# Reusable Component Library System Security Plan

# NIST SP 800-53 Revision 4

## AC: Access Control

### AC-1: Access Control Policy And Procedures

The organization:  
 a. Develops, documents, and disseminates to [Assignment: organization-defined  
personnel or roles]:  
 1. An access control policy that addresses purpose, scope, roles, responsibilities,  
management commitment, coordination among organizational entities, and compliance; and  
 2. Procedures to facilitate the implementation of the access control policy  
and associated access controls; and  
 b. Reviews and updates the current:  
 1. Access control policy [Assignment: organization-defined frequency]; and  
 2. Access control procedures [Assignment: organization-defined frequency].

**Status:** Complete

##### CivicActions

CivicActions has developed, documented and disseminated to personnel an access control policy that addresses purpose, scope, roles, responsibilities, management commitment, coordination among organizational entities, and compliance; and procedures to facilitate the implementation of the policy and associated controls. This information is maintained in the CivicActions Access Control (AC) Policy. This document can be found in the CivicActions Compliance Docs GitHub repository at <https://github.com/CivicActions/compliance-docs>.

##### Project

This is Agency common control. More data about implementation can be obtained from the Agency common control catalog.

Access control policy and procedures are documented in the The Project SSP. Access to Project operational information or system resources is limited to only authorized users, programs or processes. The Department enforces access control policies to protect the integrity of the The Project. This Department reviews and updates this policy as necessary and it has been being updated, as necessary, since April 2008.

### AC-2: Account Management

The organization:  
 a. Identifies and selects the following types of information system accounts  
to support organizational missions/business functions: [Assignment: organization-defined information system account types];  
 b. Assigns account managers for information system accounts;  
 c. Establishes conditions for group and role membership;  
 d. Specifies authorized users of the information system, group and role membership,  
and access authorizations (i.e., privileges) and other attributes (as required) for each account;  
 e. Requires approvals by [Assignment: organization-defined personnel or roles]  
for requests to create information system accounts;  
 f. Creates, enables, modifies, disables, and removes information system accounts  
in accordance with [Assignment: organization-defined procedures or conditions];  
 g. Monitors the use of information system accounts;  
 h. Notifies account managers:  
 1. When accounts are no longer required;  
 2. When users are terminated or transferred; and  
 3. When individual information system usage or need-to-know changes;  
 i. Authorizes access to the information system based on:  
 1. A valid access authorization;  
 2. Intended system usage; and  
 3. Other attributes as required by the organization or associated missions/business  
functions;  
 j. Reviews accounts for compliance with account management requirements [Assignment:  
organization-defined frequency]; and  
 k. Establishes a process for reissuing shared/group account credentials (if  
deployed) when individuals are removed from the group.

**Status:** Complete

##### AWS

The system partially inherits this control from the FedRAMP Provisional ATO granted to the AWS Cloud dated 1 May 2013 for the following: AWS account management.

#### a

##### AWS

In this architecture, the baseline AWS Identity and Access Management (IAM) groups and roles are associated with access policies to align user accounts with personnel functions related to infrastructure/platform management (e.g. Billing, Amazon EC2/VPC/Amazon RDS systems administration, I.T. auditing, etc.)

##### CivicActions

CivicActions Operations staff, in collaboration with CivicActions’ Security Office, will set up privileged accounts for the following roles:

* Developer - a user-level account that has access to application features and sanitized databases
* System Administrator - user accounts that enjoy full system administrator access

##### Ilias

Ilias provides user accounts for individuals who participate in visiting, contributing to and administering the site with the following roles: - Anonymous user – Readers of the site who either do not have an account or are not logged in. - Guest – This role has limited visibility and read permissions - User - Standard role for registered users. This role grants read access to most objects. - Administrator - This role has all permissions enabled by default.

##### Project

SSH system accounts are provided to contractors on an as-needed basis.

Access privileges are used to ensure that only authorized personnel access certain areas of the Project system. User access is controlled by the completion and submission of Project system Rules of Behavior and New User Account Request forms by the user and management. These items are completed and submitted whenever a new user requires access or an existing user requires access changes. The system administrator, based on need-to-know, assigns the proper permissions. The employee’s manager approves the access rights before the initial account is created. Finally, the system administrator implements the access rights according to the New User Account Request form. The security staff and the support contractor review accounts periodically. Accounts no longer in use are removed from the system by the system administrator.

The Project has implemented user account procedures to disable inactive user accounts after 90-days of inactivity. The Project support staff monitors all user accounts to ensure this procedure is enforced. Section 6.3, Authentication Management, of the Project SSP illustrates the exact procedures the contractor support staff follows to ensure accounts are properly managed. The Project system does not have guest or anonymous accounts.

