerting systems.
- Physical Access Control Systems (PACS) Applies to each Physical Access Control System associated with a referenced high impact BES Cyber System or medium impact BES Cyber System with External Routable Connectivity.

June 2, 2014 Page 6 of 46

# **B.** Requirements and Measures

## **Rationale for Requirement R1:**

Ensures that Responsible Entities with personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Assets take action so that those personnel with such authorized electronic or authorized unescorted physical access maintain awareness of the Responsible Entity's security practices.

- **R1.** Each Responsible Entity shall implement one or more documented processes that collectively include each of the applicable requirement parts in CIP-004-6 Table R1 Security Awareness Program. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- **M1.** Evidence must include each of the applicable documented processes that collectively include each of the applicable requirement parts in *CIP-004-6Table R1 Security Awareness Program* and additional evidence to demonstrate implementation as described in the Measures column of the table.

	CIP-004-6 Table R1 – Security Awareness Program		
Part	Applicable Systems	Requirements	Measures
1.1	High Impact BES Cyber Systems  Medium Impact BES Cyber Systems	Security awareness that, at least once each calendar quarter, reinforces cyber security practices (which may include associated physical security practices) for the Responsible Entity's personnel who have authorized electronic or authorized unescorted physical access to BES Cyber Systems.	An example of evidence may include, but is not limited to, documentation that the quarterly reinforcement has been provided. Examples of evidence of reinforcement may include, but are not limited to, dated copies of information used to reinforce security awareness, as well as evidence of distribution, such as:  • direct communications (for example, e-mails, memos, computer-based training); or • indirect communications (for

June 2, 2014 Page 7 of 46

	CIP-004-6 Table R1 – Security Awareness Program		
Part	Applicable Systems	Requirements	Measures
			example, posters, intranet, or brochures); or  management support and reinforcement (for example, presentations or meetings).

#### **Rationale for Requirement R2:**

To ensure that the Responsible Entity's training program for personnel who need authorized electronic access and/or authorized unescorted physical access to BES Cyber Systems covers the proper policies, access controls, and procedures to protect BES Cyber Systems and are trained before access is authorized.

- **R2.** Each Responsible Entity shall implement one or more cyber security training program(s) appropriate to individual roles, functions, or responsibilities that collectively includes each of the applicable requirement parts in CIP-004-6 Table R2 Cyber Security Training Program. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
- **M2.** Evidence must include the training program that includes each of the applicable requirement parts in CIP-004-6 Table R2 Cyber Security Training Program and additional evidence to demonstrate implementation of the program(s).

June 2, 2014 Page 8 of 46

	CIP-004-6 Table R2 – Cyber Security Training Program		
Part	Applicable Systems	Requirements	Measures
2.1	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Training content on:  2.1.1. Cyber security policies; 2.1.2. Physical access controls; 2.1.3. Electronic access controls; 2.1.4. The visitor control program; 2.1.5. Handling of BES Cyber System Information and its storage; 2.1.6. Identification of a Cyber Security Incident and initial notifications in accordance with the entity's incident response plan; 2.1.7. Recovery plans for BES Cyber Systems; 2.1.8. Response to Cyber Security Incidents; and 2.1.9. Cyber security risks associated with a BES Cyber System's electronic interconnectivity and interoperability with other Cyber Assets, including Transient Cyber Assets, and with Removable Media.	Examples of evidence may include, but are not limited to, training material such as power point presentations, instructor notes, student notes, handouts, or other training materials.

June 2, 2014 Page 9 of 46

	CIP-004-6 Tal	ole R2 – Cyber Security Training Progran	n
Part	Applicable Systems	Requirements	Measures
2.2	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS	Require completion of the training specified in Part 2.1 prior to granting authorized electronic access and authorized unescorted physical access to applicable Cyber Assets, except during CIP Exceptional Circumstances.	Examples of evidence may include, but are not limited to, training records and documentation of when CIP Exceptional Circumstances were invoked.
	Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS		
2.3	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS	Require completion of the training specified in Part 2.1 at least once every 15 calendar months.	Examples of evidence may include, but are not limited to, dated individual training records.
	Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS		

June 2, 2014 Page 10 of 46

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

To ensure that individuals who need authorized electronic or authorized unescorted physical access to BES Cyber Systems have been assessed for risk. Whether initial access or maintaining access, those with access must have had a personnel risk assessment completed within the last 7 years.

- **R3.** Each Responsible Entity shall implement one or more documented personnel risk assessment program(s) to attain and retain authorized electronic or authorized unescorted physical access to BES Cyber Systems that collectively include each of the applicable requirement parts in CIP-004-6 Table R3 Personnel Risk Assessment Program. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].
- **M3.** Evidence must include the documented personnel risk assessment programs that collectively include each of the applicable requirement parts in *CIP-004-6 Table R3 Personnel Risk Assessment Program* and additional evidence to demonstrate implementation of the program(s).

