

## NIST IR 8477-Based Set Theory Relationship Mapping (STRM)

Reference Document: Secure Controls Framework (SCF) version 2025.4

STRM Guidance: <https://securecontrolsframework.com/set-theory-relationship-mapping-strm/>Focal Document: **HIPAA Security Rule & NIST SP 800-66 R2**Focal Document URL: <https://www.hhs.gov/sites/default/files/ocr/privacy/hipaa/administrative/combined/hipaa-simplification-201303.pdf>Published STRM URL: <https://securecontrolsframework.com/content/strm/scf-strm-us-fed-hipaa-security-rule.pdf>

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.306	Security standards: General rules	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(a)	General requirements	Covered entities and business associates must do the following:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity and data protection governance controls.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity and data protection practices for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Select Controls	GOV-15.1	Mechanisms exist to compel data and/or process owners to select required cybersecurity and data protection controls for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Implement Controls	GOV-15.2	Mechanisms exist to compel data and/or process owners to implement required cybersecurity and data protection controls for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Assess Controls	GOV-15.3	Mechanisms exist to compel data and/or process owners to assess if required cybersecurity and data protection controls for each Technology Asset, Application and/or Service (TAAS) under their control are implemented correctly and are operating as intended.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Authorize Technology Assets, Applications and/or Services (TAAS)	GOV-15.4	Mechanisms exist to compel data and/or process owners to obtain authorization for the production use of each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(a)(1)	N/A	Ensure the confidentiality, integrity, and availability of all electronic protected health information the covered entity or business associate creates, receives, maintains, or transmits.	Functional	Subset Of	Monitor Controls	GOV-15.5	Mechanisms exist to compel data and/or process owners to monitor Technology Assets, Applications and/or Services (TAAS) under their control on an ongoing basis for applicable threats and risks, as well as to ensure cybersecurity and data protection controls are operating as intended.	10	
§ 164.306(a)(2)	N/A	Protect against any reasonably anticipated threats or hazards to the security or integrity of such information.	Functional	Subset Of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity and data protection governance controls.	10	
§ 164.306(a)(3)	N/A	Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required under subpart E of this part.	Functional	Subset Of	Risk Management Program	RSK-01	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	10	
§ 164.306(a)(3)	N/A	Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required under subpart E of this part.	Functional	Subset Of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity and data protection governance controls.	10	
§ 164.306(a)(3)	N/A	Protect against any reasonably anticipated uses or disclosures of such information that are not permitted or required under subpart E of this part.	Functional	Subset Of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
§ 164.306(b)	Flexibility of approach	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(b)(1)	N/A	Covered entities and business associates may use any security measures that allow the covered entity or business associate to reasonably and appropriately implement the standards and implementation specifications as specified in this subpart.	Functional	Intersects With	Define Control Objectives	GOV-09	Mechanisms exist to establish control objectives as the basis for the selection, implementation and management of the organization's internal control system.	5	
§ 164.306(b)(1)	N/A	Covered entities and business associates may use any security measures that allow the covered entity or business associate to reasonably and appropriately implement the standards and implementation specifications as specified in this subpart.	Functional	Subset Of	Operationalizing Cybersecurity & Data Protection Practices	GOV-15	Mechanisms exist to compel data and/or process owners to operationalize cybersecurity and data protection practices for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(b)(1)	N/A	Covered entities and business associates may use any security measures that allow the covered entity or business associate to reasonably and appropriately implement the standards and implementation specifications as specified in this subpart.	Functional	Subset Of	Secure Engineering Principles	SEA-01	Mechanisms exist to facilitate the implementation of industry-recognized cybersecurity and data protection practices in the specification, design, development, implementation and modification of Technology Assets, Applications and/or Services (TAAS).	10	
§ 164.306(b)(1)	N/A	Covered entities and business associates may use any security measures that allow the covered entity or business associate to reasonably and appropriately implement the standards and implementation specifications as specified in this subpart.	Functional	Intersects With	Alignment With Enterprise Architecture	SEA-02	Mechanisms exist to develop an enterprise architecture, aligned with industry-recognized leading practices, with consideration for cybersecurity and data protection principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
§ 164.306(b)(1)	N/A	Covered entities and business associates may use any security measures that allow the covered entity or business associate to reasonably and appropriately implement the standards and implementation specifications as specified in this subpart.	Functional	Intersects With	Defense-In-Depth (DID) Architecture	SEA-03	Mechanisms exist to implement security functions as a layered structure minimizing interactions between layers of the design and avoiding any dependence by lower layers on the functionality or correctness of higher layers.	3	
§ 164.306(b)(2)	N/A	In deciding which security measures to use, a covered entity or business associate must take into account the following factors:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(b)(2)(i)	N/A	The size, complexity, and capabilities of the covered entity or business associate.	Functional	Intersects With	Defining Business Context & Mission	GOV-08	Mechanisms exist to define the context of its business model and document the organization's mission.	5	
§ 164.306(b)(2)(i)	N/A	The size, complexity, and capabilities of the covered entity or business associate.	Functional	Intersects With	Business Process Definition	PRM-06	Mechanisms exist to define business processes with consideration for cybersecurity and data protection that determines:	5	
§ 164.306(b)(2)(i)	N/A	The covered entity's or the business associate's technical infrastructure, hardware, and software security capabilities.	Functional	Intersects With	Cybersecurity & Data Protection Requirements Definition	PRM-05	(1) The resulting risk to organizational operations, assets, individuals and other organizations; and (2) Information protection needs arising from the defined business processes and revise the processes as necessary, until an achievable set of protection needs is obtained.	5	
§ 164.306(b)(2)(ii)	N/A	The covered entity's or the business associate's technical infrastructure, hardware, and software security capabilities.	Functional	Intersects With	Alignment With Enterprise Architecture	SEA-02	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical Technology Assets, Applications and/or Services (TAAS) at pre-defined decision points in the Secure Development Life Cycle (SDLC).	5	
§ 164.306(b)(2)(ii)	N/A	The costs of security measures.	Functional	Subset Of	Allocation of Resources	PRM-03	Mechanisms exist to develop an enterprise architecture, aligned with industry-recognized leading practices, with consideration for cybersecurity and data protection principles that addresses risk to organizational operations, assets, individuals, other organizations.	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Subset Of	Risk Management Program	RSK-01	Mechanisms exist to identify and allocate resources for management, operational, technical and data privacy requirements within business process planning for projects / initiatives.	10	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Risk Framing	RSK-01.1	Mechanisms exist to facilitate the implementation of strategic, operational and tactical risk management controls.	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Risk-Based Security Categorization	RSK-02	Mechanisms exist to identify critical system components and functions by performing a criticality analysis for critical Technology Assets, Applications, Services and/or Data (TAASD) in accordance with applicable laws, regulations and contractual obligations that:	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Risk Identification	RSK-03	(1) Document the security categorization results (including supporting rationale) in the security plan for systems; and (2) Ensure the security categorization decision is reviewed and approved by the asset owner.	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Risk Catalog	RSK-03.1	Mechanisms exist to develop and keep current a catalog of applicable risks associated with the organization's business operations and technologies in use.	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Risk Assessment	RSK-04	Mechanisms exist to conduct recurring assessments of risk that includes the likelihood and magnitude of harm, from unauthorized access, use, disclosure, disruption, modification or destruction of the organization's Technology Assets, Applications, Services and/or Data (TAASD).	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Threat Catalog	THR-09	Mechanisms exist to develop and keep current a catalog of applicable internal and external threats to the organization, both natural and manmade.	5	
§ 164.306(b)(2)(iv)	N/A	The probability and criticality of potential risks to electronic protected health information.	Functional	Intersects With	Threat Analysis	THR-10	Mechanisms exist to identify, assess, prioritize and document the potential impact(s) and likelihood(s) of applicable internal and external threats.	5	
§ 164.306(c)	Standards	A covered entity or business associate must comply with the applicable standards as provided in this section and in § 164.308, § 164.310, § 164.312, § 164.314 and § 164.316 with respect to all electronic protected health information.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
§ 164.306(d)	Implementation specifications	In this subpart:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(d)(1)	N/A	Implementation specifications are required or addressable. If an implementation specification is required, the word "Required" appears in parentheses after the title of the implementation specification. If an implementation specification is addressable, the word "Addressable" appears in parentheses after the title of the implementation specification.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.306(d)(2)	N/A	When a standard adopted in § 164.308, § 164.310, § 164.312, § 164.314, or § 164.316 includes required implementation specifications, a covered entity or business associate must implement the implementation specifications.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
