## **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 (March 20, 2008).
- 2. SC authorized moving the SAR forward to standard development (July 10, 2008).
- 3. First posting for 60-day formal comment period and concurrent ballot (November 2011).
- 4. Second posting for 40-day formal comment period and concurrent ballot (April 2012).

## **Description of Current Draft**

This is the <u>secondthird</u> posting of Version 5 of the CIP Cyber Security Standards for a 40<u>30</u>-day formal comment period. An initial concept paper, Categorizing Cyber Systems — An Approach Based on BES Reliability Functions, was posted for public comment in July 2009. An early draft consolidating CIP-002 – CIP-009, numbered CIP-010-1 and CIP-011-1, was posted for public informal comment in May 2010. A first posting of Version 5, which reverted to the original organization of the standards with some changes, was posted in November 2011 for a 60-day comment period and first-ballot.– A second posting of Version 5 reverts to the original organization of the standards with some changes and was posted in April 2012 for a 40-day comment period and ballot. Version 5 addresses the balance of the FERC directives in its Order No. 706 approving Version 1 of the standards. This posting for formal comment and parallel successive ballot addresses the comments received from the first-second posting and ballot.

| Anticipated Actions  | Anticipated Date               |
|--|--------------------------------|
| 4030-day Formal Comment Period with Parallel Successive Ballot | April <u>September</u><br>2012 |
| Recirculation ballot   | June <u>November</u><br>2012   |
| BOT adoption   | JuneDecember 2012              |

# **Effective Dates**

- 24 Months Minimum The Version 5-CIP Cyber Security Standards, except for CIP-003-5, Requirement R2,-004-5 shall become effective on the later of July 1, 2015, or the first calendar day of the ninth calendar quarter after the effective date of the order providing applicable regulatory approval. CIP-003-5, Requirement R2 shall become effective on the later of July 1, 2016, or the first calendar day of the 13th calendar quarter after the effective date of the order providing applicable regulatory approval. Notwithstanding any order to the contrary, CIP-002-4 through CIP-009-4 do not become effective, and CIP-002-3 through CIP-009-3 remain in effect and are not retired until the effective date of the Version 5 CIP Cyber Security Standards under this implementation plan.<sup>1</sup>
- 2. In those jurisdictions where no regulatory approval is required, the Version-<u>CIP-004-5</u> <u>CIP Cyber Security Standards, except for CIP 003-5, Requirement R2</u>, shall become effective on the first day of the ninth calendar quarter following Board of Trustees' approval, and CIP-003-5, Requirement R2 shall become effective on the first day of the 13th calendar quarter following Board of Trustees approval, or as otherwise made effective pursuant to the laws applicable to such ERO governmental authorities.

<sup>&</sup>lt;sup>4</sup> In jurisdictions where CIP-002-4 through CIP-009-4 have not yet become effective according to their implementation plan (even if approved by order), this implementation plan and the Version 5 CIP Cyber Security Standards supersede and replace the implementation plan and standards for CIP-002-4 through CIP-009-4.

# Version History

| Version | Date     | Action   | Change Tracking |
|---------|----------|--|-----------------|
| 1       | 1/16/06  | R3.2 — Change "Control Center" to<br>"control center."   | 3/24/06         |
| 2       | 9/30/09  | Modifications to clarify the<br>requirements and to bring the<br>compliance elements into conformance<br>with the latest guidelines for developing<br>compliance elements of standards.<br>Removal of reasonable business<br>judgment.<br>Replaced the RRO with the RE as a<br>responsible entity.<br>Rewording of Effective Date.<br>Changed compliance monitor to<br>Compliance Enforcement Authority. |                 |
| 3       | 12/16/09 | Updated version number from -2 to -3<br>Approved by the NERC Board of<br>Trustees.   |                 |
| 3       | 3/31/10  | Approved by FERC.  |                 |
| 4       | 12/30/10 | Modified to add specific criteria for Critical Asset identification.   | Update          |
| 4       | 1/24/11  | Approved by the NERC Board of Trustees.  | Update          |
| 5       | TBD      | Modified to coordinate with other CIP standards and to revise format to use RBS Template.  |                 |

# **Definitions of Terms Used in the Standard**

See the associated "Definitions of Terms Used in Version 5 CIP Cyber Security Standards," which consolidates and includes all newly defined or revised terms used in the proposed Version 5 CIP Cyber Security Standards.

When this standard has received ballot approval, the text boxes will be moved to the "Guidelines and Technical Basis" section of the Standard.

# A.Introduction

- 1. Title: Cyber Security Personnel & Training
- **2. Number:** CIP-004-5
- **3. Purpose:** To minimize the risk <u>against compromise that could lead to misoperation</u> <u>or instability in the BES</u> 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 against compromise that could lead to misoperation or instability in the BES.

## 4. Applicability:

- 4.1. Functional Entities: \_\_\_\_\_\_\_For the purpose of the requirements contained herein, the following list of Functional Entities functional entities will be collectively referred to as "Responsible Entities." For requirements in this standard where a specific Functional Entity functional entity or subset of Functional Entities functional entities are the applicable entity or entities, the Functional Entity functional entity or Entities are specified explicitly.
  - 4.1.1. Balancing Authority
    - 4.1.2. Distribution Provider that owns Facilities described in 4.2.2
    - 4.1.3. Generator Operator
    - 4.1.4. Generator Owner
    - 4.1.5. Interchange Coordinator
    - 4.1.6. Load Serving Entity that owns Facilities described in 4.2.1
    - 4.1.7. Reliability Coordinator
    - 4.1.8. Transmission Operator
    - 4.1.9. Transmission Owner
    - 4.2. Facilities:
      - **4.2.1.** Load Serving Entity: One<u>one</u> or more of the UFLS or UVLS Systems that are part of a Load shedding program required by a NERC or Regional Reliability Standard<u>following Facilities, systems</u>, and that perform automatic load shedding under a common control system, without human operator initiation, of 300 MW or more.
  - **4.2.2<u>4.1.2.</u>** Distribution Provider: One or more of the Systems or programs designed, installed, and operatedequipment for the protection or restoration of the BES:
    - **4.1.2.1.** A-Each underfrequency Load shedding (UFLS) or undervoltage Load shedding (UVLS-System) system that-:

- 4.1.2.1.1. is part of a Load shedding program required by that is subject to one or more requirements in a NERC or Regional Reliability Standard; and that
- •4.1.2.1.2. performs automatic Load shedding under a common control system <u>owned by the Responsible Entity</u>, without human operator initiation, of 300 MW or more.
- •4.1.2.2. <u>AEach</u> Special Protection System or Remedial Action Scheme where the Special Protection System or Remedial Action Scheme is required by<u>subject</u> to one or more requirements in a NERC or Regional Reliability Standard.
- •4.1.2.3. <u>AEach</u> Protection System <u>(excluding UFLS and UVLS)</u> that applies to Transmission where the Protection System is required by subject to one or <u>more requirements in</u> a NERC or Regional Reliability Standard.
- •4.1.2.4. Each Cranking Path and group of Elements meeting the initial switching requirements from a Blackstart Resource up to and including the first interconnection point of the starting station service of the next generation unit(s) to be started.

## 4.1.3. Generator Operator

- 4.1.4. Generator Owner
- 4.1.5. Interchange Coordinator or Interchange Authority
- 4.1.6. Reliability Coordinator
- 4.1.7. Transmission Operator
- 4.1.8. Transmission Owner
- **4.2. Facilities:** For the purpose of the requirements contained herein, the following Facilities, systems, and equipment owned by each Responsible Entity in 4.1 above are those to which these requirements are applicable. For requirements in this standard where a specific type of Facilities, system, or equipment or subset of Facilities, systems, and equipment are applicable, these are specified explicitly.
  - **4.2.1.** Distribution Provider: One or more of the following Facilities, systems and equipment owned by the Distribution Provider for the protection or restoration of the BES:
    - 4.2.1.1. Each UFLS or UVLS System that:
      - **4.2.1.1.1.** is part of a Load shedding program that is subject to one or more requirements in a NERC or Regional Reliability Standard; and
      - **4.2.1.1.2.** performs automatic Load shedding under a common control system owned by the Responsible Entity, without human operator initiation, of 300 MW or more.

- **4.2.1.2.** Each 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.

## 4.2.3<u>4.2.2.</u> Responsible Entities listed in 4.1 other than Distribution Providers-and Load-Serving Entities: All BES Facilities.

All BES Facilities.

- 4.2.44.2.3. Exemptions: The following are exempt from Standard CIP-002004-5:
  - **4.2.4.1<u>4.2.3.1.</u>** Cyber Assets at Facilities regulated by the Canadian Nuclear Safety Commission.
  - **4.2.4.2<u>4.2.3.2</u>** Cyber Assets associated with communication networks and data communication links between discrete Electronic Security Perimeters.
  - **4.2.4.3**<u>4.2.3.3.</u><u>In nuclear plants, the Systems</u><u>The systems</u>, structures, and components that are regulated by the Nuclear Regulatory Commission under a cyber security plan pursuant to 10 C.F.R. Section 73.54.
  - **4.2.3.4.** For Distribution Providers, the systems and equipment that are not included in section 4.2.1 above.
  - **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 identification and categorization processes.

## 5. Background:

Standard CIP-004-5 exists as part of a suite of CIP Standards related to cyber security. CIP-002-5 requires the initial identification and categorization of BES Cyber Systems. CIP-003-5, CIP-004-5, CIP-005-5, CIP-006-5, CIP-007-5, CIP-008-5, CIP-009-5, CIP-010-1 and CIP-011-1 require a minimum level of organizational, operational and procedural controls to mitigate risk to BES Cyber Systems. This suite of CIP Standards is referred to as the *Version 5 CIP Cyber Security Standards*.

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 athe requirement's common subject matter.

The SDT has incorporated within this standard a recognition that certain requirements should not focus on individual instances of failure as a sole basis for violating the standard. In particular, the SDT has incorporated an approach to empower and enable the industry to identify, assess, and correct deficiencies in the implementation of certain requirements. The intent is to change the basis of a violation in those requirements so that they are not focused on *whether* there is a deficiency, but on identifying, assessing, and correcting deficiencies. It is presented in those requirements by modifying "implement" as follows:

Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, . . .

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. A numbered list in the measure means the evidence example includes all of the items in the list. In contrast, a bulleted list provides multiple options of acceptable evidence. These measures serve to provide guidance to entities in acceptable records of compliance and should not be viewed as an all inclusive list.

