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35 36 37 38	U.S. Department of Commerce
39	Wilbur L. Ross, Jr., Secretary
40 41	National Institute of Standards and Technology
42	Kent Rochford, Acting NIST Director and Under Secretary of Commerce for Standards and Technology

National Institute of Standards and Technology Kent Rochford, Acting NIST Director and Under Secretary of Commerce for Standards and Technology

43 44 45 46	National Institute of Standards and Technology Interagency Report 8170 41 pages (May 2017)
47 48 49 50	Certain commercial entities, equipment, or materials may be identified in this document in order to describe an experimental procedure or concept adequately. Such identification is not intended to imply recommendation or endorsement by NIST, nor is it intended to imply that the entities, materials, or equipment are necessarily the best available for the purpose.
51 52 53 54 55 56	There may be references in this publication to other publications currently under development by NIST in accordance with its assigned statutory responsibilities. The information in this publication, including concepts and methodologies, may be used by federal agencies even before the completion of such companion publications. Thus, until each publication is completed, current requirements, guidelines, and procedures, where they exist, remain operative. For planning and transition purposes, federal agencies may wish to closely follow the development of these new publications by NIST.
57 58 59	Organizations are encouraged to review all draft publications during public comment periods and provide feedback to NIST. Many NIST cybersecurity publications, other than the ones noted above, are available at http://csrc.nist.gov/publications .
60	
61	Public comment period: May 12, 2017 through June 30, 2017
62 63 64 65	National Institute of Standards and Technology Attn: Applied Cybersecurity Division, Information Technology Laboratory 100 Bureau Drive (Mail Stop 2000) Gaithersburg, MD 20899-2000 Email: <u>nistir8170@nist.gov</u>
66 67 68	All comments are subject to release under the Freedom of Information Act (FOIA).

Reports on Computer Systems Technology

70 The Information Technology Laboratory (ITL) at the National Institute of Standards and 71 Technology (NIST) promotes the U.S. economy and public welfare by providing technical 72 leadership for the Nation's measurement and standards infrastructure. ITL develops tests, test 73 methods, reference data, proof of concept implementations, and technical analyses to advance 74 the development and productive use of information technology. ITL's responsibilities include the 75 development of management, administrative, technical, and physical standards and guidelines for 76 the cost-effective security and privacy of other than national security-related information in 77 federal information systems.

78

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82

Abstract

83 This publication assists federal agencies in strengthening their cybersecurity risk management by

84 helping them to determine an appropriate implementation of the *Framework for Improving*

85 *Critical Infrastructure Cybersecurity* (known as the Cybersecurity Framework). Federal agencies 86 can use the Cybersecurity Framework to complement the existing suite of NIST security and

87 privacy risk management standards, guidelines, and practices developed in response to the

Federal Information Security Management Act, as amended (FISMA). The relationship between

the Cybersecurity Framework and the National Institute of Standards and Technology (NIST)

90 Risk Management Framework are discussed in eight use cases.

91

Keywords

92 Cybersecurity Framework; Federal Information Security Management Act (FISMA); Risk

93 Management Framework (RMF); security and privacy controls

94 Supplemental Content

For additional information on NIST's cybersecurity programs, projects and publications, visit the
 Computer Security Resource Center, csrc.nist.gov. Information on other efforts at NIST and in

97 the Information Technology Laboratory (ITL) is available at www.nist.gov and www.nist.gov/itl.

98

Note to Reviewers

101 This document provides guidance on how the Framework for Improving Critical Infrastructure

102 Cybersecurity (Cybersecurity Framework) can be used in the U.S. federal government in

103 conjunction with the current and planned suite of NIST security and privacy risk management

104 publications. The specific guidance was derived from current Cybersecurity Framework use.¹

105 To provide federal agencies with examples of how the Cybersecurity Framework can augment 106 the current versions of NIST security and privacy risk management publications, this guidance

106 the current versions of NIST security and privacy risk management publications, this guidance 107 uses common federal information security vocabulary and processes.² NIST will engage with

agencies to add content based on agency implementation, refine current guidance and identify

additional guidance to provide the information that is most helpful to agencies. Feedback will

also help to determine which Cybersecurity Framework concepts are incorporated into future

111 versions of the suite of NIST security and privacy risk management publications. NIST would

112 like feedback that addresses the following questions:

- How can agencies use the Cybersecurity Framework, and what are the potential
 opportunities and challenges?
- How does the guidance presented in this draft report benefit federal agency cybersecurity risk management?
- How does the draft report help stakeholders to better understand federal agency use of the
 Cybersecurity Framework?
- How does the draft report inform potential updates to the suite of NIST security and privacy risk management publications to promote an integrated approach to risk management?
- Which documents among the suite of NIST security and privacy risk management
 publications should incorporate Cybersecurity Framework concepts, and where?
- How can this report be improved to provide better guidance to federal agencies?
- 125 126

Conventions

127 The phrase "federal agencies" in this publication means those agencies responsible for non-128 national security-related information in federal systems.

129 FISMA refers to the Federal Information Security Management Act of 2002, as amended.³

130 "Cybersecurity Framework" refers to version 1.0 of the "Framework for Improving Critical

131 Infrastructure Cybersecurity, issued in February 2014."⁴

¹ Such as use of the Industry Resources located at the Cybersecurity Framework Web site: <u>https://www.nist.gov/cyberframework/industry-resources</u>

² The suite of NIST security and privacy risk management publications include: Federal Information Processing Standards (FIPS) Publication 199, FIPS Publication 200, Special Publication (SP) 800-53, SP 800-37, SP 800-137, SP 800-39, and SP 800-30.

³ The Federal Information Security Management Act of 2002 was updated through the Federal Information Security Modernization Act of 2014.

⁴ The Framework for Improving Critical Infrastructure Cybersecurity is found at: https://www.nist.gov/cyberframework

- 132 The term "Tiers" cited in NIST Special Publication 800-39, *Managing Information Security*
- 133 Risk: Organization, Mission, and Information System View, will be referred to as "Levels" in this
- 134 report to avoid confusion with Cybersecurity Framework Implementation Tiers.
- 135 The six steps of the Risk Management Framework described in NIST Special Publication 800-
- 136 37, Guide for Applying the Risk Management Framework to Federal Information Systems: A
- 137 Security Life Cycle Approach Categorize, Select, Implement, Assess, Authorize, and Monitor -
- 138 are indicated using capital letters. This includes all conjugations (e.g., Authorize, Authorizing,
- and Authorized all refer to step five of the RMF).
- 140 The five Functions of the Cybersecurity Framework Identify, Protect, Detect, Respond, and
- 141 Recover are indicated using capital letters. This includes all conjugations (e.g., Detect,
- 142 Detected, and Detecting all refer to the Detect Function of Cybersecurity Framework).
- 143 The terms "enterprise risk management" and "organization-wide risk management" are used 144 interchangeably.
- 145

146Executive Summary

- 147 All federal agencies are charged and entrusted with safeguarding the information that is
- 148 contained in their systems and with ensuring that these systems operate securely and reliably. In
- a world where cyber systems are constantly challenged by more frequent and often more creative
- and sophisticated attacks, it is vital that agency personnel from the most senior executives to
- 151 line staff manage their assets and cybersecurity risks wisely. To do that well, they need the
- 152 most capable, up-to-date, and easy-to-use approaches and tools, including a holistic approach to
- 153 risk management.
- 154 The National Institute of Standards and Technology (NIST) is responsible for developing
- 155 standards and guidelines including minimum requirements to provide adequate information
- security for federal information and information systems. This suite of security and privacy risk
- 157 management standards and guidelines provides guidance for an integrated, organization-wide
- 158 program to manage information security risk. In response to a new executive order issued by the
- 159 President on May 11, 2017 and as part of its initiative to continuously improve the risk
- 160 management resources provided to federal agencies, NIST has produced this report providing
- 161 federal agencies with guidance on how the *Framework for Improving Critical Infrastructure*
- 162 *Cybersecurity* (known as the Cybersecurity Framework) can help agencies to complement
- 163 existing risk management practices and improve their cybersecurity risk management programs.
- 164 Developed by NIST in 2013-2014 working closely with the private and public sectors, the
- 165 Cybersecurity Framework is a risk management approach used voluntarily by organizations
- across the United States. It also is receiving attention in other countries and regions around the
- 167 world. Prepared initially to address cybersecurity challenges in the nation's critical infrastructure
- sectors, the voluntary Framework aligns with and complements the suite of NIST security and
- 169 privacy risk management standards and guidelines.
- 170 This report illustrates eight use cases in which federal agencies can leverage the Cybersecurity
- 171 Framework to address common cybersecurity-related responsibilities. By doing so, agencies can
- seamlessly integrate the Cybersecurity Framework with key NIST cybersecurity risk
- 173 management standards and guidelines already in wide use at various organizational levels. The
- result will be a more robust and mature agency-wide cybersecurity risk management program.
- 175 The eight use cases are:
- 176 1. Integrate Enterprise and Cybersecurity Risk Management
- 177 2. Manage Cybersecurity Requirements
- 178 *3. Integrate and Align Cybersecurity and Acquisition Processes*
- 179 *4. Evaluate Organizational Cybersecurity*
- 180 5. Manage the Cybersecurity Program
- 181 6. Maintain a Comprehensive Understanding of Cybersecurity Risk
- 182 7. Report Cybersecurity Risks
- 183 8. Inform the Tailoring Process
- 184 The key concepts of the Cybersecurity Framework and the proposed federal cybersecurity uses
- 185 described in this document are intended to promote the dialog with federal agencies. This will
- 186 inform near-term updates to the suite of applicable NIST cybersecurity and privacy risk
- 187 management publications, including updates to Special Publications 800-37 and 800-53.
- 188 Recognizing the importance of clear, timely guidance to assist agencies in carrying out their

- 189 cybersecurity-related responsibilities, NIST will use federal agency feedback to inform and
- 190 prioritize accelerated updates of those documents.