§ 164.306(d)(3)	N/A	When a standard adopted in § 164.308, § 164.310, § 164.312, § 164.314, or § 164.316 includes addressable implementation specifications, a covered entity or business associate must—	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(d)(3)(i)	N/A	Assess whether each implementation specification is a reasonable and appropriate safeguard in its environment, when analyzed with reference to the likely contribution to protecting electronic protected health information; and	Functional	Intersects With	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity and data protection controls oversight function that reports to the organization's executive leadership.	5	
§ 164.306(d)(3)(i)	N/A	Assess whether each implementation specification is a reasonable and appropriate safeguard in its environment, when analyzed with reference to the likely contribution to protecting electronic protected health information; and	Functional	Intersects With	Cybersecurity & Data Protection Assessments	CPL-03	Mechanisms exist to regularly review processes and documented procedures to ensure conformity with the organization's cybersecurity and data protection policies, standards and other applicable requirements.	5	
§ 164.306(d)(3)(i)	N/A	Assess whether each implementation specification is a reasonable and appropriate safeguard in its environment, when analyzed with reference to the likely contribution to protecting electronic protected health information; and	Functional	Intersects With	Functional Review Of Cybersecurity & Data Protection Controls	CPL-03.2	Mechanisms exist to regularly review technology assets for adherence to the organization's cybersecurity and data protection policies and standards.	5	
§ 164.306(d)(3)(ii)	N/A	As applicable to the covered entity or business associate—	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(d)(3)(ii)(A)	N/A	Implement the implementation specification if reasonable and appropriate; or	Functional	Subset Of	Implement Controls	GOV-15.2	Mechanisms exist to compel data and/or process owners to implement required cybersecurity and data protection controls for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.306(d)(3)(ii)(B)	N/A	If implementing the implementation specification is not reasonable and appropriate—	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.306(d)(3)(ii)(B)(1)	N/A	Document why it would not be reasonable and appropriate to implement the implementation specification; and	Functional	Subset Of	Exception Management	GOV-02.1	Mechanisms exist to prohibit exceptions to standards, except when the exception has been formally assessed for risk impact, approved and recorded.	10	
§ 164.306(d)(3)(ii)(B)(2)	N/A	Implement an equivalent alternative measure if reasonable and appropriate.	Functional	Equal	Compensating Countermeasures	RSK-06.2	Mechanisms exist to identify and implement compensating countermeasures to reduce risk and exposure to threats.	10	
§ 164.306(e)	Maintenance	A covered entity or business associate must review and modify the security measures implemented under this subpart as needed to continue provision of reasonable and appropriate protection of electronic protected health information, and update documentation of such security measures in accordance with § 164.316(b)(2)(iii).	Functional	Equal	Functional Review Of Cybersecurity & Data Protection Controls	CPL-03.2	Mechanisms exist to regularly review technology assets for adherence to the organization's cybersecurity and data protection policies and standards.	10	
§ 164.308	Administrative safeguards	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)	N/A	A covered entity or business associate must, in accordance with § 164.306:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)(1)(i)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)(1)(i)	Standard: Security management process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(1)(i)	Standard: Security management process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	Functional	Subset Of	Configuration Management Program	CFG-01	Mechanisms exist to facilitate the implementation of configuration management controls.	10	
§ 164.308(a)(1)(i)	Standard: Security management process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	Functional	Subset Of	Change Management Program	CHG-01	Mechanisms exist to facilitate the implementation of a change management program.	10	
§ 164.308(a)(1)(i)	Standard: Security management process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	Functional	Subset Of	Continuous Monitoring	MON-01	Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls.	10	
§ 164.308(a)(1)(i)	Standard: Security management process	Implement policies and procedures to prevent, detect, contain, and correct security violations.	Functional	Subset Of	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity and data protection-related incidents.	10	
§ 164.308(a)(1)(ii)	Implementation specifications:	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)(1)(ii)(A)	Risk analysis (Required)	Conduct an accurate and thorough assessment of the potential risks and vulnerabilities to the confidentiality, integrity, and availability of electronic protected health information held by the covered entity or business associate.	Functional	Equal	Risk Assessment	RSK-04	Mechanisms exist to conduct recurring assessments of risk that includes the likelihood and magnitude of harm, from unauthorized access, use, disclosure, disruption, modification or destruction of the organization's Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.308(a)(1)(ii)(B)	Risk management (Required)	Implement security measures sufficient to reduce risks and vulnerabilities to a reasonable and appropriate level to comply with § 164.205(e).	Functional	Intersects With	Define Control Objectives	GOV-09	Mechanisms exist to establish control objectives as the basis for the selection, implementation and management of the organization's internal control system.	5	
§ 164.308(a)(1)(ii)(B)	Risk management (Required)	Implement security measures sufficient to reduce risks and vulnerabilities to a reasonable and appropriate level to comply with § 164.206(g).	Functional	Subset Of	Implement Controls	GOV-15.2	Mechanisms exist to compel data and/or process owners to implement required cybersecurity and data protection controls for each Technology Asset, Application and/or Service (TAAS) under their control.	10	
§ 164.308(a)(1)(ii)(C)	Sanction policy (Required)	Apply appropriate sanctions against workforce members who fail to comply with the security policies and procedures of the covered entity or business associate.	Functional	Equal	Personnel Sanctions	HRS-07	Mechanisms exist to sanction personnel failing to comply with established security policies, standards and procedures.	10	
§ 164.308(a)(1)(ii)(D)	Information system activity review (Required)	Implement procedures to regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports.	Functional	Subset Of	Continuous Monitoring	MON-01	Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls.	10	
§ 164.308(a)(1)(ii)(D)	Information system activity review (Required)	Implement procedures to regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports.	Functional	Intersects With	Security Event Monitoring	MON-01.8	Mechanisms exist to review event logs on an ongoing basis and escalate incidents in accordance with established timelines and procedures.	5	
§ 164.308(a)(1)(ii)(D)	Information system activity review (Required)	Implement procedures to regularly review records of information system activity, such as audit logs, access reports, and security incident tracking reports.	Functional	Intersects With	Situational Awareness For Incidents	IRO-09	Mechanisms exist to document, monitor and report the status of cybersecurity and data protection incidents to internal stakeholders all the way through the resolution of the incident.	5	
§ 164.308(a)(2)	Standard: Assigned security responsibility	Identify the security official who is responsible for the development and implementation of the policies and procedures required by this subpart for the covered entity or business associate.	Functional	Equal	Assigned Cybersecurity & Data Protection Responsibilities	GOV-04	Mechanisms exist to assign one or more qualified individuals with the mission and resources to centrally-manage, coordinate, develop, implement and maintain an enterprise-wide cybersecurity and data protection program.	10	
§ 164.308(a)(3)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)(3)(i)	Standard: Workforce security	Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a)(4) of this section, and to prevent those workforce members who do not have access under paragraph (a)(4) of this section from obtaining access to electronic protected health information.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(3)(i)	Standard: Workforce security	Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a)(4) of this section, and to prevent those workforce members who do not have access under paragraph (a)(4) of this section from obtaining access to electronic protected health information.	Functional	Intersects With	Sensitive / Regulated Data Access Enforcement	CFG-08	Mechanisms exist to configure Technology Assets, Applications and/or Services (TAAS) to restrict access to sensitive/regulated data.	5	
§ 164.308(a)(3)(i)	Standard: Workforce security	Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a)(4) of this section, and to prevent those workforce members who do not have access under paragraph (a)(4) of this section from obtaining access to electronic protected health information.	Functional	Subset Of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
§ 164.308(a)(3)(i)	Standard: Workforce security	Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a)(4) of this section, and to prevent those workforce members who do not have access under paragraph (a)(4) of this section from obtaining access to electronic protected health information.	Functional	Intersects With	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce Role-Based Access Control (RBAC) for Technology Assets, Applications, Services and/or Data (TAASD) to restrict access to individuals assigned specific roles with legitimate business needs.	5	
§ 164.308(a)(3)(i)	Standard: Workforce security	Implement policies and procedures to ensure that all members of its workforce have appropriate access to electronic protected health information, as provided under paragraph (a)(4) of this section, and to prevent those workforce members who do not have access under paragraph (a)(4) of this section from obtaining access to electronic protected health information.	Functional	Intersects With	Least Privilege	IAC-21	Mechanisms exist to utilize the concept of least privilege, allowing only authorized access to processes necessary to accomplish assigned tasks in accordance with organizational business functions.	5	
§ 164.308(a)(3)(ii)	Implementation specifications:	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(a)(3)(ii)(A)	Authorization and/or supervision (Addressable)	Implement procedures for the authorization and/or supervision of workforce members who work with electronic protected health information or in locations where it might be accessed.	Functional	Subset Of	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	10	
§ 164.308(a)(3)(ii)(A)	Authorization and/or supervision (Addressable)	Implement procedures for the authorization and/or supervision of workforce members who work with electronic protected health information or in locations where it might be accessed.	Functional	Intersects With	Change of Roles & Duties	IAC-07.1	Mechanisms exist to revoke user access rights following changes in personnel roles and duties, if no longer necessary or permitted.	3	