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 <u>they feelit believes</u> necessary in their documented processes, but they must address the applicable requirements in the table. <u>The documented processes themselves are not required to include the "...</u> identifies, assesses, and corrects deficiencies, ..." elements described in the preceding paragraph, as those aspects are related to the manner of implementation of the documented processes and could be accomplished through other controls or compliance management activities.

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.

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.

<u>Measures for the initial requirement are simply the documented processes</u> <u>themselves. Measures in the table rows provide examples of evidence to show</u> <u>documentation and implementation of applicable items in the documented processes.</u> <u>These measures serve to provide guidance to entities in acceptable records of</u> <u>compliance and should not be viewed as an all-inclusive list.</u>

#### **Applicability Columns in Tables:**

Each table row 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 applicability "Applicable Systems" column to further define the scope of systems to which a specific requirement row applies to BES Cyber Systems and associated Cyber Assets. 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 applicability "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 identification and categorization processes.
- Medium Impact BES Cyber Systems Applies to BES Cyber Systems categorized as medium impact according to the CIP-002-5 identification and categorization processes.
- Medium Impact BES Cyber Systems with External Routable Connectivity or dial-up connectivity -- Only applies to medium impact BES Cyber Systems with External Routable Connectivity or dial-up connectivity.
- Associated Electronic Access Control or Monitoring Systems (EACMS) Applies to each Electronic Access Control or Monitoring System associated with a correspondingreferenced high impact BES Cyber System or medium impact BES Cyber

System in the applicability column. Examples include, but are not limited to, firewalls, authentication servers, and log monitoring and alerting systems.

 Associated Physical Access Control Systems (PACS) – Applies to each Physical Access Control System associated with a correspondingreferenced high impact BES Cyber System or medium impact BES Cyber System with External Routable Connectivity in the applicability column.

#### **B**-Requirements and Measures

**Rationale for 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.

Summary of Changes: Reformatted into table structure.

- **R1.** Each Responsible Entity shall implement one or more documented processes that collectively include each of the applicable itemsrequirement parts in CIP-004-5 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 <u>itemsrequirement parts</u> in *CIP-004-5 Table R1 – Security Awareness Program* and additional evidence to demonstrate implementation as described in the Measures column of the table.

| CIP-004   | CIP-004-5 Table R1 – Security Awareness Program  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| Part Applicable BES Cyber Systems and<br>associated Cyber Assets                | Requirements   | Measures   |  |  |  |  |
| 1.1       High Impact BES Cyber Systems         Medium Impact BES Cyber Systems | A securitySecurity awareness program<br>that, at least once each calendar<br>quarter, conveys ongoing<br>reinforcement ofreinforces cyber<br>security practices and associated<br>physical security practices for the<br>Responsible Entity's personnel who<br>have authorized electronic or<br>authorized unescorted physical access<br>to BES Cyber Systems. | <ul> <li>Evidence must include the documented security awareness program, and additional <u>An example of</u> evidence to demonstrate that this program was implemented. Evidence of implementation-may include, but <u>is</u> not limited to, documentation that the quarterly reinforcement has been provided. Evidence 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:         <ul> <li></li></ul></li></ul> |  |  |  |  |
| Reference to prior version:<br>CIP-004-4, R1                                    | Change Rationale: Changed to remove t<br>authorized electronic or authorized unes<br>ongoing reinforcement – to state that <del>th</del><br>and measures that reinforcement "has b<br>Moved example mechanisms to guidance   | <del>e program conveys<u>s</u>ecurity</del> awareness<br>een <del>provided."<u>reinforced.</u></del>   |  |  |  |  |
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| CIP-004-5 Table R1 – Security Awareness Program |   |                             |          |  |  |  |
|---|---|-----------------------------|----------|--|--|--|
| Part  | Applicable <del>BES-Cyber</del> Systems <del>-and</del><br><del>associated Cyber Assets</del> | Requirements                | Measures |  |  |  |
|   |   | Changed to record delivery. |          |  |  |  |

**Rationale for 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.

Based on their role, some personnel may not require training on all topics.

#### Summary of Changes:

1. Addition of specific role training for:

- The visitor control program
- Electronic interconnectivity supporting the operation and control of BES Cyber Systems
- Storage media as part of the handling of BES Cyber Systems information

2. Change references from Critical Cyber Assets to BES Cyber Systems.

- R2. Each Responsible Entity shall have implement, in a role-based manner that identifies, assesses, and corrects deficiencies, a cyber security training program(s) appropriate to attain and retain authorized electronic access individual roles, functions, or authorized unescorted physical access to BES Cyber Systems that responsibilities that collectively includes each of the applicable itemsrequirement parts in CIP-004-5 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 <u>itemsrequirement parts</u> in CIP-004-5 Table R2 Cyber Security Training Program, and additional evidence to demonstrate implementation of the program(s).

| CIP-004-5 Table R2 – Cyber Security Training Program |   |  |  |
|--|---|--|--|
| Part   | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets   | Requirements   | Measures   |
| 2.1  | High Impact BES<br>Cyber Systems<br>Medium Impact<br>BES Cyber Systems<br>with External<br>Routable<br>Connectivity or<br>dial-up<br>connectivity<br>Associated Physical<br>Access Control<br>Systems<br>Associated<br>Electronic Access<br>Control or<br>Monitoring<br>Systems | Identification of each<br>role and training<br>required for each role. | Acceptable evidence must include a list of roles and what<br>training is needed for each role.   |
| Reference to prior version: NEW                      |   |  | first thing needed in a role-based training program is to<br>individuals have so that the Responsible Entity can plan what<br>ds to provide. |

| <del>2.2<u>Part</u></del>                       | connectivity<br>Associated Physical A<br>Associated Electro |                          | Training content on the<br>cyber security policies<br>protecting the Responsible<br>Entity's BES Cyber<br>Systems.Requirements | Evidence may include, but is<br>not limited to, training<br>material on the security<br>controls that have been<br>implemented to protect BES<br>Cyber Systems.Measures |
|---|---|--------------------------|--|---|
| Reference to prior version:<br>CIP004-4, R2.2.1 |   | function. The previous v | noved to address cyber security<br>ersion was focused more on th<br>and is outside the scope of cybe                           | ne business or functional use of  |

|                    | CIP-004-5 Table R2 – Cyber Security Training Program              |  |   |   |  |  |
|--------------------|---|--|---|---|--|--|
| Part               | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets | <b>Requirements</b>                                    | Me  | <del>easures</del>  |  |  |
| 2. <u>31</u>       | <u>1. Associated El</u>   | Cyber Systems with<br>nnectivity <del>or dial-up</del> | Training content on the<br>physical:2.1.1. Cyber security<br>policies;2.1.2. Physical access<br>controls-protecting<br>the Responsible<br>Entity's;2.1.3. Electronic access<br>controls;2.1.4. The visitor control<br>program;2.1.5. Handling of BES<br>Cyber System<br>Information and its<br>storage;2.1.6. Identification of a<br>Cyber Security<br>Incident and initial<br> | EvidenceExamples of evidence<br>may include, but isare not<br>limited to, training material<br>such as power point<br>presentations, instructor<br>notes, student notes,<br>handouts, or other training<br>materials-on the proper use of<br>physical access controls for<br>BES Cyber Systems. |  |  |
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|                    |   |  | 2.1.9. Cyber security risks<br>associated with a<br>BES Cyber System's  |   |  |  |

|  | CIP-004-5 Table R2 – Cyber Security Training Program  |  |                         |                     |  |  |
|--|---|--|-------------------------|---------------------|--|--|
|  | PartApplicable BES<br>Cyber Systems and<br>associated Cyber<br>AssetsReference to prior version:<br>CIP004-4, R2.2.1 and R2.2.2 |  | <del>Requirements</del> | Measures            |  |  |
|  |   |  | Change Rationale: Min   | or wording changes. |  |  |

|   | CIP-00  | 4-5 Table R2 – Cyber Se  | curity Training Program  |
|---|---|--|--|
| Part  | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets   | Requirements   | Measures   |
| Reference to prior<br>version:<br><i>CIP004-4, R2.</i> 2.4 <u>1</u> | High Impact BES<br>Cyber SystemsMedium Impact<br>BES Cyber Systems<br>with External<br>Routable<br>Connectivity or<br>dial-up<br>connectivityAssociated Physical<br>Access Control<br>SystemsAssociated<br>Electronic Access<br>Control or<br>Monitoring<br>Systems | Training content on<br>the electronic access<br>controls protecting<br>the Responsible<br>Entity's BES Cyber<br>Systems. | Change Rationale: Removed "proper use of Critical Cyber<br>Assets" concept from previous versions to focus the<br>requirement on cyber security issues, not the business<br>function. The previous version was focused more on the<br>business or functional use of the BES Cyber System and is<br>outside the scope of cyber security. Personnel who will<br>administer the visitor control process or serve as escorts for<br>visitors need training on the program. Core training on the<br>handling of BES Cyber System (not Critical Cyber Assets)<br>Information, with the addition of storage; FERC Order No.<br>706, paragraph 413 and paragraphs 632-634, 688, 732-734;<br>DHS 2.4.16. Core training on the identification and<br>reporting of a Cyber Security Incident; FERC Order No. 706,<br>Paragraph 413; Related to CIP-008-5 & DHS Incident<br>Reporting requirements for those with roles in incident<br>reporting. Core training on the action plans and procedures<br>to recover or re-establish BES Cyber Systems for personnel<br>having a role in the recovery; FERC Order No. 706,<br>Paragraph 413. Core training programs are intended to<br>encompass networking hardware and software and other<br>issues of electronic interconnectivity supporting the<br>operation and control of BES Cyber Systems; FERC Order No.<br>706, Paragraph 434. Evidence may include, but is not<br>limited to, training material such as power point<br>presentations, instructor notes, student notes, handouts, or<br>other training materials on the electronic access controls to<br>protect BES Cyber Systems. |

|                     | CIP-00  | 4-5 Table R2 – Cyber S                                 | ecurity Training Program  |
|---------------------|---|--|---|
| Part                | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets   | Requirements   | Measures  |
| Reference to prior  | version:  | Change Rationale: -M                                   | nor wording changes.  |
| CIP004 4, R2.2.1 ar | <del>nd R2.2.2</del>  |  |   |
| 2.5                 | High Impact BES<br>Cyber SystemsMedium Impact<br>BES Cyber Systems<br>with External<br>Routable<br>Connectivity or<br>dial-up<br>connectivityAssociated Physical<br>Access Control<br>SystemsAssociated<br> | Training content on<br>the visitor control<br>program. | Evidence may include, but is not limited to, training material<br>such as power point presentations, instructor notes,<br>student notes, handouts, or other training materials on the<br>visitor control program. |
| Reference to prior  | version:  | Change Rationale: No                                   | significant change from previous versions.  |
| NEW                 |   |  |   |

