

Control Number	Sort	Control Family	Requirements	Supplemental Guidance	Score
AC-2	AC-2_N_00	Access Control	ACCOUNT MANAGEMENT Control: 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];	Information system account types include, for example, individual, shared, group, system, guest/anonymous, emergency, developer/manufacturer/vendor, temporary, and service. Some of the account management requirements listed above can be implemented by organizational information systems. The identification of authorized users of the information system and the specification of access privileges reflects the requirements in other security controls in the security plan. Users requiring administrative privileges on information system accounts receive additional scrutiny by appropriate organizational personnel (e.g., system owner, mission/business owner, or chief information security officer) responsible for approving such accounts and privileged access. Organizations may choose to define access privileges or other attributes by account, by type of account, or a combination of both. Other attributes required for authorizing access include, for example, restrictions on time-of-day, day-of-week, and point-of-origin. In defining other account attributes, organizations consider system-related requirements (e.g., scheduled maintenance, system upgrades) and mission/business requirements, (e.g., time zone differences, customer requirements, remote access to support travel requirements). Failure to consider these factors could affect information system availability. Temporary and emergency accounts are accounts intended for short-term use. Organizations establish temporary accounts as a part of normal account activation procedures when there is a need for short-term accounts without the demand for immediacy in account activation. Organizations establish emergency accounts in response to crisis situations and with the need for rapid account activation. Therefore, emergency account activation may bypass normal account authorization processes. Emergency and temporary accounts are not to be confused with infrequently used accounts (e.g., local logon accounts used for special tasks defined by organizations or when network resources are unavailable). Such accounts remain available and are not subject to automatic disabling or removal dates. Conditions for disabling or deactivating accounts include, for example: (i) when shared/group, emergency, or temporary accounts are no longer required; or (ii) when individuals are transferred or terminated. Some types of information system accounts may require specialized training. Related controls: AC-3, AC-4, AC-5, AC-6, AC-10, AC-17, AC-20.	N/A- Not enough information.
AC-6	AC-6_N_00	Access Control	LEAST PRIVILEGE Control: 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.	Organizations employ least privilege for specific duties and information systems. The principle of least privilege is also applied to information system processes, ensuring that the processes operate at privilege levels no higher than necessary to accomplish required organizational missions/business functions. Organizations consider the creation of additional processes, roles, and information system accounts as necessary, to achieve least privilege. Organizations also apply least privilege to the development, implementation, and operation of organizational information systems. Related controls: AC-2, AC-3, AC-5, CM-6, CM-7, PL-2.	BAD-This is not done at all.
CM-7	CM-7_N_00	Configuration Management	LEAST FUNCTIONALITY Control: The organization: a. Configures the information system to provide only essential capabilities; and b. Prohibits or restricts the use of the following functions, ports, protocols, and/or services: [Assignment: organization-defined prohibited or restricted functions, ports, protocols, and/or services].	Information systems can provide a wide variety of functions and services. Some of the functions and services, provided by default, may not be necessary to support essential organizational operations (e.g., key missions, functions). Additionally, it is sometimes convenient to provide multiple services from single information system components, but doing so increases risk over limiting the services provided by any one component. Where feasible, organizations limit component functionality to a single function per device (e.g., email servers or web servers, but not both). Organizations review functions and services provided by information systems or individual components of information systems, to determine which functions and services are candidates for elimination (e.g., Voice Over Internet Protocol, Instant Messaging, auto-execute, and file sharing). Organizations consider disabling unused or unnecessary physical and logical ports/protocols (e.g., Universal Serial Bus, File Transfer Protocol, and Hyper Text Transfer Protocol) on information systems to prevent unauthorized connection of devices, unauthorized transfer of information, or unauthorized tunneling. Organizations can utilize network scanning tools, intrusion detection and prevention systems, and end-point protections such as firewalls and host-based intrusion detection systems to identify and prevent the use of prohibited functions, ports, protocols, and services. Related controls: AC-6, CM-2, RA-5, SA-5, SC-7.	N/A- Not enough information.