##### SSH

Operations, in collaboration with the Security Office, will set up privileged accounts accounts for the following roles: - Developer - user level account that has access to application features and sanitized databases - System Administrator - user accounts that enjoy full system administrator (sudo) access

#### b

##### CivicActions

CivicActions’ Project Manager assigns the “administrator” role for the management of all accounts issued to internal admin roles supporting the information system. Account requests are initiated by the Project Manager by completing a ticket request and the CivicActions Operation staff manages the entire account creation process.

##### Drupal

Drupal defines a default set of roles; Anonymous, Authenticated, and Administrator, as well as providing for the creation of additional organizational-defined roles identified by The Project

##### Project

The system Owner has oversight over all permissions that the Project Manager and Operations Staff manages.

#### c

##### Project

In accordance with Project Access Control Policy, Project group membership is determined according to the individual’s position and role within the organization. A ticket request is used to request accounts and group membership. The request is authorized by the appropriate manager.

#### d

##### CivicActions

All accounts issued for application administrators and SSH are documented in CivicActions’ ticketing system. Account request tickets contain details that explain the attributes for the account including authorized users of Drupal, system infrastructure, group and role membership, and access authorizations.

##### Drupal

Drupal has a sophisticated permissions and role-based access control built-in. Each role within Drupal can only access the documents and controls for which their privilege allows.

##### Ilias

Ilias’ permissions and role-based access controls are built-in. Each role within Ilias can only access the pages and controls for which their privilege allows.

##### Project

Project user privileges vary depending on the type of user role assigned. Only users with the role of Administrator have the ability to create and modify user roles for other users.

#### e

##### CivicActions

All accounts issued for the admin management of Application or SSH access must be approved by the System Owner or Project Manager who must create an account request. The CivicActions Operations staff applies appropriate account permissions and settings based on the job role and function documented within the request ticket using processes defined by the CivicActions’ Security Office.

##### Project

The System Owner approves, and CivicActions Operations set up the initial Administrator account for Project. Subsequent client access and related approvals are managed by CivicActions Operations in collaboration with the System Owner.

#### f

##### CivicActions

CivicActions Operations staff is responsible for the following account management activities for both internal administrative users and customer accounts:

* Establishing account justification
* Activating accounts
* Modifying accounts
* Expiring accounts
* Disabling accounts
* Removing accounts

#### g

##### AWS

In this architecture, AWS CloudTrail and Amazon S3 Bucket logging are enabled, which provide the audit trail capability for the organization to monitor the use of AWS Identity and Access Management (IAM) accounts. An Amazon S3 bucket centrally contains the CloudTrail audit logs. Amazon CloudWatch Alarm is configured to send an alert when any of the following happen: - an API call is made to create, update, or delete a Network ACL/Security Group - AWS account *root user* activity is detected - multiple API actions or login attempts fail - IAM Configuration changes are detected - new IAM access key was created - changes to the CloudTrail log configuration are detected

##### CivicActions

All CivicActions systems log the usage of information accounts.

##### Drupal

Drupal monitors the usage of information accounts in the Watchdog log.

##### Ilias

Ilias monitors the usage of information accounts in a log on the server.

#### h

##### CivicActions

In accordance with the CivicActions Access Control (AC-01) Policy when an account is no longer required, the Project Manager notifies the Operations Team to immediately disable all access. Users upon reassignment, change in roles, termination, or leaving employment are initially removed from all roles and groups, effectively denying them all access to privileged accounts.

#### i

##### CivicActions

System accounts require access authorizations prior to accounts being created. The Project Manager must initiate an access request for an account to be created. CivicActions Operations staff reviews the request to ensure accuracy, including intended system usage and other attributes of the user access being requested.

##### Project

Project governs their own administrative access. Users with the Administrator roles are empowered to designate and approve Administrators.

#### j

##### CivicActions

All privileged accounts are reviewed by CivicActions Operations staff every 180 days.

##### Project

Administrators are empowered to and responsible for reviewing their own accounts and determining whether the accounts should still be authorized.

#### k

##### CivicActions

In accordance with standard security best practices and CivicActions policy, shared and reissued accounts for internal accounts of any kind are not created nor used for any purpose in any system.

### AC-3: Access Enforcement

The information system enforces approved authorizations for logical access to information and system resources in accordance with applicable access control policies.

**Status:** Complete

##### AWS

In this architecture, AWS Identify and Access Management (IAM) and Amazon Amazon S3 enforce access to the AWS infrastructure and data in Amazon S3 buckets. The baseline IAM groups and roles are associated with access policies to align user accounts with personnel functions related to infrastructure/platform management (e.g. Billing, Amazon EC2/VPC/Amazon RDS systems administration, I.T. auditing, etc.) Login/API access is restricted to those users for whom the organization has authorized and created, or federated, IAM user accounts, and assigned the appropriate IAM group and/or role memberships. Amazon S3 buckets have specific access control policies assigned to restrict access to those IAM users who are assigned the appropriate IAM roles/groups.