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1 Introduction

- 222 As part of its statutory responsibilities under the Federal Information Security Management Act
- as amended (FISMA), NIST develops standards and guidelines including minimum
- 224 requirements to provide adequate information security for all agency operations and assets.
- Fulfilling the requirements of FISMA and OMB Circular A-130⁵, these documents include
- 226 Federal Information Processing Standards (FIPS), Special Publications (SPs), and NIST
- 227 Interagency Reports (NISTIRs), which are used by agencies to develop, implement, and maintain
- 228 cybersecurity and privacy programs
- 229 The Cybersecurity Enhancement Act of 2014 formally updated NIST's role to include
- 230 identifying and developing cybersecurity risk frameworks for voluntary use by critical
- 231 infrastructure (CI) owners and operators. That statute's assignments included work NIST had
- begun in February 2013 as a result of Executive Order (EO) 13636, *Improving Critical*
- 233 *Infrastructure Cybersecurity.*⁶ The EO tasked the Department of Commerce to lead the
- 234 development of a framework to reduce CI cybersecurity risks. NIST convened industry,
- 235 academia, and government to develop a voluntary Framework for Improving Critical
- 236 Infrastructure Cybersecurity (known as the Cybersecurity Framework) that consists of standards,
- 237 methodologies, procedures, and processes that align policy, business, and technological
- approaches to address cybersecurity risks. It offers a high-level vocabulary for cybersecurity risk
- management, a taxonomy of cybersecurity outcomes, and a methodology to assess and manage
- those outcomes.
- 241 The increasing frequency, creativity, and variety of cyber attacks means that a greater emphasis
- 242 must be placed by all organizations on managing cybersecurity risk as a part of their enterprise
- risk management programs to fulfill their mission and business objectives. By seamlessly
- 244 integrating the Cybersecurity Framework and key NIST cybersecurity risk management
- standards and guidelines already in wide use at various organizational levels, agencies can
- 246 develop, implement, and continuously improve agency-wide cybersecurity risk management
- 247 processes that inform strategic, operational, and other enterprise risk decisions.⁷

248 1.1 Audience

- 249 This document is intended for those who are responsible for overseeing, leading, and managing
- 250 information systems within their agencies. That includes senior executives and line managers
- and staff and every level in between. It is especially relevant for personnel who develop,

⁶ https://www.federalregister.gov/documents/2013/02/19/2013-03915/improving-critical-infrastructure-cybersecurity

⁵ https://www.federalregister.gov/documents/2016/07/28/2016-17872/revision-of-omb-circular-no-a-130-managing-informationas-a-strategic-resource

⁷ While this report is intended to help federal agencies to incorporate key Cybersecurity Framework elements into their programs, *publication of this document will not affect the Cybersecurity Framework's primary focus on private sector critical infrastructure owners and operators*.

- 252 implement, report, and improve enterprise and cybersecurity risk management processes within
- their organizations. While the focus is on federal users, NIST expects that many public and
- 254 private sector organizations that choose to use the NIST cybersecurity risk management suite of
- standards and guidelines will benefit from this document, including the use cases that are
- 256 presented.

257 1.2 Organization of this Report

- 258 The remainder of this document is structured as follows:
- Section 2 provides guidance that includes eight descriptions of how federal agencies can
 effectively use the Cybersecurity Framework in conjunction with existing NIST standards
 and guidelines to develop, implement, and continuously improve their cybersecurity risk
 management programs.
- Section 3 describes plans for an integrated federal approach to cybersecurity risk
 management.
- Appendix A summarizes NIST cybersecurity risk management standards and guidelines.
- Appendix B lists and explains acronyms that appear in the document.
- Appendix C defines key terms.
- Appendix D lists references with additional information.

269 2 Guidance

Using eight common government cybersecurity needs, this section provides guidance that can
assist federal agencies as they develop, implement, and continuously improve their cybersecurity
risk management programs. It is consistent with OMB's policy guidance to federal agencies
contained in OMB Circular A-130, *Managing Information as a Strategic Resource*. That circular
provides guidance regarding the Risk Management Framework (described in NIST SP 800-37),
associated documents, and the Cybersecurity Framework.

276 277

OMB Circular A-130 Appendix I, Section 5.q

Responsibilities for Protecting and Managing Federal Information Resources

278The [Cybersecurity] Framework is not intended to duplicate the current information security279and risk management practices in place within the Federal Government. However, in the280course of managing information security risk using the established NIST Risk Management281Framework and associated security standards and guidelines required by FISMA, agencies282can leverage the Cybersecurity Framework to complement their current information security283programs.

NIST will work with federal agencies to assess the relative value of these eight proposed uses,
identify additional uses, and understand how to better illustrate applications of the Cybersecurity
Framework. The feedback received will guide and inform NIST as it incorporates Cybersecurity
Framework concepts into its various cybersecurity risk management publications. These uses
illustrate how agencies can leverage both the Cybersecurity Framework and the NIST Risk
Management Framework to:

- Measure and improve cybersecurity performance at various organizational levels;
- Organize communication about cybersecurity risk, activities, and results across the
 organization-wide risk management program; and
- Align and prioritize cybersecurity requirements for use in the acquisition process and to
 inform the tailoring of controls.

295 Figure 1 depicts federal cybersecurity risk management needs (middle column) superimposed on

the three-level pyramid found in one of the primary NIST cybersecurity documents used by

- 297 federal agencies Managing Information Security Risk: Organization, Mission, and Information
- 298 System View (SP 800-39). Most of the uses addressed in this publication fit in the
- 299 "Mission/Business Processes" (Level 2). One use is offered that illustrates the "Organization"
- 300 function (Level 1) and another addresses the "System" (Level 3). In the right column, Figure 1
- 301 also depicts the most applicable Cybersecurity Framework component Core, Profile(s), or
- 302 Implementation Tiers for a given federal use.

Special Publication 800-39	Level 1 Organization	Integrate enterprise and cybersecurity risk management by communicating with universally understood risk terms.	Core	9
		Manage cybersecurity requirements using a construct that enables integration and prioritization of <i>all</i> requirements.	Profile(s)	/bers
		Integrate and align cybersecurity and acquisition processes by relaying cybersecurity requirements and priorities in a common and concise language	Profile(s)	ecurity
	Level 2 Mission/ Business Processes	Evaluate organizational cybersecurity using a standardized and straightforward measurement scale and set of self-assessment criteria.	Implementation Tiers	Fran
		Manage the cybersecurity program by determining which cybersecurity outcomes necessitate common controls, and apportioning work and responsibility for those cybersecurity outcomes (supports RMF Implement & Monitor).	Profile(s)	nework C
		Maintain a comprehensive understanding of cybersecurity risk using a standardized organizing structure (supports RMF Authorize).	Core	omp
		Report cybersecurity risks using a universal and understandable reporting structure.	Core	onen
	Level 3 _{System}	Inform the tailoring process using a comprehensive reconciliation of all cybersecurity requirements (supports RMF Implement).	Profile(s)	ts

Figure 1: Federal Cybersecurity Uses

Federal agencies may determine additional ways the integrated federal approach can or should enhance their cybersecurity risk management programs. NIST intends to develop additional examples of uses based in part on feedback from federal agencies.

308 1. Integrate Enterprise and Cybersecurity Risk Management

309 Organizations manage many types of risk and develop specific policies to identify, assess, and 310 help mitigate adverse effects across a wide range of risks, with cybersecurity among them. Some 311 of the other typical risks include: safety, operations, financial, program, acquisitions, customer 312 interactions, supply chain, and privacy. Some of these areas employ different terminologies and 313 risk management approaches to make decisions within the risk area and across the organization 314 as part of an enterprise-wide management process. The Cybersecurity Framework provides 315 organizations the ability to leverage a common language that reaches beyond cybersecurity and 316 across the organization, while allowing these other risk management disciplines to incorporate 317 the Framework's terms or to continue using existing processes.