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§ 164.308(a)(3)(ii)(A)	Authorization and/or supervision (Addressable)	Implement procedures for the authorization and/or supervision of workforce members who work with electronic protected health information or in locations where it might be accessed.	Functional	Intersects With	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce Role-Based Access Control (RBAC) for Technology Assets, Applications, Services and/or Data (TAASD) to restrict access to individuals assigned specific roles with legitimate business needs.	5	
§ 164.308(a)(3)(ii)(A)	Authorization and/or supervision (Addressable)	Implement procedures for the authorization and/or supervision of workforce members who work with electronic protected health information or in locations where it might be accessed.	Functional	Intersects With	Management Approval For New or Changed Accounts	IAC-28.1	Mechanisms exist to ensure management approvals are required for new accounts or changes in permissions to existing accounts.	5	
§ 164.308(a)(3)(ii)(B)	Workforce clearance procedure (Addressable)	Implement procedures to determine that the access of a workforce member to electronic protected health information is appropriate.	Functional	Intersects With	Position Categorization	HRS-02	Mechanisms exist to manage personnel security risk by assigning a risk designation to all positions and establishing screening criteria for individuals filling those positions.	5	
§ 164.308(a)(3)(ii)(B)	Workforce clearance procedure (Addressable)	Implement procedures to determine that the access of a workforce member to electronic protected health information is appropriate.	Functional	Intersects With	Defined Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity roles & responsibilities for all personnel.	5	
§ 164.308(a)(3)(ii)(B)	Workforce clearance procedure (Addressable)	Implement procedures to determine that the access of a workforce member to electronic protected health information is appropriate.	Functional	Intersects With	Periodic Review of Account Privileges	IAC-17	Mechanisms exist to periodically-review the privileges assigned to individuals and service accounts to validate the need for such privileges and reassign or remove unnecessary privileges, as necessary.	5	
§ 164.308(a)(3)(ii)(C)	Termination procedures (Addressable)	Implement procedures for terminating access to electronic protected health information when the employment of, or other arrangement with, a workforce member ends or as required by determinations made as specified in paragraph (a)(3)(ii)(B) of this section.	Functional	Intersects With	Personnel Transfer	HRS-08	Mechanisms exist to adjust logical and physical access authorizations to Technology Assets, Applications and/or Services (TAAS) and facilities upon personnel reassignment or transfer, in a timely manner.	5	
§ 164.308(a)(3)(ii)(C)	Termination procedures (Addressable)	Implement procedures for terminating access to electronic protected health information when the employment of, or other arrangement with, a workforce member ends or as required by determinations made as specified in paragraph (a)(3)(ii)(B) of this section.	Functional	Intersects With	Personnel Termination	HRS-09	Mechanisms exist to govern the termination of individual employment.	5	
§ 164.308(a)(3)(ii)(C)	Termination procedures (Addressable)	Implement procedures for terminating access to electronic protected health information when the employment of, or other arrangement with, a workforce member ends or as required by determinations made as specified in paragraph (a)(3)(ii)(B) of this section.	Functional	Intersects With	User Provisioning & De-Provisioning	IAC-07	Mechanisms exist to utilize a formal user registration and de-registration process that governs the assignment of access rights.	5	
§ 164.308(a)(3)(ii)(C)	Termination procedures (Addressable)	Implement procedures for terminating access to electronic protected health information when the employment of, or other arrangement with, a workforce member ends or as required by determinations made as specified in paragraph (a)(3)(ii)(B) of this section.	Functional	Intersects With	Termination of Employment	IAC-07.2	Mechanisms exist to revoke user access rights in a timely manner, upon termination of employment or contract.	5	
§ 164.308(a)(4)	[no content]		Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(4)(i)	Standard: Information access management	Implement policies and procedures for authorizing access to electronic protected health information that are consistent with the applicable requirements of subpart E of this part.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(4)(i)	Standard: Information access management	Implement policies and procedures for authorizing access to electronic protected health information that are consistent with the applicable requirements of subpart E of this part.	Functional	Subset Of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
§ 164.308(a)(4)(ii)	Implementation specifications:	[no content]	Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(4)(ii)(A)	Isolating health care clearinghouse functions (Required)	If a health care clearinghouse is part of a larger organization, the clearinghouse must implement policies and procedures that protect the electronic protected health information of the clearinghouse from unauthorized access by the larger organization.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(4)(ii)(B)	Access authorization (Addressable)	Implement policies and procedures for granting access to electronic protected health information, for example, through access to a workstation, transaction, program, process, or other mechanism.	Functional	Subset Of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
§ 164.308(a)(4)(ii)(C)	Access establishment and modification (Addressable)	Implement policies and procedures that, based upon the covered entity's or the business associate's access authorization policies, establish, document, review, and modify a user's right of access to a workstation, transaction, program, or process.	Functional	Equal	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce Role-Based Access Control (RBAC) for Technology Assets, Applications, Services and/or Data (TAASD) to restrict access to individuals assigned specific roles with legitimate business needs.	10	
§ 164.308(a)(5)	[no content]		Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(5)(i)	Standard: Security awareness and training	Implement a security awareness and training program for all members of its workforce (including management).	Functional	Subset Of	Cybersecurity & Data Protection-Minded Workforce	SAT-01	Mechanisms exist to facilitate the implementation of security workforce development and awareness controls.	10	
§ 164.308(a)(5)(i)	Standard: Security awareness and training	Implement a security awareness and training program for all members of its workforce (including management).	Functional	Intersects With	Cybersecurity & Data Protection Awareness Training	SAT-02	Mechanisms exist to provide all employees and contractors appropriate awareness education and training that is relevant for their job function.	5	
§ 164.308(a)(5)(ii)	Implementation specifications:	[no content]	Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(5)(ii)(A)	Security reminders (Addressable)	Periodic security updates.	Functional	Equal	Cyber Threat Environment	SAT-03.6	Mechanisms exist to provide role-based cybersecurity and data protection awareness training that is current and relevant to the cyber threats that users might encounter in day-to-day business operations.	10	
§ 164.308(a)(5)(ii)(B)	Protection from malicious software (Addressable)	Procedures for guarding against, detecting, and reporting malicious software.	Functional	Equal	Suspicious Communications & Anomalous System Behavior	SAT-03.2	Mechanisms exist to provide training to personnel on organization-defined indicators of malware to recognize suspicious communications and anomalous behavior.	10	
§ 164.308(a)(5)(ii)(C)	Log-in monitoring (Addressable)	Procedures for monitoring log-in attempts and reporting discrepancies.	Functional	Equal	Role-Based Cybersecurity & Data Protection Training	SAT-03	Mechanisms exist to provide role-based cybersecurity and data protection-related training: (1) Before authorizing access to the system or performing assigned duties; (2) When required by system changes; and (3) Annually thereafter.	10	
§ 164.308(a)(5)(ii)(D)	Password management (Addressable)	Procedures for creating, changing, and safeguarding passwords.	Functional	Equal	Role-Based Cybersecurity & Data Protection Training	SAT-03	Mechanisms exist to provide role-based cybersecurity and data protection-related training: (1) Before authorizing access to the system or performing assigned duties; (2) When required by system changes; and (3) Annually thereafter.	10	
§ 164.308(a)(6)	[no content]		Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(6)(i)	Standard: Security incident procedures	Implement policies and procedures to address security incidents.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(6)(i)	Standard: Security incident procedures	Implement policies and procedures to address security incidents.	Functional	Subset Of	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity and data protection-related incidents.	10	
§ 164.308(a)(6)(ii)	Implementation specification: Response and reporting (Required)	Identify and respond to suspected or known security incidents; mitigate, to the extent practicable, harmful effects of security incidents that are known to the covered entity or business associate; and document security incidents and their outcomes.	Functional	Equal	Incident Handling	IRO-02	Mechanisms exist to cover: (1) Preparation; (2) Automated event detection or manual incident report intake; (3) Analysis; (4) Containment; (5) Eradication; and (6) Recovery.	10	
§ 164.308(a)(7)	[no content]		Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(7)(i)	Standard: Contingency plan	Establish (and implement as needed) policies and procedures for responding to an emergency or other occurrence (for example, fire, vandalism, system failure, and natural disaster) that damages systems that contain electronic protected health information.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.308(a)(7)(i)	Standard: Contingency plan	Establish (and implement as needed) policies and procedures for responding to an emergency or other occurrence (for example, fire, vandalism, system failure, and natural disaster) that damages systems that contain electronic protected health information.	Functional	Subset Of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient Technology Assets, Applications and/or Services (TAAS) (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
§ 164.308(a)(7)(i)	Standard: Contingency plan	Establish (and implement as needed) policies and procedures for responding to an emergency or other occurrence (for example, fire, vandalism, system failure, and natural disaster) that damages systems that contain electronic protected health information.	Functional	Subset Of	Incident Response Operations	IRO-01	Mechanisms exist to implement and govern processes and documentation to facilitate an organization-wide response capability for cybersecurity and data protection-related incidents.	10	
§ 164.308(a)(7)(ii)	Implementation specifications:	[no content]	Functional	No Relationship		N/A	No applicable SCF control	N/A	
§ 164.308(a)(7)(ii)(A)	Data backup plan (Required)	Establish and implement procedures to create and maintain retrievable exact copies of electronic protected health information.	Functional	Equal	Data Backups	BCD-11	Mechanisms exist to create recurring backups of data, software and/or system images, as well as verify the integrity of these backups, to ensure the availability of the data to satisfy Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	10	