CP-6	CP-6_N_00	Contingency Planning	ALTERNATE STORAGE SITE Control: The organization: a. Establishes an alternate storage site including necessary agreements to permit the storage and retrieval of information system backup information; and		BAD-This is not done at all.
CP-7	CP-7_N_00	Contingency Planning	ALTERNATE PROCESSING SITE Control: The organization: a. Establishes an alternate processing site including necessary agreements to permit the transfer and resumption of [Assignment: organization-defined information system operations] for essential missions/business functions within [Assignment: organization-defined time period consistent with recovery time and recovery point objectives] when the primary processing capabilities are unavailable;	Alternate processing sites are sites that are geographically distinct from primary processing sites. An alternate processing site provides processing capability in the event that the primary processing site is not available. Items covered by alternate processing site agreements include, for example, environmental conditions at alternate sites, access rules, physical and environmental protection requirements, and coordination for the transfer/assignment of personnel. Requirements are specifically allocated to alternate processing sites that reflect the requirements in contingency plans to maintain essential missions/business functions despite disruption, compromise, or failure in non-organizational information systems. Related controls: CP-2, CP-6, CP-8, CP-9, CP-10, MA-6. Organizational users include employees or individuals that organizations deem to have equivalent status of employees (e.g., contractors, guest researchers). This control applies to all accesses other than: (i) accesses that are explicitly identified and documented in AC-14; and (ii) accesses that occur through authorized use of group authenticators without individual authentication. Organizations may require unique identification of individuals in group accounts (e.g., shared privilege accounts) or for detailed accountability of individual activity. Organizations employ passwords, tokens, or biometrics to authenticate user identities, or in the case multifactor authentication, or some combination thereof. Access to organizational information systems is defined as either local access or network access. Local access is any access to organizational information systems by users (or processes acting on behalf of users) where such access is obtained by direct connections without the use of networks. Network access is access to organizational information systems by users (or processes acting on behalf of users) where such access is obtained through network connections (i.e., nonlocal accesses). Remote access is a type of network access that involves communication through external networks (e.g., the Internet). Internal networks include local area networks and wide area networks. In addition, the use of encrypted virtual private networks (VPNs) for network connections between organization-controlled endpoints and non-organization controlled endpoints may be treated as internal networks from the perspective of protecting the confidentiality and integrity of information traversing the network. Organizations can satisfy the identification and authentication requirements in this control by complying with the requirements in Homeland Security Presidential Directive 12 consistent with the specific organizational implementation plans. Multifactor authentication requires the use of two or more different factors to achieve authentication. The factors are defined as: (i) something you know (e.g., password, personal identification number [PIN]); (ii) something you have (e.g., cryptographic identification device, token); or (iii) something you are (e.g., biometric). Multifactor solutions that require devices separate from information systems gaining access include, for example, hardware tokens providing time-based or challenge-response authenticators and smart cards such as the U.S. Government Personal Identity Verification card and the DoD common access card. In addition to identifying and authenticating users at the information system level (i.e., at logon), organizations also	BAD-This is not done at all.
IA-2	IA-2_N_00	Identification and Authentication	IDENTIFICATION AND AUTHENTICATION (ORGANIZATIONAL USERS) Control: The information system uniquely identifies and authenticates organizational users (or processes acting on behalf of organizational users).		GOOD-This this is done in some capacity.