- 318 More specifically, the Cybersecurity Framework Core's five "Functions" offer a way to organize
- 319 cybersecurity risk management activities at their highest levels using words that can be applied
- across risk management disciplines: Identify, Protect, Detect, Respond, and Recover. Many
- 321 stakeholders from varied parts of an organization can understand and already use these five
- 322 words in the context of risk decisions. While the Cybersecurity Framework links them to
- 323 specific cybersecurity outcomes, other disciplines heavily dependent on risk management such as

- 324 finance and physical security may choose to integrate their unique processes and terminologies
- 325 into the Framework's Functions to facilitate communication.
- 326 For example, CISOs and other cybersecurity professionals in federal agencies can use these five
- 327 Functions as a way to engage, organize and explain their cybersecurity approaches to agency
- external stakeholders, executive leadership, and employees and to integrate cybersecurity 328
- 329 concepts into other organizational areas. The Functions provide an understandable and intuitive
- 330 language for CISOs to gather risk tolerance perspectives from their peers and leadership team.
- 331 The Functions are also a simple way to organize and express a risk strategy to address those risk
- 332 tolerances. This helps CISOs to collaborate with stakeholders from various parts of the
- 333 organization (e.g. human resources, finance, legal, acquisition) in identifying common priorities
- and assets and the risk-based strategies to address those common priorities. When representatives 334
- 335 across an organization are engaged and instrumental in identifying and prioritizing
- 336 organizational assets and determining risk management strategies, the results are more likely to
- 337 achieve the desired outcomes.
- 338 Integrate Enterprise and Cybersecurity Risk Management

Ber	efit(s):	Primary SP 800-39 Level:
•	Facilitate communication,	1 - Organization
•	Provide common language that reaches beyond cybersecurity risk management and encompasses other risk management disciplines.	Primary Cybersecurity Framework Component: Core

Summary: Using the Cybersecurity Framework's Functions (Identify, Protect, Detect, Respond, and Recover) as the basis for risk management dialogs, organizations can raise awareness of cybersecurity and other risks to be managed and facilitate communication among agency stakeholders, including executive leadership.⁸ This is enabled when other disciplines participating in the enterprise risk management dialog link their existing approaches to the Functions.

This Use example aggregates the activities of Uses 2-8.

Typical Participants: Head of Agency (Chief Executive Officer), Risk Executive (Function), Chief Information Officer, Senior Information Security Officer/Chief Information Security Officer (CISO), stakeholders representing other risk management disciplines (e.g., Finance, Human Resources, Acquisition).

Primary NIST Documents: NIST Special Publication 800-39, Cybersecurity Framework

339 2. Manage Cybersecurity Requirements

- 340 Federal agencies, like private sector organizations, are subject to multiple cybersecurity
- 341 requirements. For agencies, these may include (but are not limited to) laws, regulations,
- 342 oversight by and reports to Congress, internal policy, and Office of Management and Budget
- 343 policies. The Cybersecurity Framework can be used by federal agencies for requirements
- 344 management through the process of integration and prioritization.

⁸ Source: OMB A-130

- 345 Agencies can integrate requirements by aligning and de-conflicting using the structure of the
- 346 Core. For instance, a federal agency may need to abide by FISMA, the Health Insurance
- 347 Portability and Accountability Act (HIPAA) Security Rule, the Payment Card Industry Data
- 348 Security Standard, as well as their own cybersecurity policy, all while accomplishing a mission
- 349 objective. Applicable excerpts of these laws, guidelines, policy, and objectives can be aligned
- 350 with the various Functions, Categories, and Subcategores of the Core. By reconciling
- 351 cybersecurity requirements in this manner, a federal agency can determine where requirements
- 352 overlap and/or conflict, and consider alternative approaches, perhaps including modification of
- 353 cybersecurity requirements in that agency's control, to address those requirements. In turn, this
- 354 offers the agency the opportunity to improve its efficiency as well as its effectiveness.
- 355 By integrating requirements into the Core, agencies stage efficient prioritization. For instance, it
- 356 may be apparent that certain Subcategory outcomes are meaningful for multiple requirements. It
- 357 may also be clear that a short list of Subcategories are essential for successful achievement of
- 358 mission objectives. Priorities can be captured in the structure of the Core and used as inputs to
- 359 drive cybersecurity investments, effort, and focus.
- 360 The work product of cybersecurity requirements management using Cybersecurity Framework is
- 361 referred to as a Profile. See Appendix A for additional description and uses of Cybersecurity
- 362 Framework Profiles.

363	Manage	Cybersecurity	Requirements
-----	--------	---------------	--------------

 Benefit(s): Determine where cybersecurity requirements overlap and/or conflict in order to ensure compliance and improve efficiency and 	Primary SP 800-39 Level: 2 – Mission/Business Processes	
 effectiveness. Prioritize Subcategory outcomes based on the reconciliation of requirements, as well as mission priorities and the operational environment/threat information. Operationalize cybersecurity activities based on the Cybersecurity Framework Profile. 	Primary Cybersecurity Framework Components: Core, Profile(s)	
Summary: Federal agencies can use the Cybersecurity Framework Core Subcategories to align and de- conflict cybersecurity requirements applicable to their organizations. This reconciliation of requirements helps to ensure compliance and provides input in prioritizing requirements across the organization using the subcategory outcomes. This becomes a means of operationalizing cybersecurity activities and a tool for iterative, dynamic, and prioritized risk management for the agency.		
Typical Participants: Risk Executive, Chief Information Officer, Senior Information Security Officer/Chief Information Security Officer (CISO)		
Primary NIST Documents: NIST Special Publication 800-39, Cybersecurity Framework		

364 3. Integrate and Align Cybersecurity and Acquisition Processes

365 Federal agencies and contractors must adhere to both common and unique cybersecurity and

acquisition requirements⁹. In the acquisition process, this often causes a misunderstanding of
 expectations between federal agencies and offerors and may limit government access to the best

368 products and services, while increasing costs to offerors, agencies, and taxpayers.

369 The Cybersecurity Framework can be used to translate among a variety of risk management

370 practices and support federal agencies as they interact with a wide variety of suppliers. These

- 371 include service providers, product vendors, systems integrators, organizations within a regulated
- 372 sector, and other private sector partners.
- 373 For example, an agency could use the Cybersecurity Framework during market research by
- asking respondents to a Request For Information or Sources Sought Notice to include their
- 375 Cybersecurity Framework Profile or to express the cybersecurity capabilities of their product in
- 376 responses. This information would help the agency to better compare and contrast the
- 377 cybersecurity capabilities of organizations, products and services of respondents.
- 378 By using Profiles, the Cybersecurity Framework can be incorporated into the acquisition process
- 379 as the underpinning of: evaluation criteria (agency), solicitation response (supplier),

380 proposal/quote review (agency), minimum contract requirements (agency), contract compliance

381 evidence (supplier), and contract compliance verification (agency). The use of Profiles allows

- 382 suppliers the flexibility to select from among various standards and practices to meet federal
- 383 agency specific requirements, while communicating their cybersecurity posture in a consistent
- 384 way. It also provides agencies a means to consistently and objectively assess the cybersecurity
- 385 posture of potential partners.

386 Integrate and Align Cybersecurity and Acquisition Processes

 Benefit(s): Ability to determine which cybersecurity standards and practices to incorporate into contracts. 	Primary SP 800-39 Level: 2 – Mission/Business Processes	
 Provides a common language to communicate requirements to offerors and awardees (agreement/contract) Allows offerors to express their cybersecurity posture and related standards and practices. 	Primary Cybersecurity Framework Component: Profile(s)	
Summary: For acquisitions that present cybersecurity risks, federal agencies can choose to do business with organizations that meet minimum cybersecurity requirements in their operations and in the		

with organizations that meet minimum cybersecurity requirements in their operations and in the products and services they deliver. Cybersecurity Framework Profiles can be used by federal agencies to express technical requirements; offerors can demonstrate how they meet or exceed these requirements.

Typical Participants: Risk Executive (Function), Chief Information Officer, Senior Information Security Officer/Chief Information Security Officer (CISO), General Counsel, Contracting Office, Mission/Business owner

Primary NIST Documents: NIST Special Publications 800-39, 800-161, 800-171, Cybersecurity Framework

⁹ Compare, e.g., FAR § 52.204-21, Basic Safeguarding of Covered Contractor Information Systems (common), with DFARS 252.204-7012 Safeguarding Covered Defense Information and Cyber Incident Reporting (unique), and OMB Circular No. A-130, Managing Information as a Strategic Resource (common), with DoD Instruction 8500.01, Cybersecurity (unique).

387 *4. Evaluate Organizational Cybersecurity*

388 The Implementation Tiers are designed as an overarching measurement of cybersecurity risk

389 management behaviors within an organization. They help an organization to consider the

390 maturity of each of the following cybersecurity properties on a scale from 1-4 (Partial, Risk

391 Informed, Repeatable, and Adaptive):

- Risk Management Process Does our organization have a cybersecurity risk management process that is functioning and repeatable?
- Integrated Risk Management Program To what extent is cybersecurity risk management
 integrated into enterprise risk management?
- External Participation To what degree is our organization (or units within the organization) sharing with and receiving cybersecurity information from outside parties?