§ 164.308(a)(7)(ii)(B)	Disaster recovery plan (Required)	Establish (and implement as needed) procedures to restore any loss of data.	Functional	Equal	Information System Recovery & Reconstitution	BCD-12	Mechanisms exist to ensure the secure recovery and reconstitution of Technology Assets, Applications and/or Services (TAAS) to a known state after a disruption, compromise or failure.	10	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.308(a)(7)(ii)(C)	Emergency mode operation plan (Required)	Establish (and implement as needed) procedures to enable continuation of critical business processes for protection of the security of electronic protected health information while operating in emergency mode.	Functional	Subset Of	Business Continuity Management System (BCMS)	BCD-01	Mechanisms exist to facilitate the implementation of contingency planning controls to help ensure resilient Technology Assets, Applications and/or Services (TAAS) (e.g., Continuity of Operations Plan (COOP) or Business Continuity & Disaster Recovery (BC/DR) playbooks).	10	
§ 164.308(a)(7)(ii)(C)	Emergency mode operation plan (Required)	Establish (and implement as needed) procedures to enable continuation of critical business processes for protection of the security of electronic protected health information while operating in emergency mode.	Functional	Intersects With	Continue Essential Mission & Business Functions	BCD-02.2	Mechanisms exist to continue essential missions and business functions with little or no loss of operational continuity and sustain that continuity until full system restoration at primary processing and/or storage sites.	5	
§ 164.308(a)(7)(ii)(D)	Testing and revision procedures (Addressable)	Implement procedures for periodic testing and revision of contingency plans.	Functional	Intersects With	Contingency Plan Testing & Exercises	BCD-04	Mechanisms exist to conduct tests and/or exercises to evaluate the contingency plan's effectiveness and the organization's readiness to execute the plan.	5	
§ 164.308(a)(7)(ii)(D)	Testing and revision procedures (Addressable)	Implement procedures for periodic testing and revision of contingency plans.	Functional	Intersects With	Contingency Plan Root Cause Analysis (RCA) & Lessons Learned	BCD-05	Mechanisms exist to conduct a Root Cause Analysis (RCA) and "lessons learned" activity every time the contingency plan is activated.	5	
§ 164.308(a)(7)(ii)(E)	Applications and data criticality analysis (Addressable)	Assess the relative criticality of specific applications and data in support of other contingency plan components.	Functional	Subset Of	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	10	
§ 164.308(a)(7)(ii)(E)	Applications and data criticality analysis (Addressable)	Assess the relative criticality of specific applications and data in support of other contingency plan components.	Functional	Intersects With	Asset-Service Dependencies	AST-01.1	Mechanisms exist to identify and assess the security of technology assets that support more than one critical business function.	8	
§ 164.308(a)(7)(ii)(E)	Applications and data criticality analysis (Addressable)	Assess the relative criticality of specific applications and data in support of other contingency plan components.	Functional	Intersects With	Identify Critical Assets	BCD-02	Mechanisms exist to identify and document the critical Technology Assets, Applications, Services and/or Data (TAASD) that support essential missions and business functions.	8	
§ 164.308(a)(7)(ii)(E)	Applications and data criticality analysis (Addressable)	Assess the relative criticality of specific applications and data in support of other contingency plan components.	Functional	Intersects With	Third-Party Criticality Assessments	TPM-02	Mechanisms exist to identify, prioritize and assess suppliers and partners of critical Technology Assets, Applications and/or Services (TAAS) using a supply chain risk assessment process relative to their importance in supporting the delivery of high-value services.	3	
§ 164.308(a)(8)	Standard: Evaluation	Perform a periodic technical and nontechnical evaluation, based initially upon the standards implemented under this rule and, subsequently, in response to environmental or operational changes affecting the security of electronic protected health information, that establishes the extent to which a covered entity's or business associate's security policies and procedures meet the requirements of this subpart.	Functional	Intersects With	Functional Review Of Cybersecurity & Data Protection Controls	CPL-03.2	Mechanisms exist to regularly review technology assets for adherence to the organization's cybersecurity and data protection policies and standards.	5	
§ 164.308(a)(8)	Standard: Evaluation	Perform a periodic technical and nontechnical evaluation, based initially upon the standards implemented under this rule and, subsequently, in response to environmental or operational changes affecting the security of electronic protected health information, that establishes the extent to which a covered entity's or business associate's security policies and procedures meet the requirements of this subpart.	Functional	Intersects With	Assessment Boundaries	IAO-01.1	Mechanisms exist to establish the scope of assessments by defining the assessment boundary, according to people, processes and technology that directly or indirectly impact the confidentiality, integrity, availability and safety of the Technology Assets, Applications, Services and/or Data (TAASD) under review.	5	
§ 164.308(a)(8)	Standard: Evaluation	Perform a periodic technical and nontechnical evaluation, based initially upon the standards implemented under this rule and, subsequently, in response to environmental or operational changes affecting the security of electronic protected health information, that establishes the extent to which a covered entity's or business associate's security policies and procedures meet the requirements of this subpart.	Functional	Intersects With	Assessments	IAO-02	Mechanisms exist to formally assess the cybersecurity and data protection controls in Technology Assets, Applications and/or Services (TAAS) through Information Assurance Program (IAP) activities to determine the extent to which the controls are implemented correctly, operating as intended and producing the desired outcome with respect to meeting expected requirements.	3	
§ 164.308(b)	Business associate contracts and other arrangements	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.308(b)(1)	N/A	A covered entity may permit a business associate to create, receive, maintain, or transmit electronic protected health information on the covered entity's behalf only if the covered entity obtains satisfactory assurances, in accordance with § 164.314(a), that the business associate will appropriately safeguard the information. A covered entity is not required to obtain such satisfactory assurances from a business associate that is a subcontractor.	Functional	Subset Of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
§ 164.308(b)(1)	N/A	A covered entity may permit a business associate to create, receive, maintain, or transmit electronic protected health information on the covered entity's behalf only if the covered entity obtains satisfactory assurances, in accordance with § 164.314(a), that the business associate will appropriately safeguard the information. A covered entity is not required to obtain such satisfactory assurances from a business associate that is a subcontractor.	Functional	Intersects With	Third-Party Services	TPM-04	Mechanisms exist to mitigate the risks associated with third-party access to the organization's Technology Assets, Applications, Services and/or Data (TAASD).	5	
§ 164.308(b)(1)	N/A	A covered entity may permit a business associate to create, receive, maintain, or transmit electronic protected health information on the covered entity's behalf only if the covered entity obtains satisfactory assurances, in accordance with § 164.314(a), that the business associate will appropriately safeguard the information. A covered entity is not required to obtain such satisfactory assurances from a business associate that is a subcontractor.	Functional	Intersects With	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	5	
§ 164.308(b)(1)	N/A	A covered entity may permit a business associate to create, receive, maintain, or transmit electronic protected health information on the covered entity's behalf only if the covered entity obtains satisfactory assurances, in accordance with § 164.314(a), that the business associate will appropriately safeguard the information. A covered entity is not required to obtain such satisfactory assurances from a business associate that is a subcontractor.	Functional	Intersects With	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity and data protection requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
§ 164.308(b)(1)	N/A	A covered entity may permit a business associate to create, receive, maintain, or transmit electronic protected health information on the covered entity's behalf only if the covered entity obtains satisfactory assurances, in accordance with § 164.314(a), that the business associate will appropriately safeguard the information. A covered entity is not required to obtain such satisfactory assurances from a business associate that is a subcontractor.	Functional	Intersects With	Responsible, Accountable, Supportive, Consulted & Informed (RASCI) Matrix	TPM-05.4	Mechanisms exist to document and maintain a Responsible, Accountable, Supportive, Consulted & Informed (RASCI) matrix, or similar documentation, to delineate assignment for cybersecurity and data protection controls between internal stakeholders and External Service Providers (ESPs).	5	
§ 164.308(b)(2)	N/A	A business associate may permit a business associate that is a subcontractor to create, receive, maintain, or transmit electronic protected health information on its behalf only if the business associate obtains satisfactory assurances, in accordance with § 164.314(a), that the subcontractor will appropriately safeguard the information.	Functional	Intersects With	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	5	
§ 164.308(b)(2)	N/A	A business associate may permit a business associate that is a subcontractor to create, receive, maintain, or transmit electronic protected health information on its behalf only if the business associate obtains satisfactory assurances, in accordance with § 164.314(a), that the subcontractor will appropriately safeguard the information.	Functional	Intersects With	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity and data protection requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
§ 164.308(b)(2)	N/A	A business associate may permit a business associate that is a subcontractor to create, receive, maintain, or transmit electronic protected health information on its behalf only if the business associate obtains satisfactory assurances, in accordance with § 164.314(a), that the subcontractor will appropriately safeguard the information.	Functional	Intersects With	First-Party Declaration (1PD)	TPM-05.6	Mechanisms exist to obtain a First-Party Declaration (1PD) from applicable External Service Providers (ESPs) that provides assurance of compliance with specified statutory, regulatory and contractual obligations for cybersecurity and data protection controls, including any flow-down requirements to subcontractors.	5	
