**ACRMS™ CUI Cybersecurity Policy, Task and Report Documentation –**

**Video Link:** [**https://attendee.gotowebinar.com/recording/6388853476893323265**](https://attendee.gotowebinar.com/recording/6388853476893323265)

**ACRMS™ Overview**

The ACR 2 Cybersecurity Risk Management System™ ([ACRMS™)](https://cuicybersecuritycompliance.com/) CUI cybersecurity program provides the documentation needed to create and maintain a System Security Plan (SSP) that complies with the evolving requirements of [CMMC Level 2 (version 2.0)](https://www.acq.osd.mil/cmmc/draft.html), [DFARS 252.204-7012](https://www.acquisition.gov/dfars/part-252-solicitation-provisions-and-contract-clauses#DFARS-252.204-7012), [DFARS 252.204-7019](https://www.acquisition.gov/dfars/part-252-solicitation-provisions-and-contract-clauses#DFARS-252.204-7019) and NIST Special Publication [800-171](https://csrc.nist.gov/publications/detail/sp/800-171/rev-2/final), now (September 2022) in revision 2. The ACRMS™ program is frequently updated as regulation changes occur. This 2022 iteration includes DFARS 252.204-7019 and information on 800-171 rev 3 can be seen [here.](https://csrc.nist.gov/publications/detail/sp/800-171/rev-3/draft)

The current ACRMS™ program provides a task management and tracking system to manage the now “[allowable costs](https://federalnewsnetwork.com/reporters-notebook-jason-miller/2019/06/why-dods-decision-to-make-cybersecurity-an-allowable-cost-matters/)” of DFARS cybersecurity. While initial costs of DFARS cybersecurity may not be recoverable if DFARS 7012 compliance was previously claimed, [recurring costs](https://www.govinfo.gov/content/pkg/FR-2020-09-29/pdf/2020-21123.pdf) are explicitly recoverable as overhead costs.

The 110 NIST 800-171 cybersecurity requirements generate about 240 daily, weekly, monthly, quarterly, or annual tasks. Mandatory tasks range from daily virus updates to weekly network audits to annual incident simulations and policy updates. Even a two- or three-person firm can spend hundreds of management and IT hours on these required tasks. Recurring costs for a 25 person contractor can easily exceed $100,000/year. However, unless these mandatory tasks are tracked, documented, and billed as allowable costs they become an involuntary donation to the DoD.

Most of the 240 tasks will generate a daily, weekly, monthly, quarterly, or annual report. These signed and dated reports are stored online in our heavily encrypted Document Management Center and provide easily auditable proof of compliance with the DFARS cybersecurity requirements. Jim Goepel, a former CMMC Accreditation Body member and the CEO of Fathom Cyber, noted in an [interview](https://www.fedscoop.com/cmmc-bottleneck-c3pao-assessments-dod/) that “You have to be able to show that you **have the policies** and **that you have been living the policies**, and that last part is really tricky”.

One month of the SSP/POAM updating and recurring tasks allowable cost tracking software is included with the initial ACRMS™ license, along with CMMC/DFARS policy and requirements updating. Additional ACRMS™ software and updating support is available on an annual or month-to-month basis.

**ACRMS™ – Documenting NIST 800-171 Cybersecurity Policies and the Associated Recurring and Non-recurring Tasks**



The NIST Special Publication on “Protecting Controlled Unclassified Information in Nonfederal Systems and Organizations” currently has 110 requirements. Appendix D of NIST 800-171 divides these 110 requirements into 87 policy groups. In turn, the 87 policy groups reference more than 130 detailed, cybersecurity safety controls and control enhancements taken from NIST 800-53, “Security and Privacy Controls for Federal Information Systems and Organizations”. NIST 800-53 in turn references more than 190 other NIST Special Publications. A partial set of these additional references is shown at the right.

Experience has shown that fully documenting the 110 requirements of NIST 800-171, including an SSP, can be initially completed in less than 25 hours using the three-day semi-automated ACRMS™ Boot Camp process. This compares favorably to DOD estimates of 110-304 hours and industry experience of more than 400 hours for the documentation task alone.