	CIP-004-6 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures	
3.1	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS	Process to confirm identity.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity's process to confirm identity.	
	Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS			

June 2, 2014 Page 11 of 46

	CIP-004-6 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures	
3.2	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Process to perform a seven year criminal history records check as part of each personnel risk assessment that includes:  3.2.1. current residence, regardless of duration; and  3.2.2. other locations where, during the seven years immediately prior to the date of the criminal history records check, the subject has resided for six consecutive months or more.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity's process to perform a seven year criminal history records check.	
		If it is not possible to perform a full seven year criminal history records check, conduct as much of the seven year criminal history records check as possible and document the reason the full seven year criminal history records check could not be performed.		

June 2, 2014 Page 12 of 46

	CIP-004-6 Table R3 – Personnel Risk Assessment Program		
Part	Applicable Systems	Requirements	Measures
3.3	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS	Criteria or process to evaluate criminal history records checks for authorizing access.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity's process to evaluate criminal history records checks.
	Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS		
3.4	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:	Criteria or process for verifying that personnel risk assessments performed for contractors or service vendors are conducted according to Parts 3.1 through 3.3.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity's criteria or process for verifying contractors or service vendors personnel risk assessments.
	<ol> <li>EACMS; and</li> <li>PACS</li> </ol>		

June 2, 2014 Page 13 of 46

	CIP-004-6 Table R3 – Personnel Risk Assessment Program			
Part	Applicable Systems	Requirements	Measures	
3.5	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Process to ensure that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed according to Parts 3.1 to 3.4 within the last seven years.	An example of evidence may include, but is not limited to, documentation of the Responsible Entity's process for ensuring that individuals with authorized electronic or authorized unescorted physical access have had a personnel risk assessment completed within the last seven years.	

June 2, 2014 Page 14 of 46

# **Rationale for Requirement R4:**

To ensure that individuals with access to BES Cyber Systems and the physical and electronic locations where BES Cyber System Information is stored by the Responsible Entity have been properly authorized for such access. "Authorization" should be considered to be a grant of permission by a person or persons empowered by the Responsible Entity to perform such grants and included in the delegations referenced in CIP-003-6. "Provisioning" should be considered the actions to provide access to an individual.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (i.e., physical access control system, remote access system, directory services).

CIP Exceptional Circumstances are defined in a Responsible Entity's policy from CIP-003-6 and allow an exception to the requirement for authorization to BES Cyber Systems and BES Cyber System Information.

Quarterly reviews in Part 4.5 are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to access the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

If the results of quarterly or annual account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that the error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

**R4.** Each Responsible Entity shall implement one or more documented access management program(s) that collectively include each of the applicable requirement parts in CIP-004-6 Table R4 – Access Management Program. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning and Same Day Operations].

June 2, 2014 Page 15 of 46

**M4.** Evidence must include the documented processes that collectively include each of the applicable requirement parts in *CIP-004-6 Table R4 – Access Management Program* and additional evidence to demonstrate that the access management program was implemented as described in the Measures column of the table.

	CIP-004-6 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures	
4.1	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Process to authorize based on need, as determined by the Responsible Entity, except for CIP Exceptional Circumstances:  4.1.1. Electronic access;  4.1.2. Unescorted physical access into a Physical Security Perimeter; and  4.1.3. Access to designated storage locations, whether physical or electronic, for BES Cyber System Information.	An example of evidence may include, but is not limited to, dated documentation of the process to authorize electronic access, unescorted physical access in a Physical Security Perimeter, and access to designated storage locations, whether physical or electronic, for BES Cyber System Information.	

June 2, 2014 Page 16 of 46

	CIP-004-6 Table R4 – Access Management Program			
Part	Applicable Systems	Requirements	Measures	
4.2	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Verify at least once each calendar quarter that individuals with active electronic access or unescorted physical access have authorization records.	<ul> <li>Examples of evidence may include, but are not limited to:</li> <li>Dated documentation of the verification between the system generated list of individuals who have been authorized for access (i.e., workflow database) and a system generated list of personnel who have access (i.e., user account listing), or</li> <li>Dated documentation of the verification between a list of individuals who have been authorized for access (i.e., authorization forms) and a list of individuals provisioned for access (i.e., provisioning forms or shared account listing).</li> </ul>	

June 2, 2014 Page 17 of 46

	CIP-004-6	Table R4 – Access Management Program	
Part	Applicable Systems	Requirements	Measures
4.3	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	For electronic access, verify at least once every 15 calendar months that all user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and are those that the Responsible Entity determines are necessary.	An example of evidence may include, but is not limited to, documentation of the review that includes all of the following:  1. A dated listing of all accounts/account groups or roles within the system;  2. A summary description of privileges associated with each group or role;  3. Accounts assigned to the group or role; and  4. Dated evidence showing verification of the privileges for the group are authorized and appropriate to the work function performed by people assigned to each account.

