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Your Standard

Full Assessment

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Prepared for: Client Company

Prepared by: YourIT Company

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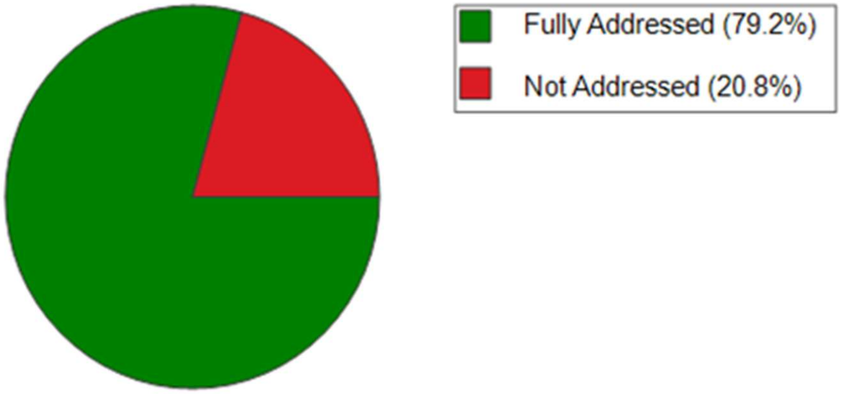
1 - Overview

We perform a periodic assessment of our information system environment with regards to the principals and functions set as part of NIST CSF 2.0. The assessment consists of automated scans in conjunction with a review by an Internal Assessor.

This document contains both direct evidence of compliance along with attestations by the Internal Assessor based on a review of materials and supporting documentation.

The methodology for the review and supporting documentation can be found in the various worksheets and documents (referenced in the NIST CSF 2.0 Assessor Checklist). Issues are noted in the NIST CSF 2.0 Plan of Action and Milestones. Technical Issues are noted in the Technical Risk Analysis and Technical Risk Treatment Plan.

2 - Summary



ASSESSMENT	# REQUIREMENTS
Fully Addressed	84
Not Addressed	22
Total Requirements	**106**

3 - Detailed Requirements Assessment

DE.AE-02 - Potentially Adverse Event Analysis

DE.AE-02: Potentially adverse events are analyzed to better understand associated activities.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Response and recovery plans are executed during or after an event. Notifications from detection systems are investigated and documented. The impact of the incident is analyzed and understood. Forensics are performed and incident are categorized.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS8.11 - Conduct Audit Log Reviews	Conduct reviews of audit logs to detect anomalies or abnormal events that could indicate a potential threat. Conduct reviews on a weekly, or more frequent, basis.	Fully Implemented	IT Security

DE.AE-03 - Event Information Correlation

DE.AE-03: Information is correlated from multiple sources.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.AE-03.01 - Event Information Correlation.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-03.01: The organization implements	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	systematic and real-time logging, collection, monitoring, detection, and alerting measures across multiple layers of the organization's infrastructure, including physical perimeters, network, operating systems, applications, data, and external (cloud and outsourced) environments, sufficient to protect the organization's information assets.		
CRI.DE.AE-03.02 - Event Information Correlation.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-03.02: The organization performs real-time central analysis, aggregation, and correlation of anomalous activities, network and system alerts, and relevant event and cyber threat intelligence, including both internal and external (cloud and outsourced) environments, to better detect and prevent multifaceted cyber attacks.	Fully Implemented	IT Security

DE.AE-04 - Impact & Scope Determination

DE.AE-04: The estimated impact and scope of adverse events are understood.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.AE-04.01 - Impact & Scope Determination	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-04.01: The organization has a documented process to analyze and triage incidents to assess root cause, technical impact,	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	mitigation priority, and business impact on the organization, as well as across the financial sector and other third party stakeholders.		

DE.AE-06 - Event Information Sharing

DE.AE-06: Information on adverse events is provided to authorized staff and tools.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Incident alert thresholds have been established by the Security Officer, who will review logs, either manually or through an automated process. IDS/IPS are especially helpful in identifying anomalies. Having network baselines helps rule out false positives in anomaly detection.

Tickets are created to communicate to other stakeholders the nature of detected incidents and organizational impact.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.AE-06.01 - Event Information Sharing	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-06.01: The organization has established processes and protocols to communicate, alert, and regularly report potential cyber attacks and incident information, including its corresponding analysis and cyber threat intelligence, to authorized internal and external stakeholders.	Fully Implemented	IT Security

DE.AE-07 - Contextual Analysis

DE.AE-07: Cyber threat intelligence and other contextual information are integrated into the analysis.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.AE-07.01 - Contextual Analysis.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-07.01: The organization implements measures for monitoring external sources (e.g., social media, the dark web, etc.) to integrate with other intelligence information to better detect and evaluate potential threats and compromises.	Fully Implemented	IT Security
CRI.DE.AE-07.02 - Contextual Analysis.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-07.02: Relevant event data is packaged for subsequent review and triage and events are categorized for efficient handling, assignment, and escalation.	Fully Implemented	IT Security

DE.AE-08 - Incident Declaration

DE.AE-08: Incidents are declared when adverse events meet the defined incident criteria.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

Incident alert thresholds have been established by the Security Officer, who will review logs, either manually or through an automated process. IDS/IPS are especially helpful in identifying anomalies. Having network baselines helps rule out false positives in anomaly detection.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.AE-08.01 - Incident Declaration	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-08.01: Defined criteria and severity levels are in place to facilitate the declaration, escalation, organization, and alignment of response activities to response plans	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	within the organization and across relevant third parties.		

DE.CM-01 - Network Monitoring

DE.CM-01: Networks and network services are monitored to find potentially adverse events.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

The Security Officer regularly reviews records associated with the monitoring of system activity to identify any patterns of activity that suggest the organization's security policies and procedures have been breached, either by members of its workforce or by outside individuals or organizations. The Security Officer determines whether security has been violated and takes appropriate corrective action, including changes in security policies and procedures.

All system and security patches are installed within 2 business days of being released. This includes operating systems, application software, malware definitions, and firewall intrusion prevention updates. Critical devices such as firewalls, network switches and infrastructure hardware, computers and servers, storage devices, and other equipment must be checked every 90-days for firmware updates.

Anti-malware software is installed on all endpoint devices and servers to protect the organization and its information from attack by malicious software such as computer viruses, worms, and Trojan horses. This software must be maintained with current subscriptions and regularly updated; must be turned on; and must be installed to prevent users from disabling or removing the software.

Workforce members are instructed to not disable anti-virus software and must immediately take action to report virus infections and remove viruses from affected machines when the anti-virus software identifies an infection

After a recent periodic review of the status of anti-virus software installed on Windows computer endpoints using automated scanning and reporting tools, 32% of all computer endpoints have the automatic update functionality of the anti-virus software installed on the identified endpoints set to disabled.

This incident has been reported and corrective action is underway.

Mobile devices are protected against malicious software (malware.)

The Security Officer regularly reviews records associated with the monitoring of system activity to identify any patterns of activity that suggest the organization's security policies and procedures have been breached, either by members of its workforce or by outside individuals or organizations. The Security Officer determines whether security has been violated and takes appropriate corrective action, including changes in security policies and procedures.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS13.1 - Centralize Security Event Alerting	Centralize security event alerting across enterprise assets for log correlation and analysis. Best practice implementation requires the use of a SIEM, which includes vendor-defined event correlation alerts. A log analytics platform configured with security-relevant correlation alerts also satisfies this Safeguard.	Fully Implemented	IT Security

DE.CM-02 - Physical Environment Monitoring

DE.CM-02: The physical environment is monitored to find potentially adverse events.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Operations

Comments:

Incident alert thresholds have been established by the Security Officer, who will review logs, either manually or through an automated process. IDS/IPS are especially helpful in identifying anomalies. Having network baselines helps rule out false positives in anomaly detection.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.DE.CM-02.01 - Physical Environment Monitoring	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.CM-02.01: The organization's controls include monitoring and detection of anomalous activities and potential intrusion events across the organization's physical environment and infrastructure, including the detection of environmental threats (fire, water, service outages, etc.) and unauthorized physical access to high-risk system components and locations.	Fully Implemented	Operations

DE.CM-03 - Personnel Activity Monitoring

DE.CM-03: Personnel activity and technology usage are monitored to find potentially adverse events.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Operations

Comments:

Roles and responsibilities for detection are defined by the Security Officer to ensure accountability. Detection activities must comply with all applicable requirements. Processes must be tested and continuously improved.

As a part of this process, personnel activity must be monitored to detect potential cybersecurity events.

The Security Officer regularly reviews records associated with the monitoring of system activity to identify any patterns of activity that suggest the organization's security policies and procedures have been breached, either by members of its workforce or by outside individuals or organizations. The Security Officer determines whether security has been violated and takes appropriate corrective action, including changes in security policies and procedures.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS10.7 - Use Behavior-Based Anti-Malware Software	Use behavior-based anti-malware software.	Fully Implemented	IT Systems

DE.CM-06 - Service Provider Monitoring

DE.CM-06: External service provider activities and services are monitored to find potentially adverse events.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Operations

Comments:

The Security Officer and other company leaders have implemented security processes to protect against risks from external service providers. Refer to the organization's system security plan for more specific information.

The Security Officer regularly reviews records associated with the monitoring of system activity to identify any patterns of activity that suggest the organization's security policies and procedures have been breached, either by members of its workforce or by outside individuals or organizations. The Security Officer determines whether security has been violated and takes appropriate corrective action, including changes in security policies and procedures.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.2 - Establish and Maintain a Service Provider Management Policy	Establish and maintain a service provider management policy.	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	Ensure the policy addresses the classification, inventory, assessment, monitoring, and decommissioning of service providers. Review and update the policy annually, or when significant enterprise changes occur that could impact this Safeguard.		
CIS15.6 - Monitor Service Providers	Monitor service providers consistent with the enterprise's service provider management policy. Monitoring may include periodic reassessment of service provider compliance, monitoring service provider release notes, and dark web monitoring.	Fully Implemented	IT Security

DE.CM-09 - Hardware, Software, & Data Monitoring

DE.CM-09: Computing hardware and software, runtime environments, and their data are monitored to find potentially adverse events.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, IT Security

Comments:

The Security Officer has implemented systems and processes to ensure that software, firmware, and information integrity is maintained according to the organization's policies.

All system and security patches are installed within 2 business days of being released. This includes operating systems, application software, malware definitions, and firewall intrusion prevention updates. Critical devices such as firewalls, network switches and infrastructure hardware, computers and servers, storage devices, and other equipment must be checked every 90-days for firmware updates.

Anti-malware software is installed on all endpoint devices and servers to protect the organization and its information from attack by malicious software such as computer viruses, worms, and Trojan horses. This software must be maintained with current subscriptions and regularly updated; must be turned on; and must be installed to prevent users from disabling or removing the software.

Workforce members are instructed to not disable anti-virus software and must immediately take action to report virus infections and remove viruses from affected machines when the anti-virus software identifies an infection

After a recent periodic review of the status of anti-virus software installed on Windows computer endpoints using automated scanning and reporting tools, 32% of all computer endpoints have the automatic update functionality of the anti-virus software installed on the identified endpoints set to disabled.

This incident has been reported and corrective action is underway.

Mobile devices are protected against malicious software (malware.)

The Security Officer regularly reviews records associated with the monitoring of system activity to identify any patterns of activity that suggest the organization's security policies and procedures have been breached, either by members of its workforce or by outside individuals or organizations. The Security Officer determines whether security has been violated and takes appropriate corrective action, including changes in security policies and procedures.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS10.1 - Deploy and Maintain Anti-Malware Software	Deploy and maintain anti-malware software on all enterprise assets.	Fully Implemented	IT Systems

GV.OC-01 - Organizational Mission

GV.OC-01: The organizational mission is understood and informs cybersecurity risk management.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Exec Mgmt

Comments:

The Security Officer collaborates with internal and external stakeholders to ensure that critical services are identified and prioritized, and that adequate resources are dedicated to ensuring the delivery of services and resilience to disruptions and disasters.

The organization’s place in critical infrastructure and its industry sector has been identified, documented, and communicated to all stakeholders.

On an ongoing basis, priorities for the organization’s mission, objectives, and activities are established, documented, and communicated periodically to all affected stakeholders.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OC-01.01 - Organizational Mission	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-01.01: Technology and cybersecurity strategies, architectures, and programs are formally governed to align with and support the organization's mission, objectives,	Fully Implemented	Exec Mgmt

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	priorities, tactical initiatives, and risk profile.		

GV.OC-02 - Stakeholder Risk Management Expectations

GV.OC-02: Internal and external stakeholders are understood, and their needs and expectations regarding cybersecurity risk management are understood and considered.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Exec Mgmt

Comments:

The Security Officer classifies each type of workforce and third-party user's role and responsibilities and define appropriate access levels and capabilities.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OC-02.01 - Stakeholder Risk Management Expectations.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.01: The organization's obligation to its customers, employees, and stakeholders to maintain safety and soundness, while balancing size and complexity, is reflected in the organization's risk management strategy and framework, its risk appetite and risk tolerance statements, and in a risk-aware culture.	Fully Implemented	Exec Mgmt
CRI.GV.OC-02.02 - Stakeholder Risk Management Expectations.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.02: Technology and cybersecurity risk management strategies identify and communicate the organization's role within the financial services sector as a component of critical infrastructure.	Fully Implemented	Exec Mgmt
CRI.GV.OC-02.03 - Stakeholder Risk Management Expectations.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.03: Technology and cybersecurity risk management strategies	Fully Implemented	Exec Mgmt

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	identify and communicate the organization's role as it relates to other critical infrastructure sectors outside of the financial services sector and the interdependency risks.		

GV.OC-03 - Legal, Regulatory, & Contractual Requirements

GV.OC-03: Legal, regulatory, and contractual requirements regarding cybersecurity - including privacy and civil liberties obligations - are understood and managed.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

The organization uses commercially reasonable efforts to comply with all applicable laws and regulations, including:
- Federal and State Laws
- Industry Regulations
- Contracts
- Insurance Policy Requirements

Information security roles & responsibilities will be coordinated and aligned with internal roles and external partners.

Legal and regulatory requirements regarding cybersecurity, including privacy and civil liberties obligations, must be understood and managed. Governance and risk management processes will address cybersecurity risks.

The Security Officer has identified all relevant compliance requirements, classifies each type of workforce and third-party user’s role and responsibilities, and defines appropriate access levels and capabilities. Processes will be developed to ensure compliance with all internal and external requirements.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OC-03.01 - Legal, Regulatory, & Contractual Requirements.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-03.01: The organization's technology and cybersecurity strategy, framework, and policies align and are consistent with the organization's legal, statutory, contractual, and regulatory obligations and ensure that compliance	Fully Implemented	Compliance, Legal

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	responsibilities are unambiguously assigned.		
CRI.GV.OC-03.02 - Legal, Regulatory, & Contractual Requirements.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-03.02: The organization implements and maintains a documented policy or policies that address customer data privacy that is approved by a designated officer or the organization's appropriate governing body (e.g., the Board or one of its committees).	Fully Implemented	Compliance, Legal

GV.OC-04 - Stakeholder Service Expectations

GV.OC-04: Critical objectives, capabilities, and services that stakeholders depend on or expect from the organization are understood and communicated.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

The organization's role in the supply chain is identified and communicated. This includes the organization's position with clients, vendors, and partners.

The organization's place in critical infrastructure and its industry sector must be identified, documented, and communicated.

Priorities for the organization's mission, objectives, and activities must be established, documented, and communicated.

The Security Officer collaborates with internal and external stakeholders to ensure that critical services are identified and prioritized, and verifies that adequate resources are dedicated to ensuring the delivery of services and resilience to disruptions and disasters

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OC-04.01 - Stakeholder Service Expectations.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.01: The organization maintains an inventory of key internal assets, business functions, and external dependencies that includes mappings to other assets, business	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	functions, and information flows.		
CRI.GV.OC-04.02 - Stakeholder Service Expectations.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.02: The organization documents the business processes that are critical for the delivery of services and the functioning of the organization, and the impacts to the business if those processes are degraded or not functioning.	Fully Implemented	Governance
CRI.GV.OC-04.03 - Stakeholder Service Expectations.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.03: Resilience requirements to support the delivery of critical services are established for all operating states (e.g., under duress/attack, during recovery, and normal operations).	Fully Implemented	Governance
CRI.GV.OC-04.04 - Stakeholder Service Expectations.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.04: The organization prioritizes the resilience design, planning, testing, and monitoring of systems and other key internal and external dependencies according to their criticality to the supported business functions, enterprise mission, and to the financial services sector.	Fully Implemented	Governance

GV.OC-05 - Organizational Service Dependencies

GV.OC-05: Outcomes, capabilities, and services that the organization depends on are understood and communicated.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Exec Mgmt

Comments:

The organization’s role in the supply chain is identified and communicated. This includes the organization’s position with clients, vendors, and partners.

The organization’s place in critical infrastructure and its industry sector must be identified, documented, and communicated.

Priorities for the organization’s mission, objectives, and activities must be established, documented, and communicated.

The Security Officer collaborates with internal and external stakeholders to ensure that critical services are identified and prioritized, and verifies that adequate resources are dedicated to ensuring the delivery of services and resilience to disruptions and disasters

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OC-05.01 - Organizational Service Dependencies.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.01: The organization identifies, assesses, and documents the key dependencies, interdependencies, and potential points of failure to support the delivery of critical services (e.g., systems, business processes, workforce, third parties, facilities, etc.)	Fully Implemented	Exec Mgmt
CRI.GV.OC-05.02 - Organizational Service Dependencies.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.02: The organization has prioritized its external dependencies according to their criticality to the supported enterprise mission, business functions, and to the financial services sector.	Fully Implemented	Exec Mgmt
CRI.GV.OC-05.03 - Organizational Service Dependencies.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.03: The organization defines objectives (e.g., Recovery Time Objective, Maximum Tolerable Downtime, Impact Tolerance) for the resumption of critical operations in alignment with business imperatives, stakeholder obligations, and critical infrastructure dependencies.	Fully Implemented	Exec Mgmt
CRI.GV.OC-05.04 - Organizational Service Dependencies.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.04: Recovery point objectives to support data integrity are consistent with the organization's recovery time objectives, information flow dependencies	Fully Implemented	Exec Mgmt

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	between systems, and business obligations.		

