

Reliability Standard Audit Worksheet¹

CIP-011-3 – Cyber Security – Information Protection

This section to be completed by the Compliance Enforcement Authority.

Audit ID: Audit ID if available; or REG-NCRnnnnn-YYYYMMDD
Registered Entity: Registered name of entity being audited
NCR Number: NCRnnnnn
Compliance Enforcement Authority: Region or NERC performing audit
Compliance Assessment Date(s)²: Month DD, YYYY, to Month DD, YYYY
Compliance Monitoring Method: [On-site Audit | Off-site Audit | Spot Check]
Names of Auditors: Supplied by CEA

Applicability of Requirements

	BA	DP	GO	GOP	IA	LSE	PA	PSE	RC	RP	RSG	TO	TOP	TP	TSP
R1	X	X	X	X	X				X			X	X		
R2	X	X	X	X	X				X			X	X		

Legend:

Text with blue background:	Fixed text – do not edit
Text entry area with Green background:	Entity-supplied information
Text entry area with white background:	Auditor-supplied information

¹ NERC developed this Reliability Standard Audit Worksheet (RSAW) language in order to facilitate NERC’s and the Regional Entities’ assessment of a registered entity’s compliance with this Reliability Standard. The NERC RSAW language is written to specific versions of each NERC Reliability Standard. Entities using this RSAW should choose the version of the RSAW applicable to the Reliability Standard being assessed. While the information included in this RSAW provides some of the methodology that NERC has elected to use to assess compliance with the requirements of the Reliability Standard, this document should not be treated as a substitute for the Reliability Standard or viewed as additional Reliability Standard requirements. In all cases, the Regional Entity should rely on the language contained in the Reliability Standard itself, and not on the language contained in this RSAW, to determine compliance with the Reliability Standard. NERC’s Reliability Standards can be found on NERC’s website. Additionally, NERC Reliability Standards are updated frequently, and this RSAW may not necessarily be updated with the same frequency. Therefore, it is imperative that entities treat this RSAW as a reference document only, and not as a substitute or replacement for the Reliability Standard. It is the responsibility of the registered entity to verify its compliance with the latest approved version of the Reliability Standards, by the applicable governmental authority, relevant to its registration status.

The NERC RSAW language contained within this document provides a non-exclusive list, for informational purposes only, of examples of the types of evidence a registered entity may produce or may be asked to produce to demonstrate compliance with the Reliability Standard. A registered entity’s adherence to the examples contained within this RSAW does not necessarily constitute compliance with the applicable Reliability Standard, and NERC and the Regional Entity using this RSAW reserves the right to request additional evidence from the registered entity that is not included in this RSAW. Additionally, this RSAW includes excerpts from FERC Orders and other regulatory references. The FERC Order cites are provided for ease of reference only, and this document does not necessarily include all applicable Order provisions. In the event of a discrepancy between FERC Orders, and the language included in this document, FERC Orders shall prevail.

² Compliance Assessment Date(s): The date(s) the actual compliance assessment (on-site audit, off-site spot check, etc.) occurs.

DRAFT NERC Reliability Standard Audit Worksheet

Findings

(This section to be completed by the Compliance Enforcement Authority)

Req.	Finding	Summary and Documentation	Functions Monitored
R1			
P1.1			
P1.2			
R2			
P2.1			
P2.2			

Req.	Areas of Concern

Req.	Recommendations

Req.	Positive Observations

DRAFT NERC Reliability Standard Audit Worksheet

Subject Matter Experts

Identify the Subject Matter Expert(s) responsible for this Reliability Standard.

Registered Entity Response (Required; Insert additional rows if needed):

SME Name	Title	Organization	Requirement(s)

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DRAFT NERC Reliability Standard Audit Worksheet

R1 Supporting Evidence and Documentation

- R1.** Each Responsible Entity shall implement one or more documented information protection program(s) that collectively includes each of the applicable requirement parts in *CIP-011-3 Table R1 – Information Protection*. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].
- M1.** Evidence for the information protection program must include the applicable requirement parts in *CIP-011-3 Table R1 – Information Protection* and additional evidence to demonstrate implementation as described in the Measures column of the table.