##### Drupal

Access control in Drupal is enforced by authentication via a unique username/password for every type of user except Anonymous user. The user’s privileges, permissions, and access are provided on the principle of least privilege. The anonymous user role has the least access to the site of all roles. The website does not allow anonymous users to register an account for themselves. Drupal Administrators are the only user roles that can create new user accounts.

##### Ilias

Access control in Ilias is enforced by authentication via Shibboleth single sing on (SSO) for every type of user except Anonymous user. The user’s privileges, permissions, and access are provided on the principle of least privilege. The anonymous user role has the least access to the site of all roles. The website does not allow anonymous users to register an account for themselves. Project Administrators, HR Managers, and Org Managers are the only roles that can create new user accounts.

##### Project

The The Project ensures that assigned authorizations for controlling access to the system is enforced in accordance with the user definitions noted in Section 1.1.1 of the Project SSP. The technical support staff ensures that access to security functions and protected information is restricted to authorized personnel. Access will be controlled with access control list used on each instance. Members of one group cannot access resources defined for other groups unless explicitly permitted.

### AC-6: Least Privilege

The organization employs the principle of least privilege, allowing only authorized accesses for users (or processes acting on behalf of users) which are necessary to accomplish assigned tasks in accordance with organizational missions and business functions.

##### SSH

SSH access is provided on a least privilege basis and analyzed on an ongoing basis, at least quarterly. Findings related to these audits of accounts are reported and reviewed by the Security Office and evaluated to determine roles that need to be revoked.

### AC-7: Unsuccessful Logon Attempts

The information system:  
 a. Enforces a limit of [Assignment: organization-defined number] consecutive  
invalid logon attempts by a user during a [Assignment: organization-defined time period]; and  
 b. Automatically [Selection: locks the account/node for an [Assignment: organization-defined  
time period]; locks the account/node until released by an administrator; delays next logon prompt according to [Assignment: organization-defined delay algorithm]] when the maximum number of unsuccessful attempts is exceeded.

**Status:** Complete

##### Project

The Project system locks out users after three unsuccessful login attempts. The information system automatically locks the account permanently, unless an administrator unlocks the account before then, when the maximum number of unsuccessful attempts (3) is exceeded.

#### a

##### Drupal

Drupal can be configured to lock an account after a specified number of invalid login attempts within a specified time period. The default for Drupal is 5 failed login attempts within six hours.

#### b

##### Drupal

Lockdown following unsuccessful attempts is configurable by Drupal administrators to conform to defined requirements. When a user exceeds the limit of invalid login attempts, their account is automatically locked for a specified time and requires administrator action to unlock the account before the lockout period expires.

### AC-8: System Use Notification

The information system:  
 a. Displays to users [Assignment: organization-defined system use notification  
message or banner] before granting access to the system that provides privacy and security notices consistent with applicable federal laws, Executive Orders, directives, policies, regulations, standards, and guidance and states that:  
 1. Users are accessing a U.S. Government information system;  
 2. Information system usage may be monitored, recorded, and subject to audit;  
 3. Unauthorized use of the information system is prohibited and subject to  
criminal and civil penalties; and  
 4. Use of the information system indicates consent to monitoring and recording;  
 b. Retains the notification message or banner on the screen until users acknowledge  
the usage conditions and take explicit actions to log on to or further access the information system; and  
 c. For publicly accessible systems:  
 1. Displays system use information [Assignment: organization-defined conditions],  
before granting further access;  
 2. Displays references, if any, to monitoring, recording, or auditing that  
are consistent with privacy accommodations for such systems that generally prohibit those activities; and  
 3. Includes a description of the authorized uses of the system.

**Status:** Partial

##### Ilias

System Use Notification is inherited from the Project.

##### Project

A warning banner ensures that all persons attempting to gain access to the system know that the system and its information are “Authorized User Only” and that attempts to illegally log on to the system could lead to criminal prosecution. The warning message displayed notifies unauthorized users that they have accessed a U.S. Government computer system and continued, unauthorized use can be punishable by fines or imprisonment. Each device logged into will display a system use notification message before the log in window is displayed. The system use notification banner will remain on the screen until the user takes an explicit action to log on to the device. The following is the notification banner displayed on all system instances:

"You are accessing a U.S. Government (USG) Information System (IS) that is provided for USG-authorized use only. By using this IS (which includes any device attached to this IS), you consent to the following conditions:

* The USG routinely intercepts and monitors communications on this IS for purposes including, but not limited to, penetration testing, COMSEC monitoring, network operations and defense, personnel misconduct (PM), law enforcement (LE), and counterintelligence (CI) investigations.
* At any time, the USG may inspect and seize data stored on this IS.
* Communications using, or data stored on, this IS are not private, are subject to routine monitoring, interception, and search, and may be disclosed or used for any USG-authorized purpose.
* This IS includes security measures (e.g., authentication and access controls) to protect USG interests – not for your personal benefit or privacy.
* Notwithstanding the above, using this IS does not constitute consent to PM, LE or CI investigative searching or monitoring of the content of privileged communications, or work product, related to personal representation or services by attorneys, psychotherapists, or clergy, and their assistants. Such communications and work product are private and confidential. See User Agreement for details."

