Security, Compliance & Resilience Management System Prioritized Implementation Guide (SCRMS-PIG)

START HERE

1 Establish Context For Security, Compliance & Resilience (SCR) Operations

- 1a — GOV-08 — Define the entity's mission to establish the business context for necessary SCR capabilities.
- 1b — GOV-01, GOV-01.1, GOV-04, GOV-04.1 — Establish a **Security, Compliance & Resilience Program (SCRP)**, including enforcement & resourcing authority.
- 1c — CPL-01, GOV-15.1 — Define **Minimum Compliance Requirements (MCR)** that reflect the entity's applicable statutory, regulatory and contractual obligations for cybersecurity and data protection.
- 1d — GOV-15.1, RSK-03.1, THR-09 — Define preliminary **Discretionary Requirements** that reflect the entity's reasonable security and resilience expectations, based on applicable threats and risks (e.g., risk & threat catalogs).
- 1e — GOV-15, GOV-15.1 — Define the preliminary **Living Control Set (LCS)** for the entity, based on OSR and MCR. This is the **Minimum Security Requirements (MSR)** baseline.
- 1f — CPL-01.2 — Define the scope of the SCRP, based on the LCS and applicable **People, Processes, Technology, Data & Facilities (PPTDF)**.
- 1g — PRM-01.2 — Define target maturity criteria at the domain or control level for the LCS.

SCRMS Principle #1: Establish Context · SCRMS Principle #2: Identify Applicable Controls · SCRMS Principle #3: Define Maturity Expectations

2 Implement Centralized Governance Practices

- 2a — GOV-02 — From a centralized authority, develop, implement and maintain policies and standards to address SCRP needs, based on the LCS.
- 2b — GOV-02.1 — Provide the capability to manage exception requests to published standards.
- 2c — GOV-01.2, GOV-01.3 — Provide a commitment to continuously improve security, compliance & resilience capabilities.
- 2d — AST-01.2, GOV-15.2, OPS-01.1 — Identify stakeholders and assign control ownership from the LCS to applicable stakeholders. Stakeholders develop and maintain **Standardized Operating Procedures (SOP)** to implement controls.

SCRMS Principle #4: Publish Governance Documentation · SCRMS Principle #5: Assign Stakeholder Accountability

3 Align Risk Management Practices Across The Entity

- 3a — RSK-01 — Develop & implement an entity-wide **Risk Management Program (RMP)** for SCRP operations to identify, assess and remediate risk that is tied into **Enterprise Risk Management (ERM)** practices.
- 3b — RSK-01.3, RSK-01.4, RSK-01.5 — Define entity-specific risk appetite, risk threshold and risk tolerance criteria.
- 3c — GOV-15.1, GOV-15.2, GOV-16.1, GOV-16.2 — Define materiality for the entity, UNLESS that criteria to define material controls, material incidents, material threats and material risks.
- 3d — RSK-01.1, RSK-03, RSK-04, RSK-04.1, RSK-04.2, RSK-05 — Define a risk assessment methodology that is appropriate for the entity's SCRP needs to identify, categorize and assess risks.
- 3e — RSK-06 — Define stakeholder requirements for risk remediation actions to remediate risks to an acceptable level.
- 3e — RSK-04.1, IAO-05 — Develop a centralized risk register or **Plan of Action & Milestones (POA&M)** to provide situational awareness of risks and govern remediation activities.

4 Gain Clarity On The Entity's PPTDF

- 4a — AST-02 — Create and maintain a detailed inventory for all **Technology Assets, Applications, Services and/or Data (TAASD)**.
- 4b — TPM-01.1 — Create and maintain a detailed inventory for all **External Service Providers (ESP)** and **Cloud Service Providers (CSP)**.
- 4c — CLD-09, DCH-00.2, DCH-19, DCH-24, PRM-05.4, PRM-09.4 — Create and maintain a detailed inventory for all sensitive and/or regulated data, including geolocation information.
- 4d — AST-04 — Create detailed network diagrams that cover all **Technology Assets, Applications and/or Services (TAAS)**, including TAAS maintained by ESP and/or CSP.
- 4e — AST-02.8, AST-04 — Create **Data Flow Diagrams (DFD)** that shows how sensitive and/or regulated data flows across the entity's TAAS, including contractor flow-down.
- 4f — BCD-02, TPM-02 — Identify critical TAAS, including ESP and CSP.
- 4f — BCD-01.4 — Based on the entity's mission and business operations, define preliminary **Recovery Time Objectives (RTOs)** and **Recovery Point Objectives (RPOs)** to provide context to asset criticality.