For each NIST 800-171 task, ACR 2 Solutions has prepared a color-coded fill-in-the-blank “Form” that can be used to prepare a policy that meets the requirements of NIST 800-171. Of the 87 “Forms” about 1/3 are mostly technical and 2/3 are administrative, with a few objectives that could be achieved using either administrative or technical solutions.

All the “Forms” follow a similar organization. The NIST 800-171 requirements are listed in black, followed by explanatory comments in blue. The corresponding NIST 800-53 safeguards are in black, with items like “organization name” and “date” in red. The NIST 800-53 specifications are followed by suggested policy clauses taken from extensive experience with small organizations.

CMMC 1.03 safeguards are listed in green. As of November 4, 2021 these items are no longer expected to be included in the DFARS 252.204-7012. This exclusion is scheduled to be the subject of formal rulemaking in the next 24 months.

While the final regulatory status of the green CMMC items is undetermined, they continue to deserve serious consideration from a cybersecurity standpoint. For the time being, items in green are to be considered as purely voluntary. This status is pending the results of formal rulemaking and may change thereafter.  **Cybersecurity is a moving target!**

NIST 800-171A auditor questions are listed in blue following the suggested policy clauses and the signature block. After the auditor questions is a section noting the audit procedures. These are taken from the NIST 800-171A spreadsheet on the NIST webpage, [here](https://csrc.nist.gov/csrc/media/Publications/sp/800-171a/final/documents/sp800-171A-assessment-procedures.csv). A sample is shown below for CUI 3.4.4.





Being prepared for all of these audit options would be an exhausting task and the audit procedures are still being developed. In the interim, the audit questions and the potential audit objects are shown as part of each template. One or more audit objects or “reports” are recommended for preparation and listed in red. Again, an example is shown for CUI 3.4.4, below

**NIST 800-171A Assessment of Policy Effectiveness**

**3.4.4 ASSESSMENT** **OBJECTIVE**: Determine if the security impact of changes to each organizational system that processes, stores, or transmits CUI is analyzed prior to implementation.

**CUI 3.4.4 Audit Questions**: SELECT FROM: Configuration management policy; procedures addressing security impact analysis for changes to the system; configuration management plan; security impact analysis documentation; security plan; analysis tools and associated outputs; change control records; system audit logs and records; other relevant documents or records.

An example of how this audit object or report might be written by the composite small contractor site Bobby Lee Welding as shown below.

Example: Procedures addressing security impact analysis for changes to the system

Proposed system change: Bobby Lee Welding proposes to expand the design subnet from 6 workstations to 12 workstations to accommodate an influx of new business.

Potential Security Impacts:

* + - 1. Additional staff will need to be vetted and security checked.
      2. Increased bandwidth may require a larger UTM to provide secure network traffic.
      3. Additional staff will require training and can be expected to increase calculated risk scores due to potential human error.
      4. Outside network construction staff will need IT manager supervision.

Filename: CM-4 Anticipated Security Impact Report 09082023

Report Date: 09/08/2023\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Report Author: Tommy Lee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

☒   Inserting my typed signature on the line below I hereby attest that I am an authorized report author or designated representative of an authorized report author and I approve the above Report on behalf of my organization.

Typed Signature: \_\_\_\_ Tommy Lee \_\_\_\_\_

A more complete template for CUI 3.4.4 is located at the end of this document.

**Policy Creation**

Turning a “Form” into a valid policy/procedure safeguard is straight forward. Erase the word “Form” in the title. Read, understand, and erase the blue text when you are finished with it. Fill in the red text and change it to black. Modify the suggested policy clauses to meet local conditions. Compare the policy to the blue NIST 800-171 A audit questions and the green CMMC auditor guidance (now optional) at the end of the “Form” to check your work then erase the rest of the blue text when you are finished. Click-sign, date, and execute the policy. Enter policy data into the ACR2 Cybersecurity Risk Management System™ (ACRMS™).

Most policies will have associated recurring and reimbursable tasks. For example, annual training in basic cybersecurity is required for all staff handling CUI. Time spent in training would be an allowable cost. The amount of training time will vary with the number of staff. Typical tasks are listed in the “Forms” for each policy/procedure safeguard. Estimated annual labor hours are provided for typical contractors with 2, 7 or 20 staff. About 80% of small federal contractors have 20 or fewer staff. A typical task and labor estimate is shown below.