398 Unlike some maturity models, the Implementation Tiers are not prescriptive. In other words,

399 there is no set requirement for an organization and all of its sub-organizations to operate at

- 400 Implementation Tier 4. Rather, Implementation Tiers can be used for informed trade-off
- 401 analysis, since there is a corresponding cost and risk tolerance associated with each
- 402 Implementation Tier. For example, to balance finite resources across all agency cybersecurity
- 403 considerations, it may be appropriate to operate at Implementation Tier 2 in one part of an
- 404 agency in order to afford to operate at Implementation Tier 4 elsewhere. One way that federal
- 405 agencies may apply these trade-offs is via FIPS-199 categorizations. An agency might view
- 406 FIPS-199 High Impact and High Value Asset¹⁰ (HVA) systems as appropriate for higher
- 407 Implementation Tiers. Conversely, the agency may determine that operating at a lower

408 Implementation Tier for FIPS-199 Low Impact categorized systems is acceptable.

- 409 Agencies can evaluate the Implementation Tier at which they are operating in comparison to the
- 410 desired Tier. This process may identify gaps between the current and the target Implementation
- 411 Tier, as well as steps that the organization can take to progress to a desired Tier. These gaps
- 412 indicate there is a difference between current and optimal cybersecurity risk management
- 413 behaviors. Agency Implementation Tier targets may be influenced by external requiremnts,
- 414 including OMB policies and OMB cross-agency priorities.
- 415 *Evaluate Organizational Cybersecurity*

Benefit(s):	Primary SP 800-39 Level:
• Assist agencies in critically evaluating their cybersecurity risk management behaviors and identifying opportunities for	2 – Mission/Business Processes
 improvement. Enable agencies to make informed trade-offs concerning the appropriateness of and investments in the cybersecurity of particular organizational units or systems. 	Primary Cybersecurity Framework Component: Implementation Tiers
Summary: Implementation Tiers provide agencies a basis for rationalizing cybersecurity operations across an organization. That is based on trade-off Implementation Tiers for various agency business units or specific assets	g different modes of analysis of target Gan analysis between the

Implementation Tiers for various agency business units or specific assets. Gap analysis between the current and Target Implementation Tier will reveal opportunities for prioritizing improvement investments.

¹⁰ High Value Asset as first referenced in OMB Memorandum M-16-04 and defined in M-17-09

Typical Participants: Head of Agency (Chief Executive Officer), Agency Deputy (Chief Operating Officer) Risk Executive, Chief Information Officer, Senior Information Security Officer/Chief Information Security Officer (CISO), stakeholders representing other risk management disciplines (e.g., Finance, Human Resources, Acquisition)

Primary NIST Documents: NIST Special Publication 800-39, Cybersecurity Framework

416 5. Manage the Cybersecurity Program

- 417 The Core taxonomy of cybersecurity outcomes that are captured in subcategories provides a
- 418 logical structure to organize cybersecurity operations within an agency specifically, how work
- 419 gets assigned, tracked, and measured, and how personnel empowerment and accountability is
- 420 managed.
- 421 The Cybersecurity Framework provides a way to assign cybersecurity responsibility to units or
- 422 individuals in an organization. When doing so, executives can specify tasks, responsibilities, and
- 423 authorities of the cybersecurity program and its associated strategies. This also allows executives
- 424 to empower units and individuals and to reward them appropriately. If parts of cybersecurity
- 425 operations are not performing as intended or risk is beyond set threshold levels, the
- 426 Cybersecurity Framework structure enables managers to trace and investigate the situation and to
- 427 hold relevant units and individuals accountable.
- 428 The Cybersecurity Framework provides a manageable way to apportion responsibility for
- 429 cybersecurity most importantly for the desired outcomes associated with assigned Core
- 430 Functions, Categories, or Subcategories. Since controls in SP 800-53 map to the Cybersecurity
- 431 Framework, responsibility for the corresponding controls can also be assigned to these
- 432 individuals.
- 433 When analyzing the desired cybersecurity outcomes associated with Core Categories and
- 434 Subcategories, certain outcomes may be more cost-effectively managed for the entire agency by
- 435 one unit rather than by each organizational unit separately. For example, an agency may
- 436 determine that responsibility for Subcategory PR.AC-2 "Physical access to assets is managed
- 437 and protected" is most cost-effectively made the responsibility of the Physical Security unit for
- 438 the benefit of the entire agency. Conversely, the agency may decide that responsibility for the
- 439 cybersecurity outcomes of other Subcategories is shared between business units and/or systems.
- 440 These determinations can assist federal agencies in identifying candidate common and hybrid
- 441 controls as specified in SP 800-53.
- 442 Another way for federal agencies to identify common cybersecurity controls is by identifying
- 443 common assets and business processes. Managers of various business units within agencies have
- 444 a key role in identifying high value assets and business processes. The ensuing discussions
- among the business unit managers, CISO, and other stakeholders of how to prioritize and protect
- these assets will likely indicate business units which have similar assets or business processes
- 447 and which can utilize shared services to protect these high value assets. That can logically lead to

- 448 the identification of common controls to secure assets and business processes across business
- 449 units. It also can yield significant cost savings.

450 Manage the Cybersecurity Program

 Benefit(s): Provide a way to apportion responsibility and authority for cybersecurity outcomes to business units and/or individuals using 	Primary SP 800-39 Level: 2 – Business/Mission Processes	
 the Core. Provide a way to empower, reward, and hold accountable units and individuals charged with certain cybersecurity responsibilities. Identify common controls and hybrid controls via analysis of the cybersecurity outcomes in the Core and apportion responsibility for these outcomes to business units and/or individuals. Save significant resources by identifying common controls. 	Primary Cybersecurity Framework Component: Core	
Summary: The Core taxonomy of cybersecurity outcomes in Subcategories provides a way to apportion responsibility for these cybersecurity outcomes to organizational business units or individuals. Analysis of the cybersecurity outcomes in the Cybersecurity Framework Core also can assist agencies in identifying common and hybrid controls and saving resources.		
Typical Participants: Chief Information Officer, Senior Information Security Officer/Chief Information Security Officer (CISO), Common Control Provider		
Primary NIST Documents: NIST Special Publication 800-37, Cybersecurity Framework		

452 6. Maintain a Comprehensive Understanding of Cybersecurity Risk

- 453 By aggregating cybersecurity findings, gaps and vulnerabilities into a centralized record,
- 454 agencies can gain a single view of cybersecurity risk at an aggregate level. That understanding
- 455 can better inform risk decisions. Examples include determining how a system Authorization
- 456 decision might affect the agency as a whole or how broader risk decisions might play out in a
- 457 complex and connected infrastructure. An organization-wide record of risk will also enable
- 458 consistent reporting. In some organizations, this centralized record is referred to as a "risk
- 459 register."
- 460 Agencies currently track managed vulnerabilities, vulnerability mitigation plans, and accepted
- 461 vulnerabilities on a system-by-system basis. This information is in the system Security
- 462 Authorization Package, which includes the system security plan (SSP), the security assessment
- 463 report (SAR), and the plan of action and milestones (POA&Ms)¹¹. Through these artifacts,
- 464 agencies: track planned security and privacy controls, assess the implementation of controls,
- 465 annotate weaknesses or deficiencies in security controls, identify residual vulnerabilities in the
- 466 system, and highlight mitigation plans. The information in these key documents is used by
- 467 Authorizing Officials (AO) to make risk-based Authorization decisions.
- 468 Using the Cybersecurity Framework, an organization can assemble system-level weaknesses or 469 deficiencies into an enterprise-wide understanding of cybersecurity vulnerabilities. Including

¹¹ Security Authorization artifacts and process detailed in SP 800-37rev1 Appendix F

- 470 weaknesses or deficiencies across the enterprise can provide a comprehensive understanding of
- 471 vulnerabilities and planned mitigations. This information can be viewed at the Subcategory,
- 472 Category, or Function level to provide agencies additional context before making risk decisions
- 473 and associated resource investments.
- 474 Further, aggregating essential information from SARs, POA&Ms, and SSPs enables security
- 475 Authorization decisions through continuous monitoring. Security control assessments,
- 476 remediation actions, and key updates to the SARs, POA&Ms and SSPs for the system-at-hand
- 477 can be considered in the context of the organization's aggregate risk. The risk register is also
- 478 curated using the on-going risk changes tracked through Risk Management Framework (RMF)
- 479 Monitor activities. The risk register is a tool that helps the AO understand if accepting the system
- 480 risk will drive overall risk beyond organizational tolerance. Organizing the risk register
- 481 according to the language of the Core also enables a larger group of people to participate in and
- 482 inform the Authorization decision. In particular, the understandable language of Functions and
- 483 Categories of the Core enables non-cybersecurity experts to participate.
- 484 *Maintain a Comprehensive Understanding of Cybersecurity Risk*

 Benefits): Assist federal agencies to obtain a better understanding of aggregate risk to enable RMF Authorization decisions. 	Primary SP 800-39 Level: 2 – Mission/Business Processes	
	Primary Cybersecurity Framework Component: Core	
Summary: The Cybersecurity Framework Core can help agencies to better organize the risks they		

have accepted and the risks they are working to remediate across all systems. This aggregate and comprehensive understanding of risk enables more informed and effective RMF Authorization decisions.