GV.OV-01 - Risk Management Strategy Outcomes Review

GV.OV-01: Cybersecurity risk management strategy outcomes are reviewed to inform and adjust strategy and direction.

Overall Assessment: **Not Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OV-01.01 - Risk Management Strategy Outcomes Review.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.01: The governing authority (e.g., the Board or one of its committees) regularly reviews and evaluates the organization's ability to manage its technology, cybersecurity, third-party, and resilience risks.	Not Implemented	Governance
CRI.GV.OV-01.02 - Risk Management Strategy Outcomes Review.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.02: The designated Cybersecurity Officer (e.g., CISO) periodically reports to the appropriate governing authority (e.g., the Board or one of its committees) or equivalent governing body on the status of cybersecurity within the organization.	Not Implemented	Governance
CRI.GV.OV-01.03 - Risk Management Strategy Outcomes Review.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.03: The designated Technology Officer (e.g., CIO or CTO) regularly reports to the governing authority (e.g., the Board or one of its committees) on the status	Not Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	of technology use and risks within the organization.		

GV.OV-02 - Risk Management Strategy Review & Adjustment

GV.OV-02: The cybersecurity risk management strategy is reviewed and adjusted to ensure coverage of organizational requirements and risks.

Overall Assessment: **Not Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OV-02.01 - Risk Management Strategy Review & Adjustment.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-02.01: The organization regularly assesses its inherent technology and cybersecurity risks and ensures that changes to the business and threat environment lead to updates to the organization's strategies, programs, risk appetite and risk tolerance.	Not Implemented	Governance
CRI.GV.OV-02.02 - Risk Management Strategy Review & Adjustment.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-02.02: The organization determines and articulates how it intends to maintain an acceptable level of residual technology and cybersecurity risk as set by the governing authority (e.g., the Board or one of its committees).	Not Implemented	Governance

GV.OV-03 - Risk Management Performance Measurement

GV.OV-03: Organizational cybersecurity risk management performance is evaluated and reviewed for adjustments needed.

Overall Assessment: **Not Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.OV-03.01 - Risk Management Performance Measurement.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-03.01: The organization develops, implements, and reports to management and the governing body (e.g., the Board or one of its committees) key technology and cybersecurity risk and performance indicators and metrics to measure, monitor, and report actionable indicators.	Not Implemented	Governance
CRI.GV.OV-03.02 - Risk Management Performance Measurement.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-03.02: Resilience program performance is measured and regularly reported to senior executives and the governing authority (e.g., the Board or one of its committees).	Not Implemented	Governance

GV.PO-01 - Establishment of Policies & Procedures

GV.PO-01: Policy for managing cybersecurity risks is established based on organizational context, cybersecurity strategy, and priorities and is communicated and enforced.

Overall Assessment: **Addressed**

Assessed by: Compliance Dept, Governance Dept

Comments:

The organization's security policy is reviewed by the organization’s management each year and updated as necessary. The policy and any changes must be communicated to all workforce members.

The Security Officer ensures that information security policies are established, reviewed, and updates as necessary.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.PO-01.01 - Establishment of Policies & Procedures.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.01: Technology and cybersecurity policies are documented, maintained and approved by the governing authority (e.g., the Board or one of its committees) or a designated executive.	Fully Implemented	Governance
CRI.GV.PO-01.02 - Establishment of Policies & Procedures.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.02: The accountable governing body, and applicable cybersecurity program and policies, for any given organizational unit, affiliate, or merged entity are clearly established, applied, and communicated.	Fully Implemented	Governance
CRI.GV.PO-01.03 - Establishment of Policies & Procedures.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.03: The organization's incentive programs are consistent with cyber risk management objectives, and technology and cybersecurity policies integrate with an employee accountability policy to ensure that all personnel are held accountable for complying with policies.	Fully Implemented	Governance
CRI.GV.PO-01.04 - Establishment of Policies & Procedures.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.04: All personnel (employees and third party) consent to policies addressing acceptable technology use, social media use, personal device use (e.g., BYOD), confidentiality, and/or other security-related policies and agreements as warranted by their position.	Fully Implemented	Governance
CRI.GV.PO-01.05 - Establishment of Policies & Procedures.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.05: Technology and cybersecurity processes, procedures, and controls	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	are established in alignment with cybersecurity policy.		
CRI.GV.PO-01.06 - Establishment of Policies & Procedures.06	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.06: Physical and environmental security policies are implemented and managed.	Fully Implemented	Governance
CRI.GV.PO-01.07 - Establishment of Policies & Procedures.07	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.07: The organization maintains documented business continuity and resilience program policies and procedures approved by the governing authority (e.g., the Board or one of its committees).	Fully Implemented	Governance
CRI.GV.PO-01.08 - Establishment of Policies & Procedures.08	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.08: The organization maintains documented third-party risk management program policies and procedures approved by the governing authority (e.g., the Board or one of its committees).	Fully Implemented	Governance

GV.PO-02 - Policy & Procedure Review & Update

GV.PO-02: Policy for managing cybersecurity risks is reviewed, updated, communicated, and enforced to reflect changes in requirements, threats, technology, and organizational mission.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

The organization's security policy is reviewed by the organization’s management each year and updated as necessary. The policy and any changes must be communicated to all workforce members.

The Security Officer ensures that information security policies are established, reviewed, and updates as necessary.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.PO-02.01 - Policy & Procedure Review & Update	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-02.01: The cybersecurity policy is regularly reviewed, revised, and communicated under the leadership of a designated Cybersecurity Officer (e.g., CISO) to address changes in the risk profile and risk appetite, the evolving threat environment, and new technologies, products, services, and interdependencies.	Not Implemented	Governance

GV.RM-01 - Risk Management Objectives Agreement

GV.RM-01: Risk management objectives are established and agreed to by organizational stakeholders.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The Security Officer has implemented a comprehensive risk-management program based on the results of the risk analysis. Risk remediation, reduction, sharing, or acceptance plans will be based on the organization’s regulatory requirements or tolerance for risk.

Exhibits:

- Information-Security-Policy.pdf
- Information-Security-Risk-Management-Standard.pdf
- Risk-Assessment-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-01.01 - Risk Management Objectives Agreement.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.01: Technology and cybersecurity risk management strategies and frameworks are approved by the governing authority (e.g., the Board or one of its committees) and incorporated into the overall business strategy and enterprise risk management framework.	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-01.02 - Risk Management Objectives Agreement.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.02: Technology and cybersecurity risk management strategies and frameworks are informed by applicable international, national, and financial services industry standards and guidelines.	Fully Implemented	Governance
CRI.GV.RM-01.03 - Risk Management Objectives Agreement.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.03: The organization has established, and maintains, technology and cybersecurity programs designed to protect the confidentiality, integrity and availability of its information and operational systems, commensurate with the organization's risk appetite and business needs.	Fully Implemented	Governance
CRI.GV.RM-01.04 - Risk Management Objectives Agreement.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.04: Technology and cybersecurity risk management programs incorporate risk identification, measurement, monitoring, and reporting.	Fully Implemented	Governance
CRI.GV.RM-01.05 - Risk Management Objectives Agreement.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.05: The organization's technology, cybersecurity, resilience, and third-party risk management programs, policies, resources, and priorities are aligned and mutually supporting.	Fully Implemented	Governance

GV.RM-02 - Risk Appetite & Risk Tolerance Statements

GV.RM-02: Risk appetite and risk tolerance statements are established, communicated, and maintained.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The organization management has the right to determine its acceptable tolerance for risk. However, the organization will not accept risks that violate state, federal, or industry regulations such as data breach laws, HIPAA, or the Payment Card Industry Data Security Standard (PCI-DSS).

The Security Officer periodically meets with senior leadership and other stakeholders to review current risks and identify the organization's tolerance for risk, considering all internal and external requirements.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-02.01 - Risk Appetite & Risk Tolerance Statements.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.01: The governing authority (e.g., the Board or one of its committees) endorses and regularly reviews technology and cybersecurity risk appetite and is regularly informed about the status of, and material changes to, the organization's inherent risk profile.	Fully Implemented	Exec Mgmt, Governance
CRI.GV.RM-02.02 - Risk Appetite & Risk Tolerance Statements.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.02: The organization has established statements of technology and cybersecurity risk tolerance consistent with its risk appetite, and has integrated them into technology, cybersecurity, operational, and enterprise risk management practices.	Fully Implemented	Exec Mgmt, Governance
CRI.GV.RM-02.03 - Risk Appetite & Risk Tolerance Statements.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.03: Determination of the organization's risk appetite and tolerance includes consideration of the organization's stakeholder obligations, role in critical infrastructure, and sector-specific risk analysis.	Fully Implemented	Exec Mgmt, Governance

GV.RM-03 - Enterprise Risk Integration

GV.RM-03: Cybersecurity risk management activities and outcomes are included in enterprise risk management processes.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The organization conducts periodic risk analysis to evaluate the likelihood and the impact that each security threat or vulnerability might occur.

The risk analysis describes the nature and extent of the damage each threat might cause to the integrity, availability, and confidentiality of the organization's information resources.

The risk analysis identifies high-priority threats that are the focus of risk-management efforts.

Medium and low priority threats are also identified and reviewed for mitigation.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-03.01 - Enterprise Risk Integration.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.01: Technology and cybersecurity risk management frameworks and programs are integrated into the enterprise risk management framework.	Fully Implemented	Governance
CRI.GV.RM-03.02 - Enterprise Risk Integration.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.02: The organization's business continuity and resilience strategy and program align with and support the overall enterprise risk management framework.	Fully Implemented	Governance
CRI.GV.RM-03.03 - Enterprise Risk Integration.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.03: Technology and cybersecurity risk management and risk assessment processes are consistent with the organization's enterprise risk management policies, procedures, and methodologies and include criteria for the evaluation and categorization of enterprise-specific risks and threats.	Fully Implemented	Governance
CRI.GV.RM-03.04 - Enterprise Risk Integration.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.04: Technology and cybersecurity risk management	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	considerations are integrated into daily operations, cultural norms, management discussions, and management decision-making, and are tailored to address enterprise-specific risks (both internal and external).		

GV.RM-04 - Risk Response Strategic Direction

GV.RM-04: Strategic direction that describes appropriate risk response options is established and communicated.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The organization management has the right to determine its acceptable tolerance for risk. However, the organization will not accept risks that violate state, federal, or industry regulations such as data breach laws, HIPAA, or the Payment Card Industry Data Security Standard (PCI-DSS).

The Security Officer periodically meets with senior leadership and other stakeholders to review current risks and identify the organization's tolerance for risk, considering all internal and external requirements.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-04.01 - Risk Response Strategic Direction	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-04.01: The governing authority (e.g., the Board or one of its committees) and senior management provide guidance, direction, and credible challenge in the design and implementation of risk management strategies, assessment of identified risks against risk appetite and risk tolerance, and in the selection of risk treatment approaches.	Fully Implemented	Governance

GV.RM-05 - Lines of Communication

GV.RM-05: Lines of communication across the organization are established for cybersecurity risks, including risks from suppliers and other third parties.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-05.01 - Lines of Communication.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-05.01: The organization has a process for monitoring its technology, cybersecurity, and third-party risks, including escalating those risks that exceed risk appetite to management and identifying risks with the potential to impact multiple operating units.	Not Implemented	Governance
CRI.GV.RM-05.02 - Lines of Communication.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-05.02: The organization establishes minimum requirements for its third-parties that include how the organizations will communicate and coordinate in times of emergency, including: 1) Joint maintenance of contingency plans; 2) Responsibilities for responding to incidents, including forensic investigations; 3) Planning and testing strategies that address severe events in order to identify single points of failure that would cause wide-scale disruption; and 4) Incorporating the potential impact of an incident into their BCM process and ensure resilience capabilities are in place.	Not Implemented	Governance

GV.RM-06 - Standardized Risk Management Method

GV.RM-06: A standardized method for calculating, documenting, categorizing, and prioritizing cybersecurity risks is established and communicated.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The Security Officer has implemented a comprehensive risk-management program based on the results of the risk analysis. Risk remediation, reduction, sharing, or acceptance plans will be based on the organization’s regulatory requirements or tolerance for risk.

Exhibits:

- Information-Security-Policy.pdf
- Information-Security-Risk-Management-Standard.pdf
- Risk-Assessment-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-06.01 - Standardized Risk Management Method	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-06.01: Technology and cybersecurity risk management and risk assessment processes and methodologies are documented and regularly reviewed and updated to address changes in the risk profile and risk appetite, the evolving threat environment, and new technologies, products, services, and interdependencies.	Fully Implemented	Governance

GV.RM-07 - Strategic Opportunities

GV.RM-07: Strategic opportunities (i.e., positive risks) are characterized and are included in organizational cybersecurity risk discussions.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RM-07.01 - Strategic Opportunities	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-07.01: The organization has mechanisms in place to ensure that strategies, initiatives, opportunities, and emerging technologies (e.g., artificial intelligence, quantum computing, etc.) are evaluated both in terms of risks and uncertainties that are potentially detrimental to the organization, as well as potentially advantageous to the organization (i.e., positive risks).	Not Implemented	Governance

GV.RR-01 - Organizational Leadership Responsibility

GV.RR-01: Organizational leadership is responsible and accountable for cybersecurity risk and fosters a culture that is risk-aware, ethical, and continually improving.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS14.1 - Establish and Maintain a Security Awareness Program	Establish and maintain a security awareness program. The purpose of a security awareness program is to educate the enterprise’s workforce on how to interact with enterprise assets and data in a secure manner. Conduct training at hire and, at a minimum, annually. Review and update content annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security

GV.RR-02 - Risk Management Roles & Responsibilities

GV.RR-02: Roles, responsibilities, and authorities related to cybersecurity risk management are established, communicated, understood, and enforced.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

Only workforce members authorized by the organization’s management may access client systems, and only for authorized purposes.

Authorized workforce members must only use access control system approved by the organization to access client sites and data. Access is limited to the minimum required for the workforce members’ role.

Information and Cybersecurity roles and responsibilities for the entire workforce and third-party stakeholders (e.g., suppliers, customers, partners) are established.

The organization’s workforce members are required to maintain confidentiality of client information as if it was the organization’s information.

Specifically,
- Workforce members will only access client sites and data using approved mechanisms.
- No protected information may be removed from client site by physical or electronic means without specific authorization by the organization’s management.
- If removal is approved, client data must be encrypted before transmission or physical movement
- No information overheard or seen at customer sites may be shared for purposes other than those authorized by the organization
- Workforce members will be trained on all regulations appropriate to their work with clients
- Workforce members will be subject to all civil and criminal penalties for non-compliance with regulations required of clients

Any client information protected by federal, state, or industry regulations must be managed in accordance with those regulations.

The Security Officer will classify each type of workforce and third-party user’s role and responsibilities and define appropriate access levels and capabilities.

Roles and responsibilities for detection are well defined by the Security Officer to ensure accountability. Detection activities must comply with all applicable requirements. Processes must be tested and continuously improved.

A baseline of network operations and expected data flows for users and systems must be established and managed.

Detected events are analyzed to understand attack targets and methods. Event data are aggregated and correlated from multiple sources and sensors. Impact of events must be determined.

Incident alert thresholds ae established by the Security Officer, who will review logs, either manually or through an automated process. IDS/IPS are especially helpful in identifying anomalies. Having network baselines helps rule out false positives in anomaly detection.

Personnel activity is monitored to detect potential cybersecurity events.

Suspected or proven event detection information is communicated to appropriate parties in time to comply with all applicable requirements.

The Security Officer and system administrators oversee the implementation of security tools and processes to detect and manage unusual or unauthorized activity.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS14.9 - Conduct Role-Specific Security Awareness and Skills Training	Conduct role-specific security awareness and skills training. Example implementations include secure system administration courses for IT professionals, OWASP® Top 10 vulnerability awareness and prevention training for web application developers, and advanced social engineering awareness training for high-profile roles.	Fully Implemented	IT Security

GV.RR-03 - Resource Adequacy

GV.RR-03: Adequate resources are allocated commensurate with the cybersecurity risk strategy, roles, responsibilities, and policies.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The Security Officer has implemented a comprehensive risk-management program based on the results of the risk analysis. Risk remediation, reduction, sharing, or acceptance plans will be based on the organization’s regulatory requirements or tolerance for risk.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.RR-03.01 - Resource Adequacy.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.01: The organization's budgeting and resourcing processes identify, prioritize, and address resource needs to	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	manage identified technology and cybersecurity risks (e.g., skill shortages, headcount, new tools, incident-related expenses, and unsupported systems).		
CRI.GV.RR-03.02 - Resource Adequacy.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.02: The organization regularly assesses its skill and resource level requirements against its current personnel complement to determine gaps in resource need.	Fully Implemented	Governance
CRI.GV.RR-03.03 - Resource Adequacy.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.03: The organization provides adequate resources, appropriate authority, and access to the governing authority for the designated Cybersecurity Officer (e.g., CISO).	Fully Implemented	Governance

GV.RR-04 - Human Resource Practices

GV.RR-04: Cybersecurity is included in human resources practices.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The Security Officer and HR Director plan to oversee a new implementation of processes to ensure that security is maintained according to the organization’s policies.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS6.1 - Establish an Access Granting Process	Establish and follow a process, preferably automated, for granting access to enterprise assets upon new hire, rights grant, or role change of a user.	Fully Implemented	IT Security
CIS6.2 - Establish an Access Revoking Process	Establish and follow a process, preferably automated, for revoking access to enterprise	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	assets, through disabling accounts immediately upon termination, rights revocation, or role change of a user. Disabling accounts, instead of deleting accounts, may be necessary to preserve audit trails.		