|  | CIP-00  | 94-5 Table R2 – Cyber Se   | curity Training Program  |
|--|---|--|--|
| Part   | A <del>pplicable BES</del><br>Cyber Systems and<br>associated Cyber<br>Assets   | Requirements   | Measures   |
| 2.6  | High Impact BES<br>Cyber Systems<br>Medium Impact<br>BES Cyber Systems<br>with External<br>Routable<br>Connectivity or<br>dial-up<br>connectivity<br>Associated Physical<br>Access Control<br>Systems<br>Associated<br>Electronic Access<br>Control or<br>Monitoring<br>Systems | Training content on<br>handling of BES Cyber<br>System Information<br>and its storage. | Evidence may include, but is not limited to, training material<br>such as power point presentations, instructor notes,<br>student notes, handouts, or other training materials on the<br>handling of BES Cyber System Information, including its<br>storage. |
| Reference to prior version:<br><i>CIP004-4, R2.2.3</i> |   | <del>Cyber Assets) Informati</del>   | e training on the handling of BES Cyber System (not Critical<br>on, with the addition of storage media; FERC Order No. 706,<br>agraphs 632-634, 688, 732-734; DHS 2.4.16.  |

|   | CIP-004-5 Table R2 – Cyber Security Training Program              |  |  |  |  |  |
|---|---|--|--|--|--|--|
| Part  | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets | Requirements   | Me   | <del>asures</del>  |  |  |
| 2. <del>72</del>  | <u>1. Associated Ele</u>  | Cyber Systems with<br>nnectivity <del>or dial-up</del> | Training content onidentification of a potentialBES Cyber Security Incidentand initial notifications inaccordance with theentity's incident responseplanRequire completion of thetraining specified in Part2.1 prior to grantingauthorized electronicaccess and authorizedunescorted physical accessto applicable Cyber Assets,except during CIPExceptional Circumstances. | EvidenceExamples of evidence<br>may include, but isare not<br>limited to, training material<br>such as power point<br>presentations, instructor<br>notes, student notes,<br>handouts, or other training<br>materials on the identification<br>of a potential BES Cyber<br>Security Incidentrecords and<br>associated<br>notificationsdocumentation of<br>when CIP Exceptional<br>Circumstances were invoked. |  |  |
| Reference to prior v<br><u>CIP-004-4, R2.2.4 (ne</u><br><del>008-4)<u>CIP004-4, R2.</u></del> | ew; implied but not stated  | <del>l in CIP-004-4 or CIP-</del>                      | reporting <u>Addition</u> of <del>a Cyber</del><br><u>circumstances parameters a</u><br>706, Paragraph <del>413; Related</del>   | L <u>to431 is detailed in</u> CIP-<br>porting requirements for those   |  |  |

| CIP-004-5 Table R2 – Cyber Security Training Program          |   |   |   |   |
|---|---|---|---|---|
| Part  | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets | Requirements  | Me  | <del>asures</del>   |
| 2. <u>83</u>  | <u>1. Associated Ele</u>  | Cyber Systems with<br>nnectivity <del>or dial-up</del>                | Training content on<br>recovery plans for BES<br>Cyber Systems.Require<br>completion of the training<br>specified in Part 2.1 at least<br>once every 15 calendar<br>months. | EvidenceExamples of evidence<br>may include, but isare not<br>limited to, dated individual<br>training material such as<br>power point presentations,<br>instructor notes, student<br>notes, handouts, or other<br>training materials on recovery<br>plans for BES Cyber<br>Systemsrecords. |
| Reference to prior version:<br>CIP004-4, R2. <del>2.4</del> 3 |   | <u>"annually" with "once every</u><br>training on the action plans of | and procedures to recover or re-<br>for personnel having a role in  |   |

|                      | CIP-00  | 94-5 Table R2 – Cyber Se  | curity Training Program  |
|----------------------|---|---|--|
| Part                 | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets   | Requirements  | Measures   |
| 2.9                  | High Impact BES<br>Cyber Systems<br>Medium Impact<br>BES Cyber Systems<br>with External<br>Routable<br>Connectivity or<br>dial-up<br>connectivity<br>Associated Physical<br>Access Control<br>Systems<br>Associated<br>Electronic Access<br>Control or<br>Monitoring<br>Systems | Training content on<br>response to BES Cyber<br>Security Incidents. | Evidence may include, but is not limited to, training material such as power point presentations, instructor notes, student notes, handouts, or other training materials on the response to a BES Cyber Security Incident. |
| Reference to prior v | version:  | Change Rationale: Minor wording changes.                            |  |
|                      |   |   |  |

| CIP-004-5 Table R2 – Cyber Security Training Program |  |   | curity Training Program  |  |
|--|--|---|--|--|
| Part   | Applicable BES<br>Cyber Systems and<br>associated Cyber<br>Assets  | Requirements  | Measures   |  |
| 2.10   | High Impact BES<br>Cyber SystemsMedium Impact<br>BES Cyber Systemswith External<br>Routable<br>Connectivity or<br>dial-up<br>connectivityAssociated Physical<br>Access Control<br>SystemsAssociated<br>Electronic Access<br> | Training content on<br>risks associated with a<br>BES Cyber System's<br>electronic<br>interconnectivity and<br>interoperability with<br>other Cyber Assets. | Evidence may include, but is not limited to, training material such as power point presentations, instructor notes, student notes, handouts, or other training materials on the electronic interconnectivity and interoperability with other Cyber Assets. |  |
| Reference to prior ve                                | ersion:  | Change Rationale: Core training programs are intended to encompass networking   |  |  |
|  |  |   | and other issues of electronic interconnectivity supporting rol of BES Cyber Systems; FERC Order No. 706, Paragraph 434.   |  |

Rationale for R3: To ensure that personnel with authorized electronic access or authorized unescorted physical access are trained in the policies, access controls, and procedures to protect the BES Cyber Systems.

**Summary of Changes:** Re organization of the training requirements into the respective requirements for "program" and "implementation" of the training.

- **R3.** Each Responsible Entity shall implement its documented role-based cyber security training program to attain and retain authorized electronic or unescorted physical access to BES Cyber Systems that includes each of the applicable items in *CIP-*004 5 Table R3 Cyber Security Training. [Violation Risk Factor: Medium] [Time Horizon: Same Day Operations].
- **M3.** Evidence must include, but is not limited to, documentation that the training was provided as defined in *CIP 004 5 Table R3 Cyber Security Training*.

|                | CIP-004-5 Table R3 – Cyber Security Training  |   |  |  |  |
|----------------|---|---|--|--|--|
| Part           | Applicable BES Cyber Systems and<br>associated Cyber Assets   | Requirements  | Measures   |  |  |
| <del>3.1</del> | High Impact BES Cyber Systems<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems  | Require completion and<br>documentation of the training specified<br>in CIP-004-5, Requirement R2 prior to<br>granting authorized electronic access<br>and authorized unescorted physical<br>access to BES Cyber Systems, except<br>during CIP Exceptional Circumstances. | Evidence may include, but is not<br>limited to, for each individual requiring<br>authorized electronic or authorized<br>unescorted physical access, dated<br>individual training records, the date<br>authorized electronic or authorized<br>unescorted physical access was first<br>granted, or a dated log or<br>documentation of when CIP<br>Exceptional Circumstances were<br>invoked and revoked. |  |  |
|                | Reference to prior version:Change Rationale: Addition of exceptional circumstances parameters as direct<br>in FERC Order No. 706, Paragraph 431 is detailed in CIP-003-5.CIP004-4, R2.1in FERC Order No. 706, Paragraph 431 is detailed in CIP-003-5. |   | -  |  |  |

|                               | CIP-004-5 Table R3 – Cyber Security Training   |  |   |  |  |
|-------------------------------|--|--|---|--|--|
| Part                          | Applicable BES Cyber Systems and<br>associated Cyber Assets  | Requirements   | Measures  |  |  |
| <del>3.2</del>                | High Impact BES Cyber SystemsMedium Impact BES Cyber Systemswith External Routable Connectivity or<br>dial-up connectivityAssociated Physical Access Control<br>SystemsAssociated Electronic Access Control or<br>Monitoring Systems | Require completion and<br>documentation of the training specified<br>in CIP 004 5, Requirement R2 at least<br>once every calendar year, but not to<br>exceed 15 calendar months. | Evidence may include, but is not<br>limited to, dated individual training<br>records. |  |  |
| Reference to prior version: C |  | Change Rationale: Updated to further de  | efine what "Annual" training means.   |  |  |
| CIP00                         | 4-4, R2.3  |  |   |  |  |

Rationale for R4: To ensure that individuals who need authorized electronic or unescorted physical access to BES Cyber Systems have been assessed for risk.

**Summary of Changes:** Specify that the seven year criminal history check covers all locations where the individual has resided, been employed, and/or attended school for six months or more, including current residence regardless of duration.

**R4.** Each Responsible Entity shall have

**Rationale for 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.

**Summary of Changes:** Specify that the seven year criminal history check covers all locations where the individual has resided for six consecutive months or more, including current residence regardless of duration.