Task: “Bobby Lee Welding requires all computer system users to receive basic computer system security awareness training. This should be completed before granting access to the organization's computer system. Training should be repeated when major updates to policies or other system changes are made and repeated at least annually.”



**ACRMS™ – Documenting Completion of NIST 800-171 Cybersecurity Tasks and the Associated Reports**

There are more than 200 reports documenting completion of the tasks needed to implement and maintain the 110 requirements of NIST 800-171. Recommended task reports, like recommended policies, are included with each policy template.

Recommended policy example: The <IT Manager> reviews accounts for compliance with account management requirements <annually>. File signed and dated report in Document Management Center (DMC).

Report Example: Access Control Compliance Report

Tommy Lee has inspected access privileges for each user. No unauthorized access privileges were discovered as of 8/8/2023.

Filename: AC-2 Access Control Compliance 08082023

Report Date: 08/08/2023\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Report Author: Tommy Lee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Inserting my typed signature on the line below I hereby attest that I am an authorized report author or designated representative of an authorized official and I approve the above report on behalf of my organization.

Typed Signature: \_\_\_\_ Tommy Lee \_\_\_\_\_

Reports are typically saved as PDF documents and filed in the Document Management Center. One of the most common reports is the annual updating of the 87 policy documents. Typically 0.1 hours (6 minutes) per year is authorized for this task, but if many of these updates are done in a batch less time may be required.

To update an existing policy, browse to the Document Management Center and select the policy, as shown below.

Graphical user interface, application, table, Word

Description automatically generated

Right click on the selected document and choose the “Download” option. From your downloads list in Windows File Manager, use Microsoft Word to open the PDF.

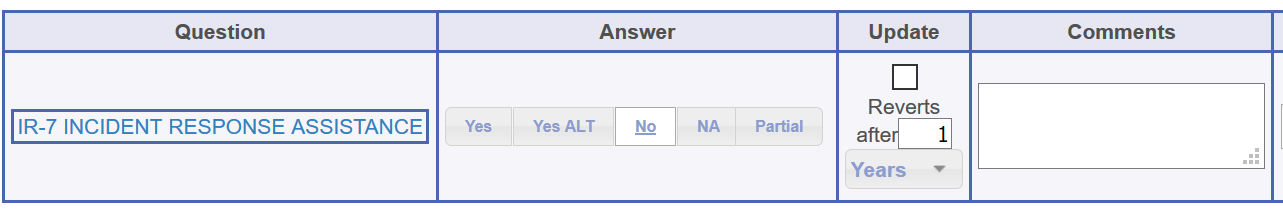
Graphical user interface, text, application

Description automatically generated

Make the necessary changes and save the updated file with a new filename containing the date of the revision, such as CUI 3.13.16 SC28 0823

**NIST Policy/Procedure Safeguard Status, Approval, and Documentation**

To be valid, an NIST policy/procedure safeguard needs to be detailed in writing, approved by an “authorizing official”, assigned a revised condition Answer, and then implemented.

All safeguards have an initial condition Answer of “No” (not fully documented, approved, and/or implemented), as shown below.

Completed and click-signed documents may have a condition Answer of “Yes” or fully implemented, “Yes ALT” i.e. satisfied using a fully documented alternative, “NA” or Not Applicable, or “Partial”, which is often the condition Answer of a click-signed technical safeguard that is now fully documented but the hardware or software is not yet installed.

Unless renewed, safeguard authorizations expire after a pre-set time, typically one year. Without modification, the safeguard condition Answer reverts to “No” after the pre-set time. This **will** negatively affect the next cybersecurity risk assessment, typically issued quarterly.

Administrative policy/procedure safeguards, which are about 2/3 of the current NIST 800-171 safeguards, can be largely implemented immediately after approval is given to them by the appropriate administrators. These safeguards can be given a condition Answer of “Yes” (fully documented, approved, and implemented) immediately after signing by an “authorizing official” and filing the policy in the Document Management Center, making it available to staff.