§ 164.308(b)(3)	Implementation specifications: Written contract or other arrangement (Required)	Document the satisfactory assurances required by paragraph (b)(1) or (b)(2) of this section through a written contract or other arrangement with the business associate that meets the applicable requirements of § 164.314(a).	Functional	Intersects With	Adequate Security for Sensitive / Regulated Data in Support of Contracts	IAO-03.2	Mechanisms exist to protect sensitive / regulated data that is collected, developed, received, transmitted, used or stored in support of the performance of a contract.	5	
§ 164.308(b)(3)	Implementation specifications: Written contract or other arrangement (Required)	Document the satisfactory assurances required by paragraph (b)(1) or (b)(2) of this section through a written contract or other arrangement with the business associate that meets the applicable requirements of § 164.314(a).	Functional	Equal	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.310	Physical safeguards	A covered entity or business associate must, in accordance with § 164.306:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.310(a)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.310(a)(1)	Standard: Facility access controls	Implement policies and procedures to limit physical access to its electronic information systems and the facility or facilities in which they are housed, while ensuring that properly authorized access is allowed.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(a)(1)	Standard: Facility access controls	Implement policies and procedures to limit physical access to its electronic information systems and the facility or facilities in which they are housed, while ensuring that properly authorized access is allowed.	Functional	Subset Of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
§ 164.310(a)(2)	Implementation specifications: [no content]		Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.310(a)(2)(i)	Contingency operations (Addressable)	Establish (and implement as needed) procedures that allow facility access in support of restoration of lost data under the disaster recovery plan and emergency mode operations plan in the event of an emergency.	Functional	Intersects With	Accessibility	BCD-09.2	Mechanisms exist to identify and mitigate potential accessibility problems to the alternate processing site and possible mitigation actions, in the event of an area-wide disruption or disaster.	8	
§ 164.310(a)(2)(i)	Contingency operations (Addressable)	Establish (and implement as needed) procedures that allow facility access in support of restoration of lost data under the disaster recovery plan and emergency mode operations plan in the event of an emergency.	Functional	Intersects With	Defined Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity roles & responsibilities for all personnel.	5	
§ 164.310(a)(2)(i)	Contingency operations (Addressable)	Establish (and implement as needed) procedures that allow facility access in support of restoration of lost data under the disaster recovery plan and emergency mode operations plan in the event of an emergency.	Functional	Intersects With	Physical Access Authorizations	PES-02	Physical access control mechanisms exist to maintain a current list of personnel with authorized access to organizational facilities (except for those areas within the facility officially designated as publicly accessible).	5	
§ 164.310(a)(2)(i)	Contingency operations (Addressable)	Establish (and implement as needed) procedures that allow facility access in support of restoration of lost data under the disaster recovery plan and emergency mode operations plan in the event of an emergency.	Functional	Intersects With	Role-Based Physical Access	PES-02.1	Physical access control mechanisms exist to authorize physical access to facilities based on the position or role of the individual.	5	
§ 164.310(a)(2)(ii)	Facility security plan (Addressable)	Implement policies and procedures to safeguard the facility and the equipment therein from unauthorized physical access, tampering, and theft.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(a)(2)(ii)	Facility security plan (Addressable)	Implement policies and procedures to safeguard the facility and the equipment therein from unauthorized physical access, tampering, and theft.	Functional	Subset Of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
§ 164.310(a)(2)(ii)	Facility security plan (Addressable)	Implement policies and procedures to safeguard the facility and the equipment therein from unauthorized physical access, tampering, and theft.	Functional	Intersects With	Physical Access Control	PES-03	Physical access control mechanisms exist to enforce physical access authorizations for all physical access points (including designated entry/exit points) to facilities (excluding those areas within the facility officially designated as publicly accessible).	5	
§ 164.310(a)(2)(ii)	Access control and validation procedures (Addressable)	Implement procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.	Functional	Subset Of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
§ 164.310(a)(2)(ii)	Access control and validation procedures (Addressable)	Implement procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.	Functional	Intersects With	Physical Access Authorizations	PES-02	Physical access control mechanisms exist to maintain a current list of personnel with authorized access to organizational facilities (except for those areas within the facility officially designated as publicly accessible).	5	
§ 164.310(a)(2)(ii)	Access control and validation procedures (Addressable)	Implement procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.	Functional	Intersects With	Physical Access Control	PES-03	Physical access control mechanisms exist to enforce physical access authorizations for all physical access points (including designated entry/exit points) to facilities (excluding those areas within the facility officially designated as publicly accessible).	5	
§ 164.310(a)(2)(ii)	Access control and validation procedures (Addressable)	Implement procedures to control and validate a person's access to facilities based on their role or function, including visitor control, and control of access to software programs for testing and revision.	Functional	Intersects With	Visitor Control	PES-06	Physical access control mechanisms exist to identify, authorize and monitor visitors before allowing access to the facility (other than areas designated as publicly accessible).	5	
§ 164.310(a)(2)(iv)	Maintenance records (Addressable)	Implement policies and procedures to document repairs and modifications to the physical components of a facility which are related to security (for example, hardware, walls, doors, and locks).	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(a)(2)(iv)	Maintenance records (Addressable)	Implement policies and procedures to document repairs and modifications to the physical components of a facility which are related to security (for example, hardware, walls, doors, and locks).	Functional	Subset Of	Maintenance Operations	MNT-01	Mechanisms exist to develop, disseminate, review & update procedures to facilitate the implementation of maintenance controls across the enterprise.	10	
§ 164.310(a)(2)(iv)	Maintenance records (Addressable)	Implement policies and procedures to document repairs and modifications to the physical components of a facility which are related to security (for example, hardware, walls, doors, and locks).	Functional	Intersects With	Controlled Maintenance	MNT-02	Mechanisms exist to conduct controlled maintenance activities throughout the lifecycle of the system, application or service.	8	
§ 164.310(a)(2)(iv)	Maintenance records (Addressable)	Implement policies and procedures to document repairs and modifications to the physical components of a facility which are related to security (for example, hardware, walls, doors, and locks).	Functional	Subset Of	Physical & Environmental Protections	PES-01	Mechanisms exist to facilitate the operation of physical and environmental protection controls.	10	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Subset Of	Enterprise Device Management (EDM)	END-01	Mechanisms exist to facilitate the implementation of Enterprise Device Management (EDM) controls.	10	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Terms of Employment	HRS-05	Mechanisms exist to require all employees and contractors to apply cybersecurity and data protection principles in their daily work.	5	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Rules of Behavior	HRS-05.1	Mechanisms exist to define acceptable and unacceptable rules of behavior for the use of technologies, including consequences for unacceptable behavior.	3	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Use of Communications Technology	HRS-05.3	Mechanisms exist to establish usage restrictions and implementation guidance for communications technologies based on the potential to cause damage to systems, if used maliciously.	3	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Standardized Operating Procedures (SOP)	OPS-01.1	Mechanisms exist to identify and document Standardized Operating Procedures (SOP), or similar documentation, to enable the proper execution of day-to-day / assigned tasks.	5	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Service Delivery (Business Process Support)	OPS-03	Mechanisms exist to define supporting business processes and implement appropriate governance and service management to ensure appropriate planning, delivery and support of the organization's technology capabilities supporting business functions, workforce, and/or customers based on industry-recognized standards to achieve the specific goals of the process area.	3	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Access To Information Systems	PES-03.4	Physical access control mechanisms exist to enforce physical access to critical systems or sensitive/regulated data, in addition to the physical access controls for the facility.	3	
§ 164.310(b)	Standard: Workstation use	Implement policies and procedures that specify the proper functions to be performed, the manner in which those functions are to be performed, and the physical attributes of the surroundings of a specific workstation or class of workstation that can access electronic protected health information.	Functional	Intersects With	Physical Security of Offices, Rooms & Facilities	PES-04	Mechanisms exist to identify systems, equipment and respective operating environments that require limited physical access so that appropriate physical access controls are designed and implemented for offices, rooms and facilities.	3	
§ 164.310(c)	Standard: Workstation security	Implement physical safeguards for all workstations that access electronic protected health information, to restrict access to authorized users	Functional	Subset Of	Endpoint Protection Measures	END-02	Mechanisms exist to protect the confidentiality, integrity, availability and safety of endpoint devices.	10	
§ 164.310(c)	Standard: Workstation security	Implement physical safeguards for all workstations that access electronic protected health information, to restrict access to authorized users	Functional	Intersects With	Physical Access Control	PES-03	Physical access control mechanisms exist to enforce physical access authorizations for all physical access points (including designated entry/exit points) to facilities (excluding those areas within the facility officially designated as publicly accessible).	5	
§ 164.310(c)	Standard: Workstation security	Implement physical safeguards for all workstations that access electronic protected health information, to restrict access to authorized users	Functional	Intersects With	Access To Information Systems	PES-03.4	Physical access control mechanisms exist to enforce physical access to critical systems or sensitive/regulated data, in addition to the physical access controls for the facility.	5	