- **R3.** Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented personnel risk assessment programs to attain and retain authorized electronic or authorized unescorted physical access to BES Cyber Systems that collectively includes include each of the applicable itemsrequirement parts in CIP-004-5 Table R4R3 Personnel Risk Assessment Program. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].
- M4<u>M3</u>. Evidence must include the documented personnel risk assessment programs that collectively includes includes each of the applicable items requirement parts in CIP-004-5 Table <u>R4R3</u> Personnel Risk Assessment Program- and additional evidence to demonstrate implementation of the program(s).

|   | CIP-004-5 Table R4R3 – Personnel Risk Assessment Program   |  |  |  |  |
|---|--|--|--|--|--|
| Part  | Applicable <del>BES Cyber S</del> ystems <del>and</del><br><del>associated Cyber Assets</del>  | Requirements   | Measures   |  |  |
| 4 <u>3</u> .1                                 | High Impact BES Cyber Systems and their<br>associated:<br><u>1. EACMS; and</u><br><u>2. PACS</u><br>Medium Impact BES Cyber Systems with<br>External Routable Connectivity or dial-up<br>connectivityand their associated:<br>Associated Physical Access Control<br>Systems<br><u>1. Associated Electronic Access</u><br><u>Control or Monitoring Systems</u><br><u>EACMS; and</u><br><u>2. PACS</u> | An initial personnel risk assessment<br>("PRA") that includesProcess to confirm<br>identity verification.  | Acceptable <u>An example of</u> evidence<br><u>mustmay</u> include <u>, but is not limited</u><br><u>to, documentation of</u> the<br><u>documented personnel risk</u><br>assessment program with a<br>requirement for an initial personnel<br>risk assessment that<br>includes <u>Responsible Entity's process</u><br><u>to confirm</u> identity-verification. |  |  |
| Reference to prior version:<br>CIP004-4, R3.1 |  | <b>Change Rationale:</b> Addressed interpreta<br>that identity verification <u>confirmation</u> is or<br>assessment. The implementation plan clar<br>verification conducted under an earlier ver | ly required for each individual's initial ifies that a documented identity   |  |  |

| CIP-004-5 Table R4 <u>R3</u> – Personnel Risk Assessment Program |  |  |   |
|--|--|--|---|
| Part   | Applicable <del>BES Cyber </del> Systems <del>and</del><br><del>associated Cyber Assets</del>  | Requirements   | Measures  |
| 4 <u>3</u> .2  | High Impact BES Cyber Systems and<br>their associated:<br>1. EACMS; and<br>2. PACS<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity and their<br>associated:<br>Associated Physical Access Control<br>Systems<br>1. Associated Electronic Access<br>Control or Monitoring Systems<br>EACMS; and<br>2. PACS | <ul> <li>Seven-Process to perform a seven year criminal history records check includingas part of each personnel risk assessment that includes:</li> <li>3.2.1. current residence, regardless of duration; and covering at least all</li> <li>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:.</li> <li>4.2.1. resided;</li> <li>4.2.2. been employed (if applicable); and</li> <li>4.2.3. attended school (if applicable).</li> <li>If it is not possible to perform a full seven year criminal history records check as possible and document the reason the full seven year criminal history records check as possible and document the reason the full seven year criminal history records check as possible and be performed.</li> </ul> | AcceptableAn example of evidence<br>mustmay include, but is not limited to,<br>documentation of the documented<br>personnel risk assessment program<br>with a requirement for Responsible<br>Entity's process to perform a seven-<br>year criminal history recordrecords<br>check-in accordance with this part. |

| school for six months or more, including current residence regardless of duration | <b>Reference to prior version:</b><br><i>CIP004-4, R3.1</i> | <b>Change Rationale:</b> Specify that the seven year criminal history check covers all locations where the individual has resided, been employed, and/or attended school for six months or more, including current residence regardless of duration. Added additional wording based on interpretation request. Provision is made for when a full seven-year check cannot be performed. |
|---|---|--|
|---|---|--|

|               | CIP-004-5 Table R4R3 – Personnel Risk Assessment Program   |   |   |  |  |
|---------------|--|---|---|--|--|
| Part          | Applicable <del>BES Cyber</del> Systems <del>and</del><br><del>associated Cyber Assets</del>   | Requirements  | Measures  |  |  |
| 4 <u>3</u> .3 | High Impact BES Cyber Systems and their<br>associated:1. EACMS; and<br>2. PACS2. PACSMedium Impact BES Cyber Systems with<br>External Routable Connectivity or dial-up<br> | Process <del>or criteria used to evaluate personnel risk assessments to determine when to deny authorized criminal history records checks for authorizing access.</del> | AcceptableAn example of<br>evidence mustmay include, but is<br>not limited to, documentation of<br>the documented personnel risk<br>assessment program with<br>theResponsible Entity's process or<br>criteria identifiedto evaluate<br>criminal history records checks. |  |  |
| NEW evo       |  | Change Rationale: There should be documer evaluate personnel risk assessments criminal authorizing access.  | -   |  |  |

| 43.4       High Impact BES Cyber Systems and their associated:         1.       EACMS; and         2.       PACS         Medium Impact BES Cyber Systems with External Routable Connectivity or dial-up connectivity and their associated:         Associated Physical Access Control Systems         1.       Associated Electronic Access Control Systems         1.       Associated Electronic Access Control Systems         2.       PACS | Criteria or process for verifying that<br>personnel risk assessments performed for<br>contractors or service vendors are<br>conducted <del>pursuantaccording</del> to <del>CIP-004-5</del><br><del>R4,</del> Parts 4 <u>3</u> .1 through 4 <u>3</u> .3. | AcceptableAn example of<br>evidence mustmay include, but is<br>not limited to, documentation of<br>the documented personnel risk<br>assessment program with<br>theResponsible Entity's criteria or<br>process identifiedfor verifying<br>contractors or service vendors<br>personnel risk assessments. |
|---|---|--|
| Reference to prior version:   | Change Rationale: Separated into its own t  | able item.   |
| CIP-004-4, R3.3   |   |  |
| <u>CIP-004-5 Tabl</u>   | <u>le R3 – Personnel Risk Assessment Program</u>  |  |
| Part Applicable Systems   | <u>Requirements</u>   | <u>Measures</u>  |

| 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<br>authorized electronic or authorized<br>unescorted physical access have had a<br>personnel risk assessment completed<br>according to Parts 3.1 to 3.4 within the last<br>seven years.  | An example of evidence may<br>include, but is not limited to,<br>documentation of the<br>Responsible Entity's process for<br>ensuring that individuals with<br>authorized electronic or<br>authorized unescorted physical<br>access have had a personnel risk<br>assessment completed within the<br>last seven years. |
|---|--|---|
| Reference to prior version:<br><u>CIP-004-3, R3, R3.3</u>   | <b>Change Rationale</b> : Whether for initial access<br>establishes that those with access must have<br>This covers both initial and renewal. The imp<br>initial performance of this requirement is 7 y<br>assessment that was performed pursuant to<br>Security Standards for a personnel risk assess | e had PRA completed within 7 years.<br>Dementation plan specifies that<br>ears after the last personnel risk<br>a previous version of the CIP Cyber   |

Rationale for R5: To ensure that individuals who have authorized access to BES Cyber Systems have been assessed for risk.

<del>R5.</del>

**Rationale for 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-003-5. "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).

<u>CIP Exceptional Circumstances are defined in a Responsible Entity's policy from CIP-003-5 and allow an exception to the</u> 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.

Summary of Changes: The primary change was in pulling the access management requirements from CIP-003-4, CIP-004-4, and CIP-007-4 into a single requirement. The requirements from Version 4 remain largely unchanged except to clarify some terminology. The purpose for combining these requirements is to remove the perceived redundancy in authorization and review. The requirement in CIP-004-4 R4 to maintain a list of authorized personnel has been removed because the list represents only one form of evidence to demonstrate compliance that only authorized persons have access.

- **R4.** Each Responsible Entity shall implement-one or more documented processes to attain and retain authorized electronic or authorized unescorted physical access to BES Cyber Systems, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access management programs that collectively include each of the applicable requirement parts in *CIP-004-5 Table R4 Access Management Program.* [Violation Risk Factor: Lower] [Time Horizon: Operations Planning and Same Day Operations].
- collectively include each of the applicable elements in CIP 004 5 Table R5 Personnel Risk Assessment. [Violation Risk Factor: Medium] [Time Horizon: Same Day Operations]
- -M5. Evidence must include each of the applicable documented processes that collectively include each of the applicable items in CIP 004-5 Table R5 – Personnel Risk Assessment and additional evidence to demonstrate that these processes were implemented as described in the Measures column of the table.

| 1 High Impact BES Cyber Systems   | Have a personnel risk assessment   |   |
|---|--|---|
| Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems | performed as specified in CIP-004-5,<br>Requirement R4 prior to being granted<br>authorized electronic or authorized<br>unescorted physical access, except for<br>CIP Exceptional Circumstances. | <ul> <li>Evidence may include, but is not limited<br/>to:</li> <li>Dated records showing that<br/>personnel risk assessments were<br/>completed before authorized<br/>electronic or authorized unescorted<br/>physical access was authorized; or</li> <li>Dated records showing that, before<br/>authorized electronic or authorized<br/>unescorted access was authorized,<br/>the Responsible Entity received<br/>dated documentation or<br/>attestations from contractors or<br/>service vendors verifying that<br/>personnel risk assessments were<br/>conducted pursuant to CIP 004 5,<br/>Requirement R4.</li> </ul> |

|                | CIP-004-5 Table R5 – Personnel Risk Assessment   |   |  |
|----------------|--|---|--|
| Part           | Applicable BES Cyber Systems and<br>associated Cyber Assets  | Requirement   | Measures   |
| <del>5.2</del> | High Impact BES Cyber Systems<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems | Update each personnel risk assessment<br>at least once every seven calendar<br>years after the initial or previous<br>personnel risk assessment such that<br>the current PRA is no older than seven<br>years. | Evidence may include, but is not<br>limited to, current and previous<br>personnel risk assessment records. |
| Refer          | ence to prior version:   | Change Rationale: - Eliminated the "for c   | ause" renewal.   |
| CIP OC         | <del>94 4, R3.2</del>  |   |  |

**Rationale for R6:** 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 003-5. "Provisioning" should be considered the actions to provide access to an individual.

Access is physical, logical, and remote permissions granted to all 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 003-5 and allow an exception to the requirement for authorization to BES Cyber Systems and BES Cyber System Information.

Quarterly reviews in Part 6.5 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 R6 are not applicable. However, the Responsible Entity should document such configurations.

Summary of Changes: The primary change was in pulling the access management requirements from CIP 003 4, CIP 004 4, and CIP 007 4 into a single requirement. The requirements from Version 4 remain largely unchanged except to clarify some terminology. The purpose for combining these requirements is to remove the perceived redundancy in authorization and review. The requirement in CIP 004 4 R4 to maintain a list of authorized personnel has been removed because the list represents only one form of evidence to demonstrate compliance that only authorized persons have access.