5 Resource The SCRP

- 5a — PRM-02, PRM-01.1, PRM-03 — Develop & implement a resource plan (e.g., business plan, budget, road map, etc.) to operationalize the entity's SCRP (e.g., necessary PPTDF components).
- 5b — PRM-01, PRM-01.1, PRM-03, PRM-04, PRM-05 — Prioritize stakeholder objectives based on the resource plan for PPTDF.

SCRMS Principle #6: Prioritize Capability According To Risk

6 Establish Criteria To Be Secure, Compliant & Resilient

- 6a — SEA-01, SEA-01.2, SEA-01.3, SEA-02, SEA-02.3, SEA-03, SEA-20 — Secure engineering principles are defined to ensure security, compliance & resilience capabilities are implemented by default and by design.
- 6b — PRM-05, PRM-07 — Stakeholders govern security, compliance & resilience requirements across the **System Development Lifecycle (SDLC)**.
- 6c — TDA-01, TDA-01.1, TDA-02, TDA-02.1, TDA-02.10, TDA-04.2, TDA-05, TDA-06, TDA-06.1, TDA-06.2, TDA-06.3, TDA-07, TDA-09 — Security, compliance & resilience capabilities are implemented by default and by design in product management processes (e.g., updates, features, etc.)
- 6d — CAP-01, CAP-03, CAP-05 — Implement a capacity and performance management capability to support resilience requirements.
- 6e — GOV-15.3, GOV-15.4, IAO-01, IAO-02, IAO-02.4, IAO-03, IAO-04, IAO-05, IAO-06 — Implement an **Information Assurance Program (IAP)** to ensure secure, compliant & resilient capabilities are included by default and by design.
- 6f — RSK-06.1, RSK-06.2, RSK-06.4 — Implement **Risk Treatment Plans (RTP)** that include viable compensating controls when primary controls cannot be implemented or are deficient.

7 Establish Capabilities To Secure The Supply Chain

- 7a — RSK-09, TPM-03 — Develop a **Cybersecurity Supply Chain Risk Management (C-SCRM) Plan** that is applicable across the entity.
- 7b — TPM-01, TPM-03, TPM-04 — Develop and implement acquisition strategies, contract tools, and procurement methods to operationalize the C-SCRM Plan.
- 7c — TPM-05, TPM-05.2, TPM-05.7 — Enforce C-SCRM requirements across the supply chain through contracts and flow-down requirements.
- 7d — RSK-09.1, TPM-04.1 — Establish a process for identifying and addressing weaknesses or deficiencies in the supply chain elements and processes.
- 7e — TPM-05.4 — Create a **Responsible, Accountable, Supportive, Consulted & Informed (RASIC)** matrix to eliminate assumptions with ESP.

8 — OPS-01, OPS-02, OPS-03 — Empower cybersecurity and data protection personnel to enforce secure, compliant and resilient practices. POA&M deficiencies.

9 — HRS-01, HRS-01.1, HRS-02, HRS-02.1, HRS-04, HRS-04.1, HRS-05, HRS-05.1, HRS-05.7, HRS-07, HRS-07.1, HRS-08, HRS-09, HRS-10, HRS-13, HRS-14 — Work with **Human Resources (HR)** to ensure personnel security requirements are integrated into HR operations. POA&M deficiencies.

10 — DCH-01, DCH-01.1, DCH-01.4, DCH-02, DCH-13, DCH-13.3, DCH-17, DCH-18, DCH-19, DCH-21, DCH-24, DCH-25 — Define and implement processes to securely handle data wherever it is stored, processed and/or transmitted. Limit logical and physical access to sensitive and/or regulated data. POA&M deficiencies.

11 — CLD-01, CLD-02, CLD-09, CLD-10, NET-02, NET-02.2, NET-03, NET-04, NET-04.1, NET-10, NET-12, NET-12.2, NET-14, NET-14.5, NET-14.7, NET-16, NET-18, WEB-01, WEB-10 — Develop and implement a segmented network architecture and industry-recognized secure practices for networking. POA&M deficiencies.

12 — CHG-01, CHG-02, CHG-02.1, CHG-03 — Develop & implement change control processes, including a **Change Control Board (CCB)**. POA&M deficiencies.

13 — IRO-02, IRO-02, IRO-10, IRO-04, IRO-07, IRO-10, IRO-13 — Develop & implement incident response capabilities to detect, respond and recover from incidents. POA&M deficiencies.

14 — MON-01, MON-01.2, MON-01.4, MON-01.8, MON-03, MON-11.3, MON-16, THR-03 — Develop & implement situational awareness capabilities through threat intelligence, log collection and analysis (e.g., SIEM). POA&M deficiencies.