PE-3	PE-3,N_00	Physical and Environmental Protection	<p>PHYSICAL ACCESS CONTROL</p> <p>Control: The organization:</p> <p>a. Enforces physical access authorizations at [Assignment: organization-defined entry/exit points to the facility where the information system resides] by:</p> <p>1. Verifying individual access authorizations before granting access to the facility; and</p> <p>2. Controlling ingress/egress to the facility using [Selection (one or more): (Assignment: organization-defined physical access control systems/devices); guards];</p> <p>b. Maintains physical access audit logs for [Assignment: organization-defined entry/exit points];</p> <p>c. Provides [Assignment: organization-defined security safeguards] to control access to areas within the facility officially designated as publicly accessible;</p> <p>d. Escorts visitors and monitors visitor activity [Assignment: organization-defined circumstances requiring visitor escorts and monitoring];</p> <p>e. Secures keys, combinations, and other physical access devices;</p> <p>f. Inventories [Assignment: organization-defined physical access devices] every [Assignment: organization-defined frequency]; and</p> <p>g. Changes combinations and keys [Assignment: organization-defined frequency] and/or when keys are lost, combinations are compromised, or individuals are transferred or terminated.</p>	<p>This control applies to organizational employees and visitors. Individuals (e.g., employees, contractors, and others) with permanent physical access authorization credentials are not considered visitors. Organizations determine the types of facility guards needed including, for example, professional physical security staff or other personnel such as administrative staff or information system users. Physical access devices include, for example, keys, locks, combinations, and card readers. Safeguards for publicly accessible areas within organizational facilities include, for example, cameras, monitoring by guards, and isolating selected information systems and/or system components in secured areas. Physical access control systems comply with applicable federal laws, Executive Orders, directives, policies, regulations, standards, and guidance. The Federal Identity, Credential, and Access Management Program provides implementation guidance for identity, credential, and access management capabilities for physical access control systems. Organizations have flexibility in the types of audit logs employed. Audit logs can be procedural (e.g., a written log of individuals accessing the facility and when such access occurred), automated (e.g., capturing ID provided by a PIV card), or some combination thereof. Physical access points can include facility access points, interior access points to information systems and/or components requiring supplemental access controls, or both. Components of organizational information systems (e.g., workstations, terminals) may be located in areas designated as publicly accessible with organizations safeguarding access to such devices. Related controls: AU-2, AU-6, MP-2, MP-4, PE-2, PE-4, PE-5, PS-3, RA-3.</p>	N/A.- Not enough information.
PL-8	PL-8,N_00	Planning	<p>INFORMATION SECURITY ARCHITECTURE</p> <p>Control: The organization:</p> <p>a. Develops an information security architecture for the information system that:</p> <p>1. Describes the overall philosophy, requirements, and approach to be taken with regard to protecting the confidentiality, integrity, and availability of organizational information;</p> <p>2. Describes how the information security architecture is integrated into and supports the enterprise architecture; and</p> <p>3. Describes any information security assumptions about, and dependencies on, external services;</p> <p>b. Reviews and updates the information security architecture [Assignment: organization-defined frequency] to reflect updates in the enterprise architecture; and</p> <p>c. Ensures that planned information security architecture changes are reflected in the security plan, the security Concept of Operations (CONOPS), and organizational procurements/acquisitions.</p>	<p>This control addresses actions taken by organizations in the design and development of information systems. The information security architecture at the individual information system level is consistent with and complements the more global, organization-wide information security architecture described in PM-7 that is integral to and developed as part of the enterprise architecture. The information security architecture includes an architectural description, the placement/allocation of security functionality (including security controls), security-related information for external interfaces, information being exchanged across the interfaces, and the protection mechanisms associated with each interface. In addition, the security architecture can include other important security-related information, for example, user roles and access privileges assigned to each role, unique security requirements, the types of information processed, stored, and transmitted by the information system, restoration priorities of information and information system services, and any other specific protection needs. In today's modern architecture, it is becoming less common for organizations to control all information resources. There are going to be key dependencies on external information services and service providers. Describing such dependencies in the information security architecture is important to developing a comprehensive mission/business protection strategy. Establishing, developing, documenting, and maintaining under configuration control, a baseline configuration for organizational information systems is critical to implementing and maintaining an effective information security architecture. The development of the information security architecture is coordinated with the Senior Agency Official for Privacy (SAOP)/Chief Privacy Officer (CPO) to ensure that security controls needed to support privacy requirements