Typical Participants: Senior Information Security Officer/Chief Information Security Officer (CISO), Authorizing Official

Primary NIST Documents: NIST Special Publication 800-37, Cybersecurity Framework

485 7. Report Cybersecurity Risks

- 486 With the risk register structured according to the Cybersecurity Framework Core, an
- 487 organization can very efficiently generate risk reports. Reports often need to be distributed to a
- 488 variety of audiences including: business process personnel, who manage risks as a part of their
- 489 daily responsibilities; senior executives, who approve and are responsible for agency operations
- 490 and investment strategies based on risk; other internal units; and external organizations. This
- 491 means reports need to vary significantly in both transparency and detail, depending on the
- 492 recipient and report requirement. At the same time, reports need to be clear and understandable.
- 493 A standardized reporting format can assist agencies in multiple cybersecurity reporting needs

- 494 Additionally, the timeliness of reports is critical for two reasons. First, reporting needs to match
- the timeline expectations of the receiving parties. Second, reports often need to represent current
- 496 state, so the time between risk measurement and report delivery needs to be minimized.
- 497 Today, risk reporting within federal organizations is performed using a variety of technologies
- 498 and reporting formats due to different sources requesting information for different purposes and
- 499 with a high degree of variability in reporting timelines. In recent years, the Office of
- 500 Management and Budget has requested annual FISMA metrics organized using the structure of
- 501 the Cybersecurity Framework's Core. With an increasing number of federal organizations,
- 502 partners, and suppliers using the Cybersecurity Framework, it is more efficient to use the
- 503 Framework's approach to meet these multiple reporting needs.
- 504 Structuring a risk register according to the hierarchy of cybersecurity outcomes in the Core
- so allows organizations to generate reports at varying levels of detail. Specifically, relating the
- 506 hierarchy of five Functions, Categories, and Subcategories to SP 800-53 controls allows
- 507 maximum flexibility in the level of detail of a given report, and can make those reports more
- 508 useful to varied audiences. That level of detail can be achieved quickly using the Core,
- 509 minimizing time and resources invested in generating the report.

510 Report Cybersecurity Risks

Bei •	nefit(s): Provide expeditious, audience-appropriate, easy-to-understand, standardized reporting	Primary SP 800-39 Level: 2 – Mission/Business Processes
		Primary Cybersecurity Framework Component:

Summary: The Cybersecurity Framework Core provides a reporting structure and language that aligns to SP 800-53 controls. This enables easy roll-up of control status into a reporting structure that is appropriate to and understandable by a given audience.

Typical Participants: Head of Agency (Chief Executive Officer), Deputy Head of Agency (Chief Operating Officer) Risk Executive (Function), Chief Information Officer, Information Owner/Steward, Senior Information Security Officer/Chief Information Security Officer (CISO), stakeholders representing other risk management disciplines (e.g., Finance, Human Resources, Acquisition)

Primary NIST Documents: NIST Special Publication 800-37rev1, Cybersecurity Framework

- 511 8. Inform the Tailoring Process
- 512 Information systems are most valuable when their features explicitly support an organization's
- 513 mission objectives and requirements.
- 514 In the RMF, after the system is categorized based on FIPS 199/SP 800-60, organizations
- 515 leverage FIPS 200 to identify minimum security requirements associated with the system impact
- 516 level. They then use the SP 800-53 tailoring process to apply any other needed security to
- 517 address specific mission objectives, operational constraints, cybersecurity requirements, and

- 518 other organizational considerations. This process is used to customize the controls baseline for
- 519 each system.
- 520 The Cybersecurity Framework offers a mechanism for reconciling mission objectives and
- 521 cybersecurity requirements into Profiles, making them an important work product using a top-
- 522 down approach to inform the tailoring. In developing a Profile, organizations can align and de-
- 523 conflict all mission objectives and cybersecurity requirements into a singular structure according
- 524 to the taxonomy of the Core. That allows organizations to easily prioritize the cybersecurity
- 525 outcomes of the Subcategories. Since Profiles can be a reconciliation of cybersecurity
- 526 requirements and associated priorities from many sources, Profiles can be used as a concise and
- 527 important artifact for consideration when tailoring SP 800-53 initial control baselines to final
- control baselines. Specifically, considering organizational Subcategory priorities and knowing 528
- 529 the associated SP 800-53 controls may lead to precise adjustments to the initial controls baseline
- 530 in ways that best support the organizational mission.

Primary SP 800-39 Level: 3 - System	
Primary Cybersecurity Framework Component: Profile(s)	
Summary: Cybersecurity Framework Profiles enable agencies to reconcile mission objectives and cybersecurity requirements into the structure of the Cybersecurity Framework Core. This readily translates to the SP 800-53 controls that are most meaningful to the organization. Profiles can be used to tailor initial SP 800-53 baselines into final baselines, as deployed in the RMF Implementation step.	
Owner, Information Security ng other risk management	

. 531

3 Plans for an Integrated Federal Approach

- 535 Under FISMA, NIST is clearly assigned to develop and issue "standards [and guidelines] that 536 provide minimum information security requirements," and "improve the efficiency of operation
- 537 or [the effectiveness of] security of Federal information systems.¹²"
- 538 As part of those responsibilities, NIST has been leading an initiative to advance and evolve the
- 539 integrated federal approach to cybersecurity by placing an increased emphasis on risk
- 540 management. As drivers for this evolution, this initiative:
- Uses cybersecurity effectiveness, agency efficiency, and repeatable processes,
- Proposes solutions for varied and dynamic federal cybersecurity challenges,
- Identifies, validates, and integrates valuable concepts,
- Streamlines federal cybersecurity risk management standards and guidelines, and
- Relies on OMB A-130 as the primary policy requirement.
- 546 The key concepts of the Cybersecurity Framework and the federal cybersecurity uses described
- 547 in this document are intended to promote the dialog with federal agencies. This exchange will
- 548 inform near-term updates to the suite of affected NIST cybersecurity and privacy risk
- 549 management publications. Recognizing the importance of clear, timely guidance to assist federal
- agencies in carrying out their cybersecurity-related responsibilities, NIST will accelerate the
- 551 update of those documents, beginning with publication of this draft report. As a next step,
- 552 consistent with NIST's practices, federal agency feedback will be used to inform and prioritize
- these updates. NIST also may use mechanisms that are more formal in order to gain wider input.
- 554 These may include the option of issuing a Request for Comment (RFC) or a Request for
- 555 Information (RFI) for certain elements of the suite of federal standards, guidelines, and
- 556 publications. NIST will select the most effective and expeditious path forward.

¹² <u>https://www.gpo.gov/fdsys/pkg/PLAW-107publ347/pdf/PLAW-107publ347.pdf</u>.

- 557 Appendix A—Summary of NIST Risk Management Publications
- 558 This appendix describes several NIST cybersecurity risk management publications referenced
- throughout this document.

560 Brief Overview of Key Publications

- 561 NIST cybersecurity risk management (RM) standards, guidelines and other documents set out
 562 RM processes and guide continual improvement of cybersecurity. Three of these are:
- 563 The Framework for Improving Critical Infrastructure Cybersecurity (Cybersecurity
 564 Framework)
- NIST SP 800-39, Managing Information Security Risk: Organization, Mission, and
 Information System View
- NIST SP 800-37, Guide for Applying the Risk Management Framework to Federal
 Information Systems: A Security Life Cycle Approach

569 The Framework for Improving Critical Infrastructure Cybersecurity (generally referred to as the

- 570 Cybersecurity Framework) provides a flexible, repeatable and cost effective risk-based approach
- to implementing security practices. Developed initially for use by critical infrastructure (CI)
 owners and operators but now used more broadly, the Framework is based on existing standards,
- 573 guidelines, and practices. It helps an organization to better understand, manage, and reduce its
- 574 cybersecurity risks and can assist in determining which activities are most important to assure
- 575 critical operations and service delivery. In turn, that will help to prioritize investments and
- 576 maximize the impact of each dollar spent on cybersecurity. By providing a common language to
- address cybersecurity risk management, it is especially helpful in communicating inside and
- 578 outside the organization. That includes improving communications, awareness, and
- 579 understanding between and among IT, planning, and operating units, as well as senior
- 580 executives. Organizations also can readily use the Framework to communicate the current or
- 581 desired cybersecurity posture between a buyer or supplier.
- 582 NIST SP 800-39, Managing Information Security Risk: Organization, Mission, and Information
- 583 *System View*, describes a process to manage cybersecurity risk. The process details individual
- steps to Frame, Assess, Respond, and Monitor cybersecurity risk, in alignment with ISO 31000,
- 585 31010, 27001, and 27005. The process is supported by descriptions of key high-level
- 586 cybersecurity risk management roles and responsibilities. Similar to the Cybersecurity
- 587 Framework, SP 800-39 defines cybersecurity risk management at enterprise, business process,
- 588 and system levels. The publication is foundational for coordinating those multiple levels of
- 589 personnel to manage cybersecurity risk.
- 590 NIST SP 800-37, Guide for Applying the Risk Management Framework to Federal Information
- 591 Systems: A Security Life Cycle Approach, details a process to provision secure systems. The six-
- 592 step Risk Management Framework (RMF) coordinates inter-related risk management standards
- 593 and guidelines to provision appropriate security controls for a given system. The process shows
- 594 detailed steps and substeps to implement, authorize, and manage system security controls. The

595 RMF utilizes the SP 800-39 roles to coordinate multiple Levels of personnel to provision secure596 systems.

597 **Preliminary Guidance Analysis**

- 598 As displayed in Figure 1, the requirements reconciliation process is critical for managing
- 599 cybersecurity risk. Many cybersecurity requirements originate from mission objectives, laws,
- 600 regulation, and policy. These must be aligned and deconflicted so that organizational
- 601 cybersecurity dependencies become apparent. The requirements are then integrated into
- 602 organizational cybersecurity risk management strategy and supportive activities. Those same
- 603 requirements inform decision making about provisioning secure systems. Finally, provisioning
- 604 secure systems is a foundational component to managing cybersecurity risk.