§ 164.310(c)	Standard: Workstation security	Implement physical safeguards for all workstations that access electronic protected health information, to restrict access to authorized users	Functional	Intersects With	Physical Security of Offices, Rooms & Facilities	PES-04	Mechanisms exist to identify systems, equipment and respective operating environments that require limited physical access so that appropriate physical access controls are designed and implemented for offices, rooms and facilities.	5	
§ 164.310(c)	Standard: Workstation security	Implement physical safeguards for all workstations that access electronic protected health information, to restrict access to authorized users	Functional	Intersects With	Working in Secure Areas	PES-04.1	Physical security mechanisms exist to allow only authorized personnel access to secure areas.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.310(d)	Standard: Device and media controls	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Subset Of	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	10	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Removal of Assets	AST-11	Mechanisms exist to authorize, control and track technology assets entering and exiting organizational facilities.	5	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Subset Of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Media Access	DCH-03	Mechanisms exist to control and restrict access to digital and non-digital media to authorized individuals.	5	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Media Transportation	DCH-07	Mechanisms exist to protect and control digital and non-digital media during transport outside of controlled areas using appropriate security measures.	5	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Custodians	DCH-07.1	Mechanisms exist to identify custodians throughout the transport of digital or non-digital media.	5	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Portable Storage Devices	DCH-13.2	Mechanisms exist to restrict or prohibit the use of portable storage devices by users on external systems.	5	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Subset Of	Maintenance Operations	MNT-01	Mechanisms exist to develop, disseminate, review & update procedures to facilitate the implementation of maintenance controls across the enterprise.	10	
§ 164.310(d)(1)	N/A	Implement policies and procedures that govern the receipt and removal of hardware and electronic media that contain electronic protected health information into and out of a facility, and the movement of these items within the facility.	Functional	Intersects With	Prevent Unauthorized Removal	MNT-04.3	Mechanisms exist to prevent or control the removal of equipment undergoing maintenance that containing organizational information.	5	
§ 164.310(d)(2)	Implementation specifications:	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.310(d)(2)(i)	Disposal (Required)	Implement policies and procedures to address the final disposition of electronic protected health information, and/or the hardware or electronic media on which it is stored.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.310(d)(2)(i)	Disposal (Required)	Implement policies and procedures to address the final disposition of electronic protected health information, and/or the hardware or electronic media on which it is stored.	Functional	Subset Of	Asset Governance	AST-01	Mechanisms exist to facilitate an IT Asset Management (ITAM) program to implement and manage asset management controls.	10	
§ 164.310(d)(2)(i)	Disposal (Required)	Implement policies and procedures to address the final disposition of electronic protected health information, and/or the hardware or electronic media on which it is stored.	Functional	Intersects With	Secure Disposal, Destruction or Re-Use of Equipment	AST-09	Mechanisms exist to securely dispose of, destroy or repurpose system components using organization-defined techniques and methods to prevent information being recovered from these components.	5	
§ 164.310(d)(2)(ii)	Media re-use (Required)	Implement procedures for removal of electronic protected health information from electronic media before the media are made available for re-use.	Functional	Intersects With	Secure Disposal, Destruction or Re-Use of Equipment	AST-09	Mechanisms exist to securely dispose of, destroy or repurpose system components using organization-defined techniques and methods to prevent information being recovered from these components.	5	
§ 164.310(d)(2)(ii)	Media re-use (Required)	Implement procedures for removal of electronic protected health information from electronic media before the media are made available for re-use.	Functional	Intersects With	System Media Sanitization	DCH-09	Mechanisms exist to sanitize system media with the strength and integrity commensurate with the classification or sensitivity of the information prior to disposal, release out of organizational control or release for reuse.	5	
§ 164.310(d)(2)(iii)	Accountability (Addressable)	Maintain a record of the movements of hardware and electronic media and any person responsible therefore.	Functional	Intersects With	Asset Inventories	AST-02	Mechanisms exist to perform inventories of Technology Assets, Applications, Services and/or Data (TAASD) that: (1) Accurately reflects the current TAASD in use; (2) Identifies authorized software products, including business justification details; (3) Is at the level of granularity deemed necessary for tracking and reporting; (4) Includes organization-defined information deemed necessary to achieve effective proper accountability; and (5) Is available for review and audit by designated organizational personnel.	3	
§ 164.310(d)(2)(iii)	Accountability (Addressable)	Maintain a record of the movements of hardware and electronic media and any person responsible therefore.	Functional	Intersects With	Updates During Installations / Removals / Configuration	AST-02.1	Mechanisms exist to update asset inventories as part of component installations, removals and asset upgrades.	3	
§ 164.310(d)(2)(ii)	Accountability (Addressable)	Maintain a record of the movements of hardware and electronic media and any person responsible therefore.	Functional	Intersects With	Management Database (CMB)	AST-02.9	Mechanisms exist to implement and manage a Configuration Management Database (CMB), or similar technology, to monitor and govern technology asset-specific information.	5	
§ 164.310(d)(2)(ii)	Accountability (Addressable)	Maintain a record of the movements of hardware and electronic media and any person responsible therefore.	Functional	Intersects With	Asset Ownership Assignment	AST-03	Mechanisms exist to ensure asset ownership responsibilities are assigned, tracked and managed at a team, individual, or responsible organization level to establish a common understanding of requirements for asset protection.	5	
§ 164.310(d)(2)(ii)	Accountability (Addressable)	Maintain a record of the movements of hardware and electronic media and any person responsible therefore.	Functional	Intersects With	Accountability Information	AST-03.1	Mechanisms exist to include capturing the name, position and/or role of individuals responsible/accountable for administering assets as part of the technology asset inventory process.	5	
§ 164.310(d)(2)(iv)	Data backup and storage (Addressable)	Create a retrievable, exact copy of electronic protected health information, when needed, before movement of equipment.	Functional	Intersects With	Data Backups	BCD-11	Mechanisms exist to create recurring backups of data, software and/or system images, as well as verify the integrity of these backups, to ensure the availability of the data to satisfy Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).	3	
§ 164.312	Technical safeguards	A covered entity or business associate must, in accordance with § 164.306:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(a)	Standard: Access control	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Intersects With	Position Categorization	HRS-02	Mechanisms exist to manage personnel security risk by assigning a risk designation to all positions and establishing screening criteria for individuals filling those positions.	5	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Intersects With	Defined Roles & Responsibilities	HRS-03	Mechanisms exist to define cybersecurity roles & responsibilities for all personnel.	5	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Subset Of	Identity & Access Management (IAM)	IAC-01	Mechanisms exist to facilitate the implementation of identification and access management controls.	10	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Intersects With	Role-Based Access Control (RBAC)	IAC-08	Mechanisms exist to enforce Role-Based Access Control (RBAC) for Technology Assets, Applications, Services and/or Data (TAASD) to restrict access to individuals assigned specific roles with legitimate business needs.	5	
§ 164.312(a)(1)	N/A	Implement technical policies and procedures for electronic information systems that maintain electronic protected health information to allow access only to those persons or software programs that have been granted access rights as specified in § 164.308(e)(4).	Functional	Intersects With	Least Privilege	IAC-21	Mechanisms exist to utilize the concept of least privilege, allowing only authorized access to processes necessary to accomplish assigned tasks in accordance with organizational business functions.	5	
§ 164.312(a)(2)	Implementation specifications:	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(a)(2)(i)	Unique user identification (Required)	Assign a unique name and/or number for identifying and tracking user identity.	Functional	Subset Of	Identification & Authentication for Organizational Users	IAC-02	Mechanisms exist to uniquely identify and centrally Authenticate, Authorize and Audit (AAA) organizational users and processes acting on behalf of organizational users.	10	
§ 164.312(a)(2)(i)	Unique user identification (Required)	Assign a unique name and/or number for identifying and tracking user identity.	Functional	Equal	Identifier Management (User Names)	IAC-09	Mechanisms exist to govern naming standards for usernames and Technology Assets, Applications and/or Services (TAAS).	10	
§ 164.312(a)(2)(ii)	Emergency access procedure (Required)	Establish (and implement as needed) procedures for obtaining necessary electronic protected health information during an emergency.	Functional	Subset Of	Account Management	IAC-15	Mechanisms exist to proactively govern account management of individual, group, system, service, application, guest and temporary accounts.	10	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.312(a)(2)(ii)	Emergency access procedure (Required)	Establish (and implement as needed) procedures for obtaining necessary electronic protected health information during an emergency.	Functional	Intersects With	Removal of Temporary / Emergency Accounts	IAC-15.2	Automated mechanisms exist to disable or remove temporary and emergency accounts after an organization-defined time period for each type of account.	3	
§ 164.312(a)(2)(ii)	Emergency access procedure (Required)	Establish (and implement as needed) procedures for obtaining necessary electronic protected health information during an emergency.	Functional	Equal	Emergency Accounts	IAC-15.9	Mechanisms exist to establish and control "emergency access only" accounts.	10	
§ 164.312(a)(2)(ii)	Automatic logoff (Addressable)	Implement electronic procedures that terminate an electronic session after a predetermined time of inactivity.	Functional	Intersects With	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for Technology Assets, Applications and/or Services (TAAS) that are consistent with industry-accepted system hardening standards.	5	