are identified and effectively implemented. PI, 8 is primarily directed at organizations (i.e., internally focused) to help ensure that organizations develop an information security architecture for the information system, and that the security architecture is integrated with or tightly coupled to the enterprise architecture through the organization-wide information security architecture. In contrast, SA-17 is primarily directed at external information technology product/system developers and integrators (although SA-17 could be used internally within Organizations strategically allocate security safeguards (procedural, technical, or both) in the security architecture so that adversaries have to overcome multiple safeguards to achieve their objective. Requiring adversaries to defeat multiple mechanisms makes it more difficult to successfully attack critical information resources (i.e., increases adversary work factor) and also increases the likelihood of detection. The coordination of allocated safeguards is essential to ensure that an attack that involves one safeguard does not create adverse unintended consequences (e.g., lockout, cascading alarms) by interfering with another safeguard. Placement of security safeguards is a key activity. Greater asset criticality or information value merits additional layering. Thus, an organization may choose to place anti-virus software at organizational boundary layers, email/web servers, notebook computers, and workstations to maximize the number of related safeguards adversaries must penetrate before compromising the information and information systems. Related controls: SC-29, SC-</p>	OK.- This is being considered.
PL-8(1)	PL-8(1),N_00	Planning	<p>INFORMATION SECURITY ARCHITECTURE DEFENSE-IN-DEPTH</p> <p>The organization designs its security architecture using a defense-in-depth approach that:</p> <p>(a) Allocates [Assignment: organization-defined security safeguards] to [Assignment: organization-defined locations and architectural layers]; and</p>	<p>Organizations strategically allocate security safeguards (procedural, technical, or both) in the security architecture so that adversaries have to overcome multiple safeguards to achieve their objective. Requiring adversaries to defeat multiple mechanisms makes it more difficult to successfully attack critical information resources (i.e., increases adversary work factor) and also increases the likelihood of detection. The coordination of allocated safeguards is essential to ensure that an attack that involves one safeguard does not create adverse unintended consequences (e.g., lockout, cascading alarms) by interfering with another safeguard. Placement of security safeguards is a key activity. Greater asset criticality or information value merits additional layering. Thus, an organization may choose to place anti-virus software at organizational boundary layers, email/web servers, notebook computers, and workstations to maximize the number of related safeguards adversaries must penetrate before compromising the information and information systems. Related controls: SC-29, SC-</p>	N/A.- Not enough information.
SC-5	SC-5,N_00	System and Communications Protection	<p>DENIAL OF SERVICE PROTECTION</p> <p>Control: The information system protects against or limits the effects of the following types of denial of service attacks: [Assignment: organization-defined types of denial of service attacks or reference to source for such information] by employing [Assignment: organization-defined security safeguards].</p>	<p>A variety of technologies exist to limit, or in some cases, eliminate the effects of denial of service attacks. For example, boundary protection devices can filter certain types of packets to protect information systems components on internal organizational networks from being directly affected by denial of service attacks. Employing increased capacity and bandwidth combined with service redundancy may also reduce the susceptibility to denial of service attacks. Related controls: SC-6, SC-7.</p>	N/A.- Not enough information.
SC-7	SC-7,N_00	System and Communications Protection	<p>BOUNDARY PROTECTION</p> <p>Control: The information system:</p> <p>a. Monitors and controls communications at the external boundary of the system and at key internal boundaries within the system;</p> <p>b. Implements subnetworks for publicly accessible system components that are [Selection: physically; logically] separated from internal organizational networks; and</p> <p>c. Connects to external networks or information systems only through managed interfaces consisting of boundary protection devices arranged in accordance with an organizational security architecture.</p>	<p>Managed interfaces include, for example, gateways, routers, firewalls, guards, network-based malicious code analysis and virtualization systems, or encrypted tunnels implemented within a security architecture (e.g., routers protecting firewalls or application gateways residing on protected subnetworks). Subnetworks that are physically or logically separated from internal networks are referred to as demilitarized zones or DMZs. Restricting or prohibiting interfaces within organizational information systems includes, for example, restricting external web traffic to designated web servers within managed interfaces and prohibiting external traffic that appears to be spoofing internal addresses. Organizations consider the shared nature of commercial telecommunications services in the implementation of security controls associated with the use of such services. Commercial telecommunications services are commonly based on network components and consolidated management systems shared by all attached commercial customers, and may also include third party-provided service lines and other sharing elements. Such transmission services may represent resources. This control applies to both internal and external networks and all types of information system components from which information can be transmitted (e.g., servers, mobile