Technical policy/procedure safeguards will often require purchase, delivery, and installation of equipment or software. These safeguards should be given a condition Answer of “Partial” after signing and later upgraded to “Yes” after full implementation and testing.

A “Partial” condition Answer may also be conferred after any policy/procedure safeguard has been fully detailed in writing but before approval by an “authorizing official” or designee. The safeguard condition Answer may be upgraded to “Yes” after receiving an authorized signature.

The “Yes-Alt” condition Answer is for safeguards met in a non-standard way. For example, NIST 800-171 requirements 3.10.3, .4, and .5 on physical access control may be designated as “Yes-Alt” if the facility is within a building militarily secured to a “Top Secret” level. Similarly, NIST requirement 3.13.14 on control of Voice over Internet Protocol (VOIP) can be designated “NA” (Not Applicable) if there are no VOIP devices in the facility. Each “Yes-Alt” and “NA” designation requires DOD approval under DFARS 252.204-7012. Prior to such approval, the safeguards remain at a condition Answer designation of “Partial”.

While mentions of CUI policy authorizations are scattered throughout NIST 800-171, the most concise reference is in CUI 3.12.4, System Security Plan, and its associated explanatory NIST 800-53 safeguard PL-2. Quoting from PL-2, “The organization: a. Develops a security plan for the information system that provides an overview of the **security requirements** for the system is **reviewed and approved by the authorizing official** or **designated representative** prior to plan implementation, then **updates the plan** to address changes to the information system/environment of operation or problems identified during plan implementation.” **(Emphasis added)**

Based on these NIST recommendations, the following signature block is used for policy/ procedure safeguards during this process.

**Implementation Date:** \_\_\_\_<Date of Current Revision>\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Authorizing Official:** \_\_\_\_<Name of Authorizing Official>\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Inserting my typed signature on the line below I hereby attest that I am an authorizing official or designated representative of an authorizing official and I approve the above Policy/Procedure on behalf of my organization.**

**Typed Signature:** \_\_\_\_<Typed Name of Authorizing Official or Designee>\_\_\_\_\_\_

After click-signing the new or updated policy, copy the policy into a new document. Save the new document as a dated pdf and file it in the Document Management Center.

Browse to the ACRMS™ Manage Assessment page and update the safeguard condition Answer as appropriate, i.e. “Yes”, “Yes ALT” or “Partial”. On the safeguard line, note the applicable Policy File name. A single policy may cover up to five safeguards.

The following “**Suggested ACRMS data inputs”** “Form” is used at the end of each policy to help organize the data entry task.

**Suggested ACRMS data inputs**

**Screen shot of the ACRMS data input page**

Graphical user interface, application, Teams

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**Question** **AC-2 ACCOUNT MANAGEMENT**

**Answer AC-2:**  Yes  Yes/Alt  No  NA  Partial

**Policy File AC-2:** CUI 3.1.1 3.1.2 AC2 3 17 MoYr

**Screen shot of the ACRMS task edit page**

Tracking and documentation of hundreds of hours of mandatory recurring cybersecurity tasks is simplified using the ACRMS™ task edit page shown below.

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Several task management reports are on the reports page. The Assigned Task Report can be downloaded as an editable spreadsheet, as shown below.

Graphical user interface, text, application

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Description automatically generated



**Site Data Form**

The policy templates used in the ACRMS™ Boot Camp are based on a fictional DoD contractor called “Bobby Lee Welding”. The layout of Bobby Lee Welding or BLW is a composite of items taken from our last 50 small DoD contractors.

The following pages contain the site data form for Bobby Lee Welding. ACRMS™ Boot Camp clients will need to have their own Site Data Forms available for their Boot Camp sessions.

A picture containing text, sign, clipart

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**CUI Cybersecurity Site Data Summary**

**General Directions:** Please answer questions with whatever information is readily available. Typically, data will not be available for all questions. Do not delay the project for unavailable data but do provide as much information as can be readily obtained.