GV.SC-01 - Supply Chain Risk Management Program

GV.SC-01: A cybersecurity supply chain risk management program, strategy, objectives, policies, and processes are established and agreed to by organizational stakeholders.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.2 - Establish and Maintain a Service Provider Management Policy	Establish and maintain a service provider management policy. Ensure the policy addresses the classification, inventory, assessment, monitoring, and decommissioning of service providers. Review and update the policy annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	Governance

GV.SC-02 - Third Party Roles & Responsibilities

GV.SC-02: Cybersecurity roles and responsibilities for suppliers, customers, and partners are established, communicated, and coordinated internally and externally.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

Only workforce members authorized by the organization’s management may access client systems, and only for authorized purposes.

Authorized workforce members must only use access control systems approved by the organization to access client sites and data. Access is limited to the minimum required for the workforce members’ role.

Information and Cybersecurity roles and responsibilities for the entire workforce and third-party stakeholders (e.g., suppliers, customers, partners) are established.

The organization’s workforce members are required to maintain confidentiality of client information as if it was the organization’s information.

Specifically,

- Workforce members will only access client sites and data using approved mechanisms.
- No protected information may be removed from client site by physical or electronic means without specific authorization by the organization’s management.
- If removal is approved, client data must be encrypted before transmission or physical movement
- No information overheard or seen at customer sites may be shared for purposes other than those authorized by the organization
- Workforce members will be trained on all regulations appropriate to their work with clients
- Workforce members will be subject to all civil and criminal penalties for non-compliance with regulations required of clients

Any client information protected by federal, state, or industry regulations must be managed in accordance with those regulations.

The Security Officer will classify each type of workforce and third-party user’s role and responsibilities and define appropriate access levels and capabilities.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.4 - Ensure Service Provider Contracts Include Security Requirements	Ensure service provider contracts include security requirements. Example requirements may include minimum security program requirements, security incident and/or data breach notification and response, data encryption requirements, and data disposal commitments. These security requirements must be consistent with the enterprise’s service provider management policy. Review service provider contracts annually to ensure contracts are not missing security requirements.	Fully Implemented	IT Security

GV.SC-03 - Supply Chain Risk Management Integration

GV.SC-03: Cybersecurity supply chain risk management is integrated into cybersecurity and enterprise risk management, risk assessment, and improvement processes.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.GV.SC-03.01 - Supply Chain Risk Management Integration	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.SC-03.01: The organization's third-party risk management strategy and program aligns with and supports its enterprise, technology, cybersecurity, and resilience risk management frameworks and programs.	Not Implemented	Compliance, Governance

GV.SC-04 - Supplier Identification & Prioritization

GV.SC-04: Suppliers are known and prioritized by criticality.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.1 - Establish and Maintain an Inventory of Service Providers	Establish and maintain an inventory of service providers. The inventory is to list all known service providers, include classification(s), and designate an enterprise contact for each service provider. Review and	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	update the inventory annually, or when significant enterprise changes occur that could impact this Safeguard.		
CIS15.3 - Classify Service Providers	Classify service providers. Classification consideration may include one or more characteristics, such as data sensitivity, data volume, availability requirements, applicable regulations, inherent risk, and mitigated risk. Update and review classifications annually, or when significant enterprise changes occur that could impact this Safeguard.	Not Implemented	Governance

GV.SC-05 - Cybersecurity Risks & Supply Chain Contracts

GV.SC-05: Requirements to address cybersecurity risks in supply chains are established, prioritized, and integrated into contracts and other types of agreements with suppliers and other relevant third parties.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.4 - Ensure Service Provider Contracts Include Security Requirements	Ensure service provider contracts include security requirements. Example requirements may include minimum security program requirements, security incident and/or data breach notification and response, data encryption requirements, and data disposal commitments. These security requirements must be consistent with the enterprise's service provider management policy. Review service provider contracts annually	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	to ensure contracts are not missing security requirements.		

GV.SC-06 - Supplier Due Diligence

GV.SC-06: Planning and due diligence are performed to reduce risks before entering into formal supplier or other third-party relationships.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.5 - Assess Service Providers	Assess service providers consistent with the enterprise's service provider management policy. Assessment scope may vary based on classification(s), and may include review of standardized assessment reports, such as Service Organization Control 2 (SOC 2) and Payment Card Industry (PCI) Attestation of Compliance (AoC), customized questionnaires, or other appropriately rigorous processes. Reassess service providers annually, at a minimum, or with new and renewed contracts.	Fully Implemented	IT Security

GV.SC-07 - Supplier Risk Assessment and Risk Management

GV.SC-07: The risks posed by a supplier, their products and services, and other third parties are understood, recorded, prioritized, assessed, responded to, and monitored over the course of the relationship.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.6 - Monitor Service Providers	Monitor service providers consistent with the enterprise's service provider management policy. Monitoring may include periodic reassessment of service provider compliance, monitoring service provider release notes, and dark web monitoring.	Fully Implemented	IT Security

GV.SC-08 - Third Party Incident Management Integration

GV.SC-08: Relevant suppliers and other third parties are included in incident planning, response, and recovery activities.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.4 - Ensure Service Provider Contracts Include Security Requirements	Ensure service provider contracts include security requirements. Example requirements may include minimum security program requirements, security incident and/or data breach notification and response, data encryption requirements, and data disposal commitments. These security requirements must be consistent with the enterprise's service provider management policy. Review service provider contracts annually	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	to ensure contracts are not missing security requirements.		

GV.SC-09 - Supply Chain Security Practice Integration

GV.SC-09: Supply chain security practices are integrated into cybersecurity and enterprise risk management programs, and their performance is monitored throughout the technology product and service life cycle.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.6 - Monitor Service Providers	Monitor service providers consistent with the enterprise’s service provider management policy. Monitoring may include periodic reassessment of service provider compliance, monitoring service provider release notes, and dark web monitoring.	Fully Implemented	IT Security

GV.SC-10 - Third Party Post Relationship Risk Management

GV.SC-10: Cybersecurity supply chain risk management plans include provisions for activities that occur after the conclusion of a partnership or service agreement.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.7 - Securely Decommission Service Providers	Securely decommission service providers. Example considerations include user and service account deactivation, termination of data flows, and secure disposal of enterprise data within service provider systems.	Fully Implemented	IT Security

ID.AM-01 - Hardware Inventory

ID.AM-01: Inventories of hardware managed by the organization are maintained.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

Hardware Inventory Procedure: The organization will utilize an automated tool to scan our network to identify assets at least each calendar quarter. Manual inventories will supplement the automated tools to document devices and systems that cannot be identified through automation.

Software Inventory Procedure: The organization will utilize an automated tool to scan our network to identify software platforms and applications at least each calendar quarter. Manual inventories will supplement the automated tools to document platforms, applications, and cloud-based applications that cannot be identified through automation.

Exhibits:

- Acceptable-Use-of-Information-Technology-Resources-Policy.pdf
- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Identification-and-Authentication-Policy.pdf
- Information-Security-Policy.pdf
- Security-Assessment-and-Authorization-Policy.pdf
- Security-Awareness-and-Training-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS1.1 - Establish and Maintain Detailed Enterprise Asset Inventory	Establish and maintain an accurate, detailed, and up-to-date inventory of all enterprise assets with the potential to store or process data, to include: end-user devices (including portable and mobile), network devices, non-computing/IoT devices, and	Fully Implemented	IT Systems

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	servers. Ensure the inventory records the network address (if static), hardware address, machine name, enterprise asset owner, department for each asset, and whether the asset has been approved to connect to the network. For mobile end-user devices, MDM type tools can support this process, where appropriate. This inventory includes assets connected to the infrastructure physically, virtually, remotely, and those within cloud environments. Additionally, it includes assets that are regularly connected to the enterprise's network infrastructure, even if they are not under control of the enterprise. Review and update the inventory of all enterprise assets bi-annually, or more frequently.		

ID.AM-02 - Software, Services, & Systems Inventory

ID.AM-02: Inventories of software, services, and systems managed by the organization are maintained.

Overall Assessment: **Addressed**

Assessed by: IT Systems

Comments:

Hardware Inventory Procedure: The organization will utilize an automated tool to scan our network to identify assets at least each calendar quarter. Manual inventories will supplement the automated tools to document devices and systems that cannot be identified through automation.

Software Inventory Procedure: The organization will utilize an automated tool to scan our network to identify software platforms and applications at least each calendar quarter. Manual inventories will supplement the automated tools to document platforms, applications, and cloud-based applications that cannot be identified through automation.

Exhibits:

- Acceptable-Use-of-Information-Technology-Resources-Policy.pdf
- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Identification-and-Authentication-Policy.pdf

- Information-Security-Policy.pdf
- Security-Assessment-and-Authorization-Policy.pdf
- Security-Awareness-and-Training-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS2.1 - Establish and Maintain a Software Inventory	Establish and maintain a detailed inventory of all licensed software installed on enterprise assets. The software inventory must document the title, publisher, initial install/use date, and business purpose for each entry; where appropriate, include the Uniform Resource Locator (URL), app store(s), version(s), deployment mechanism, and decommission date. Review and update the software inventory bi-annually, or more frequently.	Fully Implemented	IT Systems

ID.AM-03 - Network Communications & Data Flows

ID.AM-03: Representations of the organization's authorized network communication and internal and external network data flows are maintained.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

Hardware Inventory Procedure: The organization will utilize an automated tool to scan our network to identify assets at least each calendar quarter. Manual inventories will supplement the automated tools to document devices and systems that cannot be identified through automation.

Software Inventory Procedure: The organization will utilize an automated tool to scan our network to identify software platforms and applications at least each calendar quarter. Manual inventories will supplement the automated tools to document platforms, applications, and cloud-based applications that cannot be identified through automation.

The Security Officer develops and communicates baseline configurations markets and a written System Development Life Cycle to ensure that all devices and services provide an adequate level of security to meet the needs of the organization. The life cycle takes into consideration performance, security, and the needs of the organization to remain competitive in its

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.8 - Document Data Flows	Document data flows. Data flow documentation includes service provider data flows and should be based on the enterprise's data management process. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	Data Protection

ID.AM-04 - Supplier Services Inventory

ID.AM-04: Inventories of services provided by suppliers are maintained.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

Hardware Inventory Procedure: The organization will utilize an automated tool to scan our network to identify assets at least each calendar quarter. Manual inventories will supplement the automated tools to document devices and systems that cannot be identified through automation.

Software Inventory Procedure: The organization will utilize an automated tool to scan our network to identify software platforms and applications at least each calendar quarter. Manual inventories will supplement the automated tools to document platforms, applications, and cloud-based applications that cannot be identified through automation.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS15.1 - Establish and Maintain an Inventory of Service Providers	Establish and maintain an inventory of service providers. The inventory is to list all known service providers, include classification(s), and designate an enterprise contact for each service provider. Review and update the inventory annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	Governance

ID.AM-05 - Asset Protection Prioritization

ID.AM-05: Assets are prioritized based on classification, criticality, resources, and impact on the mission.

Overall Assessment: **Addressed**

Assessed by: IT Systems

Comments:

The Security Officer has implemented manual and automated processes to classify and secure the organization's resources (e.g., hardware, devices, data, and software).

To date, the criticality of workforce members' access to organization systems has not been established.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.7 - Establish and Maintain a Data Classification Scheme	Establish and maintain an overall data classification scheme for the enterprise. Enterprises may use labels, such as "Sensitive," "Confidential," and "Public," and classify their data according to those labels. Review and update the classification scheme annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	Data Protection

ID.AM-07 - Data & Metadata Inventory

ID.AM-07: Inventories of data and corresponding metadata for designated data types are maintained.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.2 - Establish and Maintain a Data Inventory	Establish and maintain a data inventory, based on the enterprise's data management process. Inventory sensitive data, at a minimum. Review and update inventory annually, at a minimum, with a priority on sensitive data.	Fully Implemented	Data Protection

ID.AM-08 - Asset Life Cycle Management

ID.AM-08: Systems, hardware, software, services, and data are managed throughout their life cycles.

Overall Assessment: **Addressed**

Assessed by: Data Protection, IT Security

Comments:

The Security Officer plans to implement controls and audit practices to prevent the removal of data, including controls to prevent e-mailing or storing data on removable media.

The Security Officer has developed and communicated to the organization the baseline configurations and a written System Development Life Cycle to ensure that all devices and services provide an adequate level of security to meet the needs of the organization. This life cycle should consider performance, security, and the needs of the organization to remain competitive in its markets.

The Security Officer oversees appropriate maintenance support, including contractual service level agreements, to ensure that security is maintained according to the organization’s policies.

The Security Officer oversees the implementation of security tools and processes to ensure that remote maintenance of organizational assets is approved, logged, and performed in a manner that prevents unauthorized access.

Exhibits:

- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Authentication-Tokens-Standard.pdf
- Configuration-Management-Policy.pdf
- Identification-and-Authentication-Policy.pdf
- Sanitization-Secure-Disposal-Standard.pdf
- Secure-Configuration-Standard.pdf
- Secure-System-Development-Life-Cycle-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS1.1 - Establish and Maintain Detailed Enterprise Asset Inventory	Establish and maintain an accurate, detailed, and up-to-date inventory of all enterprise assets with the potential to store or process data, to include end-user devices (including portable and mobile), network devices, non-computing/IoT devices, and servers. Ensure the inventory records the network address (if static), hardware address, machine name, enterprise asset owner, department	Fully Implemented	IT Systems

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	for each asset, and whether the asset has been approved to connect to the network. For mobile end-user devices, MDM type tools can support this process, where appropriate. This inventory includes assets connected to the infrastructure physically, virtually, remotely, and those within cloud environments. Additionally, it includes assets that are regularly connected to the enterprise's network infrastructure, even if they are not under control of the enterprise. Review and update the inventory of all enterprise assets bi-annually, or more frequently.		
CIS3.5 - Securely Dispose of Data	Securely dispose of data as outlined in the enterprise's data management process. Ensure the disposal process and method are commensurate with the data sensitivity.	Not Implemented	Data Protection

ID.IM-01 - Continuous Improvements Evaluation

ID.IM-01: Improvements are identified from evaluations.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.IM-01.01 - Continuous Improvements Evaluation.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.01: Technology, cybersecurity, and resilience controls are regularly assessed and/or tested for design and operating effectiveness.	Not Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.IM-01.02 - Continuous Improvements Evaluation.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.02: The organization implements a regular process to collect, store, report, benchmark, and assess trends in actionable performance indicators and risk metrics (e.g., threat KRIs, security incident metrics, vulnerability metrics, and operational measures).	Not Implemented	Governance
CRI.ID.IM-01.03 - Continuous Improvements Evaluation.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.03: The organization establishes specific objectives, performance criteria, benchmarks, and tolerance limits to identify areas that have improved or are in need of improvement over time.	Not Implemented	Governance
CRI.ID.IM-01.04 - Continuous Improvements Evaluation.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.04: Technology and cybersecurity programs include elements designed to assess, manage, and continually improve the quality of program delivery in addressing stakeholder requirements and risk reduction.	Not Implemented	Governance
CRI.ID.IM-01.05 - Continuous Improvements Evaluation.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.05: The organization's third-party risk management program is regularly assessed, reported on, and improved.	Not Implemented	Governance

ID.IM-02 - Tests & Exercises

ID.IM-02: Improvements are identified from security tests and exercises, including those done in coordination with suppliers and relevant third parties.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented systems and processes to ensure that all data is backed up.

This includes:

- Ensuring that all locations where data is stored are backed up
- Preventing data from being stored in locations that are not backed up
- Validating that backups are successful by testing them instead of relying on messages
- Multiple versions of backups are retained to enable access to at least 3 versions in case a document becomes corrupt
- Data is backed up to geographically-diverse locations highly unlikely to be affected by the same disruption or disaster
- Backup systems are compliant with all applicable regulations
- Unauthorized users are prevented from accessing the organization's data in a backup environment
- Backup plans are documented to comply with all applicable requirements

Incident alert thresholds must be established by the Security Officer, who will review logs, either manually or through an automated process. As a part of this review process, detection processes are tested and verified as operational in compliance with the organization's information security and risk management plans.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.7 - Conduct Routine Incident Response Exercises	Plan and conduct routine incident response exercises and scenarios for key personnel involved in the incident response process to prepare for responding to real-world incidents. Exercises need to test communication channels, decision making, and workflows. Conduct testing on an annual basis, at a minimum.	Fully Implemented	IT Security

ID.IM-03 - Improvements from Lessons Learned

ID.IM-03: Improvements are identified from execution of operational processes, procedures, and activities.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

The response and recovery plans incorporate lessons learned from incidents, and strategies updated as needed.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.IM-03.01 - Improvements from Lessons Learned.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-03.01: A formal process is in place to improve protection controls and processes by integrating recommendations, findings, and lessons learned from exercises, testing, audits, assessments, and incidents.	Fully Implemented	Governance
CRI.ID.IM-03.02 - Improvements from Lessons Learned.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-03.02: The organization establishes a systematic and comprehensive program to regularly evaluate and improve its monitoring and detection processes and controls as the threat environment changes, tools and techniques evolve, and lessons are learned.	Fully Implemented	Governance

ID.IM-04 - Plans Affecting Operations

ID.IM-04: Incident response plans and other cybersecurity plans that affect operations are established, communicated, maintained, and improved.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

The Security Officer ensures that a Business Continuity Plan has been implemented that identifies potential disruptions and disasters, defines mitigation strategies, and procedures to follow to ensure continued delivery of services and other critical functions. The Business Continuity Plan has been reviewed to ensure that all regulatory requirements have been met.

The response and recovery plans incorporate lessons learned from incidents, and strategies updated as needed.

The response and recovery plans incorporate lessons learned from incidents, and strategies updated as needed.