606 607

605

608 Basis for Document Alignment

- 609 The complex relationships among organizational missions, mission/business processes, and the
- 610 systems supporting those missions/processes require an integrated view for managing risk. NIST
- 611 SP 800-39 provides guidance for an integrated, organization-wide program for managing
- 612 information security risk. To integrate the risk management process throughout the organization,

- 613 three levels of risk management are defined: (i) *organization*; (ii) *mission/business processes*;
- 614 and (iii) system. Figure 2 illustrates the organization-wide multi-level risk management
- 615 structure.



Figure 2: Special Publication 800-39 Multi-Level Risk Management

- 618 The three respective levels of cybersecurity risk management described in the Cybersecurity
- 619 Framework and SP 800-39 are equivalent. The SP 800-39 Levels and roles are referenced
- 620 throughout the SP 800-37. The equivalence of the Cybersecurity Framework and SP 800-39
- organizational levels, and the current alignment of SP 800-37 with the SP 800-39 Levels, help to
- 622 illustrate the alignment of organizational levels across all three RM publications.
- 623 Additionally, the SP 800-39 provides process and roles for cybersecurity risk management. The
- 624 Cybersecurity Framework provides a structure for organizing cybersecurity risk management
- 625 through activities like reconciling cybersecurity requirements.

626 NIST Risk Management Framework

- 627 The organization-wide risk management process of SP 800-39 is central to administering the
- 628 RMF's six-step process in alignment with business/mission objectives and architectural
- 629 considerations, as shown in Figure 3.



631

Figure 3: Cybersecurity Risk Management Framework described in NIST SP 800-37

632 The RMF provides a method of coordinating the inter-related risk management standards and633 guidelines described below:

- 634 Federal Information Processing Standards (FIPS) Publication 199, Standards for • 635 Security Categorization of Federal Information and Information Systems, is a standard 636 for categorizing information and systems based on the potential impact to an 637 organization and its ability to accomplish its mission, protect assets, fulfill its legal 638 responsibilities, and maintain day-to-day functions. FIPS Publication 199 requires 639 federal agencies to categorize their systems as low-impact, moderate-impact, or high-640 impact for the security objectives of confidentiality, integrity, and availability. Federal 641 agencies use Special Publication 800-60, Guide for Mapping Types of Information 642 and Information Systems to Security Categories, to identify all information types 643 processed, stored, or transmitted by these systems. Each identified information type has 644 an impact value (low, moderate, or high) assigned for each of the security objectives of 645 confidentiality, integrity, and availability.
- FIPS Publication 200, *Minimum Security Requirements for Federal Information and Information Systems*, specifies (i) minimum security requirements for information and
 systems supporting executive agencies of the federal government and (ii) a risk-based
 process for selecting the security controls necessary to satisfy the minimum security

- requirements. This standard promotes the development, implementation, and operation
 of more secure systems within the federal government by establishing minimal levels of
 due diligence and facilitates a more consistent, comparable, and repeatable approach for
 selecting and specifying security controls for systems.
- 654 SP 800-53, Security and Privacy Controls for Federal Information Systems and • 655 **Organizations**, provides a comprehensive catalog of security and privacy controls and a 656 process for selecting controls to protect organizational operations, assets, individuals, 657 and other organizations from a diverse set of threats. The controls are customizable and 658 implemented as part of an organization-wide process to manage information security and 659 privacy risk. SP 800-53 also provides a methodology to develop specialized sets of 660 controls, or overlays, tailored for specific types of mission/business functions, 661 technologies, or environments of operation. SP 800-53A, Guide for Assessing the 662 Security Controls in Federal Information Systems and Organizations, provides a set of
- 663 procedures for conducting assessments of the information security and privacy controls
 664 in SP 800-53.
- 665 SP 800-37, Guide for Applying the Risk Management Framework to Federal • 666 *Information Systems*, provides guidelines for applying the Risk Management 667 Framework (RMF) to federal systems. The RMF promotes the concept of near real-time risk management and ongoing system authorization through the implementation of 668 669 robust continuous monitoring processes. It provides senior leaders the information to 670 make risk-based decisions for their systems, integrating information security into enterprise architecture and the system development lifecycle. The document describes 671 672 how to apply the RMF to systems through a six-step process, including:
- (i) the categorization of information and systems;
- 674 (ii) the selection of controls;
- 675 (iii) the implementation of controls;
- 676 (iv) the assessment of control effectiveness;
- 677 (v) the authorization of the system; and
- 678 (vi) ongoing monitoring of controls and the security state of the system.
- SP 800-137, Information Security Continuous Monitoring for Federal Information Systems and Organizations, supports the ongoing monitoring of security controls and the security state of systems. 800-137 provides guidance on developing an agency-wide information security continuous monitoring (ISCM) strategy and implementing an ISCM program. An ISCM program assists federal agencies in making informed risk management decisions by providing ongoing awareness of threats, vulnerabilities, and security control effectiveness.
- 686

- 687 SP 800-39, Managing Information Security Risk, provides guidance for an integrated, • 688 organization-wide program for managing information security risk resulting from the 689 operation and use of federal systems. The publication describes a multi-level approach to 690 risk management and applying risk management concepts across an organization. The 691 approach includes three distinct organizational levels¹³: the organization level; the 692 mission/business process level; and the system level. The application of risk 693 management processes among these levels is described in four key steps: "Framing Risk," "Assessing Risk," "Responding to Risk," and "Monitoring Risk." The risk 694 695 management process is carried out seamlessly across the three levels, with the overall 696 objective of continuous improvement in the organization's risk-related activities and 697 effective communication within and across the three levels.
- 698 SP 800-30, Guide for Conducting Risk Assessments, provides guidance for conducting • 699 risk assessments of federal systems and organizations. This document provides guidance 700 for carrying out each of the steps in the risk assessment process and how risk 701 assessments and other organizational risk management processes complement and 702 inform each other. SP 800-30 also provides guidance to organizations on identifying 703 specific risk factors to monitor on an ongoing basis. These monitoring activities enable 704 organizations to determine whether risks have increased to unacceptable levels and to 705 implement appropriate risk responses.
- Federal agencies use the RMF to "develop, document, and implement an agency-wide program
 to improve the security of its information and systems that support the operations and assets of
 the agency.[15]"
- 709 **The Cybersecurity Framework**

710 The three primary components of the Cybersecurity Framework are the **Core**, **Implementation**

- 711 **Tiers**, and **Profiles**.
- 712 One of the central features of the Cybersecurity Framework is its ability to translate highly
- technical and specialized cybersecurity language to a standardized language that experts outside
- of cybersecurity can understand. This allows a larger team of experts to participate in
- 715 cybersecurity risk management dialogs and to incorporate considerations of cybersecurity more
- broadly as part of how an organization manages its risks . The Cybersecurity Framework Core
- 717 is the structure that enables that translation. Specifically, it provides a set of specific
- 718 cybersecurity outcomes and reference examples of guidance to achieve those outcomes. The
- 719 Core is not a checklist of actions to perform; rather, it presents key cybersecurity outcomes
- identified by industry as helpful in managing cybersecurity risk. The Core itself is composed of
- four elements: Functions, Categories, Subcategories, and Informative References.

¹³ SP 800-39 uses the term "Tier." To avoid confusion between the Cybersecurity Framework "Implementation Tiers" and the SP 800-39 organizational Tiers are referred to as "Levels" in this document.

- 722 The Cybersecurity Framework *Functions* Identify, Protect, Detect, Respond, and Recover –
- provide a high level risk management vocabulary that is meaningful to cybersecurity experts and
- accessible to non-cybersecurity experts. For this reason, the Functions are applicable to both
- cybersecurity risk management and enterprise risk management, where cybersecurity is
- considered along with other organizational concerns. As illustrated in the Figure 4, the "bow tie"
- risk diagram,¹⁴ the five Functions also balance prevention and reaction, including preparatory
- activities to enable the best possible outcome from that reaction. This balance allows Functions
- to act as a high level expression of risk management strategy and structure for risk assessment.



Figure 4: Balancing Organizational Focus with Cybersecurity Framework Functions

732 While Functions are often depicted linearly, the outcomes and dependencies associated with each

Function can be iterative and often non-sequential. For example, continuous process

improvements and lessons learned from the Respond and Recover Functions can inform the

735 Protect Function. These data may be coupled with new best practices and information sharing

from other organizations that also inform federal agency considerations for continuous process

- 737 improvement in the Prevent Function.
- 738 The rest of the Cybersecurity Framework Core is subordinate to the Functions, and is composed
- of Categories, Subcategories, and Informative References. The Core hierarchy depicted in Figure
- 5 ensures a frame of reference. This greatly enriches the context of cybersecurity conversations
- or documents.

¹⁴ Bow tie diagrams are commonly used to represent all hazards, and proactive and reactive measures to address those hazards. This type of visualization may be helpful when considering cybersecurity along side of other enterprise concerns.