R1 Part 1.1

CIP-011-3 Table R1 – Information Protection			
Part	Applicable Systems	Requirements	Measures
1.1	High Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; and 2. PACS Medium Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; and 2. PACS 	Method(s) to identify information that meets the definition of BES Cyber System Information.	Examples of acceptable evidence include, but are not limited to: <ul style="list-style-type: none"> • Documented method to identify BES Cyber System Information from entity’s information protection program; or • Indications on information (e.g., labels or classification) that identify BES Cyber System Information as designated in the entity’s information protection program; or • Training materials that provide personnel with sufficient knowledge to recognize BES Cyber System Information; or • Repository or electronic and physical location designated for housing BES Cyber System Information in the entity’s information protection program.

Registered Entity Response (Required):

Question: Is Part 1.1 applicable to this audit? Yes No

If “No,” why not?

This entity does not have any of the Applicable Systems.

Other: [Provide explanation below]

DRAFT NERC Reliability Standard Audit Worksheet

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to CIP-011-3, R1.1

This section to be completed by the Compliance Enforcement Authority

	Verify the information protection program(s) have method(s) to identify information that meets the definition of BES Cyber System Information.
	Verify the entity has implemented the method(s) to identify information that meets the definition of BES Cyber System Information.

Auditor Notes:

DRAFT NERC Reliability Standard Audit Worksheet

R1 Part 1.2

CIP-008-5 Table R1 – Cyber Security Incident Response Plan Specifications			
Part	Applicable Systems	Requirements	Measures
1.2	High Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; and 2. PACS Medium Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; and 2. PACS 	Procedure(s) for protecting and securely handling BES Cyber System Information, including storage, transit, and use.	Examples of acceptable evidence include, but are not limited to: <ul style="list-style-type: none"> • Procedures for protecting and securely handling, which include topics such as storage, security during transit, and use of BES Cyber System Information; or • Records indicating that BES Cyber System Information is handled in a manner consistent with the entity’s documented procedure(s).

Registered Entity Response (Required):

Question: Is R1.2 applicable to this audit? Yes No

If “No,” why not?

This entity does not have any of the Applicable Systems.

Other: [Provide explanation below]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

DRAFT NERC Reliability Standard Audit Worksheet

Compliance Assessment Approach Specific to CIP-011-3, R1.2

This section to be completed by the Compliance Enforcement Authority

	Verify the information protection program(s) have procedure(s) for protecting and securely handling BES Cyber System Information, including storage, transit, and use.
	Verify the entity has implemented the procedure(s) for protecting and securely handling BES Cyber System Information, including storage, transit, and use.

Auditor Notes:

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DRAFT NERC Reliability Standard Audit Worksheet

R2 Supporting Evidence and Documentation

- R2.** Each Responsible Entity shall implement one or more documented process(es) that collectively include the applicable requirement parts in *CIP-011-3 Table R2 – BES Cyber Asset Reuse and Disposal*. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning].
- M2.** Evidence must include each of the applicable documented processes that collectively include each of the applicable requirement parts in *CIP-011-3 Table R2 – BES Cyber Asset Reuse and Disposal* and additional evidence to demonstrate implementation as described in the Measures column of the table.

R2 Part 2.1

CIP-011-3 Table R2 – BES Cyber Asset Reuse and Disposal			
Part	Applicable Systems	Requirements	Measures
2.1	High Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; 2. PACS; and 3. PCA Medium Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; 2. PACS; and 3. PCA 	Prior to the release for reuse of applicable Cyber Assets that contain BES Cyber System Information (except for reuse within other systems identified in the “Applicable Systems” column), the Responsible Entity shall take action to prevent the unauthorized retrieval of BES Cyber System Information from the Cyber Asset data storage media.	Examples of acceptable evidence include, but are not limited to: <ul style="list-style-type: none"> • Records tracking sanitization actions taken to prevent unauthorized retrieval of BES Cyber System Information such as clearing, purging, or destroying; or • Records tracking actions such as encrypting, retaining in the Physical Security Perimeter or other methods used to prevent unauthorized retrieval of BES Cyber System Information.

Registered Entity Response (Required):

Question: Is Part 2.1 applicable to this audit? Yes No

If “No,” why not?