June 2, 2014 Page 18 of 46

	CIP-004-6	Table R4 – Access Management Program	
Part	Applicable Systems	Requirements	Measures
4.4	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	Verify at least once every 15 calendar months that access to the designated storage locations for BES Cyber System Information, whether physical or electronic, are correct and are those that the Responsible Entity determines are necessary for performing assigned work functions.	An example of evidence may include, but is not limited to, the documentation of the review that includes all of the following:  1. A dated listing of authorizations for BES Cyber System information;  2. Any privileges associated with the authorizations; and  3. Dated evidence showing a verification of the authorizations and any privileges were confirmed correct and the minimum necessary for performing

June 2, 2014 Page 19 of 46

# **Rationale for Requirement R5:**

The timely revocation of electronic access to BES Cyber Systems is an essential element of an access management regime. When an individual no longer requires access to a BES Cyber System to perform his or her assigned functions, that access should be revoked. This is of particular importance in situations where a change of assignment or employment is involuntary, as there is a risk the individual(s) involved will react in a hostile or destructive manner.

In considering how to address directives in FERC Order No. 706 directing "immediate" revocation of access for involuntary separation, the SDT chose not to specify hourly time parameters in the requirement (e.g., revoking access within 1 hour). The point in time at which an organization terminates a person cannot generally be determined down to the hour. However, most organizations have formal termination processes, and the timeliest revocation of access occurs in concurrence with the initial processes of termination.

Access is physical, logical, and remote permissions granted to Cyber Assets composing the BES Cyber System or allowing access to the BES Cyber System. When granting, reviewing, or revoking access, the Responsible Entity must address the Cyber Asset specifically as well as the systems used to enable such access (e.g., physical access control system, remote access system, directory services).

- **R5.** Each Responsible Entity shall implement one or more documented access revocation program(s) that collectively include each of the applicable requirement parts in CIP-004-6 Table R5 Access Revocation. [Violation Risk Factor: Medium] [Time Horizon: Same Day Operations and Operations Planning].
- **M5.** Evidence must include each of the applicable documented programs that collectively include each of the applicable requirement parts in *CIP-004-6 Table R5 Access Revocation* and additional evidence to demonstrate implementation as described in the Measures column of the table.

June 2, 2014 Page 20 of 46

	CIP-004-6 Table R5 – Access Revocation							
Part	Applicable Systems	Requirements	Measures					
5.1	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	A process to initiate removal of an individual's ability for unescorted physical access and Interactive Remote Access upon a termination action, and complete the removals within 24 hours of the termination action (Removal of the ability for access may be different than deletion, disabling, revocation, or removal of all access rights).	An example of evidence may include, but is not limited to, documentation of all of the following:  1. Dated workflow or sign-off form verifying access removal associated with the termination action; and 2. Logs or other demonstration showing such persons no longer have access.					

June 2, 2014 Page 21 of 46

	CIP-004-6 Table R5 – Access Revocation								
Part	Applicable Systems	Requirements	Measures						
5.2	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	For reassignments or transfers, revoke the individual's authorized electronic access to individual accounts and authorized unescorted physical access that the Responsible Entity determines are not necessary by the end of the next calendar day following the date that the Responsible Entity determines that the individual no longer requires retention of that access.	An example of evidence may include, but is not limited to, documentation of all of the following:  1. Dated workflow or sign-off form showing a review of logical and physical access; and 2. Logs or other demonstration showing such persons no longer have access that the Responsible Entity determines is not necessary.						

June 2, 2014 Page 22 of 46

	CIP-004-6 Table R5 – Access Revocation								
Part	Applicable Systems	Requirements	Measures						
5.3	High Impact BES Cyber Systems and their associated:  1. EACMS; and 2. PACS  Medium Impact BES Cyber Systems with External Routable Connectivity and their associated:  1. EACMS; and 2. PACS	For termination actions, revoke the individual's access to the designated storage locations for BES Cyber System Information, whether physical or electronic (unless already revoked according to Requirement R5.1), by the end of the next calendar day following the effective date of the termination action.	An example of evidence may include, but is not limited to, workflow or sign-off form verifying access removal to designated physical areas or cyber systems containing BES Cyber System Information associated with the terminations and dated within the next calendar day of the termination action.						

June 2, 2014 Page 23 of 46

	CIP-004-6 Table R5 – Access Revocation								
Part	Applicable Systems	Requirements	Measures						
5.4	High Impact BES Cyber Systems and their associated:  • EACMS	For termination actions, revoke the individual's non-shared user accounts (unless already revoked according to Parts 5.1 or 5.3) within 30 calendar days of the effective date of the termination action.	An example of evidence may include, but is not limited to, workflow or signoff form showing access removal for any individual BES Cyber Assets and software applications as determined necessary to completing the revocation of access and dated within thirty calendar days of the termination actions.						