The Security Officer has implemented systems and processes to ensure that all data is backed up.

This includes:

- Ensuring that all locations where data is stored are backed up

• Preventing data from being stored in locations that are not backed up
• Validating that backups are successful by testing them instead of relying on messages
• Multiple versions of backups are retained to enable access to at least 3 versions in case a document becomes corrupt
• Data is backed up to geographically-diverse locations highly unlikely to be affected by the same disruption or disaster
• Backup systems are compliant with all applicable regulations
• Unauthorized users are prevented from accessing the organization’s data in a backup environment
• Backup plans are documented to comply with all applicable requirements

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.IM-04.01 - Plans Affecting Operations.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.01: The organization's business continuity, disaster recovery, crisis management, and response plans are in place and managed, aligned with each other, and incorporate considerations of cyber incidents.	Fully Implemented	Operations
CRI.ID.IM-04.02 - Plans Affecting Operations.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.02: The organization's incident response and business continuity plans contain clearly defined roles, responsibilities, and levels of decision-making authority, and include all needed areas of participation and expertise across the organization and key third-parties.	Fully Implemented	Operations
CRI.ID.IM-04.03 - Plans Affecting Operations.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.03: Recovery plans include service resumption steps for all operating environments, including traditional, alternate recovery, and highly available (e.g., cloud) infrastructures.	Fully Implemented	Operations
CRI.ID.IM-04.04 - Plans Affecting Operations.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.04: The organization has plans to identify, in a timely manner, the status of all transactions and member positions at the time of a disruption, supported by	Fully Implemented	Operations

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	corresponding recovery point objectives.		
CRI.ID.IM-04.05 - Plans Affecting Operations.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.05: Recovery plans include restoration of resilience following a long term loss of capability (e.g., at an alternate site or a third-party), detailing when the plan should be activated and implementation steps.	Fully Implemented	Operations
CRI.ID.IM-04.06 - Plans Affecting Operations.06	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.06: The organization has established and implemented plans to identify and mitigate the cyber risks it poses through interconnectedness to sector partners and external stakeholders.	Fully Implemented	Operations
CRI.ID.IM-04.07 - Plans Affecting Operations.07	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.07: The organization pre-identifies, pre-qualifies, and retains third party incident management support and forensic service firms, as required, that can be called upon to quickly assist with incident response, investigation, and recovery.	Fully Implemented	Operations
CRI.ID.IM-04.08 - Plans Affecting Operations.08	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.08: The organization regularly reviews response strategy, incident management plans, recovery plans, and associated tests and exercises and updates them, as necessary, based on: (1) Lessons learned from incidents that have occurred (both internal and external to the organization); (2) Current cyber threat intelligence (both internal and external sources); (3) Recent and wide-scale cyber attack scenarios; (4) Operationally and technically plausible future cyber attacks; (5) Organizational or technical environment changes; and,	Fully Implemented	Operations

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	(6) New technological developments.		

ID.RA-01 - Asset Vulnerability Identification

ID.RA-01: Vulnerabilities in assets are identified, validated, and recorded.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer periodically engages a qualified independent organization to conduct an accurate and thorough risk analysis that includes vulnerabilities, threats, likelihood, and impact, in accordance with all internal and external requirements.

At-risk software or devices is immediately be removed or isolated to ensure that data is fully protected, and that the organization maintains compliance with regulations and other requirements

Encryption status assessments are not performed by the organization at this time.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS7.1 - Establish and Maintain a Vulnerability Management Process	Establish and maintain a documented vulnerability management process for enterprise assets. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security

ID.RA-02 - Information Sharing Forums

ID.RA-02: Cyber threat intelligence is received from information sharing forums and sources.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented the necessary processes to access and use threat and vulnerability information is received from information sharing forums and sources as part of the organization's risk analysis process.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-02.01 - Information Sharing Forums.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-02.01: The organization participates actively (in alignment with its business operations, inherent risk, and complexity) in information-sharing groups and collectives (e.g., cross-industry, cross-government and cross-border groups) to gather, distribute and analyze information about cyber practices, cyber threats, and early warning indicators relating to cyber threats.	Fully Implemented	IT Security
CRI.ID.RA-02.02 - Information Sharing Forums.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-02.02: The organization shares authorized information on its cyber resilience framework and the effectiveness of protection technologies bilaterally with trusted external stakeholders to promote the understanding of each party’s approach to securing systems.	Fully Implemented	IT Security

ID.RA-03 - Threat Identification

ID.RA-03: Internal and external threats to the organization are identified and recorded.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The organization's risk analysis process identifies threats to the security of the organization's company data, including natural, human, and environmental threats. The risk analysis also identifies the nature of each threat or vulnerability and how each may damage information security.

The Security Officer engages a qualified independent organization to conduct an accurate and thorough risk analysis that includes vulnerabilities, threats, likelihood, and impact, in accordance with all internal and external requirements.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-03.01 - Threat Identification.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.01: The organization, on an ongoing basis, identifies, analyzes, correlates, characterizes, and reports threats that are internal and external to the firm.	Fully Implemented	IT Security
CRI.ID.RA-03.02 - Threat Identification.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.02: The organization solicits and considers threat intelligence received from the organization's stakeholders, service and utility providers, and other industry and security organizations.	Fully Implemented	IT Security
CRI.ID.RA-03.03 - Threat Identification.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.03: The organization includes in its threat analysis those cyber threats which could trigger extreme but plausible cyber events, even if they are considered unlikely to occur or have never occurred in the past.	Fully Implemented	IT Security
CRI.ID.RA-03.04 - Threat Identification.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.04: The organization regularly reviews and updates its threat analysis methodology, threat information sources, and supporting tools.	Fully Implemented	IT Security

ID.RA-04 - Impact & Likelihood Analysis

ID.RA-04: Potential impacts and likelihoods of threats exploiting vulnerabilities are identified and recorded.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-04.01 - Impact & Likelihood Analysis	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-04.01: The organization's risk assessment approach includes the analysis and characterization of the likelihood and potential business impact of identified risks being realized.	Fully Implemented	IT Security

ID.RA-05 - Risk Exposure Determination & Prioritization

ID.RA-05: Threats, vulnerabilities, likelihoods, and impacts are used to understand inherent risk and inform risk response prioritization.

Overall Assessment: **Addressed**

Assessed by: Exec Mgmt

Comments:

The organization has developed a comprehensive written plan to continue business during, or resume business immediately after, a disruption or disaster.

This plan goes beyond the tasks required to recover the organization’s IT infrastructure, and includes a Business Impact Analysis to identify the organization’s functions and the effect of critical functions

The Security Officer ensures that a Business Continuity Plan is created that identifies potential disruptions and disasters, defines mitigation strategies, and procedures to follow to ensure continued delivery of services and other critical functions.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-05.01 - Risk Exposure Determination & Prioritization.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.01: Threats, vulnerabilities, likelihoods, and impacts are used to determine overall technology, cybersecurity, and resilience risk to the organization.	Fully Implemented	Exec Mgmt
CRI.ID.RA-05.02 - Risk Exposure Determination & Prioritization.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.02: The	Fully Implemented	Exec Mgmt

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	organization has established threat modeling capabilities to identify how and why critical assets might be compromised by a threat actor, what level of protection is needed for those critical assets, and what the impact would be if that protection failed.		
CRI.ID.RA-05.03 - Risk Exposure Determination & Prioritization.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.03: The organization's business units assess, on an ongoing basis, the technology, cybersecurity, and resilience risks associated with the activities of the business unit.	Fully Implemented	Exec Mgmt
CRI.ID.RA-05.04 - Risk Exposure Determination & Prioritization.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.04: The organization uses scenario planning, table-top-exercises, or similar event analysis techniques to identify vulnerabilities and determine potential impacts to critical infrastructure, technology, and business processes.	Fully Implemented	Exec Mgmt

ID.RA-06 - Risk Response Determination

ID.RA-06: Risk responses are chosen, prioritized, planned, tracked, and communicated.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented a comprehensive risk-management program based on the results of the risk analysis. Risk remediation, reduction, sharing, or acceptance plans will be based on the organization’s regulatory requirements or tolerance for risk.

The risk-management plan clearly describes the magnitude of the risks that are to be managed to a level acceptable to all stakeholders. Incident thresholds are identified to support the Incident Response Plan.

Newly identified vulnerabilities are mitigated or documented as accepted risks by the Security Officer in accordance with the organization's security policy.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-06.01 - Risk Response Determination.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.01: Technology and cybersecurity risk management programs and risk assessment processes produce actionable recommendations that the organization uses to select, design, prioritize, implement, maintain, evaluate, and modify cybersecurity and technology controls.	Fully Implemented	IT Security
CRI.ID.RA-06.02 - Risk Response Determination.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.02: The implementation of responses to address identified risks (i.e., risk avoidance, risk mitigation, risk acceptance, or risk transfer (e.g., cyber insurance)) are formulated, assessed, documented, and prioritized based on criticality to the business.	Fully Implemented	IT Security
CRI.ID.RA-06.03 - Risk Response Determination.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.03: Technology and cybersecurity programs identify and implement controls to manage applicable risks within the risk appetite set by the governing authority (e.g., the Board or one of its committees).	Fully Implemented	IT Security
CRI.ID.RA-06.04 - Risk Response Determination.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.04: The organization assesses the threats, impacts, and risks that could adversely affect the organization's ability to provide services on an ongoing basis, and develops its resilience requirements and plans to address those risks.	Fully Implemented	IT Security
CRI.ID.RA-06.05 - Risk Response Determination.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.05: The organization defines and implements standards and procedures to prioritize and remediate issues identified	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	in vulnerability scanning or penetration testing, including emergency or zero-day threats and vulnerabilities.		
CRI.ID.RA-06.06 - Risk Response Determination.06	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.06: The organization follows documented procedures, consistent with established risk response processes, for mitigating or accepting the risk of vulnerabilities or weaknesses identified in exercises and testing or when responding to incidents.	Fully Implemented	IT Security

ID.RA-07 - Change & Exception Management

ID.RA-07: Changes and exceptions are managed, assessed for risk impact, recorded, and tracked.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The organization:
• Determines the types of changes to the information system that are configuration controlled;
• Approves configuration-controlled changes to the system with consideration for security;
• Documents approved configuration-controlled changes to the system;
• Retains and reviews records of configuration-controlled changes to the system;
• Audits activities associated with configuration-controlled changes to the system; and
• Coordinates and provides oversight for configuration change control activities through change request forms that must be approved by the Security Officer.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.ID.RA-07.01 - Change & Exception Management.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.01: The organization defines and implements change management standards and procedures, to include emergency change procedures, that explicitly address risk identified both prior to and during a change, any new risk created post-change, as well as the reviewing and	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	approving authorities (e.g., change advisory boards).		
CRI.ID.RA-07.02 - Change & Exception Management.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.02: Risk-based criteria are used to categorize each system change, to include emergency changes, to determine the necessary change process standards to apply for change planning, rollback planning, pre-change testing, change access control, post-change verification, and change review and approval.	Fully Implemented	IT Security
CRI.ID.RA-07.03 - Change & Exception Management.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.03: Technology projects and system change processes ensure that requisite changes in security posture, data classification and flows, architecture, support documentation, business processes, and business resilience plans are addressed.	Fully Implemented	IT Security
CRI.ID.RA-07.04 - Change & Exception Management.04	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.04: Policy exceptions, risk mitigation plans, and risk acceptances resulting from assessments and evaluations, such as testing, exercises, audits, etc., are formally managed, approved, escalated to defined levels of management, and tracked to closure.	Fully Implemented	IT Security
CRI.ID.RA-07.05 - Change & Exception Management.05	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.05: The organization establishes and maintains an exception management process for identified vulnerabilities that cannot be mitigated within target timeframes.	Fully Implemented	IT Security

ID.RA-08 - Vulnerability Disclosure Response

ID.RA-08: Processes for receiving, analyzing, and responding to vulnerability disclosures are established.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS7.2 - Establish and Maintain a Remediation Process	Establish and maintain a risk-based remediation strategy documented in a remediation process, with monthly, or more frequent, reviews.	Not Implemented	IT Security

ID.RA-09 - Pre-acquisition Integrity Assessment

ID.RA-09: The authenticity and integrity of hardware and software are assessed prior to acquisition and use.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Exhibits:

- System-and-Information-Integrity-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.EX.DD-04.01 - Product & Service Due Diligence.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-04.01: The organization defines and implements procedures for assessing the compatibility, security, integrity, and authenticity of externally-developed or externally-sourced applications, software, software components, and firmware before deployment and upon any major change.	Not Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.EX.DD-04.02 - Product & Service Due Diligence.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-04.02: The organization reviews and evaluates any technologies or information systems proposed to support a third party's services or activities, to include compatibility with the organization's technology and cybersecurity architectures, interactions and interfaces with existing systems, security controls, operational management and support requirements, and suitability to the task.	Not Implemented	IT Security

ID.RA-10 - Supplier Pre-Acquisition Assessments

ID.RA-10: Critical suppliers are assessed prior to acquisition.

Overall Assessment: **Not Addressed**

Assessed by: Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.EX.DD-03.01 - Technology & Cybersecurity Risk Assessment.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.01: The organization reviews, evaluates, and risk assesses a prospective critical third party's cybersecurity program, including its ability to identify, assess, monitor, and mitigate its cyber risks; the completeness of its policies and procedures; the strength of its technical and administrative controls; and the coverage of its internal and independent control testing programs.	Not Implemented	Governance
CRI.EX.DD-03.02 - Technology & Cybersecurity Risk Assessment.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.02: The organization reviews,	Not Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	evaluates, and risk assesses a prospective critical third party's business continuity program, to include business impact analyses, risk assessments, continuity plans, disaster recovery plans, technology resilience architecture, and response and recovery plans, test plans, and test results.		
CRI.EX.DD-03.03 - Technology & Cybersecurity Risk Assessment.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.03: The organization reviews, evaluates, and risk assesses a prospective critical third party's incident response program, to include monitoring and alerting capabilities, incident reporting procedures and protocols, and capabilities for event analysis, problem resolution, and forensic investigation.	Not Implemented	Governance

PR.AA-01 - Identity & Credential Management

PR.AA-01: Identities and credentials for authorized users, services, and hardware are managed by the organization.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented procedures to ensure appropriate security of devices and users. Upon hiring or otherwise being authorized to access the organization’s IT assets, written authorization must be sent to the IT department and system administrators requesting access for the user. Changes must be requested in writing.

Users must acknowledge in writing their willingness to comply with the organization’s policies and procedures.

The IT department and system administrators will provision the minimum level of access required.

Exhibits:

- Access-Control-Policy.pdf

- Account-Management-Access-Control-Standard.pdf
- Authentication-Tokens-Standard.pdf
- Configuration-Management-Policy.pdf
- Identification-and-Authentication-Policy.pdf
- Sanitization-Secure-Disposal-Standard.pdf
- Secure-System-Development-Life-Cycle-Standard.pdf
- Secure-Configuration-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS5.1 - Establish and Maintain an Inventory of Accounts	Establish and maintain an inventory of all accounts managed in the enterprise. The inventory must include both user and administrator accounts. The inventory, at a minimum, should contain the person's name, username, start/stop dates, and department. Validate that all active accounts are authorized, on a recurring schedule at a minimum quarterly, or more frequently.	Fully Implemented	IT Systems
CIS6.7 - Centralize Access Control	Centralize access control for all enterprise assets through a directory service or SSO provider, where supported.	Fully Implemented	IT Security

PR.AA-02 - Identity Binding to Credentials

PR.AA-02: Identities are proofed and bound to credentials based on the context of interactions.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.AA-02.01 - Identity Binding to Credentials	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-02.01: The organization authenticates identity, validates the authorization level of a user before granting access to its systems, limits the use of an account to a single	Not Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	individual, and attributes activities to the user in logs and transactions.		

PR.AA-03 - Authentication

PR.AA-03: Users, services, and hardware are authenticated.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer determines the appropriate tools and processes required to protect company data from loss, theft, and unauthorized access. This includes remote access mechanisms, security tools, methods of authentication, access logging, information system activity reviews, physical security of remote devices, virtual environments, and cloud-based solutions.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.AA-03.01 - Authentication.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.01: Based on the risk level of a user access or a specific transaction, the organization defines and implements authentication requirements, which may include multi-factor or out-of-band authentication, and may adopt other real-time risk prevention or mitigation tactics.	Fully Implemented	IT Security
CRI.PR.AA-03.02 - Authentication.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.02: Decisions to authorize user access to devices and other assets are made with consideration of: (1) Business need for the access; (2) The type of data being accessed (e.g., customer PII, public data); (3) The risk of the transaction (e.g., internal-to-internal, external-to-internal); (4) The organization's level of trust for the accessing agent	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	(e.g., external application, internal user); and (5) The potential for harm.		
CRI.PR.AA-03.03 - Authentication.03	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.03: The organization reduces fraudulent activity and protects reputational integrity through email verification mechanisms (e.g., DMARC, DKIM), call-back verification, secure file exchange facilities, out-of-band communications, customer outreach and education, and other tactics designed to thwart imposters and fraudsters.	Fully Implemented	IT Security

PR.AA-04 - Identity Assertions

PR.AA-04: Identity assertions are protected, conveyed, and verified.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.AA-04.01 - Identity Assertions	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-04.01: Access credential and authorization mechanisms for internal systems and across security perimeters (e.g., leveraging directory services, directory synchronization, single sign-on, federated access, credential mapping, etc.) are designed to maintain security, integrity, and authenticity.	Not Implemented	IT Security

PR.AA-05 - Access Authorizations

PR.AA-05: Access permissions, entitlements, and authorizations are defined in a policy, managed, enforced, and reviewed, and incorporate the principles of least privilege and separation of duties.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

The Security Officer has implemented procedures to ensure appropriate security of devices and users. Upon hiring or otherwise being authorized to access the organization's IT assets, written authorization must be sent to the IT department and system administrators requesting access for the user. Changes must be requested in writing.