### AC-14: Permitted Actions Without Identification Or Authentication

The organization:  
 a. Identifies [Assignment: organization-defined user actions] that can be performed  
on the information system without identification or authentication consistent with organizational missions/business functions; and  
 b. Documents and provides supporting rationale in the security plan for the  
information system, user actions not requiring identification or authentication.

**Status:** Complete

##### Ilias

The anonymous user role has the least access to the site of all roles. The website does not allow anonymous users to register an account for themselves.

##### Project

The The Project allows the general public user to read the web pages, do searches on the resource database and to review online forum information without identification and authentication for the public web site. Program and Privilege users cannot access the Project system without identification or authentication.

#### a

##### Drupal

The anonymous user role has the least access to the site of all roles. Drupal sites can be configured to allow actions identified by The Project

### AC-17: Remote Access

The organization:  
 a. Establishes and documents usage restrictions, configuration/connection requirements,  
and implementation guidance for each type of remote access allowed; and  
 b. Authorizes remote access to the information system prior to allowing such  
connections.

**Status:** Complete

##### CivicActions

The CivicActions Access Control (AC) policy defines policy for remote usage restrictions. The Project Manager or System Owner may additionally provision users according to their Access Control policies.

##### Project

The The Project permits remote access for privileged functions to support operational needs. The technical staff documents, monitors, and controls all methods of remote access to the information system including remote access for privileged functions. Privileged user access is only permitted through the use of Secure Shell (SSH) where the user will authenticate to the device through this secure channel. Virtual Private Networking (VPN) is not enabled in any form within the Project accreditation boundary.

### AC-18: Wireless Access

The organization:  
 a. Establishes usage restrictions, configuration/connection requirements, and  
implementation guidance for wireless access; and  
 b. Authorizes wireless access to the information system prior to allowing such  
connections.

**Status:** Complete

##### CivicActions

This control is not applicable. The system does not provide wireless access points.

### AC-19: Access Control For Mobile Devices

The organization:  
 a. Establishes usage restrictions, configuration requirements, connection requirements,  
and implementation guidance for organization-controlled mobile devices; and  
 b. Authorizes the connection of mobile devices to organizational information  
systems.

**Status:** Complete

##### CivicActions

This control is not applicable. The system does not maintain a facility in which mobile device access limitations are required.

### AC-20: Use Of External Information Systems

The organization establishes terms and conditions, consistent with any trust relationships established with other organizations owning, operating, and/or maintaining external information systems, allowing authorized individuals to:  
 a. Access the information system from external information systems; and  
 b. Process, store, or transmit organization-controlled information using external  
information systems.

**Status:** Complete

##### CivicActions

This control is not applicable. The system does not connect with external information systems.

### AC-22: Publicly Accessible Content

The organization:  
 a. Designates individuals authorized to post information onto a publicly accessible  
information system;  
 b. Trains authorized individuals to ensure that publicly accessible information  
does not contain nonpublic information;  
 c. Reviews the proposed content of information prior to posting onto the publicly  
accessible information system to ensure that nonpublic information is not included; and  
 d. Reviews the content on the publicly accessible information system for nonpublic  
information [Assignment: organization-defined frequency] and removes such information, if discovered.

**Status:** Complete

#### a

##### Project

The The Client grants certain Project support staff members the authority to post publicly accessible content. These individuals must complete Project system security training before being granted access to the Project and before they can post publicly accessible content within the The Project. Furthermore, each authorized individual must follow the procedures delineated within the “Using Drupal” Instruction to ensure they are following a verifiable procedure throughout the entire process. This covers the Project Discussion Lists administration areas, Project Quarterly Reporting and training tools, and Drupal Content Management systems. Public content is only edited via the Drupal Content Management System. All other content is only viewable by Project system users and protected by hardened access controls.

#### b

##### Project

It is the Project responsibility to train authorized Project individuals ensuring publicly accessible information does not contain nonpublic information.

#### c

##### Project

Authorized Project individuals review the proposed content of information prior to posting onto the publicly accessible information system to ensure that nonpublic information is not included.

Project Users have been authorized for creation of publicly accessible content with publishing authority from an Administrator role. The publishing authority ensures the information being published does not contain nonpublic information.

#### d

##### Project

Authorized Project individuals review the content on the publicly accessible information system for nonpublic information at least every 365 days and removes such information.