**Company Name: Bobby Lee Welding – Prototype Design and Fabrication**

**Site Name and Address: BLW Associates, 200 Wolf Road Hiram, GA**

**Point of Contact this Location: Bobby Lee**

**Contact Phone & Email: 770-381-9229, bobbylee@blw.net\_**

**Total number of employees at this site: 15**

**Total number of employees with remote access to this site: 2**

**Short Description of Business Activities:**

Bobby Lee Welding (BLW) began as a simple manual welding job shop. After upgrading to computer-controlled welding units, BLW was able to enter the more lucrative business of fabricating high precision components for DOD and aerospace applications. With the purchase of ACME Design Solutions, LLC, BLW is now able to modify and produce either single examples or small lots of high precision components.

Initial Information–Where information requested is unavailable, mark “unknown”.

1. Identify personel that will be available for onsite assistance for completing the risk management program. One person may fill multiple roles.
   1. Bobby Lee \_\_\_\_\_\_\_Compliance Officer – able to sign and adopt policies
   2. Bobby Lee \_\_\_\_\_\_\_Human Resources Manager – able to hire and train staff
   3. Bobby Lee \_\_\_\_\_\_\_Operations Manager – authorized to operate physical plant
   4. Tommy Lee \_\_\_\_\_\_IT Manager – able to install and manage data handling equipment
   5. \_\_Georgia MEP\_\_\_IT Consultant – resource for difficult technical issues
2. For this site, is a current Network Topology Diagram available, (Y). If yes, please attach. (Note: the free software program LibreOffice has a Visio clone drafting program that makes it simple to turn a pencil drawing into a useful diagram. A YouTube video detailing the process is at <https://www.youtube.com/watch?v=4laWj95PimI> )
3. List of employees:

Owner: Bobby Lee

IT Manager: Tommy Lee

Administrator: Sarah Lee

Remote workers: Brandon Lee (accountant) and Jimmie Lee (Tech Crew)

Production: Mike Evans, Matthew Evans, Luke Hunter, Chris Smith, Billy Morrison, James Tyler

Design: Cindy Wells, Johnny Hughes, Lucas Granger, George Shaw, Will George, Riley Mortar

1. Create Device Inventory of all devices connecting to the network or accessing protected information (PI) *(i.e., PCs, Smart phone, Mobile Device, etc.)* Please append Inventory to this form.
   1. How many and what type of computers or servers or other devices?

i. \_9 Windows, Win 10 workstations with Office 365

ii. \_6 Linux, welding machine controllers

iii. 0 Mac

iv. \_17 Android phones with full device encryption and Office 365

v. \_0 iOS

1. Software Summary – major software packages

MS Office

Quickbooks

AutoCad

WeldPro

1. Network Details - Are computers part of an Active Directory domain? (Y **/ N**)

7. Firewalls, including next-generations Firewalls (NGFW) and/or Intrusion detection/intrusion prevention systems (IDS, IPS)? (**Y** / N)

a. If Yes, Manufacturer / Model \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_Fortinet WiFi 50\_\_\_\_\_\_

b. If Yes, Summarize Recent experience

Number of Days in Dataset \_\_\_\_\_\_\_\_\_30\_\_\_\_\_\_

Total Number of Intrusions \_\_\_\_\_\_\_\_\_4\_\_\_\_\_\_

Total Number of Alerts \_\_\_\_\_\_\_17\_\_\_\_\_\_\_\_

Total Number of Warnings \_\_\_\_\_\_\_\_\_\_120\_\_\_\_\_

Total Number of Virus Detections \_\_\_\_\_\_\_\_\_\_3\_\_\_\_\_

8. Do you allow remote access? If so, how? (Mark all that apply)

1. \_X\_\_ Virtual Private Network (VPN)
2. \_\_\_ SSH
3. \_\_\_ Terminal server
4. \_\_\_ HTTPS
5. \_\_\_ Other

9. Cloud-based servers (Y / **N**) Manufacturer / Type \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

10. Cloud-based storage (**Y** / N) Manufacturer / Type \_\_\_\_\_\_AWS\_GovCloud\_\_

11. Cloud-based applications (Software as a Service) (**Y** / N) Manufacturer / Type \_\_\_\_\_\_\_\_\_Office 365\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