June 2, 2014 Page 24 of 46

	CI	P-0046 Table R5 – Access Revocation	
Part	Applicable Systems	Requirements	Measures
5.5	High Impact BES Cyber Systems and their associated:  • EACMS	For termination actions, change passwords for shared account(s) known to the user within 30 calendar days of the termination action. For reassignments or transfers, change passwords for shared account(s) known to the user within 30 calendar days following the date that the Responsible Entity determines that the individual no longer requires retention of that access.  If the Responsible Entity determines and documents that extenuating operating circumstances require a longer time period, change the password(s) within 10 calendar days following the end of the operating circumstances.	Examples of evidence may include, but are not limited to:  • Workflow or sign-off form showing password reset within 30 calendar days of the termination;  • Workflow or sign-off form showing password reset within 30 calendar days of the reassignments or transfers; or  • Documentation of the extenuating operating circumstance and workflow or sign-off form showing password reset within 10 calendar days following the end of the operating circumstance.

June 2, 2014 Page 25 of 46

# 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 Text** 

## 1.4. Additional Compliance Information:

None

June 2, 2014 Page 26 of 46

# 2. Table of Compliance Elements

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
R1	Operations Planning	Lower	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so less than 10 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so between 10 and 30 calendar days after the start of a subsequent calendar quarter. (1.1)	The Responsible Entity did not reinforce cyber security practices during a calendar quarter but did so within the subsequent quarter but beyond 30 calendar days after the start of that calendar quarter. (1.1)	The Responsible Entity did not document or implement any security awareness process(es) to reinforce cyber security practices. (R1) OR  The Responsible Entity did not reinforce cyber security practices and associated physical security practices for at least two consecutive calendar quarters. (1.1)
R2	Operations Planning	Lower	The Responsible Entity implemented a cyber security training program but failed to include one of the training	The Responsible Entity implemented a cyber security training program but failed to include two of the training content topics in Requirement Parts 2.1.1 through 2.1.9. (2.1)  OR	The Responsible Entity implemented a cyber security training program but failed to include three of the training content topics in Requirement Parts 2.1.1 through 2.1.9. (2.1)  OR	The Responsible Entity did not implement a cyber security training program appropriate to individual roles, functions, or responsibilities. (R2)  OR  The Responsible Entity

June 2, 2014 Page 27 of 46

R #	Time	VRF	Violation Severity Levels (CIP-004-6)			
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			content topics in Requirement Parts 2.1.1 through 2.1.9. (2.1)  OR  The Responsible Entity implemented a cyber security training program but failed to train one individual (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access. (2.2)	The Responsible Entity implemented a cyber security training program but failed to train two individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access. (2.2)  OR  The Responsible Entity implemented a cyber security training program but failed to train two individuals with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion date. (2.3)	The Responsible Entity implemented a cyber security training program but failed to train three individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access. (2.2)  OR  The Responsible Entity implemented a cyber security training program but failed to train three individuals with authorized electronic or authorized unescorted physical access within 15 calendar months of the previous training completion date. (2.3)	implemented a cyber security training program but failed to include four or more of the training content topics in Requirement Parts 2.1.1 through 2.1.9. (2.1)  OR  The Responsible Entity implemented a cyber security training program but failed to train four or more individuals (with the exception of CIP Exceptional Circumstances) prior to their being granted authorized electronic and authorized unescorted physical access. (2.2)  OR  The Responsible Entity implemented a cyber security training

June 2, 2014 Page 28 of 46

R #	Time	VRF		Violation Se	everity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			OR			program but failed to train four or more
			The			individuals with
			Responsible			authorized electronic or
			Entity			authorized unescorted
			implemented a			physical access within
			cyber security			15 calendar months of
			training program but			the previous training
			failed to train			completion date. (2.3)
			one individual			
			with authorized			
			electronic or			
			authorized			
			unescorted			
			physical access			
			within 15			
			calendar			
			months of the			
			previous training			
			completion			
			date. (2.3)			
R3	Operations	Medium	The	The Responsible Entity	The Responsible Entity	The Responsible Entity
	Planning		Responsible	has a program for	has a program for	did not have all of the
			Entity has a	conducting Personnel	conducting Personnel	required elements as
			program for	Risk Assessments (PRAs)	Risk Assessments (PRAs)	described by 3.1
			conducting	for individuals, including	for individuals, including	through 3.4 included

June 2, 2014 Page 29 of 46

R #	Time	VRF		Violation Se	everity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			Personnel Risk	contractors and service	contractors and service	within documented
			Assessments	vendors, but did not	vendors, but did not	program(s) for
			(PRAs) for	conduct the PRA as a	conduct the PRA as a	implementing Personnel
			individuals,	condition of granting	condition of granting	Risk Assessments
			including	authorized electronic or	authorized electronic or	(PRAs), for individuals,
			contractors and	authorized unescorted	authorized unescorted	including contractors
			service	physical access for two	physical access for three	and service vendors, for
			vendors, but	individuals. (R3)	individuals. (R3)	obtaining and retaining
			did not conduct	OR	OR	authorized cyber or
			the PRA as a			authorized unescorted
			condition of	The Responsible Entity	The Responsible Entity	physical access. (R3)
			granting	did conduct Personnel	did conduct Personnel	OR
			authorized	Risk Assessments (PRAs)	Risk Assessments (PRAs)	
			electronic or	for individuals, including	for individuals, including	The Responsible Entity
			authorized	contractors and service	contractors and service	has a program for
			unescorted	vendors, with	vendors, with	conducting Personnel
			physical access	authorized electronic or	authorized electronic or	Risk Assessments (PRAs)
			for one	authorized unescorted	authorized unescorted	for individuals, including
			individual. (R3)	physical access but did	physical access but did	contractors and service
			OR	not confirm identity for	not confirm identity for	vendors, but did not
				two individuals. (3.1 &	three individuals. (3.1 &	conduct the PRA as a
			The	3.4)	3.4)	condition of granting
			Responsible	OR	OR	authorized electronic or
			Entity did	The Desire weights Firstite.	The Decrease in the Futite	authorized unescorted
			conduct	The Responsible Entity	The Responsible Entity	physical access for four
			Personnel Risk	has a process to	has a process to	or more individuals. (R3)
			Assessments	perform seven-year	perform seven-year	OR
			(PRAs) for	criminal history record	criminal history record	
			individuals,	checks for individuals,	checks for individuals,	The Responsible Entity