devices, notebook computers, printers, copiers, scanners, facsimile machines). Communication paths outside the physical protection of a controlled boundary are exposed to the possibility of interception and modification. Protecting the confidentiality and/or integrity of organizational information can be accomplished by physical means (e.g., by employing physical distribution systems) or by logical means (e.g., employing encryption techniques). Organizations relying on commercial providers offering transmission services as commodity services rather than as fully dedicated services (i.e., services which can be highly specialized to individual customer needs), may find it difficult to obtain the necessary assurances regarding the implementation of needed security controls for transmission confidentiality/integrity. In such situations, organizations determine what types of confidentiality/integrity services are available in standard, commercial telecommunication service packages. If it is infeasible or impractical to obtain the necessary security controls and assurances of control effectiveness through appropriate contracting vehicles, organizations implement appropriate compensating security controls or explicitly accept the additional risk. Related controls: AC-17, PE-4.</p>	GOOD.-This this is done in some capacity.
SC-8	SC-8,N_00	System and Communications Protection	<p>TRANSMISSION CONFIDENTIALITY AND INTEGRITY</p> <p>Control: The information system protects the [Selection (one or more): confidentiality; integrity] of transmitted information.</p>	<p>This control applies to both internal and external networks and all types of information system components from which information can be transmitted (e.g., servers, mobile devices, notebook computers, printers, copiers, scanners, facsimile machines). Communication paths outside the physical protection of a controlled boundary are exposed to the possibility of interception and modification. Protecting the confidentiality and/or integrity of organizational information can be accomplished by physical means (e.g., by employing physical distribution systems) or by logical means (e.g., employing encryption techniques). Organizations relying on commercial providers offering transmission services as commodity services rather than as fully dedicated services (i.e., services which can be highly specialized to individual customer needs), may find it difficult to obtain the necessary assurances regarding the implementation of needed security controls for transmission confidentiality/integrity. In such situations, organizations determine what types of confidentiality/integrity services are available in standard, commercial telecommunication service packages. If it is infeasible or impractical to obtain the necessary security controls and assurances of control effectiveness through appropriate contracting vehicles, organizations implement appropriate compensating security controls or explicitly accept the additional risk. Related controls: AC-17, PE-4.</p>	BAD.-This is not done at all.
SE-1	SE-1,N_00	Security	<p>INVENTORY OF PERSONALLY IDENTIFIABLE INFORMATION</p> <p>Control: The organization:</p> <p>a. Establishes, maintains, and updates [Assignment: organization-defined frequency] an inventory that contains a listing of all programs and information systems identified as collecting, using, maintaining, or sharing personally identifiable information (PII); and</p>	<p>The PII inventory enables organizations to implement effective administrative, technical, and physical security policies and procedures to protect PII consistent with Appendix F, and to mitigate risks of PII exposure. As one method of gathering information for their PII inventories, organizations may extract the following information elements from Privacy Impact Assessments (PIA) for information systems containing PII: (i) the name and acronym for each system identified; (ii) the types of PII contained in that system; (iii) classification of level of sensitivity of all types of PII, as combined in that information system; and (iv) classification of level of potential risk of substantial harm, embarrassment, inconvenience, or unfairness to affected individuals, as well as the financial or reputational risks to organizations, if PII is exposed. Organizations take due care in updating the inventories by identifying linkable data that could create PII. Related controls: AR-1, AR-4, AR-5, AT-1, PM-1, PM-5, UL-3.</p>	GOOD.-This this is done in some capacity.

Comments

I do not have enough information on every position and their access. For example, I don't have the CIO or the CFO access levels. I don't have their security policies on user accounts when an employee is terminated, emergency accounts, etc.

Looking at the System Diagram Fig.4: 1. The IT group has access to the Invoice folder, which is not part of their function. 2. The SalesTeam Group has access to the HR folder. Some these folders have sensitive information that should use the least privilege rule.

I would need to see their Computer Management and their Security Policy to determine what services should disable. Nothing mentioned in the information provided about the security policy and which services are running in the background that need to be disable.

The company_A maintains data center on th premise. They need to considered an off-premise back up data center.

The company does not have this as per the diagrams.

They do use a Lightweight Directory Access Protocol (LDAP) for authentication using username and password.

There is not enough information on when it comes to physical access control that was mentioned in the information on the Company_A..

The information system security architecture needs to be updated.

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They do have a firewall as well as DMZ.

There is not indication that there is any encryption/other protective measures when transmitting data.

There is an inventory of software that is being used to collect, maintain, etc. PII