SN	identify D	CATEGORIES	SUBCATEGORIES	INFORMATIVE REFERENCES
INCTIO	protect PR	CATEGORIES	SUBCATEGORIES	INFORMATIVE REFERENCES
ORK FI	detect DE	CATEGORIES	SUBCATEGORIES	INFORMATIVE REFERENCES
AMEW	respond RS	CATEGORIES	SUBCATEGORIES	INFORMATIVE REFERENCES
FR	recover RC	CATEGORIES	SUBCATEGORIES	INFORMATIVE REFERENCES

743

Figure 5: The Cybersecurity Framework Core

- 744 *Categories* are the subdivisions of a Function into groups of cybersecurity outcomes closely tied
- to programmatic needs and particular activities. Examples of Categories include "Asset
- 746 Management," "Access Control," and "Detection Processes." *Subcategories* further divide a
- 747 Category into specific outcomes of technical and/or management activities. Each subcategory is
- supported by one or more *Informative References*, which are specific sections of standards,
- 749 guidelines, and practices that illustrate a method to achieve the outcomes described.
- 750 Using the Core taxonomy of Functions, Categories, and Subcategories, the Cybersecurity
- 751 Framework fosters communication within and among the levels of an organization. The
- 752 Cybersecurity Framework provides a common language among the representatives of various
- vinits of an organization and between organizations, including partners and suppliers. This helps
- to align a shared vision of security outcomes.
- Another key feature of the Cybersecurity Framework is the qualitative measurement of
- 756 organizational risk practices or behaviors. This allows organizations to identify their desirable
- behaviors, measure current behaviors, determine gaps, and work to improve.
- 758 The Cybersecurity Framework Implementation Tiers provide a method for organizations to
- view cybersecurity risk behaviors and the processes for managing risk. The Implementation
- 760 Tiers range from Partial (Tier 1) to Adaptive (Tier 4) and describe an increasing degree of rigor
- and sophistication in cybersecurity risk management practices. They also describe the extent to
- which cybersecurity risk management is informed by business needs and is integrated into an
- organization's overall risk management practices. The Cybersecurity Framework characterizes
- three distinct cybersecurity risk management practices:

- *Risk Management Process* a reflection of cybersecurity risk management within an organization.
- *Integrated Risk Management Program* the consideration of cybersecurity alongside of other organizational concerns.
- *External Participation* The bi-directional flow and consideration of information to
 better organizational Risk Management Process and Integrated Risk Management
 Program, as well as the Risk Management Processes and Integrated Risk Management
 Programs of other organizations.
- 773 While organizations identified as Implementation Tier 1 (Partial) are encouraged to consider
- 774 moving toward Implementation Tier 2 or greater, *Implementation Tiers do not represent maturity*
- 775 *levels*. Progression to higher Implementation Tiers is encouraged when the reduction in
- cybersecurity risk is deemed to be appropriate and cost-effective.
- 777 Cybersecurity Framework Profiles can be used to describe the current state and/or the desired
- target state of specific cybersecurity activities. They enable users to draw upon the Framework
- 779 Core outcomes, while supporting ways to customize those outcomes to organization-specific
- 780 missions, regulatory requirements, and operating environments. Profiles support
- 781 business/mission requirements and aid in communicating risk within and between organizations.
- 782 *Current Profiles* indicate the cybersecurity outcomes that are now being achieved. *Target*
- 783 *Profiles* indicate the outcomes needed to achieve the desired cybersecurity risk management
- 784 goals.
- 785 Comparison of Current and Target Profiles may reveal gaps and corresponding improvements
- needed to meet cybersecurity risk management objectives. The organization's business needs and
- risk management processes drive a mitigation priority for gaps. This risk-based approach enables
- an organization to estimate resources needed (e.g., staffing, funding) to set cybersecurity goals
- that can be achieved in a cost-effective, prioritized manner.
- 790 Figure 6 depicts Business/Process personnel within an organization evaluating Profile gaps,
- 791 prioritizing the sequence of gap mitigation, determining mitigation resources, and coordinating
- 792 mitigation with Implementation/Operations level personnel. In all instances, the central artifacts
- and work products are Profiles.

Risk Management



796 Appendix B—Acronyms

797 Selected acronyms and abbreviations used in this paper are defined below.

798

AO	Authorizing Official
CI	Critical Infrastructure
CISO	Chief Information Security Officer
EO	Executive Order
FIPS	Federal Information Processing Standards
FISMA	Federal Information Security Management Act of 2002, as amended
HIPAA	Health Insurance Portability and Accountability Act
HVA	High Value Asset
ISCM	Information Security Continuous Monitoring
ISO	International Organization for Standardization
ITL	Information Technology Laboratory
NIST	National Institute of Standards and Technology
OMB	Office of Management and Budget
POA&M	Plan of Action and Milestones
RFC	Request for Comment
RFI	Request for Information
RMF	Risk Management Framework
SAR	Security Assessment Report
SP	Special Publication
SSP	System Security Plan

800	Appendix C—Glossary	
	Agency	See Executive Agency
	Chief Information Officer	Agency official responsible for:
	[PL 104-106, Sec. 5125(b)]	(i) Providing advice and other assistance to the head of the executive agency and other senior management personnel of the agency to ensure that information technology is acquired and information resources are managed in a manner that is consistent with laws, Executive Orders, directives, policies, regulations, and priorities established by the head of the agency;
		(ii) Developing, maintaining, and facilitating the implementation of a sound and integrated information technology architecture for the agency; and
		(iii) Promoting the effective and efficient design and operation of all major information resources management processes for the agency, including improvements to work processes of the agency.
	Chief Information Security Officer	See Senior Agency Information Security Officer
	Common Control [NIST SP 800-37]	A security control that is inherited by one or more organizational information systems. See <i>Security Control Inheritance</i> .
	Common Control Provider [NIST SP 800-37]	An organizational official responsible for the development, implementation, assessment, and monitoring of common controls (i.e., security controls inherited by information systems).
	Cybersecurity [CNSSI 4009]	The ability to protect or defend the use of cyberspace from cyber attacks.
	Enterprise [CNSSI 4009]	An organization with a defined mission/goal and a defined boundary, using information systems to execute that mission, and with responsibility for managing its own risks and performance. An enterprise may consist of all or some of the following business aspects: acquisition, program management, financial management (e.g., budgets), human resources, security, and information systems, information and mission management. See <i>Organization</i> .
	Executive Agency [41 U.S.C., Sec. 403]	An executive department specified in 5 United States Code (U.S.C.), Sec. 101; a military department specified in 5 U.S.C., Sec. 102; an independent establishment as defined in 5 U.S.C., Sec. 104(1); and a wholly owned government corporation fully subject to the provisions of 31 U.S.C., Chapter 91.

DRAFT NISTIR 8170

Federal Agency	See Executive Agency
Federal Information System [40 U.S.C., Sec. 11331]	An information system used or operated by an executive agency, by a contractor of an executive agency, or by another organization on behalf of an executive agency.
High Value Asset [OMB M-17-09]	Those assets, federal information systems, information, and data for which an unauthorized access, use, disclosure, disruption, modification, or destruction could cause a significant impact to the United States' national security interests, foreign relations, economy – or to the public confidence, civil liberties, or public health and safety of the American people.
Hybrid Security Control [NIST SP 800-53]	A security control that is implemented in an information system in part as a common control and in part as a system- specific control. See <i>Common Control</i> and <i>System-Specific</i> <i>Security Control</i> .
Information [CNSSI 4009] [FIPS 199]	Any communication or representation of knowledge such as facts, data, or opinions in any medium or form, including textual, numerical, graphic, cartographic, narrative, or audiovisual.
	An instance of an information type.
Information Security [44 U.S.C., Sec 3541]	The protection of information and information systems from unauthorized access, use, disclosure, disruption, modification, or destruction in order to provide confidentiality, integrity, and availability.
Information System [44 U.S.C., Sec 3502]	A discrete set of information resources organized for the collection, processing, maintenance, use, sharing, dissemination, or disposition of information.
Information System Security Officer	Individual assigned responsibility by the senior agency information security officer, authorizing official, management official, or information system owner for ensuring that the appropriate operational security posture is maintained for an information system or program.

Information Technology [40 U.S.C., Sec. 1401]	Any equipment or interconnected system or subsystem of equipment that is used in the automatic acquisition, storage, manipulation, management, movement, control, display, switching, interchange, transmission, or reception of data or information by the executive agency. For purposes of the preceding sentence, equipment is used by an executive agency if the equipment is used by the executive agency directly or is used by a contractor under a contract with the executive agency which: (i) requires the use of such equipment; or (ii) requires the use, to a significant extent, of such equipment in the performance of a service or the furnishing of a product. The term information technology includes computers, ancillary equipment, software, firmware, and similar procedures, services (including support services), and related resources.
Information Type [FIPS 199]	A specific category of information (e.g., privacy, medical, proprietary, financial, investigative, contractor sensitive, security management) defined by an organization or in some instances, by a specific law, Executive Order, directive, policy, or regulation.
Organization [FIPS 200, Adapted]	An entity of any size, complexity, or positioning within an organizational structure (e.g., a federal agency or, as appropriate, any of its operational elements). See <i>Enterprise</i> .
Plan of Action and Milestones or POA&M [OMB Memorandum 02-01]	A document that identifies tasks needing to be accomplished. It details resources required to accomplish the elements of the plan, any milestones in meeting the tasks, and scheduled completion dates for the milestones.
Risk [CNSSI 4009]	A measure of the extent to which an entity is threatened by a potential circumstance or event, and typically a function of: (i) the adverse impacts that would arise if the circumstance or event occurs; and (ii) the likelihood of occurrence. [Note: Information system-related security risks are those risks that arise from the loss of confidentiality, integrity, or availability of information or information systems and reflect the potential adverse impacts to organizational operations (including mission, functions, image, or reputation), organizational assets, individuals, other organizations, and the Nation.]