- This entity does not have any of the Applicable Systems.
 Other: [Provide explanation below]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted

DRAFT NERC Reliability Standard Audit Worksheet

should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

File Name	Document Title	Revision or Version	Document Date	Relevant Page(s) or Section(s)	Description of Applicability of Document

Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

Compliance Assessment Approach Specific to CIP-011-3, R2.1

This section to be completed by the Compliance Enforcement Authority

	Verify that the process(es) contain provision for preventing the unauthorized retrieval of BES Cyber System Information from Cyber Asset data storage media, prior to the release for reuse of Cyber Assets of Applicable Systems that contain BES Cyber System Information (except for reuse within other systems identified in the “Applicable Systems” column). .
	Verify that prior to the release for reuse of Cyber Assets of Applicable Systems that contain BES Cyber System Information (except for reuse within other systems identified in the “Applicable Systems” column), the Responsible Entity has taken action to prevent the unauthorized retrieval of BES Cyber System Information from the Cyber Asset data storage media.

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DRAFT NERC Reliability Standard Audit Worksheet

R2 Part 2.2

CIP-011-3 Table R2 – BES Cyber Asset Reuse and Disposal			
Part	Applicable Systems	Requirements	Measures
2.2	High Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; 2. PACS; and 3. PCA Medium Impact BES Cyber Systems and their associated: <ol style="list-style-type: none"> 1. EACMS; 2. PACS; and 3. PCA 	Prior to the disposal of applicable Cyber Assets that contain BES Cyber System Information, the Responsible Entity shall take action to prevent the unauthorized retrieval of BES Cyber System Information from the Cyber Asset or destroy the data storage media.	Examples of acceptable evidence include, but are not limited to: <ul style="list-style-type: none"> • Records that indicate that data storage media was destroyed prior to the disposal of an applicable Cyber Asset; or • Records of actions taken to prevent unauthorized retrieval of BES Cyber System Information prior to the disposal of an applicable Cyber Asset.

Registered Entity Response (Required):

Question: Is Part 2.1 applicable to this audit? Yes No

If “No,” why not?

This entity does not have any of the Applicable Systems.

Other: [Provide explanation below]

Registered Entity Response (Required):

Compliance Narrative:

Provide a brief explanation, in your own words, of how you comply with this Requirement. References to supplied evidence, including links to the appropriate page, are recommended.

Registered Entity Evidence (Required):

The following information is requested for each document submitted as evidence. Also, evidence submitted should be highlighted and bookmarked, as appropriate, to identify the exact location where evidence of compliance may be found.

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Audit Team Evidence Reviewed (This section to be completed by the Compliance Enforcement Authority):

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DRAFT NERC Reliability Standard Audit Worksheet

Compliance Assessment Approach Specific to CIP-011-3, R2.2

This section to be completed by the Compliance Enforcement Authority

	Verify that the process(es) contain provision for preventing the unauthorized retrieval of BES Cyber System Information from the Cyber Asset or destroyed the data storage media prior to the disposal of Cyber Assets of Applicable Systems that contain BES Cyber System Information.
	Verify that prior to the disposal of Cyber Assets of Applicable Systems that contain BES Cyber System Information, the Responsible Entity has taken action to prevent the unauthorized retrieval of BES Cyber System Information from the Cyber Asset or destroyed the data storage media.

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Additional Information:

Reliability Standard

The full text of CIP-011-3 may be found on the NERC Web Site (www.nerc.com) under “Program Areas & Departments”, “Reliability Standards.”

In addition to the Reliability Standard, there is an applicable Implementation Plan available on the NERC Web Site.

In addition to the Reliability Standard, there is background information available on the NERC Web Site.

Capitalized terms in the Reliability Standard refer to terms in the NERC Glossary, which may be found on the NERC Web Site.

Sampling Methodology

Sampling is essential for auditing compliance with NERC Reliability Standards since it is not always possible or practical to test 100% of either the equipment, documentation, or both, associated with the full suite of enforceable standards. The Sampling Methodology Guidelines and Criteria (see NERC website), or sample guidelines, provided by the Electric Reliability Organization help to establish a minimum sample set for monitoring and enforcement uses in audits of NERC Reliability Standards.

Regulatory Language

See FERC Order 706

See FERC Order 791

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Revision History for RSAW

Version	Date	Reviewers	Revision Description
DRAFT1v0	06/17/2014	Posted for Industry Comment	New Document
DRAFT2v0	09/17/2014	CIP RSAW Development Team	Address comments received in response to DRAFT1v0.
DRAFT3v0	12/10/2014	CIP RSAW Development Team	Address comments received in response to DRAFT2v0.

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