Users must acknowledge in writing their willingness to comply with the organization's policies and procedures.

The IT department and system administrators will provision the minimum level of access required.

The Security Officer determines the appropriate tools and processes required to protect company data from loss, theft, and unauthorized access. This includes remote access mechanisms, security tools, methods of authentication, access logging, information system activity reviews, physical security of remote devices, virtual environments, and cloud-based solutions.

The Security Officer has implemented processes and tools to ensure that users are provided with the minimum level of access required to do their jobs. For example, users will only be given access to network shares and database sections with the information required for their jobs. Network shares are reviewed to ensure that sensitive, confidential, or regulated data is not mistakenly saved in locations accessible by unauthorized users. For situations where access cannot be limited, tools must be utilized to log activity. User activity is periodically reviewed to identify any access beyond the minimum required. Unauthorized activity will result in discipline.

Wherever possible, duties of security personnel and management are separated to protect the organization against a rogue employee or accidental violation of security requirements.

Exhibits:

- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Authentication-Tokens-Standard.pdf
- Configuration-Management-Policy.pdf
- Identification-and-Authentication-Policy.pdf
- Sanitization-Secure-Disposal-Standard.pdf
- Secure-Configuration-Standard.pdf
- Secure-System-Development-Life-Cycle-Standard.pdf
- Remote-Access-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.3 - Configure Data Access Control Lists	Configure data access control lists based on a user's need to know. Apply data access control lists,	Fully Implemented	Data Protection

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	also known as access permissions, to local and remote file systems, databases, and applications.		
CIS6.8 - Define and Maintain Role-Based Access Control	Define and maintain role-based access control, through determining and documenting the access rights necessary for each role within the enterprise to successfully carry out its assigned duties. Perform access control reviews of enterprise assets to validate that all privileges are authorized, on a recurring schedule at a minimum annually, or more frequently.	Fully Implemented	IT Security

PR.AA-06 - Physical Access

PR.AA-06: Physical access to assets is managed, monitored, and enforced commensurate with risk.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

The Security Officer ensures that physical access to all internal and external assets that can connect to the organization’s IT resources is controlled to ensure consistent security and compliance.

The organization controls, monitors, manages and protects communications and transmissions between information systems.

The Security Officer has established the requirements for protections such as link encryption, secure file transmission protocols, retention of files on source and destination systems, integrity validation, and restrictions for access at all levels (i.e. user/process, system, and network).

Exhibits:

- Encryption-Standard.pdf
- Information-Security-Policy.pdf
- Maintenance-Policy.pdf
- Media-Protection-Policy.pdf
- System-and-Communications-Protection-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.AA-06.01 - Physical Access.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-06.01: The organization manages, protects, and logs physical access to sensitive areas, devices, consoles, equipment, and network cabling and infrastructure.	Fully Implemented	Operations
CRI.PR.AA-06.02 - Physical Access.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-06.02: The organization manages and protects physical and visual access to sensitive information assets and physical records (e.g., session lockout, clean desk policies, printer/facsimile output trays, file cabinet/room security, document labelling, etc.)	Fully Implemented	Operations

PR.AT-01 - User Awareness & Training

PR.AT-01: Personnel are provided with awareness and training so that they possess the knowledge and skills to perform general tasks with cybersecurity risks in mind.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented a security awareness and training program for all members of the organization’s workforce, including professional staff, company partners, and management.

The training program covers:
- The definition of security (availability, integrity, confidentiality)
- Threats to security (natural, human, and environmental)
- Methods of safeguarding security
- Security features of the organization's information system and applications
- Use of major applications
- Policies on installation and configuration of software
- Controls on access to information
- Correct use of anti-malware software
- Contingency plans and disaster procedures
- Workstation policies
- Good security practices (workstation use policies)
- Security incident reporting procedures
- User ID and password policies
- Third-party stakeholders, including contractors and consultants, will receive training and/or information on the organization's security policies and procedures.

The Security Officer has implemented processes, training, and accountability reporting to ensure that personnel know their roles and order of operations when a response is needed.

Exhibits:

- Acceptable-Use-of-Information-Technology-Resources-Policy.pdf
- Information-Security-Policy.pdf
- Personnel-Security-Policy.pdf
- Physical-and-Environmental-Protection-Policy.pdf
- Security-Awareness-and-Training-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS14.1 - Establish and Maintain a Security Awareness Program	Establish and maintain a security awareness program. The purpose of a security awareness program is to educate the enterprise's workforce on how to interact with enterprise assets and data in a secure manner. Conduct training at hire and, at a minimum, annually. Review and update content annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security

PR.AT-02 - Specialized Role Awareness & Training

PR.AT-02: Individuals in specialized roles are provided with awareness and training so that they possess the knowledge and skills to perform relevant tasks with cybersecurity risks in mind.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer has implemented a security awareness and training program for all members of the organization's workforce, including professional staff, company partners, and management.

The training program covers:
- Privileged user access to organizational systems and their roles and responsibilities.
- The definition of security (availability, integrity, confidentiality)
- Threats to security (natural, human, and environmental)
- Methods of safeguarding security
- Security features of the organization's information system and applications
- Use of major applications
- Policies on installation and configuration of software

- Controls on access to information
- Correct use of anti-malware software
- Contingency plans and disaster procedures
- Workstation policies
- Good security practices (workstation use policies)
- Security incident reporting procedures
- User ID and password policies
- Third-party stakeholders, including contractors and consultants, will receive training and/or information on the organization's security policies and procedures.

The Security Officer has implemented processes, training, and accountability reporting to ensure that personnel know their roles and order of operations when a response is needed.

The Security Officer has developed a training program that meets the organization’s needs and works with HR and other stakeholders to ensure that all workforce members and applicable third parties receive initial and ongoing training. To ensure continued vigilance, training must be supplemented with an awareness program that includes reminders during meetings, plus signage, e-mails, and other communications.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS14.9 - Conduct Role-Specific Security Awareness and Skills Training	Conduct role-specific security awareness and skills training. Example implementations include secure system administration courses for IT professionals, OWASP® Top 10 vulnerability awareness and prevention training for web application developers, and advanced social engineering awareness training for high-profile roles.	Fully Implemented	IT Security

PR.DS-01 - Protection of Data at Rest

PR.DS-01: The confidentiality, integrity, and availability of data-at-rest are protected.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

When provisioned by the IT department and system administrators, all users will be set up with Unique User Identification. Periodic audits of access logs is conducted, and access is verified with randomly selected or targeted users. Third parties are also reviewed to ensure that individual users can be identified.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Encryption-Standard.pdf
- Incident-Response-Policy.pdf
- Maintenance-Policy.pdf
- Information-Security-Policy.pdf
- Media-Protection-Policy.pdf
- Mobile-Device-Security.pdf
- Patch-Management-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.11 - Encrypt Sensitive Data at Rest	Encrypt sensitive data at rest on servers, applications, and databases containing sensitive data. Storage-layer encryption, also known as server-side encryption, meets the minimum requirement of this Safeguard. Additional encryption methods may include application-layer encryption, also known as client-side encryption, where access to the data storage device(s) does not permit access to the plain-text data.	Fully Implemented	Data Protection

PR.DS-02 - Protection of Data in Transit

PR.DS-02: The confidentiality, integrity, and availability of data-in-transit are protected.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

The Security Officer determines the appropriate tools and processes required to protect company data from loss, theft, and unauthorized access while data is in transit. This includes remote access mechanisms, security tools, methods of authentication, access logging, information system activity reviews, physical security of remote devices, virtual environments, and cloud-based solutions.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Encryption-Standard.pdf
- Incident-Response-Policy.pdf
- Information-Security-Policy.pdf
- Maintenance-Policy.pdf

- Media-Protection-Policy.pdf
- Mobile-Device-Security.pdf
- Patch-Management-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.10 - Encrypt Sensitive Data in Transit	Encrypt sensitive data in transit. Example implementations can include: Transport Layer Security (TLS) and Open Secure Shell (OpenSSH).	Fully Implemented	Data Protection

PR.DS-10 - Protection of Data in Use

PR.DS-10: The confidentiality, integrity, and availability of data-in-use are protected.

Overall Assessment: **Addressed**

Assessed by: Data Protection

Comments:

The Security Officer plans to implement systems and processes to ensure that data leaks are prevented according to the organization’s policies.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.DS-10.01 - Protection of Data in Use	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.DS-10.01: Data-in-use is protected commensurate with the criticality and sensitivity of the information and in alignment with the data classification and protection policy (e.g., through the use of encryption, authentication, access control, masking, tokenization, visual shielding, memory integrity monitoring, etc.)	Fully Implemented	Data Protection

PR.DS-11 - Data Backup

PR.DS-11: Backups of data are created, protected, maintained, and tested.

Overall Assessment: **Not Addressed**

Assessed by: Data Protection

Comments:

Yes - Partially

The Security Officer has implemented systems and processes to ensure that all data is backed up.

During a recent review of these processes, it was identified that the backups related to Cloud Services provided by third parties meet the requirements necessary to restore critical functions after an incident.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Encryption-Standard.pdf
- Incident-Response-Policy.pdf
- Information-Security-Policy.pdf
- Maintenance-Policy.pdf
- Media-Protection-Policy.pdf
- Mobile-Device-Security.pdf
- Patch-Management-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS11.2 - Perform Automated Backups	Perform automated backups of in-scope enterprise assets. Run backups weekly, or more frequently, based on the sensitivity of the data.	Not Implemented	IT Systems
CIS11.3 - Protect Recovery Data	Protect recovery data with equivalent controls to the original data. Reference encryption or data separation, based on requirements.	Fully Implemented	IT Security
CIS11.5 - Test Data Recovery	Test backup recovery quarterly, or more frequently, for a sampling of in-scope enterprise assets.	Fully Implemented	IT Systems

PR.IR-01 - Logical Access Protections

PR.IR-01: Networks and environments are protected from unauthorized logical access and usage.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer determines the appropriate tools and processes required to protect company data from loss, theft, and unauthorized access. This includes remote access mechanisms, security tools, methods of authentication, access logging, information system activity reviews, physical security of remote devices, virtual environments, and cloud-based solutions.

The Security Officer is in the process of assessing the requirements that must be met to create a separate development and testing environment(s) according to the organization’s policies.

The organization controls, monitors, manages and protects communications and transmissions between information systems.

The Security Officer has established the requirements for protections such as link encryption, secure file transmission protocols, retention of files on source and destination systems, integrity validation, and restrictions for access at all levels (i.e. user/process, system, and network).

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS3.12 - Segment Data Processing and Storage Based on Sensitivity	Segment data processing and storage based on the sensitivity of the data. Do not process sensitive data on enterprise assets intended for lower sensitivity data.	Fully Implemented	IT Security
CIS12.2 - Establish and Maintain a Secure Network Architecture	Establish and maintain a secure network architecture. A secure network architecture must address segmentation, least privilege, and availability, at a minimum.	Fully Implemented	IT Security

PR.IR-02 - Environmental Threat Protections

PR.IR-02: The organization's technology assets are protected from environmental threats.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

workforce members and contractors to physically access the organization’s electronic information

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.IR-02.01 - Environmental Threat Protections	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-02.01: The organization designs,	Fully Implemented	Operations

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	documents, implements, tests, and maintains environmental and physical controls to meet defined business resilience requirements (e.g., environmental monitoring, dual power and communication sources, regionally separated backup processing facilities, etc.)		

PR.IR-03 - Resilience Measures

PR.IR-03: Mechanisms are implemented to achieve resilience requirements in normal and adverse situations.

Overall Assessment: **Not Addressed**

Assessed by: Operations

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.IR-03.01 - Resilience Measures	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-03.01: The organization implements mechanisms (e.g., failsafe, load balancing, hot swaps, redundant equipment, alternate services, backup facilities, etc.) to achieve resilience requirements in normal and adverse situations.	Not Implemented	Operations

PR.IR-04 - Capacity Management

PR.IR-04: Adequate resource capacity to ensure availability is maintained.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

The Security Officer plans to identify and oversee the implementation of systems and processes to ensure that availability is maintained by ensuring adequate capacity according to the organization’s policies.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.PR.IR-04.01 - Capacity Management.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-04.01: Baseline measures of network and system utilization and transaction activity are captured to support capacity planning and anomalous activity detection.	Fully Implemented	Operations
CRI.PR.IR-04.02 - Capacity Management.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-04.02: Technology availability and capacity is planned, monitored, managed, and optimized to meet business resilience objectives and reasonably anticipated infrastructure demands.	Fully Implemented	Operations

PR.PS-01 - Configuration Management

PR.PS-01: Configuration management practices are established and applied.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer develops and communicates baseline configurations and a written System Development Life Cycle to ensure that all devices and services provide an adequate level of security to meet the needs of the organization. The life cycle takes into consideration performance, security, and the needs of the organization to remain competitive in its markets.

The organization:
• Determines the types of changes to the information system that are configuration controlled;
• Approves configuration-controlled changes to the system with consideration for security;
• Documents approved configuration-controlled changes to the system;

The Security Officer has implemented security tools and processes to ensure the security of removable media.

The Security Officer and system administrators oversee the implementation of security tools and processes to ensure the concept of least functionality.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS4.1 - Establish and Maintain a Secure Configuration Process	Establish and maintain a secure configuration process for enterprise assets (end-user devices, including portable and mobile, non-computing/IoT devices, and servers) and software (operating systems and applications). Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security
CIS4.2 - Establish and Maintain a Secure Configuration Process for Network Infrastructure	Establish and maintain a secure configuration process for network devices. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security

PR.PS-02 - Software Maintenance & Replacement

PR.PS-02: Software is maintained, replaced, and removed commensurate with risk.

Overall Assessment: **Addressed**

Assessed by: IT Systems

Comments:

At-risk software or devices is immediately be removed or isolated to ensure that data is fully protected, and that the organization maintains compliance with regulations and other requirements

Encryption status assessments are not performed by the organization at this time.

The Security Officer oversees the implementation of security tools and processes to ensure that remote maintenance of organizational assets is approved, logged, and performed in a manner that prevents unauthorized access.

Exhibits:

- Maintenance-Policy.pdf
- Remote-Access-Standard.pdf
- Security-Logging-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS2.2 - Ensure Authorized Software is Currently Supported	Ensure that only currently supported software is designated as authorized in the software inventory for enterprise assets. If software is unsupported, yet necessary for the fulfillment of the enterprise's mission, document an exception detailing mitigating controls and residual risk acceptance. For any unsupported software without an exception documentation, designate as unauthorized. Review the software list to verify software support at least monthly, or more frequently.	Fully Implemented	IT Systems
CIS2.3 - Address Unauthorized Software	Ensure that unauthorized software is either removed from use on enterprise assets or receives a documented exception. Review monthly, or more frequently.	Fully Implemented	IT Systems

PR.PS-03 - Hardware Maintenance

PR.PS-03: Hardware is maintained, replaced, and removed commensurate with risk.

Overall Assessment: **Addressed**

Assessed by: IT Systems

Comments:

The Security Officer oversees appropriate maintenance support, including contractual service level agreements, to ensure that security is maintained according to the organization's policies.

The Security Officer plans to implement controls and audit practices to prevent the removal of data, including controls to prevent e-mailing or storing data on removable media.

Exhibits:

- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Authentication-Tokens-Standard.pdf
- Configuration-Management-Policy.pdf
- Identification-and-Authentication-Policy.pdf
- Sanitization-Secure-Disposal-Standard.pdf
- Secure-Configuration-Standard.pdf

- Secure-System-Development-Life-Cycle-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS1.2 - Address Unauthorized Assets	Ensure that a process exists to address unauthorized assets on a weekly basis. The enterprise may choose to remove the asset from the network, deny the asset from connecting remotely to the network, or quarantine the asset.	Fully Implemented	IT Systems

PR.PS-04 - Log Record Generation

PR.PS-04: Log records are generated and made available for continuous monitoring.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The organization enables logging on all systems that offer the feature, including domain controllers, firewalls, and application programs. Logs are maintained for six years.
• Logs are reviewed at least every calendar quarter by the Security Officer or his/her designee.
• Log reviews are documented by a work ticket which will be maintained for six years.
• Logs are to be provided to investigators, including law enforcement, to assist with incident response.

Exhibits:

- Access-Control-Policy.pdf
- Account-Management-Access-Control-Standard.pdf
- Authentication-Tokens-Standard.pdf
- Configuration-Management-Policy.pdf
- Identification-and-Authentication-Policy.pdf
- Sanitization-Secure-Disposal-Standard.pdf
- Secure-Configuration-Standard.pdf
- Secure-System-Development-Life-Cycle-Standard.pdf
- Security-Logging-Standard.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS8.2 - Collect Audit Logs	Collect audit logs. Ensure that logging, per the enterprise's audit log management process, has been enabled across enterprise assets.	Fully Implemented	IT Security

PR.PS-05 - Unauthorized Software Installation & Execution

PR.PS-05: Installation and execution of unauthorized software are prevented.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS2.5 - Allowlist Authorized Software	Use technical controls, such as application allowlisting, to ensure that only authorized software can execute or be accessed. Reassess bi-annually, or more frequently.	Fully Implemented	IT Security

PR.PS-06 - Secure Systems Development Practices

PR.PS-06: Secure software development practices are integrated, and their performance is monitored throughout the software development life cycle.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS16.1 - Establish and Maintain a Secure Application Development Process	Establish and maintain a secure application development process. In the process, address such items as: secure application design standards, secure coding practices, developer training, vulnerability management, security of third-party code, and	Not Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	application security testing procedures. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.		

RC.CO-03 - Recovery Activity Communication

RC.CO-03: Recovery activities and progress in restoring operational capabilities are communicated to designated internal and external stakeholders.