§ 164.312(a)(2)(ii)	Automatic logoff (Addressable)	Implement electronic procedures that terminate an electronic session after a predetermined time of inactivity.	Functional	Intersects With	Session Termination	IAC-25	Automated mechanisms exist to log out users, both locally on the network and for remote sessions, at the end of the session or after an organization-defined period of inactivity.	5	
§ 164.312(a)(2)(iv)	Encryption and decryption (Addressable)	Implement a mechanism to encrypt and decrypt electronic protected health information.	Functional	Subset Of	Use of Cryptographic Controls	CRY-01	Mechanisms exist to facilitate the implementation of cryptographic protections controls using known public standards and trusted cryptographic technologies.	10	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Subset Of	Continuous Monitoring	MON-01	Mechanisms exist to facilitate the implementation of enterprise-wide monitoring controls.	10	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	System Generated Alerts	MON-01.4	Mechanisms exist to generate, monitor, correlate and respond to alerts from physical, cybersecurity, data privacy and supply chain activities to achieve integrated situational awareness.	5	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	Security Event Monitoring	MON-01.8	Mechanisms exist to review event logs on an ongoing basis and escalate incidents in accordance with established timelines and procedures.	5	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	Analyze and Prioritize Monitoring Requirements	MON-01.16	Mechanisms exist to assess the organization's needs for monitoring and prioritize the monitoring of assets, based on asset criticality and the sensitivity of the data it stores, transmits and processes.	5	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	Content of Event Logs	MON-03	Mechanisms exist to configure Technology Assets, Applications and/or Services (TAAS) to produce event logs that contain sufficient information to, at a minimum: (1) Establish what type of event occurred; (2) When (date and time) the event occurred; (3) Where the event occurred; (4) The source of the event; (5) The outcome (success or failure) of the event; and (6) The identity of any user/subject associated with the event.	5	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	Audit Trails	MON-03.2	Mechanisms exist to link system access to individual users or service accounts.	5	
§ 164.312(b)	Standard: Audit controls	Implement hardware, software, and/or procedural mechanisms that record and examine activity in information systems that contain or use electronic protected health information.	Functional	Intersects With	Anomalous Behavior	MON-16	Mechanisms exist to utilize User & Entity Behavior Analytics (UEBA) and/or User Activity Monitoring (UAM) solutions to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities.	5	
§ 164.312(c)	Standard: Integrity (no content)		Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(c)(1)	N/A	Implement policies and procedures to protect electronic protected health information from improper alteration or destruction.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.312(c)(1)	N/A	Implement policies and procedures to protect electronic protected health information from improper alteration or destruction.	Functional	Subset Of	Data Protection	DCH-01	Mechanisms exist to facilitate the implementation of data protection controls.	10	
§ 164.312(c)(1)	N/A	Implement policies and procedures to protect electronic protected health information from improper alteration or destruction.	Functional	Intersects With	Sensitive / Regulated Data Protection	DCH-01.2	Mechanisms exist to protect sensitive/regulated data wherever it is processed and/or stored.	5	
§ 164.312(c)(2)	Implementation specification: Mechanism to authenticate electronic protected health information (Addressable)	Implement electronic mechanisms to corroborate that electronic protected health information has not been altered or destroyed in an unauthorized manner.	Functional	Intersects With	Sensitive / Regulated Data Access Enforcement	CFG-08	Mechanisms exist to configure Technology Assets, Applications and/or Services (TAAS) to restrict access to sensitive/regulated data.	5	
§ 164.312(c)(2)	Implementation specification: Mechanism to authenticate electronic protected health information (Addressable)	Implement electronic mechanisms to corroborate that electronic protected health information has not been altered or destroyed in an unauthorized manner.	Functional	Intersects With	Sensitive / Regulated Data Actions	CFG-08.1	Automated mechanisms exist to generate event logs whenever sensitive/regulated data is collected, created, updated, deleted and/or archived.	5	
§ 164.312(c)(2)	Implementation specification: Mechanism to authenticate electronic protected health information (Addressable)	Implement electronic mechanisms to corroborate that electronic protected health information has not been altered or destroyed in an unauthorized manner.	Functional	Intersects With	File Integrity Monitoring (FIM)	MON-01.7	Mechanisms exist to utilize a File Integrity Monitor (FIM), or similar change-detection technology, on critical assets to generate alerts for unauthorized modifications.	5	
§ 164.312(c)(2)	Implementation specification: Mechanism to authenticate electronic protected health information (Addressable)	Implement electronic mechanisms to corroborate that electronic protected health information has not been altered or destroyed in an unauthorized manner.	Functional	Intersects With	Privileged User Oversight	MON-01.15	Mechanisms exist to implement enhanced activity monitoring for privileged users.	5	
§ 164.312(c)(2)	Implementation specification: Mechanism to authenticate electronic protected health information (Addressable)	Implement electronic mechanisms to corroborate that electronic protected health information has not been altered or destroyed in an unauthorized manner.	Functional	Intersects With	Anomalous Behavior	MON-16	Mechanisms exist to utilize User & Entity Behavior Analytics (UEBA) and/or User Activity Monitoring (UAM) solutions to detect and respond to anomalous behavior that could indicate account compromise or other malicious activities.	5	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Subset Of	Human Resources Security Management	HRS-01	Mechanisms exist to facilitate the implementation of personnel security controls.	10	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Intersects With	Personnel Screening	HRS-04	Mechanisms exist to manage personnel security risk by screening individuals prior to authorizing access.	5	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Intersects With	Identity Proofing (Identity Verification)	IAC-28	Mechanisms exist to verify the identity of a user before issuing authenticators or modifying access permissions.	5	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Intersects With	Identity Evidence	IAC-28.2	Mechanisms exist to require evidence of individual identification to be presented to the registration authority.	5	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Intersects With	Identity Evidence Validation & Verification	IAC-28.3	Mechanisms exist to require that the presented identity evidence be validated and verified through organizational-defined methods of validation and verification.	5	
§ 164.312(d)	Standard: Person or entity authentication	Implement procedures to verify that a person or entity seeking access to electronic protected health information is the one claimed.	Functional	Subset Of	Third-Party Management	TPM-01	Mechanisms exist to facilitate the implementation of third-party management controls.	10	
§ 164.312(e)	Standard: Transmission security	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(e)(1)	N/A	Implement technical security measures to guard against unauthorized access to electronic protected health information that is being transmitted over an electronic communications network.	Functional	Intersects With	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for Technology Assets, Applications and/or Services (TAAS) that are consistent with industry-accepted system hardening standards.	5	
§ 164.312(e)(1)	N/A	Implement technical security measures to guard against unauthorized access to electronic protected health information that is being transmitted over an electronic communications network.	Functional	Intersects With	Transmission Confidentiality	CRY-03	Cryptographic mechanisms exist to protect the confidentiality of data being transmitted.	5	
§ 164.312(e)(1)	N/A	Implement technical security measures to guard against unauthorized access to electronic protected health information that is being transmitted over an electronic communications network.	Functional	Subset Of	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	10	
§ 164.312(e)(2)	Implementation specifications: [no content]		Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.312(e)(2)(i)	Integrity controls (Addressable)	Implement security measures to ensure that electronically transmitted electronic protected health information is not improperly modified without detection until disposed of.	Functional	Intersects With	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for Technology Assets, Applications and/or Services (TAAS) that are consistent with industry-accepted system hardening standards.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.312(e)(2)(i)	Integrity controls (Addressable)	Implement security measures to ensure that electronically transmitted electronic protected health information is not improperly modified without detection until disposed of.	Functional	Intersects With	Transmission Integrity	CRY-04	Cryptographic mechanisms exist to protect the integrity of data being transmitted.	5	
§ 164.312(e)(2)(i)	Integrity controls (Addressable)	Implement security measures to ensure that electronically transmitted electronic protected health information is not improperly modified without detection until disposed of.	Functional	Subset Of	Network Security Controls (NSC)	NET-01	Mechanisms exist to develop, govern & update procedures to facilitate the implementation of Network Security Controls (NSC).	10	
§ 164.312(e)(2)(ii)	Encryption (Addressable)	Implement a mechanism to encrypt electronic protected health information whenever deemed appropriate.	Functional	Intersects With	System Hardening Through Baseline Configurations	CFG-02	Mechanisms exist to develop, document and maintain secure baseline configurations for Technology Assets, Applications and/or Services (TAAS) that are consistent with industry-accepted system hardening standards.	5	
§ 164.312(e)(2)(ii)	Encryption (Addressable)	Implement a mechanism to encrypt electronic protected health information whenever deemed appropriate.	Functional	Subset Of	Use of Cryptographic Controls	CRY-01	Mechanisms exist to facilitate the implementation of cryptographic protections controls using known public standards and trusted cryptographic technologies.	10	
§ 164.312(e)(2)(ii)	Encryption (Addressable)	Implement a mechanism to encrypt electronic protected health information whenever deemed appropriate.	Functional	Intersects With	Service Delivery (Business Process Support)	OPS-03	Mechanisms exist to define supporting business processes and implement appropriate governance and service management to ensure appropriate planning, delivery and support of the organization's technology capabilities supporting business functions, workforce, and/or customers based on industry-recognized standards to achieve the specific goals of the process area.	5	