12. Staff Experience

Total Number of People with Access to Protected Information \_\_\_\_17\_\_\_\_

Total Number of People with Access and < 1 year Experience \_\_\_\_\_1\_\_\_

Diagram

Description automatically generatedNetwork Security Auditing at Bobby Lee Welding

![Diagram

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generated](data:image/jpeg;base64,/9j/4AAQSkZJRgABAQEAYABgAAD/4T5SRXhpZgAATU0AKgAAAAgABgALAAIAAAAmAAAIYgESAAMAAAABAAEAAAExAAIAAAAmAAAIiAEyAAIAAAAUAAAIrodpAAQAAAABAAAIwuocAAcAAAgMAAAAVgAAEUYc6gAAAAgAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAFdpbmRvd3MgUGhvdG8gRWRpdG9yIDEwLjAuMTAwMTEuMTYzODQAV2luZG93cyBQaG90byBFZGl0b3IgMTAuMC4xMDAxMS4xNjM4NAAyMDIyOjA5OjA3IDE0OjQwOjAxAAAGkAMAAgAAABQAABEckAQAAgAAABQAABEwkpEAAgAAAAMwMAAAkpIAAgAAAAMwMAAAoAEAAwAAAAEAAQAA6hwABwAACAwAAAkQAAAAABzqAAAACAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA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KKKACiiigD/9k=)Auditing of network and computer functions is a major part of the DFARS cybersecurity program. Security auditing for the Bobby Lee Welding computer network shown at right involves two basic tasks;

1. Perimeter monitoring using a Fortinet Unified Threat Management (UTM) device.
2. Windows™ 10 monitoring using the built in Windows™ security policy (secpol.msc) and event viewer functions (eventvwr.msc).

Perimeter monitoring is straightforward using the Fortinet reporting tools. The UTM logs attempted viruses, intrusions, warnings, and alerts. This data is used as part of the ACRMS™ auto-calculated NIST 800-30 risk assessment required as part of the DFARS 252.204-7012 System Security Plan (SSP).

To set a security policy on a windows 10 machine click Windows™ key + R and enter secpol.msc. Clicking on “Local Policies” brings up a large number of options, as shown below. Audit Policy gives useful information about various events and functions.

Graphical user interface, text, application, email

Description automatically generated

Periodic review of the audited policies is best done using the built-in Windows 10 Event Viewer. Click on Windows™ + R and enter eventvwr.msc.

Graphical user interface, text, application, email

Description automatically generated

Open the “Windows Logs” tab as shown below.

Graphical user interface

Description automatically generated

Typically the security logs and application logs will be of most interest.

Graphical user interface

Description automatically generated with medium confidence

**Typical Policy Example**

**NIST 800-171 CUI Cybersecurity Policy and Procedure Form 3.4.4**

**3.4.4** Analyze the security impact of changes prior to implementation.

**3.4.4 Self-Assessment Workbook Questions**

1. Are changes that affect system security requirements tested prior to implementation?
2. Is testing the effectiveness of the changes performed?
3. Are only those changes that continue to meet compliance requirements approved and implemented?
4. Are configuration changes tested, validated, and documented before installing them on the operational system?
5. Has testing been ensured to not interfere with system operations?

<Organization Name> <Date of Current Revision>

**NIST 800-53 Safeguard CM-4**

**CM-4: IMPACT ANALYSIS**

Analyze changes to the system to determine potential security and privacy impacts prior to change implementation.

Supplemental guidance: Prior to change implementation, and as part of the change approval process, the organization analyzes changes to the information system for potential security impacts. After the information system is changed (including upgrades and modifications), the organization checks the security features to verify that the features are still functioning properly.

**Suggested Policy Clauses:**

1. Prior to changes in the information system, the <IT Manager> shall prepare a report for the <Compliance Officer> on the anticipated security impact of any changes to the configuration of the information system.
2. After changes to the information system, testing to the operational system shall be done to check that the anticipated security impact did occur.

**Implementation Date:** \_\_\_\_<Date of Current Revision>\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Authorizing Official:** \_\_\_\_<Name of Authorizing Official>\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

**Inserting my typed signature on the line below I hereby attest that I am an authorizing official or designated representative of an authorizing official and I approve the above Policy/Procedure on behalf of my organization.**

**Typed Signature:** \_\_\_\_<Typed Name of Authorizing Official or Designee>\_\_\_\_\_\_

(Editor’s note: The auditor assessment and the CMMC questions are below. Confirm that your policy meets these.)

