NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Reliability Standard Audit Worksheet[1]

CIP-011-4 – 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	PA/PC	RC	RP	RSG	TO	TOP	TP	TSP
R1	X	*	X	X		X			X	X		
R2	X	*	X	X		X			X	X		

* CIP-011-3 is only applicable to DPs that own certain UFLS, UVLS, RAS, Protection Systems, or Cranking Paths. See CIP-011-3 Section 4, Applicability, for details.

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.

Findings

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

Req.	Finding	Summary and Documentation	Functions Monitored
R1			
R2			

Req.	Areas of Concern

Req.	Recommendations

Req.	Positive Observations

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)

R1 Supporting Evidence and Documentation

R1. Each Responsible Entity shall implement one or more documented information protection program(s) for BCSI pertaining to Applicable Systems identified in *CIP-01104 Table R1 – Information Protection Program* that collectively includes each of the applicable requirement parts in *CIP-011-4 Table R1 – Information Protection Program. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].*

M1. Evidence for the information protection program must include the applicable requirement parts in *CIP-011-4 Table R1 – Information Protection Program* and additional evidence to demonstrate implementation as described in the Measures column of the table.

R1 Part 1.1

CIP-011-4 Table R1 – Information Protection Program			
Part	**Applicable Systems**	**Requirements**	**Measures**
1.1	High impact BCS and their associated: 1. Electronic Access Control and Monitoring Systems (EACMS); and 2. Physical Access Control Systems (PACS) Medium impact BCS and their associated: 1. EACMS; and 2. PACS Shared Cyber Infrastructure (SCI) supporting an Applicable System in this Part	Method(s) to identify BCSI.	Examples of evidence may include, but are not limited to, the following: • Documented method(s) to identify BCSI from the entity's information protection program; or • Indications on information (e.g., labels or classification) that identify BCSI as designated in the entity's information protection program; or • Training materials that provide personnel with sufficient knowledge to recognize BCSI; or • Storage locations identified for housing BCSI in the entity's information protection program.

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-011-4, R1, Part 1.1

This section to be completed by the Compliance Enforcement Authority

	Verify the Responsible Entity has documented one or more information protection programs that have method(s) to identify BCSI.
	Verify the Responsible Entity has implemented the method(s) to identify BCSI.

Auditor Notes:

R1 Part 1.2

CIP-011-4 Table R1 – Information Protection Program			
Part	**Applicable Systems**	**Requirements**	**Measures**
1.2	High impact BCS and their associated: 1. EACMS; and 2. PACS Medium impact BCS and their associated: 1. EACMS; and 2. PACS SCI supporting an Applicable System in this Part	Method(s) to protect and securely handle BCSI to mitigate risks of compromising confidentiality.	Examples of evidence for on-premise BCSI may include, but are not limited to, the following: • Procedures for protecting and securely handling, which include topics such as storage, security during transit, and use of BCSI; or • Records indicating that BCSI is handled in a manner consistent with the entity's documented procedure(s). Examples of evidence for off-premise BCSI may include, but are not limited to, the following: • Implementation of electronic technical method(s) to protect electronic BCSI (e.g., data masking, encryption, hashing, tokenization, cipher, electronic key management); or • Implementation of physical technical method(s) to protect physical BCSI (e.g., physical lock and key management, physical badge management, biometrics, alarm system); or • Implementation of administrative method(s) to protect BCSI (e.g., vendor service risk assessments, business agreements).

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-011-4, R1, Part 1.2

This section to be completed by the Compliance Enforcement Authority

	Verify the Responsible Entity has documented one or more information protection programs that include method(s) for protecting and securely handling BCSI to mitigate risks of compromising confidentiality.
	Verify the Responsible Entity has implemented the methods(s) for protecting and securely handling BCSI to mitigate risks of compromising confidentiality, including storage, transit, and use.

Notes to Auditor:

Authorization of access to BCSI that pertains to BCS, EACMS, and PACS at the medium-without-ERC impact rating should be addressed in the information protection program.

CIP-004-7 R6 applies to provisioned access to BCSI. Other forms of access, if any, should be addressed by the information protection program.

Auditor Notes:

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-011-4 Table R2 – 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-011-4 Table R2 – Reuse and Disposal* and additional evidence to demonstrate implementation as described in the Measures column of the table.

R2 Part 2.1

CIP-011-4 Table R2 –Reuse and Disposal			
Part	**Applicable Systems**	**Requirements**	**Measures**
2.1	High impact BCS and their associated: 1. EACMS; 2. PACS; and 3. PCA Medium impact BCS and their associated: 1. EACMS; 2. PACS; and 3. PCA SCI supporting an Applicable System in this Part	Methods to prevent the unauthorized retrieval of BCSI from Applicable Systems containing BCSI, prior to their disposal or reuse (except for reuse within other systems identified in the Applicable Systems column).	Examples of evidence may include, but are not limited to, the following: • Records tracking sanitization actions taken to prevent unauthorized retrieval of BCSI such as clearing, purging, or destroying; or • Records tracking actions such as encrypting, retaining in the Physical Security Perimeter (PSP) or other methods used to prevent unauthorized retrieval of BCSI.

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-011-4, R2, Part 2.1
This section to be completed by the Compliance Enforcement Authority

	Verify the Responsible Entity has documented one or more processes that have methods to take action to prevent the unauthorized retrieval of BCSI from Applicable Systems containing BCSI, prior to their disposal or reuse (except for reuse within other systems identified in the Applicable Systems column).
	Verify the Responsible Entity has implemented the method(s) to prevent the unauthorized retrieval of BCSI from Applicable Systems containing BCSI, prior to their disposal or reuse (except for reuse within other systems identified in the Applicable Systems column).

Auditor Notes:

Additional Information:

Reliability Standard

The full text of CIP-011-4 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 822

Revision History for RSAW

Version	Date	Reviewers	Revision Description
DRAFTv1	02/28/2024		Initial Draft