Overall Assessment: **Addressed**

Assessed by: Governance Dept

Comments:

In response to an incident, recovery activities are communicated to internal stakeholders and executive and management teams.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.CO-03.01 - Recovery Activity Communication.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.CO-03.01: The organization timely involves and communicates the recovery activities, procedures, cyber risk management issues to the governing body (e.g., the Board or one of its committees), senior management, incident management support teams, and relevant internal stakeholders.	Fully Implemented	Governance
CRI.RC.CO-03.02 - Recovery Activity Communication.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.CO-03.02: The organization promptly communicates the status of recovery activities to regulatory authorities and relevant external	Fully Implemented	Governance

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	stakeholders, as required or appropriate.		

RC.CO-04 - Public Information Sharing

RC.CO-04: Public updates on incident recovery are shared using approved methods and messaging.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

For all incidents, public relations is managed based on the advice of legal counsel and insurance providers to ensure that the organization’s reputation is repaired.

Recovery activities are communicated to internal stakeholders and executive and management teams.

The organization identifies internal and external resources to protect its reputation and communicate recovery activities.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.2 - Establish and Maintain Contact Information for Reporting Security Incidents	Establish and maintain contact information for parties that need to be informed of security incidents. Contacts may include internal staff, third-party vendors, law enforcement, cyber insurance providers, relevant government agencies, Information Sharing and Analysis Center (ISAC) partners, or other stakeholders. Verify contacts annually to ensure that information is up-to-date.	Fully Implemented	IT Security
CIS17.6 - Define Mechanisms for Communicating During Incident Response	Determine which primary and secondary mechanisms will be used to communicate and report	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	during a security incident. Mechanisms can include phone calls, emails, or letters. Keep in mind that certain mechanisms, such as emails, can be affected during a security incident. Review annually, or when significant enterprise changes occur that could impact this Safeguard.		

RC.RP-01 - Recovery Plan Execution

RC.RP-01: The recovery portion of the incident response plan is executed once initiated from the incident response process.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

Response plans (Incident Response and Business Continuity) and recovery plans (Incident Recovery and Disaster Recovery) are in place and managed. As a part of the incident response review process, it is verified that any required recovery plans have been executed.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Contingency-Planning-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.RP-01.01 - Recovery Plan Execution	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-01.01: The organization executes its recovery plans, including incident recovery, disaster recovery, and business continuity plans, during or after an incident to resume operations.	Fully Implemented	Operations

RC.RP-02 - Recovery Action Performance

RC.RP-02: Recovery actions are selected, scoped, prioritized, and performed.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

Response plans (Incident Response and Business Continuity) and recovery plans (Incident Recovery and Disaster Recovery) are in place and managed. As a part of the incident response review process, it is verified that any required recovery plans have been executed.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Contingency-Planning-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.RP-02.01 - Recovery Action Performance.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-02.01: The organization's response plans are used as informed guidance to develop and manage task plans, response actions, priorities, and assignments for responding to incidents, but are adapted as necessary to address incident-specific characteristics.	Fully Implemented	Operations
CRI.RC.RP-02.02 - Recovery Action Performance.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-02.02: Recovery plans are executed by first resuming critical services and core business functions, while minimizing any potential concurrent and widespread interruptions to interconnected entities and critical infrastructure, such as energy and telecommunications.	Fully Implemented	Operations

RC.RP-03 - Backup & Restoration Asset Integrity

RC.RP-03: The integrity of backups and other restoration assets is verified before using them for restoration.

Overall Assessment: **Addressed**

Assessed by: Operations

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS11.5 - Test Data Recovery	Test backup recovery quarterly, or more frequently, for a sampling of in-scope enterprise assets.	Fully Implemented	IT Systems

RC.RP-04 - Post-Incident Operational Norms

RC.RP-04: Critical mission functions and cybersecurity risk management are considered to establish post-incident operational norms.

Overall Assessment: **Addressed**

Assessed by: Exec Mgmt, Governance Dept

Comments:

In response to an incident, recovery activities are communicated to internal stakeholders and executive and management teams.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.RP-04.01 - Post-Incident Operational Norms	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-04.01: Restoration steps include the verification of data integrity, transaction positions, system functionality, and the operation of security controls by appropriate organizational stakeholders and system owners.	Fully Implemented	Operations

RC.RP-05 - Asset Integrity Restoration

RC.RP-05: The integrity of restored assets is verified, systems and services are restored, and normal operating status is confirmed.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.RP-05.01 - Asset Integrity Restoration.01	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-05.01: The organization maintains documented procedures for sanitizing, testing, authorizing, and returning systems to service following an incident or investigation.	Not Implemented	IT Security
CRI.RC.RP-05.02 - Asset Integrity Restoration.02	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-05.02: Business, technology, cybersecurity, and relevant third-party stakeholders confirm that systems, data, and services have been returned to functional and secure states and that a stable operational status has been achieved.	Not Implemented	IT Security

RC.RP-06 - End-of-Incident Determination

RC.RP-06: The end of incident recovery is declared based on criteria, and incident-related documentation is completed.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RC.RP-06.01 - End-of-Incident Determination	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-06.01: Incident management activities are closed under defined conditions and documentation to support subsequent post-mortem	Not Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	review, process improvement, and any follow-on activities is collected and verified.		

RS.AN-03 - Incident Analysis & Root Cause Determination

RS.AN-03: Analysis is performed to establish what has taken place during an incident and the root cause of the incident.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer must investigate security incidents and determine:
1. Whether a breach of security has occurred
2. The appropriate actions to take to repair any damage or potential damage to security that the incident might have caused
3. Incident forensics are performed by certified forensic experts.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.8 - Conduct Post-Incident Reviews	Conduct post-incident reviews. Post-incident reviews help prevent incident recurrence through identifying lessons learned and follow-up action.	Fully Implemented	IT Security

RS.AN-06 - Investigation Documentation

RS.AN-06: Actions performed during an investigation are recorded, and the records' integrity and provenance are preserved.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer must investigate security incidents and determine:
1. Whether a breach of security has occurred

2. The appropriate actions to take to repair any damage or potential damage to security that the incident might have caused
3. Incident forensics are performed by certified forensic experts.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.AN-06.01 - Investigation Documentation	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-06.01: The organization establishes a risk-based approach and procedures for quarantining systems, conducting investigations, and collecting and preserving evidence per best practices and forensic standards.	Fully Implemented	IT Security

RS.AN-07 - Incident Data Collection & Preservation

RS.AN-07: Incident data and metadata are collected, and their integrity and provenance are preserved.

Overall Assessment: **Not Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.AN-07.01 - Incident Data Collection & Preservation	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-07.01: Incident-related forensic data is captured, secured, and preserved in a manner supporting integrity, provenance, and evidentiary value.	Not Implemented	IT Security

RS.AN-08 - Incident Magnitude Determination

RS.AN-08: An incident's magnitude is estimated and validated.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.AN-08.01 - Incident Magnitude Determination	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-08.01: Available incident information is assessed to determine the extent of impact to the organization and its stakeholders, the potential near- and long-term financial implications, and whether or not the incident constitutes a material event.	Fully Implemented	IT Security

RS.CO-02 - Stakeholder Incident Notification

RS.CO-02: Internal and external stakeholders are notified of incidents.

Overall Assessment: **Addressed**

Assessed by: Exec Mgmt, Governance Dept

Comments:

Response activities are coordinated with internal and external stakeholders, as appropriate, to include external support from law enforcement agencies.

In response to an incident, recovery activities are communicated to internal stakeholders and executive and management teams.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.2 - Establish and Maintain Contact Information for Reporting Security Incidents	Establish and maintain contact information for parties that need to be informed of security incidents. Contacts may include internal staff, third-party vendors, law enforcement, cyber insurance providers,	Fully Implemented	IT Security

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
	relevant government agencies, Information Sharing and Analysis Center (ISAC) partners, or other stakeholders. Verify contacts annually to ensure that information is up-to-date.		

RS.CO-03 - Stakeholder Incident Information Sharing

RS.CO-03: Information is shared with designated internal and external stakeholders.

Overall Assessment: **Addressed**

Assessed by: Exec Mgmt, Governance Dept

Comments:

In response to an incident, recovery activities are communicated to internal stakeholders and executive and management teams.

Response activities are coordinated with internal and external stakeholders, as appropriate, to include external support from law enforcement agencies.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.2 - Establish and Maintain Contact Information for Reporting Security Incidents	Establish and maintain contact information for parties that need to be informed of security incidents. Contacts may include internal staff, third-party vendors, law enforcement, cyber insurance providers, relevant government agencies, Information Sharing and Analysis Center (ISAC) partners, or other stakeholders. Verify contacts annually to ensure that information is up-to-date.	Fully Implemented	IT Security

RS.MA-01 - Response Plan Execution

RS.MA-01: The incident response plan is executed in coordination with relevant third parties once an incident is declared.

Overall Assessment: **Addressed**

Assessed by: Exec Mgmt, Governance Dept

Comments:

The Security Officer oversees the implementation of Security Incident Response and Recovery Plans, conducts tests of critical processes at least annually, and conducts reviews with key stakeholders at least annually to ensure that security is maintained according to the organization’s policies

Events are confidentially reported to management and key stakeholders, including legal counsel and insurance provider. Based on advice of legal counsel and insurance provider, information should be with external stakeholders to achieve broader cybersecurity situational awareness.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf
- Planning-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.4 - Establish and Maintain an Incident Response Process	Establish and maintain an incident response process that addresses roles and responsibilities, compliance requirements, and a communication plan. Review annually, or when significant enterprise changes occur that could impact this Safeguard.	Fully Implemented	IT Security

RS.MA-02 - Incident Triage & Validation

RS.MA-02: Incident reports are triaged and validated.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer investigates security incidents and determine:

1. Whether a breach of security has occurred

2. The appropriate actions to take to repair any damage or potential damage to security that the incident might have caused

3. Impact on critical business systems and processes along with organizational regulatory compliance requirements.

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.MA-02.01 - Incident Triage & Validation	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-02.01: Tools and processes are in place to ensure timely detection, inspection, assessment, and analysis of security event data for reliable activation of incident response processes.	Fully Implemented	IT Security

RS.MA-03 - Incident Categorization & Prioritization

RS.MA-03: Incidents are categorized and prioritized.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The organization intends to implement a process to categorize incidents based on the guidance provided in the NIST SP 800-53 requirement outlined below:

CP-2: Contingency Plan

IR-4: Incident Handling

IR-5: Incident Monitoring

IR-8: Incident Response Plan

RA-3: Risk Assessment

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.MA-03.01 - Incident Categorization & Prioritization	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-03.01: The organization categorizes and prioritizes cybersecurity incident response consistent with response plans and criticality of systems and services to the enterprise.	Fully Implemented	IT Security

RS.MA-04 - Incident Escalation

RS.MA-04: Incidents are escalated or elevated as needed.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

Detected events are analyzed to understand attack targets and methods. Event data is aggregated and correlated from multiple sources and sensors. Impact of events is determined.

Events are confidentially reported to management and key stakeholders, including legal counsel and insurance provider. Based on advice of legal counsel and insurance provider, information should be with external stakeholders to achieve broader cybersecurity situational awareness.

Exhibits:

- Computer-Security-Threat-Response-Policy.pdf
- Cyber-Incident-Response-Standard.pdf
- Incident-Response-Policy.pdf

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.MA-04.01 - Incident Escalation	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-04.01: Response activities are centrally coordinated, response progress and milestones are tracked and documented, and new incident information is assimilated into ongoing tasks, assignments, and escalations.	Fully Implemented	IT Security

RS.MA-05 - Recovery Initiation

RS.MA-05: The criteria for initiating incident recovery are applied.

Overall Assessment: **Not Addressed**

Assessed by: Exec Mgmt, Governance Dept

Comments:

No comments.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CIS17.9 - Establish and Maintain Security Incident Thresholds	Establish and maintain security incident thresholds, including, at a minimum, differentiating between an incident and an event. Examples can include: abnormal activity, security vulnerability, security weakness, data breach, privacy incident, etc. Review annually, or when significant enterprise changes occur that could impact this Safeguard.	Not Implemented	IT Security

RS.MI-01 - Incident Containment

RS.MI-01: Incidents are contained.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

The Security Officer investigates security incidents and determine:
1. Whether a breach of security has occurred
2. The appropriate actions to take to repair any damage or potential damage to security that the incident might have caused
3. Contain incidents to minimize organizational impact

The Security Officer ensures that actions needed to repair any damage caused or potentially caused by a security incident are taken.

The Security Officer documents the report of a security incident, the findings of the investigation, and any actions taken in response to those findings.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.MI-01.01 - Incident Containment	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MI-01.01: The organization has established processes to implement vulnerability mitigation plans, involve third-party partners and outside expertise as needed, and contain incidents in a timely manner.	Fully Implemented	IT Security

RS.MI-02 - Incident Eradication

RS.MI-02: Incidents are eradicated.

Overall Assessment: **Addressed**

Assessed by: IT Security

Comments:

Incidents are contained and mitigated. Newly identified vulnerabilities are mitigated or documented as accepted risks by the Security Officer.

Internal Controls

CONTROL	DESCRIPTION	IMPLEMENTATION STATUS	ASSESSED BY
CRI.RS.MI-02.01 - Incident Eradication	NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MI-02.01: Targeted investigations and actions are taken to ensure that all vulnerabilities, system components, devices, or remnants used or leveraged in an attack (e.g., malware, compromised accounts, open ports, etc.) are removed or otherwise returned to a secure and reliable state, or that plans to address the vulnerabilities are documented.	Fully Implemented	IT Security

4 - Internal Controls

CIS1.1 - Establish and Maintain Detailed Enterprise Asset Inventory

Establish and maintain an accurate, detailed, and up-to-date inventory of all enterprise assets with the potential to store or process data, to include: end-user devices (including portable and mobile), network devices, non-computing/IoT devices, and servers. Ensure the inventory records the network address (if static), hardware address, machine name, enterprise asset owner, department for each asset, and whether the asset has been approved to connect to the network. For mobile end-user devices, MDM type tools can support this process, where appropriate. This inventory includes assets connected to the infrastructure physically, virtually, remotely, and those within cloud environments. Additionally, it includes assets that are regularly connected to the enterprise's network infrastructure, even if they are not under control of the enterprise. Review and update the inventory of all enterprise assets bi-annually, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS1.2 - Address Unauthorized Assets

Ensure that a process exists to address unauthorized assets on a weekly basis. The enterprise may choose to remove the asset from the network, deny the asset from connecting remotely to the network, or quarantine the asset.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS2.1 - Establish and Maintain a Software Inventory

Establish and maintain a detailed inventory of all licensed software installed on enterprise assets. The software inventory must document the title, publisher, initial install/use date, and business purpose for each entry; where appropriate, include the Uniform Resource Locator (URL), app store(s), version(s), deployment mechanism, and decommission date. Review and update the software inventory bi-annually, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS2.2 - Ensure Authorized Software is Currently Supported

Ensure that only currently supported software is designated as authorized in the software inventory for enterprise assets. If software is unsupported, yet necessary for the fulfillment of the enterprise's mission, document an exception detailing mitigating controls and residual risk acceptance. For any unsupported software without an exception documentation, designate as unauthorized. Review the software list to verify software support at least monthly, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS2.3 - Address Unauthorized Software

Ensure that unauthorized software is either removed from use on enterprise assets or receives a documented exception. Review monthly, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS2.5 - Allowlist Authorized Software

Use technical controls, such as application allowlisting, to ensure that only authorized software can execute or be accessed. Reassess bi-annually, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.2 - Establish and Maintain a Data Inventory

Establish and maintain a data inventory, based on the enterprise's data management process. Inventory sensitive data, at a minimum. Review and update inventory annually, at a minimum, with a priority on sensitive data.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.3 - Configure Data Access Control Lists

Configure data access control lists based on a user's need to know. Apply data access control lists, also known as access permissions, to local and remote file systems, databases, and applications.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.5 - Securely Dispose of Data

Securely dispose of data as outlined in the enterprise's data management process. Ensure the disposal process and method are commensurate with the data sensitivity.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CIS3.7 - Establish and Maintain a Data Classification Scheme

Establish and maintain an overall data classification scheme for the enterprise. Enterprises may use labels, such as "Sensitive," "Confidential," and "Public," and classify their data according to those labels. Review and update the classification scheme annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.8 - Document Data Flows

Document data flows. Data flow documentation includes service provider data flows and should be based on the enterprise's data management process. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.10 - Encrypt Sensitive Data in Transit

Encrypt sensitive data in transit. Example implementations can include: Transport Layer Security (TLS) and Open Secure Shell (OpenSSH).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.11 - Encrypt Sensitive Data at Rest

Encrypt sensitive data at rest on servers, applications, and databases containing sensitive data. Storage-layer encryption, also known as server-side encryption, meets the minimum requirement of this Safeguard. Additional encryption methods may include application-layer encryption, also known as client-side encryption, where access to the data storage device(s) does not permit access to the plain-text data.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS3.12 - Segment Data Processing and Storage Based on Sensitivity

Segment data processing and storage based on the sensitivity of the data. Do not process sensitive data on enterprise assets intended for lower sensitivity data.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS4.1 - Establish and Maintain a Secure Configuration Process

Establish and maintain a secure configuration process for enterprise assets (end-user devices, including portable and mobile, non-computing/IoT devices, and servers) and software (operating systems and applications). Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS4.2 - Establish and Maintain a Secure Configuration Process for Network Infrastructure

Establish and maintain a secure configuration process for network devices. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS5.1 - Establish and Maintain an Inventory of Accounts

Establish and maintain an inventory of all accounts managed in the enterprise. The inventory must include both user and administrator accounts. The inventory, at a minimum, should contain the person’s name, username, start/stop dates, and department. Validate that all active accounts are authorized, on a recurring schedule at a minimum quarterly, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS6.1 - Establish an Access Granting Process

Establish and follow a process, preferably automated, for granting access to enterprise assets upon new hire, rights grant, or role change of a user.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS6.2 - Establish an Access Revoking Process