Risk Executive (Function)	An individual or group within an organization that helps to ensure that:
[CNSSI 4009]	(i) security risk -related considerations for individual information systems, to include the authorization decisions for those systems, are viewed from an organization-wide perspective with regard to the overall strategic goals and objectives of the organization in carrying out its missions and business functions; and
	(ii) managing risk from individual information systems is consistent across the organization, reflects organizational risk tolerance, and is considered along with other organizational risks affecting mission/business success.
Risk Management [CNSSI 4009, adapted]	The program and supporting processes to manage information security risk to organizational operations (including mission, functions, image, reputation), organizational assets, individuals, other organizations, and the Nation, and includes:
	(i) establishing the context for risk-related activities;
	(ii) assessing risk;
	(iii) responding to risk once determined; and (iv) monitoring risk over time.
Risk Register	A central record of current risks for a given scope or organization. Current risks are comprised of both accepted risks and risk that are have a planned mitigation path (i.e., risks to-be-eliminated as annotated in a POA&M)
Security Categorization	The process of determining the security category for information or an information system. Security categorization methodologies are described in CNSS Instruction 1253 for national security systems and in FIPS 199 for other than national security systems.
Security Control Inheritance [CNSSI 4009]	A situation in which an information system or application receives protection from security controls (or portions of security controls) that are developed, implemented, assessed, authorized, and monitored by entities other than those responsible for the system or application; entities either internal or external to the organization where the system or application resides. See <i>Common Control</i> .
Security Controls [FIPS 199, CNSSI 4009]	The management, operational, and technical controls (i.e., safeguards or countermeasures) prescribed for an information system to protect the confidentiality, integrity, and availability of the system and its information.

Security Plan [NIST SP 800-18]	Formal document that provides an overview of the security requirements for an information system or an information security program and describes the security controls in place or planned for meeting those requirements. See <i>System Security Plan</i> .
Senior Agency Information Security Officer [44 U.S.C., Sec. 3544]	Official responsible for carrying out the Chief Information Officer responsibilities under FISMA and serving as the Chief Information Officer's primary liaison to the agency's authorizing officials, information system owners, and information system security officers. [Note: Organizations subordinate to federal agencies may
	<i>Senior Information Security Officer</i> or <i>Chief Information</i> <i>Security Officer</i> to denote individuals filling positions with similar responsibilities to Senior Agency Information Security Officers.]
System	See Information System
System Security Plan [NIST SP 800-18]	Formal document that provides an overview of the security requirements for an information system and describes the security controls in place or planned for meeting those requirements.
System-Specific Security Control [NIST SP 800-37]	A security control for an information system that has not been designated as a common control or the portion of a hybrid control that is to be implemented within an information system.
Tailoring [NIST SP 800-53, CNSSI 4009]	The process by which a security control baseline is modified based on:
	(i) the application of scoping guidance;
	(ii) the specification of compensating security controls, if needed; and
	(iii) the specification of organization-defined parameters in the security controls via explicit assignment and selection statements.
Threat [CNSSI 4009]	Any circumstance or event with the potential to adversely impact organizational operations (including mission, functions, image, or reputation), organizational assets, individuals, other organizations, or the Nation through an information system via unauthorized access, destruction, disclosure, modification of information, and/or denial of service.

Appendix D-	References
[1]	Federal Information Security Modernization Act of 2014, Pub. L. 107-347 (Title III), 116 Stat 2946. <u>https://www.gpo.gov/fdsys/pkg/PLAW-113publ283/pdf/PLAW-113publ283.pdf</u>
[2]	Federal Information Security Management Act of 2002, Pub. L. 107-347 (Title III), 116 Stat 2946. <u>https://www.gpo.gov/fdsys/pkg/PLAW-107publ347/pdf/PLAW-107publ347.pdf</u> .
[3]	Joint Task Force Transformation Initiative, <i>Managing Information Security</i> <i>Risk: Organization, Mission, and Information System View</i> , NIST Special Publication (SP) 800-39, March 2011. <u>http://dx.doi.org/10.6028/NIST.SP.800-39</u>
[4]	Joint Task Force Transformation Initiative, <i>Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach</i> , NIST Special Publication (SP) 800-37 Revision 1, February 2010. <u>http://dx.doi.org/10.6028/NIST.SP.800-37r1</u>
[5]	National Institute of Standards and Technology (NIST), <i>Framework for</i> <i>Improving Critical Infrastructure Cybersecurity</i> , Version 1.0, February 12, 2014. <u>https://www.nist.gov/sites/default/files/documents/cyberframework/cybersecurity-framework-021214.pdf</u>
[6]	Executive Order no. 13636, <i>Improving Critical Infrastructure Cybersecurity</i> , DCPD-201300091, February 12, 2013. <u>http://www.gpo.gov/fdsys/pkg/FR-2013-02-19/pdf/2013-03915.pdf</u>
[7]	Cybersecurity Enhancement Act of 2014, Pub. L. 113-274. https://www.gpo.gov/fdsys/pkg/PLAW-113publ274/pdf/PLAW- 113publ274.pdf
[8]	Office of Management and Budget (OMB), <i>Fiscal Year2013 Reporting</i> <i>Instructions for the Federal Information Security Management Act and</i> <i>Agency Privacy Management</i> , OMB Memorandum 14-04, November 18, 2013. <u>https://obamawhitehouse.archives.gov/sites/default/files/omb/memoranda/20</u> 14/m-14-04.pdf
[9]	The White House, Circular A-130, <i>Managing Federal Information as a Strategic Resource</i> , July 2016. https://www.whitehouse.gov/sites/default/files/omb/assets/OMB/circulars/a1 <u>30/a130revis ed.pdf</u>
[10]	U.S. Department of Commerce, <i>Standards for Security Categorization of Federal Information and Information Systems</i> , Federal Information Processing Standards (FIPS) Publication 199, February 2004. http://dx.doi.org/10.6028/NIST.FIPS.199
[11]	K. Stine, R. Kissel, C. Barker, J. Fahlsing, J. Gulick, Guide for Mapping Types of Information and Information Systems to Security Categories, NIST

Special Publication (SP) 800-60, Revision 1, August 2008. http://dx.doi.org/10.6028/NIST.SP.800-60v1r1

- [12] U.S. Department of Commerce, *Minimum Security Requirements for Federal Information and Information Systems*, Federal Information Processing Standards (FIPS) Publication 200, March 2006. <u>http://dx.doi.org/10.6028/NIST.FIPS.200</u>
- Joint Task Force Transformation Initiative, Security and Privacy Controls for Federal Information Systems and Organizations, NIST Special Publication (SP) 800-53 Revision 4, April 2013. http://dx.doi.org/10.6028/NIST.SP.800-53r4
- [14] Joint Task Force Transformation Initiative, Assessing Security and Privacy Controls in Federal Information Systems and Organizations, NIST Special Publication (SP) 800-53A Revision 4, December 2014. http://dx.doi.org/10.6028/NIST.SP.800-53Ar4
- K. Dempsey, N. Chawla, A. Johnson, R. Johnston, A. Jones, A. Orebaugh, M. Scholl, K. Stine, *Information Security Continuous Monitoring (ISCM) for Federal Information Systems and Organizations*, NIST Special Publication (SP) 800-137, September 2011. http://dx.doi.org/10.6028/NIST.SP.800-137
- [16] Joint Task Force Transformation Initiative, *Guide for Conducting Risk Assessments*, NIST Special Publication (SP) 800-30 Revision 1, September 2012. http://dx.doi.org/10.6028/NIST.SP.800-30r1
- J. Boyens, C. Paulsen, R. Moorthy, N. Bartol, Supply Chain Risk Management Practices for Federal Information Systems and Organizations, NIST Special Publication (SP) 800-161, April 2015. http://dx.doi.org/10.6028/NIST.SP.800-161
- [18] R. Ross, P. Viscuso, G. Guissanie, K. Dempsey, M. Riddle, *Protecting Controlled Unclassified Information in Nonfederal Information Systems and Organizations*, NIST Special Publication (SP) 800-171, June 2015. <u>http://dx.doi.org/10.6028/NIST.SP.800-171</u>
- [19] International Organization for Standardization/International Electrotechnical Commission, Information technology – Security techniques – Information security management systems, ISO/IEC 27001:2013, September 2013. https://www.iso.org/standard/54534.html [accessed on 3/10/17]
- [20] Information Systems Audit and Control Association (ISACA), Control Objectives for Information and Related Technology (COBIT) version 5 [Web site], <u>https://www.isaca.org/cobit</u> [accessed on 3/10/17].
- [22] Office of Management and Budget (OMB), *Cybersecurity Strategy and Implementation Plan for the Federal Civilian Government*, OMB Memorandum 16-04, October 30, 2015. <u>https://obamawhitehouse.archives.gov/sites/default/files/omb/memoranda/20</u> <u>16/m-16-04.pdf</u>