§ 164.314	Organizational requirements	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(a)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(a)(1)	Standard: Business associate contracts or other arrangements	The contract or other arrangement required by § 164.308(b)(3) must meet the requirements of paragraph (a)(2)(i), (a)(2)(ii), or (a)(2)(iii) of this section, as applicable.	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
§ 164.314(a)(2)	Implementation specifications (Required)	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(a)(2)(ii)	Business associate contracts	The contract must provide that the business associate will—	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(a)(2)(ii)(A)	N/A	Comply with the applicable requirements of this subpart;	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(a)(2)(ii)(B)	N/A	In accordance with § 164.308(b)(2), ensure that any subcontractors that create, receive, maintain, or transmit electronic protected health information on behalf of the business associate agree to comply with the applicable requirements of this subpart by entering into a contract or other arrangement that complies with this section; and	Functional	Equal	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity and data protection requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	10	
§ 164.314(a)(2)(ii)(C)	N/A	Report to the covered entity any security incident of which it becomes aware, including breaches of unsecured protected health information as required by § 164.410.	Functional	Equal	Security Compromise Notification Agreements	TPM-05.1	Mechanisms exist to compel External Service Providers (ESPs) to provide notification of actual or potential compromises in the supply chain that can potentially affect or have adversely affected Technology Assets, Applications and/or Services (TAAS) that the organization utilizes.	10	
§ 164.314(a)(2)(ii)	Other arrangements	The covered entity is in compliance with paragraph (a)(1) of this section if it has another arrangement in place that meets the requirements of § 164.504(e)(3).	Functional	Subset Of	Statutory, Regulatory & Contractual Compliance	CPL-01	Mechanisms exist to facilitate the identification and implementation of relevant statutory, regulatory and contractual controls.	10	
§ 164.314(a)(2)(ii)(D)	Business associate contracts with subcontractors	The requirements of paragraphs (a)(2)(i) and (a)(2)(ii) of this section apply to the contract or other arrangement between a business associate and a subcontractor required by § 164.308(b)(4) in the same manner as such requirements apply to contracts or other arrangements between a covered entity and business associate.	Functional	Intersects With	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	5	
§ 164.314(a)(2)(ii)(E)	Business associate contracts with subcontractors	The requirements of paragraphs (a)(2)(i) and (a)(2)(ii) of this section apply to the contract or other arrangement between a business associate and a subcontractor required by § 164.308(b)(4) in the same manner as such requirements apply to contracts or other arrangements between a covered entity and business associate.	Functional	Intersects With	Contract Flow-Down Requirements	TPM-05.2	Mechanisms exist to ensure cybersecurity and data protection requirements are included in contracts that flow-down to applicable sub-contractors and suppliers.	5	
§ 164.314(b)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(b)(1)	Standard: Requirements for group health plans	Except when the only electronic protected health information disclosed to a plan sponsor is disclosed pursuant to § 164.504(b)(1)(ii) or (iii), or as authorized under § 164.508, a group health plan must ensure that its plan documents provide that the plan sponsor will reasonably and appropriately safeguard electronic protected health information created, received, maintained, or transmitted to or by the plan sponsor on behalf of the group health plan.	Functional	Equal	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.314(b)(2)	Implementation specifications (Required)	The plan documents of the group health plan must be amended to incorporate provisions to require the plan sponsor to—	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.314(b)(2)(i)	N/A	Implement administrative, physical, and technical safeguards that reasonably and appropriately protect the confidentiality, integrity, and availability of the electronic protected health information that it creates, receives, maintains, or transmits on behalf of the group health plan;	Functional	Equal	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.314(b)(2)(ii)	N/A	Ensure that the adequate separation required by § 164.504(b)(2)(ii) is supported by reasonable and appropriate security measures;	Functional	Equal	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.314(b)(2)(iii)	N/A	Ensure that any agent to whom it provides this information agrees to implement reasonable and appropriate security measures to protect the information; and	Functional	Equal	Third-Party Contract Requirements	TPM-05	Mechanisms exist to require contractual requirements for cybersecurity and data protection requirements with third-parties, reflecting the organization's needs to protect its Technology Assets, Applications, Services and/or Data (TAASD).	10	
§ 164.314(b)(2)(iv)	N/A	Report to the group health plan any security incident of which it becomes aware.	Functional	Equal	Security Compromise Notification Agreements	TPM-05.1	Mechanisms exist to compel External Service Providers (ESPs) to provide notification of actual or potential compromises in the supply chain that can potentially affect or have adversely affected Technology Assets, Applications and/or Services (TAAS) that the organization utilizes.	10	
§ 164.316	Policies and procedures and documentation requirements	A covered entity or business associate must, in accordance with § 164.306:	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.316(a)	Standard: Policies and procedures	Implement reasonable and appropriate policies and procedures to comply with the standards, implementation specifications, or other requirements of this subpart, taking into account those factors specified in § 164.306(b)(2)(i), (ii), (iii), and (iv). This standard is not to be construed to permit or excuse an action that violates any other standard, implementation specification, or other requirements of this subpart. A covered entity or business associate may change its policies and procedures at any time, provided that the changes are documented and are implemented in accordance with this subpart.	Functional	Subset Of	Cybersecurity & Data Protection Governance Program	GOV-01	Mechanisms exist to facilitate the implementation of cybersecurity and data protection governance controls.	10	
§ 164.316(a)	Standard: Policies and procedures	Implement reasonable and appropriate policies and procedures to comply with the standards, implementation specifications, or other requirements of this subpart, taking into account those factors specified in § 164.306(b)(2)(i), (ii), (iii), and (iv). This standard is not to be construed to permit or excuse an action that violates any other standard, implementation specification, or other requirements of this subpart. A covered entity or business associate may change its policies and procedures at any time, provided that the changes are documented and are implemented in accordance with this subpart.	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.316(b)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.316(b)(1)(i)	N/A	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.316(b)(1)(i)	Standard: Documentation	Maintain the policies and procedures implemented to comply with this subpart in written (which may be electronic) form; and	Functional	Subset Of	Publishing Cybersecurity & Data Protection Documentation	GOV-02	Mechanisms exist to establish, maintain and disseminate cybersecurity and data protection policies, standards and procedures.	10	
§ 164.316(b)(1)(ii)	N/A	If an action, activity or assessment is required by this subpart to be documented, maintain a written (which may be electronic) record of the action, activity, or assessment.	Functional	Intersects With	Periodic Review & Update of Cybersecurity & Data Protection Program	GOV-03	Mechanisms exist to review the cybersecurity and data protection program, including policies, standards and procedures, at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	3	
§ 164.316(b)(1)(iii)	N/A	If an action, activity or assessment is required by this subpart to be documented, maintain a written (which may be electronic) record of the action, activity, or assessment.	Functional	Intersects With	Cybersecurity & Data Protection Assessments	CPL-03	Mechanisms exist to regularly review processes and documented procedures to ensure conformity with the organization's cybersecurity and data protection policies, standards and other applicable requirements.	3	
§ 164.316(b)(2)	Implementation specifications:	[no content]	Functional	No Relationship	N/A	N/A	No applicable SCF control	N/A	
§ 164.316(b)(2)(i)	Time limit (Required)	Retain the documentation required by paragraph (b)(1) of this section for 6 years from the date of its creation or the date when it last was in effect, whichever is later.	Functional	Equal	Media & Data Retention	DCH-18	Mechanisms exist to retain media and data in accordance with applicable statutory, regulatory and contractual obligations.	10	
§ 164.316(b)(2)(ii)	Availability (Required)	Make documentation available to those persons responsible for implementing the procedures to which the documentation pertains.	Functional	Intersects With	Standardized Operating Procedures (SOP)	OPS-01.1	Mechanisms exist to identify and document Standardized Operating Procedures (SOP), or similar documentation, to enable the proper execution of day-to-day / assigned tasks.	5	

FDE #	FDE Name	Focal Document Element (FDE) Description	STRM Rationale	STRM Relationship	SCF Control	SCF #	Secure Controls Framework (SCF) Control Description	Strength of Relationship	Notes
§ 164.316(b)(2)(ii)	Availability (Required)	Make documentation available to those persons responsible for implementing the procedures to which the documentation pertains.	Functional	Intersects With	Service Delivery (Business Process Support)	OPS-03	Mechanisms exist to define supporting business processes and implement appropriate governance and service management to ensure appropriate planning, delivery and support of the organization's technology capabilities supporting business functions, workforce, and/or customers based on industry-recognized standards to achieve the specific goals of the process area.	5	
§ 164.316(b)(2)(iii)	Updates (Required)	Review documentation periodically, and update as needed, in response to environmental or operational changes affecting the security of the electronic protected health information.	Functional	Intersects With	Periodic Review & Update of Cybersecurity & Data Protection Program	GOV-03	Mechanisms exist to review the cybersecurity and data protection program, including policies, standards and procedures, at planned intervals or if significant changes occur to ensure their continuing suitability, adequacy and effectiveness.	5	
§ 164.316(b)(2)(iii)	Updates (Required)	Review documentation periodically, and update as needed, in response to environmental or operational changes affecting the security of the electronic protected health information.	Functional	Intersects With	Cybersecurity & Data Protection Controls Oversight	CPL-02	Mechanisms exist to provide a cybersecurity and data protection controls oversight function that reports to the organization's executive leadership.	5	