**NIST 800-171A Assessment of Policy Effectiveness**

**3.4.4 ASSESSMENT** **OBJECTIVE**: Determine if the security impact of changes to each organizational system that processes, stores, or transmits CUI is analyzed prior to implementation.

**CUI 3.4.4 Audit Questions**: SELECT FROM: Configuration management policy; procedures addressing security impact analysis for changes to the system; configuration management plan; security impact analysis documentation; security plan; analysis tools and associated outputs; change control records; system audit logs and records; other relevant documents or records.

**CMMC Level 3 Assessment Guide**

* Are configuration changes tested, validated, and documented before installing them on the operational system?

**Suggested ACRMS data inputs**

**Screen shot of the ACRMS data input page**

Graphical user interface, application, Teams

Description automatically generated

**Question** **CM-4: SECURITY IMPACT ANALYSIS**

**Answer CM-4:**  Yes  Yes/Alt  No  NA  Partial

**Policy File CM-4:** CUI 3.4.4 CM4 MoYr

**Screen shot of front of ACRMS task edit page**

**Graphical user interface, text, email

Description automatically generated**

Prior to changes in the information system, the <IT Manager> shall prepare a report for the <Compliance Officer> on the anticipated security impact of any changes to the configuration of the information system. File signed and dated report in Document Management Center (DMC).

Report Example: Procedures addressing security impact analysis for changes to the system

Proposed system change: Bobby Lee Welding proposes to expand the design subnet from 6 workstations to 12 workstations to accommodate an influx of new business.

Potential Security Impacts:

* + - 1. Additional staff will need to be vetted and security checked (see CUI 3.9.1, 3.9.2).
      2. Increased bandwidth may require a larger UTM to provide secure network traffic.
      3. Additional staff will require training and can be expected to increase calculated risk scores due to human error (see CUI 3.2.1, 3.2.2 and 3.11.1).
      4. Outside network construction staff will need IT manager supervision (see CUI 3.7.3, 3.7.4).

Filename: CM-4 Anticipated Security Impact Report 09012023

Report Date: 09/01/2023\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Report Author: Tommy Lee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

☒   Inserting my typed signature on the line below I hereby attest that I am an authorized report author or designated representative of an authorized report author and I approve the above Report on behalf of my organization.

Typed Signature: \_\_\_\_ Tommy Lee \_\_\_\_\_



Estimated hours: 12

After changes to the information system, testing to the operational system shall be done to check that the anticipated security impact did occur by the <IT Manager>. File signed and dated report in Document Management Center (DMC).

Report Example: Network Changes - Security Impact Review

Following system and network modifications an updated ACRMS™ risk assessment will be conducted (see CUI 3.11.1). A new System Security Plan (see CUI 3.12.1, 2, 3, 4) and will be written to reflect the changes in the information system network (CUI 3.4.1, 3.4.2).

Filename: CM-4 Network Changes Security Impact Review 09012023

Report Date: 09/01/2023\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Report Author: Tommy Lee \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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Typed Signature: \_\_\_\_ Tommy Lee \_\_\_\_\_



Estimated hours: 12

The <Compliance Officer> reviews this policy and updates annually or as needed. File signed and dated policy in Document Management Center (DMC).

Example of updated Policy when no changes are made:

Download existing policy by opening the Document Management Center and right clicking on the file name and selecting download – see screen below.

Graphical user interface, application

Description automatically generated

Open Downloaded file in Microsoft Word. Update as shown below and save as PDF

Implementation Date: \_\_\_09/01/2023\_\_\_\_\_(new date)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Authorizing Official: \_Bobby Lee\_\_\_(no change)\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Inserting my typed signature on the line below I hereby attest that I am an authorizing official or designated representative of an authorizing official and I approve the above Policy/Procedure on behalf of my organization.

Typed Signature: \_\_\_Bobby Lee\_\_\_\_\_\_\_(no change)\_\_



Estimated hours: 0.10