- **R6.** Each Responsible Entity shall implement one or more documented access management programs that collectively include each of the applicable elements in *CIP 004 5 Table R6 Access Management Program. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning and Same Day Operations].*
- M6M4. Evidence must include the documented processes that collectively include each of the applicable itemsrequirement parts in CIP-004-5 Table R6R4 Access Management Program and additional evidence to demonstrate that the access management program was implemented as described in the Measures column of the table.

| Reference to prior version:           CIP 003-4, R5.1; CIP-007-4, R5.1.1           CIP-004 |  | Change Rationale: Combined requirement<br>006-4 to make the authorization process<br>5 Table R6 – Access Management Progra  | clear and consistent.  |
|--|--|---|--|
| Part   | <b>Applicability</b>   | Requirements  | Measures   |
| <del>6.2</del>   | High Impact BES Cyber Systems<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems | The individual(s) designated in Part 6.1<br>shall authorize electronic access that<br>the Responsible Entity determines is<br>necessary for performing assigned<br>work functions, except for CIP<br>Exceptional Circumstances. | Evidence may include, but is not<br>limited to, a signed document,<br>automated workflow approval, or<br>email showing persons with electronic<br>access have authorization, and similar<br>or the same records showing the<br>consideration of appropriate privileges<br>on the basis of need in performing a<br>work function were considered as part<br>of the authorization. |

| CIP-004-5 Table <mark>R&amp;R4</mark> – Access Management Program |      |                                 |              |          |
|---|------|---------------------------------|--------------|----------|
|   | Part | ApplicabilityApplicable Systems | Requirements | Measures |

|   | CIP-004-5 Table R4 – Access Management Program   |  |   |
|---|--|--|---|
| Part  | Applicable Systems   | Requirements   | Measures  |
| 4.1   | <ul> <li>High Impact BES Cyber Systems and their associated: <ol> <li>EACMS; and</li> <li>PACS</li> </ol> </li> <li>Medium Impact BES Cyber Systems with External Routable Connectivity and their associated: <ol> <li>EACMS; and</li> <li>PACS</li> </ol> </li> </ul> | <ul> <li>Process to authorize based on need, as determined by the Responsible Entity, except for CIP Exceptional Circumstances:</li> <li>4.1.1. Electronic access;</li> <li>4.1.2. Unescorted physical access into a Physical Security Perimeter; and</li> <li>4.1.3. Access to designated storage locations, whether physical or electronic, for BES Cyber System Information.</li> </ul> | An example of evidence may<br>include, but is not limited to, dated<br>documentation of the process to<br>authorize electronic access,<br>unescorted physical access in a<br>Physical Security Perimeter, and<br>access to designated storage<br>locations, whether physical or<br>electronic, for BES Cyber System<br>Information. |
| <b>Reference to prior version:</b><br><i>CIP 003-4, R5.1 and R5.2; CIP-006-4, R1.5 and</i><br><i>R4; CIP-007-4, R5.1 and R5.1.1</i> |  | <b>Change Rationale:</b> Combined requirements<br>006-4 to make the authorization process cle<br>004-4, CIP-006-4, and CIP-007-4 all reference<br>form, and CIP-003-4 and CIP-007-4 require of<br>basis or with respect to work functions perfe  | ear and consistent. <i>CIP-003-4, CIP-</i><br>te authorization of access in some<br>authorization on a "need to know"   |

ensure consistency in the requirement language.

| <ul> <li>6-34 High Impact BES Cyber Systems and their associated;</li> <li>2 associated;</li> <li>1. EACMS; and</li> <li>2. PACS</li> <li>Wedium Impact BES Cyber Systems with External Routable Connectivity or dial-up connectivity and their associated;</li> <li>Associated Physical Access Control Systems</li> <li>Associated Electronic Access Control Systems</li> <li>1. EACMS; and</li> <li>2. PACS</li> <li>Verify at least once each calendar quarter that individuals with active systems with unescorted physical access, have authorization records.</li> <li>Verify at least once each calendar guarter that individuals with active systems access have authorization records.</li> <li>Associated Electronic Access Control Systems</li> <li>1. EACMS; and</li> <li>2. PACS</li> </ul> |   |  |   |
|--|---|--|---|
|  | <br>associated:<br><u>1. EACMS; and</u><br><u>2. PACS</u><br>Medium Impact BES Cyber Systems with<br>External Routable Connectivity or dial-up<br>connectivityand their associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems<br><u>1. EACMS; and</u> | shall authorize unescorted physicalaccess that the Responsible Entitydetermines is necessary for performingassigned work functions, except for CIPExceptional Circumstances.Verify at least once each calendarquarter that individuals with activeelectronic access or unescorted physical | <ul> <li>include, but is<u>are</u> not limited to;</li> <li><u>Dated documentation of the</u><br/>verification between the system<br/>generated list of individuals who<br/>have been authorized for access<br/>(i.e., workflow database) and a<br/>system generated list of people<br/>with unescorted physical access,<br/>a signed document, automated<br/>workflow approval, or email<br/>showing persons with<br/>unescorted physicalpersonnel<br/>who have access have (i.e., user<br/>account listing), or</li> <li>Dated documentation of the<br/>verification between a list of<br/>individuals who have been<br/>authorized for access (i.e.,<br/>authorization, and similar<br/>forms) and a list of individuals<br/>provisioned for access (i.e.,<br/>provisioning forms or the same<br/>records showing the<br/>consideration of appropriate<br/>privileges on the basis of need<br/>in performing a work function<br/>were considered as part of the</li> </ul> |
|  |   |  | authorization. <u>shared account</u><br>listing).   |

| Reference to prior version:<br>CIP 004-4, R4.1 |      |                      | <b>Change Rationale:</b> Feedback among team members, observers, and regional CIP auditors indicates there has been confusion in implementation around what the term "review" entailed in CIP-004-4, Requirement R4.1. This requirement clarifies the review should occur between the provisioned access and authorized access. |          |
|--|------|----------------------|---|----------|
| CIP-004-5 Table R6 – Access Management Program |      | <del>m</del>         |   |          |
|  | Part | <b>Applicability</b> | Requirements  | Measures |

| <del>6.4</del>                                 | High Impact BES Cyber Systems<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems | The individual(s) designated in Part 6.1<br>shall authorize access to the physical<br>and electronic locations where BES<br>Cyber System Information is stored by<br>the Responsible Entity that the<br>Responsible Entity determines are<br>necessary for performing assigned<br>work functions, except for CIP<br>Exceptional Circumstances. | A signed document, automated<br>workflow approval or email showing<br>persons with access to BES Cyber<br>System Information have<br>authorization, and similar or the same<br>records showing the consideration of<br>appropriate privileges on the basis of<br>need in performing a work function<br>were considered as part of the<br>authorization. |
|--|--|--|---|
| Reference to prior version:<br>CIP-003-4, R5.2 |  | <b>Change Rationale:</b> <i>CIP-003-4, CIP-004-4,</i><br><i>authorization of access in some form, an</i><br><i>authorization on a "need to know" basis</i><br><i>performed. These were consolidated to a</i><br><i>language.</i>   | d CIP-003 and CIP-007 require<br>or with respect to work functions  |

| CIP-004-5 Table R6 Access Management Program |  |  |  |
|--|--|--|--|
| Part   | <b>Applicability</b>   | Requirements   | Measures   |
| <del>6.5</del>                               | High Impact BES Cyber Systems<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivity<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems | Verify at least once each calendar<br>quarter that individuals provisioned for<br>authorized electronic access or<br>authorized unescorted physical access<br>have associated authorization records. | <ul> <li>Evidence may include, but is not<br/>limited to:</li> <li>Dated documentation of the<br/>verification between the system<br/>generated list of individuals who<br/>have been authorized for access<br/>(i.e., workflow database) and a<br/>system generated list of personnel<br/>who have access (i.e., user account<br/>listing), or</li> <li>Documentation of the dated<br/>verification between a list of<br/>individuals who have been<br/>authorized for access (i.e.<br/>authorization forms) and a list of<br/>individuals provisioned for access<br/>(i.e. provisioning forms or shared<br/>account listing).</li> </ul> |

| CIP-004-5 Table <mark>R6<u>R4</u> – Access Management Program</mark> |  |   |  |
|--|--|---|--|
| Part   | ApplicabilityApplicable Systems  | Requirements  | Measures   |
| <del>6.6</del> <u>4</u><br>. <u>3</u>                                | High Impact BES Cyber Systems and their<br>associated:<br>1. EACMS; and<br>2. PACS<br>Medium Impact BES Cyber Systems with<br>External Routable Connectivity or dial-up<br>connectivityand their associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems<br>1. EACMS; and<br>2. PACS | For electronic access, verify at least once<br>each calendar year, not to exceed <u>every</u><br>15 calendar months-between<br>verifications, that all user accounts, user<br>account groups, or user role categories,<br>and their specific, associated privileges<br>are correct and are those that the<br>Responsible Entity determines <u>are</u><br>necessary-for performing assigned work<br>functions. | <ul> <li>EvidenceAn example of evidence<br/>may include, but is not limited to,<br/>documentation of the review<br/>includingthat includes all of the<br/>following:</li> <li>1. A dated listing of all<br/>accounts/account groups or<br/>roles within the system;</li> <li>2. A summary description of<br/>privileges associated with<br/>each group or role;</li> <li>3. Accounts assigned to the<br/>group or role; and</li> <li>4. Dated evidence showing<br/>verification of the privileges<br/>for the group are authorized<br/>and appropriate to the work<br/>function performed by<br/>people assigned to each<br/>account.</li> </ul> |
|  | ence to prior version:<br>07-4, R5.1.3   | <b>Change Rationale:</b> Moved requirements to<br>cross-referencing of requirements. Clarified<br>verification by stating the objective was to<br>correct and the minimum necessary for per   | d what was necessary in performing<br>confirm that access privileges are   |

| CIP-004-5 Table <mark>R6<mark>R4</mark> – Access Management Program</mark> |  |  |   |
|--|--|--|---|
| Part   | ApplicabilityApplicable Systems  | Requirements   | Measures  |
| <del>6.74</del><br>. <u>4</u>  | High Impact BES Cyber Systems and their<br>associated:<br>1. EACMS; and<br>2. PACS<br>Medium Impact BES Cyber Systems with<br>External Routable Connectivity or dial-up<br>connectivityand their associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems<br>1. EACMS; and<br>2. PACS | Verify at least once per calendar year,<br>but not to exceedevery 15 calendar<br>months between verifications, that<br>access to the physical and<br>electronic designated storage locations<br>where for BES Cyber System Information<br>is stored by the Responsible Entity,<br>whether physical or electronic, are<br>correct and are those that the<br>Responsible Entity determines are<br>necessary for performing assigned work<br>functions. | <ul> <li>EvidenceAn example of evidence<br/>may include, but is not limited to,<br/>the following documentation of the<br/>review that includes all of the<br/>following:</li> <li>1. A dated listing of<br/>authorizations for BES Cyber<br/>System information;</li> <li>2. Any privileges associated<br/>with the authorizations; and</li> <li>3. Dated evidence showing a<br/>verification of the<br/>authorizations and any<br/>privileges were confirmed<br/>correct and the minimum<br/>necessary for performing<br/>assigned work functions.</li> </ul> |
| Reference to prior version:<br>CIP-003-4, R5.1.2                           |  | <b>Change Rationale:</b> Moved requirement to<br>reviews. Clarified precise meaning of annu<br>performing a verification by stating the ob<br>privileges are correct and the minimum ne<br>functions.  | al. Clarified what was necessary in jective was to confirm access   |

**Rationale for R57**: 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 (i.e.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 all 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).