June 2, 2014 Page 30 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			including	including contractors	including contractors	did conduct Personnel
			contractors and	and service vendors,	and service vendors,	Risk Assessments (PRAs)
			service	with authorized	with authorized	for individuals, including
			vendors, with	electronic or authorized	electronic or authorized	contractors and service
			authorized	unescorted physical	unescorted physical	vendors, with
			electronic or	access but did not	access but did not	authorized electronic or
			authorized	include the required	include the required	authorized unescorted
			unescorted	checks described in	checks described in	physical access but did
			physical access	3.2.1 and 3.2.2 for two	3.2.1 and 3.2.2 for three	not confirm identity for
			but did not	individuals. (3.2 & 3.4)	individuals. (3.2 & 3.4)	four or more
			confirm	OR	OR	individuals. (3.1 & 3.4)
			identity for one individual. (3.1	The Responsible Entity	The Responsible Entity	OR
			& 3.4)	did conduct Personnel	did conduct Personnel	The Responsible Entity
			,	Risk Assessments (PRAs)	Risk Assessments (PRAs)	has a process to
			OR	for individuals, including	for individuals, including	perform seven-year
			The	contractors and service	contractors and service	criminal history record
			Responsible	vendors, with	vendors, with	checks for individuals,
			Entity has a	authorized electronic or	authorized electronic or	including contractors
			process to	authorized unescorted	authorized unescorted	and service vendors,
			perform seven-	physical access but did	physical access but did	with authorized
			year criminal	not evaluate criminal	not evaluate criminal	electronic or authorized
			history record	history records check	history records check	unescorted physical
			checks for	for access authorization	for access authorization	access but did not
			individuals,	for two individuals. (3.3	for three individuals.	include the required
			including	& 3.4)	(3.3 & 3.4)	checks described in
			contractors and	OR	OR	3.2.1 and 3.2.2 for four
			service			or more individuals. (3.2
			vendors, with	The Responsible Entity	The Responsible Entity	& 3.4)

June 2, 2014 Page 31 of 46

R #	Time	VRF		Violation Se	everity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			authorized electronic or authorized unescorted physical access but did not include the required checks described in 3.2.1 and 3.2.2 for one individual. (3.2 & 3.4)	did not conduct Personnel Risk Assessments (PRAs) for two individuals with authorized electronic or authorized unescorted physical access within 7 calendar years of the previous PRA completion date. (3.5)	did not conduct Personnel Risk Assessments (PRAs) for three individuals with authorized electronic or authorized unescorted physical access within 7 calendar years of the previous PRA completion date. (3.5)	OR The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for four or more individuals. (3.3 & 3.4)
			The Responsible Entity did conduct Personnel Risk Assessments (PRAs) for individuals, including contractors and service vendors, with authorized			OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for four or more individuals with authorized electronic or authorized unescorted physical access within 7 calendar years of the previous PRA completion date.

June 2, 2014 Page 32 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			electronic or authorized unescorted physical access but did not evaluate criminal history records check for access authorization for one individual. (3.3 & 3.4)			(3.5)
			OR The Responsible Entity did not conduct Personnel Risk Assessments (PRAs) for one individual with authorized electronic or authorized unescorted physical access within 7			

June 2, 2014 Page 33 of 46

R #	Time	VRF	F Violation Severity Levels (CIP-004-6)			
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			calendar years of the previous PRA completion date. (3.5)			
R4	Operations Planning and Same Day Operations	Lower	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so less than 10 calendar days after the start of a subsequent calendar quarter. (4.2)	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between 10 and 20 calendar days after the start of a subsequent calendar quarter. (4.2)  OR  The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records during a calendar quarter but did so between 20 and 30 calendar days after the start of a subsequent calendar quarter. (4.2)  OR  The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct	The Responsible Entity did not implement any documented program(s) for access management. (R4)  OR  The Responsible Entity has implemented one or more documented program(s) for access management that includes a process to authorize electronic access, unescorted physical access, or access to the designated storage locations where BES Cyber System Information is located. (4.1)  OR