Establish and follow a process, preferably automated, for revoking access to enterprise assets, through disabling accounts immediately upon termination, rights revocation, or role change of a user. Disabling accounts, instead of deleting accounts, may be necessary to preserve audit trails.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS6.7 - Centralize Access Control

Centralize access control for all enterprise assets through a directory service or SSO provider, where supported.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS6.8 - Define and Maintain Role-Based Access Control

Define and maintain role-based access control, through determining and documenting the access rights necessary for each role within the enterprise to successfully carry out its assigned duties. Perform access control reviews of enterprise assets to validate that all privileges are authorized, on a recurring schedule at a minimum annually, or more frequently.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS7.1 - Establish and Maintain a Vulnerability Management Process

Establish and maintain a documented vulnerability management process for enterprise assets. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS7.2 - Establish and Maintain a Remediation Process

Establish and maintain a risk-based remediation strategy documented in a remediation process, with monthly, or more frequent, reviews.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CIS8.2 - Collect Audit Logs

Collect audit logs. Ensure that logging, per the enterprise’s audit log management process, has been enabled across enterprise assets.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS8.11 - Conduct Audit Log Reviews

Conduct reviews of audit logs to detect anomalies or abnormal events that could indicate a potential threat. Conduct reviews on a weekly, or more frequent, basis.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS10.1 - Deploy and Maintain Anti-Malware Software

Deploy and maintain anti-malware software on all enterprise assets.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS10.7 - Use Behavior-Based Anti-Malware Software

Use behavior-based anti-malware software.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS11.2 - Perform Automated Backups

Perform automated backups of in-scope enterprise assets. Run backups weekly, or more frequently, based on the sensitivity of the data.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CIS11.3 - Protect Recovery Data

Protect recovery data with equivalent controls to the original data. Reference encryption or data separation, based on requirements.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS11.5 - Test Data Recovery

Test backup recovery quarterly, or more frequently, for a sampling of in-scope enterprise assets.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS12.2 - Establish and Maintain a Secure Network Architecture

Establish and maintain a secure network architecture. A secure network architecture must address segmentation, least privilege, and availability, at a minimum.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS13.1 - Centralize Security Event Alerting

Centralize security event alerting across enterprise assets for log correlation and analysis. Best practice implementation requires the use of a SIEM, which includes vendor-defined event correlation alerts. A log analytics platform configured with security-relevant correlation alerts also satisfies this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS14.1 - Establish and Maintain a Security Awareness Program

Establish and maintain a security awareness program. The purpose of a security awareness program is to educate the enterprise’s workforce on how to interact with enterprise assets and data in a secure manner. Conduct training at hire and, at a minimum, annually. Review and update content annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS14.9 - Conduct Role-Specific Security Awareness and Skills Training

Conduct role-specific security awareness and skills training. Example implementations include secure system administration courses for IT professionals, OWASP® Top 10 vulnerability awareness and prevention training for web application developers, and advanced social engineering awareness training for high-profile roles.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.1 - Establish and Maintain an Inventory of Service Providers

Establish and maintain an inventory of service providers. The inventory is to list all known service providers, include classification(s), and designate an enterprise contact for each service provider. Review and update the inventory annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.2 - Establish and Maintain a Service Provider Management Policy

Establish and maintain a service provider management policy. Ensure the policy addresses the classification, inventory, assessment, monitoring, and decommissioning of service providers. Review and update the policy annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.3 - Classify Service Providers

Classify service providers. Classification consideration may include one or more characteristics, such as data sensitivity, data volume, availability requirements, applicable regulations, inherent risk, and mitigated risk. Update and review classifications annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CIS15.4 - Ensure Service Provider Contracts Include Security Requirements

Ensure service provider contracts include security requirements. Example requirements may include minimum security program requirements, security incident and/or data breach notification and response, data encryption requirements, and data disposal commitments. These security requirements must be consistent with the enterprise's service provider management policy. Review service provider contracts annually to ensure contracts are not missing security requirements.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.5 - Assess Service Providers

Assess service providers consistent with the enterprise's service provider management policy. Assessment scope may vary based on classification(s), and may include review of standardized assessment reports, such as Service Organization Control 2 (SOC 2) and Payment Card Industry (PCI) Attestation of Compliance (AoC), customized questionnaires, or other appropriately rigorous processes. Reassess service providers annually, at a minimum, or with new and renewed contracts.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.6 - Monitor Service Providers

Monitor service providers consistent with the enterprise’s service provider management policy. Monitoring may include periodic reassessment of service provider compliance, monitoring service provider release notes, and dark web monitoring.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS15.7 - Securely Decommission Service Providers

Securely decommission service providers. Example considerations include user and service account deactivation, termination of data flows, and secure disposal of enterprise data within service provider systems.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS16.1 - Establish and Maintain a Secure Application Development Process

Establish and maintain a secure application development process. In the process, address such items as: secure application design standards, secure coding practices, developer training, vulnerability management, security of third-party code, and application security testing procedures. Review and update documentation annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CIS17.2 - Establish and Maintain Contact Information for Reporting Security Incidents

Establish and maintain contact information for parties that need to be informed of security incidents. Contacts may include internal staff, third-party vendors, law enforcement, cyber insurance providers, relevant government agencies, Information Sharing and Analysis Center (ISAC) partners, or other stakeholders. Verify contacts annually to ensure that information is up-to-date.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS17.4 - Establish and Maintain an Incident Response Process

Establish and maintain an incident response process that addresses roles and responsibilities, compliance requirements, and a communication plan. Review annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS17.6 - Define Mechanisms for Communicating During Incident Response

Determine which primary and secondary mechanisms will be used to communicate and report during a security incident. Mechanisms can include phone calls, emails, or letters. Keep in mind that certain mechanisms, such as emails, can be affected during a security incident. Review annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS17.7 - Conduct Routine Incident Response Exercises

Plan and conduct routine incident response exercises and scenarios for key personnel involved in the incident response process to prepare for responding to real-world incidents. Exercises need to test communication channels, decision making, and workflows. Conduct testing on an annual basis, at a minimum.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS17.8 - Conduct Post-Incident Reviews

Conduct post-incident reviews. Post-incident reviews help prevent incident recurrence through identifying lessons learned and follow-up action.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CIS17.9 - Establish and Maintain Security Incident Thresholds

Establish and maintain security incident thresholds, including, at a minimum, differentiating between an incident and an event. Examples can include: abnormal activity, security vulnerability, security weakness, data breach, privacy incident, etc. Review annually, or when significant enterprise changes occur that could impact this Safeguard.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.DE.AE-03.01 - Event Information Correlation.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-03.01: The organization implements systematic and real-time logging, collection, monitoring, detection, and alerting measures across multiple layers of the organization's infrastructure, including physical perimeters, network, operating systems, applications, data, and external (cloud and outsourced) environments, sufficient to protect the organization's information assets.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-03.02 - Event Information Correlation.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-03.02: The organization performs real-time central analysis, aggregation, and correlation of anomalous activities, network and system alerts, and relevant event and cyber threat intelligence, including both internal and external (cloud and outsourced) environments, to better detect and prevent multifaceted cyber attacks.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-04.01 - Impact & Scope Determination

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-04.01: The organization has a documented process to analyze and triage incidents to assess root cause, technical impact, mitigation priority, and business impact on the organization, as well as across the financial sector and other third party stakeholders.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-06.01 - Event Information Sharing

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-06.01: The organization has established processes and protocols to communicate, alert, and regularly report potential cyber attacks and incident information, including its corresponding analysis and cyber threat intelligence, to authorized internal and external stakeholders.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-07.01 - Contextual Analysis.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-07.01: The organization implements measures for monitoring external sources (e.g., social media, the dark web, etc.) to integrate with other intelligence information to better detect and evaluate potential threats and compromises.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-07.02 - Contextual Analysis.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-07.02: Relevant event data is packaged for subsequent review and triage and events are categorized for efficient handling, assignment, and escalation.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.AE-08.01 - Incident Declaration

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.AE-08.01: Defined criteria and severity levels are in place to facilitate the declaration, escalation, organization, and alignment of response activities to response plans within the organization and across relevant third parties.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.DE.CM-02.01 - Physical Environment Monitoring

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - DE.CM-02.01: The organization's controls include monitoring and detection of anomalous activities and potential intrusion events across the organization's physical environment and infrastructure, including the detection of environmental threats (fire, water, service outages, etc.) and unauthorized physical access to high-risk system components and locations.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.EX.DD-03.01 - Technology & Cybersecurity Risk Assessment.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.01: The organization reviews, evaluates, and risk assesses a prospective critical third party's cybersecurity program, including its ability to identify, assess, monitor, and mitigate its cyber risks; the completeness of its policies and procedures; the strength of its technical and administrative controls; and the coverage of its internal and independent control testing programs.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.EX.DD-03.02 - Technology & Cybersecurity Risk Assessment.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.02: The organization reviews, evaluates, and risk assesses a prospective critical third party's business continuity program, to include business impact analyses, risk assessments, continuity plans, disaster recovery plans, technology resilience architecture, and response and recovery plans, test plans, and test results.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.EX.DD-03.03 - Technology & Cybersecurity Risk Assessment.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-03.03: The organization reviews, evaluates, and risk assesses a prospective critical third party's incident response program, to include monitoring and alerting capabilities, incident reporting procedures and protocols, and capabilities for event analysis, problem resolution, and forensic investigation.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.EX.DD-04.01 - Product & Service Due Diligence.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-04.01: The organization defines and implements procedures for assessing the compatibility, security, integrity, and authenticity of externally-developed or externally-sourced applications, software, software components, and firmware before deployment and upon any major change.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.EX.DD-04.02 - Product & Service Due Diligence.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - EX.DD-04.02: The organization reviews and evaluates any technologies or information systems proposed to support a third party's services or activities, to include compatibility with the organization's technology and cybersecurity architectures, interactions and interfaces with existing systems, security controls, operational management and support requirements, and suitability to the task.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OC-01.01 - Organizational Mission

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-01.01: Technology and cybersecurity strategies, architectures, and programs are formally governed to align with and support the organization's mission, objectives, priorities, tactical initiatives, and risk profile.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-02.01 - Stakeholder Risk Management Expectations.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.01: The organization's obligation to its customers, employees, and stakeholders to maintain safety and soundness, while balancing size and complexity, is reflected in the organization's risk management strategy and framework, its risk appetite and risk tolerance statements, and in a risk-aware culture.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-02.02 - Stakeholder Risk Management Expectations.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.02: Technology and cybersecurity risk management strategies identify and communicate the organization’s role within the financial services sector as a component of critical infrastructure.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-02.03 - Stakeholder Risk Management Expectations.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-02.03: Technology and cybersecurity risk management strategies identify and communicate the organization's role as it relates to other critical infrastructure sectors outside of the financial services sector and the interdependency risks.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-03.01 - Legal, Regulatory, & Contractual Requirements.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-03.01: The organization's technology and cybersecurity strategy, framework, and policies align and are consistent with the organization's legal, statutory, contractual, and regulatory obligations and ensure that compliance responsibilities are unambiguously assigned.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-03.02 - Legal, Regulatory, & Contractual Requirements.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-03.02: The organization implements and maintains a documented policy or policies that address customer data privacy that is approved by a designated officer or the organization’s appropriate governing body (e.g., the Board or one of its committees).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-04.01 - Stakeholder Service Expectations.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.01: The organization maintains an inventory of key internal assets, business functions, and external dependencies that includes mappings to other assets, business functions, and information flows.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-04.02 - Stakeholder Service Expectations.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.02:   The organization documents the business processes that are critical for the delivery of services and the functioning of the organization, and the impacts to the business if those processes are degraded or not functioning.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-04.03 - Stakeholder Service Expectations.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.03:   Resilience requirements to support the delivery of critical services are established for all operating states (e.g., under duress/attack, during recovery, and normal operations).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-04.04 - Stakeholder Service Expectations.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-04.04:   The organization prioritizes the resilience design, planning, testing, and monitoring of systems and other key internal and external dependencies according to their criticality to the supported business functions, enterprise mission, and to the financial services sector.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-05.01 - Organizational Service Dependencies.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.01:   The organization identifies, assesses, and documents the key dependencies, interdependencies, and potential points of failure to support the delivery of critical services (e.g., systems, business processes, workforce, third parties, facilities, etc.)

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-05.02 - Organizational Service Dependencies.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.02: The organization has prioritized its external dependencies according to their criticality to the supported enterprise mission, business functions, and to the financial services sector.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-05.03 - Organizational Service Dependencies.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.03: The organization defines objectives (e.g., Recovery Time Objective, Maximum Tolerable Downtime, Impact Tolerance) for the resumption of critical operations in alignment with business imperatives, stakeholder obligations, and critical infrastructure dependencies.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OC-05.04 - Organizational Service Dependencies.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OC-05.04: Recovery point objectives to support data integrity are consistent with the organization's recovery time objectives, information flow dependencies between systems, and business obligations.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.OV-01.01 - Risk Management Strategy Outcomes Review.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.01: The governing authority (e.g., the Board or one of its committees) regularly reviews and evaluates the organization's ability to manage its technology, cybersecurity, third-party, and resilience risks.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-01.02 - Risk Management Strategy Outcomes Review.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.02: The designated Cybersecurity Officer (e.g., CISO) periodically reports to the appropriate governing authority (e.g., the Board or one of its committees) or equivalent governing body on the status of cybersecurity within the organization.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-01.03 - Risk Management Strategy Outcomes Review.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-01.03: The designated Technology Officer (e.g., CIO or CTO) regularly reports to the governing authority (e.g., the Board or one of its committees) on the status of technology use and risks within the organization.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-02.01 - Risk Management Strategy Review & Adjustment.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-02.01: The organization regularly assesses its inherent technology and cybersecurity risks and ensures that changes to the business and threat environment lead to updates to the organization's strategies, programs, risk appetite and risk tolerance.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-02.02 - Risk Management Strategy Review & Adjustment.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-02.02: The organization determines and articulates how it intends to maintain an acceptable level of residual technology and cybersecurity risk as set by the governing authority (e.g., the Board or one of its committees).

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-03.01 - Risk Management Performance Measurement.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-03.01: The organization develops, implements, and reports to management and the governing body (e.g., the Board or one of its committees) key technology and cybersecurity risk and performance indicators and metrics to measure, monitor, and report actionable indicators.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.OV-03.02 - Risk Management Performance Measurement.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.OV-03.02: Resilience program performance is measured and regularly reported to senior executives and the governing authority (e.g., the Board or one of its committees).

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.PO-01.01 - Establishment of Policies & Procedures.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.01: Technology and cybersecurity policies are documented, maintained and approved by the governing authority (e.g., the Board or one of its committees) or a designated executive.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.02 - Establishment of Policies & Procedures.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.02: The accountable governing body, and applicable cybersecurity program and policies, for any given organizational unit, affiliate, or merged entity are clearly established, applied, and communicated.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.03 - Establishment of Policies & Procedures.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.03: The organization's incentive programs are consistent with cyber risk management objectives, and technology and cybersecurity policies integrate with an employee accountability policy to ensure that all personnel are held accountable for complying with policies.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.04 - Establishment of Policies & Procedures.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.04: All personnel (employees and third party) consent to policies addressing acceptable technology use, social media use, personal device use (e.g., BYOD), confidentiality, and/or other security-related policies and agreements as warranted by their position.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.05 - Establishment of Policies & Procedures.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.05: Technology and cybersecurity processes, procedures, and controls are established in alignment with cybersecurity policy.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.06 - Establishment of Policies & Procedures.06

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.06: Physical and environmental security policies are implemented and managed.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.07 - Establishment of Policies & Procedures.07

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.07: The organization maintains documented business continuity and resilience program policies and procedures approved by the governing authority (e.g., the Board or one of its committees).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-01.08 - Establishment of Policies & Procedures.08

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-01.08:   The organization maintains documented third-party risk management program policies and procedures approved by the governing authority (e.g., the Board or one of its committees).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.PO-02.01 - Policy & Procedure Review & Update

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.PO-02.01:   The cybersecurity policy is regularly reviewed, revised, and communicated under the leadership of a designated Cybersecurity Officer (e.g., CISO) to address changes in the risk profile and risk appetite, the evolving threat environment, and new technologies, products, services, and interdependencies.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.RM-01.01 - Risk Management Objectives Agreement.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.01:   Technology and cybersecurity risk management strategies and frameworks are approved by the governing authority (e.g., the Board or one of its committees) and incorporated into the overall business strategy and enterprise risk management framework.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-01.02 - Risk Management Objectives Agreement.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.02:   Technology and cybersecurity risk management strategies and frameworks are informed by applicable international, national, and financial services industry standards and guidelines.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-01.03 - Risk Management Objectives Agreement.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.03: The organization has established, and maintains, technology and cybersecurity programs designed to protect the confidentiality, integrity and availability of its information and operational systems, commensurate with the organization's risk appetite and business needs.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-01.04 - Risk Management Objectives Agreement.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.04: Technology and cybersecurity risk management programs incorporate risk identification, measurement, monitoring, and reporting.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-01.05 - Risk Management Objectives Agreement.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-01.05: The organization's technology, cybersecurity, resilience, and third-party risk management programs, policies, resources, and priorities are aligned and mutually supporting.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-02.01 - Risk Appetite & Risk Tolerance Statements.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.01: The governing authority (e.g., the Board or one of its committees) endorses and regularly reviews technology and cybersecurity risk appetite and is regularly informed about the status of, and material changes to, the organization's inherent risk profile.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-02.02 - Risk Appetite & Risk Tolerance Statements.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.02:   The organization has established statements of technology and cybersecurity risk tolerance consistent with its risk appetite, and has integrated them into technology, cybersecurity, operational, and enterprise risk management practices.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-02.03 - Risk Appetite & Risk Tolerance Statements.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-02.03:   Determination of the organization's risk appetite and tolerance includes consideration of the organization's stakeholder obligations, role in critical infrastructure, and sector-specific risk analysis.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-03.01 - Enterprise Risk Integration.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.01:   Technology and cybersecurity risk management frameworks and programs are integrated into the enterprise risk management framework.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-03.02 - Enterprise Risk Integration.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.02:   The organization's business continuity and resilience strategy and program align with and support the overall enterprise risk management framework.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-03.03 - Enterprise Risk Integration.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.03:   Technology and cybersecurity risk management and risk assessment processes are consistent with the organization's enterprise risk management policies, procedures, and methodologies and include criteria for the evaluation and categorization of enterprise-specific risks and threats.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-03.04 - Enterprise Risk Integration.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-03.04:   Technology and cybersecurity risk management considerations are integrated into daily operations, cultural norms, management discussions, and management decision-making, and are tailored to address enterprise-specific risks (both internal and external).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-04.01 - Risk Response Strategic Direction

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-04.01:   The governing authority (e.g., the Board or one of its committees) and senior management provide guidance, direction, and credible challenge in the design and implementation of risk management strategies, assessment of identified risks against risk appetite and risk tolerance, and in the selection of risk treatment approaches.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-05.01 - Lines of Communication.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-05.01: The organization has a process for monitoring its technology, cybersecurity, and third-party risks, including escalating those risks that exceed risk appetite to management and identifying risks with the potential to impact multiple operating units.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.RM-05.02 - Lines of Communication.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-05.02: The organization establishes minimum requirements for its third-parties that include how the organizations will communicate and coordinate in times of emergency, including: 1) Joint maintenance of contingency plans; 2) Responsibilities for responding to incidents, including forensic investigations; 3) Planning and testing strategies that address severe events in order to identify single points of failure that would cause wide-scale disruption; and 4) Incorporating the potential impact of an incident into their BCM process and ensure resilience capabilities are in place.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.RM-06.01 - Standardized Risk Management Method

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-06.01: Technology and cybersecurity risk management and risk assessment processes and methodologies are documented and regularly reviewed and updated to address changes in the risk profile and risk appetite, the evolving threat environment, and new technologies, products, services, and interdependencies.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RM-07.01 - Strategic Opportunities

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RM-07.01: The organization has mechanisms in place to ensure that strategies, initiatives, opportunities, and emerging technologies (e.g., artificial intelligence, quantum computing, etc.) are evaluated both in terms of risks and uncertainties that are potentially detrimental to the organization, as well as potentially advantageous to the organization (i.e., positive risks).