**Summary of Changes:** FERC Order No. 706, Paragraphs 460 and 461, state the following: <u>"</u>The Commission adopts the CIP NOPR proposal to direct the ERO to develop modifications to CIP-004-1 to require immediate revocation of access privileges when an employee, contractor or vendor no longer performs a function that requires physical or electronic access to a Critical Cyber Asset for any reason (including disciplinary action, transfer, retirement, or termination).

As a general matter, the Commission believes that revoking access when an employee no longer needs it, either because of a change in job or the end of employment, must be immediate."

<del>R7</del>

- R5. Each Responsible Entity shall implement, in a manner that identifies, assesses, and corrects deficiencies, one or more documented access revocation programs that collectively include each of the applicable itemsrequirement parts in CIP-004-5 Table R7R5 Access Revocation. [Violation Risk Factor: Lower] [Time Horizon: Same Day Operations and Operations Planning].
- **M7M5.** Evidence must include each of the applicable documented programs that collectively include each of the applicable itemsrequirement parts in *CIP-004-5 Table* <u>R7R5</u> – *Access Revocation* and additional evidence to demonstrate implementation as described in the Measures column of the table.

|   | CIP  | -004-5 Table <del>R7<u>R5</u> –</del> Access Revocation   |   |
|---|--|---|---|
| Part  | ApplicabilityApplicable Systems  | Requirements  | Measures  |
| <del>7</del> <u>5</u> .1  | High Impact BES Cyber Systems and<br>their associated:<br>1. EACMS; and<br>2. PACS<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivityand their<br>associated:<br>Associated Physical Access Control<br>Systems<br>1. Associated Electronic Access<br>Control or Monitoring<br>SystemsEACMS; and<br>2. PACS | For all termination actions, initiate<br>the <u>A</u> process to revoke the <u>initiate</u><br>removal of an individual's <u>ability for</u><br>unescorted physical access and<br>Interactive Remote Access upon the<br>effective date and time of the <u>a</u><br>termination action, and complete the<br>revocation <u>removals</u> within 24 hours<br>after the effective date and time of the<br>termination action <del>=</del> (Removal of the<br>ability for access may be different than<br>deletion, disabling, revocation, or<br>removal of all access rights). | <ul> <li>Evidence An example of evidence may include, but is not limited to, documentation of all of the following:</li> <li>1. Dated workflow or sign-off form verifying access removal associated with the termination action; and</li> <li>2. Logs or other demonstration showing such persons no longer have access.</li> </ul> |
| <b>77Reference</b> Reference to prior version:<br>CIP 004-4, R4.2 |  | <b>Change Rationale:</b> The FERC Order No. 7<br>modifications to the Standards <b>to require</b><br>no longer needing access. To address this<br>revocation concurrent with the terminati  | e immediate revocation for any person is directive, this requirement specifies  |

|                          | CIP   | -004-5 Table <del>R7<u>R5</u> –</del> Access Revocation  |   |
|--------------------------|---|--|---|
| <br>Part                 | ApplicabilityApplicable Systems   | Requirements   | Measures  |
| <del>7</del> <u>5</u> .2 | High Impact BES Cyber Systems and<br>their associated:<br>1. EACMS; and<br>2. PACS<br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity or<br>dial-up connectivityand their<br>associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems<br>1. EACMS; and<br>2. PACS | For reassignments or transfers, revoke<br>the individual's <u>authorized</u> electronic<br><del>and</del> access to individual accounts and<br><u>authorized unescorted</u> physical access<br>that the Responsible Entity determines<br><u>isare</u> not necessary by the end of the<br>next calendar day following the<br><u>reassignment or transferdate that the</u><br><u>Responsible Entity determines that the</u><br><u>individual no longer requires retention</u><br><u>of that access</u> . | <ul> <li>Evidence An example of evidence may include, but is not limited to, documentation of all of the following:</li> <li>1. Dated workflow or sign-off form showing a review of logical and physical access; and</li> <li>2. Logs or other demonstration showing such persons no longer have access that the Responsible Entity determines is not necessary.</li> </ul> |
|                          | ence to prior version:<br>04-4, R4.2  | <b>Change Rationale:</b> FERC Order No. 706, F<br>modifications to the Standards to require<br>longer needing access, including transfer<br>modify this requirement, the SDT determ<br>access after a transfer was problematic k<br>As a result, the SDT adapted this requirer<br>review access authorizations on the date<br>more effective control in accomplishing t<br>accumulating unnecessary authorizations   | e immediate revocation for any person no<br>red employees. In reviewing how to<br>ined the date a person no longer needs<br>because the need may change over time.<br>ment from NIST 800-53 Version 3 to<br>of the transfer. The SDT felt this was a<br>he objective to prevent a person from   |

|                    | CIP.   | -004-5 Table <mark>87<u>R5</u> – Access Revocation</mark>  |   |  |
|--------------------|--|--|---|--|
| Part               | ApplicabilityApplicable Systems  | Requirements   | Measures  |  |
| <b>7<u>5</u>.3</b> | High Impact BES Cyber Systems and<br>their associated:<br><u>1. EACMS; and</u><br><u>2. PACS</u><br>Medium Impact BES Cyber Systems<br>with External Routable Connectivity <del>or</del><br>dial up connectivityand their<br>associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control<br>or Monitoring Systems<br><u>1. EACMS; and</u><br><u>2. PACS</u> | For termination actions, revoke the<br>individual's access to the physical and<br>electronic-designated storage locations<br>wherefor BES Cyber System<br>Information-is stored by the<br>Responsible Entity, whether physical or<br>electronic (unless already revoked<br>according to Requirement R5.1), by the<br>end of the next calendar day following<br>the effective date and time of the<br>termination action.   | EvidenceAn example of evidence may<br>include, but is not limited to, workflow<br>or sign-off form verifying access<br>removal to designated physical areas or<br>cyber systems containing BES Cyber<br>System Information associated with the<br>terminations and dated within the next<br>calendar day of the termination action. |  |
| Refere<br>NEW      | ence to prior version:   | <b>Change Rationale:</b> FERC Order No. 706, Paragraph 386, directs modifications to the standards to require prompt revocation of access to protected information. To address this directive, Responsible Entities are required to revoke access to areas designated for BES Cyber System Information. This could include records closets, substation control houses, records management systems, file shares or other physical and logical areas under the Responsible Entity's control. |   |  |

|                          | CIP  | -004-5 Table <mark>R7<u>R5</u> – Access Revocation</mark>   |  |
|--------------------------|--|---|--|
| Part                     | ApplicabilityApplicable Systems  | Requirements  | Measures   |
| <del>7</del> <u>5</u> .4 | High Impact BES Cyber Systems <u>and</u><br><u>their associated:</u><br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control<br>or Monitoring Systems<br><u>• EACMS</u> | For termination actions, revoke the individual's <u>non-shared</u> user accounts on BES Cyber Assets (unless already revoked in accordance with Requirements R7according to Parts 5.1 or R75.3) within 30 calendar days of the effective date of the termination action.  | EvidenceAn example of evidence may<br>include, but is not limited to, workflow<br>or sign-off form showing access<br>removal for any individual BES Cyber<br>Assets and software applications as<br>determined necessary to completing<br>the revocation of access and dated<br>within thirty calendar days of the<br>termination actions. |
| Refere<br>NEW            | ence to prior version:   | <b>Change Rationale:</b> FERC Order No. 706,<br>modifications to the Standards to require<br>longer needing access. In order to meet<br>Entities will likely have initial revocation<br>physical access to the BES Cyber System.<br>coordinate access revocation on individu<br>affecting reliability. This requirement pro<br>complete the revocation process. Althou<br>further access, this step provides addition<br>process. | e immediate revocation for any person no<br>the immediate timeframe, Responsible<br>procedures to prevent remote and<br>Some cases may take more time to<br>al Cyber Assets and applications without<br>pvides the additional time to review and<br>gh the initial actions already prevent   |

|   |               | CIP-  | -004-5 Table <mark>87<u>R5</u> – Access Revocation</mark>  |   |
|---|---------------|---|--|---|
| ( | Part          | ApplicabilityApplicable Systems   | Requirements   | Measures  |
| - | 7 <u>5</u> .5 | High Impact BES Cyber Systems and<br>their associated:<br>Associated Physical Access Control<br>Systems<br>Associated Electronic Access Control or<br>Monitoring Systems<br>• EACMS | For termination actions <del>, reassignments,<br/>or transfers</del> , change passwords for<br>shared account(s) known to the user<br>within 30 calendar days of the<br>termination action <del>, reassignment, or<br/>transfer of the user. <u>For</u><br/>reassignments or transfers, change<br/>passwords for shared account(s) known<br/>to the user within 30 calendar days<br/>following the date that the Responsible<br/>Entity determines that the individual no<br/>longer requires retention of that<br/>access.<br/>If the Responsible Entity determines<br/>and documents that extenuating<br/>operating circumstances require a<br/>longer time period, change the<br/>password(s) within 10 calendar days<br/>following the end of the operating<br/>circumstances.</del> | <ul> <li>EvidenceExamples of evidence may include, but isare not limited to:</li> <li>Workflow or sign-off form showing password reset within 30 calendar days of the termination; or</li> <li>Workflow or sign-off form showing password reset within 30 calendar days of the reassignments or transfers; or</li> <li>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.</li> </ul> |
|   |               | ence to prior version:  | Change Rationale:  |   |
| ( | CIP-00        | )7-4, R5.2.3  | To provide clarification of expected action  | ns in managing the passwords.   |

### **G**.Compliance

### 1. Compliance Monitoring Process:

### **1.1. Compliance Enforcement Authority:**

The Regional Entity shall serve as the Compliance Enforcement Authority ("CEA") unless the applicable entity is owned, operated, or controlled by the Regional Entity. In such cases the ERO or a Regional <u>entityEntity</u> approved by FERC or other applicable governmental authority shall serve as the CEA.