June 2, 2014 Page 34 of 46

R #	Time	VRF	Violation Severity Levels (CIP-004-6)			
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for one BES Cyber System, privileges were incorrect or unnecessary. (4.3)	and necessary within 15 calendar months of the previous verification but for two BES Cyber Systems, privileges were incorrect or unnecessary. (4.3)  OR  The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15 calendar months of the previous verification but for two BES Cyber System Information storage locations, privileges were incorrect or unnecessary. (4.4)	and necessary within 15 calendar months of the previous verification but for three BES Cyber Systems, privileges were incorrect or unnecessary. (4.3)  OR  The Responsible Entity has implemented processes to verify that access to the designated storage locations for BES Cyber System Information is correct and necessary within 15 calendar months of the previous verification but for three BES Cyber System Information storage locations, privileges were incorrect or unnecessary. (4.4)	The Responsible Entity did not verify that individuals with active electronic or active unescorted physical access have authorization records for at least two consecutive calendar quarters. (4.2)  OR  The Responsible Entity has implemented processes to verify that user accounts, user account groups, or user role categories, and their specific, associated privileges are correct and necessary within 15 calendar months of the previous verification but for four or more BES Cyber Systems, privileges were incorrect or unnecessary. (4.3)

June 2, 2014 Page 35 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			OR			
			The			OR
			Responsible			The Responsible Entity
			Entity has			has implemented
			implemented			processes to verify that
			processes to			access to the designated
			verify that			storage locations for
			access to the			BES Cyber System
			designated			Information is correct
			storage			and necessary within 15
			locations for			calendar months of the
			BES Cyber			previous verification but
			System			for four or more BES
			Information is			Cyber System
			correct and			Information storage
			necessary within 15			locations, privileges were incorrect or
			calendar			unnecessary. (4.4)
			months of the			unnecessary. (4.4)
			previous			
			verification but			
			for one BES			
			Cyber System			
			Information			
			storage			
			location,			
			privileges were			
			incorrect or			

June 2, 2014 Page 36 of 46

R #	Time	VRF	Violation Severity Levels (CIP-004-6)			
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			unnecessary.			
			(4.4)			
R5	Same Day Operations	Medium	The Responsible	The Responsible Entity has implemented one or	The Responsible Entity has implemented one or	The Responsible Entity has not implemented
	and Operations Planning		implemented one or more	more process(es) to remove the ability for unescorted physical	more process(es) to remove the ability for unescorted physical	any documented program(s) for access revocation for electronic
	Planning		process(es) to revoke the individual's access to the designated storage locations for BES Cyber System Information but, for one individual, did not do so by the end of the next calendar day following the effective date and time of the termination action. (5.3)	access and Interactive Remote Access upon a termination action or complete the removal within 24 hours of the termination action but did not initiate those removals for one individual. (5.1)  OR  The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for one	access and Interactive Remote Access upon a termination action or complete the removal within 24 hours of the termination action but did not initiate those removals for two individuals. (5.1)  OR  The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for two	access, unescorted physical access, or BES Cyber System Information storage locations. (R5)  OR  The Responsible Entity has implemented one or more process(es) to remove the ability for unescorted physical access and Interactive Remote Access upon a termination action or complete the removal within 24 hours of the termination action but did not initiate those removals for three or more individuals. (5.1)

June 2, 2014 Page 37 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			OR The Responsible Entity has implemented one or more process(es) to revoke the individual's user accounts upon termination action but did not do so for within 30 calendar days of the date of termination action for one or more individuals. (5.4) OR The Responsible Entity has implemented	individual, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar day following the predetermined date. (5.2)  OR  The Responsible Entity has implemented one or more process(es) to revoke the individual's access to the designated storage locations for BES Cyber System Information but, for two individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action. (5.3)	individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar day following the predetermined date. (5.2)  OR  The Responsible Entity has implemented one or more process(es) to revoke the individual's access to the designated storage locations for BES Cyber System Information but, for three or more individuals, did not do so by the end of the next calendar day following the effective date and time of the termination action. (5.3)	The Responsible Entity has implemented one or more process(es) to determine that an individual no longer requires retention of access following reassignments or transfers but, for three or more individuals, did not revoke the authorized electronic access to individual accounts and authorized unescorted physical access by the end of the next calendar day following the predetermined date. (5.2)

June 2, 2014 Page 38 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			one or more			
			process(es) to			
			change			
			passwords for			
			shared			
			accounts			
			known to the			
			user upon			
			termination			
			action,			
			reassignment,			
			or transfer, but			
			did not do so			
			for within 30			
			calendar days			
			of the date of			
			termination			
			action,			
			reassignment,			
			or transfer for			
			one or more			
			individuals.			
			(5.5)			
			OR			
			The			
			Responsible			
			Entity has			
			implemented			

June 2, 2014 Page 39 of 46

R #	Time	VRF		Violation Se	verity Levels (CIP-004-6)	
	Horizon		Lower VSL	Moderate VSL	High VSL	Severe VSL
			one or more			
			process(es) to			
			determine and			
			document			
			extenuating			
			operating			
			circumstances			
			following a			
			termination			
			action,			
			reassignment,			
			or transfer, but			
			did not change			
			one or more			
			passwords for			
			shared			
			accounts			
			known to the			
			user within 10			
			calendar days			
			following the			
			end of the			
			extenuating			
			operating			
			circumstances.			
			(5.5)			

June 2, 2014 Page 40 of 46

# D. Regional Variances

None.