15 — CFG-01, CFG-02, CFG-02.7, CFG-03, CRY-01, CRY-03, CRY-05, CRY-06, CRY-09 — Identify, build & implement **Secure Baseline Configurations (SBC's)** (e.g., hardening standards) for all technology platforms and enforcing secure configurations (e.g., Directory Services, Active Directory, Intune, etc.). POA&M deficiencies.

16 — IAC-01, IAC-01.2, IAC-01.3, IAC-06, IAC-07, IAC-08, IAC-10, IAC-10.8, IAC-10.11, IAC-15, IAC-15.7, IAC-16, IAC-16.1, IAC-17, IAC-20, IAC-21 — Develop & implement **Identity & Access Management (IAM)** capabilities to address "least privilege" and **Role-Based Access Control (RBAC)**. POA&M deficiencies.

17 — AST-01, AST-01.1, AST-01.2, AST-02, AST-02.8, AST-04, AST-09, AST-16, END-01, END-04, END-04.4, END-04.7, END-08, MDM-01, MDM-03, MDM-05, MDM-06, MDM-07, MDM-11 — Develop & implement **Information Technology Asset Management (ITAM)** practices, including **Endpoint Device Management (EDM)**. POA&M deficiencies.

18 — EMB-01, EMB-02, EMB-07, EMB-10 — Develop & implement embedded technology capabilities for **Operational Technology (OT)** and **Internet of Things (IoT)** assets. POA&M deficiencies.

19 — MNT-01, MNT-02, MNT-05 — Develop & implement proactive maintenance practices. POA&M deficiencies.

20 — VPM-01, VPM-02, VPM-03, VPM-05, VPM-06 — Develop & implement **Attack Surface Management (ASM)** practices. POA&M deficiencies.

21 — AAT-01, AAT-01.2, AAT-02, AAT-02.3, AAT-10 — Develop & implement **Artificial Intelligence & Autonomous Technologies (AAT)** governance practices. POA&M deficiencies.

22 — BCD-01, BCD-01.4, BCD-01.5, BCD-02, BCD-02.1, BCD-02.2, BCD-02.3, BCD-11, BCD-12 — Develop & implement **Business Continuity & Disaster Recovery (BCDR)** capabilities. POA&M deficiencies.

23 — PRI-01, PRI-01.11, PRI-02, PRI-03, PRI-04, PRI-05.5, PRI-06, PRI-14, PRI-17, RSK-10 — Develop & implement a data privacy program. POA&M deficiencies.

24 — PES-01, PES-01.1, PES-01.2, PES-02, PES-02.1, PES-03, PES-04, PES-05, PES-06, PES-12 — Develop & implement physical & environmental security capabilities. POA&M deficiencies.

25 — SAT-01, SAT-02, SAT-03 — Build and maintain a security minded workforce through security, compliance & resilience training & awareness. POA&M deficiencies.

26 — THR-01, THR-03, THR-09, THR-10 — Build and maintain a **Threat Intelligence Program (TIP)**. POA&M deficiencies.

27 — GOV-15.5, GOV-19, GOV-19, CPL-01.1, CPL-01.3, CPL-01.4, CPL-02.2, CPL-03.2 — Provide oversight of SCRP controls, including deficiencies and remediation activities.

SCRMS Principle #7: Maintain Situational Awareness

28 — CPL-01.1, IAO-01, RSK-04.1, TPM-05.5, TPM-08, TPM-10 — Manage changes that affect the entity's security, compliance & resilience, including the supply chain.

SCRMS Principle #8: Manage Risk

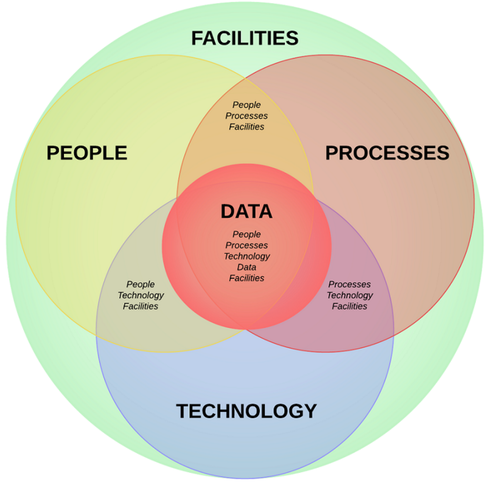
29 — BCD-04, IRO-06 — Test processes to ensure they are secure, compliant and resilient.

30 — GOV-01.2, GOV-01.3, GOV-05, GOV-06.1, GOV-05.2 — Report the status of the SCRP to a governing body (e.g., quarterly business reviews to a steering committee).

SCRMS Principle #9: Evolve Processes

LEGEND

- Applicable SCF Control
- Due Diligence Focus
- Due Care Focus



PRIORITIZED IMPLEMENTATION GUIDE

SCF SCRMS

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