### **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 Compliance Enforcement AuthorityCEA 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 data or evidence for<u>of</u> each requirement in this standard for three calendar years or for the duration of any regional or Compliance Enforcement Authority investigation; whichever is longer.
- 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 <u>durationtime</u> specified above, whichever is longer.
- The Compliance Enforcement AuthorityThe CEA shall keep the last audit records and all requested and submitted subsequent audit records.

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

- Compliance Audit
- Self-Certification
- Spot Checking
- Compliance Investigation
- Self-Reporting
- Complaint

#### **1.4. Additional Compliance Information:**

• None

### **Table of Compliance Elements**

| <del>R.</del> # | Time  | VRF    | Violation Severity Levels   |   |  |  |
|-----------------|---|--------|---|---|--|--|
|                 | Horizon                                       |        | Lower VSL   | Moderate VSL  | High VSL   | Severe VSL   |
| <del>R1</del>   | <del>Operations</del><br><del>Planning</del>  | Lower  | The Responsible Entity<br>did not convey on-<br>going security<br>awareness<br>reinforcement at least<br>once for a calendar  | The Responsible Entity<br>did not convey on-<br>going security<br>awareness<br>reinforcement at least<br>once for a calendar  | The Responsible Entity<br>did not convey on-<br>going security<br>awareness<br>reinforcement at least<br>once for a calendar   | The Responsible Entity<br>did not document a<br>security awareness<br>program. (R1)                        |
|                 |   |        | quarter and did so less<br>than 10 calendar days<br>after the start of a<br>subsequent calendar<br>quarter. (1.1)   | quarter and did so<br>between 10 and 30<br>calendar days after the<br>start of a subsequent<br>calendar quarter. (1.1)  | quarter and did so<br>beyond 30 calendar<br>days after the start of<br>a subsequent calendar<br>quarter. (1.1)   |  |
| <del>R2</del>   | <del>Operations</del><br><del>Planning</del>  | Lower  | The Responsible Entity<br>did define the roles<br>that require training<br>and did have the<br>required role based<br>training, but did not<br>include 1 of the<br>required training<br>content as detailed in<br>2.2 through 2.10. | The Responsible Entity<br>did define the roles<br>that require training<br>and did have the<br>required role based<br>training, but did not<br>include 2 of the<br>required training<br>content as detailed in<br>2.2 through 2.10. | The Responsible Entity<br>did define the roles<br>that require training<br>and did have the<br>required role based<br>training, but did not<br>include 4 or more of<br>the training content as<br>detailed in 2.2 through<br>2.10. | The Responsible Entity<br>did not have the<br>required role-based<br>training. (R2)                        |
| <del>R3</del>   | <del>Operations</del><br><del>Planning,</del> | Medium | With the exception of<br>policy-identified CIP<br>Exceptional<br>Circumstances, the<br>Responsible did not  | With the exception of<br>policy-identified CIP<br>Exceptional<br>Circumstances, the<br>Responsible did not  | With the exception of<br>policy-identified CIP<br>Exceptional<br>Circumstances, the<br>Responsible did not   | With the exception of<br>policy-identified CIP<br>Exceptional<br>Circumstances, the<br>Responsible did not |

| <del>R.</del> # | <del>∓ime</del>                              | VRF    | Violation Severity Levels   |   |   |  |
|-----------------|--|--------|---|---|---|--|
|                 |  |        | Lower VSL   | Moderate VSL  | High VSL  | Severe VSL   |
|                 |  |        | train 1 individual prior<br>to their being granted<br>electronic and<br>unescorted physical<br>access in a calendar<br>year. (3.1)<br>OR<br>The Responsible Entity<br>did not train 1<br>individual authorized<br>for electronic and<br>unescorted physical<br>access in a calendar<br>year not exceeding 15<br>months between<br>training. (3.2) | train 2 individuals<br>prior to their being<br>granted electronic and<br>unescorted physical<br>access in a calendar<br>year. (3.1)<br>OR<br>The Responsible Entity<br>did not train 2<br>individuals authorized<br>for electronic and<br>unescorted physical<br>access in a calendar<br>year not exceeding 15<br>months between<br>training. (3.2) | train 3 individuals<br>prior to their being<br>granted electronic and<br>unescorted physical<br>access in a calendar<br>year. (3.1)<br>OR<br>The Responsible Entity<br>did not train 3<br>individuals authorized<br>for electronic and<br>unescorted physical<br>access in a calendar<br>year not exceeding 15<br>months between<br>training. (3.2) | train 4 or more<br>individuals prior to<br>their being granted<br>electronic and<br>unescorted physical<br>access in a calendar<br>year. (3.1)<br>OR<br>The Responsible Entity<br>did not train 4 or more<br>individuals authorized<br>for electronic and<br>unescorted physical<br>access in a calendar<br>year not exceeding 15<br>months between<br>training. (3.2)<br>OR<br>The Responsible Entity<br>did not implement at<br>all its cyber security<br>training program. (R3) |
| R4              | <del>Operations</del><br><del>Planning</del> | Medium | <del>N/A</del>  | The Responsible Entity<br>has a personnel risk<br>assessment program,<br>as stated in   | The Responsible Entity<br>has a personnel risk<br>assessment program,<br>as stated in   | The Responsible Entity<br>did not have a<br>personnel risk<br>assessment program,  |

| ŧ | <b>}</b> # | Time                   | VRF    |  | Violation Se   | verity Levels  |  |
|---|------------|------------------------|--------|--|--|--|--|
|   |            |                        |        | Lower VSL  | Moderate VSL   | High VSL   | Severe VSL   |
|   |            |                        |        |  | Requirement R4, for<br>individuals having<br>authorized cyber or<br>authorized unescorted<br>physical access, but<br>the program does not<br>include identity<br>verification or a<br>criminal history<br>records check. (4.1)<br>(4.2)  | Requirement R4, for<br>individuals having<br>authorized cyber or<br>authorized unescorted<br>physical access, but<br>the program did not<br>include the required<br>documented results or<br>the program did not<br>include criteria or<br>process to determine<br>when authorized<br>access shall not be<br>granted. (4.3)(4.5) | as stated in<br>Requirement R4, for<br>individuals having<br>authorized cyber or<br>authorized unescorted<br>physical access. (R4)   |
|   | R5         | Same Day<br>Operations | Medium | Except for CIP<br>Exceptional<br>Circumstances, the<br>Responsible Entity did<br>not perform personnel<br>risk assessments for 1<br>individual prior to<br>granting authorized<br>electronic and<br>unescorted physical<br>access in a calendar<br>year. (5.1)<br>OR | Except for CIP<br>Exceptional<br>Circumstances, the<br>Responsible Entity did<br>not perform personnel<br>risk assessments for 2<br>individuals prior to<br>granting authorized<br>electronic and<br>unescorted physical<br>access in a calendar<br>year. (5.1) OR<br>The Responsible Entity<br>did not update | Except for CIP<br>Exceptional<br>Circumstances, the<br>Responsible Entity did<br>not perform personnel<br>risk assessments for 3<br>individuals prior to<br>granting authorized<br>electronic and<br>unescorted physical<br>access in a calendar<br>year. (5.1)<br>OR  | The Responsible Entity<br>did not have a<br>documented process<br>for personnel risk<br>assessments. (R5)<br>OR<br>Except for CIP<br>Exceptional<br>Circumstances, the<br>Responsible Entity did<br>not perform personnel<br>risk assessments for 4<br>or more individuals |

| <del>R</del> # | Time  | VRF   | Violation Severity Levels   |   |   |  |
|----------------|---|-------|---|---|---|--|
|                | Horizon   |       | Lower VSL   | Moderate VSL  | High VSL  | Severe VSL   |
|                |   |       | The Responsible Entity<br>did not update<br>personnel risk<br>assessments every<br>seven years for 1<br>individual within seven<br>years after the initial<br>performance or last<br>update of the<br>personnel risk<br>assessment. (5.2)   | personnel risk<br>assessments every<br>seven years for 2<br>individuals within<br>seven years after the<br>initial performance or<br>last update of the<br>personnel risk<br>assessment. (5.2)  | The Responsible Entity<br>did not update<br>personnel risk<br>assessments every<br>seven years for 3 or<br>more individuals<br>within seven years<br>after the initial<br>performance or last<br>update of the<br>personnel risk<br>assessment. (5.2)                                 | prior to granting<br>authorized electronic<br>and unescorted<br>physical access in a<br>calendar year. (5.1)   |
| R6             | Operations<br>Planning<br>and Same<br>Day<br>Operations | Lower | The Responsible Entitydid not authorize orhave the individual(s)designated in 6.1authorize electronicaccess, unescortedphysical access, oraccess to the physicaland electroniclocations where BESCyber SystemInformation is storedby the ResponsibleEntity that theResponsible Entity | The Responsible Entity<br>did not authorize or<br>have the individual(s)<br>designated in 6.1<br>authorize electronic<br>access, unescorted<br>physical access, or<br>access to the physical<br>and electronic<br>locations where BES<br>Cyber System<br>Information is stored<br>by the Responsible<br>Entity that the<br>Responsible Entity | The Responsible Entitydid not authorize orhave the individual(s)designated in 6.1authorize electronicaccess, unescortedphysical access, oraccess to the physicaland electroniclocations where BESCyber SystemInformation is storedby the ResponsibleEntity that theResponsible Entity | The Responsible Entitydid not have adocumented processfor accessmanagement. (R6)ORThe Responsible Entitydid not designate oneor more individual(s)to authorize electronicaccess, unescortedphysical access, oraccess to the physicaland electronic |