# **E.** Interpretations

None.

# F. Associated Documents

None.

June 2, 2014 Page 41 of 46

#### **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. As specified in the exemption section 4.2.3.5, this standard does not apply to Responsible Entities that do not have High Impact or Medium Impact BES Cyber Systems under CIP-002-5's categorization. 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 security awareness program is intended to be an informational program, not a formal training program. It should reinforce security practices to ensure that personnel maintain awareness of best practices for both physical and electronic security to protect its BES Cyber Systems. The Responsible Entity is not required to provide records that show that each individual received or understood the information, but they must maintain documentation of the program materials utilized in the form of posters, memos, and/or presentations.

Examples of possible mechanisms and evidence, when dated, which can be used are:

- Direct communications (e.g., emails, memos, computer based training, etc.);
- Indirect communications (e.g., posters, intranet, brochures, etc.);
- Management support and reinforcement (e.g., presentations, meetings, etc.).

### **Requirement R2:**

Training shall cover the policies, access controls, and procedures as developed for the BES Cyber Systems and include, at a minimum, the required items appropriate to personnel roles and responsibilities from Table R2. The Responsible Entity has the flexibility to define the training program and it may consist of multiple modules and multiple delivery mechanisms, but

June 2, 2014 Page 42 of 46

a single training program for all individuals needing to be trained is acceptable. The training can focus on functions, roles or responsibilities at the discretion of the Responsible Entity.

One new element in the training content is intended to encompass networking hardware and software and other issues of electronic interconnectivity supporting the operation and control of BES Cyber Systems as per FERC Order No. 706, Paragraph 434. Additionally, training should address the risk posed when connecting and using Transient Cyber Assets and Removable Media with BES Cyber Systems or within an Electronic Security Perimeter. As noted in FERC Order No. 791, Paragraph 135, Transient Cyber Assets and Removable Media have been the source of incidents where malware was introduced into electric generation industrial control systems in real-world situations. Training on their use is a key element in protecting BES Cyber Systems. This is not intended to provide technical training to individuals supporting networking hardware and software, but educating system users of the cyber security risks associated with the interconnectedness of these systems. The users, based on their function, role, or responsibility, should have a basic understanding of which systems can be accessed from other systems and how the actions they take can affect cyber security.

Each Responsible Entity shall ensure all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, complete cyber security training prior to their being granted authorized access, except for CIP Exceptional Circumstances. To retain the authorized accesses, individuals must complete the training at least one every 15 months.

#### Requirement R3:

Each Responsible Entity shall ensure a personnel risk assessment is performed for all personnel who are granted authorized electronic access and/or authorized unescorted physical access to its BES Cyber Systems, including contractors and service vendors, prior to their being granted authorized access, except for program specified exceptional circumstances that are approved by the single senior management official or their delegate and impact the reliability of the BES or emergency response. Identity should be confirmed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. Identity only needs to be confirmed prior to initially granting access and only requires periodic confirmation according to the entity's process during the tenure of employment, which may or may not be the same as the initial verification action.

A seven year criminal history check should be performed for those locations where the individual has resided for at least six consecutive months. This check should also be performed in accordance with federal, state, provincial, and local laws, and subject to existing collective bargaining unit agreements. When it is not possible to perform a full seven year criminal history check, documentation must be made of what criminal history check was performed, and the reasons a full seven-year check could not be performed. Examples of this could include individuals under the age of 25 where a juvenile criminal history may be protected by law, individuals who may have resided in locations from where it is not possible to obtain a criminal history records check, violates the law or is not allowed under the existing collective bargaining agreement. The Responsible Entity should consider the absence of information for the full seven years when assessing the risk of granting access during the process to evaluate the

June 2, 2014 Page 43 of 46

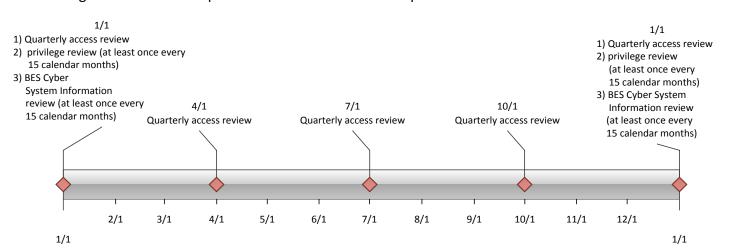
criminal history check. There needs to be a personnel risk assessment that has been completed within the last seven years for each individual with access. A new criminal history records check must be performed as part of the new PRA. Individuals who have been granted access under a previous version of these standards need a new PRA within seven years of the date of their last PRA. The clarifications around the seven year criminal history check in this version do not require a new PRA be performed by the implementation date.