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.GV.RR-03.01 - Resource Adequacy.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.01: The organization's budgeting and resourcing processes identify, prioritize, and address resource needs to manage identified technology and cybersecurity risks (e.g., skill shortages, headcount, new tools, incident-related expenses, and unsupported systems).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RR-03.02 - Resource Adequacy.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.02: The organization regularly assesses its skill and resource level requirements against its current personnel complement to determine gaps in resource need.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.RR-03.03 - Resource Adequacy.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.RR-03.03: The organization provides adequate resources, appropriate authority, and access to the governing authority for the designated Cybersecurity Officer (e.g., CISO).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.GV.SC-03.01 - Supply Chain Risk Management Integration

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - GV.SC-03.01: The organization's third-party risk management strategy and program aligns with and supports its enterprise, technology, cybersecurity, and resilience risk management frameworks and programs.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-01.01 - Continuous Improvements Evaluation.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.01: Technology, cybersecurity, and resilience controls are regularly assessed and/or tested for design and operating effectiveness.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-01.02 - Continuous Improvements Evaluation.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.02: The organization implements a regular process to collect, store, report, benchmark, and assess trends in actionable performance indicators and risk metrics (e.g., threat KRIs, security incident metrics, vulnerability metrics, and operational measures).

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-01.03 - Continuous Improvements Evaluation.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.03: The organization establishes specific objectives, performance criteria, benchmarks, and tolerance limits to identify areas that have improved or are in need of improvement over time.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-01.04 - Continuous Improvements Evaluation.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.04: Technology and cybersecurity programs include elements designed to assess, manage, and continually improve the quality of program delivery in addressing stakeholder requirements and risk reduction.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-01.05 - Continuous Improvements Evaluation.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-01.05: The organization's third-party risk management program is regularly assessed, reported on, and improved.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.ID.IM-03.01 - Improvements from Lessons Learned.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-03.01: A formal process is in place to improve protection controls and processes by integrating recommendations, findings, and lessons learned from exercises, testing, audits, assessments, and incidents.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-03.02 - Improvements from Lessons Learned.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-03.02: The organization establishes a systematic and comprehensive program to regularly evaluate and improve its monitoring and detection processes and controls as the threat environment changes, tools and techniques evolve, and lessons are learned.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.01 - Plans Affecting Operations.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.01: The organization's business continuity, disaster recovery, crisis management, and response plans are in place and managed, aligned with each other, and incorporate considerations of cyber incidents.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.02 - Plans Affecting Operations.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.02: The organization's incident response and business continuity plans contain clearly defined roles, responsibilities, and levels of decision-making authority, and include all needed areas of participation and expertise across the organization and key third-parties.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.03 - Plans Affecting Operations.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.03: Recovery plans include service resumption steps for all operating environments, including traditional, alternate recovery, and highly available (e.g., cloud) infrastructures.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.04 - Plans Affecting Operations.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.04: The organization has plans to identify, in a timely manner, the status of all transactions and member positions at the time of a disruption, supported by corresponding recovery point objectives.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.05 - Plans Affecting Operations.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.05:   Recovery plans include restoration of resilience following a long term loss of capability (e.g., at an alternate site or a third-party), detailing when the plan should be activated and implementation steps.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.06 - Plans Affecting Operations.06

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.06:   The organization has established and implemented plans to identify and mitigate the cyber risks it poses through interconnectedness to sector partners and external stakeholders.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.07 - Plans Affecting Operations.07

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.07:   The organization pre-identifies, pre-qualifies, and retains third party incident management support and forensic service firms, as required, that can be called upon to quickly assist with incident response, investigation, and recovery.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.IM-04.08 - Plans Affecting Operations.08

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.IM-04.08:   The organization regularly reviews response strategy, incident management plans, recovery plans, and associated tests and exercises and updates them, as necessary, based on: (1) Lessons learned from incidents that have occurred (both internal and external to the organization); (2) Current cyber threat intelligence (both internal and external sources); (3) Recent and wide-scale cyber attack scenarios; (4) Operationally and technically plausible future cyber attacks; (5) Organizational or technical environment changes; and, (6) New technological developments.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-02.01 - Information Sharing Forums.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-02.01: The organization participates actively (in alignment with its business operations, inherent risk, and complexity) in information-sharing groups and collectives (e.g., cross-industry, cross-government and cross-border groups) to gather, distribute and analyze information about cyber practices, cyber threats, and early warning indicators relating to cyber threats.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-02.02 - Information Sharing Forums.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-02.02: The organization shares authorized information on its cyber resilience framework and the effectiveness of protection technologies bilaterally with trusted external stakeholders to promote the understanding of each party's approach to securing systems.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-03.01 - Threat Identification.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.01: The organization, on an ongoing basis, identifies, analyzes, correlates, characterizes, and reports threats that are internal and external to the firm.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-03.02 - Threat Identification.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.02: The organization solicits and considers threat intelligence received from the organization's stakeholders, service and utility providers, and other industry and security organizations.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-03.03 - Threat Identification.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.03: The organization includes in its threat analysis those cyber threats which could trigger extreme but plausible cyber events, even if they are considered unlikely to occur or have never occurred in the past.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-03.04 - Threat Identification.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-03.04: The organization regularly reviews and updates its threat analysis methodology, threat information sources, and supporting tools.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-04.01 - Impact & Likelihood Analysis

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-04.01: The organization's risk assessment approach includes the analysis and characterization of the likelihood and potential business impact of identified risks being realized.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-05.01 - Risk Exposure Determination & Prioritization.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.01: Threats, vulnerabilities, likelihoods, and impacts are used to determine overall technology, cybersecurity, and resilience risk to the organization.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-05.02 - Risk Exposure Determination & Prioritization.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.02: The organization has established threat modeling capabilities to identify how and why critical assets might be compromised by a threat actor, what level of protection is needed for those critical assets, and what the impact would be if that protection failed.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-05.03 - Risk Exposure Determination & Prioritization.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.03: The organization's business units assess, on an ongoing basis, the technology, cybersecurity, and resilience risks associated with the activities of the business unit.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-05.04 - Risk Exposure Determination & Prioritization.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-05.04: The organization uses scenario planning, table-top-exercises, or similar event analysis techniques to identify vulnerabilities and determine potential impacts to critical infrastructure, technology, and business processes.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.01 - Risk Response Determination.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.01: Technology and cybersecurity risk management programs and risk assessment processes produce actionable recommendations that the organization uses to select, design, prioritize, implement, maintain, evaluate, and modify cybersecurity and technology controls.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.02 - Risk Response Determination.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.02: The implementation of responses to address identified risks (i.e., risk avoidance, risk mitigation, risk acceptance, or risk transfer (e.g., cyber insurance)) are formulated, assessed, documented, and prioritized based on criticality to the business.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.03 - Risk Response Determination.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.03: Technology and cybersecurity programs identify and implement controls to manage applicable risks within the risk appetite set by the governing authority (e.g., the Board or one of its committees).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.04 - Risk Response Determination.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.04: The organization assesses the threats, impacts, and risks that could adversely affect the organization's ability to provide services on an ongoing basis, and develops its resilience requirements and plans to address those risks.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.05 - Risk Response Determination.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.05: The organization defines and implements standards and procedures to prioritize and remediate issues identified in vulnerability scanning or penetration testing, including emergency or zero-day threats and vulnerabilities.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-06.06 - Risk Response Determination.06

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-06.06: The organization follows documented procedures, consistent with established risk response processes, for mitigating or accepting the risk of vulnerabilities or weaknesses identified in exercises and testing or when responding to incidents.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-07.01 - Change & Exception Management.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.01: The organization defines and implements change management standards and procedures, to include emergency change procedures, that explicitly address risk identified both prior to and during a change, any new risk created post-change, as well as the reviewing and approving authorities (e.g., change advisory boards).

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-07.02 - Change & Exception Management.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.02: Risk-based criteria are used to categorize each system change, to include emergency changes, to determine the necessary change process standards to apply for change planning, rollback planning, pre-change testing, change access control, post-change verification, and change review and approval.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-07.03 - Change & Exception Management.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.03: Technology projects and system change processes ensure that requisite changes in security posture, data classification and flows, architecture, support documentation, business processes, and business resilience plans are addressed.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-07.04 - Change & Exception Management.04

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.04: Policy exceptions, risk mitigation plans, and risk acceptances resulting from assessments and evaluations, such as testing, exercises, audits, etc., are formally managed, approved, escalated to defined levels of management, and tracked to closure.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.ID.RA-07.05 - Change & Exception Management.05

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - ID.RA-07.05: The organization establishes and maintains an exception management process for identified vulnerabilities that cannot be mitigated within target timeframes.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.AA-02.01 - Identity Binding to Credentials

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-02.01: The organization authenticates identity, validates the authorization level of a user before granting access to its systems, limits the use of an account to a single individual, and attributes activities to the user in logs and transactions.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.PR.AA-03.01 - Authentication.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.01: Based on the risk level of a user access or a specific transaction, the organization defines and implements authentication requirements, which may include multi-factor or out-of-band authentication, and may adopt other real-time risk prevention or mitigation tactics.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.AA-03.02 - Authentication.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.02: Decisions to authorize user access to devices and other assets are made with consideration of: (1) Business need for the access; (2) The type of data being accessed (e.g., customer PII, public data); (3) The risk of the transaction (e.g., internal-to-internal, external-to-internal); (4) The organization's level of trust for the accessing agent (e.g., external application, internal user); and (5) The potential for harm.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.AA-03.03 - Authentication.03

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-03.03: The organization reduces fraudulent activity and protects reputational integrity through email verification mechanisms (e.g., DMARC, DKIM), call-back verification, secure file exchange facilities, out-of-band communications, customer outreach and education, and other tactics designed to thwart imposters and fraudsters.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.AA-04.01 - Identity Assertions

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-04.01: Access credential and authorization mechanisms for internal systems and across security perimeters (e.g., leveraging directory services, directory synchronization, single sign-on, federated access, credential mapping, etc.) are designed to maintain security, integrity, and authenticity.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.PR.AA-06.01 - Physical Access.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-06.01: The organization manages, protects, and logs physical access to sensitive areas, devices, consoles, equipment, and network cabling and infrastructure.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.AA-06.02 - Physical Access.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.AA-06.02: The organization manages and protects physical and visual access to sensitive information assets and physical records (e.g., session lockout, clean desk policies, printer/facsimile output trays, file cabinet/room security, document labelling, etc.)

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.DS-10.01 - Protection of Data in Use

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.DS-10.01: Data-in-use is protected commensurate with the criticality and sensitivity of the information and in alignment with the data classification and protection policy (e.g., through the use of encryption, authentication, access control, masking, tokenization, visual shielding, memory integrity monitoring, etc.)

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.IR-02.01 - Environmental Threat Protections

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-02.01: The organization designs, documents, implements, tests, and maintains environmental and physical controls to meet defined business resilience requirements (e.g., environmental monitoring, dual power and communication sources, regionally separated backup processing facilities, etc.)

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.IR-03.01 - Resilience Measures

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-03.01: The organization implements mechanisms (e.g., failsafe, load balancing, hot swaps, redundant equipment, alternate services, backup facilities, etc.) to achieve resilience requirements in normal and adverse situations.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.PR.IR-04.01 - Capacity Management.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-04.01: Baseline measures of network and system utilization and transaction activity are captured to support capacity planning and anomalous activity detection.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.PR.IR-04.02 - Capacity Management.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - PR.IR-04.02: Technology availability and capacity is planned, monitored, managed, and optimized to meet business resilience objectives and reasonably anticipated infrastructure demands.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.CO-03.01 - Recovery Activity Communication.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.CO-03.01:   The organization timely involves and communicates the recovery activities, procedures, cyber risk management issues to the governing body (e.g., the Board or one of its committees), senior management, incident management support teams, and relevant internal stakeholders.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.CO-03.02 - Recovery Activity Communication.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.CO-03.02:   The organization promptly communicates the status of recovery activities to regulatory authorities and relevant external stakeholders, as required or appropriate.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.RP-01.01 - Recovery Plan Execution

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-01.01:   The organization executes its recovery plans, including incident recovery, disaster recovery, and business continuity plans, during or after an incident to resume operations.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.RP-02.01 - Recovery Action Performance.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-02.01:   The organization's response plans are used as informed guidance to develop and manage task plans, response actions, priorities, and assignments for responding to incidents, but are adapted as necessary to address incident-specific characteristics.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.RP-02.02 - Recovery Action Performance.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-02.02: Recovery plans are executed by first resuming critical services and core business functions, while minimizing any potential concurrent and widespread interruptions to interconnected entities and critical infrastructure, such as energy and telecommunications.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.RP-04.01 - Post-Incident Operational Norms

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-04.01: Restoration steps include the verification of data integrity, transaction positions, system functionality, and the operation of security controls by appropriate organizational stakeholders and system owners.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RC.RP-05.01 - Asset Integrity Restoration.01

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-05.01: The organization maintains documented procedures for sanitizing, testing, authorizing, and returning systems to service following an incident or investigation.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.RC.RP-05.02 - Asset Integrity Restoration.02

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-05.02: Business, technology, cybersecurity, and relevant third-party stakeholders confirm that systems, data, and services have been returned to functional and secure states and that a stable operational status has been achieved.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.RC.RP-06.01 - End-of-Incident Determination

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RC.RP-06.01: Incident management activities are closed under defined conditions and documentation to support subsequent post-mortem review, process improvement, and any follow-on activities is collected and verified.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.RS.AN-06.01 - Investigation Documentation

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-06.01: The organization establishes a risk-based approach and procedures for quarantining systems, conducting investigations, and collecting and preserving evidence per best practices and forensic standards.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.AN-07.01 - Incident Data Collection & Preservation

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-07.01: Incident-related forensic data is captured, secured, and preserved in a manner supporting integrity, provenance, and evidentiary value.

Overall Assessment: **Not Implemented**

Comments:

No comments.

CRI.RS.AN-08.01 - Incident Magnitude Determination

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.AN-08.01: Available incident information is assessed to determine the extent of impact to the organization and its stakeholders, the potential near- and long-term financial implications, and whether or not the incident constitutes a material event.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.MA-02.01 - Incident Triage & Validation

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-02.01: Tools and processes are in place to ensure timely detection, inspection, assessment, and analysis of security event data for reliable activation of incident response processes.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.MA-03.01 - Incident Categorization & Prioritization

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-03.01: The organization categorizes and prioritizes cybersecurity incident response consistent with response plans and criticality of systems and services to the enterprise.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.MA-04.01 - Incident Escalation

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MA-04.01: Response activities are centrally coordinated, response progress and milestones are tracked and documented, and new incident information is assimilated into ongoing tasks, assignments, and escalations.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.MI-01.01 - Incident Containment

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MI-01.01: The organization has established processes to implement vulnerability mitigation plans, involve third-party partners and outside expertise as needed, and contain incidents in a timely manner.

Overall Assessment: **Fully Implemented**

Comments:

No comments.

CRI.RS.MI-02.01 - Incident Eradication

NIST CSF 2.0 Informative Reference - CRI Profile v2.0 - RS.MI-02.01: Targeted investigations and actions are taken to ensure that all vulnerabilities, system components, devices, or remnants used or leveraged in an attack (e.g., malware, compromised accounts, open ports, etc.) are removed or otherwise returned to a secure and reliable state, or that plans to address the vulnerabilities are documented.

Overall Assessment: **Fully Implemented**

Comments:

No comments.