| <del>R</del> # | Time    | VRF |  | Violation Se                                 | verity Levels                                       |   |
|----------------|---------|-----|--|--|---|---|
|                | Horizon |     | Lower VSL  | Moderate VSL                                 | High VSL  | Severe VSL  |
|                |         |     | Lower VSL<br>determined was<br>necessary for<br>performing assigned<br>work functions. (6.2)<br>(6.3) (6.4)<br>OR<br>The Responsible Entity<br>did verify within 17<br>calendar months but<br>not within 15 calendar<br>months that: (6.6)<br>(6.7)<br>- all user<br>accounts, user<br>account<br>groups, and<br>user role<br>categories<br>were correct,<br>or<br>- their specific,<br>associated<br>privileges were<br>correct or that<br>they were<br>those that that |  |   | Severe VSL  Iocations where BES Cyber System Information is stored by the Responsible Entity. (6.1)  OR  The Responsible Entity did not authorize or have the individual(s) designated in 6.1 authorize electronic access, unescorted physical access, and access to the physical and electronic locations where BES Cyber System Information is stored by the Responsible Entity determined was necessary for performing assigned work functions and three or more users |
|                |         |     | <del>the</del><br><del>Responsible</del>   | not within 17 calendar<br>months that: (6.6) | <del>associated</del><br><del>privileges were</del> | were granted access<br>without authorization  |

| R.# Time VRF |   | Violation Seve  | erity Levels   |  |
|--------------|---|---|--|--|
| Horizon      | Lower VSL   | Moderate VSL  | High VSL   | Severe VSL   |
|              | Entity<br>determined<br>necessary for<br>performing<br>assigned work<br>functions.<br>access to the<br>physical and<br>electronic<br>locations<br>where BES<br>Cyber System<br>Information is<br>stored by the<br>Responsible<br>Entity was<br>correct or that<br>the access was<br>what the<br>Responsible<br>Entity<br>determined<br>necessary for<br>performing<br>assigned work<br>functions. | (6.7)       all user     accounts, user     account     groups, and     user role     categories     were correct,     or      their specific,     associated     privileges were     correct or that     they were     those that the     Responsible     Entity     determined     necessary for     performing     assigned work     functions.      access to the     physical and     electronic     locations | correct or that<br>they were<br>those that that<br>the<br>Responsible<br>Entity<br>determined<br>necessary for<br>performing<br>assigned work<br>functions.<br>• access to the<br>physical and<br>electronic<br>locations<br>where BES<br>Cyber System<br>Information is<br>stored by the<br>Responsible<br>Entity was<br>correct or that<br>the access was<br>what the<br>Responsible<br>Entity | by the individual(s)<br>designated in 6.1. (6.2)<br>(6.3) (6.4)<br>OR<br>The Responsible Entity<br>did not verify within<br>24 calendar months<br>that: (6.6) (6.7)<br>• all user<br>accounts, user<br>account<br>groups, and<br>user role<br>categories<br>were correct,<br>or<br>• their specific,<br>associated<br>privileges were<br>correct or that<br>they were the<br>those that that<br>the<br>Responsible<br>Entity |

| <del>R</del> # | Time              | VRF    | VRF Violation Severity Levels |                            |                                   |                                   |  |
|----------------|-------------------|--------|-------------------------------|----------------------------|-----------------------------------|-----------------------------------|--|
|                | Horizon           |        | Lower VSL                     | Moderate VSL               | High VSL                          | Severe VSL                        |  |
|                |                   |        |                               | Information is             | <del>performing</del>             | <del>performing</del>             |  |
|                |                   |        |                               | <del>stored by the</del>   | assigned work                     | assigned work                     |  |
|                |                   |        |                               | <b>Responsible</b>         | functions.                        | functions, or                     |  |
|                |                   |        |                               | Entity was                 |                                   | <ul> <li>access to the</li> </ul> |  |
|                |                   |        |                               | <del>correct or that</del> |                                   | physical and                      |  |
|                |                   |        |                               | the access was             |                                   | electronic                        |  |
|                |                   |        |                               | what the                   |                                   | locations                         |  |
|                |                   |        |                               | <b>Responsible</b>         |                                   | where BES                         |  |
|                |                   |        |                               | <del>Entity</del>          |                                   | Cyber System                      |  |
|                |                   |        |                               | determined                 |                                   | Information is                    |  |
|                |                   |        |                               | necessary for              |                                   | <del>stored by the</del>          |  |
|                |                   |        |                               | <del>performing</del>      |                                   | Responsible                       |  |
|                |                   |        |                               | assigned work              |                                   | Entity was                        |  |
|                |                   |        |                               | functions.                 |                                   | correct or that                   |  |
|                |                   |        |                               |                            |                                   | the access was                    |  |
|                |                   |        |                               |                            |                                   | what the                          |  |
|                |                   |        |                               |                            |                                   | Responsible                       |  |
|                |                   |        |                               |                            |                                   | <del>Entity</del>                 |  |
|                |                   |        |                               |                            |                                   | determined                        |  |
|                |                   |        |                               |                            |                                   | necessary for                     |  |
|                |                   |        |                               |                            |                                   | <del>performing</del>             |  |
|                |                   |        |                               |                            |                                   | assigned work                     |  |
|                |                   |        |                               |                            |                                   | functions.                        |  |
| <del>R7</del>  | Same Day          | Medium | Revocation of access          | The Responsible Entity     | The Responsible Entity            | The Responsible Entity            |  |
|                | <b>Operations</b> |        | to BES Cyber                  | did not revoke             | did not revoke                    | did not have a                    |  |
|                | •                 |        | Information was not           | unneeded unescorted        | unneeded unescorted               | documented process                |  |
|                | and<br>Operations |        | accomplished for 1 or         | physical or electronic     | <del>physical or electronic</del> | for initiating the                |  |
|                | Operations        |        | more individuals              | access within the          | access according to               | unescorted physical or            |  |
|                | Planning          |        |                               |                            |                                   |                                   |  |

| <del>R.</del> # | Time    | VRF |  | Violation Se   | verity Levels  |  |
|-----------------|---------|-----|--|--|--|--|
|                 | Horizon |     | Lower VSL  | Moderate VSL   | High VSL   | Severe VSL                               |
|                 |         |     | within the specified   | specified times in CIP-  | the specified times in   | electronic access                        |
|                 |         |     | time frame (7.3);  | <del>004 5 R7 for one</del>  | CIP 004 5 R7 for two   | revocation process; OR                   |
|                 |         |     | <del>OR</del>  | individual who was<br>terminated, resigned,                                  | individuals who were<br>terminated, resigned,                          | The Responsible Entity<br>did not revoke |
|                 |         |     | User accounts on BES<br>Cyber Assets were not<br>revoked for one or<br>more individuals<br>within the specified<br>time frame (7.4);<br>OR<br>User passwords on<br>BES Cyber Asset<br>shared accounts were<br>not changed for one or<br>more individuals<br>within the specified<br>time frame; (7.5)<br>OR<br>Following the<br>determination and<br>documentation of<br>extenuating operating<br>circumstances,<br>passwords for shared | terminated, resigned,<br>was reassigned, or<br>transferred. (7.1 and<br>7.2) | terminated, resigned,<br>reassigned or<br>transferred.(7.1 and<br>7.2) | •  |
|                 |         |     | accounts were not<br>changed for one or  |  |  |  |

| <del>R.#</del> |         | VRF | Violation Severity Levels  |              |          |            |
|----------------|---------|-----|--|--------------|----------|------------|
|                | Horizon |     | Lower VSL  | Moderate VSL | High VSL | Severe VSL |
|                |         |     | more individuals<br>within 10 days<br>following the end of<br>the extenuating<br>operating<br>circumstances. (7.5) |              |          |            |

# **D**.Regional Variances

None.

# E.Interpretations

None.

## F.Associated Documents

None.

### **Guidelines and Technical Basis**

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

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

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

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 reference soundreinforce 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.).

Guidance: Describe example mechanisms used to demonstrate the availability of this information

#### **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 <u>Responsible Entity has the flexibility to define the</u> training <u>program and it</u> may consist of multiple modules and multiple delivery mechanisms, <u>but</u> 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.

Note: Provide guidance or a local definition of "role appropriate" as it is used in this standard.

### **Requirement R3:**

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. 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 <u>CIP Exceptional Circumstances</u>. To retain the authorized accesses, individuals <u>must complete the training at least one every 15 months</u>.

### **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 does not require reconfirmation during the tenure of employment.

NOTE: Program specified exceptional circumstances can include a specified individual to declare an emergency.

### **Requirement R4 and R5:**

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 when called for in CIP 004-1 Table R4 – Personnel Risk Assessment, 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, to ensure that personnel who have such access have had their identity verified, then been assessed for risk, 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.

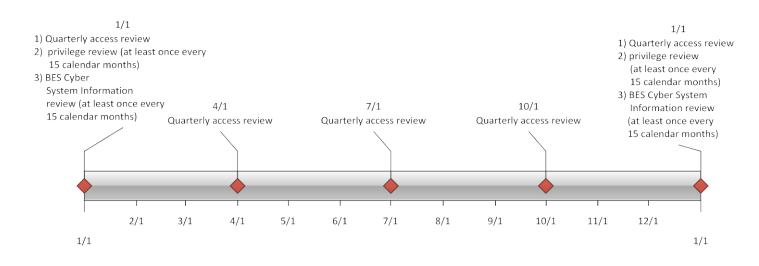
\_When it is not possible to perform a full seven year criminal history check, documentation must be made of what criminal history check was performed, and the reasons a full seven-year check could not be performed. Examples of this could include individuals under the age of 25 where a juvenile criminal history may be protected by law, <del>or</del>-individuals who may have resided in locations from where it is not possible to obtain a criminal history records check<del>,</del> 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 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 R6R4:

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 and annual 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 annual 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 perform the privilege review on individual accounts. An example timeline of all the reviews in Requirement R6R4 is included below.



Separation of duties should be considered when performing the reviews in Requirement R6R4. The person reviewing should be different than the person provisioning access.

If the results of quarterly or annualat 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 R6R4 are not applicable. However, the Responsible Entity should document such configurations.

### Requirement R7R5:

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 examplesscenarios 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<br>off site and the supervisor or human resources personnel<br>notify the appropriate personnel to begin the revocation<br>process. |  |
| Scheduled involuntary termination  | Human resources personnel are notified of the termination<br>and work with appropriate personnel to schedule the<br>revocation of access at the time of termination.                             |  |
| Termination prior to<br>notification   | Human resources personnel are notified of the termination<br>and work with appropriate personnel to schedule the<br>revocation of access at the time of termination.                             |  |
| Voluntary termination  | Human resources personnel are notified of the termination<br>and work with appropriate personnel to schedule the<br>revocation of access at the time of termination.                             |  |
| Retirement where the last<br>working day is several weeks<br>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 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 <u>R7R5</u>.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 <u>(i.e., accounts on the</u> <u>Cyber Asset itself)</u> 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, the requirement states a review of access privileges mustshould 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.