#### Requirement R4:

Authorization for electronic and unescorted physical access and access to BES Cyber System Information must be on the basis of necessity in the individual performing a work function. Documentation showing the authorization should have some justification of the business need included. To ensure proper segregation of duties, access authorization and provisioning should not be performed by the same person where possible.

This requirement specifies both quarterly reviews and reviews at least once every 15 calendar months. Quarterly reviews are to perform a validation that only authorized users have been granted access to BES Cyber Systems. This is achieved by comparing individuals actually provisioned to a BES Cyber System against records of individuals authorized to the BES Cyber System. The focus of this requirement is on the integrity of provisioning access rather than individual accounts on all BES Cyber Assets. The list of provisioned individuals can be an automatically generated account listing. However, in a BES Cyber System with several account databases, the list of provisioned individuals may come from other records such as provisioning workflow or a user account database where provisioning typically initiates.

The privilege review at least once every 15 calendar months is more detailed to ensure an individual's associated privileges are the minimum necessary to perform their work function (i.e., least privilege). Entities can more efficiently perform this review by implementing role-based access. This involves determining the specific roles on the system (e.g., system operator, technician, report viewer, administrator, etc.) then grouping access privileges to the role and assigning users to the role. Role-based access does not assume any specific software and can be implemented by defining specific provisioning processes for each role where access group assignments cannot be performed. Role-based access permissions eliminate the need to



June 2, 2014 Page 44 of 46

perform the privilege review on individual accounts. An example timeline of all the reviews in Requirement R4 is included below.

Separation of duties should be considered when performing the reviews in Requirement R4. The person reviewing should be different than the person provisioning access.

If the results of quarterly or at least once every 15 calendar months account reviews indicate an administrative or clerical error in which access was not actually provisioned, then the SDT intends that this error should not be considered a violation of this requirement.

For BES Cyber Systems that do not have user accounts defined, the controls listed in Requirement R4 are not applicable. However, the Responsible Entity should document such configurations.

#### **Requirement R5:**

The requirement to revoke access at the time of the termination action includes procedures showing revocation of access concurrent with the termination action. This requirement recognizes that the timing of the termination action may vary depending on the circumstance. Some common scenarios and possible processes on when the termination action occurs are provided in the following table. These scenarios are not an exhaustive list of all scenarios, but are representative of several routine business practices.

Scenario	Possible Process
Immediate involuntary termination	Human resources or corporate security escorts the individual off site and the supervisor or human resources personnel notify the appropriate personnel to begin the revocation process.
Scheduled involuntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Voluntary termination	Human resources personnel are notified of the termination and work with appropriate personnel to schedule the revocation of access at the time of termination.
Retirement where the last working day is several weeks prior to the termination date	Human resources personnel coordinate with manager to determine the final date access is no longer needed and schedule the revocation of access on the determined day.
Death	Human resources personnel are notified of the death and work with appropriate personnel to begin the revocation process.

Revocation of electronic access should be understood to mean a process with the end result that electronic access to BES Cyber Systems is no longer possible using credentials assigned to

June 2, 2014 Page 45 of 46

or known by the individual(s) whose access privileges are being revoked. Steps taken to accomplish this outcome may include deletion or deactivation of accounts used by the individual(s), but no specific actions are prescribed. Entities should consider the ramifications of deleting an account may include incomplete event log entries due to an unrecognized account or system services using the account to log on.

The initial revocation required in Requirement R5.1 includes unescorted physical access and Interactive Remote Access. These two actions should prevent any further access by the individual after termination. If an individual still has local access accounts (i.e., accounts on the Cyber Asset itself) on BES Cyber Assets, then the Responsible Entity has 30 days to complete the revocation process for those accounts. However, nothing prevents a Responsible Entity from performing all of the access revocation at the time of termination.

For transferred or reassigned individuals, a review of access privileges should be performed. This review could entail a simple listing of all authorizations for an individual and working with the respective managers to determine which access will still be needed in the new position. For instances in which the individual still needs to retain access as part of a transitory period, the entity should schedule a time to review these access privileges or include the privileges in the quarterly account review or annual privilege review.

Revocation of access to shared accounts is called out separately to prevent the situation where passwords on substation and generation devices are constantly changed due to staff turnover.

Requirement 5.5 specified that passwords for shared account are to the changed within 30 calendar days of the termination action or when the Responsible Entity determines an individual no longer requires access to the account as a result of a reassignment or transfer. The 30 days applies under normal operating conditions. However, circumstances may occur where this is not possible. Some systems may require an outage or reboot of the system in order to complete the password change. In periods of extreme heat or cold, many Responsible Entities may prohibit system outages and reboots in order to maintain reliability of the BES. When these circumstances occur, the Responsible Entity must document these circumstances and prepare to change the password within 10 calendar days following the end of the operating circumstances. Records of activities must be retained to show that the Responsible Entity followed the plan they created.

June 2, 2014 Page 46 of 46